

Plymouth City Council

Annual Audit Letter 2009-10

20 October 2010

Final

Contents

1	Introduction and Key Messages	1
2	Audit of Accounts	3
3	Use of Resources	7
4	Closing Remarks	13
App	pendices	
A	Reports Issued	14
В	Audit and Other Fees	15

1 Introduction and Key Messages

Purpose of this Letter

1.1 This Annual Audit Letter (Letter) summarises the key issues arising from the work that we have carried out at Plymouth City Council (the Council) during our 2009-10 audit. The Letter is designed to communicate our key messages to the Council and external stakeholders, including members of the public. The letter will be published on the Audit Commission's website at www.audit-commission.gov.uk and also on the Council's website.

Responsibilities of the external auditors and the Council

- 1.2 This Letter has been prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission (www.audit-commission.gov.uk).
- 1.3 We have been appointed as the Council's independent external auditor by the Audit Commission, the body responsible for appointing external auditors to local public bodies in England. As external auditors, we have a broad remit covering finance and governance matters.
- 1.4 Our annual work programme is set in accordance with the Code of Audit Practice (the Code) issued by the Audit Commission and includes nationally prescribed and locally determined work. Our work considers the Council's key risks, when reaching our Code conclusions.
- 1.5 It is the responsibility of the Council to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Council is fulfilling these responsibilities.

What this Letter covers

- 1.6 This Letter covers our 2009-10 Code audit, including key messages and conclusions from our work on:
 - auditing the 2009-10 year end accounts (Section 2);
 - certifying that grant claims and returns to various government departments and other agencies are fairly stated and in accordance with terms and conditions (Section 2); and
 - assessing the Council's arrangements for securing economy, efficiency and effectiveness in the use of its resources, including specific reviews in response to locally identified risks and issues (Section 3).
- 1.7 A list of all the reports issued during the year is provided at Appendix A whilst Appendix B sets out our actual and budgeted fees for 2009-10.

The Economy

- 1.8 In the current financial climate, the Government's most urgent priority is to reduce the deficit whilst ensuring the economic recovery continues. Savings of over £6 billion are planned from Government spending during this financial year, including some £1.1 billion in reduced grants to local government. At the same time, the Government aims to reduce top-down government and devolve power and greater financial autonomy to local authorities by a range of measures including:
 - abolishing Comprehensive Area Assessment;
 - reducing ring-fenced central government grants; and
 - undertaking a full review of local government finance.
- 1.9 Council tax in England is also to be frozen for at least one year, with a possible freeze for a second year in partnership with local authorities.
- 1.10 This Annual Audit Letter has been written in the context of the significant change agenda in which the Council is operating, including the ongoing increase in demand for social care, the delivery of an ambitious capital programme and the need to generate cash releasing efficiency savings of some £14 million in 2010-11, against a backdrop of expected further significant reductions in revenue and capital funding.

Key areas for Council action

- 1.11 We have set out below, the key areas where action should be taken by the Council to further improve its arrangements during 2010-11:
 - The Council has identified that some £14 million of savings are required in 2010-11. The latest financial position for the year to September 2010 shows a shortfall in the cost improvement plans and overspending in directorate budgets which amount to a £3.3 million overspend against the net revenue budget. The Council needs to en sure that action is taken to get the planned efficiency savings back on track and address the underlying reasons which creating the directorate overspends.
 - As the Council implements a range of changes in the way that it delivers its services and manages its support functions, it needs to ensure that it effectively evaluates how the projects have been managed and that the planned benefits have been realised. Further, it needs to ensure that the experience from each project is shared across directorates to ensure that key issues and lessons are identified to improve the effectiveness of future projects.
 - As the financial environment becomes increasingly challenging, the Council needs
 to ensure that it is maximising the opportunities of working more effectively with its
 partners. It has a good track record within individual areas where strong
 partnership arrangements have been developed and, moving forward, these need to
 be replicated across all relevant service to ensure that scarce resources are
 maximised and services delivered in the most efficient and effective way.
- 1.12 The context for these key messages can be found in this Letter. Management has agreed to the implementation of these recommendations.

