

NHS Fife

Annual Audit Plan 2021/22



 AUDIT SCOTLAND

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Introduction

Summary of planned audit work

1. This document summarises the work plan for our 2021/22 external audit of NHS Fife. The main elements of our work include:

- evaluation of the key controls within the main accounting systems
- provision of an Independent Auditor's Report
- an audit opinion on regularity and other statutory information published within the Annual Report and Consolidated Accounts including the Performance Report, the Governance Statement and the audited part of the Remuneration and Staff Report
- consideration of arrangements in relation to the audit dimensions: financial management, financial sustainability, governance and transparency and value for money that frame the wider scope of public sector audit
- consideration of Best Value arrangements
- review NHS Fife's participation in the National Fraud Initiative.

Impact of Covid-19

2. The coronavirus disease (Covid-19) pandemic has had a significant impact on public services and public finances, and the effects will be felt well into the future.

3. The Auditor General for Scotland, the Accounts Commission and Audit Scotland continue to assess the risks to public services and finances from Covid-19 across the full range of our audit work, including annual audits and the programme of performance audits. The well-being of audit teams and the delivery of high-quality audits remain paramount. Changes in our approach may be necessary and where this impacts on annual audits, revisions to this Annual Audit Plan may be required.

Adding value

4. We aim to add value to NHS Fife through our external audit work by being constructive and forward looking, by identifying areas for improvement and by recommending and encouraging good practice. In so doing, we will help NHS Fife promote improved standards of governance, better management and decision making and more effective use of resources. Additionally, we attend meetings of the Audit and Risk Committee and actively participate in discussions.

Respective responsibilities of the auditor and NHS Fife

5. The [Code of Audit Practice \(2016\)](#) sets out in detail the respective responsibilities of the auditor and NHS Fife. Key responsibilities are summarised below.

Auditor responsibilities

6. Our responsibilities as independent auditors are established by the Public Finance and Accountability (Scotland) Act 2000 and the [Code of Audit Practice](#) (including [supplementary guidance](#)) and guided by the Financial Reporting Council's Ethical Standard.

7. Auditors in the public sector give an independent opinion on the financial statements and other information within the annual report and accounts. We also review and report on the arrangements within NHS Fife to manage its performance, regularity and use of resources. In doing this, we aim to support improvement and accountability.

NHS Fife responsibilities

8. NHS Fife is responsible for maintaining accounting records and preparing financial statements that give a true and fair view.

9. NHS Fife has the primary responsibility for ensuring the proper financial stewardship of public funds, compliance with relevant legislation and establishing effective arrangements for governance, propriety and regularity that enable them to deliver their objectives.

Managing the transition to 2022/23 audits

10. Audit appointments are usually for five years but were extended to six years due to Covid-19. 2021/22 is the final year of the current appointment and we will work closely with our successors to ensure a well-managed transition.

Financial statements audit planning

Materiality

11. Materiality is an expression of the relative significance of a matter in the context of the financial statements as a whole. We are required to plan our audit to determine with reasonable confidence whether the financial statements are free from material misstatement. The assessment of what is material is a matter of professional judgement over both the amount and the nature of the misstatement.

Materiality levels for the 2021/22 audit

12. We assess materiality at different levels as described in [Exhibit 1](#). The materiality values for NHS Fife are set out in [Exhibit 1](#).

Exhibit 1

2021/22 Materiality levels for NHS Fife

Materiality	Amount
Planning materiality – This is the figure we calculate to assess the overall impact of audit adjustments on the financial statements. It has been set at 1% of gross expenditure for the year ended 31 March 2022 based on the latest audited financial statements for 2020/21.	£14 million
Performance materiality – This acts as a trigger point. If the aggregate of errors identified during the financial statements audit exceeds performance materiality, this would indicate that further audit procedures should be considered. Using our professional judgement, we have assessed performance materiality at 60% of planning materiality.	£8.4 million
Reporting threshold (i.e. clearly trivial) – We are required to report to those charged with governance on all unadjusted misstatements more than the 'reporting threshold' amount.	£200,000

Source: Audit Scotland

Significant risks of material misstatement to the financial statements

13. Our risk assessment draws on our cumulative knowledge of NHS Fife, its major transaction streams, key systems of internal control and risk management processes. Also, it is informed by our discussions with management, meetings with internal audit, attendance at committees and a review of supporting information.

