

Report of Deficiencies in Internal Controls

City and County of Swansea

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The team who delivered the work comprised Kevin Williams, Engagement Leader and Rebecca Nelson, Engagement Manager of PricewaterhouseCoopers LLP.

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As part of the 2013-14 audit, internal control deficiencies have been identified which merit reporting to Audit Committee.

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Summary report

Introduction

1. Anthony Barrett, as Appointed Auditor, is responsible for providing an opinion on whether the financial statements give a true and fair view of the financial position of City and County of Swansea (“the Authority”) at 31 March 2014 and its income and expenditure for the year then ended.
2. The Appointed Auditor is required to obtain an understanding of the internal controls relevant to the audit when identifying and assessing the risks of material misstatement. The Authority’s internal controls were considered in order to design audit procedures, to provide sufficient assurance to allow the Appointed Auditor to express an opinion on the truth and fairness of the financial statements. They were not considered for the purposes of expressing an opinion on the effectiveness of internal control.

No significant deficiencies in internal control have been identified, however recommendation have been raised for the Authority in order to further improve its control environment

3. This work has been completed, and has identified 19 deficiencies in the Authority’s internal controls. The matters covered in this report are limited to those which in the Appointed Auditor’s opinion are of sufficient importance to merit reporting to you in the context of your governance role. None of these matters are deemed to be of significant risk. These issues have already been discussed with the Head of Finance and Delivery.

The Authority has made progress in enhancing its control environment and implementing recommendations raised last year

4. We have also followed up the recommendations raised in the prior year controls report issued in November 2013. We have found that all of the 15 recommendations raised in the prior year have been implemented. None of the outstanding recommendations are deemed to be of significant risk.
5. The matters identified are set out in the table below.

System	No of recommendations in prior year	Implemented*	Not fully implemented	New recommendations	Total
General Ledger	1	1	0	1	1
Fixed Assets	3	3	0	8	8
IT Controls	5	5	0	0	0
Liabilities	3	3	0	2	2
Related party transactions	1	1	0	1	1
Financial Instruments	1	1	0	1	1
Treasury and cash management	0	0	0	2	2
Creditors and payments	0	0	0	1	1
Debtors and income	0	0	0	2	2
Consolidation	1	1	0	0	0
Internal Audit	0	0	0	1	1
Total	15	15	0	19	19

*This includes recommendations that are deemed to have been superseded or no longer applicable

6. This section of our report seeks to inform management of the matters arising from our review of the arrangements in place, and our recommendations for action. It is not intended to provide a complete overview of the financial systems and procedures of the Authority.
7. We reviewed the following systems as part of our interim audit:
 - Investments and borrowing;
 - Treasury and cash management;
 - Income and debtors;
 - Capital expenditure;
 - Purchasing and payables;
 - Payroll;
 - Projects / DLO;
 - Central Transport Unit;
 - Housing rents;
 - Property, Plant and Equipment valuations;
 - Social Services; and
 - Schools consolidation procedures.
8. We met with Internal Audit during the course of our interim audit and have conducted a review of the core financial systems internal audit reports to inform our risk assessment and understanding of these systems. We were able to partially place reliance on the work of Internal Audit with regards to payroll controls.
9. A number of new recommendations have been raised as a result of our interim and final audit work. These recommendations have been detailed below.

Acknowledgements

10. We would like to thank all staff involved for the co-operation and assistance provided to us during the course of our audit work.

Summary report

New recommendations

No	Observation	Implication	Recommendation	Management response
Financial instruments				
1	Review of investment and borrowing transactions We noted that a weekly summary of investment and borrowing transactions is prepared and the closing balance is agreed to the interest register. However, there is no evidence of the summary and reconciliation being reviewed by an officer independent of the preparer.	There is an increased risk that investment and borrowing transactions may not be accurately recorded.	We recommend that evidence of review of the summary and reconciliation is recorded and retained for future reference.	Agreed

