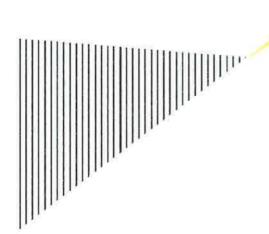
Agenda Item 8



Oxford City Council

Year ending 31 March 2013

Audit Plan

14 February 2013

■ Ernst & Young

Audit & Governance Committee Oxford City Council Town Hall Offices Oxford OX1 1BX 14 February 2013

Dear Councillors

Audit Plan

We are pleased to attach our Audit Plan which sets out how we intend to carry out our responsibilities as auditor. The purpose of this report is to provide the Audit & Governance Committee with a basis to review our proposed audit approach and scope for the 2013 audit, in accordance with the requirements of the Audit Commission Act 1998, the Code of Audit Practice, the Standing Guidance, auditing standards and other professional requirements, but also to ensure that our audit is aligned with the Committee's service expectations.

This report summarises our assessment of the key risks which drive the development of an effective audit for Oxford City Council, and outlines our planned audit strategy in response to those risks.

We welcome the opportunity to discuss this report with you on 28 February 2013 as well as understand whether there are other matters which you consider may influence our audit.

Yours faithfully

Maria Grindley For and behalf of Ernst & Young LLP Enc

Contents

1.	Overview	·	2
2.	Financial	Statement Risks	.v.: 5
3.	Economy	r, Efficiency & Effectiveness	6
4.	Our audi	process and strategy	7
5.	Independ	ence	11
App	endix A	Fees	. 14
App	endix B	UK required communications with those charged with governance	. 15
Apr	endix C	Detailed scopes	. 17

Overview

Context for the audit

This audit plan covers the work that we plan to perform in order to provide you with:

- Our audit opinion on whether the financial statements of Oxford City Council give a true and fair view of the financial position as at 31 March 2013 and of the income and expenditure for the year then ended; and
- A statutory conclusion on the Council's arrangements to secure economy, efficiency and effectiveness.

We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on your Whole of Government Accounts return.

When planning the audit we take into account several key inputs:

- Strategic, operational and financial risks relevant to the financial statements;
- Developments in financial reporting and auditing standards;
- The quality of systems and processes;
- ▶ Changes in the business and regulatory environment; and
- Management's views on all of the above.

By considering these inputs, our audit is focused on the areas that matter. This means our feedback is more likely to be relevant to the Council.

Our audit will also include the mandatory procedures that we are required to perform in accordance with applicable laws and auditing standards.

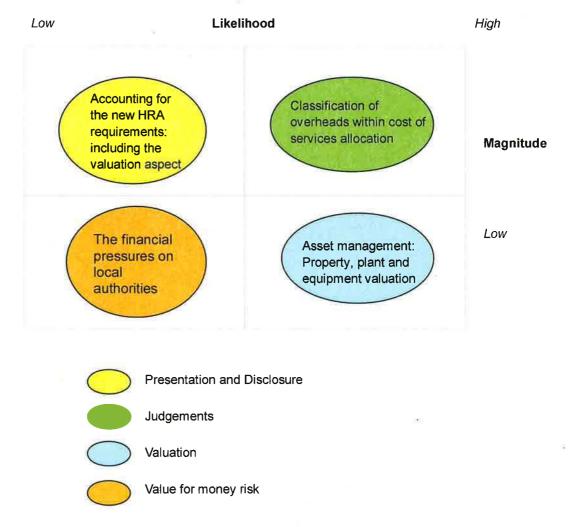
A change in the 2012/13 Code of Practice results from the Localism Act of 2011: the subsidy method of financing the Housing Revenue Account (HRA) is replaced with a system of self-financing. From 2012/13 authorities will no longer receive housing subsidy or Major Repairs Allowance (MRA) income. Instead they will be expected to fund all HRA revenue and capital expenditure from existing resources. In other words revenue expenditure will be funded principally from rental income, and capital expenditure principally from debt finance.

