



Auditor's Annual Report
Gedling Borough Council – year ended 31 March 2024

February 2025

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Introduction

Introduction

Purpose of the Auditor's Annual Report

Our Auditor's Annual Report (AAR) summarises the work we have undertaken as the auditor for Gedling Borough Council ('the Council') for the years ended 31 March 2024. Although this report is addressed to the Council, it is designed to be read by a wider audience including members of the public and other external stakeholders.

Our responsibilities are defined by the Local Audit and Accountability Act 2014 and the Code of Audit Practice ('the Code') issued by the National Audit Office ('the NAO'). The remaining sections of the AAR outline how we have discharged these responsibilities and the findings from our work. These are summarised below.



Opinion on the financial statements

We anticipate issuing our audit report for the year ended 31 March 2024 in February 2025. Our audit report will include a disclaimer of opinion. This means our audit report will not express an opinion on the financial statements and no assurance will be provided. It was necessary to issue a disclaimer of opinion as amendments to the Account and Audit Regulations introduced a statutory deadline for publication of the Council's financial statements and the need to respond to an identified and complex fraud. We were unable to complete the audit procedures necessary to obtain sufficient appropriate audit evidence on which to base our opinion before the date the Council published its audited financial statements.



Value for Money arrangements

We have completed our work on the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources and had issued recommendations in relation to identified significant weaknesses in those arrangements.

Section 3 provides our commentary on the Council's arrangements and a summary of our recommendations.



Wider reporting responsibilities

We are awaiting final information from the NAO on group instructions for the whole of government accounts return.

02

Audit of the financial statements

Audit of the financial statements

The scope of our audit and the results of our opinion

Our audit was conducted in accordance with the requirements of the Code, and International Standards on Auditing (ISAs). The purpose of our audit is to provide reasonable assurance to users that the financial statements are free from material error. Amendments to the Accounts and Audit Regulations introduced a deadline for publication of local authorities' audited 2023/24 financial statements. Prior to issuing our audit report, the ISAs require us to determine whether we have obtained sufficient appropriate audit evidence based on the audit procedures completed at that date. We concluded we had not obtained sufficient appropriate audit evidence to enable us to express an opinion on whether the financial statements present a true and fair view and have been prepared, in all material respects, in line with the Code of Practice on Local Authority Accounting. Consequently, as required by the ISAs, we modified our audit report and issued a disclaimer of opinion. This means, in our audit report to be issued in February 2025, we will not express an opinion on the Council's financial statements.

We were required to report to management and those charged with governance significant risks identified at the planning stage of our audit, uncorrected misstatements that we identified and any control deficiencies which came to our attention as part of the audit procedures we completed prior to issuing our audit report. Detailed reports will be taken to the Audit Committee in February 2025 and be available via the Council's website. The matters we reported are summarised in Appendix A.

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Our work on Value for Money
arrangements

VFM arrangements

Overall Summary



VFM arrangements – Overall summary

Approach to Value for Money arrangements work

We are required to consider whether the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The NAO issues guidance to auditors that underpins the work we are required to carry out and sets out the reporting criteria that we are required to consider. The reporting criteria are:



Financial sustainability - How the Council plans and manages its resources to ensure it can continue to deliver its services.



Governance - How the Council ensures that it makes informed decisions and properly manages its risks.



Improving economy, efficiency and effectiveness - How the Council uses information about its costs and performance to improve the way it manages and delivers its services.

Our work is carried out in three main phases.

Phase 1 - Planning and risk assessment

At the planning stage of the audit, we undertake work so we can understand the arrangements that the Council has in place under each of the reporting criteria; as part of this work we may identify risks of significant weaknesses in those arrangements.

We obtain our understanding of arrangements for each of the specified reporting criteria using a variety of information sources which may include:

- NAO guidance and supporting information
- Information from internal and external sources including regulators
- Knowledge from previous audits and other audit work undertaken in the year
- Interviews and discussions with staff and directors

Although we describe this work as planning work, we keep our understanding of arrangements under review and update our risk assessment throughout the audit to reflect emerging issues that may suggest there are further risks of significant weaknesses.

Phase 2 - Additional risk-based procedures and evaluation

Where we identify risks of significant weaknesses in arrangements, we design a programme of work to enable us to decide whether there are actual significant weaknesses in arrangements. We use our professional judgement and have regard to guidance issued by the NAO in determining the extent to which an identified weakness is significant.

We outline the risks that we have identified and the work we have done to address those risks on page 16.

Phase 3 - Reporting the outcomes of our work and our recommendations

We are required to provide a summary of the work we have undertaken and the judgments we have reached against each of the specified reporting criteria in this Auditor's Annual Report. We do this as part of our Commentary on VFM arrangements which we set out for each criteria later in this section.




We also make recommendations where we identify weaknesses in arrangements or other matters that require attention from the Council. We refer to two distinct types of recommendation through the remainder of this report:

- **Recommendations arising from significant weaknesses in arrangements** - We make these recommendations for improvement where we have identified a significant weakness in the Council arrangements for securing economy, efficiency and effectiveness in its use of resources. Where such significant weaknesses in arrangements are identified, we report these (and our associated recommendations) at any point during the course of the audit.
- **Other recommendations** - We make other recommendations when we identify areas for potential improvement or weaknesses in arrangements which we do not consider to be significant but which still require action to be taken.

The table on the following page summarises the outcomes of our work against each reporting criteria, including whether we have identified any significant weaknesses in arrangements or made other recommendations.

VFM arrangements – Overall summary

Overall summary by reporting criteria

Reporting criteria		Commentary page reference	Identified risks of significant weakness?	Actual significant weaknesses identified?	Other recommendations made?
	Financial sustainability	11	No	No	No
	Governance	15	Yes – see page 16	Yes – see recommendations on page 22	No
	Improving economy, efficiency and effectiveness	18	No	No	No

VFM arrangements

Financial Sustainability

How the body plans and manages its resources to ensure it can continue to deliver its services

Significant weaknesses identified in 2022/23	Nil
Significant weaknesses identified in 2023/24	Nil



VFM arrangements – Financial Sustainability

Overall commentary on Financial Sustainability

Position brought forward from 2022/23

There are no indications of a significant weakness in the Council's arrangements for financial sustainability brought forward from 2022/23. Our review of relevant documents, reports and minutes did not suggest that underlying arrangements in relation to financial sustainability are significantly different in 2023/24.

Overall responsibilities for financial governance

The Council has a statutory duty to approve a balanced budget each year. Portfolio budget holders are then required to identify savings plans to reduce current expenditure, and these savings plans are subject to discussion and approval by finance. The Council sets an annual budget based on existing directorate budgets and priorities (i.e. prior year outturn rolled forward and adjusted for known changes at a service level). These are then reviewed to identify budget pressures/service priorities and external factors (e.g. new central government requirements).

As part of the process, Officers also undertake consultation with the local community to identify areas of spending priority. Once produced the draft budget is then discussed informally with members to identify further areas of service development or where expenditure may be cut.

We have conducted a review of the Council's overall governance framework, including Council and committee reports, the Annual Governance Statement, and the draft Statement of Accounts for 2023/24. This review has confirmed that the Council has fulfilled its responsibility to define the strategic aims and objectives, approve budgets, and monitor financial performance against budgets and plans to best meet the needs of the Council's service users.

Quarterly budget and financial monitoring reports are produced and reported to the Cabinet. Finance Managers work with Directorate Teams and Budget Holders to ensure that budget variances are explained, and appropriate corrective action taken.

Based on the above we are not concerned about the Council's ability to communicate accurate and timely management information. Arrangements for financial sustainability are in line with those expected of a district

council. We have not found any evidence that the Council is using unsustainable methods of relieving financial pressures or one-off accounting measures to meet year-end targets.

