



Notice of a meeting of Audit, Compliance and Governance Committee

Wednesday, 11 November 2020

6.00 pm

**Virtual WEBEX video conference via YouTube -
<https://www.youtube.com/user/cheltenhamborough>**

Membership	
Councillors:	Steve Harvey (Chair), David Willingham (Vice-Chair), Matt Babbage, Jonny Brownstein, Flo Clucas, Tony Oliver and Jo Stafford

The Council has a substitution process and any substitutions will be announced at the meeting

Agenda

1.	APOLOGIES	
2.	DECLARATIONS OF INTEREST	
3.	MINUTES OF THE LAST MEETING 22 July 2020	(Pages 3 - 8)
4.	PUBLIC AND MEMBER QUESTIONS These must be received no later than 12 noon on the fourth working day before the date of the meeting	
5.	ANNUAL REVIEW OF RISK MANAGEMENT POLICY Ann Wolstencroft, Programme & Governance Manager	(Pages 9 - 32)
6.	CLEARVIEW - LIVE DEMONSTRATION Ann Wolstencroft, Programme & Governance Manager	
7.	THE AUDIT FINDINGS FOR CHELTENHAM BOROUGH COUNCIL Grant Thornton	(Pages 33 - 64)
8.	STATEMENT OF ACCOUNTS INCLUDING LETTER OF REPRESENTATION Andrew Knott, Chief Accountant (Publica)	(Pages 65 - 200)
9.	INTERNAL AUDIT PLAN AND PROGRESS REPORT	(Pages

		Lucy Cater, Assistant Director (SWAP Internal Audit Services)	201 - 248)
10.		COUNTER FRAUD UPDATE AND FUTURE WORK PROVISION Emma Cathcart, Counter Fraud Unit Manager (Counter Fraud Unit)	(Pages 249 - 260)
11.		WORK PROGRAMME	(Pages 261 - 262)
12.		ANY OTHER ITEM THE CHAIRMAN DETERMINES TO BE URGENT AND REQUIRES A DECISION	
13.		DATE OF NEXT MEETING 20 January 2021	

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Audit, Compliance and Governance Committee

Wednesday, 22nd July, 2020
6.00 - 7.30 pm

Attendees	
Councillors:	Steve Harvey (Chair), David Willingham (Vice-Chair), Victoria Atherstone, Matt Babbage, Jonny Brownsteen and Tony Oliver
Also in attendance:	Lucy Cater (Assistant Director – SWAP), Aditi Chandramouli (Grant Thornton), Councillor Hay (Cabinet Member Finance), Paul Jones (Executive Director Finance and Assets), Barrie Morris (Grant Thornton)

Minutes

1. APOLOGIES

Councillor Stafford had given her apologies.

2. DECLARATIONS OF INTEREST

None were declared.

3. MINUTES OF THE LAST MEETING

The minutes of the last meeting had been circulated with the agenda.

Councillor Willingham highlighted a typo on page 4, where Y238 should have read Y2038. This would be amended.

Upon a vote it was unanimously

RESOLVED that the minutes of the meeting held on the 22 January 2020, as amended, be agreed and signed as an accurate record.

4. PUBLIC AND MEMBER QUESTIONS

None received.

5. ANNUAL INTERNAL AUDIT OPINION 2019/20

Lucy Cater, Assistant Director at South West Audit Partnership (SWAP) introduced the Internal Audit Annual Report and Opinion 2019/20. At the time of drafting the opinion; three audits were in progress, six were yet to commence and 34 had been completed. These completed audits had resulted in 60 recommendations, though none were Priority 1 and only 30 were Priority 2, and in respect of the areas reviewed in the year, SWAP were able to offer 'Reasonable Assurance'.

The Assistant Director gave the following responses to member questions:

- In terms of the Planning Process and Complaints Procedure audit, the report was now being drafted and initial contact had been made with the relevant Officers with a view to progressing this soon.
- It had not yet been possible to undertake any audit work remotely, as many SWAP staff had been redeployed to provide support in other areas including those that were assisting with the payment of grants to businesses. It was likely that going forward audit work would be undertaken remotely where it was possible to get access to the relevant officers and information.
- The report summarised work that had been done and therefore it was not appropriate to amend the executive summaries to reflect the fact that the authority had recently signed up to the Tech Charter; but this could be included in the next Audit Plan.
- The executive summary would suggest that the Business Continuity Plans had proved to be adequate.
- The audit of corporate culture had been deferred and whilst it would be undertaken, it could be that this would not be done before 2021/22.

A member felt the Annual Opinion demonstrated that the Audit Committee was fulfilling the role that it was meant to do. He also took the opportunity to thank Officers for their hard work and dedication during these unprecedented and difficult times. He commended them for having worked together, doing different roles, at times working unusual hours and for endeavouring to involve members at every stage, to ensure continuity of services.

No decision was required.

6. AUDIT PLAN PLUS ADDENDUM AS PRESENTED TO LAST AUDIT COMMITTEE

Barrie Morris from Grant Thornton introduced the External Audit Plan plus addendum. The audit had been significantly impacted by COVID and caused some previously identified risks to increase further. The pandemic has had a significant impact on the valuation of land and buildings at the year end, including investment properties and surplus assets, meaning that it was necessary for GT to increase the volume and scope of their audit work to ensure that adequate audit and challenge underpinned any valuations. The Financial Reporting Council (FRC) has also indicated that it expects all external auditors to provide additional challenge and scepticism in areas such as journals, estimates, financial resilience and information provided by the audited entity, and all of these areas of additional work are likely to incur an additional fee. The start of the statutory audit had also been impacted by the pandemic and though the council had not yet provided financial statements, GT were working with Officers to meet the revised deadlines of 31 August for the preparation and 30 November for the audited accounts. Neither parties envisaged that meeting these new deadlines would be a problem, in fact the council were aiming to have their financial statements prepared in advance of the 31 August deadline. In recognition of the unprecedented uncertainty that the Covid-19 outbreak posed, a new significant risk had been added, Covid-19 and the risks and proposed responses were detailed at page 71 of the pack. Finally, it was highlighted that enhanced independence disclosures were being made because a previous employee of GT had been appointed to a role within Publica Ltd. He confirmed that appropriate safeguards had been put in place as

a result of this unusual situation and had been keen to provide these assurances to members.

Barrie Morris provided the following responses to member questions:

- References to PPE within the report related to Plant, Property and Equipment rather than Personal Protective Equipment.
- A risk relating to the Redcar and Cleveland Council ransomware attack had not yet been identified but this was something GT could take away from the meeting.
- The need to revalue assets was born of the need to produce the financial statements. Uncertainty from valuers was raising a red flag for Shareholders that some assets may not be correctly valued, as a result of their cash flow value or future rental streams having reduced drastically. He noted that this specific issue was covered in the 'Going Concern' report later on the agenda and took the opportunity to give credit to the Director of Finance and Assets, for an in-depth report which had fed into returns made to central government.
- GT were not expert valuers and therefore had to engage experts in order to provide appropriate challenge to management and their experts in terms of the valuation of assets.

The Director of Finance and Assets reminded members that this authority's asset portfolio was diverse and therefore it did not face the level of exposure as authorities that had invested heavily in retail property. He also felt it was worthwhile acknowledging the delay to the audit, which was usually completed by the end of May and presented to the committee in July, which the Government had now pushed back to August and November. He had aimed to have a draft set of accounts completed by the end of June, but this had proved overly ambitious given the changes to some mandatory grants, as well as some of the additional grants that the council needed to process. He thanked GT for being as accommodating as they had and for agreeing a revised deadline and noted that the committee were still scheduled to meet in September to review the draft accounts, but it could be that there would be a need to defer this meeting by a month.

The Chairman felt that it was a credit to the authority that it invested locally and commended this approach and also took the opportunity to thank GT for flagging the issue of the conflict of interest pertaining to the ex-employee, which had the potential to cause problems if unchecked.

No decision was required.

7. AUDIT PROGRESS REPORT AND SECTOR UPDATE

Aditi Chandramouli introduced the Audit Progress Report and Sector Update, as circulated with the agenda. Work on the interim audit commenced in March, but after a week on site, the second week of the audit had to be undertaken remotely off-site due to the lock-down requirements introduced by the UK Government. She thanked the finance team for accommodating this. The findings of this interim work and the impact of these findings on the accounts audit approach were detailed at page 79 of the pack and it was noted that no weaknesses had been identified at this stage. In terms of sector updates, these included updates on Covid and Local Government, but most importantly, the

New Code of Audit Practice, the most significant changes of which were in relation to the value for money (VfM) arrangements.

There were no member questions and no decision was required.

8. INFORMING THE AUDIT RISK ASSESSMENT - THOSE CHARGED WITH GOVERNANCE

The Director of Finance and Assets introduced the paper, explaining that in previous years the committee had been presented with two documents, a set of management responses, as well as a response from the Chair, Councillor Harvey. Combining the two had proved much easier to complete and he felt it resulted in a far more comprehensive response.

In response to a question from a member, the Director of Finance and Assets confirmed that the Council did have sufficient staff, with appropriate skills and experience and where needed would seek external specialist advice, as it did with the Climate Change analysis report undertaken last year. He acknowledged the significant commitment in terms of Climate Change, made as part of the budget which was agreed back in February, but stressed that with the current financial uncertainty, it would be remiss of him to agree certain expenditure until there was more financial stability, and whilst finances shouldn't always be a barrier, in this case they had to be.

No decision was required.

9. ASSESSMENT OF THE GOING CONCERN

The Director of Finance and Assets pointed out that in his 30 years of working for Cheltenham Borough Council this had been his most challenging period as a finance professional, and with this report he had endeavoured to strike the right balance between honesty and positivity. He acknowledged the media speculation regarding the viability of councils up and down the country and he felt strongly that it was imperative that there be a record of how this Council was affected. The assessment of the going concern was a report that he wrote every year and in laymans terms was an assessment of whether an authority, its functions and services would continue in operational existence for the foreseeable future. This report would normally sit in the background and was of little interest to anyone but clearly it had a greater prominence this year. For that reason he agreed with the Cabinet Member for Finance that this report should be presented to the Audit, Compliance and Governance Committee. He was pleased to be able to confirm, with a great deal of confidence, that CBC was indeed a going concern.

Clearly, these were unprecedented times, affecting every local authority in the country but what made Cheltenham different was, firstly, it's estimated additional costs from this pandemic, excluding slippage in savings programmes amounted to [circa](#) £1.3m and to date, it had received just over £1.3m in this financial year. Of more concern to CBC was the lost income from sales, fees and charges; as members would be aware, the vast majority of CBCs losses related to car parking. It was therefore pleasing to hear the commitment from Government a few weeks ago that stated where losses were more than 5% of a council's planned income from sales, fees and charges, the Government would cover 75p for every pound lost. His calculation suggested that CBC would receive just over £712k for every million reported as lost income. MHCLG were

due to release the detail on how this data would be captured and he would provide further updates when they are available.

He had mentioned previously that CBC held reserves that could be put forward to offset these losses and he stressed that there may be a need to reprioritise some of the initiatives planned in the February budget to ensure the Council remained financially viable. £1.5m of our reserves had already been identified that could be applied to meet the current fallout from COVID-19 and in addition the council had made debt overpayments in excess of £1m that could be applied if needed (subject to getting formal agreement with the external auditor); this represented £2.5m of CBC money already identified if the need arose. In summary, he had confidence that the in-year projected losses were covered based on information and work undertaken to date and so he moved onto the longer term viability of the council. Some income-streams like car parking may never return to the pre-COVID levels and so work continued looking at alternative options to replace that income through the use of CBCs significant asset portfolio. Fundamentally, this was why Cheltenham was so unique compared to many of its neighbouring authorities; it had assets valued at in excess of £0.5Bn and was the overwhelming reason why it would continue to be a going concern. It had significant land ownership including the recently purchased 120 acres at West Cheltenham, owned many assets including an airport, 4,000 houses, the freehold interest in the Regent Arcade, a Sainsbury's supermarket, almost 2 Hundred Thousand square feet of prime office accommodation, a depot, parades of secondary retail outlets, industrial units, start-up units, theatres, cultural venues, a Lido, a leisure centre, multiple car parks and many more. He noted that a team of Officers had been tasked with re-energising the asset portfolio and making sure they were being used to maximum effect and advised that some assets may be considered surplus to requirements, such as the Arle Nursery site and in any such instance the council would look to generate maximum receipts from sale proceeds and this work would also provide resilience to the future prosperity of the Council.

The Director of Finance and Assets gave the following responses to member questions:

- The biggest concern for this council was if parking income never returned to pre-Covid levels, with a 10% reduction equating to a £0.5m loss and levels currently only at 40% of what they once were. Without the wish to scaremonger, without a financial settlement that covered some of these losses, the council would have difficult decisions to make.
- The reality was that car parks represented real estate assets with a significant value but any reduction in the use/income would present opportunities for alternative uses.
- The Council paid huge business rates on car parks and would still face those liabilities if it were to offer free parking as was being suggested by some members.
- He was not best placed to answer questions pertaining to public liability insurance for volunteers and would have to seek a response from the relevant Officer(s) outside of this meeting.
- Business Rates and Council Tax were separate. Council Tax, or the Collection Fund as it was also known, [previously](#) ran at a surplus, with growth throughout the year. Next year however, the fund was likely to be in deficit, which was unprecedented, though it was noted that GCC and the

Police took the highest precepts with only a small percentage coming to CBC. Business rates were different and would be reported to Government as cash losses. Retail, leisure and hospitality properties had been given 100% business rate relief for the year 2020/21 and properties that did not qualify had the option to make payment plan requests. The Governments Section 31 Grant would reimburse some losses and they had suggested that any deficit could be spread over 3 years, but more details were yet to be released. The business rate revaluation had been postponed until 2022 but it was certain that in the future, business rates would be less of the income generator that it once was.

A number of members took the opportunity to thank the Director of Finance and Assets for his in-depth and honest report, as well as thanking him, his finance team and the Cabinet Member Finance for the huge amount of work they had been doing and for the financial stewardship which had placed the council in the stronger than most, financial position it found itself in.

The committee noted the conclusion that Cheltenham Borough Council was a going concern.

10. WORK PROGRAMME

The work programme had been circulated with the agenda.

Aditi from Grant Thornton advised that given the revised timescales discussed earlier in the meeting, the Audit Findings report would be taken to the September meeting, rather than the Annual Audit letter, though there was still a decision to be taken about whether this meeting (22 September) should be deferred.

11. ANY OTHER ITEM THE CHAIRMAN DETERMINES TO BE URGENT AND REQUIRES A DECISION

There were no urgent items requiring a decision.

12. DATE OF NEXT MEETING

The next meeting was scheduled for the 23 September 2020, at present.

Steve Harvey
Chairman

Cheltenham Borough Council

Audit, Compliance and Governance Committee – 11 November 2020

Annual Review of Risk Policy

Accountable member	Cabinet Member Corporate Services, Councillor Alex Hegenbarth
Accountable officer	Executive Director of People and Change, Darren Knight
Executive summary	The Risk Policy has been amended to reflect some changes in the categories and the introduction of the Clearview risk management software. The Executive Director of People and Change has started a review of CBC approach to Risk Management the completion of which has been delayed due to our response to COVID19. This policy will be reviewed again on completion of the review.
Recommendations	That Audit Committee; <ul style="list-style-type: none"> Consider and approve the Risk Management Policy for 2020-21 Appendix 2

Financial implications	None specific arising from the report recommendations Contact officer: Paul Jones, Executive Director Finance & Assets Email: Paul.Jones@cheltenham.gov.uk Tel: 01242 775154
Legal implications	None specific arising from the report recommendations Contact officer: Sarah Farooq, One Legal Email; sarah.farooqi@tewkesbury.gov.uk Tel: 01684 272012
HR implications (including learning and organisational development)	None specific arising from the report recommendations Contact officer: Julie McCarthy, HR Manager – Operations & Service Centre Publica Group Ltd Email; julie.mccarthy@publicagroup.uk Tel: 01242 264355
Property implications	None
Key risks	The lack of a robust approach to the management of risks and opportunities could result in ill-informed decision making and non-achievement of the Council's aims and objectives at both a strategic and service level.
Corporate & community plan implications	None
Environmental and climate change implications	None

1. Background

- 1.1** Risk management is the culture, process and structures that are directed towards effective management of potential opportunities and threats to the Council achieving its priorities and objectives.
- 1.2** The Council's Risk Management Policy sets out the approach to risk management including the roles and responsibilities for Officers and elected Members. The policy also details the processes in place to manage risks at corporate, divisional and project levels.
- 1.3** The Council's ICT services are managed by Publica; this includes the identification of risk and threats to our IT infrastructure and data, this is managed in accordance to the requirements of the Public Sector Network framework. They are therefore not covered by the CBC Risk Management Policy but there are mechanisms in place to transfer or share risks between partners.
- 1.4** The Risk Management Policy is made available to Executive Leadership Team, Corporate Management Team, Corporate Governance Group and to Project Managers. All policy, guidance and advice documents made available to all officers and elected Members through the risk management page on the intranet.
- 1.5** The identification and assessment of risk is part of the annual Corporate Strategy and Action Planning process. The Council's Corporate Management considers and reviews strategic risks on a monthly basis. Both of these activities include the development of risk mitigation actions designed to reduce the likelihood and/or consequences of adverse events occurring. By understanding risks, the council can be more confident about undertaking ventures which produce larger gains, such as jointly providing services with other councils.
- 1.6** The council's approach to risk management is overseen by the Audit Committee. This committee annually reviews the Risk Management Policy, considers internal audits reports on risk management, and also receives reports from external audit on the budget, accounts, grants and Value for Money.
- 1.7** The Corporate Risk Register is reviewed monthly by the Executive Leadership Team and made available to Cabinet Members.

2. Review of Risk Management

- 2.1** It has been an unprecedented year due to COVID 19 and the challenges facing Cheltenham Borough Council continue to increase. We continue to work on the priorities set out in our Corporate Plan 2019-2023 as well as those identified in our COVID19 recovery strategy.
- 2.2** Our review of risk management has started with the introduction of our Clearview software however managing our response to the COVID19 pandemic and subsequent recovery work has meant the review is behind schedule however we have started to pick this work back up now as a priority.
- 2.3** The Council's Governance Manager has become a registered Management of Risk (MOR) Practitioner and with the next steps being the development the Council's Risk Improvement Plan based on the MOR framework.

3. 2020 Policy Review

- 3.1** The Risk Management Policy states the need for an annual formal review.

3.2 The Risk Management Policy was last reviewed and approved by the Audit Committee in July 2019.

3.3. There is are two key recommendations for change and these are:

- Increased risk control options.
- Probability levels decreased from 6 to 5.

3.4 It is therefore recommended that Audit Committee consider the policy and make any recommendations that it feels necessary or re-approve it for the 2020-21 year.

4. Consultation and feedback

4.1 The Executive Leadership Team and The Corporate Governance Group are routinely consulted on the content of the risk registers.

5. Performance management – monitoring and review

5.1 The Executive Leadership Team and The Corporate Governance Group routinely monitor risks in line with the Risk Management Policy.

Report author	Contact officer: Ann Wolstencroft Email: ann.wolstencroft@cheltenham.gov.uk Tel: 01242 264158
Appendices	1. Risk Assessment 2. Risk Management Policy

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	If the council does not have a robust and effective risk management approach to the management of risks and opportunities then it could result in ill-informed decision making and non-achievement of the Council's aims and objectives at both a strategic and service level.	Executive Director of People and Change	11/11/2020	4	2	8	Reduce	Undertake a Review of Councils Risk Management approach and ensure Policy is kept up to date and that the processes supporting it are robust and delivered by the decision-makers.	31/03/2021	Governance Manager	
Explanatory notes Impact – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical) Likelihood – how likely is it that the risk will occur on a scale of 1-5 (1 being unlikely and 5 being high probability) Control - Reduce											

November 2020~~April 2019~~ - Risk Management Policy



Document control

Document Location;S:\Corporate\Risk\riskmanagementpolicy

Reviewed by; Audit Committee and Corporate Governance Group

Version Number	Version Date	Summary of Changes
1.0	14/02/2009	New Policy
1.2	19/04/2011	revised policy
1.3	23/01/2012	Draft Revised policy
1.4	01/04/2012	Confidential risks and new score card
1.5	01/04/2013	Additional requirement re commissioning
1.6	26/03/2014	Audit Committee
1.07	25/03/2015	Audit Committee
1.08	23/03/2016	Audit Committee
1.09	22/03/2017	Audit Committee
1.10	24/03/2018	Audit Committee
1.11	24/07/2019	Audit Committee
1.124	24/11/2020	Audit Committee

This document has <u>will</u> been distributed to;	
Public website, Audit committee and Cabinet	1.0
Public website, Audit Committee and Cabinet	12 /04/2011
Audit Committee (agreed) All CBC staff, Public website and Cabinet members	21/03/2012
Audit Committee All CBC staff, Public website and Cabinet members	21/03/ 2013
Audit Committee All CBC staff, Public website and Cabinet members	26/03/2014
Audit Committee All CBC staff, Public website and Cabinet members	26/03/2015
Audit Committee All CBC staff, Public website and Cabinet members	01/04/2016
Audit Committee All CBC staff, Public website and Cabinet members	01/04/2017
Audit Committee All CBC staff, Public website and Cabinet members	24/07/2019

Audit Committee All CBC staff, Public website and Cabinet members	1224/07/2020
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Cheltenham Borough Council - Our Approach to Risk Management

The council believes that risks need to be managed, rather than avoided and that a rigorous approach to all aspects of risk management is an integral part of good management practice.

Through having a sound risk management process we will ensure:

- That the council continues to achieve its objectives and outcomes and sustainable improvement in services;
- That the council is developing and maintaining a safe and healthy environment for the public, and for its employees; and
- That the council reduces the number and cost of insurance claims.
- That by mitigating risk we will make processes safer and more effective which in turn will reduce costs and make us more efficient.

Risk is defined in line with ISO 31000:2009 Risk Management Principles and Guidelines.

There are many definitions of risk and risk management. The contemporary definition set out in ISO 3100 is that risk is the “effect of uncertainty on objectives” where uncertainty can be either positive or negative.

Risk Management is defined as ‘the culture processes and structures directed towards realising opportunities whilst managing adverse effects’. Its purpose is not to eliminate risk, but to understand it so as to take advantage of the upside and minimise the downside.

Everyone has a role to play in our risk management policy. Combining shared leadership with a team approach will help contribute to the success of integrated risk management.

Our Expectations / Commitments

- The ~~Corporate Management Team~~ ~~Corporate Management~~ Executive Leadership Team will own and maintain the corporate risk register which will be updated on a monthly basis.
- Directors will ensure that there is an up to date ~~divisional-directorate~~ or project risk register for their ~~divisions-teams~~ using ~~the template on the intranet~~ our risk management system. This should be reviewed at least quarterly ~~management team meetings~~. Any ~~divisional-directorate~~ or project risk that has a score of 16 or greater will be referred to CMT-ELT for consideration for inclusion on the Corporate Risk Register
- Service Managers will document risks to meeting their team objectives.
- All committee reports that require a decision should be accompanied by a risk assessment.
- All project and programme managers will assess the strategic and operational risks associated with the programme or project objectives.
- We will ensure that partnership working is part of our risk management approach; partnerships should identify the risks to achieving their objectives and the council will document the risks to working in partnerships.

Part One – Our approach to risk

1. Introduction

- 1.1 The aim of this policy is to set out Cheltenham Borough Council's approach to risk and the management of risk. It is presented in three parts; the first is our approach to risk management; the second outlines the process for risk management and the third part sets out roles and responsibilities.
- 1.2 The council believes that risk needs to be managed, rather than avoided and that a rigorous approach to all aspects of risk management is an integral part of good management practice. Through having a sound risk management process we will ensure:
- That the council continues to achieve its objectives and outcomes and sustainable improvement in services;
 - That the council is developing and maintaining a safe and healthy environment for the public, and for its employees; and
 - That the council reduces the number and cost of insurance claims.
 - That by mitigating risk we will make processes safer and more effective which in turn will reduce costs and make us more efficient.
- 1.3 Risk is defined as
- "An uncertain event or set of events which, should it occur, will have an effect upon the achievement of objectives, within the lifetime of the objective."*
- 1.4 Risk can be both negative and positive, but it tends to be the negative side that we focus on and score. This is because some things can be harmful, such as putting lives at risk or a cost to an individual or the organisation in financial terms.
- 1.5 Negative risk is represented by potential events that could harm the project. In general, these risks are to be avoided and can be measured in terms of impact and likelihood. Positive risk, on the other hand, refers to risk that we initiate because we see a potential opportunity, along with a potential for failure.
- 1.6 There are two examples of positive risks. The risk could either be a positive experience, or the reason for taking the risk has rewards that are well worth it. For example the risk could make us enhance our performance or reputation, or by taking a different option we could improve exceed corporate objectives, improve efficiency, reduce costs or improve income by a greater amount than was originally identified. See also section 8 about monitoring and managing risk.
- 1.7 Risk management is
- "The activities required to identify and control exposure (negative risk) to uncertainty which may impact on the achievement of objectives". Or/and to use Positive risks to help us exceed our objectives.*
- 1.8 From these two definitions, we can see that risk management is focused on the risk to meeting our objectives.
- 1.9 Given the definitions above, the council will assess, monitor and manage risks to the achievement of its objectives, including:
- Our corporate objectives – as set out in our corporate strategy;
 - ~~Directorate~~visional objectives;

- Service team objectives;
- Project and programme objectives; and

1.10 This policy sets out how we will identify, assess and manage risks, how we will report risk and how we will support risk management.

1.11 Everyone has a role to play in our risk management policy. Combining shared leadership with a team approach will help contribute to the success of integrated risk management. More information on roles and responsibilities is given in part 3.

2. Identifying, assessing and managing risks

2.1 The council will take a rounded view on what constitutes a risk. The starting point is that a risk could be anything, from an internal or external source, that poses a threat to the achievement of our objectives.

2.2 In terms of external sources, changing circumstances can have a significant impact on our ability to deliver our objectives. The environment we operate in is not stable and is in constant flux. Good risk management is about trying to anticipate these changes and put in place actions to respond to the resulting risks by minimising the likelihood and/or impact. Our view of the source of external risks could include the following:

- Local and national political change
- Local and national economic circumstance
- Social change
- Technological change
- Climate change
- Legislative change
- Environment
- Complying with equality considerations
- Change in the organisational structure for local government
- Changing expectations/needs from customer/citizens/residents
- Change in how we are resourced
- Recommendations from assessment or review

2.3 In terms of internal source of risks, the ability of the council to continue to deliver its objectives is dependent on the following:

- Finance - sufficient finances in place to deliver service;
- Human resource - enough skilled, competent, experienced, healthy, motivated staff in the right place at the right time to deliver the service;
- Premises - the most appropriate environment from which to deliver the service;
- Technology – the most appropriate form of technology to support service delivery;
- Procurement – the most appropriate service/resource provider in place to deliver the service objectives (if service out-sourced);
- Legal/Contractual – the most appropriate form of contract to guide service delivery;
- Partners – commitment from appropriate other partners (both internal and external) to deliver the service;
- Changing priorities – a stable environment in terms of organisation priorities, clear objectives and manageable level of complexity;
- Information – an exchange of reliable information (internal and external) that is accurate and timely on which decisions can be fairly and correctly based.

- Safety and security of assets.

- 2.4** It is also worthwhile noting that because we have adopted a commissioning approach whereby the council may deliver services through different organisational models, and then we must ensure that these arrangements are included within our risk management processes. These risks can then be included in the same register as all other risks to the delivery of the objective. When it is necessary to the achievement of an objective to procure products and services, the risk/s to the objective if the procurement process fails should also be identified and managed. When these ownership and management mechanisms have been defined risk owners need to ensure that effective monitoring and governance controls are in place to protect council assets.
- 2.5** When we commission the delivery of a service or enter into a shared service/inter authority agreement, providers are expected to have a range of risk management processes in place in accordance with any agreement with the Council, should they identify a significant risk that may have an impact on the Council they must advise the Client officer. The Client officer will then decide on the best course of action e.g. include on either the Corporate or ~~Directorate~~ ~~visional~~ ~~r~~ Risk ~~r~~ Registers.
- 2.6** In addition we would expect all programme and project managers to assess the strategic and operational risks associated with the programme or project objectives before the project is selected and approved. Risks should be reviewed as the project proceeds and included within the Corporate Risk Register if the risk is likely to impact upon the authority as a whole.
- 2.7** All committee reports that require a decision should contain a description of the options available and a risk assessment for each of them. These risks must relate to the objectives of the report ~~-topic~~.
- 2.8** Risk management should not be seen as a separate management function; it is a core part of good management.
- 2.9** The council have separate and detailed Health and Safety policies that provide advice about how this type of risks should be identified and managed. They can be found on the intranet.

2.40 Defining and scoring risk

2.42.10 Once risks have been identified using the information given above, the council would like risks to be defined in a consistent way using the "cause and effect" approach (see Part 2, 5.3 for more information). Risks will be then scored for impact and likelihood using the risk scorecard. (The risk score is the multiplication of impact and likelihood.)

2.42.11 The initial score will be based on current circumstances and referred to as the 'original' score. After controls have been actioned, the risk will be scored again. This score will be referred to as the 'current' score.

2.43 Tolerance and controls

2.44.12 The scored risk can then be assessed against the council's tolerance levels. Currently we have three levels which set out the council's attitude to that particular risk. The three tolerance levels are coloured red, amber and green. Risks that are scored in the red and amber areas ~~(7 and above)~~ will require action.

2.45 The council then has ~~eight~~ ~~four~~ options on how to control the risk;

- Reduce the risk
- Accept the risk
- Transfer the risk to a third party
- Avoid the risk
- Prepare a contingent plan
- Share the risk
- Enhance the risk
- Exploit the risk ~~Close the risk~~

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~~2.16~~2.13 The decision on how to control the risk will be made by the risk owner or an appropriate senior officer depending on where the score falls in the tolerance areas and the costs associated with the control.

2.17 Monitoring and managing risk

~~2.18~~2.14 As risk management is an integral part of good management all identified risks should be recorded and managed through either the ~~Divisional~~Directorate Risk Register or the Corporate Risk Register. Corporate Risks are monitored monthly and ~~Divisional~~Directorate Risk Registers will be monitored quarterly at routine ~~Divisional~~Directorate Team meetings. Any ~~divisional~~Directorate risk that has a score of 16 or greater will be referred to CMT-ELT for consideration for inclusion on the Corporate Risk Register

~~2.19~~2.15 The Corporate Risk Register is available to all elected Members and employees through the intranet and is collectively monitored and managed by the ~~Corporate Management Team~~Executive Leadership Team

2.20 Recording risk

~~2.21~~2.16 The risk registers should be used to inform decision making and resource allocation and should be updated as required to meet agreed monitoring arrangements.

~~2.22~~2.17 ~~Divisional~~Directorate Risk Registers are the responsibility of Directors with the individual risks being assigned to officers within the division (or across ~~departments~~divisions where appropriate.)

~~2.23~~2.18 Any new risk must be agreed by CMT-Directors / Managers before being added to the register. ~~Risks cannot be deleted from the register unless they have agreed that it can be closed.~~ Mitigating actions and deadlines can be updated by the risk owner at anytime prior to the monthly review ~~at CMT.~~

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3. Risk registers & reporting risk

The corporate risk register

- 3.1 The 'corporate risk register' contains strategic risks to the organisation
 - The longer-term risks to the delivery of outcomes (ambitions) are described within the Corporate Strategy. The outcomes are linked directly to specific improvement actions which again are described within the Corporate Strategy but are individually risk assessed and managed within the Corporate Risk Register.
 - Headline risks associated with exceptional circumstances.
- 3.2 The Section 151 officer is responsible for ensuring that the Council has an effective Risk Management Policy
- 3.3 ~~Executive Leadership Corporate Management~~ Team will own and maintain the Corporate Risk Register and associated actions which will be considered and updated by them on a monthly basis.
- 3.4 A copy of the updated corporate risk register will be provided informally to Cabinet Members following review by CMT-ELT so that they can discuss the risks with the risk owners or managers.
- 3.5 A copy of the Corporate Risk Register will be published on the Transparency page of the Councils website immediately following CMT-ELT and Informal Cabinet reviews.

~~3.6 At every ELT meeting there is a standard agenda item that is called Is it Safe this provides all of the Directors with an opportunity to raise any new risks and issue that they feel could impact on the Council. These risks issues are discussed and if necessary new risks are added either to the Project/Divisional Risk Register or the Corporate Risk Register~~

~~3.7~~ 3.6 People identifying Risks and Issues need to understand the difference between them. We must identify "risks" as "risks" and not call them "issues" to do so only causes confusion. The key difference is that an "issue" has already occurred and a "risk" is a potential issue that may or may not happen and can impact the project positively or negatively. We plan in advance and work out mitigation plans for high-impact risks. A risk can become an issue, but issue is not risk – it has already happened. For all issues at hand, we need to act immediately to resolve them.

~~3.8~~ 3.7 The corporate risk register will provide the necessary assurance for the annual governance statement.

~~3.9~~ 3.8 An annual report (~~March~~) followed up by a six monthly risk monitoring report (~~September~~) to Cabinet

~~3.10~~ 3.9 Risk management reporting should be co-ordinated with continuous routine performance monitoring.

~~3.11~~ 3.10 All corporate confidential risks will be recorded in the normal way but they will be redacted either in full or in part from the corporate risk register so as to protect any personal data, prevent the disclosure of legally privileged information or exempt from publication any other information which should be so exempted. Further guidance on confidential risk can be found at paragraph 9.3.

3.12 Divisional~~Directorate~~, service area and programme/project team risk registers

~~3.13~~ 3.11 Each division needs to take a proactive approach to risk management making sure that it is embedded as a part of the good management of the division. Each division should compile and maintain a ~~divisional~~Directorate risk register that captures the risks to the delivery of its objectives.

~~3.14~~ 3.12 Each service team, project/programme may also have a risk register which capture risks to their respective objectives. The important thing is to make sure that risk is discussed and debated at management teams and that risks are then identified and managed.

~~3.15~~ 3.13 It is also important to note that those particularly high scoring ~~divisional~~Directorate risks will not necessarily have a place on the corporate risk register unless it has a direct impact on our corporate objectives. In this case, the cause or effect may be different and the impact and likelihood scores must be scored appropriately. If the overall score for a ~~divisional~~Directorate or project risk is 16 or over then it must be brought to the attention of ~~GMT~~ELT for consideration for inclusion on the Corporate risk Register.

~~It is possible that the same risk will appear in more than one register. The impact or likelihood may be different against the different objectives and should therefore be scored accordingly. Where actions to control a risk fall to another division, it is that division's responsibility to implement that action and the risk owner's responsibility to remain updated and manage the risk accordingly.~~

Reporting risks

~~3.16~~ 3.14 Monthly risk monitoring reports will be presented to the ~~Corporate Management Team~~Executive Leadership Team and informally to Cabinet Members for discussion with Risk Owners. There will be an annual report to Cabinet and to Audit Committee which will include:

- The most significant corporate risks faced by the council;

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- The associated management actions which are considered urgent;
- The resource implications of any management actions; and
- An overview of how significant risks may affect the Council's ability to meet its ambitions.

Risk management reporting should be co-ordinated with continuous routine performance monitoring.

4. Supporting risk management

4.4 Risk management co-ordination

4.24.1 The risk management policy, including any guidance notes, will be reviewed once a year by the Audit Committee and the responsible Director and when necessary, updated to incorporate further development in risk management processes and/or organisational change.

4.34.2 Where the council has established groups who have responsibility for risk, they should include detail about their role in the terms of reference or constitution for the group.

4.4 Training

4.54.3 The requirement for risk management training which will ensure that elected members and officers have the skills required to identify, evaluate, control and monitor the risks associated with the services they provide, or govern should be identified through the appraisal process.

4.64.4 Risk Management training for staff and elected Members will be delivered through an elearning tool on the ~~learning gateway~~ Learning Management System.

4.74.5 Where required, training in corporate governance, of which risk management is a part, should be identified through the induction process for all new employees and members.

4.8 Communication

4.94.6 The risk management culture within the council must support open and frank discussion on risks to the Council. Risk Owners and Risk Managers must provide opportunities to employees and members not normally involved with risk management with the opportunity for comment and challenge.

4.104.7 Risk should be considered at least quarterly by management team and service team meetings as part of good management practice. When necessary, new and emerging risks, significant change and where control actions are significantly succeeding or failing should be discussed.

4.114.8 It is the responsibility of the risk owner to communicate and discuss risk and control actions with other relevant officers, including those from other divisions.

4.124.9 If the cause of a risk or the failure of an objective or activity has the potential to impact on another objective or activity, it is the duty of the responsible officer to communicate that cause or failure to the owner of the effected objective or action.

4.134.10 Information and guidance on risk management will be available to all employees with computer access via the intranet and shared drive. Employees without computer access should speak to their manager for a printed copy.

4.144.11 Employees will be kept up to date on risk management progress and good practice through management meetings, team briefings and the intranet.

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Part 2 - Process & Guidance

5. How to identify and define risks

5.1 Identifying risks is about asking:

- what could happen that would impact on the objective?
- when and where could it happen?
- how and why could it happen?
- how can we prevent or minimise the impact or likelihood of this happening?

5.2 What risks are identified and who you involve in the process will depend on whether you are looking at a specific team area or at a more strategic, organisational level. It is best practice to involve others in identifying risk as this gives you different perspectives on the same situation. Those involved must be clear about what objective is being risk assessed. Approaches to identify risks can include:

- Brainstorming on possible risks in a facilitated session;
- Mapping out the processes and procedures; asking staff to identify risks at each stage;
- Drawing up a checklist of risks and asking for feedback.

5.3 Risks should then be defined using the 'if then' (or the cause and effect or likelihood and impact) approach and given a reference number.

5.4 Risks should be specific and worded carefully and concisely and should not consist of a single word.

5.5 Risks should be outcome based and if one cause creates several impacts, each impact should be identified separately. This is because each might result in a different score and control.

6. How to score risk

6.1 The council has produced a scorecard to help risk owners score the risk by assessing impact and likelihood (effect & cause).

Impact

6.2 To help assess the impact (effect), we have identified a scale of impact from 1 to 5;

- 1 - Negligible
- 2 - ~~Minor~~Low
- 3 - Moderate
- 4 - Major
- 5 - Critical

6.3 Risk owners are encouraged to decide the scale of the impact by considering what type of impact the risk has on the objective, using the risk types Financial, Employee, Capacity, VFM, H&S and wellbeing, Business continuity, Contractual Governance, Reputation, Customer satisfaction, Governance, Performance forecasting and Corporate Strategy. . A full description of impact type and scoring is detailed in the 'impact scorecard' which should be used when assessing risk.

Likelihood

6.4 To help the risk owner assess the likelihood score (cause), we have identified ~~5~~6 categories of likelihood that the risk will occur during the lifetime of the objective. These are:

Score	Likelihood	Probability	
1	Rare	0-9%	Less than 10% chance of occurrence

2	Unlikely	10-34%	10% to 34% chance of occurrence
3	Possible	35-64%	35% to 64% chance of occurrence
4	Likely	65-89%	65% to 89% chance of occurrence
5	Almost Certain	90-100%	90% or greater chance of occurrence

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Risk score

- 6.5 The risk score is a multiplication of impact and likelihood.
- 6.6 On occasion it is possible to have a risk that proposes more than one score of impact, e.g. a single cause that could have minimal cost implications, maximum cost implications or anywhere in between. In this instance, we advise that you score and manage the risk according to the most likely scenario. Using the areas of tolerance may also help.

7. Selecting a risk control and understanding tolerance

- 7.1 The scored risk can then be assessed against the council's tolerance levels. Currently we have three levels which set out the council's attitude to that particular risk. The three tolerance levels are coloured red, amber and green. Risks that are scored in the red and amber areas ~~(above 7)~~ will require action.

Score	Colour	Action/need to apply control	Responsibility
1-6	Green	Acceptable, subject to monitoring.	Risk owner
7-15	Amber	Needs active management	Risk owner
16-25	Red	Requires close urgent attention	Risk owner / <u>ELT</u>
25- 30	Red	Requires urgent attention and routine discussion with Cabinet Leads	Risk Owner

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- 7.2 The decision on how to control the risk will be made by the risk owner or an appropriate senior officer depending on where the score falls in the tolerance areas and the costs associated with the control.

- 7.3 The council has ~~four~~eight options on how to control the risk;

Control	Description
Accept	The Accept option means that CBC 'takes a chance' that the risk will occur, with its full impact if it did.
Avoid	Avoid a threat is about making the uncertain situation certain by removing the risk. This can be achieving by removing the cause of a threat.
Contingent plan	This option involves preparing contingent plans now, but not taking action now. Accept but make a plan for what we will do if situation changes.
Reduce	This option chooses definite action now to change the probability and/or impact of the risk. The term mitigate is relevant when discussing reduction.
Share	Share is different to transfer as it seeks for multiple partners to share the risk on a pain /gain basis.
Transfer	Transfer the risk is an option that aims to pass part of the responsibility to a third party. Insurance is the classic form of transfer.
Enhance	Making the opportunity more likely to occur.

Exploit	Exploit an opportunity to gain positive impacts from the risk.
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8. Monitoring and managing risk

- 8.1 As risk management is an integral part of good management our view is that risks should be reviewed by ~~Corporate Management~~ Executive Leadership Team and revised as and when actions prove to be successful or unsuccessful and when new information becomes available.

Progress of action	Further action
High	Current action successful – redirect resources
Medium	Current action not as effective as first hoped make changes or think of new action.
Low	Current action unsuccessful need new action.

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- 8.2 The identification of risk may raise the question not to pursue a course of action. If this decision is made, it must be clearly documented.
- 8.3 The identification of risk may raise a success or positive learning point. This should be communicated to those who may benefit.
- 8.4 Actions to mitigate the risk need to be identified early and the monitoring must consider if they are being effective. If they are not then the project team, programme board or CMT need to identify new mitigating actions.

9. Risk registers

- 9.1 All risks will be recorded on the corporate risk register.
- 9.2 A risk register will record:
- Risks identified - to an objective, including a reference code and specified using "if...& then...";
 - Original risk assessment and score based on impact and likelihood;
 - Risk owner;
 - Date raised;
 - ~~Controls & applied;~~
 - Actions to control the risk;
 - The officer responsible for the action;
 - An indication as to whether the mitigating actions are on target
 - The action status including progress notes;
 - Current risk assessment and score once the action has been implemented.
 - The date the risk was last reviewed

9.3 Confidential Risk

- 9.4.9.3 The Corporate Risk Register is a public document and is reported to Cabinet and Audit Committees. These reports may contain risks that contain confidential information and have been determined as being an "exempt item" under Schedule 12A of the Local Government Act 1972,

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- ~~9.59.4~~ All corporate confidential risks will be recorded in the normal way but they will be redacted either in full or in part from the corporate risk register to ensure compliance with relevant legislation, to protect any personal or commercially sensitive data and the divulgence of any confidential legal advice.
- ~~9.69.5~~ Advice on the wording and inclusion of any confidential risks within the Corporate Risk Register must be sought from One Legal.
- ~~9.79.6~~ The Corporate Management Team may decide that they require additional assurance in respect of a particular confidential risk because it is not in the public domain, in which case it can be referred to the Corporate Governance group. Where they are referred they will be discussed with the risk owner and the outcome referred back to the CMT.
- ~~9.89.7~~ A process chart relating to the management of confidential risks is available on the Intranets Risk Management page.

Part 3 - Roles and Responsibilities

Everyone has a role to play in our risk management policy. Combining shared leadership with a team approach will help contribute to the success of integrated risk management.

10. Elected members

- 10.1** All elected members have risk management responsibility; they should promote the desired culture essential for successful risk management, acknowledging risk management as a strategic and operational tool to further the council's objectives. All should feel secure that, by identifying risk in their area, they are doing so within a corporate framework that is robust and easily understood.
- 10.2** The risk assessment included in all reports, that require a decision, that are brought to council, cabinet and committees should be used to inform decision making and should be revisited to ensure the risks are being managed.
- 10.3** They will also participate in training workshops to maintain an up-to-date understanding of how CBC manages risk.

~~10.4~~ Audit Committee

~~10.5~~~~10.4~~ Audit Committee will endorse the council's corporate risk management policy, and at least annually, monitor and review the effectiveness of risk management systems and its contribution to corporate governance arrangements.

~~10.6~~~~10.5~~ Audit Committee will also seek assurance from the internal audit team that risks are being managed in an appropriate manner and by the terms of this policy.

~~10.7~~ Overview and Scrutiny

The Overview and Scrutiny Committee may request to review the risk register at any time and scrutiny task groups may want to examine any risks relating to a particular project. Any recommendations from scrutiny would be made to Cabinet or Council as appropriate.

~~10.8~~ Cabinet and Council

~~10.9~~~~10.6~~ The Cabinet will approve the Risk Management Policy.

~~10.10~~~~10.7~~ Cabinet and Council, as decision-making bodies, will be made aware of risks associated with any decision taken to them. They will have the responsibility to ensure that any risks to a report or project they sign off are managed and should request a revision of previously identified risks as and when necessary.

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~~10.14~~**10.8** The Corporate Risk Register is provided informally to Cabinet Members so that they can monitor them and the progress of mitigating action.

~~10.12~~**10.9** The Corporate Services Cabinet Member has risk management identified as part of their portfolio. They have responsibility to ensure that their cabinet colleagues consider risk when setting policy and making decisions. These risks should be revisited to identify how they are being managed.

~~10.13~~**10.10** Individual cabinet members should seek assurance that the risk management process is being met in reference to their respective portfolios through discussions with Directors.

~~10.14~~**10.11** Cabinet Members can suggest new risks and discuss the management of any risk with the appropriate Director or Risk Owner

11. Officer responsibilities

11.1 The **Chief Executive** and **Executive Leadership Team** have strategic responsibility for the risk management policy and collectively oversee the council's effective management of risk. In their role as 'coach', they will advise and support Directors, Senior Managers, Programme and Project Managers to ensure that risk is managed consistently and in line with this policy.

11.2 The Executive Leadership Team are responsible for setting tolerance levels. The risk owner is empowered by Executive Leadership Team to make decisions about the control of the risk, depending on the risk score and what tolerance area it falls within.

11.3 They will consider corporate risk as part of developing and implementing the council business plan and corporate strategies, projects and programmes.

11.4 The ~~Corporate Management~~**Executive Leadership Team** are collectively responsible for the management of risks recorded on the Corporate Risk Register

11.5 Directors are responsible for managing risks to the delivery of the objectives of their own division, jointly with their service managers. These risks will be managed in accordance with this policy, using the risk register template attached.

11.6 The **Executive Director People and Change** is responsible for minimising the overall cost of insurance claims which do arise and supporting the risk management programme by supplying any advice and data to the Board.

11.7 The **Executive Director People and Change** is responsible for monitoring the implementation and effectiveness of this risk management policy and for reviewing compliance with controls introduced by all other directors to collectively manage risks through the Corporate Management Team. Any responsibilities delegated to internal audit will be covered in the annual internal audit programme.

11.8 The **Audit Partnership Manager** is responsible for ensuring that where corporate risks are identified in the Annual Audit Plan they are cross referenced to the Corporate Risk Register.

11.9 The **Client officer** for Shared or Commissioned Service(s) will be responsible for ensuring that any external organisation that provides a service(s) for the Council will have a documented Risks Management Process that is appropriate for the size and complexity of that organisation.

11.10 The Client Officer will ensure that any external organisations risk management process covered in 11.9 will include the process for that organisation to inform the Council of any risk that either impacts or could impact on the Council.

- 11.11 The Client Officer will make the appropriate ~~Corporate Management~~Executive Leadership Team Lead Commissioner aware of any risk that could score 16 or above on the CBC score card or in their mind would have a significant risks to CBCs finances or reputation.'

The Governance Board

- 11.12 The Governance Board is consulted on proposed amendments to the Risk Management Policy and the Corporate Risk Register.
- 11.13 The ~~Corporate Management~~Executive Leadership Team can request that the Governance Board review and challenge any risk or group of risks to ensure that they are being recorded, scored and monitored correctly. This additional review process which can be found on the intranet relates to confidential risks and is designed to provide additional assurance to CMT-ELT and the risk owners that they are being managed correctly.

12. Programme and Project Managers

- 12.1 Ensure there is a process for identifying, managing and communicating risks to programme and project objectives and benefits
- 12.2 Ensure that programme and project teams carry out regular risk assessment
- 12.3 Ensure that any risk scoring 16 or above (CBC score card) is escalated to CMT-ELT Governance Board and considered for inclusion on the Corporate Risk Register. Managers have the discretion to bring to the attention of their Director or Risk Owner any risk scoring below 16 if they consider that there is a need for CMT-ELT Governance Board to be made aware of it.

13. Service managers

- 13.1 **Service managers** are responsible for identifying and managing risks to the objectives of their service team in line with this policy. The council encourages managers to identify, understand and manage risk, and learn how to accept risk within the applicable tolerance level.
- 13.2 They should ensure that their teams carry out risk assessment, where appropriate, as a routine part of service planning and project management, including reporting to members.
- 13.3 Ensure that any risk scoring 16 or above (CBC score card) is escalated to ~~CMT-Governance Board~~ELT and considered for inclusion on the Corporate Risk Register. Managers have the discretion to bring to the attention of their Director or Risk Owner any risk scoring below 16 if they consider that there is a need for ~~CMT-Governance Board~~ELT to be made aware of it.

14. All council employees

- 14.1 The identification of risk relies on input from teams and individuals.
- 14.2 A 'Risk Owner' is the owner of a risk and will manage that risk accordingly. This will involve maintaining awareness of how control actions are progressing.
- 14.3 All actions identified to control a risk will be assigned to an individual officer who will be called the 'Risk Manager'.

Appendix 1 Risk Scorecard Risk Owners and Managers must use the following score card as a guide to accessing the impact and Likelihood of any identified risk;.

Effect	Risk Category	Impacts <i>Please note When drafting a risk description always describe the cause and effect i.e If... then ...</i>
Negligible	Financial	Risk (<£50K Capital) or (Revenue <£25K p.a.) Define the value and period, in relation to revenue.
	Employee	Low morale is contained within team and managed.
	Capacity	Short term capacity issue not affecting service delivery.
	VFM	Negligible impact on value for money. (Revenue <£25K p.a.)
	H&S wellbeing	Risk to personal health & safety and general wellbeing.
	Business continuity	Brief interruption of service provision.
	Contractual Governance	Minor breakdown of shared services or contracts.
	Reputation	Negligible media coverage/minor complaints.
	Customer satisfaction	Minimal impact on delivery customer needs.
	Governance	Poor governance/Internal/ control but zero impact on outcomes.
	Performance	Targets are missed with no impact on objectives/outcomes.
	Risks specific to delivery of Corporate Strategy	
	Environmental outcome	Negligible impact on our environmental outcome - Cheltenham's environmental quality and heritage is protected, maintained and enhanced
	Economic outcome	Negligible impact on our economic outcome - Sustain and grow Cheltenham's economic and cultural vitality
	Community outcome	Negligible impact on our community economy - People live in strong, safe and healthy communities
	Business transformation outcome	Negligible impact on our business transformation outcome - Transform our council so it can continue to enable delivery our outcomes for Cheltenham and its residents
Minor	Risk Category	Impacts
	Finance	Risk (£50K to £200K Capital) or (Revenue £25K to £50K p.a.) Define the value and period, in relation to revenue.
	Employee	Some hostility from staff and minor non-cooperation.
	Capacity	Short term capacity issue affecting service provision (define term with risk description).
	VFM	Low impact on value for money. (Revenue £25K to £50K p.a.)
	H&S and wellbeing	Risk to personal health & safety may result in broken bones and short term illnesses.
	Business Continuity	Slightly reduced service provision with marginal disruption.
	Contractual Governance	Some breakdown or shared services or contracts with disruption.
	Reputation	Adverse local media/negative local opinion/formal complaints.
	Customer satisfaction	Some customer needs or expectations may not be met either in time or quality.
	Governance	Governance/Internal/ control has been missed/misunderstood/not up to date resulting in poor decision making.
	Performance	Targets are missed with low impact on objectives/outcomes.
	Risks specific to delivery of Corporate Strategy	
	Environmental outcome	Low impact on our environmental outcome - Cheltenham's environmental quality and heritage is protected, maintained and enhanced
	Economic outcome	Low impact on our economic outcome - Sustain and grow Cheltenham's economic and cultural vitality
	Community outcome	Low impact on our community economy - People live in strong, safe and healthy communities
	Business transformation outcome	Low impact on our business transformation outcome - Transform our council so it can continue to enable delivery our outcomes for Cheltenham and its residents

	Risk Category	Impacts
Moderate	Finance	Risk (£200K to £1M Capital) or (Revenue £50K to £200K p.a.) Define the value and period, in relation to revenue.
	Employee	Industrial action in the short term/staff leaving.
	Capacity	Medium term capacity issues affecting service (define term within risk description).
	VFM	Moderate impact on value for money. (Revenue £50K to £200K p.a.)
	H&S and wellbeing	Risk to personal health & safety includes sustained or major illness of 1 or more people.
	Business Continuity	Services suspended in short term with noticeable disruption.
	Contractual Governance	Collapse of at least one aspect of shared service or contract with moderate disruption or temporary suspended service.
	Reputation	Adverse local & media/members questioned.
	Customer satisfaction	Key customer needs or expectations may not be met either in time or quality.
	Governance	Governance/Internal/ control arrangements failed leading to non-compliance with legislation and policy.
	Performance	Targets are missed with impact on objectives/outcomes.
	Risks specific to delivery of Corporate Strategy	
	Environmental outcome	Moderate impact on our environmental outcome - Cheltenham's environmental quality and heritage is protected, maintained and enhanced
	Economic outcome	Moderate impact on our economic outcome - Sustain and grow Cheltenham's economic and cultural vitality
	Community outcome	Moderate impact on our community economy - People live in strong, safe and healthy communities
	Business transformation outcome	Moderate impact on our business transformation outcome - Transform our council so it can continue to enable delivery our outcomes for Cheltenham and its residents
Major	Risk Category	Impacts
	Finance	Risk (>£1M to £2M Capital) or (Revenue £200K to £500K p.a.) Define the value and period, in relation to revenue.
	Employee	Prolonged industrial action/significant number of staff leaving.
	Capacity	Long term capacity issue affecting service delivery/reputation.
	VFM	Major failure to provide value for money with major risk and external investigation. (Revenue £200K to £500K p.a.)
	H&S and wellbeing	Risk to personal health & safety include loss of life/large scale illness.
	Business Continuity	Service delivery suspended/Priority 1 and Priority 2 ICT systems suspended for long term with major disruption.
	Contractual Governance	Shared service or contract delivery fails with major disruption.
	Reputation	Major media coverage. High level of concern from elected members/officers/public with senior staff position threatened.
	Customer satisfaction	Customer needs or expectations are not met with significant failing in service delivery.
	Governance	Governance arrangements have failed with major reputation/legal implication and cost to recover.
	Performance	Targets missed continuously major impact on objectives/outcomes.
	Risks specific to delivery of Corporate Strategy	
	Environmental outcome	Major impact on our environmental outcome - Cheltenham's environmental quality and heritage is protected, maintained and enhanced
	Economic outcome	Major impact on our economic outcome - Sustain and grow Cheltenham's economic and cultural vitality
	Community outcome	Major impact on our community economy - People live in strong, safe and healthy communities
	Business transformation outcome	Major impact on our business transformation outcome - Transform our council so it can continue to enable delivery our outcomes for Cheltenham and its residents

	Risk Category	Impacts
Critical	Finance	Risk (>£2M Capital) or (>Revenue £500K p.a.) The value and period, in relation to revenue
	Employee	Prolonged industrial action/permanent loss of jobs resulting in inability to deliver services.
	Capacity	Long term capacity putting at risk personnel, assets, reputation and service delivery.
	VFM	Critical failure to provide value for money with risk of external investigation and intervention. (>Revenue £500K p.a.)
	H&S and wellbeing	Risk to personal health & safety includes possibility of multiple fatalities or serious injuries and illness.
	Business Continuity	Total loss of services, ICT systems and other key assets.
	Contractual Governance	Shared service and contract delivery fails, resulting in total loss of service or the decommissioning of delivery model.
	Reputation	Significant local/national media coverage with failure to meet regulatory standard resulting in loss/fine.
	Customer satisfaction	Customer needs or expectations are not met because of complete failure in service delivery.
	Governance	Governance/Internal/ control arrangements failed with reputation/legal/cost implication.
	Performance	If there was a critical failure to deliver on delivery of objectives/outcomes or external investigation and intervention
	Risks specific to delivery of Corporate Strategy	
	Environmental outcome	A Critical impact on our ability to deliver our environmental outcome - Cheltenham's environmental quality and heritage is protected, maintained and enhanced
	Economic outcome	A Critical impact on our ability to deliver our economic outcome - Sustain and grow Cheltenham's economic and cultural vitality
	Community outcome	A Critical impact on our ability to deliver our community economy - People live in strong, safe and healthy communities
	Business transformation outcome	A Critical impact on our ability to deliver our business transformation outcome - Transform our council so it can continue to enable delivery our outcomes for Cheltenham and its residents

Likelihood scorecard

Score	Likelihood	Probability	
1	Rare	0-9%	Less than 10% chance of occurrence
2	Unlikely	10-34%	10% to 34% chance of occurrence
3	Possible	35-64%	35% to 64% chance of occurrence
4	Likely	65-89%	65% to 89% chance of occurrence
5	Almost Certain	90-100%	90% or greater chance of occurrence

The total risk score is the multiplication of impact and likelihood when the risk score has been defined consideration must be given as to the best way to manage it, the following table should be used as a guide.

