

Tonbridge and Malling Borough Council

Audit progress report and sector updates

July 2025



Agenda

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Audit progress report

Introduction

This paper provides the Audit Committee with a report on progress in delivering our responsibilities as your external auditors.

The paper also includes a series of sector updates in respect of emerging issues which the Committee may wish to consider.

Members of the Audit Committee can find further useful material on our website, where we have a section dedicated to our work in the public sector. Here you can download copies of our publications:

<https://www.grantthornton.co.uk/industries/public-sector/local-government/>

If you would like further information on any items in this briefing or would like to register with Grant Thornton to receive regular email updates on issues that are of interest to you, please contact either Sophia or Bheki.



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Progress as at June 2025

An overview of audit progress to date:

- **2024-25 – Audit planning stage**

We undertook our initial audit planning work during the months of February to March 2025. In April 2025 we issued an indicative audit plan, setting out our proposed approach to the audit of the Council's 2024-25 financial statements. We will update Audit Committee at the July 2025 meeting whether we have identified any additional risks to the 2024-25 audit in completing our planning procedures, or if we can finalise the plan issued in April 2025.

- **2024-25 – Fieldwork stage**

We started our final audit fieldwork visit in mid-June 2025 and work is planned for completion in September 2025. We completed interim work in April 2025, selecting and auditing key samples. We received the draft 2024-25 statements of accounts for audit on 30 May 2025, and have now received the supporting working papers to the accounts to progress our fieldwork audit. A summary is included on the next page covering our audit progress in key areas.

- **2024-25 – Planned audit completion**

We plan to complete and report our work in the Audit Findings Report, presenting to Audit Committee on 29 September 2025. We intend to give our opinion on the 2024-25 Statement of Accounts following the Audit Committee meeting and by the statutory deadline of 30 September 2025. To date, we have no matters to report.

- **2024-25 – Value for Money work**

Our VFM planning procedures and mobilisation of the work commenced in April 2025. The delivery of the final Auditor's Annual Report will be reported at the Audit Committee meeting on 29 September 2025. To date, we have no matters to report.

Progress as at June 2025

The table below summaries progress in key audit areas as of June 2025. Our aim is to substantially complete the work on planning areas over July 2025 and fieldwork areas ahead of our planned completion in September 2025.

Audit work	Audit comments
Understanding key business processes and accounting estimates	We are required to obtain an understanding of key business processes and the relevant controls, and key accounting estimates made in preparing the accounts. While we have completed work on key business processes and accounting estimates, we are yet to complete our understanding of the Council's processes related to IFRS 16 – Leases.
Understanding IT environment – processes and information	We are required to obtain an understanding of key IT systems at the Council. This work is in progress with discussions ongoing with management to conclude it.
Expenditure (including payroll) and Fees & charges interim audit work	We selected samples of expenditure and fees & charges income transactions during our April interim visit. We processed evidence received and raised follow-up queries. Work is progressing well, and audit team is finalising the interim testing.
Property, Plant and Equipment asset verification	We selected samples for asset existence verification during our April interim visit. No issues were noted, and audit team will finalise work on one remaining item in July 2025.
Actuary and asset valuation experts' reports	Our work on property, plant and equipment assets and pension liability valuations is considered significant. We have received all reports necessary to start our work and reports are under review. We have sent our initial queries to the external valuers as part of our procedures and expect responses in July 2025.
Cash & bank and Investments	We requested third party confirmations from City Fund's counterparties in relation to all bank accounts and investments held; we have received all responses to date and audit team is processing the confirmations.
Other sampling areas of the audit	Our work on sampling at final audit visit is ongoing. To date we have sampled key areas of the audit including debtors, creditors, unrecorded liabilities and grants. Our aim is to finalise all sampling areas in early July 2025.

Progress as at June 2025

Key audit milestones

Financial statements audit

Key dates for the delivery of the financial statements audit:

- Issue our draft Audit Findings Report (AFR) in **September 2025**.
- Issue the audit opinion for the financial statement audit by **30 September 2025**.

Events

We provide a range of workshops and network events.

On 4 June 2025 we held a webinar providing updates on local government re-organisation and devolution; and lessons from our 2023-24 value for money audits. A recording of the event is available below:

[Audit Committee webinar](#)

Value for Money

The key dates for delivering our value for money work are as follows:

- Draft Auditor's Annual Report (AAR) to be shared with management for comments in early **September 2025**.
- Final AAR to be presented to Audit Committee on **29 September 2025**.

