

# Appointing your external auditor

10

Next steps for local government bodies November 2016



## Time to make a choice



### Local authorities now have the power to appoint their external auditor themselves

- This appointment will apply from the audit of the 2018/19 financial year
- Government regulations require that the appointment is made by 31 December 2017



### Before deciding who the auditor should be, you need to decide how you want to make that decision

- There are a number of options for making this decision
- This includes deciding to pass that responsibility to a sector-led body



#### There are certain requirements you must follow

- Specific requirements apply should you run your own tender process
- There are also other requirements which apply to all approaches

This paper summarises the key considerations for local government bodies when deciding on your preferred route to appointing your auditor



# A brief recap

Historically, auditors have been appointed by the Audit Commission, which closed on 31 March 2015

The Audit Commission's contracts continue under transitional arrangements managed by Public Sector Audit Appointments Ltd (PSAA)

For local authorities, the current PSAA contracts expire upon the conclusion of the 2017/18 audit year



Local government bodies therefore have, for the first time, the ability to appoint their own auditors



f.

Your first key decision is therefore what procurement strategy to follow



# Procurement options

#### There are four main options available on how you can appoint your external auditor

A short term option if you want to continue with your current auditor	Stand-alone tender			
	Tendering for your audit service as a stand-alone contract	Combined tender		
		Collaborative procurement with one or more other authorities	Sector led Opting into national collaborative	
			procurement by a third party	

The pros and cons of each are considered in the next few pages, although it is important to note that these are generic views as the circumstances and priorities of individual organisations will vary

While there are a number of important considerations for authorities, this is essentially about choice – how much freedom do you want to have over the appointment of your external auditor?



# Option 1 - Roll forward incumbent auditor

### What does this involve?

#### Pros

#### Cons

#### Points to note

- Engaging your current auditor directly for a short period
- A short-term option for say one or two years prior to subsequent market testing
- A clear business case should be developed setting out the rationale for following this approach

- Provides short term continuity of audit service
- Particularly useful if your auditor is currently dealing with complex issues (e.g. elector challenge, investigations etc.)
- Allows for future tendering in a more settled and mature market (i.e. avoiding the initial 'rush' of tendering activity in first year of new arrangements)

- Delays market testing through a competitive process
- May limit opportunity to follow collaborative tendering (option 3) if potential partners have alternative timing
- Important to obtain relevant professional advice to confirm that this is a viable option (e.g. compliance with EU procurement rules, if applicable, and the Authority's own financial regulations)
- Your Audit Panel (see later) should be involved in deciding on this option
- Audit fees can be benchmarked for reasonableness against published data



## Option 2 - Stand-alone tender

### What does this involve?



#### Cons

- Tendering for your external audit service through the Authority's own procurement process
- The Authority will need to establish an Audit Panel, which will recommend who the auditor should be following the tender process
- Provides the Authority with the greatest discretion and autonomy over the approach to be followed and in decision making
- The Authority will incur additional costs (officer time) through running its own procurement process
- The establishment of an Audit Panel may increase costs and will involve recruiting independent members

#### Points to note

- The Audit Commission produced a <u>document</u> summarising learning points from its 2012 and 2014 procurements of audit services
- This may provide some useful pointers (although note that these procurements were unique to the Audit Commission's regime so the points may not all be relevant)
- CIPFA has published <u>guidance</u> on Auditor Panels



## Option 3 - Combined tender

### What does this involve?

#### Pros

#### Cons

- A variation of option
   2, where two or more authorities undertake
   a joint procurement
   process
- This might operate on one or more of a location basis, within or across tiers of local government, or by type of authority
- Although not fully autonomous, this still offers a high degree of influence over the approach and decision making
- May provide a more competitive audit fee than a stand-alone tender (option 2) through offering a greater volume of work to bidding audit firms
- Procurement costs can be shared across participating authorities
- Audit Panels may also be shared across the authorities

- Less discretion and autonomy over approach and decision making than option 2
- The Authority will incur additional costs (officer time) through running a joint procurement process
- Establishing an Audit Panel (stand-alone or shared) may increase costs and will involve recruiting independent members

#### Points to note

- Dependent on identifying suitable partner organisations which have common objectives and similar ideas on the approach to follow
- Well-suited to authorities with established shared service, joint working or strategic partnership arrangements
- This options implies that all partner organisations would select a common auditor, but that need not be the case



## Option 4 - Sector-led procurement

### What does this involve?

#### Pros

#### Cons

#### Opting into a sectorled procurement process

- The Secretary of State has designated Public Sector Audit Appointments Ltd (PSAA) as an 'appointing person'
- PSAA will undertake the necessary procurement activity to contract with a number of audit firms
- PSAA will then propose an auditor to each participating authority, having considered issues such as auditor independence

