

The Audit Plan for Sandwell Metropolitan Borough Council

Year ending 31 March 2025

April 2025



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O1 Key developments impacting our audit approach

Local Audit Reform

External factors

Proposals for an overhaul of the local audit system

On 18 December 2024, the Minister of State for Local Government and English Devolution, Jim McMahon OBE, wrote to local authority leaders and local audit firms to announce the launch of a strategy to overhaul the local audit system in England. The proposals were also laid in Parliament via a Written Ministerial Statement.

The government's strategy paper sets out its intention to streamline and simplify the local audit system, bringing as many audit functions as possible into one place and also offering insights drawn from audits. A new Local Audit Office will be established, with responsibilities for:

- Coordinating the system including leading the local audit system and championing auditors' statutory reporting powers;
- · Contract management, procurement, commissioning and appointment of auditors to all eligible bodies;
- · Setting the Code of Audit Practice;
- · Oversight of the quality regulatory framework (inspection, enforcement and supervision) and professional bodies;
- Reporting, insights and guidance including the collation of reports made by auditors, national insights of local audit issues and guidance on the eligibility of auditors.

The Minister also advised that, building on the recommendations of Redmond, Kingman and others, the government will ensure the core underpinnings of the local audit system are fit for purpose. The strategy therefore includes a range of other measures, including:

- setting out the vision and key principles for the local audit system;
- committing to a review of the purpose and users of local accounts and audit and ensuring local accounts are fit for purpose, proportionate and relevant to account users;
- enhancing capacity and capability in the sector;
- · strengthening relationships at all levels between local bodies and auditors to aid early warning system; and
- · increased focus on the support auditors and local bodies need to rebuild assurance following the clearing of the local audit backlog.

Our Response

Grant Thornton welcomes the proposals, which we believe are much needed, and are essential to restore trust and credibility to the sector. For our part, we are proud to have signed 83% of our 2022/23 local government audit opinions without having to apply the local authority backstop. This compares with an average of less than 30% sign off for other firms in the market. We will be keen to work with the MHCLG, with existing sector leaders and with the Local Audit Office as it is established to support a smooth transition to the new arrangements.

Key developments impacting our audit approach

National Position

Local governments face many challenges, the pandemic along with the cost of living crisis has left local governments with economic, social, and health challenges to address:

Staffing: A key challenge facing councils in maintaining service sustainability is the growing difficulties in relation to workforce recruitment and retention. Councils struggle to attract and retain qualified staff, especially younger talent. Many councils have outdated recruitment processes and are heavily reliant on agency staff.

Climate change: As the impacts of climate change become increasingly evident, local government plays a pivotal role in mitigating and adapting to these changes. The UK's targets for achieving net zero carbon emissions and local authority pledges must align into cohesive policies with common goals. This includes ongoing local economy investment in renewable energy, promoting sustainable transportation and implementing measures to enhance resilience against extreme weather events.

Housing crisis: The shortage of affordable housing continues to be an issue. There aren't enough social rented homes to meet demand and it's difficult to find land for new housing developments. New requirements around net zero and other environmental considerations make it more complex to get planning permission. Local authorities therefore face the challenge of providing adequate housing while balancing environmental sustainability and statutory planning requirements.

Funding: Local governments face many challenges in securing funding, including declining grant income, slow tax revenue growth, and rising demand for services. These challenges can make it difficult for local government to balance their budgets, assess their revenue base, enforce taxes, and prevent tax evasion. Social care costs, maintaining aging infrastructure, SEND and homelessness are driving up council spending and cuts to discretionary services impact local communities. Strained budgets are making it challenging to fund essential services, infrastructure projects and the ongoing stream of section 114 notices will not come as a surprise this year.

Digital Transformation: The fast pace of technological advancement poses both opportunities and challenges for local government. The adoption of digital tools and platforms is crucial for improving service delivery, enhancing communication and streamlining administrative processes. However, many communities still lack access or ability to navigate essential technology which creates a digital divide. Local government needs to ensure inclusivity in its digital strategies, addressing disparities and ensuring all residents can benefit from the opportunities technology offers.

Cybersecurity: Local government needs to protect against malware and ransomware attacks. They also need to navigate central government policy shifts and constraints. With increased reliance on digital platforms, they become more vulnerable to cyber threats. Safeguarding sensitive data and ensuring the integrity of critical systems are paramount and local authorities must invest in robust cybersecurity measures, employee training and contingency plans to protect themselves.

Our Response

Building and maintaining public trust is arguably the cornerstone of effective governance. Local government must prioritise transparency, open communication and meaningful public engagement to foster positivity within communities.

Despite councils' best efforts, financial pressures are affecting the scale, range and quality of council services provided to local residents. The clearest evidence of this is that councils' service spending is increasingly focused on adult and children's social care, SEND and homelessness. Ultimately spending is increasingly concentrated on fewer people, so councils are less able to support local and national agendas on key issues such as housing, economic growth, and climate change

Sound strategic financial management, collaboration with other levels of government and exploring alternative funding sources are vital for local authorities to overcome financial constraints and deliver quality services.

Our value for money audit work across the sector continues to identify significant weaknesses in all criteria of the Code of Audit Practice. This shows that local authorities are facing increasing pressure to provide services while managing change and reducing costs. We understand that the environment in which our audited bodies operate is dynamic and challenging and this understanding allows us to have insightful conversations and adapt our approach to delivering our audit work accordingly.

We know the difficulties and challenges faced within our Local Authority bodies and know there is a focus on improving quality and reducing costs. We will work with you as you strive to deliver these aims.

Key developments impacting our audit approach

Local Context Our Response

2024/25 financial performance

The Council set a balanced revenue budget for 2024-25, which required savings of £18.988m. At quarter 3, the forecast outturn position for the General Fund is an underspend of £2.529m against budget and an underspend of £0.652m for the Housing Revenue Account. 76% of required ongoing efficiencies for 2024-25 are rated as delivered on an ongoing basis, 16% rated as not to be delivered in year and 8% are forecast to be delivered on a one-off basis in year.

We will perform a detailed review of how the authority is ensuring financial sustainability as part of our Value for Money work.

Housing Services

In our 2023/24 Auditor's Annual Report, we reported that key aspects of the Council's arrangements for delivering the Housing Service were not adequate and constitute a significant weakness in the arrangements in place to secure value for money. We recommended that "The Housing transformation programme should focus on addressing the identified weaknesses in the service, that this should be fully delivered within a reasonable timeframe and progress should continue to be closely monitored by members and the senior management team. A Regulatory Judgement reported in October 2024 highlights that there are serious failings in how Sandwell MBC is delivering the outcomes of the consumer standards and significant improvement is needed, specifically in relation to outcomes in Safety and Quality Standards. Based on this assessment, a C3 grade for Sandwell MBC was provided.

As part of our Value For Money review, we will assess the progress being made through the transformation programme to address the identified weaknesses in the service and the failings reported as part of the Regulatory Judgement.

New ledger system implementation

In 2024, the Council migrated the general ledger to Oracle Fusion to enhance efficiency. The 'go live' date was postponed several times to ensure a smooth transition. However, some post-implementation issues have been identified, and the Council is actively addressing them. Implementing a new ledger system is considered high risk and has the potential to delay the preparation of the draft 2024-25 statement of accounts. It is crucial to manage these risks effectively during the implementation process.

We have already reviewed the governance arrangements in place before the 'go-live' date for Oracle Fusion. We will also assess the success of the post-implementation arrangements as part of our Value for Money work. Additionally, our IT Audit Team will carry out detailed procedures to ensure the completeness and accuracy of the data transferred into Oracle Fusion.

Key developments impacting our audit approach (continued)

New accounting standards and reporting developments

- Local authorities will need to implement IFRS 16 Leases from 1 April 2024. The main difference from IAS 17
 will be that leases previously assessed as operating leases by lessees will need to be accounted for on balance sheet as a liability and associated right of use asset. More information can be found on the next slide.
- The FRC issued revisions to ISA (UK) 600 'Audits of group financial statements (including the work of component auditors)'. The revised standard includes new and revised requirements that better aligns the standard with recently revised standards such as ISQM 1, ISA 220 (Revised) and ISA 315 (Revised 2019). The new and revised requirements strengthen the auditor's responsibilities related to professional scepticism, planning and performing a group audit, two-way communications between the group auditor and component auditor, and documentation. The changes are to keep the standard fit for purpose in a wide range of circumstances and the developing environment.
- Detailed review of the Authority's implementation of IFRS 16. More information can be found on the next slide.
- Enhanced procedures in respect of audits of group financial statements such as conducting a detailed
 risk assessment on the components of the group, instructing the component auditor to carry out
 specified audit procedures (where applicable). More information on the group audit can be found at
 Section 4 of this report.