2 Audit of Accounts

Introduction

- 2.1 We issued an unqualified opinion on the Council's 2009-10 accounts on 24 September 2010, ahead of the statutory certification deadline. Our opinion confirms that the accounts give a true and fair view of Council's financial affairs at 31 March 2010 and of its income and expenditure for the year.
- 2.2 Prior to giving our opinion on the accounts, we are required to report significant matters arising from the audit to those charged with governance (defined as the Audit Committee at the Council). We presented our Annual Report to those Charged with Governance to the Audit Committee on 24 September 2010 and summarise only the key messages in this Letter.

Audit of the accounts

- 2.3 The Council performed well in producing a timely set of accounts against a tight timetable. We were presented with the draft financial statements at the Audit Committee on 28 June 2010. The working papers produced to support the accounts were of a high standard and provided within the timescale we agreed in advance and the finance staff dealt with the queries arising from our audit in a timely and efficient manner. In particular, we were pleased that the Council had implemented our recommendations from previous years and incorporated the key lessons from previous audits within the closedown guidance issued to all directorates.
- 2.4 Our audit work concluded that the Council had taken appropriate action to address or adequately mitigate all of the key accounts risks identified in our Financial Statements Audit Plan, that was presented to the Audit Committee on the 26 March 2010. In particular:
 - the accounting treatment for the PFI scheme were consistent with the requirements set out in the SORP and IFRIC12;
 - the disposal of the councils housing stock through an LSVT and the sale of its shareholding in Plymouth Citybus were appropriately accounted for and disclosed in the financial statements;
 - the changes introduced by the 2009 SORP were correctly incorporated into the accounts; and
 - the review and impairment of the Council's investment in Icelandic Banks was appropriately documented and reflected in the financial statements, with full use being made of the capitalisation direction.
- 2.5 Our audit identified a small number of areas where additional disclosures were required to be reflected within the statement of accounts, but none of these impacted upon the final reported out-turn position. Specifically, the Council provided an explanation within their Post Balance Sheet Event note, of the impact of the change in the future pension liabilities arising from the Governments announcement to base future increases in pensions on the Consumers Price Index (CPI) as opposed to the Retail Price Index (RPI) which has been

- used previously. At the Balance Sheet date, this would decrease the value of the net pension liability by 8.6% to £410.5 million.
- 2.6 The Council also clarified the profit arising from the sale of Plymouth Citybus within the Income and Expenditure account by disclosing the £17.5m as a "Gain on the sale of a subsidiary" instead of including it within the "Other income" heading.
- 2.7 There was one audit adjustment that the Council did not process through the accounts on the grounds of materiality, which we were satisfied to accept. This related to a decrease in the valuation of unfunded liabilities for the teachers' pension scheme of £1.66 million. The Council accepted that its arrangements for seeking a regular valuation of this liability needed to be improved and has now implemented enhanced procedures. Set against a total pension liability of over £410 million, we accepted that the adjustment did not need to be processed.
- 2.8 Our audit also highlighted the need for all elected members to complete an annual declaration of material transactions with related parties. Five members did not respond to the annual declaration and we were required to undertake additional procedures to satisfy ourselves that there were no material transactions that would impact upon our opinion. The Council have responded positively to our comments in this area and is further strengthening its arrangements to ensure that all elected members comply with this requirement in future years.

Financial performance

- 2.9 The Council reported a £1.5m revenue surplus at 31 March 2010 and set a balanced budget for 2010-11 and for the period of the current Medium Term Financial Strategy (MTFS). Whilst there was a revenue overspend of £1.2m at the year end, due to an overspend in adult social care as a result of an increase in both number and complexity of cases and in children's services following additional referrals, this was offset by a refund from HMRC of overpaid VAT of £2.1m and additional funding through specific grants that had not been anticipated.
- 2.10 At the end of the financial year, the General fund reserve was some £11.5.m, representing 5.7% of the net revenue budget and at the level determined as being the minimum prudent required by the Council. This out-turn reflects the tight financial control that the Council has exercised over the last year with strong financial management arrangements in place to identify and address areas of overspending at an early stage.
- 2.11 The Council's financial position remains extremely challenging as it seeks to remain in financial balance whilst facing significant cost pressures impacting across local government. The latest budget monitoring report (September 2010) shows that the overall Income and Expenditure forecast is a deficit of £3.3m at the end of the financial year. The Council's budget remains under considerable pressure, particularly in children's services with increased placement numbers and higher than planned use of high cost residential provision and community services where adult social care costs, mainly relating to learning disability services, is overspending.
- 2.12 Additional pressures are being introduced through in-year Government announcements where specific grants and funding are either being reduced or withdrawn completely. The Council currently estimates that the impact of this is some £4m to date, in addition to the pressures already being experienced in directorate budgets.
- 2.13 The scale of the challenge faced has been recognised by Members. The Cabinet and members of the Council are kept upto date through regular Joint Performance and Finance reports, which continue to be enhanced to provide relevant and timely information. Theses

monitoring reports summarise the key issues and risks facing the Council and provide a risk assessed position for each of the directorate delivery plans which detail the planned areas of cost savings. We will continue to keep the Council's financial position under review as part of our 2010-11 audit.