<i>Code</i>	<i>Risk score</i>	<i>Risk Management view</i>
Red	16 – 25	Must be managed by ELT to reduce risk scores
Amber	7 – 15	Seek to improve the risk score in the short/medium term
Green	1 – 6	Tolerate and monitor within the department

The Audit Findings for Cheltenham Borough Council

Year ended 31 March 2020

02 November 2020



Contents



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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 expressing our opinion on the financial statements. Our audit is not designed to test all internal controls or identify all areas of control weakness. However, where, as part of our testing, we identify control weaknesses, we will report these to you. In consequence, our work cannot be relied upon to disclose all defalcations or other irregularities, or to include all possible improvements in internal control that a more extensive special examination might identify. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. 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.

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Headlines

This table summarises the key findings and other matters arising from the statutory audit of Cheltenham Borough Council ('the Council') and the preparation of the group and Council's financial statements for the year ended 31 March 2020 for those charged with governance.

Covid-19	<p>The outbreak of the Covid-19 coronavirus pandemic has had a significant impact on the normal operations of the group and Council, and measures have been put in place to respond to this, including increased home working for employees.</p> <p>The Council have been closely monitoring the Government response to coronavirus and have been making changes to the way services are delivered to protect frontline services. The Council has felt the impact of factors such as administration of grants to businesses, and has also had to contend with lost income from car parks. The Council has also prepared a Covid-19 Recovery Plan to respond to the lasting impacts of the pandemic.</p> <p>Authorities are still required to prepare financial statements in accordance with the relevant accounting standards and the CIPFA Code of Practice, albeit to an extended deadline for the preparation of the financial statements up to 31 August 2020 and the date for audited financial statements to 30 November 2020</p>	<p>We updated our audit risk assessment to consider the impact of the pandemic on our audit and issued an Audit Plan Addendum on 20 April 2020. In that addendum we reported an additional financial statement risk in respect of Covid -19 and highlighted the impact on our VfM approach. Further detail is set out on page 6.</p> <p>Restrictions for non-essential travel has meant both Council and audit staff have had to undertake the audit remotely. This has included use of video conferencing and sharing screens to remotely view financial systems. The main challenge was around verifying the completeness and accuracy of information produced by the entity. The Authority has engaged with us to ensure that our requirements have been met.</p>
Financial Statements	<p>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 group and Council's financial statements:</p> <ul style="list-style-type: none"> • give a true and fair view of the financial position of the group and Council and its 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. <p>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.</p>	<p>Our audit work was completed remotely during July-October 2020. Our findings are summarised on pages 7 to 10. We have identified three adjustments to the financial statements that have resulted in a £1.227m adjustment to the Group's Comprehensive Income and Expenditure Statement. Audit adjustments are detailed in Appendix C. We have also raised recommendations for management as a result of our audit work in Appendix A. Our follow up of recommendations from the prior year's audit are detailed in Appendix B.</p> <p>Our work is substantially complete and there are no matters of which we are aware that would require modification of our audit opinion or material changes to the financial statements, subject to the outstanding matters set out on Page 5 of this report.</p> <p>We have concluded that the other information to be published with the financial statements is consistent with our knowledge of the Council. The financial statements we have audited represent the period to 31 March 2020 which was at the very beginning of the outbreak of the Covid-19 pandemic.</p> <p>Our anticipated audit report opinion will be unqualified, but includes an Emphasis of Matter paragraph, highlighting a material uncertainty with regards to the valuation of land and buildings, and valuation of the Council's share of property funds in the Gloucestershire Pension Fund, as reported in the financial statements. Our work in relation to the group accounts is currently ongoing, and at the time of writing this report, we have not reached a conclusion regarding the group opinion. We will provide a verbal update at the Audit, Compliance and Governance Committee.</p>

Headlines

This table summarises the key findings and other matters arising from the statutory audit of Cheltenham Borough Council ('the Council') and the preparation of the group and Council's financial statements for the year ended 31 March 2020 for those charged with governance.

Value for Money arrangements	Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report if, in our opinion, the Council has made proper arrangements to secure economy, efficiency and effectiveness in its use of resources ('the value for money (VFM) conclusion').	<p>We have completed our risk based review of the Council's value for money arrangements. We have concluded that Cheltenham Borough Council has proper arrangements to secure economy, efficiency and effectiveness in its use of resources.</p> <p>We have updated our VFM risk assessment to document our understanding of your arrangements to ensure critical business continuity in the current environment. We have not identified any new VFM risks in relation to Covid-19. We therefore anticipate issuing an unqualified value for money conclusion. Our findings are summarised on pages 19 to 21.</p>
Statutory duties	<p>The Local Audit and Accountability Act 2014 ('the Act') also requires us to:</p> <ul style="list-style-type: none"> report to you if we have applied any of the additional powers and duties ascribed to us under the Act; and certify the closure of the audit. 	<p>We have not exercised any of our additional statutory powers or duties.</p> <p>We have completed the majority of work under the Code. The Group Instructions for the Whole of Government Accounts have not been released at the time of writing this report. We will be unable to certify the completion of the audit until we fulfil our responsibilities as set out in the Group Instruction.</p>

Acknowledgements

We would like to take this opportunity to record our appreciation for the assistance and collaboration provided by the finance team and other staff during these unprecedented times. We have worked flexibly with your finance team to complete the audit in the most effective way. We were initially due to begin the audit at the end of June 2020, however due to delays experienced by the finance team, the audit was rearranged for the middle of July. At this stage, a complete draft set of accounts was not available, and we were able to re-schedule the audit to take place in early August 2020. The completed draft financial statements were received on the 31 July. Additionally, the majority of working papers requested were received in early August. We encountered some delays in receiving appropriate evidence to support some sample testing undertaken, however after additional discussions with the finance team, this was resolved and we were able to complete our testing. The quality of working papers received require improvement, and a recommendation has been raised in respect of this in Appendix A.

Audit approach

Overview of the scope of our audit

This Audit Findings Report presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260 and the Code of Audit Practice ('the Code'). Its contents have been discussed with management.

As auditor we are responsible for performing the audit, in accordance with International Standards on Auditing (UK) and the Code, which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

Audit approach

Our audit approach was based on a thorough understanding of the group's business and is risk based, and in particular included:

- an evaluation of the group's internal controls environment, including its IT systems and controls;
- an evaluation of the component/s of the group based on a measure of materiality considering each as a percentage of the group's gross revenue expenditure to assess the significance of the component and to determine the planned audit response. From this evaluation we determined that specified audit procedures for Cheltenham Borough Homes Limited and Gloucestershire Airport were required, which were completed by Bishop Fleming LLP and Hazlewoods LLP respectively; and
- substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks

We have had to alter our audit plan, as communicated to you on 20 April 2020 to reflect our response to the Covid-19 pandemic.

Conclusion

We have substantially completed our audit of your financial statements and subject to outstanding queries being resolved, we anticipate issuing an audit opinion following the Audit, Compliance and Governance Committee meeting on 11 November 2020. The audit opinion is anticipated to be unqualified in respect of the Council. Our work in relation to group accounts is currently not complete, and at the time of writing this report, we have not reached a conclusion regarding the group opinion. We are currently awaiting the outcome of the component auditors work on Gloucestershire Airport Limited and we understand that they have requested management to undertake additional modelling around their going concern assessment, in light of the uncertainties introduced by the Covid-19 pandemic, particularly in relation to the aviation industry. We will provide a verbal update at the Audit, Compliance and Governance Committee. Further detail around this is provided on page 11 of our report. The outstanding items referred to above include:

- completion of welfare benefits testing;
- completion of group audit procedures;
- review of responses to queries on a small number of areas, such as PPE addition related party transactions and the Expenditure and Funding Analysis note;
- receipt and review of the Pension Fund Auditor assurances;
- receipt of management representation letter; and
- review of the final set of financial statements.

Materiality

Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Materiality levels remain the same as reported in our audit plan.

	Group Amount (£)	Council Amount (£)	Qualitative factors considered
Materiality for the financial statements	1.595m	1.573m	<p>This equates to 2% of your 2019/20 gross expenditure for the year. This was determined as the appropriate benchmark for determining materiality. Our knowledge of the environment at Cheltenham Borough Council has led us to the conclusion that the risk of fraud is low, hence 2% is deemed an appropriate percentage to apply to the benchmark.</p> <p>This is consistent with that reported in our Audit Plan in March 2020.</p>
Performance materiality	1.196m	1.180m	<p>This equates to 75% of materiality.</p> <p>This is consistent with that reported in our Audit Plan in March 2020.</p>
Trivial matters	80k	79k	<p>ISA 260 (UK) defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria. We have determined this to be 5% of materiality.</p> <p>This is consistent with that reported in our Audit Plan in March 2020.</p>
Materiality for senior officers' remuneration	12k	12k	<p>Senior Officers' Remuneration is a balance which require a lower materiality due to its sensitive nature.</p> <p>This is consistent with that reported in our Audit Plan in March 2020.</p>

Significant audit risks

Risks identified in our Audit Plan

Auditor commentary

Covid- 19

We have performed the following work in relation to this risk:

- worked with management to understand the implications the response to the Covid-19 pandemic had on the organisation's ability to prepare the financial statements and update financial forecasts and assessed the implications on our audit approach. No changes were made to materiality levels previously reported. The draft financial statements were provided on 31st July 2020;
- liaised with other audit suppliers, regulators and government departments to co-ordinate practical cross-sector responses to issues as and when they arose. Examples include the material uncertainty disclosed by the Group's property valuation expert, and material uncertainty in relation to pension fund property assets;
- evaluated the adequacy of the disclosures in the financial statements that arose in light of the Covid-19 pandemic;
- evaluated whether sufficient audit evidence could be obtained through remote technology;
- evaluated whether sufficient audit evidence could be obtained to corroborate significant management estimates such as assets and the pension fund liability valuations ;
- evaluated management's assumptions that underpin the revised financial forecasts and the impact on management's going concern assessment;
- discussed with management the implications for our audit report where we have been unable to obtain sufficient audit evidence; and
- engaged the use of auditor experts to assess investment property valuations due to the size of this balance and the risk associated with future income as a result of Covid-19.

Our audit work has not identified any issues in respect of the Covid-19 significant risk

The revenue cycle includes fraudulent transactions

Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Council and Group, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:

- there is little incentive to manipulate revenue recognition;
- opportunities to manipulate revenue recognition are very limited; and
- the culture and ethical frameworks of local authorities, including Cheltenham Borough Council, mean that all forms of fraud are seen as unacceptable.

Therefore we do not consider this to be a significant risk for the Council.

There have been no changes to our assessment as reported in our Audit Plan.

Significant audit risks

Risks identified in our Audit Plan Auditor commentary

Management override of controls

We have performed the following work in relation to this risk:

- evaluated the design effectiveness of management controls over journals;
- analysed the journals listing and determined the criteria for selecting high risk unusual journals;
- tested unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration;
- gained an understanding of the accounting estimates and critical judgements applied made by management and considered their reasonableness with regard to corroborative evidence; and
- evaluated the rationale for any changes in accounting policies, estimates or significant unusual transactions.

Our audit work has not identified any issues in respect of management override of controls.

Valuation of land and buildings

We have performed the following work in relation to this risk:

- evaluated management's processes and assumptions for the calculation of the estimate, the instructions issued to the valuation experts and the scope of their work;
- evaluated the competence, capabilities and objectivity of the valuation expert;
- written to the valuer to confirm the basis on which the valuations were carried out;
- challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding, the Council's valuer's report and the assumptions that underpin the valuation;
- tested, on a sample basis, revaluations made during the year to ensure they have been input correctly into the Council's asset register; and
- as a result of the Covid-19 pandemic, management's expert reported the valuations on the basis of material valuation uncertainty. We reviewed the valuations in line with market trends, and challenged any valuations that were not in line with trends.

Our testing identified that investment properties worth £1.9m and surplus assets worth £3.75m were not formally valued in 2019-20. The Council has undertaken an exercise which demonstrates their consideration that the current value and fair value of these assets at 31 March 2020 are not materially different. We have reviewed these judgments and are satisfied that they are appropriate. We have raised a recommendation at Appendix A for the Council to formally revalue all their surplus assets and investment properties on an annual basis.

The Council has material investment properties worth £68m included within its Balance Sheet. Given the impact of Covid-19 on commercial investments, we have engaged an auditor's expert to review the valuations of investment properties. The auditor's expert highlighted some areas for follow up, which we reviewed as part of our testing. No issues were identified as part of this review.

Management's expert has disclosed a material uncertainty with regards to the valuations of land, buildings, dwellings, investment properties and surplus assets and we have undertaken additional work as a result of this, as set out above. This will result in the audit report including an emphasis of matter, highlighting this material uncertainty.

Our audit work in this area is still ongoing as we review the responses to outstanding queries in relation to valuations.

Significant audit risks

Risks identified in our Audit Plan

Auditor commentary

Valuation of the pension fund net liability

We have performed the following work in relation to this risk:

- updated our understanding of the processes and controls put in place by management to ensure that the Council's pension fund net liability is not materially misstated and evaluate the design of the associated controls;
- evaluated the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work;
- assessed the competence, capabilities and objectivity of the actuary who carried out the Council's pension fund valuation;
- assessed the accuracy and completeness of the information provided by the Council to the actuary to estimate the liability;
- tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary; and
- undertaken procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report

Gloucestershire Pension Fund has disclosed a material uncertainty with regards to the valuations of property funds included within the pension fund assets. A corresponding material uncertainty has been disclosed in the Council's financial statements as its share of these property funds is material.

In 2018-19, the Council commissioned a revised IAS19 report to evaluate the impact of the McCloud judgment. The impact in 2018-19 was £458k which was not material, hence remained unadjusted. The Council has accounted for this in 2019-20 as a past service cost, which is appropriate. As the actuary prepared a revised report in 2018-19 and used this as the basis for the 2019-20 calculations, there is a £458k variance between the opening balances used by the actuary and the Council. The closing balances as at 31 March 2020 reconcile exactly, hence this is a presentation difference, which is considered appropriate.

We are awaiting assurances from the auditor of Gloucestershire Pension Fund as to the controls surrounding the validity and accuracy of membership data; contributions data and benefits data sent to the actuary by the pension fund; and the fund assets valuation in the pension fund financial statements.

Our audit work in this area is complete subject to the receipt and review of the Pension Fund Auditor's assurances.

Other audit risks

Risks identified in our Audit Plan

IFRS 16 implementation has been delayed by one year

Although the implementation of IFRS 16 has been delayed to 1 April 2021, audited bodies still need to include disclosure in their 2019/2020 statements to comply with the requirement of IAS 8 para 31. As a minimum, we would expect audited bodies to disclose the title of the standard, the date of initial application and the nature of the changes in accounting policy for leases.

Auditor commentary



The Council's financial statements identify that IFRS 16 is not anticipated to have a material effect on the financial statements or balances of the council since the changes mainly affect the recognition of leases by lessees and the Council does not have any material finance or operating lease liabilities as lessee.

We have reviewed the Council's assessment and undertaken audit procedures to gain assurance over the accuracy of this disclosure. We are satisfied that this disclosure is appropriate.





Significant findings arising from the group audit

Component	Component auditor	Findings	Group audit impact
Cheltenham Borough Homes Ltd.	Bishop Fleming LLP	<ul style="list-style-type: none"> The audit opinion of Cheltenham Borough Homes was issued by Bishop Fleming LLP on 19 October 2020. At the date of this report, one adjustment to the group position of £1.227m was identified, which is reported in Appendix C. We have performed audit procedures over the consolidation adjustments within the Group accounts. No issues have been identified as a result of our audit procedures. 	Auditor view Our audit work has not identified any issues in respect of the specified procedures performed, but is subject to final review procedures.
Gloucestershire Airport Ltd.	Hazlewoods LLP	<ul style="list-style-type: none"> The audit opinion of Gloucestershire Airport Ltd has not yet been issued. Our audit work in this area is currently outstanding subject to the receipt of the audit opinion from Hazlewoods LLP. We understand that the auditors have requested management to prepare financial modelling forecasts and sensitivity analysis over the airports operations as a result of the Covid-19 pandemic and any impact this may have on the companies going concern assessment. 	Auditor view Our audit work in this area is currently outstanding subject to the receipt and review of the final signed financial statements and audit opinion.
Publica Group (Support) Ltd	N/A - Analytical review performed by Grant Thornton UK LLP	<ul style="list-style-type: none"> We have completed analytical procedures over the draft accounts of Publica Group (Support) Ltd. No issues have been identified. 	Auditor view Our audit work has not identified any issues in respect of the specified procedures performed.
Ubico Ltd	N/A - Analytical review performed by Grant Thornton UK LLP	<ul style="list-style-type: none"> We are currently awaiting the draft accounts of Ubico Ltd in order to complete the analytical procedures 	Auditor view Our audit work in this area is currently outstanding subject to the receipt and review of the draft financial statements

Significant findings – key estimates and judgements

Accounting area	Summary of management's policy	Auditor commentary	Assessment
Provisions for NNDR appeals - £1.48m	The Council are responsible for repaying a proportion of successful rateable value appeals. Cheltenham Borough Council's calculation is based upon the latest information about outstanding rates appeals provided by the Valuation Office Agency (VOA) and previous success rates. A provision of £1.48m has been estimated for Cheltenham Borough Council for 2019/20 (£1.628m in 2018/19)	<ul style="list-style-type: none"> From our review of the Provision for NNDR appeals, no issues were identified in regard to the valuation basis The Council have estimated that if the assumed success rate of appeals were to increase by 1%, then the Council's share of its appeals provision would increase by £70k. Additionally, the Council have estimated that a 1% increase in the estimated rateable vale would result in an additional provision of £534k Overall we consider management's process and key assumptions to be reasonable. The estimate is adequately disclosed in the financial statements. 	 Green
Land and Buildings – Council Housing - £213.28m	The Council owns £213.28m of dwellings and is required to revalue these properties in accordance with DCLG's Stock Valuation for Resource Accounting guidance. The guidance requires the use of beacon methodology, in which a detailed valuation of representative property types is then applied to similar properties. HRA dwellings are revalued every five years. In interim years the dwelling valuation is updated by reference to Existing Use Value for Social Housing. The Council has engaged Bruton Knowles to complete the valuation of these properties in 2019-20. The year end valuation of Council Housing was £213.28m, a net increase of £3.4m from 2018/19 (£209.87m).	<ul style="list-style-type: none"> From our review of management's processes and assumptions for the calculation of the estimate, no issues were identified in regard to the valuation basis. We evaluated the assumptions made by management in undertaking the valuation of Council dwellings by using comparable indices, and raised follow up queries where variances above our tolerable threshold were identified. These were appropriately addressed Whilst management's expert has not included a material uncertainty in relation to Council dwellings, we recommended to management that Council Dwellings are reported on the basis of material valuation uncertainty due to Covid-19, and a corresponding amendment has been made. Overall we consider management's process and key assumptions to be reasonable. The estimate is adequately disclosed in the financial statements. 	 Green

Assessment





-  We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
-  We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
-  We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
-  We consider management's process is appropriate and key assumptions are neither optimistic or cautious

Significant findings – key estimates and judgements

Accounting area	Summary of management's policy	Auditor commentary	Assessment
Land and Buildings – Other - £135.15m	<p>Other land and buildings comprises £135.15m of assets. The council formally re-values its land and buildings on a rolling programme to ensure they are revalued at least every five years, however in accordance with the Code all land and building values are reviewed annually for material changes and re-valued at 31st March if necessary. Valuations have been carried out both internally by the council's property section and externally. Valuations of land and buildings were carried out using the methodologies and bases of estimation set out in the professional standards of the Royal Institution of Chartered Surveyors. The Council holds a number of specialised assets which are required to be valued at depreciated replacement cost (DRC) at year end, reflecting the cost of a modern equivalent asset necessary to deliver the same service provision. The remainder of other land and buildings are not specialised in nature and are required to be valued at existing use in value (EUV) at year end.</p> <p>In line with RICS guidance, the Council's valuer disclosed a material uncertainty in the valuation of the Council's land and buildings at 31 March 2020 as a result of Covid-19. The Council has included disclosures on this issue in Note 4.</p> <p>19.3% of Other Land and Buildings were revalued during 2019/20. Management have considered the year end value of non-valued properties, and the potential valuation change in the assets revalued by using knowledge of changes to build costs, obsolescence and condition of the property to determine whether there has been a material change in the total value of these properties. Management's assessment of assets not revalued has identified no material change to the property values. The total year end valuation of Other land and buildings was £135.15m, a net increase of £1.95m from 2018/19 (£133.2m).</p>	<ul style="list-style-type: none"> From our review of management's processes and assumptions for the calculation of the estimate, no issues were identified in regard to the valuation basis. We evaluated the assumptions made by management in undertaking the valuation of Land and Buildings by using comparable indices, and raised follow up queries where variances above our tolerable threshold were identified. These were appropriately addressed. Management's expert has reported a material uncertainty in relation to the valuation of land and buildings due to Covid-19, and the Council has included appropriate disclosures to reflect this in the statement of accounts. Overall we consider management's process and key assumptions to be reasonable. The estimate is adequately disclosed in the financial statements. 	

 **Greener** Page 45

Assessment

-  We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
-  We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
-  We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
-  We consider management's process is appropriate and key assumptions are neither optimistic or cautious

Significant findings – key estimates and judgements

Accounting area	Summary of management's policy	Auditor commentary	Assessment																								
Net pension liability – £51.31m	<p>The Council's net pension liability at 31 March 2020 is £51.31 m (PY £58.23m) comprising the Local Government Pension Scheme. The Council uses the actuary firm Hymans Robertson to provide actuarial valuations of the Council's assets and liabilities derived from these schemes. A full actuarial valuation is required every three years.</p> <p>Gloucestershire Pension Fund have disclosed a material uncertainty in relation to their property funds in their financial statements. The Council has included disclosures on this issue in Note 4.</p> <p>The latest full actuarial valuation was completed in 2019. A roll forward approach is used in intervening periods which utilises key assumptions such as life expectancy, discount rates, salary growth and investment return. Given the significant value of the net pension fund liability, small changes in assumptions can result in significant valuation movements. There has been a remeasurement of the net defined benefit liability of £10.25m during 2019/20.</p>	<ul style="list-style-type: none"> From our review of management's processes and assumptions for the calculation of the estimate, no issues were identified in regard to the valuation basis. Overall we consider management's process and key assumptions to be reasonable. The estimate is adequately disclosed in the financial statements. We have undertaken procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report. Gloucestershire Pension Fund have disclosed a material uncertainty in relation to their property funds in their financial statements. As the Council's share of the property assets is material, we recommended that the Council include a corresponding material uncertainty within their financial statements. The Council has included disclosures on this issue in Note 4. 	<table border="1"> <thead> <tr> <th>Assumption</th><th>Actuary Value</th><th>PwC range</th><th>Assessment</th></tr> </thead> <tbody> <tr> <td>Discount rate</td><td>2.3%</td><td>2.3%</td><td>● Green</td></tr> <tr> <td>Pension increase rate</td><td>1.9%</td><td>1.8% to 2%</td><td>● Green</td></tr> <tr> <td>Salary growth</td><td>2.8%</td><td>2.7% to 2.9%</td><td>● Green</td></tr> <tr> <td>Life expectancy – Males currently aged 45 / 65</td><td>22.4 / 21.7</td><td>21.6 to 23.3 / 20.5 to 22.2</td><td>● Green</td></tr> <tr> <td>Life expectancy – Females currently aged 45 / 65</td><td>25.3 / 23.9</td><td>24.6 to 26.3 / 22.9 to 24.3</td><td>● Green</td></tr> </tbody> </table> <p>Our audit work in this area is complete subject to the receipt and review of the Pension Fund Auditor's assurances.</p>	Assumption	Actuary Value	PwC range	Assessment	Discount rate	2.3%	2.3%	● Green	Pension increase rate	1.9%	1.8% to 2%	● Green	Salary growth	2.8%	2.7% to 2.9%	● Green	Life expectancy – Males currently aged 45 / 65	22.4 / 21.7	21.6 to 23.3 / 20.5 to 22.2	● Green	Life expectancy – Females currently aged 45 / 65	25.3 / 23.9	24.6 to 26.3 / 22.9 to 24.3	● Green
Assumption	Actuary Value	PwC range	Assessment																								
Discount rate	2.3%	2.3%	● Green																								
Pension increase rate	1.9%	1.8% to 2%	● Green																								
Salary growth	2.8%	2.7% to 2.9%	● Green																								
Life expectancy – Males currently aged 45 / 65	22.4 / 21.7	21.6 to 23.3 / 20.5 to 22.2	● Green																								
Life expectancy – Females currently aged 45 / 65	25.3 / 23.9	24.6 to 26.3 / 22.9 to 24.3	● Green																								

Assessment

- We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
- We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- We consider management's process is appropriate and key assumptions are neither optimistic or cautious

Significant findings – key estimates and judgements

Accounting area	Summary of management's policy	Auditor commentary	Assessment
Level 2/3 investments	<p>The Council have an investment in Gloucestershire Airport Ltd that is valued on the balance sheet as at 31 March 2020 at £1.7m. The Council also have £68.07m of investment properties and £42.2m of surplus assets held on their Balance Sheet.</p> <p>Management have disclosed a material uncertainty in relation to both investments due to the impact of Covid-19. Further detail is provided in Note 4.</p> <p>The investment in the Airport is not traded on an open exchange/market and the valuation of the investment is subjective. In order to determine the value, management have used a management's expert (Arlingclose) to calculate the fair value measurement of the investment. The value of the investment has stayed the same as the previous year.</p> <p>Management have used Bruton Knowles to undertake the valuation of their portfolio of investment properties. The valuer has disclosed the valuations on the basis of material valuation uncertainty. The total year end valuation of Investment Properties was £68.07m, a net decrease of £7.92m from 2018/19 (£75.99m).</p> <p>Management have used internal valuers to undertake the valuation of their portfolio of surplus assets. The valuer has disclosed the valuations on the basis of material valuation uncertainty. The total year end valuation of Surplus Assets was £42.2m, a net increase of £37m from 2018/19 (£5.2m). The large increase is due to additions purchased in 2019/20</p>	<ul style="list-style-type: none"> From our review of management's processes and assumptions for the calculation of the estimate, no issues were identified in regard to the valuation basis. We challenged the valuation of the investment in Gloucestershire Airport Ltd due to the impact of Covid-19, and obtained relevant information to support the valuation. As the valuation is only greater than our materiality by £200k, the risk of material misstatement is low. We evaluated the assumptions made by management in undertaking the valuation of investment properties by using comparable indices, and raised follow up queries where variances above our tolerable threshold were identified. These were appropriately addressed. Management's expert has reported a material uncertainty in relation to the valuation of investment properties and surplus assets due to Covid-19, and the Council has included appropriate disclosures to reflect this in the statement of accounts. We identified that investment properties worth £1.9m and surplus assets worth £3.75m were not formally valued in 2019-20. The Council has undertaken an exercise which demonstrates their consideration that the current value and fair value of these assets at 31 March 2020 are not materially different. We have reviewed these judgments and are satisfied that they are appropriate. We have raised a recommendation at Appendix A for the Council to formally revalue all their surplus assets and investment properties on an annual basis. Overall we consider management's process and key assumptions to be reasonable. The estimate is adequately disclosed in the financial statements. 	

Page 47
Greener

Assessment

- We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
- We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- We consider management's process and key assumptions to be reasonable

Significant findings – going concern

Our responsibility

As auditors, we are required to “obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern” (ISA (UK) 570).

Going concern commentary

Management's assessment process

- Management have prepared a paper which contains a review of the financial position as at 31 March 2020 alongside an assessment of the ability of the Council to continue operating for the foreseeable future.
- Management have also prepared a cash flow forecast from April 2020 to November 2021, which shows that the cashflows over this period are sustainable.
- Management have considered the impact of Covid-19 on the Council's ability to continue as a going concern, and have factored this into their medium term financial planning.
- In making their assessment, management have considered the Council's reserves, liquidity, capital expenditure as well as assumptions about income and expenditure over the next few years.
- Management have commissioned a piece of work to consider the impact of Gloucestershire Airport Ltd.'s going concern on the Council.

Auditor commentary

- Management's assessment of the use of the going concern basis of accounting is appropriate
- The cashflow projections and medium term financial planning projections are based on prudent assumptions about future income
- The disclosures in the accounts are considered appropriate
- We will review the work commissioned by the Council in arriving at a conclusion regarding the impact of Gloucestershire Airport's going concern assessment on the Council.

Work performed

- We have reviewed management's assessment and cashflow projections in arriving at the conclusion that the Council is a going concern, and reviewed the disclosures in the narrative report and financial statements.
- We have also reviewed the Medium Term Financial Plan to 2023/24, and the 2020-21 Budget and are satisfied that the Going Concern basis is appropriate for the 2019-20 financial statements

- We have not identified a material uncertainty in relation to management's assessment of the use of the going concern basis of accounting
- We consider this to be appropriate

Concluding comments

Overall we are satisfied with management adopting the going concern basis of accounting, however we will review the report commissioned by the Council in relation to the impact of Gloucestershire Airport Ltd.'s going concern in reaching our final conclusion.

Other matters for communication

We set out below details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

Issue	Auditor commentary
Matters in relation to fraud	We have previously discussed the risk of fraud with the Audit, Compliance and Governance Committee. We have not been made aware of any other incidents in the period and no other issues have been identified during the course of our audit procedures
Matters in relation to related parties	We are not aware of any related parties or related party transactions which have not been disclosed
Matters in relation to laws and regulations	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
Written representations	A letter of representation has been requested from the Council, which is included in the Audit, Compliance and Governance Committee paper
Confirmation requests from third parties	<ul style="list-style-type: none"> We requested from management permission to send confirmation requests for the Council's bank and investment balances. This permission was granted and the requests were sent. All of these requests were returned with positive confirmation. We requested permission from management to send confirmation requests to the pension fund auditor. This permission was granted and the requests were sent. We have not yet received the final response from the pension fund auditor but are liaising regularly with them whilst they complete their work. We will require this assurance prior to issuing our opinion. We requested permission from management to send requests to the Council's valuers. This permission was granted and the requests were sent. We received responses from all valuers involved and we have completed our audit procedures in relation to these requests.
Disclosures	Our review identified a number of disclosure changes within the draft financial statements which were subsequently amended. See page 28 for further details.
Audit evidence and explanations/significant difficulties	The completed draft financial statements were received on the 31 July 2020. Additionally, the majority of working papers requested were received by early August. We encountered some delays in receiving appropriate evidence to support some sample testing undertaken, however after additional discussions with the finance team, this was resolved and we were able to complete our testing. The quality of working papers received require improvement, and a recommendation has been raised in respect of this in Appendix A.

Other responsibilities under the Code

Issue	Commentary
Other information	<p>We are required to give an opinion on whether the other information published together with the audited financial statements (including the Annual Governance Statement and Narrative Report), is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.</p> <p>Some minor disclosure amendments were identified which have been amended. No inconsistencies have been identified, and we plan to issue an unmodified report in this respect.</p>
Matters on which we report by exception	<p>We are required to report on a number of matters by exception in a numbers of areas:</p> <ul style="list-style-type: none"> • If the Annual Governance Statement does not meet the disclosure requirements set out in the CIPFA/SOLACE guidance or is misleading or inconsistent with the other information of which we are aware from our audit; and • If we have applied any of our statutory powers or duties <p>We have nothing to report on these matters.</p>
Specified procedures for Whole of Government Accounts	<p>We are required to carry out specified procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions. However, this work is not required at Cheltenham Borough Council as the Council does not exceed the threshold of £500m for assets (excluding PPE); liabilities (excluding Pension); income or expenditure.</p>
Certification of the closure of the audit	<p>The Group Instructions for the Whole of Government Accounts have not been released at the time of writing this report. We will be unable to certify the completion of the audit until we fulfil our responsibilities as set out in the Group Instruction.</p>

Value for Money

Background to our VFM approach

We are required to satisfy ourselves that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. This is known as the Value for Money (VFM) conclusion.

We are required to carry out sufficient work to satisfy ourselves that proper arrangements are in place at the Council. In carrying out this work, we are required to follow the NAO's Auditor Guidance Note 3 (AGN 03) issued in April 2020. AGN 03 identifies one single criterion for auditors to evaluate:

"In all significant respects, the audited body takes properly informed decisions and deploys resources to achieve planned and sustainable outcomes for taxpayers and local people."

This is supported by three sub-criteria, as set out below:

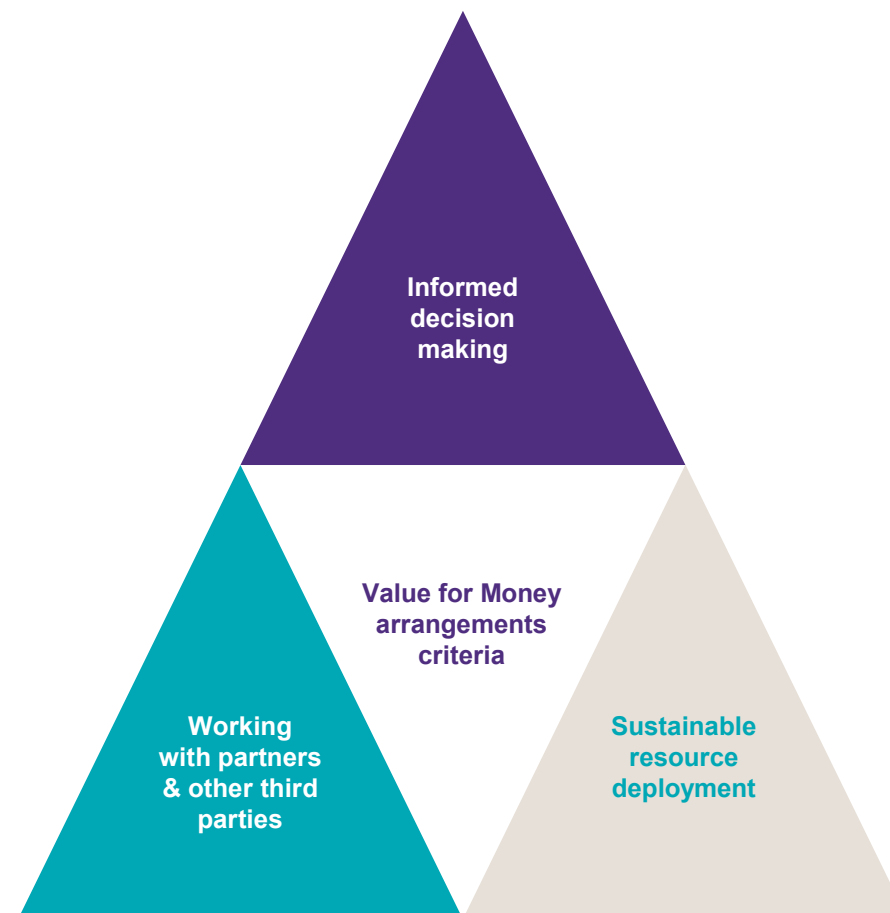
Risk assessment

We carried out an initial risk assessment in February 2020 and identified one significant risk in respect of specific areas of proper arrangements using the guidance contained in AGN03. We communicated these risks to you in our Audit Plan dated March 2020

We have continued our review of relevant documents up to the date of giving our report, and have not identified any further significant risks where we need to perform further work.

We have not identified any new VfM risks in relation to Covid-19. We do not consider Covid-19 to be a significant risk given the date of the pandemic. We have, however reviewed the medium term financial plan produced by the Council, taking into account the impacts of Covid-19 on scenario planning, and the impact of Covid-19 on the Council's investment income.

We carried out further work only in respect of the significant risks we identified from our initial and ongoing risk assessment. Where our consideration of the significant risks determined that arrangements were not operating effectively, we have used the examples of proper arrangements from AGN 03 to explain the gaps in proper arrangements that we have reported in our VFM conclusion.



Value for Money

Our work

AGN 03 requires us to disclose our views on significant qualitative aspects of the Council's arrangements for delivering economy, efficiency and effectiveness.

We have focused our work on the significant risks that we identified in the Council's arrangements. In arriving at our conclusion, our main considerations were:

- Medium Term Financial Planning and the need to identify further savings in the medium term to balance the budget; and
- Future plans to bridge the budget gap, considering the impact of Covid-19 on medium term finances.

We have set out more detail on the risks we identified, the results of the work we performed, and the conclusions we drew from this work on pages 22 and 23

Overall conclusion

Based on the work we performed to address the significant risks, we are satisfied that the Council had proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

Recommendations for improvement

We discussed findings arising from our work with management and have agreed recommendations for improvement.

Our recommendations and management's response to these can be found in the Action Plan at Appendix A

Significant difficulties in undertaking our work

We did not identify any significant difficulties in undertaking our work on your arrangements which we wish to draw to your attention.

Significant matters discussed with management

There were no matters where no other evidence was available or matters of such significance to our conclusion or that we required written representation from management or those charged with governance.

Value for Money

Key findings

We set out below our key findings against the significant risks we identified through our initial risk assessment and further risks identified through our ongoing review of documents.

Significant risk

Findings

Medium Term Financial Strategy

We reported in our audit plan in March 2020 that the Council have been required to deliver substantial savings since 2010/11, and forecast continued significant savings requirements going forward. The current MTFS indicates that the Council reflect a funding gap for the period 2021/22 to 2023/24 of £2.616m. It also indicates that the Council proposes to fund a gap of £1.084m with £0.826m of savings plans and additional income, with the residual gap to be funded from the Budget Strategy (Support) Reserve during 2020/21, and also includes a number of unidentified savings over the period to 2023/24.

- Our detailed review of the assumptions underpinning the MTFS concludes that they are satisfactory and reasonable.
- The Council has a strong track record of delivering balanced budgets and identifying required savings. The 2019/20 outturn was a deficit of £48k against the profiled budget which represents a negative variance of 0.3% against the net budget. The budget monitoring report to the end of December 2019 projected the expected delivery of services within budget. The recorded additional expenditure in respect of COVID-19 in 2019/20 was £72,798. The total amount received from Central Government in 2019/20 was £50,043. The non-collection fund losses from income were circa £400k, with the largest contributor to that figure being lost income from car parking which has been met via a contribution from the car parking equalisation earmarked reserve. Despite this, the overspend on the general fund was £48k, which is largely due to a number of reported savings which were the result of delays or slippage in carrying out particular tasks which are still necessary and will need to be completed in the 2020/21 financial year. The 2019-20 Capital Outturn shows a significant underspend of £4.6m, which is caused in large part due to timing delays on capital projects which will be carried forward into 2020-21.
- Savings are monitored by Finance on a monthly basis. Savings are built into base budgets, and are therefore monitored through the variances reported in quarterly revenue budget monitoring. Any new capital scheme or projects with a financial implication have to be subject to a business case. Financial services will be involved in this process and have to sign off the financial business case, including the impact on the MTFS. Cabinet Members are involved on the project board, which is set up for all major schemes and are fully briefed and included in the project process, prior to a committee report being submitted for approval. This process is well established and has not significantly changed for a number of years. The savings for 2020/21 have been identified and can be attributed to specific plans, such as the Modernisation programme and Car Parking Strategy. The savings plans of £826k are after £258k reliance on reserves.
- Due to the impact of Covid-19, £250k of the £350k amber rated savings included in the 2020-21 savings strategy have not been achieved. The s151 Officer plans to take a Covid-19 Revised Budget to Full Council in November 2020 setting out changes to the 2020-21 budget. This includes a change to the minimum revenue provision policy (MRP), which involves the use of capital receipts to pay off borrowing, thereby reducing the capital financing requirement, and correspondingly, the MRP. The savings attributable to this scheme in 2020-21 are £1.657m. The s151 officer has also created a policy around the use of capital flexibility, which will impact the 2021-22 savings plan and budget.
- The Budget Strategy (Support) Reserve is part of the Council's medium term strategy and was set up in 2015 specifically for the purpose of supporting the budget. The use of this reserve has been appropriately considered by the Section 151 Officer and approved by Cabinet and Council. We have considered the use of reserves in 2019/20 to deliver financial balance. The Council plan to use £258k of the Budget Strategy (Support) Reserve in 2020/21. The level of reserves is sufficient to support the budget for 2020/21 but beyond this it will have to be replenished.

Value for Money

Significant risk *continued*

Findings *continued*

Medium Term Financial Strategy

We reported in our audit plan in March 2020 that the Council have been required to deliver substantial savings since 2010/11, and forecast continued significant savings requirements going forward. The current MTFS indicates that the Council reflect a funding gap for the period 2021/22 to 2023/24 of £2.616m. It also indicates that the Council proposes to fund a gap of £1.084m with £0.826m of savings plans and additional income, with the residual gap to be funded from the Budget Strategy (Support) Reserve during 2020/21, and also includes a number of unidentified savings over the period to 2023/24.

- We therefore note this as a recommendation within this Audit Findings Report as the reserve will require replenishment by 2021/22 under current plans. We recommend that management continue to monitor the use of reserves when budget setting to ensure that into the medium term dependency on reserves is reduced.
- The Council formally adopted a Commercial Strategy in February 2018. The strategy identified that part of the Council's drive towards financial sustainability would now include identifying new opportunities to generate income and investment in projects which provide good financial returns. As communicated in our Audit Plan in March 2020, we have considered whether the commercial investments entered into are in line with the strategy. Furthermore, as a result of Covid-19, we have also considered the feasibility of reliance upon investment income in the medium term.
- The Council has an Estates Team responsible for monitoring each of the investment properties owned by the Council. The s151 Officer, and Cabinet Finance Member have monthly meetings with the Estates team in order to get an update on the properties, any new tenants, and any issues with existing tenants. These are then taken forward as appropriate. The s151 Officer also receives monthly aged debt reports, where any non-payment of rents would be identified. We are satisfied that the governance arrangements around investment properties are appropriate, and in line with the commercial strategy.
- Of the Council's existing investment properties, none have been particularly adversely impacted by Covid-19. The largest occupier is Sainsbury's. Other offices and shops have not defaulted on their rental agreements, and the majority are locked into agreements until 20 and beyond, with rent reviews due on properties within the next year.
- Overall, the income to the end of March 2021 is secure, however there are some tenancies expiring during the 2021-22 financial year, which may not be renewed if home working becomes more common. The Council will have to continue to closely monitor their investment opportunities to identify additional savings in this case. We have raised a recommendation in Appendix A for the Council to consider this alongside the recommendation around use of reserves in the medium term.

We concluded that the risk was sufficiently mitigated and the Council has proper arrangements for planning finances effectively to support the sustainable delivery of strategic priorities.

We have made two recommendations in relation to the Council's use of reserves and reliance on investment income at Appendix A.

Independence and ethics

Auditor independence

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant facts and matters that may bear upon the integrity, objectivity and independence of the firm or covered persons relating to our independence. We encourage you to contact us to discuss these or any other independence issues with us. We will also discuss with you if we make additional significant judgements surrounding independence matters.

In this context, we disclose the following to you that a member of our wider public sector assurance team took up a post within Publica Group (Support) Ltd in May 2020 as Deputy Chief Financial Officer to Cotswold District Council, with further responsibilities as Chief Accountant in Publica Group (Support) Ltd. This individual did not work on this audit engagement so we consider that this fact has had no bearing on our audit judgement or independence. We have safeguarded the perceived threat to independence by ensuring the member of staff was not involved with the audit, with assurance received from the Chief Financial Officer (Section 151 Officer) that once working at Publica, the individual will not:

- have access to view or amend the Cheltenham Borough Council general ledger
- instruct staff on any transactions which affect the Cheltenham Borough Council accounts.
- prepare or have any input into the Financial Statements for Cheltenham Borough Council
- have line management responsibility for any members of staff who are based in Cheltenham

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Councils Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in December 2017 and PSAA's Terms of Appointment which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Details of fees charged are detailed in Appendix D

Independence and ethics



Audit and Non-audit services

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Council. The following non-audit services were identified, as well as the threats to our independence and safeguards that have been applied to mitigate these threats.

	Fees £	Threats identified	Safeguards
Audit related			
Certification of Housing Capital receipts grant	£3,500	Self-Interest (because this is a recurring fee)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is £3,500 in comparison to the total fee for the audit of £49,543 and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.
		Self review (because GT provides audit services)	To mitigate against the self review threat , the timing of certification work is done after the audit has completed materiality of the amounts involved to our opinion and unlikelihood of material errors arising and the Council has informed management who will decide whether to amend returns for our findings and agree the accuracy of our reports on grants.
Certification of Housing Benefit Claim	19,906	Self-Interest (because this is a recurring fee)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is £19,906 in comparison to the total fee for the audit of £49,543 and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.
		Self review (because GT provides audit services)	To mitigate against the self review threat , the timing of certification work is done after the audit has completed materiality of the amounts involved to our opinion and unlikelihood of material errors arising and the Council has informed management who will decide whether to amend returns for our findings and agree the accuracy of our reports on grants.

Action plan

We have identified 4 recommendations for the group as a result of issues identified during the course of our audit. We have agreed our recommendations with management and we will report on progress on these recommendations during the course of the 2020/21 audit. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.




Assessment	Issue and risk	Recommendations
 Medium	<p>The Budget Strategy (Support) Reserve is part of the Council's medium term strategy and was set up in 2015 specifically for the purpose of supporting the budget. The use of this reserve has been appropriately considered by the Section 151 Officer and approved by Cabinet and Council. We have considered the use of reserves in 2019/20 to deliver financial balance. The Council plan to use £258k of the Budget Strategy (Support) Reserve in 2020/21. The level of reserves is sufficient to support the budget for 2020/21 but beyond this it will have to be replenished.</p>	<p>We raise this as a recommendation as the reserve will require replenishment by 2020/21 under current plans. We recommend that management continue to monitor the use of reserves when budget setting to ensure that medium term dependency on reserves is reduced.</p> <p>Management response</p> <p>The requirement for financial reserves is acknowledged in statute. Sections 32 and 43 of the Local Government Finance Act 1992 require billing authorities in England and Wales to have regard to the level of reserves needed for meeting estimated future expenditure when calculating the budget requirement. The Covid-19 Revised Budget 2020/21 which will be presented to Full Council on 16th November 2020, recommends a number of measures that will enable the Council to increase its reserves over the coming years. Management will continue to monitor the level of reserves and will report those findings, with appropriate recommendations, to Council at least twice a year.</p>
 Medium	<p>The Council's net budget includes income from investment properties. Income from investment properties to the end of March 2021 is secure, however there are some tenancies expiring during the 2021-22 financial year which may not be renewed if home working becomes more common. The Council will have to continue to closely monitor their investment opportunities to identify additional savings in this case.</p>	<p>We raise this as a recommendation as the Covid-19 pandemic has changed ways of working, and this may impact on future income levels from investment properties if leases are not renewed.</p> <p>Management response</p> <p>Agreed. Proactive marketing with potential tenants will continue ahead of any tenancy expiries, and be reported to the CFO and Cabinet Member on a monthly basis.</p>

Key

-  High
-  Medium
-  Low

Action plan

We have identified 4 recommendations for the group as a result of issues identified during the course of our audit. We have agreed our recommendations with management and we will report on progress on these recommendations during the course of the 2020/21 audit. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

Assessment	Issue and risk	Recommendations
 Medium	We identified that investment properties worth £1.9m and surplus assets worth £3.75m were not formally valued in 2019-20. The Council has undertaken an exercise which demonstrates their consideration that the carrying value and fair value of these assets at 31 March 2020 are not materially different.	<p>Whilst the Council's approach is in line with the CIPFA Code as they have demonstrated their consideration that the carrying value and fair value are not material different. We recommend that the Council formally revalue all their investment properties and surplus assets annually to reduce the risk of material misstatement</p> <p>Management response</p> <p>Agreed</p>
 Medium	Our testing identified sample evidence and working papers which were not to the required standard. Examples include the sample evidence in relation to income and expenditure and working papers in relation to property, plant and equipment reconciliations.	<p>We recommend that the Council make improvements to the quality of the working paper provided, and provide training to employees around audit evidence to be provided. As external audit, we are willing to provide guidance in this area if this will be useful.</p> <p>Management response</p> <p>The Council is in the process of directly employing a Head of Finance (Deputy S151 Officer) to lead on the production of annual accounts. They will be required to ensure the financial services team is adequately resourced and trained to comply with the requirements of the External Auditor. The S151 Officer will gratefully accept the offer to provide guidance in this area when the new Head of Finance is in post.</p>
 Low	The Council's componentisation policy has not been updated since 2011. This policy was based on 1% of Other Land and Buildings being £872k, however based on the latest balances, 1% would be £1.421m	<p>We recommend that the Council review and update this policy in 2020-21</p> <p>Management response</p> <p>Agreed</p>

Follow up of prior year recommendations

We identified the following issues in the audit of Cheltenham Borough Council's 2018/19 financial statements, which resulted in recommendations being reported in our 2018/19 Audit Findings report. We have followed up on the implementation of our recommendations and note that these have been appropriately resolved.

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue
✓	We recommend that management continue to monitor the use of reserves when budget setting to ensure that the medium-term dependency on reserves is reduced	This has been raised as a recommendation in the Action Plan at Appendix A, hence the prior year recommendation can be closed
✓	We recommend that the Council continue to develop clarity on respective roles and responsibilities and continue to strengthen the communication process with Publica Group (Support) Ltd	Based on management response provided in 2018-19 and review of arrangements as part of our VFM risk assessment, this recommendation is considered closed.
✓	The Council currently has a balanced budget to 2021/22, however the achievement of the balanced budget is dependent on a number of red-rated savings from 2019/20.	We are aware from our review of the medium term financial strategy that red rated savings are reviewed during budget setting. No red rating savings identified for 2020-21
✓	A formal lease is not in place between Ubico and Cheltenham Borough Council for arrangements to lease recycling and refuse vehicles from the Council to Ubico.	A formal lease between Ubico and Cheltenham Borough Council for arrangements to lease recycling and refuse vehicles from the Council to Ubico is now in place and was formally agreed during 2019/20. This has been requested and reviewed as part of the 2019/20 statement of accounts audit.

Assessment

- ✓ Action completed
- ✗ Not yet addressed

Appendix C

Audit adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

Impact of adjusted misstatements

All adjusted misstatements are set out in detail below along with the impact on the key statements and the reported net expenditure for the year ending 31 March 2020.

Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Impact on total net expenditure £'000
Misclassification noted between Revenue Grants Received in Advance and Creditors. Creditors overstated and Grants Received in Advance (GRIA) Understated.	£0	Dr Creditors - £2,660 Cr GRIA - £2,660	£0
The disabled facility grant was misclassified within Other Comprehensive Income but should have been classified within Net Cost of Services in the Place and Growth Directorate	Dr Taxation and Non-Specific Grant Income - £410k Cr Place and Growth income - £410k	£0	£0
Within the group financial statements, the Property, Plant and Equipment balance is overstated by £1,227k, with a corresponding understatement of Net Cost of Services – Local Authority Housing	Dr Local Authority Housing Expenditure - £1,227k	Cr Property, Plant and Equipment - £1,227k	£1, k
Overall impact	£1,227	(£1,227)	£1,227

Audit adjustments

Misclassification and disclosure changes The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

Disclosure omission	Detail	Auditor recommendations	Adjusted?
Audit fees	Audit fees did not include £4k fees for the use of an auditor's expert. Pooling of housing capital receipts were included as £2,150, correct fees are £3,500. CFO Insights fee was included even though subscription had lapsed and no payment had been made	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
Grants	There was a £410k reconciliation difference between Note 16 and Note 18 to the accounts due to the disabled facility grant error identified in audit adjustments.	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
Pensions	The table in Note 34 omitted payments in advance of £3,662k, and unfunded benefits of £98k	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
Leases	The operating lease for Regent's Arcade has been miscalculated with the rental value being calculated for 5 years as opposed to 4 years. Result is an overstatement of future minimum lease payments by £575k.	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
Material uncertainty	The Council had not included a material uncertainty in relation to the valuation of land and buildings, dwellings, investments measured at fair value, and pension fund property assets. We recommended that additional disclosures be included in relation to these material uncertainties arising as a result of Covid-19	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
Financial instruments	Income, expenses, gains and losses within the Financial Instruments note did not tie back to Note 9 – Financing and Investment Income and Expenditure	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
Related party transactions	A number of variances between the statement of accounts and transaction listings were noted in relation to the related parties disclosure. We recommend that the related parties note be updated accordingly	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓
General	There were a number of other minor presentational adjustments and improvements made to enhance the quality of the statement of accounts	Disclosure adjustment identified should be adjusted in the final version of the Statement of Accounts.	✓

Audit adjustments

Impact of prior year unadjusted misstatements

The table below provides details of adjustments identified during the prior year audit which had not been made within the final set of 2018/19 financial statements.

Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Impact on total net expenditure £'000	Reason for not adjusting
As reported in our prior period ISA 260 report, the impact of the McCloud Judgement was not amended in the Council's 2018-19 accounts, as management's view was this was not considered material. The Council has therefore included the unadjusted amounts from the prior period as non-material adjustments in the current period. These transactions mean that the following differences have been identified between the accounts and the 2019-20 actuary report. We are satisfied that management has followed the appropriate accounting treatment and complied with the CIPFA code in relation to this prior period misstatement.				
Past Service Cost	-458			
Return on plan assets	-594			
Present value of obligation		-458		
Fair value of plan Assets		-594		
	-1,052	-1,052	-1,052	This has been adjusted in the 2019-20 financial statements, as it was not material in 2018-19
Overall impact	-1,052	-1,052	-1,052	

Appendix D

Fees

We confirm below our final fees charged for the audit and provision of non-audit services.

Audit fees	Proposed fee	Final fee
Council Audit	£45,543	£49,543*
Total audit fees (excluding VAT)	£45,543	£49,543*

* The final fee for the year is subject to a final review and discussion with the s151 Officer to take account of the impact of Covid-19 and the additional time required to complete the audit.

The increase from the scale fee has been communicated to members of the Audit, Compliance and Governance Committee at the January Committee meeting. The Proposed Fee has been approved by PSAA. The additional £4,000 relates to the use of an auditor's expert to review the investment property valuations, as communicated at the Audit, Compliance and Governance Committee in July 2020. This is subject to PSAA approval.

The fees reconcile to the financial statements.

Non-audit fees for other services	Proposed fee	Final fee
Certification of Housing Capital receipts grant (Audit related)	£3,500	TBC
Certification of Housing Benefits Claim (Audit related)	£19,906	TBC
Total non- audit fees (excluding VAT)	£23,406	TBC



Cheltenham Borough Council
Audit, Compliance and Governance Committee - 11 November 2020
Statement of Accounts 2019/20
Report of the Section 151 Officer

Accountable member	Councillor Rowena Hay, Cabinet Member for Finance
Accountable officer	Paul Jones, Executive Director – Finance & Assets
Accountable scrutiny committee	Audit Committee
Ward(s) affected	All
Significant Decision	Yes
Executive summary	The purpose of this report is to present the audited Statement of Accounts 2019/20 for formal approval. Members of the Committee will recall that Council previously agreed that the consideration and sign off of the statement of accounts is delegated to the audit committee and that no report is made back to council unless there are issues arising from the audit.
Recommendations	<p>a) Audit Committee is requested to formally approve the accounts for the year ended 31st March 2020.</p> <p>b) The Chair of the Audit Committee is recommended to sign the Statement of Accounts and the letter of representation.</p>

Financial implications	<p>As included in the Statement of Accounts 2019/20.</p> <p>Contact officer: Andrew Knott, Andrew.knott@publicagroup.uk, 01242 264121</p>
Legal implications	<p><i>This report adopts relevant guidance issued in the Accounts and Audit Regulations 2003 and 2011.</i></p> <p>Contact officer:</p>
HR implications (including learning and organisational development)	<p><i>None arising directly from this report.</i></p> <p>Contact officer: Julie McCarthy , HR Manager, Publica Group Limited julie.mccarthy@publicagroup.uk, 01242 264355</p>
Key risks	There are no risks arising from this report which need to be brought to the attention of members.
Corporate and community plan Implications	None

Environmental and climate change implications	None.
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1. Introduction

- 1.1** The Accounts and Audit Regulations require the council to prepare an annual statement of accounts by 31st May of each year. The Section 151 Officer must sign and date the draft statement of accounts, and certify that they present a true and fair view of the financial position of the council. There should then be a period of public inspection of the accounts. Due to Covid-19, these regulations were changed and the date amended to the 31st of July 2020 for the 2019/20 financial year.
- 1.2** The Regulations then require that the draft accounts be audited and for the audited statement of accounts to be considered and approved by way of a council committee by 31st July, following the year end. The Section 151 Officer must re-certify the audited statement of accounts prior to this meeting. Following approval by the committee, the statement of accounts is to be signed and dated by the person presiding at the meeting. Council has delegated authority to the Audit Committee to review and approve the audited statement of accounts. Due to Covid-19, these regulations were changed and the date amended to the 30th of November 2020 for the 2019/20 financial year.
- 1.3** The Audit Committee review specifically considers whether appropriate accounting policies have been followed, the conclusion of the audit of the statements, and whether there are any issues that need to be brought to the attention of the Council. The Committee also considers whether the Annual Governance Statement fairly reflects the arrangements within the council and whether the suggested action plan will address any significant governance issues.
- 1.1** The 'Audit Findings' report from Grant Thornton to this meeting highlights any key changes to the original draft accounts presented for audit.

