



Buckinghamshire & Milton Keynes Fire Authority

Meeting and date: Overview and Audit Committee, 8 November 2023

Report title: Letter of Management Representation 2021/22

Lead Member: Councillor Matthew Walsh

Report sponsor: Mark Hemming, Director of Finance & Assets

Author and contact: Marcus Hussey mhussey@bucksfire.gov.uk

Action: Decision.

Recommendations: That the Letter of Representation be approved for signature by the Chief Finance Officer and the Chairman of the Overview and Audit Committee.

Executive summary:

The Authority is required to consider and sign the letter of representation to Ernst & Young in order for the audit opinion and conclusion to be issued.

Financial implications:

No direct impact.

Risk management:

No direct impact.

Legal implications:

The audit of the financial statements is a statutory requirement.

Privacy and security implications:

No direct impact.

Duty to collaborate:

No direct impact.

Health and safety implications:

No direct impact.

Environmental implications:

No direct impact.

Equality, diversity, and inclusion implications:

No direct impact.

Consultation and communication:

No direct impact.

Background papers:

None

Appendix	Title	Protective Marking
1	Letter of Management Representation 2021/22	
2	Schedule of uncorrected misstatements 2021/22	



Andrew Brittain
Ernst & Young LLP
R+ Building
2 Blagrove Street
Reading
Berkshire
RG1 1AZ

Our ref: Letter of Representation 2021/22
Enquiries to: Mark Hemming
Direct line: 01296 744687
Date: 08 November 2023
Email: mhemming@bucksfire.gov.uk

Dear Andrew,

Buckinghamshire & Milton Keynes Fire and Rescue Authority - Audit for the year ended 31 March 2022

This letter of representations is provided in connection with your audits of the financial statements of Buckinghamshire and Milton Keynes Fire Authority ("the Authority") for the years ended 31 March 2021 and 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 present fairly, in all material respects (or 'give a true and fair view of') the financial position of Buckinghamshire and Milton Keynes Fire Authority as of 31 March 2021 and 31 March 2022 and of its income and expenditure and its cash flows for each of the two years in the period ended 31 March 2022 in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.

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.
2. We acknowledge, as members of management of the Authority, 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 Authority in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22, and are free of material misstatements, 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.



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4. As members of management of the Authority, we believe that the Authority 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, 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.
 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 the projected and factual misstatements identified by and brought to the attention by the auditor relating to land valuations. This is due to a judgmental difference and matter of professional opinion between the independent property valuers and auditors. Overall, the differences identified equate to -£255,972 on non-current assets and £256,457 on other comprehensive income, resulting in a net difference on cost of services of -£485, which is immaterial to the accounts. In addition, auditors identified projected prior period misstatements during testing of creditors equating to £347 understatement in creditors. Auditors extrapolated this figure across the whole of creditors to a figure of £51,536. The cumulative effect of uncorrected misstatements, in the net cost of services, after turnaround effect was £51,051.

We confirm the Authority 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 Authority'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. Save from that notified to the auditors in July 2022 that some staff appear not to have been in receipt of correct remuneration for annual leave, dating back over previous financial years (some cases based on contractual entitlement; others based on the interpretation of statutory entitlement), we have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Authority (regardless of the source or form and including without limitation, any allegations by "whistleblowers"), 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 Authority'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 Authority's activities, its ability to continue to

Director of Finance & Assets: Mark Hemming FCPFA

Buckinghamshire Fire & Rescue Service
Brigade Headquarters, Stocklake, Aylesbury, Bucks HP20 1BD
Tel: 01296 744400 Fax: 01296 744419



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 noncompliance 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 events 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 Authority, the Executive Committee and the Overview and Audit Committee held through the year to the most recent meeting on the following date: 15 March 2023.

4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Authority'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 31 March 2022 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 the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.

6. We have disclosed to you, and the Authority has complied with, all aspects of contractual agreements that could have a material effect on the financial statements in the event of noncompliance, including all covenants, conditions or other requirements of all outstanding debt.



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7. From 21 March 2022 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 to litigation and claims, both actual and contingent.

E. Going Concern

1. The Statement of Accounting Policies in the financial statements discloses all the matters of which we are aware that are relevant to the Authority'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.

G. Other information

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the narrative statement.
2. We confirm that the content contained within the other information is consistent with the financial statements.

