

Audit 260608
Item 5.



A&I Plan - DC

June 2008

Audit Plan

Copeland Borough Council

Audit 2008/09

External audit is an essential element in the process of accountability for public money and makes an important contribution to the stewardship of public resources and the corporate governance of public services.

Audit in the public sector is underpinned by three fundamental principles:

- auditors are appointed independently from the bodies being audited;
- the scope of auditors' work is extended to cover not only the audit of financial statements but also value for money and the conduct of public business; and
- auditors may report aspects of their work widely to the public and other key stakeholders.

The duties and powers of auditors appointed by the Audit Commission are set out in the Audit Commission Act 1998 and the Local Government Act 1999 and the Commission's statutory Code of Audit Practice. Under the Code of Audit Practice, appointed auditors are also required to comply with the current professional standards issued by the independent Auditing Practices Board.

Appointed auditors act quite separately from the Commission and in meeting their statutory responsibilities are required to exercise their professional judgement independently of both the Commission and the audited body.

Status of our reports

The Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission explains the respective responsibilities of auditors and of the audited body. Reports prepared by appointed auditors are addressed to non-executive directors/members or officers. They are prepared for the sole use of the audited body. Auditors accept no responsibility to:

- any director/member or officer in their individual capacity; or
- any third party.

Copies of this report

If you require further copies of this report, or a copy in large print, in Braille, on tape, or in a language other than English, please call 0844 798 7070.

© Audit Commission 2008

For further information on the work of the Commission please contact:

Audit Commission, 1st Floor, Millbank Tower, Millbank, London SW1P 4HQ

Tel: 020 7828 1212 Fax: 020 7976 6187 Textphone (minicom): 020 7630 0421

www.audit-commission.gov.uk

Contents

Introduction	5
Responsibilities	6
Fees	7
Specific actions Copeland Borough Council could take to reduce its audit fees	8
Process for agreeing any changes in audit fees	8
Auditor's report on the financial statements	9
Financial statements	9
VFM conclusion	9
Use of resources 2008/09	11
Mandated work	12
CPA and inspection	13
Advice and assistance	15
The audit and inspection team	16
Quality of service	16
Planned outputs	17
Appendix 1 – Elements of our work	18
Financial statements	18
Value for money conclusion	18
Use of resources assessment 2008/09	18
Data quality	19
Whole of government accounts	19
Certification of grant claims and returns	19
Appendix 2 – Basis for fee	20
Assumptions	20
Appendix 3 – Initial risk assessment – Use of resources and VFM conclusion	22
Appendix 4 – Independence and objectivity	23
Appendix 5 – Working together	25

4 Audit Plan | Contents

Meetings	25
Sustainability	26

Introduction

- 1 This plan sets out the audit and inspection work that I propose to undertake for the 2008/09 financial year. The plan is based on the Audit Commission's risk-based approach to audit planning and the requirements of moving towards Comprehensive Area Assessment (CAA). It reflects:
 - audit and inspection work specified by the Audit Commission for 2008/09;
 - current national risks relevant to your local circumstances; and
 - your local risks and improvement priorities.
- 2 During 2008/09, the role of Relationship Manager will be replaced by the post of Comprehensive Area Assessment Lead (CAAL). The CAAL will provide the focal point for the Commission's work in your local area, lead the CAA process, and ensure that the combined inspection programme across all inspectorates is tailored to the level and nature of risk for the area and its constituent public bodies. The Commission has become the statutory gatekeeper of all inspection activity involving local authorities.
- 3 As I have not yet completed my audit for 2007/08, the audit planning process for 2008/09, including the risk assessment, will continue as the year progresses, and the information and fees in this plan will be kept under review and updated as necessary.

Responsibilities

- 4 I comply with the statutory requirements governing my audit and inspection work, in particular:
 - the Audit Commission Act 1998;
 - the Local Government Act 1999; and
 - the Code of Audit Practice.
- 5 The Code of Audit Practice (the Code) defines auditors' responsibilities in relation to:
 - the financial statements (including the annual governance statement); and
 - the audited body's arrangements for securing economy, efficiency and effectiveness in its use of resources.
- 6 The Audit Commission's Statement of Responsibilities of Auditors and of Audited Bodies (from April 2008) sets out the respective responsibilities of the auditor and the Council. The Audit Commission has issued a copy of the Statement to every audited body.
- 7 The Statement summarises where the different responsibilities of auditors and of the audited body begin and end and our audit work is undertaken in the context of these responsibilities.

