# Blind and Low Vision Network NZ

## Audit Closing Report to the Members of the Board

Year ended 31 December 2023

## Contents

Audit summary

Audit focus areas

Focus areas

Other focus areas

Summary of adjusted and unadjusted audit differences

Areas for improvement

Communication of other matters

Helpful resources

## Audit summary

We are pleased to present our report for the audit of Blind and Low Vision Network NZ for the year ended 31 December 2023. We’d like to express our appreciation for the cooperation and assistance which we received during the course of our audit from all the staff at the school and from the team at your accounting service provider. This report summarises our audit approach and findings as well as providing any recommendations for areas of improvement identified during the audit process. Our examination may not have identified, and should not be relied upon to identify, all control weaknesses that may exist.

## Independence

William Buck’s independence has been confirmed by all engagement team members.

## Audit Opinion

We issued an unmodified audit opinion over the financial report for the year ended 31 December 2023.

## Responsibility for the Financial Report

The Board is responsible for preparing financial statements in accordance with the Public Benefit Entity International Public Sector Accounting Standards Reduced Disclosure Regime (PBE IPSAS RDR). The responsibility for producing the financial report and ensuring adequate internal controls and sound business practices is the responsibility of management and is a part of management's overall responsibility for the ongoing activities of the School.

## Audit Focus Areas Identified

* Cyclical Maintenance
* Probity of Expenses
* Management Override of Controls
* Fraud Risk in Revenue

## Areas of improvement

* Cyclical maintenance
* Deficit budget

Our audit work does not examine all transactions of the School. We test significant transactions and select a sample of other transactions. We apply a principal of materiality throughout our testing.

We trust that you find this report informative, and we appreciate the opportunity to be of service to you. If you have any queries or wish to discuss any issues further, please do not hesitate to contact me.

Yours sincerely,

Bonita Swanepoel

Director

# Audit focus areas

We identified the following risk areas within the financial report. We have summarised areas with significant risk or material adjustments below:

## Focus areas

Cyclical maintenance provision. Risk – Higher. Management judgement – yes. Area of improvement – yes.

Probity of expenses. Risk – Higher

Management override of controls. Risk – Significant

Fraud risk in revenue. Risk – Higher.

### Legend

Significant – Matters identified which had a high impact on the financial statements and/or audit.

Higher - Matters identified which had a moderate impact on the financial statements and/or audit.

Lower – Matter identified which had a low impact on the financial statements and/or audit.

# Focus areas

## Cyclical Maintenance

### Description of risk

One of the key areas of audit focus from the Office of the Audit General (OAG) is Cyclical Maintenance Provision (CMP). This is a key subjective item in the financial statements which requires annual assessment by both School Management and the Board.

### Audit approach

Our procedures include:

* Testing the methodology and calculations
* Reviewing experts' opinions
* Testing for completeness
* Testing of underlying assumptions
* Analysis of recent maintenance expenditure
* Review the Schools 10 year property plan
* Reviewing the Boards assessment of the Cyclical Maintenance programme.

### Testing approach

**Dial – Closer to purely substantive**

A purely substantive approach, uses William Buck sample methodology to select samples for testing to supporting documents combined with analytical procedures which identify unexpected variances and changes year on year.

A more controls-based approach, uses William Buck sample methodology to test key controls over significant risk items.

### Summary of results

Based on our testing we did not note any material error in the CMP at 31 December 2022.

The CMP is not based on the schools 10 Year Property plan. We recommend that in future this must be included.

The CMP is not based on the schools 10 Year Property plan. We recommend that in future, the CMP is updated based on the approved 10YPP.

Refer to Areas for Improvements for matters identified for improvement.

# Focus areas

## Probity of Expenses

### Description of risk

Whilst carrying out our audit, on behalf of the Office of the Controller and Auditor General (“OAG”), we have been asked to consider whether any approved payments could be considered extravagant or wasteful or show a lack of probity or financial prudence. One of the internal control objectives, and key audit risks, relates to Sensitive Expenditure.

### Audit procedures

Our audit approach includes significant focus on testing of the probity of expenditure. We pay particular attention to:

* Sensitive expense categories
* Credit card payments
* Payments to the Principal
* Staff reimbursements
* Expense claims
* Payments to consultants.

### Testing approach

**Dial – Closer to purely substantive**

### Summary of results

We have completed a detailed review of all sensitive expense categories and inspected numerous detailed supporting documentation.

Refer to Areas for Improvements for matters identified for improvement.

# Focus areas

## Management override of controls

### Description of risk

Risk of management override of controls includes how those charged with governance exercise oversight of management’s processes for identifying and responding to risk of fraud and the internal control that management has established to mitigate these risks. Journals, by nature, are higher risk because they can be posted to the general ledger to manipulate the accounting records, potentially to conceal errors, fraudulent behaviour or budget overspends. Many Schools contract out the accounting function to third party service providers, but ultimately it is the Board Members that are responsible for the School’s accounting function.

