

# Audit opinion plan

Kent 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 2010/11 financial statements.**

**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 plan and any reports arising from the audit, with the Superannuation Fund Committee. However, as the pension fund accounts remain part of the financial statements of Kent County Council as a whole, and overall responsibility lies with those charged with governance, the Governance and Audit Committee, they will retain ultimate responsibility for receiving, considering and agreeing the audit plans, as well as receiving and considering any reports arising from the audit.

## **Responsibilities**

**3** 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.

**4** 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.

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

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

**6** 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 indicative fee for the audit is £50,000.**

**7** The fee for the audit is £50,000, as indicated in my letter of 7 June 2010 and approved by the Governance and Audit Committee at the meeting of 30 June 2010.

**8** 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 as agreed for the pension fund material systems and this is available for review by 30 April 2011.

**9** 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 Acting Director of Finance and I will issue supplements to the plan to record any revisions to the risk and the impact on the fee.

**10** Further information on the basis for the fee is set out in appendix 1.

# 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).**

**11** 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 Kent Pension Fund as at 31 March 2011.

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

### **Materiality**

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

### **Identifying opinion audit risks**

**14** I need to understand fully the audited body 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

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

Table 1: **Specific risks**

Specific opinion risks identified

Risk area	Audit response
<p><b>International Financial Reporting Standards</b></p> <p>The pension fund statements will have to reflect for the first time the requirements of International financial reporting standards.</p>	<p>I will consider the work the Authority has performed to date and will review the accounting treatment and revised accounting policies for the areas affected by IFRS, including restated 2009/10 balances.</p>
<p><b>Pension fund bank account</b></p> <p>As of 1 April 2011 the pension fund has to have a separate bank account from the County Council to record all of its income and expenditure. The Council transferred the cash held on behalf of the Pension Fund on 1 July 2010. There is a risk that the Fund fails to recognise income or expenditure or double count transactions.</p>	<p>I will review the transfer process completed during the year as part of documenting the bank system. I will test the year end bank account reconciliation.</p>
<p><b>Actuary's assumptions</b></p> <p>Barnett Waddingham is carrying out a full triennial valuation as at 1 April 2010. We are aware that different assumptions will be used from the previous actuarial valuation which may give rise to a material change to the Pension Fund's liabilities.</p>	<p>I will review and test the reasonableness of the assumptions made by the actuary in the triennial valuation. I will review the note in the financial statements and annual report to ensure the guidance is followed.</p>
<p><b>Valuation of freehold property</b></p> <p>The accounting for freehold property is a material accounting estimate. The portfolio is managed by DTZ and was valued by Colliers CRE at 31 March 2010 at £168 million.</p>	<p>I will review the basis of the valuation and undertake audit procedures to confirm that they are reasonable.</p>

# 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.**

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

**16** Wherever possible, I complete some substantive testing earlier in the year before the financial statements are available for audit. I 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.

However, following discussions with officers, I do not plan to carry out any early testing in 2010/11. The capacity of officers preparing the Pension Fund financial statements is stretched and it has been agreed that additional audit procedures during the closedown period would not be helpful to them.

**17** 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.

- Pensions investments.

**18** 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 experts in the following areas.

- Management's expert: Valuation of freehold property portfolio - Colliers CRE.
- Audit Commission expert: Asset valuation of freehold property portfolio - Gerard Eve.

There is no requirement to rely on the work of other auditors for the audit opinion.



## Key milestones and deadlines

**The Pension Fund is required to prepare the financial statements by 30 June 2011. I am statutorily required to complete the audit and issue the opinion by 30 September 2011. As in previous years, I am planning to issue the opinion by 31 July 2011.**

**19** The key stages in producing and auditing the financial statements are in table 2.

**20** 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.

**21** 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**

<b>Activity</b>	<b>Date</b>
Control and early substantive testing	April 2011
Receipt of accounts	10 June 2011
Sending audit working papers to the auditor	13 June 2011
Start of detailed testing	13 June 2011
Progress meetings	Weekly
Present report to those charged with governance at the audit committee	30 June 2011
Issue opinion	By 31 July 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
Darren Wells District Auditor	<a href="mailto:d-wells@audit-commission.gov.uk">d-wells@audit-commission.gov.uk</a> 0844 798 6110	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive.
Elizabeth Olive Audit Manager	<a href="mailto:e-olive@audit-commission.gov.uk">e-olive@audit-commission.gov.uk</a> 0844 798 1377	Manages and coordinates the different elements of the audit work. Key point of contact for the Director of Finance.

## Independence and objectivity

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

**23** 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

**24** 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

**25** 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.

26 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

27 My team will discuss and agree reports with the right officers before issuing them to the Governance and Audit Committee and Superannuation Fund Panel.

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Table 4: **Planned outputs**

Planned output	Indicative date to Governance and Audit Committee
Opinion audit plan	16 March 2011
Annual governance report	30 June 2011 (interim) September 2011 (final - if required)
Auditor's report giving an opinion on the financial statements	July 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 the following.

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

### Assumptions

In setting the fee, I have assumed the following.

- 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 all 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; and
  - prompt responses to draft reports.
- 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 Governance and Audit Committee of Kent County Council. Issues will also be raised with members of the Superannuation Fund Panel. 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**

Council officers	Audit Commission staff	Timing	Purpose
Head of Financial Services	Audit Manager (AM) and Team Leader (TL)	March, June, September	General update plus: <ul style="list-style-type: none"> <li>■ March - opinion audit plan and fee letter; and</li> <li>■ June - accounts progress and annual governance report</li> </ul>
Treasury & Investments Manager	AM and TL	Quarterly	Update on audit issues.
Finance closedown meetings	KCC TL	Monthly from November to May	Progress against closedown plan.
Governance and Audit Committee	DA and AM, with TL as appropriate	16 March 2011 30 June 2011 14 September 2011 29 November 2011	Formal reporting of: <ul style="list-style-type: none"> <li>■ Audit Plan;</li> <li>■ Annual governance report; and</li> <li>■ other issues as appropriate.</li> </ul>
Superannuation Fund Committee	DA and AM, with TL as appropriate	4 March 2011 20 May 2011 1 July 2011 2 September 2011 18 November 2011	Formal reporting of: <ul style="list-style-type: none"> <li>■ Audit Plan;</li> <li>■ Annual governance report; and</li> <li>■ other issues as appropriate.</li> </ul>

## **Sustainability**

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



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