

# **Audit Strategy**

**Causeway Coast and Glens Borough Council**  
2024-25

**Date**

06 March 2025

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*We have prepared this report for Causeway Coast and Glens Borough Council's sole use. You must not disclose it to any third party, quote or refer to it, without our written consent and we assume no responsibility to any other person.*

# 1. Key Messages

## Background

The Local Government Auditor is the independent external auditor of Causeway Coast and Glens Borough Council's ("the Council") Statement of Accounts under the Local Government (Northern Ireland) Order 2005. In addition to the audit of the financial statements, the Local Government Auditor has a statutory duty to be satisfied the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of its resources.

The Local Government Auditor (LGA) is also required to conduct an improvement audit and assessment each year under Part 12 of the Local Government Act (Northern Ireland) 2014 (the Act) and the statutory '*Guidance for Local Government Performance Improvement 2016*', (the Guidance).

## Purpose

The purpose of this document is to highlight to the Chief Financial Officer and Audit Committee of Causeway Coast and Glens Borough Council:

- how we, on behalf of the Local Government Auditor (LGA), [plan to audit](#) the financial statements for the year ending 31 March 2025, including how we will be addressing [significant risks](#) of material misstatement to transactions and balances;
- how we, on behalf of the LGA, plan to audit the [proper arrangements](#) in place for securing economy, efficiency and effectiveness in the use of resources for the year ending 31 March 2025;
- how we, on behalf of the LGA, plan to conduct an improvement audit and assessment;
- the planned [timetable, fees and audit team](#);
- relevant updates to the code;
- matters which we are required to communicate to you under International Standards on Auditing (ISAs), including the [scope of the audit](#), our [respective responsibilities](#), and [how we maintain independence and objectivity](#); and
- [Public Reporting](#) work undertaken by the LGA that is relevant to Causeway Coast and Glens Borough Council.

## Materiality

When setting materiality, we consider both qualitative and quantitative aspects that would reasonably influence the decisions of users of the financial statements. [The overall account materiality](#) is £1.7million.

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## Significant Audit Risks

We plan our audit of the financial statements to respond to the risks of material misstatement to transactions and balances. We have identified the following [risks](#) for the Council which have the most significant impact on our audit approach:

- Management override of controls
  - Procurement
  - Management of Council's Land and Buildings
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## Proper Arrangements

We will issue a questionnaire on proper arrangements to the Council. We will review the Council's responses and perform additional work in areas considered to be higher risk. The main financial audit work will also feed into the risk assessment and conclusions of arrangements in place.

Conclusions regarding proper arrangements will be noted in the Report to those charged with Governance including any recommendations for improvement.

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## Performance Improvement

The LGA will undertake a full assessment of whether the Council is likely to comply with its performance improvement responsibilities under the Act in 2024. In preparation for this, the Council should ensure that:

- it has established adequate performance improvement arrangements;
  - it has substantive evidence to demonstrate improvement; and
  - it has addressed any outstanding Proposals for Improvement made by the LGA in previous years.
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## **Audit Team and Fee**

Patrick Barr will be responsible for the overall audit. The full engagement team is presented in [Section 4](#).

Our estimated audit [fee](#) for this year is £79,800 for the financial audit and £25,000 for the performance improvement audit and assessment.

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## **Actions for the Audit Committee**

The Audit Committee should discuss:

- whether our assessment of the risks of material misstatement to the financial statements is complete;
- whether management has plans in place to address the risks identified by NIAO and whether these plans are adequate;
- our proposed audit response to address these risks; and
- whether they have knowledge of any
  - actual, suspected or alleged fraud affecting Causeway Coast and Glens Borough Council; or
  - instances of non-compliance with laws and regulations that could be expected to have a fundamental effect on the operations of Causeway Coast and Glens Borough Council.

## 2. Materiality

<b>BASIS FOR OVERALL MATERIALITY CALCULATION</b>	<b>OVERALL ACCOUNT MATERIALITY (2%)</b>	<b>ERROR REPORTING THRESHOLD</b>
£83,178,000 [2023-24 Gross Expenditure]	£1.7million	We report to you all misstatements, whether adjusted or unadjusted, above £66,000

A matter is material if its omission or misstatement would reasonably influence the decisions of the users of the financial statements. The assessment of what is material is a matter of the auditor's professional judgement and includes consideration of both the amount and the nature of misstatement.

