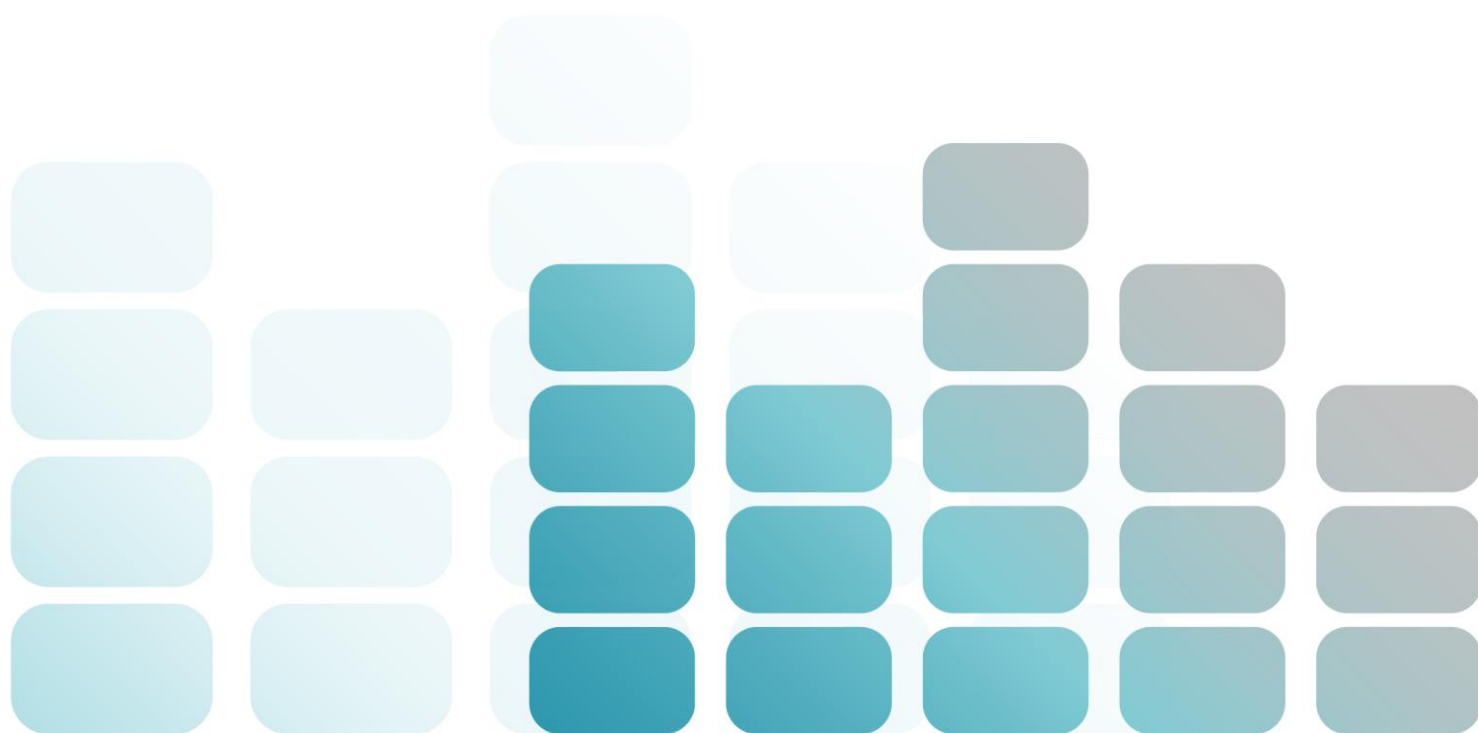


Scottish Public Pensions Agency NHS Pension Scheme (Scotland) Scottish Teachers Pension Scheme Annual Audit Plan 2025/26



Prepared for Scottish Public Pensions Agency
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Introduction

