



Grant Thornton UK LLP  
8 Finsbury Circus  
London  
EC2M 7EA

**Chief Executive's Department - Finance**  
Sessions House  
County Hall  
Maidstone  
Kent ME14 1XQ

External Tel: (03000) 419205  
Ask for: John Betts  
Email: [john.betts@kent.gov.uk](mailto:john.betts@kent.gov.uk)  
Date: 30 October 2025

Dear Grant Thornton UK LLP

## **Kent County Council**

### **Financial Statements for the year ended 31 March 2025**

This representation letter is provided in connection with the audit of the financial statements of Kent County Council ("the Authority") and its subsidiary undertakings ("the group") as shown in Appendix I to this letter, for the year ended 31 March 2025 for the purpose of expressing an opinion as to whether the group and Authority 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 2024-25 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, as set out in the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited, for the preparation of the group and Authority's financial statements in accordance with the Accounts and Audit Regulations 2015, International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024-25 ("the Code"); in particular the financial statements are fairly presented in accordance therewith.
- ii. We have complied with the requirements of all statutory directions affecting the group and Authority and these matters have been appropriately reflected and disclosed in the financial statements.
- iii. The Authority has complied with all aspects of contractual agreements that could have a material effect on the group and Authority financial statements in the event of non-compliance. There has been no non-compliance with

requirements of any regulatory authorities that could have a material effect on the 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. Such accounting estimates include depreciation and useful lives of property, plant and equipment and the level of provisions. We are satisfied that the material judgements used in the preparation of the financial statements are soundly based, in accordance with the Code and adequately disclosed in the financial statements. We understand our responsibilities includes identifying and considering alternative, methods, assumptions or source data that would be equally valid under the financial reporting framework, and why these alternatives were rejected in favour of the estimate used. During the year we evaluated our estimation process for the implementation of IFRS 16 and made changes, as appropriate. We are satisfied that the methods, the data and the significant assumptions used by us in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in accordance with the Code and adequately disclosed in the financial statements.
- vi. We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme assets and liabilities for International Accounting Standard 19 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 post-employment benefits have been identified and properly accounted for.
- vii. Except as disclosed in the group and Authority financial statements:
  - a. there are no unrecorded liabilities, actual or contingent
  - b. none of the assets of the group and 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. Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards and the Code.
- ix. All events subsequent to the date of the financial statements and for which International Financial Reporting Standards and the Code require adjustment or disclosure have been adjusted or disclosed.
- x. We have considered the unadjusted misstatements schedule included in your Audit Findings Report and attached to this letter. We have not adjusted the financial statements for these misstatements brought to our attention as they are immaterial to the results of the group and Authority and their financial

position at the year-end. The financial statements are free of material misstatements, including omissions.

- xi. Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards.
- xii. We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements.
- xiii. We have updated our going concern assessment. We continue to believe that the group and Authority's financial statements should be prepared on a going concern basis and have not identified any material uncertainties related to going concern on the grounds that:
  - a. the nature of the group and Authority means that, notwithstanding any intention to cease the group and Authority operations in their current form, it will continue to be appropriate to adopt the going concern basis of accounting because, in such an event, services it performs can be expected to continue to be delivered by related public authorities and preparing the financial statements on a going concern basis will still provide a faithful representation of the items in the financial statements
  - b. the financial reporting framework permits the Authority to prepare its financial statements on the basis of the presumption set out under a) above; and
  - c. the group and Authority's system of internal control has not identified any events or conditions relevant to going concern.

We believe that no further disclosures relating to the group and Authority's ability to continue as a going concern need to be made in the financial statements

- xiv. The group and Authority has complied with all aspects of ring-fenced grants that could have a material effect on the group and Authority's financial statements in the event of non-compliance.

### **Information Provided**

- xv. 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 Authority's 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 Authority from whom you determined it necessary to obtain audit evidence.

- xvi. We have communicated to you all deficiencies in internal control of which management is aware.
- xvii. All transactions have been recorded in the accounting records and are reflected in the financial statements.
- xviii. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- xix. We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the group and Authority, and involves:
  - a. management;
  - b. employees who have significant roles in internal control; or
  - c. others where the fraud could have a material effect on the financial statements.
- xx. We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, analysts, regulators or others.
- xxi. We 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 financial statements.
- xxii. We have disclosed to you the identity of the group and Authority's related parties and all the related party relationships and transactions of which we are aware.
- xxiii. We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

### **Annual Governance Statement**

- xxiv. We are satisfied that the Annual Governance Statement (AGS) fairly reflects the group and Authority'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**

- xxv. The disclosures within the Narrative Report fairly reflect our understanding of the group and Authority's financial and operating performance over the period covered by the financial statements.

### **Approval**

The approval of this letter of representation was minuted by the Council's Governance and Audit Committee at its meeting on 30 October 2025.

Yours faithfully

.....

Name: Michael Brown

Position: Chair of the Governance and Audit Committee

Date: 30 October 2025

.....

Name: John Betts

Position: Interim Corporate Director Finance

Date: 30 October 2025

**Signed on behalf of the Council**

## **Appendix I – List of subsidiary undertakings**

Global Commercial Services Group Ltd (Holding Company)	100% subsidiary
Commercial Services Trading Ltd	100% subsidiary
CSG Global Education Ltd	100% subsidiary
Landscapes for Learning Ltd	100% subsidiary
Lifecycle Management Group Ltd	100% subsidiary
Prospects Payroll Ltd	100% subsidiary
Kent Waste Management LLP	100% subsidiary
UK Teach Ltd	100% subsidiary
Groupe WF Education	100% subsidiary
WF Education Group Holdings Ltd	100% subsidiary
WF Education Group Ltd	100% subsidiary
Commercial Services Kent Ltd	100% subsidiary
Bowerhouse II Solar Ltd	100% subsidiary
PeopleTech Services Ltd	100% subsidiary
Hampshire and Kent Commercial Services LLP	Joint venture
Luton and Kent Commercial Services LLP	Joint venture
Surrey and Kent Commercial Services LLP	Joint venture
Dudley and Kent Commercial Services Ltd	Joint venture
Dorset and Kent Commercial Services LLP	Joint venture
Hackney and Kent Commercial Services LLP	Joint venture
Halton and Kent Commercial Services LLP	Joint venture
Cantium Business Solutions Ltd	100% subsidiary
EDSECO Ltd (trading as The Education People)	100% subsidiary
Invicta Law Ltd	100% subsidiary
Gen2 Property Ltd	100% subsidiary

## Appendix II – Schedule of unadjusted misstatements

Detail	Comprehensive Income & Expenditure Statement (£000s)	Balance Sheet (£000s)	Impact on total net expenditure (£000s)	Impact on general fund (£000s)	Reason for not adjusting
<u>Pension Fund Liability</u> Identifying the Council's share of a projected error in the pension fund liability at 31 March 2025		DR Pension Liability 3,400 CR Pensions Reserve (3,400)	Nil	Nil	Immaterial, projected difference
<u>Depreciation</u> Calculation of depreciation not charged in the year of acquisition	DR Depreciation expense 2,996	CR Accumulated depreciation (2,996)	2,996	Nil	Immaterial, projected difference
<u>Schools cash balances</u> Projected error arising from schools bank reconciliations not performed at 31 March 2025	DR Income 3,207	CR Cash (3,207)	3,207	(3,207)	Immaterial, projected difference
<u>Provision for doubtful debts – Adult Social Care</u> Difference arising from audit calculation for provision for doubtful social care debts using more prudent assumptions	DR Expenditure 19,292	CR Provision for doubtful debts (19,292)	19,292	(19,292)	Immaterial, projected difference