

The Joint Audit Findings for The Police and Crime Commissioner for Cumbria and The Chief Constable of Cumbria Constabulary

Year ended 31 March 2022

23 November 2022



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Appendices

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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the PCC and Chief Constable or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

This Audit Findings presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260. Its contents have been discussed with management and the Joint Audit Committee.

Name: Michael Green For Grant Thornton UK LLP Date: 23 November 2022

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1. Headlines

This table summarises the key findings and other matters arising from the statutory audits of Cumbria Police and Crime Commissioner ('the PCC') and The Chief Constable of Cumbria Constabulary financial statements for the year ended 31 March 2022 for those charged with governance.

Financial Statements

Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion the financial statements:

- give a true and fair view of the financial positions of the PCC and Chief Constable's income and expenditure for the year; and
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.

We are also required to report whether other information published together with each set of audited financial statements (including the Annual Governance Statement (AGS) and Narrative Report is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

Our audit work was completed on site/remotely during July - November. Our findings are summarised on pages 5 to 19.

We have not identified any adjustments to the financial statements of the Chief Constable that have resulted in an adjustment to the Chief Constable's Comprehensive Income and Expenditure Statement. We have not identified any adjustments to the financial statements of the PCC that have resulted in an adjustment to the PCC's or Group Comprehensive Income and Expenditure Statement. One adjustment has been made affecting the PCC and Group Balance Sheet relating to the classification of two assets held for sale. Further detail is provided on page 26. We have highlighted two unadjusted misstatements which management chose not to amend and these are highlighted in Appendix B. Our follow up of recommendations from the prior year's audits are detailed in Appendix A.

Our work is substantially complete, our view is that the financial statements have been prepared to a high standard and supported by clear and comprehensive working papers. There are no matters of which we are aware that would require modification of our audit opinion for the PCC's financial statements (including the financial statements which consolidate the financial activities of the Chief Constable) or the Chief Constable's financial statements in Appendices E and F or material changes to the financial statements, subject to the following outstanding matters:

- finalising our work in respect of property, plant and equipment, employee benefits expenditure, creditors and pension liability;
- · receipt of management representation letter; and
- review of the final set of financial statements.

We have concluded that the other information to be published with each set of financial statements is consistent with our knowledge of your organisations and the financial statements we have audited.

Our anticipated audit report opinions will be unqualified.

1. Headlines

Value for Money (VFM) arrangements

Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to consider whether in our opinion, both entities have put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are now required to report in more detail on the overall arrangements, as well as key recommendations on any significant weaknesses in arrangements identified during the audit.

Auditors are required to report their commentary on the arrangements under the following specified criteria:

- Improving economy, efficiency and effectiveness;
- Financial sustainability; and
- Governance.

We have completed our VFM work, and our detailed commentary is set out in the separate Auditor's Annual Report, which is presented alongside this report. We are satisfied that the PCC and Chief Constable have made proper arrangements for securing economy, efficiency and effectiveness in their use of resources.

Statutory duties

The Local Audit and Accountability Act 2014 ('the Act') also requires us to:

- report to you if we have applied any of the additional powers and duties ascribed to us under the Act; and
- to certify the closure of the audits.

We have not exercised any of our additional statutory powers or duties.

We have completed the majority of our work under the Code and expect to be able to certify the completion of the audits when we give our audit opinions.

Significant Matters

We did not encounter any significant difficulties or identify any significant matters arising during our audit.

2. Financial Statements

Overview of the scope of our audit

This Joint Audit Findings Report presents the observations arising from the audits that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260 and the Code of Audit Practice ('the Code'). Its contents have been discussed with management and the Joint Audit Committee.

As auditor we are responsible for performing the audits, in accordance with International Standards on Auditing (UK) and the Code, which are directed towards forming and expressing an opinion on each set of 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 for the preparation of the financial statements.

Audit approach

Our audit approach was based on a thorough understanding of the group's/PCC and Chief Constable's business and is risk based, and in particular included:

- An evaluation of the PCC's and Chief Constable's internal controls environment, including its IT systems and controls:
- An evaluation of materiality considering the 'PCC and Chief Constable's gross revenue expenditure; and
- Substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks.

We have not had to alter our audit plan, as communicated to you in June 2022.

Conclusion

We have substantially completed our audits of your financial statements and, subject to outstanding queries being resolved, we anticipate issuing an unqualified audit opinion on the financial statements of both the PCC and the Chief Constable, as detailed in Appendix D and E. Outstanding items are detailed on page 3.

Acknowledgements

We would like to take this opportunity to record our appreciation for the assistance provided by the finance team and other staff.

2. Financial Statements



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.

Materiality levels remain the same as reported in our audit plan in June 2022.

We detail in the table opposite our determination of materiality.

	Group (£)	PCC (£)	CC (£)	Qualitative factors considered
Materiality for the financial statements	3,657,000	3,233,000	3,166,000	Financial performance, focussing on the expenditure.
Performance materiality	2,743,000	2,425,000	2,337,000	Quality of working papers in prior year and client's response to audit processes.
Trivial matters	183,000	162,000	156,000	The amount below which matters would be considered trivial to the reader of the accounts.
Materiality for senior officer remuneration	37,000	37,000	37,000	Materiality has been reduced for remuneration disclosures due to the sensitive nature and public interest.

We have determined financial statement materiality based on a proportion of the gross expenditure of the group, the PCC and the Chief Constable for the financial year. In the prior year we used the same benchmark. For our audit testing purposes we apply the lowest of these materialities, which is £3,166,000 (PY £3,052,000), which equates to 2% of the Chief Constable's prior year gross expenditure or the year.



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.

This section provides commentary on the significant audit risks communicated in the Audit Plan.

Management override of controls Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management over-ride of controls is present in all entities. The PCC and Chief Constable face 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, which was one of the most significant assessed risks of material misstatement.

Relates to Commentary

PCC / CC

/Group

We have:

- evaluated the design effectiveness of management controls over journals;
- analysed the journals listing and determined the criteria for selecting high risk unusual journals;
- identified and tested unusual journals made during the year and the accounts production stage for appropriateness and corroboration: and
- gained an understanding of the accounting estimates and critical judgements applied by management and considered their reasonableness.

A sample of journals was selected based on consideration of specific risk based criteria. Testing has not identified any instances of management override and journal entries are consistent with expectations. As part of our review of journal procedures we noted that only journal lines over £50k are approved by senior management, journal lines which are less than £50k are not approved. Our sample testing of journals, including those where journal lines were less than £50K did not identify any matters for concern with all journal lines appropriate and reasonable.

We did not identify any changes in accounting policies or estimation processes and review of key estimates has not identified any matters to bring to your attention.

Our audit work has not identified any evidence of management over-ride of controls.