Key developments impacting our audit approach (continued)

Our commitments

- As a firm, we are absolutely committed to audit quality and financial reporting in local government.
 Our proposed work and fee, as set out further in this Audit Plan, has been agreed with the Director of Resources and reflects the PSAA contract.
- To ensure close work with audited bodies and an efficient audit process, our preference as a firm is either for our UK based staff to work on site with you and your staff or to develop a hybrid approach of on-site and remote working.
- We would like to offer a formal meeting with the Chief Executive twice a year, and with the Executive Director of Resources quarterly as part of our commitment to keep you fully informed on the progress of the audit.
- At an appropriate point within the audit, we would also like to meet informally with the Chair of your Audit Committee, to brief them on the status and progress of the audit work to date.
- Our Value for Money work will continue to consider the arrangements in place for you to secure economy, efficiency and effectiveness in the use of your resources.
- We will continue to provide you and your Audit Committee with sector updates providing our insight on issues from a range of sources via our Audit Committee updates.
- We hold annual financial reporting workshops for our audited bodies to access the latest technical guidance and interpretation, discuss issues with our experts and create networking links with other clients to support consistent and accurate financial reporting across the sector.



IFRS 16 Leases



Summary

IFRS 16 Leases is now mandatory for all Local Government (LG) bodies from 1 April 2024. The standard sets out the principles for the recognition, measurement, presentation and disclosure of leases and replaces IAS 17. The objective is to ensure that lessees and lessors provide relevant information in a manner that faithfully represents those transactions. This information gives a basis for users of financial statements to assess the effect that leases have on the financial position, financial performance and cash flows of an entity.

Introduction

IFRS 16 updates the definition of a lease to:

"a contract, or part of a contract, that conveys the right to use an
asset (the underlying asset) for a period of time in exchange for
consideration." In the public sector the definition of a lease is
expanded to include arrangements with nil consideration.

This means that arrangements for the use of assets for little or no consideration (sometimes referred to as peppercorn rentals) are now included within the definition of a lease.

IFRS 16 requires all leases to be accounted for 'on balance sheet' by the lessee (subject to the exemptions below), a major change from the requirements of IAS 17 in respect of operating leases.

There are however the following exceptions:

- leases of low value assets (optional for LG)
- short-term leases (less than 12 months).

Lessor accounting is substantially unchanged leading to asymmetry of approach for some leases (operating). However, if an LG body is an intermediary lessor, there is a change in that the judgement, as to whether the lease out is an operating or finance lease, is made with reference to the right of use asset rather than the underlying asset. The principles of IFRS 16 will also apply to the accounting for PFI assets and liabilities.

Systems and processes

We believe that most LG Bodies will need to reflect the effect of IFRS 16 changes in the following areas:

- · accounting policies and disclosures
- application of judgment and estimation
- related internal controls that will require updating, if not overhauling, to reflect changes in accounting policies and processes
- systems to capture the process and maintain new lease data and for ongoing maintenance
- accounting for what were operating leases
- identification of peppercorn rentals and recognising these as leases under IFRS 16 as appropriate

Planning enquiries

As part of our planning risk assessment procedures, we have held discussions with management to understand the processes undertaken and the likely impact of IFRS16 for 2024-25 The Council's work in this area is ongoing and we have not seen details of any formal implementation plan.

The Backstop

Local Government National Context – The Backstop

On 30 September 2024, the Accounts and Audit (Amendment) Regulations 2024 came into force. This legislation introduced a series of backstop dates for local authority audits. These Regulations required audited financial statements to be published by the following dates:

- for years ended 31 March 2023 and earlier by 13 December 2024;
 and
- for years ended 31 March 2024 by 28 February 2025; and
- for years ended 31 March 2025 by 27 February 2026.

The Statutory Instrument is supported by the National Audit Office's (NAO) new Code of Audit Practice 2024. The backstop dates were introduced with the purpose of clearing the backlog of historic financial statements and enable to the reset of local audit. Where audit work is not complete, this will give rise to a disclaimer of opinion. This means the auditor has not been able to form an opinion on the financial statements.

Local Government National Context - Local Audit Recovery

In the audit reports for the years ended 31 March 2023 and 31 March 2024, a disclaimer of opinion was issued due to the backstop.

As a result, we anticipate that for 2024/25:

 we will have limited assurance over the opening balances for 2024/25. limited assurance over the closing reserves balance also due to the uncertainty over their opening amount.

Although a disclaimer of opinion was issued for both the years ended 31 March 2023 and 31 March 2024, we were able to complete some work on closing balances which will put the Council in a stronger position than most to rebuild assurance over a shorter timescale.

We are in discussion with the NAO and the Financial Reporting Council (FRC) as how we regain assurance. We will work with the Council to rebuild assurance over time.

Our Work

Our initial focus for the audit will be on in-year transactions including income and expenditure, journals, capital accounting, payroll and remuneration and disclosures; and closing balances for 2024/25. Our objective is to begin a pathway to recovery, by providing assurance over the in year 2024/25 transactions and movements, where possible, and those closing balances which can be purely determined in isolation without regard to the opening balance, such as payables and receivables. As guidance is received from the NAO and the FRC, we will formulate a more detailed strategy as to how assurance can be gained on prior years.



02 Introduction and Headlines

Introduction and headlines



Purpose

This document provides an overview of the planned scope and timing of the statutory audit of Sandwell Metropolitan Borough Council ('the Council') for those charged with governance.

Respective responsibilities

The National Audit Office ('the NAO') has issued the Code of Audit Practice ('the Code'). This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities are also set out in the agreed in the Terms of Appointment and Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA), the body responsible for appointing us as auditor of Sandwell Metropolitan Borough Council. We draw your attention to these documents.

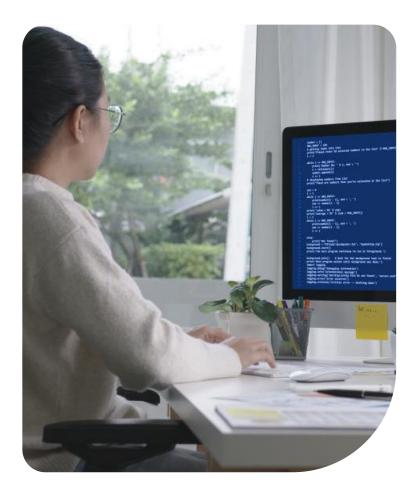
Scope of our Audit

The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on the Council's and Group's financial statements that have been prepared by management with the oversight of those charged with governance (the Audit committee); and we consider whether there are sufficient arrangements in place at the Council for securing economy, efficiency and effectiveness in your use of resources. Value for money relates to ensuring that arrangements are in place to use resources efficiently in order to maximise the outcomes that can be achieved as defined by the Code of Audit Practice.

The audit of the financial statements does not relieve management or the Audit Committee of your responsibilities. It is the responsibility of the Council to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Council is fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of the Council's business and is risk based.

Introduction and headlines (continued)



Significant risks

Those risks requiring special audit consideration and procedures to address the likelihood of a material financial statement error have been identified as:

- Management override of control
- Valuation of land and buildings
- Valuation of council dwellings
- Valuation of investment properties
- · Valuation of pension fund net liability

We have rebutted the presumed significant risks in relation to revenue and expenditure recognition.

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Audit Findings (ISA 260) Report.

Group Audit

The Council prepares group financial statements that consolidate the financial information of Sandwell Children Trust.

Materiality

We have determined planning materiality to be £16.5m (PY £12.8m) for the Council which equates to 1.72% of your prior year gross operating costs for the year. For the group, we have determined planning materiality as £17.5m (PY £13.5m), which equates to 1.8% of the Group's prior year operating costs for the year. We are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. Clearly trivial has been set at £0.825m for the Council (PY £0.640m) and £0.875m for the group (PY £0.675m).

We have also set a specific materiality on a qualitative basis for the disclosure relating to senior officers' remuneration.

Value for Money arrangements

Our risk assessment regarding arrangements to secure value for money has identified the following three risks of significant weakness:

- Implementation of the new ledger system (Oracle Fusion)
- Timeliness of drafting and publishing the statement of accounts
- Delivery of the Housing Service

Further details are set out at section 9 of this report.

Audit logistics

Our interim visit has taken place, and our final visit will start in July 2025. Our key deliverables are this Audit Plan, our Audit Findings Report, our Auditor's Report and Auditor's Annual Report.

Our scale fee for the audit is £631,933 for the Council, subject to the Council delivering a good set of financial statements and working papers and no significant new financial reporting matters arising that require additional time and/or specialist input. On page 43 we provide an estimate of additional fees expected at this planning stage.