Fees

- 8 The details of the structure of scale fees are set out in the Audit Commission's work programme and fee scales 2008/09. Scale fees are based on a number of variables, including the type, size and location of the audited body.
- 9 The total indicative fee for the audit and inspection work included in this audit and inspection plan for 2008/09 is for £128,300, which compares to the planned fee of £124,258 for 2007/08. This represents a 3.3 per cent increase.
- 10 A summary of this is shown in the table below. The fee is determined by audit risks identified, mandated work and basic assumptions. A detailed breakdown of the audit and inspection fee is included in Appendix 2.

Table 1 Audit fee

Audit area	Planned fee 2008/09	Planned/actual 2007/08	Page
Total audit fee	£122,400	£110,100	21
Total inspection fee	£5,900	£14,200	21
	£128,300	£124,300	
Certification of claims and returns	£45,000	£48,400	21

- 11 The Audit Commission scale fee for Copeland Borough Council is £94,975. The fee proposed for 2008/09 is +29 per cent compared to the scale fee and is within the normal level of variation specified by the Commission.
- 12 The Audit Commission has the power to determine the fee above or below the scale fee where it considers that substantially more or less work is required than envisaged by the scale fee. The Audit Commission may, therefore, adjust the scale fee to reflect the actual work that needs to be carried out to meet the auditor's statutory responsibilities, on the basis of the auditor's assessment of risk and complexity at a particular body.
- 13 It is a matter for the auditor to determine the work necessary to complete the audit and, subject to approval by the Audit Commission, to seek to agree an appropriate variation to the scale fee with the Council. The Audit Commission expects normally to vary the scale fee by no more than 30 per cent (upwards or downwards). This fee then becomes payable.

8 Audit Plan | Fees

14 In setting the fee, I have assumed that:

- the level of risk in relation to the audit of the financial statements is not significantly different to that identified for 2007/08; and
- internal audit undertakes appropriate work on all systems; and
- good quality working papers and records will be provided to support the financial statements by 26 June 2009.

Further details of the assumptions are outlined in Appendix 2.

Specific actions Copeland Borough Council could take to reduce its audit fees

15 The Audit Commission requires its auditors to inform a council of specific actions it could take to reduce its audit fees. I have identified the following actions Copeland Borough Council could take.

- Introduce robust internal quality control procedures with respect to information to support the accounts, use of resources and data quality.
- Improve the administration of grant funding and the level of information supplied to support individual grant claims submitted for audit.

Process for agreeing any changes in audit fees

16 As set out in paragraph 4, I expect that the initial risk assessment may change as the year progresses. Where this is the case, we will discuss this in the first instance with the Head of Business and Finance. Supplements to the plan will be issued to record any revisions to the risk and the impact on the fee.

Auditor's report on the financial statements

- 17 I am required to issue an audit report giving our:
- opinion on whether the financial statements present fairly the financial position of the Council as at 31 March 2009; and
 - conclusion on whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

Financial statements

- 18 I have not undertaken a risk assessment for my audit of the financial statements as many of the specific risks which may not become apparent until after we have completed our 2007/08 audit. A separate opinion plan for the audit of the financial statements will be issued in December 2008, if required.
- 19 At this stage I am aware of the following risks that are likely to impact on my audit of the financial statements.
- Significant changes in the staff responsible for accounts preparation means that cumulative knowledge of Copeland's issues and transactions will be lost.

VFM conclusion

- 20 In reaching my conclusion, I will review evidence that is relevant to the Council's performance management and financial management arrangements.
- 21 The key risks highlighted from the planning are summarised in the table below with details of planned work to mitigate the risks. Full details of the risk assessment are outlined in Appendix 3.

Table 2 Key risks identified

Key risks identified	Planned work to address the risk
Housing services were inspected in 2007/08 and judged to be poor with poor prospects for improvement. The Council needs to make significant progress in rectifying the underlying weaknesses.	We will review the progress being made by the Council to inform our judgements of the Council's performance.