The concept of materiality recognises that absolute accuracy in financial statements is rarely possible. An audit is therefore designed to provide reasonable, rather than absolute, assurance that the financial statements are free from material misstatement. We apply this concept in planning and performing our audit, in evaluating the effect of identified misstatements on our audit and of uncorrected misstatements, if any, on the financial statements when forming the audit opinion. This includes the statistical evaluation of errors found in samples which are individually below the materiality threshold but which, when extrapolated, suggest material error in an overall population. As the audit progresses our assessment of both quantitative and qualitative materiality may change.

In areas where users are particularly sensitive to inaccuracy or omission, we may treat misstatements as material even below the principal threshold. These areas include:

- the remuneration and staff report;
- movement on reserves;
- our audit fee;
- prior year figures; and
- specific legal settlements or amounts which should be agreed to other accounts.

## **3. Audit Approach**

### **Audit Approach**

The NIAO audit approach is risk-based, informed by a good understanding of the operations of Causeway Coast and Glens Borough Council and the performance of extensive risk assessment procedures to identify risks of material misstatement associated with the financial statements and the use of IT in financial reporting. For each risk of material misstatement identified, we will design responsive audit approaches at the financial statement and audit assertion levels as appropriate using a variety of audit techniques. These will include using the work of experts, testing how management has made accounting estimates, analytical procedures and sampling of transactions. We will review management controls, including IT controls, operated by the Council only to the extent we consider necessary for the effective performance of the audit.

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### **Independence**

We are independent of Causeway Coast and Glens Borough Council in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard. We have fulfilled our ethical responsibilities in accordance with these requirements and have developed important safeguards and procedures in order to ensure our independence and objectivity.

NIAO quality standards and independence can be found [on our website](#).

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### **Management of Personal Data**

During the course of our audit we have access to personal data to support our audit testing. The NIAO has appointed a Data Protection Officer and has implemented a Data Protection Policy which ensures that personal data (and other sensitive data) used in connection with the audit is requested, transferred, controlled, processed and destroyed in accordance with the General Data Protection Regulation and applicable national law.

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## **Using the work of Internal Audit**

We liaise closely with internal audit throughout the audit process and seek to take assurance from their work where their objectives cover areas of joint interest. We do not plan to place any reliance on Internal Audit.

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## **Using Specialised Skills**

We will rely on the work of the following:

- Land and Property Services (LPS) in respect of the valuation of the land and buildings; and
  - The actuary in respect of the pension valuation.
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## **Changes to the Code of Practice in 2024-25**

A substantial and significant accounting change in the full adoption of IFRS 16. The sections impacted are set out on page ix of the code. Other key accounting changes in the 2024-25 edition of the Code include:

- Amendments to Section 4.2 reflecting recent amendments on the treatment of sale and leaseback arrangements.
  - Amendments to Section 4.3 reflecting changes to the treatment on initial application of IFRS 16 to service concession arrangements which provide for variable payments that depend on an index or rate.
  - Confirmation in Appendix C (Changes in Accounting Policies: Disclosures in the 2023/24 and 2024/25 Financial Statements) of the transitional reporting requirements of the new standards introduced in the 2024/25 Code, while also having regard to requirements in relation to voluntary adoption of IFRS 16.
  - Confirmation in Appendix D (New or Amended Standards Introduced to the 2024/25 Code) of the new standards introduced to the 2024/25 Code.
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## **Audit Scope**

The scope of our audit and respective responsibilities can be found [on our website](#).

The Code of Audit Practice issued by the Local Government Auditor extends to not only the audit of financial statements but also to aspects of financial and corporate arrangements to secure the economic, efficient and effective use of resources. The Code can also be viewed on the NIAO website at [Code of Audit Practice \(Local Government\)](#).

