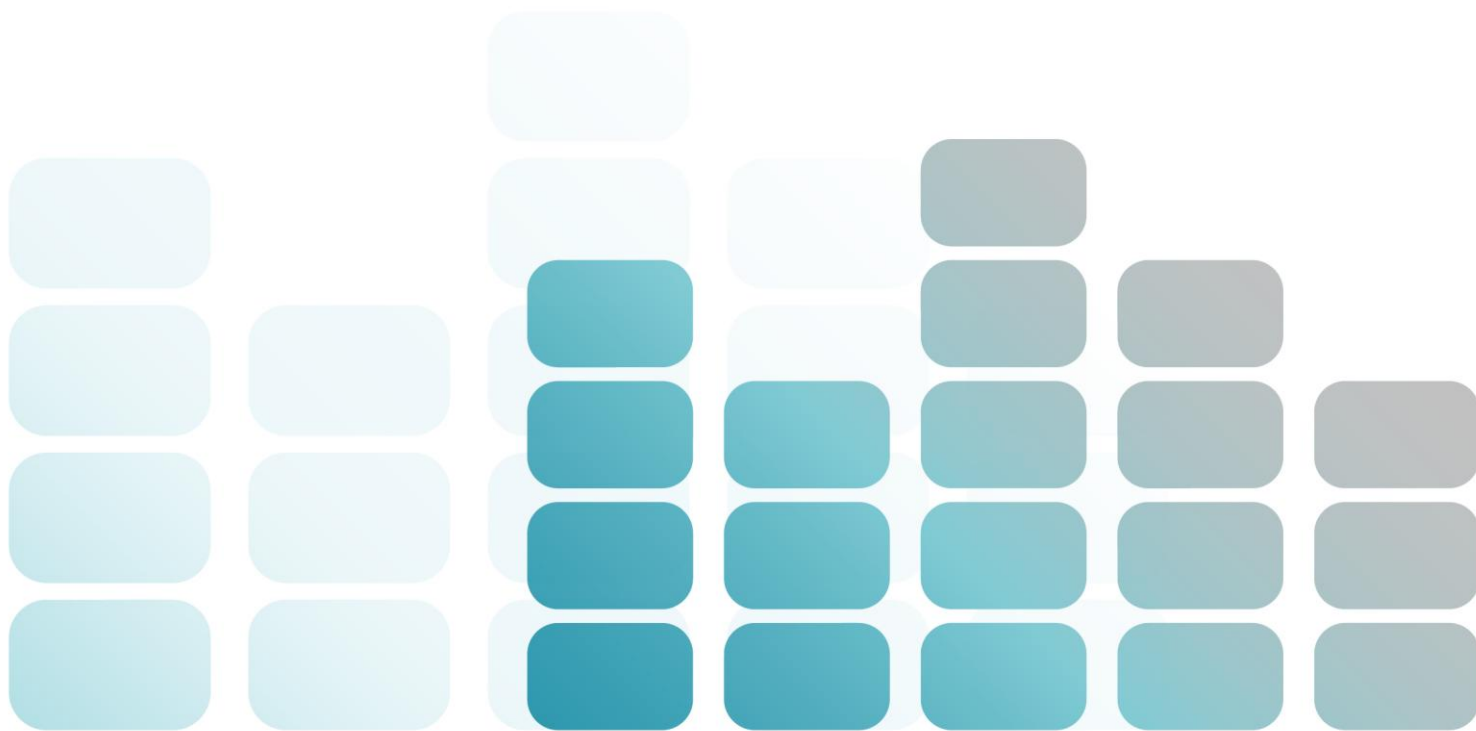


Scottish Borders Council Pension Fund

Annual Audit Plan 2025/26



Prepared for Scottish Borders Council Pension Fund
March 2026

Contents

Introduction	3
Audit scope and responsibilities	4
Audit of the annual accounts	6
Wider scope and Best Value	10
Reporting arrangements, timetable and audit fee	12
Other matters	15

Accessibility

You can find out more and read this report using assistive technology on our website www.audit.scot/accessibility.

Introduction

Purpose of the Annual Audit Plan

1. The purpose of this Annual Audit Plan is to provide an overview of the planned scope and timing of the 2025/26 audit of Scottish Borders Council Pension Fund annual accounts. It outlines the audit work planned to meet the audit requirements set out in [auditing standards](#) and the [Code of Audit Practice](#), including supplementary guidance.