10 Audit Plan | Auditor's report on the financial statements

Key risks identified	Planned work to address the risk
<p>The key partners across Cumbria are entering a challenging and ambitious period in which the new LAA framework will be a key driving mechanism for improvement in all the communities of the area. The scale of the challenge will mean that innovative and transformational use of the total resources of the area will be critical to success. This requires highly effective and advanced partnership working that can deliver collectively and efficiently to maximise impact.</p>	<p>We will undertake a review that will focus on supporting the further development of effective partnership working. This cross-cutting programme will bring partners together around a number of key issues pertinent to the risks of that future challenge. We will provide facilitative processes to enable local development, based on knowledge of good practice around these issues.</p>

Use of resources 2008/09

- 22 The Commission proposes that the approach to the new use of resources assessment will be focussed on three themes with the detailed Key Lines of Enquiries to be confirmed. For each of the significant risks identified in relation to the use of resources work, I consider the arrangements put in place by the Council to mitigate the risk, and plan the work accordingly.
- 23 The initial risk assessment for use of resources work is shown in Appendix 3. This will be updated through the continuous planning process as the year progresses.

Mandated work

24 As part of the audit, the mandated work programme comprises:

- data quality for 2007/08; and
- whole of government accounts.

Appendix 1 highlights the work to be undertaken.

CPA and inspection

- 25 From April 2009, the Audit Commission, jointly with the other public service inspectorates, will be implementing Comprehensive Area Assessment (CAA). Therefore, 2008/09 is the last year in which corporate assessments and programme service inspections will be undertaken as part of the CPA framework.
- 26 The Audit Commission's CPA and inspection activity is underpinned by the principle of targeting our work where it will have the greatest effect, based upon assessments of risk and performance.
- 27 The Council's CPA category is and progress as reported in the Direction of Travel (DoT) is a key driver in the Commission's inspection planning process.
- 28 I have applied the principles set out in the CPA framework, '*CPA – District Council Framework From 2006*', recognising the key strengths and areas for improvement in the Council's performance.
- 29 Strengths in the Council's performance include:
 - A clear commitment in the Council's Five-Year Corporate Plan to deliver and resource the three key themes of effective leadership, achieving transformation of the local area and promoting prosperity.
 - Supporting the development of a Masterplan in West Cumbria to plan for the future and respond to the decommissioning of the nuclear industry and the possible social and economic decline it may bring.
 - The Council has extended the facilities at two key recycling sites within the borough in order to enable residents to recycle a wider range of waste.
- 30 Areas for improvement in the Council's performance include the following.
 - In the year 2006/07 the Council's overall performance was below the average for all district councils in terms of a selected set of performance measures.
 - The Council was identified as a 'planning standards' authority for 2007/08 because they had failed to meet national minimum standards for the processing of major applications.
 - The councils' ability to input into the strategic housing agenda in Cumbria was poor.

- 31 On the basis of the planning process, I have identified where inspection activity will be focused for 2008/09 as follows.

Table 3 Summary of inspection activity

Inspection activity	Reason/impact
Relationship Manager /Comprehensive Area Assessment Lead	To act as the Commission's primary point of contact with the Council and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.
Direction of Travel (DoT) assessment	An annual assessment, carried out by the RM/CAAL, of how well the Council is securing continuous improvement. The DoT statement will be reported in the Annual Audit and Inspection Letter. The DoT assessment summary will be published on the Commission's website.

Advice and assistance

- 32 Under paragraph 9 of Schedule 2A of the Audit Commission Act 1998 we have powers to provide 'advice and assistance' (A&A) to another public body where this is requested.
- 33 If you wish the Commission to provide additional services under these powers, please contact Ashley Wilson, your local Audit Manager, or Janet Gauld, the Northern Region A&A Lead (j-gauld@audit-commission.gov.uk).

The audit and inspection team

- 34 The key members of the audit and inspection team for the 2008/09 audit are shown in the table below.