From our review of all journals posted during the year, we identified specific routines including review of journals outside our range of expectations for certain journal posters, journals which were above performance materiality of £2.337m and processed after the year-end during the preparation of financial statements. This identified 29 journals for follow up review and testing. In addition, we performed testing of a further 21 journals identified through supplementary procedures focusing on a combination of risk based characteristics.



Risks identified in our Audit Plan	Relates to	Commentary
Improper revenue recognition Under ISA (UK) 240 there is a rebuttable presumed risk that revenue	CC / PCC / Group	As detailed in our Audit Plan, we do not consider this to be a significant risk for the PCC and the Chief Constable.
may be misstated due to the improper recognition of revenue. This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue		Having considered the risk factors set out in ISA 240 and the nature of the revenue streams, we have determined that the risk of fraud arising from revenue recognition can be rebutted for both the PCC and Chief Constable because:
recognition.		• there is little incentive to manipulate revenue recognition;
		• for the PCC opportunities to manipulate revenue recognition are very limited as revenue is principally grant allocations from central and local government;
		• for the Chief Constable opportunities to manipulate revenue recognition are very limited as revenue is principally an intergroup transfer from the PCC, with no cash transactions; and
		• the culture and ethical frameworks of both the PCC and Chief Constable, mean that all forms of fraud are seen as unacceptable.
		Whilst revenue and expenditure recognition was not identified as a significant risk, we have carried out procedures and detailed testing of material revenue streams to gain assurance over this area.
		We tested, on a sample basis, material revenue transactions, ensuring that it remained appropriate to rebut the presumed risk of revenue and expenditure recognition. We did not identify any matters to report to you or to change our assessment of the risk in this area.
Risk of fraud related to expenditure recognition - Practice Note 10 In line with the Public Audit Forum Practice Note 10, in the public	CC / PCC / Group	Our Audit Plan highlighted that we consider that we are able to rebut the significant risk in relation to expenditure as we concluded that there is no risk of material misstatement due to fraud relating to expenditure recognition.
sector, auditors must also consider the risk that material misstatements due to fraudulent financial reporting may arise from the manipulation of expenditure recognition (for instance by deferring expenditure to a later period).		As with revenue transactions, we have performed procedures to understand and test material expenditure streams. Our work in this area has not identified any matters to report to you or that would lead to a change in our risk assessment.
We have considered this risk for the Chief Constable, PCC and Group and have determined it to be appropriate to rebut this risk based upon the limited incentive and opportunity to manipulate expenditure.		

Risks identified in our Audit Plan	Relates to	Commentary

Valuation of land and buildings

The PCC and Group revalue their land and buildings on a rolling two-yearly basis. This valuation represents a significant estimate by management in the financial statements due to the size of the numbers involved (£60.029 million as at 31 March 2022) and the sensitivity of this estimate to changes in key assumptions. Additionally, management will need to ensure the carrying value in the PCC and Group financial statements is not materially different from the current value or the fair value (for surplus assets) at the financial statements date, where a rolling programme is used.

We therefore identified valuation of land and buildings, particularly revaluations and impairments, as a significant risk of material misstatement. We have:

PCC /

Group

- reviewed management's processes and assumptions for the calculation of the estimate,
- the instructions issued to valuation experts and the scope of their work;
- evaluated the competence, capabilities and objectivity of the valuation expert;
- written to the valuer to confirm the basis on which the valuation was carried out in order to ensure that the requirements of the Code are met:
- challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding; and
- tested revaluations made during the year to see if they had been input correctly into the PCC's asset register.

Our audit work is substantially complete and has not identified any key issues in respect to this significant risk. We have made a series of recommendations on page 13 in relation to asset lives and the asset register including assets which had been fully depreciated and had no remaining asset lives yet some of which remained operational.

Our review of the calculations performed by the valuer showed that the valuations had been based on realistic and sound assumptions supported by appropriate evidence including site plans verifying square meterage figures, building rate costs and rationale for various obsolescence factors applied.

Based on our audit work to date we are satisfied that the value of Property, Plant and Equipment is not materially misstated within the financial statements.

Risks identified in our Audit Plan

Relates to

Commentary

Valuation of pension fund net liability

The group's pension fund net liability, as reflected in its balance 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 (£1.521 billion in the group's balance sheet) and the sensitivity of the estimate to changes in key assumptions.

We therefore identified valuation of the group's pension fund net liability as a significant risk, which was one of the most significant assessed risks of material misstatement.

CC / PCC / We have:

Group

- updated our understanding of the processes and controls put in place by management to ensure that the PCC and CC's pension fund net liability is not materially misstated and evaluate the design of the associated controls;
- evaluated the instructions issued by management to their management experts (actuaries) for this estimate and the scope of the actuary's work;
- assessed the competence, capabilities and objectivity of the actuaries who carried out the pension fund valuations:
- assessed the accuracy and completeness of the information provided by the PCC and CC to the actuaries;
- tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial reports; and
- undertaken 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 procedures suggested within the report.

Page 12 provides a detailed assessment of the estimation process for the valuation of the pension fund net liability. Our review of the assumptions used in calculating the net pension liability of both schemes are considered to be in line with expectations and we have not identified any issues with the estimation process.

The PCC and CC were informed by Cumbria Pension Fund after the financial statements had been prepared that the figures provided for Local Government Pension Scheme (LGPS) asset values in the actuary report had been incorrect. As a result a revised actuary report was provided. The overall impact would be on the actuarial gain/loss on the pension asset/liability going through the Group Comprehensive Income and Expenditure Statement of £408k and a compensating adjustment to the Statement of Financial Position.

Management have chosen not to adjust for this as the figures are not material. We have recorded this as an unadjusted misstatement on page 27.

We have no further matters to report in respect of valuation of the pension fund liability and have gained suitable appropriate assurance to conclude that the net pension liability is fairly stated.

2. Financial Statements – key judgements and estimates

This section provides commentary on key estimates and judgements inline with the enhanced requirements for auditors.

