

The Audit Findings for Waverley Borough Council

Year ended 31 March 2022

May 2023



Contents

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

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

Name : Paul Cuttle For Grant Thornton UK LLP Date : 02/05/2023 Grant Thornton UK LLP is a limited liability partnership registered in England and Wales: No.OC307742. Registered office: 30 Finsbury Square, London, EC2A 1AG. A list of members is available from our registered office. Grant Thornton UK LLP is authorised and regulated by the Financial Conduct Authority. Grant Thornton UK LLP is a member firm of Grant Thornton INternational Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. Services are delivered by the member firms. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.

1. Headlines

This table summarises the key findings and other matters arising from the statutory audit of Waverley Borough Council ('the Council') and the preparation of the Council's financial statements for the year ended 31 March 2022 for those charged with governance.

Financial Statements

 Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion: the group and Council's financial statements give a true and fair view of the financial position of the group and Council and the group and 	The draft financial statements submitted for audit were of a good quality and we have only identified few presentational adjustments. These do not have any impact on council's Income and Expenditure Statement. Audit adjustments are detailed in Appendix A. We have also raised recommendations for management as a result of our audit work in Appendix A.
Council's income and expenditure for the year; and	There are no matters of which we are aware that would require modification of our audit opinion, subject to the completion of the following outstanding matters;
have been properly prepared in accordance with the CIPFA/LASAAC	receipt of management representation letter
code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.	review of the final set of financial statements
	 net pensions liability (sector wide issue explained on page 8)
We are also required to report whether other information published together with the audited financial statements (including the Annual Governance Statement (AGS), Narrative Report is materially inconsisten	We have concluded that the other information to be published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.
with the financial statements, or our knowledge obtained in the audit or otherwise appears to be materially misstated.	Our anticipated audit opinion will be unqualified subject to conclusion on above outstanding matters.
Under the National Audit Office (NAO) Code of Audit Practice ('the	We have completed all of our VFM work and issued our Auditor's Annual Report in February 2023.
Code'), we are required to consider whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are now required to report in more detail on	As part of our work, we considered whether there were any risks of significant weakness in the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources.
the Council's overall arrangements, as well as key recommendations on any significant weaknesses in arrangements identified during the audit.	We have no findings which indicate a significant weakness.
Auditors are required to report their commentary on the Council's arrangements under the following specified criteria:	

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

1. Headlines

Statutory duties	
The Local Audit and Accountability Act 2014 ('the Act') also requires us to:	We have not exercised any of our additional statutory powers or duties.
 report to you if we have applied any of the additional powers and duties ascribed to us under the Act; and 	We expect to certify the completion of the audit upon the completion of our audit work.
• to certify the closure of the audit.	
Significant Matters	We did not encounter any significant difficulties or identify any significant matters arising during our audit.

2. Financial Statements

Overview of the scope of our audit

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

As auditor we are responsible for performing the audit, in accordance with International Standards on Auditing (UK) and the Code, which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

Audit approach

Our audit approach was based on a thorough understanding of the group business and is risk based, and in particular included:

• An evaluation of the group internal controls environment, including its IT systems and controls;

An evaluation of the components of the group based on a measure of materiality considering each as a percentage of the group's gross revenue expenditure to assess the significance of the component and to determine the planned audit response. e.g. From this evaluation we determined that work over Property plant and equipment revaluation and cash and bank were required which was completed by GT.

 Substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks

Conclusion

We have substantially completed our audit of your financial statements and subject to outstanding queries being resolved, we anticipate issuing an unqualified audit opinion following the Audit Committee meeting on 31.05.2023, subject to completion of the following outstanding items:

- receipt of management representation letter
- review of the final set of financial statements
- net pensions liability

Acknowledgements

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

2. Financial Statements

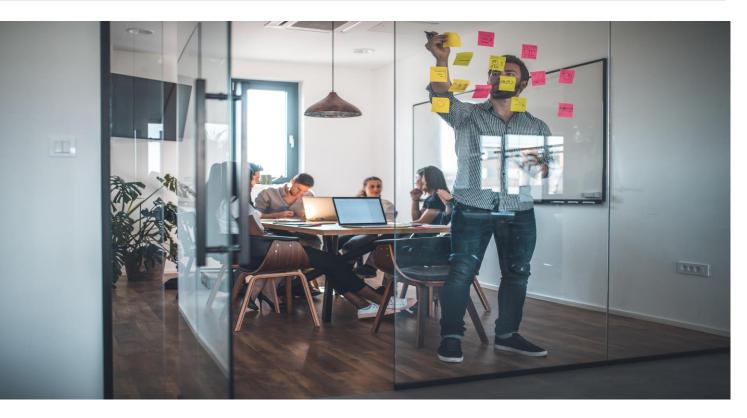


Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Materiality levels remain the same as reported in our audit plan

	Group Amount (£m)	Council Amount (£m)	
Materiality for the financial statements	£1.565	£1.557	
Trivial matters	£.07830	£.07785	



2. Financial Statements - Significant risks

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement. This section provides commentary on the significant audit risks communicated in the Audit Plan.