- Avoids the costs and practicalities of running a stand-alone (option 2) or joint procurement (option 3) exercise
- The procurement process will be run by an organisation with experience of procuring external audit services
- Avoids the need to establish an Audit Panel

- The least discretion over the choice of auditor of all options (although PSAA is establishing an advisory panel of key audited body stakeholders)
- PSAA is still consulting over detailed elements of how the procurement will operate, so at this point in time there is not absolute clarity (it has issued a prospectus setting out expectations)

#### **Points to note**

- In simple terms, this option is the most similar to the current arrangements, albeit on an opt-in basis
- Further information on PSAA's role and intended approach can be found on its website
- The deadline for opting into this option with PSAA is 9 March 2017
- PSAA's costs would be absorbed into audit fees payable by participating authorities



### Requirements to note

Regardless of the procurement option followed, there are a number of requirements which apply

#### Au •Th to

Audit Panel
The Panel's role (which can be fulfilled by PSAA) is to recommend which auditor to appoint and have oversight over any non-audit services provided by the auditor
It must have an independent (unelected) Chair and a majority of independent

### Professional standards

• Regardless of the option followed to appoint them, your auditor must comply with the Code of Audit Practice issued by the National Audit Office

# Ō

#### Timing

members

•Regardless of the procurement option followed, authorities must appoint an auditor for the 2018/19 financial year by 31 December 2017

#### **Registered auditor**

•You can only appoint an audit firm which is registered for local audit (ICAEW maintains a Local Audit register)

•As a leading local government auditor, KPMG is registered with ICAEW for local audit and has a substantial number of registered Key Audit Partners



## Key considerations when appointing auditors

When you are deciding who to appoint as your external auditor you will need to consider a range of factors

Key areas to consider are as follows

#### Quality

- This is the most important consideration and should be appropriately weighted in any scoring methodology for assessing tenders
- Relevant considerations include audit methodologies, systems and processes, staff training and expertise, and quality monitoring arrangements

#### **Experience**

- Local government auditing is a specialist business and your auditor must have the necessary skills and sector experience
- This is not just about understanding local authority financial reporting, but extends into auditors' value for money audit responsibilities and 'challenge' work



# Key considerations (continued)

#### Independence

- You will need to consider possible relationships with audit firms via non-audit work such as consultancy and tax advice
- Independence is also an important mind-set for auditors to adopt, where you should be satisfied that your future auditor will be sufficiently challenging
- Your current auditor should not be constrained in exercising their duties by any tendering process

#### Organisational fit

 As with any service it is important to consider how the people you see in the audit team fit with your own organisational culture – i.e. can you work with these people

#### Price



- Like any other out-sourced service you need to obtain good value through a competitive audit fee
- However, best value does not mean the cheapest quote
- The fee must be sufficient to provide a good quality service taking account of the scale, nature and risk profile of your organisation, and also the requirement for your auditor to comply with auditing standards and other statutory duties

#### **Other services**

- Although ethical standards provide limitations, you should consider what other services you might want your auditor to perform
- This might include other assurance services (e.g. certifying grant claims) or more added-value services



## KPMG in the local government sector



#### We are a leading firm in local government audit and assurance – in England we audit:

- 27% of local authorities
- 21% of police bodies
- 26% of fire & rescue authorities



### We use cutting edge technology and audit techniques

- our eAudIT system embeds our audit methodology to drive quality
- we use Data & Analytics tools to enhance audit quality and provide insight



### We contribute to and influence technical development and financial reporting

- we are represented on CIPFA/LAASAC and LAAP
- we are a member of the NAO's Local Auditor Advisory Group
- we actively participate in the CIPFA community



### We have substantial specialist local government audit resource

- we have 22 Partners and Directors registered as Key Audit Partners with ICEAW
- our public sector audit teams operate in all regions providing national coverage
- our subject matter experts enhance our audit work



### We provide thought leadership to challenge and support the sector

- through KPMG publications on key issues affecting the sector
- through articles and case studies in the trade press



#### We add value and support our clients

- through our highly regarded Audit Committee Institute
- through workshops, seminars and events for financial professionals and others
- through the challenge, insight and improvement focus of our audit work







#### https://home.kpmg.com/uk/en/home/industries/government-publicsector/local-government.html

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

© 2016 KPMG LLP, a UK limited liability partnership and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved.

The KPMG name, logo are registered trademarks or trademarks of KPMG International.