Significant judgement or estimate	Relates to	Summary of management's approach	Audit Comments	Assessment
Land and Building valuations – £60.029m	PCC / Group	Land and buildings comprises £55.470m of specialised assets such as police stations, which are required to be valued at depreciated replacement cost (DRC) at year end, reflecting the cost of a modern equivalent asset necessary to deliver the same service provision. The remainder of other land and buildings (£4.559m) are not specialised in nature and are required to be valued at existing use in value (EUV) at year end. The PCC engaged Carigiet Cowen to complete the valuation of properties as at 31/3/2022 on a two yearly cyclical basis. The total year end valuation of land and buildings was £60.029m, a net increase of £2.972m from 2020/21.	The PCC's accounting policy on valuation of land and buildings is included in Note 9 to the financial statements. Key observations The values in the valuation report have been used to inform the measurement of property assets at valuation in the financial statements. The PCC has disclosed the estimation uncertainty related to the year-end valuations of land and buildings to the financial statements as set out above. • We assessed the qualifications, skills and experience of the Valuer and determined the service to be appropriate; • The underlying information prepared by the PCC and supplied by the Valuer was considered to be complete and accurate; • The Valuer prepared their valuations in accordance with the RICS Valuation – Global Standards using the information that was available to them at the valuation date in deriving their estimates; and Our review of the calculations performed by the valuer is substantially complete, demonstrating that the calculations had been based on realistic and sound assumptions supported by appropriate evidence as autlined on page 9. We consider the level of disclosure in the financial statements to be appropriate. Conclusion Based on our audit work to date we are satisfied that the estimate of your land and buildings valuation is not materially misstated.	Light purple

- Dark Purple We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- Blue
 We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
- Grey We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- Light Purple We consider management's process is appropriate and key assumptions are neither optimistic or cautious

2. Financial Statements - key judgements and estimates

Significant judgement or estimate	
Net pension liability -	
LGPS: £60.929m	
Police Officer Pension Scheme : £1.460bn	

PCC /

CC /

Group

Relates Summary of management's to approach

The PCC's and Chief Constable's total net pension liability at 31 March 2022 is £1.521bn (PY £1.522bn) comprising the Local Government Pension Scheme (LGPS) (The LGPS is a funded defined benefit scheme for police staff, administered by Cumbria County Council) and Police Officers Pension Scheme (the Chief Constable operates three pension schemes for police officers, these are the 1987, 2006, 2015 Police Pension Schemes for officers)

The PCC and Chief Constable uses GAD and Mercers to provide actuarial valuations of the Group's assets and liabilities derived from these schemes. A full actuarial valuation is required every three years. The latest full actuarial valuation was completed in 2022. A roll forward approach is used in intervening periods, which utilises key assumptions such as life expectancy, discount rates, salary growth and investment returns. Given the significant value of the net pension fund liability, small changes in assumptions can result in significant valuation movements.

Audit Comments

For both the LGPS and the three police officer pension schemes we have undertaken a review of the relevant actuary's work to satisfy ourselves that the pension liabilities are fairly stated in the financial statements. In doing so we engaged our own independent actuary to assess the methodology and assumptions used by the scheme's actuaries.

For both the LGPS and the police schemes we have reviewed the information submitted to the actuaries to confirm that it is consistent with underlying records. We have used PwC as auditors expert to assess the key actuary and assumptions made by actuary.

Assumptions	Actuary Value	PwC range	Assessment
Discount rate	2.8%	2.7% - 2.8%	•
Pension increase rate	3.2%	3.0% - 3.5%	•
Salary growth	4.7%	0.5% - 2.5% above pension increase	•
Life expectancy – Males currently aged 45 / 65	24.1 years / 22.6 years	22.2 – 24.8 years / 20.7 – 23.3 years	•
Life expectancy – Females currently aged 45 / 65	27.1 years / 25.3 years	25.7 – 27.5 years / 23.8 – 25.5 years	•

Based on our review of assumptions, judgements and estimation practices for both schemes, we have gained assurance that they are reasonable and that the net pension liability is materially correct.

Assessment

- Dark Purple We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- Blue We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic.
- Grey We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- Light Purple We consider management's process is appropriate and key assumptions are neither optimistic or cautious

Light purple

Assessment

2. Financial Statements - Internal Control

The following internal control issues were identified during our audit work, as highlighted below.

Assessment

Issue and risk

Assets with no remaining asset life yet still in asset register

Our review of the asset register identified a number of IT, Vehicle and Furniture, Equipment and Plant assets which had been fully depreciated and had no remaining asset life yet were potentially still in use. The impact of this is that the gross book value of these asset categories in disclosure Note 9 could be overstated. Assets are not automatically separately identified on the asset register with some grouped together making it difficult to quantify the value of assets which remain in use or have been disposed.

Where adaptations have been made to vehicle assets these are shown in total for the year rather than allocated or apportioned across the PCC's asset base. The adaptations have been allocated a one year life, rather than the asset life associated with the asset they relate to.

Recommendations

Management should:

- Review those assets which have no remaining asset life in the asset register to establish whether they remain in use or have been disposed and update the asset register accordingly, and remove assets no longer in use going forward.
- Undertake a review of asset lives to ensure that they remain appropriate.
- Individually identify specific assets within the asset register rather than group assets of a similar type.
- For vehicle adaptations set an appropriate basis of apportionment to ensure they are allocated across the PCC's vehicle asset base and depreciated over the appropriate life of the asset.

Management response

The recommendations made have been discussed with the audit team and are accepted. In response, a task and finish group will be established including representatives from financial services and the relevant lead department to address all of the above points. All nil remaining life assets will be reviewed to determine if these should be removed from the asset registers if they are no longer in use or the remaining life adjusted. In relation to vehicle adaptations, whilst it will not be possible to cost individual items to specific vehicles, a new methodology for notionally allocating these costs over vehicles purchased each year will be implemented with the result that adaptation costs will be depreciated over the life of individual vehicles. An additional step will be included to the final accounts process to ensure that these checks are repeated as part of each subsequent year end.

Assassment

- Significant deficiency risk of significant misstatement

 Deficiency risk of inconsequential misstatement
- Denciency risk of inconsequential misstar

2. Financial Statements - Internal Control

The following internal control issues were identified during our audit work, as highlighted below.

Assessment Issue and risk Recommendations



Automatic accruals

With the introduction of the new Oracle Fusion system in October 2020 automatic accruals for any goods received not invoiced (GRNI) were adopted. The accruals are made on a monthly basis and then reversed out the following month. Additionally at year end a list of open orders is reviewed by the relevant Financial Services Officer (FSO) to ensure that there are no open orders where receipting has potentially been missed.

From our review of journals we identified that a regular monthly journal for a significant amount which was reversed out the following month, in some months this was as large as £300m. This has been happening as the automatic accrual function on the new system had not been correctly understood.

A decision was made to switch off automatic accruals as at 31/03/22 until they could be certain that they were accurate. Procedures were put in place to ensure that the accruals were correct at year end, including running a report of all invoices over £10k and FSOs individually checking to ensure that all items are posted in the correct year.

Seek to investigate and address the issues within the new Oracle Fusion system to ensure that manual processes are not required for GRNI.

Management response

The finance, commercial and CSD teams are part of a continuous improvement group with the purpose of ensuring that financial systems and processes operate effectively. Work is ongoing to improve the quality of data in relation to open and receipted orders with the aim of reinstating the automatic accruals process. This however will only be done once assurance is obtained that the automatic accruals posted would be substantially correct.



