UHY Hacker Young
Chartered Accountants

Cobtree Manor Estate

Audit Findings Report
Year ended 31 March 2022

Helping you prosper

Contents

Introduction

Cobtree Manor Estate

Purpose of this audit findings report

The purpose of this report is to provide constructive observations which have arisen from our audit of the financial statements of Cobtree Manor Estate ("the Charity") for the year ended 31 March 2022.

This report provides an update to the matters raised in our Audit Service Plan, which was provided to the Trustees on 2 July 2022, focussing on observations that are significant to the responsibility of those charged with governance to oversee the financial reporting process as required by International Standard on Auditing (UK) 260, *Communication with those charged with governance,* (ISA (UK) 260).

Included within this Report are details of any unadjusted misstatements in the financial statements (with the exception of those deemed to be "clearly trivial"), any material weaknesses in systems we have identified during the course of our audit work and our views about the quality of accounting practices and financial reporting procedures, together with any further relevant matters.

Audit independence

We are required to reaffirm our independence at the conclusion of the audit.

We confirm that no matters have arisen that impact on our previous statement made in our Audit Service Plan that there are no relationships between our firm and connected entities and your Charity and related entities that need to be brought to your attention.

Should you have any questions relating to the issue of our independence and objectivity, please do not hesitate to contact Allan Hickie on 01795 475363 or at a.hickie@uhy-uk.com.

Confidentiality and limitations

Please note the following important limitations with regards to the contents of this Report:

- This Report has been prepared for the sole use of Cobtree Manor Estate;
- The contents of this Report must not be disclosed or quoted to third parties, in whole or in part, without our prior written consent;
- We assume no responsibility to any other person;
- Our procedures are carried out solely for the purpose of our audit of the financial statements. Our audit is not designed to identify all matters that may be relevant to those charged with governance; accordingly the matters referred to within this Report may not be the only shortcomings that exist.

Recommendations

All issues raised within this Audit Findings Report have been discussed with management.

Acknowledgement

We would like to thank all staff who were involved in the audit for their help and co-operation during our audit, particularly Paul Holland and his team. It has been a pleasure to work with Paul and we are grateful for the time he has taken to assist with our queries.

Audit status

Status of the audit

Our work was carried out in accordance with our audit plan communicated to you in our Audit Service Plan dated 2 July 2022.

Throughout our work we considered the key audit risks noted in our Audit Service Plan, and no matters were identified which required us to change our approach. Further to this, no additional risks were identified. We comment on the original risks communicated in our Audit Service Plan, and our conclusion on these risks later in this Report.

Our audit is substantially complete, although we are finalising our procedures in the following areas:

Outstanding matters:	Final signed Trustees' Report;
	Signed Letter of representation.

We do not anticipate that the completion of our work in these areas will give rise to any material adjustment.

Letter of representation

We have forwarded the Letter of Representation, which we request that the Trustees approve and sign at the same time as the financial statements, under separate cover. This letter contains only standard matters with no specific representations in respect of the Charity, with the exception of the following:

