

# Audit of Accounts Report – The County Council of the City and County of Cardiff

Audit year: 2020-21

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We welcome correspondence and telephone calls in Welsh and English. Corresponding in Welsh will not lead to delay. Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

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We intend to issue an unqualified audit report on your Accounts. There are some issues to report to you prior to their approval.

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# Audit of Accounts Report

## Introduction

- 1 We summarise the main findings from our audit of your 2020-21 statement of accounts in this report.
- 2 We have already discussed these issues with the Corporate Director of Resources and Head of Finance.
- 3 Auditors can never give complete assurance that accounts are correctly stated. Instead, we work to a level of 'materiality'. This level of materiality is set to try to identify and correct misstatements that might otherwise cause a user of the accounts into being misled.
- 4 We set this level at £13.2 million for this year's audit.
- 5 There are some areas of the accounts that may be of more importance to the reader and we have set a lower materiality level for these, as follows:
  - Senior Officer Remuneration - £1,000
  - Related Party Transactions - £10,000
- 6 We have now substantially completed this year's audit work.
- 7 In our professional view, we have complied with the ethical standards that apply to our work; remain independent of yourselves; and our objectivity has not been compromised in any way.
- 8 However, in our Audit Plan dated March 2021, we brought to your attention one potential conflict of interest. This relates to the Financial Audit Manager who is a former colleague and friend of the Council's Operational Manager for Information Governance, Transactional Finance and Programme Management within the Resources Directorate. I can confirm that planned safeguards set out in the Audit Plan have operated as intended in respect of this matter. I can also confirm that, all other members of my team are independent of the Council and its senior officers.

## Impact of COVID-19 on this year's audit

- 9 The COVID-19 pandemic has had a significant impact on all aspects of our society and continues to do so. You are required by law to prepare accounts and it is of considerable testament to the commitment of your accounts team that you have succeeded in doing so this year in the face of the challenges posed by this pandemic. We are extremely grateful to the professionalism of the team in supporting us to complete our audit in such difficult circumstances.
- 10 The pandemic has unsurprisingly affected our audit and we summarise in **Exhibit 1** the main impacts. Other than where we specifically make recommendations, the detail in **Exhibit 1** is provided for information purposes only to help you understand the impact of the COVID-19 pandemic on this year's audit process.

## Exhibit 1 – impact of COVID-19 on this year’s audit

<p><b>Timetable</b></p>	<ul style="list-style-type: none"> <li>• The statutory deadline for the completion of the draft accounts was 31 May 2021. However, given the continuing impact of the COVID-19 pandemic, the Welsh Government extended the timeline for the completion of the draft accounts to 31 August 2021.</li> <li>• In addition, the timeline for the publication of final audited accounts was extended from 31 July to 30 November for all local government bodies in Wales.</li> <li>• We received the draft accounts on 15 June 2021 ahead of the revised deadline.</li> <li>• We expect your audit report to be signed by the end of October 2021</li> </ul>
<p><b>Electronic signatures</b></p>	<p>The Corporate Director Resources provided an electronic signature, along with a supporting e-mail to confirm that he had certified the statement of accounts. We will continue to accept the use of electronic signatures and electronic transfer of files during the approval and signing process.</p>
<p><b>Audit evidence</b></p>	<p>As in previous years, we received all of the audit evidence in electronic format and we have used various techniques to ensure its validity. Where we have been unable to obtain access to paper documents because of COVID-19 restrictions, we have devised alternative audit methodologies to obtain sufficient audit evidence. Specifically:</p> <ul style="list-style-type: none"> <li>• officers provided electronic working papers in accordance with our agreed Audit Deliverables Report;</li> <li>• officers provided audit evidence to the audit team via secure e-mail or via the secure ‘Sharepoint’ folder which was accessible to Audit Wales staff remotely; and</li> <li>• officers were available through Microsoft Teams for video conference meetings, and to share on-screen information/evidence.</li> </ul>
<p><b>Other</b></p>	<ul style="list-style-type: none"> <li>• Video conferencing has enabled the audit team to correspond effectively with officers throughout the audit.</li> <li>• Video-conference-based Governance and Audit Committee meetings have enabled us to proficiently discharge our responsibility for reporting to those charged with governance.</li> </ul>

- 11 We will be reviewing what we have learned for our audit process from the COVID-19 pandemic and whether there are innovative practices that we might adopt in the future to enhance that process.