No	Observation	Implication	Recommendation	Management response
Property, Plant and Equipment				
2	<p>Consideration of assets not formally revalued during the year</p> <p>The Code of Practice requires that land and buildings are included within the financial statements at fair value. Authority did not perform an assessment of the potential movement in value of land and building assets not formally revalued during the year.</p>	<p>A material movement in the value of land and buildings may not be identified.</p>	<p>For 2014/15 all land and building assets will be formally revalued. However, management should ensure that, in subsequent years, consideration is given to potential changes in the value of assets not formally revalued during the year in question.</p>	<p>For 2014/15 all land and building assets will be formally revalued and a beacon approach of valuation will commence from 2015/16.</p>
3	<p>Downward movements in fair value</p> <p>For four assets the full downward movement in fair value had been posted to the revaluation reserve where there were no previous upward revaluation movements available to be reversed. Negative revaluation reserve balances are not generally permitted; as such these movements should have been posted to the Comprehensive Income and Expenditure Statement.</p>	<p>There is an increased risk of a misstatement of the Council's reserves balances</p>	<p>It is recommended that controls are established to ensure that postings to the revaluation reserve to the extent that there is a balance on the revaluation reserve for that asset to offset the downward movement. Any additional downward valuation should be posted to the Comprehensive Income and Expenditure Statement.</p>	<p>Agreed.</p>

No	Observation	Implication	Recommendation	Management response
4	<p>Discounted cash flow model for council dwellings</p> <p>The cost of loan finance is included within the discounted cash flow model used to value council dwellings. This treatment is considered to be unusual, in the context of similar valuations performed by other organisations.</p>	<p>The value attributed to council dwellings is not comparable with that reported by other organisations.</p>	<p>Consideration should be given to whether including such costs within the discounted cash flow model is the most appropriate treatment.</p>	<p>Agreed - Consideration will be given for 14/15.</p>
5	<p>Guildhall valuation</p> <p>Building works at the Guildhall have resulted in the reconfiguration of a number of rooms. The facilities team are in the process of measuring the rooms to provide new floor plans which will impact the valuer's assessment of the fair value of the property.</p>	<p>The valuation of the Guildhall may be misstated.</p>	<p>Upon completion of the floor plans the Guildhall should be revalued to take account of its new room configuration.</p>	<p>Agreed – Consideration will be given for 14/15. Specifically, this asset will be reviewed following any subsequent changes to the layout of the Guildhall that would impact on the asset valuation.</p>
6	<p>Integrity of valuation working papers</p> <p>The age and obsolescence assumption used in the valuation of one asset (Abergelli Day Centre) had been altered without the valuer's knowledge.</p>	<p>The valuation of land and building assets may be misstated.</p>	<p>It is recommended that the valuer password protects valuation working papers to ensure that the risk unauthorised amendments is minimised.</p>	<p>Agreed - Consideration will be given to the password protection of spreadsheets in the future.</p>

No	Observation	Implication	Recommendation	Management response
7	<p>Review of outputs</p> <p>The valuation of assets included in the statement of accounts is not formally reviewed by an independent member of the valuations team.</p>	<p>Errors in the valuation model may not be identified resulting in assets being reported at the incorrect value.</p>	<p>The work of the valuer should be formally reviewed in order to minimise the risk that any errors remain undetected.</p>	<p>Agreed – Consideration will be given.</p>
8	<p>Heritage assets</p> <p>Heritage assets need to be valued to an extent such that the cost of undertaking such valuations would be commensurate with the benefits to the users of the financial statements. A number of heritage assets, including some buildings, are held in the accounts at a nominal value.</p>	<p>The value of heritage assets may be understated.</p>	<p>Consideration should be given to including heritage assets within the rolling programme of valuing land and building assets as the cost of undertaking such valuations would be relatively low given that specialist knowledge already exists.</p>	<p>Agreed. However, it is noted that the Council does not have the expertise to undertake valuations of a number of Heritage assets, including a wide range of works of art, statues and remains of former buildings. The cost of undertaking such valuations would need to be undertaken by external valuers at a cost which may not be commensurate to the users of the financial statements.</p>

No	Observation	Implication	Recommendation	Management response
9	<p>Infrastructure assets</p> <p>The Code of Practice on Local Authority Accounting is expected to require local authorities to account for their infrastructure assets in the statement of accounts in accordance with the Infrastructure Assets Code from 2016/2017. For older infrastructure assets the authority could not locate or provide supporting documentation to demonstrate ownership.</p>	<p>The Council may not have the information required to ensure compliance.</p>	<p>The Council should consider the requirement of the Infrastructure Asset Code at an early stage to maximise the opportunity to follow up information that is wrong</p>	<p>Agreed.</p>
Liabilities				
10	<p>Insurance provision</p> <p>The split between short term and long term provisions had been made on an estimate based on an analysis of claims and how long they take to settle. No supporting documentation was provided to support the estimates used.</p>	<p>The classification of the insurance provision between short term and long term may be inappropriate.</p>	<p>It is recommendation that an exercise should be completed to analyse the Authority's claims to ensure that the provision is based upon the most up to date information.</p>	<p>A supporting calculation will be provided.</p>

