

## 2021 Audit Plan – Powys County Council Pension Fund

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# 2021 Audit Plan

## Summary

- 1 This document sets out the work I plan to undertake during 2021 to discharge my statutory responsibilities as your external auditor and to fulfil my obligations under the Code of Audit Practice to examine and certify whether Powys Pension Fund's (the Pension Fund) accounting statements are 'true and fair'.
- 2 The purpose of this plan is to set out my proposed work, when it will be undertaken, how much it will cost and who will undertake it.

## Impact of COVID-19

- 3 The COVID-19 pandemic continues to have a significant impact across the United Kingdom and on the work of public sector organisations. As in 2020, it is likely to significantly impact on the preparation of the 2020-21 accounts and my financial audit and performance audit work.
- 4 Recent developments in relation to a vaccine programme indicate that the Welsh Government's restrictions on movement and anticipated sickness absence levels are expected to ease through 2021. However, I recognise that there remains significant uncertainty and I understand that many local authorities may not be able to prepare accounts in line with the timetable set out in the Accounts and Audit (Wales) Regulations 2014. As well as the delivery of my statutory responsibilities as the Auditor General, my priority is to ensure the health, safety and wellbeing of Audit Wales staff, their families and those of our partners elsewhere in the public service at this incredibly challenging time.
- 5 Audit Wales staff will continue to work pragmatically to deliver the audit work set out in this plan. In response to the government advice and subsequent restrictions, we will continue to work remotely, building on the arrangements made in 2020, until such time that it is safe to resume on-site activities. I remain committed to ensuring that the work of Audit Wales staff will not impede the vital activities that public bodies need to do to respond to ongoing challenges presented by the COVID-19 pandemic.
- 6 Consequently, while this audit plan sets out an initial timetable for the completion of my audit work, the ongoing uncertainties around the impact of COVID-19 on the sector mean that some timings may need to be revisited. My audit team will discuss any amendments required to the proposed timetable with you as the 2021 position becomes clearer.

## Audit of pension fund accounts

- 7 The audit work I undertake to fulfil my responsibilities responds to my assessment of risks. This understanding allows us to develop an audit approach which focuses on addressing specific risks whilst providing assurance for the Pension Fund accounts as a whole.
- 8 I do not seek to obtain absolute assurance on the truth and fairness of the financial statements and related notes but adopt a concept of materiality. My aim is to identify material misstatements, that is, those that might result in a reader of the accounts being misled. The levels at which I judge such misstatements to be material will be reported to the Governance and Audit Committee prior to completion of the audit.
- 9 Any misstatements below a trivial level (set at 5% of materiality I judge as not requiring consideration by those charged with governance and therefore will not report them.
- 10 I will also report by exception on a number of matters which are set out in more detail in our [Statement of Responsibilities](#), along with further information about my work.

## Financial audit risks

- 11 The following table sets out the significant risks I have identified for the audit of the Pension Fund accounts.

### Exhibit 1: financial audit risks

This table summarises the key financial audit risks identified at the planning stage of the audit.

Audit risk	Proposed audit response
<b>Significant risks</b>	
<p><b>Management Override</b></p> <p>The risk of management override of controls is present in all entities. Due to the unpredictable way in which such override could occur, it is viewed as a significant risk [ISA 240.31-33].</p>	<p>My audit team will:</p> <ul style="list-style-type: none"> <li>• test the appropriateness of journal entries and other adjustments made in preparing the financial statements;</li> <li>• review accounting estimates for biases; and</li> </ul>

Audit risk	Proposed audit response
	<ul style="list-style-type: none"> <li>• evaluate the rationale for any significant transactions outside the normal course of business.</li> </ul>
<p><b>Impact of COVID-19</b></p> <p>The COVID-19 national emergency continues and the pressures on staff resource and of remote working may impact on the preparation, audit and publication of accounts. There is a risk that the quality of the accounts and supporting working papers, eg around estimates and valuations, may be compromised leading to an increased incidence of errors. Quality monitoring arrangements may be compromised due to timing issues and/or resource availability.</p>	<p>We will discuss your closedown process and quality monitoring arrangements with the accounts preparation team, and make arrangements to monitor the accounts preparation process. We will help to identify areas where there may be gaps in arrangements.</p>
<p><b>Other areas of audit attention</b></p>	
<p><b>Wales Pension Partnership</b></p> <p>The eight Pension Funds in Wales have created an ‘all-Wales’ pooled investment vehicle which will be overseen and reported on by a joint governance committee the ‘Wales Pension Partnership’.</p> <p>Powys Pension Fund has transferred funds into several new arrangements over the last three financial years.</p> <p>There is a risk that these investment fund balances will not be adequately disclosed in the 2020-21 financial statements.</p>	<p>My team will work with the auditors of the joint governance committee to obtain the assurances needed on the valuation of the funds transferred into the Wales Pension Partnership arrangements.</p>
<p><b>Private Equity Investments</b></p> <p>Year-end valuations of private equity investments are provided by investment managers which are based upon forward-looking estimates and</p>	<p>My audit team will:</p> <ul style="list-style-type: none"> <li>• confirm the investment valuation to audited financial statements; and;</li> </ul>

Audit risk	Proposed audit response
<p>judgements and industry guidelines. As there is no quoted market process, there is a greater risk for the reasonableness of valuation bases of these investments.</p>	<ul style="list-style-type: none"> <li>• seek additional assurance over the valuation basis from control assurance reports.</li> </ul>
<p><b>Pooled Property Unit Trust Investments</b></p> <p>The Pension Fund held pooled property unit trust investments totalling £61 million as at 31 March 2020.</p> <p>Fund valuers included reference to ‘Material Estimation Uncertainty’, as a result of the pandemic, in respect of these investments at 31 March 2020. As the investments comprise assorted property holdings, the disclaimer covered risks of the valuations being inaccurate to an unknown degree owing to the uncertain state of the global property markets. Due to the ongoing nature of the pandemic, these assets could again be the subject of material estimation uncertainty.</p>	<p>My audit team will:</p> <ul style="list-style-type: none"> <li>• confirm the investment valuations to fund manager reports and establish whether any of the pooled property unit trust investments remain subject to any disclaimers placed against the year-end valuations;</li> <li>• seek additional assurance over the valuation basis from control assurance reports; and</li> <li>• confirm that any material estimation uncertainties have been appropriately disclosed in the accounts.</li> </ul>
<p><b>McCloud judgement</b></p> <p>In 2015 the Government introduced reforms to public sector pensions, meaning most public sector workers were moved into new pension schemes in 2015.</p> <p>In December 2018, the Court of Appeal ruled that the ‘transitional protection’ arrangements amounted to unlawful discrimination.</p> <p>Consultations on proposed remedies for the Local Government, Police and Fire pensions schemes closed in October 2020. The Government recently announced its proposed remedy for this judgement and final details are expected to be published during 2021.</p>	<p>My audit team will:</p> <ul style="list-style-type: none"> <li>• review how the Pension Fund has assessed the impact of the McCloud judgement on the financial statements; and</li> <li>• ensure that where appropriate, this is adequately disclosed in the financial statements.</li> </ul>

Audit risk	Proposed audit response
The impact of the judgement is likely to have a significant impact on the disclosed liabilities for the Pension Fund.	

## Statutory audit functions

- 12 In addition to the audit of the accounts, I have statutory responsibilities to receive questions and objections to the accounts from local electors. These responsibilities are set out in the Public Audit (Wales) Act 2004:
- Section 30 Inspection of documents and questions at audit; and
  - Section 31 Right to make objections at audit.
- 13 As this work is reactive, I have not included an estimated fee in **Exhibit 2** below. If I do receive questions or objections, I will discuss potential audit fees at the time.

## Fee, audit team and timetable

- 14 My fees and planned timescales for completion of the audit are based on the following assumptions:
- the financial statements are provided in accordance with a timescale to be agreed, taking into account the impact of COVID-19, to the quality expected and have been subject to a robust quality assurance review;
  - information provided to support the financial statements is in accordance with the agreed audit deliverables document;
  - appropriate accommodation and facilities are provided to enable my audit team to deliver the audit in an efficient manner;
  - all appropriate officials will be available during the audit;
  - you have all the necessary controls and checks in place to enable the Responsible Financial Officer to provide all the assurances that I require in the Letter of Representation addressed to me;
  - Internal Audit's planned programme of work is complete and management has responded to issues that may have affected the financial statements; and
  - Controls assurance reports are received from fund managers in accordance with agreed timescales and action has been taken to address any control weaknesses.

## Fee

- 15 Your estimated fee for 2021 is set out in **Exhibit 2**. This fee is at the same level as your actual 2020 fee.

### Exhibit 2: audit fee

This table sets out the proposed audit fee for 2021, by area of audit work, alongside the actual audit fee for last year.

Audit area	Proposed fee (£) <sup>1</sup>	Actual fee last year (£)
Audit of pension fund accounts <sup>2</sup>	34,599	34,599

- 16 Planning will be ongoing, and changes to my programme of audit work, and therefore my fee, may be required if any key new risks emerge. I shall make no changes without first discussing them with the Head of Finance.
- 17 Further information on my [fee scales and fee setting](#) can be found on our website.

## Audit team

- 18 The main members of my team, together with their contact details, are summarised in **Exhibit 3**.

### Exhibit 3: my audit team

This table lists the members of the local audit team and their contact details.

Name	Role	Contact number	E-mail address
Anthony Veale	Engagement Lead	02920 320585	<a href="mailto:anthony.veale@audit.wales">anthony.veale@audit.wales</a>
Phil Pugh	Audit Manager (Financial Audit)	07964 118615	<a href="mailto:phil.pugh@audit.wales">phil.pugh@audit.wales</a>

<sup>1</sup> Notes: The fees shown in this document are exclusive of VAT, which is not charged to you.

<sup>2</sup> Payable November 2020 to October 2021.

Name	Role	Contact number	E-mail address
Gareth Rees	Audit Lead (Financial Audit)	02920 829304	<a href="mailto:gareth.rees@audit.wales">gareth.rees@audit.wales</a>

## Timetable

- 19 The key milestones for the work set out in this plan are shown in **Exhibit 4**. As highlighted earlier, there may be a need to revise the timetable in light of developments with COVID-19.

### Exhibit 4: Audit timetable

Planned output	Work undertaken	Report finalised
2021 Audit Plan	January to March 2021	May 2021
<b>Audit of pension fund accounts:</b> <ul style="list-style-type: none"> <li>• Audit of Financial Statements Report</li> <li>• Opinion on Financial Statements</li> </ul>	March to September 2021 October 2021	October 2021  October 2021
2022 Audit Plan	January to March 2022	March 2022

- 20 I can confirm that my team members are all independent of the Pension Fund and your officers. In addition, I am not aware of any potential conflicts of interest that I need to bring to your attention.





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We welcome correspondence and telephone calls in Welsh and English.  
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