AGENDA ITEM 5 REPORT No PC/02/15



AUDIT SCOTLAND The Highland Council Pension Fund **Annual Audit Plan** 2014/15

Prepared for The Highland Council as Administering Authority for the Highland Pension Fund

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Audit Scotland is a statutory body set up in April 2000 under the Public Finance and Accountability (Scotland) Act 2000. We help the Auditor General for Scotland and the Accounts Commission check that organisations spending public money use it properly, efficiently and effectively.

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Summary

Introduction

- Our audit is focused on the identification and assessment of the risks of material misstatement in the Highland Council Pension Fund's (the Pension Fund's) financial statements.
- 2. This report summarises the key challenges and risks facing the Pension Fund and sets out the audit work that we propose to undertake in 2014/15. Our plan reflects:
 - the risks and priorities facing the Pension Fund
 - current national risks that are relevant to local circumstances
 - the impact of changing international auditing and accounting standards
 - our responsibilities under the Code of Audit Practice as approved by the Auditor General for Scotland
 - issues brought forward from previous audit reports.

Summary of planned audit activity

- 3. Our planned work in 2014/15 includes:
 - an audit of the financial statements and provision of an opinion on whether:
 - they give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2015 and disposition at that date of its assets and liabilities
 - the accounts have been properly prepared in accordance with the Local Government (Scotland) Act 1973 and the 2014/15 Code of Practice on Local Authority Accounting in the United Kingdom (the Code)
 - a review and assessment of the Pension Fund's governance and performance arrangements in a number of key areas to support the governance compliance statement and information in the annual report
 - provision of the annual report on the audit addressed to elected members and the Controller of Audit.

Responsibilities

 The audit of the financial statements does not relieve management or the Pensions Committee, as the body charged with governance, of their responsibilities.

Responsibility of the appointed auditor

- Our responsibilities, as independent auditor, are established by the Local Government (Scotland) Act 1973 and the Code of Audit Practice, and guided by the auditing profession's ethical guidance.
- 6. Auditors in the public sector give an independent opinion on the financial statements. We also review and report on the arrangements set in place by the audited body to ensure the proper conduct of its financial affairs and to manage its performance and use of resources. In doing this, we aim to support improvement and accountability.

Responsibility of the Director of Finance

- 7. It is the responsibility of the Director of Finance, as the appointed "proper officer", to prepare the financial statements in accordance with relevant legislation and the Code. This means:
 - maintaining proper accounting records
 - preparing financial statements which give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2015 and the amount and disposition at that date of its assets and liabilities.

Format of the accounts

8. The financial statements should be prepared in accordance with the Code which constitutes proper accounting practice.

Audit Approach

Our approach

- 9. Our audit approach is based on an understanding of the characteristics, responsibilities, principal activities, risks and governance arrangements of the Pension Fund. We also consider the key audit risks and challenges in the local government sector generally. This approach includes:
 - understanding the business of the Pension Fund and the risk exposure which could impact on the financial statements
 - assessing the key systems of internal control, and considering how risks in these systems could impact on the financial statements
 - identifying major transaction streams, balances and areas of estimation and understanding how the Pension Fund will include these in the financial statements
 - assessing and addressing the risk of material misstatement in the financial statements
 - determining the nature, timing and extent of the audit procedures necessary to provide us with sufficient audit evidence as to whether the financial statements give a true and fair view.

- 10. We have also considered and documented the sources of assurance which will make best use of our resources and allow us to focus audit testing on higher risk areas during the audit of the financial statements. The main areas of assurance for the audit come from planned management action and reliance on systems of internal control. Management action being relied on for 2014/15 includes:
 - comprehensive closedown procedures for the financial statements accompanied by a timetable issued to all relevant staff
 - clear responsibilities for the preparation of the financial statements and the provision of supporting working papers
 - delivery of unaudited financial statements to agreed timescales with a comprehensive working papers package
 - completion of the internal audit programme for 2014/15.
- 11. Auditing standards require internal and external auditors to work closely together to make best use of available audit resources. We seek to rely on the work of internal audit wherever possible and as part of our planning process we carry out an early assessment of the internal audit function. Our review concluded that the Highland Council's internal audit section, which provides internal audit services to the Pension Fund, generally operates in accordance with the Public Sector Audit Standards, and noted that an action plan has been prepared to address areas of non-compliance.