No	Observation	Implication	Recommendation	Management response
11	<p>Early retirement / voluntary redundancy (ER / VR)</p> <p>No formal consideration has been given to whether any teacher related costs needed to be included in the ER/VR accrual in instances where approval has been given in 2013/14 but the departure date was not until 2014/15. The subsequent review undertaken at our request confirmed that no teacher costs should have been accrued in 2013/14.</p>	<p>The ER / VR provision may be misstated.</p>	<p>The requirement to accrue for teacher related costs should be considered in the same way as it is for other Council employees.</p>	<p>The recommendation is accepted and we will ensure that a formal and documented consideration of any teachers ER/VR costs, if applicable, is accrued for.</p>

No	Observation	Implication	Recommendation	Management response
Treasury and cash management				
12	<p>Petty cash reconciliations</p> <p>Reconciliations of petty cash balances are not performed for every account as at 31 March. Reconciliations are performed on an ad hoc basis.</p>	<p>There is a risk that petty cash balances may not be accurately recorded as at 31 March.</p>	<p>Petty cash reconciliations should be performed on a regular basis, including as at 31 March.</p>	<p>The Authority will consider undertaking petty cash reconciliations for relevant accounts on a risk adjusted basis.</p>
13	<p>School bank balances</p> <p>For school bank accounts, differences between the balance as per the bank reconciliation and the bank confirmation were noted because school accounts are shut down before 31 March. Whilst no manual payments could go through the accounts there were automated transactions which were not recorded within the cash books maintained.</p>	<p>The schools bank balance may not be recorded accurately.</p>	<p>All bank reconciliations should be completed as at 31 March of each year.</p>	<p>Agree with recommendation. Control issue more to do with timing than anything else (e.g. availability of bank statements).</p>

No	Observation	Implication	Recommendation	Management response
Related party transactions				
14	<p>Identification of related parties</p> <p>The current process for identifying related parties is reliant on management's knowledge. Whilst the prior year listing of related parties is reviewed, this process is somewhat informal.</p>	<p>The related party transactions, disclosed in the statement of account may not be complete.</p>	<p>A more formal approach for the identification of related parties should be established to ensure that the risk of omission is minimised.</p>	<p>The risk is accepted and a more formal and robust assessment to identify potential related parties will be undertaken.</p>
General Ledger				
15	<p>Journals</p> <p>Individuals within finance can create post and authorise their own journals if they are within their authorisation limits. We note however that there are mitigating controls through the monthly monitoring of budgets and the year-end closure procedures, which would help to identify any journals inappropriately posted.</p>	<p>The lack of segregation of duties may result in the posting of inappropriate journals.</p>	<p>Consideration should be given to implementing a process for reviewing all journals posted to the nominal ledger.</p>	<p>The Authority has considered this recommendation and deems that the journal approval process in place is appropriate. All journal lines above a specific value are sent for approval to more senior staff. For example, an accountancy assistant can post and approve journal lines up to £250k, principal accountants up to £500k, group accountants up to £1m and chief accountant unlimited. The Authority believes that these journal approval limits and monthly budget monitoring and PFM meetings ensures there is financial control and that journals are appropriately posted. Over 7,000 journal lines were approved in</p>

No	Observation	Implication	Recommendation	Management response
				2013/14.
Creditors and payments				
16	<p>Supporting documentation</p> <p>Supporting documentation for three balances that have been tested could not be obtained. It is noted that the Authority was subsequently able to support these balances.</p>	Creditors may be inappropriately recognised or recorded at the wrong value.	It should be ensured that supporting documentation is available for creditor balances	Agreed
Debtors and income				
17	<p>Bad debt write off</p> <p>It was noted that six batches of invoices designated for write off date back to 2012. The value of each of these batches was in excess of £10k. Delays were noted in obtaining the necessary approvals for these write offs to be actioned.</p>	If bad debts are not written off in a timely manner outturn for the year and the debtors balance may be overstated.	It should be ensured that any balances identified for write off should be processed in a timely manner.	The necessary Head of Service and Cabinet Member will be reminded of their responsibilities in this regard
18	<p>Debtors listings</p> <p>A detailed listing of debtors from the estates rents system as at 31 March could not be provided. This is because the system is live and reports cannot be retrospectively created.</p>	The estates rents debtor balances cannot be adequately substantiated.	A report detailing all estates rent debtors at year end should be produced as part of year end procedures	Agreed. New personnel were not aware of this requirement at the time of audit. The estates rental system is alive system so reports must be run on the 31 March – it cannot be created retrospectively.

