



AUDIT & ACCOUNTS COMMITTEE
27 January 2021

ITEM 8

Report sponsor: Strategic Director of Corporate Resources
Report author: Head of Internal Audit

Redmond Review - Update

Purpose

- 1.1 To provide an update on the Redmond Review published in September 2020, including the response of the Ministry of Housing, Community and Local Government to the review and to highlight other evidence that supports Sir Tony Redmond's findings.

Recommendations

- 2.1 To note the report.

Reasons

- 3.1 To keep Committee members updated on developments relating to their terms of reference/portfolio.

Supporting information

- 4.1 A report was brought to the September meeting of this Committee on Sir Tony Redmond's Independent review into the oversight of local audit and the transparency of local authority financial reporting. (The Redmond Review). The response of the Ministry of Housing, Communities and Local Government (MHCLG) was published on 17th December 2020.
- 4.2 The response from MHCLG summarises what it sees as the 3 key problems highlighted by the Redmond Review:
 - Current local audit arrangements do not meet the policy objectives underpinning the Local Audit and Accountability Act 2014. The review identified weaknesses in the functioning and value of local audit, the timeliness of its findings and how these are considered and managed by local authorities;
 - Market fragility. The review highlighted how local audit is an unattractive market for audit firms and individual auditors to operate within. Sir Tony indicated that "without prompt action... there is a significant risk that the firms currently holding local audit contracts will withdraw from the market" ('Redmond Review' (2020), p.1).

- Absence of system leadership. The introduction of the localised audit framework in the 2014 Act spread roles and responsibilities for local audit across multiple organisations. The review felt this has contributed to a lack of coherency and makes resolving the weaknesses in the system challenging.

In addition, the Redmond Review highlighted that the statutory accounts prepared by local authorities are widely agreed to be 'impenetrable to the public' ('Redmond Review' (2020), p.4), limiting how effectively taxpayers can judge the performance of their authority.

4.3 MHCLG states in its response that it is also important to highlight that, since the Review was published, further evidence has underlined some of the challenges which Sir Tony Redmond identified:

- In October 2020, the Financial Reporting Council (FRC) issued its first inspection findings into the quality of major local audits. The FRC reviewed 15 audits across the seven largest audit firms, covering both the financial statement opinion and value for money conclusion, and found that 60% required improvement.
- Recognising the significant pressure on local authorities because of Covid-19, the department extended the deadline for the publication of audited 2019/20 accounts to 30 November. Despite this extended deadline, 265 audits remained outstanding for 2019/20 accounts.
- The Public Interest Reports for Nottingham (published in August) and for Croydon (October) provide evidence of poor engagement with local audit and suggest that these councils did not fully grip issues raised by auditors.

4.4. Sir Tony made 23 recommendations relating to the quality, timeliness and sustainability of local audit, and the transparency of local authority accounts. The MHCLG has grouped its response into 5 themes:

1. Action to support immediate market stability (recommendations 5, 6, 8, 10, 11)
2. Consideration of system leadership options (recommendations 1, 2, 3, 7, 13, 17)
3. Enhancing the functioning of local audit, and the governance for responding to its findings (recommendations 4, 9, 12, 18)
4. Improving transparency of local authorities' accounts to the public (recommendations 19, 20, 21, 22)
5. Action to further consider the functioning of local audit for smaller bodies (recommendations 14, 15, 16, 23)

4.5. Annex A from the MHCLG's response which summarises its response to each recommendation is re-produced as Appendix 1 to this report.

4.6 MHCLG’s response concentrates on the Redmond review’s central proposal on the establishment of a new independent regulator for local audit – the Office of Local Audit and Regulation (OLAR). The department’s concern is that the creation of a new overarching body would mark a significant departure from the Local Audit and Accountability Act 2014. The MHCLG states that the “Department remains committed to a locally-led audit regime which enables genuine local accountability by residents and taxpayers. We do not wish to re-create the costly, bureaucratic and over-centralised Audit Commission.” MHCLG has said that it will work with stakeholders in the industry to develop a new local audit approach with more details to be published in the spring.

Public/stakeholder engagement

5.1 None

Other options

6.1 None

Financial and value for money issues

7.1 None

Legal implications

8.1 None

Other significant implications

9.1 None

This report has been approved by the following people:

Role	Name	Date of sign-off
Legal		
Finance		
Service Director(s)		
Report sponsor	Strategic Director of Corporate Resources	15/1/21
Other(s)		

Background papers:	None
List of appendices:	Appendix 1 – Response of MHCLG to Redmond Report – Annex A

Annex A: Summary of MHCLG's response to the recommendations made by the Redmond Review

Action to support immediate market stability (recommendations 5, 6, 8, 10, 11)

Recommendation	MHCLG Response
5. All auditors engaged in local audit be provided with the requisite skills and training to audit a local authority irrespective of seniority.	Agree; we will work with key stakeholders to deliver this recommendation
6. The current fee structure for local audit be revised to ensure that adequate resources are deployed to meet the full extent of local audit requirements.	Agree; we will look to revise regulations to enable PSAA to set fees that better reflect the cost to audit firms of undertaking additional work
8. Statute be revised so that audit firms with the requisite capacity, skills and experience are not excluded from bidding for local audit work.	Part agree; we will work with the FRC and ICAEW to deliver this recommendation, including whether changes to statute are required

Recommendation**MHCLG Response**

10. The deadline for publishing audited local authority accounts be revisited with a view to extending it to 30 September from 31 July each year.

Part agree; we will look to extend the deadline to 30 September for publishing audited local authority accounts for two years, and then review

11. The revised deadline for publication of audited local authority accounts be considered in consultation with NHSI(E) and DHSC, given that audit firms use the same auditors on both Local Government and Health final accounts work.