## Proposed audit opinion

- 12 We intend to issue an unqualified audit opinion on this year's accounts once you have provided us with a Letter of Representation based on that set out in **Appendix 1**.
- 13 We issue a 'qualified' audit opinion where we have material concerns about some aspects of your accounts; otherwise we issue an unqualified opinion.
- 14 The Letter of Representation contains certain confirmations we are required to obtain from you under auditing standards along with confirmation of other specific information you have provided to us during our audit.
- 15 Our proposed audit report is set out in **Appendix 2**. Whilst our audit opinion is unqualified, it includes two emphasis of matter paragraphs, drawing the readers attention to certain disclosures in the financial statements:

### **Material uncertainty in relation to the valuation of Council Dwellings**

The assumptions made about the future and other sources of estimation uncertainty on page 39 of the financial statements describe the impact of material valuation uncertainties arising from the COVID-19 pandemic on the valuation of the Council's dwellings provided by its professional valuers. I have drawn the reader's attention to this disclosure in an emphasis of matter paragraph in my audit report.

### **Material uncertainty in relation to the valuation of the Council's High Rise Dwellings**

The assumptions made about the future and other sources of estimation uncertainty on page 39 of the financial statements describes the material uncertainty in the valuation of the Council's high-rise dwellings provided by the Council's external professional valuers in the aftermath of the Grenfell fire. I have drawn the reader's attention to this disclosure in an emphasis of matter paragraph in my audit report.

- 16 The Council has disclosed the nature and impact of the material uncertainties and my opinion is not modified in respect of these matters.

## Significant issues arising from the audit

### Uncorrected misstatements

- 17 We set out below the one misstatement we identified in the accounts, which has been discussed with management but remains uncorrected. We do not consider this to be material to our audit opinion.
- 18 The misstatement relates to a downward revaluation of an investment property that had not been transferred through the Capital Adjustment Account on the Council's consolidation of the Cardiff Capital Regional City Deal Joint Committee accounts. The impact of this unadjusted misstatement is that the General Fund balance is understated by £1.8 million and the unusable Capital Adjustment Account balance correspondingly overstated.
- 19 Whilst Auditing Standards require us to request that this is corrected, we accept management's view that given the number of entries required to amend the statements for relatively low values and the tight timescales for closure of the audit, there is little benefit in amending the statement of accounts. We request that the Governance and Audit Committee considers approving management's rationale for this and include this in the Letter of Representation.

### Corrected misstatements

- 20 There were initially misstatements in the accounts that have now been corrected by management. However, we believe that these should be drawn to your attention and they are set out with explanations in **Appendix 3**.

### Other significant issues arising from the audit

- 21 In the course of the audit, we consider a number of matters relating to the accounts and report any significant issues arising to you. There were no issues arising in these areas this year.

# Appendix 1

## Final Letter of Representation

[Audited body's letterhead]

Auditor General for Wales  
Wales Audit Office  
24 Cathedral Road  
Cardiff  
CF11 9LJ

21 October 2021

### Representations regarding the 2020-21 financial statements

This letter is provided in connection with your audit of the financial statements of the County Council of the City and County of Cardiff and its group for the year ended 31 March 2021 for the purpose of expressing an opinion on their truth and fairness and their proper preparation.

We confirm that to the best of our knowledge and belief, having made enquiries as we consider sufficient, we can make the following representations to you.

### Management representations

#### Responsibilities

We have fulfilled our responsibilities for:

- the preparation of the financial statements in accordance with legislative requirements and the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21; in particular the financial statements give a true and fair view in accordance therewith; and
- the design, implementation, maintenance and review of internal control to prevent and detect fraud and error.

### Information provided

We have provided you with:

- Full access to:
  - all information of which we are aware that is relevant to the preparation of the financial statements such as books of account and supporting documentation, minutes of meetings and other matters;

- additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to staff from whom you determined it necessary to obtain audit evidence.
- The results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- Our knowledge of fraud or suspected fraud that we are aware of and that affects the Council and involves:
  - management;
  - employees who have significant roles in internal control; or
  - others where the fraud could have a material effect on the financial statements.
- Our knowledge of any allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, regulators or others.
- Our knowledge of all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing the financial statements.
- The identity of all related parties and all the related party relationships and transactions of which we are aware.