No	Observation	Implication	Recommendation	Management response
Internal Audit				
19	<p>Internal audit capacity</p> <p>The Internal Audit function consists of staff totalling 11.6 FTE. Approximately 300 days of planned internal audit work for 2013/14 were not delivered due to time spent on special investigations and vacant posts.</p>	<p>The internal audit programme was not fully completed during the year and, as a result control deficiencies may not have been identified.</p>	<p>Consideration should be given to the way in which the work of internal audit is prioritised to focus on high risk areas. Sufficient allowances should be made within the programme to allow for a reasonable level of unplanned work or unplanned absence.</p>	<p>The Internal Audit Section already uses a risk based approach to prioritise work. An exercise was undertaken during 2013/14 to identify the audits which would be deferred due to the loss of productive time. This exercise used a risk based approach and was reported to the Audit Committee.</p> <p>The Annual Audit Plan already includes time for special investigations and contingency – 177 days were included in the 2013/14 Plan for these items. At the time the Plan was prepared, this was felt to be a realistic allowance.</p>

Prior year recommendations

No	Observation	Recommendation	Current Status	Management response
IT Controls				
1	<p>Northgate Council Tax application – administrative access</p> <p>We noted that Security Administrative rights are held by Senior Members of the department. We would not normally expect senior staff to have such administrator rights, as it is not in line with their roles and responsibilities and allows too great a level of access to the system.</p> <p>In addition to the above, we also noted that one administration profile is not being used.</p>	<p>We recommend that the security administration rights for the senior members of the department are removed.</p> <p>Furthermore, we recommend that the unused administration profile is investigated and removed.</p>	<p>Administration rights of senior members of the department have now been removed along with the unused administration profile.</p> <p>This recommendation is therefore closed.</p>	

No	Observation	Recommendation	Current Status	Management response
2	<p>Civica Icon Application – Administrator accounts</p> <p>We noted that the Chief Cashier uses two accounts with administrator rights, one for business as usual activities and another generic account for user administration in both the hosted and local version of the application.</p> <p>In addition, there were several test accounts with administrative rights on the local version of the application.</p>	<p>We recommend that the generic account should be deleted and it should be ensured that only the named Chief Cashier account is used.</p> <p>We recommend that only one account is used for test purposes and all other test accounts are deleted.</p>	<p>Only the named Chief Cashier account is used in both hosted and local versions of the system</p> <p>Only one account is used for test purposes.</p> <p>This recommendation is therefore closed.</p>	-
3	<p>Terminated access rights Active Directory</p> <p>Four accounts were identified which were not deleted following the user leaving employment at the Authority. It was not possible to obtain the last log on date for these leavers.</p> <p>However, we did not identify any exceptions with leavers for the specific applications we tested. This reduces the risk associated with this finding as although the account could be used for accessing the Council's IT system, it could not be used for accessing specific software applications.</p>	<p>We recommend that these accounts be investigated and disabled as soon as possible and that procedures are put in place to ensure that when an employee leaves the Authority the accounts are identified and disabled on a timely basis.</p>	<p>There is a leavers process whereby monthly a leavers report is run from ISIS and compared against the active directory and disabled/deleted as appropriate. The 4 anomalies that were identified at the time were investigated and have been disabled.</p> <p>This recommendation is therefore closed.</p>	

