

Government and Public Sector

International Financial Reporting Standards

What is IFRS?

Your questions answered





Foreword

IFRS is here for government and public sector accounting.

The Chancellor's 2008 Budget announced that the annual financial statements of government departments and other entities in the public sector will be prepared using International Financial Reporting Standards (IFRS). Following a revision to the implementation timetable, these standards will be adapted as necessary for the public sector and will be used from 2009/10. Consequently, 2008/9 comparative numbers will need to be restated to IFRS, and so the transitional countdown to IFRS has already started.

Central government, NHS Trusts, Primary Care Trusts and NHS Foundation Trusts will all need to adopt IFRS within the same timetable. Local authorities will begin reporting on an IFRS basis in the following year 2010/11.

Listed entities in the private sector made the change to IFRS in 2005, and PricewaterhouseCoopers assisted a large number of organisations to make the transition. We have used our learning to prepare this guide on the key aspects of IFRS. It is aimed at anyone involved with financial reporting for government and the public sector – staff, management, non-executives, and key stakeholders. We answer a range of commonly asked questions, from the most basic - 'What is IFRS?' - to the practical implications of converting to IFRS.

Our experience is that IFRS presents more than a technical accounting issue for the finance team.

Many areas of each organisation will feel the impact of IFRS. These areas might include the setting and measurement of performance targets, budgeting and forecasting - as well as financial reporting. All organisations need to be ready for these changes and the impact which they could have.

Asking the right questions about IFRS now will help you to be better prepared for the transition. You will be in a better position to proactively take advantage of the opportunities presented by conversion to IFRS, rather than simply reacting to change.

Your questions

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Our answers – the context for IFRS

What are IASs and IFRSs?

IFRSs are International Financial Reporting Standards, and are accounting standards issued by the International Accounting Standards Board (IASB).

The first standard issued by the IASB was IFRS 1, 'First-time adoption', which was issued in 2003; the most recent standard to be issued was IFRS 8 'Segment Reporting'. Standards issued by the IASB's predecessor, the International Accounting Standards Committee (IASC), are known as IASs, International Accounting Standards. Thirty-two IASs are still in force, having been adopted by the IASB.

More broadly, the term IFRS refers to the international equivalent to UK GAAP, the set of Generally Accepted Accounting Principles that includes accounting standards, Interpretations (equivalent to Urgent Issues Task Force - UITF abstracts)), the IASB's Framework and established accounting practice.

Is there a need for a single set of international standards?

It has long been recognised in the corporate sector that there is demand for a single international set of accounting standards. As both business and the financial markets become more global, one financial language aids the preparation, comparability and analysis of financial information for corporate entities.

Some of the benefits for the corporate sector have been seen in merger and acquisition activity where comparable information across different countries has enhanced ease of analysis for acquirers; in raising finance; in communications where one accounting language has enabled companies to produce marketing material and communications that are understood globally by shareholders, analysts and other users.

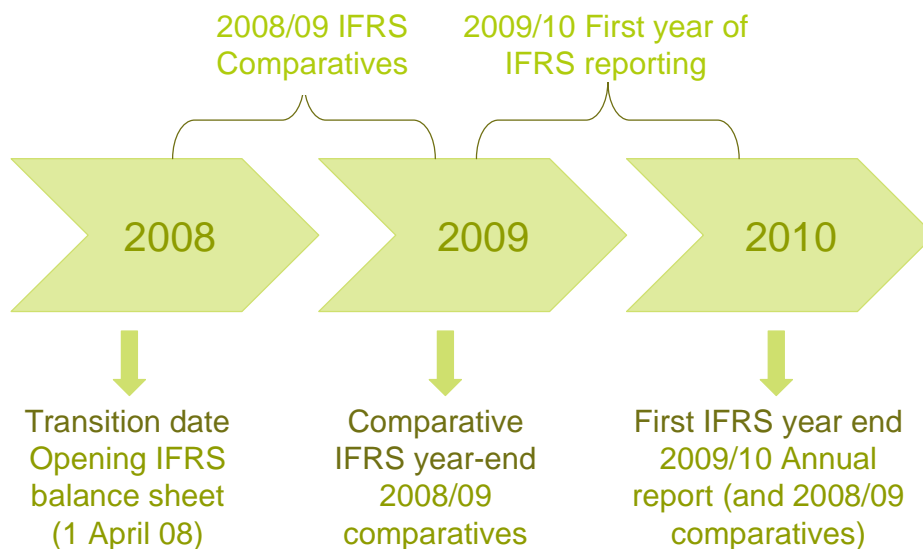
Why has IFRS been adopted for government and public sector accounting?