We have complied with the Financial Reporting Council's Ethical Standard (revised 2024) 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

© 2025 Grant Thornton UK LLP relating to senior officers' remuneration.

03 Identified risks

Significant risks identified

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

Significant risk	Risk relates to	Audit team's assessment	Planned audit procedures
Management override of controls	Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management override of controls is present in all entities.	The Council faces external scrutiny of its spending, and this could potentially place management under undue pressure in terms of how they report performance. We, therefore, identified management override of control, in particular journals, management estimates, and transactions, outside the course of business as a significant risk	 We will: evaluate the design effectiveness of management controls over journals analyse the journals listing and determine the criteria for selecting high risk unusual journals test unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration gain an understanding of the accounting estimates and critical judgements applied made by management and consider their reasonableness evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions



"In determining significant risks, the auditor may first identify those assessed risks of material misstatement that have been assessed higher on the spectrum of inherent risk to form the basis for considering which risks may be close to the upper end. Being close to the upper end of the spectrum of inherent risk will differ from entity to entity and will not necessarily be the same for an entity period on period. It may depend on the nature and circumstances of the entity for which the risk is being assessed. The determination of which of the assessed risks of material misstatement are close to the upper end of the spectrum of inherent risk, and are therefore significant risks, is a matter of professional judgment, unless the risk is of a type specified to be treated as a significant risk in accordance with the requirements of another ISA (UK)." (ISA (UK) 315).

In making the review of unusual significant transactions "the auditor shall treat identified significant related party transactions outside the entity's normal course of business as giving rise to significant risks." (ISA (UK) 550).



Management should expect engagement teams to challenge them in areas that are complex, significant or highly judgmental which may be the case for accounting estimates, going concern, related parties and similar areas. Management should also expect to provide engagement teams with sufficient evidence to support their judgments and the approach they have adopted for key accounting policies referenced to accounting standards or changes thereto.

Where estimates are used in the preparation of the financial statements management should expect teams to challenge management's assumptions and request evidence to support those assumptions.

Significant risk	Risk relates to	Audit team's assessment	Planned audit procedures
The revenue cycle includes fraudulent transactions (rebutted)	Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due	Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Authority, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:	Notwithstanding that we have rebutted this risk, we will still undertake a significant level of work on the Council and Group's revenue streams, as they are material. We will:
	to the improper recognition of	there is little incentive to manipulate revenue recognition	Accounting policies and systems
	revenue	 opportunities to manipulate revenue recognition are very limited 	• evaluate the Council's accounting policies for recognition of income and
		 the culture and ethical frameworks of local authorities, including Sandwell Metropolitan Borough Council, mean that all forms of fraud are seen as 	expenditure for its various income streams and compliance with the CIPFA Code
		unacceptable. Therefore, we do not consider this to be a significant risk for Sandwell	 update our understanding of the Council's business processes associated with accounting for income
		Metropolitan Borough Council.	Fees, charges and other service income
			Agree, on a sample basis, income and year end receivables from other income to invoices and cash payment or other supporting evidence.
			Taxation and non-specific grant income
			 Income for national non-domestic rates and council tax is predictable and therefore we will conduct substantive analytical procedures
			 For other grants we will sample test items back to supporting information and subsequent receipt, considering accounting treatment where appropriate.
			We will also design tests to address the risk that income has been understated, by not being recognised in the current financial year.

The expenditure cycle includes fraudulent

Significant risk

Practice Note 10 (PN10) states that as most public bodies are transactions (rebutted) net spending bodies, then the risk of material misstatements due to fraud related to expenditure may be greater than the risk of material misstatements due to fraud related to revenue recognition. As a result under PN10, there is a requirement to consider the risk that expenditure may be misstated due to the improper recognition of expenditure.

Risk relates to

Audit team's assessment

We have rebutted this risk for Sandwell Metropolitan Borough Council because:

- expenditure is primarily related to employee costs
- lack of incentive to manipulate financial results, coupled with an overall strong control environment.

We therefore do not consider this to be a significant risk for Sandwell Metropolitan Borough Council.

Planned audit procedures

Notwithstanding that we have rebutted this risk, we will still undertake a significant level of work on the Council's expenditure streams, as they are material. We will carry out the following audit procedures:

- update our understanding of the Council's business processes associated with accounting for expenditure
- perform testing over post year end transactions to assess completeness of expenditure recognition.
- test a sample of operating expenses to gain assurance in respect of the accuracy and occurrence of expenditure recorded during the financial year.

Significant risk	Risk relates to	Audit team's assessment	Planned audit procedures
Valuation of other land and buildings	Council	The Authority revalue its land and buildings as a minimum on a rolling five-yearly basis with interim reviews. If the value of an asset class is projected to materially change during the period since the last	We will:
			 evaluate management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work
		valuation, then further valuations are instructed.	 evaluate the competence, capabilities and objectivity of the valuation expert
		This valuation represents a significant estimate by management in the financial statements due to the size	 write to the valuer to confirm the basis on which the valuation is carried out to ensure that the requirements of the CIPFA Code are met
		of the numbers involved and the sensitivity of this estimate to changes in key assumptions. Additionally, management will need to ensure the carrying value in	 challenge the information and assumptions used by the valuer to assess completeness and consistency with our understanding
	the Authority and group financial s materially different from the curren value (for surplus assets) at the find date, where a rolling programme is We therefore identified valuation of buildings, particularly revaluations a significant risk, which was one of	the Authority and group financial statements is not materially different from the current value or the fair	 engage our own valuer to assess the instructions to the Council's valuer, the Council valuer's report and the methodology and assumptions that underpin the valuation;
		date, where a rolling programme is used.	• test revaluations made during the year to see if they have been input correctly into the Authority's asset register
		We therefore identified valuation of other land and buildings, particularly revaluations and impairments, as a significant risk, which was one of the most significant assessed risks of material misstatement.	 evaluate the assumptions made by management for those assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value at year end
Valuation of council	Council	The Authority is required to revalue council dwellings	We will:
dwellings		annually. The Authority uses the "Beacon Approach" where representative properties are revalued, rather than each individual property. A social discount factor is then applied	• evaluate management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work
		to reflect the fact that the properties cannot be sold on the	 evaluate the competence, capabilities and objectivity of the valuation expert
	This va manag the nur	open market. This valuation represents a significant estimate by management in the financial statements due to the size of the numbers involved and the sensitivity of this estimate to changes in key assumptions.	 write to the valuer to confirm the basis on which the valuation is carried out to ensure that the requirements of the CIPFA Code are met
			 challenge the information and assumptions used by the valuer to assess completeness and consistency with our understanding
		We therefore identified valuation of council dwellings, particularly revaluations and impairments, as significant	 consider and evaluate the reasonableness of the Beacon properties, to which other properties were allocated, and the appropriateness of variances thereto
		risk.	• engage our own valuer to assess the instructions to the Council's valuer, the Council valuer's report and the

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methodology and assumptions that underpin the valuation;

• test revaluations made during the year to see if they have been input correctly into the Authority's asset

Significant risk	Risk relates to	Audit team's assessment	Planned audit procedures
Valuation of Investment Council Properties	Council	Council The Council is required to revalue its investment property annually. This valuation represents a significant estimate by management in the financial statements due to the size of the numbers involved and the sensitivity of this estimate to changes	We will: • evaluate management's processes and assumptions for the calculation of the estimate, the
			instructions issued to valuation experts and the scope of their work;
			 evaluate the competence, capabilities and objectivity of the valuation expert
		in key assumptions.	 write to the valuer to confirm the basis on which the valuation is carried out to ensure that the requirements of the CIPFA Code are met
		We have therefore identified valuation of investment properties, as a significant risk, which was one of the most significant	challenge the information and assumptions used by the valuer to assess completeness and
		assessed risks of material misstatement.	consistency with our understanding
			 engage our own valuer to assess the instructions to the Council's valuer, the Council valuer's report and the methodology and assumptions that underpin the valuation
			 test revaluations made during the year to see if they had been input correctly into the Council's balance sheet
		 ensure that any RICS guidance in relation to material uncertainty around property valuations has been considered by the valuer and is appropriately reflected in the financial statements. 	