No	Observation	Recommendation	Current Status	Management response
4	<p>Recertification's of user accounts</p> <p>Civica Icon – we noted that recertification is only performed over the cashier accounts and not over all accounts within the hosted and the local version of the application.</p> <p>Axise – we noted that no recertification of user accounts is completed for this system.</p>	<p>Civica Icon - a user account review should be performed, with all accounts within the application being reviewed and recertified for use. This would ensure that only valid accounts with appropriate access rights exist within the application.</p> <p>Axise - a user access review should be carried out at least annually in order to obtain comfort that the user accounts, rights and segregation of duties within the application are appropriate.</p>	<p>An annual e-mail to is sent to sections requesting notification of any leavers.</p> <p>This was completed in October 2013 and November 2014</p> <p>This recommendation is therefore closed.</p>	
5	<p>Access requests for the Civica Icon application</p> <p>It is noted that access requests to the application are received from a new starters line manager. However the application administrator does not maintain evidence of these requests.</p>	<p>As requests are received via email, we recommend that the user access requests are saved to a separate archive folder and that the super users' authorisation emails are also stored in an email archive for audit trail purposes.</p>	<p>From our walkthrough of the process it is noted that access requests are retained in order to ensure an audit trail is in place</p> <p>This recommendation is therefore closed.</p>	-

No	Observation	Recommendation	Current Status	Management response
General Ledger				
6	<p>Internal charges</p> <p>From our work on the Comprehensive Income and Expenditure Statement we noted that gross income and gross expenditure figures for Highways and Transportation were not presented net of internal recharges in the Statement of Accounts.</p> <p>This is due to the failure to utilise the discrete ledger codes which are being maintained specifically for internal recharges.</p>	<p>We recommend that staff are reminded of the importance of ensuring that recharges are maintained on discrete ledger codes to ensure that they can be properly identified and correctly adjusted for during the accounts preparation process.</p>	<p>From our work on the Comprehensive Income and Expenditure Statement for 2013/14 we did not identify any instances of “grossing up” of transactions.</p> <p>This recommendation is therefore closed</p>	-
Liabilities				
7	<p>Provision for debtors in dispute</p> <p>From our work on accounts receivable we noted exceptions where the debtor balance was in dispute or not fully agreed as at the balance sheet date. It was ascertained that the service department consider it is unlikely that these balances will be collected or recovered post year end. Therefore, an assessment of the requirement for a write off or provision should have been undertaken.</p>	<p>A review of debtors should take place to ensure that any debts which are unlikely to be collected are provided. Further processes should be put in place to ensure that individual departments communicate such instances to the finance department on a timely basis.</p>	<p>From our testing of accounts receivable in 2013/14 we did not note any instances where the balance was in dispute.</p> <p>This recommendation is therefore closed.</p>	-

No	Observation	Recommendation	Current Status	Management response
8	<p>Interest classification</p> <p>In our testing of financial liabilities, we identified that all of the accrued interest to be paid on borrowing had been included in the long term borrowing balance.</p> <p>As interest will be paid within the next 12 months it is appropriate to include it as a current liability (i.e. within short term borrowing).</p>	<p>The year-end borrowing balance should be reviewed to determine the amount relating to accrued interest. This should then be reclassified to short term borrowing.</p>	<p>No issues were noted with regard to the classification of accrued interest.</p> <p>This recommendation is therefore closed.</p>	

No	Observation	Recommendation	Current Status	Management response
9	<p>Equal pay: review of data</p> <p>During our work performed in respect of the equal pay provision we noted inconsistencies in the information received from the Finance, Legal and Job Evaluation teams.</p> <p>This resulted in a difference in number of claimants per the list maintained by the legal team and the list used to calculate the provision. Such differences occur as a result of a number of individuals who had negotiated a COT3 settlement and so are not eligible to claim prior to 31 March 2010. These individuals were incorrectly included within the equal pay provision calculation and the impact of this was an overstatement of the provision by £533k.</p> <p>There were also individuals who were included on the list from Legal and not included in the provision. The impact of this difference was estimated as an understatement of the provision by £370k.</p> <p>This was subsequently amended by the finance team as noted in the control point above.</p> <p>In relation to those individuals who have put in a claim but the Council have found no record the employee and average claim amount was applied to these individuals. This calculation was not updated on receipt of the revised model by the finance team.</p>	<p>We recommend that the Council undertakes a rigorous review of the underlying data supporting the equal pay provision.</p> <p>This will need to be performed with the involvement of a number of the Council's teams, e.g. HR, Legal, Finance and the Job Evaluation teams.</p>	<p>The Authority has undertaken a substantial review of the claims that it has received and significant progress has been made.</p> <p>Although we note that a small number of claims remain outstanding in which underlying changes in assumptions could change the value of the claim, it is recognised the majority of claims have been agreed and settled.</p> <p>The Authority has put in place a process, involving appropriate officers from finance and internal audit, which reduces the risk of claims being settled at the wrong value.</p> <p>This recommendation is therefore closed.</p>	