14. Based on our risk assessment process, we identified the following significant risks of material misstatement to the financial statements. These are risks which have the greatest impact on our planned audit procedures. [Exhibit 2](#) summarises the nature of the risk, the sources of assurance from management arrangements and the further audit procedures we plan to perform to gain assurance over the risk.

Exhibit 2

2021/22 Significant risks of material misstatement to the financial statements

Significant risk of material misstatement	Sources of assurance	Planned audit response
<p>1. Risk of material misstatement due to fraud caused by the management override of controls.</p> <p>As stated in International Standard on Auditing (UK) 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.</p>	<p>Owing to the nature of this risk, assurances from management are not applicable in this instance.</p>	<ul style="list-style-type: none"> • Test transactions and journals at the year-end and post-closing entries and focus on significant risk areas. • Review of accounting estimates. • Focused testing of accruals and prepayments, including the holiday pay accrual. • Evaluation of significant transactions that are outside the normal course of business.
<p>2. Estimation in the valuation of land and buildings.</p> <p>NHS Fife held land and buildings with a NBV of £450 million as at 31 March 2021, with land and buildings revaluated on a five-year rolling basis. An external valuer</p>	<ul style="list-style-type: none"> • Valuations of all land and building assets are reassessed under a five-year programme of professional valuations by the District Valuer and 	<ul style="list-style-type: none"> • Evaluate the competence, capabilities, and objectivity of the professional valuer. • Obtain an understanding of the management's involvement in the valuation process to assess if appropriate oversight has occurred. • Review of reports from the District Valuer to confirm overall asset valuation movements. • Sample testing of valuation amounts applied to individual assets.

Significant risk of material misstatement	Sources of assurance	Planned audit response
<p>carries out valuations of land and buildings.</p> <p>There is a significant degree of subjectivity in the valuation of land and buildings. Valuations are based on specialist and management assumptions and changes in these can result in material changes to valuations.</p>	<p>adjusted in intervening years to take account of movements in prices since the latest valuation.</p>	<ul style="list-style-type: none"> Engage with the District Valuer to gain an understanding of the valuation process including any changes in assumptions. Obtain evidence to support indexation. Sample testing of indexation calculations applied to individual assets.

Source: Audit Scotland

15. As set out in International Standard on Auditing (UK) 240: *The auditor's responsibilities relating to fraud in an audit of financial statement*, there is a presumed risk of fraud in the recognition of revenue. We have considered the risk of fraud over income recognition (ISA 240). We also considered the risk of fraud over expenditure, as most public bodies are net spending bodies, and the risk of external fraud (in accordance with Practice Note 10 (Audit of Financial Statements and Regularity of Public Sector Bodies in the UK)).

16. We have rebutted the presumption that a material risk exists, with the exception of management override, as noted above. This is on the basis of

- there are generally no incentives for staff to commit fraudulent financial reporting (although RRL targets are relevant to our assessment of Management Override)
- most income is provided by the Scottish Government and other public bodies and is easily verified
- most expenditure is in low risk areas where individual transactions are well-controlled (for example salaried staff costs in a well-defined grading system) and individual transactions are relatively small in scale, with management or board approval required for material transactions
- evidence of external fraud from counter fraud services and the National Fraud Initiative does not indicate material risks
- experience in the sector and of the audit of NHS Fife, including a review of past misstatements.

17. Our audit testing is directed towards testing significant and unusual transactions and towards assessing accounting estimates to address any residual risk, as part of

our standard fraud procedures. We have not, therefore, incorporated specific work into our audit plan in these areas over and above our standard audit procedures.

Other areas of audit focus

18. 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 risk, we do not consider these to represent significant risks. We will keep these areas under review as our audit progresses. If our assessment of risk changes and we consider these risks to be significant, we will communicate this to management and those charged with governance and revise our planned audit approach accordingly.

19. The areas of specific audit focus are:

- CNORIS claims provision: there is a risk of material misstatement due to the level of estimation and judgement in assessing the potential value of clinical negligence claims. These provisions are generally represented by reimbursement amounts too. We will perform verification of the CNORIS process and 'reliance on an expert' audit, and sample testing of CNORIS claims and associated reimbursements.
- FHS - payments to primary care practitioners: there is a risk of material misstatement due to reduced verification checks and uncertainty about the extent of improvement made by NHS NSS in responding to the weaknesses reported by the service auditor in 2020/21, and we await the outcome of the 2021/22 review. We will test the reconciliation of the ledger to NSS output reports and will review the findings of the Service Auditor. We may review counter fraud activity and undertake detailed analytical review at individual practitioner level, in areas where the service auditor is unable to confirm the operation of appropriate controls. We will liaise with the external auditor of NSS on any approach to additional substantive testing.

Group Consideration

20. As group auditors, we are required under International Standard on Auditing (UK) 600: *Audits of group financial statements (including the work of component auditors)* to obtain sufficient appropriate audit evidence on which to base our audit opinion on the group financial statements.

21. NHS Fife has a group which comprises component entities, including Fife Health Charity (the endowment fund) and Fife Integration Joint Board. The audits of the financial information of some of the components are performed by other auditors. We plan to place reliance on the work of the component auditors. We will obtain sufficient appropriate audit evidence in relation to the consolidation process and the financial information of the components on which to base our group audit opinion.

Audit risk assessment process

22. Audit risk assessment is an iterative and dynamic process. Our assessment of risks set out in this plan may change as more information and evidence becomes available during the progress of the audit. Where such changes occur, we will advise management and where relevant, report them to those charged with governance.

Audit dimensions and Best Value

Introduction

23. The [Code of Audit Practice](#) sets out the four dimensions that frame the wider scope of public sector audit. The Code of Audit Practice requires auditors to consider the adequacy of the arrangements in place for the audit dimensions in audited bodies.

Audit dimensions

24. The four dimensions that frame our audit work are shown in [Exhibit 3](#).

Exhibit 3

Audit dimensions



Source: Code of Audit Practice

25. In summary, the four dimensions cover the following:

- **Financial management** – financial management is concerned with financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively.
- **Financial sustainability** – as auditors, we consider the appropriateness of the use of the going concern basis of accounting as part of the annual

audit. We will also comment on financial sustainability in the longer term. We define this as medium term (two to five years) and longer term (longer than five years).

- **Governance and transparency** – governance and transparency is concerned with the effectiveness of scrutiny and governance arrangements, leadership, and decision-making and transparent reporting of financial and performance information.
- **Value for money** – value for money refers to using resources effectively and continually improving services.

26. We have prior year recommendations covering the wider scope of public sector audit and we will follow-up and report on progress.

Duty of Best Value

27. [Ministerial Guidance to Accountable Officers](#) for public bodies and the [Scottish Public Finance Manual](#) (SPFM) explain that accountable officers have a specific responsibility to ensure that arrangements have been made to secure Best Value. We will be carrying out a high-level review to confirm that such arrangements are in place within NHS Fife.

28. Additionally, as part our Best Value work, we will be considering the Best Value characteristic “fairness and equality” within NHS Fife.

29. We have identified audit risks in the areas set out in [Exhibit 4](#). This exhibit sets out the risks, sources of assurance from management arrangements and the further audit procedures we plan to perform to gain assurances over the risks.

Exhibit 4

2021/22 Audit dimension risks

Description of risk	Sources of assurance	Planned audit response
<p>3 Fairness and equality</p> <p>In accordance with annual planning guidance issued by Audit Scotland, auditors may carry out specific audit work covering the seven BV characteristics set out in the Scottish Public Finance Manual.</p> <p>There is an expectation that equalities will be advanced through the audit process, and auditors have been advised to carry out work on the Fairness and Equality characteristic at</p>		<p>We will review recent NHS Fife activity on Fairness and Equality including a review of biennial reporting and action plans</p>

Description of risk	Sources of assurance	Planned audit response
<p>least once during the audit appointment.</p> <p>Auditors should therefore aim to cover that area in 2021/22 if they have not done so in an earlier year.</p>		
<p>4 Cyber security</p> <p>NHS Fife recognises the threat to cyber security as high risk due to legacy systems which are now unsupported.</p> <p>Should a cyber attack occur there are associated risks of data breach and a sustained period of system loss.</p>		<p>We will monitor NHS Fife's response to the risk providing comment in our Annual Audit Report.</p>

Source: Audit Scotland

Reporting arrangements, timetable, and audit fee

Reporting arrangements

30. Audit reporting is the visible output for the annual audit. All Annual Audit Plans and the outputs, as detailed in [Exhibit 5](#), and any other outputs on matters of public interest will be published on our website: www.audit-scotland.gov.uk.

31. Matters arising from our audit will be reported on a timely basis and will include agreed action plans. Draft management reports will be issued to the relevant officers to confirm factual accuracy.

