

Audit & Risk Committee Meeting

Notice of Meeting | 6th December 2022

Dear Councillors

I respectfully advise that the AUDIT & RISK COMMITTEE MEETING will be held in the Council Chambers, 10 Jennaberring Road, Quairading, WA on 6th December 2022 commencing at 5.00pm

MEETING AGENDA ATTACHED



Nicole Gibbs
CHIEF EXECUTIVE OFFICER
Date: 02 December 2022

Disclaimer

Members of the public should note that in any discussion regarding any planning or other application that any statement or intimation of approval made by any member or officer of the Shire of Quairading during the course of any meeting is not intended to be and is not to be taken as notice of approval from the Shire of Quairading. No action should be taken on any item discussed at a Council meeting prior to written advice on the resolution of the Council being received.

Any plans or documents contained in this document may be subject to copyright law provisions (*Copyright Act 1968*, as amended) and the express permission of the copyright owner(s) should be sought prior to the reproduction.

CONTENTS

ITEM 1	OPENING & ANNOUNCEMENTS	4
ITEM 2	ATTENDANCE AND APOLOGIES	4
ITEM 3	DEPUTATIONS/PRESENTATIONS/SUBMISSIONS/PETITIONS	4
ITEM 4	DECLARATIONS OF INTEREST	5
ITEM 5	CONFIRMATION OF MINUTES AND BUSINESS ARISING	6
5.1	Confirmation of Minutes: Audit & Risk Committee Meeting – 28 September 2022	6
	BUSINESS ARISING	6
ITEM 6	STANDING ITEMS – EXTERNAL AUDIT	7
6.1	Audit register - progress report.....	7
ITEM 7	STANDING ITEMS – CONTROLS, SYSTEMS AND PROCEDURES	11
7.1	Significant Accounting Policies - Two year review	11
7.2	Investment Policy - Two year review	31
7.3	Rates Collection Policy - Two year review.....	39
7.4	Office of the Auditor General - Financial Audit Results: Local Government 2020/21	46
ITEM 8	STANDING ITEMS – RISK MANAGEMENT REPORTS AND ISSUES	115
8.1	Report on excess annual leave and long service leave	115
ITEM 9	EMERGING ISSUES/LATE ITEMS	121
ITEM 10	NEXT MEETING DATE.....	122
ITEM 11	CLOSURE	122

SHIRE OF QUAIRADING

Audit & Risk Committee Meeting

ITEM 1 OPENING & ANNOUNCEMENTS

The Chairperson opened the meeting at _____ pm.

“Before we start our meeting, I would like to acknowledge that we are meeting on Noongar/Ballardong land. We pay respect to the original custodians of the land...past, present and future. I welcome you all here today for this meeting.”

ITEM 2 ATTENDANCE AND APOLOGIES

Councillors

Cr JN Haythornthwaite	Chairperson
Cr PD Smith	Shire President
Cr TJ Stacey	Deputy Shire President
Cr E Cheang	
Cr BR Cowcill	
Cr JC Hayes	
Cr JR Hippisley	

Council Officers

Ms NJ Gibbs	Chief Executive Officer
Ms LM Horton	Executive Manager, Corporate Services
Ms SC Caporn	Executive Manager, Works & Services
Ms NJ Ness	Executive Manager, Economic Development
Ms BJ Hadlow	Executive Officer

Observer/Visitor

Nil

Apologies

Nil

Leave of Absence Previously Granted

Nil

ITEM 3 DEPUTATIONS/PRESENTATIONS/SUBMISSIONS/PETITIONS

ITEM 4 DECLARATIONS OF INTEREST

Elected Members in accordance with section 5.61 and 5.65 of the *Local Government Act 1995* and the *Local Government (Model Code of Conduct) Regulations 2021* Schedule 1 Division 4 regulation 22:

A member who has an interest in any matter to be discussed at a Council or Committee meeting that will be attended by the member must disclose the nature of the interest -

- a. In a written notice given to the CEO before the meeting; or
- b. At the meeting immediately before the matter is discussed.

Local Government employees in accordance with section 5.70 or 5.71 of the *Local Government Act 1995* and the *Local Government (Administration) Regulations 1996* Part 4A Division 2, regulation 19AD:

An employee who has an interest in any matter to be discussed at a council or committee meeting attended by the local government employee disclose the nature of the interest —

- a. In a written notice given to the CEO before the meeting; or
- b. At the meeting immediately before the matter is discussed.

ITEM 5 CONFIRMATION OF MINUTES AND BUSINESS ARISING

5.1 Confirmation of Minutes: Audit & Risk Committee Meeting – 28 September 2022

OFFICER RECOMMENDATION

That the minutes of the Audit & Risk Committee meeting held on the 28 September 2022 be confirmed as a true and accurate record.

BUSINESS ARISING

ITEM 6 STANDING ITEMS – EXTERNAL AUDIT**6.1 Audit register - progress report****Responsible Officer** Nicole Gibbs, Chief Executive Officer**Reporting Officer** Leah Horton, Executive Manager, Corporate Services**Attachments** 1. Audit register progress report - November 2022 (confidential)**Voting Requirements** Simple Majority**Disclosure of Interest** Reporting Officer: Nil.Responsible Officer: Nil.

OFFICER RECOMMENDATION

That the Audit & Risk Committee recommends to Council that Council;

1. Notes the progress recorded against each item within the audit register in confidential attachment (i); and
2. Approves the two (2) findings marked as Closed (100%) in the audit register, to be registered complete, removed from the register and no longer reported to the Committee.

IN BRIEF

- This report provides an update on the progress of actions included in the audit register.
- The audit register includes all open audit findings that have previously been accepted by the Audit and Risk Committee.
- Reporting through the audit register commenced in November 2021 and includes items from the 2020/21 interim audit, and all subsequent audits.

MATTER FOR CONSIDERATION

Receipt of the audit register progress report to November 2022.

BACKGROUND

The external audit, also known as financial audits or audit of the annual financial statements, focuses on providing an objective and independent examination of the financial statements prepared by the Shire, increasing the value and user confidence in the financial statements.

The *Local Government Amendment (Auditing) Act 2017* made legislative changes to the *Local Government Act 1995* to provide for the auditing of local governments by the Auditor General. This Act allows the Auditor General to contract out some or all of the financial audits, but all audits will be the responsibility of the Auditor General.

The changes also allow for the Auditor General to undertake performance audits that focus on the economy, efficiency and effectiveness of any aspect of local government operations. These performance audits are similar to that of an internal audit, therefore the Auditor General may undertake both external and internal audits.

The audit register lists findings from audit reports previously accepted by the Audit & Risk Committee. The register describes the progress of implementing improvements and percentage completion. Progress on the actions are monitored by management, this Committee and Council.

Reporting through the audit register commenced for the 7th December 2021 Audit and Risk Committee meeting, with the register comprised of findings from the 2020/21 interim audit report, as presented to the Audit & Risk Committee at the 14th September 2021 meeting.

The 2020/21 final audit report had no findings subsequent to those from the interim audit report.

The 2021/22 interim audit report was received on the 16th August 2022, with six (6) findings presented to the 13th September 2022 ARC meeting. Those six findings were accepted by Council at the 29th September 2022 Ordinary Council Meeting and have now been added to the Audit register progress report.

The 2021/22 (draft) annual financial report was sent to the auditor on the 25th of November 2022 with the final audit scheduled to be performed on-site on December 12-13, with finalisation expected in early 2023.

STATUTORY ENVIRONMENT

Local Government (Audit) Regulations 1996

Local Government (Financial Management) Regulations 1996

Local Government Act 1995

POLICY IMPLICATIONS

Nil

FINANCIAL IMPLICATIONS

Council has a budget allocation of \$30,000 in the 2022/2023 Budget for the conduct of the external audit function by the Office of the Auditor General, for the audit of the 2021/22 annual financial statements. It is anticipated that a budget of a similar amount is to be adopted each year but will be the subject of an annual estimate of audit fees provided by the OAG. Officers' efforts to undertake the improvements and report on progress has not been estimated or reported.

ALIGNMENT WITH STRATEGIC PRIORITIES

5.4 Governance & Leadership: Implement systems and processes that meet legislative and audit obligations

CONSULTATION

Nil.

RISK ASSESSMENT

	Option 1
Financial	Low <i>Cost of the annual audit is included in the budget. By regularly reviewing progress against audit findings, the risks associated to misconduct and error are significantly reduced.</i>
Health	Low
Reputation	Low

	<i>Compliant with legislative requirements. Failure to complete the findings from audit reports would lead to increased reputational risk.</i>
Operations	Low <i>Operational impact is minimal in reporting progress on audit findings. Operational impact of not closing findings would escalate.</i>
Natural Environment	Low

	Consequence				
Likelihood	Insignificant	Minor	Moderate	Major	Critical
Rare	LOW Accept the risk Routine management	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Unlikely	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Possible	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review
Likely	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review	EXTREME Monthly senior management review
Almost certain	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	EXTREME Monthly senior management review	EXTREME Monthly senior management review

COMMENT

The audit register **confidential attachment (i)** counts actions and totals by “Finding #”. Each finding may have more than one “recommendation” and associated “agreed management action”. Only when all recommendations and agreed management actions within a finding are deemed complete will the finding as a whole be totalled at 100% complete and recommended to be closed.

The process for adding and removing findings to the audit register is as follows:

1. An external audit is completed and an audit report is finalised.
2. The audit report is presented to the Audit and Risk Committee (ARC).
3. The ARC recommends to Council that it notes and accepts the audit report.
4. All findings from the audit report are **added** to the audit register.
5. Progress is reported by management with updates recorded quarterly in “officer comment / action taken”.
6. Any findings deemed as complete by management are marked as “100% complete” with the status of “closed”.
7. The audit register – progress report is submitted by management to the ARC.
8. The ARC reviews the audit register and confirms completion of any 100% and closed findings.
9. The ARC recommends to Council that it notes progress and approves the findings marked as complete to be registered as closed.
10. Closed findings are **removed** from the audit register.

A summary of the audit register, included below, will illustrate the trend of actions that have been added, progressed and completed.

The blue row represents actions added by the ARC. New audit findings presented to the current meeting are included at the subsequent meeting, following acceptance.

The green row represents actions closed by the ARC and will always total 0 for the current meeting date. The closed actions from the current meeting will then be shown in the “closed by the Audit & Risk Committee” total in the subsequent meeting’s table summary.

Status of Actions	ARC - Meeting Date					Total
	7/12/21	15/03/22	7/06/22	13/09/22	06/12/22	
New actions added by ARC	7	0	0	0	6	13
Not commenced ≤10%	1	1	0	0	0	
Progressed >11% to 99%	2	2	2	0	4	
Completed =100%	4	0	1	2	2	
Total (0% to 100%)	7	3	3	2	6	
Closed by ARC	4	0	1	2		7
Total cumulative closed by ARC	4	4	5	7	7	
Open Actions	3	3	2	0	6	

The committee is requested to recommend to Council that Council note the progress and officer comments.

Six new actions have been added to the register following the 29/09/2022 endorsement by Council. All six of these findings have commenced remediation. There are two (2) findings marked as complete (100%) in the audit register to be registered as closed.

All closed items will not form part of the audit register report for future meetings. The closed items are available for external auditors and committee/council to review.

It is requested to note the audit register progress report in **confidential attachment (i)**.

ITEM 7 STANDING ITEMS – CONTROLS, SYSTEMS AND PROCEDURES**7.1 Significant Accounting Policies - Two year review**

Responsible Officer	Nicole Gibbs, Chief Executive Officer
Reporting Officer	Leah Horton, Executive Manager, Corporate Services
Attachments	1. Significant Accounting Policies [DRAFT] ↓
Voting Requirements	Simple Majority
Disclosure of Interest	Reporting Officer: Nil. Responsible Officer: Nil.

OFFICER RECOMMENDATION

That the Audit & Risk Committee recommends to Council for Council to endorse the two-year review of the Significant Accounting Policies.

IN BRIEF

- The Shire of Quairading has a “Significant Accounting Policies” policy which was last reviewed in December 2020.
- Shire policies are required to be reviewed every two years.
- Minor amendments and new policies can be considered and adopted by Council at any time.
- Senior management have undertaken a review of the current policy and is presenting the revision for committee consideration for recommendation to Council.
- This policy has been reviewed and updated in December 2022.

MATTER FOR CONSIDERATION

For the Audit and Risk Committee to recommend to Council for Council to endorse the two-year review of the “Significant Accounting Policies” policy.

BACKGROUND

In accordance with section 2.7(2)(b) of the *Local Government Act 1995*, Council is to determine the local government’s policies. Reviewing these documents on a regular basis ensures policies reflect current operating practices and procedures and legislative change.

The Audit & Risk Committee, as a committee of Council, is able to review new policies and policy amendments and make recommendation of policy adoption to Council.

The 2020 review of the Significant Accounting Policies document was substantial due to the changes in various Accounting Standards. Since the last revision was endorsed there have been no changes to Accounting Standards affecting this policy.

STATUTORY ENVIRONMENT

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Australian Accounting Standards

POLICY IMPLICATIONS

Significant Accounting Policies

FINANCIAL IMPLICATIONS

There are no financial implications associated with the review of this policy.

ALIGNMENT WITH STRATEGIC PRIORITIES

- 5.4 Governance & Leadership:** Implement systems and processes that meet legislative and audit obligations
- 5.3 Governance & Leadership:** Provide informed and transparent decision making that, meets our legal obligations, and the needs of our diverse community

CONSULTATION

Nil.

RISK ASSESSMENT

	Option 1
Financial	Low <i>The content within the Significant Accounting Policies covers many areas of financial risk to the Shire for various reasons (i.e., impairment). However, by having the policy, unforeseen risks are minimised.</i>
Health	Low
Reputation	Low <i>The development and regular review of policies ensures a consistent and adopted approach for the Shire to effectively achieve strategic objectives contained within the key result areas of the Strategic Community Plan.</i>
Operations	Low <i>The content within the Significant Accounting Policies often has an aspect of risk to operations. The overall impact of the policy is an attempt to mitigate the level of risk to the Shire through sound governance and management policy.</i>
Natural Environment	Low

	Consequence				
Likelihood	Insignificant	Minor	Moderate	Major	Critical
Rare	LOW Accept the risk Routine management	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Unlikely	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Possible	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review
Likely	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review	EXTREME Monthly senior management review
Almost certain	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	EXTREME Monthly senior management review	EXTREME Monthly senior management review

COMMENT

Shire policies are reviewed biannually to ensure that they are still consistent with Council’s current stance, preference and consistent with current legislation.

A number of minor amendments have been made throughout the Significant Accounting Policies document in relation to formatting, spelling, grammar and ordering of elements. These amendments are considered to be minor as they do not alter the purpose or objective of the policy.

More detailed amendments, alterations and inclusions have been made throughout the policy to ensure that the policy was reflective of the most current practice. The existing policy was compared to both the 2022/23 statutory budget and the (draft) 2021/22 annual financial report. These documents are based off the Moore Australia templates and are therefore the most current in relation to interpretation and inclusion of the Australian Accounting Standards, the *Local Government Act 1995* and the *Local Government (Financial Management) Regulations 1996*. Policy wording was updated to ensure consistency between the budget, financial report and the policy.

Several other local government’s Significant Accounting Policies documents were reviewed to ensure that the information contained within the policy was correct and worded in the most appropriate manner.

Even with these changes, the amendments are considered to be minor as they do not alter the purpose or objective of the policy, and overall there were no errors or omissions from the previous policy that would indicate a major change in policy.

The next review is scheduled for December 2024, or earlier in the instance that there are major changes in Shire operations or the legislation that presides over this policy.

SIGNIFICANT ACCOUNTING POLICIES



SIGNIFICANT ACCOUNTING POLICIES

PURPOSE

To provide direction for the preparation of financial transactions and financial reporting.

OBJECTIVE

To adopt full accrual accounting and all other applicable accounting standards in accordance with the *Local Government Act 1995*, *Local Government (Financial Management) Regulations 1996* and Australian Accounting Standards.

To clearly detail the accounting clearly identify the basis upon which Council's annual budget, monthly financial statements, and annual financial report are prepared.

POLICY & PROCEDURE

SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The financial report comprises general purpose financial statements which have been prepared in accordance with Australian Accounting Standards (as they apply to local governments and not-for-profit entities) and interpretations of the Australian Accounting Standards Board, and the *Local Government Act 1995* and accompanying regulations.

The *Local Government Act 1995* and accompanying regulations take precedence over Australian Accounting Standards where they are inconsistent.

Accounting policies which have been adopted for the preparation of financial reports have been consistently applied unless stated otherwise. Except for cash flow and rate setting information, reports are prepared on the accrual basis and are based on historical costs, modified, where applicable, by the measurement at fair value of selected non-current assets, financial assets and liabilities.

Critical Accounting Estimates

The preparation of a financial report in conformity with Australian Accounting Standards requires management to make judgements, estimates and assumptions that effect the application of policies and reported amounts of assets and liabilities, income and expenses.

The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances; the results of which form the basis of making the judgements about carrying values of assets and liabilities that are not readily apparent from other sources. Actual results may differ from these estimates.

The Local Government Reporting Entity

All funds through which the Shire of Quairading controls resources to carry on its functions will be included in the financial statements forming part of the financial reports (annual, monthly and budget).

In the process of reporting on the local government as a single unit, all transactions and balances between those funds (for example, loans and transfers between funds) have been eliminated.

All monies held in the trust fund are excluded from the financial statements.

SIGNIFICANT ACCOUNTING POLICIES

**Revenue and Expenses****Rates**

Control over assets acquired from rates is obtained at the commencement of the rating period. The entire balance of rates revenue has been recognised at a point in time in accordance with AASB 1058: Income of Not-For-Profit Entities.

All rates are levied under the *Local Government Act 1995*. Includes general, differential, specified area rates, minimum rates, interim rates, back rates, ex-gratia rates, less discounts and concessions offered. Excludes administration fees, interest on instalments, interest on arrears, service charges and sewerage rates.

Prepaid rates are, until the taxable event has occurred (start of the next financial year), refundable at the request of the ratepayer. Rates received in advance are initially recognised as a financial liability. When the taxable event occurs, the financial liability is extinguished and the Shire recognises revenue for the prepaid rates that have not been refunded.

Service charges

Service charges are imposed under Division 6 of Part 6 of the *Local Government Act 1995*. Regulation 54 of the *Local Government (Financial Management) Regulations 1996* identifies these as television and radio broadcasting, underground electricity and neighbourhood surveillance services.

Service charges excludes rubbish removal charges. Interest and other items of a similar nature received from bank and investment accounts, interest on rate instalments, interest on rate arrears and interest on debtors.

Grants, Donations and Other Contributions

Operating grants, subsidies and contributions are grants, subsidies or contributions that are not non-operating in nature.

Non-operating grants, subsidies and contributions are amounts received for the acquisition or construction of recognisable non-financial assets to be controlled by the local government.

Fees and Charges

Revenue (other than service charges) from the use of facilities and charges made for local government services, sewerage rates, rentals, hire charges, fee for service, photocopying charges, licences, sale of goods or information, fines, penalties and administration fees.

Interest earnings

Interest income is calculated by applying the effective interest rate to the gross carrying amount of a financial asset measured at amortised cost except for financial assets that subsequently become credit-impaired. For credit-impaired financial assets the effective interest rate is applied to the net carrying amount of the financial asset (after deduction of the loss allowance).

Interest income is recognised as operating revenue where it is earned from financial assets that are held for cash management purposes. Interest earned from investing monies held in reserve accounts will be classified as operating revenue and then transferred to the relevant reserve account/s.

SIGNIFICANT ACCOUNTING POLICIES

**Cash and cash equivalents**

Cash and cash equivalents include cash on hand, cash at bank, deposits available on demand with banks and other short term highly liquid investments with original maturities of three months or less that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value. Bank overdrafts are reported as short term borrowings in current liabilities in the statement of financial position. Term deposits are presented as cash equivalents if they have a maturity of three months or less from the date of acquisition and are repayable with 24 hours' notice with no loss of interest.

Restricted financial assets

Restricted financial asset balances are not available for general use by the local government due to externally imposed restrictions. Restrictions are specified in an agreement, contract or legislation. This applies to reserves, unspent grants, subsidies and contributions and unspent loans that have not been fully expended in the manner specified by the contributor, legislation or loan agreement and for which no liability has been recognised.

Other financial assets at amortised cost

The Shire classifies financial assets at amortised cost if both of the following criteria are met:

- (a) the asset is held within a business model whose objective is to collect the contractual cashflows, and
- (b) the contractual terms give rise to cash flows that are solely payments of principal and interest.

Fair values of financial assets at amortised cost are not materially different to their carrying amounts, since the interest receivable on those assets is either close to current market rates or the assets are of a short-term nature. Non-current financial assets at amortised cost fair values are based on discounted cash flows using current market rates. They are classified as level 2 fair values in the fair value hierarchy due to the observable market rates.

Interest received is presented under cashflows from operating activities in the Statement of Cash Flows where it is earned from financial assets that are held for cash management purposes.

Financial assets at fair value through profit and loss

The Shire classifies the following financial assets at fair value through profit and loss:

- (a) debt investments which do not qualify for measurement at either amortised cost or fair value through other comprehensive income.
- (b) equity investments which the Shire has not elected to recognise fair value gains and losses through other comprehensive income.

Investments and other financial assets

The Shire, in accordance with AASB 139: Financial Instruments- Recognition and Measurement, classifies each of its investments into one of the following categories for measurement purposes. The classification depends on the purpose for which the investments were acquired. Management determines the classification of its investments at initial recognition and, in the case of assets classified as held-to-maturity, re-evaluates this designation at each reporting date.

SIGNIFICANT ACCOUNTING POLICIES



(a) Financial assets at fair value through profit or loss

Financial assets at fair value through profit or loss are financial assets held for trading. A financial asset is classified in this category if acquired principally for the purpose of selling in the short term. Derivatives are classified as held for trading unless they are designated as hedges. Assets in this category are classified as current assets.

(b) Held-to-maturity investments

Held-to-maturity investments are non-derivative financial assets with fixed or determinable payments and fixed maturities that the Shire's management has the positive intention and ability to hold to maturity. They are subsequently measured at amortised cost and recognised in profit or loss.

Held-to-maturity financial assets are included in non-current assets, except for those with maturities less than 12 months from the reporting date, which are classified as current assets.

(c) Available-for-sale financial assets

Available-for-sale financial assets are non-derivative financial assets that are either not suitable to be classified into other categories of financial assets due to their nature, or they are designated as such by management. They comprise investments in the equity of other entities where there is neither a fixed maturity nor fixed or determinable payments.

They are subsequently measured at fair value with changes in such fair value (i.e. gains or losses) recognised in other comprehensive income (except for impairment losses). When the financial asset is derecognised, the cumulative gain or loss pertaining to that asset previously recognised in other comprehensive income is reclassified into profit or loss.

SIGNIFICANT ACCOUNTING POLICIES

**Trade and other receivables**

Trade and other receivables include amounts due from ratepayers for unpaid rates and service charges and other amounts due from third parties for grants, contributions, reimbursements, and goods sold and services performed in the ordinary course of business.

Trade and other receivables are recognised initially at the amount of consideration that is unconditional, unless they contain significant financing components, when they are recognised at fair value.

Classification and subsequent measurement

Receivables which are generally due for settlement within 30 days except rates receivables, which are expected to be collected within 12 months, are classified as current assets. All other receivables such as, deferred pensioner rates receivable after the end of the reporting period are classified as non-current assets.

Trade and other receivables are held with the objective to collect the contractual cashflows and therefore the Shire measures them subsequently at amortised cost using the effective interest rate method.

Due to the short term nature of current receivables, their carrying amount is considered to be the same as their fair value. Non-current receivables are indexed to inflation, any difference between the face value and fair value is considered immaterial.

Impairment and risk exposure

Receivables expected to be collected within 12 months of the end of the reporting period are classified as current assets. All other receivables are classified as non-current assets.

Trade receivables are held with the objective to collect the contractual cashflows and therefore measures them subsequently at amortised cost using the effective interest rate method.

Due to the short term nature of current receivables, their carrying amount is considered to be the same as their fair value. Non-current receivables are indexed to inflation, any difference between the face value and fair value is considered immaterial.

The Shire's major receivables comprise rates annual charges and user fees and charges. The major risk associated with these receivables is credit risk – the risk that the debts may not be repaid. The Shire manages this risk by monitoring outstanding debt and employing debt recovery policies. It also encourages ratepayers to pay rates by the due date through incentives.

Credit risk on rates and annual charges is minimised by the ability of the Shire to recover these debts as a secured charge charges at higher than market rates, which further encourages payment. The level of outstanding receivables is reported to Council monthly and benchmarks are set and monitored for acceptable collection performance.

The Shire applies the AASB 9: Financial Instruments simplified approach to measuring expected credit losses using a lifetime expected loss allowance for all trade receivables. To measure the expected credit losses, rates receivable are separated from other trade receivables due to the difference in payment terms and security for rates receivable.

SIGNIFICANT ACCOUNTING POLICIES

**Inventories**

Inventories are measured at the lower of cost and net realisable value.

Net realisable value is the estimated selling price in the ordinary course of business less the estimated costs of completion and the estimated costs necessary to make the sale.

Land held for resale

Land held for development and resale is valued at the lower of cost and net realisable value. Cost includes the cost of acquisition, development, borrowing costs and holding costs until completion of development.

Borrowing costs and holding charges incurred after development is completed are expensed. Gains and losses are recognised in profit or loss at the time of signing an unconditional contract of sale if significant risks and rewards, and effective control over the land, are passed onto the buyer at this point. Land held for resale is classified as current except where it is held as non-current based on the Council's intentions to release for sale.