No	Observation	Recommendation	Current Status	Management response
Financial Instruments				
10	<p>Classification of financial instruments</p> <p>The financial instrument note in the draft Statement of Accounts did not fully reconcile to the primary statements. This is in part due to including cash and cash equivalent balances within investments in the financial instrument note.</p>	<p>The CIPFA Code of Practice should be reviewed to ensure that the disclosure requirements for the reporting of financial instruments is met. Additionally, the presentation of the note should be reviewed to ensure that it can be used by the reader of the Statement of Accounts to understand fully how the Council has used financial instruments in managing its balance sheet.</p>	<p>From our work on the financial instruments note in 2013/14 was produced in a manner which was largely compliant with the CIPFA Code of Practice.</p> <p>This recommendation is therefore closed.</p>	-
Fixed assets				
11	<p>Guildhall valuation</p> <p>The Guildhall has not been formally revalued in the past 5 years. Instead the asset has been valued by way of the application of an index however it is unlikely that the valuation is materially misstated.</p>	<p>The Guildhall should be formally valued during 2013/14 to ensure that it is being recognised at an appropriate value.</p>	<p>It is noted that the Guildhall was formally valued during 2013/14.</p> <p>This recommendation is therefore closed.</p>	-

No	Observation	Recommendation	Current Status	Management response
12	<p>Valuation of heritage assets</p> <p>During our review of heritage assets, we found that several insurance valuations had been commissioned in 2012 in order to assign a value to these assets.</p> <p>However, several older valuations were used to bring these items onto the balance sheet in 2011/12.</p> <p>Further, there are additional heritage assets, which could be valued. The fact that a value for these assets was not included in the balance sheets was disclosed in the accounts.</p>	<p>The Authority needs to ensure that there are processes in place going forwards to keep the valuation of heritage assets up to date. This could include adding heritage assets to the rolling programme of asset valuations, and an annual consideration of valuation methods for each class of asset. In addition, the Authority will need to ensure an annual impairment assessment is undertaken.</p>	<p>This recommendation has been superseded by recommendation 8 in appendix 1 above</p>	-
13	<p>Calculation of the capital financing requirement</p> <p>During our review of the calculation of the capital financing requirement (CFR), we were unable to reconcile the opening CFR balance to the closing balance sheet for the prior year.</p> <p>It was identified by the Authority that there was an issue in the prior year with the double counting of fixed asset additions, and the inclusion of items which were not strictly additions to the underlying financing requirement, but rather reclassifications.</p>	<p>Going forwards, the Authority should ensure when calculating the CFR that it only includes the impact of genuine additions to the fixed asset balance, and not items which are merely reclassifications.</p>	<p>No issues were noted with regards to the CFR calculation in 2013/14</p>	-

No	Observation	Recommendation	Current Status	Management response
Consolidation				
14	<p>Consolidation</p> <p>From our work on consolidation it was noted that accounts for its subsidiary, the Swansea City Waste Disposal Company (LAWDC), had not been received despite officers repeatedly requesting the information from the company. Therefore, the Authority was required to make a series of assumptions based on limited information in order to prepare the group accounts.</p>	<p>The Authority should ensure that appropriate financial information is obtained in order to enable the Authority to fulfil its obligations to produce group accounts and to enable the effective management of its interest in the company.</p>	<p>In 2013/14 financial information was obtained for LAWDC which was used to demonstrate that the consolidating entries would not be material. However, no information was obtained in order to allow consolidating entries to be accurately calculated.</p> <p>It is noted that the assets and liabilities of LAWDC have been transferred to the Authority; as such the company is no longer trading or operating.</p> <p>As it is expected that the consolidating entries for 2014/15 will be minimal, this recommendation is closed.</p>	-

No	Observation	Recommendation	Current Status	Management response
Related party transactions				
15	<p>Declarations of Interest</p> <p>Declarations of interest are disclosed on the Authority's website. These are updated directly by both members and senior staff. A number of these profiles have not been updated for several years.</p>	<p>The Authority should ensure a robust process is in place to capturing members and senior management's declared interests. This would aid public scrutiny and transparency and governance. It could be used to inform judgements on whether additional related parties disclosures are required within the financial statements.</p>	<p>From our work on declarations of interest, we noted no issues with regards to completeness. This recommendation is therefore closed.</p>	-

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