- Going concern
- Valuation of assets
- MyTime debtor recoverability

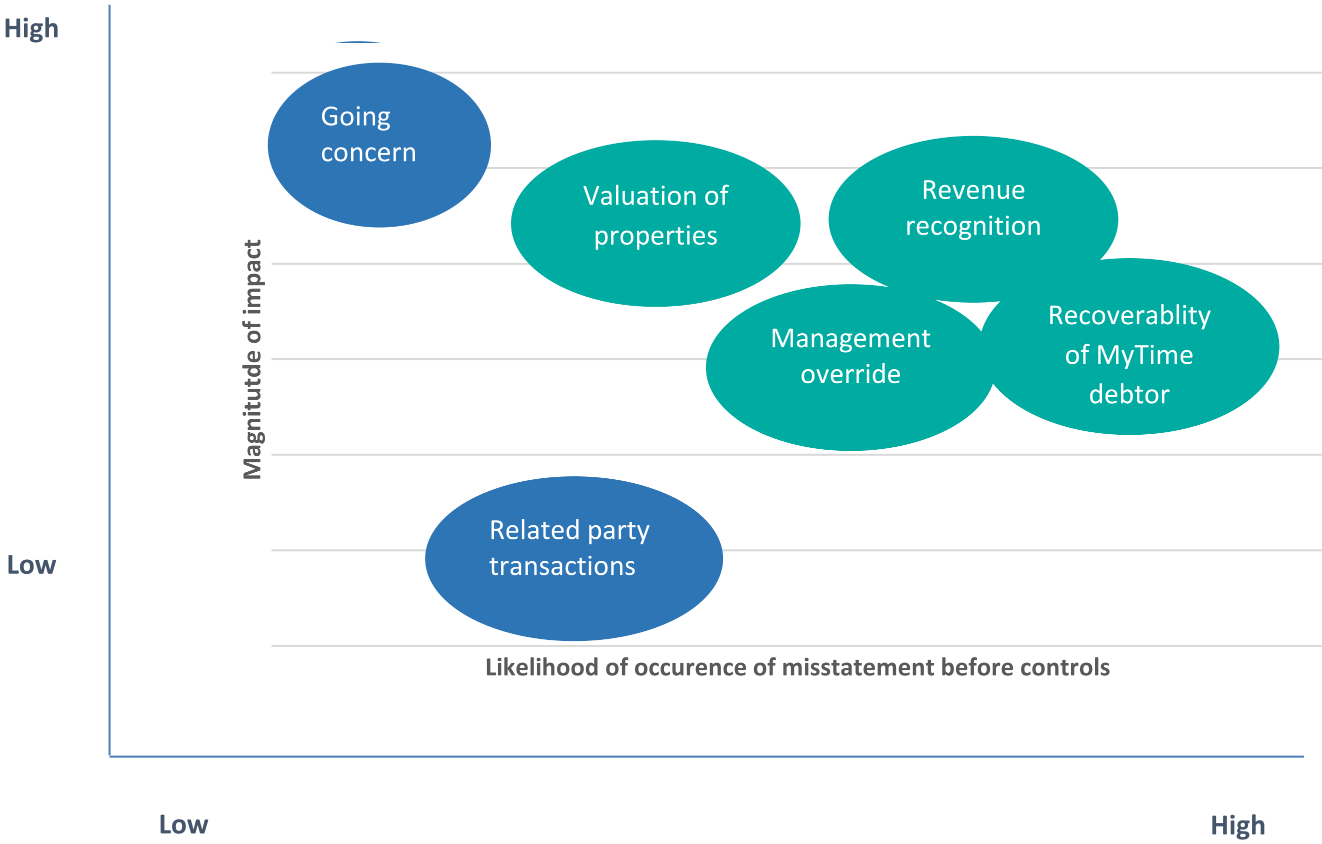
Anticipated audit report

Subject to the conclusion of the above items, we do not expect any modifications to our audit report on the financial statements for the year ended 31 March 2022. However, our responsibilities with regards to the audit report extend up to the date on which it is signed and we will advise you of any changes to this position if necessary.

Significant audit risks and other areas of audit focus

The table below set out our initial assessment of the Charity's key audit risks relating to the year ended 31 March 2022 as originally communicated in our Audit Service Plan.

Within this section we comment on the results of our work undertaken in connection with these risks previously identified at planning, together with communicating any additional risks in relation to the financial statements of Cobtree Manor Estate that came to our attention during the course of our audit fieldwork.



Key:

Significant risks

Others areas of audit focus

Updated risk

Update on risk profile

The work undertaken during the course of our audit fieldwork did not indicate that the risk profile of the above matters has significantly changed from our initial assessment.

Significant risks

(1) Revenue recognition

Assessment of risk at planning

The International Standards on Auditing (UK) consider revenue recognition to be an inherent fraud risk and on consideration of the Charity's sources of income, this cannot be rebutted.

The Charity's accounting policies for income should follow the criteria set out in FRS 102 and the Charities SORP.

Our response and conclusion

We have:

- Updated our documentation of the revenue process and controls in place, this included assessing the design and implementation of those controls.
- Assessed whether revenue was accounted in accordance with the accounting policy on revenue recognition.
- Analytically reviewed revenues and verified significant movements against expectations/performed proof in total
- Tested a sample of transactions to agreements to supporting evidence
- Reviewed the assessment made by management in relation to the application of the correct cut off processes

Based on the work performed, no significant or reportable adjustments were noted.

(2) Management override

Assessment of risk at planning

The International Standards on Auditing (UK) consider management override of controls to be an inherent fraud risk due to the possibility of financial statement bias or fraud. Whilst there were no indicators of any significant factors that would give rise for management to carry out such actions, as the Charity's finance team consists of few people and the Chief Executive has primary oversight of all key operational decisions we were unable to rebut this risk.

Our response and conclusion

We have:

- Updated our documentation around the posting of journals and formulation of key estimates and assessed the design and implementation of those controls.
- Assessed and challenged accounting estimates, judgements and decisions made by management.
- Tested a sample of journal entries, adjustments and accounting estimates for bias that could result in material misstatements.
- Review significant transactions to ensure they were in the normal course of business.