Appointed auditor and independence

2. John Boyd, of Audit Scotland, has been appointed by the Accounts Commission as external auditor of Scottish Borders Council Pension Fund hereafter referred to as 'the Pension Fund', for the period from 2022/23 until 2026/27. The 2025/26 financial year is therefore the fourth of the five-year audit appointment.

3. John Boyd and the audit team are independent of the Pension Fund in accordance with relevant ethical requirements, including the Financial Reporting Council's Ethical Standard. This standard imposes stringent rules to ensure the independence and objectivity of auditors. Audit Scotland has robust arrangements in place to ensure compliance with ethical standards. The arrangements are overseen by the Executive Director of Innovation and Quality, who serves as Audit Scotland's Ethics Partner.

4. The Ethical Standard requires auditors to communicate any relationships that may affect the independence and objectivity of the audit team. There are no such relationships pertaining to the audit of the Pension Fund to communicate.

Audit scope and responsibilities

Scope of the audit

5. The audit is performed in accordance with the Code of Audit Practice, including supplementary guidance, International Standards on Auditing (UK), and relevant legislation. These set out the requirements for the scope of the audit which includes:

- An audit of the financial statements and an opinion on whether they give a true and fair view and are free from material misstatement.
- An opinion on statutory other information published with the financial statements in the annual accounts, the Performance Report, the Annual Governance Statement, and the Governance Compliance Statement.
- Conclusions on the Pension Fund's arrangements in relation to the wider scope areas: Financial Management, Financial Sustainability, Vision, Leadership, and Governance, and Use of Resources to Improve Outcomes.
- Provision of an Annual Audit Report setting out significant matters identified from the audit of the annual accounts and the wider scope areas specified in the Code of Audit Practice.

Responsibilities

6. The Code of Audit Practice sets out the respective responsibilities of the Pension Fund and the auditor. A summary of the key responsibilities is outlined below.

Auditor's responsibilities

7. The responsibilities of auditors in the public sector are established in the Local Government (Scotland) Act 1973. These include providing an independent opinion on the financial statements and other information reported within the annual accounts, and concluding on the Pension Fund's arrangements in place for the wider scope areas.

The Pension Fund's responsibilities

8. The Pension Fund has primary responsibility for ensuring proper financial stewardship of public funds, compliance with relevant legislation and establishing effective arrangements for governance, propriety and regularity that enables it to successfully deliver its objectives. The features of proper financial stewardship include:

- Establishing arrangements to ensure the proper conduct of its affairs.
- Preparation of annual accounts, comprising financial statements that give a true and fair view and other information.
- Establishing arrangements for the prevention and detection of fraud, error and irregularities, and bribery and corruption.
- Implementing arrangements to ensure its financial position is soundly based.
- Establishing an internal audit function.

Audit of the annual accounts

Introduction

9. The audit of the annual accounts is driven by materiality and the risks of material misstatement in the financial statements, with greater attention being given to the significant risks of material misstatement. This chapter outlines materiality, the significant risks of material misstatement that have been identified, and the impact these have on the planned audit procedures.

Materiality

10. The concept of materiality is applied by auditors in planning and performing an audit, and in evaluating the effect of any uncorrected misstatements on the financial statements or other information reported in the annual accounts.

11. Broadly, the concept of materiality is to determine whether matters identified during the audit could reasonably be expected to influence the decisions of users of the financial statements. Auditors set a monetary threshold when determining materiality, although some issues may be considered material by their nature. Therefore, materiality is ultimately a matter of the auditor's professional judgement.

12. The materiality levels determined for the audit of the Pension Fund are outlined in [Exhibit 1](#).

Exhibit 1

2025/26 Materiality levels for the Pension Fund

Materiality	Pension Fund
Materiality – based on an assessment of the needs of users of the financial statements and the nature of the Pension Fund operations. The benchmark used to determine materiality is net investment assets based on the audited 2024/25 financial statements. Materiality has been set at 2% of the benchmark.	£19.1 million

Materiality	Pension Fund
Performance materiality – this acts as a trigger point. If the aggregate of misstatements identified during the audit exceeds performance materiality, this could indicate that further audit procedures are required. Using professional judgement, performance materiality has been set at 75% of planning materiality.	£14.3 million
Reporting threshold – all misstatements greater than the reporting threshold will be reported. Using professional judgement, reporting threshold has been set at 5% of planning materiality.	£0.95 million

Source: Audit Scotland

Significant risks of material misstatement to the financial statements

13. The risk assessment process draws on the audit team’s cumulative knowledge of the Pension Fund, including the nature of its operations and its significant transaction streams, the system of internal control, governance arrangements and processes, and developments that could impact on its financial reporting.