Significant risk	Risk relates to	Audit team's assessment	Planned audit procedures
Valuation of the	Council	The Authority pension fund net liability, as reflected in its balance	We will:
pension fund net liability		sheet as the net defined benefit liability, represents a significant estimate in the financial statements. The pension fund net liability is considered a significant estimate due to the size of the numbers involved and the sensitivity of the estimate to changes in key	 update our understanding of the processes and controls put in place by management to ensure that the Authority's pension fund net liability is not materially misstated and evaluate the design of the associated controls
		assumptions. The methods applied in the calculation of the IAS 19 estimates are	 evaluate the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work
		routine and commonly applied by all actuarial firms in line with the requirements set out in the Code of practice for local government accounting (the applicable financial reporting framework). We have therefore concluded that there is not a significant risk of material misstatement in the IAS 19 estimate due to the methods and models used in their calculation. The source data used by the actuaries to produce the IAS 19 estimates is provided by administering authorities and employers. We do not consider this to be a significant risk as this is easily verifiable.	 assess the competence, capabilities and objectivity of the actuary who carried out the Authority's pension fund valuation
	have therefore concluded that there is not a significant risk of material misstatement in the IAS 19 estimate due to the methods and models used in their calculation. The source data used by the actuaries to produce the IAS 19 estimates is provided by administering authorities and employers. We do not consider this to be a significant risk as this is easily		 assess the accuracy and completeness of the information provided by the Authority to the actuary to estimate the liability
			 test 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
			undertake 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 actuary (as auditor's expert).
			procedures suggested within the report
		change in the key assumptions (discount rate, inflation rate, salary	 Review the IFRIC14 calculations to understand if there is any asset ceiling which may impact the overall net defined liability position
		 obtain assurances from the auditor of West Midlands 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. Evaluate any issues reported by the pension fund auditor. 	

Other risks identified

Other risks are, in the auditor's judgement, those where the likelihood of material misstatement cannot be reduced to remote, without the need for gaining an understanding of the associated control environment, along with the performance of an appropriate level of substantive work. The risk of misstatement for another risk is lower than that for a significant risk, and they are not considered to be areas that are highly judgemental, or unusual in relation to the day-to-day activities of the business.

Risk	Description	Planned audit procedures
Financial statements level risk	Historical issues with turnover of staff within the finance function, late accounts and quality of the financial statements.	We consider that there is increased risk of error in the financial statements compared to other local authorities, based on our experience of audit at Sandwell MBC over the last few years. We will address this risk through materiality, specifically setting a lower performance materiality which will increase the number of items selected for testing.
Completeness, existence and accuracy of cash and cash equivalents	The receipt and payment of cash represents a significant class of transactions occurring throughout the year, culminating in the year-end balance for cash and cash equivalents reported on the statement of financial position.	 We will: Agree all period end bank balances to the general ledger and cash book; Agree cash and cash equivalents to the bank reconciliations;
	Due to significance of cash transactions to the council, we identified the completeness, existence and accuracy of cash and cash equivalents as a risk requiring special audit consideration.	 Agree all material reconciling items to sufficient and appropriate corroborative audit evidence; Write to the bank and obtain a bank balance confirmation; Agree the aggregate cash balance to the relevant financial statement disclosures.
Senior Officer Remuneration	With a lower materiality applied owing to the sensitivities around these disclosures, there is heightened risk that a material misstatement may occur.	 We will: Gain an understanding of the process used for recording Senior Officers Remuneration and evaluate the procedures; Agree, on a sample basis, entries in the remuneration report to payroll evidence and pension disclosures.
Completeness of non- pay operating expenses and payables	Non-pay expenses on goods and services represent a significant percentage of the Council's operating expenses. Management uses judgement to estimate accruals of costs yet to be invoiced. There is a high instance of these estimated accruals at the year-end.	 We will: Evaluate the Council's accounting policy for recognition of non-pay expenditure for appropriateness; Gain an understanding of the Council's system for accounting for non-pay expenditure and evaluate the design of the associated controls; Test a sample of balances included within trade and other payables; Test a sample of payments immediately prior to and after the year end to ensure that appropriate cut-off has been applied and therefore that the expenditure has been recognised in the correct period.



"The auditor determines whether there are any risks of material misstatement at the assertion level for which it is not possible to obtain sufficient appropriate audit evidence through substantive procedures alone. The auditor is required, in accordance with ISA (UK) 330 (Revised July 2017), to design and perform tests of controls that address such risks of material misstatement when substantive procedures alone do not provide sufficient appropriate audit evidence at the assertion level. As a result, when such controls exist that address these risks, they are required to be identified and evaluated." (ISA (UK) 315)

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Other risks identified (continued)

Other risks are, in the auditor's judgement, those where the likelihood of material misstatement cannot be reduced to remote, without the need for gaining an understanding of the associated control environment, along with the performance of an appropriate level of substantive work. The risk of misstatement for another risk is lower than that for a significant risk, and they are not considered to be areas that are highly judgemental, or unusual in relation to the day-to-day activities of the business.

Risk	Description	Planned audit procedures
New system implementation	During 2024, the Council migrated the General Ledger to Oracle Fusion	We have already reviewed the governance arrangements in place before the 'go-live' date for Oracle Fusion. We will also assess the success of the post-implementation arrangements as part of our Value for Money work. Additionally, our IT Audit Team will carry out detailed procedures to ensure the completeness and accuracy of the data transferred into Oracle Fusion.
IFRS16 Implementation	IFRS 16 is now mandatory for all Local Government (LG) bodies	We will:
	from 1 April 2024. This Standard sets out the principles for the recognition, measurement, presentation and disclosure of leases and replaces IAS17. The objective is to ensure that lessees and lessors provide relevant information in a manner that faithfully represents those transactions. This information gives a basis for users of financial statements to assess the effect that leases have on the financial position, financial performance and cash flows of an entity.	 Review the Council's implementation plan and assess the process followed to transition to IFRS 16, ensuring compliance with the standard's requirements.
		 Assess the design effectiveness of internal controls related to the identification, measurement, and disclosure of leases under IFRS 16.
		• Verify the accuracy and completeness of lease data by performing substantive testing of lease agreements, lease payments, and related documentation.
		Review the application of judgement and estimation carried out by management
		• Review the Council's disclosures related to leases under IFRS 16 to ensure completeness, accuracy, and compliance with the standard's disclosure requirements.



"The auditor determines whether there are any risks of material misstatement at the assertion level for which it is not possible to obtain sufficient appropriate audit evidence through substantive procedures alone. The auditor is required, in accordance with ISA (UK) 330 (Revised July 2017), to design and perform tests of controls that address such risks of material misstatement when substantive procedures alone do not provide sufficient appropriate audit evidence at the assertion level. As a result, when such controls exist that address these risks, they are required to be identified and evaluated." (ISA (UK) 315)

Other matters

Other work

In addition to our responsibilities under the Code of Practice, we have a number of other audit responsibilities, as follows:

- We read your Narrative Report and Annual Governance Statement and any other information published alongside your financial statements to check that they are consistent with the financial statements on which we give an opinion and our knowledge of the Council.
- We carry out work to satisfy ourselves that disclosures made in your Annual Governance Statement are in line with requirements set by CIPFA.
- We carry out work on your consolidation schedules for the Whole of Government Accounts process in accordance with NAO group audit instructions.
- We consider our other duties under legislation and the Code, as and when required, including:
 - giving electors the opportunity to raise questions about your financial statements, consider and decide upon any objections received in relation to the financial statements;
 - issuing a report in the public interest or written recommendations to the Council under section 24 of the Local Audit and Accountability Act 2014 (the Act);
 - application to the court for a declaration that an item of account is contrary to law under section 28 or a judicial review under section 31 of the Act;
 - issuing an advisory notice under section 29 of the Act.
- We certify completion of our audit.

Other material balances and transactions

Under International Standards on Auditing, 'irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure'. All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the risks identified in this report.

04 Group Audit

Group audit scope and risk assessment

In accordance with ISA (UK) 600 Revised, as group auditor we are required to obtain sufficient appropriate audit evidence regarding the financial information of the components and the consolidation process to express an opinion on whether the group financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework.

Component	Risk of material misstatement to the group	Planned audit approach and level of response required under ISA (UK) 600 Revised	Response performed by	Risks identified	Auditor
Sandwell MBC	Yes	Full scope audit performed by Grant Thornton UK LLP	Group auditor	 Management override of control Valuation of land and buildings Valuation of council dwellings Valuation of Investment property Valuation of pension fund net liability 	Grant Thornton UK
Sandwell Children Tru	st Yes	Specific audit procedures	Component auditor	Management override of control	Grant Thornton UK

Involvement in the work of component auditors

In order to use the work of the component auditor, we will require the ability to access relevant component auditor documentation to complete the group audit. The nature, time an extent of our Involvement in the work of the component auditor will begin with a discussion on risks, guidance on designing procedures, participation in meetings, followed by the review of relevant aspects of the component auditor documentation and meeting with appropriate members of management. We will also require that the component auditor is independent under the independence requirements of the FRC and this may be stricter than the requirements for completing their local reports.

If we are unable to secure access to the component auditor's working papers, we will report the impact of such impediments on the audit of the group financial statements. Where a member of the Grant Thornton International network is involved, we will communicate to them your policy on non-audit services. You will ensure that each component entity within your group is aware of your policy.

