

The Audit Plan for Shropshire County Pension Fund

Year ended 31 March 2014

April 2014

Grant Patterson

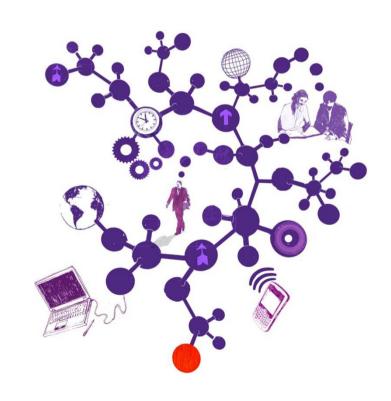
Engagement Lead T 0121 232 5296 E grant.b.patterson@uk.gt.com

Ashley Wilson

Manager
T 0121 232 5430
E ashley.l.wilson@uk.gt.com

Johanna Wong

Executive T 0121 232 5262 E johanna.wong@uk.gt.com



The contents of this report relate only to the matters which have come to our attention,
which we believe need to be reported to you as part of our audit process. It is not a
comprehensive record of all the relevant matters, which may be subject to change, and in
particular we cannot be held responsible to you for reporting all of the risks which may affect
the Fund or any weaknesses in your internal controls. This report has been prepared solely
for your benefit and should not be quoted in whole or in part without our prior written
consent. We do not accept any responsibility for any loss occasioned to any third party acting,
or refraining from acting on the basis of the content of this report, as this report was not
prepared for, nor intended for, any other purpose.

Contents

Se	ection	Pag
1.	Understanding your business	4
2.	Developments relevant to your Pension Fund and the audit	!
3.	Our audit approach	(
4.	Significant risks identified	
5.	Other risks	:
6.	Results of interim work	10
7.	Logistics and our team	1
8.	Fees and independence	12
9.	Communication of audit matters with those charged with governance	1:

Understanding your business

In planning our audit we need to understand the challenges and opportunities the Pension Fund is facing. We set out a summary of our understanding below.

Challenges/opportunities

1. LGPS 2014

- The Public Service Pensions Act 2013 (the Act) and associated regulations replaces the current final salary scheme to a career average revalued earnings scheme (LGPS 2014) alongside other important provisions.
- Under the new scheme, it will become more complex requiring changes to systems and processes.

2. New governance arrangements

- The Act requires changes to governance arrangements, including that each scheme appoints a Scheme Manager who will be assisted by a Pension Board.
- DCLG has consulted on these and final regulations are expected in Autumn 2014 with implementation expected by April 2015 at the latest.

3. The Pensions Regulator

- The Act also provides for The Pensions Regulator (TPR) to oversee the operation of LGPS schemes and set standards of governance and administration.
- The Fund will need to monitor compliance with requirements set by TPR.

4. Administration costs/ structural change

- The DCLG has communicated its intention to consult on the future structure of the LGPS to improve efficiency and performance.
- LGPS management expenses are increasingly under scrutiny – in response CIPFA intend to issue guidance on reporting these in 2014.









Our response

- We will discuss with officers progress and implementation of LGPS 2014.
 Where appropriate, we will report any observations on implementation from 1 April 2014.
- As part of our 2014/15 audit we will consider changes to the pensions administration control environment in response to LGPS 2014 data requirements.
- We will consider the Pension Fund's revised governance arrangements as they develop and share good practice on emerging new arrangements.
- We will share our experience, as needed, of working with The Pensions Regulator as the Pension Fund prepares for a new regulatory regime.
- From 1 April 2015, we will consider our reporting responsibilities to The Pensions Regulator. We will discuss any draft reports with officers and the Pensions Committee before their issue.
- We will share good practice in reducing administration costs through collaboration or other initiatives.
- Once issued, we will consider the CIPFA guidance and discuss with officers.
- We will discuss any proposals for structural change and their impact on the Pension Fund with officers.

Developments relevant to your Pension Fund and the audit

In planning our audit we also consider the impact of key developments in the sector and take account of national audit requirements as set out in the Code of Audit Practice and associated guidance.

Developments and other requirements

1. Financial reporting

There are no significant changes to the Pension Fund financial reporting framework as set out in the CIPFA Code of Practice for Local Authority Accounting (the Code) for the year ending 31 March 2014.

2. LGPS 2014

Planning and implementation of the Career Average Re-valued Earnings scheme (CARE), effective from 1 April 2014, will impact on the workload of the pensions administration team. This alongside, further developments in relation to governance may impact on their capacity to respond to audit queries.