There will be transitional arrangements to cover the next five years. We will need to consider whether the Council has complied with the Code requirements for accounting for the HRA and that depreciation and impairment charges are not understated.

In part 2 and 3 of this report we provide more detail on the areas which we believe present significant risk to the financial statements audit, and outline our plans to address them.

As part of our planning we have identified three specific risks to the audit of financial statements and for the value for money conclusion we will consider the impact of the financial pressure on financial resilience and use of resources:

- Asset management, valuations and leases: this is an area which caused problems during the 2011/12 Audit Commission audit and extra work was necessary. These were reported to the Audit & Governance Committee in the Annual Governance Report (AGR).
- 2. Apportionment of overheads to services: again there were errors in the statements and extra work was necessary. This was also reported to the Committee during the 2011/12 audit in the AGR.
- 3. Getting the changes in accounting for the Housing Revenue right, as this is a new requirement.
- 4. The current financial pressures on local authorities and the impact and necessity for continuous focus on financial resilience and use of resources.



We will provide an update to the Audit & Governance Committee on the results of our work in these areas in our report to those charged with governance scheduled for delivery in September 2013.

Our process and strategy

Financial Statement Audit

We will apply the concept of materiality in planning and performing our audit, in evaluating the effect of any identified misstatements and in forming our opinion. We set our materiality based on the Council's level of gross expenditure. We also consider the size of useable reserves, the Council's financial position, its public profile and the reporting and challenge history. Our audit is designed to identify errors above materiality.

- We aim to rely on the Council's internal controls in the key financial systems to the fullest extent allowed by auditing standards. We identify the controls we consider important and seek to place reliance on internal audit's testing of those controls. Where control failures are identified we consider the most appropriate steps to take.
- We seek to place reliance on the work of internal audit wherever possible. We have already liaised with Internal Audit and have commenced our review and reperformance of their work.
- ► The key members of our audit team are Maria Grindley, Director; Alan Witty, Manager; and Susan Whipp, Team Leader
- ► There is a change to the scope of our audit arising from changes to the Code of Practice in accounting for the Housing Revenue Account from 2012/13. We will need to consider whether the Council has complied with the Code requirements for accounting for the HRA and that depreciation and impairment charges are not understated.

Arrangements for securing Economy, Efficiency and Effectiveness

We adopt an integrated audit approach: our work on the financial statement audit feeds into our consideration of the arrangements in place for securing economy, efficiency and effectiveness.

We have not identified any specific risk areas which require us to undertake additional work to address them.

2. Financial Statement Risks

We outline below our assessment of the key strategic or operational risks and the financial statement risks facing the Council, identified through our knowledge of the entity's operations and discussion with members and officers.

At our meeting, we will seek to validate these with you.

Significant risks (including fraud risks)

Asset Management

The asset register is maintained on an Excel spreadsheet rather than a tailored IT package. Problems were found last year with the valuations of certain classes of assets, e.g. surplus assets.

Accounting for the new HRA requirements

The guidance needs to be followed to ensure the Council is able to deliver the new processes and procedures.

Apportionment of overheads

Errors were found last year in the apportionment of overheads to service areas

Risk of misstatement due to fraud and error

Management has the primary responsibility to prevent and detect fraud. It is important that management, with the oversight of those charged with governance, has a culture of ethical behaviour and a strong control environment that both deters and prevents fraud. Our responsibility is to plan and perform audits to obtain reasonable assurance about whether the financial statements as a whole are free of material misstatements, whether caused by error or fraud. As auditors, we approach each engagement with a questioning mind that accepts the possibility that a material misstatement, due to fraud could occur, and design the appropriate procedures to consider such a risk.

Our audit approach

Our approach will focus on:

- Reviewing the work of Internal Audit
- Testing the integrity of the spreadsheet
- Substantively agreeing values back to the valuer's reports
- Substantively reviewing the valuation bases used.