Financial systems

- 2.14 We undertake sufficient work on key financial controls for the purpose of designing our programme of work for the financial statements audit. Our evaluation of the Council's key financial control systems did not identify any control issues that presented a material risk to the accuracy of the financial statements.
- 2.15 We reviewed the work of internal audit and concluded that the scope and conduct of internal audit work was appropriate to support our work in auditing the Council's 2009-10 accounts. We also performed a high level review of the general IT control environment as part of the overall review of the internal control system and concluded that there were no material weaknesses within the IT arrangements that would adversely impact our audit of the accounts.
- 2.16 We have made a number of recommendations where the Council could further enhance its arrangements and these are being acted upon by appropriate officers. In particular, the Council needs to demonstrate that it is realizing the benefits that it planned to achieve through the introduction of the new shared internal audit service across the three councils of Devon, Plymouth and Torbay and that the partnership is working effectively.

Annual Governance Statement

2.17 We examined the Council's arrangements and process for compiling the Annual Governance Statement (AGS). In addition, we read the AGS and considered whether the statement was in accordance with our knowledge of the Council. Our work confirmed that the AGS was consistent with our knowledge of the Council and no issues arose from our work.

Other issues

- 2.18 We have also completed our audit of the Council's Whole of Government Accounts submission. This is the first year that the submission will be used to produce published whole of government accounts. Our review only identified a small number of areas where amendments to the submission were required and these were processed and the audited return was submitted within the timescales prescribed.
- 2.19 We did not receive any questions from member s of the public nor were we required to undertake any additional audit procedures other than those originally planned in relation to our audit of the financial statements.

International Financial Reporting Standards

2.20 The Council is required to prepare its accounts in accordance with International Financial Reporting Standards (IFRS) from 2010-11. The IFRS transition at the Council is being led by a dedicated project team and a project plan is in place.

2.21 Our audit confirmed that the Council has undertaken a significant amount of work in their preparations for transition but they had yet to restate their 2009-10 opening balances. We recognise that the Council has engaged a wide range of specialists outside of the finance function, including the property services team to assess property assets and leases held by the Council. Moving forward, the Council now needs to ensure that its overall project plan remains on track with progress against the key milestones being closely monitored. We will continue to review progress as part of our planned programme of work for 2010-11.

Certification of Claims and Returns

- 2.22 Each year we review and certify a number of grant claims and returns in accordance with the arrangements put in place by the Audit Commission. The Council has good overall arrangements in place and we continue to work with the Council to identify opportunities where further improvements could be made.
- 2.23 This year we are required to certify 9 claims and returns, representing income and expenditure of over £200 million. We will be reporting the key messages arising from our certification of these grant claims and returns in January 2011, when our work has been completed.
- 2.24 Our report of the findings from our certification work last year (2008-09 claims) identified that there was scope for the Council to introduce improved arrangements in the following areas:
 - our review of the housing and council tax benefit return identified a high proportion of errors in the assessment of cases included within the claim and unreconciled items in the underlying benefit (Academy) system; and
 - ensuring that an accurate record of assets is maintained where these are funded through grant monies.
- 2.25 We will assess and report the progress made to address these areas as part of 2009-10 grant certification report.

3 Use of Resources

Introduction

- 3.1 We issued our annual VFM conclusion on 24 September 2010, at the same time as our accounts opinion, and ahead of the required deadline. We concluded that, for 2009-10, the Council made proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ending 31 March 2010.
- 3.2 Prior to giving our VFM conclusion, we set out the basis of this conclusion and the results of our assessment against the use of resources framework, in our report presented to the Audit Committee on 24 September 2010. In this Letter, we summarise the key messages from this work alongside relevant findings.