H. Comparative Information

In connection with your audit of the comparative financial statements for the year ended 31 March 2021 we represent, to the best of our knowledge and belief, the following:

During the audit it was identified n error in how the historic revaluation reserve values and the current revaluation reserve values were being calculated within the fixed asset register. This has resulted in several presentational errors within the financial statements, however does not



impact the closing balances for the Movement in Reserves Statement (MIRS), Comprehensive Income and Expenditure Statement (CIES), Balance Sheet and Note 11 Non-Current Assets for 2021/22.

In addition, it was note 11 it was identified that the disclosure of both the cost and the accumulated depreciation was overstated in both the current year and the prior year. Under the CIPFA Code all accumulated depreciation should be written out on revaluation. The adjustment to the accounts results in a prior period adjustment and an adjustment to the current year draft accounts to reset the accumulated depreciation balance. There is no impact on the net book value of the property, plant and equipment for 20/21.

The comparative amounts have been correctly restated to reflect the above matter(s) and appropriate note disclosure of this (these) restatement(s) has (have) also been included in the current year's financial statements.

I. Ownership of Assets

1. Except for assets capitalised under finance leases, the Authority] has satisfactory title to all assets appearing in the balance sheet(s), and there are no liens or encumbrances on the Authority's assets, nor has any asset been pledged as collateral. All assets to which the Authority has satisfactory title appear in the balance sheet(s).
2. All agreements and options to buy back assets previously sold have been properly recorded and adequately disclosed in the financial statements.
3. There are no formal or informal compensating balance arrangements with any of our cash and investment accounts.

J. Reserves

1. We have properly recorded or disclosed in the Authority 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 governmental 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 for those matters of routine, normal, recurring nature none of which involves any allegations of noncompliance 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

We agree with the findings of the specialists that we engaged to evaluate the valuation of property, plant and equipment and the IAS19 actuarial valuations of pension liabilities 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. Pension Liability and PPE Estimates

1. We confirm that the significant judgments made in making the valuation of the pension liability and the valuation of property plant and equipment 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 pension liability and the valuation of property plant.
3. We confirm that the significant assumptions used in making the valuation of the pension liability and the valuation of property plant appropriately reflect our intent and ability to carry out valuations on behalf of the entity.
4. We confirm that the disclosures made in the financial statements with respect to the accounting estimate(s), 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.
5. We confirm that appropriate specialised skills or expertise has been applied in making the valuation of the pension liability and the valuation of property plant and equipment.
6. We confirm that no adjustments are required to the accounting estimate(s) 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,

_____ Mark Hemming
Director of Finance and Chief Financial Officer

_____ Cllr David Carroll
Chairman of the Overview and Audit Committee

Communication schedule for uncorrected misstatements

Entity: Buckinghamshire Milton Keynes & Fire Authority

Period Ended: 31-Mar-2022

Currency: GBP

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		
Projected misstatements:												
Payables		Our creditor testing identified an error of creditors being overstated, and expenditure understated by £347 in our rep sample, which when extrapolated across- error turned around in current year.									(51,536)	
22	BMKFA	Projected error in Land valuation testing										
		Revaluation Loss								80,836		
		PPE		(80,836)								
Factual misstatements:												
22	BMKFA	Error in Land valuation testing (out of EYRE range)										
		Revaluation Loss								(81,321)		
		PPE		(175,136)								
		Revaluation Reserve					256,457					
Total of uncorrected misstatements before income tax			0	(255,972)	0	0	256,457	0	(485)		(51,536)	
Total of uncorrected misstatements			0	(255,972)	0	0	256,457	0	(485)		(51,536)	
Financial statement amounts			21,784,000	46,178,000	(6,753,000)	(355,114,000)	293,905,000					
Effect of uncorrected misstatements on F/S amounts			0.0%	-0.6%	0.0%	0.0%	0.1%		0.0%		0.0%	
Memo: Total of non-taxable items (marked 'X' above)										0		0
Uncorrected misstatements before income tax								0.0%	(485)		(51,536)	
Less: Tax effect of misstatements at current year marginal rate									0		0	
Uncorrected misstatements in income tax									0		0	
Cumulative effect of uncorrected misstatements after tax but before turnaround								0.0%	(485)		(51,536)	
Turnaround effect of prior period uncorrected misstatements												
All factual and projected misstatements:										51,536	51,536	
Judgmental misstatements (Note 3):										0	0	

Communication schedule for uncorrected misstatements

Entity: **Buckinghamshire Milton Keynes & Fire Authority**

Period Ended: **31-Mar-2022**

Currency: **GBP**

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		
								0.0%	51,051			
Cumulative effect of uncorrected misstatements, after turnaround effect												
Current year income before tax												
Current year income after tax												