Based upon the work undertaken, we found no indication of management bias or significant transactions outside the normal course of business.

(3) Valuation of properties

Assessment of risk at planning

Given the movement in the property market there is the risk that there has been a material change in value in the land and buildings that has not been reflected in the accounts. Buildings are valued by chartered surveyors. Due to the nature of the assets and the valuation of the buildings is very high in value.

Our response and conclusion

We have:

- Agreed valuations to third party reports.

Based upon the work undertaken, we found properties were not materially misstated in the accounts.

Other areas of audit focus

Related parties

Transactions with related parties outside of the normal course of the Charity’s activities are considered to be a significant risk under the International Standards on Auditing (UK). At the planning stage, no such transactions were anticipated from our discussions with management and accordingly, related parties were not included as a significant audit risk.

We undertook work to ensure that related party disclosures have been correctly made in accordance with both the Financial Reporting Standard 102 (“FRS 102”) and the Charities SORP. This included providing management with our standard related parties questionnaire template to be completed by Trustees and members of key management personnel, together with review of the Charity’s own procedures for identifying potential conflicts of interests to ensure that they are adequate. In addition we verified the information supplied to external sources such as the registers maintained by Companies House and the Charity Commission.

Related party disclosures included within the financial statements appear to be complete from our work performed.

Accounting practices and financial reporting issues

Qualitative aspects of accounting practices and financial reporting

During the course of our audit, we consider the qualitative aspects of the financial reporting process, including items that have a significant impact on the relevance, reliability, comparability, understandability and materiality of the information provided by the financial statements.

Accounting policies

We have reviewed the accounting policies adopted by the Charity and have found them to be appropriate and applied consistently.

There have been no changes to the accounting policies, nor changes to the activities of the Charity necessitating changes to accounting policies, since the previous period.

Unusual transactions

The extent to which the financial statements are affected by any unusual transactions during the period and the extent to which such transactions are separately disclosed in the financial statements. There were no matters arising.

Throughout the course of our audit fieldwork, we considered the timing of transactions and the period in which they are recorded. We did not identify any significant transactions where we had concerns over the timing or the period in which they were recognised. Specifically, we confirm that based upon our testing, income appears to have been appropriately accrued or deferred as required and appropriate accruals for expenditure have been included.

Accounting estimates and judgements

We reviewed the appropriateness of accounting estimates and judgements, including the consistency of assumptions and degree of prudence reflected in the accounting records. There were no matters arising.

Going concern

We considered material uncertainties related to events and conditions that may cast significant doubt on the Charity's ability to continue as a going concern. There were no matters arising.

Trustees' Annual Report and Strategic Report

We reviewed the Trustees' Annual Report and Strategic Report to ensure consistency with the financial statements, and to ensure that all necessary disclosures have been made. There were no matters arising.

Disagreements

There were no disagreements about matters that, individually or in aggregate, could be significant to the Charity's financial statements or our auditor's report. We are required to report to the Trustees any such matters, whether they have or have not been resolved and the significance of these matters.

Significant difficulties

We encountered no significant difficulties during the course of the audit that we feel necessary to bring to your attention.

Significant matters

There were no significant matters arising from the audit that we have discussed, or were subject to correspondence with management which have required us to obtain written representations from management.

Other matters

As part of our audit work we consider the potential effect on the financial statements of any uncertainties, including significant risks and disclosures, such as pending litigation that are required to be disclosed in the financial statements.

Adjusted and unadjusted misstatements

Under the requirement of ISA (UK) 260, we are required to report to you all adjusted and unadjusted misstatements, with the exception of those deemed to be ‘clearly trivial’.

Below sets out the misstatements identified as part of this year’s audit.

Audit adjustments agreed with management

	£	£
Surplus per draft financial statements presented for audit (v2)		**171,511**
Remove accrued income not required	(30,000)	
Loan interest	(4,202)	
Reduction in UHY fees accrual	5,175	
Other misc diff	6	
Total impact of adjustments		**(29,021)**
Surplus per audited financial statements		**142,490**

All journals noted above have been processed through the financial statements.

Unadjusted items

	£	£
Surplus per audited financial statements		**142,490**
Understatement of additions at Garden Cottage	3,151	
Total impact of adjustments		**3,151**
Revised surplus if all audit adjustments processed		**145,641**

It has been agreed with management that the above unadjusted misstatements are immaterial, both individually and in aggregate, and therefore do not necessitate revision to the audited financial statements.