Lack of third party assurance report for iTrent.

The CC and PCC outsources the hosting of it's payroll system, iTrent, to the vendor, Midland HR.

Our audit identified that there was no third party assurance report (ISAE 3000 or ISAE 3402) available to provide independent assurance over the controls operated by Midland HR.

Specifically, the PCC/CC and ourselves are unable to gain assurance over the appropriateness of privileged access to the iTrent database hosted by Midland HR, which if breached could lead to erroneous payroll transactions being made.

Please note that an ISO 27001 certification or an IT Health Check does not provide the required level of assurance.

Whilst we performed additional substantive procedures to gain sufficient and appropriate audit evidence in respect of payroll balances, it is recommended that management seek to obtain a third-party assurance report from Midland HR in respect of the outsourced hosting of iTrent.

This will help to provide us with assurance as external auditors but should also be obtained and reviewed periodically by management in order to gain assurance over the security of sensitive data, which includes high volumes of personally identifiable information.

Management response

The latest annual ISAE 3000 (SOC 2SM) Type II Service Auditors Assurance Report has been received from our suppliers MHR and shared with the auditors. Consideration will be given to whether or not the report should be requested on an annual basis although MHR have advised that there will be a cost of circa £9k per annum to provide this report in the future.

Accesement

- Significant deficiency risk of significant misstatement
- Deficiency risk of inconsequential misstatement

2. Financial Statements - Internal Control

Assessment

Issue and risk



IT Audit Findings

To support the financial statement audits of the Police and Crime Commissioner and the Chief Constable of Cumbria Constabulary (the Force) for the year ended 31 March 2022, we completed a design and implementation review of the IT General Controls (ITGC) for applications identified as relevant to the audit.

No deficiencies were identified from this work, however a small number of improvement opportunities were identified, to prevent inappropriate access to the Oracle system and the ability to create erroneous transactions:

- Use of highly privileged roles in Oracle Cloud.
- Lack of audit logging in Oracle Cloud.
- Timeliness of access revocation.

Recommendations

1. The PCC and CC should consider reducing the levels of access for three users with the Application Implementation Consultant role and replacing it with a less privileged role for day-to-day activities.

Management response

The use of the Application Implementation Administrator role is being trialled with the Financial Services Assistant (Systems) role to see if they can do all day to day activities with this role assigned. Once the trial is concluded a decision will be made.

- 2. It is recommended that the PCC and CC implement audit logging for financially critical areas including, but not limited to:
- Accounts Payable (including Suppliers);
- Cash Management;
- · Accounts Receivable; and
- General Ledger.

The auditing should be sufficiently detailed to capture any changes made to Oracle Cloud such as changes to workflow approval rules or system configurations.

Management response

The switching on of the audit logging will be investigated as a matter of urgency.

3. It is recommended that the PCC and CC implement a process to ensure that leaver's access to Oracle Cloud is terminated within one working day of their termination date.

The Force should also consider setting up the Import User Login History Process in Oracle Cloud. This will enable the Force to identify the last login date of individual users.

Management response

Processes will be reviewed to improve the recommendation made through automation, to notify key business systems analysts of leavers within 24 hrs. Once notification is made then this will be requested through day business. Contingencies are in place that once all system responsibilities have been removed for leavers on all Constabulary systems, there is no access to the network and therefore no access to Oracle Cloud as the server is whitelisted to only Constabulary IP addresses.

Assessment

Significant deficiency – risk of significant misstatement

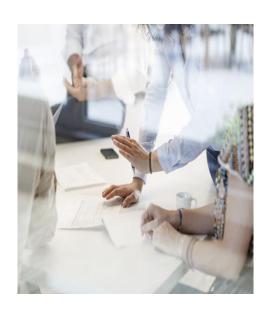
Deficiency - risk of inconsequential misstatement

2. Financial Statements - other communication requirements

We set out below details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

Issue	Commentary
Matters in relation to fraud	We have previously discussed the risk of fraud with the Joint Audit Committee. We have not been made aware of any other incidents in the period and no other issues have been identified during the course of our audit procedures.
Matters in relation to related parties	We are not aware of any related parties or related party transactions which have not been disclosed.
Matters in relation to laws and regulations	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
Written representations	Letters of representation has been requested from both the PCC and the Chief Constable.

2. Financial Statements - other communication requirements



Issue	Commentary	
Confirmation requests from third parties	We requested from management permission to send confirmation requests in relation to cash and investment balances. This permission was granted and the requests were sent. All of these requests were returned with positive confirmation.	
Accounting practices	We have evaluated the appropriateness of the PCC's and CC's accounting policies, accounting estimates and financial statement disclosures. Our review found no material omissions in the financial statements.	
Audit evidence All information and explanations requested from management was provided. and explanations/ significant difficulties		

2. Financial Statements - other communication requirements



Our responsibility

As auditors, we are required to "obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern" (ISA (UK) 570).

Issue

Commentary

Going concern

In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies.

Practice Note 10 sets out the following key principles for the consideration of going concern for public sector entities:

- the use of the going concern basis of accounting is not a matter of significant focus of the auditor's time and
 resources because the applicable financial reporting frameworks envisage that the going concern basis for
 accounting will apply where the entity's services will continue to be delivered by the public sector. In such
 cases, a material uncertainty related to going concern is unlikely to exist, and so a straightforward and
 standardised approach for the consideration of going concern will often be appropriate for public sector
 entities; and
- for many public sector entities, the financial sustainability of the reporting entity and the services it provides is more likely to be of significant public interest than the application of the going concern basis of accounting. Our consideration of the PCC's and Chief Constable's financial sustainability is addressed by our value for money work, which is covered elsewhere in this report.

Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by the PCC and Chief Constable meets this criteria, and so we have applied the continued provision of service approach. In doing so, we have considered and evaluated:

- · the nature of the PCC and Chief Constable and the environment in which they operate;
- the PCC's and Chief Constable's financial reporting framework;
- the PCC's and Chief Constable's system of internal control for identifying events or conditions relevant to going concern; and
- management's going concern assessment.

On the basis of this work, we have obtained sufficient appropriate audit evidence to enable us to conclude that:

- a material uncertainty related to going concern has not been identified for either the PCC or the Chief Constable; and
- management's use of the going concern basis of accounting in the preparation of both sets of financial statements is appropriate.

