# Blind and Low Vision Network NZ

## Audit Closing Report to the Members of the Board

Year ended 31 December 2024

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## 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 2024. 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 2024

## 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

* Management override of controls
* Cyclical Maintenance
* Fraud Risk in Revenue
* Probity of expenses

## Areas of improvement

* Fixed Assets Counts
* GST inputs not claimed for travel expenses
* High Annual leave

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.

Nāku noa, nā

Bonita Swanepoel

Partner

15/5/2025

# 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

Management override of controls. Risk – Significant. Management judgement – yes.

Cyclical maintenance provision. Risk – Higher. Management judgement – yes.

Fraud risk in revenue. Risk – Higher.

Probity of expenses. Risk – Higher. Management judgement – yes. Area of improvement – yes.

### 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.

# 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.
* Focus on year-end journal entries.
* Test large, unusual, or non-recurring journal entries.
* Examine supporting documentation for Journal Entries.

### Testing approach

**Dial – Closer to purely substantive vs purely control**

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

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

### Summary of results

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

# 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 vs purely control**

### Summary of results

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.

The CMP is based on recent quotes received from a painter.

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

Based on our testing we did not note any material error in the CMP at 31 December 2024.

# Focus areas

## Fraud Risk in Revenue

### 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 approach

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 vs purely control**

## 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

## 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 approach

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 vs purely control**

### Summary of results

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

We did not have any audit adjustments arising from our testing of sensitive expenditure.

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

Refer to Areas for Improvements for matters identified for improvement.

# Summary of adjusted and unadjusted audit differences

## Adjusted audit differences

Receivables Credit $127,000

Receivables from Ministry of Education Debit $127,000

MOE receivable to reclassify to MOE receivables.

# Areas of improvement

## Observations:

### Matter 1 – Fixed Assets Count (library stock)

As of the library book stock count dated 31 December 2024, the total value does not align with the balance recorded in the FAR. Additionally, the FAR reflects the library books as a single consolidated line item, whereas the stock count sheet lists them individually by title or item.

#### Recommendations

The register should be used to periodically check the existence of all fixed assets recorded by the school, through a fixed asset count. We recommend that you do this at least annually for valuable and mobile items and perhaps on a rotation basis for other items.

It is important that all assets purchased and disposed of during the year are recorded in the fixed assets register immediately when in use / no longer in use.

### Matter 2 – GST inputs not claimed for expenses

Our sample testing of expenditures showed that GST appeared to have been incorrectly included into the cost of some expenses.

#### Recommendations

We recommend that the school ensure the cost is accurately recorded under the correct expense account code and that the GST portion is separated to enable the appropriate amount to be claimed.

### Matter 3 – High Annual Leave

We noted that there are some situations where the level of accrued annual leave was high.

We appreciate that it can be difficult to faciliate annual leave; however high annual leave balances have several implications as follows:

* It places a significant burden on the school’s liabilities;
* When leave is taken or paid out, the rate of pay is the current one at the time the leave is taken or paid, not the time at which it was accrued. This becomes an extra up-front cost for the school;
* Not taking a break from work for a lengthy period, may have adverse effects on the employees’ well-being and, consequently, their productivity. In serious cases, a potential claim for stress could follow later on; and
* Not taking annual leave is one of the characteristics of fraud or trying to conceal something. We wish to point out that nothing in our audit has led us in any way to question the integrity of these or any other employees, nor have we identified or been notified of any circumstances of fraud resulting from high annual leave.

#### Recommendations

We would recommend that this situation be reviewed in order to reduce these levels of annual leave accrual, by agreed reduction through annual leave taken (we suggest having forced leave with a minimum of two weeks per year to reduce the levels). It is also important to have someone else on your team able to perform the tasks of these people and doing so regularly, particularly when the person takes leave.

# 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 2024 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.

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.