Our approach will focus on:

Reviewing the Council's approach against the requirements.

Our approach will focus on:

Substantively testing a sample of overheads.

Based on the requirements of auditing standards our approach will focus on:

- ldentifying fraud risks during the planning stages.
- Inquiry of management about risks of fraud and the controls put in place to address those risks.
- Understanding the oversight given by those charged with governance of management's processes over fraud.
- Consideration of the effectiveness of management's controls designed to address the risk of fraud.
- Determining an appropriate strategy to address those identified risks of fraud.
- Performing mandatory procedures regardless of specifically identified fraud risks.

We will consider the results of the National Fraud Initiative and may refer to it in our reporting to you.

- Our approach to address the risks of fraud we have identified at this stage of our planning will focus on:
- reviewing the year-end position against in-year financial forecasts;
- reviewing the reasonableness and completeness of prepayments, accruals and provisions;
- testing material adjustments made by journals; and
- reviewing transactions both before and after yearend to ensure they are correctly disclosed in the correct financial period

3. Economy, Efficiency & Effectiveness

Our work will focus on:

- 1. Whether there are proper arrangements in place for securing financial resilience at Oxford City Council; and
- 2. Whether there are proper arrangements in place at Oxford City Council to secure economy, efficiency and effectiveness in the use of resources.

The table below provides a high-level summary of our risk assessment and our proposed response to those risks. At this stage of our audit we have not identified any significant risks. We acknowledge the Council operates in a context of increasing financial pressure.

Other risks		Our audit approach
Changes to arrangements for council tax support and business rates		
From April 2013, there will be changes	Economy, efficiency and effectiveness Financial resilience	Our approach will focus on:
to the arrangements for both Local Council Tax Support and business rates. These changes represent a		How the Council has planned for and managed these changes.
significant change for the Council and bring both financial and reputational risks.		How the Council has assessed the likely impact of the changes on its financial position and built these into its future financial projections and budget.
HRA financing		
HRA self determination took effect in	Financial resilience	Our approach will focus on:
late 2011/12, however 2012/13 is the first year where the Council will need to consider a number of new key arrangements including:		Reviewing the planning assumptions and repayment of debt profile as par of our value for money conclusion work.
Loan Debt – How is the Council planning on repaying the loan debt?		
Planning assumptions – Are the original budget planning assumptions still appropriate?		

4. Our audit process and strategy

4.1 Objective and scope of our audit

Under the Audit Commission's Code of Audit Practice ('the Code'), dated March 2010, our principal objectives are to review and report on, to the extent required by the relevant legislation and the requirements of the Code, the Council's:

- i) financial statements; and
- ii) arrangements for securing economy, efficiency and effectiveness in its use of resources.

We issue a two-part audit report covering both of these objectives.

i) Financial Statement Audit

Our objective is to form an opinion on the financial statements under International Standards on Auditing (UK and Ireland).

We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on your Whole of Government Accounts return

ii) Arrangements for securing economy, efficiency and effectiveness

The Code sets out our responsibility to satisfy ourselves that the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. In arriving at our conclusion, to the fullest extent possible we will place reliance on the reported results of the work of other statutory inspectorates in relation to corporate or service performance. In examining the Council's corporate performance management and financial management arrangements we have regard to the following criteria and areas of focus specified by the Audit Commission:

- Arrangements for securing financial resilience whether the Council has robust systems and processes to manage financial risks and opportunities effectively, and to secure a stable financial position that enables it to continue to operate for the foreseeable future; and
- Arrangements for securing economy, efficiency and effectiveness whether the Council is prioritising its resources within tighter budgets, for example by achieving cost reductions and by improving efficiency and productivity.