2. Financial Statements - other responsibilities under the Code

Issue	Commentary
Other information	We are required to give an opinion on whether the other information published together with each set of audited financial statements including the Annual Governance Statement and Narrative Report, is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.
	No inconsistencies have been identified.
	We plan to issue an unmodified opinion in this respect – refer to Appendix D and E.
Matters on which we report by exception	We are required to report on a number of matters by exception in a number of areas:
	 if the Annual Governance Statements do not comply with disclosure requirements set out in CIPFA/SOLACE guidance or are misleading or inconsistent with the information of which we are aware from our audits,
	 if we have applied any of our statutory powers or duties.
	 where we are not satisfied in respect of arrangements to secure value for money and have reported a significant weakness.
	We have nothing to report on these matters.



2. Financial Statements - other responsibilities under the Code

Issue	Commentary	
Specified procedures for Whole of Government Accounts	We are required to carry out specified procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions. The group audit instructions have not yet been issued for 2021/22 but we anticipate that in the case of the Group and CC, no substantive work will be required as both financial statements are below the audit threshold determined by the NAO.	
Certification of the closure of the audit	We intend to delay the certification of the closure of the 2021/22 audit of the Police and Crime Commissioner for Cumbria and the Chief Constable of Cumbria Constabulary as we are unable to conclude work in relation to Whole of Government Accounts.	

3. Value for Money arrangements

Approach to Value for Money work for 2021/22

The National Audit Office issued its guidance for auditors to consider whether the body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

When reporting on these arrangements, the Code requires auditors to structure their commentary on arrangements under the three specified reporting criteria.





Improving economy, efficiency and effectiveness

Arrangements for improving the way the body delivers its services. This includes arrangements for understanding costs and delivering efficiencies and improving outcomes for service users.



Financial Sustainability

Arrangements for ensuring the body can continue to deliver services. This includes planning resources to ensure adequate finances and maintain sustainable levels of spending over the medium term (3-5 years)



Governance

Arrangements for ensuring that the body makes appropriate decisions in the right way. This includes arrangements for budget setting and management, risk management, and ensuring the body makes decisions based on appropriate information

Potential types of recommendations

A range of different recommendations could be made following the completion of work on the body's arrangements to secure economy, efficiency and effectiveness in its use of resources, which are as follows:



Statutory recommendation

Written 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

3. VFM - our procedures and conclusions

We have completed our VFM work and our detailed commentary is set out in the separate Auditor's Annual Report.

As part of our work, we considered whether there were any risks of significant weakness in the PCC and Chief Constable's arrangements for securing economy, efficiency and effectiveness in its use of resources. We did not identify any risks of significant weakness.

Criteria	Risk assessment	sk assessment 2020/21 Auditor Judgment		2021/22 Auditor Judgment		Direction of travel
Financial sustainability	No risks of significant weakness identified		No significant weaknesses in arrangements identified, but improvement recommendations made.		No significant weaknesses in arrangements identified, but improvement recommendations made.	\leftrightarrow
Governance	No risks of significant weakness identified		No significant weaknesses in arrangements identified.		No significant weaknesses in arrangements identified.	\leftrightarrow
Improving economy, efficiency and effectiveness	No risks of significant weakness identified		No significant weaknesses in arrangements identified.		No significant weaknesses in arrangements identified.	\(\)

We are satisfied that the PCC and Chief Constable have made proper arrangements for securing economy, efficiency and effectiveness in their use of resources.

4. Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Financial Reporting Council's Ethical Standard and confirm that we, as a firm, and each covered person, are independent and are able to express an objective opinion on the financial statements

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard 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.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Details of fees charged are detailed in Appendix C.

Transparency

Grant Thornton publishes an annual Transparency Report, which sets out details of the action we have taken over the past year to improve audit quality as well as the results of internal and external quality inspections. For more details see Transparency report 2020 (grantthornton.co.uk)

Audit and non-audit services

No non-audit services were provided from the beginning of the financial year to November 2022.

Appendices

A. Follow up of prior year recommendations

We identified the following issues in the audits of Cumbria PCC and Chief Constable's 2020/21 financial statements, which resulted in 1 recommendation being reported in our 2020/21 Audit Findings report. We are pleased to report that management has made progress with our recommendation.

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue	
✓	IT Control Issues - Inappropriate assignment of administrator access	order to make any configuration changes for the Oracle Fusion System. Access is required to the finance modules in order to provide assistance to users with any issues as well as to run system processes for subledger transfers. The	
	It was noted that two Finance users have privileged access via "Application Implementation Consultant" role in the Oracle production environment. Management last year agreed to undertake a of the		
	access rights and the Application Implementation Consultant role will be removed from those not requiring it. Where not possible for systems management reasons, the financial access would be reviewed.	We are looking into the possibility of restricting the privileged role to one of the Application Administrator Roles but further testing is required to ensure that this role does not limit capability with regards to system configuration.	
	Where it is not possible to provide complete segregation of duties, a process would be established to produce periodic system reports of detailed transactions and these will be assessed by the Deputy CFO or Joint CFO.		

Assessment



X Not yet addressed

B. Audit Adjustments - PCC and CC

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.



Impact of adjusted misstatements - PCC

All adjusted misstatements are set out in detail below along with the impact on the key statements and the reported net expenditure for the year ending 31 March 2022.

Detail	Expenditure Statement £'000	Position £' 000	expenditure £'000
Assets held for Sale	nil	Other Land and Buildings	nil
The PCC was marketing Hunter Lane and		– 410k	
William Street Police Garages as available for sale. Both assets had been disclosed on		Assets held for Sale +410k	
the balance sheet within Land and Buildings			
rather than separately disclosed as an Asset Held for Sale.			
Overall impact	£nil	£nil	£nil

Impact of adjusted misstatements - CC

We have not identified any adjustments which will impact on the key statements and the reported net expenditure for the year ending 31 March 2022.

B. Audit Adjustments - PCC



Impact of unadjusted misstatements - PCC

The table below provides details of adjustments identified during the 2021/22 audit which have not been made within the final set of financial statements. The PCC is required to approve management's proposed treatment of all items recorded within the table below.

Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Reason for not adjusting
Income from Council Tax			
Figures for the PCC's share of Council tax income were prepared on 06/06/22. At this point the figures for Eden District Council had not been received and as such an estimate was included in the income from council tax figure.	- 449k	-449k	Not material
Subsequently, Eden provided their figures. The PCC was also advised that two other districts had made errors in their submissions. The PCC decided not to amend their financial statements in relation to the errors or the revised Eden figures. The total value of the misstatement is £449k understatement of income from council tax.			
Overall impact	-£449k	-£449k	

B. Audit Adjustments - PCC and CC



Impact of unadjusted misstatements – PCC and CC

The table below provides details of adjustments identified during the 2021/22 audit which have not been made within the final set of financial statements. The Chief Constable is required to approve management's proposed treatment of all items recorded within the table below.

Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Reason for not adjusting
Pension - actuarial IAS 19 asset valuations			
The PCC and CC were informed by Cumbria Pension Fund after the financial statements had been prepared that the figures provided for Local Government	+408	+408	Not material
Pension Scheme (LGPS) asset values in the actuary report had been incorrect. As a esult a revised actuary report was provided. The overall impact would be on the actuarial gain/loss on the pension asset/liability going through the Group Comprehensive Income and Expenditure Statement and a compensating adjustment to the Police Pensions reserve in the Statement of Financial Position.	(CC 398k PCC 10K)	(CC 398k PCC 10K)	
Overall impact	+£408k	+£408k	

B. Audit Adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.



Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

Disclosure omission	Relates to	Auditor recommendations	Adjusted?	
Audit Fees (Note 26) The audit fee note was based on based on the prior years figure leading to a £5.2k under accrual.	PCC and CC	Audit fees note amended to reflect the actual amount payable for external audit services.	✓	
Grant Income (Note 27)	PCC	The format of note 27 to be amended to include another	✓	
The Police Pension Grant had been incorrectly disclosed within the note as a credit to taxation and non specific grants rather than a credit on the Comprehensive Income and Expenditure Statement within Other Operating Expenditure.		sub heading referring to the credit on the Comprehensive Income and Expenditure Statement within Other Operating Expenditure.		
Pension Challenge (Note 33 PCC, Note 20 CC)	PCC and CC	Note updated to reflect the nationally agreed wording.	✓	
The Pension Challenge note required updating to reflect nationally agreed wording that was only made available after the statements had been prepared.				

B. Audit Adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.



Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

Disclosure omission	Relates to	Auditor recommendations	Adjusted?
Throughout the accounts	PCC and CC	Minor amendments made where required	✓
A number of miscellaneous minor amendments were made to the financial statements due to matters identified throughout the course of the audit. None of these are considered individually significant to warrant further disclosure.			

C. Fees

We confirm below our final fees charged for the audit and confirm there were no fees for the provision of non audit services.

Audit fees	Proposed fee	Final fee
PCC Audit	£41,427	£41,427
Chief Constable Audit	£17,963	£17,963
Total audit fees (excluding VAT)	£59,210	£59,210

The fees reconcile to the financial statements

Our audit opinion is included below.

We anticipate we will provide the PCC with an unmodified audit report

Independent auditor's report to the Police and Crime Commissioner for Cumbria Report on the Audit of the Financial Statements

Opinion on financial statements

We have audited the financial statements of the Police and Crime Commissioner for Cumbria (the 'Police and Crime Commissioner') and its subsidiary the Chief Constable (the 'group') for the year ended 31 March 2022 which comprise the Comprehensive Income and Expenditure Statement, the Movement in Reserves Statement, the Balance Sheet, the Cash Flow Statement and notes to the financial statements, including a summary of significant accounting policies and include the police pension fund financial statements comprising the Fund Account, the Net Assets Statement and notes to the financial statements. The notes to the financial statements include the Notes to the Accounts, Annex A - Statement of Accounting Policies, Annex B Technical Annex – Financial Instrument Disclosures and Annex C – Pension Disclosures. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2021/22.

In our opinion, the financial statements:

- give a true and fair view of the financial position of the group and of the Police and Crime Commissioner as at 31 March 2022 and of the group's expenditure and income and the Police and Crime Commissioner's expenditure and income for the year then ended;
- have been properly prepared in accordance with the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law, as required by the Code of Audit Practice (2020) ("the Code of Audit Practice") approved by the Comptroller and Auditor General. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Police and Crime Commissioner and the group 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, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We are responsible for concluding on the appropriateness of the Joint Chief Finance Officer's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Police and Crime Commissioner and group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Police and Crime Commissioner and the group to cease to continue as a going concern.

In our evaluation of the Joint Chief Finance Officer's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22 that the Police and Crime Commissioner and group's financial statements shall be prepared on a going concern basis, we considered the inherent risks associated with the continuation of services

provided by the Police and Crime Commissioner and the group. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2020) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the Police and Crime Commissioner and group and the Police and Crime Commissioner and group's disclosures over the going concern period.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Police and Crime Commissioner's and the group's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

In auditing the financial statements, we have concluded that the Joint Chief Finance Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

The responsibilities of the Joint Chief Finance Officer's with respect to going concern are described in the 'Responsibilities of the Police and Crime Commissioner and the Joint Chief Finance Officer's for the financial statements' section of this report.

Other information

The Joint Chief Finance Officer's is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the Police and Crime Commissioner and group financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge of the Police and Crime

Commissioner and the group obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Other information we are required to report on by exception under the Code of Audit Practice

Under the Code of Audit Practice published by the National Audit Office in April 2020 on behalf of the Comptroller and Auditor General (the Code of Audit Practice) we are required to consider whether the Annual Governance Statement does not comply with the 'delivering good governance in Local Government Framework 2016 Edition' published by CIPFA and SOLACE or is misleading or inconsistent with the information of which we are aware from our audit. We are not required to consider whether the Annual Governance Statement addresses all risks and controls or that risks are satisfactorily addressed by internal controls.

We have nothing to report in this regard.

Opinion on other matter required by the Code of Audit Practice

In our opinion, based on the work undertaken in the course of the audit of the financial statements and our knowledge of the Police and Crime Commissioner, the other information published together with the financial statements in the Statement of Accounts, for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make a written recommendation to the Police and Crime Commissioner under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

Responsibilities of the Police and Crime Commissioner and the Joint Chief Finance Officer for the financial statements

As explained more fully in the Statement of Responsibilities set out on page(s) 23 to 24, the Police and Crime Commissioner is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. That officer is the Joint Chief Finance Officer. The Joint Chief Finance Officer is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22, for being satisfied that they give a true and fair view, and for such internal control as the Joint Chief Finance Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Joint Chief Finance Officer is responsible for assessing the Police and Crime Commissioner's and the group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention by government that the services provided by the Police and Crime Commissioner and the group will no longer be provided.

The Police and Crime Commissioner is Those Charged with Governance. Those charged with governance are responsible for overseeing the financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. Owing to the inherent limitations of an audit, there is an unavoidable risk that material

misstatements in the financial statements may not be detected, even though the audit is properly planned and performed in accordance with the ISAs (UK).

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Police and Crime Commissioner and the group and determined that the most significant, which are directly relevant to specific assertions in the financial statements, are those related to the reporting frameworks (international accounting standards as interpreted and adapted by the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22, The Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015, the Local Government Act 2003 and the Police Reform and Social Responsibility Act 2011). We also identified the following additional regulatory frameworks in respect of the police pension fund, Public Service Pensions Act 2013, The Police Pension Fund Regulations 2006.
- We enquired of senior officers and the Police and Crime Commissioner, concerning the Police and Crime Commissioner and group's policies and procedures relating to:
- the identification, evaluation and compliance with laws and regulations;
- the detection and response to the risks of fraud; and
- the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.
- We enquired of senior officers, internal audit and the Police and Crime Commissioner, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.
- We assessed the susceptibility of the Police and Crime Commissioner and group's financial statements to material misstatement, including how fraud might occur, by evaluating officers' incentives and opportunities for manipulation of the financial

statements. This included the evaluation of the risk of management override of controls. We determined that the principal risks were in relation to

- non-routine journal entries, and key accounting estimates around the valuation of land and buildings and the pension liability.
- Our audit procedures involved:
- evaluation of the design effectiveness of controls that the Chief Finance Officer has in place to prevent and detect fraud;
- journal entry testing, with a focus on non-routine transactions;
- challenging assumptions and judgements made by management in its significant accounting estimates in respect of the valuation of land and buildings and the pension liability;
- assessing the extent of compliance with the relevant laws and regulations as part of our procedures on the related financial statement item.
- These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error and detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed noncompliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.
- The team communications in respect of potential non-compliance with relevant laws and regulations, including the potential for fraud in revenue and expenditure recognition, and the significant accounting estimates related to the valuation of land and buildings and the LGPS and Police pension liability.

- Our assessment of the appropriateness of the collective competence and capabilities of the Police and Crime Commissioner and group's engagement team included consideration of the engagement team's.
- understanding of, and practical experience with audit engagements of a similar nature and complexity through appropriate training and participation
- knowledge of the police sector
- understanding of the legal and regulatory requirements specific to the Police and Crime Commissioner and group including:
- the provisions of the applicable legislation
- guidance issued by CIPFA, LASAAC and SOLACE
- the applicable statutory provisions.
- In assessing the potential risks of material misstatement, we obtained an understanding of:
- the Police and Crime Commissioner and group's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
- the Police and Crime Commissioner and group's control environment, including the policies and procedures implemented by the Police and Crime Commissioner and group to ensure compliance with the requirements of the financial reporting framework.

Report on other legal and regulatory requirements - the Police and Crime Commissioner's arrangements for securing economy, efficiency and effectiveness in its use of resources

Matter on which we are required to report by exception – the Police and Crime Commissioner's arrangements for securing economy, efficiency and effectiveness in its use of resources

Under the Code of Audit Practice, we are required to report to you if, in our opinion, we have not been able to satisfy ourselves that the Police and Crime Commissioner has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2022.

We have nothing to report in respect of the matter above.

Responsibilities of the Police and Crime Commissioner

The Police and Crime Commissioner is responsible for putting in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

Auditor's responsibilities for the review of the Police and Crime Commissioner's arrangements for securing economy, efficiency and effectiveness in its use of resources

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to be satisfied that the Police and Crime Commissioner has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Police and Crime Commissioner's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

We undertake our review in accordance with the Code of Audit Practice, having regard to the guidance issued by the Comptroller and Auditor General in December 2021. This guidance sets out the arrangements that fall within the scope of 'proper arrangements'. When reporting on these arrangements, the Code of Audit Practice requires auditors to structure their commentary on arrangements under three specified reporting criteria:

- Financial sustainability: how the Police and Crime Commissioner plans and manages its resources to ensure it can continue to deliver its services:
- Governance: how the Police and Crime Commissioner ensures that it makes informed decisions and properly manages its risks; and
- Improving economy, efficiency and effectiveness: how the Police and Crime Commissioner uses information about its costs and performance to improve the way it manages and delivers its services.

We document our understanding of the arrangements the Police and Crime Commissioner has in place for each of these three specified reporting criteria, gathering sufficient evidence to support our risk assessment and commentary in our Auditor's Annual Report. In undertaking our work, we consider whether there is evidence to suggest that there are significant weaknesses in arrangements.

Report on other legal and regulatory requirements - Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate for the Police and Crime Commissioner for Cumbria for the year ended 31 March 2022 in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice until we have completed:

• our work on the Police and Crime Commissioner's arrangements for securing economy, efficiency and effectiveness in its use of resources and issued our Auditor's Annual Report.

• the work necessary to issue our Whole of Government Accounts (WGA) Component Assurance statement for the Police and Crime Commissioner for the year ended 31 March 2022.

We are satisfied that this work does not have a material effect on the financial statements for the year ended 31 March 2022.

Use of our report

This report is made solely to the Police and Crime Commissioner, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited.

Our audit work has been undertaken so that we might state to the Police and Crime Commissioner those matters we are required to state to the Police and Crime Commissioner in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Police and Crime Commissioner as a body, for our audit work, for this report, or for the opinions we have formed.

[Signature]

Michael Green, Key Audit Partner

for and on behalf of Grant Thornton UK LLP, Local Auditor

Manchester

[Date]

Independent auditor's report to the Chief Constable of Cumbria Constabulary Report on the Audit of the Financial Statements

Opinion on financial statements

We have audited the financial statements of the Chief Constable of Cumbria Constabulary (the 'Chief Constable') for the year ended 31 March 2021 which comprise the Comprehensive Income and Expenditure Statement, the Movement in Reserves Statement, the Balance Sheet, the Cash Flow Statement and notes to the financial statements, including a summary of significant accounting policies, and include the police pension fund financial statements comprising the Fund Account, the Net Assets Statement and notes to the financial statements, including a summary of significant accounting policies, and include the Police Officer Pension Fund financial statements comprising the Fund Account, the Net Assets Statement and notes to the financial statements. The notes to the financial statements include the Notes to the Accounts, Annex A - Statement of Accounting Policies, Annex B Technical Annex - Financial Instrument Disclosures and Annex C - Pension Disclosures. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom 2021/22.

In our opinion, the financial statements:

- give a true and fair view of the financial position of the Chief Constable as at 31 March 2022 and of its expenditure and income for the year then ended;
- have been properly prepared in accordance with the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law, as required by the Code of Audit Practice (2020) ("the Code of Audit Practice") approved by the Comptroller and Auditor General. Our responsibilities under those standards are further

described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Chief Constable 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, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We are responsible for concluding on the appropriateness of the Joint Chief Finance Officer's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Chief Constable's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Chief Constable to cease to continue as a going concern.

In our evaluation of the Joint Chief Finance Officer's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22 that the Chief Constable's financial statements shall be prepared on a going concern basis, we considered the

inherent risks associated with the continuation of services provided by the Chief Constable. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2020) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the Chief Constable and the Chief Constable's disclosures over the going concern period.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Chief Constable's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

In auditing the financial statements, we have concluded that the Joint Chief Finance Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

The responsibilities of the Joint Chief Finance Officer with respect to going concern are described in the 'Responsibilities of the Chief Constable and the Joint Chief Finance Officer for the financial statements' section of this report.

