Background

From June 2016, the requirement to publish an annual transparency report applied to firms that audit any entities falling within the definition of a Public Interest Entity (PIE) in the new EU Audit Regulation/Statutory Audit Directive. This report covers our financial year to 30 September 2019.

Beever and Struthers provides a full range of accountancy and advisory services including accounts preparation, statutory audit, assurance, corporate finance, corporate recovery, taxation, and payroll. The firm has 17 partners operating nationally from four locations in the UK: Manchester; Blackburn, Birmingham, and London.

Legal Structure and ownership

Beever and Struthers is a Partnership. All of our professional services are carried out through one firm.

The firm is owned by the partners, all of whom are members of the Institute of Chartered Accountants in England and Wales ("ICAEW") including two associate members. Our insolvency partner is additionally professionally qualified as a Licensed Insolvency Practitioner.

The Company Books is a "connected entity" of the firm. The Company Books provides bookkeeping and accountancy services to a wide variety of clients, predominantly based in London. Beever and Struthers owns 70% of the share capital, and two of the partners of Beever and Struthers are directors of The Company Books.

International networks

Beever and Struthers is a member of HLB UK, which is in turn a member of HLB International. HLB International is a worldwide organisation of professional accounting firms and business advisers, each of which is a separate and independent legal entity and as such has no liability for the acts and omissions of any other member. HLB International Limited is an English company limited by guarantee which co-ordinates the international activities of the HLB International organisation but provides no professional services to clients. Accordingly, HLB International Limited has no liability for the acts and omissions of any member of the HLB International organisation, and vice versa.

Governance Structure

The Firm is owned by the partners, with voting rights assigned via the Partnership Agreement. The control and management of the Partnership remains in the hands of the partners. All partners attend quarterly meetings at which financial performance and management are discussed and all participate in the decision-making process regarding the running of the Firm.

Maria Hallows and Caroline Monk are Executive Partners of the Firm.

Matters relating to the operational management of the Partnership's business are undertaken by the Operations Board which meets every month. A formal risk management process is in place which is monitored by the Partnership and discussed by the Operations Board on a quarterly basis together with various matters relating to the implementation of the Partners' strategy.

The Operations Board currently comprises both Executive Partners, Human Resources Director, Marketing and Business Development Director, Head of Practice Compliance, Practice Manager and the IT Manager.

Internal Quality Control System

• Leadership responsibilities for quality within the Firm

Sue Hutchinson, the Audit Compliance Partner, is responsible for ensuring that the Firm establishes and maintains suitable quality control policies and processes, including the maintenance of an appropriate documented structure within the Firm.

Sue is responsible for the development, documentation, and communication of these matters within the Firm. It is also her responsibility to ensure that the quality of audit engagements conducted by the Firm is never compromised by commercial considerations.

Sue is also responsible for ensuring that the Firm has complied, and will continue to comply, with Audit Regulations and is the first point of contact with the ICAEW from a compliance perspective.

The Audit Compliance Partner ensures that the Firm's Audit Policies and Procedures are kept up to date and that all staff are familiar with its content including any updates that are made.

• Ethical requirements

Sue Hutchinson is the Firm's Ethics Partner, responsible for ensuring that the Firm has complied, and will continue to comply, with the Ethical Standards issued by the FRC.

Ongoing ethical issues, including the provision of non-audit services to audit clients, are considered prior to the commencement of each individual audit assignment and by reference to the Ethics Partner if required. Where we do not consider that the appropriate safeguards can be put in place, the assignment is declined. Ethics training is provided on a regular basis to ensure that all partners and staff are aware of the requirements.

The detailed responsibilities of the Ethics Partner are set out in the Firm's Audit Policy document.

Acceptance and continuance of client relationships and specific engagements

All new client appointments are subject to completion of the following: Client Identification Form and related due diligence documentation as required under the Anti-Money Laundering Regulations; Client Acceptance and Risk Questionnaire; and Conflict of Interest checks.

Before accepting an appointment or re-appointment, the Responsible Individual must complete a checklist to justify the decision. This is completed to assess the client and the risks (if any) of acting for the client or providing the services requested.

When there is any doubt, acceptance of the client will be discussed with the Ethics Partner, Sue Hutchinson, and our Money Laundering Reporting Officer (MLRO), Suzanne Lomax, Partner.

The Firm is committed to providing the highest standards of client care and service. We therefore ensure that, before accepting an assignment, the relevant partners and staff have the appropriate skills and knowledge to undertake the assignment including consideration of any sector specific training that may be required in order to complete the assignment to the highest possible standard.

• Human resources

Human resource matters are the responsibility of the HR Director, Jo Rigby. Jo is responsible for the development and maintenance of our HR procedures covering quality of staff, recruitment, grievances, and appraisals. Staff remuneration is reviewed and agreed by all of the partners.

Richard Williams, Partner, is the qualified person responsible for training, ensuring that the firm provides a structured programme for all of our accountancy trainees on the various training programmes that we offer.

We are committed to ensuring that all our staff maintain up to date relevant training in order to deliver assignments of the highest possible quality. All professional staff and partners who are not studying for examinations undertake Continuing Professional Development ("CPD"). Specific training requirements are considered via the appraisal process and all staff are required to commit to undertake training for the relevant areas. Relevant staff (including those with Responsible Individual status for audits) maintain CPD records and review and update these regularly following completion of various training courses throughout the year including any sector specific training that may be required.

