

# Audit strategy

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Shropshire County Pension Fund

Audit 2010/11

**The Audit Commission is an independent watchdog, driving economy, efficiency and effectiveness in local public services to deliver better outcomes for everyone.**

**Our work across local government, health, housing, community safety and fire and rescue services means that we have a unique perspective. We promote value for money for taxpayers, auditing the £200 billion spent by 11,000 local public bodies.**

**As a force for improvement, we work in partnership to assess local public services and make practical recommendations for promoting a better quality of life for local people.**

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# Introduction

## **This plan sets out the audit work that I propose to undertake for the audit of the pension fund financial statements for 2010/11.**

- 1** The plan is based on the Audit Commission's risk-based approach to audit planning, which assesses:
  - current national risks relevant to your local circumstances; and
  - your local risks.
- 2** I will discuss and agree this strategy, and any reports arising from the audit, with those charged with the governance of the pension fund. We have identified the Pension Committee as having ultimate responsibility for receiving, considering and agreeing the audit plans, as well as receiving and considering any reports arising from the audit.
- 3** As your appointed auditor, the audit of the financial statements I deliver to you is governed by International Standards on Auditing (ISAs). These standards prescribe the basic principles and essential procedures, with the related guidance, which govern my professional conduct as your auditor.
- 4** As with all guidance and frameworks, auditing standards are revised and updated, often in a piecemeal fashion. However, in 2009 the auditing profession completed a comprehensive project to improve the clarity of all the ISAs. This is known as the Clarity Project.
- 5** One of the main objectives of the Clarity Project was to promote greater consistency of application between auditors. This has been done by reducing the ambiguity within existing ISAs and improving their overall readability and understandability.
- 6** The new clarified framework will apply to my audit of your 2010/11 financial statements. Because of the new standards, you can expect to see some changes in the way my audit team delivers your audit and the information they seek from you. These changes are highlighted throughout the strategy.
- 7** The audit planning process for 2010/11, including the risk assessment, will continue as the year progresses and the information and fees in this plan will be kept under review and updated as necessary.

# Responsibilities

**The Audit Commission's Statement of Responsibilities of Auditors and of Audited Bodies sets out the respective responsibilities of the auditor and the audited body. The Audit Commission has issued a copy of the Statement to every audited body.**

**8** The Statement summarises where the different responsibilities of auditors and of the audited body begin and end and I undertake my audit work to meet these responsibilities.

**9** I comply with the statutory requirements governing our audit work, in particular:

- the Audit Commission Act 1998; and
- the Code of Audit Practice.

**10** Specifically, the work of auditors on pension fund accounts is defined by the Auditing Practices Board practice note 15 on the audit of pension fund accounts.

# Fee for the audit

**The fee for the audit is £39,625, as indicated in my letter of 14 June 2010.**

**11** In setting the fee, I have assumed that:

- the level of risk in relation to the audit of accounts is consistent with that for 2009/10;
- good quality, accurate working papers are available at the start of the financial statements audit. and
- Internal Audit undertakes appropriate work on the specified material systems and this is available for our review at the end of March 2011.

**12** Based upon the above the Audit Commission scale fee for a multi employer pension fund is £37,238. The fee proposed for 2010/11 is 6.41 per cent per cent above the scale fee and is within the normal level of variation specified by the Commission. Where these assumptions are not met, I will be required to undertake additional work which is likely to result in an increased audit fee. Where this is the case, I will discuss this first with the Interim Head of Finance and I will issue supplements to the plan to record any revisions to the risk and the impact on the fee.

**13** The details of the structure of scale fees are set out in the Audit Commission's work programme and fee scales for 2010/11. Further information on the basis for the fee is also set out in Appendix 1.

## **Specific actions Shropshire County Pension Fund could take to reduce its audit fees**

**14** The Audit Commission requires its auditors to inform audited bodies of specific actions it could take to reduce its audit fees. As in previous years, I will work with staff to identify any specific actions that the Pension Fund could take and to provide ongoing audit support.