2. Background

- 2.1** The draft Statement of Accounts for 2019/20 was signed by the Section 151 Officer on 21st July 2020, with the work completed in accordance with the statutory deadline of 31st July 2020. The public inspection period operated from 3rd August 2020 to 11th September 2020 and a public notice to that effect was publicised on the Council's website.
- 2.2** From 2010/11 the Statement of Accounts has had to comply with a new code of accounting practice – the CIPFA Code of Practice on Local authority Accounting (the 'Code'), which fully incorporates International Financial Reporting Standards (IFRS).

3. Auditor's Report

- 3.1** The council's external auditors, Grant Thornton UK LLP, conducted a full audit of the financial statements and will issue a 'Report to those charged with governance (ISA 260) for 2019/20', which is anticipated to give the Statement of Accounts an unqualified audit opinion in relate to the Council's Statement of Accounts 2019/20.

4. Reasons for recommendations

- 4.1** The Council is required to formally approve its audited Statement of Accounts by 30th of November 2020. The Chairman of the Audit Committee is asked to approve the Statement on behalf of the Council.
- 4.2** A copy of the audited Statement of Accounts 2019/20 is attached at Appendix 1 to this report.

Once approved, the audited statements will be published on the Council's website and notice advertised of the completion of the audit.

5. Letter of representation

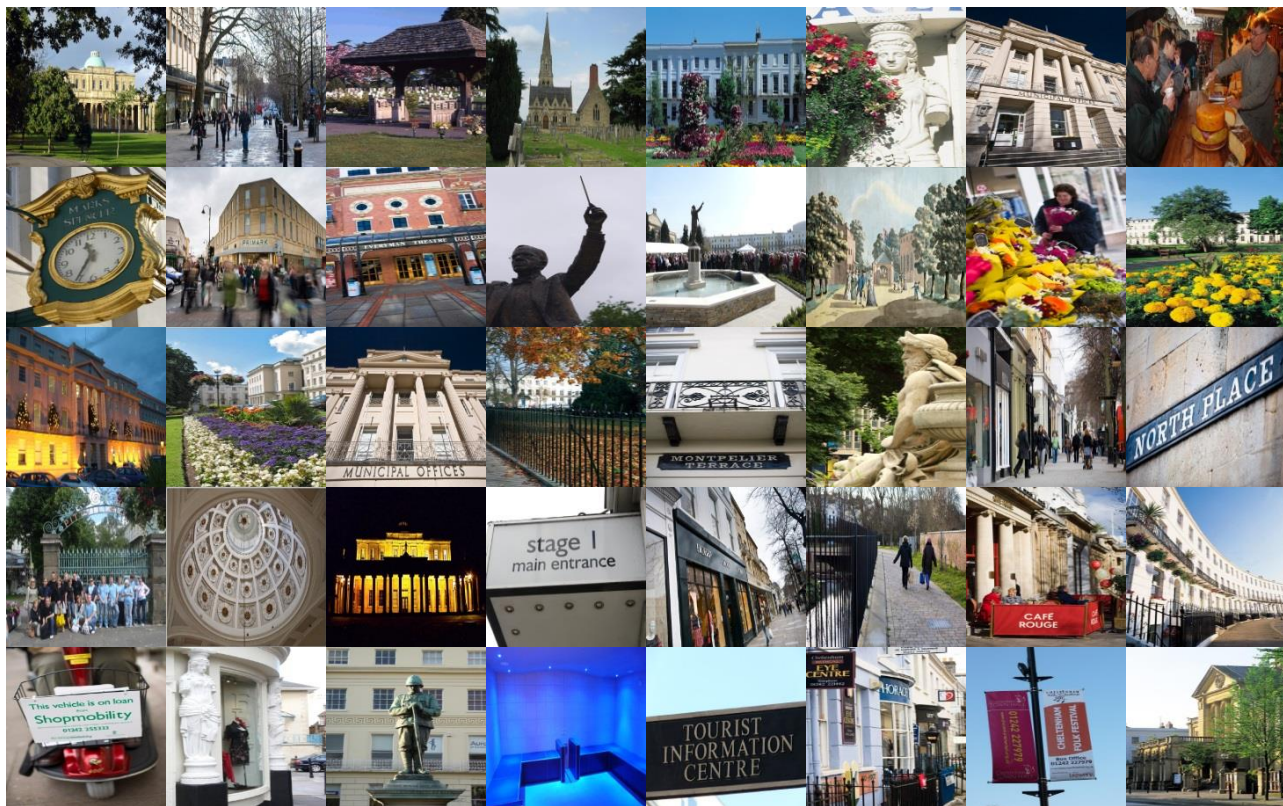
- 5.1** As part of the approval process for the Statement of Accounts, the Council is required to provide a Letter of Representation to the external auditor. This is to confirm or notify any material factors that could affect the auditor's view of the accounts since formal closure at 31st March 2020.
- 5.2** Note 31 outlines contingent liabilities; these are issues that currently exist but had not materialised by 31st March 2020. As Section 151 Officer I can confirm there has been no resolution to date of these matters, nor any other changes that I need to report to the external auditor
- 5.3** It is seen as best practice for both the Section 151 Officer and the Chair of the Audit Committee to sign the Letter of Representation. A copy of this letter is given at Appendix 2 to this report.

Report author	Contact officer: Andrew Knott Andrew.knott@publicagroup.uk, 01242 264121
Appendices	Appendix A – Statement of Accounts 2019/20 Appendix B – Letter of representation
Background information	<ol style="list-style-type: none">1. External Audit Working paper files 2019/202. Code of Practice on Local Authority Accounting in the UK 2019/20 Accounts3. Ledger records for 2019/20.

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CHELTENHAM BOROUGH COUNCIL

Statement of Accounts 2019/20



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NARRATIVE REPORT

INTRODUCTION TO CHELTENHAM BOROUGH COUNCIL

Cheltenham is one of Britain's finest spa towns, set in a sheltered position between the rolling Cotswold Hills and the Severn Vale. It has a population of 117,100 (2017 Office for National Statistics) and with its architectural heritage, educational facilities and quality environment, Cheltenham is an attractive place to live, work and play.

Cheltenham is home to a number of festivals that take place throughout the year which include the world-renowned Jazz, Music, Science and Literature Festivals. Cheltenham Racecourse hosts sixteen days of racing over 8 events every year including the Gold Cup Festival. The borough also plays host to the Everyman Theatre, the Playhouse Theatre and Cheltenham Town Hall, all of which offer a rich and varied programme of professional and amateur performing arts. It is also the home of The Wilson art gallery and museum, hosting a wide range of collections, exhibitions and cultural events.

Cheltenham Borough Council has an extensive property portfolio including a number of listed buildings that are operated by The Cheltenham Trust, namely the Town Hall, Pittville Pump Room and The Wilson art gallery and museum. The council acquired several new investment properties in 2018/19. These buildings are held for investment purposes, currently fully occupied by local businesses and are in addition to Delta Place, acquired for the same purpose in 2015/16. The council has secured a long term revenue stream from tenancy arrangements. In 2019/20 the council acquired Land in West Cheltenham in order to create a flagship Cyber Central new area of Cheltenham and help to fulfil the ambition to become the Cyber Capital of the UK. This land acquisition is the first step on the road to fulfilling this ambition.

The council also has an interest in the Regent Arcade shopping centre. These properties help provide the council with a funding stream to support its services provided to the public.

Political Structure in the 2019/20 municipal year

Local Councillors are elected by the community to decide how the council should carry out its various activities. They represent public interest as well as individuals living within the ward in which he or she has been elected to serve a term of office. They have regular contact with the general public through council meetings, telephone calls and some Councillors may hold surgeries. Surgeries provide an opportunity for any ward resident to go and talk to their Councillor face to face.

The council has 40 elected members representing twenty wards within the Cheltenham Borough. There are also five parish councils within the borough. Elections are held every two years, when 50% of the seats are offered for re-election. Additional elections may also arise from time to time if a councillor or parish councillor resigns from office. The Borough elections due to be held in May 2020 have been postponed to May 2021 due to the Covid-19 pandemic.

The political make-up of the council is:

Liberal Democrat Party	32 councillors
Conservative Party	6 councillors
People Against Bureaucracy Party	2 councillors

The Liberal Democrat group therefore has an overall majority of 24 on the Borough Council.

The council has adopted the Leader and Cabinet model as its political management structure arising from the Local Government and Public Involvement in Health Act 2007. The Leader of the Council has responsibility for the appointment of Members of the Cabinet, the allocation of Portfolios and the delegation of Executive Functions. Cabinet Members are held to account by a system of scrutiny which is

set out in the Constitution.

The Cabinet consists of the Leader and up to seven Deputies appointed by the Council. When major decisions are to be discussed or made, these are published in the Cabinet's Forward Plan in so far as they can be anticipated. If these decisions are to be discussed with council officers at a meeting of the Cabinet, this will generally be open for the public to attend except where personal or confidential matters are being discussed.

The Cabinet has to make decisions which are in line with the council's overall policies and budget. If it wishes to make a decision which is outside the Budget or Policy Framework, this must be referred to the Council (chaired by the Mayor) as a whole to decide.

The Cabinet for 2019/20 was made up as follows:

Leader of the Council	Councillor Steve Jordan
Deputy Leader of the Council and Cabinet Member Housing	Councillor Peter Jefferies
Cabinet Member Finance	Councillor Rowena Hay
Cabinet Member Healthy Lifestyles	Councillor Flo Clucas
Cabinet Member Development and Safety	Councillor Andrew McKinlay
Cabinet Member Clean and Green Environment	Councillor Chris Coleman
Cabinet Member Corporate Services	Councillor Alex Hegenbarth

The council budget for 2020/21, approved by full council on 17th February 2020, includes the intention to appoint a further two Cabinet members in 2020/21. This is to provide specific leads to support the growing environmental / climate change agenda and the economic development / growth agenda adopted by the council.

Members of the council nominate a Councillor each year to take on the roles of mayor and deputy mayor. The mayor is the first citizen of the borough. The Mayor's role is to chair council meetings and to lead the council at civic events. Each mayor traditionally elects local charities which are then supported throughout the year by charity events.

The Mayor and Deputy Mayor for 2019/20 were:

Mayor	Councillor Roger Whyborn
Deputy Mayor	Councillor Sandra Holliday

These appointments have continued in 2020/21, as the annual nominations and mayor making ceremony was cancelled in May 2020, due to the Covid-19 pandemic restrictions. Full details of all the council's committees, including chairs and membership can be found on the council's website at www.cheltenham.gov.uk.

Management Structure

Supporting the work of councillors is the organisational structure of the council, headed by the Executive Leadership team, led by the Chief Executive. This position is held by Mr Gareth Edmundson, who took over from the former Chief Executive, Mrs Pat Pratley in February 2020. During 2019/20 the Executive comprised of the Chief Executive and three Executive Directors, one of whom is also the statutory section 151 officer, Mr Paul Jones. The statutory role of monitoring officer / borough solicitor to the council is held by Ms Sara Freckleton.

Bankers

The council's banking services are provided by Lloyds Bank Plc, 130 High Street, Cheltenham, GL50 1EW.

External Auditor

The appointed external auditor in 2019/20 was Grant Thornton UK LLP, 2 Glass Wharf, Bristol BS2 0EL.

COUNCIL PLACE VISION

Cheltenham is a place that has thrived through centuries of change. It is a place we are proud of and passionate about, and we are committed to helping it grow and prosper in years to come.

Cheltenham is entering a period of significant change once again. Harnessing the opportunity for growth that this brings is absolutely critical for our town's future success. But we also acknowledge that Cheltenham's success is also dependent on the success of our neighbouring towns, cities and rural areas. We will use our place strategy to foster strong relationships beyond our boundaries that will help deliver our vision.

The council's place vision is of a vibrant Cheltenham that delivers the very best quality of life for its people. We believe that key elements in achieving this vision are to protect and enhance the built heritage and green spaces that have shaped the unique character of the town; to create the conditions in which businesses can thrive, innovate and provide good quality jobs; to make the town a world-class cultural and learning centre which is outward-looking and welcoming to visitors; to build strong, safe and healthy communities for residents and their families; to facilitate the provision of a wide-range of sustainable travel options and to accept our responsibility to present and future generations to live within environmentally sustainable limits.

Applying this vision, Cheltenham Borough Council has developed an overarching message designed to inspire employees and members to contribute effectively towards ensuring that the borough of Cheltenham remains successful, to set the ethos and culture of the council and to focus all officers' and members' efforts on a common goal. Our proposed vision for Cheltenham is simply: ***"We want Cheltenham to be a place where everybody thrives."*** We will do this by linking our heritage to an exciting future by being Creative, Pioneering, Nurturing, Connected and re-connected.

The council place strategy action plan will deliver the following four outcomes:

- Businesses thrive in Cheltenham
- Culture thrives in Cheltenham
- People thrive in Cheltenham
- Communities thrive in Cheltenham

PERFORMANCE MANAGEMENT

Performance management is a critical element of the council's management processes. The council is committed to a joined up approach to performance management that involves members and employees working together to ensure that the council continues to deliver on the issues that matter most to local people and to improve the quality of services at all levels. Our performance management system helps the council to identify what does and does not work and the factors that support or hinder economic, efficient and effective service delivery

In March 2019, council agreed a new look corporate plan that reflected the intentions to be clearer about what we were going to focus on and the reasons why.

The starting point for the new plan was Cheltenham's place vision; this is the collective commitment to ensure that Cheltenham is a place where everyone thrives supporting by a thriving economy, a thriving cultural offer and thriving communities. We made sure that the commitments in the new plan support this vision.

We also took stock of the organisation and involved a wide range of staff, elected members and external partners in discussions about the purpose of our organisation and how we want the organisation to look and feel.

As part of this, we also took time to consider strengths, weaknesses, opportunities and threats whilst also reflecting on our external environment.

With the better understanding of the council, we were able to develop a new corporate plan to guide us over the next three years through defining what we are trying to achieve - our purpose, how we will go about our work – our principles, and what we are going to focus on over the next three years – our priorities.

The council's agreed purpose is:

We want to make Cheltenham an even greater place for all; a place that is celebrated for its strong economy, its vibrant cultural offer and a place where our communities benefit from inclusive growth.

The council's agreed principles

- We will achieve inclusive growth so all our communities can benefit and prosper from investments made in the borough.
- We will be commercially focused where needed and become financially self-sufficient to ensure we can continue to achieve value for money for the taxpayer.
- We will use data and technology, including insight from our customers, residents, businesses and visitors to help us make the right business decisions.
- We will provide strategic co-ordination across Cheltenham's agencies, partnerships and networks to drive the delivery of the Place Vision.
- We will work in ways that encourage equal collaboration at all levels and we will take time to listen, understand and respect each other to ensure what we do is appropriate and empowering.
- We will invest in and develop our people so they can continue to provide excellent services to residents and are prepared to meet the opportunities and challenges ahead.

The council's agreed priorities

- Making Cheltenham the Cyber-Capital of the UK.
- Continuing the revitalisation and improvement of our vibrant town centre and public spaces.
- Achieving a cleaner and greener sustainable environment for residents and visitors.
- Increasing the supply of housing and investing to build resilient communities.
- Delivering services to meet the needs of our residents and communities.

Under each of the five priorities, the corporate plan sets out three areas for action. Out of the 15 areas for action, at 31 March:

- 12 (80%) were green and were on track to be delivered on time.
- 3 (20%) were amber, where there were some concerns about the deliverability of the project.

The council's Annual Performance Review for 2019/20 should be read in conjunction with the Statement of Accounts 2019/20 to obtain a balanced view of the council's work and finances.

SERVICE DELIVERY

The council puts a strong focus on designing community-focused outcomes and working closely with other parts of the public service and the voluntary and community sector (VCS), making objective, transparent, evidence-based decisions about how services should be provided and by whom.

Publica Group (Support) Limited

The council has entered several shared service and partnership arrangements with other organisations, to ensure the delivery of quality services in an efficient, cost-effective manner, including Publica Group (Support) Limited in 2017/18; providing the council's Information, Communications and Technology (ICT), Finance, Procurement and Human Resources support services shared with Cotswold District Council, West Oxfordshire District Council and Forest of Dean District Council, using a common platform (Business World Enterprise Resource Planning (ERP) system), enabling service resilience within the councils. Publica Group (Support) Limited is wholly owned by the four councils.

A key principle of the partnership is that each council has retained its own identity, with its own elected members and continues to make decisions taking account of the needs of its local community. Staff continue to work in each location. Some members of staff provide a service predominantly to one council; others provide a service for more than one council.

The Managing Director of Publica Group (Support) Limited is Mr Jan Brittan, who replaced the former Managing Director, Mr David Neudegg in December 2019.

Publica Group (Support) Limited has commenced a transformation programme which seeks to streamline practices and the organisation to ensure the delivery of efficient and value for money services for the partner councils.

South West Audit Partnership Limited (SWAP)

The council entered into a contract with South West Audit Partnership Limited (SWAP) on 1st April 2017 for the provision of the internal audit service. More details of SWAP are provided in the Related Parties note 14, page 49.

Ubico Limited

Ubico Limited was originally formed in 2012, wholly owned by its shareholders, Cheltenham Borough Council and Cotswold District Council. The company is responsible for delivering the shareholders' environmental services within their respective council boundaries. Forest of Dean District Council, Tewkesbury Borough Council and West Oxfordshire District Council joined the partnership on 1st April 2015. Stroud District Council and Gloucestershire County Council joined in 2016 and each of the seven authorities are now equal shareholders.

Social housing scheme developments

The Council is working in partnership with its ALMO (Arms Length Management Organisation), Cheltenham Borough Homes Limited (CBH), to deliver a development and acquisition programme that significantly increases our supply of homes in Cheltenham over the next five years.

Two new build schemes commenced in 2019/20, currently anticipated to deliver 35 new homes in 2020/21, and the Council is working with three developers to deliver a further 33 new homes as part of S106 agreements. The Council also acquired 27 dwellings during the year.

A significant land purchase was also completed in 2019/20 which will provide sites for future

affordable homes.

The Cheltenham Trust

The council's Leisure and Culture services are provided by The Cheltenham Trust. This is an independent charitable trust, contracted to supply leisure and cultural related services to Cheltenham Borough Council via a management agreement. The Cheltenham Trust operates from the Art Gallery & Museum (The Wilson), Town Hall, Pittville Pump Rooms, Leisure@ Recreation centre and the Prince of Wales Stadium, the buildings of which are all still owned by the council.

The Trust and the council work in partnership to create capital improvements, including the leisure centre, and new splashpad area, improved changing room facilities and extended gym space in 2018/19.

Cheltenham Development Task Force

The Task Force brings together volunteer specialists from the private, public and voluntary sectors who work in partnership, with a shared passion for Cheltenham. Their remit is to consider specific issues or sites and provide advice to Cheltenham Borough Council and Gloucestershire County Council.

A range of activities have been supported throughout 2019/20 including

- The continuation of works at Cheltenham Spa station by Great Western Railway. These works include a remodelled forecourt, additional parking, and an extension of the Honeybourne Line to provide pedestrian and cycling access to Lansdown Bridge. In addition access for all improvements including lifts are to be delivered by Network Rail.
- Preparations for the cyber park at West Cheltenham continued with GCC taking the lead from CBC to deliver the transport infrastructure changes secured via the successful GFirst Local Enterprise Partnership Growth Fund bid of £22m. In addition GCC and partners (Cheltenham and Tewkesbury) have submitted a major bid to upgrade J10 of the M5. CBC has also submitted a bid for Garden Communities status at West Cheltenham in support of the developments.

CHALLENGES

Local Government Finance

The Local Government Finance Settlement for 2013/14 marked the introduction of the new local government resource regime with a significant change in the way local authorities are financed. Under the new regime, more than 60% of the Council's Government funding comes directly from Business Rates and, as a consequence, has the potential to vary either upwards or downwards during the year. This is a key strand of the Government policy to localise financing of local authorities and brings the potential for increased risks or increased rewards.

The principles of the settlement allow authorities to spend locally what is raised locally, whilst recognising the savings already made by local government. Most noticeably, there has been a shift away from freezing council tax to using council tax to generate additional funding. Reserves are noted as being one element of an efficiency plan through a voluntary drawdown of reserves as the price for greater certainty for future settlements.

The Government's policy of phasing out revenue support grant and in due course potentially allowing councils to benefit from a higher share of business rates creates a need for this Council to develop a long-term strategy which is significantly different from that followed in past years. The Council has a direct financial interest in economic and business growth in the Borough, and will have a larger stake in it under the Government's proposals for reforming business rates.

Budget Strategy

There are a number of local challenges facing the council which will enable the council to close the funding gap. These include the delivery of our town centre regeneration aspirations, economic growth challenges in strategic sites like West and North West Cheltenham, delivery of the place strategy, and service transformation. However the council is innovative and has put in place extensive plans to ensure that we get the most out of our services at a reasonable cost.

In determining the budget strategy in November 2019, the Executive Director Finance and Assets continued to recommend the strengthening of the specific earmarked 'budget strategy (support) reserve', created in 2015 to provide greater resilience for the council's medium term financial strategy. The reserve will also help protect the council against the challenges which we know we will encounter in the coming years, some of which are expected to be short term.

Covid-19

The Covid-19 pandemic and subsequent lockdown announced in March 2020 has had a major impact on the finances of the council. Emergency expenditure totaling £73k was incurred in March 2020, mainly on protective equipment, setting up staff remote working and the continued delivery of waste management services through backfilling shielding staff. This is included in the Comprehensive Income and Expenditure account, page 17.

The council has closely monitored and reported the financial impact of the emergency, with expected irrecoverable income losses of £3.325m for 2020/21. This is mainly a result of reduced take up of car parking and other council services during the year. The irrecoverable shortfall against income budgets is expected to be partially offset by Government grant, the arrangements for which are to be finalised during the year.

Additional expenditure of £1.382m is expected to be incurred during 2020/21, including the additional cost of maintaining waste collection services, additional provision for homelessness, shielding, personal protection equipment and other support to the community. This has been matched by additional government grant funding received in 2020/21.

INTRODUCTION TO THE FINANCIAL STATEMENTS

The purpose of this narrative report is to provide electors, local taxpayers, members of the council and other interested parties with an easy to understand guide to the most significant matters reported in the accounts. It provides an explanation in overall terms of the council's financial position and assists in the interpretation of the accounting statements, including the Group Accounts. The statements should inform readers of the cost of services provided by the council in the year 2019/20 and the council's assets and liabilities at the year end.

The accounts for the year ending 31st March 2020 have been prepared and published in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 (the Code), published by the Chartered Institute of Public Finance and Accountancy (CIPFA). This incorporates International Financial Reporting Standards (IFRSs), ensuring the accounts are compliant with these standards. The following main statements and notes are included:

Statement of Responsibilities for the Statement of Accounts

Sets out the respective responsibilities of the council and the Section 151 Officer for the accounts.

Statement of Accounting Policies (note 1 to the notes to the accounts)

This explains the basis for the recognition, measurement and disclosure of transactions and other events in the accounts. It includes the basis of charges to revenue and the calculation of items in the Balance Sheet.

Comprehensive Income and Expenditure Statement supported by the Expenditure and Funding Analysis note

The Comprehensive Income and Expenditure Statement shows the cost in the year of providing services, in accordance with generally accepted accounting practices. The Expenditure and Funding Analysis reconciles this to the amount chargeable to General Fund and Housing Revenue Account reserves in the year.

Balance Sheet

This summarises the overall financial position of the council at the year end, showing its assets, liabilities and reserves.

Movement in Reserves Statement

This details the movement in the council's reserves during the year.

Cash Flow Statement

This summarises the inflows and outflows of cash arising from transactions with third parties for revenue and capital purposes.

Group Accounts

These bring together the accounts of Cheltenham Borough Council, Cheltenham Borough Homes Limited, and the council's share of the net assets of Gloucestershire Airport Limited and Publica Group (Support) Limited.

Housing Revenue Account (HRA)

A separate account, required by law, which shows income and expenditure associated with the provision of council housing.

Collection Fund

Reflects the statutory requirement to maintain a separate account showing transactions in relation to non-domestic (business) rates and council tax, indicating how the amounts collected are distributed to the Government, Gloucestershire County Council, Gloucestershire Police and Crime Commissioner and Cheltenham Borough Council.

Annual Governance Statement

This sets out how the council is meeting its obligations and the improvements it intends to make to its systems of internal control and corporate governance arrangements.

These accounts are supported by notes to the accounts and a glossary of terms to provide readers with further information.

THE COUNCIL'S FINANCIAL PERFORMANCE IN THE YEAR AND ITS POSITION AT THE YEAR END

General Fund Revenue Budget

During 2019/20 the council continued with the process of the formal monitoring of budgets, reporting to cabinet on a quarterly basis. This has assisted in strengthening the sound management of the council's finances and provides a mechanism to ensure that any budgetary problems are identified and rectified as soon as possible during the year. This has resulted in council services being delivered with an overall deficit compared to budget of £47,519. This budget deficit has been funded from the General Fund Balance.

REVENUE OUTTURN 2019/20	Note	Original Budget 19/20 £	Current Budget 19/20 £	Actual 19/20 £	(Under)/Overspend 19/20 £
DIRECTORATES:					
Chief Executive	(i)	1,362,599	1,366,299	1,375,943	9,644
Finance & Assets Directorate	(ii)	9,326,006	9,283,907	9,354,894	70,987
People & Change Directorate	(iii)	3,939,106	4,187,684	4,148,925	(38,759)
Place & Growth Directorate	(iv)	6,090,931	6,400,649	6,501,495	100,846
Net Expenditure on Services		20,718,642	21,238,539	21,381,257	142,718
Capital Charges		(2,959,971)	(3,119,243)	(3,144,967)	(25,724)
Interest payable and receivable		(2,757,427)	(2,433,959)	(2,356,338)	77,621
Use of balances and reserves		(170,157)	(913,509)	(928,163)	(14,654)
Total net expenditure		14,831,087	14,771,828	14,951,789	179,961
FINANCED BY:					
Council Tax income		(9,027,386)	(9,027,386)	(9,027,444)	(58)
Non-domestic rates income and expenditure		(2,683,686)	(2,508,891)	(2,558,742)	(49,851)
New homes bonus grant		(1,468,797)	(1,468,797)	(1,468,797)	-
S31 NDR compensation grant		(1,651,218)	(1,766,754)	(1,849,286)	(82,532)
Total Funding		(14,831,087)	(14,771,828)	(14,904,269)	(132,441)
(i) Includes Strategic Management, Democratic Services, Elections					
(ii) Includes Property & Assets, Treasury Management , Pensions backfunding					
(iii) Includes Housing Benefits, Revenues (council tax and business rates collection), Community Engagement, Commissioning & Modernisation					
(ii) Includes Building and Development control, Planning & housing enabling, Car parking, Bereavement services, Parks & Gardens, Public Protection					

The Expenditure and Funding Analysis on page 54 reconciles the above General Fund deficit, a decrease in earmarked reserves of £1,795k and a decrease in the HRA balance of £1,756k, with the deficit shown in the Comprehensive Income and Expenditure Statement, showing the adjustments made to ensure the statement complies with generally accepted accounting practice.

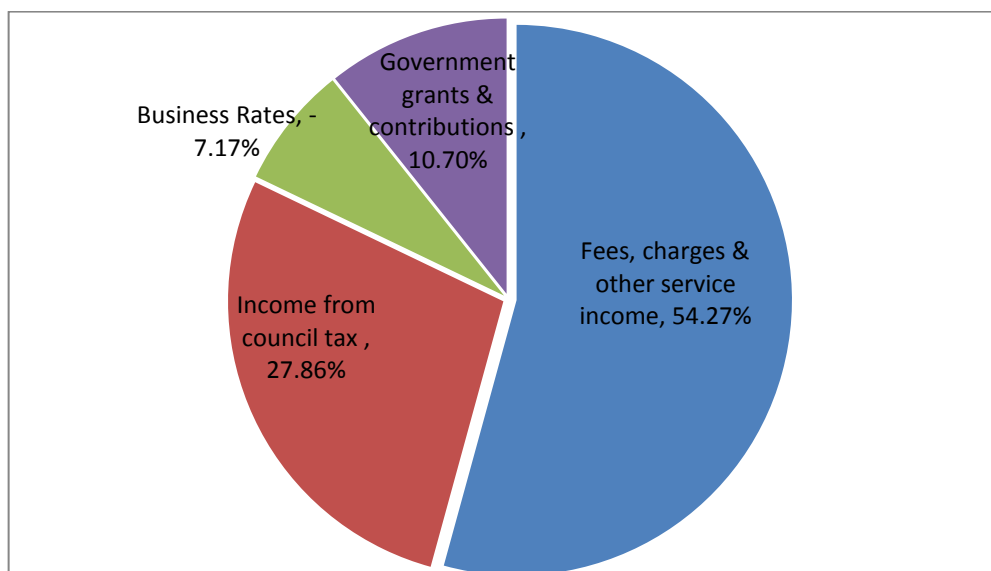
How the money was spent

The council provides a wide range of services, employing 227.83 full time equivalent staff at 31st March 2020. The activities vary widely and are summarised at service level as per the table below. Further details will be reported to Cabinet and Council as part of the Financial Outturn 2019/20 and budget monitoring to June 2020 report on 28th and 29th July 2020 respectively and will be available to view on the council's website <https://www.cheltenham.gov.uk>.

Service	Net (Income) Expenditure £
Bereavement Services	(973,800)
Buiding Control & Planning	844,156
Business Improvement & Modernisation	414,412
Car Parking	(1,636,073)
Community & Engagement	653,288
Council Tax and National Non Domestic Rates	207,538
Customer Services	417,020
Democratic & Civic	524,274
Economic	840,088
Elections	213,566
Flood Defence	143,260
Highways & Transport	267,256
Homelessness & Housing	694,449
Support Services - commissioned services	2,257,437
Leisure & Culture - commissioned services	1,046,653
Operational Buildings & Assets	3,985,068
Parks & Gardens & Open Spaces	2,050,585
Public Protection	567,922
Strategy, Policy & Corporate Management	1,660,833
Street Cleaning	896,206
Treasury & Pensions	3,598,957
Waste & Recycling	3,525,064
Total Directorate Expenditure by service	22,198,159

Where the money came from

The following chart provides an analysis of our main sources of income this year for the General Fund (i.e. it excludes income in respect of the Housing Revenue Account). The Government provides income in the form of general and specific grants, and determines the amount of business rates we receive through pooling arrangements. Since the new local government resource regime announced as part of the 2013/14 Local Government Finance settlement, more emphasis is now put on raising income from business rates and council tax locally, as the amount of central government revenue support grant received is phased out.



Housing Revenue Account (HRA)

The HRA generated a surplus in the year of £2.383 million, however after statutory adjustments (including the revenue financing of capital expenditure of £3.370 million), there was a reduction of £1.756 million in the HRA balance. This compared to a budgeted reduction of £7.3 million; the difference was due to the use of increased borrowing instead of revenue financing to fund capital expenditure. Full details of the Housing Revenue Account activity for the year are provided on pages 103 to 107.

Capital Expenditure

In 2019/20 the council spent £57.6 million on capital projects, grants and loans, across the general fund and the Housing Revenue Account capital programmes. Key expenditure on capital schemes include:-

	£ '000
- West Cheltenham / Cyber central land purchase	39,600
- Major repairs & improvements to existing housing stock	8,842
- New Housing Build and house acquisitions	5,686
- Vehicles & recycling equipment	1,699
- Enterprise Way Phase 2	534
- Disabled Facility Grants	410
- CCTV	213

The council plans to continue to fund capital from a range of sources including revenue reserves, developer contributions and capital receipts, and will make further use of prudential borrowing to support the council's major capital schemes where it is both prudent and affordable.

Treasury Management (Investments and borrowing)

Treasury Management in Local Government is governed by the CIPFA Code of Practice on Treasury Management in the Public Services and this council has adopted the Code and complies with its requirements, one of which is the receipt by the council of an Annual Review Report at the financial year end.

The council manages the cash flow arising from the provision of all council services, using the money market to invest daily cash surpluses and borrow to fund cash shortfalls.

The challenging economic climate continues to have an impact on the council's finances. The historically low Bank of England base rate continues to dampen the level of interest earned by the council's cash investments. The Bank of England reduced the base rate of 0.75% to 0.10% on 19th March 2020, as part of its measures to help support the economy during the Covid-19 pandemic.

During the year the council's General Fund paid £3.878 million in borrowing costs (which was £12,457 less than budgeted for the year) and earned £672,534 investment income (which was £3,625 more than budgeted). The overall impact was an under spend to the General Fund of £16,082 compared to the revised budget.

Pension Liability

The council is required to account for retirement benefits when they are committed, even if the payment is many years in the future, in accordance with International Accounting Standard 19 (IAS 19). The pension liability or asset shown in the accounts represents the council's pension commitment to increase contributions to make up any shortfall in attributable net assets, or its ability to benefit (via reduced future employer contributions) from a surplus in the pension scheme.

The council's net liability according to the actuarial assessment at 31st March 2020 was £51,307,000, a decrease of £6,951,000 over the figure for 31st March 2019 of £58,258,000. The financial assumptions at 31st March 2020 were more favourable than they were at 31st March 2019, resulting in a reduction in the pension liability.

Reserves, Balances and Provisions

At the year-end usable reserves stood at £23.5 million, a decrease of £5.2 million during the year.

The usable reserves at the year-end include non-earmarked General Reserves or 'Balances' of £1.273 million, general fund earmarked reserves of £4.5 million, £8.6 million capital receipts and £7.1 million HRA balances. The Movement in Reserves Statement on page 19 and note 32, page 76 gives a breakdown of the earmarked reserves.

At the year-end, Provisions (other than those held to cover possible bad or doubtful debts), were £1.486 million, a reduction of £0.148 million during the year. Most of these arise from the need to provide for potential reductions to business rateable values in future years.

Changes in accounting policies and estimates

The council has reviewed its accounting policies during the year and revised them as necessary in accordance with the 2019/20 Code of Practice in Local Authority Accounting. The policies are detailed in note 1 to the accounts (pages 21 to 39) and any changes in accounting policies are detailed in note 2 on page 40.

Impact of Covid-19 Pandemic on Council's finances

The Covid-19 pandemic and subsequent lockdown announced in March 2020 has had a major impact on the finances of the council. Emergency expenditure totaling £73k was incurred in March 2020, mainly on protective equipment, setting up staff remote working and the continued delivery of waste management services through backfilling shielding staff. This is included in the Comprehensive Income and Expenditure account, page 17.

The council has closely monitored and reported the financial impact of the emergency, with expected irrecoverable income losses of £3.325m for 2020/21. This is mainly a result of reduced take up of car parking and other council services during the year. The irrecoverable shortfall against income budgets is

expected to be partially offset by Government grant, the arrangements for which are to be finalised during the year.

Additional expenditure of £1.382m is expected to be incurred during 2020/21, including the additional cost of maintaining waste collection services, additional provision for homelessness, shielding, personal protection equipment and other support to the community. This has been matched by additional government grant funding received in 2020/21.

The council will also need to use some of its reserves to support the income losses in 2020/21. There will need to be a reassessment of earmarked reserves during 2020/21, to reprioritise projects and ensure that reserves are replenished and maintained at an adequate level.

Although the impact of the Covid-19 pandemic on the value of the council's non-current, Investment and some financial assets at 31st March was minimal, due to the pandemic impacting only from late March 2020, the long term effect is not known, resulting in there being a material uncertainty in the valuations of assets carried at existing use and fair value at 31st March 2020 (non-current assets, Investment property and some financial assets).

From late March 2020 the council had a key role in the distribution of the Government's Business and Retail, Hospitality and Leisure grants to support local businesses due to the Covid-19 pandemic, and up to 31st March 2020 £3.9 million of such grants had been paid, which was fully funded by the government in 2020/21.

FURTHER INFORMATION

Further information about the accounts is available from the Executive Director (Finance & Assets), Cheltenham Borough Council, Municipal Offices, Promenade, Cheltenham GL50 9SA. This is part of the council's policy of providing full information about the council's affairs.

In addition interested members of the public have a statutory right to inspect the accounts during a 'period for the exercise of public rights' before the audit is completed. The accounts are available for inspection by appointment between 3rd August 2020 and 11th September 2020 at the Municipal Offices, and local government electors for the area could exercise their rights to question the auditor about, or make objections to the accounts for the year ended 31st March 2020, in writing, during this period.

PAUL JONES FCPFA
EXECUTIVE DIRECTOR – FINANCE & ASSETS

STATEMENT OF RESPONSIBILITIES FOR THE STATEMENT OF ACCOUNTS

THE COUNCIL'S RESPONSIBILITIES:

The council is required:

- to make arrangements for the proper administration of its financial affairs and to ensure that one of its officers has the responsibility for the administration of those affairs. In this council, that officer is the Executive Director Finance & Assets, who also undertakes the role of the Section 151 Officer.
- to manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets.
- to approve the Statement of Accounts.

THE SECTION 151 OFFICER'S RESPONSIBILITIES:

The Section 151 Officer is responsible for the preparation of the council's Statement of Accounts in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Council Accounting in the United Kingdom (the Code).

In preparing the Statement of Accounts, the Section 151 Officer has:

- selected suitable accounting policies and then applied them consistently.
- made judgements and estimates that were reasonable and prudent.
- complied with the Code of Practice.

The Section 151 Officer has also:

- kept proper accounting records which were up to date
- taken reasonable steps for the prevention and detection of fraud and other irregularities.

CERTIFICATE OF SECTION 151 OFFICER

I certify that the Statement of Accounts on pages 17 to 20 gives a true and fair view of the financial position of the council at the reporting date and its income and expenditure for the year ended 31st March 2020.

PAUL JONES FCPFA
EXECUTIVE DIRECTOR – FINANCE & ASSETS

30th November 2020

COMPREHENSIVE INCOME AND EXPENDITURE STATEMENT

This statement shows the cost in the year of providing services in accordance with generally accepted accounting practices, rather than the amount to be funded from taxation. Authorities raise taxation to cover expenditure in accordance with regulations; and this may be different from the accounting cost. The taxation position is shown both in the Expenditure & Funding Analysis and in the Movement in Reserves Statement.

Gross expenditure £'000	2018/19 Gross income £'000	Net expenditure £'000		Gross expenditure £'000	2019/20 Gross income £'000	Net expenditure £'000
1,385	(83)	1,302	Chief Executive	2,047	(432)	1,615
7,443	(1,670)	5,773	Finance and Assets Directorate	8,775	(1,107)	7,668
30,477	(26,312)	4,165	People and Change Directorate	27,849	(23,211)	4,638
22,862	(12,683)	10,179	Place and Growth Directorate	22,051	(13,947)	8,104
16,492	(20,356)	(3,864)	Housing Revenue Account (HRA)	17,602	(20,218)	(2,616)
78,659	(61,104)	17,555	Cost of Services	78,324	(58,915)	19,409
652	(1,545)	(893)	Other operating expenditure (note 8)	719	(750)	(31)
7,064	(3,288)	3,776	Financing and Investment (income) and expenditure (note 9)	15,510	(5,379)	10,131
24,363	(40,541)	(16,178)	Taxation and non-specific grant (income) and expenditure (note 10)	19,611	(35,315)	(15,704)
110,738	(106,478)	4,260	(Surplus) or Deficit on the provision of services	114,164	(100,359)	13,805
<i>Items that will not be reclassified to the (Surplus) or Deficit on the provision of services</i>						
		(8,751)	(Surplus) or Deficit on revaluation of non-current assets (note 33)			(2,930)
		4,887	Remeasurement of the net defined benefit liability / (asset) (note 34)			(10,251)
		(1,265)	(Surplus) or deficit on revaluation of equity instruments carried at Fair Value through Other Comprehensive Income			-
		(5,129)	Other Comprehensive (Income) and Expenditure			(13,181)
		(869)	Total Comprehensive (Income) and Expenditure			624

The notes are shown on pages 21 - 88

BALANCE SHEET

This statement shows the value as at the balance sheet date of the assets and liabilities recognised by the council. The net assets of the council (assets less liabilities) are matched by the reserves held by the council. Reserves are reported in two categories. The first category is usable reserves i.e. those reserves that the council may use to provide services, these being subject to the need to maintain a prudent level and constrained by statutory limitations on their use (for example the Capital Receipts Reserve may only be used to fund capital expenditure or repay debt).

The second category of reserves comprises those that the council is not able to use to provide services. This includes those that hold unrealised gains and losses (for example the revaluation reserve), where amounts only become available to provide services if the assets are sold, and those that hold timing differences which are shown in the Movements in Reserves Statement Line 'Adjustments between accounting basis and funding basis under the regulations.'

31 March 2019	Note	31 March 2020
£'000		£'000
363,465 Property, Plant & Equipment	19	407,982
40,700 Heritage Assets	20	40,748
75,993 Investment Property	22	68,068
510 Intangible Assets	24	502
9,701 Long Term Investments	26	8,086
9,744 Long Term Debtors	26	10,739
500,113 Long Term Assets		536,125
8,123 Short term Investments	26	7,110
- Assets held for sale	25	60
100 Inventories		174
7,295 Short term Debtors	27	15,763
2,753 Cash and cash equivalents	28	21,169
18,271 Current assets		44,276
(598) Bank overdraft	28	-
(9,006) Short term borrowing	26	(70,095)
(14,034) Short term creditors	29	(15,771)
(476) Grants receipts in advance - capital	16	(2,287)
- Grants receipts in advance - revenue	16	(2,660)
(983) Provisions	30	(486)
(25,097) Current Liabilities		(91,299)
(651) Provisions	30	(1,000)
(111,965) Long term borrowing	26	(115,293)
(512) Grants receipts in advance - capital	16	(225)
(275) Grants receipts in advance - revenue	16	(275)
(58,258) Other long term liabilities	34	(51,307)
(171,661) Long term liabilities		(168,100)
321,626 Net Assets		321,002
(28,712) Usable Reserves	32	(23,529)
(292,914) Unusable Reserves	33	(297,473)
(321,626) Total Reserves		(321,002)

The notes are shown on pages 21 – 88

Signed Paul Jones, FCPFA; Executive Director – Finance & Assets

MOVEMENT IN RESERVES STATEMENT

This statement shows the movement in the year of the different reserves held by the council, analysed into 'usable reserves' (i.e. those that can be applied to fund expenditure or reduce local taxation) and unusable reserves.

The statement shows how the movements in year of the council's reserves are broken down between gains and losses incurred in accordance with generally accepted accounting practices and the statutory adjustments required to return the amounts chargeable to council tax (or rents) for the year. The net increase or decrease line shows the statutory general fund balance and Housing Revenue Account balance movements in the year following those adjustments.

	General Fund Balance £'000	Earmarked General Fund Reserves £'000	Total General Fund £'000	Housing Revenue Account £'000	Capital Receipts Reserve £'000	Major Repairs Reserve £'000	Capital Grants Unapplied £'000	Total Usable Reserves £'000	Unusable Reserves £'000	Total Reserves £'000
Balance at 31 March 2018	1,409	8,121	9,530	8,601	11,502	-	2,485	32,118	288,639	320,757
<u>Movement in Reserves during 2018/19</u>										
Total Comprehensive Income and (Expenditure)	(8,368)	-	(8,368)	4,108	-	-	-	(4,260)	5,129	869
Adjustments between accounting basis and funding basis under regulations (Note 5)	6,450	-	6,450	(3,884)	(1,610)	-	(102)	854	(854)	-
Transfers to/from earmarked reserves (Note 32)	1,830	(1,830)	-	-	-	-	-	-	-	-
Increase / (decrease) in 2018/19	(88)	(1,830)	(1,918)	224	(1,610)	-	(102)	(3,406)	4,275	869
Balance at 31 March 2019	1,321	6,291	7,612	8,825	9,892	-	2,383	28,712	292,914	321,626
<u>Movement in Reserves during 2019/20</u>										
Total Comprehensive Income and (Expenditure)	(16,188)	-	(16,188)	2,383	-	-	-	(13,805)	13,181	(624)
Adjustments between accounting basis and funding basis under regulations (Note 5)	14,345	-	14,345	(4,139)	(1,266)	-	(318)	8,622	(8,622)	-
Transfers to/from earmarked reserves (Note 32)	1,795	(1,795)	-	-	-	-	-	-	-	-
Increase / (decrease) in 2019/20	(48)	(1,795)	(1,843)	(1,756)	(1,266)	-	(318)	(5,183)	4,559	(624)
Balance at 31 March 2020	1,273	4,496	5,769	7,069	8,626	-	2,065	23,529	297,473	321,002

The notes are shown on pages 21 - 88

CASH FLOW STATEMENT

The cash flow statement shows the changes in cash and cash equivalents of the council during the reporting period. The statement shows how the council generates and uses cash by classifying cash flows as operating, investing and financing activities. The amount of net cash flows arising from operating activities is a key indicator of the extent to which operations of the council are funded by way of taxation and grant income or from the recipients of services provided by the council. Investing activities represent the extent to which cash flows have been made for resources which are intended to contribute to the council's future service delivery. Cash flows arising from financing activities are useful in predicting claims on future cash flows by providers of capital (i.e. borrowing) to the council.

2018/19 £'000		2019/20 £'000
4,260	Net (surplus) or deficit on the provision of services	13,805
(16,989)	Adjust net surplus or deficit on the provision of services for non-cash movements (note 35)	(26,122)
3,005	Adjust for items in the net surplus or deficit on the provision of services that are investing or financing activities (note 35)	3,462
(9,724)	Cash (inflows) / outflows generated from operating activities	(8,855)
59,455	Investing activities (note 36)	53,685
(49,643)	Financing activities (note 37)	(63,844)
88	Net (increase) / decrease in cash and cash equivalents	(19,014)
2,243	Cash and cash equivalents at beginning of the year	2,155
2,155	Cash and cash equivalents at end of the year (note 28)	21,169
(88)	Net increase / (decrease) in cash and cash equivalents	19,014

The notes are shown on pages 21 - 88

NOTES TO THE ACCOUNTS

1. ACCOUNTING POLICIES

1.1 GENERAL PRINCIPLES

The Statement of Accounts summarises the council's transactions for the financial year and its position at the end of the financial year. The council is required to prepare an annual Statement of Accounts by the Accounts and Audit (England) Regulations 2015, which require the accounts to be prepared in accordance with proper accounting practices. These practices primarily comprise the CIPFA/LASAAC Code of Practice on Local Government Accounting in the United Kingdom 2019/20 (The Code) supported by International Financial Reporting Standards (IFRS's), International Accounting Standards (IAS's) and statutory guidance.

The accounting convention adopted by the Statement of Accounts is principally historic cost, modified by the revaluation of certain categories of non-current assets and financial instruments.

The accounting policies of the council have as far as possible been developed to ensure that the accounts are understandable, relevant, free from material error or misstatement, reliable and comparable.

1.2 ACCOUNTING CONCEPTS

Except where specified in the Code, or in specific legislative requirements, it is the council's responsibility to select and regularly review its accounting policies, as appropriate.

These accounts are prepared in accordance with a number of fundamental accounting principles:

- Relevance
- Reliability
- Comparability
- Materiality

Additionally three further concepts play a pervasive role in the selection and application of accounting policies:

Accruals of Income and Expenditure

The financial statements, other than the cash flow statement, are prepared on an accruals basis, i.e. transactions are reflected in the accounts in the year in which the activity to which they relate takes place, not simply when cash payments are made or received. In particular:

- Fees, charges and rents due from customers are accounted for as income at the date the council provides the relevant goods or services, in accordance with the performance obligations in the contract and IFRS15 Revenue Contracts with Customers. These are fees and charges such as car parking fees, bereavement services fees, planning applications and building control fees.
- Supplies are recorded as expenditure when they are consumed – where there is a gap between the date supplies are received and their consumption, they are carried as Inventories on the Balance Sheet.
- Expenses in relation to services received (including services provided by employees) are recorded as expenditure when the services are received rather than when payments are

made.

- Interest payable on borrowings and receivable on investments is accounted for on the basis of the effective interest rate for the relevant financial instrument rather than the cash flows fixed or determined by the contract.
- Where income and expenditure has been recognised but cash has not been received or paid, a debtor or creditor for the relevant amount is recorded in the Balance Sheet. Where it is doubtful that debts will be settled, the balance of debtors is written down and a charge made to revenue for the income that might not be collected.
- All income and expenditure is credited and charged to the Comprehensive Income and Expenditure Statement, unless it comprises capital receipts or capital expenditure.

Going Concern

The accounts are prepared on the assumption that the council will continue its operations for the foreseeable future. This means in particular that the Comprehensive Income and Expenditure Statement and Balance Sheet assume no intention to significantly curtail the scale of operations.

Primacy of legislative requirements

The council derives its powers from statute and its financial and accounting framework is closely controlled by primary and secondary legislation. Where legislative requirements and accounting principles conflict, legislative requirements take precedence.

1.3 EMPLOYEE BENEFITS

Benefits Payable during Employment

Short-term employee benefits are those due to be settled within twelve months of the year-end. They include such benefits as salaries and wages, paid annual leave and paid sick leave for current employees and are recognised as an expense for services in the year in which employees render service to the council. An accrual is made for the cost of holiday entitlements (or any form of leave, e.g. time off in lieu) earned by employees but not taken before the year-end, which employees can carry forward into the next financial year. The accrual is made at the salary rates applicable in the following accounting year, being the period in which the employee takes the benefit. The accrual is charged to the Surplus or Deficit on the Provision of Services, but then reversed out through the Movement in Reserves Statement so that holiday benefits are charged to revenue in the financial year in which the holiday absence occurs.

Termination Benefits

Termination benefits are amounts payable as a result of a decision by the council to terminate an officer's employment before the normal retirement date or an officer's decision to accept voluntary redundancy. They are charged on an accruals basis to the relevant service line in the Comprehensive Income and Expenditure Statement when the council can no longer withdraw the offer of any benefits.

Where termination benefits involve the enhancement of pensions, statutory provisions require the general fund balance to be charged with the amount payable by the council to the pension fund or pensioner in the year, not the amount calculated according to the relevant accounting standards. Therefore in the Movement in Reserves Statement appropriations are required to and from the pensions reserve to remove the notional charges and credits for pension enhancement termination benefits, and replace them with the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year end.

Post-Employment Benefits

Employees of the council are members of the Local Government Pension Scheme, administered by Gloucestershire County Council. The scheme provides defined benefits to members (retirement lump sums and pensions), earned as employees worked for the council, and is accounted for as a defined benefits scheme:

- The liabilities of the Gloucestershire pension scheme attributable to the council are included in the Balance Sheet on an actuarial basis using the projected unit method – i.e. an assessment of the future payments that will be made in relation to retirement benefits earned to date by employees, based on assumptions about mortality rates, employee turnover rates, etc, and projections of earnings for current employees.
- Liabilities are discounted to their value at current prices, using a discount rate based on the indicative rate of return on the adoption of the AA-rated corporate bond basis.
- The assets of the Gloucestershire pension fund attributable to the council are included in the balance sheet at their fair value on the following basis:
 - quoted securities – current bid value
 - unquoted securities – professional estimate of fair value
 - unitised securities – current bid price
 - property – market value.
- The change in the net pension liability is analysed into seven components:
 - Current service cost: the increase in liabilities as a result of the additional year of service earned - allocated in the Comprehensive Income and Expenditure Statement to the services for which the employees worked.
 - Past service cost: the increase in liabilities arising from current year decisions whose effect relates to years of service earned in earlier years - charged to the Surplus or Deficit in the Comprehensive Income and Expenditure Statement as part of Non Distributed Costs.
 - Interest cost on defined obligation: the expected increase in the present value of liabilities during the year as they move one year closer to being paid - charged to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.
 - Interest income on plan assets: the annual investment return on the fund assets attributable to the council, based on an average of the expected long-term return – credited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.
 - Gains/losses on settlements: the result of actions to relieve the council of liabilities or events that reduce the expected future service or accrual of benefits of employees – charged to the Cost of Services in the Comprehensive Income and Expenditure Statement as part of Non Distributed Costs.
 - Measurement of the net defined benefit liability: changes in the net pension liability that arise because events have not coincided with assumptions made at the last actuarial valuation or because the actuaries have updated their assumptions – charged to the Pensions Reserve.
 - Contributions paid to the Gloucestershire pension fund: cash paid as employer's contributions to the pension fund, in settlement of liabilities.

Statutory provisions limit the amount chargeable to council tax to that payable by the council to the pension fund in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement this means that there are appropriations to and from the Pension Reserve to remove the notional charges and credits for retirement benefits and replace them with the cash paid to the pension fund and any amounts payable to the fund but unpaid at the year end.

The negative balance that arises on the Pensions Reserve thereby measures the beneficial impact to the General Fund of being required to account for retirement benefits on the basis of cash flows rather than as benefits are earned by employees.

Discretionary Benefits

The council has restricted powers to make discretionary awards of retirement benefits in the event of early retirements. Any liabilities estimated to arise as a result of an award to any member of staff are accrued in the year of the decision to make the award, and accounted for using the same policies as are applied to the Local Government Pension Scheme.

1.4 GRANTS AND CONTRIBUTIONS

Grants and contributions received from the government and other organisations are credited to the Comprehensive Income and Expenditure Statement unless any conditions attached to the grant or contribution have not been satisfied. For example conditions may be stipulated that specify that the grants or contributions are required to be consumed by the recipient as specified, or they must be returned to the transferor.

Amounts received as grants and contributions for which conditions have not been satisfied are carried on the Balance Sheet as Revenue or Capital Grants Received in Advance. When the conditions are satisfied, the grant or contribution is credited to the relevant service line (if ring-fenced) or Taxation and Non-Specific Grant Income (non-ring-fenced revenue grants and all capital grants) in the Comprehensive Income and Expenditure Statement.

Where capital grants are credited to the Comprehensive Income and Expenditure Statement, they are reversed out of the General Fund Balance in the Movement in Reserves Statement, so that they are available to fund capital expenditure. Where the grant has yet to be used to finance capital expenditure, it is credited to the Capital Grants Unapplied reserve. Where it has been applied it is credited to the Capital Adjustment Account. Amounts in the Capital Grants Unapplied reserve are transferred to the Capital Adjustment Account once they have been applied to fund capital expenditure.

1.5 OVERHEADS AND SUPPORT SERVICES

The authority operates and manages its overheads (including telephones and printing costs) and corporate and support services separately and expenditure relating to these activities is reported to key decision makers as separate activities. These overheads are not therefore apportioned to services within the general fund. Overhead charges between the General fund and Housing Revenue services, however, continue to apply.

1.6 COUNCIL TAX RECOGNITION

Council Tax receivable for the financial year is recognised in the Collection Fund, a separate statutory account maintained by billing authorities. The Fund is charged with the council tax requirements ('precepts and demands') set by the major preceptors and billing authority before the

start of the year, leaving (after providing for uncollectable debts) a surplus or deficit, which is then distributed to the same authorities in future years in proportion to their precepts or demands.

The council tax income included in the council's Comprehensive Income and Expenditure Statement for the year represents its 'demand' for the year, plus its share of the collection fund surplus or deficit for the year, before any distribution. Because the amount of surplus or deficit that can be credited or charged to the council's general fund is governed by statute, and is limited to that declared at the start of the year, adjustments are made in the Movement in Reserves Statement to the collection fund adjustment account to reflect the difference between the surplus or deficit due for the year and that which can be released according to statute.

There is no statutory requirement for a separate collection fund balance sheet. Instead the fund balances (arrears, over/pre-payments, bad debts provision and accumulated surpluses or deficits) are distributed across the balance sheets of the billing authority and the major preceptors, in proportion to their precepts and demands. The council, as a billing authority, therefore accounts for council tax balances on an agency basis, showing only its share of the fund balances on its balance sheet.

1.7 NATIONAL NON-DOMESTIC RATES (NNDR) INCOME RECOGNITION

NNDR income is recognised in the same way as council tax described above, with the exception that the net income and surplus/deficit credited or charged to the Comprehensive Income and Expenditure Statement is shared between the billing authority, the county council and central government in statutory proportions. NNDR balances are also distributed across their balance sheets in the same proportions.

