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Debbie Hanson  
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16 March 2023


This letter of representations is provided in connection with your audit of the consolidated and council financial statements of East Hertfordshire District Council ("the Group and Council") for the year ended 31 March 2021. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the consolidated and council financial statements give a true and fair view of the Group and Council financial position of East Hertfordshire District Council as of 31 March 2021 and of its financial performance and its cash flows for the year then ended in accordance with, for the Group and Council, the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

We understand that the purpose of your audit of our consolidated and council financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing, which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

#### A. Financial Statements and Financial Records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with, for the Group and Council, the Accounts and Audit Regulations 2015 and the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

2. We acknowledge, as members of management of the Group and Council, our responsibility for the fair presentation of the consolidated and council financial statements. We believe the consolidated and council financial statements referred to above give a true and fair view of the financial position, financial performance and cash flows of the Group and Council in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 and are free of material misstatements, including omissions. We have approved the consolidated and council financial statements.
  3. The significant accounting policies adopted in the preparation of the Group and Council financial statements are appropriately described in Group and Council financial statements.
  4. As members of management of the Group and Council, we believe that the Group and Council have a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 for the Council that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic on our system of internal controls.
  5. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the consolidated and Council financial statements taken as a whole. We have not corrected these differences identified and brought to our attention by the auditor because the difference is deemed to be immaterial by management.
  6. We confirm the Group and Council does not have securities (debt or equity) listed on a recognized exchange
- B. Non-compliance with law and regulations, including fraud
1. We acknowledge that we are responsible for determining that the Group and Council's activities are conducted in accordance with laws and regulations and that we are responsible for identifying and addressing any non-compliance with applicable laws and regulations, including fraud.
  2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.
  3. We have disclosed to you the results of our assessment of the risk that the consolidated and Council financial statements may be materially misstated as a result of fraud.
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4. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Group or Council (regardless of the source or form and including without limitation, any allegations by “whistleblowers”), including non-compliance matters:

- involving financial statements;
- related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the consolidated or Council’s financial statements;
- related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Group or Council’s activities, its ability to continue to operate, or to avoid material penalties;
- involving management, or employees who have significant roles in internal controls, or others; or
- in relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

#### C. Information Provided and Completeness of Information and Transactions

1. We have provided you with:

- Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- Additional information that you have requested from us for the purpose of the audit; and
- Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.


2. All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the consolidated and Council financial statements, including those related to the COVID-19 pandemic and including those related to the conflict can related sanction in Ukraine, Russia and/or Belarus.

3. We have made available to you all minutes of the meetings of the Council and the Audit and Governance Committee (or summaries of actions of recent meetings for which minutes have

not yet been prepared) held through the year to the most recent meeting on the following date:  
16 March 2023.

4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Group and Council's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the year ended, as well as related balances due to or from such parties at the year end. These transactions have been appropriately accounted for and disclosed in the consolidated and council financial statements.
5. We believe that the significant assumptions we used in making accounting estimates and related disclosures are appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21, including those measured at fair value, are reasonable.
6. We have disclosed to you, and the Group and Council has complied with, all aspects of contractual agreements that could have a material effect on the consolidated and council financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.
7. From the date of our last management representation letter, being 26 November 2020, through the date of this letter we have disclosed to you any unauthorized access to our information technology systems that either occurred or to the best of our knowledge is reasonably likely to have occurred based on our investigation, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants), to the extent that such unauthorized access to our information technology systems is reasonably likely to have a material impact to the financial statements, in each case or in the aggregate.

#### **D. Liabilities and Contingencies**

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the consolidated and Council financial statements.
  2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.
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3. We have recorded and/or disclosed, as appropriate, all liabilities related to litigation and claims, both actual and contingent. We have not given any guarantees to third parties.

#### **E. Going Concern**

1. Note 1.ii to the consolidated and Council financial statements discloses all the matters of which we are aware that are relevant to the Group and Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

#### **F. Subsequent Events**

1. As outlined in Note 37, there have been no events, including events related to the COVID-19 pandemic, and including events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus, subsequent to year end which require adjustment of or disclosure in the consolidated and Council financial statements or notes thereto.


#### **G. Group audits**

1. There are no significant restrictions on our ability to distribute the retained profits of the Group because of statutory, contractual, exchange control or other restrictions other than those indicated in the Group financial statements.
2. Necessary adjustments have been made to eliminate all material intra-group unrealised profits on transactions amongst the Council, subsidiary undertakings and associated undertakings.

#### **H. Other information**

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the Annual Report 2020/21, including the Annual Governance Statement.
2. We confirm that the content contained within the other information is consistent with the financial statements.

#### **Contingent Liabilities**

1. We are unaware of any violations or possible violations of laws or regulations the effects of which should be considered for disclosure in the financial statements or as the basis of recording a contingent loss (other than those disclosed or accrued in the financial statements).
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2. We are unaware of any known or probable instances of non-compliance with the requirements of regulatory or governmental authorities, including their financial reporting requirements, and there have been no communications from regulatory agencies or government representatives concerning investigations or allegations of non-compliance

### **Ownership of Assets**

1. Except for assets capitalised under finance leases, the Group and Council has satisfactory title to all assets appearing in the balance sheet(s), and there are no liens or encumbrances on the Group and Council's assets, nor has any asset been pledged as collaterals. All assets to which the Group and Council has satisfactory title appear in the balance sheet(s).
2. All agreements and options to buy back assets previously sold have been properly recorded and adequately disclosed in the consolidated and Council financial statements.
3. There are no formal or informal compensating balance arrangements with any of our cash and investment accounts.

