

The Audit Plan for Shropshire County Pension Fund

Year ended 31 March 2015

25 February 2015

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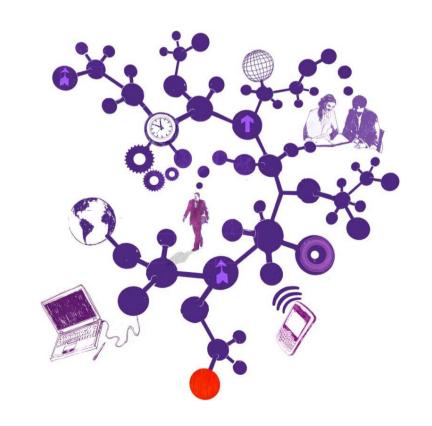
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which we believe need to be reported to you as part of our audit process. It is not a
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prepared for, nor intended for, any other purpose.

Contents

Section

- 1. Understanding your business
- 2. Developments relevant to your business and the audit
- 3. Our audit approach
- 4. Significant risks identified
- 5. Other risks
- 6. Results of interim work
- 7. Key dates
- 8. Fees and independence
- 9. Communication of audit matters with those charged with governance

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. New governance arrangements

- The new governance regulations have introduced further changes for LGPS which take effect from April 2015. These introduce a Local Pension Board for each fund. These boards will work with the administering authority to help ensure compliance and effective governance and administration of the scheme. In addition the regulations also establish a National Scheme Advisory Board and a funding cap.
- There is a potential for overlap for many schemes between existing Pension Committees and the new Local Pension Boards, with a real challenge for administering authorities to meet the statutory requirements, but in a way which delivers visible improvements in the governance of the funds.

2. Pensions Regulator

- The Public Services Pension Act also provides for the extension of the work of The Pensions Regulator to the LGPS from 1 April 2015.
- The Fund will need to monitor compliance with requirements set by the regulator.

3. Future structural reform

- In May 2014 DCLG consulted on the opportunities for collaboration, cost savings and efficiencies in the management of LGPS funds. While the outcome of this is still awaited there is clearly a growing momentum for structural change.
- In the meantime the growing use of shared arrangements is delivering real benefits to funds through reduced costs, increasing access to relevant expertise and improved quality.

4. Local government outsourcing

- As many councils look to outsourcing and the set up of external organisations as a more cost effective way to provide services, the impact on the LGPS fund needs to be considered.
- Funds need to carefully consider requests for admission to the scheme and where possible mitigate any risks to the fund.
- An increased number of admitted bodies may increase the risks for the fund in the event of those bodies failing. It is also likely to increase the administration costs of the scheme overall.

Our response

- We will continue our on-going dialogue with officers around their governance arrangements.
- We will share good practice that is emerging with officers.
- We will share our experience of working with The Pensions Regulator.
- We will discuss with officers any changes that have been made to existing practices for the fund to demonstrate compliance.
- We will share good practice in reducing administration costs through collaboration or other initiatives.
- We will discuss any proposals for structural change and their impact on the Pension Fund with officers.
- 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.

Developments relevant to your business 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 ('the code') and associated guidance.

Developments and other requirements

1. LGPS 2014

- During 2013/14 funds have implemented LGPS 2014. This has moved LGPS from a final salary scheme to a career average scheme one year ahead of other public sector schemes.
- Under this new scheme, the calculations of benefits are likely to be more complex, as are the arrangements for ensuring the correct payment of contributions.
- LGPS 2014 has put a greater emphasis on the employer providing detailed information to the scheme administrator, while also requiring the scheme to have enhanced information systems in place to maintain and report on this data.

2. 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 2015, however the Pension Fund needs to ensure on-going compliance with the Code.

3. Financial Pressures

- 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 the investment markets.
- We are aware that your fund has had to use some cash balances to cover some elements of benefit payments, but have not had to disinvest from assets held.