3. Triennial valuation

Following the 31 March 2013 actuarial valuation the Council is in the process of considering the level of additional employer deficit contributions required and how to fund them.

4. Financial Pressures - Pension fund

- Nationally, pension funds are increasingly disinvesting from investment assets to fund cash flow demands on benefit and leaver payments that are not covered by contributions and investment income. Pension fund investment strategies need to be able to respond to these demands as well as the changing nature of investment markets.
- Local government is increasingly looking at alternative delivery models for services. This may lead to increasing numbers of admitted bodies into LGPS funds. These bodies have inherently higher covenant risks and potentially increased risks for the fund in the event of them failing.

Our response

We will ensure that the Pension Fund financial statements comply with the requirements of the Code through our substantive testing.

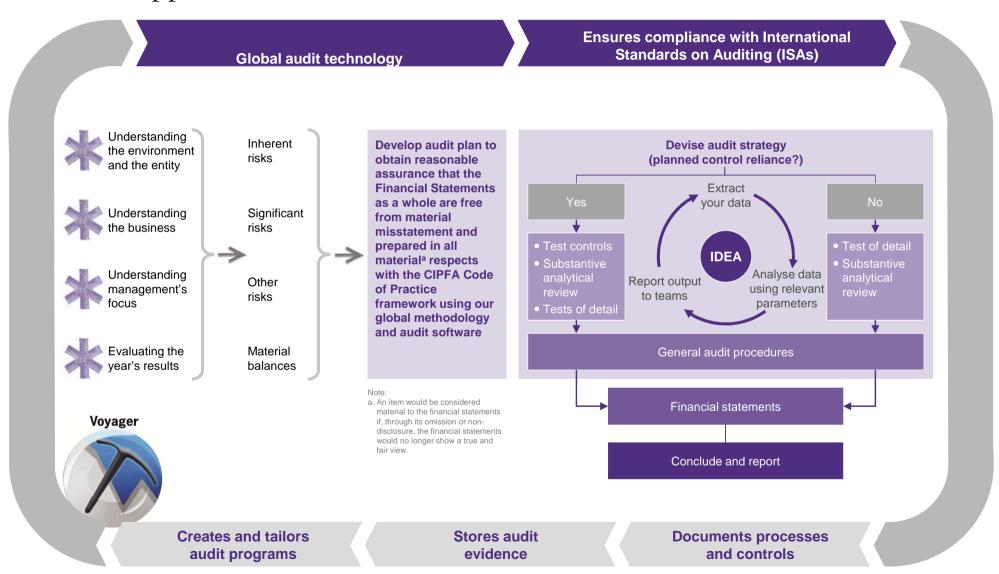
We will plan our audit and agree

We will plan our audit and agree timetables with officers to ensure that the audit of the Pension Fund causes minimal disruption to officers. We will maintain regular dialogue with management to assess the impact this has on the administration of the pension fund and any required disclosures in the 2013/14 Pension Fund financial statements.

5

- We will monitor any changes to the Pension Fund investment strategy through our regular meetings with management. We acknowledge the Pension Fund anticipates no short term need to disinvest to fund payments.
- We will consider the impact of changes on the nature of investments held by the Pension Fund and adjust our testing strategy as appropriate.
- Through our regular liaison with officers we will consider the impact of any planned large scale TUPE transfers of staff and the effect on the pension fund.

Our audit approach



Significant risks identified

'Significant risks often relate to significant non-routine transactions and judgemental matters. Non-routine transactions are transactions that are unusual, either due to size or nature, and that therefore occur infrequently. Judgemental matters may include the development of accounting estimates for which there is significant measurement uncertainty' (ISA 315).