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## **Respective Responsibilities in the preparation of the financial statements**

In line with Auditing Standards we are required to agree the respective responsibilities of the Local Government Auditor, the Council's Chief Financial Officer and the NIAO. These responsibilities are set out in the Statement of Responsibilities of Local Government Auditors and Local Government Bodies issued by the Local Government Auditor. The Statement of Responsibilities can be viewed on the NIAO website at [Statement of responsibilities of Local Government Auditor and Local Government Bodies](#).

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.

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## **Proper Arrangements in place to secure economy, efficiency and effectiveness**

Under the Code of Audit Practice we are also required to perform an initial assessment of significant risks to the conclusion on proper arrangements in place to secure economy efficiency and effectiveness in the use of its resources.

We will issue a Proper Arrangements Questionnaire to the Council. We will review the Council's responses and the documentary evidence provided in support of the responses. We will follow-up on recommendations for improvement identified in previous years.

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## Performance Improvement

The Local Government (Northern Ireland) Act 2014 prescribes responsibilities for the Local Government Auditor regarding the audit and assessment of performance improvement arrangements in Councils. This work will be conducted in accordance with the Act, the Guidance, the Local Government Code of Audit Practice 2016 and the LGA's Statement of Responsibilities, and includes:

- an improvement audit for the purposes of determining:
  - whether the Council has, during the year, discharged its duties under section 92 of the Act; and
  - the extent to which the Council has, during the year, acted in accordance with any guidance issued by the Department about any Council duties under section 92;
- an improvement assessment for the purpose of determining whether the Council is likely, during the year, to comply with the requirements of Part 12 of the Act;
- issuing a report, or reports, in respect of the Council to the Council and the Department, under section 95 of the Act; and
- producing and publishing an annual improvement report under section 97 of the Act.

The Act also allows the LGA to:

- carry out an assessment for the purpose of determining whether the Council is likely to comply with the requirements of Part 12 of the Act in subsequent financial years; and
- carry out a special inspection of the Council's compliance with the requirements of Part 12 if the LGA is of the opinion that the Council may fail to comply with the requirements of Part 12 of the Act.

The audit team will request access to all relevant documents and Council officers. Sharing our 'audit work programme' in advance of the audit will assist the Council in preparing for the audit fieldwork. We suggest the Council prepares a file of audit evidence in advance of the fieldwork stage, cross referenced to specific paragraphs or sections of the documents providing the necessary evidence. This should help us deliver a more efficient audit.

## **Significant Audit Risks**

A significant risk is an identified and assessed risk of material misstatement that, in the auditor's judgement, requires special audit consideration.

Under ISA (UK) 240, there is a presumed risk of fraud in revenue recognition, albeit rebuttable. We do not believe the risk of fraud in revenue recognition is material to the financial statements.

However, our work will include identifying income streams received in the form of cash, the controls in place over cash and cyclical testing of the main income areas.

As part of our work to develop our audit plan, we have identified the following significant risks of material misstatement and our approach to address these risks.

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### **Significant Risk 1 Management override of controls**

Under ISA (UK) 240, there is a presumed significant risk of material misstatement due to fraud through management override of controls.

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### **Audit Response**

As required by ISA (UK) 240, we will:

- test the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements;
- Review accounting estimates for biases and evaluate whether the circumstances producing the bias, if any, represent a risk of material misstatement due to fraud;
- Consider significant transactions that are outside the normal course of business for the entity, or that otherwise appear to be unusual;
- [where there are specific additional risks of management override that are not covered as part of normal audit procedures, include here the audit response to these risks].

## **Significant Risk 2 Procurement**

In previous audits we raised issues in relation to procurement. We noted in the case of highest paid supplier testing that for 3 out of 5 tested we were unable to confirm that the contracts were awarded in compliance with the Council's procurement policy or that the process was equitable, legal and provided value for money.

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### **Audit Response**

We will:

- consider the processes and procedures in place around procurement; and
- review a sample of contracts awarded in year by the Council.

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## **Significant Risk 3 Management of Councils Land and Buildings**

In prior years, issues have been raised in relation to the timeliness of Council not renewing leases or conducting rent reviews on leases which have expired in relation to Commercial Leases. We note rent reviews for non-commercial leases were due to commence during 2023-24, however clarification and agreement from the Department was needed on whether Council should instruct a valuer to carry out rental valuations in light of value for money.