### **Reserves**

1. We have properly recorded or disclosed in the consolidated and Council financial statements the useable and unusable reserves.

### **Use of the Work of a Specialist**

1. We agree with the findings of the specialists that we engaged to evaluate the valuation of land and building assets and investment property, defined benefit pension scheme, business rates appeals provision and financial instruments and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the consolidated and council financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialist.

### **Estimates**

#### **Valuation of land and building assets and investment property, defined benefit pension scheme and business rates appeals provision**



1. We confirm that the significant judgments made in making the estimates on valuation of land and building assets and investment property, defined benefit pension scheme and business rates appeals provision have taken into account all relevant information and the effects of the COVID-19 pandemic on 31 March 2021 of which we are aware.
2. We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied or used in making the estimates on valuation of land and building assets and investment property, defined benefit pension scheme and business rates appeals provision.
3. We confirm that the significant assumptions used in making the estimates on valuation of land and building assets and investment property, defined benefit pension scheme and business rates appeals provision appropriately reflect our intent and ability to carry out *[describe the specific courses of action]* on behalf of the entity.
4. We confirm that the disclosures made in the consolidated and Council entity financial statements with respect to the accounting estimate(s), including those describing estimation uncertainty and the effects of the COVID-19 pandemic on 31 March 2021, are complete and are reasonable in the context of the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
5. We confirm that appropriate specialized skills or expertise has been applied in making the estimates on valuation of land and building assets and investment property, defined benefit pension scheme and business rates appeals provision.
6. We confirm that no adjustments are required to the accounting estimate(s) and disclosures in the consolidated and parent entity financial statements, including due to the COVID-19 pandemic.

#### **Retirement benefits**

1. On the basis of the process established by us and having made appropriate enquiries, we are satisfied that the actuarial assumptions underlying the scheme liabilities are consistent with our knowledge of the business. All significant retirement benefits and all settlements and curtailments have been identified and properly accounted for.


*Yours faithfully,*



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(Chief Financial Officer/Finance Director)

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(Chairman of the Audit Committee)



Communication schedule for uncorrected misstatements

Entity: East Hertfordshire District Council

Period Ended: 31-Mar-2021

Currency: GBP

Uncorrected misstatements				Analysis of misstatements							Income statement effect of the prior period	
No.	W/P ref.	Account (Note 1)		Assets Current	Assets Non-current	Liabilities Current	Liabilities Non-current	Equity components	Effect on the current period OCI	Income statement effect of the current period	Prior period	Non taxable
		(misstatements are recorded as journal entries with a description )		Debit/(Credit) (Note 2)	Debit/(Credit) (Note 2)	Debit/(Credit) (Note 2)	Debit/(Credit) (Note 2)	Debit/(Credit) (Note 2)	Debit/(Credit)	Debit/(Credit)	Debit/(Credit)	Non taxable

Factual misstatements:

		EHD/C share of unadjusted increase in valuation of pension fund assets (per the PF auditor response).					238,000			(238,000)		
		Pension Liability										
		Actuarial Gain										

		We noted that the amount of revaluation loss to be charged to CIES should be 548k instead of 436k (difference of 111k).								111,000		
		Revaluation loss - CIES								(111,000)		
		Revaluation loss - revaluation reserve										
		MIRS								111,000		
		Capital adjustment account										

Judgmental misstatements:

		The OLB portion of Charingtons House is outside the range determined by EYRE for the asset. This results in an overstatement in OLB by 354k.								353,544		
		Revaluation Reserve			(353,544)							
		PPE-OLB										

		Overstatement of depreciation on infrastructure assets			120,159							
		PPE - Infrastructure assets										
		Depreciation								(120,159)		

Total of uncorrected misstatements before income tax 0 233,385 0 238,000 0 4,544 8,159

Total of uncorrected misstatements 0 233,385 0 238,000 0 4,544 8,159

Financial statement amounts 32,905,000 120,194,000 23,904,000 52,325,000 76,870,000 2,307,000

Effect of uncorrected misstatements on F/S amounts 0.0% -0.2% 0.0% -0.5% 0.0% -0.4%

Memo: Total of non-taxable items (marked 'X' above)

Uncorrected misstatements before income tax

Less: Tax effect of misstatements at current year marginal rate

Uncorrected misstatements in income tax

Cumulative effect of uncorrected misstatements after tax but before turnaround

Turnaround effect of prior period uncorrected misstatements

After tax Memo: Before tax

Communication schedule for uncorrected misstatements

Entity: East Hertfordshire District Council

Period Ended: 31-Mar-2021

Currency: GBP

Uncorrected misstatements		Analysis of misstatements Debit/(Credit)							Income statement effect of the prior period	
No.	W/P ref.	Account (Note 1)	Assets Current Debit/(Credit) (Note 2)	Assets Non-current Debit/(Credit) (Note 2)	Liabilities Current Debit/(Credit) (Note 2)	Liabilities Non-current Debit/(Credit) (Note 2)	Equity components Debit/(Credit)	Effect on the current period OCI Debit/(Credit)	Income statement effect of the current period Debit/(Credit)	Non taxable
		(misstatements are recorded as journal entries with a description )								

All factual and projected misstatements: 0

Judgmental misstatements (Note 3): 0

Cumulative effect of uncorrected misstatements, after turnaround effect: -0.4%

Current year income before tax: 2,307,000

Current year income after tax: 2,307,000