### Audit approach

Our audit procedures included:

* Obtain a detailed listing of all Journal Entries recorded by the School in the year, whether prepared by the School or an external service provider.
* Testing the list for completeness.
* Reviewing the School’s system of internal controls surrounding the Journal Entry process.
* Special focus is placed on reviewing journal entries posted at the end of the year.
* Detailed testing of any journals that we consider to be large, unusual, non-recurring or outside the School’s normal operations.
* Examining underlying supporting documentation to Journal Entries.

### Testing approach

**Dial – Closer to purely substantive**

### Summary of results

We did not have any audit adjustments arising from our testing of Journal Entries.

We have identified no material deficiencies in the School’s system of internal controls surrounding the Journal Entry process. The School should be aware that Journal Entries can easily be subject to fraud and errors.

# Focus areas

## Fraud Risk in Revenue (Completeness)

### Description of risk

It is the obligation of the Board Members to ensure that management have established appropriate systems of internal controls to ensure the completeness of all income – regardless of source. This means that all funds due to, and paid to, the School are correctly and appropriately banked in the School’s bank accounts and appropriately recorded. We consider that the risk for Schools relates to non-MOE items such as School donations, activity fees (if School did not opt into the Donation Scheme) and fundraising activities.

### Audit procedures

We perform the following procedures:

* Examine the Schools system of internal controls to ensure that all revenue due to the School is appropriately recorded.
* Audit the systems, processes and policies
* Complete Substantive Analytical Review procedures where applicable.
* Testing of reconciliations and other supporting information/documentation maintained by the School.
* Validation of revenue through expense testing.

### Testing approach

**Dial – Closer to purely substantive**

## Summary of results

No audit adjustments were identified as a result of our testing of Locally Raised Funds.

No matters were identified in the course of the audit to report to you.

# Focus areas

## Segregation of Duties

### Description of risk

Segregation of duties in the finance function is a key component of internal control and reduces the inherent risk of fraud. At many Schools, portions of the day-to-day accounting functions are solely under control of one person. This represents an Inherent internal control risk that the Board must address.

## Audit approach

We audit the systems, processes and policies that has been put in place by management. This includes review of:

* Detailed monthly financial reporting to the Board
* Sensitive Expenditure
* Testing of One-level up for approval of expenditure
* Reviewing Delegation of Authority levels in places
* Review and approval of monthly credit card statements
* Approval of Journal Entries.

### Testing approach

**Dial – Closer to purely substantive**

## Summary of results

Refer to the following section on “Helpful Resources” in respect of Segregation of Duties. We recommend that the School completes this Assessment Matrix.

We have no specific matters to report from our testing.

# Summary of adjusted and unadjusted audit differences

## Adjusted audit differences

Banking Staffing $415,599

Impact on Surplus/(Deficit) for the year $415,599

Refer to the Board’s Letter of Representation to the auditors for a summary of the minor Unadjusted Differences.

# Areas of improvement

## Observations

# 2023 Audit – Areas of Improvement

## Observations:

### Matter 1 – Cyclical Maintenance

The Property Occupancy Document (POD) gazetted in accordance with section 70 of the Education Act 1989 requires the Board to prepare and annually review a property plan that includes all the maintenance requirements of the school over a continuous ten year period. The annual review by the Board is also required under accounting standards in addition to the requirement that a reliable estimate be made.

We noted from our review of the Board minutes that the cyclical maintenance provision calculation did not appear to have been reviewed by the Board during the year.

We noted also there for certain painting completed recently, the estimated costs in the calculation were not updated to reflect the actual cost.

#### Recommendations

We strongly recommend that the board annual review the cyclical maintenance schedule and to also ensure that it has been prepared or reviewed by an appropriately qualified person every three years to ensure the basis for the provision is reliable.

Where possible, estimated costs in the provision calculation should be updated to reflect actual amounts per invoices or quotes received, to ensure the calculation is as accurate as possible.

### Matter 2 – Deficit Budget

The board has prepared and approved a deficit budget for the coming year. We are concerned that continued deficit budgeting if achieved will reduce the school’s equity. Although deficit budgeting may appear to be warranted when preparing the budget for a particular year, we urge caution in using the approach as it is unlikely to be sustainable.

#### Recommendations

We are aware that there are sufficient investments to cover the loss, however it is vital that you continue to look for ways to improve actual results against the budgeted deficit in the upcoming school year and ensure that spending does not exceed the amounts approved by the board.

We recommend that the board try to avoid deficit budgeting where possible, so that the school’s budget reflect the ability to operate within its means.

WilliamBuck

# Communication of other matters

## Required communications with management and governance

### Disagreements with management or significant difficulties

There have been no disagreements with management in completing the audit.

### Other communications with management

There have been no other significant discussions with management that have not been reported to you or included in this report.

### Fraud

During the audit we have not identified or been notified by your office of any circumstances of fraud

### Use of other auditors and specialists

William Buck did not require the assistance of another audit firm or specialist in performing the audit of the School.