# Auditors report on the financial statements

## **I will carry out the audit of the financial statements in accordance with International Standards on Auditing (UK and Ireland) issued by the Auditing Practices Board (APB).**

**15** I am required to issue an audit report giving my opinion on whether the accounts give a true and fair view of the financial position of the Pension Fund as at 31 March 2011.

**16** I am also required to review the pension fund annual report as per the LGPS regulations 1997.

### **Identifying opinion audit risks**

**17** I will apply the concept of materiality in both planning and performing my audit, in evaluating the effect of any identified misstatements, and in forming my opinion.

**18** As part of my audit risk identification process, I need to fully understand the Pension Fund in order to identify any risk of material misstatement (whether due to fraud or error) in the financial statements. I do this by:

- identifying the business risks facing the Pension Fund, including assessing your own risk management arrangements;
- considering the financial performance of the Pension Fund;
- assessing internal control - including reviewing the control environment, the IT control environment and Internal Audit; and
- assessing the risk of material misstatement arising from the activities and controls within the Pension Fund information systems.

### **Identification of specific risks**

**19** I have considered the additional risks that are appropriate to the current opinion audit and have set these out overleaf.

Table 1: **Specific opinion risks identified**

Risk area	Audit response
Ensuring full compliance with the Pension SORP requirements as my 2009/10 audit identified several areas where there was not full compliance with the SORP.	I will complete a review of the 2010/11 Pension Fund accounting statements and supporting notes to ensure compliance with the Pension SORP requirements.
International Accounting Standard (IAS) 26 gives various options for the presentation of the actuarial present value of promised retirement benefits, and the SORP confirms how these are to be applied by administering authorities.	I will review the planned treatment to ensure that it is compliant with the guidance.
Review of the reconciliation processes for gaining assurances over the accuracy of pension payments and membership numbers.	I raised this as an issue in 2009/10 and will follow up the action taken by the Council and Pension Fund in addressing the issues previously raised.
My work in 2009/10 identified variances between the actual and forecast receipts of employee and employer contributions.	I will undertake a review of your reconciliations of contributions receivable to ensure that there are no significant variances. In addition, I will seek assurance from KPMG that there are effective arrangements in place at the Borough of Telford and Wrekin Council to ensure appropriate deductions are being made for pensions contributions.
The Net Asset Statement details unit trusts, hedge funds and derivatives. I will need to secure assurances of the valuations of these investments.	I will ensure that information is obtained from the relevant fund managers as to the basis of their valuation and will undertake reviews of the data to enable me to form a view as to the reasonableness of the valuation.
Potential redundancies in 2010/11 may impact upon the pension fund and I will need to gain assurances as to the appropriateness of the accounting of such transactions.	I will review the elements of the transaction relating to the Pension Fund to ensure that the values have been properly recorded within the Pension Fund accounts.



# Testing strategy

**On the basis of risks identified above I will produce a testing strategy which will consist of testing key controls and/or substantive tests of transaction streams and material account balances at year end.**

**20** I can carry out the testing both before and after the draft financial statements have been produced (pre- and post-statement testing).

**21** Wherever possible, I will complete some substantive testing earlier in the year before the financial statements are available for audit. I have identified the following areas where substantive testing could be carried out early.

- Review of accounting policies.
- Bank reconciliation.
- Contributions.
- Investments – ownership.
- Year-end feeder system reconciliations.

Where I identify other possible early testing, I will discuss it with officers.

**22** Wherever possible, I will seek to rely on the work of Internal Audit to help meet my responsibilities. For 2010/11, I expect to be able to use the results of the following pieces of work.

- Transfers out system review.
- Investment income and expenses system review.
- Testing of accuracy of pension deductions within the payroll system and other bodies where testing is undertaken.
- Review of SAS 70 and AAF 01/06 reports.

**23** I will also seek to rely on the work of other auditors and experts, as appropriate, to meet my responsibilities. For 2010/11, I plan to rely on the work of other auditors in the following areas:

- Accuracy of employee and employer contribution rates at Telford and Wrekin Council (KPMG).