We note also that timely implementation of audit and other recommendations should be carried out.

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### **Audit Response**

We will:

- review Council's leases to ensure appropriate rent reviews have been completed and leases have been renewed on a timely basis;
- review Council's Land and Property policies and procedures in light of Extraordinary Audit findings;
- review a sample of land and building disposals during the financial year.

## 4. Audit Timetable, Fees and Staffing

### Timetable for Financial Audit

It is anticipated the audit will commencing week beginning 14 July 2025 with certification planned for 30th September 2025.

<b>MILESTONE</b>	<b>ESTIMATED DATE</b>
<b>Electronic version of draft financial statements provided to NIAO</b>	30 <sup>th</sup> June 2025
<b>Final audit testing commences</b>	w/c 14 <sup>th</sup> July 2025
<b>Audit Committee Meeting</b>	17 <sup>th</sup> September 2025
<b>Council Meeting to approve final accounts</b>	22 <sup>nd</sup> September 2025
<b>Signed financial statements and Letter of Representation provided to NIAO</b>	23 <sup>rd</sup> September 2025
<b>Financial statements certified by LGA</b>	30 <sup>th</sup> September 2025
<b>Provisional Report issued for management response</b>	12 <sup>th</sup> September 2025
<b>Final Report to those charged with Governance issued</b>	31 <sup>st</sup> October 2025
<b>Annual Audit Letter issued</b>	28 <sup>th</sup> November 2025

## **Submission of Accounts**

The Council is required to submit its account to the Department for Communities by 30 June following the year end. The Council should also send an electronic version of the accounts, along with the excel spreadsheet underpinning them, to NIAO at the same time as being sent to the Department.

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## **Public Notice**

The Local Government (Accounts and Audit) Regulations (Northern Ireland) 2015 requires the Council to give notice, by publication on its website, of the date from which the accounts and other documents are available for public inspection and the date from which the exercise of rights under Article 17 and 18 of the Order may be exercised. In the current audit timeframe, notice should be placed on websites in early July. The LGA usually writes to councils closer to the time to remind them of this requirement as the audit of the accounts cannot be certified as being completed until the notice period has been executed in full.

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## **Objections**

The 2005 Order allows objections to be raised from interested parties concerning the Council's accounts. We will hear and carefully consider representations by, and objections from, any such interested parties. In conducting our audit we may consider the lawfulness of items of account, the conduct of members and officers, instances where it appears a loss may have arisen and our other statutory duties required of the Local Government Auditor.

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## Improvement Audit and Assessment Timetable

MILESTONE	ESTIMATED DATE
<b>Council publishes Performance Improvement Plan</b>	Not later than 30 <sup>th</sup> June 2025*
<b>NIAO Planning and Fieldwork</b>	August to October 2025
<b>Council to publish an assessment and comparison of its performance</b>	No later than 30 <sup>th</sup> September 2025
<b>Draft S95 report issued to Chief Financial Officer for factual accuracy agreement</b>	14 <sup>th</sup> November 2025
<b>Final S95 report issued to the Council and the Department</b>	30 <sup>th</sup> November 2025
<b>Publication of Council's Annual Improvement Report</b>	No later than 31 <sup>st</sup> March 2026

\* The Act indicates that councils should publish their Performance Improvement Plan as soon as practical after the start of the financial year to which it relates. The Guidance recommends this is completed by the end of June to enable the LGA to meet the statutory reporting deadline of 30th November.

## **Fees**

The audit fee for this year is £79,800 for the financial audit and £25,000 for the performance improvement audit and assessment.