2009-10 VFM conclusion and UoR assessment

- 3.3 The Audit Commission's Code of Audit Practice requires us to assess whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. In discharging this responsibility, we are required to review and, where appropriate, examine evidence that is relevant to the Council's corporate performance management and financial management arrangements.
- 3.4 Our 2010 Value for Money conclusion has been informed by work carried out on Use of Resources up until the abolition of Comprehensive Area Assessment, and other local risk based work carried out in accordance with our 2009-10 Audit Plan.

Use of Resources Assessment

- 3.5 We have assessed the progress made by the Council in implementing the recommendations that we made following of review of the Council's arrangements against the criteria previously specified by the Audit Commission. This identified that the Council had implemented a range of improved arrangements that were producing some strong, demonstrable outcomes.
- 3.6 The key developments in the Council's arrangements include:
 - a significant and improved stakeholder consultation process with a network being established with key representatives from all key directorates to enhance community engagement;
 - benchmarking has identified that value for money has been achieved in a number of directorates with action plans developed to drive further improvements;
 - arrangements for producing relevant and reliable data to support decision making and manage performance have been improved, with a significant improvement in the quality of data relating to revenue and benefits;
 - there is evidence of strong risk management processes in place with some significant projects being managed with effective consideration and monitoring of risks; and
 - the joint provision and co-location of teams with major partners are being actively
 pursued with some good examples of partnership working within the adult social
 care and PCT teams.

- 3.7 Whilst there has been strong progress made, there remains a number of areas where further focus would produce improved outcomes. We have considered those areas where the Council should seek further improvement against the new value for money criteria determined by the Audit Commission of securing financial resilience and prioritising resources within tighter budgets. In particular, the Council should:
 - further develop its understanding and identify opportunities where it might share resources with key partners to maximise value for money and ensure that resources are used effectively to drive local improvement targets;
 - collect data on the use of natural resources across all significant buildings that it utilises to ensure it has a sound understanding of the resource use and clear targets to manage and reduce this, wherever possible; and
 - ensure that there is a robust process in place to clearly identify the skills gaps across
 departments, develop workforce development plans which align to departmental
 and corporate business plans and implement action plans to address any gaps.

Use of Resources reviews

- 3.8 To support our assessment of the Council's use of resources, we have completed four specific reviews to address locally identified risks and developments:
 - Performance Management Arrangements;
 - Arrangements for Complying with Age-related Equalities legislation;
 - Joint Strategic Needs Assessment; and
 - Corporate Restructuring.
- 3.9 The key issues from these reports are summarised within this Letter. We have provided and discussed our more detailed reports with management.

Performance Management Arrangements

- 3.10 Sound performance management and reporting arrangements are integral to the proper management of an organisation and are an essential contribution to ensuring the proper use of resources and the achievement of objectives. The integrity, reliability and timeliness of the information which underpins an effective performance management system is fundamental if it is to inform decision making, business planning, budget setting and strategic development.
- 3.11 Our review recognised the significant effort that had been made across the Council in developing its performance management arrangements and we identified a number of positive aspects to the local arrangements for monitoring and reporting progress against corporate priorities.
- 3.12 The key areas where we considered that the Council could focus further improvement related to:
 - the clarity of different roles in relation to performance management that were being undertaken corporately and within service departments; and
 - developing a clearer relationship between financial and performance reporting to demonstrate how additional investment or changes in funding had impacted on service outcomes.
- 3.13 We are pleased to note that since our report was issued in March 2010, good progress has been made against our recommendations.

Arrangements for Complying with Age-related Equalities Legislation

- 3.14 The Employment Equality (Age) Regulations have made it unlawful for employers to discriminate against workers, employees, job seekers and trainees on the grounds of their age. These requirements completed the existing legislation which covered discrimination on the grounds of sex, race, disability, sexual orientation, gender realignment and religion or belief. Our review assessed the arrangements that the Council had put in place and how it had minimised risks through effective internal controls.
- 3.15 Our overall conclusion was that the Council had sound arrangements in place for ensuring equality and diversity across its workforce and in its dealings with the public through appropriate policies, processes and infrastructure. Whilst we did not identify any significant recommendations to further improve its arrangements, we considered that a review by the Councils own HR function of the impact of current and emerging legislation on the existing workforce would produce some valuable information for future resource planning.