1.8 VAT

Income and expenditure excludes any amounts related to VAT, as all VAT collected is payable to HM Revenue and Customs and all VAT paid is recoverable from them.

1.9 NON-CURRENT ASSETS - RECOGNITION OF CAPITAL EXPENDITURE

The council recognises non-current assets when expenditure is incurred on assets:

- held for use in the production or supply of goods or services, rental to others, or for administrative purposes
- expected to be used for more than one financial period
- where it is expected that the future economic benefits associated with the asset will flow to the council
- where the cost can be measured reliably.

The initial cost of an asset is recognised to be:

- Purchase price, construction cost, minimum lease payments or equivalent including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates.
- Costs associated with bringing the asset to the location and condition necessary for it to be capable of operating in the manner required by management.
- Any costs of dismantling and removing an existing asset and restoring the site on which it is located.

The cost of an asset acquired other than by purchase or construction is deemed to be its fair

value, except where an asset is acquired via an exchange it is deemed to be the carrying amount of the asset given up by the council.

Donated assets are measured initially at fair value. The difference between their fair values and any consideration paid is credited to the Taxation and Non Specific Grant Income line in the Comprehensive Income and Expenditure Statement, unless the donation has been made conditionally. Until conditions are satisfied, the gain is held in a Donated Assets Reserve account. Where gains are credited to the Comprehensive Income and Expenditure Statement they are reversed out of the General Fund Balance to the Capital Adjustment Account in the Movement in Reserves Statement.

Subsequent 'enhancement' expenditure is treated as capital expenditure when it is considered it will increase the value of the asset or its useful life or increase the extent to which the council can use the asset.

De Minimis policy - expenditure below £10,000 (excluding VAT) is not treated as capital expenditure except where the sum of identical assets purchased exceeds this figure, as is the case with waste collection bins and caddies.

Capital assets are held on the Balance Sheet as Non-Current Assets.

1.10 NON-CURRENT ASSETS - PROPERTY, PLANT AND EQUIPMENT (PPE)

Assets that have physical substance and are held for use in the provision of services, for rental to others, or for administrative or other operational purposes on a continuing basis are classified as Property, Plant and Equipment. Such assets are categorised as Council Dwellings, Other Land and Buildings, Vehicles Plant and Equipment, Infrastructure, Community Assets, Surplus Assets and Assets Under Construction.

Infrastructure assets are inalienable assets, expenditure on which is only recoverable by continued use of the asset and there is no prospect for sale or alternative use. Examples include footpaths, cycle tracks, bridges, street furniture and drainage systems.

Community Assets are assets that the authority intends to hold in perpetuity, have no determinable useful lives and which may have restrictions on their disposal. Examples include parks, gardens, cemeteries land, allotments and open spaces used for recreation.

Surplus Assets are assets which are not being used to deliver services or for administrative purposes but which do not meet the definition of Investment properties or Assets Held for Sale.

Recognition

Expenditure on the acquisition, creation or enhancement of Property, Plant and Equipment is capitalised on an accruals basis, provided that it yields benefits to the council for more than one financial year and the cost of the item can be measured reliably. This excludes expenditure on routine repairs and maintenance, which is charged directly to service revenue accounts when it is incurred.

Measurement

PPE assets are initially measured at cost, comprising all expenditure that is directly attributable to bringing the asset into working condition for its intended use. The council does not capitalise borrowing costs incurred whilst assets are under construction.

The assets are then carried on the Balance Sheet using the following measurement bases:

- Dwellings – Current value, using the basis of existing use value for social housing (EUV-SH)
- Other Land and Buildings – Current value, using the basis of existing use value (EUV) where an active market exists or Depreciated Replacement Cost (DRC), where there is no active market for the asset or it is specialised
- Infrastructure – depreciated historic cost
- Community assets – historic cost (where known). The cost of many of the council's parks, gardens and open spaces is not known and they are therefore shown at Nil value. The Code offers the option for authorities to measure community assets at valuation, which is the requirement for Heritage assets. The council has so far not adopted to change its accounting policy in this way as it does not currently have the management information to make reasonable valuation estimates of community assets.
- Assets under construction – historic cost
- Surplus Assets – Current value, using the Fair Value basis (see paragraph 1.19 *Fair Value Measurement*).
- In the case of assets that have short useful lives or low values (or both) i.e. Vehicles, Plant and Equipment, depreciated historic cost is used as a proxy for current value.

Assets included in the Balance Sheet at Current value are re-valued where there have been material changes during the year, and as a minimum every five years.

Where there is an upward revaluation, the carrying value is increased and the gain credited to the Revaluation Reserve. This is reflected in the Comprehensive Income and Expenditure Statement as a revaluation gain, included in Other Comprehensive Income and Expenditure. Exceptionally, gains are credited to the Surplus or Deficit on the Provision of Services (and not the Revaluation Reserve) where a revaluation loss or impairment in respect of that asset was previously charged to a service revenue account (adjusted for the depreciation that would have been charged had the revaluation or impairment losses not occurred).

Where decreases in value are identified, they are accounted for as follows:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains)
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line in the Comprehensive Income and Expenditure Statement.

The Revaluation Reserve contains revaluation gains recognised since 1st April 2007 only, the date of its formal implementation. Gains arising before that date have been consolidated into the Capital Adjustment Account.

Impairment

PPE assets are assessed at the end of each year for evidence of impairment. Where evidence exists and the effect is considered material, the recoverable amount of the asset is estimated and, where this is less than the carrying amount of the asset, an impairment loss is recognised for the difference.

Where there are revaluation gains for the asset in the Revaluation Reserve the impairment loss is written down against that balance (up to the amount of the accumulated gains).

Where there are no gains in the Revaluation Reserve or an insufficient balance to meet the impairment loss, the remaining loss is written down against the relevant service line in the Comprehensive Income and Expenditure Statement.

Where an impairment loss is subsequently reversed, the reversal is credited to the relevant service line in the Comprehensive Income and Expenditure Statement, up to the amount of the original loss, adjusted for depreciation that would have been charged if the loss had not been recognised.

Depreciation

Depreciation is provided for on all Property, Plant and Equipment assets with a determinable finite useful life, by writing down the carrying value of the asset in the Balance Sheet over the remaining periods expected to benefit from their use. Assets not depreciated are those without a determinable finite useful life (land and Community and Heritage assets), assets that are not yet available for use (assets under construction) and assets reclassified as Held for Sale.

Depreciation is calculated on the following bases:

- Council dwellings – straight-line allocation over each significant component's estimated useful life
- Other buildings, Vehicles, Plant, Furniture and Equipment, Infrastructure, Surplus assets – straight-line allocation over the asset's estimated useful life.

Newly acquired assets are depreciated from the year following that in which they were acquired, although assets in the course of construction are not depreciated until they are brought into use.

Revaluation gains are also depreciated, with an amount equal to the difference between current value depreciation charged and the depreciation that would have been charged based on their historical cost being transferred each year from the Revaluation Reserve to the Capital Adjustment Account.

Assets disposed of during the year are depreciated in the year of disposal or in the case of assets reclassified as Held for Sale, in the year they were reclassified.

Componentisation

Where a *material* item of Property Plant and Equipment has components whose cost is *significant* in relation to the total cost of that item, *and* which have different estimated useful lives and/or depreciation methods, they are identified as separate assets and depreciated separately.

The council's current Componentisation Policy for non-dwelling assets defines a material item as an individual building exceeding a gross book value of £872,100 and a significant individual component as one which exceeds 20% of the gross replacement cost of that building. Significant components are identified as separate assets and separately depreciated if their estimated useful lives are considered significantly different to the 'host' building or other components. 'Material' buildings are considered for componentisation whenever such a building is acquired, enhanced, or revalued after 1 April 2010.

With effect from 1st April 2017 separate building components (including the 'host' or residual building) have been identified for dwellings where their current replacement cost and useful lives can be estimated reliably.

1.11 NON-CURRENT ASSETS - HERITAGE ASSETS

Assets with historical, artistic, scientific or technological qualities held principally for their contribution to knowledge or culture.

The council's collections of heritage assets are accounted for as follows:

Ceramics, Art, Regalia and Silverware, Furniture, Textiles, Ephemera, other collectables

These are reported in the Balance Sheet at their current insurance valuation, which is based on market values.

Statues and Monuments

These are reported in the Balance Sheet at their current insurance valuation, which is based on historic or replacement cost.

Archaeology

The council cannot obtain reliable cost or valuation information for its archaeological collection. This is because of the diverse nature of the assets held and lack of comparable market values. Consequently the council does not recognise these assets on its balance sheet.

The insurance valuations are updated for inflation on an annual basis, with gains credited to the Revaluation Reserve. The council has deemed that all the heritage assets have indeterminate lives, hence it does not consider it appropriate to charge depreciation.

The carrying amounts of heritage assets are reviewed where there is evidence of impairment. Any impairment is recognised and measured in accordance with the council's policy on impairment for Property, Plant and Equipment. Occasionally the council will dispose of heritage assets. These are accounted for in accordance with the council's policy on disposals and assets held for sale.

1.12 NON-CURRENT ASSETS - INVESTMENT PROPERTY

Investment properties are those that are used *solely* to earn rentals and/or for capital appreciation. The definition is not met if the property is used in any way to facilitate the delivery of services or production of goods or is held for sale.

Investment properties are measured initially at cost and subsequently at fair value (see paragraph 1.19 *Fair Value Measurement*). Properties are not depreciated but are revalued annually unless their carrying value can be demonstrated to be not materially different to fair value at the balance sheet date. Gains and losses on revaluation are posted to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement. The same treatment is applied to gains and losses on disposal. Such gains and losses, however, are not permitted by statutory arrangements to have an impact on the General Fund Balance and are therefore reversed out in the Movement in Reserves Statement and credited to the Capital Adjustment Account and (for any sale proceeds greater than £10,000) the Capital Receipts Reserve.

Rentals received in relation to investment properties are credited to the Financing and Investment Income line in the Comprehensive Income and Expenditure Statement.

1.13 NON-CURRENT ASSETS - INTANGIBLE ASSETS

Expenditure on assets that do not have physical substance and which are controlled by the entity through custody or legal rights (e.g. software licences), is capitalised when it will bring benefits to

the council for more than one financial year. Internally generated assets are capitalised where it can be demonstrated that the project is technically feasible, is intended to be completed (with adequate resources being available), where the council will be able to generate future economic benefits or deliver service potential by being able to sell or use the asset, and where the expenditure during the development phase can be reliably measured.

Intangible assets are measured at cost, which is amortised over the estimated useful life of the asset to the relevant service line in the Comprehensive Income and Expenditure Statement, to reflect the pattern of consumption of benefits. Estimated remaining useful lives are reviewed annually and an asset is tested for impairment whenever there is an indication that the asset might be impaired – any losses recognised are charged to the relevant service line in the Comprehensive Income and Expenditure Statement. Any gain or loss arising on the disposal or cessation of use of an intangible asset is credited or charged to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement.

Amortisation, impairment losses and disposal gains and losses are not permitted to have an impact on the General Fund Balance, so they are reversed out of the General Fund Balance in the Movement in Reserves Statement and charged or credited to the Capital Adjustment Account with any sale proceeds greater than £10,000 credited to the Capital Receipts Reserve.

1.14 NON-CURRENT ASSETS – DISPOSALS AND ASSETS HELD FOR SALE

When it becomes probable that the carrying amount of an asset will be recovered principally through a sale transaction rather than through its continuing use, it is reclassified as an Asset Held for Sale. Assets are classified as held for sale where the asset is available for immediate sale in its present condition and where the sale is highly probable i.e. the asset has been advertised for sale and a buyer sought and the completion of the sale is expected within twelve months of the balance sheet date. Dwellings sold under Right to Buy are deemed to become surplus on the day that the transfer to the tenant takes place (completion of the sale), and are therefore considered operational until they are sold.

Except when carried at (depreciated) historic cost, an asset is revalued immediately before its reclassification as Held for Sale, using its existing category's measurement basis. Following reclassification assets are measured at the lower of their carrying values and fair values less costs to sell. Any subsequent gains in value are first used to reverse any losses previously charged to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement and thereafter recognised in the Revaluation Reserve. Losses in value are charged to the Surplus or Deficit on the Provision of Services (even when there is a balance held for that asset in the Revaluation Reserve).

Depreciation is not charged on Assets Held for Sale, except in the year in which they were classified as held for sale.

If assets no longer meet the criteria to be classified as Assets Held for Sale, they are reclassified as non-current assets (Property, Plant and Equipment, Investment or Heritage assets) and valued at the lower of their carrying amount before they were classified as held for sale (adjusted for depreciation, amortisation or revaluations that would have been recognised had they not been classified as Held for Sale), and their recoverable amount at the date of the decision not to sell.

When an asset is disposed of, or decommissioned, the carrying amount of the asset in the Balance Sheet (whether Property, Plant and Equipment, Heritage or Assets Held for Sale) is written off to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Receipts from disposals (if any) are credited to the same line in the Comprehensive Income and Expenditure Statement, also as part of the gain or loss on disposal (i.e. netted off against carrying value of the asset at the time of disposal). Any revaluation gains accumulated for the asset in the Revaluation Reserve are written off to the

Capital Adjustment Account.

Amounts received from a disposal in excess of £10,000 are categorised as capital receipts. A proportion of receipts relating to Housing Revenue Account (HRA) disposals, as specified by statutory regulations, is payable to the Government. The balance of receipts is required to be credited to the Usable Capital Receipts Reserve, and can then only be used for new capital investment or set aside to reduce the council's underlying need to borrow (the Capital Financing Requirement). Receipts are appropriated to the Reserve from the General Fund Balance in the Movement of Reserves Statement.

The written-off value of disposals is not a charge against council tax, as the cost of non-current assets is fully provided for under separate arrangements for capital financing. Such amounts are therefore appropriated to the Capital Adjustment Account from the General Fund Balance in the Movement in Reserves Statement.

1.15 REVENUE EXPENDITURE FUNDED FROM CAPITAL UNDER STATUTE (REFCUS)

Expenditure incurred during the year that may be capitalised under statutory provisions but does not result in the creation of non-current assets is charged to the relevant service revenue account in the year. To the extent the council has determined to meet the cost of this expenditure from capital resources (borrowing, capital receipts or grants) a transfer to the Capital Adjustment Account via the Movement in Reserves Statement reverses out the amounts charged to the General Fund Balance so there is no impact on the level of council tax.

1.16 CHARGES TO REVENUE FOR NON-CURRENT ASSETS

Service revenue accounts, support services and trading accounts are charged with the following amounts to record the real cost of holding assets during the year:

- Depreciation of property, plant and equipment used by the relevant service
- Amortisation of intangible assets used by the service
- Revaluation and impairment losses, where there are no accumulated gains in the Revaluation Reserve against which the losses can be charged.

The council cannot raise council tax to cover depreciation, amortisation or revaluation and impairment losses. It is, however, required to make an annual provision (known as Minimum Revenue Provision or MRP) from revenue towards reducing its overall borrowing requirement, equal to an amount calculated on a prudent basis by the council in accordance with statutory guidance. The above charges to the General Fund are therefore reversed out of the General Fund Balance and replaced by a MRP contribution to the Capital Adjustment Account in the Movement of Reserves Statement.

1.17 LEASES

Leases are classified as either Finance Leases or Operating Leases. Arrangements that do not have the legal status of a lease but convey the right to use an asset in return for payment are accounted for under this policy where fulfilment of the arrangement is dependent on the use of specific assets.

Defining a Finance Lease

Leases are classified as finance leases where the terms of the lease transfer substantially all the risks and rewards incidental to ownership of the property, plant or equipment from the lessor to the lessee. This is likely to apply if some or all of the following situations are met:

- If the lessee will gain ownership of the asset at the end of the lease term (e.g. in the case of hire purchase)
- If the lessee has an option to purchase the asset at a sufficiently favourable price that it is reasonably certain, at the inception of the lease, that it will be exercised
- If the lease term is for the major part of the economic life of the asset, even if title is not transferred. The economic life of the asset is deemed to be consistent with the useful life of the asset in the depreciation policy. The council recognises the major part to be 75% of the life of the asset, unless on an individual case basis this would not give a true representation of the substance of the transaction
- At the inception of the lease, the present value of the minimum lease payments amounts to at least substantially all of the fair value of the leased asset. The present value of the minimum lease payments is calculated by discounting at the rate inherent in the lease. If this rate cannot be determined the incremental borrowing rate applicable for that year is used. The council recognises “substantially all” to mean 90% of the value of the asset. In some circumstances, a level of 75% is used if the council believes that using this level will give a result that better reflects the underlying transaction
- The leased assets are of such a specialised nature that only the lessee can use them without major modifications
- If the lessee cancels the lease, the lessor’s losses associated with the cancellation are borne by the lessee
- Gains or losses from the fluctuation in the fair value of the residual accrue to the lessee (e.g. in the form of a rent rebate equalling most of the sales proceeds at the end of the lease)
- The lessee has the ability to continue the lease for a secondary period at a rent that is substantially lower than market rent.

Where a lease covers both land and buildings, the land and buildings elements are considered separately for classification.

Lessee Accounting for a finance lease

Where the council is leasing an asset (for example as a tenant) that is deemed a finance lease, it will recognise that asset within its asset register, and account for that asset as though it were an owned asset.

The initial recognition of the asset is at the fair value of the asset, or if lower, the present value of the minimum lease payments. A liability (less any premium paid) may also be recognised at this value, which is reduced as lease payments are made. Lease payments made to the lessor are

split between the reduction in the liability and interest, which is charged to the Comprehensive Income and Expenditure Statement.

Lessor Accounting for a finance lease

Where the council grants a finance lease over property or items of plant or equipment the carrying values of the relevant assets are written out of the Balance Sheet to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement, as part of the gain or loss on disposal. The amount receivable on disposal (representing the minimum lease payments due), is credited to the same line in the Comprehensive Income and Expenditure Statement, also as part of the gain or loss on disposal, matched by a cash receipt (if a premium has been paid) or a long term debtor (if to be settled by payments in future years) on the Balance Sheet.

The amount receivable on disposal is not permitted by statute to increase the General Fund Balance and is required to be treated as a capital receipt. Where a premium has been received this is posted out of the General Fund Balance to the Capital Receipts Reserve in the Movement in Reserves Statement.

Where the amount due under the lease is settled by payments in future years the amount receivable on disposal is posted out of the General Fund Balance to the Deferred Capital Receipts Reserve. When received future lease payments are apportioned between:

- a charge for the acquisition of the assets, which reduces the lease debtor
- finance interest, which is credited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.

An amount equivalent to the charge for the acquisition of the assets is at the same time transferred from the Deferred Capital Receipts Reserve to the Capital Receipts Reserve.

Defining an Operating Lease

A lease is classified as an operating lease if it does not transfer substantially all the risks and rewards arising from ownership of the asset.

Lessor Accounting for an operating lease

Where the council grants an operating lease over property or items of plant or equipment, the asset is retained on the Balance Sheet. Rental income is credited to the relevant service income line or, if the asset is classified as an Investment Property, to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.

Lessee Accounting for operating leases

Rentals paid under operating leases are charged to the service using the asset in the Comprehensive Income and Expenditure Statement.

1.18 FINANCIAL INSTRUMENTS

Financial assets and liabilities are recognised in the Balance Sheet when the authority becomes party to the contractual provisions of the instrument. In the case of a financial asset this is when the authority becomes committed to its purchase, except in the case of trade receivables, which are recognised when the goods or services have been supplied. Financial liabilities are recognised when the cash or goods or services have been received.

Financial Liabilities

Financial liabilities are initially measured at fair value and then carried at amortised cost. Where interest is payable this is charged to the Financing and Investment Income and Expenditure line in

the Comprehensive Income and Expenditure Statement, based on the carrying amount of the liability multiplied by the effective rate of interest for the instrument. The effective interest rate is the rate that exactly discounts estimated future cash payments over the life of the instrument to the amount at which it was originally recognised. Transaction costs are charged to the surplus or deficit on the provision of services in the Comprehensive Income and Expenditure Statement, unless deemed material, in which case they are added to the initial cost.

Normally this means, for the council's borrowings, the amount recognised in the Balance Sheet represents the outstanding principal repayable plus any accrued interest, and interest charged to the Comprehensive Income and Expenditure Statement is the amount payable for the year stated in the loan agreement. For current payables with no stated interest rate the amount recognised is the outstanding invoiced amount.

Gains and losses on the early settlement of borrowing are credited or charged to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement in the year of settlement. However, where settlement has taken place as part of a restructuring of the loan portfolio that involves the modification or exchange of existing instruments, the premium or discount is deducted from or added to the amortised cost of the new or modified loan and its write-down to the Comprehensive Income and Expenditure Statement is spread over the life of the loan by an adjustment to the effective interest rate.

Where premiums and discounts have been charged to the Comprehensive Income and Expenditure Statement, regulations allow the impact on the General Fund Balance to be spread over a number of years. The council has a policy of spreading the gain or loss over the term that was remaining on the loan against which the premium was payable or discount receivable when it was repaid, subject to the maximum or minimum number of years specified in the regulations. The reconciliation of amounts charged to the Comprehensive Income and Expenditure Statement to the net charge required against the General Fund Balance is managed by a transfer to or from the Financial Instruments Adjustment Account in the Movement in Reserves Statement.

Financial Assets

Under IFRS 9 the authority's financial assets are classified into three types:

- Financial assets at amortised cost – where payments consist solely of principal and interest and the reason for holding is to collect cash flows
- Fair value through Other Comprehensive Income (OCI) – where payments do not consist solely of principal and interest but where the authority has designated the instrument as Fair value through OCI
- Fair value through Profit and Loss (P&L) - where payments do not consist solely of principal and interest.

Financial assets at amortised cost

These are initially measured at fair value and carried at amortised cost. Where interest is receivable this is credited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement, based on the carrying amount of the asset multiplied by the effective rate of interest for the instrument. Normally this means, for the council's loans and investments, the amount recognised in the Balance Sheet is the outstanding principal receivable plus any accrued interest, and interest credited to the Comprehensive Income and Expenditure Statement is the amount receivable for the year stated in the loan agreement.

Interest attributable to the Housing Revenue Account (HRA) is calculated based on the level of its usable reserves held throughout the year and the weighted average (consolidated) rate of interest

earned by the council, in accordance with statutory provisions.

Deposits, bonds and loans are assessed on recognition for impairment due to the likelihood that payments due under the contract will not be made and, if material, a provision for twelve month expected credit losses set aside from the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement. If the risk of default increases significantly after initial recognition and for trade and lease receivables a provision is set aside based on expected lifetime credit losses, if deemed significant or material.

For current receivables with no stated interest rate the amount recognised is the outstanding invoiced amount, less any allowance for impairment (provision for bad or doubtful debts).

Any gains and losses that arise on the disposal or de-recognition of the asset are credited or charged to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.

Fair value through OCI

These are initially measured at cost (equivalent to fair value) and carried at fair value. For instruments quoted in an active market, fair values are based on their market prices at the reporting date, except where the instruments will mature within twelve months of that date, in which case they are assumed not materially different to (and therefore equal to) their carrying values.

Interest receivable is credited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement, based on the amortised cost of the asset multiplied by the effective rate of interest for the instrument. Dividends from equity instruments designated by the authority as Fair value through OCI are credited to the same line when they become receivable by the council.

Changes in fair value are balanced by an entry to the Financial Instruments Revaluation Reserve (FIRR) (formerly the Available-for-Sale Reserve), with the gain or loss being recognised in Other Comprehensive Income and Expenditure in the Comprehensive Income and Expenditure Statement.

Any gains or losses held in the FIRR on de-recognition of the asset are credited or charged to the General Fund Balance via the Movement in Reserves Statement.

Fair value through P&L

These are initially measured at cost and carried at fair value. For instruments quoted in an active market, fair values are based on their market prices at the reporting date, except where the instruments will mature within twelve months of that date, in which case they are assumed not materially different to (and therefore equal to) their carrying values.

Dividends are credited to the Financing and Investment Income and expenditure line in the Comprehensive Income and Expenditure Statement (CIES) when they become receivable by the council. Changes in fair value and any gains or losses on de-recognition are charged or credited to the same line in the CIES and, in the case of pooled investment funds reversed to the Pooled Investment Funds Adjustment Account via the Movement in Reserves Statement (MIRS). Sale proceeds on de-recognition are credited to usable capital receipts via the MIRS.

1.19 FAIR VALUE MEASUREMENT

The authority measures certain non-financial assets (Surplus Assets, Investment Property and Assets Held for Sale) and its Fair value through OCI and Fair value through P&L financial assets

at fair value at the balance sheet date, unless there is no material difference between carrying value and fair value.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement assumes that the transaction to sell the asset or transfer the liability takes place either:

- in the principal market for the asset or liability, or
- in the absence of a principal market, in the most advantageous market for the asset or liability.

The fair value of an asset or liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their best economic interest. In the case of a non-financial asset, the authority takes into account the market participants' ability to use the asset in its 'highest and best use' or by selling it to another market participant that would use the asset in its 'highest and best use'.

Inputs to the valuation techniques used in measuring fair value are categorised within the fair value hierarchy as follows:

- Level 1 - unadjusted quoted prices in active markets for identical assets or liabilities
- Level 2 - directly or indirectly observable inputs other than quoted prices
- Level 3 - unobservable inputs for the asset or liability.

1.20 INVENTORIES

Inventories held in stores are included in the Balance Sheet at the latest price paid. This is a departure from the requirements of the Code, which require inventories to be shown at the lower of cost and net realisable value. The effect of the different treatment is not considered material.

1.21 CASH AND CASH EQUIVALENTS

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are investments that mature in no more than three months or less from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

In the Cash Flow Statement, cash and cash equivalents are shown net of bank overdrafts that are repayable on demand and form an integral part of the council's cash management.

1.22 PROVISIONS

Provisions are made where an event has taken place that gives the council an obligation that probably requires settlement by a transfer of economic benefits, but where the timing or amount of the transfer is uncertain. For instance, the council may be involved in a court case that could eventually result in the making of a settlement or the payment of compensation.

Provisions are charged as an expense to the appropriate service line in the Comprehensive Income and Expenditure Statement when the council becomes aware of the event, based on its best estimate of the likely settlement. When payments are eventually made, they are charged to the provision carried on the Balance Sheet. Estimated settlements are reviewed at the end of each financial year. Where it becomes more likely than not that a transfer of economic benefits will not be required (or a lower settlement than anticipated is made), the provision is reversed and credited back to the relevant service line in the Comprehensive Income and Expenditure Statement.

Where some or all of the payment required to settle a provision is expected to be met by another party (e.g. from an insurance claim), this is only recognised as income in the relevant service revenue account if it is virtually certain that reimbursement will be received if the obligation is settled.

1.23 CONTINGENT LIABILITIES

A contingent liability arises where an event has taken place that gives the council a possible obligation whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the council. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources will be required or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not recognised in the Balance Sheet but, where material, disclosed in a note to the accounts.

1.24 RESERVES

The council sets aside specific amounts as usable reserves for future policy purposes or to cover contingencies. Reserves are created by appropriating amounts from the General Fund balance in the Movement in Reserves Statement. When expenditure to be financed from a reserve is incurred, it is charged to the appropriate service revenue account in that year to form part of the Surplus or Deficit in the Comprehensive Income and Expenditure Statement. The reserve is then appropriated back into the General Fund Balance in the Movement in Reserves Statement so that there is no net charge against council tax for the expenditure in that year.

Certain reserves are kept to manage the accounting processes for non-current assets, financial instruments, retirement and employee benefits, and they do not represent usable resources for the council – these reserves are known as unusable reserves.

1.25 CONTINGENT ASSETS

A contingent asset arises where an event has taken place that gives the council a possible asset whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the council.

Contingent assets are not recognised in the Balance Sheet but, where material, disclosed in a note to the accounts where it is probable that there will be an inflow of economic benefits or service potential.

1.26 PRIOR PERIOD ADJUSTMENTS, CHANGES IN ACCOUNTING POLICIES AND ESTIMATES AND ERRORS

Prior period adjustments may arise as a result of a change in accounting policies or to correct a material error. Changes in accounting estimates are accounted for prospectively, i.e. in the current and future years affected by the change and do not give rise to a prior period adjustment.

Changes in accounting policies are only made when required by proper accounting practices or the change provides more reliable or relevant information about the effect of transactions, other events and conditions on the council's financial position or financial performance. Where a change made has a material effect, it is applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for the prior period as if the new policy had

always been applied.

Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period.

1.27 EVENTS AFTER THE BALANCE SHEET DATE

Events after the Balance Sheet date are those events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the Statement of Accounts is authorised for issue. Two types of events can be identified:

- those that provide evidence of conditions that arose after the reporting period – the Statement of Accounts is adjusted to reflect such events
- those that are indicative of conditions that arose after the reporting period – the Statement of Accounts is not adjusted to reflect such events, but where a category of events would have a material effect, disclosure is made in the notes of the nature of the events and their estimated financial effect.

Events taking place after the date of authorisation for issue are not reflected in the Statement of Accounts.

1.28 ESTIMATION TECHNIQUES

Estimation techniques are the methods adopted to assess the values of assets, liabilities, gains and losses and changes in reserves in situations where there is uncertainty as to their precise value. Unless specified in the Code or in legislative requirements, the method of estimation will generally be the one that most closely reflects the economic reality of the transaction.

1.29 JOINTLY CONTROLLED OPERATIONS

Jointly controlled operations are activities undertaken by the council, together with other organisations, involving the shared use of the assets and resources of the organisations, rather than the establishment of a separate entity. The council recognises on its Balance Sheet the assets that it controls and the liabilities that it incurs and charges or credits the Comprehensive Income and Expenditure Statement with the expenditure it incurs and the share of income it earns from the activity of the operation.

Such operations, not being separate entities, are accounted for in the council only accounts and are not separate entities for Group Account purposes.

1.30 INTERESTS IN COMPANIES AND OTHER ENTITIES – GROUP ACCOUNTS

The council has material interests in companies that have the nature of being subsidiaries and joint ventures and require it to prepare Group Accounts. In the council's own single-entity accounts the interests in companies and other entities are recorded as financial assets at cost (if any), less any provision for losses.

Basis of Consolidation

The group accounts bring together the council's own accounts with those of Gloucestershire Airport Limited (GAL), in which the council has a 50% shareholding, and Cheltenham Borough Homes Limited (CBH), a company limited by guarantee in which the council is the sole member. The accounts of CBH include those of Cheltenham Borough Homes Services Limited (CBHSL), a wholly owned subsidiary of Cheltenham Borough Homes Limited.

GAL has been treated as a Joint Venture since it is jointly owned and controlled with Gloucester City Council. GAL has therefore been consolidated with the council's accounts on an equity accounting basis, in which the council's share of the company's operating results and net assets or liabilities (based on its proportionate shareholding) are shown as separate lines in the main group statements. There is no requirement to adjust for inter-organisation transactions and balances.

CBH has been treated as a Subsidiary (since it is wholly controlled by the council), so its accounts have been consolidated in the main group statements on a line-by-line basis, eliminating inter-organisation transactions and balances.

At 31st March 2019 the council also had a 14.29% shareholding in Ubico Limited, a local authority owned company which has seven members, providing environmental services to the shareholder councils. Since the council does not have control or significant influence over the company, its accounts are not consolidated into the group accounts, however full disclosure notes are provided.

The council also has an interest in Publica Group (Support) Limited, a Joint Venture company limited by guarantee, in which the council is one of four members. The council's share of the company's profit for the year and net assets at the balance sheet date have not been consolidated into the Group Accounts on the basis of immateriality.

The council also has an interest in the South West Audit Partnership Limited (SWAP), a company limited by guarantee. As the council does not have any controlling or significant influence in the company it is classed as an investment, and is not included in the Group Accounts.

Accounting Policies

The financial statements in the group accounts are prepared in accordance with the policies set out above, with the following additions and exceptions:

Cheltenham Borough Homes Limited (CBH)

The financial statements for CBH have been prepared under the historical cost convention in accordance with UK Generally Accepted Accounting Practice (UK GAAP), including Financial Reporting Standard 102 (FRS102) and the Housing SORP 2014: Statement of Recommended Practice for Registered Social Housing providers.

Consequently dwellings owned by CBH are initially valued at historic cost. For the purposes of the group accounts they have been re-valued at Current value to bring them into line with the council's accounting policies, using the existing use value for social housing (EUV-SH) appropriate to the dwellings' tenure as affordable homes. Any revaluation gains or losses are treated as described in paragraph 1.10 (Measurement).

In the company accounts capital grants are written off to the Income and Expenditure account over the estimated life of the asset in line with depreciation. However in the group accounts such grants are treated in accordance with paragraph 1.4, whereby they are credited to the Income and Expenditure account when any conditions attaching to the grant are met.

Gloucestershire Airport Limited

The financial statements of the Airport have been prepared under the historic cost convention (except for certain items that are shown at fair value) in accordance with Financial Reporting Standard 102 (FRS102).

Since Investment Property and Property, Plant and Equipment (PPE) assets held by the airport have been valued at fair value no adjustments are required to the value of non-current assets on consolidation with the council's accounts. Unlike in the airport accounts, however, where any gains in value over historic cost are credited to the Profit & Loss Account, such gains are credited in the group accounts to the Revaluation Reserve (for PPE assets) and the Capital Adjustment Account via the Group Income and Expenditure Statement (for Investment Property), in line with the council's accounting policies.

2. CHANGES IN ACCOUNTING POLICY AND ACCOUNTING STANDARDS THAT HAVE BEEN ISSUED BUT HAVE NOT YET BEEN ADOPTED

The Code requires changes in accounting policy to be applied retrospectively unless alternative transitional arrangements are specified. There is also the requirement for an authority to disclose information relating to the impact of an accounting change that will be required by a new standard that has been issued but not yet adopted.

The following standards and amendments are introduced in the 2021/22 Code:

- IFRS 16 Leases

IFRS 16 is not anticipated to have a material effect on the financial statements or balances of the council since the changes mainly affect the recognition of leases by lessees and the authority does not have any material finance or operating lease liabilities as lessee.

3. CRITICAL JUDGEMENTS USED IN APPLYING ACCOUNTING POLICIES

In applying the accounting policies set out on pages 21-40, the council has had to make certain judgements about complex transactions or those which may be uncertain depending on future events.

Leases

Leases have been classified in accordance with the IFRS criteria. In making these assessments the council has deemed all existing lessor leases (with the exception of the leases of vehicles and plant to Ubico Limited) as being operating leases.

The leases of vehicles and plant to Ubico have been classified as finance leases. Ubico pay a market-rate for the use of the vehicles and are responsible for insuring and maintaining the vehicles/plant and determining their deployment (including use across other Ubico contracts where necessary). The company pays for new vehicles/plant over periods of 3 - 8 years, according to the estimated useful economic life of the assets. The leases have been treated as finance leases since i) the sum of the lease payments is equal the cost of purchasing the assets; ii) the length of the term represents 'substantially all' of the useful life of the assets; and iii) the rights and responsibilities of ownership of the assets (maintenance, insurance, deployment) sit with the company.

Business Rate Appeals Provision

The Local Government Finance Act 2012 introduced a business rates retention scheme that enables local authorities to retain a proportion of the business rates generated in their area. The new arrangements for the retention of business rates came into effect on 1st April 2013. From this date district councils such as Cheltenham assume a share of the liability for refunding ratepayers as a result of successful appeals and other reductions made by the Valuation Office in the rateable values on the rating list. A successful appeal or other reduction may mean the council having to refund rates paid in previous years. The council has therefore set aside a provision to cover its share of the repayments it estimates will be made and made a judgement as to the timescale over which they are likely to be repaid.

The provision is based on the expected success rate of appeals lodged at the year end, together with an estimated reduction in the rating list, based on historical experience.

Group Accounts

In assessing the need for group accounts the council has had to make judgements to establish the boundaries of the group (deciding which organisations over which it has or does not have a controlling or significant interest), and judgements as to the classification of group entities (as subsidiaries, associates or joint ventures). Further details are given in the Group Accounts section.

The council jointly owns (with West Oxfordshire District Council, Cotswold District Council and Forest of Dean District council) Publica Group (Support) Limited, a company limited by guarantee, operating with

Mutual Trading Status to deliver services on behalf of the council and services to other members councils under contract. Whilst the council has an interest in the company, its share of the company's profit for the year and net assets at the balance sheet date have not been consolidated into the council's Group Accounts on the basis of immateriality.

In addition the company is considered to be an employment vehicle, employing and paying staff and then recharging these costs back to the councils. It does not trade and does not make a profit, with any surpluses generated being redistributed back to the councils. Each council has retained its governance arrangements and member control over decisions. Publica are unable to make financial decisions that will have an impact on the Medium Term Financial Strategy of the councils, without proper approval having been given by each council in accordance with the council's constitution and financial and contract rules.

4. ASSUMPTIONS MADE ABOUT THE FUTURE AND OTHER MAJOR SOURCES OF ESTIMATION UNCERTAINTY

The Statement of Accounts contains estimated figures that are based on assumptions made by the council about the future or that are otherwise uncertain. Estimates are made taking into account historical experience, current trends and other relevant factors. However, because balances cannot be determined with certainty, actual results could be materially different from the assumptions and estimates.

The items on the council's Balance Sheet at 31st March 2020 for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Item	Uncertainties	Effect if actual results differ from assumptions
Non-Current Assets carried at existing use and fair value, Council Dwellings, Investment Property and financial assets carried at fair value – material valuation uncertainty due to the Covid-19 Pandemic from March 2020	The Covid-19 pandemic and lockdown arrangements in place since March 2020 have had a significant impact on daily life and the global and UK economies. This could affect the carrying values of assets carried at existing use and fair value in significantly challenging the assumptions used in their valuation. Consequently the valuations undertaken in 2019/20 have been reported 'as subject to material valuation uncertainty'. This means that less certainty can be attached to these valuations than would otherwise be the case.	The impact of the continuing uncertainties on the carrying value of these assets cannot be assessed at this stage as it depends on the extent and duration of the measures introduced and their effect on the wider economy in the long term, and there is currently insufficient evidence available to assess this. However, although any reduction in carrying values would reduce the council's 'net worth', in themselves they would have no impact on the authority's revenue account and ability to deliver services, since they are chargeable to unusable reserves and not the surplus or deficit on the provision of services.
Property, Plant and Equipment	Assets are depreciated over useful lives that are dependent on assumptions about the level of repairs and maintenance that will be incurred in relation to individual assets. The current economic climate makes it uncertain that the council will be able to sustain its current spending on repairs and maintenance, bringing into doubt the useful lives assigned to assets.	If the useful life of assets is reduced, depreciation increases and the carrying amount of assets falls. It is estimated that the annual depreciation charge for buildings (including council dwellings), vehicles, plant and equipment, Infrastructure and surplus assets would increase by £0.216 million for every year that useful lives had to be reduced.

Item	Uncertainties	Effect if actual results differ from assumptions
Fair Value measurements	<p>When the fair values of assets and liabilities cannot be measured based on quoted prices (level 1 inputs) they are measured using valuation techniques. Where possible the inputs to these techniques are based on observable data (level 2 inputs), but where this not possible judgement is required to establish fair values based on unobservable (level 3) inputs. Changes in the assumptions informing such judgements could affect the fair values given.</p> <p>Where level 1 inputs are not available the authority employs relevant experts to identify the most appropriate valuation techniques used.</p>	<p>Unobservable inputs used in the fair value measurements include management assumptions regarding rent growth and discount rates.</p> <p>Significant changes in any of the unobservable inputs would result in lower or higher fair value measurements for some of the Investment properties and Financial Instruments carried at fair value.</p>
Pensions Liability	<p>Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of consulting actuaries is engaged to provide the council with expert advice about the assumptions to be applied.</p> <p>In addition, the valuation of Gloucestershire Pension fund's property assets is subject to material valuation uncertainty due to the Covid-19 pandemic. This means that less certainty can be attached to these valuations than would otherwise be the case. A corresponding material uncertainty is disclosed in the Council's financial statement as the Council's share of property funds is material.</p>	<p>The effects on the net pensions' liability of changes in individual assumptions can be measured. For example, a 0.5% decrease in the discount rate assumption would result in an increase in the pension liability of approximately 8% (£4.1m), and a one year increase in member life expectancy would increase the pension liability by approximately 3% to 5% (£1.5m – £2.6m). A sensitivity analysis is included in note 34 on Pensions.</p> <p>The impact of the continuing uncertainties on the carrying value of these assets cannot be assessed at this stage as it depends on the extent and duration of the measures introduced and their effect on the wider economy in the long term, and there is currently insufficient evidence available to assess this.</p>
Non-domestic rates (NDR) appeals provision	<p>This provision has been set up to meet losses arising from the successful appeal of businesses against the rateable value of their properties and other rateable value reductions. The provision is based on an expected success rate of appeals submitted at 31st March and on an estimated reduction in rateable value. Although based on past experience, both the actual success rate and actual reduction may differ from the estimate.</p>	<p>For appeals relating to charges up to 31st March 2017 a 1% increase in the assumed success rate, together with a 1% reduction in the rates payable, would result in an increase in the estimated provision required of £175,000, of which the council's share would be £70,000 (based on 2019/20 shares). This would reduce any collection fund surplus able to be distributed to the council in future years.</p> <p>In addition, for appeals and other rateable value reductions relating to charges from 1st April 2017, a 1% increase in the estimated rateable value reduction would result in an</p>

Item	Uncertainties	Effect if actual results differ from assumptions
		<p>increase in the estimated provision required of £1,334,300, of which the council's share would be £533,720 (based on 2019/20 shares).</p> <p>The provision required is therefore sensitive to small changes in the reductions awarded and any under-provision could have significant impact on the council's income.</p>

5. ADJUSTMENTS BETWEEN ACCOUNTING AND FUNDING BASIS UNDER THE REGULATIONS

This note details the adjustments that have been made to Total Comprehensive Income and Expenditure so that it equals the resources which, under statutory provisions, are available to meet future capital and revenue expenditure. The following describes the major reserves and the adjustments made to each reserve:

General Fund Balance

The General Fund is the statutory fund into which all the receipts of an council are required to be paid and out of which all liabilities of the council are to be met, except to the extent that statutory rules might provide otherwise. These rules also specify the financial year in which liabilities and payments should impact on the General Fund Balance, which is not necessarily in accordance with proper accounting practice. The General Fund Balance therefore summarises the resources that the council is statutorily empowered to spend on its services or on capital investment (or the deficit of resources that the council is required to recover) at the end of the financial year.

Housing Revenue Account (HRA) Balance

The HRA Balance reflects the council's statutory obligation to maintain a separate revenue account for local authority council housing in accordance with Part VI of the Local Government and Housing Act 1989.

It contains the balance of income and expenditure as defined by the 1989 Act that is available to fund future expenditure in connection with the council's landlord function.

Capital Receipts Reserve

The Capital Receipts Reserve holds the proceeds from the disposal of land or other assets which are restricted by statute from being used other than to fund new capital expenditure or to be set aside to finance historical capital expenditure. The balance on the reserve shows the resources that have yet to be applied for these purposes at the year end.

Major Repairs Reserve

The council is required to maintain a Major Repairs Reserve, which is used to finance capital expenditure incurred by the HRA.

Capital Grants Unapplied Reserve

The Capital Grants Unapplied Reserve holds the grants and contributions received towards capital projects for which the council has met the conditions that would otherwise require repayment of the monies, but which have yet to be applied to meet expenditure.

STATEMENT OF ACCOUNTS 2019/20

2018/19 Usable Reserves						2019/20 Usable Reserves				
General Fund Balance £'000	Housing Revenue Account £'000	Capital Receipts Reserve £'000	Major Repairs Reserve £'000	Capital Grants Unapplied £'000		General Fund Balance £'000	Housing Revenue Account £'000	Capital Receipts Reserve £'000	Major Repairs Reserve £'000	Capital Grants Unapplied £'000
					Adjustments to Revenue Resources <i>Amounts by which income and expenditure included in the Comprehensive Income and Expenditure Statement are different from revenue for the year calculated in accordance with statutory requirements</i>					
					Reversal of entries included in the surplus or deficit on the provision of services in relation to capital expenditure (charged or credited to the Capital Adjustment Account)					
(5,148)	(4,747)	-	-	-	- Charges for depreciation, amortisation and impairment of non-current assets	(5,127)	(4,966)	-	-	-
(1,915)	-	-	-	-	- Revaluation losses on, and derecognitions of, Property, Plant and Equipment	(1,490)	(610)	-	-	-
(2,346)	(28)	-	-	-	- Movements in the fair value of Investment properties	(8,517)	-	-	-	-
1,082	244	-	-	(1,082)	- Capital grants and contributions	297	675	-	-	(297)
(453)	-	-	-	-	- Revenue Expenditure Funded from Capital Under Statute	(415)	-	-	-	-
(155)	(1,306)	-	-	-	- Amounts of non-current assets written off on sale as part of the gain/loss on disposal	(1,605)	(1,107)	-	-	-
33	-	-	-	-	- Donated Assets	-	-	-	-	-
67	-	(67)	-	-	- Capital grants and loans repaid	89	-	(89)	-	-
743	-	-	-	-	- Pension costs transferred from the Pensions Reserve	362	-	-	-	-
146	-	-	-	-	- Financial instruments transferred from the Financial Instruments Adjustment Account	146	-	-	-	-
(178)	-	-	-	-	- Fair value gains and losses of Pooled Investment Funds	(873)	-	-	-	-
71	-	-	-	-	- Council tax and NNDR net deficit transferred to the Collection Fund Adjustment Account	(228)	-	-	-	-
(2)	-	-	-	-	- Holiday Pay transferred to the Accumulated Absences Account	-	-	-	-	-
(8,055)	(5,837)	(67)	-	(1,082)	Total adjustments to Revenue Resources	(17,361)	(6,008)	(89)	-	(297)
					Adjustments between Revenue and Capital resources					
170	2,849	(3,019)	-	-	- Transfer of non-current asset sale proceeds from revenue to capital receipts	1,621	1,858	(1,875)	-	-
-	(14)	14	-	-	- Administrative costs of non-current asset disposals funded by capital receipts	-	(17)	17	-	-
(397)	-	397	-	-	- Payments to the government housing receipts pool funded by a transfer from capital receipts	(441)	-	441	-	-
-	4,747	-	(4,747)	-	- Transfer of HRA resources from revenue to the Major Repairs Reserve	-	4,936	-	(4,936)	-
1,222	-	243	-	-	- Statutory and voluntary provision for the repayment of debt transferred to the Capital Adjustment Account	1,836	-	397	-	-
610	2,139	-	-	-	- Capital expenditure financed from revenue balances transferred to the Capital Adjustment Account	-	3,370	-	-	-
1,605	9,721	(2,365)	(4,747)	-	Total adjustments between Revenue and Capital Resources	3,016	10,147	(1,020)	(4,936)	-
					Adjustments to Capital resources					
-	-	4,831	-	-	- Use of capital receipts to finance capital expenditure	-	-	3,405	-	-
-	-	-	4,747	-	- Use of the Major Repairs Reserve to finance capital expenditure	-	-	-	4,936	-
-	-	-	-	1,184	- Application of capital grants and contributions to fund capital expenditure	-	-	-	-	615
-	-	(543)	-	-	- Transfer from Deferred Capital Receipts upon receipt of cash	-	-	(631)	-	-
-	-	(246)	-	-	- Capital loans repaid	-	-	(399)	-	-
-	-	4,042	4,747	1,184	Total adjustments to Capital Resources	-	-	2,375	4,936	615
(6,450)	3,884	1,610	-	102	Total adjustments between Accounting and Funding basis under the regulations	(14,345)	4,139	1,266	-	318

6. EVENTS AFTER THE REPORTING PERIOD

This Statement of Accounts was authorised for issue by the Section 151 Officer on 30th November 2020. Events taking place after this date are not reflected in the financial statements or notes. Where events taking place before this date provided information about conditions existing at 31st March 2020, the figures in the financial statements and notes have been adjusted to reflect the impact of this information, where material.

7. TRADING OPERATIONS AND AGENCY SERVICES

Trading operations

The council operates a number of trading activities, the surplus/(deficit) of which is included in the Comprehensive Income and Expenditure Statement. Details are as follows:

	2019/20			2018/19		
	Income	Expenditure	(Surplus) / deficit	Income	Expenditure	(Surplus) / deficit
	£'000	£'000	£'000	£'000	£'000	£'000
Included within Net cost of Services						
Cemetery and Crematorium	(2,063)	1,125	(938)	(1,296)	1,195	(101)
Car Parks	(4,990)	3,329	(1,661)	(4,327)	2,928	(1,399)
Green Waste	(717)	432	(285)	(717)	432	(285)
Total	(7,770)	4,886	(2,884)	(6,340)	4,555	(1,785)

The Cemetery and Crematorium, Car Parking and Green Waste trading operations are included within the cost of services in the Comprehensive Income and Expenditure Statement.

Agency Services

During 2019/20 the council acted as agent to the government in the distribution of Small Business and Retail, Hospitality and Leisure grants to local businesses. The expenditure incurred was £3.905 million, which was fully reimbursed by government grant received in 2020/21.

8. OTHER OPERATING EXPENDITURE

	2019/20 £000	2018/19 £000
Parish Precepts	278	255
Payments to the Government Housing Capital Receipts Pool	441	397
(Gains) / losses on disposal of non-current assets	(750)	(1,545)
Total Other Operating Expenditure	(31)	(893)

9. FINANCING AND INVESTMENT (INCOME) AND EXPENDITURE

	2019/20 £000	2018/19 £000
Interest payable and similar charges	3,945	3,133
Net interest on the net defined benefit liability/(asset)	1,446	1,334
Interest and investment income	(779)	(807)
Fair value changes in financial assets (Pooled Funds)	870	178
Income and expenditure on investment properties and changes in their fair value	4,649	(62)
Net Financing and Investment (Income) and Expenditure	10,131	3,776

10. TAXATION AND NON SPECIFIC GRANT (INCOME) AND EXPENDITURE

	2019/20 £000	2018/19 £000
Council Tax	(9,254)	(8,824)
Non -Domestic Rates (income) and expenditure		
- Billing authority share	(21,994)	(27,179)
- Collection Fund deficit	282	602
- Tariff payable to central government	18,936	23,721
- Levy payable to central government less Pool surplus	394	40
	(2,382)	(2,816)
General government grants	(3,318)	(3,608)
Net gains from donated assets	-	(33)
Capital grants and contributions	(750)	(897)
Net Taxation and Non Specific Grant Income	(15,704)	(16,178)

11. MEMBERS' ALLOWANCES

In 2019/20 the council paid £346,019 (2018/19 £338,595) in allowances to its 40 members. The expenditure reflects members' allowances approved by council for 2019/20. Full details of the Members' Allowances scheme for the year can be found on the council's website.

12. OFFICERS' REMUNERATION

Senior Officers whose salary is equal to or more than £50,000 per annum:

2019/20

Post Title	Salary £	Expenses/ Allowances £	Other payments £	Total remuneration excluding pension contributions £	Pension contributions £	Total Remuneration including pension contributions £
Previous Chief Executive Officer (until November 2019)	58,262	688	3,197	62,147	11,247	73,394
Current Chief Executive Officer (from February 2020)	18,900	-	-	18,900	3,459	22,359
Executive Director, People & Change (note ii)	84,666	1,637	-	86,303	15,086	101,389
Managing Director, Place & Growth	93,430	755	-	94,185	16,680	110,865
Executive Director, Finance and Assets	91,135	1,454	-	92,589	15,816	108,405
TOTAL	346,393	4,534	3,197	354,124	62,288	416,412

2018/19

Post Title	Salary £	Expenses/ Allowances £	Other payments £	Total remuneration excluding pension contributions £	Pension contributions £	Total Remuneration including pension contributions £
Chief Executive Officer (note i)	111,180	397	5,400	116,977	21,334	138,311
Cheltenham Development Task Force Managing Director	95,700	1,110	-	96,810	17,513	114,323
Director, Corporate Resources	66,731	29	-	66,760	12,212	78,972
Executive Director, People & Change (note ii)	36,870	544	-	37,414	6,747	44,161
Managing Director, Place & Growth	87,092	1,040	-	88,132	15,938	104,070
Director, Environment	65,536	32	-	65,568	11,993	77,561
Director, Planning	65,536	191	-	65,727	11,993	77,720
Executive Director, Finance and Assets	93,448	3,107	-	96,555	16,508	113,063
TOTAL	622,093	6,450	5,400	633,943	114,238	748,181

Notes:

- i) 'Other payments' relate to Returning Officer fees paid in respect of elections.

For the purposes of this disclosure 'senior employee' means Chief Executive, their direct reports and statutory chief officers whose salary is between £50,000 and £150,000.

The council does not operate a Performance Pay System and does not pay bonuses to any member of staff.

The position of statutory role of Monitoring Officer for the council is carried out by Ms Sara Freckleton, under a shared arrangement with Tewkesbury Borough Council. This council pays a contribution of 35% of her costs, being £42,394 in 2019/20 (£41,536 in 2018/19).

The number of other employees whose remuneration, excluding employer's pension contributions, was £50,000 or more in bands of £5,000 was:

Remuneration Band	No of Employees 2019/20	No of Employees 2018/19
£50,000 - £54,999	6	4
£55,000 - £59,999	3	-
£60,000 - £64,999	2	-
Total	11	4

13. TERMINATION BENEFITS

The council terminated the contract of two employees in 2019/20 (four in 2017/18). Total costs incurred were £5,330 (£69,900 in 2017/18), of which £2,330 (£3,556 in 2018/19) related to compulsory redundancy costs and £3,000 (£66,344 in 2018/19) related to other departure costs. All staff redundancies were made on a compulsory basis, with no voluntary redundancies. These costs have been charged to the relevant service lines within the Comprehensive Income and Expenditure Statement.

These termination benefits are summarised in the table below:

2019/20		Bands	2018/19	
No. of staff	£		No. of staff	£
2	5,530	£0 - £20,000	2	10,056
-	-	£20,001 - £40,000	2	59,844
2	5,530		4	69,900

14. RELATED PARTY TRANSACTIONS

The council is required to disclose material transactions with related parties, bodies or individuals that have the potential to control or influence the council or to be controlled or influenced by the council. Disclosure of these transactions allows readers to assess the extent to which the council might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with the council. Third Party Declaration forms were issued to chief officers and the Register of Members' Interests was reviewed.

Central Government

The UK Government has effective control over the general operations of the council - it is responsible for providing the statutory framework and legislation within which the council operates, provides a large proportion of its funding in the form of grants and prescribes the terms of many of the transactions that the council has with other parties (e.g. council tax bills, housing benefits). Grants received from government departments are shown in note 16 on page 53.

Members and Officers

Members of the council have direct control over the council's financial and operating policies. The total of members' allowances paid in 2019/20 is shown in note 11 on page 46. No member or officer has declared an interest with any outside commercial organisation. Several members serve officially on bodies that receive major grants from the council.

Assisted organisations

The council provided financial assistance to 70 local bodies and voluntary organisations (70 in 2018/19) totalling £550,524 (£475,989 in 2018/19). It is the council's best value policy to have a Service Level Agreement in place for all grants exceeding £10,000, referred to as Conditional Offers of Grants.

Grants over £35,000 made during 2019/20 are as follows, together with the number of members who are officially appointed to serve on those organisations:

	Cash Grant £	No. of Members With a declared interest
Everyman Theatre	195,050	1
County Community Projects (CCP)	127,500	-
Playhouse Theatre	65,700	1
	388,250	2

The Gloucestershire Everyman Theatre leases the Everyman building from the council. In 2011/12 the council approved a loan of £1 million to the Theatre company to fund restoration costs, of which £0.350 million was outstanding at 31st March 2020.

Other public bodies (subject to common control by central government)

The council collects precepts on behalf of Gloucestershire County Council, the Gloucestershire Police and Crime Commissioner and the Parish Councils within the borough. Precepts for the County and Police and Crime Commissioner are shown in the Collection Fund.

Nine members of the borough council are also members of Gloucestershire County Council. Six members of the borough council are also members of parish councils. Parish Precepts are shown in the Comprehensive Income and Expenditure Statement.

Council employees are eligible to be members of the Local Government Pension Scheme, administered by Gloucestershire County Council. The total employer's contributions to the Pension Fund by the council were £1,217k in respect of 2019/20 (£1,209k in 2018/19).

Companies

Gloucestershire Airport Limited

The council has a 50% shareholding in Gloucestershire Airport Limited. The airport's accounts have been consolidated into the Group Accounts. One member serves on the airport's Board of Directors.

The airport purchased goods and services from the council totalling £23,684 during 2019/20 (£35,117 in 2018/19). At 31st March 2020 £8,000 was owed by the Airport to the council (£8,000 at 31st March 2019) in respect of these goods and services. During 2011/12 the council loaned £1.190 million to the airport towards the cost of the runway safety project, of which £0.388 million was outstanding at 31st March 2020. In addition the council provided the company with a temporary overdraft facility during 2019/20 of £0.600 million, which remains at 31st March 2020.

Cheltenham Borough Homes Limited (CBH)

The council wholly owns an Arm's Length Management Organisation (Cheltenham Borough Homes Limited), which is limited by guarantee. The accounts for this company have been consolidated into the Group Accounts. Two councillors serve on the company's Board of Directors.

The council procured supplies and services totalling £12,914,230 from CBH during 2019/20 (£11,848,000 in 2018/19), £1,139,784 (£1,882,000 in 2018/19) of which is included as short term creditors in the council's balance sheet at the year end. CBH procured supplies and services from the council totalling £468,702 during 2019/20 (£585,000 in 2018/19), £420,284 (£188,000 in 2018/19) of which is included in short term debtors in the council's balance sheet at the year end

In 2011/12 the council loaned CBH £1.4 million for housing development at St Paul's and Brighton Road. A further £2 million was loaned in 2012/13, £1.4 million in 2014/15 and £2.2 million in 2015/16. The outstanding loans totalled £6.415 million at 31st March 2020.

Ubico Limited

Ubico Limited was set up on 1st April 2012 to deliver environmental services and was initially jointly owned by Cheltenham Borough Council and Cotswold District Council. During 2015 and 2016 Forest of Dean District Council, Tewkesbury Borough Council, West Oxfordshire District Council, Stroud District Council and Gloucestershire County Council joined the company as shareholders. This council holds an equal 1/7th shareholding in the company.

The company provides services to the shareholder councils on a not-for-profit basis and therefore qualifies for the Teckal exemption (named after the EU case that established the principle). As a Teckal company, Ubico Limited must ensure that the percentage of work undertaken outside of the shareholder contracts is less than 20% of its total activity.

Whilst one director of the council serves on Ubico's Board of Directors, the council is not deemed to have significant influence over the company. The separate operating practices, management structure and majority-voting on the Ubico board do not constitute any means of joint-control over the company. The council's interest is therefore classed as an investment, and the company is not included in the Group Accounts.

The council procured supplies and services totalling £9,397,026 from Ubico Limited during 2019/20 (£8,763,784 in 2018/19), £46,667 (£451,024 in 2018/19) of which is included in the council's balance sheet as a short term creditor at the year end. The company procured supplies and services from the

council totalling £386,394 during 2019/20 (£531,988 in 2018/19), £641,772 (£137,373 in 2018/19) of which is included in the council's balance sheet within the short term debtor at the year end.

Vehicles and plant used by Ubico to provide environmental services in the borough are initially purchased by the council and then leased to the company in the year of purchase under a finance lease arrangement. At 31st March 2020 the amount owing to the council under these leases totalled £3.92 million (£2.9 million at 31st March 2019).

Publica Group (Support) Limited

Publica Group (Support) Limited is a not-for-profit company limited by guarantee, with no share capital.

The council, along with West Oxfordshire, Forest of Dean and Cotswold District Councils jointly set up the company during 2017/18, with operations commencing on 1st November 2017. The company has Mutual Trading Status to deliver services on behalf of the council and services to other member councils under contract.

The company is a Teckal company, fulfilling the conditions set out in Regulation 12(4) of the Public Contracts Regulations 2015. The company is subject to management supervision by the Members. As such, the company is a body governed by public law as defined in the Public Contracts Regulations 2015.

Whilst Publica Group (Support) Limited works closely with the council, the company has its own board of Directors, its own management team, and operates independently from the council.

During 2019/20 the council purchased services from Publica Group (Support) Limited to the value of 1,683k (£1,940k in 2018/19) and the company generated a surplus in the year of £16,124 (£91,274 in 2018/19). Whilst the council is a significant partner in the company, its share of Publica's net assets of £120,932 have not been consolidated in the council's Group Accounts as they are not deemed material.

South West Audit Partnership Limited (SWAP)

The council is a member of SWAP which is a company limited by guarantee, wholly owned and controlled as an in-house company by its members. It is a local authority controlled company for the purposes of Part V of the Local Government and Housing Act 1989. The liability of each member is limited to £1, being the amount that each member undertakes to contribute to the assets of the company in the event of it being wound up whilst a member or within one year after ceasing to be a member. As the council does not have any controlling or significant influence in the company it is not included in the Group Accounts.

Officers

Chief Finance Officer (CFO)

During the period 2012/12 to 2018/19, Cheltenham Borough Council seconded the Executive Director Finance and Assets to Forest of Dean District Council in the capacity of Chief Finance Officer, under a secondment agreement. The CFO is an employee of, and paid by, this council. Whilst the officer was shared and has influence in both councils, he was required to act separately for each council. Decisions on overall policy and the strategic direction are set by Cabinet and Council in each authority, with the CFO enacting council members' will.

This arrangement ceased in 2019/20, with both councils now employing their own full time Chief Finance Officer direct.

Monitoring Officer (MO)

Cheltenham Borough Council shares its Monitoring Officer with Tewkesbury Borough Council. The MO is an employee of, and paid by, Tewkesbury Borough Council. Whilst the officer is shared and has influence in both councils, she is required to act separately for each council.

15. EXTERNAL AUDIT COSTS

	2019/20 £	2018/19 Restated** £
Fees payable to the External Auditor with regard to external audit services carried out by the appointed auditor	45,543	38,043
Fees paid to the External Auditor for the certification of grant claims and returns	19,906	19,906
Additional fee for audit expert on Investments	4,000	
Public Sector Audit Appointments – external audit fees refund	-	(4,600)**
Other work provided by the appointed auditor:-		
Audit of Pooled Capital Housing receipts	3,500	2,100
IIP Accreditation professional review	-	-
CFO Insights Licence *	-	3,750
	72,949	59,199

* CFO Insight licence - council share of costs of service provided to Publica clients

**Restated to include later agreed refund

16. GRANT INCOME

The council credited the following grants and contributions to the Comprehensive Income and Expenditure Statement:

	2019/20 £'000	2018/19 Restated* £'000
Credited to Other Income and Expenditure		
New Homes Bonus	(1,469)	(1,755)
Section 31 Business Rates compensation grants	(1,792)	(1,716)
Capital Grants and Contributions	(750)	(897)
Other grants and contributions	(141)	(138)
	(4,152)	(4,506)
Credited to Services		
Housing Benefits subsidy & administration grants	(22,060)	(24,925)
Council Tax Benefit administration grants	(108)	(112)
Capital grants and contributions	(410)	(434)
Other Grants	(498)	(448)
Partnership funding and contributions	(1,591)	(1,097)
	(24,667)	(27,016)
Total	(28,819)	(31,522)
*The format of the note has been restated		

The council has received a number of grants and contributions that have yet to be recognised as income as they have conditions attached to them which have yet to be met. The balances at the year-end are as follows:

	2019/20 Current £'000	2019/20 Long Term £'000	2018/19 Current £000	2018/19 Long Term £000
Receipts in Advance – Revenue				
Commuted Grounds Maintenance contributions	-	(95)	-	(95)
NNDR compensation (rate reliefs) 2020/21	(1,813)	-	-	-
Flood Relief	(368)	-	-	-
Homelessness	(277)	-	-	-
Other grants and contributions	(202)	(180)	-	(180)
	(2,660)	(275)	-	(275)
Receipts in Advance – Capital				
Affordable housing contributions	(253)	(225)	(253)	(512)
Homes England Grant	(1,888)	-	-	-
Other grants and contributions	(146)	-	(223)	-
	(2,287)	(225)	(476)	(512)

17. SEGMENTAL REPORTING

EXPENDITURE & FUNDING ANALYSIS

The objective of the Expenditure and funding Analysis is to demonstrate to council tax and rent payers how the funding available to the authority (government grants, rents, council tax and business rates) for the year has been used in providing services in comparison with those resources consumed or earned by authorities in accordance with generally accepted accounting practices. The Expenditure and Funding Analysis also shows how this expenditure is allocated for decision making purposes between the council's services. Income and Expenditure accounted for under generally accepted accounting practices is presented more fully in the Comprehensive Income and Expenditure Statement.

2018/19			2019/20		
Net expenditure chargeable to the General Fund and HRA balances £'000	Adjustments between the funding and accounting basis (note below) £'000	Net expenditure in the Comprehensive Income and Expenditure statement £'000	Net expenditure chargeable to the General Fund and HRA balances £'000	Adjustments between the funding and accounting basis (note below) £'000	Net expenditure in the Comprehensive Income and Expenditure statement £'000
1,229	73	1,302	1,469	146	1,615
8,853	(3,080)	5,773	9,422	(1,754)	7,668
3,867	298	4,165	4,263	375	4,638
7,674	2,505	10,179	7,085	1,019	8,104
(3,892)	28	(3,864)	(3,226)	610	(2,616)
17,731	(176)	17,555	19,013	396	19,409
(16,037)	2,742	(13,295)	(15,414)	9,810	(5,604)
1,694	2,566	4,260	3,599	10,206	13,805
(18,131)		Opening General Fund and HRA balance including earmarked reserves at 1 April	(16,437)		
1,694		Add (Surplus) / deficit in year	3,599		
(16,437)		Closing General Fund and HRA balance including earmarked reserves at 31 March**	(12,838)		

** for a split of the balance between the General Fund, HRA and earmarked reserves see the Movement in Reserves Statement

STATEMENT OF ACCOUNTS 2019/20

NOTE TO THE EXPENDITURE AND FUNDING ANALYSIS

2018/19				Adjustments from General Fund to arrive at the Comprehensive Income and Expenditure Statement amounts	2019/20			
Adjustments for capital purposes (note 1 below)	Net changes for the Pension Adjustments (note 2 below)	Other Differences (note 3 below)	Total Adjustments		Adjustments for capital purposes (note 1 below)	Net changes for the Pension Adjustments (note 2 below)	Other Differences (note 3 below)	Total Adjustments
£'000	£'000	£'000	£'000		£'000	£'000	£'000	£'000
-	71	2	73	Chief Executive	-	146		146
-	(3,080)	-	(3,080)	Finance and Assets Directorate	1,490	(3,244)	-	(1,754)
-	298	-	298	People and Change Directorate	-	375	-	375
1,871	634	-	2,505	Place and Growth Directorate	104	915	-	1,019
28	-	-	28	Housing Revenue Account (HRA)	610	-	-	610
1,899	(2,077)	2	(176)	Net Cost of Services	2,204	(1,808)	-	396
1,446	1,334	(38)	2,742	Other Income and Expenditure from the Funding Analysis	7,409	1,446	955	9,810
3,345	(743)	(36)	2,566	Difference between General Fund surplus or deficit and Comprehensive Income and Expenditure Statement surplus or deficit	9,613	(362)	955	10,206

Notes

(1) **Adjustments for capital purposes** – this column adds in revaluation gains/losses on Property, Plant and Equipment, capital grants repaid and Revenue Expenditure Funded from Capital under Statute (REFCUS) in the service lines and for:

- Other Operating Expenditure – adds gains/losses on disposals of Property, Plant and Equipment and capital receipts paid to the housing pool
- Financing and Investment Income and Expenditure – the statutory charges for capital financing (Minimum and Voluntary Revenue Provision) and revenue financing of capital expenditure are deducted as these are not chargeable under generally accepted practices, and changes in the fair value of Investment properties are added
- Taxation and Non-specific Grant Income and Expenditure – this line is credited with capital grants and donations receivable in the year which have no conditions or for which conditions were satisfied in the year.

Depreciation and amortisation charges are included in the service lines in the Net Expenditure chargeable to the General Fund and HRA balances column of the Expenditure and Funding Analysis (as they are included in reports to management), but then (in the case of the General Fund) reversed out in Other Income and Expenditure so they have no impact on council tax. The reversal is removed in the Other Income and Expenditure line in the adjustments for capital purposes column above to ensure such charges are included in the surplus or deficit on the provision of services in the Comprehensive Income and Expenditure Statement.

(2) Net change for the Pensions Adjustments

- for services - the removal of employer pension contributions and their replacement with current and past service costs
- for Financing and Investment Income and Expenditure – the addition of net interest on the pensions defined benefit liability.

(3) Other Differences

- for Financing and Investment Income and Expenditure – adjustments to the general fund for timing differences in premiums and discounts on financial instruments and for changes in the fair value of pooled investment funds
- for Taxation and Non-specific Grant income and Expenditure – timing differences between the income for council tax and non-domestic rates (NDR) credited under statutory regulations and that recognised under generally accepted accounting practice.

SEGMENTAL INCOME AND EXPENDITURE

The net expenditure chargeable to the general fund and HRA balances in the Expenditure and Funding Analysis includes the following items on a segmental basis:-

	2019/20		2018/19	
	Depreciation, amortisation and impairment £'000	Revenues from external customers* £'000	Depreciation, amortisation and impairment £'000	Revenues from external customers* £'000
Chief Executive	-	(18)	-	(48)
Finance and Assets Directorate	2,160	(790)	2,137	(1,345)
People and Change Directorate	642	(775)	655	(886)
Place and Growth Directorate	2,325	(12,454)	2,356	(11,488)
Housing Revenue Account (HRA)	4,966	(20,211)	4,749	(20,160)
Total analysed on a segmental basis	10,093	(34,248)	9,897	(33,927)

*Revenues from external customers are included in "Fees, charges & other service income" in note 18 below.

18. EXPENDITURE AND INCOME ANALYSED BY NATURE

	2019/20 £'000	2018/19 Restated* £'000
Expenditure		
Employee benefit expenses	11,512	10,434
Other service expenses	54,838	56,306
Depreciation, amortisation, impairment	10,093	9,897
Losses on revaluation of Property, Plant & Equipment, Investment property and financial assets	12,000	4,623
Interest payments	5,391	4,468
Precepts and levies	19,889	24,613
Payments to Housing Capital Receipts Pool	441	397
Total Expenditure	114,164	110,738
Income		
Fees, charges and other service income	(38,251)	(36,498)
Interest and investment income	(1,292)	(911)
Income from council tax and non-domestic rates	(31,247)	(36,002)
Government grants and contributions	(28,819)	(31,522)
Net gains on disposal of non-current assets	(750)	(1,545)
Total Income	(100,359)	(106,478)
(Surplus) or Deficit on the Provision of Services	13,805	4,260

*Grants and contributions have been restated to include some contributions previously included as other service income

STATEMENT OF ACCOUNTS 2019/20

19. PROPERTY, PLANT & EQUIPMENT

2018/19 Restated*									2019/20							
Council dwellings	Other Land and buildings	Vehicles, Plant and equipment	Infra-structure assets	Community assets	Surplus assets	Assets under construction	Total		Council dwellings	Other Land and buildings	Vehicles, Plant and equipment	Infra-structure assets	Community assets	Surplus assets	Assets under construction	Total
£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
199,033	131,105	5,464	12,438	146	2,992	4,538	355,716	Cost or valuation	209,877	137,152	5,223	14,004	148	5,312	1,251	372,967
7,618	7,811	998	1,419	2	-	1,460	19,308	At 1 April	12,668	97	2,137	218	-	39,600	1,800	56,520
3,415	(2,818)	-	-	-	1,651	-	2,248	Revaluation increases / (decreases) recognised in the Revaluation Reserve	(8,104)	4,960	-	-	-	146	-	(2,998)
-	(1,841)	-	-	-	-	-	(1,841)	Revaluation increases / (decreases) recognised in the surplus / deficit on the provision of services	-	-	-	-	-	(2,100)	-	(2,100)
(1,305)	-	(273)	-	-	-	-	(1,578)	Derecognition - disposals	(1,107)	-	(1,605)	-	-	-	-	(2,712)
-	-	(966)	-	-	-	-	(966)	Derecognition - other	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	- Assets reclassified (to)/from held for resale	-	(60)	-	-	-	-	-	(60)
1,116	2,895	-	147	-	669	(4,747)	80	Other Reclassifications	(41)	-	5	-	-	(551)	529	(58)
209,877	137,152	5,223	14,004	148	5,312	1,251	372,967	At 31 March	213,293	142,149	5,760	14,222	148	42,407	3,580	,559
-	(1,141)	(2,265)	(2,852)	-	(86)	(33)	(6,377)	Accumulated Depreciation and Impairment	(6)	(3,993)	(2,071)	(3,256)	-	(143)	(33)	502
(4,467)	(4,190)	(612)	(404)	-	(57)	-	(9,730)	At 1 April	(4,613)	(4,278)	(475)	(527)	-	(61)	-	(-,954)
4,461	1,172	-	-	-	80	-	5,713	Depreciation charge	4,606	1,273	-	-	-	-	-	5,879
-	86	-	-	-	-	-	86	Depreciation written out to the Revaluation Reserve	-	-	-	-	-	-	-	-
-	-	806	-	-	-	-	806	Depreciation written out to the surplus / deficit on the provision of services	-	-	-	-	-	-	-	-
-	80	-	-	-	(80)	-	-	Derecognition - other	-	-	-	-	-	-	-	-
(6)	(3,993)	(2,071)	(3,256)	-	(143)	(33)	(9,502)	Other Reclassifications	-	-	-	-	-	-	-	-
209,871	133,159	3,152	10,748	148	5,169	1,218	363,465	At 31 March	(13)	(6,998)	(2,546)	(3,783)	-	(204)	(33)	(13,577)
								Net Book Value at 31 March	213,280	135,151	3,214	10,439	148	42,203	3,547	407,982

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* Council dwellings depreciation has been restated to include depreciation on assets not revalued in 2018/19

Depreciation

The following estimated useful lives have been used in the calculation of depreciation:

- Council dwellings – between 10 - 75 years depending on the component, for example 20 years for kitchens, 30 years for bathrooms and windows, 60 years for roofs
- Other Buildings – between 15 - 60 years, depending on the individual building
- Vehicles, Plant, Furniture and Equipment - between 5 - 15 years, depending on the type of asset
- Infrastructure - 40 years for General Fund assets, 25 years for HRA assets.

The individual remaining useful lives of each asset are reviewed annually or on revaluation and amended as necessary.

Revaluations

The council formally re-values its land and buildings on a rolling programme to ensure they are revalued at least every five years, however in accordance with the Code all land and building values are reviewed annually for material changes and re-valued at 31st March if necessary. Valuations have been carried out both internally by the council's property section and externally. Valuations of land and buildings were carried out using the methodologies and bases of estimation set out in the professional standards of the Royal Institution of Chartered Surveyors.

The table below summarises the valuation basis and date of valuation (if applicable):

	Council Dwellings £'000	Other land and buildings £'000	Vehicles, plant, furniture & equipment £'000	Infrastructure assets £'000	Community assets £'000	Surplus assets £'000	Assets under construction £'000	Total £'000
Carried at (depreciated) historical cost	-	-	3,214	10,439	148	-	3,547	17,348
Valued at current value as at 31 st March:								
2016	-	5,783	-	-	-	1,004	-	6,787
2017	-	7,569	-	-	-	1,239	-	8,808
2018	220	84,867	-	-	-	-	-	85,087
2019	-	10,873	-	-	-	1,506	-	12,379
2020	213,060	26,059	-	-	-	38,454	-	277,573
Total cost or valuation	213,280	135,151	3,214	10,439	148	42,203	3,547	407,982

Componentisation

Under the Code the council is required to account separately for significant building components as defined in the council's Componentisation policy. This is to ensure material components are depreciated over their respective useful lives. Components separately identified relate only to council dwellings, where the main ones are roofs, walls, kitchens, bathrooms, electrics, heating, windows/doors, solar panels, and communal lifts and services.

Fair value measurement of Surplus assets

The fair values of surplus assets valued at 31st March 2020 have been based on a market approach using current market conditions, recent sale prices and other relevant information for similar assets in the local area. The level of observable inputs is therefore significant, leading to the properties being categorised at Level 2 in the fair value hierarchy.

20. HERITAGE ASSETS

The council's buildings house most of the authority's heritage assets, held to support the provision of arts and culture in Cheltenham. In addition the council owns a number of statues and monuments located within the town.

The heritage assets housed in the council's buildings comprise the collections either exhibited or stored at the Cheltenham Art Gallery and Museum (The Wilson), the Pittville Pump Room, the Holst Birthplace Museum, the Municipal Offices and the Town Hall. These assets include many items donated by local people.

The four principal collections are:

- Fine Art
- Decorative Arts
- Social History and Ethnography
- Archaeology.

The council does not recognise the archaeological collection on its balance sheet, as obtaining valuations for these would involve a disproportionate cost. This exemption is permitted by the Code and is due to the diverse nature of the assets held, and lack of comparable market values.

The museum holds significant collections in the following areas:

- Fine art: British and foreign paintings, drawing and prints from the 16th century onwards, including English water colours from the 18th century onwards
- Decorative art: British and European ceramics, British furniture, clocks, glass, metalwork and treen from the 16th century onwards
- Oriental art: Chinese ceramics, costume, armour and artefacts from the 9th century to the present day
- Costumes and textiles: garments, underwear and accessories from the 17th century onwards
- The Arts and Crafts Movement: books, ceramics, furniture, metalwork, paintings, textiles, archives, designs and drawings relating to the English Arts and Crafts Movement from the 1860's to the present day, recognised nationally by the government as a Dedicated Collection
- Archaeology: Prehistoric, Romano-British and medieval archaeology
- Local history: printed ephemera, photographs, postcards, topographical prints and objects relating to the history of Cheltenham
- Numismatics: British and foreign coins from the Roman empire to the 21st century
- Firearms and edged weapons: British and European examples
- Natural sciences: geology, herbaria, eggs
- Social history: objects relating to English domestic, personal and working life from the 17th century to the present day.

The museum maintains all its present collections, and where appropriate enhances those collections by building on present strengths and filling gaps by purchase, gift or bequest. The museum does not

undertake disposals motivated by financial reasons. Disposals are only undertaken by the governing body after full consideration of the reasons for disposal. External expert advice is sought, along with the views of stakeholders. Any proceeds are accounted for in accordance with statutory accounting requirements relating to capital receipts.

The collections are managed by curators employed by the Cheltenham Trust, who manage the collections on behalf of the council in accordance with council policy and guidance.

A detailed breakdown of the carrying values of the council's heritage assets are shown below:

	Ceramics	Art Collection	Furniture	Civic Regalia & Silver	Textiles, Ephemera and other collectables	Statues and Monuments	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Valuation							
1 April 2018	2,369	26,273	4,360	213	5,110	1,553	39,878
Additions	-	1	-	-	32	-	33
Revaluations*	34	525	87	4	92	47	789
31 March 2019	2,403	26,799	4,447	217	5,234	1,600	40,700
Revaluations*	-	-	-	-	-	48	48
31 March 2020	2,403	26,799	4,447	217	5,234	1,648	40,748

* includes updates for inflation.

Except for two items professionally revalued during 2016/17 in preparation for their forthcoming loan, all the major works of art were last revalued at 1st April 2010.

21. CAPITAL EXPENDITURE AND FINANCING

The total amount of capital expenditure incurred (investment made) in the year is shown in the table below, together with the resources used to finance it. Where capital expenditure is to be financed in future years by charges to revenue as assets are used by the council, the expenditure results in an increase in the Capital Financing Requirement (CFR), a measure of the capital expenditure financed by borrowing. The CFR is analysed in the second part of the note.

	2019/20 £'000	2018/19 £000
Opening Capital Financing Requirement	135,225	87,401
Capital Investment		
Property, Plant and Equipment (see Additions in note 19 for breakdown)	56,520	19,308
Investment Property	534	43,126
Intangible assets	131	155
Revenue Expenditure Funded from Capital under Statute	415	453
	57,600	63,042
Sources of Finance		
Capital Receipts	(3,801)	(5,073)
Government Grants	(579)	(497)
Capital Contributions	(515)	(275)
Partnership Funding	(196)	(655)
Revenue Financing:		
Minimum Revenue Provision (MRP)	(1,673)	(1,066)
Voluntary Revenue Provision (VRP)	(163)	(156)
Major Repairs Reserve	(4,936)	(4,747)
Revenue	(3,370)	(2,749)
	(15,233)	(15,218)
Closing Capital Financing Requirement	177,592	135,225
Explanation of movement in year		
Increase in underlying need to borrowing (unsupported by Government financial assistance)	44,599	49,289
Minimum and Voluntary Revenue Provision (MRP/VRP)	(1,836)	(1,222)
Capital receipts applied in lieu of MRP	(396)	(243)
Increase (Decrease) in Capital Financing Requirement	42,367	47,824

Commitments under capital contracts

At 31st March 2020 the council was committed to completing the schemes within its capital programme for 2019/20. A total of £Nil had not been spent but was contractually committed at 31st March 2020 (£Nil at 31st March 2019).

22. INVESTMENT PROPERTIES

The following items of income and expenditure relating to Investment Properties have been accounted for in the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement:

	2019/20 £'000	2018/19 £'000
Rental income from Investment Property	(4,087)	(2,486)
Direct operating expenses	219	78

In addition in 2019/20 £0.250 million (£0.239 million in 2018/19) of rental income is included in the Housing Revenue Account (HRA) line.

There are no restrictions on the council's ability to realise the value inherent in its investment property or on its right to the remittance of income and the proceeds of disposal. The council has no contractual obligations to purchase, construct, enhance or develop investment property, however some lease agreements require the council to repair and maintain properties.

The following table summarises the movement in the fair value of investment properties in the year:

	2019/20 £'000	2018/19 £'000
Balance at 1st April	75,993	35,320
Additions – construction	534	43,126
Reclassifications (to) / from Property, Plant and Equipment	58	(80)
Net gains / (losses) for the period included in the surplus or deficit on the provision of services resulting from changes in fair value	(8,517)	(2,373)
Balance at 31st March	68,068	75,993

The fair value of the investment property is reviewed and re-measured annually as necessary at the balance sheet date. All properties (with the exception of shops revalued internally in 2019 and 2020) were revalued in 2019/20 by an external valuer, in accordance with the methodologies and bases of estimation set out in the professional standards of the Royal Institution of Chartered Surveyors.

The valuations have been based where possible on a market approach using current market conditions, recent sale prices and other relevant information for similar assets in the local area. In these cases, where existing rents have been capitalised, the yield has been obtained by using market knowledge and evidence. The level of observable inputs is therefore significant, leading to £52.75 million of the value of the properties at 31st March 2020 being categorised at Level 2 in the fair value hierarchy.

The remaining valuation of £15.3 million has been based on an income approach using a discount rate, which are significant unobservable inputs, so have been categorised at level 3 in the fair value hierarchy. Such valuations are therefore sensitive to significant changes in rental income and in the discount rate used.

In estimating the fair values of the investment properties, the highest and best use of the properties is their current use.

23. ASSETS HELD UNDER LEASES**The council as Lessor*****Finance Leases***

The council's policy is to purchase the vehicles and plant required by Ubico Limited to provide environmental services within Cheltenham and then lease them to the company. The vehicles and plant used on these services at 1st April 2012 were transferred under a finance lease to the company when it commenced operations on that date. The present value of the lease at the date of transfer was £1.364 million. Subsequent purchases of £5.522 million (including £1.605 million in 2019/20) have been subject to further finance leases.

The repayments due under the leases are based on recovering the cost of each vehicle or item of plant over its remaining estimated useful life, together with a finance charge on the amounts outstanding. The council does not anticipate residual values for the items at the end of the leases as they are not considered material, consequently the gross investment in the leases is deemed equal to the present value of the lease payments due. These are due as follows:

	31st March 2020 £'000	31st March 2019 Restated* £'000
Not later than 1 year	802	560
2 – 5 years	2,759	2,076
More than 5 years	360	309
	3,921	2,945

* following a reassessment of vehicle useful lives.

A loss provision for uncollectable amounts has not been provided on the basis the lessee is a wholly owned local authority company.

Operating Leases

The council seeks to obtain income from property it owns but does not need for its own occupation by granting operating leases. Where the council grants leases it does so at best consideration unless it wishes to support the tenant financially, for example where tenants provide a service to the community.

Where the council wishes to support a tenant financially it needs to be satisfied that the use of the property supports the authority's Corporate Plan objectives and is not otherwise commercially viable. The council uses a system where the tenant pays a rent equivalent to best consideration and enters into a service agreement linked to the lease, which includes a grant from the council in lieu of some or all of the rent, depending on the service provided from the property.

The council received £4,136,981 in rental income in 2019/20 from its granted leases (£4,063,136 in 2018/19).

The future minimum lease payments receivable in future years under non-cancellable operating leases are:

	31st March 2020 £'000	31st March Restated* 2019 £'000
Not later than 1 year	4,477	4,477
2 – 5 years	17,029	16,454
More than 5 years	100,919	102,849
	122,425	123,780

*Restated to correct the 2-5 years figure

24. INTANGIBLE ASSETS

All of the intangible assets held relate to computer software, licenses being held for a number of the council's main software packages e.g. the Financial Management System. The intangible assets include both purchased licences and internally generated assets relating to the software. The balance is amortised to the relevant service revenue account over the useful life of the software (normally 5 – 10 years) on a straight line basis. The movement on intangible asset balances during the year is as follows:

	2019/20 Software £'000	2018/19 Software £'000
Balance at 1st April		
- Gross carrying amounts	1,282	1,127
- Accumulated amortisation	(772)	(606)
Net carrying amount at start of year	510	521
Additions - purchases	131	155
Amortisation in Year	(139)	(166)
Balance at 31st March	502	510
Comprising:		
- Gross carrying amounts	1,413	1,282
- Accumulated amortisation	(911)	(772)
	502	510

25. ASSETS HELD FOR SALE

	Current	
	31st March 2020	31st March 2019
	£'000	£'000
Balance outstanding at start of year	-	155
Assets newly classified as held for sale from		
- Property, Plant and Equipment	60	-
Fair value of assets sold	-	(155)
Balance outstanding at year end	60	-

26. FINANCIAL INSTRUMENTSCategories of financial instrument

The following categories are carried on the Balance Sheet:

	Current		Long term	
	31st March 2020 £'000	31st March 2019 £'000	31st March 2020 £'000	31st March 2019 £'000
Investments				
Financial assets at amortised cost (note i below)	7,035	8,048	603	1,345
Fair value through other comprehensive income				
- shares in unlisted companies (note ii)	-	-	1,700	1,700
Fair value through P&L - Pooled Funds (note iii)	75	75	5,783	6,656
Total Investments	7,110	8,123	8,086	9,701
Debtors				
Financial assets at amortised cost	5,630	2,892	10,739	9,744
Total included in debtors (note iv)	5,630	2,892	10,739	9,744
Cash and Cash equivalents				
Financial assets at amortised cost	2,174	751		
Fair value through P&L (note v)	18,995	2,000		
Financial liabilities at amortised cost	-	(596)		
Total cash and cash equivalents	21,169	2,155		
TOTAL FINANCIAL ASSETS	33,909	13,170	18,825	19,445
Borrowings				
Financial liabilities at amortised cost				
- Public Works Loan Board (PWLb) loans	759	730	99,393	96,065
- Bank and other loans	69,336	8,276	15,900	15,900
Total borrowings	70,095	9,006	115,293	111,965
Creditors				
Financial liabilities at amortised cost	9,226	6,425	-	-
Total included in creditors (Note vi)	9,226	6,425	-	-
TOTAL FINANCIAL LIABILITIES	79,321	15,431	115,293	111,965

Notes

(i) These comprise deposits with banks and other local authorities and bank certificates of deposit.

(ii) These comprise shares held in Gloucestershire Airport Limited. The fair value has been assessed by the council's treasury management advisors, based on projected company cash flows using the airport's business plans (Level 3 inputs in the fair value hierarchy). The valuation is therefore sensitive to small changes in rental, interest and operating income and cost inflation, including aviation fuel and pension costs.

The shares are not held for trading and there are no plans to dispose of them.

In addition the council holds shares costing £1 in Ubico Limited. The fair value of the council's interests in the company at 31st March 2020 is considered to be nil, since it is a wholly local authority owned not-for-profit 'Teckal' company. As a Teckal' company it is treated as if it was an in house department and the shareholder councils are able to enter into service contracts with the company without undertaking an EU compliant procurement process.

- (iii) These comprise units in the CCLA pooled property fund, the Schrodgers Income Maximising Fund and CCLA Diversified Income Fund, the carrying (fair) value of which has been assessed using Level 1 inputs in the fair value hierarchy (quoted prices for identical units) at 31st March 2020.
- (iv) Further details of current debtors are given in note 27, page 73. The figures shown above exclude payments in advance and non-exchange transactions, such as taxes and grants due, which are not classified as financial instruments.

Long term debtors at 31st March 2020 mainly comprise:

- an outstanding loan of £0.334 million (£0.496 million at 31st March 2019) to the Cheltenham Everyman Theatre (made in 2011/12 for 25 years towards the redevelopment of the theatre)
- loans totalling £6.304 million (£6.415 million at 31st March 2019) made to Cheltenham Borough Homes Limited for between 30 and 50 years for housing redevelopment
- finance lease repayments of £3.119 million (£2.392 million at 31st March 2019) due from Ubico Limited (relating to leases of vehicles and plant)
- a loan of £0.258 million (£0.383 million at 31st March 2019) to Gloucestershire Airport Limited towards the cost of the runway safety project. In addition investments include a loan of £275,000 made to the Airport in 2019/20 to add to the investment loan made of £325,000 in 2018/19, taking the outstanding balance to £600,000 as at 31st March 2020.

The remainder comprises mortgages for house purchase and other loans.

- (v) These comprise money market funds that are readily convertible to known amounts of cash and subject to insignificant risk of changes in value.
- (vi) Further details of current creditors are given in note 29, page 74. The figures shown above exclude receipts in advance, which are not classified as financial instruments.

Income, Expense, gains and losses

	2019/20				2018/19			
	Financial Liabilities at amortised cost	Financial Assets at amortised cost	Financial Assets: Fair value through P&L	Total	Financial Liabilities at amortised cost	Financial Assets at amortised cost	Financial Assets: Fair value through P&L Restated*	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Interest expense	3,948	-	-	3,948	3,139	-	-	3,139
Fee expense	40	-	1	41	30	-	1	31
Changes in fair value	-	-	870	870	-	-	178	178
Impairment losses	-	(3)		(3)	-	(5)	-	(5)
Total expenses in Surplus or Deficit on the Provision of Services	3,988	(3)	871	4,856	3,169	(5)	179	3,343
Interest Income	-	(452)	(326)	(778)	-	(457)	(350)	(807)
Interest Income accrued on impaired financial assets	-	(1)	-	(1)	-	(1)	-	(1)
Total income in Surplus or Deficit on the Provision of Services	-	(453)	(326)	(779)	-	(458)	(350)	(808)
(Net gain)/loss for the year	3,988	(456)	545	4,077	3,169	(463)	(171)	2,535
*Restated to include fair value changes in 2018/19								

Fair Value of financial assets and liabilities

The fair values of the authority's financial assets and liabilities are shown below, where different to their carrying amounts. The fair values have been assessed as equal to the present value of the expected cash flows over the remaining term of the instruments, using the following assumptions:

- for financial liabilities, the new maturity rates from the Public Works Loan Board (PWLB) at 31st March have been used. The valuation basis therefore uses Level 2 inputs (i.e. observable inputs other than quoted prices) in the fair value hierarchy.
- no early repayment or impairment is recognised
- where an instrument will mature in the next twelve months, fair value is assumed to approximate to amortised cost
- the fair value of trade and other short term payables and receivables is taken to be the invoiced or billed amount
- the fair value can be reliably estimated.

	2019/20		2018/19	
	Carrying amount £'000	Fair Value £'000	Carrying amount £'000	Fair Value £'000
Financial Assets				
Investments at amortised cost	603	603	1,345	1,365
Long term debtors at amortised cost	10,258	12,320	9,744	11,636

The fair value of long term debtors is higher than the carrying amount because the debtors include fixed rate loans where the interest rate receivable from borrowers is higher than the rates available for similar loans at the Balance Sheet date.

	2019/20		2018/19	
	Carrying amount £'000	Fair Value £'000	Carrying amount £'000	Fair Value £'000
Financial Liabilities				
Borrowing – PWLB loans*	99,393	116,028	96,795	111,144
- long term bank loans	15,900	25,080	15,900	23,602
Total borrowing	115,293	141,108	112,695	134,746

*includes current borrowing

The fair value is higher than the carrying amount because the council's borrowing includes fixed rate loans where the interest rate payable is higher than the rates available for similar loans at the Balance Sheet date. The commitment to pay interest above current market rates increases the amount that the council would have to pay if it requested early repayment of the loans.

In the case of long term bank loans £7 million is subject to 'Lenders Option, Borrowers Option' (LOBO loans) the borrower's options to accept the increased rate or repay the loan have been valued at nil, on the assumption that lenders will only exercise their options when market rates have risen above the contractual rate.

Nature and extent of risks arising from financial instruments

The council's activities expose it to a variety of financial risks. The key risks are:

- credit risk – the risk that other parties might fail to pay amounts due to the council
- liquidity risk – the possibility that the council might not have funds available to meet its commitment to make payments
- market risk – the possibility that financial loss might arise for the council as a result of changes in such measures as interest rates

The council's overall risk management procedures focus on the unpredictability of financial markets, and are structured to implement suitable controls to minimise these risks. The procedures for risk management are set out through a legal framework based on the Local Government Act 2003 and associated regulations. These require the council to comply with the CIPFA Prudential Code for Capital Finance and the CIPFA Code of Practice on Treasury Management in Local Authorities (both revised in December 2017) and government investment guidance issued under the Act (revised in January 2018). Overall, these procedures require the council to manage risk in the following ways:

- by the adoption of a Treasury Policy Statement and treasury management practices within its financial regulations
- by approving annually in advance prudential and treasury indicators for the following three years
- by approving an investment strategy for the forthcoming year, setting out its criteria for both investing and selecting investment counterparties in compliance with government guidance.

These are required to be reported and approved at or before the council's annual Council Tax setting or before the start of the financial year to which they relate. The items are reported with the annual treasury management strategy, which outlines the detailed approach to managing risk in relation to the council's financial instrument exposure. Actual performance is also reported after each year, as is a mid-year update.

The annual treasury management strategy which incorporates the prudential indicators was approved by Council on 25th March 2019. The two key controls were:

- The Authorised Limit for 2019/20 was set at £217 million. This is the maximum limit of external borrowings or other long term liabilities
- The Operational Boundary for 2019/20 was set at £207 million. This is the expected level of debt and other long term liabilities during the year.

These policies are implemented by a central treasury team. The council maintains written principles for overall risk management, as well as written policies (Treasury Management Practices or TMPs) covering specific areas such as interest rate risk, credit risk and the investment of surplus cash. These TMPs are a requirement of the Code of Practice and are reviewed periodically.

Credit Risk

Credit risk arises from investments mainly with banks and other financial institutions, as well as credit exposure to the council's customers. This risk is minimised through the Annual Investment Strategy, which requires that investments are not made with financial institutions unless they meet identified minimum credit criteria, in accordance with the Fitch, Moody's and Standard & Poor's Credit Ratings Services. The Annual Investment Strategy also sets the maximum amounts and time limits in respect of

each counterparty. Investments are not made with banks and financial institutions unless they meet the minimum requirements of the investment criteria.

The council used the creditworthiness services of Arlingclose Limited during 2019/20. The maximum investment that could be made with an approved UK counterparty was £7 million in 2019/20. No breaches of the council's counterparty criteria occurred during the reporting period and the council does not expect any losses from non-performance by any of its counter-parties.

The council's maximum exposure to credit risk in relation to its investments cannot be assessed generally, as the risk of any institution failing to make interest payments or repay the principal sum will be specific to that individual organisation. Recent experience has shown that it is rare for such entities to be unable to meet their commitments. A risk of default applies to all of the council's investments, but there was no evidence at 31st March 2020 that this is likely to materialise. The following analysis summarises the council's potential maximum exposure to credit risk for investments outstanding at 31st March 2020 (excluding Group equities), based on experience of default assessed by the ratings agencies and adjusted to reflect current market conditions.

	Amount at 31 March 2020 £000 (a)	Historical experience of default % (b)	Adjustment for market conditions at 31 March 2020 % (c)	Estimated maximum exposure to Default £000 (a*c)
Investments with banks and other financial institutions				
AA- rated counterparties	9,990	0.06	1.22	10
A+ rated counterparties	-	-	-	-
UK LA	10,000	-	-	-
Unrated pooled funds/MMF's	13,600	-	-	-
	33,590			10

The historical experience of default has been taken from average one year default rates published by the three main rating agencies at May 2020, relating to 2019 figures. Whilst current economic conditions have raised the overall possibility of default, the council maintains strict credit criteria for investment counterparties.

Due to the estimated maximum exposure to default amount being immaterial, no loss provision for 12 month expected credit losses under IFRS 9 has been charged to the Comprehensive Income and Expenditure Statement.

The council does not generally allow credit for its trade debtors as payment is due immediately. This means that all of the £1,072,256 trade debtor balance is technically past its due date for payment. The past due amount can be analysed by age as follows:

	2019/20 £000	2018/19 £000
Less than 3 months	917	1,522
3 to 6 months	64	50
6 months to 1 year	9	64
Over 1 year	82	151
	1,072	1,787

A loss provision of £279,400 at 31st March 2020 (£325,800 at 31^s March 2019) has been provided to cover the expected lifetime credit losses on these debts under IFRS 9.

Liquidity risk

The council has ready access to borrowings from the money markets to cover any day to day cash flow needs, and the Public Works Loan Board and money markets for access to longer term funds, ensuring there is no significant risk that it will be unable to raise finance to meet its commitments under financial instruments. Instead, the risk is that the council could be required to replenish a significant portion of its borrowings at a time of unfavourable interest rates. This risk is reduced by working towards a rolling programme to ensure the maturity of loans is spread over a period of time.

The maturity analysis of borrowings (excluding interest payable) is as follows:

	31 st March 2020 £'000	31 st March 2019 £'000
Less than 1 year	695	644
2-5 years	9,998	6,356
6-10 years	5,326	6,185
Uncertain date maturing in more than 10 years*	99,274	99,410
Total	115,293	112,595

*The council has £7 million (£7 million at 31st March 2019) of 'Lender's option, Borrower's option' (LOBO) loans where the lenders have the option to propose an increase in the rates payable; if this occurs the council will have the option to accept the new rate or repay the loans without penalty. Due to current low interest rates, in the unlikely event the lenders exercise their options; the council is likely to repay the loan(s). The repayment dates of these loans are therefore uncertain, although they are due to mature in 48 years.

Market risk

The council is exposed to risk in terms of its exposure to interest rate movements on its borrowings and investments. By way of illustration, if interest rates were 1% higher in 2019/20, this would have had the following effect on the interest charged or credited to the surplus or deficit on the provision of services in the Comprehensive Income and Expenditure Statement:

	Amount outstanding (weighted average) in year £'000	Average actual interest rate %	Actual Interest payable / (receivable) £'000	Projected interest rate %	Projected interest payable / (receivable) £'000	Variation £'000
Borrowing						
Variable rate	37,008	0.73	270	1.73	640	370
Lending						
Fixed rate (up to 1 year)	21,151	2.02	427	3.02	639	(212)
Variable rate						
Net loss / (gain) on surplus / deficit for year						158

Due to the large proportion of borrowing held at fixed rates the impact on interest payable is limited. Conversely, the proportion of lending at variable rates and fixed rate allows the council to benefit from any increase in interest rates in the future. A large proportion of fixed rates is short term so any rate increases will benefit future investment returns.

Changes in interest rates will also affect the fair values of financial liabilities and financial assets classed as Loans and Receivables, however because these are carried at amortised cost rather than fair value,

do not impact on the surplus or deficit on the provision of services or reserves. A rise in interest rates for example will reduce the fair value of borrowings and long term investments.

The council has a number of strategies for managing interest risk. During periods of falling interest rates, and where economic circumstances make it favourable, fixed rate loans will be repaid early to limit exposure to losses.

The authority is also exposed to risk in terms of its exposure to market prices. With the exception of 'pooled' funds, nominal gains and losses on borrowings and investments do not impact on the Comprehensive Income and Expenditure Statement or the Movement in Reserves Statement.

The council's investment in a pooled property fund is subject to the risk of falling commercial property prices. For example a 5% fall would result in a £142k charge to Other Comprehensive Income and Expenditure, although it would not affect the surplus or deficit on the provision of services unless the fund units were sold. The risk is limited by the council setting a maximum exposure to financial assets invested in property of £3 million and its intention to hold the units in the fund for a minimum period of 5 years.

The risk of rental income affecting future revenue from the fund would occur if commercial properties were to become vacant for long periods of time and would reduce the returns due to be received.

27. SHORT TERM DEBTORS

	31st March 2020 £'000	31st March 2019 £'000
Central Government Bodies	7,999	2,046
Other Local Authorities	1,745	889
Other entities and individuals-		
- Council Taxpayers	416	355
- Business Ratepayers	245	306
- Cheltenham Borough Homes	530	294
- Ubico Limited	1,444	689
- Housing Rents	423	239
- Sundry Debtors	2,961	2,477
Total	15,763	7,295

Each line is presented net of any allowance for impairments (provision for bad debts).

28. CASH AND CASH EQUIVALENTS

The balance of cash and cash equivalents is made up of the following elements:

	31st March 2020 £'000	31st March 2019 £'000
Cash held by the Authority	6	6
Bank current accounts	2,168	2
Short term deposits and money market funds	18,995	2,745
Cash and cash equivalent assets	21,169	2,753
Cash and cash equivalent liabilities - bank overdraft	-	(598)
Net Cash and cash equivalents per Cash flow Statement	21,169	2,155

29. SHORT TERM CREDITORS

	31st March 2020 £'000	31st March 2019 £'000
Central Government Bodies	3,783	512
Other Local Authorities	1,051	3,857
Public corporations and trading funds	20	-
Other entities and individuals-		
- Council Taxpayers	123	99
- Business Ratepayers	1,833	2,442
- Cheltenham Borough Homes Limited	1,137	1,882
- Ubico Limited	46	451
- Housing Rents	442	336
- Sundry Creditors	7,336	4,455
Total	15,771	14,034

30. PROVISIONS

	Balance at 1st April £'000	Additional provisions made in Year £'000	Amounts used/reallocated in Year £'000	Balance at 31st March £'000
Short term				
Insurance	6	-	-	6
Business rates retention – RV reductions	977	218	(715)	480
	983	218	(715)	486
Long term				
Business rates retention – RV reductions	651	349	-	1,000
Total 2019/20	1,634	567	(715)	1,486
Total 2018/19	1,319	1,389	(1,074)	1,634

Insurance

The Insurance Provision was established to fund the cost of insurance policy excesses arising from claims against the council by third parties. The provision represents the value of an assessment of the council's liability in respect of the current insurance claims outstanding with the council's insurers. Transfers between the Insurance Provision and the Insurance Reserve are made in order to provide adequate funding for the outstanding claims liability notified by the insurance company.

The insurance reserve is used to fund losses for which the council does not carry insurance cover, fluctuations in insurance premiums and corporate risk management strategy implementation.

Business Rates Retention – RV reductions including Appeals

The Local Government Finance Act 2012 introduced a business rates retention scheme that enables local authorities to retain a proportion of the business rates generated in their area. The new arrangements for the retention of business rates came into effect on 1st April 2013.

From this date local authorities acquired a share of the liability for refunding ratepayers who have successfully appealed against the rateable value of their properties and other reductions resulting from changes in the rating list. This includes amounts paid over to central government in respect of 2012/13 and prior years. Consequently the council considers it necessary to make a provision to cover its share of

the repayments likely to be made. The provision is based on the expected success rate of appeals recorded by the Valuation Office at 31st March 2020 relating to appeals raised against charges up to 31st 2017 and, for charges after this date, on an estimated reduction on the rating list based on historical experience, together with other known likely reductions. It has been split into short and long term elements to reflect the estimated time until settlement.

31. CONTINGENT LIABILITIES

Municipal Mutual Insurance Limited:

The council's former insurers, Municipal Mutual Insurance Limited, ceased trading in 1992; the council became a party to the scheme of administration for liabilities outstanding at that time. Whilst there is a very low risk that the assets of the company will not meet the liabilities from insurance claims, the scheme guarantees that the council will reimburse the total of payments made in respect of claims less £50,000. At 31st March 2020 this potential total liability equated to £318,014, made up as follows:

	£
Gross claim payments to date	474,019
15% levy paid 2013/14	(63,603)
10% levy paid 2016/17	(42,402)
Net Payments	368,014
Levy retention	(50,000)
Potential liability 31st March 2020	318,014

This position has not changed since 2016/17, but is kept under review annually to ensure that a solvent run-off of the company's business is still anticipated. The likelihood and timing of any additional liabilities is unknown at this stage.

32. USABLE RESERVES AND TRANSFERS TO / FROM EARMARKED RESERVES

Movements in the authority's usable reserves are detailed in the Movement in Reserves Statement. Movements in the *earmarked* reserves shown on the statement are detailed below:

	Balance at 1 April 2018 £'000	Transfers out 2018/19 £'000	Transfers in 2018/19 £'000	Balance at 31 March 2019 £'000	Transfers out 2019/20 £'000	Transfers in 2019/20 £'000	Balance at 31 March 2020 £'000
Earmarked Reserves							
Capital Reserve	266	(133)	200	333	(402)	200	131
Equalisation Reserves	2,462	(973)	675	2,164	(816)	62	1,410
Repairs & Renewals Reserve	1,897	(1,387)	753	1,263	(276)	292	1,279
Reserves for Commitments	308	(308)	624	624	(594)	162	192
Other earmarked reserves	3,188	(1,461)	180	1,907	(575)	152	1,484
Total	8,121	(4,262)	2,432	6,291	(2,663)	868	4,496

Purpose of reserves

- **Capital Reserve** – to help finance the general fund capital programme.
- **Equalisation Reserves** – to smooth out fluctuations in expenditure or income resulting from cyclical events, for example bi-annual local elections, and to cushion the impact of fluctuating activity levels (for example in housing benefit payments or business rates).
- **Repairs and Renewals Reserve** – to meet the cost of planned and reactive repairs to buildings and infrastructure.
- **Reserves for Commitments** – to cover the cost of budget commitments where spending did not take place in the year approved, but is planned to take place in the following year.
- **Other earmarked reserves** – sums built up to cover future planned expenditure, for example support for the revenue budget, risk management, and Public Realm improvements.

33. UNUSABLE RESERVES

The council keeps a number of reserves which do not represent usable resources for the council as they are required to be held for statutory reasons, or to comply with proper accounting practice.

Reserve	31st March 2020 £'000	31st March 2019 £'000	Purpose of Reserve
Revaluation Reserve	161,284	161,755	Store of gains on revaluation of non-current assets not yet realised through sales
Financial Instruments Revaluation Reserve	1,099	1,099	Store of gains and losses arising from changes in the value of financial instruments (excluding on pooled funds from 1st April 2018) carried at fair value through other comprehensive income and not yet realised through sales
Pooled Investment Funds Adjustment Account	(1,050)	(178)	Store of gains and losses arising from changes in the fair value of pooled investment funds since 1 st April 2018
Capital Adjustment Account	185,891	191,494	Store of capital resources set aside to meet past expenditure
Financial Instruments Adjustment Account	(1,601)	(1,747)	Balancing account to allow for differences in statutory requirements and proper accounting practices relating to borrowing and investments
Collection Fund Adjustment Account	(647)	(419)	Balancing account to allow for differences in statutory requirements and proper accounting practices for council tax and NNDR (business rates) surpluses/deficits
Pensions Reserve	(51,307)	(61,920)	Balancing account to allow inclusion of Pension Liability in the Balance Sheet.
Deferred Capital Receipts Reserve	3,926	2,952	Capital receipts to be received in future years e.g. from finance lease or mortgage repayments
Accumulating Compensated Absences Adjustment Account	(122)	(122)	Balancing account to allow for differences in statutory requirements and proper accounting practices for staff leave and additional hours not taken at the year end
Total Unusable Reserves	297,473	292,914	

Revaluation Reserve

	2019/20 £'000	2018/19 £'000
Balance at 1st April	161,755	156,481
Revaluation gains on non-current assets	6,659	11,022
Downward revaluation of assets and impairments	(3,730)	(2,271)
Surplus or deficit on revaluation of non-current assets not posted to the Surplus or Deficit on the Provision of Services	164,684	165,232
Accumulated gains on assets sold, derecognised or reclassified	-	(49)
Difference between fair value and historic cost depreciation	(3,400)	(3,428)
Amount written off to the Capital Adjustment Account	(3,400)	(3,477)
Balance at 31st March	161,284	161,755

The Revaluation Reserve contains gains arising from increases in the value of Property, Plant and Equipment, Heritage Assets and Assets Held for Sale arising since 1st April 2007. Accumulated gains arising before that date are consolidated into the Capital Adjustment Account. The balance is reduced when assets with accumulated gains are re-valued downwards or impaired, depreciated or disposed of. The balance on the reserve therefore represents the amount by which the current values of non-current assets carried on the Balance Sheet are greater because they are carried at re-valued amounts rather than at depreciated historical cost.

Financial Instruments Revaluation Reserve

This reserve (formerly the Available-for-Sale Financial Investments Reserve) contains gains arising from increases in the value of investments that have quoted market prices or otherwise do not have fixed or determinable payments, with the exception of gains and losses on pooled investment funds since 1st April 2018, which are contained in a separate reserve (see below). The balance is reduced when investments with accumulated gains are revalued downwards and the gains are lost, or when the investments are disposed of and the gains realised.

	2019/20 £'000	2018/19 £'000
Balance at 1st April	1,099	(166)
Revaluation of investments not charged to the surplus or deficit on the provision of services:		
Upward revaluations	-	1,265
Balance at 31st March	1,099	1,099

Pooled Investment Funds Adjustment Account

This reserve contains gains and losses on pooled funds arising from changes in their fair value from 1st April 2018. Such changes are initially charged to the surplus or deficit in the provision of services but reversed out to this reserve by a statutory override in the Movement in Reserves Statement.

Capital Adjustment Account

	2019/20 £'000	2018/19 £'000
Balance at 1st April	191,494	189,381
Reversal of items relating to capital expenditure debited or credited to the Comprehensive Income and Expenditure Statement		
• Charges for depreciation and impairment of non-current assets	(9,954)	(9,730)
• Revaluation gains/(losses) on Property, Plant and Equipment	(2,100)	(1,915)
• Amortisation of intangible assets	(139)	(165)
• Donated Assets	-	33
• Revenue expenditure funded from capital under statute	(415)	(454)
• Amounts of non-current assets written off on disposal or sale as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	(2,712)	(1,733)
	176,174	175,417
Capital receipts received on repayment of long term loans	(399)	(246)
Adjusting amounts written out of the Revaluation Reserve	3,400	3,477
Net amount written out for the cost of non-current assets consumed in the year	179,175	178,648
Capital Financing applied in the year:		
• Use of Capital Receipts Reserve to finance new capital expenditure	3,405	4,831
• Use of the Major Repairs Reserve to finance new capital expenditure	4,936	4,747
• Capital grants and contributions credited to the Comprehensive Income and Expenditure Statement that have been applied to capital financing and application of grants to capital financing from the Capital Grants Unapplied Account	1,289	1,428
• Statutory and voluntary provision for the financing of capital investment charged against the General Fund Balance	1,836	1,222
• Statutory provision for the financing of capital investment charged against usable capital receipts	396	243
• Capital expenditure charged against the general fund and HRA balances	3,370	2,749
	194,407	193,868
Movements in the market value of Investment properties (charged) or credited to the Comprehensive Income and Expenditure Statement	(8,516)	(2,374)
Balance at 31st March	185,891	191,494

The Capital Adjustment Account accumulates the resources that have been set aside to finance capital expenditure, which are then reduced by the write-down of the historical cost of non-current assets as they are consumed by depreciation and impairments, or written off on disposal.

The balance thus represents the timing differences between the historical cost of non-current assets that have been consumed, and the cost financed in accordance with statutory requirements.

The Account also contains accumulated gains and losses on Investment properties that have yet to be consumed by the council and revaluation gains accumulated on Property, Plant and Equipment before 1st April 2007, the date that the Revaluation Reserve was created to hold such gains.

Financial Instruments Adjustment Account

	2019/20 £'000	2018/19 £'000
Balance at 1st April	(1,747)	(1,893)
Net Premiums incurred in previous years charged against the General Fund and HRA Balance	146	146
Balance at 31st March	(1,601)	(1,747)

This account absorbs the timing differences between the accounting treatment of income and expenses relating to certain financial instruments, and their statutory provisions.

Where premiums and discounts arising on the early repayment of loans are required to be charged to the Comprehensive Income and Expenditure Statement, regulations allow the impact on the General Fund Balance to be spread over a number of years. The council has a policy of spreading the gain or loss over the period that was remaining on the loan when it was repaid. The reconciliation of amounts required to be charged to the Comprehensive Income and Expenditure Statement to the net charge made against the General Fund Balance is managed by a transfer to or from the Financial Instruments Adjustment Account in the Movements in Reserves Statement.

Collection Fund Adjustment Account

This account reflects the difference between the rate at which collection fund surpluses or deficits are released to the council's General Fund Balance according to proper accounting practice, and the rate at which they are released according to statute. Proper accounting practice requires the surpluses or deficits generated in the year to be included in the Comprehensive Income and Expenditure Statement for the year, whereas statute does not allow these to be released to the general fund balance until the following year. The balance on this account therefore represents the surplus available to be released to the general fund balance in the future.