Other Assets**Other current assets**

Other non-financial assets include prepayments which represent payments in advance of receipt of goods or services or that part of expenditure made in one accounting period covering a term extending beyond that period.

Contract assets

Contract assets primarily relate to the Shire's right to consideration for work completed but not billed at the end of the period. This is due to the Shire not having met the performance obligations in the contract which give an unconditional right to receive consideration.

Impairment and risk exposure

The Shire applies the AASB 9: Financial Instruments simplified approach to measure expected credit losses which uses a lifetime expected loss allowance for all contract assets. To measure the expected credit losses, contract assets have been grouped based on shared credit risk characteristics and the days past due.

Fixed Assets

Each class of fixed assets within either property, plant and equipment or infrastructure, is carried at cost or fair value as indicated less, where applicable, any accumulated depreciation and impairment losses.

Initial recognition and measurement for assets held at cost

Plant and equipment including furniture and equipment is recognised at cost on acquisition in accordance with *Financial Management Regulation 17A*. Where acquired at no cost the asset is initially recognised at fair value. Assets held at cost are depreciated and assessed for indicators of impairment annually.

SIGNIFICANT ACCOUNTING POLICIES

**Initial recognition and measurement between mandatory revaluation dates for assets held at fair value**

Assets for which the fair value as at the date of acquisition is under \$5,000 are not recognised as an asset in accordance with *Financial Management Regulation 17A (5)*. These assets are expensed immediately.

Where multiple individual low value assets are purchased together as part of a larger asset or collectively forming a larger asset exceeding the threshold, the individual assets are recognised as one asset and capitalised.

In relation to this initial measurement, cost is determined as the fair value of the assets given as consideration plus costs incidental to the acquisition. For assets acquired at zero cost or otherwise significantly less than fair value, cost is determined as fair value at the date of acquisition. The cost of non-current assets constructed by the Shire includes the cost of all materials used in construction, direct labour on the project and an appropriate proportion of variable and fixed overheads.

Individual assets that are land, buildings, infrastructure and investment properties acquired between scheduled revaluation dates of the asset class in accordance with the mandatory measurement framework, are recognised at cost and disclosed as being at fair value as management believes cost approximates fair value. They are subject to subsequent revaluation at the next revaluation date in accordance with the mandatory measurement framework.

Revaluation

The fair value of land, buildings, infrastructure and investment properties is determined at least every five years in accordance with the regulatory framework. This includes buildings and infrastructure items which were pre-existing improvements (i.e. vested improvements) on vested land acquired by the Shire.

At the end of each period the carrying amount for each asset class is reviewed and where appropriate the fair value is updated to reflect current market conditions. This process is considered to be in accordance with *Local Government (Financial Management) Regulations 1996 s17A (2)* which requires land, buildings, infrastructure, investment properties and vested improvements to be shown at fair value.

For property, plant and equipment and infrastructure, increases in the carrying amount arising on revaluation of assets are credited to a revaluation surplus in equity. Decreases that offset previous increases of the same class of asset are recognised against revaluation surplus directly in equity. All other decreases are recognised in profit or loss. Subsequent increases are then recognised in profit or loss to the extent they reverse a net revaluation decrease previously recognised in profit or loss for the same class of asset.

Depreciation

The depreciable amount of all property, plant and equipment and infrastructure, are depreciated on a straight-line basis over the individual asset's useful life from the time the asset is held ready for use. Leasehold improvements are depreciated over the shorter of either the unexpired period of the lease or the estimated useful life of the improvements.

The assets residual values and useful lives are reviewed, and adjusted if appropriate, at the end of each reporting period.

SIGNIFICANT ACCOUNTING POLICIES



An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount.

Gains and losses on disposals are determined by comparing proceeds with the carrying amount. These gains and losses are included in the statement of comprehensive income in the period in which they arise.

Depreciation rates

Typical estimated useful lives for the different asset classes for the current and prior years are included in the table below:

Asset Class	Useful life
Buildings	25 - 95 years
Furniture and equipment	5 - 40 years
Plant and equipment	4 - 40 years
Unsealed Roads	
- Aggregate Surfaces	15 - 20 years
- Asphalt Surfaces	15 - 20 Years
- Pavement Surfaces	12 - 16 Years
Drainage Systems	60 - 100 Years
Clearing & Formation	Not Depreciated
Culverts/Floodways	60 - 100 Years
Concrete Footpaths	40 - 65 Years
Footpaths Other	15 - 65 Years
Kerbing	60 - 100 Years
Bridges	80 - 175 Years
Other Infrastructure	10 - 175 years
Right-of-use (buildings)	Based on the remaining lease
Right-of-use (plant and equipment)	Based on the remaining lease
Intangible assets - computer software licence	5 years

Depreciation on revaluation

When an item of property, plant and equipment and infrastructure is revalued, any accumulated depreciation at the date of the revaluation is treated in one of the following:

- (a) The gross carrying amount is adjusted in a manner that is consistent with the revaluation of the carrying amount of the asset. For example, the gross carrying amount may be restated by reference to observable market data or it may be restated proportionately to the change in the carrying amount. The accumulated depreciation at the date of the revaluation is adjusted to equal the difference between the gross carrying amount and the carrying amount of the asset after taking into account accumulated impairment losses; or
- (b) Eliminated against the gross carrying amount of the asset and the net amount restated to the revalued amount of the asset.

SIGNIFICANT ACCOUNTING POLICIES

**Amortisation**

All intangible assets with a finite useful life, are amortised on a straight-line basis over the individual asset's useful life from the time the asset is held for use.

The residual value of intangible assets is considered to be zero and the useful life and amortisation method are reviewed at the end of each financial year.

Amortisation is included within depreciation on non-current assets in the Statement of Comprehensive Income and in the fixed assets note.

Capitalisation Threshold

Expenditure on items under \$5,000 is not capitalised.

Australian Accounting Standards – Inconsistency**Land under control prior to 1 July 2019**

In Western Australia, most land under roads is Crown Land, the responsibility for managing which, is vested in the local government.

Effective as at 1 July 2008, Council elected not to recognise any value for land under roads acquired on or before 30 June 2008. This accords with the treatment available in Australian Accounting Standard AASB 1051: Land Under Roads and the *then Local Government (Financial Management) Regulations 1996* s16(a)(i) which arbitrarily prohibited local governments from recognising such land as an asset.

Whilst such treatment is inconsistent with the requirements of AASB 1051: Land Under Roads, *Local Government (Financial Management) Regulations 1996* s4(2) provides, in the event of such an inconsistency, the *Local Government (Financial Management) Regulations 1996* prevail. Consequently, any land under roads acquired on or after 1 July 2008 was not included as an asset of the Shire.

Land under roads from 1 July 2019

As a result of amendments to the *Local Government (Financial Management) Regulations 1996*, effective from 1 July 2019, vested land, including land under roads, are treated as right-of-use assets measured at cost, and are considered a zero-cost concessionary lease.

Therefore, the previous inconsistency with AASB 1051: Land Under Roads in respect of non-recognition of land under roads acquired on or after 1 July 2008 has been removed, even though measurement at zero cost means that land under roads is still not included in the statement of financial position.

All right-of-use assets under zero cost concessionary leases are measured at zero cost rather than at fair value, except for vested improvements on concessionary land leases such as roads, buildings or other infrastructure which continue to be reported at fair value, as opposed to the vested land which is measured at zero cost.

The measurement of vested improvements at fair value in accordance with *Local Government (Financial Management) Regulations 1996* s17A(2)(iv) is a departure from AASB 16: Leases which would have required the Shire to measure the vested improvements as part of the related right-of-use assets at zero cost.

SIGNIFICANT ACCOUNTING POLICIES

**Trade and Other Payables**

Trade and other payables represent liabilities for goods and services provided to the Shire prior to the end of the financial year that are unpaid and arise when the Shire becomes obliged to make future payments in respect of the purchase of these goods and services.

The amounts are unsecured, are recognised as a current liability and are normally paid within 30 days of recognition. The carrying amounts of trade and other payables are considered to be the same as their fair values, due to their short-term nature.

Prepaid rates

Prepaid rates are, until the taxable event has occurred (start of the next financial year), refundable at the request of the ratepayer. Rates received in advance are initially recognised as a financial liability. When the taxable event occurs, the financial liability is extinguished and the Shire recognises revenue for the prepaid rates that have not been refunded.

Other Liabilities**Contract Liabilities**

Contract liabilities represent the Shire's obligation to transfer goods or services to a customer for which the Shire has received consideration from the customer.

Contract liabilities represent performance obligations which are not yet satisfied. In accordance with AASB 15: Revenue from Contracts with Customers and AASB 1058: Income of Not-for-Profit Entities, contract liabilities are recognised as revenue when the performance obligations in the contract are satisfied.

Capital grant/contribution liabilities

Capital grant/contribution liabilities represent the Shire's obligations to construct recognisable non-financial assets to identified specifications to be controlled by the Shire which are yet to be satisfied. Capital grant/contributions liabilities are recognised as revenue when the obligations in the contract are satisfied.

Non-current capital grant/contribution liabilities fair values are based on discounted cash flows of expected cashflows to satisfy the obligations using a current borrowing rate. They are classified as level 3 fair values in the fair value hierarchy due to the unobservable inputs, including own credit risk.

Borrowings**Financial liabilities**

Financial liabilities are initially recognised at fair value when the Shire becomes a party to the contractual provisions of the instrument.

Non-derivative financial liabilities (excluding financial guarantees) are subsequently measured at amortised cost. Gains or losses are recognised in profit or loss.

Financial liabilities are derecognised where the related obligations are discharged, cancelled or expired. The difference between the carrying amount of the financial liability extinguished or transferred to another party and the fair value of the consideration paid, including the transfer of non-cash assets or liabilities assumed, is recognised in profit or loss.

SIGNIFICANT ACCOUNTING POLICIES

**Borrowing costs**

Borrowing costs are recognised as an expense when incurred except where they are directly attributable to the acquisition, construction or production of a qualifying asset. Where this is the case, they are capitalised as part of the cost of the particular asset until such time as the asset is substantially ready for its intended use or sale.

Fair values of borrowings are not materially different to their carrying amounts, since the interest payable on those borrowings is either close to current market rates or the borrowings are of a short term nature. Borrowings fair values are based on discounted cash flows using a current borrowing rate. They are classified as level 3 fair values in the fair value hierarchy due to the unobservable inputs, including own credit risk.

Employee Related Provisions

The Shire's obligations for employees' annual leave, long service leave and other employee leave entitlements are recognised as employee related provisions in the Statement of Financial Position.

Short-term employee benefits

Provision is made for the Shire's obligations for short-term employee benefits. Short-term employee benefits are benefits (other than termination benefits) that are expected to be settled wholly before 12 months after the end of the annual reporting period in which the employees render the related service, including wages, salaries and sick leave.

Short-term employee benefits are measured at the undiscounted amounts expected to be paid when the obligation is settled.

Obligations for short-term employee benefits such as wages, salaries and sick leave are recognised as a part of current trade and other payables in the statement of financial position.

Other long-term employee benefits

Long-term employee benefit provisions are measured at the present value of the expected future payments to be made to employees. Expected future payments incorporate anticipated future wage and salary levels, durations of service and employee departures and are discounted at rates determined by reference to market yields at the end of the reporting period on government bonds that have maturity dates that approximate the terms of the obligations.

Any remeasurements for changes in assumptions of obligations for other long-term employee benefits are recognised in profit or loss in the periods in which the changes occur.

The Shire's obligations for long-term employee benefits are presented as non-current provisions in its statement of financial position, except where the Shire does not have an unconditional right to defer settlement for at least 12 months after the end of the reporting period, in which case the obligations are presented as current provisions.

Provisions

Provisions are recognised when the Shire has a present legal or constructive obligation, as a result of past events, for which it is probable that an outflow of economic benefits will result and that outflow can be reliably measured. Provisions are measured using the best estimate of the amounts required to settle the obligation at the end of the reporting period.

SIGNIFICANT ACCOUNTING POLICIES

**Capital Commitments****Leases**

At inception of a contract, the Shire assesses if the contract contains or is a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

At the commencement date, a right-of-use asset is recognised at cost and lease liability at the present value of the lease payments that are not paid at that date. The lease payments are discounted using the interest rate implicit in the lease, if that rate can be readily determined. If that rate cannot be readily determined, the Shire uses its incremental borrowing rate.

All contracts that are classified as short-term leases (i.e. a lease with a term of 12 months or less) and leases of low value assets are recognised as an operating expense on a straight-line basis over the term of the lease.

Right-of-use assets – valuation measurement

Right-of-use assets are measured at cost. This means that all right-of-use assets (other than vested improvements) under zero cost concessionary leases are measured at zero cost (i.e. not included in the Statement of Financial Position). The exception is vested improvements on concessionary land leases such as roads, buildings or other infrastructure which are reported at fair value.

Right-of-use assets – depreciation

Right-of-use assets are depreciated over the lease term or useful life of the underlying asset, whichever is the shorter. Where a lease transfers ownership of the underlying asset, or the cost of the right-of-use asset reflects that the Shire anticipates to exercise a purchase option, the specific asset is amortised over the useful life of the underlying asset.

The Shire as a Lessor

Upon entering into each contract as a lessor, the Shire assesses if the lease is a finance or operating lease.

The contract is classified as a finance lease when the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee. All other leases not within this definition are classified as operating leases. Rental income received from operating leases is recognised on a straight-line basis over the term of the specific lease.

Initial direct costs incurred in entering into an operating lease (e.g. legal cost, cost to setup) are included in the carrying amount of the leased asset and recognised as an expense on a straight-line basis over the lease term.

When a contract is determined to include lease and non-lease components, the Shire applies AASB 15: Revenue from Contracts with Customers to allocate the consideration under the contract to each component.

SIGNIFICANT ACCOUNTING POLICIES

**Joint Arrangements****Interests in joint arrangements**

Joint arrangements represent the contractual sharing of control between parties in a business venture where unanimous decisions about relevant activities are required.

Separate joint venture entities providing joint ventures with an interest to net assets are classified as a joint venture and accounted for using the equity method.

Joint venture operations represent arrangements whereby joint operators maintain direct interests in each asset and exposure to each liability of the arrangement. The Shire's interests in the assets, liabilities, revenue and expenses of joint operations are included in the respective line items of the financial statements.

Joint operations

A joint operation is a joint arrangement where the Shire has joint control with another party to the joint arrangement. All parties to joint arrangement have rights to the assets, and obligations for the liabilities relating to the arrangement.

Assets, liabilities, revenues and expenses relating to the Shire's interest in the joint operation are accounted for in accordance with the relevant Australian Accounting Standard.

Investment in Associates

An associate is an entity over which the Shire has the power to participate in the financial and operating policy decisions of the investee but not control or joint control of those policies.

Investments in associates are accounted for using the equity method. The equity method of accounting, is whereby the investment is initially recognised at cost and adjusted thereafter for the post-acquisition change in the Shire's share of net assets of the associate. In addition, the Shire's share of the profit or loss of the associate is included in the Shire's profit or loss.

Investment properties

Investment properties are principally freehold buildings, held for long-term rental yields and not occupied by the Shire. Investment properties are carried at fair value.

Changes in the fair value of investment properties are recorded as other revenue.

SIGNIFICANT ACCOUNTING POLICIES

**OTHER SIGNIFICANT ACCOUNTING POLICIES****(a) Goods and services tax (GST)**

Revenues, expenses and assets are recognised net of the amount of GST, except where the amount of GST incurred is not recoverable from the Australian Taxation Office (ATO).

Receivables and payables are stated inclusive of GST receivable or payable. The net amount of GST recoverable from, or payable to, the ATO is included with receivables or payables in the statement of financial position.

Cash flows are presented on a gross basis. The GST components of cash flows arising from investing or financing activities which are recoverable from, or payable to, the ATO are presented as operating cash flows.

(b) Current and non-current classification

The asset or liability is classified as current if it is expected to be settled within the next 12 months, being the Shire's operational cycle. In the case of liabilities where the Shire does not have the unconditional right to defer settlement beyond 12 months, such as vested long service leave, the liability is classified as current even if not expected to be settled within the next 12 months. Inventories held for trading are classified as current or non-current based on the Shire's intentions to release for sale.

(c) Rounding off figures

All figures shown in this annual financial report, other than a rate in the dollar, are rounded to the nearest dollar. Amounts are presented in Australian Dollars.

(d) Comparative figures

Where required, comparative figures have been adjusted to conform with changes in presentation for the current financial year.

When the Shire applies an accounting policy retrospectively, makes a retrospective restatement or reclassifies items in its financial statements that has a material effect on the statement of financial position, an additional (third) statement of financial position as at the beginning of the preceding period in addition to the minimum comparative financial statements is presented.

(e) Budget comparative figures

Unless otherwise stated, the budget comparative figures shown in this annual financial report relate to the original budget estimate for the relevant item of disclosure.

(f) Superannuation

The Shire contributes to a number of superannuation funds on behalf of employees. All funds to which the Shire contributes are defined contribution plans.

(g) Fair value of assets and liabilities

Fair value is the price that the Shire would receive to sell the asset or would have to pay to transfer a liability, in an orderly (i.e. unforced) transaction between independent, knowledgeable and willing market participants at the measurement date.

As fair value is a market-based measure, the closest equivalent observable market pricing information is used to determine fair value. Adjustments to market values may be made

SIGNIFICANT ACCOUNTING POLICIES



having regard to the characteristics of the specific asset or liability. The fair values of assets that are not traded in an active market are determined using one or more valuation techniques. These valuation techniques maximise, to the extent possible, the use of observable market data.

To the extent possible, market information is extracted from either the principal market for the asset or liability (i.e. the market with the greatest volume and level of activity for the asset or liability) or, in the absence of such a market, the most advantageous market available to the entity at the end of the reporting period (i.e. the market that maximises the receipts from the sale of the asset after taking into account transaction costs and transport costs).

For non-financial assets, the fair value measurement also takes into account a market participant's ability to use the asset in its highest and best use or to sell it to another market participant that would use the asset in its highest and best use.

(h) Fair value hierarchy

AASB 13: Fair Value Measurement requires the disclosure of fair value information by level of the fair value hierarchy, which categorises fair value measurement into one of three possible levels based on the lowest level that an input that is significant to the measurement can be categorised into as follows:

Level 1 - Measurements based on quoted prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at the measurement date.

Level 2 - Measurements based on inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly or indirectly.

Level 3 - Measurements based on unobservable inputs for the asset or liability.

The fair values of assets and liabilities that are not traded in an active market are determined using one or more valuation techniques. These valuation techniques maximise, to the extent possible, the use of observable market data. If all significant inputs required to measure fair value are observable, the asset or liability is included in Level 2. If one or more significant inputs are not based on observable market data, the asset or liability is included in Level 3.

Valuation techniques

The Shire selects a valuation technique that is appropriate in the circumstances and for which sufficient data is available to measure fair value. The availability of sufficient and relevant data primarily depends on the specific characteristics of the asset or liability being measured. The valuation techniques selected by the Shire are consistent with one or more of the following valuation approaches:

Market approach

Valuation techniques that use prices and other relevant information generated by market transactions for identical or similar assets or liabilities.

Income approach

Valuation techniques that convert estimated future cash flows or income and expenses into a single discounted present value.

SIGNIFICANT ACCOUNTING POLICIES

Cost approach

Valuation techniques that reflect the current replacement cost of the service capacity of an asset.

Each valuation technique requires inputs that reflect the assumptions that buyers and sellers would use when pricing the asset or liability, including assumptions about risks. When selecting a valuation technique, the Shire gives priority to those techniques that maximise the use of observable inputs and minimise the use of unobservable inputs. Inputs that are developed using market data (such as publicly available information on actual transactions) and reflect the assumptions that buyers and sellers would generally use when pricing the asset or liability are considered observable, whereas inputs for which market data is not available and therefore are developed using the best information available about such assumptions are considered unobservable.

(i) Impairment of assets

In accordance with Australian Accounting Standards the Shire's cash generating non-specialised assets, other than inventories, are assessed at each reporting date to determine whether there is any indication they may be impaired.

Where such an indication exists, an impairment test is carried out on the asset by comparing the recoverable amount of the asset, being the higher of the asset's fair value less costs to sell and value in use, to the asset's carrying amount.

Any excess of the asset's carrying amount over its recoverable amount is recognised immediately in profit or loss, unless the asset is carried at a revalued amount in accordance with another Standard (e.g., AASB 116: Property, Plant and Equipment) whereby any impairment loss of a revalued asset is treated as a revaluation decrease in accordance with the other standard.

For non-cash generating specialised assets that are measured under the revaluation model, such as roads, drains, public buildings and the like, no annual assessment of impairment is required. Rather AASB: Property, Plant and Equipment s116.31 applies and revaluations need only be made with sufficient regularity to ensure the carrying value does not differ materially from that which would be determined using fair value at the ends of the reporting period.

GUIDELINES

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Australian Accounting Standards

STATUTORY ENVIRONMENT

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Australian Accounting Standards

SIGNIFICANT ACCOUNTING POLICIES



Record of Policy Review						
Version	Author	Council Adoption	Resolution	Reason for Review	Review Date	CEO Signature
01	Graeme Fardon	27/08/15	24-15/16	New Policy		
02	Tony Merillo	31/08/16	SCM4-16/17	Revised		
03	Tony Merillo	24/08/17	28-17/18	Revised		
04	Graeme Fardon	27/09/18	41-18/19	<i>Policy Review Project – 5/09/2018</i>		
05	Nathan Gilfellon	17/12/20	97-20/21	FIN.3 to be rescinded and FIN.3.1 to replace the existing policy	Dec 2020	
06	Leah Horton	15/12/22		Biennial Policy Review – Amendments to match the most current Budget and Annual Financial Report templates	Dec 2022	

7.2 Investment Policy - Two year review

Responsible Officer	Nicole Gibbs, Chief Executive Officer
Reporting Officer	Leah Horton, Executive Manager, Corporate Services
Attachments	1. Investment Policy [DRAFT] ↓
Voting Requirements	Simple Majority
Disclosure of Interest	Reporting Officer: Nil. Responsible Officer: Nil

OFFICER RECOMMENDATION

That the Audit & Risk Committee recommends to Council for Council to endorse the two-year review of the Investment Policy.

IN BRIEF

- The Shire of Quairading has an Investment Policy which was last reviewed in December 2020.
- Shire policies are required to be reviewed every two years.
- Minor amendments and new policies can be considered and adopted by Council at any time.
- Senior management have undertaken a review of the current policy and is presenting the revision for committee consideration for recommendation to Council.
- This policy has been reviewed and updated in December 2022.

MATTER FOR CONSIDERATION

For the Audit and Risk Committee to recommend to Council for Council to endorse the two-year review of the Investment Policy.

BACKGROUND

In accordance with section 2.7(2)(b) of the *Local Government Act 1995*, Council is to determine the local government's policies. Reviewing these documents on a regular basis ensures policies reflect current operating practices and procedures and legislative change.

The Audit & Risk Committee, as a committee of Council, is able to review new policies and policy amendments and make recommendation of policy adoption to Council.

The 2020 review of the Investment Policy saw no changes made to the policy.

STATUTORY ENVIRONMENT

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Australian Accounting Standards

POLICY IMPLICATIONS

Investment Policy

Delegation 1.1.13: Payments from the municipal or trust funds

FINANCIAL IMPLICATIONS

The financial implications in this policy are low as the policy takes a reasonably 'low risk' stance.

The interest received from the Shire's investment portfolio is contained within the 2022/23 budget.

ALIGNMENT WITH STRATEGIC PRIORITIES

5.4 Governance & Leadership: Implement systems and processes that meet legislative and audit obligations

5.3 Governance & Leadership: Provide informed and transparent decision making that, meets our legal obligations, and the needs of our diverse community

CONSULTATION

Nil.

RISK ASSESSMENT

	Option 1
Financial	Low <i>The content within the Investment Policy covers areas of financial risk to the Shire. However, by having the policy, risks are minimised.</i>
Health	Low
Reputation	Low <i>The development and regular review of policies ensures a consistent and adopted approach for the Shire to effectively achieve strategic objectives contained within the key result areas of the Strategic Community Plan.</i>
Operations	Low <i>The content within the Investment Policy has an aspect of risk to operations. The overall impact of the policy is an attempt to mitigate the level of risk to the Shire through sound governance and management policy.</i>
Natural Environment	Low

	Consequence				
Likelihood	Insignificant	Minor	Moderate	Major	Critical
Rare	LOW Accept the risk Routine management	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Unlikely	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Possible	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review
Likely	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review	EXTREME Monthly senior management review
Almost certain	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	EXTREME Monthly senior management review	EXTREME Monthly senior management review

COMMENT

Shire policies are reviewed biannually to ensure that they are still consistent with Council’s current stance, preference and consistent with current legislation.

A number of minor amendments have been made throughout the Investment Policy in relation to formatting, spelling and grammar. These amendments are considered to be minor as they do not alter the purpose or objective of the policy.

More detailed amendments, alterations and inclusions have been made throughout the policy to ensure that the policy was reflective of the most current practice. The existing policy was compared to policies of other local governments and the data contained within was researched to ensure that the information was up to date.

Further information was added for clarity to objective (a) and objective (c), and annexure A – definitions was expanded with an introductory paragraph for each rating type.

