



Grant Thornton UK LLP
Level 8
110 Queen Street
Glasgow
G1 3BX

25 November 2021

Dear Joanne

The Highland Council
Financial Statements for the year ended 31 March 2021

This representation letter is provided in connection with the audit of the financial statements of The Highland Council and its subsidiary undertakings, High Life Highland, Nairn Common Good Fund, and Inverness Common Good Fund for the year ended 31 March 2021 for the purpose of expressing an opinion as to whether the Group and Council financial statements are presented fairly, in all material respects in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 and applicable law.

We confirm that to the best of our knowledge and belief having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

Financial Statements

- i. We have fulfilled our responsibilities for the preparation of the group and Council's financial statements in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 ("the Code"); in particular the financial statements are fairly presented in accordance therewith.
- ii. We have complied with the requirements of all statutory directions affecting the group and Council and these matters have been appropriately reflected and disclosed in the financial statements.
- iii. The Council has complied with all aspects of contractual agreements that could have a material effect on the Group and Council financial statements in the event of non-compliance. There has been no non-compliance with requirements of any regulatory authorities that could have a material effect on the financial statements in the event of non-compliance.
- iv. We acknowledge our responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.
- v. Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable. Such accounting estimates include valuation of property, plant and equipment, depreciation, valuation of investment property (Common Good), valuation of heritage assets, impairment of debtors (comprising long term debtors, non-taxation debtors and taxation debtors), fair value of financial instruments, holiday pay accrual, non-pay expenditure accruals, accrued income, valuation of defined benefit pension scheme liabilities and PFI/PPP liabilities. We are satisfied that the material judgements used in the preparation of the financial

statements are soundly based, in accordance with the Code and adequately disclosed in the financial statements. We understand our responsibilities includes identifying and considering alternative, methods, assumptions or source data that would be equally valid under the financial reporting framework, and why these alternatives were rejected in favour of the estimate used. We are satisfied that the methods, the data and the significant assumptions used by us in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in accordance with the Code and adequately disclosed in the financial statements.

- vi. We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme assets and liabilities for IAS19 Employee Benefits disclosures are consistent with our knowledge. We confirm that all settlements and curtailments have been identified and properly accounted for. We also confirm that all significant post-employment benefits have been identified and properly accounted for.
- vii. Except as disclosed in the group and Council financial statements:
 - a. there are no unrecorded liabilities, actual or contingent
 - b. none of the assets of the group and Council has been assigned, pledged or mortgaged
 - c. there are no material prior year charges or credits, nor exceptional or non-recurring items requiring separate disclosure.
- viii. Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards and the Code.
- ix. All events subsequent to the date of the financial statements and for which International Financial Reporting Standards and the Code require adjustment or disclosure have been adjusted or disclosed.
- x. We have considered the unadjusted misstatements schedule included in your Audit Findings Report and attached. We have not adjusted the financial statements for these misstatements brought to our attention as they are immaterial to the results of the Council and its financial position at the year-end. The financial statements are free of material misstatements, including omissions.
- xi. Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards.
- xii. We believe the allocation of covid-19 funding receipts and payments between the Council acting as principal and as agent has been appropriately reflected in the financial statements in accordance with the Code.
- xiii. We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements.
- xiv. We have considered the financial results and balances held in Highland Opportunity Limited, Eden Court Highlands, Tain, Dornoch, Cromarty and Invergordon Common Good Funds and the Council's Charitable, Educational and Other Trust Funds and are satisfied that these are not material to the Group and therefore have been excluded from the Group Accounts.
- xv. We have updated our going concern assessment and cashflow forecasts in light of the Covid-19 pandemic. We continue to believe that the Group and Council's financial statements should be prepared on a going concern basis and have not identified any material uncertainties related to going concern that current and future sources of funding or support will be more than adequate for the Council's needs. We are satisfied that there is no intention by the Government to discontinue the Council's operations or transfer functions outwith the public sector.
- xvi. We believe that no further disclosures relating to the Group and Council's ability to continue as a going concern need to be made in the financial statements

Information Provided

- xvii. We have provided you with:
 - a. access to all information of which we are aware that is relevant to the preparation of the Group and Council's financial statements such as records, documentation and other matters;
 - b. additional information that you have requested from us for the purpose of your audit; and
 - c. access to persons within the Council via remote arrangements, in compliance with the nationally specified social distancing requirements established by the Government in response to the Covid-19 pandemic from whom you determined it necessary to obtain audit evidence.
- xviii. We have communicated to you all deficiencies in internal control of which management is aware.
- xix. All transactions have been recorded in the accounting records and are reflected in the financial statements.
- xx. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- xxi. We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the Group and Council, and involves:
 - a. management;
 - b. employees who have significant roles in internal control; or
 - c. others where the fraud could have a material effect on the financial statements.
- xxii. We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, analysts, regulators or others.
- xxiii. We have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.
- xxiv. We have disclosed to you the identity of the Group and Council's related parties and all the related party relationships and transactions of which we are aware.
- xxv. We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

Remuneration report

- i. We are satisfied that the disclosures within the Remuneration Report are complete and accurate and have been prepared in accordance with the Local Authority Accounts (Scotland) Regulations 2014.

Annual Governance Statement

- ii. We are satisfied that the Annual Governance Statement (AGS) fairly reflects the Council's risk assurance and governance framework and we confirm that we are not aware of any significant risks that are not disclosed within the AGS.

Narrative Report

- iii. The disclosures within the narrative report fairly reflect our understanding of the group and Council's financial and operating performance over the period covered by the financial statements.

Approval

The approval of this letter of representation was minuted by the Council's Audit and Scrutiny Committee at its meeting on 25 November 2021.

Yours faithfully

Name.....

Position...Executive Chief Officer – Resources and Finance

Date.....

Signed on behalf of The Highland Council

Appendix 1 – Unadjusted audit differences 2020/21 reported in our Annual Report to Members

Detail	Comprehensive Income and Expenditure £'000	Balance Sheet £' 000
Adjustment to fully recognise year end creditors balance (and remove uncleared BACS balance)		7,678
Dr Short term creditors – trade payables		(7,678)
Cr Cash and cash equivalents		
Being the impact of the use of actual total assets of the pension fund at the year end date compared with the estimates on the employer body liability.		6,348
Dr Pension liability	(6,348)	
Cr Pension reserve		
Being the reversal of internal developer contributions found within substantive testing at <Fees and charges income>	262	
Dr Service Income	(262)	
Cr Service Expenditure		
Being the correction of insurance fund debtor recognised		
Dr Service Income	272	
Cr Insurance fund debtor		(272)
Overall impact	(6,076)	6,076

Appendix 1 – Unadjusted audit differences 2019/20 reported in our Annual Report to Members

Detail	Comprehensive Income and Expenditure £'000	Statement of Financial Position £' 000
Adjustment to reflect correct school measurements that should have been used in 2019/20		
Dr Other land and buildings		4,177
Cr Revaluation reserve		(4,177)
Adjustment to reflect missing school valuation from 2019/20 valuation exercise		
Dr Revaluation reserve		2,359
Cr Other land and buildings		(2,359)
Adjustment to correct typo identified in relation to 2019/20 valuation exercise		
Dr Other land and buildings		2,586
Cr Revaluation reserve		(2,586)
Overall impact	-	-