

Appendix 3

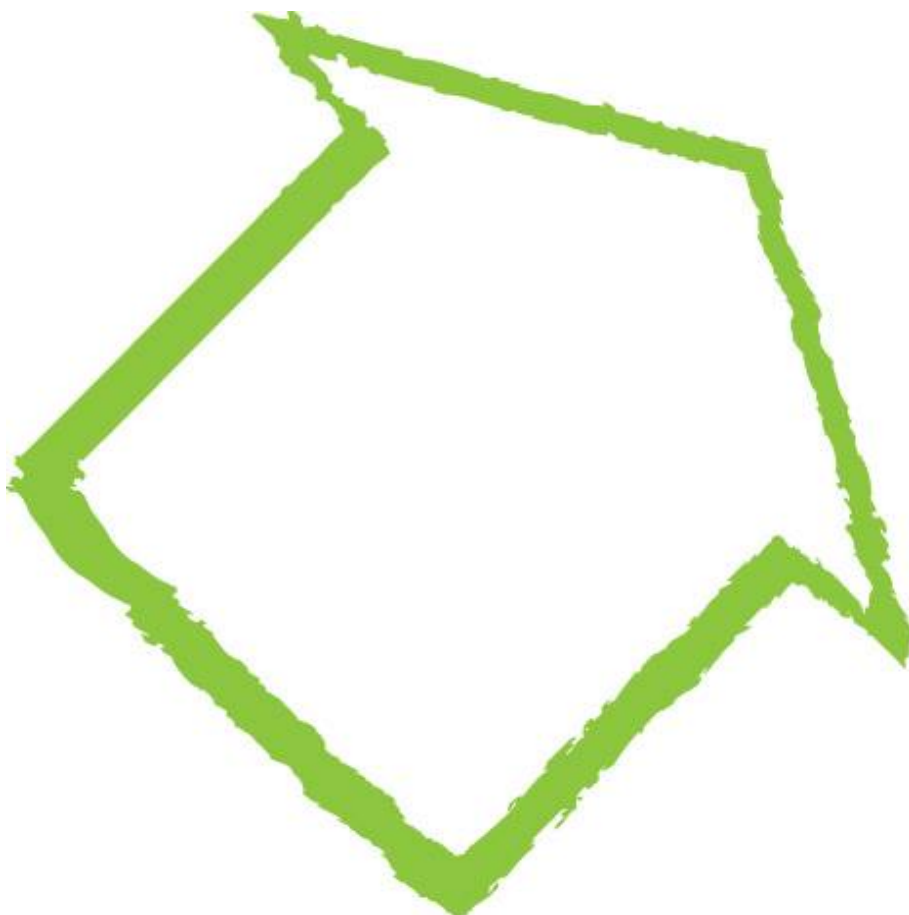
Pension Fund

Opinion Plan

London Borough of Lewisham Pension Fund

Audit 2009/2010

June 2010



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Status of our reports

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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Introduction

- 1 This plan sets out the audit work we propose to undertake in relation to the audit of financial statements 2009/10 for Lewisham Council's Pension Fund accounts. 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 and improvement priorities.
- 2 I will discuss any reports arising from the audit, with the Pension Investment Committee. However, as the pension fund accounts remain part of the financial statements of Lewisham Council as a whole, the Audit Committee will retain ultimate responsibility for receiving, considering and agreeing the audit plans, as well as receiving and considering any reports arising from the audit.
- 3 The audit planning process for 2009/10, 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

- 4 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.
- 5 The Statement summarises where the different responsibilities of auditors and of the audited body begin and end, and our audit work is undertaken in the context of these responsibilities.
- 6 We comply with the statutory requirements governing our audit work, in particular:
 - the Audit Commission Act 1998; and
 - the Code of Audit Practice.
- 7 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 of financial statements

- 8 The fee for the audit is £35,000, as discussed and agreed with the Executive Director of Resources.

In setting the fee, we have assumed that the general level of risk in relation to the audit of the pension fund accounts will not be significantly different from that identified when planning the 2008/09 audit.

- 9 If I need to make significant amendments to the risk assessment, I will be required to undertake additional work which is likely to result in an increased audit fee. Where this is the case, we will discuss this in the first instance with the Executive Director of Resources and then we 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.

Specific actions Lewisham Pension Fund could take to reduce its audit fees

- 11 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, we will work with staff to identify any specific actions that Lewisham Pension Fund could take and to provide ongoing audit support.

Auditor's report on the financial statements

- 12 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).
- 13 I am required to issue an audit report giving my opinion on whether the pension fund financial statements presents fairly the financial position of Lewisham Pension Fund as at 31 March 2010 and its income and expenditure for the year then ended.
- 14 I am also required to review the pension fund annual report, which is required to be produced under Regulation 34 of the Local Government Pension Scheme (Administration) Regulations 2008.

Identifying opinion audit risks

- 15 As part of our audit risk identification process we need to fully understand the audited body to identify any risk of material misstatement (whether due to fraud or error) in the financial statements. We do this by:
 - identifying the business risks facing Lewisham Pension Fund, including assessing your own risk management arrangements;
 - considering the financial performance of Lewisham 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 Lewisham Pension Fund information systems.

Identification of specific risks

- 16 We 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	Assertions	Audit response
<p>Unquoted Investments</p> <p>The valuation of unquoted investments is potentially a very complex area. There are risks around accurate valuation at year end.</p>	<p>Disclosure</p> <p>Valuation & allocation</p>	<p>We will review the processes for the valuation of investments and the accounting treatment and disclosure to determine if investments are recorded at appropriate valuations at the year end.</p>
<p>HarbourVest</p> <p>One of the Council's pension fund managers, HarbourVest, was unable to provide a SAS 70 report, an independent auditors' report on the fund manager's internal controls and procedures as far as they relate to client assets and cash.</p>	<p>Revenue account</p> <p>Occurrence</p> <p>Net assets statement</p> <p>Rights & Obligations</p> <p>Valuation & allocation</p>	<p>We will work with officers to ensure that appropriate documentation is available in respect of all fund managers in 2009/10.</p>
<p>Statement of Recommended Practice (SoRP)</p> <p>The Pension Fund accounts are required to be fully compliant with the SoRP.</p>	<p>Disclosure</p>	<p>We will discuss the SORP disclosure checklist with the Council to assist in preparation of the accounts.</p> <p>We will review compliance against the SORP, once the final accounts have been produced.</p>

Testing strategy

- 17 On the basis of risks identified above we 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.
- 18 Our testing can be carried out both before and after the draft financial statements have been produced (pre- and post-statement testing). However, the final levels of substantive testing can only be made once accounts have been presented for audit.
- 19 Wherever possible, we will complete some substantive testing earlier in the year before the financial statements are available for audit. We have identified the following areas where substantive testing could be carried out early:
 - Investigating the possibility of adopting a controls-based approach in respect of contributions received, benefits paid and/or transfers in and out to reduce the extent of substantive testing at the final accounts stage of the audit. If this approach is not feasible, we will perform some early substantive testing of transfers in and out; and
 - Request direct confirmation of investments and investment audit reports (AAF/001s and/or SAS70s) from fund managers and the custodian.

Where other early testing is identified as being possible this will be discussed with officers.

- 20 Wherever possible we seek to rely on the work of Internal Audit to help meet our responsibilities. For 2010/11, we will discuss with Internal Audit their audit plan to enable the identification of areas of work on which we may place reliance in the future.

Key milestones and deadlines

- 21 Lewisham Pension Fund is required to prepare the financial statements by 30 June 2010. We are required to complete our audit and issue our opinion by 30 September 2010. The key stages in the process of producing and auditing the financial statements are shown in Table 2. We have provided indicative dates, and will agree these with the Executive Director of Resources before the commencement of the interim audit.
- 22 We will agree with you a schedule of working papers required to support the entries in the financial statements.
- 23 We will meet with the key contact and review the status of all queries while on site. If appropriate, we will meet at a different frequency depending upon the need and the number of issues arising.

Table 2 **Proposed timetable**

Task	Deadline
Control and early substantive testing	June 2010
Receipt of accounts	June 2010
Forwarding audit working papers to the auditor	June 2010
Start of detailed testing	July 2010
Progress meetings	Weekly during on site fieldwork
Present report to those charged with governance at the Audit committee	21 September 2010
Issue opinion	By 30 September 2010

The audit team

24 The key members of the audit team for the 2009/10 audit are shown in the table below.

Table 3 **Audit team**

Name	Contact details	Responsibilities
Sue Exton District Auditor	s-exton@audit-commission.gov.uk 0844 798 2307	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive.
Geoffrey Banister Audit Manager	g-banister@audit-commission.gov.uk 0844 798 2434	Manages and coordinates the different elements of the audit work. Key point of contact for the Executive Director of Resources and the Head of Pensions.
Jayne Rhodes Support Audit Manager	j-rhodes@audit-commission.gov.uk 0844 798 2673	Reports to the Audit Manager and controls the day-to-day audit.
Alexandrina Lazar Principal Auditor	a-lazar@audit-commission.gov.uk 0844 798 2011	Responsible for managing the on site audit work on a daily basis. Key point of contact for the Finance Manager.

Independence and objectivity

- 25 I am not aware of any relationships that may affect the independence and objectivity of the District Auditor and the audit staff, which we are required by auditing and ethical standards to communicate to you.
- 26 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

- 27 The audit team will maintain knowledge of your issues to inform our risk-based audit through regular liaison with key officers. Our proposals are set out in Appendix 3.

The audit team

Quality of service

- 28 We are committed to providing you with a high quality service. If you are in any way dissatisfied, or would like to discuss how we can improve our service, please contact me in the first instance. Alternatively you may wish to contact the London Head of Operations, Les Kidner (l-kidner@audit-commission.gov.uk).
- 29 If we are unable to satisfy your concerns, you have the right to make a formal complaint to the Audit Commission. The complaints procedure is set out in the leaflet 'Something to Complain About' which is available from the Commission's website or on request.
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Planned outputs

- 30 Reports will be discussed and agreed with the appropriate officers before being issued to the Pensions Committee.
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Table 4 **Planned outputs**

Planned output	Indicative date
Opinion audit plan	June 2010
Annual governance report	September 2010
Auditor's report giving an opinion on the financial statements	September 2010
Annual Audit Letter	November 2010

Appendix 1 – Basis for fee

- 1 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.
- 2 The risk assessment process starts with the identification of the significant financial and operational risks applying to the Pension Fund with reference to:
 - our cumulative knowledge of Lewisham Pension Fund;
 - planning guidance issued by the Audit Commission;
 - the specific results of previous and ongoing audit work;
 - interviews with Lewisham Pension Fund officers; and
 - liaison with Internal Audit.

Assumptions

- 3 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 2008/09;
 - you will inform us of significant developments impacting on the audit;
 - Internal Audit meets the appropriate professional standards;
 - Internal Audit have assessed the appropriateness of management response to external audit recommendations in relation to the 2008/09 financial statements audit;
 - good quality working papers and records will be provided to support the financial statements together with delivery of draft financial statements;
 - requested information will be provided within an agreed protocol and timescale framework;
 - prompt responses will be provided to draft reports; and
 - additional work will not be required to address questions or objections raised by local government electors.
- 4 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

- 1 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).
- 2 The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.
- 3 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.
- 4 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.
- 5 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.

- 6 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 five 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; and
 - 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

- 1 The audit team will maintain knowledge of your issues to inform our risk-based audit through regular liaison with key officers.
- 2 Our proposal for the meetings is as follows.

Table 5 Proposed meetings with officers

Council officers	Audit Commission staff	Timing	Purpose
Executive Director of Resources	District Auditor and Audit Manager	Quarterly	General update plus: April - audit fee letter January - Annual Audit Letter
Head of Pensions	AM and TL	Quarterly	Update on audit issues
Audit Panel	District Auditor and Audit Manager	As determined by the Audit Panel	Formal reporting of: Audit fee letter Annual Governance Report Annual Audit Letter Other issues as appropriate

Sustainability

- 3 The Audit Commission is committed to promoting sustainability in our working practices and we 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.

The Audit Commission

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.

Copies of this report

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