	2019/20 £'000	2018/19 £'000
Balance at 1st April	(419)	(490)
Amount by which council tax and non-domestic rates income credited to the Comprehensive Income and Expenditure Statement is different from that calculated for the year in accordance with statutory requirements	(228)	71
Balance at 31st March	(647)	(419)

Pensions Reserve

The Pensions Reserve absorbs the timing differences arising from the different arrangements for accounting for post-employment benefits and for funding benefits in accordance with statutory provision. The council accounts for post-employment benefits in the Comprehensive Income and Expenditure Statement as the benefits are earned by employees accruing years of service, updating the liabilities recognised to reflect inflation, changing assumptions and investment returns on the resources set aside to meet the costs.

However statutory arrangements require benefits earned to be financed when the council makes employer's contributions, or eventually pays any pensions for which it is directly responsible. The debit balance on the Pensions Reserve therefore shows a substantial shortfall in the benefits earned by past and current employees and the resources the council has set aside to meet them. The statutory arrangements will ensure that funding will have been set aside by the time the benefits come to be paid.

	2019/20 £'000	2018/19 £'000
Balance at 1st April	(61,920)	(57,776)
Re-measurement of the net defined benefit liability	10,251	(4,887)
Reversal of items relating to retirement benefits charged or credited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement	(4,615)	(3,994)
Employer's pension contributions and direct payments to pensioners payable in the year	4,977	4,737
Balance at 31st March	(51,307)	(61,920)

Deferred Capital Receipts Reserve

This comprises capital receipts receivable in future years, for example from finance leases and mortgage repayments, which are not usable until they are received. The amount at 31st March 2020 includes £3,921 million (£2.945 million at 31st March 2019) for vehicles and plant leased to Ubico Limited under finance leases.

	2019/20 £'000	2018/19 £'000
Balance at 1st April	2,952	3,221
Transfer of deferred sale proceeds credited as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	1,605	274
Transfer to the Capital Receipts Reserve upon receipt of cash	(631)	(543)
Balance at 31st March	3,926	2,952

34. DEFINED BENEFIT PENSION SCHEME**Participation in the pension scheme**

As part of the terms and conditions of employment of its officers and members, the council makes contributions towards the cost of post-employment benefits. Although these benefits will not actually be payable until employees retire, the council has a commitment to make the payments that needs to be disclosed at the time that employees earn their future entitlement.

Cheltenham Borough Council is a member of the Gloucestershire County Council Pension Fund, for which Gloucestershire County Council is the administering authority. It is contracted out of the State Second Pension. The scheme is a defined benefit statutory scheme that is administered in accordance with the Local Government Pension Scheme Regulations 1997 (as amended). This means that the council and employees pay contributions into a fund, calculated at a level intended to balance the pensions' liabilities with investment assets.

The principal risks to the authority of the pension scheme are the longevity assumptions, statutory changes to the scheme, structural changes to the scheme (i.e. large-scale withdrawals from the scheme), changes to inflation, bond yields and the performance of equity investments held by the scheme. These are mitigated to a certain extent by the statutory requirements to charge to the General Fund and Housing Revenue Account the amounts required by statute, as described in the accounting policies note 1.3 on page 22.

Transactions relating to post-employment benefits

The council recognises the costs of retirement benefits in the Net Cost of Services when they are earned by employees, rather than when the benefits are eventually paid as pensions. However, the charge the council is required to make against council tax is based on the cash payable in the year, so the real cost of retirement benefits is reversed out of the General Fund in the Movement in Reserves Statement (MIRS). The following transactions have been made in the Comprehensive Income and Expenditure Statement (CIES) and the General Fund Balance via the MIRS during the year:

	2019/20 £000	2018/19 £000
Comprehensive Income and Expenditure Statement (CIES):		
Service cost comprising:		
Current service cost	(3,015)	(2,566)
Past service cost	(154)	(94)
Financing and Investment Income and Expenditure:		
Net Interest Expense	(1,446)	(1,334)
Total post-employment benefits charged to Surplus or Deficit on Provision of Services	(4,615)	(3,994)
Other post-employment benefits charged to the CIES:		
Re-measurement of the net defined benefit liability comprising:		
Prior year adjustment re McCloud judgement	(458)	-
Return on assets (excluding the amount included in the net interest expense)	(9,022)	2,916
Changes in demographic assumptions	5,245	-
Changes in financial assumptions	11,355	(7,735)
Other experience	3,131	(68)
Total post-employment benefit charged to CIES	5,636	(8,881)
Movement in Reserves Statement:		
Reversal of net charges made to Surplus or Deficit on Provision of Services for post-employment benefits in accordance with the Code	(4,615)	(3,994)
Actual amount charged against General Fund Balance for pensions in the year		
Employer's pension contributions and direct payments to pensioners	4,977	4,737

2018/19 and 2019/20 Up-Front Payment of Pension Scheme Deficit Contributions

In 2017/18 the Council made an up-front payment of the LGPS deficit contributions for the two years 2018/19 and 2019/20 totalling £7.084 million. The up-front payment took advantage of the independent actuary's calculation of the return these contributions could achieve once invested by the Pension Fund.

The discount calculated by the actuary for making the up-front payment rather than the normal method of monthly payments in arrears over the two year period was £0.389 million, reducing total payments from £7.473 million to £7.084 million.

The return was judged to be far greater than could have been achieved by investing the amounts as part of the council's treasury management strategy, so the decision represented good value for money for the council.

The actual payment made in 2017/18 was £7.084 million, and the actuary calculated the Equivalent Discounted annual Lump Sums Certified across the 2 years as follows:

- £3.422 million relating to 2018/19, and
- £3.662 million relating to 2019/20.

The Pension Liability at 31st March 2018 was reduced by the £7.084 million payment, and the full amount was reflected in the actuarial valuation as at 31st March 2020. The £3.662 million relating to 2019/20 has been charged to the General Fund in 2019/20, with the amounts credited to the Pension Reserve and charged to the General Fund via the Movement In Reserves Statement.

Pension Assets and Liabilities recognised in the Balance Sheet

The amount included in the balance sheet arising from the council's obligation in respect of its defined benefit plan is as follows:

	2019/20 £'000	2018/19 £'000
Present value of the defined benefit obligation	(140,859)	(158,253)
Fair value of plan assets	89,552	99,995
Net liability arising from defined benefit obligation	(51,307)	(58,258)

Reconciliation of the present value of the scheme liabilities (Defined Benefit Obligation)

	Funded Liabilities Local Government Pension Scheme	
	2019/20 £'000	2018/19 £'000
Opening Balance at 1st April	(158,253)	(148,678)
Current service cost	(3,015)	(2,566)
Past service cost (including curtailments)	(612)	(94)
Interest cost	(3,792)	(3,836)
Contributions from scheme participants	(451)	(423)
Remeasurement gain/(loss):		
Arising from changes in demographic assumptions	5,245	
Arising from changes in financial assumptions	11,355	(7,735)
Other experience	3,131	(68)
Benefits paid	5,435	5,041
Unfunded benefits paid	98	106
Closing balance at 31st March	(140,859)	(158,253)
Present value of Funded liabilities	(139,499)	(156,556)
Present value of Unfunded liabilities	(1,360)	(1,697)
Closing balance 31st March	(140,859)	(158,253)

The Local Government Pension scheme assets at 31st March comprised:

Asset Category	Fair Value of Scheme Assets 2019/20			Fair Value of Scheme Assets 2018/19		
	Quoted prices in active markets	Quoted prices not in active markets	Total	Quoted prices in active markets	Quoted prices not in active markets	Total
	£000	£000	£000	£000	£000	£000
Debt Securities:						
Corporate Bonds - investment grade	9,949.7	-	9,949.7	10,215.3	-	10,215.3
Corporate Bonds - non investment grade	213.9	-	213.9	425.6	-	425.6
UK Government	1,642.0	-	1,642.0	3,147.9	-	3,147.9
Other	247.5	-	247.5	-	-	-
Private equity:						
All	-	295.3	295.3	-	220.7	220.7
Real Estate:						
UK Property	4,967.4	1,588.1	6,555.5	6,341.1	2,128.0	8,469.1
Overseas property	-	461.5	461.5	-	617.9	617.9
Investment Funds and Unit Trusts:						
Equities	-	56,876.5	56,876.5	6,030.6	56,181.9	62,212.5
Bonds	7,074.9	-	7,074.9	7,992.3	-	7,992.3
Other	-	5,172.9	5,172.9	-	4,866.8	4,866.8
Derivatives:						
Foreign Exchange	19.2	-	19.2	(23.6)	-	(23.6)
Other	9.2	-	9.2	10.1	-	10.1
Cash & Cash equivalents:						
All	1,033.9	-	1,033.9	1,840.4	-	1,840.4
Totals	25,158	64,394	89,552	35,980	64,015	99,995

The Local Government Pension Scheme's assets consist of the following categories by proportion of the total assets held:

	2019/20 %	2018/19 %
Equity investments	78	68
Bonds	13	21
Property	8	9
Cash	1	2
Total	100	100

Reconciliation of movements in the fair value of the scheme (Plan) assets

	Funded Assets Local Government Pension Scheme	
	2019/20 £000	2018/19 £000
Opening fair value of scheme assets 1st April	99,995	97,986
Interest income	2,346	2,502
Remeasurement gain/(loss):		
Return on plan assets (excluding the amount included in the net interest expense)	(9,022)	2,916
Contributions from employees into the scheme	451	423
Contributions from employer	1,217	1,209
Contributions from employer in respect of unfunded benefits	98	106
Unfunded benefits paid	(98)	(106)
Benefits paid	(5,435)	(5,041)
Closing fair value of scheme assets 31st March	89,522	99,995

Basis for estimating assets and liabilities

Liabilities have been assessed on an actuarial basis using the projected unit method, an estimate of the pensions that will be payable in future years dependent upon assumptions about mortality rates, salary levels, etc.

The Gloucestershire County Council pension fund liabilities have been assessed by Hymans Robertson LLP, an independent firm of actuaries, estimates for the fund being based on the latest full valuation of the scheme as at 1st April 2019. The significant assumptions made in their calculations have been:

	Local Government Pension Scheme	
	2019/20	2018/19
Mortality assumptions:		
Longevity at 65 for current pensioners		
Men	21.7 years	22.4 years
Women	23.9 years	24.6 years
Longevity at 65 for future pensioners *		
Men	22.4 years	24 years
Women	25.3 years	26.4 years
Rate of pension increase / inflation (CPI)	1.9%	2.5%
Rate of increase in salaries	2.2%	2.8%
Rate for discounting scheme liabilities	2.3%	2.4%

* Future pensioners' numbers assume members aged 45 as at the last formal valuation date.

Commutation

An allowance is included for future retirements to elect to take 35% of the maximum additional tax-free cash up to HMRC limits for pre-April 2008 service and 68% of the maximum tax-free cash for post-April 2008 service.

Impact of McCloud judgement

The impact of this judgement has been included as a prior year adjustment, so is included in the liability at 31st March 2020.

Sensitivity analysis

The estimation of the defined benefit obligations is sensitive to the actuarial assumptions set out in the tables above. The sensitivity analysis below has been determined based on reasonably possible changes of the assumptions occurring at the 31st March 2020 and assumes for each change that the assumption analysed changes whilst all other assumptions remain constant. The methods and types of assumptions used in preparing the sensitivity analysis did not change from those used in the previous financial year.

Change in assumptions at year ended 31 March 2020	Approximate % increase to Employer	Approximate cost to Employer £000
0.5% decrease in Real Discount Rate	8%	11,332
0.5% increase in the Salary Increase Rate	1%	908
0.5% increase in the Pension Increase Rate	7%	10,346

The above figures have been derived based on the membership profile of the scheme as at the most recent actuarial valuation, being 31st March 2019.

Impact on the Council's Cash Flows

The objectives of the scheme are to keep employer's contributions at as constant a rate as possible. Funding levels are monitored on an annual basis, with the most recent triennial valuation on 31st March 2016.

35. CASH FLOW STATEMENT – OPERATING ACTIVITIES

The cash flows for operating activities include the following items:

	2019/20 £'000	2018/19 £'000
Interest received	(762)	(749)
Interest paid	3,986	3,049

The surplus or deficit on the provision of services has been adjusted for the following non-cash or additional cash movements:

	2019/20 £'000	2018/19 £'000
Depreciation	(9,954)	(9,730)
Impairment and downward valuations	(2,100)	(1,915)
Amortisation	(139)	(166)
Increase (-) / decrease in creditors	(6,350)	2,247
Increase / decrease (-) in debtors	7,598	(492)
Increase / decrease (-) in inventories	74	35
Movement in pension liability	(3,300)	(2,679)
Carrying amount of non-current assets sold or derecognised	(2,712)	(1,461)
Other non cash items charged to the net surplus or deficit on the provision of services	(9,239)	(2,828)
	(26,122)	(16,989)

The surplus or deficit on the provision of services has been adjusted for the following items that are investing and financing activities:

	2019/20 £'000	2018/19 £'000
Proceeds from the sale of PPE, investment property and intangible assets	3,462	3,005

36. CASH FLOW STATEMENT – INVESTING ACTIVITIES

	2019/20 £'000	2018/19 £'000
Purchase of property, plant and equipment, investment property and intangible assets	58,320	61,931
Purchase of Investments	11,275	17,325
Proceeds from the sale of property, plant and equipment, investment property and intangible assets	(2,488)	(3,529)
Proceeds from the sale of short and long term investments	(13,023)	(16,007)
Other receipts from investing activities	(399)	(265)
Net cash (inflows) / outflows from investing activities	53,685	59,455

37. CASH FLOW STATEMENT – FINANCING ACTIVITIES

	2019/20 £'000	2018/19 £'000
Cash receipts of short and long term borrowing	(265,001)	(189,867)
Other receipts/payments for financing activities	513	(1,134)
Repayments of short and long term borrowing	200,644	141,358
Net cash flows from financing activities	(63,844)	(49,643)

THE COLLECTION FUND - INCOME AND EXPENDITURE ACCOUNT

The Collection Fund is an agent's statement that reflects the statutory obligation of billing authorities (such as Cheltenham) to maintain a separate fund to record the collection and distribution of non-domestic rates and council tax.

2018/19 £'000		Note	2019/20 £'000
INCOME			
70,481	Council Tax	(i)	75,724
56,917	Non-Domestic Rates	(iii)	56,869
1,864	Contribution towards previous year's deficit Non-domestic rates		174
129,262	Total Income		132,767
EXPENDITURE			
69,618	Precepts & Demands from major preceptors and the Authority - Council Tax	(ii)	75,052
	Non-Domestic Rates	(iii)	
54,357	Shares paid to county council and the billing authority		27,492
-	Payment of central share to government		27,492
1,196	Transitional protection payments		560
170	Charge payable to General Fund for Costs of Collection		167
	Impairment of debts for Council Tax		
70	Allowance for Impairment		192
	Impairment of debts/appeals for non-domestic rates		
2,397	Allowance for Impairment		1,862
	Contribution towards previous year's surplus		
1,359	Council Tax		882
129,167	Total Expenditure		133,699
95	Surplus / (Deficit) for the Year		(932)
(241)	Balance of fund at 1st April		(146)
(146)	Balance of fund at 31st March	(iv)	(1,078)

NOTES TO THE COLLECTION FUND

(i). COUNCIL TAX

Council Tax is a property based tax with various reductions being made for differing circumstances e.g. single occupancy (25% discount). The Valuation Office has valued all domestic property in the area as at 1st April 1991 prices and has placed them into one of eight bands. A factor is then applied to each band so that the tax base can be expressed as a "Band D" equivalent (see below). A Band D council tax for the council and each preceptor is then calculated by dividing their requirements (their demands and precepts) by the Tax Base. Council taxes for other bands are then calculated by multiplying the Band D tax by the relevant proportion shown below.

Band	Estimated Number of Properties in each Band (adjusted for discounts)	Ratio	Band "D" Equivalents
A Disabled	4.0	5/9	2.2
A	8,038.4	6/9	5,358.8
B	11,441.8	7/9	8,899.1
C	12,494.5	8/9	11,106.2
D	8,383.5	1	8,383.5
E	4,634.0	11/9	5,663.8
F	2,480.5	13/9	3,582.9
G	1,900.8	15/9	3,167.9
H	96.0	2	192.0
	49,473.5		46,356.4
Less Council Tax support (Band D equivalents)			3,277.4
Less adjustment for collection rates and for anticipated changes during the year for successful appeals against valuation bandings, demolitions, disabled persons' relief, and exemptions, plus adjustments for new properties and 2 nd homes (this amounts to 1% of the tax base)			430.8
Council Tax Base for 2019/20			42,648.2

(ii). PRECEPTS & DEMANDS

	2019/20 £'000	2018/19 £'000
Gloucestershire County Council	55,174	51,439
Cheltenham Borough Council	8,917	8,475
Gloucestershire Police & Crime Commissioner	10,683	9,455
Charlton Kings Parish Council	108	84
Leckhampton with Warden Hill Parish Council	64	63
Prestbury Parish Council	68	66
Swindon Parish Council	12	11
Up Hatherley Parish Council	26	25
	75,052	69,618

In practice the council precepts for its own requirements and for the parishes. The parishes' requirements are in turn paid out of the council's General Fund.

(iii). NON-DOMESTIC RATES

The council collects non-domestic rates for its area based on business rateable values (as assessed by the Valuation Office) multiplied by a uniform rate set by the government. Certain reliefs are available and the figure shown is net of these reliefs.

From 1st April 2013 the Local Government Finance Act 2012 introduced a business rates retention scheme that enables local authorities' general funds to retain a proportion of the business rates generated in their area, subject to their general funds paying a 'Tariff' payment to the government if the amount exceeds a 'baseline funding' level or receiving of a 'Top-up' if it is below the funding level.

Normally district councils such as Cheltenham receive 40%, county councils 10% and central government 50% of business rates collectable, with write offs, provision for impairment of debts and any surplus or deficit generated being shared in the same proportions. If growth exceeds a certain threshold then the council's general fund must pay a 'levy' to central government on the extra growth, or if the rates collectable fall below a certain amount the council receives a 'safety net' payment from the government.

The council is, however, a member of the Gloucestershire Business Rates Pool, in which any levy payment or safety receipt is 'pooled' across several authorities. This enables each pool member to benefit from a lower levy rate payable should the growth in its business rates exceed its levy threshold, whilst receiving from the pool a safety net payment should its rates fall below its safety net threshold, contributed by the pool members. In 2018/19 the Pool operated as a 100% Pilot, whereby the districts received 50% and the County Council 50% of business rates collectable with a Nil levy payable to the government on growth. In 2019/20 the Pool reverted to the previous 40:10:50 shares system.

The total non-domestic rateable value at 31st March 2020 was £134.807 million (£135.442 million at 31st March 2019) and the national non-domestic multipliers for 2019/20 were 50.4p (49.3p in 2018/19) (standard rate) and 49.10 (48.0p in 2018/19) (small business rate).

(iv). FUND BALANCE

The fund balance for council tax is shared between the council and its major precepting authorities (Gloucestershire County Council and the Gloucestershire Police & Crime Commissioner), in proportion to their precepts. The fund balance for non-domestic rates is shared between the council, Gloucestershire County Council and central government, in the statutory proportions.

The respective authorities' share of the balance is as follows:

	Borough Council share £'000	County Council share £'000	Police share £'000	Central Government share £'000	Total £'000
Council Tax					
Balance at 1 st April 2019	110	646	119	-	875
Increase/decrease (-) in the year	(52)	(299)	(51)	-	(402)
Balance at 31st March 2020	58	347	68	-	473
Business Rates					
Balance at 1 st April 2019	(528)	(584)	-	91	(1,021)
Increase/decrease (-) in the year	(177)	90	-	(443)	(530)
Balance at 31st March 2020	(705)	(494)	-	(352)	(1,551)
Fund Balance at 31st March 2020	(647)	(147)	68	(352)	(1,078)

GROUP ACCOUNTS

The Group Accounts bring together the council's accounts with its share of those of:

- Cheltenham Borough Homes Limited (CBH), a company limited by guarantee, in which the council is the sole member, and
- Gloucestershire Airport Limited, in which the council has a 50% shareholding (the remaining 50% of shares are owned by Gloucester City Council).

The purpose of the Group Accounts is to show the full value of the council's investments in companies within the financial statements, since the council's shareholdings may not fully reflect its actual share of the companies' assets and liabilities.

Cheltenham Borough Homes Limited has been categorised as a subsidiary company of Cheltenham Borough Council and its interests have been consolidated in accordance with IAS 27 and IFRS10, which require income and expenditure, assets and liabilities to be consolidated with the council's accounts on a line-by-line basis, eliminating inter-organisational transactions and balances. The operating income and expenditure of the company has been included within the local authority housing line in the Group Comprehensive Income and Expenditure Statement, before the net cost of services.

Gloucestershire Airport Limited has been categorised as a Joint Venture as any decisions regarding its operating and financial policies require the consent of another party in addition to the council (the company is 'jointly controlled'). The company's assets and liabilities have therefore been consolidated with the council's in accordance with IAS 28 and IFRS11, which require the Equity Method to be used. Under this method, the council's share of the operating results of the company before tax is reported as a separate line, after the net surplus or deficit on the provision of services, within the Group Comprehensive Income and Expenditure Statement. Any taxation payable is also disclosed as a separate line.

In the Group Balance Sheet the council's share of the joint venture's net assets are included as a long-term investment, matched by the council's share of the company's reserves, eliminating the share capital. There is no requirement to adjust for transactions incurred and balances held between the council and any joint venture companies.

STATEMENT OF ACCOUNTING POLICIES FOR THE GROUP ACCOUNTS

These are set out in note 1.30 on page 38.

GROUP COMPREHENSIVE INCOME AND EXPENDITURE STATEMENT

This statement shows the cost in the year of providing group services, in accordance with generally accepted accounting practices, rather than the amount to be funded from taxation. Authorities raise taxation to cover expenditure in accordance with regulations; and this may be different from the accounting cost. The taxation position is shown in the Group Movement in Reserves Statement.

2018/19			2019/20		
Gross expenditure	Gross income	Net expenditure	Gross expenditure	Gross income	Net expenditure
£'000	£'000	£'000	£'000	£'000	£'000
Continuing Operations					
1,385	(83)	1,302	2,047	(432)	1,615
7,443	(1,670)	5,773	8,775	(1,107)	7,668
30,476	(26,312)	4,164	27,849	(23,211)	4,638
22,862	(12,683)	10,179	22,051	(13,947)	8,104
17,589	(20,907)	(3,318)	21,028	(20,772)	256
79,755	(61,655)	18,100	81,750	(59,469)	22,281
652	(1,545)	(893)	719	(750)	(31)
7,249	(3,036)	4,213	15,786	(5,130)	10,656
24,373	(40,646)	(16,273)	19,629	(35,315)	(15,686)
112,029	(106,882)	5,147	117,884	(100,664)	17,220
	(70)	Share of (Surplus) or deficit of Joint Ventures			(568)
	49	Share of Tax expenses of Joint Ventures			257
	5,126	Group (Surplus) or Deficit			16,909
Items that will not be reclassified to the (Surplus) or Deficit on the provision of services					
(8,751)		(Surplus) or Deficit on revaluation of non-current assets (note 33)			(2,930)
7,935		Remeasurement of the net defined benefit liability /(asset)			(15,338)
112		Share of other comprehensive income and expenditure of Joint Ventures			(136)
	(704)	Other Comprehensive (Income) and Expenditure			(18,404)
	4,422	Total Comprehensive (Income) and Expenditure			(1,495)

The notes are shown on pages 21 – 88 and 97 - 102

GROUP BALANCE SHEET

This statement shows the value as at the balance sheet date of the assets and liabilities recognised by the group. The net assets of the group (assets less liabilities) are matched by reserves held. Reserves are reported in two categories. The first category of reserves are usable reserves i.e. those reserves that the group may use to provide services, subject to the need to maintain a prudent level of reserves and any statutory limitations on their use. The second category of reserves comprises those that the group is not able to use to provide services. This category includes reserves that hold unrealised gains and losses (for example the Revaluation Reserve), where amounts would only become available to provide services if the assets are sold, and reserves that hold timing differences.

31 March 2019	Note	31 March 2020
£'000		£'000
371,932 Property, Plant & Equipment	44	414,601
40,700 Heritage Assets	20	40,748
75,993 Investment Property	22	68,068
510 Intangible Assets		1,372
8,001 Long Term Investments	46	6,386
12,259 Investments in Joint Ventures	39	12,707
3,329 Long Term Debtors	46	4,434
512,724 Long Term Assets		548,316
8,123 Short term Investments	26	7,110
- Assets held for sale	25	60
100 Inventories		174
7,178 Short term Debtors	41	15,660
2,915 Cash and cash equivalents	42	21,420
18,316 Current assets		44,424
(598) Bank overdraft	42	-
(9,006) Short term borrowing	26	(70,095)
(13,621) Short term creditors	43	(16,131)
(476) Grants receipts in advance - capital	16	(2,287)
- Grants receipts in advance - revenue	16	(2,660)
(983) Provisions	30	(486)
(24,684) Current Liabilities		(91,659)
(651) Provisions	30	(1,000)
(111,965) Long term borrowing	26	(115,293)
(512) Grants receipts in advance - capital	16	(225)
(275) Grants receipts in advance - revenue	16	(275)
(68,916) Other long term liabilities	45	(58,756)
(182,319) Long term liabilities		(175,549)
324,037 Net Assets		325,532
(27,319) Usable Reserves	48	(22,274)
(296,718) Unusable Reserves	49	(303,258)
(324,037) Total Reserves		(325,532)

The notes are shown on pages 21 – 88 and 97 - 102

GROUP STATEMENT OF MOVEMENT IN RESERVES

This statement shows the movement in the year in the different reserves held by the group, analysed into 'usable reserves' (i.e. those that can be applied to fund expenditure or reduce local taxation) and unusable reserves. A breakdown of the Total Comprehensive Income & Expenditure line is shown in the Group Comprehensive Income and Expenditure Statement, where the group surplus or deficit line shows the true economic cost of providing the group's services.

	Total Authority Usable Reserves	Authority's share of Usable Reserves of subsidiaries and Joint Ventures	Total Group Usable Reserves	Total Authority Unusable Reserves	Authority's share of Unusable Reserves of subsidiaries and Joint Ventures	Total Group Unusable Reserves	Total Group Reserves
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Balance at 31 March 2018	32,118	(1,221)	30,897	288,639	8,923	297,562	328,459
Movement in Reserves during 2018/19							
Total comprehensive Income & (Expenditure)	(4,260)	(866)	(5,126)	5,129	(4,425)	704	(4,422)
Adjustments between company reserves (Note 48)	-	694	694	-	(694)	(694)	-
Adjustments between accounting basis and funding basis under regulations (Note 5)	854	-	854	(854)	-	(854)	-
Increase / (decrease) in 2018/19	(3,406)	(172)	(3,578)	4,275	(5,119)	(844)	(4,422)
Balance at 31 March 2019	28,712	(1,393)	27,319	292,914	3,804	296,718	324,037
Movement in Reserves during 2019/20							
Total comprehensive Income & (Expenditure)	(13,805)	(3,104)	(16,909)	13,181	5,223	18,404	1,495
Adjustments between company reserves (Note 48)	-	3,242	3,242	-	(3,242)	(3,242)	-
Adjustments between accounting basis and funding basis under regulations (Note 5)	8,622	-	8,622	(8,622)	-	(8,622)	-
Increase / (decrease) in 2019/20	(5,183)	138	(5,045)	4,559	1,981	6,540	1,495
Balance at 31 March 2020	23,529	(1,255)	22,274	297,473	5,785	303,258	325,532

The notes are shown on pages 21 – 88 and 97 – 102

GROUP CASH FLOW STATEMENT

The cash flow statement shows the changes in cash and cash equivalents of the group (excluding those of the joint venture Gloucestershire Airport Limited) during the reporting period. The statement shows how the group generates and uses cash by classifying cash flows as operating, investing and financing activities. Cash flows between the council/CBH Limited and the airport are included; cash flows between the council and CBH Limited are excluded.

2018/19 £'000		2019/20 £'000
5,052	Net (surplus) or deficit on the provision of services	15,993
(18,688)	Adjust net surplus or deficit on the provision of services for non-cash movements (note 50)	(28,971)
3,005	Adjust for items in the net surplus or deficit on the provision of services that are investing or financing activities	3,462
(10,631)	Cash (inflows) / outflows generated from operating activities	(9,516)
60,201	Investing activities (note 51)	54,257
(49,643)	Financing activities (note 52)	(63,844)
(73)	Net (increase) / decrease in cash and cash equivalents	(19,103)
2,244	Cash and cash equivalents at beginning of the year	2,317
2,317	Cash and cash equivalents at end of the year (note 42)	21,420
73	Net increase / (decrease) in cash and cash equivalents	19,103

The notes are shown on pages 21 – 88 and 97 - 102

NOTES TO THE GROUP ACCOUNTS

These notes follow on from those of the council's single entity accounts above, since many of these are also applicable to the group accounts. Notes that are unique to the group accounts are shown below.

38. Cheltenham Borough Homes Limited

Cheltenham Borough Homes Limited (CBH) is a company limited by guarantee and is governed by its memorandum and articles of association. The liability in respect of the guarantee is set out in the memorandum of association and is limited to £1 per member of the company, the sole member being Cheltenham Borough Council. The company commenced operations on 1st April 2003, with a seven year contract to manage and maintain the council's social housing stock. The contract was renewed on 1st April 2010 for a further ten years. This was replaced by a new 30 year contract from 1st April 2015. The registered name of the company is Cheltenham Borough Homes Limited (Registration No. 04587658).

During 2010/11 the company commenced the construction of new rented housing stock to be owned and managed by the company. To facilitate this process the company set up a wholly owned subsidiary during 2009/10, the registered name of which is Cheltenham Borough Homes Services Limited (CBHS Limited) (Registration No. 07118944). The principal activity of CBHS is the supply of construction services to CBH.

The audited group accounts for CBH Limited (including CBHS Limited) show net liabilities at 31st March 2020 of £5.259 million (£8.158 million at 31st March 2019) and an after tax deficit of £2.188 million in the year to 31st March 2020 (£1.394 million in the year to 31st March 2019).

The net liabilities of the company are valued at cost (in accordance with company accounting rules) and may not therefore reflect their market value. The accounts of the company show a contingent liability of £38,039 at 31st March 2020 (£38,039 at 31st March 2019).

Since CBH's accounts show non-current assets at historic cost, the company's dwellings were re-valued at 31st March 2019 at Current value to bring them into line with the council's accounting policies. The Current value was assessed by internal and external valuers using the existing use value for social housing (EUV-SH) appropriate to the dwellings' tenure as affordable homes. There were no additions or disposals during the year. If CBH charged depreciation on the Current value of the dwellings, instead of their historic cost, the charge would be around £90,000 less.

The full accounts of Cheltenham Borough Homes Limited and Cheltenham Borough Homes Services Limited for the year ending 31st March 2020 can be obtained from the Company Secretary at the company's registered office – Cheltenham House, Clarence Street, Cheltenham, Gloucestershire, GL50 3JR.

39. Gloucestershire Airport Limited

Gloucestershire Airport Limited is a wholly owned local authority airport company which was voluntarily established during 1992/93 by Cheltenham Borough Council and Gloucester City Council, using powers available to them under the Airports Act 1986. This replaced the previous joint committee arrangements. The shares allotted were divided equally between the two councils. The market value of the shares is unknown as they are not listed, however their current fair value has been estimated and is included in the council's single entity accounts under long term investments: financial assets at fair value through other comprehensive income.

The registered name of the airport company is Gloucestershire Airport Limited (Registration No. 02774189). The draft accounts of the company show net assets at 31st March 2020 of £25.414 million (£24.517 million at 31st March 2019), and an after tax profit of £0.623 million for the year to 31st March 2020 (£0.043 million to 31st March 2019). The council's commitment to meet losses is limited to the shares that it holds.

The following table discloses the council's share of the airport's results and net assets.

	Gloucester- shire Airport Limited 2019/20 £'000	Council's share 2019/20 £'000	Gloucester- shire Airport Limited 2018/19 £'000	Council's share 2018/19 £'000
Turnover	4,730	2,365	4,896	2,448
Profit on ordinary activities before taxation	1,136	568	140	70
Less tax on profit on ordinary activities	513	256	97	48
Profit for the financial year after taxation	623	312	43	22

	31 March 2020 £'000	31 March 2020 £'000	31 March 2020 £'000	31 March 2020 £'000
Non-current Assets	34,751	17,375	33,756	16,878
Current Assets	820	410	865	432
Liabilities due within one year	(2,466)	(1,233)	(1,882)	(941)
Liabilities due after one year (excluding pensions)	(1,407)	(703)	(1,899)	(949)
Net Pension Liability	(1,326)	(663)	(1,941)	(970)
Deferred tax liabilities	(4,959)	(2,480)	(4,382)	(2,191)

The airport did not pay any dividends in the year to 31st March 2020 (nil to 31st March 2019).

During 2011/12 the council loaned £1.190 million to the airport towards the cost of the runway safety project, of which £0.383 million was outstanding at 31st March 2020. In addition the council provided the company with a temporary overdraft during 2019/20 of £0.600 million, which remained at 31st March 2020.

The Airport's accounts for the year ended 31st March 2020 can be obtained from the Managing Director at the company's registered office - The Terminal Building, Staverton, Cheltenham, Gloucestershire, GL51 6SR.

40. Publica Group (Support) Limited

The council has a significant interest in this company, the results for which are not included in the Group Accounts on the basis of immateriality. During 2019/20 the company generated a surplus of £16,124 (£91,274 in 2018/19) and had net assets at 31st March 2020 of £120,932 (£104,808 at 31st March 2019), of which the council's share is £4,031 and £30,233 respectively.

41. Short term debtors

These are as stated in note 27 to the single entity statements, with the addition of CBH debtors (excluding those with the council), which are sundry debtors.

42. Cash and Cash Equivalents

The balance of cash and cash equivalents is made up of the following elements:

	31st March 2020 £'000	31st March 2019 £'000
Cash held by the council and subsidiaries	6	6
Bank current accounts of the council and subsidiaries	2,419	164
Short term deposits and money market funds	18,995	2,745
Cash and cash equivalent assets	21,420	2,915
Cash and cash equivalent liabilities - bank overdraft	-	(598)
Net Cash and cash equivalents per Cash flow Statement	21,420	2,317

43. Short term Creditors

	31st March 2020 £'000	31st March 2019 £'000
Central Government Bodies	4,297	998
Other Local Authorities	1,153	3,962
Public corporations and trading funds	20	-
Other entities and individuals-		
- Council Taxpayers	123	99
- Business Ratepayers	1,833	2,442
- Ubico Limited	46	451
- Housing Rents	442	344
- Sundry Creditors	8,217	5,325
	16,131	13,621

STATEMENT OF ACCOUNTS 2019/20

44. Group Property, Plant & Equipment

2018/19 Restated*								2019/20								
Dwellings	Other Land and buildings	Vehicles, Plant and equipment	Infra-structure assets	Community assets	Surplus assets	Assets under construction	Total	Dwellings	Other Land and buildings	Vehicles, Plant and equipment	Infra-structure assets	Community assets	Surplus assets	Assets under construction	Total	
£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
206,271	131,761	6,287	12,438	146	2,992	4,538	364,433	Cost or valuation	217,473	137,810	6,692	14,004	148	5,312	1,251	382,690
7,708	7,813	1,644	1,419	2	-	1,460	20,046	At 1 April	12,668	97	2,263	218	-	39,600	1,800	56,646
3,303	(2,818)	-	-	-	1,651	-	2,136	Revaluation increases / (decreases) recognised in the Revaluation Reserve	(8,104)	4,960	-	-	-	146	-	(2,998)
382	(1,841)	-	-	-	-	-	(1,459)	Revaluation increases / (decreases) recognised in the surplus / deficit on the provision of services	(1,153)	(74)	-	-	-	(2,100)	-	(3,327)
(1,307)	-	(273)	-	-	-	-	(1,580)	Derecognition - disposals	(1,107)	-	(1,605)	-	-	-	-	(2,712)
-	-	(966)	-	-	-	-	(966)	Derecognition - other	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	Assets reclassified to/from held for resale	-	(60)	-	-	-	-	-	(60)
1,116	2,895	-	147	-	669	(4,747)	80	Other Reclassifications	(41)	-	(597)	-	-	(551)	529	(660)
217,473	137,810	6,692	14,004	148	5,312	1,251	382,690	At 31 March	219,736	142,733	6,753	14,222	148	42,407	3,580	419,969
-	(1,556)	(2,990)	(2,852)	-	(86)	(33)	(7,517)	Accumulated Depreciation and Impairment	(6)	(4,470)	(2,850)	(3,256)	-	(143)	(33)	(11,187)
(4,579)	(4,252)	(666)	(404)	-	(57)	-	(9,958)	At 1 April	(4,813)	(4,339)	(559)	(527)	-	(61)	-	(10,259)
4,573	1,172	-	-	-	80	-	5,825	Depreciation charge	4,806	1,273	-	-	-	-	-	6,079
-	86	-	-	-	-	-	86	Depreciation written out to the Revaluation Reserve	-	-	-	-	-	-	-	-
-	-	806	-	-	-	-	806	Depreciation written out to the surplus/ deficit on the provision of services	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	Derecognition - disposals	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	Derecognition - other	-	-	-	-	-	-	-	-
-	80	-	-	-	(80)	-	-	Other Reclassifications	-	-	-	-	-	-	-	-
(6)	(4,470)	(2,850)	(3,256)	-	(143)	(33)	(10,758)	At 31 March	(13)	(7,536)	(3,409)	(3,783)	-	(204)	(33)	(14,978)
217,467	133,340	3,842	10,748	148	5,169	1,218	371,932	Net Book Value at 31 March	219,723	135,197	3,344	10,439	148	42,203	3,547	414,601

45. Other Long term liabilities

These comprise the group pension fund liabilities of Cheltenham Borough Council and Cheltenham Borough Homes Limited (CBH). Further details of the council's liabilities are included in note 34 on pages 82 - 87 and for CBH in their accounts. These show a pension liability at 31st March 2020 of £7.449 million (£10.658 million at 31st March 2019).

46. Long term investments and Long term debtors

Long term investments differ from note 26 in the single entity accounts by the fair value of the shares in Gloucestershire Airport Limited, which is replaced in the group accounts by a long term investment in the Airport equivalent to a 50% share of the company's net assets, shown immediately below long term investments.

Long term debtors differ from note 26 in the single entity accounts by the elimination on consolidation of the loans to CBH Limited of £6.304 million.

47. Usable Reserves

These are detailed in the Group Movement in Reserves Statement.

48. Group Movements in the Movement in Reserves Statement

Adjustments are required between group usable and unusable reserves:

- for the receipt by CBH of social housing capital grants, which in the company accounts remain in the Income and Expenditure Reserve but in the group accounts are reversed out to the Capital Adjustment Account, as they have been used to finance newly constructed properties
- for the value of land donated to CBH by the council, which in the company accounts has been credited to Income and Expenditure Reserve but in the group accounts are eliminated as inter-organisational transactions within the Capital Adjustment Account
- for revaluation gains or losses arising from the difference between the cost of CBH properties shown in the company accounts and their existing use for social housing value (EU-SH) included in the Group Balance Sheet.

49. Unusable Reserves

	31st March 2020 £'000	31st March 2019 £'000
Revaluation Reserve	168,945	169,416
Capital Adjustment Account	192,729	199,560
Financial Instruments Adjustment Account	(1,601)	(1,747)
Financial Instruments Revaluation Reserve	(166)	(166)
Pooled Funds Adjustment Account	(1,050)	(178)
Collection Fund Adjustment Account	(647)	(419)
Pensions Reserve	(58,756)	(72,578)
Deferred Capital Receipts Reserve	3,926	2,952
Accumulating Compensated Absences Adjustment Account	(122)	(122)
Total Unusable Reserves	303,258	296,718

50. Cash Flow Statement – Operating Activities

The cash flows for operating activities include the following items:

	2019/20 £'000	2018/19 £'000
Interest received	(513)	(499)
Interest paid	3,986	3,049

The surplus or deficit on the provision of services has been adjusted for the following non-cash movements:

	2019/20 £'000	2018/19 £'000
Depreciation	(10,297)	(10,044)
Impairment and downward valuations	(2,100)	(1,418)
Amortisations	(200)	(166)
Increase (-) / decrease in creditors	(7,001)	1,827
Increase / decrease (-) in debtors	7,612	(760)
Increase / decrease (-) in inventories (stock)	74	35
Movement in pensions	(4,902)	(3,873)
Carrying amount of non-current assets sold or derecognised	(2,712)	(1,461)
Other non cash items charged to the net surplus or deficit on the provision of services	(9,445)	(2,828)
	(28,971)	(18,688)

51. Cash Flow Statement – Investing Activities

	2019/20 £'000	2018/19 £'000
Purchase of property, plant and equipment, investment property and intangible assets	58,457	62,665
Purchase of Investments	11,604	17,325
Proceeds from the sale of property, plant and equipment, investment property and intangible assets	(2,488)	(3,529)
Proceeds from the sale of short and long term investments	(13,023)	(16,007)
Other receipts from investing activities	(293)	(253)
Net cashflows from investing activities	54,257	60,201

52. Cash Flow Statement – Financing activities

	2019/20 £'000	2018/19 £'000
Cash receipts of short and long term borrowing	(265,001)	(189,867)
Other receipts for financing activities	513	(1,134)
Repayments of short and long term borrowing	200,644	141,358
Net cash flows from financing activities	(63,844)	(49,643)

HOUSING REVENUE ACCOUNT INCOME AND EXPENDITURE STATEMENT

The Housing Revenue Account (HRA) reflects a statutory obligation to keep a separate revenue account for the provision and maintenance of council owned houses and flats. The HRA Income and Expenditure Statement shows the cost in the year of providing these housing services.

	2019/20	2018/19
	£'000	£'000
Expenditure		
Repairs and Maintenance	3,989	3,864
Supervision and Management	7,531	7,233
Rents, Rates, Taxes and Other Charges	60	63
Depreciation and Impairment of Non-current Assets	5,576	4,777
Debt Management Costs	85	82
Movement in Bad Debts	157	129
Total Expenditure	17,398	16,148
Income		
Dwelling Rents	(18,506)	(18,555)
Non-dwelling Rents	(499)	(487)
Charges for services and facilities	(558)	(554)
Contributions towards expenditure	(603)	(533)
Other Income	(2)	(35)
Total Income	(20,168)	(20,164)
Net cost of HRA services as included in the Comprehensive Income and Expenditure Statement	(2,770)	(4,016)
HRA share of Corporate and Democratic core	155	152
Net cost of HRA Services	(2,615)	(3,864)
HRA Share of the operating income and expenditure included in the Comprehensive Income and Expenditure Statement:		
Gain on sale of HRA Non-current Assets	(734)	(1,530)
Interest Payable and Similar Charges	1,748	1,698
Interest and Investment Income	(107)	(169)
Capital Grants and Contributions Receivable	(675)	(244)
Surplus for the Year on HRA Services	(2,383)	(4,109)

MOVEMENT ON THE HRA STATEMENT

This statement shows how the surplus or deficit on the HRA Income and Expenditure Statement reconciles to the movement in the Housing Revenue Account Balance, which is governed by statute.

	2019/20 £'000	2018/19 £'000
Balance on the HRA at the end of the previous year	8,825	8,601
Surplus for the year on the HRA Income and Expenditure Statement	2,383	4,109
Adjustments between accounting basis and funding basis under statute (note 1)	(4,139)	(3,885)
Increase / (decrease) on the HRA	(1,756)	224
Balance on the HRA at the end of the current year	7,069	8,825

NOTES TO THE HRA STATEMENTS**1. Adjustments between accounting and funding basis under the legislative framework**

	2019/20 £'000	2018/19 £'000
Items included in the HRA Income and Expenditure Account but excluded from the Movement in the HRA Balance		
Capital contributions applied	(675)	(244)
(Gain)/loss on sale of HRA non-current assets	(734)	(1,530)
Movements in the fair value of assets	640	28
	(769)	(1,746)
Items not included in the HRA Income and Expenditure Account but included in the Movement in the HRA Balance		
Capital expenditure funded by the HRA	(3,370)	(2,139)
Net adjustments between accounting basis and funding basis under the regulations	(4,139)	(3,885)

2. Housing Stock

An analysis of the number and types of dwellings is detailed below:

Type	Total at 1st April 2019	Additions	Sales	Demolitions	Total at 31st March 2020
Houses and Bungalows	2,100	10	10	3	2,097
Flats	2,362	17	10	-	2,369
Shared Ownership (flats)*	16	-	1	-	15
Total Stock	4,478	27	21	3	4,481

*Council share of shared ownership properties.

3. HRA Non-Current Assets

The non-current assets included in the Balance Sheet that relate to the HRA are shown below:

	1st April 2019 Restated* £'000	Revaluations/ Impairments £'000	Additions £'000	Reclass- ifications £'000	Disposals £'000	Depreci- ation £'000	31 st March 2020 £'000
Dwellings	209,644	(3,497)	12,668	(41)	(1,108)	(4,606)	213,060
Assets under construction	1,155	-	1,641	592	-	-	3,388
Garages*	2,150	123	27	-	-	(33)	2,267
Other land and Buildings**	1,740	430	-	-	-	(25)	2,145
Infrastructure	5,475	-	192	-	-	(264)	5,403
Surplus assets	2,040	(274)	11,495	(551)	-	(5)	12,705
Investment property	1,896	-	-	-	-	-	1,896
Equipment	22	-	-	-	-	(3)	19
Intangible Assets	13	(2)	-	-	-	-	11
Total non-current assets	224,135	(3,220)	26,023	-	(1,108)	(4,936)	240,894

*Garages are included in Other Land & Buildings on the Balance Sheet.

**Restated to exclude depreciation reclassified as General Fund

4. Impairment and Revaluation of Non-Current Assets

HRA dwellings are revalued every five years (the last revaluation was undertaken as at 31st March 2020). In interim years the dwelling valuation is updated by the movement in the house price index for Cheltenham published by the Land Registry. The valuation is at Existing Use Value for Social Housing (EUV-SH) or market value (MV) adjusted by a factor to reflect the fact that the properties are socially rented. The adjustment factor is published by the Department for Communities and Local Government and is set regionally. The south west adjustment factor is currently 35% of Market Value.

5. Dwellings Valuation

The vacant possession value of dwellings within the HRA (i.e. their value without secure tenants) at 1st April 2020 was £608,742,860.

The difference between the vacant possession value and the lower Balance Sheet valuation (existing use value for social housing (EUH-SH)) measures the economic cost of providing council housing at less than open market rents.

6. Major Repairs Reserve

An analysis of the movements on the reserve during the year is shown below:

	£'000
Balance 1st April 2019	-
Transfer to reserve	4,936
Financing of HRA capital expenditure	(4,936)
Balance 31st March 2020	-

7. HRA Capital Expenditure

A summary of HRA capital expenditure and sources of finance for 2019/20 is shown below:

Category	Total Expenditure £'000	Sources of Finance						
		Major Repairs Reserve £'000	Capital Receipts £'000	Capital Contributions £'000	Revenue £'000	Grants £'000	Commutated Sums £'000	Borrowing £'000
New Build	1,641	-	(104)	-	221	154	-	1,370
Acquisitions	4,045	-	1,127	-	-	-	288	2,630
Major repairs & improvements	8,623	4,909	321	233	3,149	11	-	-
Garages	27	27	-	-	-	-	-	-
Infrastructure	192	-	203	(11)	-	-	-	-
Land	11,495	-	-	-	-	-	-	11,495
Total	26,023	4,936	1,547	222	3,370	165	288	15,495

8. HRA Capital Receipts

An analysis of HRA capital receipts realised during the year is shown below:

	2019/20 £000	2018/19 £000
Sales of Dwellings	1,709	2,557
Sales of Land	-	-
Sales of Investment Property	-	222
Mortgage Principal	2	3
Sale of Shared Ownership Flats	149	70
Total	1,860	2,852

9. Rent Arrears

Rent arrears at 31st March 2020 amounted to £824,906 (£659,815 as at 31st March 2019) and the Balance Sheet includes a bad debt provision of £402,000 relating to those arrears (£421,000 as at 31st March 2019).

10. Interest and Investment Income

This includes £106,865 interest from notional cash balances and mortgage interest of £170 (£167,590 and £232 respectively in 2018/19).

GLOSSARY OF FINANCIAL TERMS

Accounting Code of Practice	Although the preparation and control of accounting is regulated, there is no statutory basis for accounting entries. Instead, Local Authorities have to comply with the CIPFA/LASAAC Code of Practice on Local authority accounting in the United Kingdom (The Code).
Accounting Period	The period of time covered by the accounts, normally a period of twelve months commencing on 1 st April for local authority accounts. The end of the accounting period is the balance sheet date.
Accounts	A generic term for statements setting out details of income and expenditure or assets and liabilities or both, in a structured manner. Accounts may be categorised either by the type of transactions they record, e.g. revenue account, capital account or by the purpose they serve, e.g. management accounts, final accounts, balance sheets.
Accounting Policies	The principles, bases, conventions, rules and practices applied by an organisation that specify how the effects of transactions and other events are to be reflected in its financial statements.
Accruals	Sums included in the final accounts to cover income or expenditure attributable to the accounting period but for which payment has not been made/received at the balance sheet date.
Actual	Actual, as opposed to budget, expenditure and income directly attributable to an accounting period.
Actuarial Basis	The estimation technique applied when estimating the liabilities to be recognised for defined benefit pension schemes in the financial statements of an organisation.
Amortised cost	Financial instruments are shown on the balance sheet at amortised cost, being the principal amount of the loan plus or minus the balance of any premium or discount associated with that loan, plus any interest accrued at the balance sheet date.
Audit of Accounts	An audit is an examination by an independent expert of an organisation's financial affairs to check that the relevant legal obligations and codes of practice have been followed.
Balances	Working balances are reserves needed to finance expenditure in advance of income from debtors, precepts and grants. Any excess may be applied, at the discretion of the council, to reduce future demands on the Collection Fund or to meet unexpected costs during the year. Balances on holding accounts and provisions are available to meet expenditure in future years without having adverse effect on revenue expenditure.
Billing Authority	The authority that sets council tax and collects it from council tax payers.
Budget	A financial plan that expresses an organisation's service delivery plans and capital programmes in monetary terms.
Budget Strategy	A document setting out how an organisation is going to meet its policies and priorities, taking into account the resources available to the organisation. This will

include proposals for efficiency savings and possible service changes or reductions, which may free up resources for use on other policies or priorities.

Capital Expenditure	This is expenditure on items providing benefits to the organisation over more than one year, such as land, buildings or vehicles.
Capital Financing	The raising of money to finance capital expenditure. In the past the cost of capital assets was usually met by borrowing, but capital expenditure may also be financed by other means such as contributions from revenue accounts, the proceeds from the sale of capital assets, and capital grants and contributions from developers or others.
Capital Financing Requirement	The capital financing requirement measures the council's underlying need to borrow for capital purposes.
Capital Grants	Grants received towards capital expenditure on a specific service or project.
Capital Programme	This is a financial plan of the capital expenditure projects that the organisation intends to carry out over a specified time period.
Capital Receipt	This is income resulting from the sale of assets such as land or property. The Government decides what proportion of each capital receipt can be used by the council to finance new capital expenditure. Capital receipts cannot be used to fund revenue expenditure.
Cash & Cash equivalents	Cash in hand plus deposits in banks or building societies, repayable on demand or within 24 hours, and deposits maturing within 3 months of the date taken out.
CIPFA	The Chartered Institute of Public Finance and Accountancy. This is the professional body for accountants working in local government and other public bodies. The Institute provides financial and statistical information services for local government and advises central Government and other bodies on local government and public finance matters.
Collection Fund	This is a statutory fund kept separate from the main accounts of the council. It records all income due from Council Tax and National Non Domestic Rates and shows how that income was shared between central government, the County Council and the Police and Crime Commissioner.
Consistency	One of the fundamental accounting concepts, it requires accountants to treat similar items of income and expenditure in the same way both within an accounting period and from one accounting period to the next.
Contingent Asset	An asset which exists at the balance sheet date where the outcome will be confirmed only on the occurrence or non-occurrence of one or more uncertain future events, for example a claim for compensation that a council is pursuing through the due legal process, where the outcome will only be decided by the decision of the courts.
Contingent Liability	A liability which exists at the balance sheet date where the outcome will be confirmed only on the occurrence or non-occurrence of one or more uncertain future events, for example, the default by a borrower on a loan from a third party for which the council has given a guarantee.
Council Tax	A local tax levied on dwellings within the local authority area. The level of taxation is based on the capital value of the property, which is categorised into one of eight bands from A to H, and the number of people living in the dwelling.

Creditors	Amounts owed by the council for work done, goods received or services rendered within the accounting period, but for which payment was not made at the balance sheet date.
Current Assets	Assets which can be expected to be consumed or realised during the next accounting period.
Current Liabilities	Amounts which will become due or could be called upon during the next accounting period.
Debtors	An amount due to an organisation within the accounting period not received at the balance sheet date.
Depreciation	A charge made to the revenue account each year that reflects the reduction in value of assets used to deliver services. This is the loss in value of an asset, owing to age, wear and tear, deterioration, or obsolescence.
Employee Costs	These include salaries, wages and employers' national insurance and pension contributions, together with training expenses and charges relating to the index-linking of pensions of former employees.
Estimates	<p>Original estimate: the estimate for the new year approved before the start of the financial year, usually at the previous November's price levels.</p> <p>Revised estimate: the original estimate for the year updated by price changes since it was prepared and by supplementary estimates and virements.</p>
Final Accounts	Accounts prepared for an accounting period, usually in a summarised form. They include a statement showing the net surplus (profit) or deficit (loss) on the provision of services and a balance sheet. They are produced as a record of steward-ship for interested parties. Local authorities are required by the Accounts and Audit Regulations 1993 (as amended) to publish a Statement of Accounts at the end of each financial year.
Finance Lease	A lease that transfers substantially all of the risks and rewards of ownership of a non-current asset to the lessee (the person or organisation leasing the asset).
Financial Year	The local authority financial year commences on 1 st April and finishes on 31 st March in the following year.
Government Grants	Grants made by the Government towards either revenue or capital expenditure to help with the cost of providing services and capital projects. Some Government grants have restrictions on how they may be used, whilst others are general purpose.
Impairment	Impairment of an asset is caused by a consumption of economic benefits (e.g. physical damage such as an office fire) or a deterioration in the quality of service provided by the asset (e.g. an industrial unit closing and becoming a storage facility), or by a general fall in prices of that particular asset or class of assets.
Interest	An amount received or paid for the use of a sum of money when it is invested or borrowed.

International Financial Reporting Standards (IFRS)	Provide the required accounting treatment and disclosure of transactions so that an organisation's financial statements present fairly the financial position of the organisation.
Inventories	Items of raw materials and stores a council has purchased to use on a continuing basis but which have not yet been used.
Joint Venture	An entity in which the reporting authority has an interest on a long-term basis and is jointly controlled by the reporting authority and one or more entities under a contractual or other binding agreement.
Materiality	One of the main accounting concepts, it ensures that the statement of accounts includes all the transactions that, if omitted, would lead to a significant distortion of the financial position at the end of the accounting period.
Minimum Revenue Provision (MRP)	The minimum amount which must be charged to a council's revenue account as a contribution towards the reduction in its overall borrowing requirement. The amount represents that which the council considers to be prudent, taking into account the period over which the borrowing was taken, which is usually equivalent to the life of the asset.
National Non Domestic Rates (NNDR)	An NNDR rate (multiplier) is set annually by central government and is applied to the rateable value of a business to calculate the non-domestic rates collected by Billing Authorities. The rates collected are shared between central government, district and county councils in statutory proportions.
Non-Current Asset	Assets which can be expected to be of use or benefit to the council for more than one accounting period.
Operating Lease	A lease under which the ownership of the asset remains with the lessor (the person or organisation leasing the asset) and is equivalent to contract hiring.
Precepts	The levy made by a precepting authority (County Council, Police Authority, Parish Council) on the billing authority, requiring it to collect income from Council Taxpayers on their behalf.
Provision	A sum of money set aside in the accounts for liabilities or losses that are due but where the amount due or the timing of the payment is not known with certainty.
Revenue Expenditure	Expenditure on the day to day running costs of the council such as wages and salaries, utility costs, repairs and maintenance.
Revenue Expenditure funded from capital under statute (REFCUS)	Expenditure which can by law be financed from capital resources (e.g. capital receipts) but which does not result in a non-current asset for the authority e.g. renovation grants.
Revenue Support Grant	A general grant paid by central Government to local authorities to provide the services that it is responsible for delivering.
Subsidiary	An entity is a subsidiary of the reporting council if the council is able to exercise control over the operating and financial policies of the entity, and is able to gain benefits from the entity or is exposed to the risk of potential losses arising from this control.



CHELtenham
BOROUGH COUNCIL

**Annual Governance Statement
2019/20**

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1. Scope of Responsibility

Cheltenham Borough Authority (“the authority”) is responsible for ensuring that:

- Its business is conducted in accordance with the law and proper standards;
- Public money is safeguarded and properly accounted for
- Public money is used economically, efficiently and effectively; and
- There is a sound system of governance, incorporating the system of internal control and risk management

The authority has a Best Value duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

In discharging these responsibilities, the authority is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and including arrangements for the management of risk.

The authority has developed and approved a code of corporate governance, which is consistent with the core principles and sub-principles as set out in the CIPFA/SOLACE “Delivering Good Governance in Local Government: Framework (2016)” (‘the Framework’). This statement explains how the authority has complied with the code and also meets the requirements of Regulation 6(1)(a) of the Accounts and Audit Regulations 2015 (England) which requires the authority to conduct a review at least once a year on the effectiveness of its system of internal control and include a statement reporting on the review with any published Statement of Accounts.

In addition to this, CIPFA issued its “Statement on the Role of the Chief Finance Officer in Local Government (2015)”. The Annual Governance Statement (AGS) reflects compliance with that Statement for reporting purposes. The Executive Director Finance and Assets is the Statutory Section 151 Officer (S151 Officer) for Cheltenham Borough Council.

Please note the COVID-19 Pandemic lockdown commenced on 23 March 2020 affecting the final week of the councils operations. As it had minimal impact on our governance arrangements for 2019 – 20 the full impact of COVID-19 on governance arrangements will be reflected in our AGS for 2020-21.

2. Purpose of Governance Framework

The governance framework comprises the systems, processes, culture and values, by which the authority is directed and controlled including activities through which it is held accountable by, engages with and leads its communities. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services.

The system of internal control is a significant part of the governance framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an on-going process designed to:

- Identify and prioritise the risks to the achievement of the authority’s policies, aims and objectives;
- Evaluate the likelihood of those risks occurring;

- Assess the impact should those risks occur; and
- Manage the risks efficiently, effectively and economically

The governance framework has been in place at the authority for the year ended 31 March 2020 and up to the date of approval of the Annual Statement of Accounts.

3. Governance Environment

The key elements of the authority's governance arrangements are outlined in the Local Code of Corporate Governance. The governance framework includes arrangements for:

- Identifying and communicating the authority's vision of its purpose and intended outcomes for citizens and service users;
- Reviewing the authority's vision and its implications for the authority's governance arrangements;
- Measuring the quality of services for users, ensuring that they are delivered in accordance with the authority's objectives and ensuring that they represent the best use of resources;
- Defining and documenting the roles and responsibilities of the executive (Cabinet), non-executive, scrutiny and officer functions, with clear delegation arrangements and protocols for effective communication;
- Developing, communicating and embedding codes of conduct, defining the standards of behaviour for members and staff;
- Reviewing and updating Financial Rules, Contract Rules, Constitution, Scheme of Delegation and supporting procedure notes / manuals, which clearly define how decisions are taken and the processes and controls required to manage risks;
- Ensuring effective counter fraud and anti-corruption arrangements are developed and maintained;
- Ensuring the authority's financial management arrangements conform with the governance requirements of the *CIPFA* Statement on the Role of the Chief Financial Officer in Local Government (2015);
- Undertaking the core functions of an Audit Committee, as identified in *CIPFA's* Audit Committees: Practical Guidance for Local Authorities;
- Ensuring compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful;
- Whistleblowing referrals and for receiving and investigating complaints from the public;
- Identifying the development needs of members and senior officers in relation to their strategic roles, supported by the appropriate training;
- Establishing clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation; and
- Incorporating good governance arrangements in respect of partnerships, including shared services and other joint working and reflecting these in the authority's overall governance arrangements.

4. Principles

The main areas of the authority's governance framework, and the key evidence of delivery, are set out over the next pages under the headings of the core principles and sub-principles from the CIPFA/SOLACE "Delivering Good Governance in Local Government: Framework (2016).

Principle A

Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

- The roles and responsibilities of Members and all holders of an office are set out in the authority's Constitution. The Constitution also sets out how decisions are made and the procedures that are followed to ensure these are efficient, transparent and accountable to local people. The Constitution is supported and underpinned by a Code of Conduct for Members', Code of Conduct for Employees and a Protocol for Member/Officer Relations.
- The Code of Conduct for Members' requires declarations at meetings to be made by Members where necessary and these declarations are recorded in the minutes of the meeting. .
- The authority has a Standards Committee to maintain and promote high standards of conduct by observing and monitoring the operation of the Code of Conduct for Members'.
- Statutory Officers' responsibilities are defined in the Constitution and are employed in accordance with statutory guidance.
- Cheltenham Borough Council's constitution was reviewed and updated during 2019-20 to ensure it remained fit for purpose. Key changes included:
 - Reducing Planning Committee membership from 15 to 11 elected members with a quorum of 6 - following review of other planning committees across the UK to see if a smaller committee might increase the effectiveness of the decision-making process
 - Increase in the size of cabinet - The Cabinet shall consist of the Leader of the Council together with at least two, but not more than nine Councillors", allowing the introduction of two new portfolios for the climate emergency and the economic development in West Cheltenham.
 - The introduction of the electronic voting system - as an alternative to the show of hands currently required
 - Changes to procurement rules – following recommendations of the Constitution Working Group.
- The Executive Director Finance and Assets leads the promotion and delivery of good financial management through the Executive Leadership Team, attendance at Council, Cabinet and Committee meetings and organises specialist workshops/training for officers and Members as appropriate and as part of the member induction programme following borough elections every 2 years. Induction is

open to all members.

- Officer and Member decisions are recorded and published on the council website.
- Registers of interest are completed annually by Members and officers and a register of gifts and hospitality is maintained. Declarations of interest are declared and recorded at meetings.
- The Monitoring Officer and Executive Director Finance and Assets are members of the authority's Executive Leadership Team and meet with the Chief Executive to discuss any matters relevant to their statutory functions.
- Internal audit reviews are designed to ensure services are complying with internal and external policies and procedures / statutory legislation. Where non-compliance is identified, this is reported to management and to Members via the Audit Committee.
- Whistleblowing Policies have been updated and have been ratified by the Audit Committee.
- We work with a Gloucestershire wide Counter Fraud Unit to help prevent and detect fraud and corrupt practices, including abuse of position. The service reports to Audit Committee twice a year.

Principle B

Ensuring openness and comprehensive stakeholder engagement

- The annual accounts are published in a timely manner and in accordance with specified timescales so that the financial position and performance of the authority is open to public scrutiny.
- Committee meetings, agendas and minutes are published in accordance with the Forward Plan and publication of agendas is done in accordance with the Local Government Act 1972. Where statutory timescales are not met then the appropriate consultation takes place with the Chair of the Overview and Scrutiny Committee with regard to call-in. Council, Cabinet and Committee reports clearly outline their purpose, so the public can understand what the decision is aiming to achieve. Reports also address financial legal, equalities, risk and sustainability implications to aid Members in their decisions making.
- Members and the public are able to ask questions at Council, Cabinet and the Overview and Scrutiny Committee. Public questions can be asked at other committee meetings, e.g. Audit, Licensing and Planning. All meetings are held in public unless exempt business is under discussion.
- Members of the public are able to speak at Planning Committee.
- During 2019-20 webcasting of Council Meetings was introduced enabling our democratic processes to be accessible and open to all stakeholders.

- Overview and Scrutiny committee promotes open and transparent decision-making, democratic accountability and holds the Cabinet to account for its decisions.
- During 2019-20 an independent review was undertaken of the Overview and Scrutiny committee to ensure it continued to be effective. An action plan has been created to implement the recommendations
- As part of the budget setting process consultation takes place through the authority's website and by attendance at meetings of the parish councils and business community by the Executive Director Finance and Assets and Cabinet Member Finance / Leader of the Council.
- Engagement with staff happens in a number of ways; whole authority staff sessions, directorate team meetings, divisional team meetings, monthly managers meeting, one-to-one meetings, monthly #wearecbc newsletter with a foreword from a member of the Executive Leadership Team, etc. We also undertake regular staff surveys and exit interviews with staff who leave CBC.
- Outside the budget process, engagement and consultation with the public is undertaken through public meetings, surveys and other mechanisms as required throughout the year or around specific topics, e.g. Cheltenham Plan.
- During 2019-20 an independent resident survey was undertaken by a specialist market research agency BMG research.
 - **The survey was conducted during July and August 2019. The initial mailing of 5,500 questionnaires was followed after three weeks by a second copy of the questionnaire being sent to non-responding households, to encourage completion of the survey. At the end of the fieldwork period, 1,594 completed surveys had been received. This includes 234 sampled residents who completed the survey via the online option, rather than through the return of the paper survey. Therefore, the survey had a response rate of 29%, above the rate now typical in surveys of this type (20-25%).**
 - **A total of 5,500 postal addresses were randomly sampled across all Cheltenham wards. Residential addresses were randomly sampled using Royal Mail's Postal Address File (PAF), the most complete list of addresses that is available. This ensured all residents had an equal and fair chance of being selected for the survey. Within each ward, addresses were sorted by the Index of Multiple Deprivation (IMD) before applying the random sampling.**
 - **The report shows that overall 84% of Cheltenham residents are satisfied with their local area as a place to live. This score is higher than the Local Government Association (LGA) benchmark (80%) and the BMG urban authority benchmark (80%)**
 - **The full report has been published on the Council's website and the satisfaction figures have been added to the balanced scorecard as a performance measure baseline. The survey will be repeated in two to three years' time**
- A Statement on Community Involvement is approved which sets out the opportunities by which the public and organisations can engage with the planning system, including the procedures and methods used to

consult on planning applications. This is currently being reviewed and will be consulted on as soon as practicable.

- Performance against the corporate plan is monitored via Overview and Scrutiny and reported on an annual basis to Cabinet.
- During 2019-20, we have introduced an organisational performance management system called Clearview that will be used for monitoring performance and risk moving forward.
- Transparency data is published on the website and includes supplier payments, senior management structure charts, annual pay policy statement, and our gender pay gap report for the previous financial year. Where data is not available in the published data sets, instructions are available on how to make a Freedom of Information Request and the procedure that will be followed to answer the request.

Principle C

Defining outcomes in terms of sustainable economic, social, and environmental benefits

- The vision for Cheltenham is articulated in the Cheltenham Place Vision document. The vision sets out the ambitions, aspirations and actions that the authority, together with its key partners, will take to bring about a thriving town in terms of businesses and their workforces, culture and creativity, people and communities.
- The values contained within the vision for Cheltenham reflect the fact that sustainability is of central importance to how the ambitions for the town will be achieved.
- During 2019-20, a new Corporate Plan was completed. The three year corporate strategy sets out the authority's purpose, principles and priorities for the future. Guided by an agreed set of principles, with input from councillors, staff, and key partners, the priorities in the plan have been developed to make the biggest difference to Cheltenham's communities, businesses and residents, in line with Cheltenham's place vision that was agreed last year.
- Having adopted the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy the authority continues to develop and adopt its local plan that sets out the detailed plans for delivering sustainable, social and environment benefits across the Borough. Collectively the Joint Core Strategy and the Cheltenham Plan form the statutory development plan for Cheltenham. A review of the JCS is underway and Cheltenham continues to work collaboratively with its partners Tewkesbury Borough and Gloucester City on development plan formulation and its delivery.
- The Council's Cabinet formally declared a climate emergency on 9th July, 2019, following a request from Council and commissioned the consultancy firm 'De Courcy Alexander' (DCA) to produce a report

setting out the steps required to secure carbon neutrality for the Council and the Cheltenham borough by 2030.

- The report entitled 'Carbon Neutral Cheltenham – Leadership through Stewardship' was reported to and endorsed by Council on 14th October, 2019 and was subsequently considered by Cabinet on 5th November, 2019, which made the following resolutions, namely that:
 - the findings of the 'Carbon Neutral Cheltenham – Leadership through Stewardship' report and its associated roadmap be endorsed;
 - provision be made in the 2020-21 budget to deliver the 2030 roadmap (section 7 of the report);
 - resources needed to deliver the actions required to meet the 2030 carbon neutrality targets be considered, prioritised and identified;
 - an annual reporting process be developed to effectively track progress;
 - authority be delegated to the Executive Director People & Change and the Director of Environment, to develop the roadmap into a realistic action plan for project delivery, with appropriate business case development, taking account of the impact on the Council's financial position.
- All Cabinet and Council reports are now expected to include an environmental impact assessment setting out the likely carbon implications of any recommended actions.

Principle D

Determining the interventions necessary to optimise the achievement of the intended outcomes

- A mixed economy approach to service delivery is in place. In order to continue to deliver the priority outcomes of Members, and to operate within a more constrained financial cost base, the authority has over a number of years created a number of new organisations to deliver once in-house provided services.
- Each commissioned service is assigned a client officer who undertakes frequent and direct liaison with the service provider and monitors the contract performance and delivery. Each member of the Executive Leadership Team holds accountability for a commissioned service and provides the strategic guidance and support to the client officers. Executive Leadership Team and client officers keep relevant Cabinet members apprised of commissioned service performance as well as Cabinet Members being engaged directly in performance meetings with commissioned service providers.

- During 2019-20 the current Chief Executive retired and a new Chief executive was appointed through an open recruitment process. The new CE along with the rest of the Executive Leadership Team (ELT) continues to focus on place and growth, finance and assets and people and change. The ELT have both individual and collective accountability, working with Members, to deliver the Medium Term Financial Strategy (MTFS) and achieve financial sustainability.
- We continue to work on achieving the aims of our commercial strategy that sets out the authority's ambition to be an enterprising and commercially focused authority. During 2019 - 2020 Cheltenham Borough Council won both the MJ Award for Best Commercial Council as well the APSE Best Commercial and Entrepreneurship Initiative award. These rewards recognise the journey that CBC has made towards becoming financially sustainable. The purpose of this strategy is to drive down the Council's net costs and increase income via a commercial mind-set with the aim to hold down council tax as far as possible, now and in the longer term, while also protecting frontline services from cuts.
- The drive towards financial sustainability includes identifying new opportunities to generate income and investment in projects that provide good financial returns. The authority's commercial strategy aligns closely with other key strategies including place-making, economic growth, digital transformation, workforce and skills development, investment and asset management. The Council's commercial work is overseen by a commercial board that includes the Director of Finance and Assets and a cross section of the council's staff.
- The authority's budgets are prepared annually in accordance with objectives, strategies and the MTFS is finalised following consultation with Members, customers, stakeholders and officers.
- Financial stewardship in respect of both capital and revenue proposals is reviewed and challenged by the Budget Scrutiny Working Group and considered regularly by the Executive Leadership Team
- The MTFS is a live document and is updated as necessary, to respond to the changing environment and in such circumstances would be discussed by the Executive Leadership Team to determine any necessary mitigating actions that would then be discussed with the Cabinet.
- Processes are in place to identify and respond to external changes, for example: changes to legislation and regulation, emerging risks and opportunities, risk management, development and delivery of the corporate strategy, performance management, medium term financial planning, budget monitoring are designed to capture and incorporate external factors and to enable the authority to respond appropriately.
- Corporate risks are considered by Corporate Management Team (CMT) on a monthly basis and raised to ELT where necessary. Service risks are monitored and managed at directorate team level. Any risks scoring 16 or more are escalated to the corporate risk register.
- Corporate performance is reported as explained in section C above.

- ELT meets on a weekly basis to deal with matters of urgency or which require strategic oversight or decision making by ELT. CMT meets on a monthly basis to consider progress with corporate projects that are supported by their own governance arrangements. Any significant variances against expected time, cost, and quality would be discussed with the relevant cabinet member and appropriate action taken, within the approved budget and policy framework. Any matters requiring ELT overview/oversight/decision are escalated by the Executive Director People and Change who is a member of the CMT and who acts as a conduit between the two strategic groups.

Principle E

Developing the entity's capacity, including the capability of its leadership and the individuals within it

- Going forward, and as set out within the new corporate plan, our organisational change programme has been focusing on the modernisation of the authority, with staff having the necessary skills, behaviours and competencies to achieve the authority's future ambitions. Training undertaken during 2019-20 includes Commercial Awareness, Writing Better Business Cases, and Leadership Development. The council has also purchased a Learning Management System to enable all our compliance training, as well as other training, to be completed online.
- CBC's HR Action plan sets out the authority's organisational development needs and this continues to be rolled out supported by Publica's Human Resources and Development Team.
- To support the day-to-day delivery of services and the modernisation programme collaboration continues with Publica support services in the areas of Human Resources, Finance and ICT. The Executive Director People and Change is lead commissioner for HR and ICT and the Executive Director Finance and Assets is lead commissioner for Finance.
- All new employees take part in an induction programme and ongoing staff development needs are identified through the appraisal process and 1:1's. Appraisals continue to be undertaken online and a new approach to appraisal will be developed using the new Learning Management System over the next year. The Chief Executive is appraised by the Group Leaders.
- All new Members undertake a comprehensive Members induction programme that is delivered after each borough election (i.e. every 2 years). New Members are matched with a senior officer under a "buddy" system to provide practical support as they develop into their roles. Training is provided for Members on an ongoing basis as appropriate and necessary. Members on certain committees (e.g. Planning and Licensing) are required to undertake initial and ongoing "top up" training in order to take their place on the committee. The authority is a member of the Local Government Association who provide individual mentoring and support to Members and officers as necessary or requested.

Principle F**Managing risks and performance through robust internal control and strong public financial management**

- A corporate governance group meets on a quarterly basis, is chaired by the Executive Director of People and Change, and its attendees are the other statutory officers, plus internal audit, counter fraud, risk manager and HR.
- Officers are required to maintain Service / Operational Risk Registers and the CMT reviews the corporate risk register on a monthly basis that is then provided to informal cabinet.
- Any service level risks that score 16 or above are incorporated in the corporate risk register.
- The MTFS is reviewed and updated on a regular basis so that Members, ELT and CMT are aware of the financial standing of the authority in terms of delivering against cost reduction or revenue raising targets. Performance against budget is reported to Cabinet and any significant variances explained.
- The Statement of Accounts is produced and published annually in accordance with statutory legislation. Aligned with this is the production of this Annual Governance Statement that identifies how the authority has met its governance reporting obligations.
- External Audit recommendations are reported to Audit Committee following the completion of their annual audit process with follow-ups of recommendations also reported.
- Internal Audit is delivered through the South West Audit Partnership (SWAP) and processes ensure compliance with Public Sector Internal Auditing Standards. Internal Audit recommendations are followed up and reported to Audit Committee with further follow up reported where recommendations have not been actioned in full.
- Copies of all Internal Audit reports are provided to the Executive Director Finance and Assets who ensures that other relevant Executive Directors are made aware of any significant issues or recommendations.
- The Audit Committee reviews and approves the Risk Management Policy on an annual basis. Risks are identified when undertaking Internal Audit reviews and reported when necessary.
- A risk-based Audit Plan is drafted annually following consultation with Officers, Members and the Executive Director Finance and Assets. The Audit Plan is approved at Audit Committee prior to the financial year.
- Audit reports, once completed are discussed with the service manager. Executive summaries,

including findings, and progress on the Annual Plan are reported to Audit Committee, on a quarterly basis.

- Recommendations made in audit reports are followed up 6 months after the completion the audit and findings reported to Audit Committee.
- The authority's services are delivered through a mix of direct service delivery and delivery through other standalone organisations, e.g., Cheltenham Borough Homes, Ubico deliver environmental services including waste management, street cleansing and grounds maintenance; The Cheltenham Trust is responsible for the authority's town hall, Pittville Pump Room, Leisure@, Prince of Wales Stadium and The Wilson. Contracts and agreements are in place with each of these organisations that include performance management and reporting arrangements. Client officers monitor contractual requirements and performance measures.
- With effect from 1 April 2019, the Council brought in house all responsibilities and delegations from the Joint Waste Committee including the environmental services contract delivered by Ubico. A permanent Environmental Partnerships Manager has been appointed fulfilling the client manager function supported by a client officer (a total of 2 FTE's) along with a part-time programme manager to support delivery of the improvement programme for key priority 3 and communications to deliver behavior change. The Council is yet to formalise membership of the non-statutory Gloucestershire Resources and Waste Partnership that will replace the Joint Waste Committee.
- Organisational performance against the authority's corporate plan objectives is reviewed by the Corporate Management Team and by the Overview and Scrutiny Committee on a quarterly basis and reported to Cabinet on an annual basis.
- A Counter Fraud Unit supports all the Gloucestershire Local Authorities, West Oxfordshire District Council and other third parties. Where investigations identify possible improvements to the internal control framework, the Counter Fraud Unit will liaise with the Internal Audit Team to ensure the improvements are followed up and implemented by Management.
- The Government adopted the EU General Data Protection Regulations (GDPR) and introduced the Data Protection Act 2018. This required the Council to undertake a wide range of compliance activity that was managed by a project team, these activities included the appointment of a Data Protection Officer, the authority's Borough Solicitor, reviewing all of the information that the authority holds, preparing document retention schedules and training every elected Member and employee.
- Our Data Protection Policy provides a framework for all other Information security and Information Management Policies all of which are available to all data users on the Councils intranet. It also provides the responsibilities and accountabilities for the roles of the Data Protection Officer, Senior Information Risk Officer (SIRO) and the Single Point of Contact (SPoC).
- A range of training documentation is produced to support the training on Data Protection. Documentation is regularly reviewed and used to deliver an agreed annual training programme that includes induction for elected Members and employees.

- The Data Protection Project Board met through 2018/19 and the project sponsor and chair for this board is the Executive Director People and Change whose role includes the responsibilities of the (SIRO) as defined in the Data Protection Policy.
- The authority is part of the Gloucestershire Information Sharing Partnership. This will enable data to be shared when necessary.
- Audit reviews ensure data is held securely whether electronic or hard-copy.

Principle G

Implementing good practices in transparency, reporting, and audit to deliver effective accountability

- The authority publishes its performance in achieving delivery of its corporate plan objectives on an annual basis. Performance monitoring reports considered by Overview and Scrutiny are published on the authority's website in accordance with publication standards and guidelines.
- Data in respect of transparency is published on the authority's website.
- The Statement of Accounts is produced and published annually in accordance with statutory legislation. Aligned with this is the production of the Annual Governance Statement which identifies how the authority has met its governance reporting obligations
- External Audit recommendations are reported to Audit Committee, following the completion of their annual audit process, follow-ups of recommendations are also reported
- Internal Audit processes ensure compliance with Public Sector Internal Auditing Standards. Internal Audit recommendations are followed-up and reported to Audit Committee, further follow-up is planned if recommendations have not been actioned in full.

5. Review of Effectiveness

The authority has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the senior managers, the annual opinion from the Head of Internal Audit, the officer Corporate Governance Groups and comments made by the external auditors, other review agencies and inspectorates.

The authority's process for maintaining and reviewing the effectiveness of the governance framework

has included the following:

- Directors complete an Annual Assurance Statement at the end of each financial year. These governance declarations provide appropriate management assurance that key elements of the system of internal control are in place and are working effectively and help to identify areas for improvement.
- Annual Assurance Statements are also completed by Client Officers in respect of external service providers, The Cheltenham Trust, One Legal, Publica, Ubico and CBH.
- Where the assurance review highlights elements that do not fully or partially meet the systems of internal control then the Directors and Client officers explain what action needs to be taken within an agreed timeframe.
- CMT review the Corporate Risk Register on a monthly basis and service risk registers are managed by each manager.
- The SWAP Assistant Director (Head of Internal Audit) provides the Audit Committee, as the Committee charged with governance, with an Annual Opinion on the control environment of the authority, which includes its governance arrangements.
- Investigation of, and decisions on, allegations of failure to comply with Members Code of Conduct are considered and determined through processes involving the Monitoring Officer/Independent Person(s)/Standards Committee/Sub-Committee as set out in the Constitution.
- A full induction programme is delivered for newly elected members.
- The Executive Director Finance and Assets ensures training and awareness sessions are carried out for the Audit Committee periodically.
- The External Auditors (Grant Thornton) present progress reports to the Audit Committee. The Chief Executive and Executive Director Finance and Assets attend audit liaison meetings with the external auditors on a regular basis.
- The External Auditor's Annual Audit Letter and follow-up of management responses to issues raised in the Letter or other reports are overseen by the Audit Committee.
- Performance with regard to achievement of corporate priorities, budgets and risk are reported and monitored as outlined in this statement.
- The Audit Committee review the Annual Governance Statement.
- The Audit Committee review the Annual Statement of Accounts and reports from both Internal Audit (SWAP) and External Audit (Grant Thornton), including quarterly progress reports.
- Council approves the annual budget, reviews and approves the Treasury Management Strategy.
- Internal Audit monitors the quality and effectiveness of systems of internal control. Audit reports include an opinion that provides management with an independent judgement on the adequacy and

effectiveness of internal controls. Reports including recommendations for improvement are detailed in an action plan agreed with the relevant Executive Director/Service Manager.

The Head of Internal Audit states – ‘I have considered the balance of 2019/20 audit work, the assurance levels provided, the profile of each audit and outcomes, together with the response from Senior Management and am able to offer ‘**Reasonable Assurance**’ in respect of the areas reviewed during the year. Generally, risks are well managed, but some areas require the introduction or improvement of internal controls to ensure the achievement of objectives.

This opinion is however qualified, in light of the current coronavirus pandemic and the impact of this on Cheltenham Borough Council. The opinion given above is based on internal audit work undertaken, and completed, prior to emergency measures being implemented as a result of the pandemic. These measures have resulted in a significant level of strain being placed on normal procedures and control arrangements. The level of impact is also changing as the situation develops. It is therefore not possible to quantify the additional risk arising from the current short-term measures or the overall impact on the framework of governance, risk management and control.’

6. Significant Governance Issues During 2018/2019

In preparing 2018/19 AGS and reviewing the effectiveness of the governance arrangements no major issues were identified therefore no action plan was created.

7. Significant Governance Issues During 2019/2020

Internal have completed 34 reviews for Cheltenham Borough Council, including assurances over Publica’s control framework. The completed reviews consist of assurance pieces of work, follow-ups, advice and consultancy and non-opinions.

The majority of audits from the 2019/20 plan have been completed to final or draft report stage. The Covid-19 pandemic has inevitably caused some delay in progress due to availability of Officers dealing with service delivery priorities.

Where audits were in progress, or draft reports have been issued, we have not actively pursued these in the early phase of Covid-19 lockdown, however we are now working to finalise outstanding audits. These reports and assurances will be included in the 2020/21 Annual Opinion.

In preparing this 2019/2020 statement and reviewing the effectiveness of the governance arrangements a number of areas have been identified where the Council needs to focus attention and improve arrangements over the next financial year. These areas of work are planned to strengthen the control framework and are set out in the table below.

No	Key Area of Focus	Planned Actions	Lead officer
1	Clearview	Focus on full implementation of Risk, Organisational Performance and Project Management modules	Darren Knight
2	Procurement	Ensure there is capacity to undertake all procurements required by CBC	Gill Morris

3	Financial Rules Training	Develop module for Learning Management System	Ann Wolstencroft
4	Availability of Training Budgets	Consolidate training budgets and ensure they are available to support training requirements	Darren Knight / Paul Jones
5	The Cheltenham Trust manual financial processes as per audit recommendations	Processes to be reviewed.	Paul Jones
6	Impact of COVID19	Recovery Strategy	ELT / Darren Knight lead

8. Approval of Leader and Chief Executive

We have been advised on the implications of the result of the review of the effectiveness of the governance framework by the Audit Committee, and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework.

Signed on behalf of Cheltenham Borough Council:

Steve Jordan

Leader of the Authority

Date:

Gareth Edmundson

Chief Executive

Date:

Grant Thornton UK LLP
2 Glass Wharf
Temple Quay
Bristol
BS2 0EL

11 November 2020

Dear Sirs

Cheltenham Borough Council
Financial Statements for the year ended 31 March 2020

This representation letter is provided in connection with the audit of the financial statements of Cheltenham Borough Council, and its subsidiary undertakings, for the year ended 31 March 2020 for the purpose of expressing an opinion as to whether the group and Council financial statements are presented fairly, in all material respects in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 and applicable law.

We confirm that to the best of our knowledge and belief having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

Financial Statements

- i. We have fulfilled our responsibilities for the preparation of the group and Council's financial statements in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 ("the Code"); in particular the financial statements are fairly presented in accordance therewith.
- ii. We have complied with the requirements of all statutory directions affecting the group and Council and these matters have been appropriately reflected and disclosed in the financial statements.
- iii. The Council has complied with all aspects of contractual agreements that could have a material effect on the group and Council financial statements in the event of non-compliance. There has been no non-compliance with requirements of any regulatory authorities that could have a material effect on the financial statements in the event of non-compliance.
- iv. We acknowledge our responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.
- v. Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable. We are satisfied that the material judgements used in the preparation of the financial statements are soundly based, in accordance with the Code and adequately disclosed in the financial statements.
- vi. We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme assets and liabilities for IAS19 Employee Benefits disclosures are consistent with our knowledge. We confirm that all settlements and curtailments have been identified and properly accounted for. We also confirm that all significant post-employment benefits have been identified and properly accounted for.
- vii. Except as disclosed in the group and Council financial statements:

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- a. there are no unrecorded liabilities, actual or contingent
 - b. none of the assets of the [group and]Council has been assigned, pledged or mortgaged
 - c. there are no material prior year charges or credits, nor exceptional or non-recurring items requiring separate disclosure.
- viii. Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards and the Code.
- ix. All events subsequent to the date of the financial statements and for which International Financial Reporting Standards and the Code require adjustment or disclosure have been adjusted or disclosed.
- x. We have considered the adjusted misstatements, and misclassification and disclosures changes schedules included in your Audit Findings Report. The group and Council financial statements have been amended for these misstatements, misclassifications and disclosure changes and are free of material misstatements, including omissions.
- xi. Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards.
- xii. We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements.
- xiii. We have updated our going concern assessment and cashflow forecasts in light of the Covid-19 pandemic. We continue to believe that the group and Council's financial statements should be prepared on a going concern basis and have not identified any material uncertainties related to going concern on the grounds that current and future sources of funding or support will be more than adequate for the Council's needs. We believe that no further disclosures relating to the group and Council's ability to continue as a going concern need to be made in the financial statements

Information Provided

- xiv. We have provided you with:
 - a. access to all information of which we are aware that is relevant to the preparation of the group and Council's financial statements such as records, documentation and other matters;
 - b. additional information that you have requested from us for the purpose of your audit; and
 - c. access to persons within the Council via remote arrangements, in compliance with the nationally specified social distancing requirements established by the government in response to the Covid-19 pandemic. from whom you determined it necessary to obtain audit evidence.
- xv. We have communicated to you all deficiencies in internal control of which management is aware.
- xvi. All transactions have been recorded in the accounting records and are reflected in the financial statements.
- xvii. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- xviii. We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the group and Council, and involves:
 - a. management;
 - b. employees who have significant roles in internal control; or

- c. others where the fraud could have a material effect on the financial statements.
- xix. We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, analysts, regulators or others.
- xx. We have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.
- xxi. We have disclosed to you the identity of the group and Council's related parties and all the related party relationships and transactions of which we are aware.
- xxii. We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

Annual Governance Statement

- xxiii. We are satisfied that the Annual Governance Statement (AGS) fairly reflects the Council's risk assurance and governance framework and we confirm that we are not aware of any significant risks that are not disclosed within the AGS.

Narrative Report

- xxiv. The disclosures within the Narrative Report fairly reflect our understanding of the group and Council's financial and operating performance over the period covered by the financial statements.

Approval

The approval of this letter of representation was minuted by the Council's Audit, Compliance and Governance Committee at its meeting on 11 November 2020

Yours faithfully

Name.....

Position.....

Date.....

Name.....

Position.....

Date.....

Signed on behalf of the Council

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Cheltenham Borough Council
Audit, Compliance and Governance Committee – 11 November
2020

Internal Audit Plan 2020/21 and Progress Report

Accountable member	Cabinet Member Corporate Services, Councillor Alex Hegenbarth
Accountable officer	Paul Jones, Executive Director – Finance and Assets
Ward(s) affected	All
Key/Significant Decision	No
Executive summary	<p>The Council must ensure that it has sound systems of internal control that facilitate the effective management of all the Council's functions. The work delivered by SWAP Internal Audit Services (SWAP), the Council's internal audit service, is one of the control assurance sources available to the Audit, Compliance and Governance Committee, the Executive Leadership Team and Corporate Management Team and supports the work of the external auditor.</p> <p>The Annual Internal Audit Opinion presented to the Audit, Compliance and Governance Committee provides an overall assurance opinion at the end of the financial year. This Internal Audit Monitoring Report, however, is designed to give the Audit, Compliance and Governance Committee the opportunity to comment on the work completed by the partnership and provide 'through the year' comment and assurances on the control environment.</p>
Recommendations	The Audit, Compliance and Governance Committee approves the Audit Plan (Appendix A) and considers the monitoring report (Appendix B) and makes comment on its content as necessary
Financial implications	<p>There are no financial implications arising from the report</p> <p>Contact officers: Paul Jones, Executive Director – Finance and Assets Paul.Jones@cheltenham.gov.uk, 01242 264365</p>
Legal implications	<p>None specific arising from the report recommendation</p> <p>Contact officer: One Legal - legal.services@tewkesbury.gov.uk</p>
HR implications (including learning and organisational development)	<p>There are no specific HR implications arising from the content of the report. The HR Team continue to work closely with CBC and SWAP to ensure that any HR related recommendations from audits are actioned.</p> <p>Contact officer: Corry Ravenscroft, HR Business Manager Corry.Ravenscroft@publicagroup.uk, 01242 264355</p>
Key risks	That weaknesses in the control framework, identified by the audit activity, continue to threaten organisational objectives, if recommendations are not implemented.

Corporate and community plan Implications	<i>“Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.” (Chartered Institute of Internal Auditing UK and Ireland).</i> Therefore, the internal audit activity impacts on corporate and community plans.
Environmental and climate change implications	Relevant to particular audit assignments and will be identified within individual reports.
Property/Asset Implications	There are no specific Property/Asset Implications arising from the content of the report Contact officers: Paul Jones, Executive Director – Finance and Assets Paul.Jones@cheltenham.gov.uk , 01242 264365

1. Background

1.1 Internal Audit Plan

The primary role of Internal Audit is to provide assurance that the Council’s systems provide for a proper administration of its affairs. To this end, Internal Audit carries out a programme of audits that is agreed annually with the Council’s Management Team and the Audit, Compliance and Governance Purposes Committee. The Internal Audit service is provided to the Council by SWAP Internal Audit Services (SWAP).

In order to satisfy the requirements of the Public Sector Internal Audit Standards (PSIAS) and to reflect changes within the Council, SWAP needs to focus upon areas where the organisation now requires assurance. This reinforces the requirement for Internal Audit to follow a more flexible and risk-based plan.

The core financial systems delivered to the Council by Publica are covered within the Core Financials section of the Audit Plan. The scope of audits will include both Publica and client-side activities providing;

- Assurance to the client (Cheltenham Borough Council) over the controls, and system controls, operated by Publica Officers, for each financial module
- Periodic assurance over the other services provided by Publica.
- The required support to the External Auditor.

2. Reasons for recommendations

SWAP was due to present an internal audit plan covering 2020/21 to the Audit, Compliance and Governance Committee in March 2020. However, due to the COVID-19 outbreak and subsequent lockdown, this Committee was postponed.

Clearly a lot has changed since that date, and as such, an updated approach to internal audit work and planning has had to be implemented. The plan that had previously been prepared is likely to remain relevant in many respects, but the huge effort the Authority is undertaking in relation to response and recovery from COVID-19 is likely to push back a significant proportion of this work.

The report attached at **Appendix ‘A’** details how we have supported Cheltenham BC during quarter 1, the work we have undertaken and how we plan to undertake the audits included in the revised plan.

Internal Audit Output

- 3.1** The Internal Audit Service is provided to this Council through SWAP Internal Audit Services (SWAP). SWAP is a locally authority-controlled company.
- 3.2** The SWAP report attached at **Appendix 'B'**, sets out the work undertaken by SWAP for the Council since the Committee's last meeting. It follows the risk-based auditing principles, and, therefore, this is an opportunity for the Committee to be aware of emerging issues which have resulted in SWAP involvement.
- 3.3** Earlier in the year an External Quality Assessment (EQA) was undertaken for SWAP Internal Audit Services, this is to ensure SWAP conforms to the Public Sector Internal Audit Standards (PSIAS). The outcome of the assessment was that SWAP 'generally conforms'. Recommendations were made in the report for consideration by SWAP SLT. The report is attached at **Appendix 'C'** for information.
- 3.3** Officers from SWAP will be in attendance at the Committee meeting and will be available to address Members' questions.

Report author	Lucy Cater, Assistant Director, SWAP Internal Audit Services lucy.cater@swapaudit.co.uk 01285 623340
Appendices	A. Internal Audit Plan 2020/21 B. IA Progress Report C. EQA Report Summary

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Cheltenham Borough Council

Proposed Internal Audit Plan & Planning Approach 2020/21

Internal Audit Planning: A Revised Approach 2020/21

As a result of the COVID-19 pandemic, SWAP has had to adapt and change its focus in the short-term.

This has involved the redeployment of SWAP staff to assist the Authority with the response to the huge challenges faced.

With the Authority moving into a recovery phase from COVID-19, we are now looking to re-commence audit work in some areas and help to assist with recovery efforts.

Revised Approach to Internal Audit Planning 2020/21

SWAP was due to present an internal audit plan covering 2020/21 to the Audit, Compliance and Governance Committee on the 24th March 2020. However, due to the COVID-19 outbreak and subsequent lockdown, this Committee was postponed.

Clearly a lot has changed since that date, and as such, an updated approach to internal audit work and planning has had to be implemented. The plan that had previously been prepared is likely to remain relevant in many respects, but the huge effort the Authority is undertaking in relation to response and recovery from COVID-19 is likely to push back a significant proportion of this work. As such, we have briefly set out below our updated approach to Internal Audit Planning in 2020/21:

Quarter 1 – 2020/21

During quarter 1 we supported the Council by undertaking data input and verification work for the Business Grant administration process, we also analysed data in respect of the support given by the Council to vulnerable and shielding residents that had registered for help during the pandemic. We co-ordinated the Managers Assurance Statements process for inclusion in the Annual Governance Statement, reviewed policies for the CFU and provided continuous assurance reports in areas such as Accounts Payable and Accounts Receivable. During this period, we also finalised several 2019/2020 audits which had been delayed due to officer availability.

Quarter 2 – 2020/21

With the Authority moving into a recovery phase from COVID-19, we have commenced audit work in several areas and continue to assist with recovery efforts. However, we recognise there are still likely to be priority and capacity challenges in certain service areas, and as such Quarter 2 is likely to involve a hybrid approach in terms of supporting the Authority with recovery efforts, as well as internal audit assurance work.

Quarter 3 onwards – 2020/21

Dependent on any future re-emergence or residual COVID-19 challenges faced by the Authority, from Quarter 3 onwards we will look to fully re-align our audit plan focusing on the key corporate risks facing the Authority and providing assurance on the key financial systems.

Internal Audit Planning: A Revised Approach 2020/21

2020/21 will clearly present an exceptional year for the Authority (as well as SWAP).

The approach we take to our audit planning and work will need to remain flexible; looking to achieve a balance of supporting the Authority in response and recovery efforts, whilst maintaining our statutory internal audit role.

Revised Approach to Internal Audit Planning 2020/21 (continued)

It is the responsibility of the Authority's Senior Leadership Team, and the Audit, Compliance and Governance Committee, to determine that the audit coverage contained within the overall programme of work across 2020/21 is sufficient and appropriate in providing independent assurance against the key risks faced by the organisation (*set in the context of the unprecedented challenges faced by COVID-19*).

When reviewing the revised internal audit planning approach, key questions for SLT and the Audit, Compliance and Governance Committee to consider include:

- Does the revised planning approach achieve a proportionate balance between assisting the Authority with the unprecedented challenges it faces, whilst maintaining our statutory internal audit role and independence?
- Will the revised planning approach provide sufficient, independent assurance to monitor the organisation's risk profile effectively?

Further Planning detail

During the period that we have been working from home we have adopted, and implemented, new ways of working.

Firstly, we will be auditing more agilely when the audit allows it. We will audit areas as planned but these will be undertaken by a team rather than an individual. This will result in a more transparent audit process, with regular client involvement and visibility. It will also allow earlier insights and observations to be provided to clients.

Secondly, we have introduced continuous assurance reports. These are data audits and allow the reader to identify any anomalies / variances, which can be corrected in a timely manner.

Thirdly, and again where the audit allows for it, our audits will be data driven. We have a dedicated Data Analytics team who will extract and interpret data for inclusion within the audit.

Internal Audit Planning: A Revised Approach - Quarter 2 - 2020/21

Our documented risk assessment helps to ensure that sufficient and appropriate areas are identified for consideration in our internal audit programme of work.

As above, it is the responsibility of the Authority's Senior Leadership Team, and the Audit, Compliance and Governance Committee to ensure that, with consideration of our risk assessment, the overall programme of work throughout the year contains sufficient and appropriate coverage.

Internal Audit Risk Assessment (updated)

Our original 2020/21 internal audit programme of work was based on the documented risk assessment below.

We have now updated this to highlight key areas where we believe the risk profile has increased following the COVID-19 pandemic (included in **bold**), as well as any new risk areas (included in *italics*):



It should be noted that the audit titles and high-level scopes included below are only indicative at this stage for planning our resources. At the start of each audit, an initial discussion will be held to agree the specific Terms of Engagement for the piece of work, which includes the objective and scope for the review.

Areas of Coverage and Brief Scope	Senior Leadership Team Lead	Priority (H, M, L) and Proposed Timing (Earlier, Later)
Publica Transformation Benefits Realisation (audit deferred from 2019/20) <i>Provision made in the Audit Plan to enable IA to give assurance(s) to the Council in respect of Benefits Realisation for the Publica Transformation Programme.</i>	Executive Director – People and Change	Medium / Earlier
The Delivery of Services by Publica <i>Review to assess how the Council is getting assurance that Publica is delivering as per contracts / service level agreements. To include an assessment of metrics.</i>	Executive Director – People and Change	Medium / Later
Governance of Programmes and Projects <i>Review of the programme and project framework.</i>	Executive Director – People and Change	High / Later
Planning Enforcement <i>Request from A, C & G Committee to review an element of regulatory services on an annual basis. Scope to ensure the process is followed equally for all cases. Audit to be undertaken in conjunction with the 2019/20 planning application audit.</i>		Medium / Earlier
Asset Management and Commercial / Investment Property (audits deferred from 2019/20)	Executive Director – Finance and Assets	Medium / Earlier
Inclusivity and Diversity <i>Review to assess the Council's efforts to be externally (stakeholders / customers) inclusive and diverse.</i>	Executive Director – People and Change	Medium / Later
Authority's response to COVID-19 <i>Review to include assessment on the activation and effectiveness of the Council's Business Continuity Plan and the Council's involvement and support to emergency planning. Review to offer opinion on gains made and lessons learned.</i>	Executive Director – People and Change	High / Earlier
Continuous Assurance and Data Analytics – Key Financial Controls <i>A programme of regular assurance over the Authority's key financial controls</i>	Executive Director – Finance and Assets	Medium / Ongoing
Core Financials – Publica Controls and Transactional Testing <i>A review of the controls operating within Publica in respect of the Core Financial systems:</i> <ul style="list-style-type: none"> • Payroll • Accounts Payable (Creditors) 	Executive Director – Finance and Assets	Quarter 3

Internal Audit Planning: A Revised Approach 2020/21

<ul style="list-style-type: none"> • <i>Accounts Receivable (Debtors)</i> • <i>Treasury Management and Bank Reconciliations</i> • <i>Main Accounting, Capital Accounting and Budgetary Control (to include an element of Management and Monitoring on Contracts deferred from 2019/20)</i> <p><i>Depending on previous years audit assurances a high-level review may be deemed appropriate.</i></p> <p>Off Payroll Working (IR35) <i>Review to ensure compliance with HMRC's IR35 legislation, ensuring any changes made to legislation by HMRC have been actioned.</i></p> <p>Human Resources <i>A review of an element of the Human Resources (HR) service – Suggested area to be reviewed is the Recruitment Process.</i></p> <p>Other Publica Area <i>Review to be undertaken of either Procurement / Health and Safety / Insurance. Suggested area for review for 2020/21 is the Safety of Staff undertaking site visits (not planning officers). Review to include Personal Protective Equipment (PPE), Training and Treatment of Hazardous Waste.</i></p> <p>Revenues and Benefits <i>A review of the controls operating in respect of:</i></p> <ul style="list-style-type: none"> • <i>Council Tax</i> • <i>National Non-Domestic Rates</i> • <i>Housing Benefit and Council Tax Support</i> <p><i>The programme of activity ensures full coverage of the services over a 3-year cycle</i></p>		
<p>Risk Management <i>To review a specific element of the Council's Risk Management process – Suggested area is to review the Council's revised approach to risk management and the introduction of Clearview to manage risks.</i></p>	Executive Director – People and Change	Low / Later
<p>Performance Management <i>A review of an element of Performance Management – Suggested area to review is the Appraisal Process.</i></p>	Executive Director – People and Change	Low / Later
<p>Small Business Grant Fund and Retail, Hospitality and Leisure Grant Fund <i>Ongoing work providing assurance over the distribution of Government grants issued during the COVID-19 pandemic offering support to the CFU following submission of data to Spotlight and CIFAS</i></p>	Executive Director – Finance and Assets	Medium / Ongoing
<p>Governance Arrangements for Cyber Cheltenham <i>Assessment of the Governance Arrangements in respect of Cyber Cheltenham.</i></p>	Executive Director – Place and Environment Development	Medium / Ongoing

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Further requested assurance / advisory / support work, as required		High / Ongoing
Other Audit Involvement		
<p>Management <i>Preparation of IA Monitoring Reports and preparation and attendance at Audit, Compliance and Governance Committee. Annual Audit Planning. Attendance at Governance and Risk Groups. High level programme monitoring. Liaison meetings with CFOs and Management Teams.</i></p> <p>Follow-Up Audits <i>Follow-Up of Previous Year's recommendations. Follow-Up audit of all High Priority Recommendations. Follow-Up audit of Property - Use of Contractors (2019/20). Follow-Up audit of Systems Admin – ensuring outstanding recommendations have been actioned.</i></p> <p>Grant Certification <i>Review (income and expenditure) and certification of Disabled Facilities Grants and Additional Funding, ensuring finding requirements have been met.</i></p> <p>Working with the Counter Fraud Unit <i>Provision to ensure collaborative working with the CFU and to ensure control weaknesses, identified during CFU activity, are being actioned. Regular liaison meetings.</i></p> <p>Contingency <i>Provision for new work based on emerging risks and Investigations.</i></p>		
Reserve Audit Areas		
<p>Leisure and Culture Facilities <i>Review to determine how the Council ensures the leisure service provider(s) are adhering to statutory Health and Safety regulations. Review to test requested confirmations for tests such as fixed wire testing, fire alarm systems and emergency lighting tests.</i></p> <p>Property Related Health and Safety <i>Review to assess the Health and Safety arrangements at the Council's properties including confirmation of testing of Fixed Wire, Emergency Lighting and PAT testing.</i></p> <p>Use of Third-Party Workers <i>Review of the recruitment and on-going personnel management of agency / contractor / temporary / third-party workers who work at / on behalf of the Council. Are HR related considerations, processes and controls robust enough within individual service areas?</i></p>		

Internal Audit Planning: A Revised Approach 2020/21

<p>Climate Change <i>Review to assess what business areas are doing to support the Council's commitment to the Climate Emergency.</i></p> <p>CBC Lottery <i>Review to ensure monies / grants are awarded in accordance with policy / procedure, to include an assessment of applications.</i></p> <p>Marketing Cheltenham <i>Review to ensure the governance and accountability of Marketing Cheltenham are appropriate and transparent.</i></p> <p>CBC Lending Council <i>Review of the Council's involvement in the Folk2Folk scheme, to include agreements, repayment plans, interest calculations.</i></p>		

Cheltenham Borough Council

Report of Internal Audit Activity

November 2020

Contents

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At the conclusion of audit assignment work each review is awarded a “Control Assurance Definition”;

- No
- Limited
- Reasonable
- Substantial



Audit Framework Definitions

Control Assurance Definitions

No	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.
Limited	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
Reasonable	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Substantial	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

Non-Opinion – In addition to our opinion based work we will provide consultancy services. The “advice” offered by Internal Audit in its consultancy role may include risk analysis and evaluation, developing potential solutions to problems and providing controls assurance. Consultancy services from Internal Audit offer management the added benefit of being delivered by people with a good understanding of the overall risk, control and governance concerns and priorities of the organisation.

Recommendations are prioritised from 1 to 3 on how important they are to the service/area audited. These are not necessarily how important they are to the organisation at a corporate level.

Each audit covers key risks. For each audit a risk assessment is undertaken whereby with management risks for the review are assessed at the Corporate inherent level (the risk of exposure with no controls in place) and then once the audit is complete the Auditors assessment of the risk exposure at Corporate level after the control environment has been tested. All assessments are made against the risk appetite agreed by the SWAP Management Board.



Audit Framework Definitions

Categorisation of Recommendations

When making recommendations to Management it is important that they know how important the recommendation is to their service. There should be a clear distinction between how we evaluate the risks identified for the service but scored at a corporate level and the priority assigned to the recommendation. No timeframes have been applied to each Priority as implementation will depend on several factors; however, the definitions imply the importance.

	Categorisation of Recommendations
Priority 1	Findings that are fundamental to the integrity of the service's business processes and require the immediate attention of management.
Priority 2	Important findings that need to be resolved by management
Priority 3	Finding that requires attention.

Definitions of Risk

Risk	Reporting Implications
High	Issues that we consider need to be brought to the attention of both senior management and the Audit Committee.
Medium	Issues which should be addressed by management in their areas of responsibility.
Low	Issues of a minor nature or best practice where some improvement can be made.

Audit Plan Progress

APPENDIX B

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
2019/20 Audits in Draft / In Progress at Annual Opinion									
Key Financial Control	Accounts Receivable		Final Report	Reasonable	4		1	3	See Appendix C
Follow-Up	Procurement		Final Report	N/A	-				See Appendix C
Follow-Up	Procurement and Contract Management		Final Report	N/A	-				See Appendix C
Advisory	Planning Process and Complaints Procedure		Final Report	Advisory	2		2		See Appendix C
ICT	Business Continuity		Draft Report						
ICT	Incident Management		Draft Report						

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	

Audit Plan Progress

APPENDIX B

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
2020/21 Audit Plan									
Operational	Business Grant Funding		Complete	N/A	-				Support to the Council in respect of Data Input
Operational	Vulnerable and Shielding Residents		Complete	N/A	-				Data analysis conducted on support given by the Council to registered residents during the pandemic
Operational	Managers Assurance Statement		Complete	N/A	-				Co-ordination of Managers Assurance Statements
Advisory	CFU Policies		Complete	N/A	-				Reviewing policies held by CFU and advising of changes to legislation
Operational	Continuous Assurance Reports		On-Going						Accounts Payable, Accounts Receivable
Key Financial Control	Revenues and Benefits								
	• Council Tax and National Non-Domestic Rates		In Progress						
	• Housing and Council Tax Benefits		In Progress						
Key Financial Control	Core Financials								
	• Accounts Payable		In Progress						
	• Accounts Receivable								
	• Main Accounting								

Audit Plan Progress

APPENDIX B

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
	• Payroll		In Progress						
	• Treasury Management and Bank Reconciliation								
Key Financial Control	Systems Administration		In Progress						
Key Financial Control	Human Resources								
Key Financial Control	Other Support Service provided by Publica • Health and Safety (Of Staff)								
ICT	Cyber Security		Draft Report						
ICT	Use of Anti-Malware Software								
ICT	Automatic Back-Up of System Data								
Governance	Risk Management								
Governance	Performance Management								
Governance	Governance of Programmes and Projects								
Governance	Governance Arrangements for Cyber Cheltenham		In Progress						
Operational	Asset Management and Commercial / Investment Property		In Progress						
Operational	Planning Applications		In Progress						

Audit Plan Progress

APPENDIX B

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
Operational	Planning Enforcement		In Progress						
Operational	Post Payment Assurance – Small Business Grants								
Operational	Authority's Response to Covid-19								
Operational	Publica Transformation Benefits Realisation								
Operational	The Delivery of Services by Publica								
Operational	Inclusivity and Diversity								
Operational	Training Courses		Draft Position Statement						
Operational	Publica Support Costs Recharge Process & Internal Control Process for Contract Variations (NEW)		ToE Drafted						
Follow-Up	Follow-Ups of Recommendations made in Substantial and Reasonable Audits		On Going						
Follow-Up	Follow-Up of Control Weaknesses identified by the Counter Fraud Unit								
Follow-Up	Procurement								Further Follow-Up required

Audit Plan Progress

APPENDIX B

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
Follow-Up	Procurement and Contract Management								Further Follow-Up required
Grant Certification	Disabled Facilities Grants		Complete	N/A					
Grant Certification	Income Compensation Scheme (NEW)								
Other Audit Involvement	Working with the Counter Fraud Unit		On Going						
Other Audit Involvement	Management of the IA Function and Client Support		On Going						
Other Audit Involvement	Contingency – Provision for New Work based on emerging risks								

Audit Assignments finalised since the last Audit Committee:

● Summary of Audit Findings and High Priority Service Findings

The following information provides a brief summary of each audit review finalised since the last Committee update.

Accounts Receivable – Reasonable Assurance

Background

The Accounts Receivable (AR) audit is undertaken over a 3-year audit cycle whereby key controls are reviewed each year, and specific processes covered once during the 3 years. This year's focus is on the creation, production, and despatch of subscription invoices. Subscriptions can be set up so that invoices are generated on an annual, quarterly, or monthly basis. Generally, subscriptions are set up for income collection related to but not limited to licensing services, lease/rent arrangements, waste/refuse collections and Lifeline charges.

The AR Team is responsible for setting up all subscriptions within Business World (BW).

During our test period, October 2018 – September 2019, a total of 21,582 subscription invoices were generated across G1, G2, G3 and G4 clients of which 10,494 were raised for Cheltenham BC.

Audit Conclusion / Findings

Key control testing, which included reconciliation of the debtors control account, periodic review and action of aged debt and debt write off processes, was undertaken and found to be effectively controlled.

Testing undertaken on processes relating to the production of subscription invoices identified that, in the main controls were satisfactory, however there was a lack of evidence to support the subscription being set up on several debtor accounts. This was reported to AR (Accounts Receivable) when initial testing was undertaken in November 2019. We re-visited these accounts in late April 2020 and can confirm that supporting evidence was uploaded to the debtor account, but this was not the case for all in our test sample. If evidence is not available, in the event of challenge, AR may not be able to justify raising the debt. We were advised that AR can refer to the service area for supporting evidence if necessary.

Our testing to identify if any duplicate subscriptions existed found some duplicate subscriptions had been set up due to the service area providing AR with information that was subject to interpretation. Whilst we accept this is outside of AR control, it is equally

important that AR seek clarification to ensure the debtor database is adequately maintained. It would therefore be helpful if AR provide service areas with updated guidance. As part of providing continuous assurance, we have agreed to review potential duplicate subscriptions.

Other anomalies required further investigation by AR, and although explanation was provided, a lack of using the notes facility within the BW system meant that an audit trail was not available. To provide service resilience we have recommended that this facility be used by all members of the AR team.

We can confirm that the 2 recommendations made in last year's review are being implemented. We would add that all procedure notes/guidance documentation include version control to ensure guidance remains current.

Priority	Recommendation	Management Response	Due Date
2	Duplicate subscriptions should be reviewed, and appropriate corrections made. Any duplicate payments should be returned to the debtor.	All subscriptions will be corrected where applicable. Will discuss with team to ensure that prior to setting up new subscriptions a search for existing subscriptions is performed. If any queries arise the AR officer will refer to the service area for clarification. Responsible Officer – AR Team Leader	31/08/2020 Will be followed up in this year's review

Procurement and Contract Management – Follow-Up

Audit Conclusion / Findings

Progress has been made towards the implementation of two of the four recommendations made in the initial Procurement & Contract Management audit. These recommendations were focussed on promoting awareness of contract management requirements with contract owners and service managers and assisting in training and development of the skills needed to effectively monitor and manage contracts. To be delivered successfully, the implementation of these actions must be promoted and supported by senior management.

The initial action intended by the Publica Group Manager – Business Support Services is to arrange for a reminder of the need for contract management activities to be included on the CBC Intranet.

Following the change of procurement thresholds at CBC, mandatory training was carried out by the Procurement Team in partnership with One Legal and the Counter Fraud Unit. This training included an element of contract management, though it was not covered in detail.