Other information

The Joint Chief Finance Officer is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge of the Chief Constable

obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Other information we are required to report on by exception under the Code of Audit Practice

Under the Code of Audit Practice published by the National Audit Office in April 2020 on behalf of the Comptroller and Auditor General (the Code of Audit Practice) we are required to consider whether the Annual Governance Statement does not comply with the 'delivering good governance in Local Government Framework 2016 Edition' published by CIPFA and SOLACE or is misleading or inconsistent with the information of which we are aware from our audit. We are not required to consider whether the Annual Governance Statement addresses all risks and controls or that risks are satisfactorily addressed by internal controls.

We have nothing to report in this regard.

Opinion on other matter required by the Code of Audit Practice

In our opinion, based on the work undertaken in the course of the audit of the financial statements and our knowledge of the Chief Constable, the other information published together with the financial statements in the Statement of Accounts for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make a written recommendation to the Chief Constable under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

Responsibilities of the Chief Constable and the Joint Chief Finance Officer for the financial statements

As explained more fully in the Statement of Responsibilities set out on page 22, the Chief Constable is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. That officer is the Joint Chief Finance Officer. The Joint Chief Finance Officer is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22, for being satisfied that they give a true and fair view, and for such internal control as the Joint Chief Finance Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Joint Chief Finance Officer is responsible for assessing the Chief Constable's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention by government that the services provided by the Chief Constable will no longer be provided.

The Chief Constable is Those Charged with Governance. Those charged with governance are responsible for overseeing the financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. Owing to the inherent limitations of an audit, there is an unavoidable risk that material misstatements in the financial statements may not be detected, even though the audit is properly planned and performed in accordance with the ISAs (UK).

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Chief Constable and determined that the most significant ,which are directly relevant to specific assertions in the financial statements, are those related to the reporting frameworks (international accounting standards as interpreted and adapted by the CIPFA/LASAAC Code of practice on local authority accounting in the United Kingdom 2021/22, The Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015, the Local Government Act 2003 and the Police Reform and Social Responsibility Act 2011. We also identified the following additional regulatory frameworks in respect of the police pension fund, Public Service Pensions Act 2013, The Police Pension Fund Regulations 2007, The Police Pensions Regulations 2015, and The Police Pensions Regulations 2006.
- We enquired of senior officers and the Chief Constable, concerning the Chief Constable's policies and procedures relating to:
- the identification, evaluation and compliance with laws and regulations;
- the detection and response to the risks of fraud; and
- the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.
- We enquired of senior officers, internal audit and the Chief Constable, whether they
 were aware of any instances of non-compliance with laws and regulations or whether
 they had any knowledge of actual, suspected or alleged fraud.
- We assessed the susceptibility of the Chief Constable's financial statements to material misstatement, including how fraud might occur, by evaluating officers' incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk of management override of control. We determined that the principal risks were in relation to:

- non-routine journal entries, and key accounting estimates around valuation of net pension liability.
- Our audit procedures involved:
- evaluation of the design effectiveness of controls that the Joint Chief Finance Officer has in place to prevent and detect fraud;
- journal entry testing, with a focus on non-routine transactions;
- challenging assumptions and judgements made by management in its significant accounting estimates in respect of the valuation of land and buildings and the pension liability;
- assessing the extent of compliance with the relevant laws and regulations as part of our procedures on the related financial statement item.
- These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error and detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed noncompliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.
- The team communications in respect of potential non-compliance with relevant laws and regulations, including the potential for fraud in revenue and expenditure recognition, and the significant accounting estimates related to the LGPS and Police pension liability.
- Our assessment of the appropriateness of the collective competence and capabilities of the engagement team included consideration of the engagement team's.
- understanding of, and practical experience with audit engagements of a similar

nature and complexity through appropriate training and participation

- knowledge of the police sector
- understanding of the legal and regulatory requirements specific to the Chief Constable including:
- the provisions of the applicable legislation
- guidance issued by CIPFA, LASAAC and SOLACE
- the applicable statutory provisions.
- In assessing the potential risks of material misstatement, we obtained an understanding of:
- the Chief Constable's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
- the Chief Constable's control environment, including the policies and procedures implemented by the Chief Constable to ensure compliance with the requirements of the financial reporting framework.

Report on other legal and regulatory requirements - the Chief Constable's arrangements for securing economy, efficiency and effectiveness in its use of resources

Matter on which we are required to report by exception – the Chief Constable's arrangements for securing economy, efficiency and effectiveness in its use of resources

Under the Code of Audit Practice, we are required to report to you if, in our opinion, we have not been able to satisfy ourselves that the Chief Constable has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2022.

We have nothing to report in respect of the above matter.

Responsibilities of the Chief Constable

The Chief Constable is responsible for putting in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

Auditor's responsibilities for the review of the Chief Constable's arrangements for securing economy, efficiency and effectiveness in its use of resources

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to be satisfied that the Chief Constable has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Chief Constable's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

We undertake our review in accordance with the Code of Audit Practice, having regard to the guidance issued by the Comptroller and Auditor General in December 2021. This guidance sets out the arrangements that fall within the scope of 'proper arrangements'. When reporting on these arrangements, the Code of Audit Practice requires auditors to structure their commentary on arrangements under three specified reporting criteria:

- Financial sustainability: how the Chief Constable plans and manages its resources to ensure it can continue to deliver its services;
- Governance: how the Chief Constable ensures that it makes informed decisions and properly manages its risks; and
- Improving economy, efficiency and effectiveness: how the Chief Constable uses information about its costs and performance to improve the way it manages and delivers its services.

We document our understanding of the arrangements the Chief Constable has in place for each of these three specified reporting criteria, gathering sufficient evidence to support our risk assessment and commentary in our Auditor's Annual Report. In undertaking our work, we consider whether there is evidence to suggest that there are significant weaknesses in arrangements.

Report on other legal and regulatory requirements - Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate for Chief Constable of Cumbria Constabulary for the year ended 31 March 2022 in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice until we have completed:

- our work on the Chief Constable's arrangements for securing economy, efficiency and effectiveness in its use of resources and issued our Auditor's Annual Report,
- the work necessary to issue our Whole of Government Accounts (WGA) Component Assurance statement for the Chief Constable for the year ended 31 March 2022.

We are satisfied that this work does not have a material effect on the financial statements for the year ended 31 March 2022.

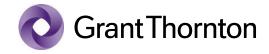
Use of our report

This report is made solely to the Chief Constable, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the Chief Constable those matters we are required to state to the Chief Constable in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Chief Constable as a body, for our audit work, for this report, or for the opinions we have formed.

Michael Green, Key Audit Partner for and on behalf of Grant Thornton UK LLP, Local Auditor

Manchester

[Date]



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