Joint Strategic Needs Assessment

- 3.16 Sine 1 April 2008, local authorities and PCTs have had a statutory duty to produce a Joint Strategic Needs Assessment (JSNA) which should be used to inform the Local Area Agreements and Sustainable Communities Strategies as well as the operational plans for both types of organisations. The JSNA is intended to provide 'the big picture' in terms of the health and well-being needs, together with the identified inequalities, within the local population.
- 3.17 Our review assessed how well the Council and PCT had worked together to develop their JSNA considering the effectiveness of their partnership working, their engagement with the local communities to develop a full understanding of needs and quality of the underlying evidence used to inform the assessment.
- 3.18 We found that the a considerable amount of effort has been invested in developing the JSNA which is underpinned by ten key domains, e.g. life style; physical health and wellbeing, mortality and life expectancy; each of which are supported by a report that provides a detailed perspective of the key issues and challenges. Our review confirmed that the development is still 'work in progress' and that, moving forward, the Council needs to translate the intentions of the JSNA into a wide range of actions within service plans, supported by key targets and measures that partners will be able to use to monitor progress.
- 3.19 Since our review was completed, the coalition government have announced significant changes to the way that health services are to be managed and delivered. Consequently, the Council, with its partners, need to review and further refine their JSNA to ensure that it reflects the new arrangements, as these become clearer, and is able to respond to any new or emerging challenges.

Corporate Restructuring

- 3.20 Over the last two years the Council has undertaken a significant corporate restructuring, redefining the role of individual directorates and rationalising other corporate roles. This project was set against the context of the significant change and improvement in the Council's performance over recent years and the need to structure itself in order to continue its transformation as a strongly performing Council.
- 3.21 Our review recognised that any such restructuring brought with it inherent risks that would need to be managed effectively if the process was to run effectively and the delivery of high quality services during the period change were to be maintained.

3.22 We concluded that the restructuring project was managed effectively with no detrimental impact upon service performance. As the Council concludes the process, it recognises that it needs to demonstrate that the original planned benefits have been realised and that efficiency savings have been delivered.

Overall Value for Money Conclusion

3.23 On the basis of the work completed, we issued an unqualified Value for Money conclusion.

Follow-up of Previous Reports

- 3.24 As part of our planned programme of work for 2009-10, we followed up progress made by the Council in implementing outstanding recommendations from current and previous years' audit reports.
- 3.25 Our audit of the statement of accounts and the underlying control environment confirmed that all of the issues identified in previous years had been acted upon. The recommendations arising from our audit this year principally arose from new developments, such the implementation of IFRS, or changes in the Councils arrangements, such as the introduction of a new Internal Audit Partnership across the three largest Councils within Devon. As such, we will continue to work with the Council to monitor the progress made against the areas for improvement identified and raise further recommendations, where appropriate.
- 3.26 We have also completed follow up audits of our 2008-09 reviews relating to the Council's customer access and partnership arrangements. Our work indicates that good progress has been made in addressing the areas we identified as requiring improvement.

Customer Access Arrangements

3.27 At the time of our original review the Council was already engaged in a great deal of development work on customer access arrangements. This work has now become part of the wider business transformation plan which involves the effective alignment of accommodation, people and ICT. Significant progress has been made against our original recommendations and the Council now needs to focus on ensuring that the planned outcomes are being delivered and are improving the overall customer experience.

Partnership Arrangements

- 3.28 Our review found that good progress had been made against the majority of our recommendations. The Council has developed a comprehensive guide to managing partnerships and specific guidance in relation to risk management within partnerships. However, at the date of our review, this guidance had not been formally or approved or disseminated to officers to use. We also identified that strong corporate governance arrangements were in place for significant partnerships, but that they were less clear for other partnerships.
- 3.29 Moving forward, we have made further recommendations to enhance the Council's partnership arrangements, with specific emphasis on ensuring the partnership agreements, risk registers and data/information sharing protocols being put in place for all partnerships in order that the success and impact of the partnership can be readily measured and monitored.

Review of disposal of Plymouth Citybus

3.30 In addition to the specific work that we have completed to inform our use of resources conclusion, we undertook a specific review of the council's processes and arrangements in the disposal of its 100% shareholding in Plymouth Citybus.