Risks identified in our Audit Plan	Commentary
The revenue cycle includes fraudulent transactions Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue. This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.	 Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Council, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because: there is little incentive to manipulate revenue recognition; opportunities to manipulate revenue recognition are very limited; Our audit work has not identified any issues to change our strategy towards revenue recognition.
Management override of controls Under ISA (UK) 240 there is a non rebuttable presumed risk that the risk of management override of controls is present in all entities. You face external scrutiny of your spending, and this could potentially place management under undue pressure in terms of how they report performance. We therefore identified management override of control, in particular journals, management estimates and transactions outside the course of business as a significant risk, which was one of the most significant assessed risks of material misstatement.	 To address this risk we: evaluated the design effectiveness of management controls over journals; analysed the journals listing and determined the criteria for selecting high risk or unusual journals; identified and tested high risk and unusual journals for appropriateness and corroboration; and gained an understanding of the accounting estimates and critical judgements applied by management and considered their reasonableness. The Council has appropriately disclosed in its accounting policies, any critical judgement, estimates or significant unusual transactions. Our audit work has not identified any issues in respect of this risk.

2. Financial Statements - Significant risks

Risks identified in our Audit Plan	Commentary
Valuation of land and buildings including investment	To address this risk we;
properties and council dwellings	 evaluated management's processes and assumptions for the calculation of the estimate, including the instructions issued to the Council's external valuer and the scope of their work;
Waverley Borough Council revalue land and buildings on a rolling five yearly basis. This valuation represents a significant	 evaluated the competence, capabilities and objectivity of the external valuer;
estimate by management in the financial statements due to the	 confirmed from the valuer the basis on which the valuation was carried out;
size of the numbers involved i.e. £606.2m (544.3m in 2020/21)	 challenged the information and assumptions used by the valuer;
and the sensitivity of this estimate to changes in key assumptions.	 tested, on a sample basis, revaluations made during the year to ensure they had been input correctly into the Council's asset register and financial statements;
Additionally, management will need to ensure the carrying value	• we have assessed for a sample of assets markets rates for comparable properties;
in the Council financial statements is not materially different from the current value or the fair value (for investment	• evaluated how management concluded that the carrying value of assets not revalued was not materially misstated.
properties) at the financial statements date, where a rolling programme is used.	Our work over valuation of council dwellings and other land and buildings and investment properties has not identified any issues in respect of this risk.
Valuation of pension fund net liability	For the significant risk, we have:
Your pension fund net liability, as reflected in its balance sheet as the net defined benefit liability, represents a significant	 updated our understanding of the processes and controls put in place by management to ensure that the Authority's pension fund net liability is not materially misstated and evaluated the design of the associated controls;
estimate in the financial statements.	• evaluated the instructions issued by management to the actuary for this estimate and the scope of the actuary's work;
The pension fund net liability is considered a significant estimate due to the size of the numbers involved £62.868m as at	• assessed the competence, capabilities and objectivity of the actuary who carried out the Authority's pension fund valuation;
31.03.2022 (PY £79.999m) and the sensitivity of the estimate to changes in key assumptions.	 undertaken procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report.
We therefore identified valuation of the Council's pension fund	We have also:
net liability as a significant risk, which was one of the most significant assessed risks of material misstatement.	• assessed the accuracy and completeness of the information provided to the actuary to estimate the liability;
	 tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary.
	As the Council received an updated full actuarial valuation on 31 March 2023, we are in discussions with management on whether this is an adjusting event that would impact on pension related disclosures. This is currently a sector wide issue and we await further guidance on potential actions and what work is required by auditors.
	Subject to the above, our audit work to date has not identified any significant issues in respect of valuation of the Pension Fund net liability.

2. Financial Statements - key judgements and estimates

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

Assessment

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

Significant judgement or

estimate	Summary of management's approach	Audit Comments	Assessment
Valuations of Land and Building, Investment property, Council dwellings	The Council carries out a rolling programme of revaluations that ensures that all land and buildings, investment properties and council dwellings required to be measured at current value is re-valued every three years. Council Dwellings and land and buildings were valued in accordance with the Royal Institute of Chartered Surveyors (RICS). The Councils external valuer, Montagu Evans undertook the valuations of General Fund and HRA land and buildings for 2021-22.	 We considered and completed the following in the course of our testing: assessment of management's expert Montagu Evans; completeness and accuracy of the underlying information used to determine the estimate; impact of any changes to valuation method; consistency of estimate against Montagu Evans report; reasonableness of increase in estimate overall; adequacy of disclosure of estimate in the financial statements; 	
	For assets where there was no market-based evidence of fair value because of the specialist nature of an asset, depreciated replacement cost (DRC) is used as an estimate of fair value. All assets are assessed annually for evidence of impairment.	Our work over valuation of council dwellings and other land and buildings and investment properties has not identified any issues in respect	

2. Financial Statements - key judgements and estimates

Significant judgement or

estimate	Summary of management's approach	Audit Comments	Assessment
Valuations of Net pension liability –	The Council recognises and discloses the retirement benefit obligation in accordance with the measurement	 We assessed management's actuarial expert and concluded they are clearly competent, capable and objective in producing the estimate; 	TBC
LGPS	and presentational requirement of IAS 19 'Employee Benefits'.	 We carried out analytical procedures to conclude on whether the Council's share of LGPS pension assets and liabilities was reasonable. We concluded 	
	At 31 March 2022 the Council has a net pension liability of £62.868m (2020/21 £79.999m) relating to the Local	the Council's share of assets and liabilities was analytically in line with our expectations;	
	Government Pension Scheme.	We engaged an auditor's actuary expert to challenge the reasonableness of the	
	Waverley borough council uses an external actuary Hymans Robertson to provide an actuarial valuation estimate of the Council's assets and liabilities deriving from these schemes. A full valuation is required every	estimation method used and the approach taken by the actuary to verity the completeness and accuracy of information used. We were satisfied that the actuary was provided with complete and accurate information about the workforce, and that the method applied was reasonable;	
	three years. The latest full actuarial valuation was completed in 2021- 22 for the LGPS. A roll forward approach is used in intervening periods. The valuations are based on key	 The auditors' expert provided us with indicative ranges for assumptions by which we have assessed the assumptions made by management's expert. As set out below all assumptions were within the expected range and were therefore considered 	
	assumptions such as life expectancy, discount rates, salary growth and investment return. Given the significant value of the net pension fund liability small changes in assumptions can result in significant valuation movements	• We have yet to conclude on net pensions liability due to updated IAS 19 report being issued. Thus our work over net pensions liability is still in progress.	

2. Financial Statements - other communication and responsibilities

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

Issue	Commentary
Matters in relation to fraud	We have previously discussed the risk of fraud with management. We have not been made aware of any significant incidents in the period. No other issues have been identified during the course of our audit procedures.
Matters in relation to related parties	We are not aware of any related parties or related party transactions which have not been disclosed.
Matters in relation to laws and regulations	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
Written representations	A letter of representation has been requested from the Council.
Confirmation requests from third parties	We seek external confirmations from relevant banks and financial institutions to support our review of the Council's yearend cash and investment balances. For one confirmation further inquiries were required and an amended confirmation was received. We have now received positive confirmation for all balances.
Accounting practices	We have evaluated the appropriateness of the Council's accounting policies, accounting estimates and financial statement disclosures. Our review found no material omissions in the financial statements.
Audit evidence and explanations/ significant difficulties	All information and explanations requested from management was provided.
Other information	We are required to give an opinion on whether the other information published together with the audited financial statements including the Annual Governance Statement and Narrative Report is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.
	Our work to date has not identified any inconsistencies. Subject to the completion of all outstanding work we plan to issue an unmodified opinion in this respect.

2. Financial Statements - other communication and responsibilities

Issue	Commentary
Matters on which	We are required to report on a number of matters by exception in a number of areas:
we report by exception	- If the Annual Governance Statement does not comply with disclosure requirements set out in CIPFA/SOLACE guidance or is misleading or inconsistent with the information of which we are aware from our audit,
	if we have applied any of our statutory powers or duties.
	We have nothing to report on these matters.
	- where we are not satisfied in respect of arrangements to secure value for money and have reported a significant weakness.
	Our detailed work on Value for Money is to be completed.
Specified procedures for Whole of	We are required to carry out specified procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions.
Government Accounts	Detailed work is not required as the Council does not exceed the threshold specified by NAO. However reporting of finalised financial statement figures is required once the financial statement work is finalised.
Certification of the closure of the audit	We will issue certification of the closure of the 2021/22 audit, once 2021/22 accounts are signed off.