Audit deliverables

Below are some of the audit deliverables planned for 2024-25

2024-25 Deliverables	Planned date	Status
Audit Plan We are required to issue a detailed audit plan to the Audit Committee setting out our proposed approach in order to give an opinion on the Council’s 2024-25 financial statements.	April 2025	Complete
Audit Findings Report The Audit Findings Report will be reported to the Audit Committee on 29 September 2025.	September 2025	Not yet due
Auditor’s Report This includes the opinion on your financial statements, to be issued by 30 September 2025.	September 2025	Not yet due
Auditor’s Annual Report This report communicates the key outputs of the audit, including our commentary on the Council's value for money arrangements.	September 2025	Not yet due

Logistics



Sector updates

Local audit reform

On 9 April 2025, the government published [Local audit reform: Government response to the consultation to overhaul local audit in England - GOV.UK](#)

Recognising that a backlog in local audit sign-off of nearly 1,000 audits had impacted local accountability and transparency, the purpose of the consultation was to rebuild a system of local audit, ensuring that audited accounts are published on time, and that trust and confidence in how councils are spending their money is restored. Grant Thornton welcomes the reforms which we believe are much needed.

The key outcome of the consultation is the decision to proceed with the establishment of a new Local Audit Office (LAO) with effect from 1 April 2026.

Local Audit Office – core principles

Value for money: Providing confidence for stakeholders that proper arrangements are in place.

Transparency of the sector's financial health and VfM arrangements.

Capacity and capability: A sustainable and resilient audit market with access to the right expertise.

External scrutiny which challenges and drives improvement.

Professionalism: Building a sector attractive to auditors.

Proportionality: Local audit that is proportionate and relevant, from regulations to governance.

Stronger accountability: High standards of financial reporting to promote public accountability.

Timely: High quality accounts which are produced on a timely basis.

Impact for local authorities

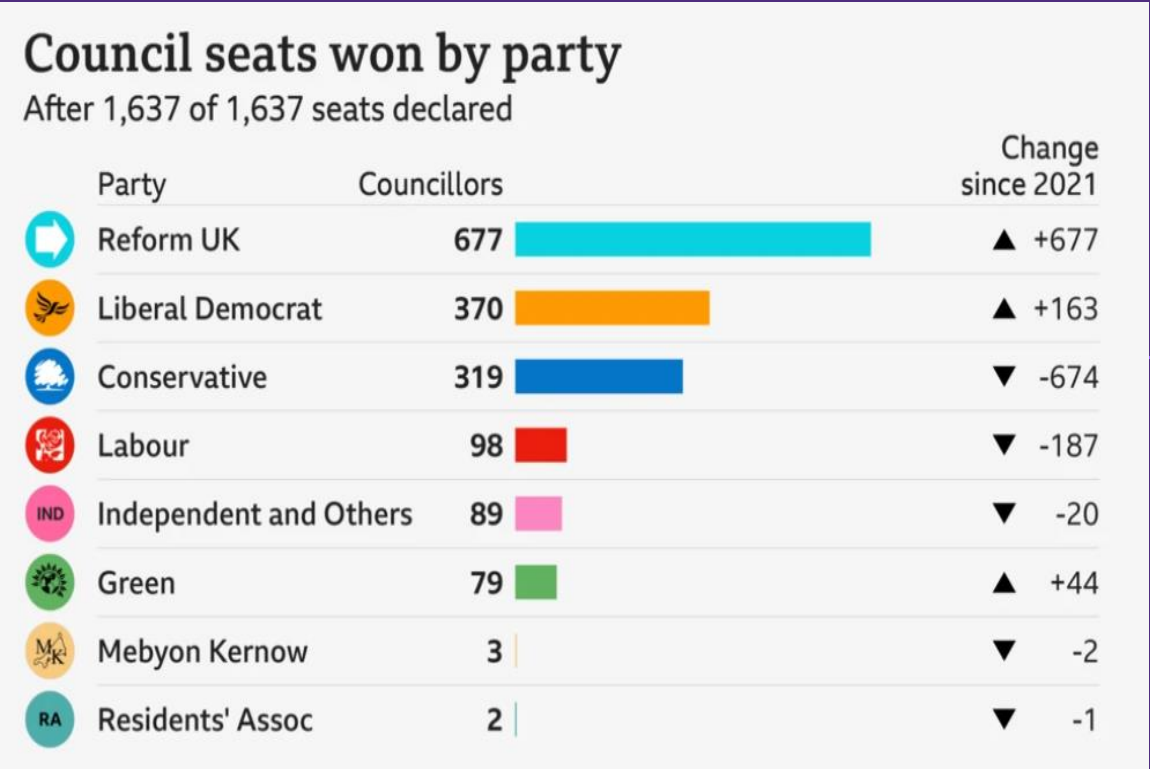
- A mandatory requirement for at least one independent Audit Committee member at each authority.
- Mandatory reporting of the Auditor's Annual Report to full Council.
- The introduction of a Local Public Accounts Committee, following the central government model.
- The strengthening of Internal Audit capacity.