Purpose of the Annual Audit Plan

1. The Scottish Public Pensions Agency (the agency) is an executive agency of the Scottish Government. It is responsible for administering and presenting accounts for the NHS Pension Scheme (Scotland) (NHSPSS) and Scottish Teachers' Pension Scheme (STPS). The agency is also required to prepare accounts for its own finances, referred to here as SPPA.
2. The purpose of this Annual Audit Plan is to provide an overview of the planned scope and timing of the 2025/26 audit of SPPA, NHSPSS and STPS annual report and 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

3. Pauline Gillen, of Audit Scotland, has been appointed by the Auditor General for Scotland as the external auditor of SPPA, NHSPSS and STPS for the period from 2025/26 until 2026/27.
4. Pauline Gillen and the audit team are independent of the agency 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.
5. 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 SPPA, NHSPSS and STPS to communicate.

Audit scope and responsibilities

Scope of the audit

6. 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 report and accounts, namely the Performance Report, the Governance Statement and the audited part of the Remuneration and Staff Report for SPPA and the Report of the Scheme Manager and Annual Governance Statement for NHSPSS and STPS.
- Conclusions on the agency's arrangements in relation to the wider scope areas: Financial Management, Financial Sustainability, Vision, Leadership, and Governance, and Use of Resources to Improve Outcomes.
- Reporting on the agency's arrangements for securing Best Value.
- Providing assurance on the Whole of Government Accounts return.
- Provision of an Annual Audit Report setting out significant matters identified from the audit of the annual report and accounts and the wider scope areas specified in the Code of Audit Practice.

Responsibilities

7. The Code of Audit Practice sets out the respective responsibilities of the agency and the auditor. A summary of the key responsibilities is outlined below.

Auditor's responsibilities

8. The responsibilities of auditors in the public sector are established in the Public Finance and Accountability (Scotland) Act 2000. These include providing an independent opinion on the financial statements and other information reported within the annual report and accounts, and concluding on the SPPA, NHSPSS and STPS arrangements in place for the wider scope areas.

The agency's responsibilities

9. The agency 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 report and accounts, comprising financial statements and other information that give a true and fair view.
- 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.
- Making arrangements to secure Best Value.
- Establishing an internal audit function.

Audit of the annual report and accounts

Introduction

10. The audit of the annual report and 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

11. 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 report and accounts.

12. 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.

13. The materiality levels determined for the audit of the SPPA, NHSPSS and STPS are outlined in [Exhibit 1](#) and [Exhibit 3](#)

Exhibit 1

2025/26 Materiality levels for SPPA

Materiality	Amount
Materiality – based on an assessment of the needs of users of the financial statements and the nature of SPPA’s operations, the benchmark used to determine materiality is gross expenditure based on the audited 2024/25 financial statements. Materiality has been set at 2% of the benchmark.	£0.590 million
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.	£0.290 million

Materiality	Amount
Using professional judgement, performance materiality has been set at 50% of planning materiality.	
Reporting threshold – all misstatements greater than the reporting threshold will be reported.	£30,000
Source: Audit Scotland	

Exhibit 2

2025/26 Materiality levels for NHSPSS and STPS

Materiality	NHSPSS Amount	STPS Amount
Materiality – based on an assessment of the needs of users of the financial statements and the nature of NHSPSS and STPS' operations, the benchmark used to determine materiality is the GAD projected pension liability at 31 March 2026. Materiality has been set at 0.5% of the benchmark.	£260.0 million	£145.0 million
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 50% of planning materiality.	£130.0 million	£72.0 million
Reporting threshold – all misstatements greater than the reporting threshold will be reported.	£0.5 million	£0.5 million

Source: Audit Scotland

14. In certain situations, it may be appropriate to set separate lower materiality levels for specific classes of transactions, account balances, or disclosures in the annual report and accounts.

15. We recognise that transactions relating to the ongoing activities of NHSPSS and STPS are likely to be of interest to the users of the annual report and accounts and we therefore set specific materiality levels as shown in [Exhibit 3](#).