4.2 Audit process overview

Our audit involves:

- assessing the key internal controls in place and testing the operation of these controls;
- review and re-performance of the work of your internal auditors;
- reliance on the work of other auditors where appropriate;
- reliance on the work of experts in relation to areas such as pensions and valuations; and
- substantive tests of detail of transactions and amounts.

Processes

Our initial assessment of the key processes across the entity has identified the following key processes where we will seek to test key controls, both manual and IT:

- Accounts receivable
- Procure to pay
- Council tax
- Cash processing and bank
- Housing and Council Tax Benefits
- Pavroll
- Car park income

We propose to take a substantive approach to the following areas on the grounds of efficiency: housing rents, business rates, pensions, and journals.

Analytics

We will use our computer-based analytics tools to enable us to capture whole populations of your financial data, in particular for payroll, cash payments and receipts and journal entries. These tools:

- help identify specific exceptions and anomalies which can then be subject to more traditional substantive audit tests; and
- give greater likelihood of identifying errors than random sampling techniques.

We will report the findings from our process and analytics work, including any significant weaknesses or inefficiencies identified and recommendations for improvement, to management and the Audit & Governance Committee.

Internal audit

As in previous years, we will review internal audit plans and the results of their work. We will reflect the findings from these reports - together with reports from other work completed in the year - in our detailed audit plan, which raises issues that could have an impact on the year-end financial statements.

Use of experts

We will use specialist Ernst & Young resource as necessary to help us to form a view on judgments made in the financial statements.

In addition to the key areas of emphasis outlined above, we must perform other procedures as required by auditing, ethical and independence standards, the Code and other regulations. We outline the procedures we will undertake during the course of our audit.

Mandatory procedures required by auditing standards on:

- Addressing the risk of fraud and error.
- Significant disclosures included in the financial statements.
- Entity-wide controls.

- ► Reading other information contained in the financial statements and reporting whether it is inconsistent with our understanding and the financial statements.
- Auditor independence.

Procedures required by the Code

- Reviewing, and reporting on as appropriate, other information published with the financial statements, including the Annual Governance Statement and the Remuneration Report.
- Reviewing and reporting on the Whole of Government accounts return, in line with the instructions issued by the NAO.
- Reviewing, and where appropriate, examining evidence that is relevant to the Council's corporate performance management and financial management arrangements and reporting on these arrangements.

4.3 Materiality

For the purposes of determining whether the accounts are free from material error, we define materiality as the magnitude of an omission or misstatement that, individually or in the aggregate, in light of the surrounding circumstances, could reasonably be expected to influence the users of the financial statements. Our evaluation of it requires professional judgement and necessarily takes into account qualitative as well as quantitative considerations implicit in the definition. We would be happy to discuss with you your expectations regarding our detection of misstatements in the financial statements.

The amount we consider material at the end of the audit may differ from our initial determination. At this stage, however, it is not feasible to anticipate all of the circumstances that may ultimately influence our judgement about materiality. At the end of the audit we will form our final opinion by reference to all matters that could be significant to users of the accounts, including the total effect of the audit misstatements we identify, and our evaluation of materiality at that date.

ISA (UK & Ireland) 450 (revised) requires us to record all misstatements identified except those that are "clearly trivial". We intend to treat misstatements less than £200,000 as clearly trivial. All uncorrected misstatements found above this amount will be presented to you in our year-end report.

4.4 Fees

The Audit Commission has published a scale fee for all authorities. The scale fee is defined as the fee required by auditors to meet statutory responsibilities under the Audit Commission Act in accordance with the Code of Audit Practice 2010. The indicative fee scale for the audit of the Council is £114.000.

4.5 Your audit team

The engagement team is led by Maria Grindley, who has significant experience on Oxford City Council. Maria is supported by Alan Witty who is responsible for the day-to-day direction of audit work, and who is the key point of contact for the Head of Finance.