## Financial statement representations

All transactions, assets and liabilities have been recorded in the accounting records and are reflected in the financial statements.

The methods, the data and the significant assumptions used in making accounting estimates, and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in the context of the applicable financial reporting framework.

Related party relationships and transactions have been appropriately accounted for and disclosed.

All events occurring subsequent to the reporting date which require adjustment or disclosure have been adjusted for or disclosed.

All known actual or possible litigation and claims whose effects should be considered when preparing the financial statements have been disclosed to the auditor and accounted for and disclosed in accordance with the applicable financial reporting framework.

The financial statements are free of material misstatements, including omissions. The effects of uncorrected misstatements identified during the audit are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. There is one misstatement within the accounts, which remains uncorrected. This relates to a

downward revaluation of an investment property that has not been transferred through the Capital Adjustment Account on the Council's consolidation of the Cardiff Capital Regional City Deal Joint Committee accounts. The impact of this unadjusted misstatement is that the General Fund balance is understated by £1.8 million and the unusable Capital Adjustment Account balance correspondingly overstated. Management have confirmed that this will be corrected in the 2021-22 financial year and as the amount is not material, we have not amended the financial statements.

## **Representations by the County Council of the City and County of Cardiff**

We acknowledge that the representations made by management, above, have been discussed with us.

We acknowledge our responsibility for the preparation of true and fair financial statements in accordance with the applicable financial reporting framework. The financial statements were approved by Members of the County Council of the City and County of Cardiff on 21 October 2021.

We confirm that we have taken all the steps that we ought to have taken in order to make ourselves aware of any relevant audit information and to establish that it has been communicated to you. We confirm that, as far as we are aware, there is no relevant audit information of which you are unaware.

Signed by:

Corporate Director Resources

Date: 21 October 2021

Signed by:

Chair of the Council – signed on behalf  
of those charged with governance

Date: 21 October 2021

# Appendix 2

## Proposed Audit Report

### The independent auditor's report of the Auditor General for Wales to the members of the County Council of the City and County of Cardiff

#### Opinion on financial statements

I have audited the financial statements of:

- the County Council of the City and County of Cardiff; and
- the County Council of the City and County of Cardiff Group

for the year ended 31 March 2021 under the Public Audit (Wales) Act 2004.

The County Council of the City and County of Cardiff's financial statements comprise the Movement in Reserves Statement, the Comprehensive Income and Expenditure Statement, the Balance Sheet, the Cash Flow Statement, the Movement on the Housing Revenue Account Statement and the Housing Revenue Account Income and Expenditure Statement and the related notes, including a summary of significant accounting policies.

The County Council of the City and County of Cardiff's Group financial statements comprise the Group Movement in Reserves Statement, the Group Comprehensive Income and Expenditure Statement, the Group Balance Sheet and the Group Cash Flow Statement and the related notes, including a summary of significant accounting policies.

The financial reporting framework that has been applied in their preparation is applicable law and international accounting standards as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21.

In my opinion the financial statements:

- give a true and fair view of the financial position of the County Council of the City and County of Cardiff and the County Council of the City and County of Cardiff's Group as at 31 March 2021 and of its income and expenditure for the year then ended; and
- have been properly prepared in accordance with legislative requirements and international accounting standards as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21.

#### Basis of opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing in the UK (ISAs (UK)) and Practice Note 10 'Audit of Financial Statements of Public Sector Entities in the United Kingdom'. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I am independent of the Council and its group in

accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled my other ethical responsibilities in accordance with these requirements. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

### **Emphasis of matter - effects of the COVID-19 pandemic on the valuation of Council Dwellings**

I draw attention to the assumptions made about the future and other sources of estimation uncertainty on page 39 of the financial statements, which describes the impact of the COVID-19 pandemic and the material uncertainty of the valuation of the Council's dwellings provided by the Council's external professional valuers.

My opinion is not modified in respect of this matter.

### **Emphasis of matter - valuation of Council High-Rise Dwellings in the aftermath of the Grenfell fire**

I draw attention to the assumptions made about the future and other sources of estimation uncertainty on page 39 of the financial statements, which describes the material uncertainty in the valuation of the Council's high-rise dwellings provided by the Council's external professional valuers in the aftermath of the Grenfell fire.