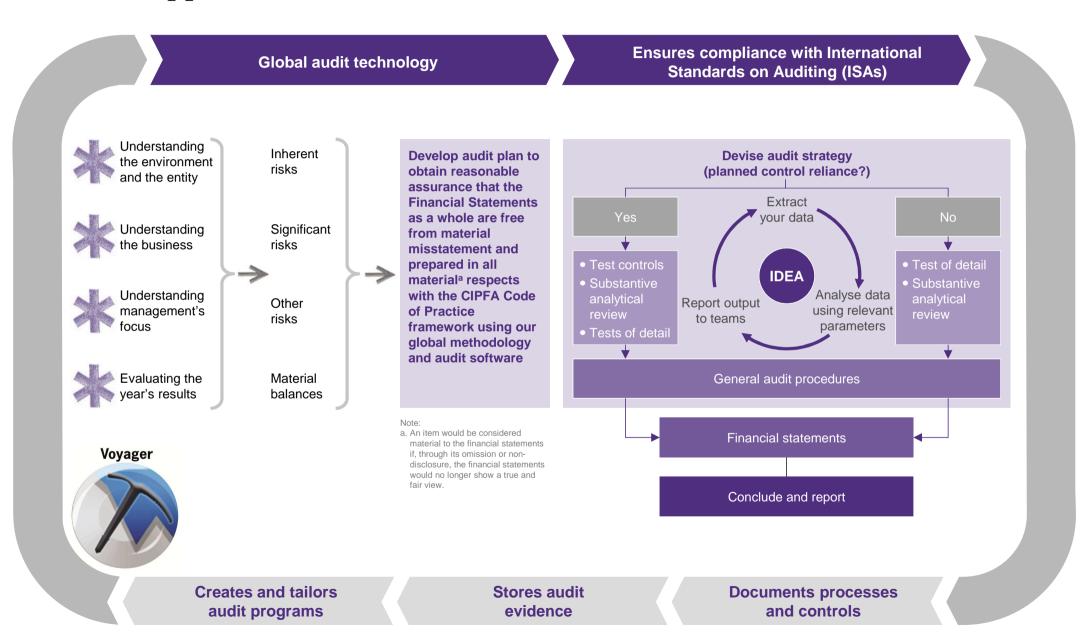
4. Accounting for Fund management costs

- The Code's only requirement for the disclosure of the costs of managing the pension fund is that management costs in relation to a retirement benefit plan are disclosed on the face of the fund account.
- CIPFA have recently produced guidance aimed at improving the transparency of management cost data and have suggested that funds should include in the notes to the accounts a breakdown of those management costs across the areas of investment management expenses, administration expenses and oversight and governance costs.

Our response

- We will consider changes made to the pensions administration control environment in response to LGPS data requirements, and
- we will review and test controls over contributions and benefits.
- We will ensure that the Pension Fund financial statements comply with the requirements of the Code through our substantive testing.
- We will monitor any changes to the Pension Fund investment strategy through our regular meetings with management.
- We will consider the impact of changes on the nature of investments held by the Pension Fund and adjust our testing strategy as appropriate.
- We will discuss with officers any planned changes to the financial statements in response to this guidance.

Our audit approach



Significant risks identified

'Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, either due to size or nature, and that therefore occur infrequently. Judgmental 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
The revenue cycle includes fraudulent transactions	Under ISA 240 there is a presumed risk that revenue may be misstated due to the improper recognition of revenue. This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.	Having considered the risk factors set out in ISA240 and the nature of the revenue streams at Shropshire County Pension Fund, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because: • there is little incentive to manipulate revenue recognition • opportunities to manipulate revenue recognition are very limited • the culture and ethical frameworks of local authorities, including Shropshire Council who act as the administrators of the pension fund, mean that all forms of fraud are
		seen as unacceptable.
Management over-ride of controls	Under ISA 240 the presumption that the risk of management over-ride of controls is present in all entities.	 Audit work planned: Review of accounting estimates, judgments and decisions made by management Testing of journal entries Review of unusual significant transactions

Significant risks identified cont'd

Significant risk	Description	Substantive audit procedures
Level 3 Investments – Valuation is incorrect Level 3 investment are those where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data.	Under ISA 315 significant risks often relate to significant non-routine transactions and judgemental matters. Level 3 investments by their very nature require a significant degree of judgement to reach an appropriate valuation at year end.	 Work completed to date: We have discussed with officers investment strategy for the fund which has indicated no change is expected in the overall split between level 1,2 and 3 investments held at the year-end. Further work planned: We will perform walkthrough tests of key controls identified in for this system. For a sample of investments, test valuations by obtaining and reviewing audited accounts at latest date for individual investments and agreeing these to the fund manager reports at that date. Reconciliation of those values to the values at 31st March with reference to known movements in the intervening period. 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 variances The existence of investments will be confirmed directly with independent custodians or by agreement to relevant documentation. To review the nature and basis of estimated values.