New members and the 30th anniversary of Nolan

The May 2025 local elections saw significant turnover in membership at some councils. The elections saw 677 new Reform councillors become members of local government for the first time, and 674 former Conservative councillors leave local government, often after many years of service. The extent of the changes meant that when the LGA’s political proportionality was recalculated on 8 May 2025, Reform was awarded its own LGA Group for the first time.

Reform, the Liberal Democrats, and the Green party all gained new councillors, many new to local government roles.

Coincidentally, May 2025 marks the 30th anniversary of the Nolan Principles. As the large number of new councillors get to grips with the challenges the local government sector faces, and the unique opportunities presently before it, there is probably no better star they can be guided by. By practicing selflessness, integrity, objectivity, accountability, openness, honesty and leadership, councillors of all political persuasions (and none) should be able to work together in the best interest of the areas they have been elected to represent.



Source: BBC News [Local elections 2025: results in maps and charts](#)

Challenges faced by local authorities in implementing IFRS 16 (1)

IFRS 16 is an international accounting standard that changes how leases are reported in financial statements. It requires organisations to bring most leases onto the balance sheet, recognising both a right-of-use asset (the value of the leased item) and a lease liability (the obligation to make future lease payments). This change improves transparency by more comprehensively reporting the extent of an organisation's leasing commitments on the balance sheet. It replaces the previous distinction between operating and finance leases for lessees under IAS 17.

In the UK public sector, IFRS 16 is adopted through the CIPFA Code of Practice on Local Authority Accounting. After several deferrals, it is now mandatory for local authorities from 1 April 2024, impacting the 2024-25 financial year.

As local authorities prepare their 2024-25 financial statements and apply IFRS16 for the first time, several areas are proving particularly challenging. These challenges are not just technical — they have implications for governance, transparency, and the accuracy of financial reporting. The Audit Committee plays a key role in providing oversight and assurance. The table below sets out some areas which can present difficulties, along with suggested questions for finance teams and Audit Committees to consider.

Area of difficulty	Description	Challenge questions to ask the Finance team
Completeness of lease records	One of the most fundamental requirements of IFRS 16 is that all lease arrangements must be identified and recorded. This includes not only formal lease contracts but also informal or embedded leases that may be part of broader service agreements. Many authorities conducted a one-off review of leases as they prepared for the transition but without ongoing processes, there is a risk that new leases entered into during the year may not be captured. This could result in incomplete or inaccurate entries in the financial statements.	(a) How does the finance team ensure that all lease agreements, including those entered after the initial review, are identified and properly recorded? (b) What approach does the finance team take to work with other departments in identifying and reporting lease arrangements, especially those that might be informal or embedded in other contracts? (c) What processes or controls are in place to keep the lease register accurate and up to date throughout the year?

Challenges faced by local authorities in implementing IFRS 16 (2)