Table 4 Audit and inspection team

Name	Contact details	Responsibilities
Karen Murray District Auditor	k-murray@audit-commission.gov.uk 0844 798 7041	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive and Audit Committee.
Tom Keena Interim CAAL	t-keena@audit-commission.gov.uk 0844 798 7338	The primary point of contact with the Council and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.
Ashley Wilson Audit Manager	a-wilson@audit-commission.gov.uk 01228 227 267	Manages and co-ordinates the different elements of the audit work. Key point of contact for the Director of Finance.

Quality of service

- 35 We are committed to providing you with a high quality service. If you are in any way dissatisfied, or would like to discuss how we can improve our service, please contact me in the first instance. Alternatively, You may wish to contact the North West Had of Operations, Frank Kerkham.
- 36 If we are unable to satisfy your concerns, you have the right to make a formal complaint to the Audit Commission. The complaints procedure is set out in the leaflet '*Something to Complain About*', which is available from the Commission's website or on request.

Planned outputs

- 37 Reports will be discussed and agreed with the appropriate officers before being issued to the audit committee.

Table 5 Planned outputs

Planned output	Indicative date
Audit Plan 2008/09	May 2008
Opinion Audit Plan, if required	December 2008
Interim audit memorandum	September 2009
Annual governance report	September 2009
Final accounts memorandum	September 2009
Use of resources report	October 2009
Annual Audit and Inspection Letter	TBC

Appendix 1 – Elements of our work

Financial statements

- 1 I will carry out my audit of the financial statements in accordance with International Standards on Auditing (UK and Ireland) issued by the Auditing Practices Board (APB).
- 2 I am required to issue an opinion on whether the financial statements present fairly, in accordance with applicable laws and regulations and the Statement of Recommended Practice on Local Authority Accounting in the United Kingdom 2008, the financial position of the Council as at 31 March 2009 and its income and expenditure for the year.
- 3 I am also required to review whether the Annual Governance Statement has been presented in accordance with relevant requirements, and to report if it does not meet these requirements or if the Annual Governance Statement is misleading or inconsistent with my knowledge of the Council.

Value for money conclusion

- 4 The Code requires me to issue a conclusion on whether the Council has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources. This is known as the value for money conclusion. The Code also requires the auditor to have regard to a standard set of relevant criteria, issued by the Audit Commission, in arriving at this conclusion.
- 5 In meeting this responsibility, I will review evidence that is relevant to the Council's corporate performance management and financial management arrangements. Where relevant work has been undertaken by other regulators, I will normally place reliance on their reported results to inform my work.
- 6 I will also follow up our work from previous years to assess progress in implementing agreed recommendations.

Use of resources assessment 2008/09

- 7 The Commission has now consulted on its proposals for the 2008/09 Use of Resources assessment. It proposes that the work required to arrive at the 2008/09 use of resources assessment is fully aligned with that required to arrive at the auditor's 2008/09 value for money conclusion.

- 8 The Commission proposes that the assessment will be based upon the evidence from three themes:
 - managing money;
 - managing the business; and
 - managing other resources.
- 9 The Commission proposes that Data Quality will become an element of the Use of Resources framework from 2008/09.

Data quality

- 10 This plan covers the 2007/08 data quality work. This is based on a three-stage approach covering:
 - Stage 1 – management arrangements;
 - Stage 2 – analytical review; and
 - Stage 3 – risk-based data quality spot checks of a sample of 2007/08 performance indicators.
- 11 Work will be focused on the 2007/08 overall arrangements for data quality, particularly on the responsibility of the Council to manage the quality of its data including data from partners where relevant.
- 12 My fee estimate reflects an assessment of risk in relation to the Council's data quality arrangements and performance indicators. This risk assessment may change depending on my assessment of your overall management arrangements at stage 1 and I will update my plan accordingly, including any impact on the fee.

Whole of government accounts

- 13 I will be required to review and report on your WGA consolidation pack in accordance with the approach agreed with HM Treasury and the National Audit Office.

Certification of grant claims and returns

- 14 I will continue to certify the Council's claims and returns on the following basis.
 - Claims below £100,000 will not be subject to certification.
 - Claims between £100,000 and £500,000 will be subject to a reduced, light-touch certification.
 - Claims over £500,000 will be subject to a certification approach relevant to the auditor's assessment of the control environment and management preparation of claims. A robust control environment would lead to a reduced certification approach for these claims.