The two recommendations that remain to be progressed are linked and relate to the update of the Procurement and Contract Management Strategy (2015). The update of the strategy in full is dependent on the Government issuing notification on the changes to Procurement legislation and practice post-Brexit.

The Senior Procurement Business Partner has therefore agreed to conduct an interim review of the strategy to ensure it is still relevant and up to date.

Consideration will also be given to the inclusion of whistleblowing information in the strategy at this stage, which would satisfy the requirements of the final recommendation outstanding.

Procurement – Follow-Up

Audit Conclusion / Findings

Good progress has been made towards the improvement of record keeping, to allow for more efficient management of information – contracts registers are available on the Council website and is updated in a timely manner and a central record of waivers is now maintained by the Procurement Team. The format of the contracts register has been revised to be more transparent and now includes both the annual value and total contract value. A review of the format highlighted that a small amendment was needed to continue compliance with the Local Government Transparency Code 2015, which was brought to the attention of the Senior Procurement Business Partner and will be actioned promptly.

Following the implementation of the In-Tend Contracts Module in October 2019, work is ongoing to ensure that all contracts are added to the system. All new contracts from the implementation date have been added, with the aim of all existing contracts being added as soon as is practicable. Whilst contracts are being monitored by the Procurement Team using two different methods, the likelihood of operational risk is slightly heightened in this area – but does not affect the overall risk level assessed in the initial audit.

Mandatory procurement training has been carried out at Cheltenham Borough Council in response to a change in procurement thresholds, giving better awareness and knowledge of the processes involved. Officers were reminded of the need to inform the Procurement Team of spend over £5000 to ensure the Councils can meet transparency requirements.

Reassurance has been given that the three actions that have not yet been started will be progressed, and further follow-up of any outstanding recommendations will commence again from December 2020.

Furthermore, the Publica Group Finance Director advised that a Strategic Action relating to Procurement has been included within the 2020-2022 Publica Business Plan, as follows: “We will create an environment, supported by robust and effective processes, where we look to maximise the potential value of all procurement opportunities by fully understanding the local supplier base / economy, utilising economies of scale and adopting innovative routes to market.”

We were advised that it is possible that this action may include a fundamental review of the Procurement Service and therefore will support opportunity for improvement and further development of a robust service going forward.

Planning Process and Complaints - Advisory

Background

In the Customer Relations Framework 2009, a complaint is defined as:

“A complaint is an expression of dissatisfaction, made by a customer, whether justified or not, about actions or lack of actions, or the standard of service delivered by the Council directly or a third party acting on behalf of the Council which affect an individual or group of customers.

A ‘request for service’, for example to empty a missed bin or notification of broken playground equipment, will not normally be dealt with formally through the complaints process. However, the customer needs to be given the option to use the complaints process which may identify if there are more significant issues behind the complaint.”

Between the period January 2017 to July 2019 a total of 411 complaints were registered by the Customer Relations team. 195 of these referred to service delivery issues with waste and recycling and therefore are not classed as official complaints (as above). The remaining 216 complaints related to car parking, planning/development control, noise pollution, pest control, taxi related matters, etc.

The Council has a 3-stage process for resolving complaints. Of the 216 complaints made, 15 complaints were escalated to stage 3. 5 of these related to planning applications. 2 of the planning complaints and 1 complaint relating to noise pollution were referred to the LGO.

Audit Conclusion / Findings

Our review of the Council's complaints procedure including planning process complaints was undertaken following a request from the Executive Director, People & Change. A planning related complaint had been escalated to the LGO (Local Government Ombudsman) who upheld the complaint. This advisory review investigated the circumstances that led to the LGO decision and offers recommendations to mitigate against the weaknesses identified.

Broadly, complaints handling follows the Council's 3-stage process, however, due to a lack of supporting evidence it is unclear if the process is complied with in all instances. We found records were either inconsistent or data was missing. Complaints were actioned by individual service areas, there was limited corporate oversight and no evidence of reviewing how complaints had been resolved, which if undertaken, would provide opportunity to learn from past experiences.

The LGO decision (September 2018) which upheld the complaint involved historic administrative and procedural errors being made dating back to 2009. The initial complaint was made in the autumn of 2015; as customer contact was not adequately maintained, and records either incomplete or missing, we cannot be certain of the date. After the stage 2 response in July 2017, there is no evidence of Council communications or dialogue with the claimant until the LGO contacted the Council 10 months later (May 2018). The matter was finally resolved in October 2019, which is 18 months after the LGO were first involved.

Planning applications can be complex and timely, which makes it even more important that records are accurately and fully maintained. Where dialogue with interested parties is not appropriately maintained the risk of a complaint being escalated to the LGO is greatly increased. This could lead to a public interest report being issued which would have an adverse impact on the Council's reputation.

We can confirm that management have addressed some of the weaknesses; a dedicated Customer Relations Officer has been appointed and the Executive Director, People & Change provides corporate oversight and accountability. We were advised the Customer Relations policy has been reviewed and procedures simplified to a 2-stage process which will be cascaded to all staff in due course. In addition, monitoring complaints handling performance is being transferred to Clearview (the performance management system), which will aid transparency and ensure appropriate actions are being undertaken.

Priority	Recommendation	Management Response	Due Date
2	The 2009 Customer Relations Framework must be removed from the website and replaced with the new policy and procedure as soon as possible. This guidance must be cascaded to all staff urgently, so that a consistent and robust process is implemented.	The new Policy and Procedure will be taken to Cabinet for approval in January 2021 and the website will be updated as soon as possible thereafter.	28/02/2021
2	To aid the effective management of complaints handling, the Clearview system should be utilised as soon as possible.	Clearview is now being utilised.	31/10/2020

High Priority Recommendation Follow-Up

APPENDIX D

Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Business Continuity Management	2	Consideration could be given to aligning the BCP with the international standard ISO22301, as this provides a framework to plan, establish, implement, operate, monitor, review, maintain and continually improve a business continuity management system.	Consideration will be given to aligning the BCP with the international standard ISO22301 following the review of the Business Continuity Planning process which will be undertaken by the Civil Protection Team after April 2019.	30/06/19	<p>Review of the service area BCP format shows the areas suggested in the above recommendation have been incorporated. The Corporate BCP will also follow the same format as that for the service areas.</p> <p>Recommendation closed.</p>
Business Continuity Management	2	Consideration should be given to the clarity of the existing template and its ability to guide an officer in difficult and stressful times, and adopting an existing template, to better meet the authority's responsibilities.	An independent review of the CBC BCPs has been agreed with the Civil Protection Team this will commence after April 2019 when resources become available. The Corporate BCP will be identified as the first plan to be reviewed.	30/06/19	<p>Review of the new BCP template confirms that the format provides clear guidance, roles, and responsibilities so that in the event of business disruption, officers can easily see what actions need to be taken to enable a swift recovery.</p> <p>In September 2019, an officer from the GCC Civil Protection team delivered a mandatory training session for all service managers. We were advised the officer followed up the training with 1:2:1 sessions to ensure that service specific matters were addressed.</p> <p>The Programme & Governance Manager advised that due to the Covid-19 pandemic, the Corporate BCP has not been updated to the new format.</p> <p>Agreed to extend implementation date to 31/10/20</p>

High Priority Recommendation Follow-Up

APPENDIX D

Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Business Continuity Management	2	Consideration could be given to the utilising the out of hours automated phone system, already in place, as an emergency information line for providing information to staff and / or the public if other methods of communication are down.	Consideration will be given to utilising the out of hours automated phone system already in place as an emergency information line after the review of the Business Continuity Plans.	30/06/19	<p>The Programme & Governance Manager advised the out of hours phone message is now only used for customers calling the Council. In the event of an emergency, information for the public is published on the Council's website, social media, local radio, etc.</p> <p>Internally a staff SMS system is used to cascade information to managers and their teams. We have seen evidence of contact numbers being updated in February 2020. Contact numbers are also available in the service area BCPs.</p> <p>Recommendation closed.</p>
Members' and Officers' Gifts, Hospitality and Declarations of Interest	2	We recommend that consideration is given to work between CBC and the Counter Fraud Unit (CFU) to refresh the approach to the declarations process as part of their planned work discuss the introduction of a risk-based approach to conflict of interest forms in 2019/20.	<p>The CFU manager agrees to review this with the support of SWAP and Governance Group as part of the 2019/2020 work plan.</p> <p>The Programme Manager agrees to work with the CFU to review their risk-based approach and see if this is appropriate for implementation at CBC.</p>	31/03/20	<p>This was discussed at CGG on 07/01/20. The Learning System will be used to manage this process. I also met with the CFU Mgr and the Programme Mgr to progress this further.</p> <p>Recommendation Closed</p>
Members' and Officers' Gifts, Hospitality and Declarations of Interest	2	We recommend that actions are taken to increase officer awareness on the responsibility to declare interests, gifts and hospitality. This may include (but not be limited to): - Regular reminders posted on the staff intranet - Sending out email reminders - Periodic training	The Programme Manager agrees to increase officer awareness through reminders on a quarterly basis and ensure periodic training is undertaken.	30/04/19	<p>This was discussed at CGG on 07/01/20. The Learning Management system will be used to manage this process. I also met with CFU Mgr, the Programme Mgr on 21/01/20 to progress this recommendation.</p> <p>Recommendation Closed</p>

High Priority Recommendation Follow-Up

APPENDIX D

Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Systems Admin	2	We recommend a principal Identity and Access Management process detailing requirements for 'Joiners, Movers and Leavers' is developed and documented and that complies with the requirements set out in the Information Security and Access Control Policy. The overarching process should apply to and embrace all systems that may not be included within the standard ICT team scope and should be available for all employees to view and follow. System administrators should then document or update local processes and procedures that should be in alignment with the overarching policy and process requirements. and documented on a quarterly basis as per the requirements of the Risk Management Policy	Our team ICT Administrators are now updating and documenting our Access Management system process for joiners, Movers and Leavers. A change control process will be introduced that will document significant changes to the ICT infrastructure which will also align to our ICT User Policies and guidance.	31/03/20	Flowcharts have been produced for the starters / leavers / variation processes. The ICT Audit and Compliance Manager will refresh the ICT Policies following the completion of the Cyber Security audit report. He is aiming to have drafted policies by March 2020 for circulation / consultation at CGG and JMT. Further follow-up has been included in the 2020/21 audit plan Revised implementation date to 31/12/20 due to Covid-19
Human Resources (Sickness Absence Reporting)	2	The partner councils' Sickness and Absence Policies should also be reviewed and updated to ensure they meet the ongoing needs of the Councils and their retained staff.	We will review the council policies. These will be brought in line with the new Publica policy if and when the partner Councils adopt the new Publica terms and conditions.	30/11/19	HR Business Partner and Head of Paid Service have discussed policy for the Council. Recommendation closed
Procurement and Contract Management	2	Assurance is sought from Publica that the Procurement and Contract Management Strategy is reviewed and updated to ensure it meets the needs of Publica and the partner Councils.	Agreed	30/09/20	Implementation date changed to 31st December 2020 to reflect amended target implementation date of majority of Procurement/Procurement & Contract Management recommendations to be actioned by Publica Procurement.

Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Procurement 41181	2	A copy of the approved contract must be held on In-Tend for all contracts over £5,000, as well as the quotes used during the tendering process, to demonstrate best value and ensure there is a complete central record.	Agreed, subject to a review of the contract value requirements.	31/12/19	<p>The Senior Procurement Business Partner demonstrated the Contracts Module on In-Tend during fieldwork. We were advised that all new contracts since the implementation of the Contracts Module (October 2019) have been input into In-Tend. These contracts are being managed by the Procurement Team via this system in terms of monitoring of contract expiry dates.</p> <p>We were able to confirm all relevant documentation (including a copy of the approved contract) was stored for the sampled CBC contract.</p> <p>We were advised by the Senior Procurement Business Partner that it is intended that contracts that were already in place at the time that the Contracts Module was implemented will be loaded into the system in the same way as new contracts, but the speed at which this can be done is dependent on available resources to carry out the work.</p> <p>To assist them in managing existing and future contracts, the Procurement Team have implemented a future Work Plan for all authorities.</p> <p>Revised implementation date to 31/12/20 due to Covid-19</p>

High Priority Recommendation Follow-Up

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Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Procurement 41029	2	Budget Holders should regularly undertake monitoring of expected contract spend to actual contract spend as part of contract monitoring, to ensure contracts are managed in accordance with strategy, and inform Procurement of any changes to contract values to ensure the values recorded on the Contract Register are correct.	Agreed	31/12/19	No evidence has been provided of actions carried out by responsible officers to support implementation of this recommendation at the time of follow-up. As part of the 2020/21 Audit Plan, an audit of the Management and Monitoring Contracts will be carried out. The scope of this audit will include budget monitoring arrangements in relation to contract spend and will therefore inform the follow-up of this recommendation. Revised implementation date to 31/12/20 due to Covid-19
Procurement 41257	2	To ensure there is a central record, when a waiver has been applied, this must be logged on the Waiver register once it has been implemented, for transparency purposes.	Agreed	31/12/19	<p>Evidence has been provided to show that a central waiver register is now in place across all authorities which is updated and maintained by the Procurement Team.</p> <p>We were advised that a copy of every waiver applied since the implementation of this central register is also held centrally by the Procurement Team, and a sample of these was provided as evidence.</p> <p>Recommendation Closed</p>

High Priority Recommendation Follow-Up

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Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Procurement 41002	2	All Officers should be informed during Procurement Process training of the following to ensure when applicable: <ul style="list-style-type: none"> Procurement are consulted on all contracts over £5,000 so all approved contracts are entered onto the Contract Register, and waiver details can be accurately recorded when appropriate 	Agreed	31/12/19	As a result of changes to procurement thresholds, the Senior Procurement Business Partner delivered training at Cheltenham Borough Council during November and December 2019, which was mandatory for officers involved in the procurement process. As part of this training, officers were informed that Procurement are required to publish all spend over £5000 and therefore must have sight of all spend. Procurement approval is required for all acquisitions over £10,000 on Agresso Business World (ABW) which will help to ensure Procurement are aware of spend over £5000 and will also allow them to identify where a waiver is used so this can be appropriately recorded. Recommendation Closed
Procurement 41323	2	To ensure all transactions are raised and approved appropriately and in line with the current organisational structure, all requisitioning and approval permissions should be reviewed in BWO.	Following the recent organisation changes, the approvals permissions will be reviewed to ensure they are aligned with new roles and implemented accordingly on the ABW system.	31/12/19	We were advised: <ul style="list-style-type: none"> A review of ABW requisitioner and approver roles is currently in progress. Together with the finance team, the ABW support team aim to review all clients over the coming months. A review of roles CBC are complete. Recommendation Closed

Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Property Use of Contractors 42057	2	<p>We recommend:</p> <p>i. that unless specialist skills are required to complete specific works, only approved framework contractors are used for general building works.</p> <p>ii. that the progress of updating the contractor framework is pursued and if necessary escalated through Publica/One Legal Client Officers and Senior Management to ensure focus on this requirement is maintained.</p>	<p>Now using only framework contractors or obtaining waivers for non-specialist works.</p> <p>Additional frameworks are being pursued though One Legal for use of the GCC framework and Publica Procurement for additional frameworks.</p>	31/03/20	<p>The Service manager reported to senior management at the end of April 20 as follows:</p> <p>a. Procurement have not sent out the framework tender for small contractors despite various chase ups</p> <p>b. GCC are no longer responding to us about their framework and use rates etc. so we are struggling to use that one</p> <p>c. Process for agreeing best value under 10k drafted I am awaiting feedback before it can be finalised.</p> <p>Revised implementation date to 31/12/20 due to Covid-19</p>
Property Use of Contractors 42058	2	<p>We recommend</p> <p>i. that process documents and associated procedures, aligned with CBC's Contract and Financial Rules, are documented and put in place so that a consistent approach to tasks can be followed and undertaken within the team as soon as possible.</p> <p>ii. A review of the service design should be undertaken to ensure that appropriate and effective processes and structures are in place.</p>	<p>Develop flow charts and sub processes to be agreed and signed off by section 151 officer.</p> <p>Started and talked already with Director and Publica Procurement to produce report on options going forward for strategic procurement of building related needs.</p>	31/03/20	<p>At the end of April 20, Service Manager reported to senior management as follows:</p> <p>a. Procurement have set up the under 25k system and templates are used for works over 10k and under 25k</p> <p>b. Draft procedures as item 1 awaiting feedback. (rec. 42057)</p> <p>Revised implementation date to 31/12/20 due to Covid-19</p>

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Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Property Use of Contractors 42062	2	<p>We recommend</p> <p>i. that the frequency of budget monitoring and reconciliation between the Council's financial system and the Uniform system is undertaken in accordance with the Financial Rules so that any issues related to budgets and expenditure are identified at an early stage. Regular management information reporting should be implemented to ensure transparency of the situation.</p> <p>ii. Consideration should be given to investigating whether the Uniform and Business World systems can be linked to aid budget monitoring processes.</p>	<p>Publica Finance has now appointed an accountant to liaise with and we will reconcile the Uniform and Agresso figures quarterly. Reviews are set up to feed into the financial reporting cycle.</p> <p>A brainstorming session has been set up to review the way Uniform and Agresso are used and explore what functionality and data can be shared across systems. Once this is determined, we will liaise with Publica IT to progress further.</p>	31/03/20	<p>At the end of April 20, the service manager reported to senior management as follows:</p> <p>Link requested for uniform to agresso link, with Programme Manager representing the corporate body for consideration, still doing manual quarterly process at present, with finance.</p> <p>Revised implementation date to 31/12/20 due to Covid-19</p>
Property Use of Contractors 42872	2	<p>We recommend that the Property Services team, return any invoice that does not contain detailed information on the works completed, including materials and labour costs and ensure only sufficiently detailed invoices are approved for payment.</p>	<p>We have contacted the contractors and requested that a breakdown of invoices are provided in all cases. All staff have been instructed to return invoice if they are not adequately broken down.</p>	31/03/20	<p>At the end of April 20, the service manager reported to senior management as follows:</p> <p>Contractors have been asked for more information on their invoices or back up documentation, where possible this is now being stored on uniform still needs developing more.</p> <p>Revised implementation date to 31/12/20 due to Covid-19</p>

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Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Apprenticeship Scheme 42609	2	We recommend that a reconciliation process is implemented for Apprenticeship Levy payments.	<p>Reconciliation is now carried out monthly between the Finance spreadsheet, the General Ledger and the online apprenticeship levy portal. Support will be requested from Finance to ensure reconciliation is being done correctly in the initial stages.</p> <p>The internal apprentice recruitment form has also been amended to ensure that the recruiting manager consults with the Finance Department to ensure there is appropriate levy funding available in the online account before the post goes for approval at the Resource Managers Group.</p>	Implemented & ongoing (to be followed up Feb 2020)	Follow-up delayed due to Covid-19.
Human Resources (Use of Volunteers) 42379	2	We recommend that a copy of a constituted group's Safeguarding Policy is received and reviewed by CBC officers before the group is allowed to participate in voluntary work on behalf of the Council.	Participation and Engagement Team leaders to review Safeguarding policy process with CBC Partnership Team Leader to agree on appropriate approach.	31/03/20	Progress delayed due to Covid-19 Revised implementation date to 31/12/20
Human Resources (Use of Volunteers) 42367	2	We recommend that a link is included within the Volunteer Privacy Statement to the 'Your Data' page on the Cheltenham Borough Council website to ensure that volunteers have access to all information on their personal data required by the EU General Data Protection Regulations	To include a link within the Volunteer Privacy Statement to the 'Your Data' page on the CBC website.	31/12/19	Recommendation has been actioned

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Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Human Resources (Use of Volunteers) 42368	2	We recommend that all volunteers that have signed historic version of the application form are asked to sign their consent to the current data protection arrangements and retention period. The current Volunteer Privacy Statement should also be brought to the attention of all volunteers who have not previously been made aware of it.	To strive to ensure that volunteers with historic consent forms are signed up to the 5-year data protection arrangements and retention period.	31/03/20	Progress delayed due to Covid-19 Revised implementation date to 31/12/20
Integrity of Data 41849	2	<p>As stated by Publica HR, we recommend that a project be initiated to review and bring up to date CBC employee's personal data. HR Processes should also ensure that required data is captured and recorded accurately.</p> <p>CBC should work with the HR service to determine the information they require to be collected as part of the refresh project and ongoing collection.</p> <p>Availability of Self-Service functionality to empower employees to view and update their own personal information should be investigated.</p> <p>Personal data collection and use should be completed in line with the Data Protection legislation, including the deletion of records that are no longer necessary.</p>	<p>We will commence work to update the emergency contact data for CBC employees by end of Feb 2020.</p> <p>We have shared the data that we could collect with CBC and we are investigating with ICT how we can develop self-service so that employees can view and update their personal information – we will provide a plan on how this could be undertaken this by 31st March 2020</p>	31/03/20	Follow-up delayed due to Covid-19.

High Priority Recommendation Follow-Up

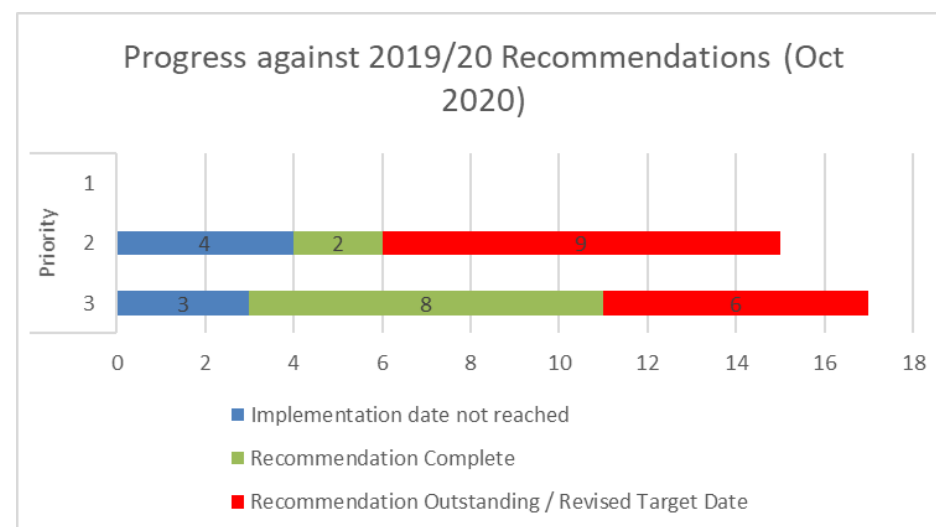
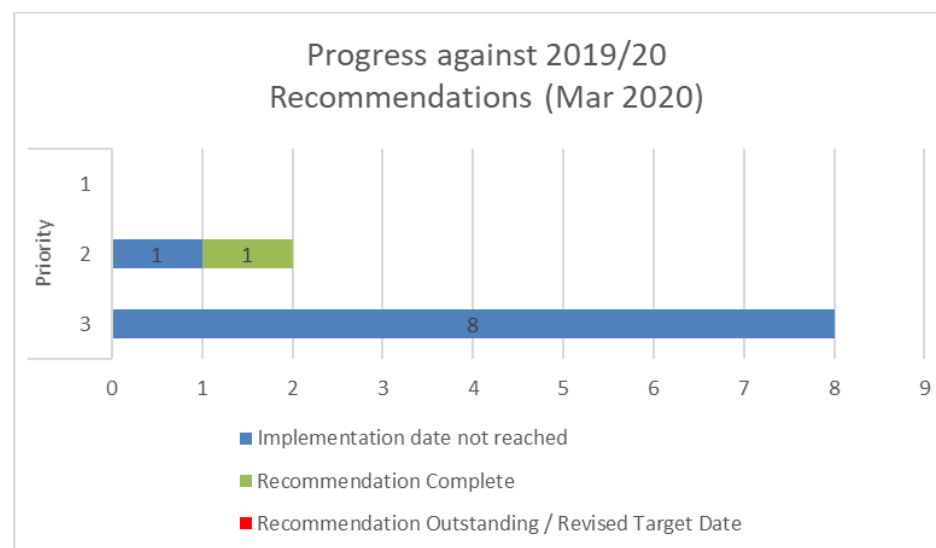
APPENDIX D

Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Integrity of Data 41980	2	We recommend that precise work instructions to complete MI reports are documented so that personnel responsible for producing MI reports, are able to gather and report on the information in a consistent and accurate manner, especially as the process is only undertaken once every three months. We also recommend that, peer review is completed on management information to verify its accuracy.	Work has commenced to gather, store and utilise MI data centrally. The work is being overseen by the Contract Manager.	31/03/20	Follow-up delayed due to Covid-19.
Integrity of Data 41689	2	We recommend that CBC consider onboarding to the Business World Self-Service functionality for sickness reporting. This will enable line managers to enter sickness periods immediately, or as soon as practically possible, and also provides Payroll with up to date absence information. This would then reduce potential delays encountered due to manual forms being requested, delivered and sometimes chased by Payroll. It would also reduce any risk of mistakes being made with the additional manual input of sickness data.	This project has commenced and will be completed early next year.	30/06/20	Follow-up delayed due to Covid-19.
Integrity of Data 41734	2	We recommend that a data privacy statement for recruitment and employment is added to the CBC website, and new applicants advised of this at the application stage.	Agree – the recruitment team will complete by the end of December.	31/12/19	CBC website was reviewed today. The link to the Publica HR pages now display appropriate privacy information. Recommendation closed

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Audit Name	Priority	Recommendation	Management Response	Due Date	Update November 2020
Safer Recruitment 41384	2	We recommend that HR policies relating to DBS issues and recruitment of ex-offenders are reviewed to ensure they are still relevant and are updated in line with current procedure and legislation.	These policies will be reviewed to assess whether they are still relevant and necessary, and updates made accordingly.	31/08/20	Will be followed-up during the annual audit
Payroll	2	We recommend that all new starters are subject to a BPSS (or similar) check regardless of the role to which they are being recruited. This will ensure that consistent checks of right to work, employment history and basic criminal record checks are carried out on all employees.	A piece of work has been carried out to re-write the pre-employment check process. The HR and Recruitment Teams are also working towards the implementation of an Application Tracking System (ATS), subject to approval at Publica and the Councils, which would help to mitigate the risks identified. The ATS would not allow for progression in the recruitment and onboarding process without specific criteria being fulfilled first (e.g. obtaining references, ID checks etc).	30/09/20	Will be followed-up during the annual audit



SWAP - Independent External Assessment Report Summary

March 2020

Assessment Team:

Alix Wilson, BA/IPFA, Head of South West London Audit Partnership
Russell Banks CMIIA, Chief Internal Auditor, Orbis

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1 Introduction

1.1 The Public Sector Internal Auditing Standard (PSIAS) and the International Standards for the Professional Practice of Internal Auditing require that an external quality assessment (EQA) of an internal audit activity must be conducted at least once every five years by a qualified, independent assessor or assessment team from outside the organisation. The qualified assessor or assessment team must demonstrate competence in both the professional practice of internal auditing and the EQA process. The EQA can be accomplished through a full external assessment or a self-assessment with independent validation.

1.2 SWAP Internal Audit Services (SWAP) conducted a self-assessment of its internal audit activity and selected Orbis and South West London Audit Partnership (SWLAP) as the qualified, independent external assessment team to conduct a validation of the self-assessment by SWAP. In addition, the assessment team was also asked to consider, drawing on their previous extensive partnership experiences, what actions might be taken to further improve the overall quality and effectiveness of the service.

1.3 The assessment team was made up of Russell Banks, Chief Internal Auditor for Orbis and Alix Wilson, Head of SWLAP. Orbis deliver internal audit and counter fraud services to Surrey County Council, East Sussex County Council and Brighton & Hove City Council, as well as to range of external clients, including emergency services and district/borough councils. SWLAP is a 5 Borough shared audit service covering the Royal Borough of Kingston and the London Boroughs of Richmond, Wandsworth, Sutton and Merton. SWLAP also delivers internal audit services to a number of external clients including Achieving for Children, a wholly owned community interest company providing children's services to Kingston, Richmond and Windsor and Maidenhead councils.

2 Objectives

2.1 The principle objective of the EQA was to assess SWAP's conformance with the Standards and the Code of Ethics.

2.2 In addition, the assessment team has sought to draw on its own experiences of delivering professional internal audit services, in a partnership capacity, to a range of public sector organisations to help identify any further opportunities to improve the overall quality and effectiveness of the services delivered by SWAP.

3 Executive Summary

3.1 SWAP is a high performing and well managed internal audit partnership, delivering professional and high-quality services to its partner/client organisations in conformance with Public Sector Internal Audit Standards. Whilst some areas of partial conformance with the Standards have been identified, none of these are considered to be significant.

3.2 Interviews with stakeholders were overwhelmingly positive about the service they receive from SWAP, recognising the value and professionalism of the service. In the interest of continuous improvement, something quite rightly seen as being of great importance to the Chief Executive and SWAP management, we have taken the opportunity as part of this review to identify areas where the organisation can further improve and develop. In many cases, these are simply suggestions for management to consider as in some cases, they may not be appropriate for every internal audit service provider.

3.3 To demonstrate how the service is viewed we have captured a flavour of some of the comments made to us:

- + *“The quality of reports is good and the recommendations are proportionate and well explained”* – s.151 Officer
- + *“The auditors have good knowledge of the organisation and its risks. The organisation recognises that they have skills that can be used and trust their advice”* – Monitoring Officer
- + *“Internal audit brings insight from other clients and a wider knowledge”* – s.151 Officer
- + *“They are treated as a critical friend and are seen to add value”* – Executive Director

4 PSIAS Statement of Conformance

4.1 Based on the work carried out it is our overall opinion that SWAP generally conforms with the Standards and the Code of Ethics. A summary of Evaluation Actions to be taken by SWAP to address areas for improvement against individual Standards and the Code of Ethics is shown in *Section 5*.

4.2 The IIA's Quality Assessment Manual for the Internal Audit Activity suggests a scale of three rankings when opining on the internal audit activity:

DEFINITIONS	
Generally Conforms	The internal audit activity has a charter, policies, and processes that are judged to be in conformance with the <i>Standards</i> and the Code of Ethics.
Partially Conforms	Deficiencies in practice are noted that are judged to deviate from the <i>Standards</i> and the Code of Ethics; however, these deficiencies did not preclude the internal audit activity from performing its responsibilities in an acceptable manner.
Does Not Conform	Deficiencies in practice are judged to deviate from the <i>Standards</i> and the Code of Ethics, and are significant enough to seriously impair or preclude the internal audit activity from performing adequately in all or in significant areas of its responsibilities.

(Ref: Institute of Internal Auditors)

4.3 A detailed description of conformance criteria can be found in *Appendix A*.

5 Evaluation Actions Summary

There were a small number of areas where partial conformance was identified. These were minor observations, none of which were significant enough to affect the overall opinion. Some were captured across more than one of the attribute standards or are recommendations for improvement, rather than failures in conformance. A summary of the actions agreed relating to these areas are as follows:

Task
Regular meetings will be held with all Audit Committee Chairs to further strengthen relationships and ensure that they are kept up to date with any issues outside of formal meetings. (Attribute Standard 1000)
We will consider establishing an Internal Audit Strategy which sits alongside the Charter and annual plan, which will cover the objectives and remit of the service, and how it will be delivered. This will include service and staff development. (Attribute Standard 2010)
There will be a consolidation of the templates used as part of the engagement planning process, to ensure that the fraud risks are properly considered. The pre-audit questionnaire will be reviewed and updated, the template loaded onto MK Insight and formally rolled out. The process of reviewing Audit Terms of Engagement will consistently include reviewing the results of the pre-audit questionnaire, to ensure that risks have been properly identified and reflected in the scope of the review. (Attribute standard 1210)
The Internal Audit Charter will be extended to cover the type of consultancy work which could be provided, and how independence will be maintained. This detail will also be reflected within the Internal Audit Strategy, once developed. (Attribute standard 2200)
Whilst it may not be proportionate to report the QAIP (Quality Assessment Improvement Plan) in its entirety to Audit Committees, an update on progress will be included in the annual opinion reports going forward. (Attribute Standards 1300, 1310, 1311, 1320 and 2450)
The inclusion of significant issues identified in AGS (Annual Governance Statement) reports helps ensure that internal audit provides holistic assurance of the organisation, particularly where there are known concerns. The identification of other sources of assurance aim to ensure that work is co-ordinated with other assurance bodies and limited resources are not duplicating effort. The Audit manual will be updated to ensure that the AGS forms part of the audit planning risk assessment process, and other sources of assurance are duly considered. (Attribute standard 2010 and 2050)
The Audit Manual and accompanying power point slides that have been embedded in the induction will be made accessible on the Intranet to all staff. (Attribute Standard 2020)
The QAIP will be maintained as a live document and reported to the Board and respective Audit Committees. (Attribute Standards 1300, 1310, 1311, 1320 and 2450)

The PSIAS can be viewed at <https://www.cipfa.org/policy-and-guidance/standards/public-sector-internal-audit-standards>.

Appendix A – Rating Definitions

GC – “Generally Conforms” means that the assessor or the assessment team has concluded that the relevant structures, policies, and procedures of the activity, as well as the processes by which they are applied, comply with the requirements of the individual standard or elements of the Code of Ethics in all material respects. For the sections and major categories, this means that there is general conformity to a majority of the individual standard or element of the Code of Ethics and at least partial conformity to the others within the section/category. There may be significant opportunities for improvement, but these should not represent situations where the activity has not implemented the Standards or the Code of Ethics and has not applied them effectively or has not achieved their stated objectives. As indicated above, general conformance does not require complete or perfect conformance, the ideal situation, or successful practice, etc.

PC – “Partially Conforms” means that the assessor or assessment team has concluded that the activity is making good-faith efforts to comply with the requirements of the individual standard or elements of the Code of Ethics, or a section or major category, but falls short of achieving some major objectives. These will usually represent significant opportunities for improvement in effectively applying the Standards or the Code of Ethics and/or achieving their objectives. Some deficiencies may be beyond the control of the internal audit activity and may result in recommendations to senior management or the board of the organisation.

DNC – “Does Not Conform” means that the assessor or assessment team has concluded that the internal audit activity is not aware of, is not making good-faith efforts to comply with, or is failing to achieve many or all of the objectives of the individual standard or element of the Code of Ethics, or a section or major category. These deficiencies will usually have a significantly negative impact on the internal audit activity’s effectiveness and its potential to add value to the organisation. These may also represent significant opportunities for improvement, including actions by senior management or the board.

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Cheltenham Borough Council
Audit, Compliance and Governance Committee – 11 November 2020
Counter Fraud Unit Report

Accountable Member	Cabinet Member Corporate Services, Councillor Alex Hegenbarth
Accountable Officer	Paul Jones Executive Director Finance and Assets Paul.Jones@cheltenham.gov.uk
Report Author	Emma Cathcart Counter Fraud Unit Manager 01285 623356 Emma.Cathcart@cotswold.gov.uk
Ward(s) affected	All indirectly
Key/Significant Decision	No
Executive summary	<p>The purpose of the report is to provide the Audit, Compliance and Governance Committee with assurance over the counter fraud activities of the Council. The Counter Fraud Unit will continue to provide Audit, Compliance and Governance Committee with direct updates biannually.</p> <p>Work plans are presented to the Audit, Compliance and Governance Committee detailing progress and results for consideration and comment as the body charged with governance in this area.</p> <p>The report also provides the annual update to Audit Committee in relation to the Regulation of Investigatory Powers Act 2000 (RIPA), the Investigatory Powers Act 2016 (IPA), the Council's existing authorisation arrangements and the outcome of the recent inspection by the Investigatory Powers Commissioner's Office (IPCO).</p>
Recommendations	<p>That the Audit, Compliance and Governance Committee:</p> <p>a) Notes the report and makes comment as necessary.</p>
Financial implications	<p>The report details financial savings generated by the Counter Fraud Unit.</p> <p>Contact Officer: Paul Jones, Executive Director Finance and Assets Paul.Jones@cheltenham.gov.uk</p>

Legal implications	<p>In general terms, the existence and application of an effective fraud risk management regime assists the Council in effective financial governance which is less susceptible to legal challenge.</p> <p>The Counter Fraud Unit adheres to the appropriate legislation when conducting work on behalf of the Council and other partners.</p> <p>The Council is required to ensure that it complies with the Regulation of Investigatory Powers Act 'RIPA' 2000, the Investigatory Powers Act 2016 and any other relevant/statutory legislation regarding investigations. Any authorisations for directed/covert surveillance or the acquisition of communications data undertaken should be recorded appropriately in the Central Register.</p> <p>The Council has a statutory obligation for enforcing a wide range of legislation, where it is necessary and proportionate to do so. Human rights implications are a consideration of this type of activity and this is included within the Policies.</p> <p>Contact officer: One Legal Legalservices@tewkesbury.gov.uk</p>
HR implications (including learning and organisational development)	<p>The HR team continue to work closely with the Counter Fraud Unit on all internal investigations.</p> <p>The promotion of effective counter fraud controls and a zero tolerance approach to internal misconduct promotes a positive work environment.</p> <p>Contact officer: Julie McCarthy, HR Operations Manager Julie.McCarthy@publicagroup.uk 01242 264355</p>
Key risks	<p>The Council is required to proactively tackle fraudulent activity in relation to the abuse of public funds. The Counter Fraud Unit provides assurance in this area.</p> <p>Failure to undertake such activity would accordingly not be compliant and expose the authority to greater risk of fraud and/or corruption.</p> <p>If the Council does not have effective counter fraud and corruption controls it risks both assets and reputation.</p> <p>The RIPA and IPA Policies demonstrate the Council's consideration of necessity, proportionality and public interest when deciding on surveillance activity or the decision to obtain personal communication data. The application of the Policies and Procedures, to govern surveillance and the obtaining of personal communications data, minimises the risk that an individual's human rights will be breached. Furthermore it protects the Council from allegations of the same.</p>
Corporate and community plan Implications	<p>In administering its responsibilities; this Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor.</p> <p>The Council is committed to an effective counter fraud and corruption culture, by promoting high ethical standards and encouraging the prevention and detection of fraudulent activities, thus supporting corporate and community plans.</p>
Environmental and climate change implications	<p>N/A</p>
Property/Asset Implications	<p>There are no property implications associated with this report.</p> <p>Contact officer: Dominic Stead, Head of Property Services dominic.stead@cheltenham.gov.uk</p>

1. COUNTER FRAUD UNIT REPORT

- 1.1.** The Counter Fraud Unit provides Audit, Compliance and Governance Committee with direct updates biannually. The Audit, Compliance and Governance Committee is the body which oversees the Council's counter fraud arrangements and it is therefore appropriate for the Committee to be updated in relation to such activity.
- 1.2.** Work plans have been agreed with the Executive Director Finance and Assets and the Council's Management and work is underway. The Audit, Compliance and Governance Committee, as the body charged with governance in this area, is presented with a copy of the work plan for information.
- 1.3.** Attached at Appendix 2 is a copy of the work plan for 2019/2020.
- 1.4.** Attached at Appendix 3 is a copy of the work plan for 2020/2021.
- 1.5.** The Counter Fraud Unit (CFU) has been supporting work streams created as a consequence of the pandemic by providing advice relating to fraud risk and abuse, most significantly in relation to the Small Business Grant Funding, Retail, Leisure & Hospitality Grant Funding and Discretionary Grant payments. To date the CFU has received 44 referrals from the Revenues Team to review resulting in the following:
- 30 cases that were confirmed as eligible and the grants were paid.
 - 7 cases of loss prevention, in that the grant monies were not paid, totalling £70,000 (4 classed as fraudulent attempts and 3 classed as not eligible).
 - 7 cases of post payment recovery totalling £80,000 (5 classed as fraud and 2 classed as not eligible or error) have been identified and invoices have been raised. Of this £80,000, £40,000 has been repaid.
 - Additional post payment checks were undertaken. All payment data was sent for analysis to CIFAS (a fraud prevention service representing organisations from across the public, private and voluntary sectors) for matching against the National Fraud Database and to Spotlight (Cabinet Office) for wider checks relating to individual company records. A comprehensive template has been provided to ensure a consistent approach to fraud risk assessment in this area and requires details relating to how these are mitigated and managed.
- 1.6.** The CFU developed a medium term enforcement proposal to manage the current situation whilst we cannot undertake interviews under caution in person. This proposal follows guidance from the Crown Prosecution Service and others which recommends that written statements under caution are obtained so that enforcement activity may continue.
- 1.7.** The CFU have procured a case management system and as such we are now able to implement a new referral process which means that referrals will automatically be uploaded into the system via a secure link for all 5 partner Councils, Publica and the 10 third party clients.
- 1.8.** All Local Authorities participate in the Cabinet Office's National Fraud Initiative, which is a data matching exercise to help prevent and detect fraud nationwide. The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under Data Protection Legislation.
- The team have reviewed 1,249 matches relating to single person discount anomalies. Of these matches 101 accounts have been identified as requiring amendments, so far 71 reports have been issued to the Revenues Team. Results are pending.
- 1.9.** In addition to Appendix 2 and Appendix 3, as a dedicated investigatory support service, the CFU undertakes a wide range of enforcement work according to the requirements of each Council. This includes criminal investigation and prosecution support for enforcement teams, investigations into staff/member fraud and corruption, or tenancy and housing fraud investigation work.
- 1.10.** Summary of work:

- Single Point of Contact for Department for Work and Pensions (DWP) referrals. During 2019/2020, 138 Local Authority Information Exchange Forms have been received or referred to DWP for action. In addition we have received or referred 52 cases for joint working.

Since 1 April 2020, 9 Local Authority Information Exchange Forms have been received or referred to DWP for action and we have received or referred 8 cases for joint working.

- Undertaking the investigation of alleged fraud and abuse in relation to the Council Tax Reduction Scheme (Council Tax Support).

During 2019/2020, 14 cases were referred for investigation and 16 cases were closed or rejected. This resulted in 2 Criminal Sanctions (Penalties £500), 1 Civil Penalty (£50) and £1,041 of recoverable Council Tax Support being calculated. The work also resulted in a joint prosecution with the Department for Work and Pensions. The defendant pleaded guilty and received an 18 month suspended sentence, 200 hours community service and was ordered to pay costs of £340. The defendant had fraudulently claimed £4,140 in Council Tax Support which has since been paid in full. In addition overpayments of Housing Benefit exceeding £52,600 have been generated.

Since 1 April 2020, 9 referrals have been received and 7 cases have been closed. 1 Criminal Sanction (Penalty £566) has been issued and £1,131 of recoverable Council Tax Support has been calculated.

- Review of the NNDR empty void premises – rolling review of premises rated as empty. During 2019/2020 221 visits were completed – 24 were identified as potentially occupied and a further 45 had anomalies or account amendments referred to the team. This exercise is a record keeping one. Due to the fact that there is no liability for three months on empty premises and when occupied other reliefs are likely to be applied – mandatory relief for Charities or Small Business Rate Relief.
- Review of the empty residential properties not yet classified as long term (C1 Empties) or those classified as long term empty. During 2019/2020 446 properties were visited. 41 properties were referred as occupied / furnished with a request to review liability and a further 1701 anomalies were referred back to the team. The work supports the Council's Revenues Team to manage empty properties and maximise the tax base and new homes bonus.
- During 2019/2020 a further 8 cases were referred from Parking Services, Environmental Health, Community Protection and Revenues. The Revenues cases are complete and resulted in the removal of single person discounts and increased liability of £1,544. 7 cases have been referred from Planning, HR and Revenues since 1 April 2020.
- Work with Cheltenham Borough Homes 2019/2020:
 - 305 referrals received requesting checks for homelessness, right to buy, succession or housing applications. In relation to right to buy applications, additional checks have been introduced to ensure that any resultant benefit issues are addressed.
 - Full review of the Housing List. Verification of applications within Emergency Band (61 applications), Gold Band (55 applications) and Silver Band (620 applications). The review has resulted in the removal of 3 applications from the Emergency List and 4 applications being removed from the Gold List. The results of the Silver List are still pending.

Each cancelled application represents a property which can be reallocated to another eligible family. The National Fraud Initiative apply a figure of £3,240 for each application removed, for future losses prevented as a result of removing an applicant because there is no need for temporary accommodation to be utilised; this equates to a notional loss avoidance figure of £22,680 for this exercise so far. In addition the result of the band reprioritisation is that those families who are correctly banded have a greater chance of being housed and more speedily.

 - Whilst undertaking the review, the CFU also processed the related National

Fraud Initiative anomalies – this is ongoing.

- 52 referrals have been made relating to housing and tenancy fraud such as abandonment, illegal succession, subletting, false housing applications, right to buy fraud. This resulted in:
 - 3 cases resulting in the termination of tenancy and return of the property resulting in £279,000 loss avoidance. The NFI annual report estimated the figure to be £93,000 per property recovered based on average four year fraudulent tenancy – this includes temporary accommodation for genuine applicants, legal costs to recover the property, re-let costs and rent foregone during the void period between tenancies.
 - 2 Civil Hearings re illegal succession cases. Possession Order and Costs granted in both cases.
 - 1 successful prosecution re fraudulent Housing Application. £120 Fine and £316 Costs awarded.
- Work with Cheltenham Borough Homes 2020/2021:
 - 97 referrals received requesting checks for homelessness, right to buy, succession or housing applications. Information supplied in relation to a succession application resulted in the refusal of the request and the recovery of the property.
 - 25 referrals have been made relating to housing and tenancy fraud such as abandonment, illegal succession, subletting, false housing applications, right to buy fraud.
 - Completion of a review of household data which forms part of the tenancy audit. Tenancy household data is being compared with that held by Revenues and Benefits to identify any anomalies relating to occupancy – this may then highlight discrepancies with council tax discounts/exemptions, benefit entitlement or tenancy matters. 4,544 properties were reviewed. 1,445 recommendations have been made and forwarded to the appropriate officers.
 - There is currently a case listed in the Magistrates Court for consideration relating to a false housing application.

2. REGULATION OF INVESTIGATORY POWERS ACT 2000 (RIPA) / INVESTIGATORY POWERS ACT 2016

- 2.1.** The Council's Policies are based on the legislative requirements of these Acts and the Codes of Practice relating to directed surveillance and the acquisition of communications data.
- 2.2.** The Policies were reviewed and presented to the Audit Committee in January 2020; these were adopted by Cabinet in February 2020.
- 2.3.** The Council must have a Senior Responsible Officer and Authorising Officers to approve any applications for surveillance or the use of a Covert Human Intelligence Source, before the Court is approached. The Senior Responsible Officer is the Chief Executive, Gareth Edmundson and the Authorising Officers are the Executive Director People and Change, Darren Knight and the Director of Environment, Mike Redman.
- 2.4.** All applications for communications data are made online via the National Anti-Fraud Network (NAFN) which acts as the single point of contact for Councils. There is a requirement for the Council to nominate a Designated Senior Officer who will confirm to NAFN that the Council is aware of any request and approves its submission. This role is undertaken by the Counter Fraud Unit Manager and the Deputy Counter Fraud Unit Manager.
- 2.5.** There have been no RIPA applications made by the Council during 2019/2020. There has been one Non-RIPA application made during 2019/2020 which relates to overt activity.
- 2.6.** The Council takes responsibility for ensuring its procedures relating to surveillance and the acquisition of communications data are continuously improved and all activity is recorded.

2.7. The recent inspection was completed remotely and the report confirms a high level of compliance by the Council. The recommendations were as follows:

- That the Authorising Officers and Senior Responsible Officer will receive refresher training at the earliest opportunity and any enforcement officers by the end of 2021.
- That the drafted Social Media Policy be approved and adhered to. This is currently in the consultation phase and will be presented to the Audit, Compliance and Governance Committee in due course.
- That the Policies and the Counter Fraud Unit Data Retention Procedure be updated to reflect the minimum retention periods for material acquired through covert activity.

Risk Assessment

Appendix 1

The risk				Original risk score (Impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
1	The authority suffers material loss and reputational damage due to fraud	Executive Director Finance and Assets	December 2014	3	3	9	Reduce	Maintain a Counter Fraud Team to reduce the likelihood of the risk materialising and also to help recover losses, thus reducing the impact.	Ongoing	Chief Finance Officer	
2	Without dedicated specialist staff in place, the Council may be unable to take effective and efficient measures to counter fraud, potentially resulting in authority suffering material losses due to fraud and error	Executive Director Finance and Assets	September 2016	3	4	12		Retain a specialist Counter Fraud Unit to tackle the misuse of public funds on behalf of the Council.	Ongoing	Chief Financial Officer	
Explanatory notes Impact – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical) Likelihood – how likely is it that the risk will occur on a scale of 1-6 (1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability) Control - Either: Reduce / Accept / Transfer to 3rd party / Close											

Department / Contact	Task	Dates / Notes
Corporate / Strategy	Delivery of two reports for Audit (and Risk) Committee	April, September and March
Corporate / Strategy	RIPA Coordinator Role - Review of Policies / annual report to Members / advisory role for staff	Annual update provided April 3 Policies to be managed; Social Media Policy to Governance Group for consultation. Surveillance and Communications Data Policies approved and adopted.
Corporate / Strategy	Home Office Serious and Organised Crime Checklist and accompanying work plan	Draft issued to Governance Group; July and ELT; August. To be cascaded to Service Managers and Team Leaders. Associated work plan to be managed by CFU.
Corporate / Strategy	Home Office Bribery and Corruption Assessment Template and accompanying work plan	To be included within 20/21 work plan
Corporate / Strategy	Staff and Members Fraud Awareness Sessions	No Member provision required / Staff only
Corporate / Strategy	Development / Review of Fraud Response Plan	To be included within 20/21 work plan
Corporate / Strategy	Review Corporate Risk Register	To be included within 20/21 work plan with a focus on service specific risks
Corporate / Strategy	Development of Fraud awareness literature for staff and members	Draft complete to be issued to ELT for consideration; transferred to 20/21 work plan
Corporate / Strategy	Development of RTB / debt recovery process	To be included within 20/21 work plan
Corporate / Strategy	Enforcement Officer training	To be included with RIPA / IPA training sessions 20/21
Corporate / Strategy	Collation and Publication of Fraud Transparency Data	Complete; Published August
Procurement	Assist with review of Procurement and Contract Strategy	Procurement Fraud training delivered to all staff with Procurement and One Legal

Department / Contact	Task	Dates / Notes
Procurement	Supplier payment review	To be included within 20/21 work plan
SWAP	Policy and Procedure: Staff Declarations of Interest / Conflicts of Interest	Draft issued to Governance Group for consideration; transferred to 20/21 work plan
SWAP	Review of the Gifts and Hospitality Policy and Procedure	Draft approved by Governance Group; transferred to 20/21 work plan
HR	Review of HR Recruitment and Vetting Policy and Procedures	To be included within 20/21 work plan
Policy	Drafting / consultation / adoption of Money Laundering Policy	To be included within 20/21 work plan
Revenues and Benefits	NNDR (Business Rates) empties on a rolling review	As at 31.12.2019 221 visited / 24 occupied / 45 anomalies
Revenues and Benefits	Council Tax Long Term Empties / Short Term Empties reviews	446 properties visited. 41 properties have been referred as occupied / furnished with a request to review liability / 170 anomalies
Revenues and Benefits	Holiday Let review	To be included within 20/21 work plan
Revenues and Benefits	National Fraud Initiative Match Review – (2 matches only)	Complete - anomalies referred to DWP
CBH / CBC	Review of Housing List	Complete – 61 Emergency reviewed / 3 removed. 55 Gold reviewed / 4 removed. 620 Silver reviewed / results pending. 7 removed = £22,680 loss avoidance

SOC = Serious and Organised Crime

IPCO = Investigatory Powers Commissioner's Office

Department / Contact	Task	Dates / Notes
Corporate / Strategy	Delivery of two reports for Audit, Compliance and Governance Committee	March (cancelled) and November
Corporate / Strategy	RIPA Coordinator Role - Review of Policies / annual report to Members / advisory role for staff	Annual update - November IPCO Inspection complete and report issued SRO & AO roles reviewed and IPCO updated Draft Internet and Social Media Investigations Policy and Procedure to Governance Group for consideration
Corporate / Strategy	Home Office Serious and Organised Crime Checklist and accompanying work plan	Request re consideration in Licensing
Corporate / Strategy	Home Office Bribery and Corruption Assessment Template and accompanying work plan	
Corporate / Strategy	Staff and Members Fraud Awareness Sessions	Members N/A / Staff online
Corporate / Strategy	Development / Review of Fraud Response Plan	
Corporate / Strategy	Development of Service Specific Fraud Risk Register	
Corporate / Strategy	Development of Fraud awareness literature for staff and members	Completed - ELT approval pending
Corporate / Strategy	Development of RTB / debt recovery process	
Corporate / Strategy	RIPA, IPA, CPIA, PACE, Disclosure Training - SRO & AO's / Enforcement Officers	
Corporate / Strategy	Collation and Publication of Fraud Transparency Data	Published - June
Procurement	Assist with review of Procurement and Contract Strategy	
Procurement	Supplier payment review	
SWAP	Policy and Procedure: Staff Declarations of Interest / Conflicts of Interest	Draft issued to Governance Group for consideration. Further consideration required with HR and One Legal
SWAP	Review of the Gifts and Hospitality Policy and Procedure	Draft issued to Governance Group for consideration Final version presented for approval December 2020. ELT to be updated / staff cascade to be completed

Department / Contact	Task	Dates / Notes
HR	Review of HR Recruitment and Vetting Policy and Procedures	
Policy	Review Whistle-Blowing Policy	
Policy	Drafting / consultation / adoption of Money Laundering Policy	Draft issued to Finance / Executive Director Finances and Assets for consideration
Revenues and Benefits	NNDR empties on a rolling review	
Revenues and Benefits	CTax LTEs and C1 reviews	
Revenues and Benefits	Holiday Let / Airbnb review	
Revenues and Benefits	NFI - SPD / Electoral Register	Complete, pending results
Revenues and Benefits	SMI Review (sample 20)	Q3
Revenues and Benefits	SBRR Review	Q3
Revenues and Benefits	Business Grants Post Payment Assurance	
CBH / CBC	Review of Housing List	Q3

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Audit, Compliance and Governance Committee 2020-21 work plan

Item	Author
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11 November 2020 (Report deadline: 2 November)	
Annual Review of Risk Management Policy	Ann Wolstencroft
Clearview	Ann Wolstencroft
The Audit Findings for Cheltenham Borough Council	Grant Thornton
Statement of Accounts including letter of representation	Andrew Knott
Internal audit plan and progress report	Internal Audit
Counter Fraud update and future work provision	Counter Fraud Unit
20 January 2021 (Report deadline: 8 January 2021)	
IT Security update	IT (REQUIRED) / Tony Oladejo
Audit committee update	Grant Thornton
Internal audit monitoring report	Internal Audit
Annual governance statement – significant issues action plan	Internal Audit
21 April 2021 (Report deadline: 9 April 2021)	
Audit progress report and sector updates	Grant Thornton
External audit plan (for the current year)	Grant Thornton
Annual plan (for the upcoming year)	Internal Audit
Internal audit monitoring report	Internal Audit
Counter Fraud Unit report (inc. RIPA / IPA update)	Counter Fraud Unit
Annual review of Code of Corporate Governance	Darren Knight
Annual Governance Statement	Darren Knight
Annual Review of Risk Management Policy	Ann Wolstencroft
14 July 2021 (Report deadline: 2 June 2021)	
Internal audit opinion (for the previous year)	Internal Audit
Annual Audit Fee letter for the coming year	Grant Thornton
Audit highlights memorandum - ISA 260 (for the previous year) inc. Financial Resilience	Grant Thornton
Auditing Standards – communicating with the Audit Committee	Paul Jones/Chair
Statement of Accounts (previous year) (inc. letter of representation)	Finance Team

Audit, Compliance and Governance Committee 2020-21 work plan

Item	Author
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ANNUAL ITEMS (standing items to be added to the work plan each year)	
January	
IT Security update	IT (REQUIRED) and Tony Oladejo
Audit committee update	Grant Thornton
Internal audit monitoring report	Internal Audit
Annual governance statement – significant issues action plan	Internal Audit
April	
Audit progress report and sector updates	Grant Thornton
External audit plan (for the current year)	Grant Thornton
Annual plan (for the upcoming year)	Internal Audit
Internal audit monitoring report	Internal Audit
Counter Fraud Unit report (inc. RIPA / IPA update)	Counter Fraud Unit
Annual review of Code of Corporate Governance	Darren Knight
Annual Governance Statement	Darren Knight
Annual Review of Risk Management Policy	Ann Wolstencroft
July	
Internal audit opinion (for the previous year)	Internal Audit
Annual Audit Fee letter for the coming year	Grant Thornton
Audit highlights memorandum - ISA 260 (for the previous year) inc. Financial Resilience	Grant Thornton
Auditing Standards – communicating with the Audit Committee	Paul Jones/Chair
Statement of Accounts (previous year) (inc. letter of representation)	Finance Team
September	
Internal audit monitoring report	Internal Audit
Counter Fraud update and future work provision	Counter Fraud Unit
Annual audit letter (for the previous year)	Grant Thornton