Exhibit 3

Lower specific materiality levels for 2025/26

Materiality	NHSPSS Amount	STPS Amount
Materiality – based on an assessment of the needs of users of the financial statements and the nature of NHSPSS and STPS' operations, the benchmark used to determine materiality is gross expenditure based on the audited 2024/25 financial statements. Materiality has been set at 2% of the benchmark.	£42.0 million	£28.0 million
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 50% of planning materiality.	£21.0 million	£14.0 million
Reporting threshold – all misstatements greater than the reporting threshold will be reported.	£0.5 million	£0.5 million

Source: Audit Scotland

Significant risks of material misstatement to the financial statements

16. The risk assessment process draws on the audit team's cumulative knowledge of SPPA, NHSPSS and STPS, 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.

17. Based on the risk assessment process, significant risks of material misstatement to the financial statements have been identified and these are summarised in [Exhibit 4](#). 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 4.

18. Risk assessment is an iterative and dynamic process. The assessment of risks set out in this Annual Audit Plan and Exhibit 4 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 agency and those charged with governance, where relevant.

Exhibit 4**Significant risks of material misstatement to the financial statements**

Risk of material misstatement	Planned audit response
Fraud caused by management override of controls As stated in ISA 240, management is in a unique position to perpetrate fraud because of management's ability to override controls that otherwise appear to be operating effectively. (SPPA, NHSPSS and STPS)	The audit team will: • Evaluate the design and implementation of controls over journal entry processing. • Make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments. • Test journals entries, focusing on those that are assessed as higher risk, such as those affecting revenue and expenditure recognition around the year-end. • Consider the need to test journal entries and other significant adjustments during the year. • Evaluate significant transactions outside the normal course of business. • Assess changes to the methods and underlying assumptions used to prepare accounting estimates and assess these for evidence of management bias. • Substantive testing of income and expenditure transactions around the year-end to confirm they are accounted for in the correct financial year. • Focussed testing of accounting accruals and prepayments.
Police and Fire year-end balances SPPA had material year-end receivables (£39.6 million) and payables (£16.6 million) balances at 31 March 2025 relating to the payment of pensions on behalf of the Scottish Police Authority and Scottish Fire and Rescue Service. The accuracy of these balances depends on SPPA's calculations, which use data provided by the Scottish Police Authority and Scottish Fire and Rescue Service. (SPPA only)	The audit team will: • Assess the design and implementation of key controls over the processing of the police and fire pension. • Review the year end process for the agreement of police and fire pension scheme balances. • Focused substantive testing of receipts and payments for the police and fire pension schemes.

Risk of material misstatement	Planned audit response
Information supporting scheme valuations Decisions taken by the agency for NHSPSS and STPS are reliant on the work of the Government Actuary Department (GAD). The actuarial valuation methodology relies on significant judgements and assumptions in relation to financial, mortality and demographic factors. (NHSPSS and STPS only)	The audit team will: • Review the work of GAD, focusing on reliability, professional competence, and capability. • Meet with GAD to discuss work practices, validation processes and quality review arrangements to determine whether reliance can be taken in relation to GAD's internal processes. • Review reports to GAD supporting valuation data. • Commission a review of GAD by an independent expert. • Monitor progress with the 2024 scheme valuations and assess the impact on the 2025/26 scheme accounts.

Source: Audit Scotland

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 report and 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 agency 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 agency'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. As part of this we will monitor the provision of information and support to the Audit and Risk Committee (ARC), to enable it to fully discharge its responsibilities.
- **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 agency's arrangements for ensuring resources are deployed to improve strategic outcomes, meet the needs of service users, and deliver continuous improvement. As part of this we will track the agency's progress in delivering Remedy obligations to members.