Area of difficulty	Description	Challenge question to ask the Finance team
Holdover leases (expired leases still in use)	In some cases, a property lease agreement may have ended but the authority continues to occupy and use the premises. These are known as holdover leases. The challenge here is determining whether the continued use of the asset creates a new lease under IFRS 16. This depends on whether there are still enforceable rights and obligations between the authority and the landlord. Making this assessment often requires legal judgment and careful documentation. The most challenging aspect of holdover leases is determining the lease term. Management must consider whether there is an implied contract, the term of the arrangement, and whether there are any continuing enforceable rights or obligations, as well as any significant costs or penalties from terminating the arrangement.	(a) Have any holdover leases been identified, and how has the finance team assessed whether these should be treated as leases under IFRS 16? (b) Where there was uncertainty, has legal advice been sought, and are the assumptions and judgments clearly documented? (c) What approach has been taken to determine the lease term for agreements that are open-ended or automatically renew?
Peppercorn or nominal rent leases	Some leases involve little or no payment — for example, a community building leased for £1 per year. These are known as peppercorn leases. Even though the payments are minimal, IFRS 16 requires the authority to recognise a right-of-use asset on its balance sheet at fair value. This can be difficult, especially if there is no recent valuation or if the asset is unique.	(a) Have any lease arrangements been identified where the payments are nominal or zero? If so, how have these been assessed under IFRS 16? (b) What process has been followed to determine the fair value of the right-of-use assets in these cases? (c) Is there sufficient documentation and evidence to support the valuation approach taken?

Challenges faced by local authorities in implementing IFRS 16 (3)

Area of difficulty	Description	Challenge question to ask the Finance team
Lease modelling and use of external advisors	Some authorities have relied on external advisors to calculate the lease liabilities and right-of-use assets required under IFRS 16. While this can be helpful, it has created challenges where the advisors have not provided the underlying data or assumptions used in the calculations. Without this information, it becomes difficult for the finance team to explain or support the figures in the accounts.	(a) Have external advisors been involved in the lease accounting process, and if so, do they have access to the detailed inputs and assumptions used in the calculations? (b) Can the finance team fully explain and support the lease figures presented in the financial statements? (c) What documentation and internal checks are in place to ensure the accuracy and completeness of lease calculations and disclosures?
Variable lease payments linked to indices or rates	Some lease payments vary based on inflation or other financial indices. For example, a lease might include annual increases linked to the Consumer Prices Index (CPI). Under IFRS 16, the authority must estimate future payments based on known changes to these indices. This requires careful judgment and can affect the accuracy of the lease liability recorded.	(a) How has the finance team addressed lease arrangements that include variable payments? (b) Have known changes to inflation rates or other relevant indices been factored into the lease calculations, and how has this been documented?
Group leases and consolidation	In some cases, leases exist between a council and its wholly owned subsidiary, or arrangements between a police and crime commissioner and the chief constable may in some circumstances meet the definition of a lease. These leases must be included in the individual accounts and then adjusted on consolidation. This can be complicated, especially if different entities within the group use different accounting standards.	(a) How has the finance team identified and accounted for lease arrangements between group entities? (b) What steps have been taken to align accounting policies in preparing group accounts? (c) How are intra-group leases treated in the consolidated financial statements, and what documentation supports this treatment?

Reorganisation update

March 2025

Twenty-one two tier areas were invited by the Minister of State for Local Government and English Devolution to submit interim plans for reorganisation by 21 March 2025. Councils were asked to **“make every effort to work together to develop and jointly submit one proposal”** for each area. Finding the consensus necessary to achieve this has been a challenge though.

The Local Government Chronicle reports that the Minister received in reply at least 40 separate local government reorganisation (LGR) interim plan submissions; outlining across the replies at least 53 separate LGR options. From the replies, none of the 21 areas had agreed a final geography for new unitary councils.

May 2025

Surrey was asked to submit its final proposal for reorganisation by 9 May 2025. Again though, consensus has not been achieved. The County Council put forward a final proposal for two unitaries on 30 April 2025; and one of the prominent borough councils put forward a final proposal for three unitaries a week or so later.

With so little consensus at this stage, moving to next steps may be difficult.



Expected next steps

26 September 2025 – Deadline for areas in the Devolution Priority Programme to submit final proposals for reorganisation.

28 November 2025 – Deadline for all other areas to submit final proposals for reorganisation.



Recommended reading

For these challenging times, three sets of material from Grant Thornton may be useful:

September 2024 - [Learning from the new unitary councils](#)

March 2025 - [Navigating the future: The dual challenge of local Government reorganisation and devolution | Grant Thornton](#)

March 2025 - [Dual delivery - How can areas successfully reorganise local government and implement devolution at the same time?](#)

Homelessness

In May 2025, a new report by the Institute for Government highlighted how local authority spending on homelessness has nearly trebled in real terms over the last 14 years, and yet the number of homeless people has continued to rise, now reaching record proportions.