The Chancellor's 2008 Budget announcement delayed IFRS-based financial reporting for government and public sector accounting to 2009/10. The reasons for introducing IFRS were set in the context of the government's need for "high value performance data in combination with appropriate financial data". IFRS as adapted for use in the public sector will be used to provide "benefits in consistency and comparability between financial reports in the global economy and to follow private sector best practice".

In practice this means that annual accounts for government organisations and the NHS will need to be prepared using IFRS, a new set of financial rules and concepts, for the year ending 31 March 2010.

In addition, comparative financial information for 2008/09 will need to be restated along with opening balances at 1 April 2008. Local authorities are following a different timetable, and will implement IFRS from 2010/11.

The transition date for IFRS is 1 April 2008



Isn't IFRS already in place for listed companies?

Yes. In 2002 the European Council approved a Regulation on the introduction of IFRS into the EU for financial years beginning on or after 1 January 2005 for the consolidated financial statements of all listed groups. Because this was a Regulation rather than a Directive it passed immediately and directly into national law and did not have to be approved by Member States of the EU. The Regulation is, therefore, now part of UK law. This applies to IFRS as adopted by the EU, which may not necessarily be the same as the IFRSs issued by the IASB.

How will IFRS be applied to government?

Financial reporting in government is determined by the requirements of the FReM (Financial Reporting Manual), which was based on UK GAAP as adapted for the public sector. HM Treasury began working on an IFRS-based FReM ('the i-FReM') in May 2006, through a process of considering each part of IFRS individually and then, where appropriate, interpreting or adapting this for the public sector. This was then compared to the existing requirements of the FReM and to IPSAS (see page 5) as part of an impact assessment. The draft i-FReM was issued in June 2007 for consultation and was finalised in January 2008.

Non-departmental public bodies (NDPBs) that are incorporated as companies, or that have charitable status will, as now, be required to comply with the Companies Act or regulations issued under charities legislation. If they have charitable status they will also need to apply the Statement of Recommended Practice (SORP) Accounting by Charities issued by the Charity Commission. If they are both registered companies and charities they will need to apply both the Companies Act and the SORP. They should also follow the principles in the i-FReM where these go beyond the Companies Act or the SORP.

Note that the i-FReM is based on IFRS as adopted by the EU, not IFRSs issued by the IASB.



And what about the NHS?

With the exception of NHS foundation trusts, NHS organisations follow the NHS Manual for Accounts issued by the Department of Health. This is being updated to follow the requirements of the government i-FReM and is likely to depart from its current format of directed accounting policies. The new principles-based Manual for Accounts may therefore be less prescriptive than its predecessor.

NHS Foundation Trusts have their own financial reporting regulations set out in the FT FReM issued by the foundation trust regulator, Monitor. This document has been updated by PricewaterhouseCoopers on behalf of Monitor. While some interpretation of accounting requirements will be needed for the Foundation Trust sector, the expectation is that the Monitor i-FReM will be very much in line with the i-FReM issued by HM Treasury.

Will IFRS affect local government?

Yes. Local authorities will move to accounting on an IFRS basis by 2010/11, a year after central government and the NHS. CIPFA is currently consulting on the future governance arrangements for the accounting guidance for the sector. The Code of Practice on Local Authority Accounting is developed by CIPFA/LASAAC, and provides the main guidance on accounting in local authorities. In order to give certainty over the transition of this Code to IFRS, it is proposed that in future it is linked to the Financial Reporting Advisory Board rather than to the Accounting Standards Board (as at present).

What about charities, housing and education?

Other not-for-profit entities, including registered charities, registered social landlords, and higher and further education institutions must follow their own SORPs under UK GAAP. As these SORPs are approved by the ASB, these sectors are tied into the ASB's convergence agenda.

Our answers – Who decides what IFRS looks like

Who produces IFRS?

The International Accounting Standards Committee (IASC) was formed in 1973 as a part-time committee, which nevertheless produced a large body of work.

However, it was recognised that the structure of the international standard setting body needed to be strengthened if a globally acceptable high quality set of standards was to be produced. The IASC set up a Strategy Working Party in 1997, which recommended the current IASB structure.

The fourteen-member IASB is professional and largely full-time and has been drawn from a range of constituencies: there are five auditors; three preparers; three users; one academic and two others. Its Chairman is Sir David Tweedie who was the chairman of the UK ASB.

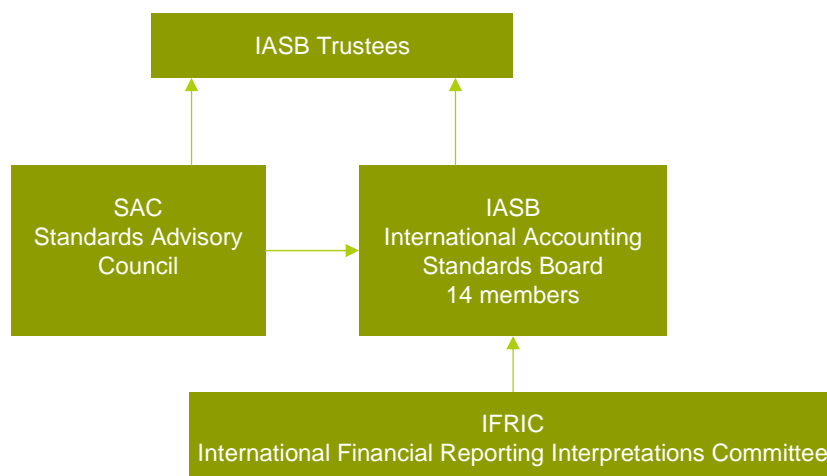
One of the IASB's objectives is: "to bring about convergence of national accounting standards and International Accounting Standards to high quality solutions". In order to help achieve this, the Board has fostered close contact with national standard setters.

The IASB is supported and advised by the Standards Advisory Council (SAC). The SAC currently has 48 members, drawn from a wide geographical and professional constituency. Its objectives are:

- giving advice to the IASB on agenda decisions and priorities in the Board's work;
- informing the IASB of the views of the organisations and individuals on the Council on major standard-setting projects;
- giving other advice to the IASB or the Trustees.

The International Financial Reporting Issues Committee (IFRIC) has a role equivalent to that of the UK's UITF. It was established at the same time as the IASB, replacing its predecessor, the Standing Interpretations Committee.

The activities of the Board, the SAC and the IFRIC are overseen by the IASB Trustees.





Doesn't the public sector already have its own international accounting standards?

Yes it does. International Public Sector Accounting Standards (IPSAS) are issued by the IPSASB, a board of the International Federation of Accountants. These standards are designed to apply to the general purpose financial statements of all public sector entities.

Many IPSASs are based on IFRS, but not all. HM Treasury has taken into consideration the content of IPSAS but has not based the i-FReM on this set of standards, instead selecting to follow IFRS. It is therefore not expected that any entities in the UK will be reporting under IPSAS.

Is IFRS as good as UK GAAP?

IFRS has improved considerably since it began with a part-time standard setting body that was sometimes forced into compromise by competing political pressures (which resulted in the number of allowed alternative treatments in existing IAS).

The IASB is working towards eliminating these choices to enhance the consistency of accounting treatments between entities and towards improving the level of interpretation and reasoning in the standards.

IFRS is based on a similar conceptual framework to UK accounting standards and, although it does not have the equivalent of FRS 5, 'Reporting the substance of transactions', it does tend to adopt a similar substance-based approach.

Why is IFRS endorsed by the EU?

The European Union has an endorsement mechanism for the adoption of IFRSs in the EU. It is only these IFRSs as adopted by the EU that will be applied in the i-FReM (and to companies subject to the EU Regulation). The Accounting Regulation Committee (ARC) has representation from each of the European Union member states. It has one month to make a majority decision on the application of each IFRS in the EU, that is, to adopt or reject a standard.

The ARC is advised at the technical level by the private-sector European Financial Reporting Advisory Group (EFRAG), appointed by a supervisory board and consisting of eight to ten European 'accounting experts'. It acts as a technical liaison between the IASB and the Commission, 'vetting' the standards before adoption in Europe.

Defining a common European position on standards as they are being developed is a crucial part of EFRAG's responsibilities, as is active participation in the IASB's due process, commenting on both standards and interpretations. It is not intended that the endorsement mechanism will be used to veto individual IFRSs, and to thereby create European IFRS. Rather it will be used as part of the process by which the EU seeks to influence the debate on international standard setting. Although it does not have any direct say in standard setting, this process should help to ensure that the European voice is heard.

IFRS introduces some significant changes in the way items are accounted for

Is European IFRS different from that used in the rest of the world?

The endorsement mechanism has the power to 'not adopt' an IFRS for use in Europe but the EU has stated that "*the likelihood that an IAS or an Interpretation will be considered unsuitable for application within the EU is very low*".

In practice this has meant that IFRS as adopted by the EU is identical to that issued by the IASB with the exception of IAS 39. In November 2004, the EC adopted a 'carved-out' version of IAS 39, which deleted a limited number of words and paragraphs relating to the use of the 'fair value option' for financial liabilities and certain aspects of hedge accounting. In November 2005, the EC adopted the IASB's amendments to IAS 39 published in June 2005 ('the fair value option'). The hedge accounting carve-out remains.

The other areas where differences remain are down to timing, where the IASB has issued standards and IFRICs, but the EU has yet to get round to adopting these.

Note that government organisations in a number of European countries have adopted IPSAS rather than IFRS.

How is the ASB responding to IFRS in the UK?

As stated in the ASB's convergence strategy paper, which was discussed at the ASB Public Meeting on 19 January 2006, the ASB now proposes that it should not continue to follow the phased convergence approach which it had initially been following. The ASB proposes to issue new IFRS-based UK accounting standards, but these will not be mandatory before a single date, which is currently estimated to be financial years beginning on or after 1 January 2009, although this timetable may slip.

PricewaterhouseCoopers believes that the way forward in the UK is to replace UK GAAP with IFRS and to push this down to all sizes of entity. We do, however, also support the need for simpler versions of IFRS for smaller organisations, such as the draft proposals for an International Financial Reporting Standard for small and medium-sized entities (IFRS for SME). This convergence agenda is unlikely to significantly affect government organisations and the NHS, but may have a greater impact on registered charities, registered social landlords and further and higher education institutions.

Is IFRS really very different to UK GAAP?

IFRS does have the same 'principles' basis as UK GAAP, but there are still significant differences of which those with greatest relevance to public sector bodies are noted opposite:



Topic area	Implications under IFRS
PFI	Potentially moving schemes on balance sheet using principles of "control" rather than "risk" and "reward"
Leases	Need to separately account for leases of land and buildings Land leases are normally operating leases Experience showed that the detailed review of leases between operating and finance leases is time-consuming Other contracts with lease-type features need to be identified
Segment reporting	Segments must correspond with internal reporting Reconciliation to reported financial information
Financial instruments*	Very complicated standards Covers a large part of the balance sheet New and extensive disclosures Separate accounting for derivatives (and embedded derivatives)
Increased disclosures	IFRS requires increased disclosures in the financial statements, driving up the length of financial statements and the amount of time it takes to collect the supporting data.

**Note that IFRS is identical to UK GAAP on the financial instruments standards, but HM Treasury delayed adoption of these standards (FRS 25, FRS 26 and FRS 29) in the FReM. Local authorities have already adopted the three UK GAAP standards on financial instruments.*

These, of course, are just some of the significant differences between IFRS and UK GAAP.

Our answers – the practical aspects of IFRS

Will it cost me to use IFRS?

Our experience from conversion to IFRS in the listed sector has shown that there are initial costs as organisations move from one set of accounting principles to another. Experience from the listed sector shows that early planning and an effective conversion project structure saved costs in the long run. There may also be higher ongoing costs in some areas where the IFRS requirements for information collection, monitoring and disclosure are more rigorous, such as segment reporting.

How do I go about identifying the differences that apply to my organisation?

We strongly recommend that organisations start thinking about the differences now. The accounting preparation part of the conversion process should follow a rigorous methodology that includes the following steps:

Listing the differences between your current policies and IFRS

One practical way an organisation might go about identifying the differences is to go through the categories and sub-categories contained in its income and expenditure account and balance sheet line by line. It should identify the current measurement and presentation policies, along with associated disclosures, and then map this to the requirements of the appropriate IFRS.

Summarising and classifying these differences

This should be done according to the nature of the accounting policy changes:

- changes of policy that cannot be avoided due to a conflict between current policies and IFRS;
- optional change of policy – this is where existing policies comply with IFRS, but others would be allowed as well. For example, when IFRS allows two treatments and one of them is your current accounting policy.

Defining new accounting policies following a rigorous documented process

Identify any application difficulties, the choice and methods of application and any new information that needs to be collected.

Prepare a summary of all the issues and their proposed solutions

Document the final policy in detail.

Amalgamating the new rules and accounting information

This should:

- include the new policies adopted but still mention the old policies and detail the changes that are required;

- provide details of the accounting process to ensure consistent presentation of financial statements and facilitate consolidation (if applicable).

Is conversion purely an accounting issue?

No it is not. Accounting is certainly a large part of conversion and the scale of any conversion project will depend on the nature of an organisation and its existing accounting policies. Our experience of IFRS conversions with the listed sector showed that for many entities the change affected many of the items on the balance sheet, financial indicators and performance measures as well as internal and external relationships and strategy.

To succeed, the change must be embedded across all functions, involving people at all levels, including subsidiaries. Departments such as finance, internal audit, IT and human resources will all have key roles to play. And depending on internal resources, auditors and consultants may also be involved.

IFRS adoption will require a full project management process to enable good management of the transition period and ensure that the organisation is operationally ready. The whole entity will need to be aware of the project and what it involves so it is crucial that the project is launched well in advance of the planned publication of IFRS financial statements in 2009.



Can I adopt early?

No. Government organisations and NHS bodies are required to follow the existing Financial Reporting Manuals and Manuals for Accounts (subject to annual updates). These do not allow for early adoption of IFRS.

Despite this, however, the date at which IFRS information will be required is earlier than many imagine. For government organisations and the NHS, March 2009 year-ends with one year's comparatives will require an opening IFRS balance sheet at 1 April 2008. In addition, it is possible that HM Treasury may require more than one year's comparative data to be restated under IFRS.

How long will the conversion process take?

Planning for the introduction of IFRS can and should start now. Conversion is likely to be a complex process, affecting much more than the financial statements, and this is borne out through conversion experience in other sectors.

The message is that government and NHS organisations need to be thinking about this now, if they have not done so already.

At the very least, finance staff should be ready to be quizzed on the financial implications of IFRS adoption and what impact they expect it to have on their organisation.

Preparing early will allow for implementation of a proper change management methodology and a suitable project structure. It will also help the transition to go smoothly with time to raise awareness of the differences between IFRS and UK GAAP, time to run simulations of the financial impact of IFRS before going live and time to prepare stakeholders for any potential changes in performance trends. Early preparers will also be able to make the best use of their available resources (both internal and external) by spreading the work.

How will I adopt IFRS for the first time?

IFRS 1, 'First-time adoption of International Financial Reporting Standards', sets out how financial statements should be prepared when adopting IFRS for the first time. This standard requires that organisations should prepare an opening IFRS balance sheet at the date of transition to IFRS. The date of transition is defined as the beginning of the earliest comparative period presented in an entity's first IFRS financial statements.

The general principle is one of retrospective application, that is, the accounting policies required by IFRS that are effective at the reporting date for the first IFRS financial statements are to be applied to the opening balance sheet and all periods presented. The standard includes a very limited number of exemptions from full retrospective adoption.