In this section we outline the significant risks of material misstatement which we have identified. There are two presumed significant risks which are applicable to all audits under auditing standards (International Standards on Auditing (ISAs)) which are listed below:

Significant risk	Description	Substantive audit procedures
Revenue	Under ISA 240 there is a presumed risk that revenue may be misstated due to the improper recognition of revenue.	 We have rebutted this presumption and therefore do not consider this to be a significant risk for Shropshire County Pension Fund since: The nature of the Pension fund's revenue is in many respects relatively predictable and does not generally involve cash transactions. The split of responsibilities between the Pension Fund, its Fund Managers and the Custodian provides a clear separation of duties reducing the risk around investment income. Employee contributions are made by direct salary deductions and direct bank transfers from admitted /scheduled bodies and are supported by separately sent schedules. They are directly attributable to gross pay making any improper recognition unlikely. Transfers into the scheme are all supported by an independent actuarial valuation of the amount which should be transferred, which is subject to agreement between the transferring and receiving funds.
Management over-ride of controls	Under ISA 240 there is a presumed risk that the risk of management over-ride of controls is present in all entities.	 Work planned: Review of accounting estimates, judgements and decisions made by management Testing of journal entries Review of unusual significant transactions

7

Other risks

The auditor should evaluate the design and determine the implementation of the entity's controls, including relevant control activities, over those risks for which, in the auditor's judgment, it is not possible or practicable to reduce the risks of material misstatement at the assertion level to an acceptably low level with audit evidence obtained only from substantive procedures (ISA 315).

In this section we outline the other risks of material misstatement which we have identified as a result of our planning.

Other reasonably possible risks	Description	Planned audit procedure
Investments	Investments not valid Investments activity not valid Alternative Investments not valid* Fair value measurement not correct	We will review the reconciliation of information provided by the fund managers, the custodian and the Pension Fund's own records and seek explanations for any variances. The existence of investments will be confirmed directly with independent custodians or by agreement to relevant documentation.
Benefit Payments	Benefits improperly computed/claims liability understated	We will select a sample of individual pensions in payment (new and existing), lump sum benefits and refunds and test them by reference to member files. We will rationalise pensions paid with reference to changes in pensioner numbers and increases applied in the year together with comparing pensions paid on a monthly basis to ensure that any unusual trends are satisfactorily explained.

8

Other risks

The auditor should evaluate the design and determine the implementation of the entity's controls, including relevant control activities, over those risks for which, in the auditor's judgment, it is not possible or practicable to reduce the risks of material misstatement at the assertion level to an acceptably low level with audit evidence obtained only from substantive procedures (ISA 315).

Other reasonably possible risks	Description	Planned audit procedure
Contributions	Recorded contributions not correct	We will rationalised contributions received with reference to changes in member body payrolls and numbers of contributing pensioners to ensure that any unexpected trends are satisfactorily explained.
Member Data	Member data not correct	We will confirm the system of controls and reconciliations covering the determination of member eligibility, the input of evidence into the Pensions Administration System and the maintenance of member records. With a view to reducing the level of substantive testing required, we will then consider testing key controls in these areas. We will reconcile membership numbers for each category of member to previous year's figures via retirements, leavers and starters.

9

Results of interim audit work

The findings of our interim audit work, and the impact of our findings on the accounts audit approach, are summarised in the table below:

	Work performed and findings	Conclusion
Internal audit	We have reviewed internal audit's overall arrangements in accordance with auditing standards. Our work has not identified any issues which we wish to bring to your attention. We also reviewed internal audit's work on the Pension Fund's systems to date. We have not identified any significant weaknesses impacting on our responsibilities.	Overall, we have concluded that the internal audit service continues to provide an independent and satisfactory service to the Pension Fund and that internal audit work contributes to an effective internal control environment at the Council. Our review of internal audit work has not identified any weaknesses which impact on our audit approach.
Walkthrough testing	We have completed walkthrough tests of controls operating in areas where we consider that there is a risk of material misstatement to the financial statements. Our work has not identified any issues which we wish to bring to your attention. Internal controls have been implemented in accordance with our documented understanding.	Our work has not identified any weaknesses which impact on our audit approach.
Review of information technology controls	Our information systems specialist a will performed a high level review of the Council's general IT control environment, as part of the overall review of the internal controls system. This will also include a follow up of the issues that were raised last year.	Our work will be reported when complete.
Journal entry controls	We will review the Pension Fund's journal entry policies and procedures as part of determining our journal entry testing strategy. We will complete journals testing as part of our final accounts audit and report any material weaknesses identified, which could adversely impact on the Pension Fund's control environment or financial statements.	Our work will be reported when complete.