2023/24 Outturn and Reserves Position

We have reviewed the General Fund revenue outturn for 2023/24 as presented to Cabinet in July 2024, showing an underspend of £107,875 against the current approved Net Council Budget, equating to 0.77%. We reviewed the comparable report for 2022/23 presented to the Cabinet in July 2023, which showed a net underspend of £213,633 against the current approved Net Council Budget. We also analysed useable reserves per the financial statements show:

- General Fund balances of £13.517m at 31 March 2024 (£6.966m at 31 March 2023)
- Useable capital reserves of £2.1m at 31 March 2024 in (£6.9m at 31 March 2023)

The General Fund balance (both earmarked and unallocated reserves) has almost doubled on the prior year. Therefore despite depletion of Unapplied Capital Grants, the overall position is more resilient than in 2022/23 and the net underspend allows a contribution to reserves. It should however be noted that these figures are unaudited.

The Council's outturn position does not present a risk of significant weakness in arrangements

VFM arrangements – Financial Sustainability

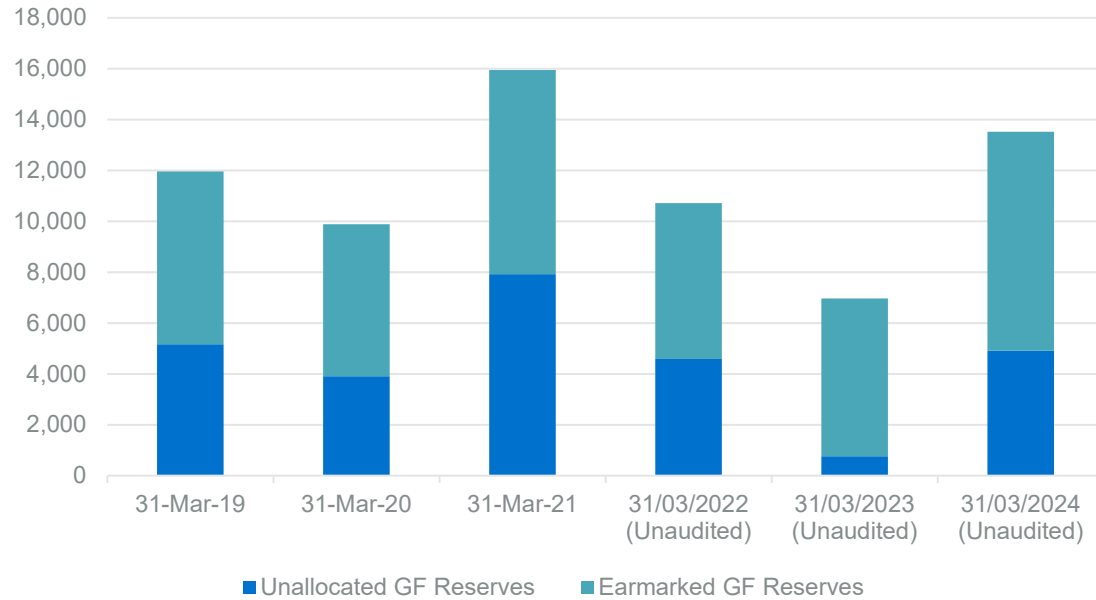
Overall commentary on Financial Sustainability - Continued