Engagement performance

All of the Firm's audit manuals and programmes are provided by CCH using the Pro Audit software and all of the audits undertaken by the Firm follow the procedures set out by CCH. The audit planning process ensures that the programmes are tailored to the specific requirements of the assignment and that the audit is properly focused.

All audits are subject to both Audit Manager and Responsible Individual review with feedback given to staff on areas where they have performed well and areas where improvements could be achieved, thus ensuring the continued development of our staff.

The Firm also ensures that audit files are maintained to a high standard through regular training. Audit and accounting update courses are provided to all relevant staff across all three offices twice a year using an external training provider in addition to various internal training sessions that we run throughout the year.

We use an external cold file reviewer to select a sample of audit files for review on an annual basis, ensuring that each Responsible Individual is included at least once every three years for review. The results are sent to Sue Hutchinson, the Audit Compliance Partner, and explanations of any matters identified are sought where this is appropriate. Development points arising from these reviews are formally monitored using a rolling action plan and appropriate action is taken, for example, running additional internal training sessions if appropriate.

We undertake an annual practice assurance compliance review and whole firm compliance review. Any matters identified are dealt with as appropriate and a rolling action plan is maintained in order to monitor progress against issues raised. This is discussed at the Operations Board meeting as part of on-going monitoring and assessment of the internal quality control system. The Operations Board is satisfied that the internal quality control system is operating effectively.

Monitoring visits

The Firm is subject to regular monitoring visits by the Quality Assurance Directorate (QAD) of the ICAEW. The last audit visit took place in April 2018 and the last practice assurance visit took place in April 2019. As at 30 September 2019 the Firm had eight clients that fell within the remit of inspection by the Audit Quality Review Team (AQRT). A review by the AQRT took place from January 2019, with a report being issued in July 2019.

In addition, the Firm is also subject to monitoring visits in respect of its licensed insolvency work by the QAD. The last visit took place in 2017.

BEEVER AND STRUTHERS

Transparency Statement

Public Interest Entities

During the year ended 30 September 2019 the firm acted as auditor to the following clients which fall within the definition of a Public Interest Entity (PIE) as defined by the FRC following the implementation of the EU Audit Directive in June 2016.

- B3 Living
- Clwyd Alyn Housing Association (formerly Pennaf Limited)
- Citizen Housing Group Limited (formerly WM Housing Group Limited)
- Karbon Homes Limited
- Lincolnshire Housing Partnership (formerly Boston Mayflower Limited).
- Longhurst Group Limited
- Methodist Chapel Aid Limited
- Monarch Assurance SE (formerly Monarch Assurance plc)
- Thrive Homes plc

Independence procedures

All partners and staff are required to complete annual declarations of Fit, Proper, Confidentiality and Independence which are reviewed by Sue Hutchinson, the Audit Compliance Partner. The forms are also completed during the year for any person joining the firm. A confidential database is maintained and updated annually noting any exceptions identified as part of this process together with the appropriate safeguards that have been put in place. The database is reviewed at least annually by Sue Hutchinson.

A conflict of interest check is distributed by email to all staff prior to accepting any engagement and responses are monitored by the relevant team. Any exceptions noted as part of this review are notified to Sue Hutchinson and the database is updated accordingly.

Sue Hutchinson is notified of any matters which may have an effect on independence, or of any actual or potential conflicts of interest as these arise throughout the year. If any are identified appropriate action is taken.

As part of our audit planning process, prior to the commencement of each audit, we review our independence which includes consideration of whether any non-audit services provided by the Firm to audit clients may impact on our actual or perceived independence. This review is updated again, before issuing our opinion.

Our Audit Policies and Procedures document sets out certain criteria where an engagement quality control review is required. This includes all PIE audits and consideration is also given to review requirements for employee Responsible Individuals.

As part of our annual internal compliance procedures we confirm that an internal review of independence practices has been conducted.

Financial Information

The following table summarises the revenue for the firm for the year to 30 September 2019 and the preceding financial year.

	2019	2018
Analysis of revenue for the year ended 30 September	£m	£m
Revenue from statutory audit work	5,346	4.887
Revenue from non-audit services provided to audit clients	1,032	1.083
Revenue from non-audit services provided to non-audit clients	5,149	4.828
Total revenue	11,527	10.798



Non-audit services provided to audit clients include the preparation of financial statements, corporation tax compliance, payroll services, corporate finance services, general tax advice and VAT advisory work. The provision of any non-audit services to audit clients is subject to the review highlighted above.

Basis of remuneration of partners

The allocation of profit to each partner is established with reference to the Partnership Agreement. Audit partners are not remunerated by reference to the sale of non-audit services to audit clients, thereby assisting in maintaining the independence of the audit function where non-audit services are provided.

This report covers our financial year to 30 September 2019.

Beever and Struthers provides a full range of accountancy and advisory services including accounts preparation, statutory audit, assurance, corporate finance, corporate recovery, taxation and payroll.

Beever and Strukery

Beever and Struthers Chartered Accountants and Business Advisors

<u>Transparency Statement 2018</u> <u>Transparency Statement 2017</u> (Updated version of the 30 September 2017 Transparency Statement) Transparency Statement 2017 Transparency Statement 2016