12. We plan to place formal reliance on internal audit's review of Pensions Investments, and the work they undertake to support the Head of Audit and Risk Management's opinion on the Pension Fund's system of internal control, as part of our audit of the 2014/15 financial statements.

Materiality

- International Standard on Auditing 320 provides guidance on the concept of materiality. We consider materiality and its relationship to audit risk when planning the nature, timing and extent of our audit and conducting our audit procedures. Specifically with regard to the financial statements, we assess the materiality of uncorrected misstatements, both individually and collectively.
- Based on our knowledge and understanding of the Pension Fund we have set our planning materiality at 10% of contributions receivable. For 2014/15 planning materiality is £5.1 million.
- 15. We set a lower level, known as performance materiality, when defining our audit procedures. This level depends on professional judgement and is informed by a number of factors including:
 - extent of estimation and judgement within the financial statements
 - nature and extent of prior year misstatements

- extent of audit testing coverage.
- 16. For 2014/15 performance materiality has been set at £2.5 million We will report, to those charged with governance, all misstatements greater than £100,000.
- 17. In addition, an inaccuracy which would not normally be regarded as material in terms of monetary value may be important for other reasons (for example the failure to achieve a statutory requirement, or an item contrary to law). In the event of such an item arising, its materiality has to be viewed in a narrower context. Such matters would normally fall to be covered in an explanatory paragraph in the independent auditor's report.

Reporting arrangements

18. The Local Authority Accounts (Scotland) Regulations 2014 require that the unaudited annual accounts are submitted to the appointed external auditor no later than 30 June each year; and that elected members consider the unaudited annual accounts at a meeting by 31 August. The Pension Fund must also publish the unaudited accounts on its website and give public notice of the inspection period.

- 19. The 2014 regulations require the Pensions Committee to meet by 30 September to consider whether to approve the audited annual accounts for signature. Immediately after approval, the annual accounts require to be signed and dated by specified members and officers and then be provided to the auditor. The Controller of Audit requires that the independent auditor's report (opinion) be issued by 30 September each year.
- 20. The Pension Fund is required to publish on its website its signed audited annual accounts, and the audit certificate, by 31 October. The annual audit report is required to be published on the website by 31 December.
- 21. An agreed timetable is included at Exhibit 1 below which takes account of submission requirements and the dates of planned Pensions Committee meetings.
- 22. Matters arising from our audit will be reported on a timely basis and will include agreed action plans. Draft management reports will be issued to the responsible head of service and relevant officers to confirm factual accuracy. Responses to draft reports are expected within three weeks of submission. A copy of all final agreed reports will be sent to the Chief Executive, Director of Finance, relevant senior manager, the Head of Audit & Risk Management and Audit Scotland's Performance Audit and Best Value Group.

Exhibit 1: Financial statements audit timetable

Key stage	Date
Meetings with officers to clarify expectations of working papers and financial system reports	31 March 2015
Testing and review of internal control systems and transactions	31 May 2015
Submission of unaudited council financial statements with working papers package	19 June 2015
Planned committee approval of unaudited	25 June 2015
financial statements	(Full Council)
Progress meetings with lead officers on emerging issues	As required
Latest date for final clearance meeting with Director of Finance / Finance Manager, Corporate Budgeting, Taxation and Treasury	14 August 2015
Agreement of unsigned financial statements for Pensions Committee agenda, and issue of combined ISA 260 report to those charged with governance and Annual Audit Report.	15 September 2015
Pension Committee date	24 September 2015
Independent auditor's report signed	24 September 2015

- 23. We will provide an independent auditor's report to members of the Highland Council, as administering body for the Highland Council Pension Fund, and the Accounts Commission that the audit of the financial statements has been completed in accordance with applicable statutory requirements.
- 24. As part of our streamlined audit approach, the Annual Audit Report will be combined with the ISA 260 report this year, and the combined report will be issued by 30 September, one month earlier than previous years. All annual audit reports produced are published on Audit Scotland's website (www.audit-scotland.gov.uk).
- 25. Planned outputs for 2014/15 are summarised at Appendix I.