Other risks identified

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 risks	Description	Audit Approach
Investment Income	Investment activity not valid. Investment income not accurate. (Accuracy)	 Audit work planned: We will perform walkthrough tests of key controls identified for this cycle. 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 variances. The existence of investments will be confirmed directly with independent custodians or by agreement to relevant documentation.
Investment purchases and sales	Investment activity not valid. Investment valuation 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 variances

Other risks identified continued

Other risks	Description	Audit Approach
Investment values – Level 2 investments	Valuation is incorrect. (Valuation net)	Audit work planned:
Level 2 investments are those where		 We will update our understanding of the cycle with relevant personnel from the team during the interim audit.
quoted market prices are not available; for example, where an instrument is		We will perform walkthrough tests of key controls identified for this cycle.
traded in a market that is not considered to be active, or where valuation		 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 variances
techniques are used to determine fair value.		The existence of investments will be confirmed directly with independent custodians or by agreement to relevant documentation.
Contributions	Recorded contributions not correct (Occurrence)	Audit work planned:
		 We will update our understanding of the cycle with relevant personnel from the team during the interim audit.
		We will perform walkthrough tests of the controls identified in this cycle.
		 We will discussed with internal audit their work completed in this area and seek to minimise the level of testing we undertake in this area.
		We will sample test controls testing over the contributions made to the fund.
		 Test a sample of contributions to source data to gain assurance over their accuracy and occurrence.
		 Rationalise contributions received with reference to changes in member body payrolls and numbers of contributing pensioners to ensure that any unexpected trends are satisfactorily explained.
Benefits payable	Benefits improperly computed/claims	Audit work planned:
	liability understated (Completeness, accuracy and occurrence)	 We will update our understanding of the cycle with relevant personnel from the team during the interim audit.
		We will perform walkthrough tests of key controls identified for this cycle.
		Controls testing over, completeness, accuracy and occurrence of benefit payments,
		Test a sample of individual pensions in payment by reference to member files,
		 We will rationalise pensions paid with reference to changes in pensioner numbers and increases applied in the year to ensure that any unusual trends are satisfactorily explained.

Other risks identified continued

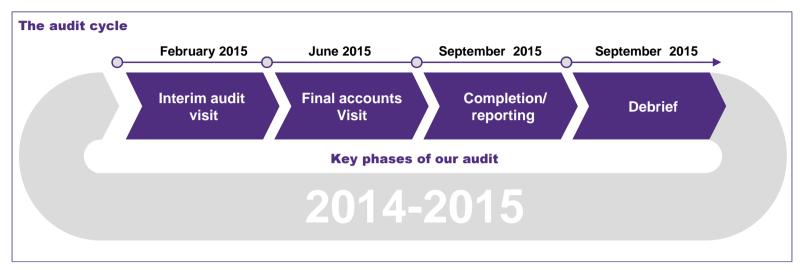
Other risks	Description	Audit Approach
Member Data	Member data not correct. (Rights and Obligations)	Audit work planned:
		We will update our understanding of this cycle with relevant personnel from the team during the interim audit.
		We will perform walkthrough tests of the controls identified in the cycle.
		We will perform controls testing over new enrolments to the pension scheme.
		Controls testing over annual/monthly reconciliations and verifications with individual members
		Sample testing of changes to member data made during the year to source documentation

Plan of interim audit work

	Work planned
Internal audit	We will carry out a high level review of internal audit's overall arrangements.
Walkthrough testing	We will carry out a walkthrough test of controls operating in areas where we consider that there is a risk of material misstatement to the financial statements.
Entity level controls	We will obtain an understanding of the overall control environment relevant to the preparation of the financial statements including:
	Communication and enforcement of integrity and ethical values
	Commitment to competence
	Participation by those charged with governance
	Management's philosophy and operating style
	Organisational structure
	Assignment of authority and responsibility
	Human resource policies and practices
Review of information technology controls	We will perform a high level review of the general IT control environment, as part of the overall review of the internal controls system.
Journal entry controls	We will review the Pension Fund's journal entry policies and procedures as part of determining our journal entry testing strategy and have not identified any material weaknesses which are likely to adversely impact on the Fund's control environment or financial statements.

The plan for our interim audit work is noted above, the impact of our findings may impact on the accounts audit approach and we will issue an update to this plan, if required, following our interim work.

Key dates



Date	Activity
January 2015	Planning
February 2015	Interim site visit
March 2015	Presentation of audit plan to Pensions Fund Committee
June/July 2015	Year end fieldwork
August 2015	Audit findings clearance meeting with appropriate officers
September 2015	Report audit findings to those charged with governance being the Pensions Fund Committee
By 29 September 2015	Sign financial statements opinion

Fees and independence

Fees

	£
Pension Fund Scale Fee	23,427
Proposed fee variation – IAS 19 Assurances	1,979
Total fees (excluding VAT)	25,406

Our fee assumptions include:

- 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, the Fund, and its activities, have not changed significantly
- The Fund will make available management and accounting staff to help us locate information and to provide explanations

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 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.

Fees for other services

Service	Fees £
None	Nil

Fees for other services

Fees for other services reflect those agreed at the time of issuing our Audit Plan. Any changes will be reported in our Audit Findings Report and Annual Audit Letter.

Independence and ethics

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 the Council.

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'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 Council's key risks when reaching our conclusions under the Code.

It is the responsibility of the Council to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Council is fulfilling these 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		✓



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