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PricewaterhouseCoopers LLP
10 Bricket Road
St Albans
Hertfordshire

AL1 3JX

Dear Sirs

Representation letter – audit of Huntingdonshire District Council's (the Authority's) Statement of Accounts for the year ended 31 March 2015

Your audit is conducted for the purpose of expressing an opinion as to whether the Statement of Accounts of the Authority give a true and fair view of the affairs of the Authority as at 31 March 2015 and of its deficit and cash flows for the year then ended and have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15 supported by the Service Reporting Code of Practice 2014/15.

I acknowledge my responsibilities as Responsible Financial Officer for preparing the Statement of Accounts as set out in the Statement of Responsibilities for the Statement of Accounts. I also acknowledge my responsibility for the administration of the financial affairs of the authority and that I am responsible for making accurate representations to you.

I confirm that the following representations are made on the basis of enquiries of other chief officers and members of the Authority with relevant knowledge and experience and, where appropriate, of inspection of supporting documentation sufficient to satisfy myself that I can properly make each of the following representations to you.

I confirm, to the best of my knowledge and belief, and having made the appropriate enquiries, the following representations:

Statement of Accounts

- I have fulfilled my responsibilities for the preparation of the Statement of Accounts in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15
- supported by the Service Reporting Code of Practice 2014/15; in particular the Statement of Accounts give a true and fair view in accordance therewith.
- All transactions have been recorded in the accounting records and are reflected in the Statement of Accounts.

- Significant assumptions used by the Authority in making accounting estimates, including those surrounding measurement at fair value, are reasonable.
- All events subsequent to the date of the Statement of Accounts for which the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15 requires adjustment or disclosure have been adjusted or disclosed.
- The effects of uncorrected misstatements are immaterial, both individually and in the aggregate, to the Statement of Accounts as a whole. A list of the uncorrected misstatements, grouped by category, is attached to this letter in **Appendix 1**.

Information Provided

- I have taken all the steps that I ought to have taken in order to make myself aware of any relevant audit information and to establish that you, the authority's auditors, are aware of that information.
- I have provided you with:
 - access to all information of which I am aware that is relevant to the preparation of the Statement of Accounts such as records, documentation and other matters, including minutes of the Authority and its committees, and relevant management meetings;
 - additional information that you have requested from us for the purpose of the audit;
 and
 - unrestricted access to persons within the Authority from whom you determined it necessary to obtain audit evidence.
- So far as I am aware, there is no relevant audit information of which you are unaware.

Accounting policies

I confirm that I have reviewed the Authority's accounting policies and estimation techniques and, having regard to the possible alternative policies and techniques, the accounting policies and estimation techniques selected for use in the preparation of Statement of Accounts are appropriate to give a true and fair view for the authority's particular circumstances.

Fraud and non-compliance with laws and regulations

I acknowledge responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.

I have disclosed to you:

- the results of our assessment of the risk that the Statement of Accounts may be materially misstated as a result of fraud.
- all information in relation to fraud or suspected fraud that we are aware of and that affects the Authority and involves:
 - management;
 - o employees who have significant roles in internal control; or

- others where the fraud could have a material effect on the Statement of Accounts.
- all information in relation to allegations of fraud, or suspected fraud, affecting the Authority's Statement of Accounts communicated by employees, former employees, analysts, regulators or others.
- all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing the Statement of Accounts.

I am not aware of any instances of actual or potential breaches of or non-compliance with laws and regulations which provide a legal framework within which the Authority conducts its business and which are central to the authority's ability to conduct its business or that could have a material effect on the Statement of Accounts.

I am not aware of any irregularities, or allegations of irregularities including fraud, involving members, management or employees who have a significant role in the accounting and internal control systems, or that could have a material effect on the Statement of Accounts.

Related party transactions

I confirm that the attached **Appendix 2** to this letter is a complete list of the Authority's related parties. All transfer of resources, services or obligations between the Authority and these parties have been disclosed to you, regardless of whether a price is charged. We are unaware of any other related parties, or transactions between disclosed related parties.

Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of Section 3.9 of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.

We confirm that we have identified to you all senior officers, as defined by the Accounts and Audit Regulations 2011, and included their remuneration in the disclosures of senior officer remuneration.

Employee Benefits

I confirm that we have made you aware of all employee benefit schemes in which employees of the authority participate.

Contractual arrangements/agreements

All contractual arrangements (including side-letters to agreements) entered into by the Authority have been properly reflected in the accounting records or, where material (or potentially material) to the statement of accounts, have been disclosed to you.

Litigation and claims

I have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the statement of accounts and such matters have been appropriately accounted for and disclosed in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.

Taxation

I have complied with UK taxation requirements and have brought to account all liabilities for taxation due to the relevant tax authorities whether in respect of any direct tax or any indirect taxes. I am not aware of any non-compliance that would give rise to additional liabilities by way of penalty or interest and I have made full disclosure regarding any Revenue Authority queries or investigations that we are aware of or that are ongoing.

In particular:

- In connection with any tax accounting requirements, I am satisfied that our systems are
 capable of identifying all material tax liabilities and transactions subject to tax and have
 maintained all documents and records required to be kept by the relevant tax authorities
 in accordance with UK law or in accordance with any agreement reached with such
 authorities.
- I have submitted all returns and made all payments that were required to be made (within the relevant time limits) to the relevant tax authorities including any return requiring us to disclose any tax planning transactions that have been undertaken for the authority's benefit or any other party's benefit.
- I am not aware of any taxation, penalties or interest that are yet to be assessed relating
 to either the authority or any associated company for whose taxation liabilities the
 authority may be responsible.

Bank accounts

I confirm that I have disclosed all bank accounts to you including those that are maintained in respect of the Authority.

Subsequent events

There have been no circumstances or events subsequent to the period end which require adjustment of or disclosure in the statement of accounts or in the notes thereto.

Assets and liabilities

- The Authority has no plans or intentions that may materially alter the carrying value and where relevant the fair value measurements or classification of assets and liabilities reflected in the Statement of Accounts.
- In my opinion, on realisation in the ordinary course of the business the current assets in the balance sheet are expected to produce no less than the net book amounts at which they are stated.
- The Authority has no 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.
- The Authority has satisfactory title to all assets and there are no liens or encumbrances on the Authority's assets, except for those that are disclosed in the Statement of Accounts.

I confirm that we have carried out impairment reviews appropriately, including an
assessment of when such reviews are required, where they are not mandatory. I
confirm that we have used the appropriate assumptions with those reviews.

Financial Instruments

- Details of all financial instruments, including derivatives, entered into during the year have been made available to you. Any such instruments open at the year-end have been properly valued and that valuation incorporated into the statement of accounts. When appropriate, open positions in off-balance sheet financial instruments have also been properly disclosed in the Statement of Accounts.
- All embedded derivatives have been identified and appropriately accounted for under the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2014/15.
- Where hedging relationships have been designated as either firm commitments or highly
 probable forecast transactions, I confirm that our plans and intentions are such that these
 relationships qualify as genuine hedge arrangements.
- Where fair values have been assigned to financial instruments, I confirm that the valuation techniques, the inputs to those techniques and assumptions that have been made are appropriate and reflect market conditions at the balance sheet date, and are in line with the business environment in which we operate.

Retirement benefits

- All retirement benefits that the Authority is committed to providing, including any
 arrangements that are statutory, contractual or implicit in the authority's actions, wherever
 they arise, whether funded or unfunded, approved or unapproved, have been identified and
 properly accounted for and/or disclosed.
- All settlements and curtailments in respect of retirement benefit schemes have been identified and properly accounted for.
- The following actuarial assumptions underlying the valuation of retirement benefit scheme liabilities are consistent with my knowledge of the business and in my view would lead to the best estimate of the future cash flows that will arise under the scheme liabilities:
 - Rate of Increase in Salaries 4.3%
 - o Rate of Increase of Pensions 2.4%
 - Rate of discounting scheme liabilities 3.2%

Longevity at 65 for current pensioners

- o Men 22.5
- Women 24.5

Longevity at 65 for future pensioners

- o Men 24.4
- Women 26.9

Using the work of experts

I agree with the findings of Baker Storey Matthews (BSM), experts in evaluating the valuation of property and have adequately considered the competence and capabilities of the experts in determining the amounts and disclosures used in the preparation of the Statement of Accounts and underlying accounting records. The Authority did not give or cause any instructions to be given to experts with respect to the values or amounts derived in an attempt to bias their work, and I am not otherwise aware of any matters that have had an impact on the objectivity of the experts. In particular we concur with BSM's assessment that there has been no material increase in the value of fixed assets not formally revalued in 2014/15.