2. Financial Statements - other communication requirements

	lssue	Commentary
Our responsibility	Going concern	In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies.
		Practice Note 10 sets out the following key principles for the consideration of going concern for public sector entities:
As auditors, we are required to "obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the		 the use of the going concern basis of accounting is not a matter of significant focus of the auditor's time and resources because the applicable financial reporting frameworks envisage that the going concern basis for accounting will apply where the entity's services will continue to be delivered by the public sector. In such cases, a material uncertainty related to going concern is unlikely to exist, and so a straightforward and standardised approach for the consideration of going concern will often be appropriate for public sector entities
financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern" (ISA		 for many public sector entities, the financial sustainability of the reporting entity and the services it provides is more likely to be of significant public interest than the application of the going concern basis of accounting. Our consideration of the Council's financial sustainability is addressed by our value for money work, which is covered elsewhere in this report.
(UK) 570).		Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by the Council meets this criteria, and so we have applied the continued provision of service approach. In doing so, we have considered and evaluated:
		the nature of the Council and the environment in which it operates
		the Council's financial reporting framework
		• the Council's system of internal control for identifying events or conditions relevant to going concern
		management's going concern assessment.
		On the basis of this work, we have obtained sufficient appropriate audit evidence to enable us to conclude that:
		 a material uncertainty related to going concern has not been identified
		 management's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

3. VFM - our procedures and conclusions

We have completed all of our VFM work and have issued our draft Auditor's Annual Report in February 2023.

As part of our work, we considered whether there were any risks of significant weakness in the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources.

We have no findings which indicate a significant weakness.

4. Independence and ethics

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

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

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

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

Details of fees charged are detailed in Appendix B.

Audit and non-audit services

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Council. The following non-audit services were identified:

Service	Fees £	Threats identified	Safeguards
Audit related			
Certification of Housing Benefit grant	£23,000	Self-Interest (because this is a recurring fee)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is immaterial in comparison to the total fee for the audit and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.
Certification of Housing Capital receipts grant	£6,000	Self-Interest (because this is a recurring fee)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is immaterial in comparison to the total fee for the audit and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.



A. Action plan – Audit of Financial Statements

We have identified one recommendation for the group as a result of issues identified during the course of our audit. We have agreed our recommendations with management and we will report on progress on these recommendations during the course of the 2021/22 audit. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

Assessment	Issue and risk	Recommendations
•	Our review starter and leavers process identified a control finding. During our testing on starters and leavers, WBC were unable to provide approval forms for two starters and three leavers. We were, however able to test additional samples reasonably and found no issues. Lack of evidence raises the risk of error and non compliance going undetected. It can also lead to inability to prove compliance and undermine trusts credibility with respect to financial reporting.	 Recommendations We recommend that the management introduce a process that outlines how starters and leaver form must be stored, and assign an individual or team who is responsible for keeping oversight over starter/leaver form record keeping. Management response HR have built a checklist into their new starter and leaver process which includes an email to be sent to inform of any changes to staff. This is predominantly completely by the HR Admin, or alternatively the HR Officers in their absence. A copy of the checklist is filed onto an individual's civica file.

Controls

- High Significant effect on financial statements
- Medium Limited Effect on financial statements
- Low Best practice

B. Audit Adjustments

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

Impact of unadjusted misstatements

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

Detail	Comprehensive Income and Expenditure Statement £m		Impact on total net expenditure ${\tt fm}$
During our testing over completeness of creditor, we noted 2 invoices which were posted after the year end, related to 21-22 but weren't accrued for, therefore the cost wasn't recognised in the correct period. We extrapolated this error over the full population of invoices, resulting in an unadjusted misstatement. This is below our headline materiality but above our triviality therefore needs to be reported.	(£0.1289)	(£0.1289)	(£0.1289)
Overall impact	(£0.1289)	(£0.1289)	(£0.1289)

Impact of adjusted presentational errors

FSA	Detail	Auditor Comments	Adjusted?
Other Income	During our testing on other income, we noted for one of the samples selected had the description ARG grant income. We found out that this should have been coded to the ARG line in note 11, rather than other fees and charges in note 7. The amount of this grant was £299k . Management have adjusted the accounts for this error.		Yes
Remuneration report	During our testing on note 30: Officers' Remuneration,we noted one discrepancy between two of the salary bands when compared to payroll records. These were in bands £70-74k and £75k-79K. This was amended by management.	We suggest that the salary bands be corrected to reflect the correct banding disclosure.	Yes

C. Fees

We set out below our fees charged for the audit. The 2021/22 fee is subject to additional work required in relation to pensions

Audit fees	2020/21	2021/22
Statutory Audit (excluding VAT)	£62,684	£67,564

Similar to 2020/21, the Council will receive a grant to support additional fees relating to new accounting standards and the change to the VFM audit. The Council's grant will be £21,320.

Breakdown of 2021/22 fee

Our proposed fee communicated in our Audit Plan was £67,694. This did not take into account baked in fees or group audit fees. The breakdown the proposed fee is therefore:

Breakdown of 2021/22 fee	2021/22
Scale fee published by PSAA (an increase of £3,200 from prior year scale fee as some pension and PPE costs are included)	£44,764
Group audit	£3,000
Pensions (in addition to baked in fee included above)	£588
PPE valuation work (in addition to baked in fee included above)	£587
FRC enhanced procedures	£3,125
VFM reporting	£9,000
ISA540 additional procedures	£3,000
Journals and grants testing	£3,500
Total	£67,564



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