**24** I also plan to rely on the work of the Pension Fund Actuary in the following areas:

- Accuracy of FRS 17 disclosures and basis of assumptions applied.

## ISA Clarity

**25** As well as a greater focus on substantive testing there are a number of other specific changes. These include:

- Journals. ISA (UK&I) 330 (The Auditor's response to assessed risks), requires me to review all material year-end adjustment journals. I had previously sample checked these.
- Related Party Transactions. ISA (UK&I) 550 (Related parties) requires me to review your procedures for identifying related party transactions and obtain an understanding of the controls that you have established to identify such transactions. I will also carry out testing to ensure the related party transaction disclosures you make in the financial statements are complete and accurate. This is a clarification of existing practice.
- Deficiencies in internal control. ISA (UK&I) 265 (Communicating Deficiencies In Internal Control To Those Charged With Governance And Management) is a new standard. It requires that if I identify a deficiency in any of your internal controls during the audit, I will undertake more audit testing to decide whether the deficiency is significant. If I decide the deficiency is significant, I will report it in writing to the Audit and Risk Committee as those charged with governance.

**26** The most noticeable change is to the way I review accounting estimates. ISA (UK&I) 540 (Auditing Accounting Estimates, Including Fair Value Accounting Estimates, And Related Disclosures) requires me to look at your accounting estimates in detail. As part of my audit I will request a list of these from you. I will need to know in particular:

- the process you use to make your accounting estimates;
- the controls you use to identify them;
- whether you use an expert to help you in making the accounting estimates;
- whether any alternative estimates have been discussed and why they have been rejected;
- how you assess the degree of estimation uncertainty (this is the uncertainty arising because the estimate cannot be precise or exact) ;  
and
- the prior year's accounting estimates outcomes, and whether there has been a change in the method of calculation for the current year.

## Key milestones and deadlines

**The Pension Fund is required to prepare its financial statements by 30 June 2011. I am required to complete the audit and issue my opinion by 30 September 2011.**

**27** The key stages in producing and auditing the financial statements are in table 2. I will agree with you a schedule of working papers required to support the entries in the financial statements. The agreed fee is dependent on the timely receipt of accurate working papers.

**28** Every week, during the audit, the audit team will meet with the key contact and review the status of all queries. I can arrange meetings at a different frequency depending on the need and the number of issues arising.

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Table 2: **Proposed timetable**

Activity	Date
Control and early substantive testing	February to April 2011
Receipt of accounts	21 June 2011
Sending audit working papers to the auditor	21 June 2011
Start of detailed testing	21 June 2011
Progress meetings	Weekly
Present report to those charged with governance at the audit committee	15 September 2011
Issue opinion	By 30 September 2011

# The audit team

**Table 3 shows the key members of the audit team for the 2010/11 audit.**

Table 3: **Audit team**

Name	Contact details	Responsibilities
Grant Patterson District Auditor	<a href="mailto:g-patterson@audit-commission.gov.uk">g-patterson@audit-commission.gov.uk</a> 0844 798 7816	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive.
Erik Bagnall Audit Manager	<a href="mailto:e-bagnall@audit-commission.gov.uk">e-bagnall@audit-commission.gov.uk</a> 01743 252941/2	Manages and coordinates the different elements of the audit work. Key point of contact for the Interim Head of Finance.
Johanna Wong Team Leader	<a href="mailto:j-wong@audit-commission.gov.uk">j-wong@audit-commission.gov.uk</a> 01743 252941/2	Co-ordinates different elements of audit work. Day to day contact for Finance staff.

## Independence and objectivity

**29** I am not aware of any relationships that may affect the independence and objectivity of myself as District Auditor or the audit staff, which I am required by auditing and ethical standards to communicate to you.

**30** I comply with the ethical standards issued by the APB and with the Commission's requirements in respect of independence and objectivity as summarised in appendix 2.

## Meetings

**31** The audit team will ensure we have knowledge of your issues to inform our risk-based audit through regular liaison with key officers. Our proposals are set out in appendix 3.