Fraud and litigation

We have not been made aware of any actual or attempted frauds in the year during our planning procedures performed to date. Should any factors arise in relation to fraud risk or actual or attempted fraud we ask that you inform us of this at the earliest possible opportunity.

05 Our approach to 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.

Matter	Description	Planned audit procedures
01	Determination We have determined planning materiality (financial statement materiality for the planning stage of the audit) based on professional judgement in the context of our knowledge of the Council and Group, including consideration of factors such as stakeholder expectations, industry developments, financial stability and reporting requirements for the financial statements	 We determine planning materiality in order to: establish what level of misstatement could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements assist in establishing the scope of our audit engagement and audit tests determine sample sizes and assist in evaluating the effect of known and likely misstatements in the financial statements
02	Other factors An item does not necessarily have to be large to be considered to have a material effect on the financial statements	An item may be considered to be material by nature when it relates to: instances where greater precision is required We have identified senior officer remuneration as a balance where we will apply a lower materiality level, as these are considered sensitive disclosures. We have set a planning materiality of £0.020m.
03	Reassessment of materiality Our assessment of materiality is kept under review throughout the audit process	We reconsider planning materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality
04	Matters we will report to the Audit Committee Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work. Under ISA 260 (UK) 'Communication with those charged with governance', we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. 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 report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work. In the context of the Council and Group, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £0.825m for the Council (PY £0.640m) and £0.875m for the Group (PY £0.675m). If management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Audit Committee to assist it in fulfilling its governance responsibilities/



Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements; Judgments about materiality are made in light of surrounding circumstances, and are affected by the size or nature of a misstatement, or a combination of both; and Judgments about matters that are material to users of the financial statements are based on a consideration of the common financial information needs of users as a group. The possible effect of misstatements on specific individual users, whose needs may vary widely, is not considered. (ISA (UK) 320)

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.

	Group (including the Children's Trust) Amount (£)	Sandwell Metropolitan Borough Council (entity) Amount (£)	Qualitative factors considered
Materiality for the group and entity financial statements	17,500,000	16,500,000	This benchmark is determined as a percentage of the Council's single entity gross revenue expenditure in the prior year (£955m) using 1.72% as a baseline. The Council materiality is no more than 95% of the Group materiality.
Materiality for Senior Officers Remuneration	20,000	20,000	We have identified senior officer remuneration as a balance where we will apply a lower materiality level, as these are considered sensitive disclosure.
Performance Materiality for the group and entity financial statements	10,500,000	9,900,000	Performance Materiality is based on 60% of the overall materiality.



06 IT audit strategy

IT audit strategy

In accordance with ISA (UK) 315, we are required to obtain an understanding of the IT environment related to all key business processes, identify all risks from the use of IT related to those business process controls judged relevant to our audit and assess the relevant IT general controls (ITGCs) in place to mitigate them. Our audit will include completing an assessment of the design and implementation of ITGCs related to security management; technology acquisition, development and maintenance; and technology infrastructure.

The following IT applications are in scope for IT controls assessment based on the planned financial statement audit approach, we will perform the indicated level of assessment:

IT application	Audit area	Planned level IT audit assessment	
Oracle SBS	Financial reporting	 Detailed understanding of the IT general controls covering the design and implementation effectiveness. 	
		 Evaluate changes to the design and implementation effectiveness for security management; change management and technology infrastructure controls. 	
		 Perform high level walkthroughs, inspected supporting documentation and analysis of configurable controls in the above areas. 	

In addition, due to the significant change during the period, specifically the new system implementation, additional audit procedures will be completed to address the additional risks of material misstatement identified.

IT application	Event	Relevant risks	Planned IT audit procedures
Oracle Fusion	New system implementation	Post migration data completeness and accuracy; system functionality operating to design.	Obtain an understanding of the process used for new system implementation
			Audit of data migration activity and results
			• Detailed understanding of the IT general controls covering the design and implementation effectiveness.
			 Evaluate changes to the design and implementation effectiveness for security management; change management and technology infrastructure controls.
			 Perform high level walkthroughs, inspected supporting documentation and analysis of configurable controls in the above areas.

07 Interim audit work

Interim Audit Work

In order to return to an audit cycle that delivers the audit opinion by thee statutory deadline, our aim is to complete the annual opinion audit by the end of December. A key component of this is to undertake an effective interim audit. We agreed with management that in the period January to April we would:

- Complete the planning and risk assessment work
- Finalise the sample testing started on the 2023/24 closing balances to provide assurance on opening balances going forward
- Undertake an effective interim audit to bring forward testing of in-year income and expenditure transactions putting us in a strong position to start the closing balances audit on receipt of the draft accounts.

We have completed most of our planning work, enabling us to issue this draft plan. However, we have been not been able to progress the interim work as we had hoped. We summarise below the areas where we have been unable to progress as planned.

Description	Work commentary
Opening balances	We sought to finalise work started during the 2023-24 audit where we were unable to complete due to the imposed backstop date. By completing this work, we will gain assurance over more of the opening balances in the 2024-25 accounts. This includes the following areas: Fees and Charges income, Other expenditure, Grant income, Borrowings and Investments, Debtors, Allowance for impaired debt and Creditors. As at 22 April 2025, our work remains incomplete for other expenditure, grant income and creditors with testing over a small number of sampled items not yet finalised.
External confirmations	We planned to send out all necessary external confirmations relating to bank and cash balances, investments and borrowings. Unfortunately, the necessary account details have not been supplied to enable us to do this at interim.
Payroll analytical procedures	We requested:
	 a new starters listing to select a sample and agree to source documentation and review payroll processing for item sampled;
	 a leavers listing to select a sample and agree to source documentation to ensure the employee was removed from payroll at correct date;
	 payroll change data to select a sample and agree to source documentation and review payroll processing for item sampled;
	gross to net payroll reports; and
	evidence to support pay increases applied in year.
	The gross to net reports supplied were incomplete and change in circumstances listings were not provided. As a result, we have not been able to complete this work.
Valuation of land and buildings	As part of our work to plan our year-end testing of land and building valuations, we have not received any evidence regarding the source data provided to the valuers for the valuations. Additionally, we inquired about the length of valuer's engagement and whether the Council has complied with re-tender guidelines, but we have not received a response.
Rights obligations and existence testing	We requested a copy of the fixed asset register to select samples for existence testing, but it has not been received.
	We selected a sample of assets to confirm ownership. We requested the Land Registry title number from the Council to verify ownership but this information has not been provided yet. Additionally, we requested photographic evidence for another sample of assets to confirm their existence, but this has not been received either.

Interim Audit Work (continued)

Description	Work commentary
PPE additions & disposals - Months 1-9	We requested a breakdown of additions and disposals in months 1 to 9 of 2024/25. However, this was not received.
Other expenditure & accounts payables	We requested information to gain an understanding of internal controls that have been implemented to provide the Council with assurance over completeness of expenditure and account payables. This information has not been provided so we have not been able to complete our work on evaluating the design of the Council's processes and relevant controls in this area.
Cash and bank	We requested copies of bank reconciliations for September 2024 and January 2025 to perform a walkthrough of the Council's cash and banking process, but we have not received a response.
Treasury pooling arrangement	We also asked the Council for a document explaining the rationale for the accounting of this treasury pooling arrangement, but we are still awaiting a response.
PFI Models	We requested updated PFI models for 2024/25 so that we can share with our PFI experts for review, but we have not received a response.
Pensions data submission	We requested a copy of final submission to the Council's actuary, but we have not received a response.
Housing benefits expenditure	We requested a housing benefits payment reports to enable a sample to be selected for early testing. We received the private tenants' payments report but the Housing Revenue Account report remains outstanding.
Precepts and levies	We requested precept letters but we have not received a response.
Council Tax reliefs. NNDR reliefs	We requested listings of Council Tax and NNDR reliefs applied during 2024/25, but these were not received.

08 Value for Money Arrangements

Value for Money Arrangements

Approach to Value for Money work for the period ended 31 March 2025

The National Audit Office issued its latest Value for Money guidance to auditors in November 2024. The Code expects auditors to consider whether a body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are expected to report any significant weaknesses in the body's arrangements, should they come to their attention. In undertaking their work, auditors are expected to have regard to three specified reporting criteria. These are as set out below:



Financial sustainability

How the body plans and manages its resources to ensure it can continue to deliver its services.



Governance

How the body ensures that it makes informed decisions and properly manages its risks.



Improving economy, efficiency and effectiveness

How the body uses information about its costs and performance to improve the way it manages and delivers its services.