14. Based on the risk assessment process, significant risks of material misstatement to the financial statements have been identified and these are summarised in [Exhibit 2](#). These are the risks which have the greatest impact on the planned audit approach, and the planned audit procedures in response to the risks are outlined in Exhibit 2.

15. The risk assessment process is an iterative and dynamic process. The assessment of risks set out in this Annual Audit Plan and Exhibit 2 may change as more information and evidence is obtained over the course of the audit. Where such changes occur, these will be reported to the Pension Fund and those charged with governance, where relevant.

Exhibit 2

Significant risks of material misstatement to the financial statements

Significant risks of material misstatement	Planned audit response
Fraud caused by management override of controls Management is in a unique position to perpetrate fraud	The audit team will: <ul style="list-style-type: none"> Evaluate the design of controls over journal entry processing.

Significant risks of material misstatement	Planned audit response
<p>because of management's ability to override controls that otherwise appear to be operating effectively.</p>	<ul style="list-style-type: none"> • Make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries. • Test journals entries, focusing on those that are assessed as higher risk of material misstatement through fraud. • Evaluate significant transactions outside the normal course of business. • Assess the adequacy of controls in place for identifying and disclosing related party relationships and transactions in the financial statements. • Assess changes to the methods and underlying assumptions used to prepare accounting estimates and assess these for evidence of management bias.
<p>Estimation applied to level 3 investments</p> <p>The Pension Fund has a significant portfolio of level 3 investments (£338.5 million as at 31 March 2025) where valuations involve the application of a variety of estimates in determining appropriate valuations. This subjectivity gives rise to a significant risk of material misstatement in the financial statements.</p>	<p>The audit team will:</p> <ul style="list-style-type: none"> • Critically assess the Pension Fund's arrangements for arriving at the valuation of level 3 investments, including reviewing the use of experts in undertaking the valuation. This includes assessing the adequacy of the design of controls over level 3 investments valuations. • Agree level 3 investment balances at the year end to the year-end valuations to independently sourced fund manager valuation reports and custodian reports. • Review the relevant investment managers' controls assurance reports for qualifications or exceptions that may affect the audit. • Review the relevant investment managers' controls assurance reports to consider the key controls over investment managers' valuation arrangements. • Review the disclosures included in the accounts to ensure these are adequate in directing the user of the accounts to areas with significant judgement and estimation uncertainty. • Undertake substantive testing procedures over level investments to gain sufficient assurance of valuation as at 31 March 2026.

Source: Audit Scotland

16. As part of our assessment of audit risks, we have identified other areas where we consider there are also risks of material misstatement to the financial statements. Based on our assessment of the likelihood and

magnitude of the risks, we do not consider these to represent significant risks. We will keep these areas under review as our audit progresses.

17. The disclosure of the actuarial valuation of the Pension Fund's liabilities involves a complex actuarial estimate. The Pension Fund engages an independent actuary to support the estimation. The valuation is based on a range of financial and demographic estimations about the future, based on a well-established methodology. The subjectivity around these estimates gives rise to a presentational risk of material misstatement.

18. Within the 2024/25 financial statements, £333.7 million of investments were categorised as Level 2 investments. There are no publicly quoted prices available for this type of investments in an active market, but the pricing of investments uses inputs that are based significantly on observable market data. The estimation gives rise to a risk of material misstatement (accuracy, valuation and allocation). The audit team will assess the adequacy of the design of controls over level 2 investments, agree level 2 investment balances as at 31 March 2026 to the year-end valuations in independently sourced fund manager valuation reports and custodian reports, and perform audit procedures, including sample testing of level 2 investments. A review of controls assurance reports will also be completed.

