



To:

Ernst & Young
Grosvenor House,
Grosvenor Square
Southampton
SO15 2BE
United Kingdom

Date: 14 August 2023
Service: Finance
Tel: 01903 221221
Email: Sarah.gobey@adur-worthing.gov.uk

Worthing Borough Council – Audit for the year ended 31 March 2021

This letter of representations is provided in connection with your audit of the financial statements of Worthing Borough Council (“the Council”) for the year ended 31 March 2022. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the financial statements give a true and fair view of the Council financial position of Worthing Borough Council as of 31 March 2022 and of its income and expenditure for the year then ended in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).

We understand that the purpose of your audit of our financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing (UK), which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

A. Financial Statements and Financial Records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).
2. We acknowledge, as members of management of the Council, our responsibility for the fair presentation of the financial statements. We believe the financial statements referred to above give a true and fair view of the financial position, financial performance (or results of operations) and cash flows of the Council in accordance with [the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for

Future Codes for Infrastructure Assets (November 2022)), and are free from material misstatement, including omissions. We have approved the financial statements.

3. The significant accounting policies adopted in the preparation of the financial statements are appropriately described in the financial statements.
4. As members of management of the Council, we believe that the Council has a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22(as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)), that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic on our system of internal controls, and the effects of the conflict and related sanctions in Ukraine, Russia and/or Belarus on our system of internal controls.
5. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. We have not corrected any differences identified by and brought to the attention from the auditor as they represent immaterial differences in;
 - Property, Plant and Equipment valuations due to judgemental differences in opinion between the technical experts within EY and those commissioned by Council.
 - Investment Properties valuations due to judgemental differences in opinion between the technical experts within EY and those commissioned by Council.
6. We confirm the Council does not have securities (debt or equity) listed on a recognised exchange.

B. Non-compliance with law and regulations, including fraud

1. We acknowledge that we are responsible to determine that the Council's activities are conducted in accordance with laws and regulations and that we are responsible to identify and address any non-compliance with applicable laws and regulations, including fraud.
2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.
3. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
4. We have no knowledge of any identified or suspected non-compliance with law and regulations, including fraud, that may have affected the Council (regardless of the source or form and including, without limitation, allegations by "whistle blowers"), including non-compliance matters:

- involving financial improprieties;
- related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the Council's financial statements;
- related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Council's activities, its ability to continue to operate, or to avoid material penalties;
- involving management, or employees who have significant roles in internal controls, or others; or
- in relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

C. Information Provided and Completeness of Information and Transactions

1. We have provided you with:
 - Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
 - Additional information that you have requested from us for the purpose of the audit; and
 - Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
2. All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the financial statements, including those related to the COVID-19 pandemic and including those related to the conflict and related sanctions in Ukraine, Russia and/or Belarus.
3. We have made available to you all minutes of the meetings of the Council, Worthing Cabinet, Joint Audit and Governance and Joint Strategic Committees (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the period to the most recent meeting of Council on 18 July 2023.
4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Council's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the period ended, as well as related balances due to or from such parties at the period end. These transactions have been appropriately accounted for and disclosed in the financial statements.
5. We believe that the methods, significant assumptions and the data we used in making accounting estimates and related disclosures are appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).

6. We have disclosed to you, and the Council has complied with, all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.
7. From the beginning of the current period through the date of this letter we have disclosed to you, to the extent that we are aware, any (1) unauthorised access to our information technology systems that either occurred or to the best of our knowledge is reasonably likely to have occurred based on our investigation, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants) , to the extent that such unauthorised access to our information technology systems is reasonably likely to have a material impact to the financial statements, in each case or in the aggregate, and (2) ransomware attacks when we paid or are contemplating paying a ransom, regardless of the amount.

D. Liabilities and Contingencies

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the financial statements.
2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.
3. We have recorded and/or disclosed, as appropriate, all liabilities related litigation and claims, both actual and contingent, and have disclosed in the financial statements all guarantees that we have given to third parties.