A section entitled ‘supplementary considerations’ was added to ensure that the Shire is considering more than just financial returns in relation to investment practices. This was added in response to the increased awareness of local governments having a significant role to play in helping business to be more socially and environmentally responsible, and that a broad corporate social responsibility approach can lead to better relationships with the business community, as well as improved efficiencies, environmental and social performance.

Even with these changes, the amendments are considered to be minor as they do not alter the purpose or objective of the policy, and overall there were no errors or omissions from the previous policy that would indicate a major change in policy.

The next review is scheduled for December 2024, or earlier in the instance that there are major changes in Shire operations or the legislation that presides over this policy.

INVESTMENT POLICY

PURPOSE

This policy is to ensure that there are effective and accountable systems in place to safeguard the Shire's financial resources. This includes the development of proper systems to authorise, verify and record the investment of monies in appropriate financial instruments.

This policy ensures the Council and all officers entrusted with a role in the investment of the Shire's funds act with the highest regard for their fiduciary duties.

OBJECTIVE

The policy on investment of surplus funds is intended to reflect the intention of Council to minimise the possibility of incurring capital loss on any investment whilst providing a reasonable rate of return.

The objectives of the Policy on investment of surplus funds are: -

- a. To provide maximum capital preservation of funds.

All investments are to be made in a manner that seeks to ensure security and safeguard the portfolio by effectively managing credit risk and interest rate risk within identified parameters.

- b. To provide the best available rate of interest from an approved source.
- c. To ensure sufficient liquidity to meet Council's cash flow requirements.

Proper consideration is to be given to the present and likely future daily operational cash requirements of the Shire when selecting investments.

POLICY & PROCEDURE

1. Authorised Institutions

Investments are limited to authorised institutions, in accordance with *Local Government (Financial Management) Regulations Section 19C*, being: -

- a. Authorised deposit-taking institution as defined in the *Banking Act 1959* (Commonwealth) section 5; or
- b. The Western Australian Treasury Corporation established by the *Western Australian Treasury Corporation 1986*.

2. Authorised Investments

The only types of authorised investments under *Local Government Act 1995* - section 6.14(1), and *Local Government (Financial Management) Regulations 1996* – Regulation 19C, are as follows: -

- a. Deposits with an authorised institution and the term is to be no more than 36 months;
- b. Bonds that are guaranteed by the Commonwealth Government, or a State or Territory government with a term to maturity of up to 3 years; and
- c. Australian currency only.

INVESTMENT POLICY



3. Prohibited Investments

This investment policy prohibits any investment carried out for speculative purposes including: -

- Derivative based instruments;
- Principal only investments or securities that provide potentially nil or negative cash flow; and
- Stand-alone securities issued that have underlying futures, options, forwards contracts and swaps of any kind.

This policy also prohibits the use of leveraging (borrowing to invest) of an investment.

4. Risk Management Guidelines

Investments obtained are to comply with the two (2) key criteria relating to: -

- Portfolio Credit Framework:** Limit overall exposure of the portfolio as a whole, according to credit rating.
- Term to Maturity Framework:** limits based upon maturity of securities to ensure adequate working capital needs are met.

If any of the Council's investments are downgraded such that they no longer fall within the investment policy, they are to be divested as soon as practicable. Investments fixed for greater than 12 months are to be reviewed on a regular term and invested for no longer than 3 years.

Portfolio Credit Framework

To control the credit quality on the entire portfolio, the following credit framework limits the percentage of the portfolio exposed to any particular credit rating category.

S&P Long Term Rating	S&P Short Term Rating	Fitch Ratings	Maximum % in Credit rating Category
AAA	A-1+	AAA	100%
AA	A-1	AA	100%
A	A-2	A	60%
BBB	A-3	BBB	40%

Term to Maturity Framework

The investment portfolio is to be invested within the following maturity constraints: -

Investment Type	0 to 3 Months		3 to 6 Months		6 to 12 Months		1 to 2 years		2 to 3 years	
	Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.
Deposit with ADI – Maximum 36 months	15%	100%	0%	60%	0%	40%	0%	20%	0%	10%
Government Bonds	0%	20%	0%	20%	0%	20%	0%	20%	0%	10%

INVESTMENT POLICY

**5. Reporting to Council**

A monthly report is to be provided to Council. The report is to detail the investment portfolio in terms of holdings and impact of changes in market value since the previous report. The monthly report may also detail the investment income earned versus budget year to date and confirm compliance of Council's investments within legislative and policy limits. Council may nominate additional content for reporting.

6. Delegated Authority

That, under section 6.10 of the *Local Government Act 1995*, and as prescribed in regulation 19 of the *Local Government (Financial Management) Regulations 1996*, the CEO be delegated to administer the Investment Policy.

7. Prudent Person Standard

The investment will be managed with the care, diligence and skill that a prudent person would exercise. Officers are to manage the investment portfolio to safeguard it in accordance with spirit of this policy.

8. Ethics and Conflicts of Interest

Officers shall refrain from personal activities that would conflict with the proper execution and management of Council's investment portfolio.

This policy requires officers to disclose any conflict of interest to the CEO.

SUPPLEMENTARY CONSIDERATIONS**Corporate Social Responsibility**

In making investment decisions, consideration may be given to the corporate social responsibility profile of the financial institutions with whom the Shire invests.

It is emphasised that this is a subjective criteria and may only be taken into account when making investment decisions **after** all of the objectives of this policy have been met.

Where this criteria is exercised, the justification for applying it should be recorded for future audit purposes.

Transaction Costs & Administrative Matters

The administrative, banking and reporting costs that may be associated with the particular financial instrument are to be considered in selecting an appropriate financial instrument.

INVESTMENT POLICY

**SCOPE**

The policy applies to any investment of surplus funds other than bank deposits for operational purposes.

Legislative and Strategic Context

Legislation covering investment of surplus funds includes:

- a. *Local Government Act 1995* Section 6.14.
- b. The *Trustees Act 1962* – Part III Investments as amended by the Trustees Amendment Act.
- c. *Local Government (Financial Management) Regulations 1996* – Regulation 19, Regulation 19C, Regulation 28 and Regulation 49.
- d. Australian Accounting Standards.

GUIDELINES**Legislative Requirements**

All investments are to be made in accordance with and to comply with the following:

- a. *Local Government Act 1995* - Section 6.14;
- b. *Trustees Act 1962* - Part III Investments;
- c. *Bank Act 1959*;
- d. *Local Government (Financial Management) Regulations 1996* - Regulation 19C, 28, and 49; and
- e. Australian Accounting Standards

Annexure A – Definitions**STATUTORY ENVIRONMENT**

Local Government Act 1995

Local Government (Financial Management) Regulations 1996 - Regulation 19C, 28, and 49; and

Australian Accounting Standards

Record of Policy Review						
Version	Author	Council Adoption	Resolution	Reason for Review	Review Date	CEO Signature
01	Graeme Fardon	26/08/10	32-100/11	New Policy		
02	Graeme Fardon	31/05/12	226-11/12	Revised		
03	Graeme Fardon	27/09/12	58-12/13	Revised		
04	Graeme Fardon	29/05/14	192-13/14	Revised		
05	Graeme Fardon	27/09/18	41-18/19	<i>Policy Review Project – 5/09/2018</i>		
06	Graeme Fardon	17/12/20	97-20/21	Biennial Policy Review	Dec 2020	
07	Leah Horton	15/12/22		Biennial Policy Review	Dec 2022	



ANNEXURE A – DEFINITIONS

Standard & Poor's Rating Guide

S&P Global Ratings credit rating symbols provide a simple, efficient way to communicate creditworthiness and credit quality. The S&P global rating scale provides a benchmark for evaluating the relative credit risk of issuers and issues worldwide.

General Summary of the Opinions Reflected by S&P Ratings

- a. **'AAA'** Extremely strong capacity to meet financial commitments. Highest rating
- b. **'AA'** Very strong capacity to meet financial commitments
- c. **'A'** Strong capacity to meet financial commitments, but somewhat susceptible to adverse economic conditions and changes in circumstances
- d. **'BBB'** Adequate capacity to meet financial commitments, but more subject to adverse economic conditions
- e. **'BBB-'** Considered lowest investment grade by market participants

Fitch Ratings

Fitch Ratings publishes credit ratings that are forward-looking opinions on the relative ability of an entity or obligation to meet financial commitments. Financial Institutions Viability Ratings (VRs) measure the intrinsic creditworthiness of a bank or non-bank financial institution and reflect Fitch's opinion on the likelihood that the entity will fail.

- a. **aaa:** Highest fundamental credit quality

'aaa' ratings denote the best prospects for ongoing viability and lowest expectation of failure risk. They are assigned only to banks with extremely strong and stable fundamental characteristics, such that they are most unlikely to have to rely on extraordinary support to avoid default. This capacity is highly unlikely to be adversely affected by foreseeable events.
- b. **aa:** Very high fundamental credit quality

'aa' ratings denote very strong prospects for ongoing viability. Fundamental characteristics are very strong and stable; such that it is considered highly unlikely that the bank would have to rely on extraordinary support to avoid default. This capacity is not significantly vulnerable to foreseeable events.
- c. **A:** High fundamental credit quality

'a' ratings denote strong prospects for ongoing viability. Fundamental characteristics are strong and stable, such that it is unlikely that the bank would have to rely on extraordinary support to avoid default. This capacity may, nevertheless, be more vulnerable to adverse business or economic conditions than is the case for higher ratings.
- d. **Bbb:** Good fundamental credit quality

'bbb' ratings denote good prospects for ongoing viability. The bank's fundamentals are adequate, such that there is a low risk that it would have to rely on extraordinary support to avoid default. However, adverse business or economic conditions are more likely to impair this capacity.

7.3 Rates Collection Policy - Two year review

Responsible Officer	Nicole Gibbs, Chief Executive Officer
Reporting Officer	Leah Horton, Executive Manager, Corporate Services
Attachments	1. Rates Collection Policy [DRAFT] ↓
Voting Requirements	Simple Majority
Disclosure of Interest	Reporting Officer: Nil. Responsible Officer: Nil.

OFFICER RECOMMENDATION

That the Audit & Risk Committee recommends to Council for Council to endorse the two-year review of the Rates Collection Policy.

IN BRIEF

- The Shire of Quairading has a Rates Collection Policy which was last reviewed in December 2020.
- Shire policies are required to be reviewed every two years.
- Minor amendments and new policies can be considered and adopted by Council at any time.
- Senior management have undertaken a review of the current policy and is presenting the revision for committee consideration for recommendation to Council.
- This policy has been reviewed and updated in December 2022.

MATTER FOR CONSIDERATION

For the Audit and Risk Committee to recommend to Council for Council to endorse the two-year review of the Rates Collection Policy.

BACKGROUND

In accordance with section 2.7(2)(b) of the *Local Government Act 1995*, Council is to determine the local government's policies. Reviewing these documents on a regular basis ensures policies reflect current operating practices and procedures and legislative change.

The Audit & Risk Committee, as a committee of Council, is able to review new policies and policy amendments and make recommendation of policy adoption to Council.

The 2020 review of the Rates Collection Policy saw one very minor change (addition) to the policy.

STATUTORY ENVIRONMENT

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Australian Accounting Standards

Rates and Charges (Rebates and Deferrals Act) 1992

Delegation 1.1.16: Rate Record Amendment

Delegation 1.1.17: Agreement as to payment of rates & service charges

Delegation 1.1.18: Determine Due Date for Rates or Service Charges

Delegation 1.1.19: Recovery of Rates or Service Charges

Delegation 1.1.20: Recovery of Rates Debts: Actions to Take Possession of the Land

POLICY IMPLICATIONS

Rates Collection Policy

FINANCIAL IMPLICATIONS

Debt collection expenses are recoverable against the rates assessment in contravention and debt collection expenses and reimbursements are both contained within the 2022/23 budget.

A provision for rates write-off is contained within the 2022/23 budget, but is minimal in nature due to the historically low write-offs performed.

ALIGNMENT WITH STRATEGIC PRIORITIES

- 5.4 Governance & Leadership:** Implement systems and processes that meet legislative and audit obligations
- 5.3 Governance & Leadership:** Provide informed and transparent decision making that, meets our legal obligations, and the needs of our diverse community

CONSULTATION

Nil.

RISK ASSESSMENT

	Option 1
Financial	Low <i>The content within the Rates Collection Policy covers areas of financial risk to the Shire. However, by having the policy, risks are minimised.</i>
Health	Low
Reputation	Low <i>The development and regular review of policies ensures a consistent and adopted approach for the Shire to effectively achieve strategic objectives contained within the key result areas of the Strategic Community Plan.</i>
Operations	Low <i>The content within the Rates Collection Policy has an aspect of risk to operations. The overall impact of the policy is an attempt to mitigate the level of risk to the Shire through sound governance and management policy.</i>
Natural Environment	Low

	Consequence				
Likelihood	Insignificant	Minor	Moderate	Major	Critical
Rare	LOW Accept the risk Routine management	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Unlikely	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Possible	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review
Likely	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review	EXTREME Monthly senior management review
Almost certain	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	EXTREME Monthly senior management review	EXTREME Monthly senior management review

COMMENT

Shire policies are reviewed biannually to ensure that they are still consistent with Council’s current stance, preference and consistent with current legislation.

A number of minor amendments have been made throughout the Rates Collection Policy in relation to formatting, spelling and grammar. These amendments are considered to be minor as they do not alter the purpose or objective of the policy.

More detailed amendments, alterations and inclusions have been made throughout the policy to ensure that the policy was reflective of the most current practice. The existing policy was compared to policies of other local governments and the data contained within was researched to ensure that the information was up to date.

The policy was also compared to the rates conditions endorsed in the 2022/23 budget, and the Shire’s delegations register. Changes to the delegations register in March 2022 provided more rates authority to the Executive Manager Corporate Services, which is reflected in the policy alterations.

The section under 2.1(b) Sale of property was edited from five (5) years to three (3) years in relation to Council being entitled to take possession of land in the circumstance of unpaid rates. This was amended to align to legislation (section 6.64 of the *Local Government Act 1995*). It is assumed that the term of five (5) years was an oversight in the previous iteration of the policy and that the legislated term should take precedent. It is noted that resolution 10-19/20 from July 2019 utilised the ‘three year rule’ under this section of the act, so again it is assumed that the reference to five (5) years was an oversight. Furthermore delegation 1.1.20: Recovery of Rates Debts: Actions to Take Possession of the Land complies with s6.64, being three years.

More significant amendments were made to section 5. Rates incentive scheme, as the former policy specified that the prize draw is to be conducted by ‘drawing out entry forms’, however a far more sophisticated methodology, complete with an audit trail is utilised through the SynergySoft accounting system’s electronic ‘Random Prize Draw’ contained within the rates module.

The addition of an ‘internal environment’ section was added to ensure that all applicable delegations relating to this policy are disclosed.

The next review is scheduled for December 2024, or earlier in the instance that there are major changes in Shire operations or the legislation that presides over this policy.

RATES COLLECTION POLICY

PURPOSE

To provide guidance in the recovery of all rates revenue owed to the Shire, including outstanding rates, rubbish charges and ESL charges, as the Shire requires reliable revenue streams in order to meet the service provisions of the organisation.

To enable the Shire to meet its service obligations, it is necessary to ensure that revenues are received in a timely manner. The Shire is required to ensure that where revenue is not received in a timely manner, that appropriate measures are undertaken to recover outstanding amounts.

As a means to encourage the early payment of rates in full, the Shire may offer and administer a 'rates incentive scheme'. This scheme provides eligible ratepayers with the opportunity to win prizes for prompt and full payment.

OBJECTIVE

To provide a framework for the efficient and effective collection of outstanding rates and charges debts to reduce the likely occurrence of unrecoverable debts and to ensure consistency for all debt collection activities, whilst treating all people respectfully, fairly and consistently, and to fulfil statutory requirements in relation to the collection of rates and charges.

POLICY

1. Recovery of rates, service and ESL charges

The recovery of outstanding rates will be collected in a fair and timely manner. Rate notices are due for payment 35 days from date of issue in accordance with the *Local Government Act 1995*.

1.1 Amounts that remain outstanding past the prescribed due date will have interest applied.

Interest is calculated on the number of days from the due date of payment until the day the payment is received by the Shire of Quairading. This includes overdue amounts where the rate payer has elected to pay by an instalment option.

1.2 Accounts unpaid by the due date shown on the rate notice

Where accounts remain outstanding after the prescribed due date, a final notice shall be issued requesting full payment within fourteen (14) days, unless the rate payer has entered into a payment arrangement which has been agreed upon by both parties.

Final notices are not to be issued to eligible persons registered to receive a pensioner or senior rebate under the *Rates and Charges (Rebates and Deferments) Act 1992*, as such persons have until the 30th June of the current financial year to make payment, without incurring any penalty interest. Final notices will, however, be issued to registered pensioners or seniors where there are unpaid charges which are not subject to a rebate or deferment e.g. rubbish collection charges.

RATES COLLECTION POLICY

**1.3 Accounts unpaid after the expiry date shown on the final notice**

Where amounts remain outstanding after the expiry date shown on the final notice, recovery action will commence based upon a risk management approach as determined by the value and type of debt and may include such action as referral to Council's debt collection agency.

1.4 Seizure of rent for non-payment of rates

Where the property owner of a leased or rented property on which rates and service charges are outstanding cannot be located or refuses to settle rates and service charges owed, a notice may be served on the lessee or tenant under the provisions of section 6.60 of the *Local Government Act 1995* requiring the lessee or tenant to pay to the Shire the rent due that they would otherwise pay under the lease/tenancy agreement as it becomes due, until the amount in arrears has been paid.

1.5 Options to recover rates debt where rates are in arrears for in excess of (3) years

Under the guidance of the Shire's debt collection service provider, legal action may be undertaken to recover outstanding rates and charges. This action may include general procedure claims and property seizure and sale orders (PSSO). Any costs incurred in undertaking legal action in a Court of competent jurisdiction are recoverable from ratepayers under section 6.56 of the *Local Government Act 1995*.

2. Alternative payment arrangement

Where ratepayers are unable to make payment of their rates by one of the prescribed instalment options, they may apply for a special payment arrangement in order to avoid legal action for recovery. Special payments arrangements are to involve regular weekly, fortnightly or monthly repayments of a fixed amount, and are to achieve full payment of outstanding rates by the end of the financial year. A minimum payment of an equivalent of \$25 per week is to apply. Special payment arrangements will incur a one-off administration fee in accordance with Council's adopted fees and charges. Interest on overdue amounts (arrears) will continue to accrue at the prevailing interest rate as set out in the adopted fees & charges.

Each alternative payment arrangement requires the approval of the Chief Executive Officer or Executive Manager Corporate Services in accordance with Delegation 1.1.17 – Agreement as to Payment of Rates and Service Charges.

2.1 Options to recover rates debt where rates are in arrears for in excess of three (3) years.**(a) Lodging a caveat on the title for land**

If rates and service charges which are due to Council in respect of any rateable land have been unpaid for at least three (3) years a caveat may be registered on the title for the land, under the provisions of Section 6.64 (3) of the *Local Government Act 1995*. The approval of Council is required before this course of action is undertaken.

(b) Sale of property

If rates and service charges which are due to Council in respect of any rateable land have been unpaid for at least three (3) years, Council may take possession of the land under the provisions of Section 6.64 of the *Local Government Act 1995*. The approval of Council is required to be obtained before this course of action is undertaken.

RATES COLLECTION POLICY

**3. Write off debts**

Financial hardship is not a ground to write off debt. Where a person is experiencing financial hardship and is unable to pay their outstanding debt, the Shire may assist the applicant, where applicable, to negotiate an alternative payment arrangement.

All write-offs will be presented to Council for consideration and will include:

- (a) Name of debtor / rate payer
- (b) Amount to be written off
- (c) Description of invoice / assessment number
- (d) Reason for write-off.

For a debt to be written off one of the following conditions must be satisfied:

- (a) The debtor cannot be located
- (b) Uneconomical to pursue the debt
- (c) The hardship circumstances of the debtor do not warrant the taking or continuation of recovery action
- (d) Legal proceedings through the courts have proved, or on legal advice would prove, unsuccessful.
- (e) The write-off of the debt will result in a favourable outcome to the Council.

4. Management reporting

Rates debtors:

Management are required to maintain a status report of recovery action against all rates in arrears of more than one year.

5. Rates incentive scheme

A rate incentive scheme, in the form of prizes donated by sponsors or by the Shire, will be operated in each rating year on the basis that:

- (a) Only those who have paid their rates in full, within thirty-five (35) days of the date of issue, be eligible for an entry in the draw.
- (b) The winners to be randomly selected using the Shire's computerised program within the rates module of the Enterprise resource planning (ERP) software, currently SynergySoft.
- (c) The prize draw to be administered and supervised by the Chief Executive Officer or Executive Manager Corporate Services.
- (d) Council to allocate a budget to provide/subsidise a rates incentive scheme.

RATES COLLECTION POLICY

**GUIDELINES**

Local Government Act 1995: Part 6, Division 4, Clause 6.13 - Interest on money owing to local governments

Local Government Act 1995: Part 6, Division 6, Subdivision 4, Clause 6.45 – Options for payment of rates and service charges

Local Government Act 1995: Part 6, Division 6, Subdivision 4, Clause 6.51 - Accrual of interest on overdue rates or service charges

Local Government Act 1995: Part 6, Division 6, Subdivision 5, Clause 6.56 - Rates or service charges recoverable in court

Local Government Act 1995: Part 6, Division 6, Subdivision 5, Clause 6.60 - Local government may require lessee to pay rent

Local Government Act 1995: Part 6, Division 6, Subdivision 6, Clause 6.64 - Actions to be taken

Local Government (Financial Management) Regulations 1996

Rates and Charges (Rebates and Deferments) Act 1992

STATUTORY ENVIRONMENT

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Rates and Charges (Rebates and Deferments) Act 1992

INTERNAL ENVIRONMENT

Delegation 1.1.16: Rate Record Amendment

Delegation 1.1.17: Agreement as to Payment of Rates & Service Charges

Delegation 1.1.18: Determine Due Date for Rates or Service Charges

Delegation 1.1.19: Recovery of Rates or Service Charges

Delegation 1.1.20: Recovery of Rates Debts: Actions to Take Possession of the Land

Record of Policy Review						
Version	Author	Council Adoption	Resolution	Reason for Review	Review Date	CEO Signature
01	Nathan Gilfellon	19/12/19	93-19/20	New Policy for consideration	Dec 2019	
02	Nathan Gilfellon	17/12/20	97-20/21	Biennial Policy Review – Minor Amendment	Dec 2020	
03	Leah Horton	15/12/22		Biennial Policy Review – Minor Amendment	Dec 2022	

7.4 Office of the Auditor General - Financial Audit Results: Local Government 2020/21

Responsible Officer	Nicole Gibbs, Chief Executive Officer
Reporting Officer	Leah Horton, Executive Manager, Corporate Services
Attachments	1. OAG Report 5: Local Government 2020/21 ↓
Disclosure of Interest	Reporting Officer: Nil. Responsible Officer: Nil.

Report 5: 2022-23 – 17th August 2022 (attached)

The Auditor General has recently had the report on the financial audit results for local government 2020/21 tabled in state parliament.

The 2020/21 financial audit was the first year the Auditor General had responsibility for all 148 local government audits, marking the end of the four-year transition provided in the Local Government Amendment (Auditing) Act 2017. Of the 148 audits, 21 were performed in-house by the OAG, and a further 127 were performed by contract audit firms on behalf of the OAG. It is expected that the number of in-house audits will increase over time.

The report on the 2020/21 financial audits contains the findings from 132 of the applicable 148 local government entities. The remaining 16 entities results will be tabled in parliament once their audits are completed.

The results of the audits of local government entities' annual financial reports, their compliance with applicable legislation and issues identified during these audits that are significant enough to bring to the attention of the parliament are detailed within the attached report.

The OAG report including findings and recommendations to local governments is submitted to the committee for noting and discussion.



Report 5: 2022-23 | 17 August 2022

FINANCIAL AUDIT RESULTS

Local Government 2020-21



Office of the Auditor General Western Australia

Audit team:

Grant Robinson
Lyndsay Fairclough
Financial Audit teams

National Relay Service TTY: 133 677
(to assist people with hearing and voice impairment)

We can deliver this report in an alternative format for those with visual impairment.

© 2022 Office of the Auditor General Western Australia.
All rights reserved. This material may be reproduced in whole or in part provided the source is acknowledged.

ISSN: 2200-1913 (print)
ISSN: 2200-1921 (online)

The Office of the Auditor General acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures, and to Elders both past and present.

Image credit: Tyler Olson/shutterstock.com

WESTERN AUSTRALIAN AUDITOR GENERAL'S REPORT

**Financial Audit Results –
Local Government 2020-21**

Report 5: 2022-23
17 August 2022

This page is intentionally left blank



**THE PRESIDENT
LEGISLATIVE COUNCIL**

**THE SPEAKER
LEGISLATIVE ASSEMBLY**

FINANCIAL AUDIT RESULTS – LOCAL GOVERNMENT 2020-21

Under section 24 of the *Auditor General Act 2006*, this report covers the final year of a four year transition for my Office to conduct the annual financial audits of the local government sector, following proclamation of the *Local Government Amendment (Auditing) Act 2017*.

This report on the 2020-21 financial audits of 132 of the applicable 148 local government entities includes:

- results of the audits of local government entities' annual financial reports and their compliance with applicable legislation for the financial year ending 30 June 2021
- issues identified during these annual audits that are significant enough to bring to the attention of the Parliament.

I wish to acknowledge the assistance provided by the councils, chief executive officers, finance officers and others, including my staff and contract audit firms, throughout the financial audit program and in finalising this report.