I also agree with work performed by Inform CPI – Analyse Local over the Non Domestic Rates appeals provision and have adequately considered the competence and capabilities of the experts in determining the amounts and disclosures used in the preparation of the Statement of Accounts and underlying accounting records. The Authority did not give or cause any instructions to be given to experts with respect to the values or amounts derived in an attempt to bias their work, and I am not otherwise aware of any matters that have had an impact on the objectivity of the experts. The figure stated in the Statement of Accounts and in the Collection Fund is a best estimate on the work performed by Inform CPI – Analyse Local.

National Domestic Rate appeals provision

[10 be draited when final position determined].
Clive Mason CPFA
Responsible Financial Officer – Head of Resources
For and on behalf of Huntingdonshire District Council
Date

Summary of Uncorrected Misstatements

Appendix 1

We found the following misstatements during the audit that have not been adjusted by management. You are requested to consider these formally and determine whether you would wish the accounts to be amended. If the misstatements are not adjusted we will need a written representation from you explaining your reasons for not making the adjustments. Our reporting level was set at £85,300.

We have not identified any uncorrected financial misstatements at the time of writing.

No	Descript misstate judgeme projecte	ement (factual, ental,	Income st	atement	Balance sheet
Dr	Cr		Dr		Cr
1		Dr xxx Cr xxx Being an adjustn	nent to	F	
2		Dr xxx Cr xxx Being an adjustm	nent to	J	
3		Dr xxx Cr xxx Being an adjustm	nent to	P	
Total uncorrected misstatements	ł	x		x	X

Related Party and Related Party Transactions

Appendix 2

Name	Relationship to HDC	Declared related party transaction
Ablewhite, Jason	Member	
Akthar, Sid	Member	
Baker, Keith	Member	
Baker, Mike	Member	£37,000 (Community Grant for voluntary organisations)
Bates, Ian	Member	
Boddington, Barbara	Member	
Bucknell, Peter	Member	
Bull,Graham	Member	
Butler, Eric	Member	
Cambs City Council	Shared Services	
Cambs County Council	Shared Services	
Carter, Robin	Member	
Cawley, Stephen	Member	
Chapman, Barry	Member	
Churchill, Ken	Member	
Conboy, Sarah	Member	
Criswell, Steve	Member	
Curtis, Angela	Member	
Curtis, Ian	Member	
Davies, John	Member	
Dew, Douglas	Member	
Dickinson, Angela	Member	
Duffy, Lisa	Member	
Farrer, Bob	Member	

Name	Relationship to HDC	Declared related party transaction
Francis, Mike	Member	
Fuller, Ryan	Member	
Gardener, Ian	Member	
Giles, Derek	Member	
Gray, Jonathan	Member	
Hansard Andrew	Member	
Hardy, Andrew	Member	
Harlock, Greg	Member	
Harrison, Roger	Member	
Harty, David	Member	
Hayward, Terry	Member	
Howe, Robin	Member	
Hyland, Barry	Member	
Ingram, Steve	Chief Officer	
Jordan, Patricia	Member	
Kadewere, Patrick	Member	
Kadic, Laine	Member	
Lancaster, Joanne	Chief Officer	
Longford, Paula	Member	
MacKender-Lawrence, Alan	Member	
Mason, Clive	Chief Officer	
Mathews, Rita	Member	
McCurdy Nigel	Chief Officer	
Mitchell, Peter	Member	
Morris, John	Member	£199,652 (Crash bed for homelessness)
Oliver, Mark	Member	
Reeve, Peter	Member	

Name	Relationship to HDC	Declared related party transaction
Reynolds, Deborah	Member	
Sanderson, Tom	Member	
Shellens, Mike	Member	
Slatter, Julie	Chief Officer	
South Cambs District Coucil	Shared Services	
Tuplin, Dick	Member	
Tysoe, Darren	Member	
Ursell, Paul	Member	
VanDeKerkhove, Steve	Member	
West, Richard	Member	