Trustees' representations regarding the non-adjustment of the above unadjusted misstatements will be included in the Letter of Representation.

Recommendations to processes and internal controls

The Charity's management is responsible for the identification, assessment and monitoring of risk, and for developing, operating and monitoring the systems of internal control and for providing assurance to the Board of Trustees that it has done so. During the course of our audit of the financial statements for the year ended 31 March 2022, we examined the principal internal controls which management has established to enable it to ensure, as far as possible, the accuracy and reliability of the Charity's assets.

International Standard on Auditing (UK) 265, *Communicating deficiencies in internal control to those charged with governance and management*, (ISA (UK) 265) requires us to report separately where we identify missing or ineffective controls which, in our judgement, are of sufficient importance to bring to the attention of those charged with governance.

During our work we identified no such weaknesses in controls (described as "significant deficiencies" per the ISA). We have however identified some recommendations for improvement as set out below.

The matters dealt with in this Audit Findings Report came to our attention during the conduct of our normal audit procedures which are primarily designed for the purpose of expressing our opinion on the financial statements of the Charity. In consequence it cannot be relied upon necessarily to disclose possible frauds or other irregularities, or to disclose all possible weaknesses or improvements in internal control that a more extensive special examination may highlight.

Our observations from the audit are set out below together with our recommendations and suggested timescale.

Key to risk ratings:


High

Urgent, potential impact on accuracy of financial reporting


Med

Important and could impact within six months


Low

Less urgent, requires attention

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Advisory

1. Accounting records information	
Observation	The audit was started in July 2022 with the accounts information provided. During the audit process a number of large differences were identified between the accounts and other information provided, mostly relating to bank, debtors and creditors. A new version of the accounts was provided in December 2022 with these corrected, however the balance sheet did not balance by £70k. This difference was discussed with your key management, and after further work by UHY the difference was partially resolved, subject to the inclusion of a £30,000 debtor for accrued income. This £30,000 debtor was written off in the final accounts because there was no justification for carrying it forward, and it did not seem to relate to money that would be received.
Recommendation	We recommend that your internal accounts preparation is streamlined so that the accounts are not prepared from a combination of Sage, Agresso and an accounts spreadsheet. The current approach is causing differences to occur and delays in the audit process. Once you have posted an opening balance journal to Sage to bring the system into line with the 2022 statutory accounts, we recommend that you ensure all transactions for 2022/23, including property and investment revaluations, and also all transactions with Maidstone Borough Council, are posted to Sage. It is important that regular reconciliations are made to the Council's own system to ensure that the "inter-company" balance between CME and MBC is always reflected accurately.
Status	High This has been graded as High because of the importance of ensuring the issues that occurred in 2022 do not repeat in the future.

2. VAT	
Observation	It was noted during our audit that VAT payments to HMRC were being posted to an expense code instead of being offset against the VAT liability. This has been corrected during the audit process this year but due to the way the accounts information is prepared has probably been missed in previous years resulting in brought forward balances not being cleared.
Recommendation	We recommend that VAT payments are offset against the VAT liability and the VAT liability in Sage is reviewed to ensure it is correct.
Status	

Sector developments

New Charities SORP (FRS 102)

The establishment of the new Charities SORP engagement process in the context of a global pandemic understandably led to a delayed start. The process is now fully underway with the Committee currently in the "reflection" phase of their timetable. It is during this phase that the Committee consider how well the Charities SORP, and accounting standards, meet their identified need and identify areas for change and potential solutions to effect beneficial change.

Following completion of this phase, the Committee will need to enter into a problem solving phase before drafting the new Charities SORP, based on the exposure draft of FRS 102 following its own periodic review as the new FRS 102 is a critical factor on the timing of the new Charities SORP process.

Public consultation of the new Charities SORP is expected between July 2022 and July 2023 with the SORP expecting to be finalised and published between October 2022 and January 2024. The intention is that the new Charities SORP would be effective for accounting periods beginning on or after 1 January 2024.

The future of Charity financial reporting

In May 2022 the Charity Commission for England and Wales (CCEW), the Charity Commission for Northern Ireland (CCNI) and the Office of the Scottish Charity Regulator (OSCR) wrote to the Financial Reporting Council (FRC) in their capacity as the joint SORP making body for charities in the UK. The purpose of this letter was to encourage the FRC to make changes to FRS 102 as a precursor to making a wholesale change to the financial reporting and accounting arrangements for not-for-profit organisations.

FRS 102 is primarily focused at for-profit entities, although some concessions are made to Public Benefit Entities as noted within Section 34 of the Standard.