A handwritten signature in black ink, appearing to read 'C Spencer'.

CAROLINE SPENCER
AUDITOR GENERAL
17 August 2022

Contents

Auditor General's overview	7
Executive summary	8
Review of the four-year transition	8
Introduction	10
Year at a glance	11
Recommendations.....	13
Timeliness and quality of financial reporting	14
Reporting requirements	14
Review of financial reports submitted for audit	14
Recommendation	16
Summary of audit opinions	17
Two disclaimers of opinion for 2019-20	17
Response from Shire of Yalgoo.....	18
Two qualified audit opinions for 2020-21	18
Twenty-four entities received emphasis of matter paragraphs.....	18
Seventy-five entities had 193 material matters of non-compliance with legislation	19
Adverse trends in the financial position of 109 entities	20
We issued 275 audit certifications	20
Control weaknesses	22
Management controls.....	22
Recommendation	27
Information system controls.....	28
Issues impacting entity reporting	29
Rehabilitation of landfill sites	29
Recommendation	30
Valuation of assets.....	30
Developer contributions – Accounting for cash in lieu of public open space	31
Implementation of Service Concession Grantors Standard AASB 1059	32
Other changes to accounting standards	33

Impact of emergencies	34
COVID-19	34
Cyclone Seroja.....	37
Opportunities for the DLGSC to improve the efficiency of financial reporting	38
Quality and timeliness	38
Response from the DLGSC.....	39
Review of financial ratios.....	39
Response from the DLGSC.....	40
Reduced disclosure reporting by entities	40
Response from the DLGSC.....	41
Local Government Regulations Amendment (Financial Management and Audit) Regulations 2022	41
Recommendation	41
Appendix 1: Status and timeliness of 2020-21 audits	42
Appendix 2: 2019-20 disclaimers of opinion	48
Appendix 3: 2020-21 qualified opinions.....	49
Appendix 4: Emphasis of matter paragraphs included in auditor's reports	50
Appendix 5: Material matters of non-compliance with legislation.....	54
Appendix 6: Certifications issued.....	57
Appendix 7: Other opinions and certifications issued since 18 November 2021	62

Auditor General's overview

The 2020-21 financial year marked the end of a four-year transition of local government financial auditing to my Office. The transition has brought many challenges as local governments and regional councils (entities) adjusted to our robust audits and we have learnt about the intricacies of the sector. Despite the challenges, it has been rewarding to facilitate financial reporting improvements and increase transparency of this important layer of government which impacts all West Australians. I have included a brief review of the transition at the beginning of this report.



For the 2020-21 audit cycle, we have completed 132 of 148 audits by 30 June 2022, with 16 outstanding. We have seen a demonstrated effort by the sector to improve the quality and timeliness of their annual financial reports and pleasingly reported a 15% decrease in weaknesses in financial management controls. This follows a 12% decrease the year before. To see this reduction in management control issues, across a larger number of audited entities, shows a comprehensive response by the sector to improve their current practices and strengthen the integrity of their financial reporting environment.

However, two entities received a qualified opinion on their financial reports and there may be further qualifications on the opinions not yet issued. We also reported a higher rate of material non-compliance and information system control weaknesses than previously.

In this report I have also included previously unreported outstanding opinions from 2019-20 for the Shires of Wiluna and Yalgoo. For both entities I issued a disclaimer of opinion as I was unable to obtain sufficient appropriate audit evidence on their books and records because of deficiencies in their internal controls and record keeping. A disclaimer of opinion is a serious matter for my Office as there is a missed opportunity for assurance over financial accountability and continuous improvement. This leads to a lack of confidence in the appropriate use of public monies.

To support continuous improvement in the local government sector, I encourage entities to review the findings of their audits, as well as this audit results report. Each entity should consider our recommendations in the context of their own operating environments and governance frameworks.

I note the newfound willingness and leadership of the Department of Local Government, Sport and Cultural Industries to enhance financial reporting, reduce complexity and cost, and enable improved governance for the sector. This report also outlines its progress on our previous recommendations.

Finally, I wish to acknowledge my incredibly hardworking staff, our contract audit firm partners and staff in the audited entities for their dedication to this year's audit process. Your professionalism and cooperation in working through uncommon challenges to complete the audits is appreciated.

Executive summary

Review of the four-year transition

The 2020-21 financial audit was the first year the Auditor General had responsibility for all 148 local government audits, marking the end of the four-year transition provided in the *Local Government Amendment (Auditing) Act 2017*.

A challenging transition

The transition has not been easy for the Office of the Auditor General (OAG) or entities, but Parliament was correct to acknowledge that change and improvement was needed for the sector. In too many cases, the quality of both financial reporting and audit was not what ratepayers and communities would rightly expect.

Our audits have brought greater rigour, scrutiny and sector-wide oversight. While challenging for many local governments and regional councils (entities), they have responded positively, particularly when they have understood that this helps them provide better transparency, accountability and financial management.

How challenging entities have found it to adapt to our requirements and approach was not predictable. Many smaller entities, who we might have expected to struggle, have adapted relatively easily while some of the larger ones with greater capacity have found it difficult. This has been particularly interesting given that all entities, regardless of size and complexity have to comply with the same legislative and regulatory framework.

Setting the baseline

As is often the case, the initial stages of reform have revealed many of the issues that need fixing. For the local government sector this includes the quality and timeliness of financial reporting and the need to aim for better practice, not just meet minimum levels of compliance. Our office has prepared guidance on preparing financial statements¹ and other topics² which entities have been encouraged to use.

Achieving consistency in some key areas underpins ongoing improvement. One area we continue to report on each year³ is inconsistencies in property and asset valuation methodologies. Entities can see significant valuation swings depending on the valuer they appoint and the assumptions the valuer makes. While regulation changes mean a formal valuation is no longer required each year, entities still need to ensure their assets are recorded at fair value. Forthcoming guidance from the Australian Accounting Standards Board and in turn the Department of Local Government, Sport and Cultural Industries (DLGSC) may help.

Through the transition we have come to understand much better the extent of reporting and compliance required of entities, in some cases exceeding that required of the State government sector. We have advocated to, and worked with, the DLGSC for a reduction in these requirements and are pleased new model financial statements, with decreased reporting but without a loss of key disclosures, will be available for entities in 2022-23. We will continue to liaise with the DLGSC on other proposed reforms that aim to increase accountability, transparency and efficiency for the sector.

¹ Office of the Auditor General, [Western Australian Public Sector Financial Statements – Better Practice Guide](#), OAG, Perth, 2021.

² Office of the Auditor General, [‘Better Practice Guidance’](#), OAG, accessed August 2022.

³ Office of the Auditor General, [Audit Results Report – Annual 2017-18 Financial Audits of Local Government Entities](#), OAG, Perth, 2019, p. 20.

The transition has also identified areas of improvement for our Office. Specifically, we have had to increase the training of our employees and contract audit firms to adequately understand the local government environment, which differs in some significant ways to the State and tertiary sectors. We also intend to increase the time our auditors spend onsite to further improve the engagement, efficiency and timeliness of audits.

We are also determined not to allow any overruns from our State sector audits to impact our delivery of local government audits, as it did for the 2020-21 audit cycle (due to a record number of State government entity audit qualifications). This means if State entities are not audit-ready or we encounter delays undertaking their audits, our teams will move on to the local government program as scheduled, even if State entities are not finalised. Our resolve on this matter will be tested during the 2021-22 audits, but we look forward to reporting back to the Parliament and all our audited entities on how this approach unfolds.

Seeing results

While the timeliness and quality of annual financial reports have been significant issues through the transition, there are signs of improvement. The reduction since 2018-19 in financial management control weaknesses shows a clear effort by entities to improve their current practices and strengthen the integrity of their financial reporting environment. Although the upward trend in material matters on non-compliance indicates there is still improvement needed. The following table shows entities' audit results over the past four years.

Audit year	2017-18	2018-19	2019-20	2020-21
Number of entities subject to OAG audit	46	112	132	148
Clear audit opinions	44	107	129	130*
Qualified opinions	2	5	1	2*
Disclaimers of opinion	0	0	2	0*
Material matters of non-compliance	36	93	101	193*
Management control issues	198	802	704	601*

Source: OAG

* Some 2020-21 audits are still ongoing and therefore these results are for 132 entities only.

Table 1: Audit results for four year transition period

Understanding of the significant role of audit committees in the annual reporting and audit process has also improved. Better informed and active audit committees are now more suitably equipped to quality review the financial report and assess the accountability and integrity of entities' reporting, control environment and risk management practices.

Where to from here

There is still a long way to go but we are committed to working with entities, the DLGSC and sector associations⁴ to continue improving the sector and our own processes to aid timely reporting to the community and Parliament.

From the 2021-22 financial year audits we will recognise the top entities who demonstrate best practice in the sector, as we do for the State and tertiary sectors. Our best practice assessment criteria include:

⁴ Western Australian Local Government Association (WALGA) and Local Government Professionals Australia WA.

- clear opinions on financial reports and controls
- the number and significance of control weaknesses raised in management letters
- good quality financial reports, supported by reliable working papers and submitted for audit within the agreed timeframe
- management resolution of accounting standards and presentation issues
- availability of key staff during the audit process.

For 2020-21, OAG staff performed 21 audits in-house, with the other 127 performed by contract audit firms on our behalf. We expect to increase the number of audits we perform in-house over time. However, a large proportion will continue to be performed by our accredited contract audit firms. These are periodically re-tendered to provide open and fair competition and to ensure value for money.

Introduction

This report contains findings from our 2020-21 financial audits of the local government sector. It includes the results for 132 of the 148 entities (Appendix 1), with the remaining 16 entities' results to be tabled in Parliament once their audits are completed.

Our annual financial audits focus on providing assurance over an entity's financial report. The Auditor General provides an opinion on the report which can be:

- clear – this indicates satisfactory financial controls and that the financial report is based on proper accounts, presented fairly, complies with relevant legislation and applicable accounting standards, and fairly represents performance during the year and the financial position at year end
- clear with an emphasis of matter – this brings attention to a matter disclosed in the entity's financial report but is not significant enough to warrant a qualified opinion
- qualified – these opinions are given when the audit identifies that the financial report is likely to be misleading to users, controls were inadequate or there was a material conflict with applicable financial reporting frameworks
- disclaimer of opinion – issued when the auditor is unable to form an opinion due to insufficient evidence being available. This is the most serious audit opinion and is only issued after we have exhausted our efforts to achieve the desired audit objectives.

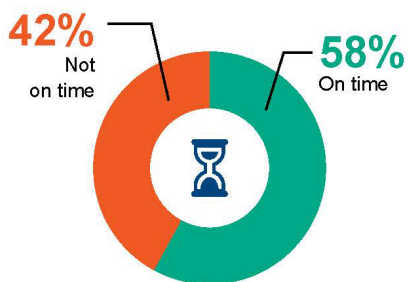
During an audit we also make recommendations to entities on relevant matters of compliance, financial management and information system controls. A summary of our findings is included in this report.

Also included are matters we have noted which have or may impact an entity's financial report. This year this includes how entities account for the rehabilitation of landfill sites, changes to the accounting treatment for cash in lieu of public open space from developer contributions, inconsistencies in how entities value assets and changes to accounting standards.

The appendix includes other opinions and certifications issued for the State government sector since 18 November 2021.

Year at a glance

Auditing local government



Audits completed by 31 December



148 local government entities



132 audits finalised and the results included in this report



21 entities audited by OAG staff



127 entities audited by contracted audit firms



The 132 entities with finalised audits had: **\$45 billion** of total reported assets



\$3.8 billion in total operating revenue

2.2 billion in rates

\$958 million in fees and charges

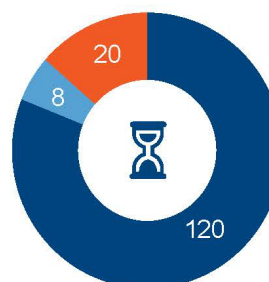
Quality and timeliness of financial reports (page 14)

Quality

Roughly half of the entities submitted financial statements for audit that were of a reasonable standard and required minimal revisions or adjustments. However, the remaining half were found to have numerous errors and disclosure requirements were unmet.

Timeliness

- Submitted to OAG by 30 September
- Received an extension and met deadline
- Did not meet 30 September or extension deadline



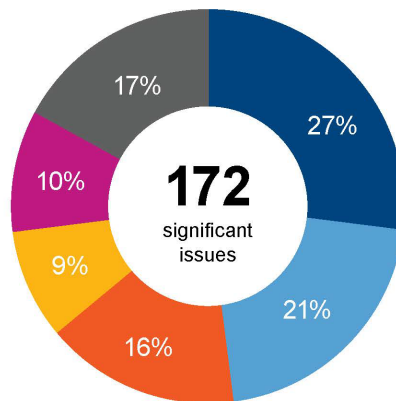
Audit results



601 management control issues
(page 22)

During 2020-21, we alerted 126 entities to control weaknesses that needed their attention. One hundred and seventy-two were rated as significant, 359 moderate and 70 minor.

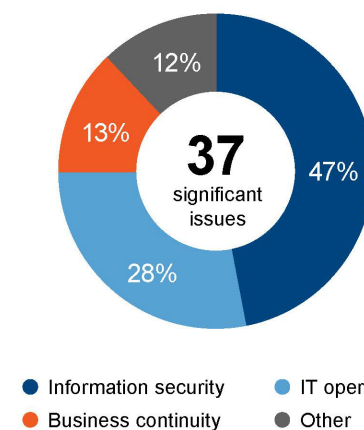
- Expenditure
- Financial management
- Payroll and human resources
- Asset management
- Revenue
- Other



193 Material matters of non compliance with legislation (page 19)



358 information system control weaknesses (page 28)



Issues impacting entity reporting



Rehabilitation of landfill sites (page 29)



Valuation of assets (page 30)



Developer contributions – Accounting for cash in lieu of public open space (page 31)



Accounting standard changes (page 32)

Recommendations

1. We encourage entities to make use of our *WA Public Sector Financial Statements – Better Practice Guide* (available at audit.wa.gov.au) to improve their financial management and reporting practices, processes and procedures (page 16).
2. Local government entities should ensure they maintain the integrity of their financial control environment by:
 - a. periodically reviewing and updating all financial, asset, human resources, governance, information systems and other management policies and procedures and communicating these to staff
 - b. conducting ongoing reviews and improvement of internal control systems in response to regular risk assessments
 - c. regularly monitoring compliance with relevant legislation
 - d. promptly addressing control weaknesses brought to their attention by our audits and other audit and review mechanisms
 - e. ensuring they consider new and revised accounting standards for their impact on financial operations to prepare a compliant financial report at year end (page 27).
3. The Department of Local Government, Sport and Cultural Industries should provide guidance to assist entities with understanding the requirements of and interpreting the Australian Accounting Standards Board (AASB) accounting requirements to ensure greater accounting consistency across the sector, including recognising provisions for the rehabilitation of landfills and other contaminated sites (page 30).
4. The Department of Local Government, Sport and Cultural Industries should continue to work with local government stakeholders towards the introduction of model financial statements for the 2022-23 financial year (page 41).

Timeliness and quality of financial reporting

Reporting requirements

Each entity is required to prepare an annual financial report that includes:

- a Statement of Financial Position, Statement of Comprehensive Income by Nature or Type, Statement of Comprehensive Income by Program, Statement of Changes in Equity and Statement of Cash Flows
- a Rate Setting Statement
- seven financial ratios required under section 50(1) of the Local Government (Financial Management) Regulations 1996 (FM Regulations)
- other note disclosures such as trading undertakings and major land transactions.

We have previously recognised that the quantity of detail reported in some aspects is onerous and exceeds that reported by most Western Australian (WA) State government entities and by local governments in other jurisdictions. From page 38 we have summarised DLGSC's progress with some reforms in this regard including the recent changes to the Local Government Regulations Amendment (Financial Management and Audit) Regulations 2022, gazetted on 17 June 2022.

Review of financial reports submitted for audit

Timeliness

Under section 6.4(3) of the *Local Government Act 1995* (LG Act), entities must submit their annual financial reports to the OAG for audit by the statutory deadline of 30 September. Of the 148 entities:

- 120 met the 30 September deadline
- 13 did not
- 17 received approval from the Minister to extend their submission deadline, of these:
 - 8 met the extended deadline
 - 7 did not
 - 2 did not require the extension as they met the 30 September deadline and are included in the 120 figure above.

Further details of entities' timeliness are provided in Appendix 1. Failure to provide good quality financial statements in a timely manner causes delays in the start and therefore the finalisation of audits.

We completed 86 of 148 audits (58%) by 31 December 2021 (compared to 65 of 132 audits (49%) by the same time last year) as required by section 7.9 of the LG Act. While this is an improvement from the previous year, we again encountered issues with the quality and timeliness of information provided by entities. Some entities experienced problems with insufficient evidence to support the financial report and numerous errors requiring correction. We also noted resourcing constraints impacting the sector, most notably in regional entities, which undoubtedly added to the challenge. Finally, we acknowledge the impact of delayed audit completions in numerous State sector entities on our ability to commence some local government entity audits.

Quality

We rate the quality of entities' financial statements that they submit for audit. Roughly half had statements that were of a reasonable standard and required minimal revisions or adjustments.

However, the remaining entities:

- had poor record keeping practices which delayed providing the necessary information for audit
- had numerous errors in their financial statements and disclosure requirements were not met
- experienced finance staff turnover and attrition during crucial times in the financial year, or key personnel were not available to respond to the auditors at key times as they had taken leave.

We identified numerous errors that were corrected by the entities during the audit process. These errors included:

- incorrect valuation method used
- incorrect revenue recognition of funds received in advance
- bank reconciliations for the municipal account not reconciled, resulting in back dated payments not being identified in a timely manner
- incorrect recognition of borrowings and cash and cash equivalents
- land assets not held at their fair value with revaluation recognised through revaluation reserve
- not correctly accounting for their share of investment in associate
- overstatement of employee benefits and misclassification between the current and non-current portion of long service leave provisions.

Also disappointing was the number of entities submitting many versions of their financial statements to us during the audit process. This results in significant additional work for both the entity and the auditor, and delays the finalisation of the audit. For example, one entity submitted 21 versions of its financial statements.

To ensure timely and accurate financial reports it is important that management in each reporting entity keeps proper accounts and records. Management should undertake appropriate oversight reviews of systems and processes throughout the financial year and after year end to improve the quality of their financial reporting.

To assist public sector entities to assess their financial management and reporting practices, our Office tabled the *Western Australian Public Sector Financial Statements – Better Practice Guide*. This practical guide and toolkit set out better practice principles which, when applied, support a strong governance framework and an efficient and effective financial statement preparation process. While the guide is not prescriptive or obligatory, it should assist entities to implement better practices, processes and procedures, and achieve more efficient and timely financial reporting for their entity.

Each year when we table our annual audit results report of State government entities, we assess them on their financial reporting and financial controls. We then recognise those State entities that achieve good practice by assessing the number and significance of control

weaknesses, the quality of their financial statements, audit readiness, management resolution of accounting standards and the availability of key staff during the audit process.

In 2021-22, we will examine the local government sector and recognise the top best practice entities in our annual audit results report. On page 10 we have outlined our assessment criteria. We hope that reporting top achieving entities from across the sector will increase the effectiveness and efficiency of the financial statement preparation process and contribute to improving the quality of financial reports submitted for audit.

Recommendation

1. We encourage entities to make use of our *WA Public Sector Financial Statements – Better Practice Guide* to improve their financial management and reporting practices, processes and procedures.

Summary of audit opinions

For the financial year ending 30 June 2021 we issued clear auditor's reports for 130 entities by 30 June 2022. Two audit opinions were modified (qualified), while we included emphasis of matter paragraphs in the audit reports of 24 entities.

The auditor's report includes:

- the audit opinion on the annual financial report
- any significant non-compliance in relation to the financial report or other financial management practices
- any material matters that indicate significant adverse trends in the financial position of the entity
- other matters the auditors deem necessary to highlight.

Under the LG Act, an entity's chief executive officer (CEO) is required to publish its annual report, including the audited financial report and the auditor's report, on the entity's website within 14 days of the annual report being accepted by the entity's council. Appendix 1 outlines the date we issued each entity's 2020-21 auditor's report.

We also finalised the 2019-20 auditor's report for two entities.

Two disclaimers of opinion for 2019-20

On 16 June 2021, we tabled the results of 117 entities' 2019-20 financial audits in Parliament. On 24 November 2021, we reported a further 13 entities' results in our State government entities audit report. At that time, results remained outstanding for the Shires of Wiluna and Yalgoo. We were unable to express an opinion on their financial audit reports and have now issued them a disclaimer of opinion.

For both entities, we were unable to obtain sufficient appropriate audit evidence on the books and records of the Shires. This was due to numerous significant deficiencies in the Shires' internal controls and in some cases, records not being adequately maintained. See Appendix 2 for the full details of the disclaimers.

The absence of sufficient appropriate evidence is a significant impediment for the auditor and a serious matter for both the auditor and those who rely on the auditor's opinion. If an auditor is unable to obtain the required evidence, they have few options. One option is to issue a disclaimer of opinion.

Such an opinion is only issued after we have exhausted our efforts to achieve the desired audit objectives. It is the first time this Office has issued such an opinion for a local government entity since becoming responsible for auditing the sector in 2017. It is also the first issued by our Office on a financial report for any WA government entity in 25 years.

A disclaimer of opinion on financial statements is a serious matter as we were unable to provide assurance over financial accountability. This can lead to a lack of confidence in the appropriate use of public monies.

Given the nature and timing of these disclaimers of opinion it is, regrettably, our expectation that issues requiring these disclaimed audit opinions may continue into 2021 and 2022 in some manner. However, we are aware that both entities have been working to address these concerns since the matters were first raised.

Response from Shire of Yalgoo

The Shire acknowledges the effort of the OAG in undertaking the 2019-2020 audit. We also confirm that we recognise the seriousness of the issues raised by the audit and give our assurance that a plan of action has already been implemented. We continue to do work under that plan. The Shire would also like to identify a number of factors which influenced the audit result, including:

- resourcing constraints
- changes of CEO
- communication between Shire and audit team
- timing of release of audit report.

We are conscious that the existence of these factors does not amount to an excuse for the deficiencies identified. On the other hand, we hope their existence will go some way to helping explain how those factors, rather than a culture of disregard for the need to ensure proper controls and compliance, contributed to the audit result.

17 June 2022

Two qualified audit opinions for 2020-21

We issue a qualified opinion in our auditor's report on an annual financial report if we consider it is necessary to alert readers to material inaccuracies or limitations in the financial report that could mislead readers.

In 2020-21, two entities received a qualified audit opinion. This is an improvement from four qualifications issued in 2019-20 and six in 2018-19.

The Shires of Goomalling and Sandstone received qualified opinions because their infrastructure assets had not been valued with sufficient regularity and therefore, we were unable to determine if they were fairly stated. For the full details of the qualified opinions see Appendix 3.

Audits in progress

The 16 audits still being finalised may result in modified opinions. Generally, audits in progress relate to:

- entities having more significant or complex issues to be resolved from a financial reporting and auditing perspective
- entities not having the in-house expertise needed to manage their financial reporting.

While some entities collaborate and seek help to overcome these issues, this is often informal and ad-hoc.

Twenty-four entities received emphasis of matter paragraphs

Under Australian Auditing Standards, if a matter is appropriately presented or disclosed in the financial report, but in our judgement is of such importance that it should be drawn to the

attention of readers, we may include an emphasis of matter (EoM) paragraph in our auditor's report.

In 2020-21, 25 EoM paragraphs have been included to bring to the reader's attention to:

- restatements of comparative figures or balances (11 entities)
- restatements and guarantee payments (four entities)
- changes to the basis of accounting used by the entity (six entities)
- the recording of a joint venture (two entities)
- a contingent liability (one entity)
- an event occurring after the end of the reporting period (one entity).

A full description of these matters is at Appendix 4.

In previous years, we included an EoM in all entities' auditor's reports to draw attention to their previous recognition of some categories of land, including land under roads, at zero cost.

Seventy-five entities had 193 material matters of non-compliance with legislation

We reported 193 matters of non-compliance to 75 entities. Under Regulation 10(3)(b) of the Local Government (Audit) Regulations 1996 (LG Audit Regulations), we are required to report any matters indicating that an entity is non-compliant with:

- part 6 of the LG Act
- FM Regulations
- applicable financial controls in any other written law.

The matters may relate to the financial report or to other financial management matters.

The most commonly reported matters related to:

- financial ratios not being reported (28 entities)
- a lack of evidence that enough quotations were obtained to test the market or documentation to explain why other quotes were not sought (22 entities)
- no evidence of independent review and approval of journal postings to the financial ledger (13 entities)
- a financial management review was not completed every three years as required (13 entities)
- changes made to the supplier master files were not independently reviewed and approved (12 entities)
- bank reconciliation processes were incomplete (12 entities).

Other matters included procurement without purchase orders, incomplete monthly reconciliations of fixed assets, payroll and employment non-compliance, and purchase orders raised, approved and paid by the same person. For the convenience of Parliament and the public, we have summarised the noteworthy matters in more detail at Appendix 5.

In determining which matters to examine through audit procedures (on a risk-based sample and rotational basis) and report, we apply the principles of materiality, as required by Auditing Standard ASA 320 *Materiality in Planning and Performing an Audit*. Factors that we consider include the extent and frequency of the non-compliance, and its effect or potential effect.

We also consider Regulation 5(1) of the FM Regulations to be particularly important because failure to effectively apply those requirements can result in significant financial loss, inefficiency, financial misreporting or fraud.