Quality control

26. International Standard on Quality Control (UK and Ireland) 1 (ISQC1) requires that a system of quality control is established, as part of financial audit procedures, to provide reasonable assurance that professional standards and regulatory and legal requirements are being complied with and that the independent auditor's report or opinion is appropriate in the circumstances. The foundation of our quality framework is our Audit Guide, which incorporates the application of professional auditing, quality and ethical standards and the Code of Audit Practice issued by Audit Scotland and approved by the Accounts Commission.

- 27. To ensure that we achieve the required quality standards, Audit Scotland conducts peer reviews and internal quality reviews and has been subject to a programme of external reviews by the Institute of Chartered Accountants of Scotland (ICAS).
- 28. As part of our commitment to quality and continuous improvement, Audit Scotland will periodically seek your views on the quality of our service provision. We do, however, welcome feedback at any time and this may be directed to the engagement lead, Stephen Boyle.

Independence and objectivity

- 29. Auditors appointed by the Accounts Commission must comply with the Code of Audit Practice. When auditing the financial statements, auditors must also comply with professional standards issued by the Auditing Practices Board and those of the professional accountancy bodies. These standards impose stringent rules to ensure the independence and objectivity of auditors. Audit Scotland has in place robust arrangements to ensure compliance with these standards including an annual "fit and proper" declaration for all members of staff. The arrangements are overseen by the Assistant Auditor General, who serves as Audit Scotland's Ethics Partner.
- 30. Auditing and ethical standards require the appointed auditor to communicate any relationships that may affect the independence and objectivity of audit staff. We are not aware of any pertaining to the audit of the Pension Fund.

Audit issues and risks

Audit issues and risks

31. Based on our discussions with staff, attendance at committee meetings and a review of supporting information, we have identified the following main risk areas for the Highland Council Pension Fund.

Audit risk of material misstatement in financial statements

32. Intercompany accounts: in previous years we have reported that, following the setting up of separate bank accounts for the Pension Fund, processes had not been amended to ensure that all of the Pension Fund's transactions were banked / paid through the Pension Fund's bank accounts. Our 2013/14 audit identified a number of concerns regarding the operation and management of the intercompany accounts used to manage transactions between the council and the Pension Fund which required considerable additional audit input to enable us to agree what revisions were required to the unaudited financial statements. Officers have continued to review their processes for managing and monitoring these accounts during 2014/15. This will remain an area of focus for us as part of our audit of the 2014/15 financial statements.

- 33. Management and supervision of the accounts preparation process: the council's current financial management system is being replaced with effect from 1 Apirl 2015. Implementation of this major project is being managed by the Finance Manager who has taken over responsibility for delivery of the Pension Fund's accounts for the first time this year There is a risk that the Finance Manager will not have sufficient capacity to deliver both the project, and the Pension Fund accounts to the required quality and agreed timescales.
- 34. Management costs: the cost of administering the Local Government Pension Scheme (LGPS) has come under increasingly intense scrutiny in recent years, and in June 2014, CIPFA issued guidance 'Accounting for local government pension scheme management costs' setting out recommended best practice in this area. The Pension Fund plans to adopt this guidance and revise how it discloses management costs within its 2014/15 accounts. We will review the revised disclosures within the 2014/15 accounts.
- 35. Annual governance statement: the revised Local Authority Accounts Regulations require authorities to undertake an annual review of their system of internal control and report this in an annual governance statement. The Pension Fund has previously included a statement on the system of internal financial control instead of a wider annual governance statement within its accounts. We will discuss this new requirement at our planning meeting with officers.