## Quality of service

**32** I aim to provide you with a fully satisfactory audit service. If, however, you are unable to deal with any difficulty through me and my team please contact Chris Westwood, Director of Professional Practice, Audit Practice, Audit Commission, 1st Floor, Millbank Tower, Millbank, London SW1P 4HQ ([c-westwood@audit-commission.gov.uk](mailto:c-westwood@audit-commission.gov.uk)) who will look into any complaint promptly and to do what he can to resolve the position.

**33** If you are still not satisfied you may of course take up the matter with the Audit Commission's Complaints Investigation Officer (The Audit Commission, Westward House, Lime Kiln Close, Stoke Gifford, Bristol BS34 8SR).

## Planned outputs

**34** My team will discuss and agree reports with the right officers before issuing them to the Pension Committee.

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Table 4: **Planned outputs**

Planned output	Indicative date
Annual governance report	15 September 2011
Auditor's report giving an opinion on the financial statements	30 September 2011

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## Appendix 1 Basis for fee

The Audit Commission is committed to targeting its work where it will have the greatest effect, based upon assessments of risk and performance. This means planning work to address areas of risk relevant to our audit responsibilities and reflecting this in the audit fees.

The risk assessment process starts with the identification of the significant financial and operational risks applying to the Pension Fund with reference to:

- my cumulative knowledge of the Pension Fund:
  - planning guidance issued by the Audit Commission;
  - the specific results of previous and ongoing audit work;
- interviews with Pension Fund officers; and
- liaison with Internal Audit.

### Assumptions

In setting the fee, I have assumed that:

- the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2009/10;
- you will inform me of significant developments impacting on the audit;
- Internal Audit meets the appropriate professional standards;
- Internal Audit undertakes appropriate work on specified systems that provide material figures in the financial statements sufficient that I can place reliance for the purposes of our audit;
- you provide:
  - good quality working papers and records to support the financial statements by 13 June 2011;
  - information asked for within agreed timescales;
  - prompt responses to draft reports; and
- there is no allowance for extra work needed to address questions or objections raised by local government electors.

Where these assumptions are not met, I will be required to undertake additional work which is likely to result in an increased audit fee.

## Appendix 2 Independence and objectivity

Auditors appointed by the Audit Commission are required to comply with the Commission's Code of Audit Practice and Standing Guidance for Auditors, which defines the terms of the appointment. When auditing the financial statements, auditors are also required to comply with auditing standards and ethical standards issued by the Auditing Practices Board (APB).

The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.

International Standard on Auditing (UK and Ireland) 260 (Communication of audit matters with those charged with governance) requires that the appointed auditor:

- discloses in writing all relationships that may bear on the auditor's objectivity and independence, the related safeguards put in place to protect against these threats and the total amount of fee that the auditor has charged the client; and
- confirms in writing that the APB's ethical standards are complied with and that, in the auditor's professional judgement, they are independent and their objectivity is not compromised.

The standard defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case, the appropriate addressee of communications from the auditor to those charged with governance is the Pension Fund Committee. The auditor reserves the right, however, to communicate directly with the Council on matters which are considered to be of sufficient importance.

The Commission's Code of Audit Practice has an overriding general requirement that appointed auditors carry out their work independently and objectively, and ensure that they do not act in any way that might give rise to, or could reasonably be perceived to give rise to, a conflict of interest. In particular, appointed auditors and their staff should avoid entering into any official, professional or personal relationships which may, or could reasonably be perceived to, cause them inappropriately or unjustifiably to limit the scope, extent or rigour of their work or impair the objectivity of their judgement.

The Standing Guidance for Auditors includes a number of specific rules.

The key rules relevant to this audit appointment are as follows.