- 5 Changes to the plan will be agreed with you. These may be required if:
- new residual audit risks emerge;
 - additional work is required by the Audit Commission or other regulators; or
 - additional work is required as a result of changes in legislation, professional standards or as a result of changes in financial reporting.
- 6 Below is a detailed breakdown of the audit and inspection fee for 2008/09.
- 7 The fee (plus VAT) will be charged in ten equal instalments from June 2008 to March 2009.

Table 6 Detailed audit and inspection fee

Audit area	Planned fee 2008/09	Planned/Actual fee 2007/08	Page
Audit			
Financial statements	£70,800	£63,600	9/18
Use of Resources	£41,700*	£35,900	18/21
Whole of government accounts	£10,900	£10,100	19
Data Quality 2007/08 Total audit fee	£122,400	£109,600	
Inspection			
Relationship management/CAAL	£3,000	£2,200	14
Direction of Travel	£2,900	£2,500	14
Service inspection		£2,100	
Corporate inspection		£7,400	
Total inspection fee	£5,900	£14,200	
Total audit and inspection fee	£128,300	£123,800	
Certification of claims and returns	£45,000	£48,400	19

**includes £5,000 fee for follow-up of housing inspection report.*

Appendix 3 – Initial risk assessment – Use of resources and VFM conclusion

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor's responsibilities
<p>The key partners across Cumbria are entering a challenging and ambitious period in which the new LAA framework will be a key driving mechanism for improvement in all the communities of the area. The scale of the challenge will mean that innovative and transformational use of the total resources of the area will be critical to success. This requires highly effective and advanced partnership working that can deliver collectively and efficiently to maximise impact.</p> <p>The Council's strategic approach to housing has gaps in the understanding the needs of diverse, shows little partnership working and has weaknesses in the understanding of the relationship between quality, performance and cost in achieving value for money (VFM).</p>	<p>The Council has representatives on most key partnerships</p>	<p>Yes</p>	<p>We will complete a review that will focus on supporting the further development of effective partnership working in a cross-cutting programme that brings partners together around a number of key issues pertinent to the risks of that future challenge. We will provide facilitative processes to enable local development, based on knowledge of good practice around these issues.</p>	<p>UoR KLOE 2.1,4.1,5.1</p>
<p>The Council's strategic approach to housing has gaps in the understanding the needs of diverse, shows little partnership working and has weaknesses in the understanding of the relationship between quality, performance and cost in achieving value for money (VFM).</p>	<p>The Council have recently put in place resources to tackle the actions needed, but have a tight deadline to make the required progress before re-inspection of housing occurs.</p>	<p>Yes</p>	<p>We will review progress in addressing the action plan to inform our judgement on the performance of the council.</p>	<p>UoR KLOE 2.1,4.1,5.1</p>

Appendix 2 – Basis for fee

- 1 The Audit Commission is committed to targeting its work where it will have the greatest effect, based upon assessments of risk and performance. This means planning work to address areas of risk relevant to my audit responsibilities and reflecting this in the audit fees. It also means making sure that my work is coordinated with the work of other regulators, and that my work helps you to improve.
- 2 The risk assessment process starts with the identification of the significant financial and operational risks applying at the Council with reference to:
 - our cumulative knowledge of the Council;
 - planning guidance issued by the Audit Commission;
 - the specific results of previous and ongoing audit work;
 - interviews with Council officers;
 - liaison with internal audit; and
 - the results of other review agencies' work where relevant.

Assumptions

- 3 In setting the fee, I have assumed that:
 - the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2007/08;
 - you will inform us of significant developments impacting on my audit;
 - internal audit meets the appropriate professional standards;
 - internal audit undertakes appropriate work on all systems that provide material figures in the financial statements sufficient that we can place reliance for the purposes of our audit;
 - good quality working papers and records will be provided to support the financial statements in line with the agreed timetable;
 - requested information will be provided within agreed timescales; and
 - prompt responses will be provided to draft reports; and
 - additional work will not be required to address questions or objections raised by local government electors.
- 4 Where these assumptions are not met, I will be required to undertake additional work which is likely to result in an increased audit fee. The fee for the audit of the financial statements will be re-visited when I issue the opinion audit plan.