If the reporting date is 31 March 2009 and the organisation presents one year of comparatives then the starting point is the preparation of an opening balance sheet at the date of transition (that is, 1 April 2008). HM Treasury has still to confirm whether it will propose any interpretation of IFRS 1 for the public sector context.

How should I tackle IFRS conversion?

IFRS adoption requires a rigorous methodology to ensure its strategic success.

The key milestones will include:

- implementing a suitable project structure with the different levels of the project and everyone's roles clearly defined;
- winning the involvement of all parties and convincing them of the strategic importance of the project for the organisation as a whole;
- tackling accounting policies to ensure that they comply with IFRS;
- planning the best possible use of human resources and finding new resources where necessary;
- defining and implementing a training plan for each category of participants affected by the project;
- adjusting information systems to meet the organisation's new needs and guarantee the best cost/benefit ratio of the change by providing broader, more consistent and reliable information;

IFRS means different data requirements and sometimes new processes

- simulating IFRS financial statements before going live, to work out the best ways of communicating potential changes in performance trends;
 - preparing the first financial statements in full compliance with IFRS, making sure that stakeholders understand the differences and there are no last minute surprises.
- The impact of IFRS will also need to be considered when making strategic decisions during the transition period.
- assessment of how well resources match skill requirements, which will provide the starting point for a training action plan;
 - outline training solutions for staff (for example, training courses, e-learning) and decide who will carry out the training (for example, advisors, external consultants and/or employees);
 - prepare a timetable for the training events.

Are staff likely to require additional training?

Yes they are. You should be aware that the conversion to IFRS can affect a large number of people within the organisation and not just the finance department. According to companies that have already converted, the time and effort required to implement appropriate training should not be underestimated.

The first step will be to design an appropriate training programme. Actions will include:

- assessment of the skills required by the different participants in the project – management, finance, communications and training people will all have different needs;
- assessment of existing IFRS knowledge in the organisation;

The second step will be to develop a training action plan, but this will be different for each organisation. Training needs will also vary according to the stage the IFRS conversion project has reached.

Different groups of people are likely to require separate training content. So while top management will need to understand the reasons for conversion and what's at stake, the audit committee will need to be familiar with the key issues and impacts of the change on the organisation.

At the same time the project team might need to understand which issues will require involvement from senior management. Operational staff, including finance staff, will require more detailed accounting training.

Certain members of the finance department will need to develop specialist knowledge in the most complex IFRS subjects and everyone involved in the dissemination of financial information will also need training in the new processes and tools, such as the accounting manual.

Will I also need to change my systems?

One of the key lessons learnt from the implementation of IFRS in other sectors is that it is never too early to start planning for conversion. Proper emphasis on accurate and relevant management information is vital for fully informed decision making and the effective running of an organisation. IFRS will provide a fresh opportunity to review the systems and the data produced.

The impact of IFRS on information systems will vary from one organisation to the next, depending on their existing system. But generally conversion to IFRS will at least require a rethink of the parts of the system that deliver financial information. Organisations should consider their overall financial reporting systems and not simply the main accounting package.

For some, IFRS conversion may also be the appropriate moment to move internal and external reporting onto the same basis, which could require some fundamental systems changes.

Each organisation will have to define the unavoidable systems changes through detailed analysis of the accounting differences between IFRS and the GAAP currently used.

At the very least adoption of IFRS is likely to require:



- changes to the chart of accounts;
- modifications to the accounting systems of each consolidated entity to meet IFRS information needs;
- an analysis of all systems and possible adaptations to the new information needs;
- reorganisation of information flows to the centre to ensure timely receipt of data for consolidation and presentation of the new information.

Aligning internal and external reporting to provide the required information for IFRS can be one of the most challenging parts of the conversion process, according to organisations that have already converted. These changes also need to be incorporated into the planning and budgeting phases.

This kind of alignment should improve the reliability and timeliness of information for management and stakeholders alike. It will also improve performance analysis and help to avoid surprises that could arise from having separate systems.