- 3.31 On the 30 November 2009 the Council approved the sale to Go Ahead Holding Ltd. During the lead up to the sale, the Council kept us fully informed and we were satisfied that adequate arrangements were being maintained throughout the process. However, due to the scale, significance and wide interest in the project, we agreed that we would undertake a detailed post-project review to identify the key issues and areas where lessons could be learnt for future major projects. In addition, our review considered the range of issues raised by interested parties and members of the public.
- 3.32 Overall, we concluded that the project was managed well and delivered a successful outcome in the terms expected by the Council. It was a commercially sensitive project where confidentiality and speed were critical if the value to be obtained from the sale was to be maximised.
- 3.33 We found that the project manager exercised strong project management skills and supplemented the experience available within the Council with external advisors to provide specialist advice. The project was successfully completed within a six month timescale, avoided the unauthorised release of confidential information and provided decision makers with sufficient information to make a informed decisions.
- 3.34 Our review identified that a detailed project risk register had been developed and updated throughout the project with significant risks being managed and appropriate mitigating actions being taken, when necessary. The Council had sound arrangements in place to demonstrate that value for money was achieved both at the initial and with regard to any future developments, such as the future re-development of the depot site should that become possible. The governance arrangements put in place for the project were appropriate with regular scrutiny throughout the process by leading officers, members of the project board and elected members. Officers also ensured that, as the external auditors, we were provided with regular updates as the project progressed and at key milestones.
- 3.35 Our review did identify a number of areas where the Council could further enhance its arrangements for the delivery of major projects although we recognised that, to an extent, some of these arose as a result of the nature and approach adopted by the Council. These improvements were summarised under the following key themes:
 - ensure that there is effective transparency in the decision making arrangements with a robust challenge to ensure there is an appropriate balance between maintaining the confidentiality of information and providing sufficient information to facilitate a well informed decision;
 - develop robust arrangements to monitor and report progress against project plans and financial reporting against budget; and
 - enhance the documentation within the risk management arrangements ensuring that any risks which impact upon the corporate improvement priorities are considered for inclusion on the strategic risk register.
- 3.36 The Council has considered our report and accepted the recommendations made to inform future major projects.

Approach to local value for money audit work from 2010-11

3.37 The Audit Commission has reviewed its work programme for 2010-11 onwards given the scale of the pressures facing public bodies in the current economic climate. As part of this exercise, the Commission has been discussing possible options for a new approach to local value for money audit work with key national stakeholders.

- 3.38 From 2010-11 we will apply a new, more targeted and better value approach to our local VFM audit work. This will be based on a reduced number of reporting criteria specified by the Audit Commission, concentrating on:
 - securing financial resilience
 - prioritising resources within tighter budgets.
- 3.39 We will determine a local programme of VFM audit work based on our audit risk assessment, informed by these criteria and our statutory responsibilities. We will no longer make annual scored judgements relating to our local VFM audit work. Instead we will report the results of all the local VFM audit work and the key messages for the audited body in our annual report to those charged with governance and in the annual audit letter.

4 Closing Remarks

- 4.1 This Letter was discussed and agreed with the Chief Executive and Director for Corporate Support and presented to the Audit Committee on 15 November 2010.
- 4.2 We would like to take this opportunity to express our appreciation for the assistance and cooperation provided during the course of the audit.

Grant Thornton UK LLP 20 October 2010

A Reports Issued

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Report	Date Issued
Audit Fee Letter	March 2009
Financial Statements Plan	March 2010
Review of Plymouth Citybus	February 2010
Review of Performance Management Arrangements	March 2010
Review of Arrangements for Complying with Age Related Equalities Legislation	April 2010
Interim Audit Report	April 2010
Follow Up: Customer Access Arrangements	August 2010
Annual Report to those Charged with Governance	September 2010
Follow Up: Partnership Arrangements	September 2010
Review of Joint Strategic Needs Assessment	September 2010
Review of Corporate Restructuring	September 2010
Value for Money Conclusion	September 2010
Annual Audit Letter	October 2010
Certification Report 2009-10 (Planned)	December 2010

B Audit and Other Fees

Audit Area	D., d., a. 2000 40	A 1 2000 10
	£	t.
Financial statements (inc WGA)	208,614	208,614
VFM conclusion / Use of	110,827	110,827
resources		
Total Code of Practice fee	319,441	319,441
Additional work in relation to Plymouth Citybus	-	19,388
Certification of grant claims and	80,000	70,000
returns		(current estimate)
Total fees	399,441	408,829



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