Financial sustainability and useable reserves

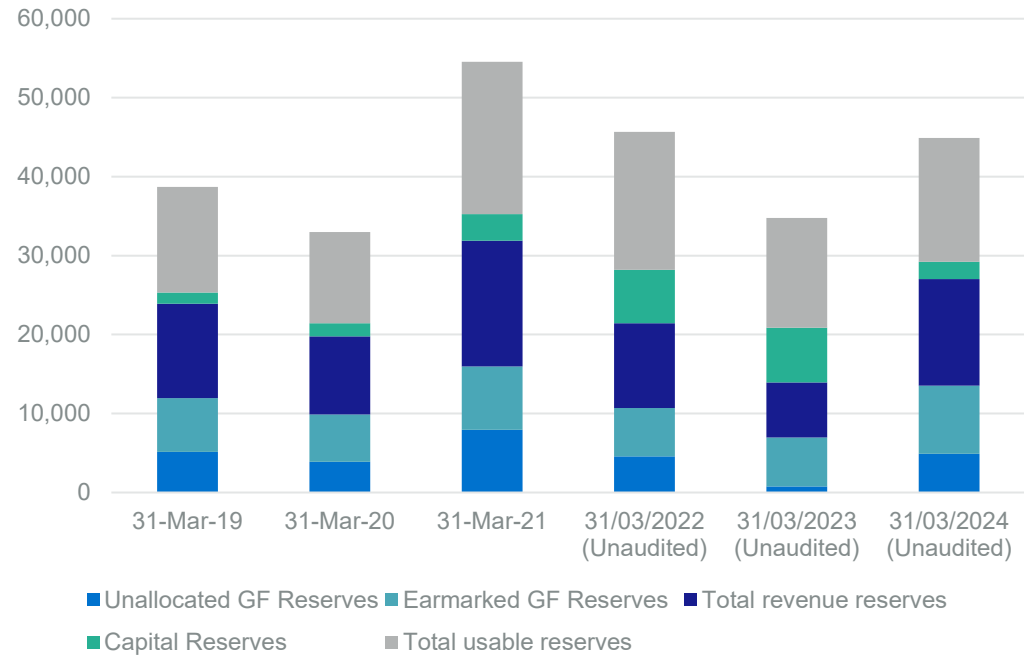
Through a review of the financial statements, we have considered the Council's reserves over time (see charts and table below).

The Council's reserves position does not give us cause for immediate concern in relation to a risk of significant weakness in arrangements to secure financial sustainability for the year ended 31 March 2024. Useable reserves were on a decline through to 31 March 2023 however this trend has not continued into 2023/24

Useable Revenue Reserves: Gedling Borough Council (£000s)



Total Useable Reserves: Gedling Borough Council (£000s)



VFM arrangements – Financial Sustainability

Overall commentary on Financial Sustainability - Continued

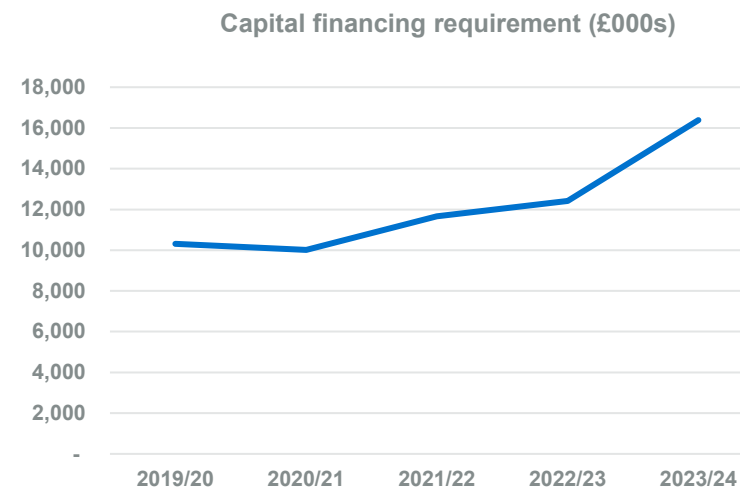
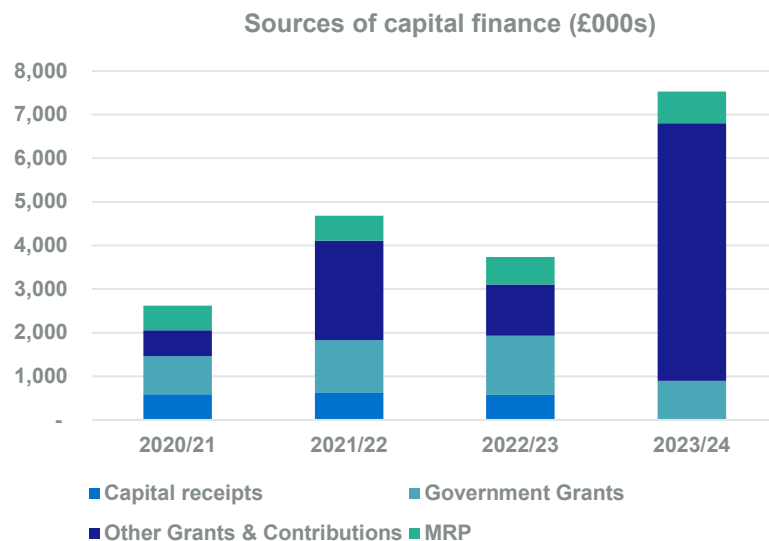
2023/24 Budget Setting and Medium Term Financial Plan

We have reviewed the budget setting process in respect of the 2023/24 financial year, including the Medium Term Financial Plan (MTFP), and have identified no concerns. The Constitution of the Council requires the Leader to present, before 21 February each financial year, a draft Budget and Performance Plan to the Cabinet for approval, highlighting budget priorities, growth items and proposed efficiencies. Through our review of committee reports and minutes we have confirmed that the General Fund Revenue Budget was presented to Cabinet by the SLT on 16th February 2023, demonstrating that adequate arrangements were in place for budget setting and management, reflecting changes. We did not identify evidence of a significant weakness in arrangements. The MTFP looks over a period of five years to identify medium term budget gaps. We have reviewed the 2024/25 MTFP noting that the covering report provides Members with details of key assumptions and uncertainties.

The Council's capital expenditure and financing

The Council's arrangements for setting and monitoring capital expenditure are consistent with those of the previous year and are deemed to be adequate.

We considered the Council's capital financing requirement (CFR) as set out in Note 12 of the 2023/24 Statement of Accounts which has gone from £10,313k in 2019/20 to £16,385k 2023/24, representing an increased need to borrow to finance capital expenditure. We also considered the sources of capital finance in the capital programme, which shows over the past five years capital spend has been mainly financed through grants and contributions. The MRP charge is 5.8% of the opening CFR in 2023/24 (5.5% in 2022/23) therefore is broadly stable from the prior year. We have not identified a risk of significant weakness in arrangements.



VFM arrangements

Governance

How the body ensures that it makes informed decisions and properly manages its risks

Significant weaknesses identified in 2022/23	Yes
Significant weaknesses identified in 2023/24	Yes – ongoing from prior year.



VFM arrangements – Governance

Risks of significant weaknesses in arrangements in relation to Governance

We have outlined below the risks of significant weaknesses in arrangements that we have identified as part of our continuous planning procedures, and the work undertaken to respond to each of those risks.

Risk of significant weakness in arrangements	Work undertaken and the results of our work
<p>Fraud & Internal Control: Allegations of fraudulent behaviour by Council Officers.</p> <p>As set out in our progress report from February 2023, Nottinghamshire Police are investigating an alleged case of "significant" fraud involving a Gedling Borough Council officer member. The alleged fraud was uncovered by the Council and reported to the police. We believe the allegations present a risk of significant weakness in the Council's arrangements for Governance (how the body ensures that it makes informed decisions and properly manages its risks).</p>	<p>Work undertaken</p> <p>Our work included, but was not limited to:</p> <ul style="list-style-type: none">• Reviewing relevant internal audit reports;• Regular discussions with Officers and Internal Audit and the police investigation team• Review of committee minutes and agendas. <p>Results of our work</p> <p>In October 2024, a former officer of the Council, who was dismissed in 2022, was found guilty of fraud by abuse of position and obtaining money transfers by deception over a period of nearly 19 years. The identified fraudulent transactions totalled almost £1m.</p> <p>In June 2023, we issued a progress report to the Council explaining that, whilst our work on the financial statements for the year ended 31 March 2022 was substantially complete, the identification of actual fraud meant we were unable to continue our work until the extent of the issue could be reasonably determined.</p> <p>Through our discussions with officers, we are aware that, on initial identification of the fraud, the Council took various action, including informing the police, introducing compensatory controls. In August 2022, the Council engaged forensic specialists to assess the situation and requested Internal Audit to review of the IT environment relating to financial controls. This latter review, which commenced in April 2023 and concluded in January 2024, highlighted a range of significant deficiencies in financial controls for the year ending 31 March 2024.</p> <p>We met with the internal auditors and reviewed the reports issued, confirming that, in March 2024, the Audit Committee received the Internal Audit report covering the review of Agresso IT Controls and the control weaknesses in the set-up of the finance system. From our meetings and review, we noted there were significant control deficiencies in relation to the segregation of duties and the privileged access given to this individual within the ledger system Agresso. These deficiencies have also hampered our ability to complete the financial statement audit.</p> <p>We also considered progress of the court case, including the ultimate conviction and sentencing in October 2024. In doing so, we considered whether the fraud losses were a risk to the Council's financial sustainability: overall, given the values involved and the steps taken, including further action, to reclaim funds, we are satisfied this does not present a risk of significant weakness in arrangements for financial sustainability.</p> <p>Conclusion</p> <p>In our view, the control deficiencies are indicative a risk of significant weakness in governance arrangements, including how the body monitors and assesses risk and how the body gains assurance over the effective operation of internal controls, including arrangements to prevent and detect fraud, that has led to a significant impact on the quality or effectiveness of the Council's reputation.</p>