Will IFRS affect key performance indicators?

Each organisation will need to prepare a precise inventory of the differences between their existing accounting policies and IFRS to properly assess the impact on their key financial and performance indicators.

A PricewaterhouseCoopers survey carried out in 2006¹ showed that one in three respondents (37 per cent) found differences on reported results because of IFRS were in the expected areas, but that there were also some surprising changes.

Performance indicators which may be affected by the transition to IFRS include:

- departmental expenditure limits
- break-even duty
- prudential borrowing code
- covenants
- interest cover
- operational costs
- return on capital employed
- out-turn against budget.

This is one of the key areas of conversion. Entities should be aware that it is not just about implementing new standards: conversion also encompasses effective and timely communication of the effects to stakeholders and funders.

How should communications with stakeholders be managed?

IFRS could change the appearance of financial statements significantly, so it is essential for the organisation to prepare stakeholders and funders a long time before publication.

It will be particularly important in the first year of IFRS adoption to ensure that the annual report is an effective communication tool. Its structure and contents may need to be re-examined and this would also be an opportunity to integrate new information on non-financial indicators into the annual report, which will help companies to meet market expectations.

What should I do next?

We believe that the move towards IFRS is a good thing. However, the transition will not always be easy for organisations. Larger entities have the greater resources available, but they also are likely to have the most complex and difficult transactions.

There are many areas to consider and assessing the implications of 40 new standards is only one of them. Government organisations and the NHS should begin to develop their plans as soon as possible.

¹ IFRS Embracing the Change – a PricewaterhouseCoopers/Ipsos MORI survey of FTSE350 Senior Finance Executives July 2006

How PricewaterhouseCoopers can help

PricewaterhouseCoopers offers a comprehensive suite of services to assist entities in understanding and implementing IFRS. We are able to share with you the lessons learned from our work with many private sector organisations as they went through the transition process.

Insights based on PwC's IFRS experience

You too can share PwC's IFRS experience through registering at our free website Access IFRS at ifrs.co.uk. This will also entitle you to receive 'Inside IFRS', PwC's regular e-newsletter on IFRS for government and the public sector.

Impact analysis

PwC can provide assistance in understanding the impact of IFRS on your organisation. We can undertake a full impact assessment, providing you with additional resource, or review the completeness and robustness of any assessment which has already been undertaken.

We have an established impact assessment methodology, the outputs of which can be tailored to your needs. We will usually provide you with a written report which analyses the potential impact of IFRS on each area of your accounts as well as suggestions on how you should next proceed with your conversion project.

Training on IFRS

IFRS is often billed as being the most significant accounting change for a generation. Finance staff, management and non executives need to learn and understand a new language of accounting. PwC can offer you a full range of training solutions. These include training tailored to your organisation's individual needs as well as our unique 'P2P' computer-based IFRS training package.

Technical advice on IFRS

As you might expect with a firm like PwC, we have deep technical specialists in all aspects of government and public sector accounting. We can advise you on an individual basis or through our subscription service which provides you with access to a question and answer service. We also offer an on-line accounting reference service, PwC Inform, which is available at pwcinform.co.uk.

Project management

The transition to IFRS can be a major project for many organisations. PwC can provide strong project management skills and advice to help you ensure that such projects are as efficient and effective as possible.

Advising on data and system changes for IFRS

The transition to IFRS may mean that you need different financial data and that you need to adapt your systems to provide this data. This may also impact on other areas such as your chart of accounts. PwC can provide constructive and informed advice on all these areas.

Modelling the impact of IFRS accounting changes

Some IFRS changes will mean significant differences in the way that some items are accounted for, including potentially PFI transactions. PwC has long-standing experience of modelling the impact of complex transactions and could use this to illustrate the impact of different accounting treatments.

Providing assurance on spreadsheets

Experience has shown that spreadsheets are often used as a temporary measure when restating figures on an IFRS basis. These one-off solutions are usually developed outside your organisation's control environment, and can increase the risks of error and miscalculation. PwC's data assurance specialists can provide you with assurance over these spreadsheets through using tried and tested methodologies.



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finance issue,
involve the whole
organisation

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