- 36. Management override of controls: ISA 240 requires that audit work is planned to consider the risk of fraud, which is presumed to be a significant risk in any audit. This includes consideration of the risk of management override of controls in order to change the position disclosed in the financial statements. We will test journal entries, review accounting estimates for bias and as part of our audit of the accounts.
- 37. Valuation of private equity investments: the Pension Fund's investment portfolio includes private equity funds which are much more complex to value than independently quoted investments. As private equity funds are a material balance within the pension funds accounts, we have identified the valuation of these funds as a specific risk to our opinion on the financial statements. We will review the approach adopted for valuing these investments and supporting documentation.
- 38. Local Authority Accounts (Scotland) Regulations: as noted in paragraph 19, the audited accounts require to be considered and approved for signature by the Pensions Committee by 30 September. Last year, we were unable to meet the audit timetable set out in our Annual Audit Plan due to delays in responding to audit queries raised and the additional audit work required on intercompany accounts and year end journals. Our audit timetable for completion of the 2014/15 financial statements audit is set out at Exhibit 1.

Audit risk from wider responsibilities under Audit Scotland's Code of Audit Practice

- 39. Pension Reform (LGPS 2015): the Public Service Pension Act 2013 and associated regulations replaces the current final salary scheme with a career average revalued earnings scheme with effect from 1 April 2015. The new scheme is more complex and will require systems and processes to be updated during 2014/15 in preparation for 1 April 2015. We will continue to monitor the Pension Fund's arrangements for the implementation of LGPS 2015.
- 40. Governance arrangements: the Highland Council is the administering authority of the Highland Council Pension Fund. Pensions matters are currently delegated to a Pensions Committee and an Investment Sub-Committee which has responsibility for management and investment of the assets of the Pension Fund. The Public Service Pension Act 2013 Act introduces more prescriptive governace arrangements for pension schemes including the requirement for administering authorities to establish a pensions' board responsible for compliance with legislation and requirements imposed by the Pensions Regulator. We will continue to monitor the council's arrangements for governance of the Pension Fund as part of our 2014/15 audit.

Summary assurance plan

41. In most cases, actions to manage these risks are either planned or already underway within the Highland Council Pension Fund. Details of the sources of assurance that we have received for each of these risks and any audit work we plan to undertake is also set out in Appendix II. In the period prior to the submission of the unaudited financial statements, we will liaise with senior officers on any new or emerging issues.

Fees and resources

Audit fee

- 42. Over the past four years, on a national basis, Audit Scotland has reduced audit fees by 23.5% in real terms, exceeding our 20% target. Due to further refinement of our audit approach we have been able to restrict the increase in audit fees for 2014/15 to 1% which, in real terms, represents a 0.6% reduction at 2014 price levels.
- 43. In determining the audit fee we have taken account of the risk exposure of the Highland Council Pension Fund, the management assurances in place, and the level of reliance we plan to take from the work of internal audit. We have assumed receipt of a complete set of unaudited financial statements and comprehensive working papers package by 19 June 2015.
- 44. The agreed audit fee for the 2014/15 audit of the Highland Council Pension Fund is £48,830. This includes an additional fee of £10,000 in respect of the additional work we required to do to resolve the issues we identified as part of our audit of the 2013/14 financial statements and £5,500 for additional work we will be required to undertake to ensure that these prior year isues have been properly dealt with in 2014/15. Our fee covers:

- the costs of planning, delivering and reporting the annual audit including auditor's attendance at Pension Committee meetings
- the Pension Fund's allocation of the cost of national performance audits and statutory reports by the Accounts Commission
- a contribution towards functions that support the local audit process (e.g. technical support and coordination of the National Fraud Initiative), support costs and auditors' travel and subsistence expenses.
- 45. Where our audit cannot proceed as planned through, for example, late receipt of unaudited financial statements or being unable to take planned reliance from the work of internal audit, a supplementary fee may be levied. An additional fee may also be required in relation to any work or other significant exercises outwith our planned audit activity.

Audit team

46. Stephen Boyle, Assistant Director, Audit Services is your appointed auditor. The local audit team will be led by Maggie Bruce, Senior Audit Manager who will be responsible for day to day management of the audit and who will be your primary contact. Details of the experience and skills of our team are provided in Exhibit 2. The core team will call on other specialist and support staff as necessary.