VFM arrangements – Governance

Commentary on the Governance reporting criteria

Overall commentary on the Governance reporting criteria

The Council has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way it discharges its functions, having regard to a combination of effectiveness, economy and efficiency. In doing so, it is responsible for making proper arrangements for the governance of its affairs, the effective exercise of its functions and arrangements for the management of risk. The Council's core decision-making structure and arrangements are set out in detail within the Council's Constitution.

Our review of Council and Committee papers confirms that a template covering report is used for all reports, ensuring the purpose, implications, and recommendations are clear. Minutes are published and reviewed by Committees to evidence the matters discussed, challenge and decisions made.

Gedling's arrangements are broadly in line with expectations for a district council (with the notable exception of the weakness in arrangements brought forward from the prior year). The Council has adopted a local code of corporate governance which is consistent with the principles of the CIPFA/SOLACE Framework Delivering Good Governance in Local Government (2016). Through our review of minutes and committee reports we confirmed that a Code update was approved by the Audit Committee on 19th March 2024.

Financial Governance

The Council's Medium Term Financial Plan, which we confirmed was presented to Council on 6 March 2024 as part of the 2024/25 General Fund Revenue budget report, is subject to regular review and analyses the impact of income and expenditure. The Plan set future efficiency target of £3,558,900 with £833,700 identified and approved for delivery, with a further £500,000 expected from efficiencies identified through digital transformation.

Performance forecasts are monitored and assessments completed on an ongoing basis throughout the year. We did not identify any evidence of unreasonable assumptions or unachievable savings in the MTFP.

Risk Management Framework

The Council has established risk management and monitoring arrangements. The Council has also defined the level of risk exposure that it thinks is acceptable in its Risk Appetite Statement. The Council's Audit Committee is responsible for providing independent assurance to the Council on the adequacy of the risk management framework and internal control environment. We have reviewed evidence and confirmed that the Audit Committee meets regularly and reviews its programme of work to maintain a focus on key aspects of governance and internal control.

A new Risk Management Framework which includes a strategy, policy, risk appetite statement and a risk management toolkit was approved and adopted at Cabinet on 28 March 2024. We have reviewed the Corporate Risk Management Scorecard for Q4 2023/24 which notes the progress of actions identified within the Corporate Risk Register. While some higher priority risks are identified, none indicate a risk of significant weakness in arrangements.

Internal Control

The Three Lines of Defence Model is a commonly held evaluation of how organisations develop arrangements to support effective risk management and governance.

1. Operational management, including designing, operating, and implementing controls
2. Risk management and compliance functions, reporting to senior management
3. Internal audit, providing independent assurance and examination of controls, governance, and risk strategies

The Council's internal audit function is outsourced to BDO, who report to the Council, via the Audit Committee, on the adequacy and effectiveness of the internal control system. We have reviewed reports from the internal auditor including the Internal Audit Annual Report and Annual Statement of Assurance for 2023/24 (adopted by Cabinet in July 2024) as well as Internal Audit's confidential additional review on IT Agresso Controls from January 2024.