My opinion is not modified in respect of this matter.

### **Conclusions relating to going concern**

In auditing the financial statements, I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Council's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the responsible financial officer with respect to going concern are described in the relevant sections of this report.

### **Other Information**

The other information comprises the information included in the annual report other than the financial statements and my auditor's report thereon. The Responsible Financial Officer is responsible for the other information contained within the annual report. My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my report, I do not express any form of assurance conclusion thereon. My responsibility is to read the other information and, in doing so,

consider whether the other information is materially inconsistent with the financial statements or knowledge obtained in the course of the audit, or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

## **Report on other requirements**

### **Opinion on other matters**

In my opinion, based on the work undertaken in the course of my audit:

- the information contained in the Narrative Report for the financial year for which the financial statements are prepared is consistent with the financial statements and the Narrative Report has been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21;
- the information given in the Annual Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and the Annual Governance Statement has been prepared in accordance with guidance.

### **Matters on which I report by exception**

In the light of the knowledge and understanding of the Council and the group and its environment obtained in the course of the audit, I have not identified material misstatements in the Narrative Report or the Annual Governance Statement.

I have nothing to report in respect of the following matters, which I report to you, if, in my opinion:

- adequate accounting records have not been kept, or returns adequate for my audit have not been received from branches not visited by my team;
- the financial statements are not in agreement with the accounting records and returns; or
- I have not received all the information and explanations I require for my audit.

## Responsibilities

### Responsibilities of the responsible financial officer for the financial statements

As explained more fully in the Statement of Responsibilities for the Statement of Accounts, the responsible financial officer is responsible for the preparation of the statement of accounts, including the County Council of the City and County of Cardiff Group financial statements, which give a true and fair view, and for such internal control as the responsible financial officer determines is necessary to enable the preparation of statements of accounts that are free from material misstatement, whether due to fraud or error.

In preparing the statement of accounts, the responsible financial officer is responsible for assessing the Council's and group's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless deemed inappropriate.

### Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud.

My procedures included the following:

- enquiring of management and those charged with governance, including obtaining and reviewing supporting documentation relating to the County Council of the City and County of Cardiff's policies and procedures concerned with:
  - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
  - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud; and
  - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.

- considering as an audit team how and where fraud might occur in the financial statements and any potential indicators of fraud. As part of this discussion, I identified potential for fraud in the following areas: revenue recognition and posting of unusual journals.
- obtaining an understanding of the County Council of the City and County of Cardiff's framework of authority as well as other legal and regulatory frameworks that Cardiff Council operates in, focusing on those laws and regulations that had a direct effect on the financial statements or that had a fundamental effect on the operations of Cardiff Council.

In addition to the above, my procedures to respond to identified risks included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with relevant laws and regulations discussed above;
- enquiring of management and the Governance and Audit Committee about actual and potential litigation and claims;
- reading minutes of meetings of those charged with governance, the Cabinet and Council;
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I also communicated relevant identified laws and regulations and potential fraud risks to all audit team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the County Council of the City and County of Cardiff's 'controls, and the nature, timing and extent of the audit procedures performed.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of my auditor's report.

## **Certificate of completion of audit**

I certify that I have completed the audit of the accounts of Cardiff Council in accordance with the requirements of the Public Audit (Wales) Act 2004 and the Auditor General for Wales' Code of Audit Practice.

Adrian Crompton  
Auditor General for Wales  
28 October 2021

24 Cathedral Road  
Cardiff  
CF11 9LJ

# Appendix 3

## Summary of Corrections Made

During our audit we identified the following misstatements that have been corrected by management, but which we consider should be drawn to your attention due to their relevance to your responsibilities over the financial reporting process.