Local authority spending on homelessness in real terms (2024-25 prices):

- 2010-11: £1.3 billion
- 2024-25: £3.1 billion

Local authority median spend on homelessness as a % of all median spend:

- 2010-11: 18%
- 2023-24: 54%

Changes in the level of homelessness:

- 2010-11 to 2024-25: More than doubled.
- September 2024: 126,040 households living in temporary accommodation.

The Institute for Government (IFG) highlights that we need to focus not just on how much is spent, but also on what we spend it on. Local authorities often end up spending most of their budget, plus homelessness prevention grants and rough sleeper grants, on acute responses to homelessness. These are often exorbitantly expensive and come at the cost of underlying prevention work. IFG suggests also that individual local authorities work at too small a scale to tackle the extent of the homelessness problem – and that stronger place-based approaches are needed.

A recent report by the [Local Government Chronicle](#) looks at a similar issue through a different lens, suggesting that stronger investment in counter fraud would help slash some of the escalating spend on temporary accommodation.

Although they come at the issue of spend on homelessness from different angles, both reports indicate that challenging **how** the budget is spent, **and on what**, is more important than simply asking what the budget is.



Making decisions

With so much changing in local government, and across the UK economy, making good decisions has perhaps never been more important. Two recent major publications on decision-making for mayoral combined authorities and public sector mega-projects both include content that may be useful for strategic and complex decision-making at other levels of government.

Strategic decision-making

The Institute for Government published advice in March 2025 on [“How the government can support better decision making in mayoral combined authorities”](#).

To enhance capacity and accountability for strategic decisions, councils need to:

- Provide good technical and administrative resource to ensure that the plans members are voting on are well designed.
- Consider utilising digital tools for community engagement.
- Embed participatory processes, including peer research projects, to inform and support policy making.



Complex decision-making

The National Audit Office published a report in March 2025 on [Lessons learned: Governance and decision-making on mega-projects](#).

To improve decision-making for the most complex projects, councils need to:

- Adopt governance arrangements that reflect the main risks to delivery and to achieving value for money.
- Map out the decision pathway, setting out which decisions will need to be made when, and by whom.
- Ensure those charged with governance over complex projects have the skills, qualification and experience needed to make decisions on the projects.



Housing targets and housing enquiry

Figures from the [Office for Budget Responsibility](#) on 26 March 2025 indicate that changes to the planning system mean that housebuilding is at a 40-year high and that 1.3 million new homes will be built across the UK by the end of this decade.

Provisional figures from [Homes England](#) on 20 May 2025 suggest that the agency exceeded its overall targets for new housing starts and completions in 2024-25, for the second year running.

Nevertheless, the government continues to look at even more new ways of opening-up housebuilding and development activity. The UK parliament is now calling for evidence from anyone who can contribute to an enquiry around the effectiveness of the current system for developer contributions.

In 2022-23, some 44% of affordable housing was provided through Section 106 agreements. Parliament wants to consider whether:

- The current system is understandable and accessible to stakeholders;
- Local Planning Authorities are receiving the correct support from MHCLG to ensure they can efficiently and effectively collect and spend developer contributions;
- The Ministry of Housing, Communities and Local Government's (MHCLG's) oversight of the system is effective; and
- MHCLG can learn and apply lessons to the process.

A [National Audit Office](#) report on the Section 106 system is due out in the summer.



Complaints data from the Local Government and Social Care Ombudsman



Local Government &
Social Care
OMBUDSMAN

Annual 2024-25 complaints statistics have just been published for each council by LGSCO: [Your council's performance](#).

This is an earlier publication date for the statistics than in other years – because the Ombudsman is responding to requests that the timetable be made to fit better with council complaint reporting cycles. LGSCO has also responded to council requests by including absolute numbers in the data, so that the emphasis is shifted away from percentages (in upheld, satisfactory remedies and compliance) and better context is given.

A very clear traffic light rating system has been adopted – and both councils and residents will be able to see immediately how well their area fares.

Complaints data is an important tool for judging where energy needs to be directed for risk and performance management. Context and proportion are important as well though for judging overall performance; and earlier data is generally more useful than later data. The improvements made this year to timing and presentation will help councils and their members make the most of the valuable resource that LGSCO provides.

Climate change – new role for the Energy Ombudsman

The Energy Ombudsman took on a new role on 1 April 2025, as the official dispute resolution body for Great Britain's heat network customers.