Risks of significant VFM weaknesses



As part of our initial planning work, we considered whether there were any risks of significant weakness in the body's arrangements for securing economy, efficiency and effectiveness in its use of resources that we needed to perform further procedures on. The risks we have identified are detailed on the table overleaf along with the further procedures we will perform. We will continue to review the body's arrangements and report any further risks of significant weaknesses we identify to those charged with governance. We may need to make recommendations following the completion of our work. The potential different types of recommendations we could make are set out in the second table below.

Potential types of recommendations

A range of different recommendations could be made following the completion of work on risks of significant weakness, as follows:



Statutory recommendation

Recommendations to the body under Section 24 (Schedule 7) of the Local Audit and Accountability Act 2014. A recommendation under schedule 7 requires the body to discuss and respond publicly to the report.



Key recommendation

The Code of Audit Practice requires that where auditors identify significant weaknesses in arrangements to secure value for money they should make recommendations setting out the actions that should be taken by the body. We have defined these recommendations as 'key recommendations'.



Improvement recommendation

These recommendations, if implemented should improve the arrangements in place at the body, but are not made as a result of identifying significant weaknesses in the body's arrangements.

Risks of significant weakness in VFM arrangements (continued)

Risk assessment of the Council's VFM arrangements

The Code of Audit Practice 2024 (the Code) sets out that the auditor's work is likely to fall into three broad areas: planning; additional risk-based procedures and evaluation; and reporting. We undertake initial planning work to inform this Audit Plan and the assumptions used to derive our fee. Consideration of prior year significant weaknesses and known areas of risk is a key part of the risk assessment for 2024/25. We will continue to evaluate risks of significant weakness and if further risks are identified, we will report these to those charged with governance. We set out our reported assessment below:

____

Criteria	2023/	24 Auditor judgement on arrangements	2024/25 risk assessment	2024/25 risk-based procedures
Financial sustainability	А	No significant weakness in arrangements identified but four improvement recommendations made.	No risks of significant weakness identified	As no risk of significant weakness has been identified, no additional risk-based procedures are specified at this stage. We will undertake sufficient work to document our understanding of your arrangements as required by the Code and follow up improvement recommendations made in 2023/24
Governance		Although they persisted during 2023/24, the Council has made diligent efforts to address significant weakness in its ongoing arrangements from previous years. These weaknesses included the delayed production of financial statements and the integration of actions in response to key recommendations raised in our Governance Review Follow Up (Dec 2023) up to March 2024. We commend the Council for the progress made in resolving the remaining key recommendations, particularly in the production of draft accounts for 2022/23 and 2023/24. While no further significant weaknesses in arrangements were identified, two new improvement recommendations were made.	In 2024, the Council migrated the general ledger to Oracle Fusion to enhance efficiency. The 'go live' date was postponed several times to ensure a smooth transition. However, some postimplementation issues have been identified, and the Council is actively addressing them.	based procedures to assess whether a significant weakness exists. We have already reviewed the governance arrangements in place before the 'go-live' date for Oracle Fusion. We will also assess the success of the post-implementation arrangements as part of our Value for Money work. We will also liaise and align our work with that completed by our IT Audit Team.

We will continue our review of your arrangements until we sign the opinion on your financial statements before we issue our auditor's annual report. Should any further risks of significant weakness be identified, we will report this to those charged with governance as soon as practically possible. We report our value for money work in our Auditor's Annual Report. Any significant weaknesses identified once we have completed our work will be reflected in your Auditor's Report and included within our audit opinion.

G No significant weaknesses in arrangements identified or improvement recommendation made.

A No significant weaknesses in arrangements identified, but improvement recommendations made.

Significant weaknesses in arrangements identified and key recommendations made.

Risks of significant weakness in VFM arrangements (continued)

Risk assessment of the Council's VFM arrangements

The Code of Audit Practice 2024 (the Code) sets out that the auditor's work is likely to fall into three broad areas: planning; additional risk-based procedures and evaluation; and reporting. We undertake initial planning work to inform this Audit Plan and the assumptions used to derive our fee. Consideration of prior year significant weaknesses and known areas of risk is a key part of the risk assessment for 2024/25. We will continue to evaluate risks of significant weakness and if further risks are identified, we will report these to those charged with governance. We set out our reported assessment below:

Criteria 2023/24 Auditor judgement on arrangements

2024/25 risk assessment

2024/25 risk-based procedures

Improving economy, efficiency and effectiveness

The significant weakness in arrangements concerning Housing Service has Risk of significant weakness in arrangements persisted from the prior year and remains applicable to 2023/24. However, we acknowledge the substantial improvements made in strengthening arrangements in the current year. Additionally, no further significant weaknesses in arrangements were identified, although two new improvement recommendations were made.

In our 2023/24 Auditor's Annual Report, we reported that key aspects of the Council's arrangements for delivering the Housing Service were not adequate and constitute a significant weakness in the arrangements in place to secure value for money. A Regulatory Judgement reported in October 2024 highlights that there are serious failings in how Sandwell MBC is delivering the outcomes of the consumer standards and significant improvement is needed, specifically in relation to outcomes in Safety and Quality Standards. Based on this assessment, a C3 grade for Sandwell MBC was provided. We have therefore concluded that the risk of significant weakness remains in place.

Given the risk of significant weakness identified, we will undertake additional risk-based procedures to assess whether a significant weakness exists. This will focus on a review of documentation and discussion with relevant Officers to consider and assess the progress being made through the transformation programme to address the identified weaknesses in the service and the failings reported as part of the Regulatory Judgement.

We will continue our review of your arrangements until we sign the opinion on your financial statements before we issue our auditor's annual report. Should any further risks of significant weakness be identified, we will report this to those charged with governance as soon as practically possible. We report our value for money work in our Auditor's Annual Report. Any significant weaknesses identified once we have completed our work will be reflected in your Auditor's Report and included within our audit opinion.

- **G** No significant weaknesses in arrangements identified or improvement recommendation made.
- No significant weaknesses in arrangements identified, but improvement recommendations made.
- Significant weaknesses in arrangements identified and key recommendations made.

9 Logistics

Logistics



Key elements

- Planning meeting with management to set audit scope
- Planning requirements checklist to management
- Agree timetable and deliverables with management and Audit Committee

Key elements

- Document design effectiveness of systems and processes
- Review of key judgements and estimates
- Issue Audit progress report and sector update to management and Audit Committee
- Any planned additional testing.
- Issue the Audit Plan to management and Audit Committee

Key elements

- Audit teams onsite to complete fieldwork and detailed testing
- Weekly update meetings with management

Key elements

- Draft Audit Findings issued to management
- Audit Findings meeting with management
- 'Hot review' of the financial statements
- Audit Findings presentation to Audit Committee
- Auditor's Annual Report
- Finalise and sign financial statements and audit report]

Our team and communications

Grant Thornton core team

Andrew Smith

Engagement Lead, Key Audit Partner

- Key contact for senior management and Audit and Governance Committee
- Overall quality assurance

Zoe Thomas

Senior Audit Manager

- Audit planning
- Resource management
- Audit reporting

Lisa Mackenzie

Senior VFM Manage

- VFM audit planning
- VFM audit fieldwork
- VFM audit reporting

Boniswa Yende

Technology Manager

- IT audit planning
- IT audit fieldwork
- IT audit reporting

Matthew Berrisford

Audit Senior / In-charge

- On-site audit team management
- Day-to-day point of contact
- Audit fieldwork

Pool of audit specialists including IT and financial modelling.

	Service delivery	Audit reporting	Audit progress	Technical support
Formal communications	Annual client service review	 The Audit Plan Audit Progress and Sector Update Reports The Audit Findings Auditor's Annual Report 	Audit planning meetingsAudit clearance meetingsCommunication of issues log	Technical updates
Informal communications	Open channel for discussion		Communication of audit issues as they arise	Notification of up-coming issues

As part of our overall service delivery, we may utilise colleagues who are based overseas, primarily in India and the Philippines. Those colleagues work on a fully integrated basis with our team members based in the UK and receive the same training and professional development programmes as our UK based team. They work as part of the engagement team, reporting directly to the Audit Senior and Manager and will interact with you in the same way as our UK based team albeit on a remote basis. Our overseas team members use a remote working platform which is based in the UK. The remote working platform (or Virtual Desktop Interface) does not allow the user to move files from the remote platform to their local desktop meaning all audit related data is retained within the UK.

10 Fees and related matters

Our fee estimate

Our estimate of the audit fees is set out in the table across, along with the fees billed in the prior year

Relevant professional standards

In preparing our fee estimate, we have had regard to all relevant professional standards, including paragraphs 4.1 and 4.2 of the FRC's Ethical Standard (revised 2024) which stipulate that the Engagement Lead (Key Audit Partner) must set a fee sufficient to enable the resourcing of the audit with partners and staff with appropriate time and skill to deliver an audit to the required professional and Ethical standards.