Exhibit 2: Audit team

Name	Experience
Stephen Boyle BAcc CPFA Assistant Director	Stephen has 18 years experience of public sector finance. He trained as an accountant with a Big 4 firm, before joining Audit Scotland in 2002. He later worked as Head of Finance and Corporate Services for Cube Housing Association, before spending three years with Glasgow Housing Association as Assistant Director of Finance. He re- joined Audit Scotland in June 2013.
Maggie Bruce MA (Hons) CA Senior Audit Manager	Maggie has over 20 years experience of public sector audit with Audit Scotland covering the local government, health and further education sectors. Prior to joining Audit Scotland, Maggie trained as an auditor in the private sector.
Jim Convery MA (Hons) CA CPFA Senior Auditor	Jim has over 25 years experience of public sector audit with Audit Scotland covering the local government, health and further education sectors. Prior to joining Audit Scotland, Jim worked in internal audit in local government and for a private accountancy practice.

Name	Experience
Joni McBride, BSc (Hons) CPFA, Senior Auditor	Joni joined Audit Scotland in 2008 as part of our graduate training programme and qualified in September 2011. Joni has been involved in a range of audits covering local government, central government and health.
Nicholas McShane BAcc (Hons) Professional Trainee	Nicholas joined Audit Scotland in 2012 as a professional trainee and is currently studying for the ICAS accountancy qualification. Prior to joining Audit Scotland, Nicholas was a student at Glasgow University
Lee McDowall, BAcc (Hons), Professional Trainee	Lee joined Audit Scotland in October 2013 as a professional trainee and started studying towards obtaining his ICAS accountancy qualification in the Summer of 2014. Prior to joining Audit Scotland Lee was an Accounting student at the University of Strathclyde.

Appendix I: Planned audit outputs

The diagram below shows the key outputs planned for the Highland Council Pension Fund in 2014/15.



Appendix II: Significant audit risks

We undertake a risk-based audit whereby we focus on those areas where we have identified a risk of material misstatement in the accounts. This section shows how our audit approach focuses on the risks we have identified through our planning procedures. ISA 315 *Identifying and assessing the risks of material misstatement through understanding the entity and its environment* defines a significant risk as "an identified and assessed risk of material misstatement that, in the auditor's judgement, requires special audit consideration."

In this section we identify a range of risks facing the Highland Council Pension Fund, the related source of assurance received and the audit work we propose to undertake to secure additional assurance. The management of risk is the responsibility of the Highland Council Pension Fund and its officers, with the auditor's role being to review the arrangements put in place by management. Planned audit work, therefore, will not necessarily address all residual risks.

Audit Risk	Source of assurance	Assurance procedure	
Audit risk of material misstatement in finan	Audit risk of material misstatement in financial statements		
Intercompany accounts: our 2013/14 audit identified a number of concerns regarding the operation and management of the intercompany accounts used to manage transactions between the council and the Pension Fund which required considerable additional audit input to enable us to agree what revisions were required to the unaudited financial statements.	• the intercompany accounts have been reviewed up to December 2014 with a view to identifying and resolving issues prior to the year end. Plans are in place to share this work with external audit so that any emerging issues can be identified and resolved prior to the preparation of the financial statements.	 early financial statements planning meeting increased audit testing in this area early discussion of emerging issues. 	