The [Association for Decentralised Energy \(ADE\)](#) estimates that heat networks, are projected to unlock £100 billion in UK infrastructure investment by 2050, while at the same time cutting carbon emissions. The sector is poised to play a central role in the UK's net-zero transition.

ADE estimates that most consumers are happy with the experience they have of using heat networks. Nevertheless, having an official ombudsman role boosts the credibility of the industry.

As major providers in the field, councils do need to be aware of the new dispute resolution arrangements. The Ombudsman invited providers to register with them in the run up to 1 April. Anyone who has not done so yet, should register now so that they can keep abreast with the changes ongoing.

Register here: [Join our Heat Network Supplier scheme | Energy Supplier Portal](#)



Climate change – new report on generating hope

Great British Energy recently announced £10 million of funding for a local government partnership to build clean energy power.

We know that each mayoral strategic authority in England will be invited to apply for a share of the funding, but there is little other detail available yet.

Localis have shared thoughts on how Great British Energy and the metro mayors can build clean power in every part of the country, starting with four simple steps:

- Provide robust data and measurement mechanisms for monitoring and evaluation
- Target quantifiable benefits to local communities
- Develop financial instruments such as Community Municipal Investments and Green Bonds to help support local communities
- Embed Green Public Procurement in their procurement of energy services and utilities

For a full copy of the Localis Report, see:

“Generating Hope: Local Power in Partnership”

Webinar for Audit Committee members



We held a webinar for members of Audit Committees on 4 June 2025.

Delivered by Grant Thornton specialists and drawing on experience from across the sector, the webinar covered: How to prepare for devolution and reorganisation; and shared experiences from other reorganisations - with a focus on:

- Learning from the recent formation of eight new unitary councils between 2019 and 2023
- Progress by the eight new unitary councils in 2023-24
- How to successfully reorganise local government at the same time as implementing devolution
- Project management lessons learned for reorganisation
- Performance measurement lessons learned for reorganisation
- Governance lessons learned for reorganisation
- Other relevant findings from Auditors Annual Reports for 2023-24.

The recording of our webinar can be accessed here: [Audit Committee webinar.](#)

Audit Committee resources

The Audit Committee and organisational effectiveness in local authorities (CIPFA):

<https://www.cipfa.org/services/support-for-audit-committees/local-authority-audit-committees>

LGA Regional Audit Forums for Audit Committee Chairs

These are convened at least three times a year and are supported by the LGA. The forums provide an opportunity to share good practice, discuss common issues and offer training on key topics. Forums are organised by a lead authority in each region. Please email ami.beeton@local.gov.uk LGA Senior Adviser, for more information.

Global Internal Audit Standards

[Global Internal Audit Standards](#)

Code of Audit Practice for local auditors (NAO):

<https://www.nao.org.uk/code-audit-practice/>

Governance risk and resilience framework: material for those with a leadership responsibility on good governance (CfGS):

<https://www.cfgs.org.uk/material-for-those-with-a-leadership-responsibility-on-good-governance/>

The Three Lines of Defence Model (IAA)

<https://www.theiia.org/globalassets/documents/resources/the-iias-three-lines-model-an-update-of-the-three-lines-of-defense-july-2020/three-lines-model-updated-english.pdf>

Risk Management Guidance / The Orange Book (UK Government):

<https://www.gov.uk/government/publications/orange-book>

CIPFA Guidance and Codes

The following all have a charge, so do make enquiries to determine if copies are available within your organisation.

Audit Committees: Practical Guidance For Local Authorities And Police

<https://www.cipfa.org/policy-and-guidance/publications/a/audit-committees-practical-guidance-for-local-authorities-and-police-2022-edition>

Delivering Good Governance in Local Government

<https://www.cipfa.org/policy-and-guidance/publications/d/delivering-good-governance-in-local-government-framework-2016-edition>

Financial Management Code

<https://www.cipfa.org/fmcode>

Implementing Global Internal Audit Standards

[Global Internal Audit Standards in the UK Public Sector](#)

Prudential Code

<https://www.cipfa.org/policy-and-guidance/publications/t/the-prudential-code-for-capital-finance-in-local-authorities-2021-edition>

Treasury Management Code

<https://www.cipfa.org/policy-and-guidance/publications/t/treasury-management-in-the-public-services-code-of-practice-and-crosssectoral-guidance-notes-2021-edition>



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