4.6 Timetable of communication, deliverables and insights

We have set out below a timetable showing the key stages of the audit, including the value for money work and the whole of government accounts; and the deliverables we have agreed to provide to you through the Audit & Governance Committee cycle in 2013. These dates are determined to ensure our alignment with the Audit Commission's rolling calendar of deadlines.

We will provide formal reports to the Audit & Governance Committee throughout our audit process as outlined below. Where required, we will issue an Interim Report, summarising the findings from our audit at that stage. From time to time matters may arise that require immediate communication with the Audit & Governance Committee and we will discuss them with the Audit and Governance Committee Chair as appropriate

Following the conclusion of our audit we will prepare a management letter in order to communicate to the Council and external stakeholders, including members of the public, the key issues arising from our work.

Audit phase	Timetable	Audit & Governance Committee timetable	Deliverables
High level planning	December		Audit Fee letter
Risk assessment and setting of scopes	December/ January	Audit & Governance Committee	
Testing of routine processes and controls	February/April		Audit Plan Progress Report
Value for money conclusion	February/April		
Year-end audit including WGA	July – September	Audit & Governance Committee	Report to those charged with governance Audit report (including our opinion on the financial statements and a conclusion as to whether the Council has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources).
			Audit completion certificate
Reporting	October		Management Letter
Grant claims	December		Report on the audit of grant claims

In addition to the above formal reporting and deliverables we will seek to provide practical business insights and updates on regulatory matters.

5. Independence

5.1 Introduction

The APB Ethical Standards and ISA (UK and Ireland) 260 "Communication of audit matters with those charged with governance", requires us to communicate with you on a timely basis on all significant facts and matters that bear upon our independence and objectivity. The Ethical Standards, as revised in December 2010, require that we communicate formally both at the planning stage and at the conclusion of the audit, as well as during the course of the audit if appropriate. The aim of these communications is to ensure full and fair disclosure by us to those charged with your governance on matters in which you have an interest.

Required communications				
Planning stage	Final stage			
 The principal threats, if any, to objectivity and independence identified by Ernst & Young (EY) including consideration of all relationships between the you, your affiliates and directors and us; The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality review; The overall assessment of threats and safeguards; Information about the general policies and process within EY to maintain objectivity and independence. 	 A written disclosure of relationships (including the provision of non-audit services) that bear on our objectivity and independence, the threats to our independence that these create, any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed; Details of non-audit services provided and the fees charged in relation thereto; Written confirmation that we are independent; Details of any inconsistencies between APB Ethical Standards, the Audit Commission's Standards, Guidance and 			
	Commission's Standing Guidance and your policy for the supply of non-audit services by EY and any apparent breach of that policy; and An opportunity to discuss auditor independence issues.			

During the course of the audit, we are also required to communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of safeguards put in place, for example, when accepting an engagement to provide non-audit services.

We also provide information on any contingent fee arrangements, the amounts of any future services that have been contracted, and details of any written proposal to provide non-audit services that has been submitted;

We ensure that the total amount of fees that EY and our network firms have charged to you and your affiliates for the provision of services during the reporting period, analysed in appropriate categories, are disclosed.

5.2 Relationships, services and related threats and safeguards

We highlight the following significant facts and matters that may be reasonably considered to bear upon our objectivity and independence, including the principal threats, if any. However we have adopted the safeguards noted below to mitigate these threats along with the reasons why they are considered to be effective.

Self-interest threats

A self-interest threat arises when EY has financial or other interests in your entity. Examples include where we have an investment in your entity; where we receives significant fees in respect of non-audit services; where we need to recover long outstanding fees; or where we enter into a business relationship with you. At the time of writing, there are no long-outstanding fees.

We believe that it is appropriate for us to undertake permissible non-audit services and we will comply with the policies that you have approved and that are in compliance with the Audit Commission's Standing Guidance.

A self interest threat may also arise if members of our audit engagement team have objectives or are rewarded in relation to sales of non-audit services to you. We confirm that no member of our audit engagement team, including those from other service lines, has objectives or is rewarded in relation to sales to you, in compliance with Ethical Standard 4.