The intention of the SORP making body is for FRS 102, which underpins the Charities SORP, is to acknowledge the differences in financial reporting required by for-profits and non-profits – particularly in cases when FRS 102 Section 1A highlights financial reporting exemptions that not-for-profits are unable to take advantage of as it contradicts the financial reporting requirements of the Charities SORP.

Other proposed changes arise from the desire to "de-clutter" charity accounts. One such example was the triennial review of FRS 102 in 2017, which clarified that comparative information be presented in respect of the preceding period for all amounts presented in the current period's financial statements. Evidence collected from users and preparers of charity accounts found that additional information included because of this clarification, such as comparative information in respect of a charity's Statement of Funds, has not proved informative or useful to decision making by users of the accounts.

The letter to the FRC then went further and proposed that the FRC develop a dedicated financial reporting standard for not-for-profits for the UK and Ireland. This would dispense of the need for the users and preparers of non-profit financial statements to refer to two, sometimes conflicting, financial reporting frameworks. This need has been driven to better recognise the charity sector's reporting realities and to remove the requirement to prepare disclosures which are driven by Companies Act and other legislative requirements. The SORP making body noted that the anticipation of further developments to FRS 102, with capital markets in mind, will undoubtedly increase the number of disclosures and reporting requirements burdensome to the sector, with little or no benefit to the users of charity financial statements.

IFR4NFP Project

IFR4NFP is an initiative to develop internationally applicable financial reporting guidance for non-profit organisations to improve accountability, consistency, transparency and trust. Led by Humentum, a non-profit membership association, and CIPFA, the Chartered Institute of Public Finance and Accountancy in UK, the project includes engagement with national standard setters and practitioners from every continent

Currently there is no international accounting standard for non-for-profit organisations in the same way as there are International Accounting Standards for companies. Not all countries have in place separate Statements of Recommended Practice for charities in the same way as the UK.

A consultation has been launched by the project and in 2022 they invited stakeholders in charity accounts, from around the world, to take part in an online survey. Evidence collected from a survey in 2014 noted that 72% of responders from 179 countries would be in favour of such a standard.

Once responses have been collated from the survey, IFR4NFP hopes to develop an exposure draft of a proposed Standard by mid-2023 with an intention to launch any final guidance in 2025.

Updated Charity SORP example accounts

The Charity SORP website has updated its two example Trustee Reports and Accounts to illustrate the disclosures charities should be making in their Annual Reports and Accounts during the current climate.

The Charities SORP making committee issued advisory guidance in March 2020 on the financial reporting implications of the Covid-19 global pandemic. The pandemic has meant that many charities have had transactions outside of their normal activities, for example making use of the government's Coronavirus Job Retention Scheme, requiring additional disclosures in their financial statements. The aim of the example accounts is to provide guidance on common disclosures that would impact many in the sector.

The example accounts for the Rosanna Grants Trust illustrates the impact of the pandemic on a grant-maker and the effect on both its income and activities. The Arts Theatre Trust provides an example where the pandemic has affected the charity's ability to operate and the it faces a challenging financial position and has taken up government financial assistance. Visit Charities SORP (charitysorp.org) to view the examples in detail.

Developments in Auditing

ISA (UK) 315 - Identifying and Assessing the risk of material misstatement becomes effective for audits of financial statements beginning on or after 15 December 2022. Early adoption is permitted. This updated ISA will significant increase the amount of documentation required by auditors, particularly in the planning stage of the audit.

UHY resources

As part of our commitment to keep our clients informed and up-to-date with the latest developments and ideas in the sector, we have a long-established charities sector blog which covers the latest issues, including any announcements from the Charity Commission, and explains how these issues could affect you. Latest blogs include:

- Charities – VAT treatment of donations & sponsorship
- Are you approving your charity accounts at properly constituted trustee meetings?
- Do what's right even if no one knows what you have done
- What would you do if your charity became the victim of fraud?
- The cost of living crisis - what can your charity do?
- Six steps to managing change in the charity sector

Visit our insights page to view our latest charity resources. www.uhy-uk.com/insights.

Charity and not-for-profit sector outlook

Our 2022/23 Charity Outlook aims, as always, to bring you the salient issues relevant to the sector at this time. This year's Outlook covers a range of topics such as talking about values, the impact of inflation on charities, trustee training, change management and VAT. We also have a fantastic interview with Nottingham Playhouse, who share some valuable insights.

https://www.uhy-uk.com/insights/charity-and-nfp-sector-outlook-202223