PSAA

Local Government Audit fees are set by PSAA as part of their national procurement exercise. In 2023 PSAA awarded a contract of audit for Sandwell Metropolitan Borough Council to begin with effect from 2023/24. The scale fee set out in the PSAA contract for the 2024/25 audit is £631,933.

This contract sets out four contractual stage payments for this fee, with payment based on delivery of specified audit milestones:

- Production of the final auditor's annual report for the previous Audit Year (exception for new clients in 2023/24 only)
- Production of the draft audit planning report to Audited Body
- 50% of planned hours of an audit have been completed
- 75% of planned hours of an audit have been completed

Any variation to the scale fee will be determined by PSAA in accordance with their procedures as set out here Fee Variations Overview – PSAA

Updated Auditing Standards

The FRC has issued updated Auditing Standards in respect of Quality Management (ISQM 1 and ISQM 2). It has also issued an updated Standard on quality management for an audit of financial statements (ISA 220). We confirm we will comply with these standards.

Company	Audit Fee for 2023/24	Audit Fee for 2024/25
	(£)	(£)
Sandwell Metropolitan Borough Council Audit*	262,450	631,933
ISA 315	12,550	N/a – now included in scale fee
IFRS 16	0	Estimate 10,000
New ledger/data transfer	0	Estimate 10,000
Sandwell Children's Trust Audit	36,000	Currently being agreed

*Includes backstop fee reduction of £322,972

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Our fee estimate (contd.)

Our fee estimate:

We have set out below our specific assumptions made in arriving at our estimated audit fees, we have assumed that the Council will:

- Prepare a good quality set of accounts, supported by comprehensive and well presented working papers which are ready at the start of the audit
- Provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made during the course of preparing the financial statements
- Provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements
- Maintain adequate business processes and IT controls, supported by an appropriate IT infrastructure and control environment.
- Our fee estimate also assumes that you will engage suitably competent experts to assist management in the following areas:
 - Revaluation of Property, Plant and Equipment and Investment Property.
 - Measurement of the defined pension liability.
 - Financial instrument disclosures.

Previous year

In 2023/24, the scale fee set by PSAA was £585,422. The actual fee charged for the audit was £275,000. The difference between the scale and the final fee reflected additional audit fee of £12,550 relating to the increased audit requirements of ISA315, less a back stop reduction of (£322,972) to reflect a reduction in audit procedures performed.

As the audit opinion on the 2023/24 (and 2022/2023) audit is disclaimed due to the imposition of a backstop date, we may need to undertake further audit work in respect of opening balances. We will discuss the practical implications of this with you should this circumstance arise.

11 Independence considerations

Independence considerations

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant matters that may bear upon the integrity, objectivity and independence of the firm or covered persons (including its partners, senior managers, managers). There are no matters that we are required to report.

As part of our assessment of our independence at planning we note the following matters:

Matter	Conclusions	
Relationships with Grant Thornton	We are not aware of any relationships between Grant Thornton and the Council/Group that may reasonably be thought to bear on our integrity, independence and objectivity.	
Relationships and Investments held by individuals	We have not identified any potential issues in respect of personal relationships with the Council/Group or investments in the Group held by individuals.	
Employment of Grant Thornton staff	We are not aware of any former Grant Thornton partners or staff being employed, or holding discussions in respect of employment, by the Council/Group as a director or in a senior management role covering financial, accounting or control related areas.	
Business relationships	We have not identified any business relationships between Grant Thornton and the Council/Group .	
Contingent fees in relation to non-audit services	No contingent fee arrangements are in place for non-audit services provided.	
Gifts and hospitality	We have not identified any gifts or hospitality provided to, or received from, a member of the Council/Group's board, senior management or staff (that would exceed the threshold set in the Ethical Standard).	

We confirm that there are no significant facts or matters that impact on our independence at planning as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. The firm and each covered person have complied with the Financial Reporting Council's Ethical Standard and 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 Officer's Auditor Guidance Note 01 Issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Following this consideration, we can confirm that we are independent at planning and are able to express an objective opinion on the financial statements. In making the above judgement, we have also been mindful of the quantum of non-audit fees compared to audit fees disclosed in the financial statements and estimated for the current year.

Fees and non-audit services

The following tables below sets out the non-audit services charged from the beginning of the financial year to current date, as well as the threats to our independence and safeguards have been applied to mitigate these threats.

The below non-audit services are consistent with the Council's policy on the allotment of non-audit work to your auditor

None of the below services were provided on a contingent fee basis.

For the purposes of our audit, we have made enquiries of all Grant Thornton teams within the Grant Thornton International Limited network member firms providing services to Sandwell Metropolitan Borough Council. The table summarises all non-audit services which were identified. We have adequate safeguards in place to mitigate the perceived self-interest threat from these fees that is detailed in the table below:

Assurance Service Fees

Service	Fees £ Threats Identified	Safeguards applied
Housing Benefit subsidy certification 2024/25	TBC Self-Interest (because this is a recurring fee) (£71,280 Self review reported in AFR for 2023/24)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work in comparison to the total fee for the audit 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. Our team has no involvement in the preparation of the form which is certified, and do not expect material misstatement in the financial statement to arise from the performance of the certification work. Although related income and expenditure is included within the financial statements, the work required in respect of certification is separate from the work required to the audit of the financial statements and is performed after the audit of the financial statement has been completed.
Teachers Pension 2024/25	£15,000 Self-Interest (because this is a recurring fee) (£25,000 Self review reported in AFR for 2023/24)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work in comparison to the total fee for the audit 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.
Agreed procedures on behalf of Department for Transport	£7,500 Self-Interest (because this is a recurring fee) Self review Management	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work in comparison to the total fee for the audit 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.

This covers all services provided by us and our network to the council, its directors and senior management and its affiliates, and other services provided to other known connected parties that may reasonably be thought to bear on our integrity, objectivity or independence.

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Fees and non-audit services

Assurance Service Fees

Service	Fees £ Threats Identified	Safeguards applied
Rail reform blueprint review	75,000 Self-Interest	The level of this fee taken on its own is not considered a significant threat to independence as the fee for
This work is not directly commissioned by Sandwell MBC but is advisory work by GT are completing for WMRE in relation to the formation of the new Great British Railways company. The fees do not relate to Sandwell MBC but we have documented our safeguards for the service provided.	Self review	this work in comparison to the total fee for the audit 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. We are not producing any reports etc that would lead to figures in the financial statements. The work these services will cover is purely at the preliminary stage before any decision making that would be subject to review as part of the VfM conclusion would take place. Additionally, there is a separate team that does this work and the advisory team would not work on the audit and the audit team would not work on the advisory piece of work.

This covers all services provided by us and our network to the council, its directors and senior management and its affiliates, and other services provided to other known connected parties that may reasonably be thought to bear on our integrity, objectivity or independence.

12 Communication of audit matters with those charged with governance

Communication of audit matters with those charged with governance

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks and Key Audit Matters	•	
Planned use of internal audit	•	
Confirmation of independence and objectivity	•	•
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	•	•
Significant matters in relation to going concern	•	•
Matters in relation to the group audit, including: Scope of work on components, involvement of group auditors in component audits, concerns over quality of component auditors' work, limitations of scope on the group audit, fraud or suspected fraud	•	•
Views about the qualitative aspects of the Council/Group's accounting and financial reporting practices including accounting policies, accounting estimates and financial statement disclosures		n/a
Significant findings from the audit		•
Significant matters and issue arising during the audit and written representations that have been sought		•
Significant difficulties encountered during the audit		•
Significant deficiencies in internal control identified during the audit		•
Significant matters arising in connection with related parties		•
Identification or suspicion of fraud involving management and/or which results in material misstatement of the financial statements		•
Non-compliance with laws and regulations		•
Unadjusted misstatements and material disclosure omissions		•

ISA (UK) 260, as well as other ISAs (UK), prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table here.

This document, the Audit Plan, outlines our audit strategy and plan to deliver the audit, while the Audit Findings will be issued prior to approval of the financial statements and will present key issues, findings and other matters arising from the audit, together with an explanation as to how these have been resolved.

We will communicate any adverse or unexpected findings affecting the audit on a timely basis, either informally or via an audit progress memorandum.

Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), 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.

13 Delivering audit quality

Delivering audit quality

Our quality strategy

We deliver the highest standards of audit quality by focusing our investment on:

Creating the right environment

Our audit practice is built around the markets it faces. Your audit team are focused on the Public Sector audit market and work with clients like you day in, day out. Their specialism brings experience, efficiency and quality.

Building our talent, technology and infrastructure

We've invested in digital tools and methodologies that bring insight and efficiency and invested in senior talent that works directly with clients to deploy bespoke digital audit solutions.