There are no other self interest threats at the date of this report.

Self-review threats

Self-review threats arise when the results of a non-audit service performed by EY or others within the EY network are reflected in the amounts included or disclosed in the financial statements.

There are no self-review threats at the date of this report.

Management threats

Partners and employees of EY are prohibited from taking decisions on behalf of management of your entity. Management threats may also arise during the provision of a non-audit service in relation to which management is required to make judgements or decision based on that work.

There are no management threats at the date of this report

Other threats

Other threats, such as advocacy, familiarity or intimidation, may arise.

There are no other threats at the date of this report.

Overall Assessment

Overall we consider that the safeguards that have been adopted appropriately mitigate the principal threats identified and we therefore confirm that EY is independent and the objectivity and independence of Maria Grindley, your audit engagement partner and the audit engagement team have not been compromised.

5.3 Other required communications

Ernst & Young (EY) has policies and procedures that instil professional values as part of firm culture and ensure that the highest standards of objectivity, independence and integrity are maintained.

Details of the key policies and processes in place within EY for maintaining objectivity and independence can be found in our annual Transparency Report which the firm is required to publish by law. The most recent version of this Report is for the year ended 29 June 2012 and can be found here:

UK 2012 Transparency Report

Appendix A Fees

A breakdown of our agreed fee is shown below.

	Planned Fee 2012/13	Actual Fee 2011/12	Explanation of variance
	£'000	£'000	
Total Audit Fee – Code work	114,000	200,200	Fee Reduced by Audit Commission
Certification of claims and returns*	36,850	74,309	Fee Reduced by Audit Commission
Non-audit work (provide details)	0	0	

The agreed fee presented above is based on the following assumptions:

- Officers meeting the agreed timetable of deliverables;
- We are able to rely on the work of internal audit as originally planned;
- The level of risk in relation to the audit of accounts in consistent with that in the prior year;
- No significant changes are made by the Audit Commission to the use of resources criteria on which our conclusion will be based;
- Our accounts opinion and use of resources conclusion being unqualified;
- ► Appropriate quality of documentation is provided by the audited body; and
- ► There is an effective control environment.

If any of the above assumptions prove to be unfounded, we will seek a variation to the agreed fee. This will be discussed with you in advance.

Fees for the auditor's consideration of correspondence from the public and formal objections will be charged in addition to the scale fee.

*Our fee for the certification of grant claims is based on the indicative scale fee set by the Audit Commission.

Appendix B UK required communications with those charged with governance

There are certain communications that we must provide to the Audit & Governance Committee of audited clients. These are detailed here.

Required communication	Reference
Planning and audit approach Communication of the planned scope and timing of the audit, including any limitations. Significant findings from the audit	Audit Plan
Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures	Report to those charged with governance
Any significant difficulties encountered during the audit	
Any significant matters arising from the audit that were discussed with management	
Written representations that we are seeking	
Expected modifications to the audit report	
Any other matters if significant to the oversight of the financial reporting process	
Findings and issues regarding the opening balance on initial audits	
Misstatements	Report to those charged with
Uncorrected misstatements and their effect on our audit opinion	governance
► The effect of uncorrected misstatements related to prior periods	
A request that any uncorrected misstatement be corrected	
In writing, corrected misstatements where they are significant	
Fraud ► Enquiries of the Audit & Governance Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the Council	Report to those charged with governance
Any fraud that we have identified or information we have obtained that indicates a fraud may exist	
A discussion of any other matters related to fraud	
Related parties Significant matters arising during the audit in connection with the Council's related parties, including where applicable:	Report to those charged with governance
Non-disclosure by management	
Inappropriate authorisation and approval of transactions	
Disagreement over disclosures	
Non-compliance with laws and regulations	
Difficulty in identifying the party that ultimately controls the entity	
External confirmations	Report to those charged
Management's refusal to allow us to request confirmations	with governance
Inability to obtain relevant and reliable audit evidence from other procedures Consideration of laws and regulations	Report to those charged with
Audit findings on non-compliance where material and believed to be intentional. This communication is subject to compliance with legislation on tipping off	governance
Enquiry of the Audit & Governance Committee into any possible instances of non- compliance with laws and regulations they know about, where they may have a material effect on the financial statements	
Independence	Audit Plan
Communication of all significant facts and matters bearing on Ernst & Young's objectivity and independence Communication of key elements of the audit engagement partner's consideration of	Report to those charged with governance