### Exhibit 2: summary of corrections made

Value of correction	Nature of correction	Reason for correction
£25.117m	<b>Note 17 – Short Term Debtors and Note 19 – Short Term Creditors</b> Decrease in both short-term debtors and short-term creditors.	This amendment corrects an overstatement of the debtor and creditor balances.  <b>There is no overall impact on the Balance Sheet</b>
£8.357m	<b>Note 14 – Non-Current Assets</b> Increase in 'Movements in Cost or Values' value at 31 March 2020 for 'Other Land & Buildings' with a corresponding decrease of the value at 31 March 2020 for 'P,P&E Under Construction'	This amendment corrects a presentational error in the comparative figure
£5.139m	<b>Comprehensive Income and Expenditure</b> Decrease in both income and expenditure for the following directorates: <ul style="list-style-type: none"><li>• Housing &amp; Communities - £0.754m</li><li>• Planning, Transport &amp; Environment £0.001m</li><li>• Social Services - £4.384m</li></ul>	These amendments correct errors in working papers supporting the figures in the financial statements  <b>There is nil impact on the overall CIES out-turn</b>

Value of correction	Nature of correction	Reason for correction
£4.357m	<p><b>Note 14 – Non-Current Assets</b> Reduction in both the ‘Impairment Losses/Reversals to SDPS and ‘Impairment Losses/Reversals to RR’ lines across two asset categories as follows:</p> <p>Surplus Assets - £2.874m P,P&amp; £ Under Construction - £1.483m</p>	This amendment corrects a misclassification error within the Note.
£3.126m	<p><b>Note 14 – Non-Current Assets</b> Reduction in ‘Additions’ for ‘Vehicles, Plant &amp; Equipment’ with a corresponding increase in ‘Other Reclassifications – Transfers’</p> <p>Also an increase in ‘Additions’ for ‘P,P&amp;E under construction’ with a corresponding decrease in ‘Other Reclassifications – Transfers’</p>	This amendment is to correct misclassifications between line items within this Note.
£2.500m	<p><b>Note 14 – Non-Current Assets – Investment properties</b> Increase in the ‘Disposals’ figure for investment properties</p>	This amendment is to reflect the disposal of an investment property no longer owned by the Council.

Value of correction	Nature of correction	Reason for correction
£2.285m	<p><b>HRA Accounts – Note 1 Adjustments between Accounting Basis and Funding Basis under Regulations</b></p> <p>Within the 'Adjustments primarily involving the Capital Adjustment Account', an increase in 'Non-current assets written off as part of the gain/loss on disposal to the HRA Income and Expenditure Account' of £2.285m and a corresponding decrease in the same line within the 'Adjustments involving the Revaluation Reserve'</p>	<p>This amendment corrects a presentational error between line items within the Note,</p>
£1.053m	<p><b>Note 17 – Debtors</b></p> <p>Decrease in 'other entities and individuals' of £1.053m, an increase in 'Central government bodies' of £1.041m and an increase in 'other local authorities and NHS' of £0.012m</p>	<p>This amendment is to correct misclassifications between line items within this Note.</p>
Various	<p><b>Note 10 – Related Parties</b></p> <p>Two related party disclosures were omitted in relation to interests in the following organisations:</p> <ul style="list-style-type: none"> <li>• Wales &amp; West Housing – expenditure of £66K and income of £168K</li> <li>• Trustees of Cardiff Cycle Workshop – expenditure of £2K and income of £15K</li> </ul> <p>Other minor narrative adjustments were also identified.</p>	<p>The amendments have been made to comply with the CIPFA Code and to provide clarification to the reader of the financial statements</p>

Value of correction	Nature of correction	Reason for correction
Various	<p><b>Note 8.3 Senior Officer Remuneration</b></p> <p>The comparative figures for the current and previous s151 Officer were disclosed on the wrong lines</p> <p>An additional footnote has been included to explain the salary uplift of £1,469 agreed and paid to the Director of Social Services after the draft accounts were prepared.</p>	<p>The amendments correct a presentational error with the comparative figure and provide further clarification to the reader of the financial statements.</p>
Various narrative and minor numerical presentation adjustments throughout the account	<p>Various numerical and narrative which include for example:</p> <ul style="list-style-type: none"> <li>• <b>Assumptions made about the future and other sources or estimation uncertainty</b> Inclusion of a material uncertainty valuation note in relation to high-rise dwellings in the aftermath of the Grenfell fire.</li> <li>• <b>Annual Governance Statement</b> Correction of some dates and other narrative changes for clarification.</li> <li>• <b>Cashflow Statement</b> Various presentational and amendments</li> <li>• <b>Group Accounts</b> Various presentational amendments</li> </ul>	<p>A number of minor numerical, presentational and narrative changes have been made to various notes in the financial statements to provide more clarification to the reader, to correct casting errors and any internal inconsistencies.</p>





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We welcome correspondence and telephone calls in Welsh and English.  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.