Audit Risk	Source of assurance	Assurance procedure
Management and supervision of the accounts preparation process: the council's current financial management system is being replaced with effect from 1 Apirl 2015. Implementation of this major project is being managed by the Finance Manager who has taken over responsibility for delivery of the Pension Fund's accounts for the first time this year There is a risk that the Finance Manager will not have sufficient capacity to deliver both the project, and the Pension Fund accounts to the required quality and agreed timescales.	 the Finance Manager will be involved in the accounts closedown process but, if required, will draw on support from the Head of Servcie and the Finance Manager (Accounts and Central Servcies). 	 early financial statements planning meeting early discussion of emerging issues.
Management costs: the cost of administering the LG PS has come under increasingly intense scrutiny in recent years, and in June 2014, CIPFA issued guidance 'Accounting for local government pension scheme management costs' setting out recommended best practice in this area. The Pension Fund plans to adopt this guidance and revise how it discloses management costs within its 2014/15 accounts.	 management costs will be disclosed in line with the CIPFA gudiacence within the 2014/15 financial statements. Discloures for 2013/14 have been restated to comply with the guidance and this work has been shared with external audit so that emerging issues can be identified and resolved prior to the preparation of the financial statements administration costs are reported against budget to the Pension Committee. 	 early financial statements planning meeting to discuss the CIPFA guidance review of revised disclosures(including prior year comparatives) within the 2014/15 accounts for compliance with the guidance early discussion of emerging issues.

Audit Risk	Source of assurance	Assurance procedure
Annual governance statement: the revised Local Authority Accounts Regulations require authorities to undertake an annual review of their system of internal control and report this in an annual governance statement. The Pension Fund has previously included a statement on the system of internal financial control instead of a wider annual governance statement within its aaccounts.	 an Annual Governance Statement will be included in the unaudited financial statements. This will include the results of Internal Audit's review of the adequacy and effectiveness of the Pension Fund's framework of governance and control as set out in the Head of Audit's Statement on Internal Control. 	 early financial statements planning meeting early discussion of emerging issues.
Management override of controls: as stated in ISA 240, management is in a unique position to perpetrate fraud because of management's ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.	 there is no history of reported fraud within the Pension Fund each year Internal Audit consider and test the adequacy and effectiveness of the Pension Fund's framework of governance and control, including arrangements for the prevention and detection of fraud . 	 detailed testing of journal entries review of accounting estimates for bias evaluating significant transactions that are outside the normal course of business.

Audit Risk	Source of assurance	Assurance procedure
Valuation of private equity investments: the Pension Fund's investment portfolio includes private equity funds which are much more complex to value than independently quoted investments. As private equity funds are a material balance within the pension funds accounts, we have identified the valuation of these funds as a specific risk to our opinion on the financial statements.	 private equity funds will continue to be valued in line with industry standards. 	 review the approach adopted in the valuation of such investments inspect documentation relating to data sources used by the fund
Local Authority Accounts (Scotland) Regulations: as noted in paragraph 19, the audited accounts require to be considered and approved for signature by the Pensions Committee by 30 September. Last year, we were unable to meet the audit timetable set out in our Annual Audit Plan due to delays in responding to audit queries raised and the additional audit work required on intercompany accounts and year end journals.	 officers are aware of the requirements of the new accounting regulations and are planning ahead to ensure full compliance with these early sight of the detailed audit plan will assist the Finance Team meet the new deadlines. 	 early financial statements planning meeting early discussion of emerging issues.

Audit Risk	Source of assurance	Assurance procedure
Audit risk from wider responsibilities under	Audit Scotland's Code of Audit Practice	
Pension Reform (LGPS 2015): the Public Service Pension Act 2013 and associated regulations replaces the current final salary scheme with a career average revalued earnings scheme with effect from 1 April 2015. The new scheme is more complex and will require systems and processes to be updated during 2014/15 in preparation for 1 April 2015.	 the Pensions Team fully understands and is well prepared for the changes to the LGPS. 	 discuss progress and implementation of LGPS 2015 with officers review changes to the pension administration control environment in response to LGPS 2015 data requirements.
Governance arrangements : the Highland Council is the administering authority of the Pension Fund. Pensions matters are currently delegated to a Pensions Committee and an Investment Sub-Committee which has responsibility for management and investment of the assets of the Pension Fund. The Public Service Pension Act 2013 Act introduces more prescriptive governace arrangements for pension schemes including the requirement for administering authorities to establish a pensions' board responsible for compliance with legislation and requirements imposed by the Pensions Regulator.	a report on changes to the Pension Fund's governance arrangements will be presented to the Council in March.	 continue to monitor the arrangements for governance of the Pension Fund