If we find matters of non-compliance at an entity, we will report this in the auditor's report which becomes part of their annual report published on their website. There was no discernible trend regarding the type or size of entity to which these findings relate.

Adverse trends in the financial position of 109 entities

We conducted a high-level assessment of whether the seven financial ratios reported in each entity's financial report achieved the standards set by the DLGSC. This year, we reported that 156 ratios at 109 entities indicated adverse trends of which the asset sustainability and the operating surplus ratios were the most commonly reported as adverse. Last year, for the 2019-20 audits, the comparative figures were 139 ratios with adverse trends at 89 entities. Entities report their ratios for the current year and the preceding three years. Our trend analysis is therefore limited to these four years.

We are required by Regulation 10(3)(a) of the LG Audit Regulations to report 'any material matters that in the opinion of the auditor indicate significant adverse trends in the financial position or the financial management practices of the local government'. When determining if a trend was significant and adverse, in some instances we allowed for a ratio to be slightly lower than the DLGSC standard. We allowed this in recognition that failing to meet some standards is more significant and representative of an entity's financial position than failing to meet others.

Our financial audit assessments of the ratios are conducted objectively on the audited figures from the financial report on a comparable and consistent basis. Our assessments do not consider other aspects of the entity's finances or the inter-relationships between the ratios. These considerations are outside the scope of the legislative audit requirement of Regulation 10(3)(a) and more relevant to a performance audit into adverse trends.

We issued 275 audit certifications

In addition to the auditor's reports on annual financial statements, we also conduct audit work to certify other financial information produced by entities. These audit certifications enable entities to meet the conditions of State or Commonwealth funding or specific grant requirements or legislation (acquittals). Our audit certification of these statements may be required to enable entities to receive ongoing funding under existing agreements or to apply for new funding.

For the 2020-21 audit cycle we are responsible for conducting 139 certifications for the Local Roads and Community Infrastructure Program (LRCI Program). The \$3 billion Commonwealth-funded program supports entities to deliver priority local road and community infrastructure projects across Australia.

Under the LRCI Program, entities who are eligible for funding must provide the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts with an audited 2020-21 annual report by 31 October 2021. This must be audited by an appropriate auditor.

As defined by the *National Land Transport Act 2014*, our Office is the appropriate auditor given entities' accounts are required by law to be audited by the Auditor General of a State.

Appendix 6 lists the 275 certifications we have issued for 2020-21 and the date of issue including:

- 11 claims by administrative authorities for pensioner deferrals under the *Rates and Charges (Rebates and Deferrals) Act 1992*
- 136 statements acquitting Roads to Recovery funding under the *National Land Transport Act 2014*
- 125 statements acquitting the LRCI Program funding (14 certifications outstanding)
- three other certifications for projects by entities.

Control weaknesses

Management controls

We report to entity CEOs on all control weaknesses relating to expenditure, revenue, financial management, asset management and human resources. Control weaknesses that represent matters of material non-compliance form part of the overall auditor’s report that we provide under section 7.12AD of the LG Act to the mayor, president or chairperson, the CEO and the Minister for Local Government.

Our management letters provide a rating for each matter reported. We rate matters according to their potential impact and base our ratings on the audit team’s assessment of risks and concerns about the probability and/or consequence of adverse outcomes if action is not taken. We consider the:

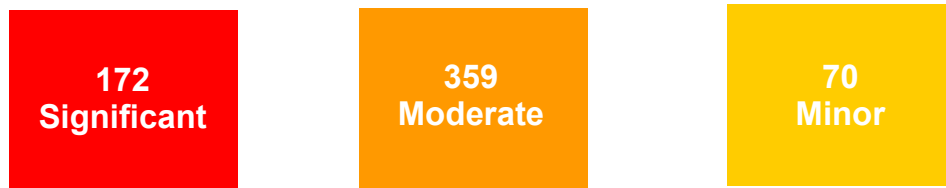
- quantitative impact – for example, financial loss from error or fraud
- qualitative impact – for example, inefficiency, non-compliance, poor service to the public or loss of public confidence.

Risk category	Audit impact
Significant	Finding is potentially a significant risk if not addressed by the entity promptly. A significant rating could indicate the need for a modified audit opinion in the current year or in a subsequent reporting period if not addressed. However, even if the issue is not likely to impact the audit opinion, it should be addressed promptly.
Moderate	Finding is of sufficient concern to warrant action being taken by the entity as soon as practicable.
Minor	Finding is not of primary concern, but still warrants action being taken.

Source: OAG

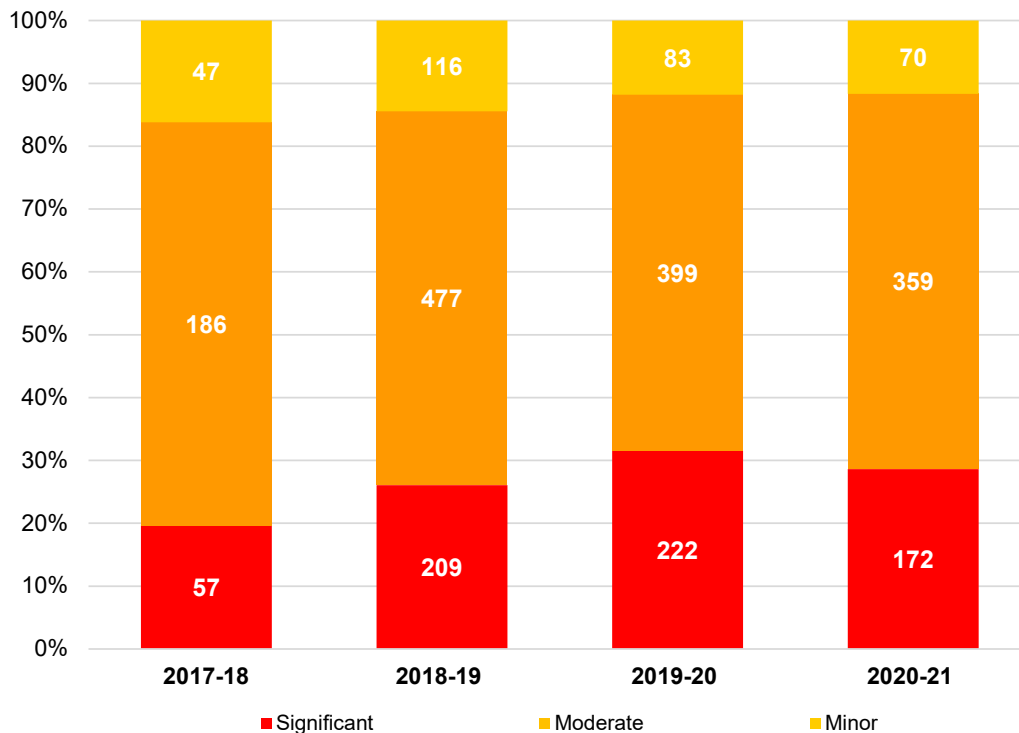
Table 2: Risk categories for matters reported to management

During 2020-21, we alerted 126 entities to control weaknesses that needed their attention. In total we reported 601 control weaknesses across the three risk categories as shown in Figure 1. This is a decrease compared to the figures from 2019-20 where we reported 704 control weakness of which 222 were significant, 399 moderate and 83 were minor findings.



Source: OAG

Figure 1: Number of financial and management control findings by risk category for 2020-21



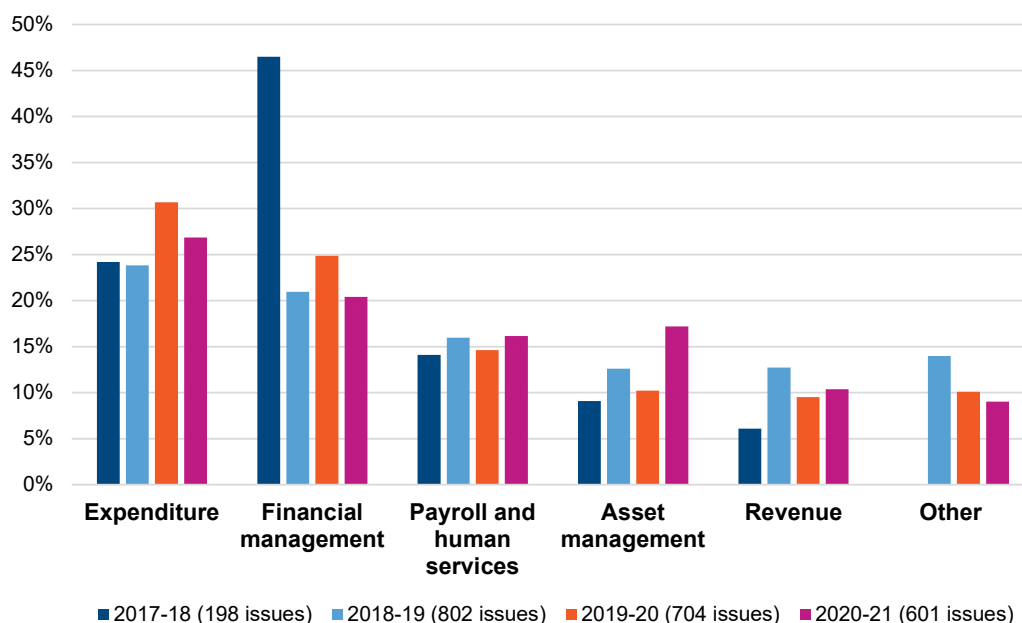
Source: OAG

Figure 2: Proportion of control weaknesses reported to management in each risk category and comparative ratings of the control weaknesses

Figure 2 shows the number of weaknesses in each risk category for the differing number of entities we audited during our first four years of local government auditing and the comparative proportion of weaknesses in each risk category. The chart shows that the number of control weaknesses across all ratings has decreased for 2020-21, noting that each year’s figures represent findings across an increasing population of audited entities during the transition period.

However, we found that 95 control weakness (15.8%) at 39 entities were unresolved from the prior year. This proportion compares with 2019-20 where 15% of issues were unresolved from the prior year. It is important that these issues are addressed promptly and requires entities to improve policies, practices and procedures to maintain or enhance the integrity of financial reporting.

The 601 control weakness identified in 2020-21 are presented in their different financial management control categories in Figure 3. This figure also shows that expenditure and financial management controls continue to represent the highest proportion of weaknesses across the financial control environment. However, it was pleasing to see that the control weaknesses relating to expenditure, financial management, and payroll and human resources have decreased for 2020-21. This is a positive trend. An increase in audit findings related to asset management suggests greater focus may also be required by entities on the controls around this aspect of financial management.



Source: OAG

Note: In 2017-19, no control weaknesses were reported in the Other category.

Figure 3: Financial and management control weaknesses reported to entities

Following are examples of control weaknesses identified in the major categories of audit findings.

Expenditure

We reported that good procurement procedures, such as obtaining quotes and completing purchase orders to start the ordering process and accountability trail, were not routinely practiced. In summary:

- We found purchase order control weaknesses at 33 entities. Purchase orders were often raised after the goods had been supplied or after the supplier’s invoice had been received. The lack of adequate controls over purchase ordering increases the risk of inappropriate purchases or the entity being committed to pay for purchases made by officers who do not have authority or who have exceeded their delegated purchase limits.
- At 22 entities we continued to find instances where quotes were not obtained as required by the entities’ policy guidelines. There were also instances where evidence of quotes was not kept. This increases the risk of favouring specific suppliers and/or not obtaining value for money.
- At 15 entities we reported that changes were made to the supplier master file without appropriate evidence of authorisation or there was no independent review to confirm checking for related party interests, authorisation, completeness and accuracy. These review procedures are essential as technology has increased the risk of fraud.
- We identified credit card control weaknesses at 14 entities. These included instances such as:

- transactions not listed separately in the payments submitted to council each month
- certain staff allocated a credit card who had not signed a credit card holder agreement
- no evidence of independent review for staff credit card monthly expenditure
- receipts not available for certain credit card transactions.
- In some entities there was not adequate separation of tasks between ordering and receiving goods. Without this segregation, the entity needs other controls to ensure that all payments for goods are reviewed and authorised by an independent officer.

Financial management

The accounting procedures and practices of the financial management team should include appropriate controls for preparing the entity's financial report and mandatory annual reporting requirements.

- At 27 entities we found that bank reconciliations were either not routinely prepared on a monthly basis or were not reviewed by a second officer. The bank reconciliation is a key control. If not performed regularly and independently reviewed, there is a risk of erroneous or unusual (including fraudulent) reconciling items not being detected and investigated in a timely manner.
- At 17 entities we found instances where journal entries were made without supporting documentation or were not reviewed by an independent officer. These can represent significant adjustments to previously approved accounting transactions. Unauthorised journals could result in errors in financial reports or fraud. They should therefore be clearly explained and subject to independent review.
- At 15 entities we found a lack of review of policies and procedures.
- At 11 entities we found that access to the financial management, payroll and human resources systems was not restricted to appropriate staff. In some instances, we considered more staff than necessary had passwords to access key systems. Access privileges need to be monitored on a regular basis by a senior staff member.

Payroll and human resources

Payroll and human resource management are essential elements of any employer's business. During our interim and final audits of entities we reported:

- Across 20 entities we found some employees were not taking their annual and long service leave entitlements and therefore accumulating excessive leave balances. Entities should have a leave management plan to ensure suitable staff can undertake the roles of key staff while they are on leave and to continue to deliver the entity's required services. Infrequent taking of leave and associated rotation of staff roles increase the likelihood of fraud remaining undetected.
- At 12 entities we found commencement and termination processes were not completed promptly to ensure timely and accurate processing and payment of staff. Evidence needs to be retained of all employment contracts, which should be signed by both parties on execution.
- At 12 entities we found monthly payroll reconciliations were not prepared in a timely manner and independently reviewed, increasing the risk of errors and/or potential fraud remaining undetected and misstated financial statements.

- At 11 entities we found instances where changes made to employee master files were either not supported by appropriate authorisation from the employee or not independently reviewed for accuracy and completeness. This is important to reduce the risk of payroll errors or fraud.

Asset management

We identified several weaknesses in the controls over assets. These included:

- a lack of evidence of review of fixed asset reconciliations at 14 entities
- asset management plans not completed or sufficiently updated at eight entities. This may impact the strategic planning process and is likely to result in misstatement of the asset renewal funding ratio in the financial report
- no asset stocktake policy or procedures in place at seven entities. The absence of a periodic asset stocktake means that discrepancies between the accounting and physical records will not be detected and corrected on a timely basis. This could result in failure to detect theft or loss and/or a misstatement of asset balances in the annual financial report
- a lack of comprehensive asset management procedures to manage non-current assets at six entities. Good policies and procedures provide essential guidance for staff to manage an entity's assets in accordance with management's expectations. Lack of formal and comprehensive policies and procedures that are readily available to staff increases the risk of mismanagement and recording of assets.

Other asset issues we found included:

- the entity not performing an assessment to determine the correct classification of vested improvements on vested land required to be separately classified as right-of-use assets
- asset revaluations not completed in a timely manner
- no documented inventory control policy and procedure for employees to follow to ensure that inventory is physically safeguarded and all movements are recorded accurately and completely in the accounting records
- incorrect application of the useful life of assets in depreciation calculations which could result in an over/understatement of the depreciation and hence of the carrying value of the assets in the financial statements.

Revenue

Good controls over revenue help to ensure that all monies due to the entity are accurately charged, collected and reported in the financial statements. During our interim and final audits, we reported:

- charges being raised prior to a completed review of the rates billing verification register
- fees were not correctly recorded in the financial system and customers were charged the incorrect fee
- no register of infringements issued by the entity
- interim rate notices had not been issued throughout the year by the entity
- rateable values reconciliation not completed

- a lack of a formal process to assess the revenue recognition criteria for new grant funding received
- revenue not recognised in accordance with AASB 15 or AASB 1058. As application of these standards may result in delayed income recognition, the entity's revenue may be overstated for the 2020-21 financial year.

Recommendation

2. Local government entities should ensure they maintain the integrity of their financial control environment by:
 - a. periodically reviewing and updating all financial, asset, human resources, governance, information systems and other management policies and procedures and communicating these to staff
 - b. conducting ongoing reviews and improvement of internal control systems in response to regular risk assessments
 - c. regularly monitoring compliance with relevant legislation
 - d. promptly addressing control weaknesses brought to their attention by our audits, and other audit and review mechanisms
 - e. maintain currency with new and revised accounting standards for their impact on financial operations in order to prepare a compliant financial report at year end.

Information system controls

In 2020-21, we reported 358 information system control weaknesses to 45 entities, with 10% (37) of these rated as significant and 71% (254) as moderate. Last year we reported 328 control weaknesses to 50 entities. As these weaknesses could significantly compromise the confidentiality, integrity and availability of information systems, entities should act promptly to resolve them.

Entities rely on information systems to prepare their financial statements and to deliver a wide range of services to their communities. It is important that entities implement appropriate controls to maintain reliable, secure and resilient information systems.

Audits of general computer controls help entities measure and improve the effectiveness and reliability of services and financial reporting. These audits are performed as an integral part of, and inform, our financial audit program

Our capability assessments at 12 of the 45 entities show that none met our expectations across all six control categories and 68% of the audit results were below our minimum benchmark. Information and cyber security remain significant risks again this year and need urgent attention. Compared to 2019-20, there have been some improvements in change control but very little progress in management of information technology (IT) risks, physical security and IT operations. Entities need to improve in all six control categories.

Of the weaknesses identified in 2020-21:

- 47% related to information security issues. These included system and network vulnerabilities, and unauthorised and inappropriate access
- 28% related to IT operations issues. In particular, there were issues in inadequate monitoring and logging of user activity, poor handling of information and lack of review of user access privileges
- 13% related to business continuity. For example, disaster recovery and business continuity plans were lacking or out-of-date
- 12% related to inappropriate IT risk management, poor environmental controls for the server room and a lack of change management controls.

The information provided above is included in our *Information Systems Audit Report 2022 – Local Government Entities*, tabled on 28 June 2022. Further details of the information systems audit work and case studies are included in that report.

Issues impacting entity reporting

Rehabilitation of landfill sites

Issue

Many entities have landfill sites which they manage. Depending on the size and scale of these sites, there are different requirements to rehabilitate them. Where entities have an obligation to remediate the landfill site, they should include the rehabilitation costs as a provision in their financial report. The absence of a rehabilitation plan and cost estimate does not remove the need to record a provision.

From the time it is evident that recognising a liability is required, to actually reporting one, a process of planning is needed, and this can take a while. In the meantime, readers should be alerted to the fact that a liability will be created by the entity showing a contingent liability in their financial reports. This is shown in the example below.

What we found

We've found that some entities are not including these provisions for rehabilitation and others that are, are accounting for them differently. There is a possible role for the DLGSC to provide guidance in this area to ensure entities are correctly accounting for rehabilitation provisions.

Example: City of Kalgoorlie-Boulder

The City has operated the Yarri Road Refuse Facility in east Kalgoorlie since 1993. The site operates under a Class II landfill license under Part V of the *Environmental Protection Act 1986* which requires licensing.

The City has never previously recognised a provision for landfill rehabilitation. It has disclosed a contingent liability for at least the three previous annual financial reports to fully restore the site at the end of its useful life. The City was also undertaking work to establish the scope and estimate the cost of the restoration, which was unable to be reliably estimated in previous financial reports.

During the 2020-21 period, the City engaged a third-party expert to prepare a closure and post-closure management plan and provide a comprehensive estimation of the future costs for the site closure, capping, restoration and monitoring activities. The plan was finalised in March 2021 and a landfill rehabilitation provision of \$28.8 million was recognised.



Source: OAG

Figure 4: Broome landfill

Recommendation

3. The Department of Local Government, Sport and Cultural Industries should provide guidance to assist entities with understanding the requirements of and interpreting the AASB accounting requirements to ensure greater accounting consistency across the sector, including recognising provisions for the rehabilitation of landfills and other contaminated sites.

Valuation of assets

Issue

As reported in previous years, we have concerns about inconsistencies in the valuation of property and infrastructure in the local government sector, including the variety of valuation methods used, especially for land assets with restricted use.

Valuation concerns arise from entities engaging different valuers who use different methods or interpret some principles of the Australian Accounting Standards differently. Consequently, entities can see significant valuation swings when they change their valuer, depending on which assumptions the valuer uses. Most entities revalued their restricted land assets in 2017 or 2018 in accordance with the FM Regulations. Their next three to five yearly valuations are due at the latest by 2022 or 2023.

As mentioned last year, the AASB and the International Public Sector Accounting Standards Board have projects underway relating to fair value of public assets. Our Office will work with other audit offices to prepare a submission to these fair value projects and with the DLGSC on the audit impacts of any changes.

Even though a formal valuation is not required to be undertaken every year, the requirement for such assets to be at fair value remains. Thus, each entity needs to do enough, at a minimum, to be able to conclude that the carrying value at the reporting period approximates its fair value. This would entail, amongst other things, condition assessments, assessing recent pricing movements in materials and labour, and other relevant material factors.

What we found

A few examples of entities experiencing some valuation issues were:

- City of Albany – the City has no formal process for assessing the valuation of infrastructure assets, land and buildings in financial years between the formal valuation assessments required by the FM Regulations. Without this, an asset may not be correctly recorded at fair value in accordance with AASB 116 and AASB 13. The City was notified of the finding during an interim audit and completed an assessment as part of its end of financial year procedures.
- City of Subiaco – the City's investment property increased by \$12.3 million (11%) compared to the prior year due to a revaluation to fair value at 30 June 2021 based on an independent valuation of \$125 million, which resulted in a net gain of \$29 million. The City also reported an increase to Revaluation Surplus of \$35.8 million (28%) compared to the prior year.
- Town of Cottesloe – during 2020-21, an independent valuation of land and buildings resulted in a decrease in fair value of \$20.5 million compared to the prior year. This related to an interest the Town has in the Wearne Hostel (refer below).

- Four entities hold an equal share in the Wearne Hostel site at 1 Gibney Street, Cottesloe but value it differently. We found one valuation almost double that of the other. The Towns of Claremont and Mosman Park have valued their respective interests separately without restrictions, while the Shire of Peppermint Grove and Town of Cottesloe have valued with restrictions (i.e. title showing zoning for use only as an aged care facility), resulting in a much lower valuation. We acknowledged the inconsistency in financial reporting for the same asset but accepted both valuations (restricted and unrestricted) as they are currently permissible under the relevant accounting standard and DLGSC financial reporting framework.

Developer contributions – Accounting for cash in lieu of public open space

Issue

When subdividing residential land in WA, a minimum of 10% of the gross subdivisible area must be given up free of cost by the landowner for public open space. The landowner can make a cash payment to an entity in lieu of all or part of the public open space contribution, which must be agreed by the entity and approved by the Western Australian Planning Commission.

Amendments to section 154 of the *Planning and Development Act 2005* (PD Act) changed the accounting treatment for cash in lieu of public open space contributions received on or after 12 September 2020. Entities receiving any cash in lieu funds should now place them in a reserve account for each subdivision within the municipal account, in accordance with section 6.11 of the LG Act.

The account should clearly set out the purpose for which the money is held, the landholding from which it was obtained and the date on which it was paid to the entity. Section 154(3) of the PD Act also requires interest earned on any invested funds to be applied to the respective reserve account.

The DLGSC provided guidance to entities on the accounting treatment for cash in lieu received on or after 12 September 2020, from 10 April 2006 until 11 September 2020, and prior to 10 April 2006. One entity sought its own legal advice.



Source: bumphotographer/shutterstock.com

Figure 5: Park and playground in a suburban area of Perth

What we found

While some entities were not prepared, the majority of affected entities accounted for the funds appropriately and complied with revised legislative requirements.

Some entities had differing treatments, for example:

- We noted that money paid to the City of Albany in lieu of open space, post 12 September 2020 and amounting to \$30,000, was not placed in a reserve account in accordance with section 6.11 of the LG Act. On being notified of the finding during the interim audit, the City rectified this as part of their annual procedures, had a newly created public open space reserve account endorsed by Council and correctly reported the received funds in the annual financial statements for the year ended 30 June 2021.
- The City of Cockburn, on obtaining legal advice, chose to adopt a different accounting treatment than recommended by the DLGSC. It accounted for all cash in lieu of public open space in the municipal fund, rather than some in trust and some in the municipal fund.
- We found the accounting for cash in lieu by the City of Greater Geraldton is classified in accordance with the PD Act, with an exception that funds amounting to \$378,000 should have been classified as trust rather than in reserves, as it was received between 10 April 2006 and 11 September 2020. We accepted this as reasonable and agreed with management on the classification of the funds.

Implementation of Service Concession Grantors Standard AASB 1059

Issue

Entities were required to apply a new standard, AASB 1059 *Service Concession Arrangements: Grantors*, for years beginning on or after 1 January 2020 (the 2020-21 reporting year). This standard is applicable to entities (grantors) that enter service concession arrangements with generally private sector operators.

It requires grantors to recognise a service concession asset and, where applicable, a service concession liability on the balance sheet. Alternatively, a service concession asset may result from the reclassification of an existing item of property, plant and equipment.

An arrangement within the scope of this standard typically involves an operator constructing the assets used to provide a public service or upgrading the assets (for example, by increasing their capacity) and operating and maintaining the assets for a specified period. Such arrangements are often referred to as public-private partnerships.

An example of a major service concession arrangement for WA local government is the Resource Recovery and Facility Agreement involving the Mindarie Regional Council, a regional entity, and its constituent member entities - the Cities of Perth, Stirling, Joondalup, Wanneroo and Vincent, and the Towns of Victoria Park and Cambridge.