Appendix 4 – Independence and objectivity

- 1 We are not aware of any relationships that may affect the independence and objectivity of the District Auditor and the audit staff, which we are required by auditing and ethical standards to communicate to you.
- 2 We comply with the ethical standards issued by the APB and with the Commission's requirements in respect of independence and objectivity as summarised below.
- 3 Auditors appointed by the Audit Commission are required to comply with the Commission's Code of Audit Practice and Standing Guidance for Auditors, which defines the terms of the appointment. When auditing the financial statements, auditors are also required to comply with auditing standards and ethical standards issued by the Auditing Practices Board (APB).
- 4 The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.
- 5 International Standard on Auditing (UK and Ireland) 260 (Communication of audit matters with those charged with governance) requires that the appointed auditor:
 - discloses in writing all relationships that may bear on the auditor's objectivity and independence, the related safeguards put in place to protect against these threats and the total amount of fee that the auditor has charged the client; and
 - confirms in writing that the APB's ethical standards are complied with and that, in the auditor's professional judgement, they are independent and their objectivity is not compromised.
- 6 The standard defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case, the appropriate addressee of communications from the auditor to those charged with governance is the Audit Committee. The auditor reserves the right, however, to communicate directly with the Council on matters which are considered to be of sufficient importance.
- 7 The Commission's Code of Audit Practice has an overriding general requirement that appointed auditors carry out their work independently and objectively, and ensure that they do not act in any way that might give rise to, or could reasonably be perceived to give rise to, a conflict of interest. In particular, appointed auditors and their staff should avoid entering into any official, professional or personal relationships which may, or could reasonably be perceived to, cause them inappropriately or unjustifiably to limit the scope, extent or rigour of their work or impair the objectivity of their judgement.

- 8 The Standing Guidance for Auditors includes a number of specific rules. The key rules relevant to this audit appointment are as follows.
- Appointed auditors should not perform additional work for an audited body (ie work over and above the minimum required to meet their statutory responsibilities) if it would compromise their independence or might give rise to a reasonable perception that their independence could be compromised. Where the audited body invites the auditor to carry out risk-based work in a particular area that cannot otherwise be justified as necessary to support the auditor's opinion and conclusions, it should be clearly differentiated within the Audit and Inspection Plan as being 'additional work' and charged for separately from the normal audit fee.
 - Auditors should not accept engagements that involve commenting on the performance of other auditors appointed by the Commission on Commission work without first consulting the Commission.
 - The District Auditor responsible for the audit should, in all but the most exceptional circumstances, be changed at least once every five years.
 - The District Auditor and senior members of the audit team are prevented from taking part in political activity on behalf of a political party, or special interest group, whose activities relate directly to the functions of local government or NHS bodies in general, or to a particular local government or NHS body.
 - The District Auditor and members of the audit team must abide by the Commission's policy on gifts, hospitality and entertainment.

Appendix 5 – Working together

Meetings

- 1 The audit and inspection team will maintain knowledge of your issues to inform audit and inspection through regular liaison with key officers.
- 2 Our proposal for meetings is as follows.

Table 7 Proposed meetings with officers

Council officers	Audit Commission staff	Timing	Purpose
Chief Executive	District Auditor (DA) Audit Manager (AM)	Quarterly: April, August, November, February	General update plus: <ul style="list-style-type: none"> • April - Audit and Inspection Plan • June - accounts progress and VFM
Directors	As appropriate	As required	General update
Head of Policy and Performance	AM	Quarterly	Update
Head of Finance and Business Development	AM and Team Leader (TL)	Quarterly	Update on audit and opinion issues
Chief Internal Auditor	AM and TL	Quarterly	Update on audit progress and issues
Audit Committee	DA and AM, with TL as appropriate	Quarterly	Formal reporting of: <ul style="list-style-type: none"> • Audit and Inspection Plan; • Annual governance report; • Annual Audit and Inspection Letter; and • other issues as appropriate.

Sustainability

- 3 The Audit Commission is committed to promoting sustainability in our working practices and we will actively consider opportunities to reduce our impact on the environment. This will include:
 - reducing paper flow by encouraging you to submit documentation and working papers electronically;
 - use of video and telephone conferencing for meetings as appropriate; and
 - reducing travel.