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

Duty of Best Value

24. The [Scottish Public Finance Manual](#) (SPFM) explains that Accountable Officers have a specific responsibility to ensure that arrangements have been made to secure Best Value. [Best Value in public services: guidance for Accountable Officers](#) is issued by Scottish Ministers and sets out their duty to ensure that arrangements are in place to secure Best Value in public services.

25. Consideration of the arrangements the agency has in place to secure Best Value will be carried out alongside the wider scope audit, and a conclusion on these arrangements will be reported in the Annual Audit Report.

26. Auditors may also carry out specific audit work covering the seven Best Value themes set out in the SPFM. The risk assessment process did not identify a need to carry out specific audit work on any of the themes. Auditors are required to carry out a review of the 'fairness and equality' theme at least once during the audit appointment, and this was carried out as part of a prior year audit.

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 agency, the Auditor General for Scotland, and the Scottish Parliament setting out opinions on the annual report and accounts for SPPA, NHSPSS and STPS.
- An Annual Audit Report to the agency and the Auditor General for Scotland setting out significant matters identified from the audit of the annual report and accounts for SPPA, NHSPSS and STPS, 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 agency 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 report and accounts.

29. Target dates for the audit outputs are set by the Auditor General for Scotland. In setting the target dates for the audit outputs, consideration is given to the target date for approving the annual report and accounts, which is 31 October 2026 for central government non-departmental public bodies, and other similar bodies.

30. The Independent Auditor's Report for SPPA is planned to be issued by the target date of 31 October 2026. However the Independent Auditor's Reports for NHSPSS and STPS and Annual Audit Report are not expected to be issued by this date given the delay in providing data to support the 2024 scheme valuations.

Audit timetable

31. Achieving the timetable for production of the annual report and accounts, supported by complete and accurate working papers, is critical to delivery of the audit to agreed target dates. [Exhibit 5](#) 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 body and reported to those charged with governance, where required.

Exhibit 5

2025/26 audit timetable

Audit activity	Agreed target date	Relevant committee date
Issue of Annual Audit Plan	31 March 2026	2 June 2026
Annual report and accounts (SPPA, NHSPSS and STPS):		
Submission of unaudited annual report and accounts and all working papers to audit team	SPPA by 1 July 2026 NHSPSS and STPS TBC	
Latest date for audit clearance meeting	SPPA by 30 September 2026 NHSPSS and STPS TBC	
Issue of draft Letter of Representation, proposed Independent Auditor's Report, and proposed Annual Audit Report (AAR)	SPPA by 24 October 2026 NHSPSS, STPS and AAR TBC	By 31 October 2026 TBC
Agreement of audited and unsigned annual report and accounts	SPPA by 24 October 2026 NHSPSS and STPS TBC	By 31 October 2026 TBC
Approval by those charged with governance and signing of audited annual report and accounts	SPPA by 24 October 2026 NHSPSS and STPS TBC	By 31 October 2026 TBC
Signing of Independent Auditor's Report and issue of Annual Audit Report	SPPA by 31 October 2026 NHSPSS and STPS TBC	By 31 October 2026 TBC
Certification of Whole of Government Accounts	TBC	N/a

Source: Audit Scotland

Audit fee

32. SPPA, NHSPSS and STPS audit fees are determined in line with Audit Scotland's fee setting arrangements. The proposed audit fees for the 2025/26 audit are set at the baseline levels of:

- SPPA: £30,380 (2024/25: £29,120)
- NHSPSS: £79,210 (2024/25: £75,920)
- STPS: £75,300 (2024/25: £72,170)

33. 2024/25 values reflect the original agreed audit fees and exclude additional fees for each body.

34. In setting the audit fee, it is assumed that the agency has effective governance arrangements in place and the complete annual report and 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.

Other matters

Internal audit

35. The agency 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.

36. 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

37. 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](#).

38. 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.

39. 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.

40. 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.

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

SPPA, NHSPSS and STPS

Annual Audit Plan 2025/26



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