E. Going Concern

1. Note 3 to the financial statements discloses all the matters of which we are aware that are relevant to the Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

F. Subsequent Events

1. There have been no events, including events related to the Covid-19 pandemic, and including events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus, subsequent to period end which require adjustment of or disclosure in the financial statements or notes thereto with the exception of the Triennial valuation of the pension fund which had the effect of changing the assets and liabilities associated with the fund.

G. Other Information

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the Narrative Report and Annual Governance Statement.

2. We confirm that the content contained within the other information is consistent with the financial statements.

H. Climate-related matters

1. We confirm that to the best of our knowledge all information that is relevant to the recognition, measurement, presentation and disclosure of climate-related matters has been considered and reflected in the financial statements.
2. The key assumptions used in preparing the financial statements are, to the extent allowable under the requirements of the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)), aligned with the communications we have made in the other information or other public communications made by us.

I. Ownership of Assets

1. Except for assets capitalised under finance leases, the Council has satisfactory title to all assets appearing in the Balance Sheet, and there are no liens or encumbrances on the Council's assets, nor has any asset been pledged as collateral. All assets to which the Council has satisfactory title appear in the Balance Sheet.
2. All agreements and options to buy back assets previously sold have been properly recorded and adequately disclosed in the financial statements.
3. We have no plans to abandon lines of product or other plans or intentions that will result in any excess or obsolete inventory, and no inventory is stated at an amount in excess of net realisable value.
4. There are no formal or informal compensating balance arrangements with any of our cash and investment accounts. We have no other line of credit arrangements.

J. Reserves

1. We have properly recorded or disclosed in the financial statements the useable and unusable reserves.

K. Contingent Liabilities

1. We are unaware of any violations or possible violations of laws or regulations the effects of which should be considered for disclosure in the financial statements or as the basis of recording a contingent loss (other than those disclosed or accrued in the financial statements).
2. We are unaware of any known or probable instances of non-compliance with the requirements of regulatory or government authorities, including their financial reporting requirements, and there have been no communications from regulatory agencies or government representatives concerning investigations or allegations of non-compliance, except as follows:

- Matters of routine, normal, recurring nature (e.g. examinations by bank and insurance examiners, examinations by taxing authorities) none of which involves any allegations of non-compliance with laws or regulations that should be considered for disclosure in the financial statements or as a basis for recording a loss contingency.

L. Use of the Work of a Specialist

1. We agree with the findings of the specialists that we engaged to evaluate the IAS 19 liability and valuation of land, buildings and investment properties and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialists.

M. Estimates

1. We confirm that the significant judgments made in making the estimate of the valuation of the IAS 19 pensions liability and the valuation of land, buildings and investment properties have taken into account all relevant information and the effects of the COVID-19 pandemic of which we are aware.
2. We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied or used in making the valuation of the IAS19 pension liability and the valuation of land and buildings and investment properties.
3. We confirm that the significant assumptions used in making the estimate of the valuation of the IAS 19 pensions liability and the valuation of land and buildings, investment properties appropriately reflect our intent and ability to carry out these valuations on behalf of the entity.
4. We confirm that the disclosures made in the financial statements with respect to the accounting estimates, including those describing estimation uncertainty and the effects of the COVID-19 pandemic, are complete and are reasonable in the context of CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).
5. We confirm that appropriate specialised skills or expertise has been applied in making the estimate of the valuation of the IAS19 pensions liability and the valuation of land and buildings, investment properties.
6. We confirm that no adjustments are required to the accounting estimates and disclosures in the financial statements, including due to the COVID-19 pandemic.

N. Retirement benefits

1. On the basis of the process established by us and having made appropriate enquiries, we are satisfied that the actuarial assumptions underlying the scheme liabilities are consistent with our knowledge of the business. All significant retirement benefits and all settlements and curtailments have been identified and properly accounted for.

Yours faithfully,

Signed:



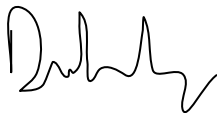
Name: Sarah Gobey

Position: Chief Financial Officer

Date: 14th August 2023

Signed on behalf of Worthing Borough Council

I confirm that this letter has been discussed and agreed by the Joint Governance Committee.