### Independence

The engagement team and others in the firm as appropriate, the firm and network firms are independent in accordance with relevant ethical requirements and any regulatory requirements that apply to the audit engagement.

### Non-audit fees

We have not charged any non-audit related fees to the School in the period under review. Any other services, which we may provide from time to time, at your request, are distinct from our function as auditors. These additional services can only be provided where they do not impair our independence.

We have implemented policies and procedures designed to deliver high quality services in line with our professional obligations. Our Transparency Report describes our Systems of Quality Management.

### Going concern

During the audit there have been no material uncertainties that may cast significant doubt on the School’s ability to continue as a going concern and require further consideration or disclosure within the financial report.

### Laws and regulations

During the audit there has been no evidence that the School has not complied with laws and regulations pertaining to the School.

## Required communications with management and governance

### Annual Report

The Education and Training Act 2020 requires you to publish your Annual Report on-line. Your Annual Report contains your audited annual financial statements including our audit opinion, analysis of variance, list of Board Members, Kiwisport statement and Good Employer compliance. Making your Annual Report accessible to the School community is important for transparency and accountability. The expectation is that your Annual Report is published as soon as possible after your audit is completed, as the value of good accountability lessens over time.

Please ensure that once your 2023 Annual Report is submitted to the Ministry it is also published on your website. If you do not have a website, contact the Ministry of Education for guidance.

### Related Parties – Conflict of Interest

The risk of conflicts of interest in small communities, which many schools operate in, is inherently high, because the Board, Principal, and other employees are often living in the same communities their school services. There is a particular risk of conflict in the decision-making processes used to appoint new employees and contractors, as well as the purchase of goods and services. However, having a conflict of interest does not necessarily mean you have done anything wrong, what is important is how the conflict is managed.

The Office of the Auditor-General have a good practice guide on managing conflicts of interest as well as other resources, available on its website. We encourage you to make use of these resources.

### Good Employer

Section 597 of the Education and Training Act requires the Board to have an employment policy that complies with the principle of being a good employer. The Board must make the policy available to employees, ensure its compliance with the policy, and report on the extent of that compliance in its annual report.

# Helpful resources

## Resources for management and governance

### Cyclical Maintenance

The Ministry have published the updated cyclical maintenance guidance/tools on its website and the information in the Financial Information for Schools Handbook has also been updated. The updated guidance includes resources to help schools complete their cyclical maintenance provision calculations and provides guidance on what supporting documentation to retain as evidence for a school’s annual audit.

### Fraud Risk

[Discouraging fraud - Office of the Auditor-General New Zealand (oag.parliament.nz)](https://oag.parliament.nz/good-practice/fraud)

### Segregation of duties

The Ministry have also recently published an internal control checklist and a segregation of duties matrix which schools may find useful when assessing the adequacy of their internal controls -

[Managing school finances - internal control resources](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fgovt.us3.list-manage.com%2ftrack%2fclick%3fu%3d2f59fcd18a691d315b5a045cb%26id%3dc08dc97645%26e%3d88a0757f85&c=E,1,v6wnbI8fuV7QL60V0lgYpCsoRD926kS82TuWSy4EdZEQFPLgDtlAha65KIPUYzzz5TVm6n6Y_QowYOS5RdERrf6uG7mBVlONy3wZPmTN4XiP&typo=1)

Further guidance on internal controls can be found in section 7.7.1 of the [Financial Information for Schools Handbook](https://assets.education.govt.nz/public/Financial-Information-for-Schools-Handbook-April-2023.pdf)

Your payroll system is allowing you to view the history activity report. This report should now be used and reviewed in a timely basis for further guidance can be found on the Ministry of Education Website.

### Sensitive Expenditure

More information can be found in the Office of the Auditor-General’s good practice guide on [Controlling sensitive expenditure: Guide for public organisations](https://oag.parliament.nz/2020/sensitive-expenditure) which includes practical guidance on specific types of sensitive expenditure.

Principles-based approach:

[The basics - Office of the Auditor-General New Zealand (oag.parliament.nz)](https://oag.parliament.nz/good-practice/sensitive-expenditure/the-basics)

We recommend the Board consider these principles when making decisions about sensitive expenditure. We highlight to the Board Members the importance of ensuring appropriate controls over Sensitive Expenditure, and to remain up to date with Ministry of Education (“MOE”) guidelines.

# Disclaimer

This report is prepared on the basis of the limitations set out below.

This communication is prepared solely for the information of those charged with governance and is not intended for any other purposes. We accept no responsibility to a third party who uses this communication. The matters raised in this report are only those that came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made.

We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management’s responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our report to identify all weaknesses that may exist in the systems and procedures reviewed, or potential instances of fraud that may exist. Our comments should be read in the context of the scope of our work. Findings within this report may have been prepared on the basis of management representations. Suggestions for improvement should be assessed by the entity for their full commercial impact before they are implemented.

This report has been prepared solely for your use as management of the entity and should not be quoted in whole or in part without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose.