

Ms Joanne Brown Grant Thornton UK LLP 110 Queen Street Glasgow G1 3BX

26 September 2017

Dear Ms Brown

Highland Council

Group Financial Statements for the year ended 31 March 2017

This representation letter is provided in connection with the audit of the group financial statements of Highland Council and its subsidiaries and associates as shown in Appendix 1 of this letter, for the year ended 31 March 2017 for the purpose of expressing an opinion as to whether the group and Council financial statements give a true and fair view in accordance with International Financial Reporting Standards and the CIPFA / LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 and applicable law.

We confirm that to the best of our knowledge and belief having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

Financial Statements

- i We have fulfilled our responsibilities for the preparation of the group and Council financial statements in accordance with proper practices as set out in the CIPFA / LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 ("the Code") which give a true and fair view in accordance therewith.
- ii We have complied with the requirements of all statutory directions affecting the group and Council and these matters have been appropriately reflected and disclosed in the group and Council financial statements.
- iii The Council has complied with all aspects of contractual agreements that could have a material effect on the group and Council financial statements in the event of non-compliance. There has been no non-compliance with requirements of regulatory authorities that could have a material effect on the group and Council financial statements in the event of non-compliance.
- iv We acknowledge our responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.
- v Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable.
- vi We are satisfied that the material judgements used in the preparation of the group and Council financial statements are soundly based, in accordance with the Code and adequately disclosed in the financial statements. There are no other material judgements that need to be disclosed.
- vii Except as disclosed in the financial statements:

- a there are no unrecorded liabilities, actual or contingent
- b none of the assets of the group or Council has been assigned, pledged or mortgaged
- c there are no material prior year charges or credits, nor exceptional or non-recurring items requiring separate disclosure.
- viii We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme assets and liabilities for IAS19 Employee Benefits disclosures are consistent with our knowledge. We confirm that all settlements and curtailments have been identified and properly accounted for. We also confirm that all significant postemployment benefits have been identified and properly accounted for.
- ix Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of the Code.
- x All events subsequent to the date of the group and Council financial statements and for which the Code requires adjustment or disclosure have been adjusted or disclosed.
- xi Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of the Code.
- xii We have considered the adjusted misstatements, and misclassification and disclosures changes schedules included in your Audit Findings Report. The group and Council financial statements have been amended for these misstatements, misclassifications and disclosure changes and are free of material misstatements, including omissions.
- xiii The group and Council financial statements are free of material misstatements, including omissions.
- xiv We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the group and Council financial statements.
- xv We believe that the group and Council's financial statements should be prepared on a going concern basis on the grounds that current and future sources of funding or support will be more than adequate for the group and Council's needs. We believe that no further disclosures relating to the group and Council's ability to continue as a going concern need to be made in the financial statements.
- xvi We have reviewed the accounting for the PFI arrangements and confirm that we are comfortable that these are appropriately reflected in the annual accounts.
- xvii We have reviewed the carrying value of property, plant and equipment and have noted no impairments other than those already reflected in the annual accounts. We confirm that we are comfortable with the carrying value of property, plant and equipment is reasonable.
- xviii We have reviewed exit packages and confirm that these are in accordance with Council policies and all incurred by 31 March 2017 and the financial costs have been recognised in the appropriate year.
- xix We have reviewed the accounting for grant income, and confirm that we are comfortable that all relevant conditions have been met in relation to all amounts recognised as income in the year.

xx We have reviewed the Equal Pay provision and confirm that we are comfortable that this is our best estimate of the provision required.

Information Provided

- xxi We have provided you with:
 - a access to all information of which we are aware that is relevant to the preparation of the group and Council financial statements such as records, documentation and other matters:
 - b additional information that you have requested from us for the purpose of your audit; and
 - c unrestricted access to persons within the group and Council from whom you determined it necessary to obtain audit evidence.
- xxii We have communicated to you all deficiencies in internal control of which management is aware.
- xxiii All transactions have been recorded in the accounting records and are reflected in the group and Council financial statements.
- xxiv We have disclosed to you the results of our assessment of the risk that the group and Council financial statements may be materially misstated as a result of fraud.
- xxv We have disclosed to you all our knowledge of fraud or suspected fraud affecting the group and Council involving:
 - a management;
 - b employees who have significant roles in internal control; or
 - c others where the fraud could have a material effect on the group and Council financial statements.
- xxvi We have disclosed to you all our knowledge of any allegations of fraud, or suspected fraud, affecting the group and Council's financial statements communicated by employees, former employees, regulators or others.
- xxviiWe have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing the group and Council's financial statements.
- xxviii We have disclosed to you the identity of all the group and Council's related parties and all the related party relationships and transactions of which we are aware.
- xxix We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the group and Council financial statements.

Annual Governance Statement

xxx We are satisfied that the Annual Governance Statement (AGS) fairly reflects the Council's risk assurance and governance framework and we confirm that we are not aware of any significant risks that are not disclosed within the AGS.

Narrative Report

xxxi The disclosures within the Management Commentary fairly reflect our understanding of the group and Council's financial and operating performance over the period covered by the group and Council financial statements.

The approval of this letter of representation was minuted by the Council's Audit and Scrutiny Committee at its meeting on 28 September 2017.

Signed on behalf of the Council

Derek Yule

Director of Finance and Section 95 Officer

Appendix 1

List of subsidiary undertakings

High Life Highland

Inverness Common Good Fund

Nairn Common Good Fund

List of associates

Highland and Western Isles Valuation Joint Board

Highlands and Islands Transport Partnership