Required communication

Reference

independence and objectivity such as:

- The principal threats
- Safeguards adopted and their effectiveness
- An overall assessment of threats and safeguards
- Information about the general policies and process within the firm to maintain objectivity and independence

For listed companies, communication of minimum requirements as detailed in the ethical standards:

- Relationships between Ernst & Young, the audited body and senior management
- Services provided by Ernst & Young that may reasonably bear on the auditors' objectivity and independence
- Fees charged by Ernst & Young analysed into appropriate categories such as statutory audit fees, certification work fees, other non-audit service fees
- A statement of compliance with the ethical standards
- The Audit & Governance Committee should also be given an opportunity to discuss matters affecting auditor independence

Going concern

Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:

- Whether the events or conditions constitute a material uncertainty
- Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements
- The adequacy of related disclosures in the financial statements

Significant deficiencies in internal controls identified during the audit

Report to those charged with governance

Report to those charged with

Audit Plan

governance

Group audits

- An overview of the type of work to be performed on the financial information of the components
- An overview of the nature of the group audit team's planned involvement in the work to be performed by the component auditors on the financial information of significant components
- Any instances where the group audit team's evaluation of the work of a component auditor gave rise to a concern about the quality of that auditor's work
- Any limitations on the group audit, for example, where the group engagement team's access to information may have been restricted
- Fraud or suspected fraud involving group management, component management, employees who have significant roles in group-wide controls or others where the fraud resulted in a material misstatement of the group financial statements

Opening Balances (initial audits)

Findings and issues regarding the opening balance of initial audits

Certification work on grants

Summary of certification work and findings

Report to those charged with governance

Annual Certification Report to those charged with governance, and Management Letter if considered necessary

Fee Information

- Breakdown of fee information at the agreement of the initial audit plan
- Breakdown of fee information at the completion of the audit

Audit Plan

Report to those charged with governance and Management Letter if considered necessary

Appendix C Detailed scopes

Our objective is to form an opinion on the group's consolidated financial statements under International Standards on Auditing (UK and Ireland).

We set audit scopes for each reporting unit which, when taken together, enable us to form an opinion on the group accounts. We take into account the size, risk profile, changes in the business environment and other factors when assessing the level of work to be performed at each reporting unit.

- ► Full scope: locations deemed significant based on size and those with significant risk factors are subject to a full scope audit, covering all significant accounts and processes using materiality levels assigned by the Ernst & Young audit team for purposes of the consolidated audit. Procedures are full-scope in nature, but may not be sufficient to issue a stand-alone audit opinion on the local statutory financial statements (as materiality thresholds support to the consolidated audit).
- Specific scope: locations where only specific procedures are performed by the local audit team, based upon procedures, accounts or assertions identified by the Ernst & Young, Reading audit team.
- Limited scope: limited scope procedures primarily consist of enquiries of management and analytical review. On-site or desk top reviews may be performed, according to our assessment of risk.

Once we have concluded the initial planning discussions with the group auditors of Barton LLP, we will issue Group Audit Instructions to ensure the efficient co-ordination of the audit across the group and to confirm which of these approaches we will take. We plan to issue these instructions by the end of March 2013.

UK required communications with those charged with governance

Ernst & Young LLP

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