Working with premium clients

We work with great public sector clients that, like you, value audit, value the challenge a robust audit provides, and demonstrate the strongest levels of corporate governance. We're aligned with our clients on what right looks like.

Our objective is to be the best audit firm in the UK for the quality of our work and our client service, because we believe the two are intrinsically linked.

How our strategy differentiates our service

Our investment in a specialist team, and leading tools and methodologies to deliver their work, has set us apart from our competitors in the quality of what we do.

The FRC highlighted the following as areas of particularly good practice in its recent inspections of our work:

- use of specialists, including at planning phases, to enhance our fraud risk assessment
- effective deployment of data analytical tools, particularly in the audit of journals

The right people at the right time

We are clear that a focus on quality, effectiveness and efficiency is the foundation of great client service. By doing the right audit work, at the right time, with the right people, we maximise the value of your time and ours, while maintaining our second-to-none quality record.

Bringing you the right people means that we bring our specialists to the table early, resolving the key judgements before they impact the timeline of your financial reporting. The audit partner always retains the final call on the critical decisions; we use our experts when forming our opinions, but we don't hide behind them.

Digital differentiation

We're a digital-first audit practice, and our investment in data analytics solutions has given our clients better assurance by focusing our work on transactions that carry the most risk. With digital specialists working directly with your teams, we make the most of the data that powers your business when forming our audit strategy.

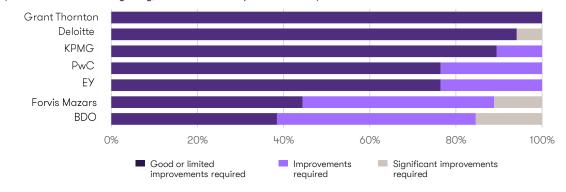
Oversight and control

Wherever your audit work is happening, we make sure that its quality meets your exacting requirements, and we emphasise communication to identify and resolve potential challenges early, wherever and however they arise. By getting matters on the table before they become "issues", we give our clients the time and space to deal with them effectively.

Quality underpins everything at Grant Thornton, as our FRC inspection results in the chart below attest to. We're growing our practice sustainably, and that means focusing where we know we can excel without compromising our strong track record or our ability to deliver great audits. It's why we will only commit to auditing clients where we're certain we have the time and resource, but, most importantly, capabilities and specialist expertise to deliver. You're in safe hands with the team; they bring the right blend of experience, energy and enthusiasm to work with you and are fully supported by myself and the rest of our firm.



FRC's Audit Quality Inspection and Supervision Inspection
(% of files awarded in each grading, in the most recent report for each firm)



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14 Appendices

Escalation Policy



The Backstop

The Department for Levelling Up, Housing and Communities have introduced an audit backstop date on a rolling basis to encourage timelier completion of local government audits.

As your statutory auditor, we understand the importance of appropriately resourcing audits with qualified staff to ensure high quality standards that meet regulatory expectations and national deadlines. It is the Authority's responsibility to produce true and fair accounts in accordance with the CIPFA Code by the statutory deadline and respond to audit information requests and queries in a timely manner.

Escalation Process

To help ensure that accounts audits can be completed on time in the future, we have introduced an escalation policy. This policy outlines the steps we will take to address any delays in draft accounts or responding to queries and information requests. If there are any delays, the following steps should be followed:

Step 1 - Initial Communication with Finance Director (within one working day of statutory deadline for draft accounts or agreed deadline for working papers)

• We will have a conversation with the Finance Director(s) to identify reasons for the delay and review the Authority's plans to address it. We will set clear expectations for improvement.

Step 2 - Further Reminder (within two weeks of deadline)

 If the initial conversation does not lead to improvement, we will send a reminder explaining outstanding queries and information requests, the deadline for responding, and the consequences of not responding by the deadline.

Step 3 - Escalation to Chief Executive (within one month of deadline)

• If the delay persists, we will escalate the issue to the Chief Executive, including a detailed summary of the situation, steps taken to address the delay, and agreed deadline for responding.

Step 4 - Escalation to the Audit Committee (at next available Audit Committee meeting or in writing to Audit Committee Chair within 6 weeks of deadline)

If senior management is unable to resolve the delay, we will
escalate the issue to the audit committee, including a detailed
summary of the situation, steps taken to address the delay, and
recommendations for next steps.

Step 5 – Consider use of wider powers (within two months of deadline)

 If the delay persists despite all efforts, we will consider using wider powers, e.g. issuing a statutory recommendation. This decision will be made only after all other options have been exhausted. We will consult with an internal risk panel to ensure appropriateness.

Aim

By following these steps, we aim to ensure that delays in responding to queries and information requests are addressed in a timely and effective manner, and that we are able to provide timely assurance to key stakeholders including the public on the Authority's financial statements.

IFRS reporters New or revised accounting standards that are in effect

First time adoption of IFRS 16
Lease liability in a sale and
leaseback

- IFRS 16 was implemented by LG bodies from 1 April 2024, with early adoption possible from 1 April 2022. The standard sets out the principles for the recognition, measurement, presentation and disclosure of leases and replaces IAS17. The objective is to ensure that lessees and lessors provide relevant information in a manner that faithfully represents those transactions. This information gives a basis for users of financial statements to assess the effect that leases have on the financial position, financial performance and cash flows of an entity.
- This year will be the first year IFRS 16 is adopted fully within Local Government.

IAS 1 amendments

Non-current liabilities with covenants

These amendments clarify how conditions with which an entity must comply within twelve months after the reporting period affect the classification of a liability. The amendments also aim to improve information an entity provides related to liabilities subject to these conditions.

Amendment to IAS 7 and IFRS 7 Supplier finance arrangements These amendments require disclosures to enhance the transparency of supplier finance arrangements and their effects on an entity's liabilities, cash flows and exposure to liquidity risk. The disclosure requirements are the IASB's response to investors' concerns that some companies' supplier finance arrangements are not sufficiently visible, hindering investors' analysis.

New or Revised IFRS

IFRS reporters future financial reporting changes

These changes will apply to local government once adopted by the Code of practice on local authority accounting (the Code).

Amendments to IAS 21 - Lack of exchangeability

IAS 21 has been amended by the IASB to specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. The amendments are expected to be adopted by the Code from **1 April 2025**.

Amendments to IFRS 9 and IFRS 7 – Classification and measurement of financial instruments

These amendments clarify the requirements for the timing of recognition and derecognition of some financial assets and liabilities, adds guidance on the SPPI criteria, and includes updated disclosures for certain instruments. The amendments are expected to be adopted by the Code **in future years**.

IFRS 19 Subsidiaries without Public Accountability: Disclosures

IFRS 19 provides reduced disclosure requirements for eligible subsidiaries. A subsidiary is eligible if it does not have public accountability and has an ultimate or intermediate parent that produces consolidated financial statements available for public use that comply with IFRS Accounting Standards. IFRS 19 is a voluntary standard for eligible subsidiaries and is expected to be adopted by the Code in future years.

IFRS 18 Presentation and Disclosure in the Financial Statements

IFRS 18 will replace IAS 1 Presentation of Financial Statements. All entities reporting under IFRS Accounting Standards will be impacted.

The new standard will impact the structure and presentation of the statement of profit or loss as well as introduce specific disclosure requirements. Some of the key changes are:

- Introducing new defined categories for the presentation of income and expenses in the income statement
- Introducing specified totals and subtotals, for example the mandatory inclusion of 'Operating profit or loss' subtotal.
- Disclosure of management defined performance measures
- Enhanced principles on aggregation and disaggregation which apply to the primary financial statements and notes.

IFRS 18 is expected to be adopted by the CIPFA Code in future years.

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The Grant Thornton Digital Audit – Inflo

A suite of tools utilised throughout the audit process



Collaborate

Information requests are uploaded by the engagement team and directed to the right member of your team, giving a clear place for files and comments to be uploaded and viewed by all parties.

What you'll see

- Individual requests for all information required during the audit
- Details regarding who is responsible, what the deadline is, and a description of what is required
- Graphs and charts to give a clear overview of the status of requests on the engagement





Ingest

The general ledger and trial balance are uploaded from the finance system directly into Inflo. This enables samples, analytical procedures, and advance data analytics techniques to be performed on the information directly from your accounting records.

What you'll see

- A step by step guide regarding what information to upload
- Tailored instructions to ensure the steps follow your finance system





Detect

Journals interrogation software which puts every transaction in the general ledger through a series of automated tests. From this, transactions are selected which display several potential unusual or higher risk characteristics.

What you'll see

- Journals samples selected based on the specific characteristics of your business
- A focussed approach to journals testing, seeking to only test and analyse transactions where there is the potential for risk or misstatement