The 2023/24 overall Head of Internal Audit Opinion was moderate assurance, which demonstrates a significantly improved position for internal control and clear progress made against recommendations. However, as Internal Audit's review of the financial ledger (which highlighted significant deficiencies in the control environment, specifically referencing access rights) was issued in January 2024, we have concluded that the weakness in arrangements existed into the 2023/24 financial year.

Audit Committee

In our view, good governance forms the foundation of resilient and sustainable organisations and enhances stakeholder confidence.

The Council has an established Audit Committee and we have confirmed the Committee meets regularly and reviews its programme of work to maintain focus on key aspects of governance and internal control. We have attended Committee meetings and reviewed supporting documents and are satisfied that the programme of work is appropriate for the Council's requirements. Based on the work we have performed, the Committee is adequately serviced and attended by officers as required and there is evidence of challenge by members of the Committee.

VFM arrangements – Governance

Commentary on the Governance reporting criteria - continued

Arrangements for budget setting and budgetary control

The Council has an established set of arrangements in place for budget setting and control.

We have reviewed the Council's budget setting and medium-term financial planning, and our review is supported by discussions with officers during the year. The Council has an established set of arrangements in place for budget setting and control, and no matters have been identified indicating a significant weakness in arrangements.

We read the report to Council in March 2024 where a balanced budget was set. We are satisfied that the reports contain an adequate amount of detail regarding assumptions, including pay and inflation, and that these assumptions are not unreasonable.

We have reviewed minutes of meetings and the Cabinet Report from January 2025, where members were informed that the General Fund outturn is projected to be in line with the approved net revenue budget of £14.9m. This also sets out that the level of efficiency savings of £0.8m has been reduced to £0.6m, which we do not believe presents a significant risk to governance or financial sustainability.

VFM arrangements

Improving Economy, Efficiency and Effectiveness

How the body uses information about its costs and performance to improve the way it manages and delivers its services

Significant weaknesses identified in 2022/23	Nil
Significant weaknesses identified in 2023/24	Nil



VFM arrangements – Improving Economy, Efficiency and Effectiveness

Overall commentary on Improving Economy, Efficiency and Effectiveness

Position brought forward from 2022/23

As detailed in the table above, there are no indications of a significant weakness in the Council's arrangements carried over from the previous year. Furthermore, we do not believe that the significant weakness identified in relation to governance will have an impact on this reporting area, as it does not affect headings such as partnerships or performance management.

Performance management

The Council maintains a 'Gedling Plan' (refreshed for 2024-2027) against which performance is monitored against the key priorities of Economy, Community, Place and The Council. Each of the areas have a detailed delivery plan in place with specific indicators to measure success. The Council produces an annual report that summarises key achievements and performance measures against the Plan that is approved by Cabinet each year.

We have reviewed the 2023/24 report presented to Cabinet by the SLT on 17th July 2024: in addition to the 30 performance indicators monitored on a quarterly basis, there are 13 indicators reported on an annual basis. Overall performance is positive, with 24 of the indicators either meeting or exceeding target. Two were slightly below target, and only two indicators missed their target. We do not consider these areas to represent a risk of significant weakness. The remaining 15 were tracking indicators. It's noted that for all of the areas an action plan has been developed, with measurable success criteria and an indicator of direction of travel. This allows the Council to monitor successful delivery and identify any areas where corrective action is required.

Peer review and external regulators

The Local Government and Social Care Ombudsman (LGSCO) is the independent body responsible for investigating complaints made against public bodies where it is alleged there has been maladministration causing injustice. In their Annual Review Letter dated 17th July 2024 (presented to Cabinet in October 2024) we noted that of the complaints determined by the LGSCO in 2023/24, only one progressed to formal investigation. This one investigation resulted in the complaint not being upheld. As a result, the percentage of complaints upheld for the Council is 0%. We do not consider this to represent a risk of significant weakness in arrangements.

Following the LGA Corporate Peer Challenge (CPC) which the Council was subject to in June 2022, a

Progress Review took place during 2023/24 in November 2023. The report, along with associated action plan, was reported to Cabinet in March 2024. This demonstrates that the Council has arrangements in place to engage in feedback and review in relation to a number of aspects of the Council's functions, from local partnerships to member engagement.