Under this agreement the operator constructed and has the responsibility to manage the facility for the purpose of waste processing activities on behalf of the Mindarie Regional Council. The agreement was entered into for a 20-year term ending June 2030. On termination of the agreement, the Mindarie Regional Council would assume all rights and responsibilities in relation to the assets and liabilities of the Service Concession Arrangement.

What we found

For most entities there was no material impact to the financial statements in 2020-21.

Other changes to accounting standards**What we found**

As we reported in November 2021⁵, the reporting of revenue and income by not-for-profit entities under AASB 15 and AASB 1058, which were applied from 1 July 2019, has brought challenges in interpretation and implementation. It is expected that the AASB will propose further guidance and examples in 2022 that have the potential to change current accounting practice.

⁵ Office of the Auditor General, [Audit Results Report – Annual 2020-21 Financial Audits of State Government Entities](#), OAG, Perth, 2021, p 43.

Impact of emergencies

COVID-19

We have continued to note the impact of COVID-19 responses on entities' financial reporting processes and control environments. Part of our 2020-21 audits considered the impact faced by entities, given State and international border restrictions were in place during the financial year and in February, April and May 2021 the WA Government announced lockdowns and other restrictions in response to managing COVID-19 community transmission. Some of the impacts are summarised below.

Disruption of services and reduced revenue

Entities were faced with venue closures and restrictions for public and private gatherings resulting in event cancellations and reduced capacity. A few examples identified during our audits are listed below where entities experienced an impact to the community and disruption of services:

- City of Greater Geraldton – reported that Recreation and Culture income was down from \$4.2 million in the prior year to \$1.6 million in 2020-21 (62%). This decrease is mainly due to the recreation and culture sector being heavily impacted by COVID-19 restrictions including the stand down of theatre and events staff. The Queens Park Theatre was completely closed for the nine months to March 2021 with partial reopening from April to June 2021. All events and cultural projects at the City were either scaled back or not held due to State mandated restrictions.
- City of Melville – the City reported a 10% decrease in rates revenue for 2020-21 compared to the prior year. Rates concessions (approved by the Council in April 2020) applied in the 2020-21 budget under the COVID-19 Stimulus package amounted to approximately \$10 million. The City also reported a 56% decrease in interest earnings from \$4.4 million in the prior year to \$1.9 million in 2020-21. As part of section 6.45 of the LG Act modified under the Local Government (COVID-19 Response) Order 2020 to cushion ratepayers from the adverse economic effects of COVID-19, the City reduced interest rates to 2% on:
 - unpaid rates subject to an instalment program (previously 4%)
 - all unpaid rates and services (previously 8%)
 - unpaid underground power and streetscape charges (previously 4%).

This also led to a decrease in rates receivable balances at year end.

- The City of Rockingham – committed to a rate freeze for 2020-21 due to the COVID-19 pandemic. In addition, the City provided a concession totalling \$846,773. The concession was to ensure that residential properties were not charged more rates than they would have paid in 2019-20 due to the statutory Gross Rental Value revaluation the City was required to apply. The City also reduced interest rate charges on unpaid rates and other service charges and therefore reported a \$2.2 million (67%) decrease in interest earnings compared to the prior year. Payments by residents however have continued to be repaid in 2021 with a resulting effect of lower receivable balances compared to the prior year.
- City of Stirling – as part of the City's COVID-19 response in 2020-21, the Council committed to a one-off concession to ensure no ratepayer was asked to pay more than the previous year. The City also introduced rates smoothing in addition to its one, two

and four instalment options. In accordance with the Local Government (COVID-19 Response) Order 2020, the City did not charge

- interest where an owner selected to pay rates and service charges through an instalment option
- overdue interest to ratepayers with overdue rates and service charges.
- Shire of Harvey – reported a reduction in interest earnings from \$1.3 million in the prior year to \$395,000 in 2020-21 (69%) mostly due to the decrease in interest rates paired with a decrease in interest earnings from rates revenue due to rate relief from COVID-19.
- Shire of Ngaanyatjaraku – statutory environmental health functions such as food inspections were delayed as they were not deemed to be an essential service by the WA Police Force and G2G passes were not approved for the visiting environmental health officer. Indoor sport and recreation activities were cancelled and program changes were made to enable limited activities to provide food and essential services in compliance with COVID-19 directions.

Entities' expenses for directly managing the impact of COVID-19

Differentiating between COVID-19 specific expenditure and normal expenditure was difficult as entities generally did not separately account for these expenses. In general, entities did not report incurring any significant expenditure as potential extra expenses were offset by savings elsewhere. Some interesting examples are noted below:

- Shire of Broome – the Shire's current three year COVID-19 recovery plan focuses on significant infrastructure projects. The State and Commonwealth Governments have co-invested in most of these projects. The intent of the projects is to reinvigorate the region and stimulate the local economy (e.g. jobs and tourism) which will assist in COVID-19 recovery.
- Shire of Denmark – the Shire experienced challenges in securing contractors and equipment from interstate and intrastate due to COVID-19 restrictions. Cost of contractors, materials and supplies has risen on average 20% over the past 12 months. Due to significant increases in available State and Commonwealth funding, it is increasingly difficult to secure available contractors to complete works within funding condition timeframes. The impact of COVID-19 has fast-tracked the Shire to implement more services and application processes online for the community to access.
- Shire of Dowerin – while the financial impact of COVID-19 on the Shire was minimal throughout 2020-21, additional resources were allocated including:
 - staff resources to keep up-to-date with relevant information and mandates
 - preparing and implementing the Shire's COVID-19 plan and working-from-home processes
 - increased community communication and engagement
 - additional cleaning.

The Shire had also experienced delays in completion of road construction and building projects due to contractors not being available and an increased cost of materials, freight and contractors.

- Shire of Gnowangerup – the main impact for the Shire includes significantly reduced availability of contractors, particularly building-related trades, and reduced availability of

vehicles. This has impacted the Shire's ability to complete projects within timeframes and budgets. Some capital expenditure items in the current year budget will carry over to the new financial year as a result.

Stimulus or initiatives administered by entities

Below are some examples where entities played a role in distributing funds and providing relief to their communities in 2020-21:

- City of Gosnells – the City reported \$1.4 million in COVID-19 concessions for ratepayers and relief for lessees.
- City of Greater Geraldton – the City offered rent relief to some tenants who were badly affected by the pandemic. The rent relief was in line with the *Commercial Tenancies (COVID-19 Response) Act 2020* and was available to tenants that had experienced a reduction of revenue of at least 30% over the previous year. The relief was in two parts: a portion of the rent was to be waived and another portion was to be deferred.
- City of Kalamunda – a COVID-19 Crisis Relief Fund reserve was established by the City at the beginning of the financial year of \$1 million to provide innovation grants of up to \$5,000 and \$1,000 rate relief to each eligible ratepayer. However, only \$216,000 was paid out during the year to 30 June 2021. The balance of the fund was returned to the City's bank account and the Crisis Relief Fund reserve was closed with the Council's approval. The City also offered a total of \$22,000 in rates exemptions under its COVID-19 financial hardship policy for the year ended 30 June 2021.
- City of Karratha – the City received a one-off contribution of \$1 million from Rio Tinto for COVID-19 recovery which was used to support the City's business and community funding packages. This included Try Local Vouchers, sporting group grants, tourism operator incentives, health fee waivers, business grants and Meet the Street funding. In addition, the City provided a number of other COVID-19 business and community support initiatives such as a freeze on rate and fee increases, deferral of rate collection, financial hardship support and lease fee relief.
- City of Subiaco – in response to the pandemic, the City resolved through its annual budget 2020-21 to provide a one-off contribution of \$2 million against total rates levied. This contribution was funded through a transfer from the Capital Investment Reserve. The \$2 million contribution to rates was applied proportionately to the number of rates levied per property, including properties paying minimum rates.
- Shire of Dalwallinu – the Shire adopted a financial hardship policy during 2019-20 to assist the community members who may have been affected by the COVID-19 pandemic. This policy was amended during 2020-21 to also include other unexpected items that may result in payment difficulties.
- Shire of Dandaragan – the Shire implemented a range of measures to respond to the challenges of COVID-19 including removing or heavily discounting interest charges on rates and debts, deferring community group loans and providing \$5,000 cash grants to community groups to enhance their facilities. A significant increase in infrastructure investment was undertaken targeting civil works that could employ the local workforce, in particular deckhands, who were impacted by disruption to the crayfishing industry. A COVID-19 community building program was established to support those at high risk including seniors, people with a disability or underlying health issue, people from culturally and linguistically diverse backgrounds, and indigenous people. The Shire also developed a COVID-19 webpage providing information and tools for its community such as the COVID-Readiness Household Plan.

Future potential effect of COVID-19

As responses to COVID-19 continue to impact well beyond this reporting period and constrain the functions and responsibilities of entity operations, the risk increases that other critical areas may not receive the focus or priority they deserve. We encourage staff and management to be mindful of gaps where more visible financial and operational controls may cease to operate effectively, including in altered work arrangements such as staff working from home.

Cyclone Seroja

On 11 April 2021, Cyclone Seroja intensified into a category 3 tropical cyclone and crossed the WA coast just south of Kalbarri. Impacts to Kalbarri and the nearby town of Northampton were severe, with many locations recording maximum wind gusts more than 170 km/h. Many buildings and roads sustained significant structural damage or were destroyed. An emergency situation was declared at 3.50 pm on 11 April for 45 local government areas. Services were disrupted, facilities were closed and significant damage occurred to critical infrastructure. Secondary impacts included loss of power and communications for an extended period, and a primary focus for affected communities on repair and recovery.

Examples of the financial implications arising from this emergency event in the region are as follows:

- Shire of Mingenew – at its May 2021 Ordinary Council Meeting, Council voted unanimously to waive a range of building and planning application fees to assist those impacted to rebuild, and waived some planning requirements for temporary buildings at its August 2021 Ordinary Meeting.
- Shire of Northampton – cyclone damage led to a write-down of Property, Plant and Equipment of \$1.1 million and Infrastructure of \$178,000 for the 2020-21 financial year. Additional funding of \$500,000 was received from the Local Government Insurance Scheme for operational repairs, and materials and contracts costs increased by \$1 million from \$2.3 million in the prior year to \$3.3 million in 2020-21 due to additional work required to restore the Shire's townsites.
- Shire of Chapman Valley – damages to the Shire's assets were not extensive. However, the cyclone impacted staff resources due to time taken away from core business to attend to local recovery initiatives. During the financial year the Shire restored some properties and certain work had to be carried forward to financial year 2021-22.
- City of Greater Geraldton arranged additional resources immediately following the cyclone to aid clean-up efforts. The City also spent more than \$500,000 on clearing vegetation and concentrated on rural road maintenance and removing and mulching fallen vegetation.
- Shire of Morawa experienced 202 requests for emergency welfare assistance, with 104 homes damaged and 23 primary producer properties impacted. The council spent \$141,962 in the immediate response to the cyclone with the majority being for the clearing of roads, removing fallen trees and town clean-up.

Opportunities for the DLGSC to improve the efficiency of financial reporting

Our audits have once again highlighted the need for the DLGSC to provide centralised professional support to assist entities to fulfil their financial reporting requirements. We have previously raised the need for the DLGSC to provide professional advice on preparing for changes in accounting standards and legislation. This would be both financially beneficial and time efficient for all entities. This section includes updated information on the steps the DLGSC is taking to enhance financial reporting, reduce complexity and costs, and enable improved governance. It is important to note that while some of these issues may relate to all entities, others may only be applicable to some.

Quality and timeliness

In 2019-20, and in prior reports, we reported that many entities would benefit from centralised support from the DLGSC similar to that provided to State government entities by the Department of Treasury through the Treasurer's Instructions. This would help to improve the overall quality of the sector's financial reports and also reduce the reporting burden on smaller entities. We identified the need for actions such as:

- decluttering entities' financial reports
- implementing tiered reporting for entities that differ in the size or complexity of their operations
- providing a model financial report with current sample notes
- providing technical and accounting standards support to entities through a help desk.

Further, we suggested the DLGSC's support should pursue timely regulation amendments and provide suitable guidance to assist entities to update their accounting practices. This would help ensure that their future reporting is compliant with all current accounting standards and improve the financial report framework.

While our Office produced the *Western Australian Public Sector Financial Statements – Better Practice Guide* to assist entities to implement better practices for more efficient and timely financial reporting, centralised assistance offered by the DLGSC will achieve consistency, improve financial reporting standards and could offer practical accounting assistance.

Response from the DLGSC

DLGSC has made significant progress towards addressing the recommendations via its local government model financial statements project which commenced in September 2021. DLGSC expects to fully address all recommendations by the end of financial year 2022-23. This has been largely driven by DLGSC's commitment to deliver efficiencies and better financial reporting outcomes for the local government sector. As a result, DLGSC has met and is on track to meet several critical milestones, including:

- delivery of the first tranche of decluttered financial reports for 2021-22 by 1 July 2022. The required amendments to the FM Regulations and LG Audit Regulations were gazetted on 17 June 2022
- delivery of a further second tranche of decluttered financial reports for 2022-23 by 28 April 2023
- implementing reduced financial reporting for smaller entities for the financial year 2022-23, onwards
- providing model financial statements templates with guidelines for the financial year 2022-23, onwards
- providing technical and accounting standards support from June 2022 via a dedicated email support line.

Review of financial ratios

We are required by Regulation 10(3)(a) of the LG Audit Regulations to report 'any material matters that in the opinion of the auditor indicate significant adverse trends in the financial position or the financial management practices of the local government'.

It has been our view since becoming the auditor for the sector that the annual financial report audit does not provide the opportunity for a thorough assessment of any adverse trends that may be apparent from the ratios. We have also previously supported the need for the DLGSC to develop more thorough and balanced performance assessment criteria to replace the existing reporting and audit of seven financial ratios and any adverse trends in these ratios.

In 2019-20, we also reported that the Western Australian Local Government Association (WALGA) had recommended changes to the ratios in its Local Government Financial Ratios Report provided to the WALGA State Council Meeting on 5 May 2021. The report included recommendations for prescribed ratios and other financial reporting related matters. Along with ratio changes, the group also recommended the DLGSC prepare a model set of financial statements and annual budget statements in consultation with the local government sector.

Response from the DLGSC

The DLGSC has taken on board the OAG's views and recognised the contributions of key stakeholders in respect of the financial ratios and their intended purpose and outcomes. The DLGSC's approach to financial reporting of ratios has been largely underpinned by the OAG recommendations and the need to bring local government financial reporting in line with better practice frameworks.

While the DLGSC has taken action to remove the reporting of financial ratios from the 2021-22 annual financial report, and the audit reporting of significant adverse trends and attestation of ratios, it is still committed to ensuring reliable information on local government financial and sustainability measures is available.

The DLGSC is undertaking a comprehensive review of the current financial health indicator, taking into consideration WALGA's Financial Ratios Working Group recommendations. The review will assess the appropriateness of the current financial ratios and recommend a set of financial and sustainability measures that are evidence based and fit for purpose. This will then inform the information reported via the MyCouncil website.

The Western Australian Treasury Corporation (WATC) was engaged in late March 2022 to undertake a review of the financial health indicator to identify the most appropriate ratios to underpin it. A stakeholder group consisting of WATC, the DLGSC, WALGA, LG Professionals WA and a local government finance consultant has been established to help inform the review. Targeted stakeholder engagement is to be undertaken in due course for input and feedback on the proposed ratios and methods used to underpin the new financial health indicator.

The scope prepared for WATC requests that a report and new financial health indicator product is provided to the DLGSC by 31 August 2022. The DLGSC will then review the outcomes of the report before implementing the changes for the MyCouncil website in 2023.

Reduced disclosure reporting by entities

The quantity of information that is reported in the annual financial reports of entities is onerous and exceeds that reported by most State government entities. Entities also include several disclosures that are not common practice in other Australian states. This contributes to the time and cost to prepare and audit annual financial reports.

In 2019-20, we reported that opportunities still exist to introduce a tiered reporting structure and reduce the amount of detail in entity financial reports without impacting the usefulness and completeness for users. While the FM Regulations do not provide entities as much opportunity to reduce financial report disclosures as State government entities, we continue to encourage efforts to streamline financial framework obligations, particularly for small and medium sized entities, wherever it does not impair accountability and transparency.

Response from the DLGSC

The DLGSC fully recognises the need for tiered reporting based on complexity and size of entities, while still meeting the needs of the users of financial reports. The DLGSC has developed model financial statement templates based on Salaries and Allowances Tribunal banding.

The model financial statement template for Band 1 and 2 entities significantly reduces the existing level of disclosures required to be audited. Our recommendations to the Parliamentary Select Committee into Local Government have largely guided the DLGSC in the removal of the disclosures.

The Band 3 and 4 entity model financial statement template is also streamlined and removes further disclosures without compromising the accountability and transparency of financial reporting. The DLGSC has been working closely with the OAG to ensure critical information and compliance with Accounting Standards is retained. After sector consultation, it was agreed that the model financial statements for both Band 1 and 2, and Band 3 and 4 should be introduced from the 2022-23 financial year onwards.

Local Government Regulations Amendment (Financial Management and Audit) Regulations 2022

The first component of regulatory amendments to enable the model financial statements, the *Local Government Regulations Amendment (Financial Management and Audit) Regulations 2022*, were gazetted on 17 June 2022.

Key changes which are welcomed by our Office include the removal of the requirement for an annual financial report by an entity to include:

- financial ratios
- an auditor's opinion on financial ratios, significant adverse trends and matters of non-compliance.

The changes made to the FM Regulations will reduce local government reporting requirements and the scope of audit reports and come into effect from 1 July 2022. As some 2021-21 audits are still in train, transitional provisions apply to financial reports in relation to 30 June 2021 whose audits are yet to be finalised.

Recommendation







4. The Department of Local Government, Sport and Cultural Industries should continue to work with local government stakeholders towards the introduction of model financial statements for the 2022-23 financial year.

































Appendix 1: Status and timeliness of 2020-21 audits

We completed 132 of the 148 audits for 2020-21 by 30 June 2022. All entities are listed in alphabetical order below, as well as the type of audit opinion they received, when they received it and the timeliness of providing their financial statement to us for audit.

Timeliness of financial statements does not indicate quality. Roughly half of the entities' financial statements submitted to us for audit were not of a reasonable standard and required revisions or adjustments due to errors or disclosure requirements not being met. In some cases more than a dozen versions of financial statements were submitted to our audit teams, with changes or availability of staff or information also impacting timelines. More information on issues around quality and timeliness is provided on pages 14 and 15.

Key

Type of audit opinion		Financial statement (FS) timeliness	
Clear opinion		Received by the statutory deadline of 30 September 2021	
Clear opinion with emphasis of matter		Extension to the statutory deadline was granted and met	
Qualified or a disclaimer of opinion		Extension or statutory deadline was not met	
















Entity	Type of opinion	Opinion issued	FS timeliness
Bunbury-Harvey Regional Council		14/12/2021	
City of Albany		3/12/2021	
City of Armadale		15/03/2022	
City of Bayswater	Audit in progress		
City of Belmont		17/02/2022	
City of Bunbury		7/12/2021	
City of Busselton		15/11/2021	
City of Canning		30/11/2021	
City of Cockburn		30/11/2021	
City of Fremantle	Audit in progress		
City of Gosnells		10/12/2021	
City of Greater Geraldton		9/12/2021	
City of Joondalup		14/12/2021	
City of Kalamunda		22/11/2021	
City of Kalgoorlie-Boulder		4/05/2022	
City of Karratha		8/03/2022	
City of Kwinana		9/12/2021	

Entity	Type of opinion	Opinion issued	FS timeliness
City of Mandurah		17/12/2021	
City of Melville		9/12/2021	
City of Nedlands		30/11/2021	
City of Perth		23/03/2022	
City of Rockingham		23/11/2021	
City of South Perth		19/11/2021	
City of Stirling		23/12/2021	
City of Subiaco		17/11/2021	
City of Swan		24/11/2021	
City of Vincent		15/12/2021	
City of Wanneroo		17/12/2021	
Eastern Metropolitan Regional Council		17/11/2021	
Mindarie Regional Council		14/01/2022	
Murchison Regional Vermin Council		22/11/2021	
Pilbara Regional Council		28/04/2022	
Rivers Regional Council		30/09/2021	
Shire of Ashburton	Audit in progress		
Shire of Augusta-Margaret River		6/12/2021	
Shire of Beverley		22/02/2022	
Shire of Boddington		7/04/2022	
Shire of Boyup Brook	Audit in progress		
Shire of Bridgetown-Greenbushes		23/11/2021	
Shire of Brookton		30/03/2022	
Shire of Broome		3/12/2021	
Shire of Broomehill-Tambellup	Audit in progress		
Shire of Bruce Rock		16/12/2021	
Shire of Capel		3/03/2022	
Shire of Carnamah		12/04/2022	
Shire of Carnarvon	Audit in progress		
Shire of Chapman Valley		7/12/2021	

Entity	Type of opinion	Opinion issued	FS timeliness
Shire of Chittering		18/02/2022	
Shire of Christmas Island		14/03/2022	
Shire of Cocos (Keeling) Islands		8/04/2022	
Shire of Collie		16/02/2022	
Shire of Coolgardie		17/12/2021	
Shire of Coorow		10/03/2022	
Shire of Corrigin		16/12/2021	
Shire of Cranbrook		9/12/2021	
Shire of Cuballing		22/12/2021	
Shire of Cue		6/05/2022	
Shire of Cunderdin		18/02/2022	
Shire of Dalwallinu		16/12/2021	
Shire of Dandaragan		16/12/2021	
Shire of Dardanup		8/12/2021	
Shire of Denmark		2/12/2021	
Shire of Derby-West Kimberley	Audit in progress		
Shire of Donnybrook-Balingup		23/02/2022	
Shire of Dowerin		17/02/2022	
Shire of Dumbleyung		17/03/2022	
Shire of Dundas		6/04/2022	
Shire of East Pilbara		30/03/2022	
Shire of Esperance		10/11/2021	
Shire of Exmouth		17/11/2021	
Shire of Gingin		29/06/2022	
Shire of Gnowangerup		22/12/2021	
Shire of Goomalling	Qualified	22/12/2021	
Shire of Halls Creek		18/03/2022	
Shire of Harvey		20/12/2021	
Shire of Irwin		28/03/2022	
Shire of Jerramungup		14/12/2021	
Shire of Katanning		21/12/2021	

Entity	Type of opinion	Opinion issued	FS timeliness
Shire of Kellerberrin		8/12/2021	
Shire of Kent		15/03/2022	
Shire of Kojonup		17/06/2022	
Shire of Kondinin		21/12/2021	
Shire of Koorda		25/02/2022	
Shire of Kulin		23/02/2022	
Shire of Lake Grace		18/03/2022	
Shire of Laverton		17/02/2022	
Shire of Leonora		8/12/2021	
Shire of Manjimup		29/11/2021	
Shire of Meekatharra		3/12/2021	
Shire of Menzies		15/12/2021	
Shire of Merredin	Audit in progress		
Shire of Mingenew		10/12/2021	
Shire of Moora	Audit in progress		
Shire of Morawa		21/12/2021	
Shire of Mount Magnet		4/03/2022	
Shire of Mount Marshall		6/12/2021	
Shire of Mukinbudin		17/12/2021	
Shire of Mundaring		10/12/2021	
Shire of Murchison	Audit in progress		
Shire of Murray		15/02/2022	
Shire of Nannup		18/02/2022	
Shire of Narembeen		15/12/2021	
Shire of Narrogin		22/12/2021	
Shire of Ngaanyatjaraku		30/11/2021	
Shire of Northam		7/12/2021	
Shire of Northampton		17/12/2021	
Shire of Nungarin		16/12/2021	
Shire of Peppermint Grove		22/12/2021	
Shire of Perenjori		7/04/2022	

Entity	Type of opinion	Opinion issued	FS timeliness
Shire of Pingelly		17/12/2021	
Shire of Plantagenet		16/12/2021	
Shire of Quairading		17/02/2022	
Shire of Ravensthorpe	Audit in progress		
Shire of Sandstone	Qualified	31/05/2022	
Shire of Serpentine-Jarrahdale		22/12/2021	
Shire of Shark Bay		5/04/2022	
Shire of Tammin		7/12/2021	
Shire of Three Springs		22/03/2022	
Shire of Toodyay	Audit in progress		
Shire of Trayning		23/11/2021	
Shire of Upper Gascoyne		11/11/2021	
Shire of Victoria Plains		23/03/2022	
Shire of Wagin		10/11/2021	
Shire of Wandering		22/12/2021	
Shire of Waroona		22/12/2021	
Shire of West Arthur		2/03/2022	
Shire of Westonia		16/12/2021	
Shire of Wickepin		9/03/2022	
Shire of Williams		18/11/2021	
Shire of Wiluna	Audit in progress		
Shire of Wongan-Ballidu		21/12/2021	
Shire of Woodanilling	Audit in progress		
Shire of Wyalkatchem		19/11/2021	
Shire of Wyndam-East Kimberley		22/02/2022	
Shire of Yalgoo	Audit in progress		
Shire of Yilgarn		16/12/2021	
Shire of York		16/12/2021	
Southern Metropolitan Regional Council		15/12/2021	
Tamala Park Regional Council		14/10/2021	
Town of Bassendean		15/12/2021	

Entity	Type of opinion	Opinion issued	FS timeliness
Town of Cambridge	Audit in progress		
Town of Claremont		22/12/2021	
Town of Cottesloe		16/12/2021	
Town of East Fremantle		14/12/2021	
Town of Mosman Park		3/12/2021	
Town of Port Hedland		9/12/2021	
Town of Victoria Park		20/01/2022	
Western Metropolitan Regional Council		18/10/2021	

