



**Andrew Humble**

Corporate Director Finance and Section 151 Officer

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**Email:** Andrew\_Humble@middlesbrough.gov.uk

Mark Kirkham  
Partner  
Forvis Mazars  
5<sup>th</sup> Floor  
3, Wellington Place  
LEEDS  
LS1 4AP

19 February 2026

Dear Mark,

Middlesbrough Council – Audit for the Year Ended 31 March 2025

This representation letter is provided in connection with your audit of the financial statements of Middlesbrough Council (the Council) for the year ended 31 March 2025 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25 (the Code), and applicable law.

I confirm that the following representations are made on the basis of enquiries of management and staff with relevant knowledge and experience (and, where appropriate, inspection of supporting documentation) sufficient to satisfy myself that I can properly make each of the following representations to you.

**My responsibility for the financial statements and accounting information**

I believe that I have fulfilled my responsibilities for the true and fair presentation and preparation of the financial statements in accordance with the Code, as amended by applicable law.

**My responsibility to provide and disclose relevant information**

I have provided you with:

- access to all information of which I am aware that is relevant to the preparation of the financial statements such as records, documentation and other material.
- additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to individuals within the Council you determined it was necessary to contact in order to obtain audit evidence.

I confirm as Corporate Director Finance that I have taken all the necessary steps to make myself aware of any relevant audit information and to establish that you, as auditors, are aware of this information.

As far as I know there is no relevant audit information of which you, as auditors, are unaware.

I confirm that there is no information provided to you as part of the audit that I consider legally privileged.

### **Accounting records**

I confirm that all transactions that have a material effect on the financial statements have been recorded in the accounting records and are reflected in the financial statements. All other records and related information, including minutes of all Council and committee meetings, have been made available to you.

### **Accounting policies**

I confirm that I have reviewed the accounting policies applied during the year in accordance with International Accounting Standard 8 and consider these policies to faithfully represent the effects of transactions, other events or conditions on the Council's financial position, financial performance and cash flows.

### **Accounting estimates, including those measured at current and/or fair value**

I confirm that the methods, significant assumptions and the data used by the Council in making the accounting estimates, including those measured at current and/or fair value, are appropriate to achieve recognition, measurement or disclosure that is in accordance with the applicable financial reporting framework.

### **Contingencies**

There are no material contingent losses including pending or potential litigation that should be accrued where:

- information presently available indicates that it is probable that an asset has been impaired or a liability had been incurred at the balance sheet date; and
- the amount of the loss can be reasonably estimated.

There are no material contingent losses that should be disclosed where, although either or both the conditions specified above are not met, there is a reasonable possibility that a loss, or a loss greater than that accrued, may have been incurred at the balance sheet date.

There are no contingent gains which should be disclosed.

All material matters, including unasserted claims, that may result in litigation against the Council have been brought to your attention. All known actual or possible litigation and claims whose effects should be considered when preparing the financial statements have been disclosed to you and accounted for and disclosed in accordance with the Code, as amended by applicable law.

### **Laws and regulations**

I confirm that I have disclosed to you all those events of which I am aware which involve known or suspected non-compliance with laws and regulations, together with the actual or contingent consequences which may arise therefrom.

The Council has complied with all aspects of contractual agreements that would have a material effect on the accounts in the event of non-compliance.

**Fraud and error**

I acknowledge my responsibility as Corporate Director Finance for the design, implementation and maintenance of internal control to prevent and detect fraud and error and I believe I have appropriately fulfilled those responsibilities.

I have disclosed to you:

- all the results of my assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- all knowledge of fraud or suspected fraud affecting the Council involving:
  - management and those charged with governance.
  - employees who have significant roles in internal control; and
  - others where fraud could have a material effect on the financial statements.

I have disclosed to you all information in relation to any allegations of fraud, or suspected fraud, affecting the Council's financial statements communicated by employees, former employees, analysts, regulators or others.

**Related party transactions**

I confirm that all related party relationships, transactions and balances, have been appropriately accounted for and disclosed in accordance with the requirements of the Code, as amended by applicable law.

I have disclosed to you the identity of the Council's related parties and all related party relationships and transactions of which I am aware.

**Impairment review**

To the best of my knowledge, there is nothing to indicate that there is a permanent reduction in the recoverable amount of the property, plant and equipment, investment properties, and intangible assets below their carrying value at the balance sheet date. An impairment review is therefore not considered necessary.