Name: Councillor Dan Hermitage

Position: Chairman, Joint Governance Committee

Date: 13th August 2023

Communication schedule for uncorrected misstatements

Entity: Worthing Borough Council

Period Ended: 31-Mar-2022

Currency: £

| Uncorrected misstatements | | Analysis of misstatements Debit/(Credit) | | | | | | | | | Income statement effect of the prior period | |
|---|----------|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------|----------------------------------|---|-------------|---|-------------|
| No. | W/P ref. | Account (Note 1) | Assets Current | Assets Non-current | Liabilities Current | Liabilities Non-current | Equity components | Effect on the current period OCI | Income statement effect of the current period | | Prior period Debit/(Credit) | Non taxable |
| | | (misstatements are recorded as journal entries with a description) | Debit/(Credit) (Note 2) | Debit/(Credit) (Note 2) | Debit/(Credit) (Note 2) | Debit/(Credit) (Note 2) | Debit/(Credit) | Debit/(Credit) | Debit/(Credit) | Non taxable | | |
| Judgmental misstatements: | | | | | | | | | | | | |
| | 22 WBC | Investment Properties Overstated because incorrect yield used by the valuer not supported by EYRE - Interface House, Interface Park, Royal Wootton Bassett, Wiltshire | | | | | | | | | | |
| | | Dr Revaluation Reserves | | | | | 374,000 | | | | | |
| | | Cr Investment Properties | | (374,000) | | | | | | | | |
| | 22 WBC | Connaught Theatre property is overstated by £121k because 25% external cost was added by the Valuer. | | | | | | | | | | |
| | | Dr Revaluation Reserves | | | | | 121,348 | | | | | |
| | | Cr Property, Plant and Equipment | | (121,348) | | | | | | | | |
| | 22 WBC | We have noted a judgmental aggregate understatement of £654,083.84 when we compare the GE to the management Specialist (WHE)'s fair value movement | | | | | | | | | | |
| | | Dr Property, Plant and Equipment | | 654,084 | | | | | | | | |
| | | Cr Revaluation Reserves | | | | | (654,084) | | | | | |
| | 22 WBC | We have noted a judgmental aggregate understatement of £654,083.84 when we compare the GE to the management Specialist (WHE)'s fair value movement | | | | | | | | | | |
| | | Dr Investment Properties | | 433,351 | | | | | | | | |
| | | Cr Revaluation Reserves | | | | | (433,351) | | | | | |
| Projected misstatements: | | | | | | | | | | | | |
| Total of uncorrected misstatements before income tax | | | 0 | 592,087 | 0 | 0 | (592,087) | 0 | 0 | | | |
| Total of uncorrected misstatements | | | 0 | 592,087 | 0 | 0 | (592,087) | 0 | 0 | | | |
| Financial statement amounts | | | | | | | | | | | | |
| Effect of uncorrected misstatements on F/S amounts | | | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% | | 0.0% | | | |
| Memo: Total of non-taxable items (marked 'X' above) | | | | | | | | | | | | |
| Uncorrected misstatements before income tax | | | | | | | 0.0% | 0 | | | | |
| Less: Tax effect of misstatements at current year marginal rate | | | | | | | | 0 | | | | |
| Uncorrected misstatements in income tax | | | | | | | | 0 | | | | |
| Cumulative effect of uncorrected misstatements after tax but before turnaround | | | | | | | 0.0% | 0 | | | | |
| Turnaround effect of prior period uncorrected misstatements | | | | | | | | | | | | |
| All factual and projected misstatements: | | | | | | | | 0 | | | | |
| Judgmental misstatements (Note 3): | | | | | | | | 0 | | | | |
| Cumulative effect of uncorrected misstatements, after turnaround effect | | | | | | | 0.0% | 0 | | | | |
| Current year income before tax | | | | | | | | | | | | |
| Current year income after tax | | | | | | | | | | | | |