Source: OAG

Appendix 2: 2019-20 disclaimers of opinion

Entity and opinion	Opinion issued
<p>Shire of Wiluna – Disclaimer of opinion</p> <p>It has not been possible to obtain sufficient appropriate audit evidence on the books and records of the Shire. This lack of evidence arises from numerous significant deficiencies in the internal controls implemented by the Shire and, in some cases, the necessary records not being adequately maintained.</p> <p>As a result of this matter, we are unable to determine if any adjustments might have been found necessary to the elements making up the Statement of Financial Position as at 30 June 2020, Statement of Comprehensive Income by Nature or Type, Statement of Comprehensive Income by Program, Statement of Changes in Equity, Statement of Cash Flows and Rate Setting Statement for the year then ended and related notes and disclosures.</p> <p>A qualified opinion was also issued for the year ended 30 June 2019 on the completeness of bank accounts for that year because we were unable to obtain a bank confirmation from a financial institution where at least one account was held for that year.</p>	<p>22/12/2021</p>
<p>Shire of Yalgoo – Disclaimer of opinion</p> <p>We were unable to obtain sufficient appropriate audit evidence on the books and records of the Shire. This lack of evidence arises from numerous significant deficiencies in the internal controls implemented by the Shire and in some cases the necessary records not being maintained.</p> <p>As a result of this matter, we are unable to determine if any adjustments might have been found necessary to the elements making up the Statement of Financial Position as at 30 June 2020, the Statement of Comprehensive Income by Nature or Type, Statement of Comprehensive Income by Program, Statement of Changes in Equity, Statement of Cash Flows and Rate Setting Statement for the year then ended, related notes and disclosures and the Statement by the Chief Executive Officer.</p>	<p>3/03/2022</p>

Source: OAG

Appendix 3: 2020-21 qualified opinions

Entity and opinion	Opinion issued
<p>Shire of Goomalling – Qualified opinion</p> <p>The Shire of Goomalling was issued a qualified opinion as the Shire’s infrastructure assets were last valued in June 2015 for roads, drainage and footpaths and June 2016 for sewerage and other infrastructure. Because these infrastructure assets have not been revalued with sufficient regularity or in accordance with Regulation 17A(4)(b) of the FM Regulations, we were unable to determine if infrastructure assets reported in Note 9 of the annual financial report at \$43,394,718 and \$38,841,166 at 30 June 2021 and 30 June 2020 respectively are stated at fair value in the Statement of Financial Position.</p> <p>Additionally, we were unable to determine where there may be any consequential impact on the related balances, amounts and disclosures of depreciation on non-current assets, revaluation surplus in the Statement of Financial Position and Statement of Comprehensive Income and Note 19 Total Assets Classified by Function and Activity, or if any adjustments to these amounts are necessary.</p> <p>We also issued a qualified opinion for the year ended 30 June 2020 in relation to this matter.</p>	<p>22/12/2021</p>
<p>Shire of Sandstone – Qualified opinion</p> <p>The Shire of Sandstone was issued a qualified opinion as the Shire’s roads and footpaths infrastructure, reported at values as at 30 June 2021 of \$37,755,629 (2020: \$36,803,492) and \$71,845 (2020: \$75,711) respectively in Note 9 of the annual financial report, were last valued in June 2014. Because the assets have not been revalued with sufficient regularity or in accordance with Regulation 17A(4)(b) of the FM Regulations, we were unable to determine if infrastructure as at 30 June 2021 of \$39,718,887 (2020: \$38,820,445) in the Statement of Financial Position is fairly stated. Additionally, we were unable to determine if any adjustments are necessary to the related balances and disclosures of revaluation surplus in the Statement of Financial Position and Statement of Changes in Equity and Note 11, Other Comprehensive Income in the Statement of Comprehensive Income and Note 17 Total Assets Classified by Function and Activity, as it was impracticable to do so.</p> <p>We also issued a qualified opinion for the year ended 30 June 2020 in relation to this matter.</p>	<p>31/05/2022</p>

Source: OAG

Appendix 4: Emphasis of matter paragraphs included in auditor's reports

The following list describes the matters that we highlighted through EoM paragraphs in 2021 audit reports:

Entity	Description of emphasis of matter paragraphs
City of Bunbury	Recording of joint venture – The City's opinion draws attention to Note 25 to the financial statements which states that the City's equity share in the Investment in Associate is still being negotiated and therefore cannot be reliably estimated at this time. Consequently, the investment is not currently reflected in the financial statements. The opinion is not modified in respect of this matter.
City of Busselton	Restatement of comparative balances – Our EoM draws attention to the City's Note 33 to the financial statements which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
City of Joondalup	Associate entity restatement and guarantee payment – Note 23 of the financial report (a) discloses the 2020 financial impact of the initial application of accounting standards AASB 1059 from the associate entity and (b) discloses a guarantee payment made by the City subsequent to the reporting date. The opinion is not modified in respect of this matter.
City of Kalgoorlie-Boulder	Restatement of comparative balances – The opinion draws attention to Note 34 to the financial report which states that the amounts reported in the previously issues 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
City of Perth	Associate entity restatement and guarantee payment – Note 32 of the financial report which (a) discloses the 2020 financial impact of the initial application of accounting standards AASB 1059 from the associated entity and (b) discloses a guarantee payment made by the City subsequent to reporting date. The opinion is not modified in respect of this matter.
City of Stirling	Associate entity restatement and guarantee payment – The City's opinion draws attention to Note 26 of the financial report which (a) discloses the 2020 financial impact of the initial application of accounting standards AASB 1059 from the associate entity and (b) discloses a guarantee payment made by the City subsequent to reporting date. The opinion is not modified in respect of this matter.
City of Vincent	Events occurring after the end of the reporting period – The City's opinion included an EoM drawing attention to Note 30 of the financial report, which discloses a payment made by the City subsequent to the reporting period. The opinion is not modified in respect of this matter. Restatement of comparative balances – The City's Opinion also includes an EoM drawing attention to Note 32 of the financial report which states that the amounts reported in the

Entity	Description of emphasis of matter paragraphs
	previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
City of Wanneroo	Associate entity restatement and guarantee payment – The City's opinion draws attention to Note 38 of the annual financial report, which discloses (a) the 2020 financial impact of the initial application of accounting standard AASB 1059 from the associate and (b) a guarantee payment made by the City subsequent to reporting date. The opinion is not modified in respect of this matter.
Mindarie Regional Council	Contingent liability – The Council's opinion included an EoM drawing attention to Note 34 which disclosed a contingent liability relating to the Tamala Park Waste Management Facility site. The opinion is not modified in respect of this matter.
Pilbara Regional Council	Basis of accounting – The Council's opinion draws attention to Note 1(a) of the annual financial report, which discloses that the Council has decided to wind up. Consequently, the annual financial report has been prepared on a liquidation basis. The opinion is not modified in respect of this matter.
Rivers Regional Council	Basis of accounting – The Council's opinion draws attention to Note 1(a) of the annual financial report, which discloses that the Council has decided to wind up after ministerial approval is received for the formation of a regional subsidiary. Consequently, the annual financial report has been prepared on a liquidation basis. The opinion is not modified in respect of this matter.
Shire of Carnamah	Restatement of comparative balances – The Shire's opinion draws attention to Note 24 (correction of error) and subsequently Note 27 (financial ratios) to the financial report which states that the amounts reported in the previously issued 30 June 2020 (including comparative figures) financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Shire of Christmas Island	Restatement of comparative balances – The Shire's opinion draws attention to Note 29 of the financial statements which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Shire of Cocos (Keeling) Islands	Restatement of comparative balances – The Shire's opinion draws attention to Note 25 of the financial report which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Shire of Coorow	Restatement of comparative figures – The Shire's opinion draws attention to Note 31 to the financial statements which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.

Entity	Description of emphasis of matter paragraphs
Shire of East Pilbara	Restatement of comparative figures – The Shire's opinion draws attention to Note 29 of the financial report which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Shire of Gingin	Restatement of comparative figures – The EoM paragraph draws attention to Note 30 to the financial statements which states that the amounts reported in the previously issued 30 June 2020 annual financial report have been restated and disclosed as comparatives in this annual financial report. The opinion is not modified in respect of this matter.
Shire of Halls Creek	Restatement of comparative balances – The Shire's opinion draws attention to Note 26 to the financial statements which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Shire of Harvey	Recording of joint venture – The EoM paragraph draws attention to Note 26 to the financial statements which states that the Shire's equity share in the Investment in Associate is still being negotiated and therefore cannot be reliably estimated at this point of time. Consequently, the investment is not currently reflected in the financial statements. The opinion is not modified in respect of this matter.
Shire of Meekatharra	Basis of accounting – The EoM paragraph draws attention to Note 1 to the financial report, which describes the basis for accounting. The financial report has been prepared for the purpose of fulfilling the Shire's financial reporting responsibilities under the Act. Regulation 17A of the FM Regulations requires a local government to measure vested improvements at fair value and the associated vested land at zero cost. This is a departure from AASB 16 Leases which would have required the entity to measure the vested improvements also at zero cost. The opinion is not modified in respect of this matter.
Shire of Mingenew	Basis of accounting – The Shire's opinion included an EoM drawing attention to Note 28 of the financial statements which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Shire of Plantagenet	Restatement of comparative balances – The Shire's opinion draws attention to Note 29 to the financial statements which states that the amounts reported in the previously issued 30 June 2020 financial report have been restated and disclosed as comparatives in this financial report. The opinion is not modified in respect of this matter.
Tamala Park Regional Council	Basis of accounting – The Council's opinion draws attention to Notes 1 and 10 to the financial report, which describes the basis for accounting. The financial report has been prepared for the purpose of fulfilling the Council's financial reporting responsibilities under the Act. Regulation 17A of the

Entity	Description of emphasis of matter paragraphs
	FM Regulations requires a local government to measure vested improvements at fair value and the associated vested land at zero cost. This is a departure from AASB 16 Leases which would have required the entity to measure the vested improvements also at zero cost. The opinion is not modified in respect of this matter.
Town of Victoria Park	Basis of accounting – The Town's opinion draws attention to Note 36 of the annual financial report, which (a) discloses the 2020 financial impact of the initial application of accounting standards AASB 1059 from the associate entity and (b) discloses a guarantee payment made by the Town subsequent to reporting date. The opinion is not modified in respect of these matters.

Source: OAG

Appendix 5: Material matters of non-compliance with legislation

Issue	Finding
<p>Financial ratios not reported</p>	<p>Twenty-eight entities did not report the Asset Renewal Funding Ratio, mostly for the three years, 2020, 2019 and 2018, in their annual financial report as required by FM Regulation 50(1)(c). Reasons for non-reporting included:</p> <ul style="list-style-type: none"> • management had not updated the asset management plan for a number of years • planned capital renewals and required capital expenditures were not estimated as required to support the long term financial plan and asset management plan respectively • management could not confirm the reliability of the available information on planned capital renewals and required capital expenditure • information on planned capital renewals and required capital expenditure over a 10 year period was not available.
<p>Quotes not obtained or no evidence retained</p>	<p>At 22 entities there was inadequate or no evidence that enough quotations were obtained to test the market and no documentation to explain why other quotes were not sought. This practice increases the likelihood of not receiving value for money in procurement and/or favouritism of suppliers.</p>
<p>Controls over accounting journal entries</p>	<p>At 13 entities we found that accounting journal entries were often posted to the financial ledger with no evidence of independent review and approval by another person. Accounting journals can represent significant adjustments to previously approved accounting transactions and could result in, for example, one type of expenditure being re-coded to another type of expenditure. If not closely controlled, unauthorised journals could result in errors in financial reports or fraud. Journals should therefore be subject to independent review.</p>
<p>Financial management review not completed</p>	<p>At 13 entities the Financial Management Review was not completed every three years as required by Regulation 5(2)(c) of the FM Regulations. This regulation requires the CEO to undertake reviews of the appropriateness and effectiveness of the financial management systems and procedures of the local government regularly (and not less than once in every three financial years) and report those reviews to the local government.</p>
<p>Masterfile changes and access</p>	<p>At 12 entities changes made to the supplier master files were not independently reviewed and approved by a staff member. This increases the risk of unauthorised changes to key information and may make fraud or error more difficult to detect.</p>
<p>Bank reconciliation process incomplete</p>	<p>At 12 entities bank reconciliation processes of their municipal, reserve and/or trust account were not prepared, had long</p>

Issue	Finding
	outstanding unreconciled items and/or there was no independent review by management.
Procurement without purchase orders	At seven entities purchase orders were not prepared or were prepared after the suppliers' invoices were received.
No fixed asset reconciliation	At seven entities monthly reconciliations of fixed assets were not completed for the majority of the financial year. This increased the risk of misstatements, fraud and errors not being detected in a timely manner.
Payroll and human resources findings	<p>Several findings of payroll and employment non-compliance were also reported at seven entities. Some examples include:</p> <ul style="list-style-type: none"> • a lack of segregation of duties as the staff member preparing the payroll and entering new employees into the system is also the first authoriser of payroll payments through the shire's bank account, increasing the risk of unauthorised or fraudulent transactions • payroll reconciliations not performed regularly to reconcile the payroll report to the general ledger • no formal policy or procedure in place to remove user access on termination of staff. This could lead to inappropriate access to shire information and possible financial loss to the shire if not addressed.
Procurement without appropriate segregation of duties	At five entities we identified the same officer requisitioned, approved and raised the purchase order then also approved the associated invoice payment for a significant proportion of sampled purchase transactions.
Review not performed of risk management, internal control and legislative compliance	At four entities a review of systems and procedures in relation to risk management, internal control and legislative compliance was not completed at least once every three years as required by LG Audit Regulation 17.
Depreciation	Three entities did not have adequate controls to determine if depreciation was being correctly calculated and recorded for certain infrastructure assets. This increased the risk of expenses being understated and assets being overstated.
Accessed monies in reserve to fund operations	At one entity, a review of the cash and cash equivalents account revealed that the entity has accessed monies in reserve accounts to fund its operations. This is a breach of section 6.11(2)(a) of the LG Act, which requires the entity to give one month's local public notice if the money in a reserve account is proposed to be used for another purpose.
Procurement without tender	At one entity, we identified no public tenders were invited for a contract with the value above \$250,000 as required by section 11(1) of the Local Government (Functions and General) Regulations 1996. This increases the likelihood of not receiving value for money in procurement, and/or favouritism of suppliers.
Records not presented to Council meetings as required by FM Regulations	At one entity the statements of financial activity for the months of October and December 2020 were not prepared and presented to Council as required by section 6.4 of the LG Act and Regulation 34(1) of the FM Regulations.

Issue	Finding
<p>Other procurement and miscellaneous findings</p>	<p>We reported other instances of non-compliance with procurement policies and procedures such as:</p> <ul style="list-style-type: none"> • credit card transactions were not separately listed in the payments submitted to council each month as required by Regulation 13(1) of the FM Regulations. We also found an instance where staff allocated a credit card did not sign the credit card acknowledgement form prior to using the card • insufficient documentation to demonstrate and evidence the on-going management of contract progress and supplier performance from contract award through to completion for its infrastructure projects • at one entity the purchasing policy is silent on declaring conflicts of interest in relation to open tenders. It has also not been reviewed since 2011. This entity’s buying goods and service’s manual, supporting the purchasing policy, has not been reviewed since 2012 • non-compliance with the <i>Unclaimed Money Act 1990</i> that requires monies over \$100 be transferred to the Department of Treasury if they have been held for six years without being returned to owners.
<p>General computer control findings</p>	<p>In depth findings of our information system audits at a selection of 45 entities are detailed in our <i>Information Systems Audit Report 2022 - Local Government Entities</i>, Report 22, tabled on 28 June 2022.</p> <p>In 2020-21, we reported 358 control weaknesses to 45 entities. Ten percent (37) of these rated as significant and 71% (254) as moderate. As these weaknesses could significantly compromise the confidentiality, integrity and availability of information systems, the entities should act promptly to resolve them.</p>

Source: OAG

Appendix 6: Certifications issued

In addition to annual auditor's reports, some entities needed to acquit moneys received from other sources under grant agreements or other legislation. We issued the following 275 certifications on statements of income and expenditure of entities, to help them discharge their financial reporting obligations, some being for Commonwealth grants.

Entity	Date certification issued	
	Roads to Recovery Funding under the <i>National Land Transport Act 2014</i>	Local Roads and Community Infrastructure Program
City of Albany	28/10/2021	29/10/2021
City of Armadale	16/11/2021	16/11/2021
City of Bayswater	29/10/2021	In progress
City of Belmont	26/10/2021	26/10/2021
City of Bunbury	29/10/2021	29/10/2021
City of Busselton	25/10/2021	26/10/2021
City of Canning	28/10/2021	28/10/2021
City of Cockburn	28/10/2021	29/10/2021
City of Fremantle	27/10/2021	In progress
City of Gosnells	29/10/2021	29/10/2021
City of Greater Geraldton	28/10/2021	28/10/2021
City of Joondalup	25/10/2021	26/10/2021
City of Kalamunda	26/10/2021	29/10/2021
City of Kalgoorlie-Boulder	21/03/2022	23/02/2022
City of Karratha	27/10/2021	27/10/2021
City of Kwinana	28/10/2021	29/10/2021
City of Mandurah	5/11/2021	5/11/2021
City of Melville	19/11/2021	19/11/2021
City of Nedlands	29/10/2021	In progress
City of Perth	26/10/2021	29/10/2021
City of Rockingham	29/10/2021	29/10/2021
City of South Perth	29/10/2021	1/11/2021
City of Subiaco	29/10/2021	29/10/2021
City of Stirling	8/10/2021	18/01/2021
City of Swan	29/10/2021	29/10/2021
City of Vincent	29/10/2021	28/10/2021
City of Wanneroo	28/10/2021	29/10/2021
Shire of Ashburton	7/12/2021	13/12/2021
Shire of Augusta-Margaret River	28/10/2021	18/02/2022
Shire of Beverley	28/10/2021	18/11/2021

Entity	Date certification issued	
	Roads to Recovery Funding under the <i>National Land Transport Act 2014</i>	Local Roads and Community Infrastructure Program
Shire of Boddington	2/02/2022	2/02/2022
Shire of Boyup Brook	29/10/2021	In progress
Shire of Bridgetown-Greenbushes	5/11/2021	22/11/2021
Shire of Brookton	5/11/2021	31/01/2022
Shire of Broome	26/10/2021	26/10/2021
Shire of Broomehill-Tambellup	In progress	In progress
Shire of Bruce Rock	27/10/2021	27/10/2021
Shire of Capel	8/12/2021	8/12/2021
Shire of Carnamah	29/10/2021	29/10/2021
Shire of Carnarvon	12/11/2021	16/11/2021
Shire of Chapman Valley	25/10/2021	28/10/2021
Shire of Chittering	26/05/2022	29/04/2022
Shire of Christmas Island	28/10/2021	18/11/2021
Shire of Cocos (Keeling Islands)	1/12/2021	7/12/2021
Shire of Collie	16/11/2021	18/11/2021
Shire of Coolgardie	14/12/2021	8/02/2022
Shire of Coorow	1/12/2021	16/11/2021
Shire of Corrigin	27/10/2021	27/10/2021
Shire of Cranbrook	26/10/2021	30/09/2021
Shire of Cuballing	28/10/2021	4/11/2021
Shire of Cue	11/11/2021	17/12/2021
Shire of Cunderdin	2/05/2022	2/03/2022
Shire of Dalwallinu	28/10/2021	8/03/2022
Shire of Dandaragan	29/10/2021	29/10/2021
Shire of Dardanup	27/04/2022	27/04/2022
Shire of Denmark	28/10/2021	29/10/2021
Shire of Derby-West Kimberley	30/03/2022	17/06/2022
Shire of Donnybrook-Balingup	9/11/2021	15/12/2021
Shire of Dowerin	11/11/2021	15/12/2021
Shire of Dumbleyung	26/10/2021	28/10/2021
Shire of Dundas	3/12/2021	6/05/2022
Shire of East Pilbara	3/05/2022	In progress
Shire of Esperance	23/03/2022	23/03/2022
Shire of Exmouth	25/10/2021	28/10/2021
Shire of Gingin	31/10/2021	22/11/2021

Entity	Date certification issued	
	Roads to Recovery Funding under the <i>National Land Transport Act 2014</i>	Local Roads and Community Infrastructure Program
Shire of Gnowangerup	29/10/2021	29/10/2021
Shire of Goomalling	29/10/2021	22/04/2022
Shire of Halls Creek	19/11/2021	29/10/2021
Shire of Harvey	1/11/2021	26/11/2021
Shire of Irwin	29/10/2021	26/10/2021
Shire of Jerramungup	12/10/2021	23/12/2021
Shire of Katanning	3/11/2021	22/12/2021
Shire of Kellerberrin	26/10/2021	23/08/2021
Shire of Kent	29/10/2021	26/10/2021
Shire of Kojonup	26/10/2021	28/10/2021
Shire of Kondinin	28/10/2021	29/10/2021
Shire of Koorda	5/11/2021	31/03/2022
Shire of Kulin	9/12/2021	6/12/2021
Shire of Lake Grace	29/10/2021	26/11/2021
Shire of Laverton	29/10/2021	13/12/2021
Shire of Leonora	26/10/2021	3/11/2021
Shire of Manjimup	28/10/2021	17/02/2022
Shire of Meekatharra	25/10/2021	27/10/2021
Shire of Menzies	21/12/2021	17/02/2022
Shire of Merredin	28/06/2022	29/06/2022
Shire of Mingenew	27/10/2021	29/10/2021
Shire of Moora	22/12/2021	In progress
Shire of Morawa	28/10/2021	28/10/2021
Shire of Mount Magnet	28/10/2021	29/10/2021
Shire of Mount Marshall	27/10/2021	27/10/2021
Shire of Mukinbudin	25/02/2022	25/02/2022
Shire of Mundaring	29/10/2021	13/12/2021
Shire of Murchison	22/03/2022	21/03/2022
Shire of Murray	28/10/2021	29/10/2021
Shire of Nannup	8/12/2021	In progress
Shire of Narembeen	28/10/2021	28/10/2021
Shire of Narrogin	26/10/2021	26/10/2021
Shire of Northam	3/11/2021	3/11/2021
Shire of Northampton	26/10/2021	1/12/2021
Shire of Nungarin	29/10/2021	29/10/2021

Entity	Date certification issued	
	Roads to Recovery Funding under the <i>National Land Transport Act 2014</i>	Local Roads and Community Infrastructure Program
Shire of Ngaanyatjarraku	28/10/2021	29/10/2021
Shire of Peppermint Grove	In progress	In progress
Shire of Perenjori	28/10/2021	28/10/2021
Shire of Pingelly	29/10/2021	29/10/2021
Shire of Plantagenet	26/10/2021	27/10/2021
Shire of Quairading	8/11/2021	25/03/2022
Shire of Ravensthorpe	21/12/2021	21/12/2021
Shire of Sandstone	3/11/2021	In progress
Shire of Serpentine-Jarrahdale	1/11/2021	1/11/2021
Shire of Shark Bay	25/10/2021	26/10/2021
Shire of Tammin	26/10/2021	29/10/2021
Shire of Three Springs	29/10/2021	2/11/2021
Shire of Toodyay	29/10/2021	29/10/2021
Shire of Trayning	27/10/2021	29/10/2021
Shire of Upper Gascoyne	27/10/2021	27/10/2021
Shire of Victoria Plains	17/11/2021	17/11/2021
Shire of Wagin	29/10/2021	31/03/2022
Shire of Wandering	3/11/2021	5/11/2021
Shire of Waroona	28/10/2021	28/10/2021
Shire of West Arthur	29/10/2021	29/10/2021
Shire of Westonia	27/10/2021	25/02/2022
Shire of Wickelpin	29/10/2021	16/05/2022
Shire of Williams	29/10/2021	23/12/2021
Shire of Wiluna	In progress	In progress
Shire of Wongan-Ballidu	29/10/2021	In progress
Shire of Woodanilling	23/02/2022	13/05/2022
Shire of Wyalkatchem	26/10/2021	28/10/2021
Shire of Yalgoo	22/03/2022	22/03/2022
Shire of Yilgarn	24/11/2021	23/11/2021
Shire of York	27/10/2021	27/10/2021
Shire of Wyndham-East Kimberley	6/05/2022	In progress
Town of Bassendean	29/10/2021	29/10/2021
Town of Cambridge	28/10/2021	1/11/2021
Town of Claremont	3/11/2021	10/11/2021
Town of Cottesloe	26/10/2021	21/12/2021

Entity	Date certification issued	
	Roads to Recovery Funding under the <i>National Land Transport Act 2014</i>	Local Roads and Community Infrastructure Program
Town of East Fremantle	8/10/2021	Deferred*
Town of Mosman Park	29/10/2021	29/10/2021
Town of Port Hedland	4/04/2022	28/02/2022
Town of Victoria Park	30/10/2021	30/10/2021

Source: OAG

* Approval obtained from the Commonwealth to defer certification of financial statements

Entity	Date certification issued
Claims by administrative authorities – Pensioner deferments under the <i>Rates and Charges (Rebates and Deferments) Act 1992</i>	
City of Belmont	2/03/2022
City of Busselton	1/11/2021
City of Joondalup	2/11/2021
City of Kalamunda	8/12/2021
City of South Perth	2/11/2021
City of Vincent	10/11/2021
Shire of Dandaragan	17/01/2022
Shire of Narrogin	25/02/2022
Shire of York	21/12/2021
Town of Cambridge	4/01/2022
Town of Mosman Park	15/12/2021

Source: OAG

Entity certification	Date certification issued
Other certifications	
City of Kalamunda – Development Contribution Area 1 – Forrestfield Light Industrial Area Stage 1	8/12/2021
Shire of Brookton – Drought Communities Programme - Extension	17/09/2021
Shire of Dandaragan – Jurien Bay Civic Centre Outgoings	20/01/2022

Source: OAG

Appendix 7: Other opinions and certifications issued since 18 November 2021

State government entity opinions

Entity	Opinion relates to	Opinion issued
Albany Cemetery Board	Audit report on the Statement of Financial Position at 30 June 2021	15/12/2021
Bunbury Cemetery Board	Audit report on the Statement of Financial Position at 30 June 2021	4/02/2022
Kalgoorlie-Boulder Cemetery Board	Audit report on the Statement of Financial Position at 30 June 2020	21/12/2021
Kalgoorlie-Boulder Cemetery Board	Audit report on the Statement of Financial Position at 30 June 2021	21/02/2022

Source: OAG

State government entity certifications

The following certifications were for the year ended 30 June 2021. The statements prepared by management were confirmed and no adverse reports were issued.