Agree

Consideration of system leadership options (recommendations 1, 2, 3, 7, 13, 17)

Recommendation**MHCLG response**

1. A new body, the Office of Local Audit and Regulation (OLAR), be created to manage, oversee and regulate local audit with the following key responsibilities:

- procurement of local audit contracts
- producing annual reports summarising the state of local audit
- management of local audit contracts
- monitoring and review of local audit performance
- determining the code of local audit practice
- regulating the local audit sector

We are considering these recommendations further and will make a full response by spring 2021.

2. The current roles and responsibilities relating to local audit discharged by the:

We are considering these recommendations further and will make a full response by spring 2021.

Recommendation	MHCLG response
<ul style="list-style-type: none"> - Public Sector Audit Appointments (PSAA) - Institute of Chartered Accountants in England and Wales (ICAEW) - FRC/ARGA - The Comptroller and Auditor General (C&AG) to be transferred to the OLAR 	
<p>3. A Liaison Committee be established comprising key stakeholders and chaired by MHCLG, to receive reports from the new regulator on the development of local audit.</p>	<p>We are considering these recommendations further and will make a full response by spring 2021.</p>
<p>7. That quality be consistent with the highest standards of audit within the revised fee structure. In cases where there are serious or persistent breaches of expected quality standards, OLAR has the scope to apply proportionate sanctions.</p>	<p>We are considering these recommendations further and will make a full response by spring 2021.</p>
<p>13. The changes implemented in the 2020 Audit Code of Practice are endorsed; OLAR to undertake a post implementation review to assess whether these changes have led to more effective external audit consideration of financial resilience and value for money matters.</p>	<p>We are considering these recommendations further and will make a full response by spring 2021.</p>
<p>17. MHCLG reviews its current framework for seeking assurance that financial sustainability in each local authority in England is maintained.</p>	<p>We are considering these recommendations further and will make a full response by spring 2021.</p>

Enhancing the functioning of local audit, and the governance for responding to its findings (recommendations 4, 9, 12, 18)

Recommendation	MHCLG response
<p>4. The governance arrangements within local authorities be reviewed by local councils with the purpose of:</p> <ul style="list-style-type: none">- an annual report being submitted to Full Council by the external auditor- consideration being given to the appointment of at least one independent member, suitably qualified, to the Audit Committee- formalising the facility for the CEO, Monitoring Officer- Chief Financial Officer (CFO) to meet with the Key Audit Partner at least annually.	<p>Agree; we will work with the LGA, NAO and CIPFA to deliver this recommendation</p>
<p>9. External Audit recognises that Internal Audit work can be a key support in appropriate circumstances where consistent with the Code of Audit Practice.</p>	<p>Agree; we will work with the NAO and CIPFA to deliver this recommendation</p>
<p>12. The external auditor be required to present an Annual Audit Report to the first Full Council meeting after 30 September each year, irrespective of whether the accounts have been certified; OLAR to decide the framework for this report.</p>	<p>Agree; we will work with the LGA, NAO and CIPFA and other key stakeholders to deliver this recommendation, including whether changes to statute are required</p>
<p>18. Key concerns relating to service and financial viability be shared between local auditors and inspectorates including Ofsted, Care Quality Commission and HMICFRS prior to completion of the external auditor's annual report.</p>	<p>Agree; we will work with other departments and the NAO to deliver this recommendation</p>

Improving transparency of local authorities' accounts to the public (recommendations 19, 20, 21, 22)

Recommendation	MHCLG response
19. A standardised statement of service information and costs be prepared by each authority and be compared with the budget agreed to support the council tax/precept/levy and presented alongside the statutory accounts.	Agree; we will look to CIPFA to develop a product through consultation with local government. We will work with CIPFA to deliver this recommendation
20. The standardised statement should be subject to external audit.	Agree; we will work with CIPFA, the LGA and the NAO to deliver this recommendation
21. The optimum means of communicating such information to council taxpayers/service users be considered by each local authority to ensure access for all sections of the communities.	Agree; we will work with the LGA and CIPFA to deliver this recommendation
22. CIPFA/LASAAC be required to review the statutory accounts, in the light of the new requirement to prepare the standardised statement, to determine whether there is scope to simplify the presentation of local authority accounts by removing disclosures that may no longer be considered to be necessary.	Agree; we will look to CIPFA to deliver this recommendation

Action to further consider the functioning of local audit for smaller bodies (recommendations 14, 15, 16, 23)

Recommendation	MHCLG response
14. SAAA considers whether the current level of external audit work commissioned for Parish Councils, Parish Meetings and Internal Drainage Boards (IDBs) and Other Smaller Authorities is proportionate to the nature and size of such organisations.	Agree; we will look to SAAA to deliver this recommendation
15. SAAA and OLAR examine the current arrangements for increasing audit activities and fees if a body's turnover exceeds £6.5m.	We are considering this recommendation further and will make a full response by spring 2020
16. SAAA reviews the current arrangements, with auditors, for managing the resource implications for persistent and vexatious complaints against Parish Councils.	Agree; we will look to SAAA to deliver this recommendation
23. JPAG be required to review the Annual Governance and Accountability Return (AGAR) prepared by smaller authorities to see if it can be made more transparent to readers. In doing so the following principles should be considered: - whether "Section 2 – the Accounting Statements" should be moved to the first page of the AGAR so that it is more prominent to readers - whether budgetary information along with the variance between outturn and budget should be included in the Accounting Statements - whether the explanation of variances provided by the authority to the auditor should be disclosed in the AGAR as part of the Accounting Statements.	Agree; we will work to JPAG to deliver this recommendation