**Charges on assets**

All the Council's assets are free from any charges exercisable by third parties except as disclosed within the financial statements.

**Future commitments**

The Council has no plans, intentions or commitments that may materially affect the carrying value or classification of assets and liabilities or give rise to additional liabilities.

**Subsequent events**

I confirm all events subsequent to the date of the financial statements and for which the Code, as amended by applicable law, require adjustment or disclosure have been adjusted or disclosed.

Should further material events occur after the date of this letter which may necessitate revision of the figures included in the financial statements or inclusion of a note thereto, I will advise you accordingly.

### **Impacts of Russian Forces entering Ukraine**

I confirm that I have carried out an assessment of the impact of Russian Forces entering Ukraine on the Council, and there is no significant impact from restrictions or sanctions in place.

### **Tariffs**

I confirm that I have carried out an assessment of the potential impact of changes in US trade policy in respect of tariffs, including the impact of reciprocal tariffs by other countries, including the impact of mitigation measures and uncertainties, and there is no significant impact from tariffs.

### **Going concern**

To the best of my knowledge there is nothing to indicate that the Council will not continue as a going concern in the foreseeable future. The period to which I have paid particular attention in assessing the appropriateness of the going concern basis is not less than twelve months from the date of approval of the accounts.

### **Annual Governance Statement**

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

### **Narrative Report**

The disclosures within the Narrative Report fairly reflect my understanding of the Council's financial and operating performance over the period covered by the financial statements.

### **Unadjusted misstatements**

I confirm that the effects of the uncorrected misstatements are immaterial, both individually and in aggregate, to the financial statements as a whole. A list of the uncorrected misstatements is attached to this letter as an Appendix.

In particular, I would like make specific representation in relation to the adopted roads issue raised within the audit completion report. This amount is material to the financial statements, at a net book value of £21.666m. Our accounting policy is to recognise highways infrastructure at historic cost and to subsequently depreciate these assets over their useful life.

In relation to adopted roads, these assets are generally constructed by developers and then transferred to the Council for responsibility and maintenance going forward based on a Section 38 agreement under the Highways Act 1980. We have then used the developer's construction cost to estimate the historic cost as the recognition value in the balance sheet.

We accept that the Council has not paid for these assets to be constructed and understand your rationale that these assets should be recognised at nil value. However, we do feel that the S38 values are a good proxy for historic cost and that recognition at nil value would significantly underestimate the service and economic benefits consumed from these assets in future years. We will discuss this matter further with the Chartered Institute of Public Finance and Accountancy (CIPFA) and reflect their advice in the preparation of the 2025/26 statement of accounts.

**Arrangements to achieve economy, effectiveness and efficiency in Use of Resources (Value for Money arrangements)**

I confirm that I have disclosed to you all findings and correspondence from regulators for previous and ongoing inspections of which I am aware. In addition, I have disclosed to you any other information that would be considered relevant to your work on value for money arrangements.

*Yours faithfully,*

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Andrew Humble, Corporate Director Finance - S151 Officer  
Middlesbrough Council

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Jill Ewan  
Chair of the Audit Committee  
Middlesbrough Council

**Appendix - Schedule of Unadjusted Misstatements**

Description	Comprehensive Income and Expenditure Statement		Balance Sheet	
	Dr (£ '000)	Cr (£ '000)	Dr (£ '000)	Cr (£ '000)
Dr: Capital Adjustment Account			21,666	
Cr: Property, plant and equipment, infrastructure				21,666
Adopted highways accounted for as donated assets based on developer costs in the original development agreements.				
Dr: CIES financing and investment activities - expenditure	2,262			
Cr: Investment properties				2,262
The £2.262m remeasurement of the Centre Square lease on transition to IFRS 16 has been accounted for as a donated asset, so as an addition to the Investment Properties balance. However, in accordance with the CIPFA Code, this remeasurement adjustment should have been charged to the CIES, Financing & Investment Activities Expenditure, as part of the Movement in Fair Value of Investment Properties. This item would then be reversed out to the Capital Adjustment Account via the Movement in Reserves Statement.				
<b>Aggregate effect of unadjusted misstatements</b>	<b>2,262</b>		<b>21,666</b>	<b>21,928</b>