Entity	Certification relates to	Date issued
Commissioner of Main Roads	Statement of amounts expended or retained for expenditure under the Land Transport Infrastructure Projects (<i>National Land Transport Act 2014</i>).	10/12/2021
Commissioner of Main Roads	Statement of amounts expended or retained for expenditure under the National Partnership on Infrastructure Projects in Western Australia.	10/12/2021
Department of Local Government, Sport and Cultural Industries	Statement of payments made to Local Governments under the <i>Local Government (Financial Assistance) Act 1995</i> .	26/11/2021

Source: OAG

Royalties for Regions certifications

Entity	Royalties for Regions approved project	Date issued
Department of Primary Industries and Regional Development	Gascoyne Foodbowl Land Release	3/02/2022
Department of Treasury	Governance of Royalties for Regions Program	3/12/2021
WA Country Health Service	Albany Radiation Oncology	29/11/2021
	Bunbury Hospital Redevelopment	29/11/2021
	Carnarvon Residential Aged Care Facility	29/11/2021
	Collie Hospital Upgrade	29/11/2021

Entity	Royalties for Regions approved project	Date issued
	Derby Community Health Service	29/11/2021
	Digital Innovation, Transport and Access to Care	29/11/2021
	Dongara Aged Care	29/11/2021
	Country Health Innovation – Emergency and Acute Workforce	29/11/2021
	Expand the Ear Bus Program	29/11/2021
	Geraldton Health Campus Redevelopment	29/11/2021
	Kalgoorlie Health Campus Magnetic Resonance Imaging Suite	29/11/2021
	Karratha Health Campus	29/11/2021
	Kimberley Mobile Dialysis Unit	29/11/2021
	Meet and Greet Unit	29/11/2021
	Newman Health Service Redevelopment Project	29/11/2021
	Nickol Bay Hospital Site	29/11/2021
	Onslow Health Service Redevelopment Project	29/11/2021
	Pilbara Health Initiative Phase 3	29/11/2021
	Remote Indigenous Health Clinics	29/11/2021
	Renal Dialysis Services	29/11/2021
	Renal Hostels	29/11/2021
	Residential Aged and Dementia Care Investment Program	29/11/2021
	Southern Inland Health Initiative – Stream 2a, 3 and 4	29/11/2021
	Tom Price Hospital Redevelopment	29/11/2021

Source: OAG

This page is intentionally left blank

This page is intentionally left blank

Auditor General's 2022-23 reports

Number	Title	Date tabled
4	Payments to Subcontractors Working on State Government Construction Projects	11 August 2022
3	Public Trustee's Administration of Trusts and Deceased Estates	10 August 2022
2	Financial Audit Results – Universities and TAFEs 2021	21 July 2022
1	Opinion on Ministerial Notification – Wooroloo Bushfire Inquiry	18 July 2022

**Office of the Auditor General
Western Australia**

7th Floor Albert Facey House
469 Wellington Street, Perth

T: 08 6557 7500
E: info@audit.wa.gov.au

www.audit.wa.gov.au



@OAG_WA



Office of the Auditor General
for Western Australia

ITEM 8 STANDING ITEMS – RISK MANAGEMENT REPORTS AND ISSUES**8.1 Report on excess annual leave and long service leave**

Responsible Officer	Nicole Gibbs, Chief Executive Officer
Reporting Officer	Leah Horton, Executive Manager, Corporate Services
Attachments	Nil
Voting Requirements	Simple Majority
Disclosure of Interest	Reporting Officer: Nil. Responsible Officer: Nil.

OFFICER RECOMMENDATION

That the Audit & Risk Committee recommends to Council that; Council receive the report on the Shire's leave liabilities.

IN BRIEF

- Since 2017, Council has requested that excess annual leave and long service leave be reported to the Audit and Risk Committee.
- Not taking a reasonable amount of annual leave or long service leave may pose a threat to the health and safety of employees and represent a significant financial liability for the Shire, therefore there are steps in place to ensure that leave balances are monitored and are at appropriate levels.
- Employee entitlement movements during the year are due to many reasons, such as, leave taken during the period, increased accrued leave balances, increases in remuneration rates and changes in the underlying staff with leave balances transferred to and from the Shire.

MATTER FOR CONSIDERATION

Receipt of the report on excess annual leave and long service leave entitlements and leave liabilities.

BACKGROUND

Since 2017, Council has requested that excess annual leave and long service leave be reported to the Audit and Risk Committee.

The current Leave Management Policy defines "excess leave" as when the employee has accrued more than eight weeks paid annual leave and provides management with direction to effectively management the annual and long service leave entitlements of employees.

The Shire encourages employees to take leave by reinforcing the positive benefits of taking leave when it becomes due. Sometimes there are circumstances that prevent leave being able to be taken, such as staff shortages, outside influences (COVID-19 travel restrictions), and work demands.

There will be movements in employee entitlements throughout the year. Balances will increase naturally as employees accrue leave entitlements and when leave balances are transferred from other Shires. Balances will decrease when employees take leave accrued and when leave balances are transferred to other Shires. This natural fluctuation is monitored by management and through this report to ensure any excess is managed appropriately.

STATUTORY ENVIRONMENT

Fair Work Act 2009

Local Government Act 1995

Local Government (Financial Management) Regulations 1996

Local Government (Long Service Leave Regulations)

National Employment Standards

Local Government Industry Award 2020

23.6 Excessive leave accruals: general provision

(a) An employee has an **excessive leave accrual** if the employee has accrued more than 8 weeks' paid annual leave (or 10 weeks' paid annual leave for a shift worker, as defined by clause [23.2](#)).

(b) If an employee has an excessive leave accrual, the employer or the employee may seek to confer with the other and genuinely try to reach agreement on how to reduce or eliminate the excessive leave accrual.

POLICY IMPLICATIONS

Leave Management Policy

FINANCIAL IMPLICATIONS

The Employee Entitlements (Annual and Long Service Leave) reserve fund cash balance as of 31 October 2022 is \$167,503.52.

The annual budget treats current leave as accruals.

The annual and long service leave reserve funds any prior year leave entitlements taken by staff or paid out.

The current liability for both types of leave (if all claimed on 20 November 2022) is calculated at \$129,296.

There is currently surplus in the reserve account in comparison to the liability accrued of \$38,207. This will be reviewed further through the finalisation of the annual financial report, with a recommendation provided as to either keep the funds in surplus in this reserve for future leave liabilities, or to redistribute back to municipal funds in reimbursement for entitlements paid during 2021/2022 and 2022/2023, which could be done through the budget review process.

ALIGNMENT WITH STRATEGIC PRIORITIES

5.3 Governance & Leadership: Provide informed and transparent decision making that, meets our legal obligations, and the needs of our diverse community

5.4 Governance & Leadership: Implement systems and processes that meet legislative and audit obligations

CONSULTATION

Nil.

RISK ASSESSMENT

	Option 1
Financial	Low <i>Financial exposure and therefore risk escalation occurs if Leave accruals are not monitored and managed. Adequate reserve balances reduce the risk of financial exposure.</i>
Health	Low
Reputation	Low
Operations	Low <i>Impact to operations where employees with excess leave are requested to take leave. This can be mitigated by agreement of mutually acceptable timeframes for taking leave that are not during heavy workload times.</i>
Natural Environment	Low

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Critical
Rare	LOW Accept the risk Routine management	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Unlikely	LOW Accept the risk Routine management	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review
Possible	LOW Accept the risk Routine management	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review
Likely	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	HIGH Quarterly senior management review	EXTREME Monthly senior management review
Almost certain	MEDIUM Specific responsibility and treatment	MEDIUM Specific responsibility and treatment	HIGH Quarterly senior management review	EXTREME Monthly senior management review	EXTREME Monthly senior management review

COMMENT

This report has been prepared to inform the Audit and Risk Committee of the current leave liabilities and of any employees who have excess leave and the steps taken to reduce these liabilities.

As at 20 November 2022 there has been minimal change overall to both the annual leave and long service leave liabilities, reflective of very few employee movement (separations and additions) since the previous report to 28 August 2022.

Three employees with annual leave balances have separated during this time, being paid out their accrued entitlements upon termination. There have been four new employees onboarded who have started to accrue leave entitlements.

The 2022/23 pay increase was applied in September 2022 and backdated to 01 July 2022, this has affected many employees leave dollar value, as the hours entitled are now multiple by the new pay rate.

Annual Leave: Three employees who had annual leave accruals have separated, removing their annual leave entitlement on termination. One of these separated employees had a large annual leave balance paid out upon separation, reflected in the dollar value decrease between September and October 2022.

Some employees have taken leave during the period with eight employees balances reducing since August 2022, however overall, the rest of the workforce entitlements increased.

We have recruited four new employees who have all accrued minimal hours. Fifteen employees with annual leave balances have received the 22/23 annual pay increase, which has increased their entitlement balance.

There are currently no employees with excess annual leave. The one employee who was in excess as of the previous report (28 August 2022) has taken annual leave to reduce their balance to an acceptable level.

There has been a decrease of 16% (dollar value) in the annual leave liability since January 2022.

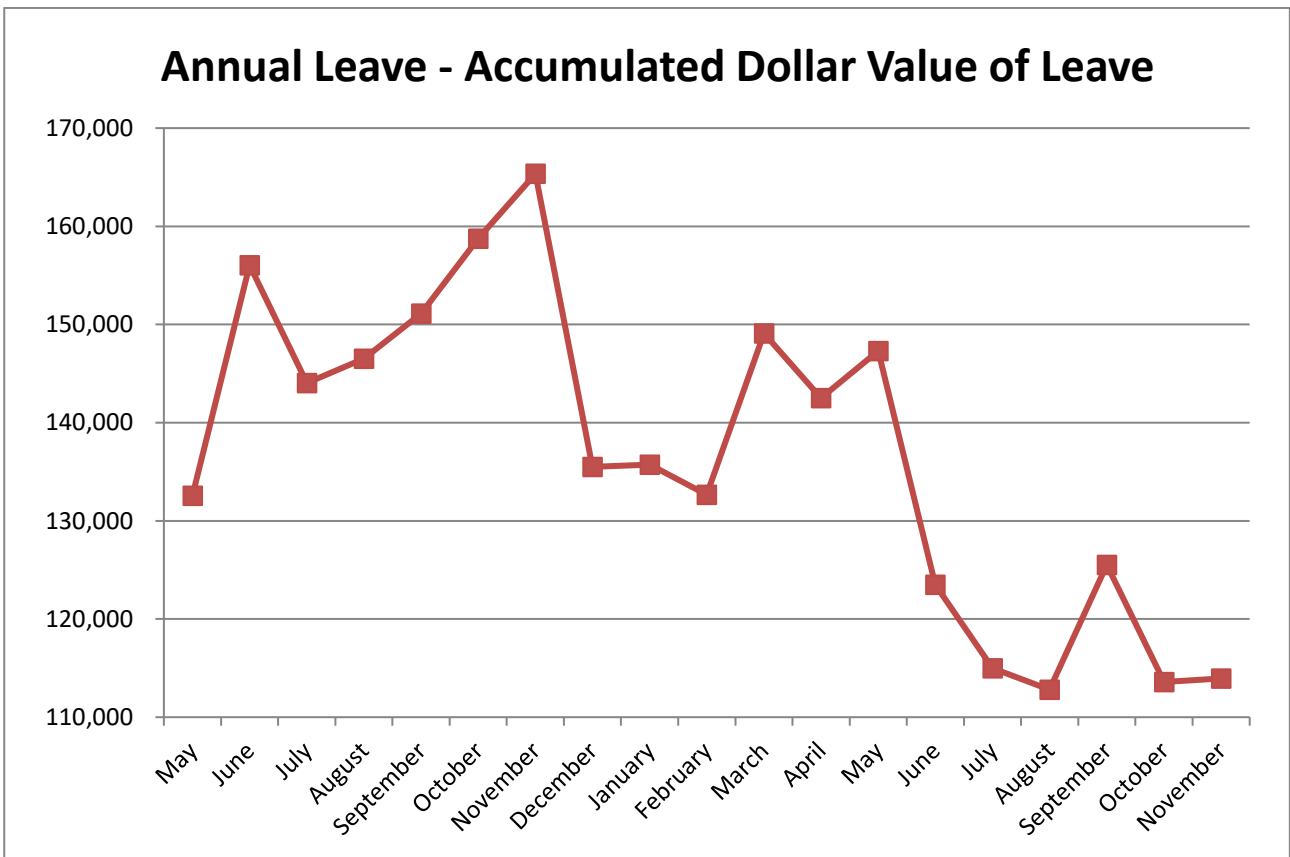
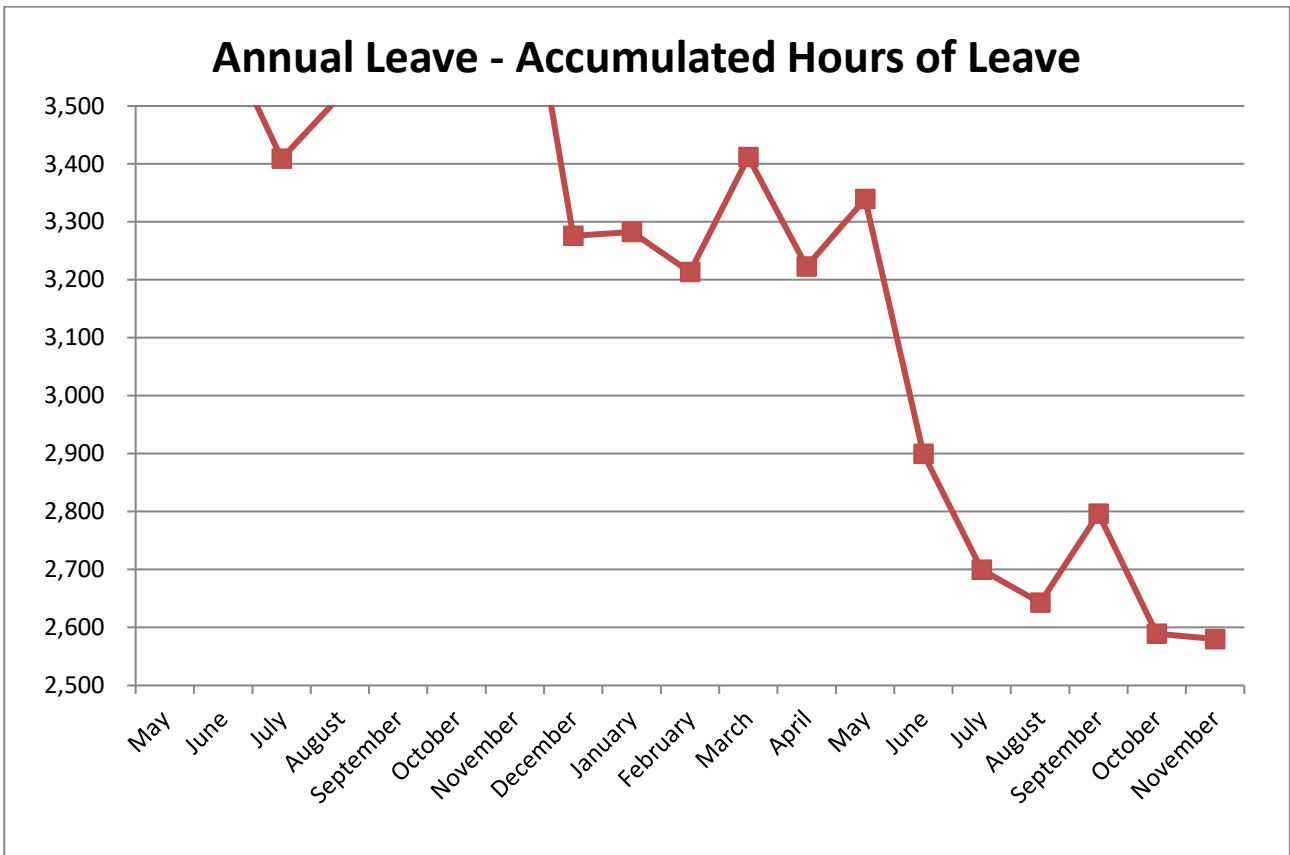
Long Service Leave: There have been no separations that affected long service leave.

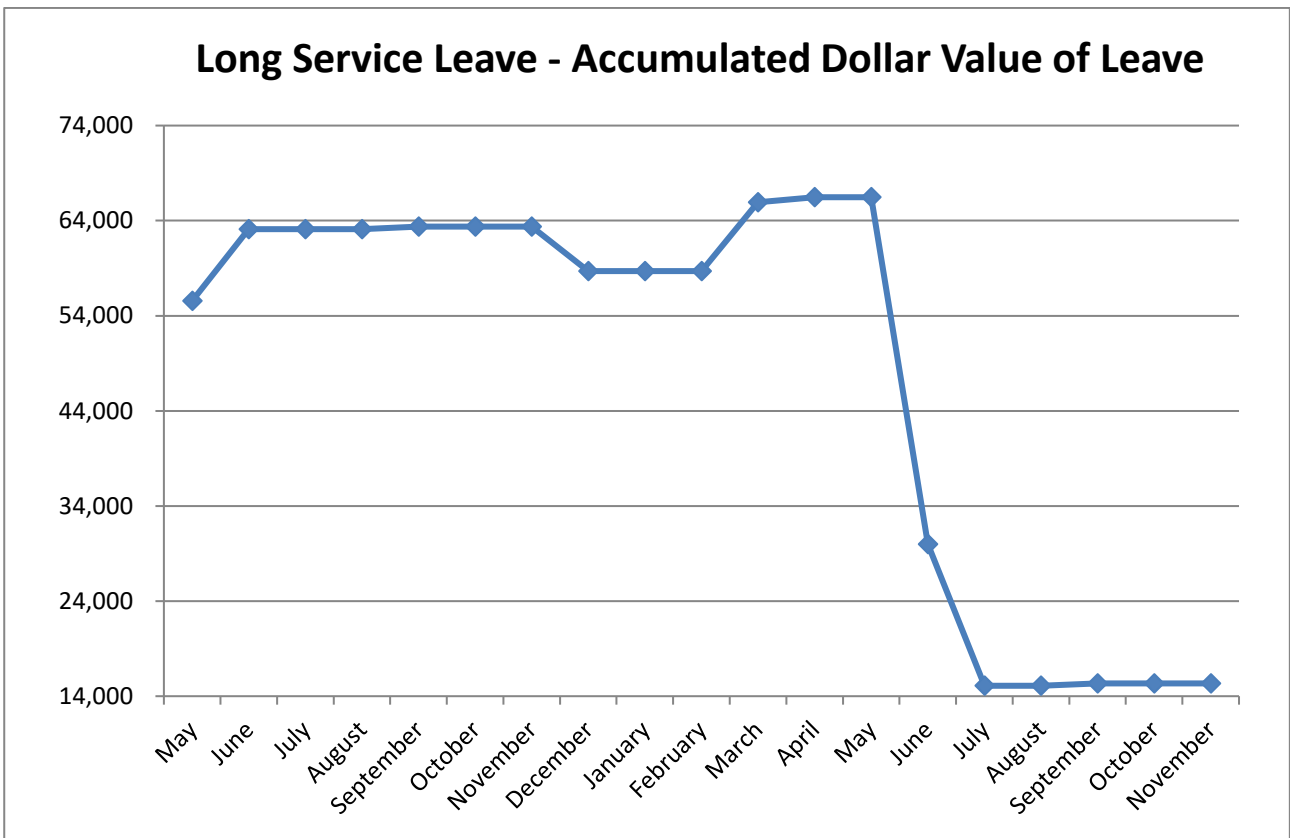
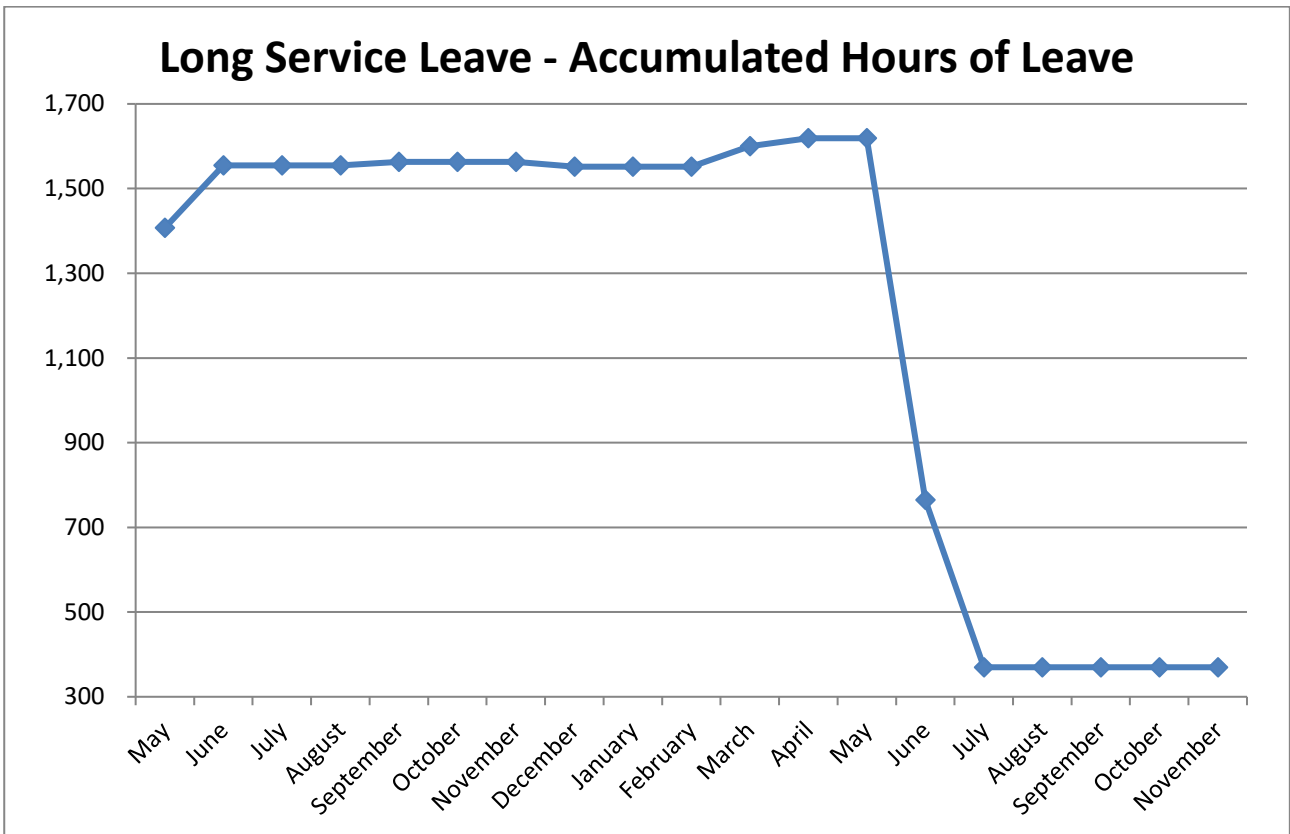
No employees long service leave accrual amount (hours entitled) has increased. Two employees with LSL entitlements have received pay rate increases, therefore the LSL entitlement balance has been wholly affected by the increase in pay rate, which has a minimal impact.

There has been a decrease of 74% (dollar value) in the long service leave liability since January 2022.

The following table and graphs show the fluctuations in the accrued hours and dollar values of both annual leave and long service leave over the period of January 2022 to 20 November 2022.

Month	LSL Hours	LSL \$	A/L Hours	A/L \$
January	1,552	58,708	3,282	135,728
February	1,552	58,708	3,213	132,665
March	1,600	65,929	3,412	149,101
April	1,619	66,465	3,223	142,510
May	1,619	66,465	3,340	147,293
June	765	29,969	2,899	123,503
July	370	15,095	2,700	114,979
August	370	15,095	2,643	112,809
September	370	15,355	2,796	125,527
October	370	15,355	2,589	113,594
November	370	15,355	2,580	113,941





ITEM 9 EMERGING ISSUES/LATE ITEMS

ITEM 10 NEXT MEETING DATE

The next Audit & Risk Committee Meeting is scheduled to take place on Tuesday 14th March 2023, commencing at 5.00pm in the Council Chambers, 10 Jennaberring Road, Quairading, WA.

ITEM 11 CLOSURE

There being no further business, the Chairperson closed the meeting at _____ pm.