Logistics and our team



Grant Patterson Director T 0121 232 5296 E grant.b.patterson@uk.gt.com Ashley Wilson Audit Manager T 0121 232 5430 E ashley.l.wilson@uk.gt.com Johanna Wong Executive T 0121 232 5262 E johanna.wong@uk.gt.com

Date	Activity
March/April 2014	Planning
March 2014	Interim site visit
June 2014	Presentation of the Audit Plan to the Pensions Committee
July/August 2014	Year end fieldwork
August 2014	Audit Findings clearance meeting with James Walton and Justin Bridges
September 2014	Presentation of the Audit Findings to Pensions Committee and Audit Committee
September 2014	Opinion issued

Fees and independence

Fees

	£
Pension Fund Scale Fee	23,427
Proposed fee variation – IAS 19 Assurances	1,979
Proposed fee variation – Repayment of the element of 2012/13 fee to meet costs of work by KPMG to be recharged to the Council	(2,976)
Proposed fee payable	22,430

Proposed fee variation

IAS 19 Assurances

In line with Audit Commission standing guidance we are required to provide assurance to admitted body auditors over the reliability of the information provided by the Pension Fund to the actuary for the purposes of them making their IAS 19 estimates. As in the previous year the Audit Commission has confirmed that this work is not currently included in the scale fee and therefore a fee variation is proposed to cover the cost of the work required by the admitted bodies.

Repayment KPMG

In 2012/13 KPMG completed controls testing on our behalf at an admitted body. This variation to ensure the charge has a neutral impact on the overall fees charged.

Fees for other services

Service	£
None	Nil

Our fee assumptions include:

- Our fees are exclusive of VAT
- Supporting schedules to all figures in the accounts are supplied by the agreed dates and in accordance with the agreed upon information request list
- The scope of the audit, and the Pension Fund and its activities have not changed significantly
- The Pension Fund will make available management and accounting staff to help us locate information and to provide explanations

Independence and ethics

12

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Auditing Practices Board's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.

Full details of all fees charged for audit and non-audit services will be included in our Audit Findings report at the conclusion of the audit.

We confirm that we have implemented policies and procedures to meet the requirement of the Auditing Practices Board's Ethical Standards

Communication of audit matters with those charged with governance

International Standards on Auditing (ISA) 260, as well as other ISAs, prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table opposite.

This document, the Audit Plan, outlines our audit strategy and plan to deliver the audit, while the Audit Findings will be issued prior to approval of the financial statements and will present key issues and other matters arising from the audit, together with an explanation as to how these have been resolved.

We will communicate any adverse or unexpected findings affecting the audit on a timely basis, either informally or via a report to those charged with governance.

Respective responsibilities

This plan has been prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission (www.audit-commission.gov.uk).

We have been appointed as the Council and Pension Fund's independent external auditors by the Audit Commission, the body responsible for appointing external auditors to local public bodies in England. As external auditors, we have a broad remit covering finance and governance matters.

Our annual work programme is set in accordance with the Code of Audit Practice (the Code) issued by the Audit Commission and includes nationally prescribed and locally determined work. Our work considers the Pension Fund's key risks when reaching our conclusions under the Code.

The audit of the Pension Fund's financial statements does not relieve management or those charged with governance of their responsibilities.

Our communication plan	Audit plan	Audit findings
Respective responsibilities of auditor and management/those charged with governance	✓	
Overview of the planned scope and timing of the audit. Form, timing and expected general content of communications	✓	
Views about the qualitative aspects of the entity's accounting and financial reporting practices, significant matters and issue arising during the audit and written representations that have been sought		✓
Confirmation of independence and objectivity	✓	✓
A statement that we have complied with relevant ethical requirements regarding independence, relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and	✓	√
network firms, together with fees charged.		
Details of safeguards applied to threats to independence		
Material weaknesses in internal control identified during the audit		✓
Identification or suspicion of fraud involving management and/or others which results in material misstatement of the financial statements		✓
Non compliance with laws and regulations		✓
Expected modifications to the auditor's report, or emphasis of matter		✓
Uncorrected misstatements		✓
Significant matters arising in connection with related parties		✓
Significant matters in relation to going concern		✓



© 2014 Grant Thornton UK LLP. All rights reserved.

'Grant Thornton' means Grant Thornton UK LLP, a limited liability partnership.

Grant Thornton is a member firm of Grant Thornton International Ltd (Grant Thornton International). References to 'Grant Thornton' are to the brand under which the Grant Thornton member firms operate and refer to one or more member firms, as the context requires. Grant Thornton International and the member firms are not a worldwide partnership. Services are delivered independently by member firms, which are not responsible for the services or activities of one another. Grant Thornton International does not provide services to clients.

grant-thornton.co.uk