Key audit matters

19. The Code of Audit Practice requires public sector auditors to communicate key audit matters. Key audit matters are those matters, that in the auditor's professional judgement, are of most significance to the audit of the financial statements and require most attention when performing the audit.

20. In determining key audit matters, auditors consider:

- Areas of higher or significant risk of material misstatement.
- Areas where significant judgement is required, including accounting estimates that are subject to a high degree of estimation uncertainty.
- Significant events or transactions that occurred during the year.

21. The matters determined to be key audit matters will be communicated in the Annual Audit Report. Exhibit 2 outlines the significant risks of material misstatement to the financial statements that have been identified, including those that have greatest impact on the planned audit procedures and require most attention when performing the audit.

Wider scope and Best Value

Introduction

22. Reflecting the fact that public money is involved, the Code of Audit Practice requires that public audit is planned and undertaken from a wider perspective than in the private sector. The wider scope audit set out by the Code of Audit Practice broadens the audit of the annual accounts to include consideration of additional aspects or risks in four wider scope areas, which are summarised below:

- **Financial Management** – this means having sound budgetary processes. Factors that can impact on the Pension Fund being able to secure sound financial management include the strength of the financial management culture, accountability, and arrangements to prevent and detect fraud, error and other irregularities, bribery and corruption.
- **Financial Sustainability** – this means looking forward over the medium and longer term in planning the services to be delivered and how they will be delivered effectively. This is assessed by considering the Pension Fund’s medium to longer-term planning for service delivery.
- **Vision, Leadership and Governance** – this means having a clear vision and strategy, with set priorities within the vision and strategy. This is assessed by considering the clarity of plans in place to deliver the vision and strategy and the effectiveness of the governance arrangements to support delivery.
- **Use of Resources to Improve Outcomes** – this means using resources to meet stated outcomes and improvement objectives through effective planning and working with partners and communities. This is assessed by considering the Pension Fund’s arrangements for ensuring resources are deployed to improve strategic outcomes, meet the needs of service users, and deliver continuous improvement.

23. A conclusion on the effectiveness and appropriateness of arrangements the Pension Fund has in place for each of the wider scope areas will be reported in the Annual Audit Report.

Best Value

24. The Scottish Borders Council Pension Fund is administered by Scottish Borders Council. As pension funds are not local authorities or

separate bodies that fall within section 106 of the Local Government (Scotland) Act 1973, the statutory responsibility for securing Best Value for pension funds lies with the administering local authority, Scottish Borders Council.

25. Therefore, consideration of the arrangements the Pension Fund has put in place to secure Best Value will be carried out as part of the Scottish Borders Council audit. A conclusion on the arrangements and any matters relating to the Pension Fund (identified in the work on the administering authority) will be reported in the Annual Audit Report.

Wider scope and Best Value risks

26. No risks in the wider scope areas or Best Value were identified from the risk assessment process for the Pension Fund.

Reporting arrangements, timetable and audit fee

Audit outputs

27. The outputs from the 2025/26 audit include:

- This Annual Audit Plan.
- An Independent Auditor's Report to the Pension Fund Committee and the Accounts Commission setting out opinions on the annual accounts.
- An Annual Audit Report to the Pension Fund Committee and the Accounts Commission setting out significant matters identified from the audit of the annual accounts, conclusions from the wider scope and Best Value audit, recommendations, where required, and any good practice identified.

28. The matters to be reported in the outputs will be discussed with the Pension Fund for factual accuracy before they are issued. All outputs from the audit will be published on [Audit Scotland's website](#), apart from the Independent Auditor's Report, which is included in the audited annual accounts.

29. Target dates for the audit outputs are set by the Accounts Commission. In setting the target dates for the audit outputs, consideration is given to the target date for approving the annual accounts, which is 30 September 2026.

30. The Independent Auditor's Report and Annual Audit Report are planned to be issued by the target date of 30 September 2026.

Audit timetable

31. Achieving the timetable for production of the annual accounts, supported by complete and accurate working papers, is critical to delivery of the audit to agreed target dates. [Exhibit 3](#) includes a timetable for the audit, which has been agreed with management. Agreed target dates will be kept under review as the audit progresses, and any changes required, and their potential impact, will be discussed with the Pension Fund and reported to those charged with governance, where required.