- Appointed auditors should not perform additional work for an audited body (ie work over and above the minimum required to meet their statutory responsibilities) if it would compromise their independence or might give rise to a reasonable perception that their independence could be compromised. Where the audited body invites the auditor to carry out risk-based work in a particular area that cannot otherwise be justified as necessary to support the auditor's opinion and conclusions, it should be clearly differentiated within the Audit and Inspection Plan as being 'additional work' and charged for separately from the normal audit fee.
- Auditors should not accept engagements that involve commenting on the performance of other auditors appointed by the Commission on Commission work without first consulting the Commission.
- The District Auditor responsible for the audit should, in all but the most exceptional circumstances, be changed at least once every seven years, with additional safeguards in the last two years.
- The District Auditor and senior members of the audit team are prevented from taking part in political activity on behalf of a political party, or special interest group, whose activities relate directly to the functions of local government or NHS bodies in general, or to a particular local government or NHS body.

The District Auditor and members of the audit team must abide by the Commission's policy on gifts, hospitality and entertainment.



# Appendix 3 Working together

## Meetings

The audit team will ensure we have knowledge of your issues to inform our risk-based audit through regular liaison with key officers.

My proposal for the meetings is as follows.

Table 5: **Proposed meetings with officers**

Council officers	Audit Commission staff	Timing	Purpose
Head of Finance	AM and Team Leader (TL)	Six weekly meetings	General update plus: <ul style="list-style-type: none"><li>■ February - audit plan.</li><li>■ July - September - accounts progress.</li><li>■ September - annual governance report.</li></ul>
Pension Committee	DA and AM, with TL as appropriate	As determined by the Committee	Formal reporting of: <ul style="list-style-type: none"><li>■ Audit Plan.</li><li>■ Annual governance report.</li><li>■ Other issues as appropriate.</li></ul>

## Sustainability

**35** The Audit Commission is committed to promoting sustainability in our working practices and I will actively consider opportunities to reduce our impact on the environment. This will include:

- reducing paper flow by encouraging you to submit documentation and working papers electronically;
- use of video and telephone conferencing for meetings as appropriate; and
- reducing travel.

## Appendix 4 Glossary

### **Audit of the accounts**

The audit of the accounts of an audited body comprises all work carried out by auditors in accordance with the Code to meet their statutory responsibilities under the Audit Commission Act 1998.

### **Audited body**

A body to which the Audit Commission is responsible for appointing the external auditor, comprising both the members of the body and its management (the senior officers of the body). Those charged with governance are the members of the audited body. (See also 'Members' and 'Those charged with governance'.)

### **Auditing Practices Board (APB)**

The body responsible in the UK for issuing auditing standards, ethical standards and other guidance to auditors. Its objectives are to establish high standards of auditing that meet the developing needs of users of financial information and to ensure public confidence in the auditing process.

### **Auditing standards**

Pronouncements of the APB, which contain basic principles and essential procedures with which auditors are required to comply, except where otherwise stated in the auditing standard concerned.

### **Auditor(s)**

Auditors appointed by the Audit Commission.

### **Code (the)**

The Code of Audit Practice.

### **Commission (the)**

The Audit Commission for Local Authorities and the National Health Service in England.

### **Ethical Standards**

Pronouncements of the APB that contain basic principles that apply to the conduct of audits and with which auditors are required to comply, except where otherwise stated in the standard concerned.

## **Financial statements**

The annual statement of accounts or accounting statements that audited bodies are required to prepare, which summarise the accounts of the audited body, in accordance with regulations and proper practices in relation to accounts.

## **Internal control**

The whole system of controls, financial and otherwise, that is established in order to provide reasonable assurance of effective and efficient operations, internal financial control and compliance with laws and regulations.

## **Materiality (and significance)**

The APB defines this concept as ‘an expression of the relative significance or importance of a particular matter in the context of the financial statements as a whole. A matter is material if its omission would reasonably influence the decisions of an addressee of the auditor’s report; likewise a misstatement is material if it would have a similar influence. Materiality is not capable of general mathematical definition, as it has both qualitative and quantitative aspects’.

## **Those charged with governance**

Those charged with governance are defined in auditing standards as ‘those persons entrusted with the supervision, control and direction of an entity’.

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The Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission explains the respective responsibilities of auditors and of the audited body. Reports prepared by appointed auditors are addressed to non-executive directors, members or officers. They are prepared for the sole use of the audited body. Auditors accept no responsibility to:

- any director/member or officer in their individual capacity; or
- any third party.



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