Completion of our audits in line with the timetable and fee is dependent upon:

- Causeway Coast and Glens Borough Council delivering on 30th June 2025 a complete Statement of Accounts of sufficient quality that have been subject to appropriate internal review.
  - Causeway Coast and Glens Borough Council delivering good quality supporting documentation and evidence, within the agreed timetable for both the financial and improvement audits; and
  - Appropriate client staff being available during the audit.
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## Audit team – Statement of Accounts and Proper Arrangements

TEAM MEMBER	RESPONSIBILITY
Patrick Barr <b>Engagement Director</b> 028 90 251063 Patrick.barr@niauditoffice.gov.uk	Overall responsibility for the audit, for ensuring an appropriate audit opinion is given and for liaison with Causeway Coast and Glens Borough Council and its Audit Committee.
Peter O’Sullivan <b>Engagement Manager</b> 028 90 251111 peter.osullivan@niauditoffice.gov.uk	Responsible for day to day management of the audit and audit team.
Andrea Quinn <b>Lead Auditor - Planning</b> 028 90 251068 Andrea.Quinn@niauditoffice.gov.uk	Responsible for detailed planning of the audit.
TBC <b>Lead Auditor – Fieldwork &amp; Completion</b>	Responsible for fieldwork and completion of the audit.

## Audit team – Improvement Audit and Assessment work

TEAM MEMBER	RESPONSIBILITY
Patrick Barr <b>Engagement Director</b> 028 90 251063 Patrick.barr@niauditoffice.gov.uk	Overall responsibility for the audit, for ensuring an appropriate audit opinion is given and for liaison with Causeway Coast and Glens Borough Council and its Audit Committee.
Peter O’Sullivan <b>Engagement Manager</b> 028 90 251111 peter.osullivan@niauditoffice.gov.uk	Responsible for day to day management of the audit and audit team.
Andrea Quinn <b>Lead Auditor</b> 028 90 251068 Andrea.quinn@niauditoffice.gov.uk	Responsible for detailed planning, fieldwork and completion of the audit.

## Appendix One: Good Practice Guides

The NIAO has produced a series of good practice guides for Northern Ireland public sector bodies. The following guides have been published in the last five years:

- **School Governance Good Practice Guide**  
*4 July 2023*
- **Innovation and Risk Management – A Good Practice Guide for the public sector**  
*27 June 2023*
- **Planning Fraud Risks**  
*1 March 2023*
- **Board Effectiveness – A Good Practice Guide**  
*22 June 2022*
- **Internal Fraud Risks**  
*24 February 2022*
- **Grant Fraud Risks**  
*28 October 2021*
- **A Strategic Approach to the Use of Public Sector Assets A Good Practice Guide for Local Government in Northern Ireland** *21 October 2021*
- **Procurement fraud risk guide**  
*24 November 2020*
- **Covid-19 fraud risks August 2020**  
*01 September 2020*
- **Raising concerns: A good practice guide for the Northern Ireland Public Sector**  
*25 June 2020*

These publications can be found [on our website](#).

## Appendix Two: Public Reports

### Relevant Public Reports

Public Reporting audit teams within NIAO undertake studies across the public sector. Public reports relevant to local government, published in the last three years, are as follows:

- **Local Government Auditors Report 2024**  
25 October 2024
  - **Public Bodies' Response to Misrepresented Soil Analysis**  
05 July 2024
  - **Review of Waste Management in Northern Ireland – Report**  
05 July 2024
  - **Local Government Auditors' Report 2023**  
15 December 2023
  - **Extraordinary Audit of Causeway Coast and Glens Borough Council**  
07 July 2022
  - **Planning in Northern Ireland**  
*01 February 2022*
  - **Local Government Annual Improvement Reports 2021/22**  
*31 March 2022*
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### Current and Planned Public Reporting Activities

The following are other NIAO public reporting examinations currently being completed which have relevance to the local government sector:

- **A Strategic Review of the Planning Appeals Commission** - A strategic review of the overall role and function of the Planning Appeals Commission, the range of challenges it is currently facing and the options available to improve performance and wider planning outcomes in Northern Ireland.
- **Waste Crime** – This study will consider the amount of waste that is dumped illegally each year in Northern Ireland, the resulting costs to the public sector, the attitudes to waste crime, the work NIEA does to combat waste crime, and NIEA's enforcement procedures and their effectiveness in reducing waste crime.

Proposals for future studies specific to local government are based on gathering an understanding of the sector and identifying areas where value for money might be at risk. This requires ongoing completion of routine survey work by the audit team and more detailed analysis of specific areas which show potential as future study topics. The audit team will liaise with the sector when carrying out this work.

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