Exhibit 3

2025/26 audit timetable

Audit activity	Pension Fund target date	Audit team target date	Relevant committee date
Issue of Annual Audit Plan		23 February 2026	5 March 2026
Annual accounts:			
• Consideration of unaudited annual accounts by those charged with governance	18 June 2026		18 June 2026
• Submission of unaudited annual accounts and all working papers to audit team	30 June 2026		
• Latest date for audit clearance meeting	5 September 2026	5 September 2026	
• Issue of draft Letter of Representation, proposed Independent Auditor's Report, and proposed Annual Audit Report		12 September 2026	
• Agreement of audited and unsigned annual accounts	11 September 2026	11 September 2026	
• Approval of audited annual accounts by those charged with governance	17 September 2026		17 September 2026
• Signing audited annual accounts by those charged with governance	24 September 2026		24 September 2026
• Signing of Independent Auditor's Report and issue of Annual Audit Report		By 30 September 2026	

Source: Audit Scotland

Audit fee

32. The Pension Fund's audit fee is determined in line with Audit Scotland's fee setting arrangements. The agreed audit fee for the 2025/26 audit is set out in [Exhibit 4](#).

33. In setting the audit fee, it is assumed that the Pension Fund has effective governance arrangements in place and the complete annual accounts will be provided for audit in line with the agreed timetable. The audit fee assumes there will be no significant changes to the planned scope of the audit. Where the audit cannot proceed as planned, for example, due to incomplete or inadequate working papers, the audit fee may need to be increased.

Exhibit 4

Audit fee

Fee component¹	Fee (£)
External auditor remuneration	49,360
Pooled costs, such as travel and subsistence costs	1,700
Adjustment for average audit price increase	-23,020
Total 2025/26 fee	28,040

Source: Audit Scotland

¹ Information on the components that make up the total fee can be found in Audit Scotland's [Audit management and quality guidance](#).

Other matters

Internal audit

34. The Pension Fund is responsible for establishing an internal audit function as part of an effective system of internal control. As part of the audit, the audit team will obtain an understanding of internal audit, including its nature, responsibilities, and activities.

35. While internal audit and external audit have differing roles and responsibilities, external auditors may seek to rely on the work of internal audit where it is considered appropriate. A review of internal audit's 2025/26 audit plan was carried out to identify if there were any areas where the audit team could rely on its work. The audit team concluded it will not rely on internal audit's work. However, the audit team will review internal audit's reports and assess if there is any impact on the audit.

Audit quality

36. Audit Scotland is committed to the consistent delivery of high-quality audit. Audit quality requires ongoing attention and improvement to keep pace with external and internal changes. Details of the arrangements in place for the delivery of high-quality audits is available from the [Audit Scotland website](#).

37. The International Standards on Quality Management (ISQM) applicable to Audit Scotland for 2025/26 audits are:

- ISQM (UK) 1, which deals with an audit organisation's responsibilities to design, implement, and operate a system of quality management (SoQM) for audits. Audit Scotland's SoQM consists of a variety of components, such as governance arrangements and culture to support audit quality, compliance with ethical requirements, ensuring Audit Scotland is dedicated to high-quality audit through engagement performance and resourcing arrangements, and ensuring there are robust quality monitoring arrangements in place. Audit Scotland carries out an annual evaluation of its SoQM and has concluded it complies with this standard.
- ISQM (UK) 2, which sets out arrangements for conducting engagement quality reviews, which are performed by senior management not involved in an audit, to review significant judgements and conclusions reached by the audit team, and the appropriateness of proposed audit opinions on high-risk audits.

38. To monitor quality at an individual audit level, Audit Scotland carries out internal quality reviews on a sample of audits. Additionally, the Institute of Chartered Accountants of England and Wales (ICAEW) carries out independent quality reviews on a sample of audits.

39. Actions to address deficiencies identified by internal and external quality reviews are included in a rolling Quality Improvement Action Plan, which is used to support continuous improvement. Progress with implementing planned actions is monitored on a regular basis by Audit Scotland's Quality and Ethics Committee.

40. Audit Scotland may periodically seek the views of the Pension Fund on the quality of audit services provided. The audit team would also welcome feedback at any time.

Scottish Borders Council Pension Fund

Annual Audit Plan 2025/26



Audit Scotland, 4th Floor, 102 West Port, Edinburgh EH3 9DN

Phone: 0131 625 1500

www.audit.scot