Procurement

The Council has a Procurement Strategy which outlines how the procurement of goods, works and services is achieved. These documents provide a corporate framework for the procurement of goods, works and services. There are also controls in place designed to ensure that all procurement activity is conducted with openness, honesty and accountability.

From our consideration of the above we did not identify evidence of a significant weakness in arrangements.

VFM arrangements

Identified significant weaknesses in arrangements and our recommendations



VFM arrangements - Identified significant weaknesses and our recommendations

Identified significant weaknesses in arrangements and recommendations for improvement

As a result of our work we have identified significant weaknesses in the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources. These identified weaknesses have been outlined in the table below and will be finalised in our audit report.

Identified significant weakness in arrangements	Financial sustainability	Governance	Improving the 3Es	Recommendation for improvement	Our views on the actions taken to date
<p>Fraud and Internal Control</p> <p>In October 2024, a former Council Officer, who was dismissed in 2022, was found guilty of fraud by abuse of position, to the value of nearly £1m.</p> <p>When the fraud was identified in July 2022, the Council took various actions which included informing the police, and, in August 2022, engaging forensic specialists to assess and report on the situation. The Council also directed Internal Audit to examine the IT environment and identify financial controls and/or governance processes within the Council's control environment that require improvement to reduce and mitigate risk. This Internal Audit review commenced in April 2023 and concluded in January 2024 and highlighted a range of significant deficiencies in controls including, but not limited to, privileged user access and payment controls for the year ending 31 March 2024 and made recommendations for improvement.</p> <p>The significant deficiencies noted by Internal Audit are evidence of a significant weakness in the Council's governance arrangements, specifically how the Council monitors and assesses risk and how the Council gains assurance over the effective operation of internal controls, including arrangements to prevent and detect fraud.</p>		●		<p>The Council should:</p> <ul style="list-style-type: none"> • continue to implement all remaining recommendations raised by Internal Audit to address all aspects of the control environment that were found to be deficient; • ensure that arrangements to test the effectiveness of internal controls on a periodic basis, including any adjustments for changes in systems or processes that may have occurred are in place; and • ensure lessons learned are applied as part of its 2024-2027 Digital, Data and Technology Strategy 	<p>The Council's action to reduce privileged access was an adequate immediate step, with further work to do to redefine wider roles across the ICT infrastructure.</p> <p>In our view this is a commensurate response to the weaknesses identified, as well as closing off issues and adding compensatory controls, it also allows the Council to contribute towards its longer-term plan.</p>

Other reporting responsibilities

Other reporting responsibilities

Other reporting responsibilities

Matters we report by exception

The Local Audit and Accountability Act 2014 provides auditors with specific powers where matters come to our attention that, in their judgement, require specific reporting action to be taken. Auditors have the power to:

- issue a report in the public interest;
- make statutory recommendations that must be considered and responded to publicly;
- apply to the court for a declaration that an item of account is contrary to the law; and
- issue an advisory notice.

We have not exercised any of these statutory reporting powers.

The 2014 Act also gives rights to local electors and other parties, such as the right to ask questions of the auditor and the right to make an objection to an item of account. We did not receive any such objections or questions.

Reporting to the NAO in respect of Whole of Government Accounts consolidation data

We are awaiting information from the NAO before being able to complete our return.

Appendix A: Further information on our audit of the Council’s 2023/24 financial statements

Significant risks and audit findings

As part of our audit of the Council, we identified significant risks to our opinion on the financial statements during our risk assessment. The table below summarises these risks, how we responded and our findings.

Risk	Our audit response and findings
Significant Risk 1 Management override of control	Due to the date of the backstop, we were unable to provide any assurance over the areas of risks we have identified.
Significant Risk 2 Defined benefit liability valuation	Due to the date of the backstop, we were unable to provide any assurance over the areas of risks we have identified.
Significant Risk 3 Valuation of land and buildings, investment properties and council dwellings	Due to the date of the backstop, we were unable to provide any assurance over the areas of risks we have identified.

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