32. We will provide an independent auditor's report to NHS Fife, the Scottish Parliament and the Auditor General for Scotland setting out our opinions on the Annual Report and Consolidated Accounts. We will provide NHS Fife and the Auditor General for Scotland with an annual report on the audit containing observations and recommendations on significant matters which have arisen during the audit.

33. [Exhibit 5](#) outlines the target dates for our audit outputs, and we aim to issue the independent auditor's report by 2 August 2022. We acknowledge this will be challenging due to the ongoing pressures and uncertainties caused by Covid-19.

Exhibit 5 2022/22 Audit outputs



Audit Output	Target date	Audit and Risk Committee Date
Annual Audit Plan	28/02/2022	17/03/2022
Signed Independent Auditor's Report	29/07/2022	02/08/2022
Annual Audit Report	29/07/2022	02/08/2022

Source: Audit Scotland

Timetable

34. To support an efficient audit, it is critical that the timetable for producing the annual report and accounts for audit is achieved. We have included a proposed timetable for the audit at [Exhibit 6](#) that has been discussed with management.

Exhibit 6

 Key stage	 Provisional Date
Latest submission date for the receipt of the unaudited annual report and accounts with complete working papers package.	16 May 2022
Latest date for final clearance meeting with the Director of Finance and other relevant officers	30 June 2022
Issue of draft Letter of Representation, proposed Independent Auditor's Report, draft Annual Audit Report to the Director of Finance	14 July 2022
Issue of Letter of Representation, proposed Independent Auditor's Report, draft Annual Audit Report, and audited unsigned Annual Report and Consolidated Accounts to NHS Fife Audit and Risk Committee	21 July 2022
Issue of Annual Audit Report to those charged with governance (the Board)	21 July 2022
Signed Independent Auditor's Report and issue of final Annual Audit Report	02 August 2022

Source: Audit Scotland

Audit fee

35. The proposed audit fee for the 2021/22 audit of NHS Fife is £164,130 (2020/21: £160,970). In determining the audit fee, we have taken account of the risk exposure of the NHS Fife, the planned management assurances in place and the level of reliance we plan to take from the work of internal audit.

36. Where our audit cannot proceed as planned through, for example, late receipt of unaudited annual report and accounts, the absence of adequate supporting working papers or being unable to take planned reliance from the work of internal audit, a supplementary fee may be levied. An additional fee may also be required in relation to any work or other significant exercises out with our planned audit activity.

Other matters

Internal audit

37. International standards on Auditing (UK) 610: *Considering the work of internal audit* requires us to:

- consider the activities of internal audit and their effect on external audit procedures;
- obtain an understanding of internal audit activities to inform our planning and develop an effective audit approach that avoids duplication of effort;
- perform a preliminary assessment of the internal audit function when there is scope for relying on internal audit work which is relevant to our financial statements' responsibilities; and
- evaluate and test the work of internal audit, where use is made of that work for our financial statements responsibilities to confirm its adequacy for our purposes.

38. From our initial review of the internal audit plans, we do not plan to place formal reliance on internal audit's work for our financial statements' responsibilities.

Independence and objectivity

39. Auditors appointed by the Auditor General for Scotland or Accounts Commission must comply with the [Code of Audit Practice](#) and relevant supporting guidance. When auditing the financial statements, auditors must also comply with professional standards issued by the Financial Reporting Council and those of the professional accountancy bodies. These standards impose stringent rules to ensure the independence and objectivity of auditors. Audit Scotland has robust arrangements in place to ensure compliance with these standards including an annual *'fit and proper'* declaration for all members of staff. The arrangements are overseen by the Director of Audit Services, who serves as Audit Scotland's Ethics Partner.

40. The engagement lead (appointed auditor) for NHS Fife is Brian Howarth, Audit Director. Auditing and ethical standards require the appointed auditor to communicate any relationships that may affect the independence and objectivity of audit staff. We are not aware of any such relationships pertaining to the audit of NHS Fife.

Quality control

41. International Standard on Quality Control (UK) 1 (ISQC1) requires a system of quality control to be established, as part of financial audit procedures, to provide reasonable assurance that professional standards and regulatory and legal requirements are being complied with and that the independent auditor's report or opinion is appropriate in the circumstances.

42. The foundation of our quality framework is our Audit Guide, which incorporates the application of professional auditing, quality and ethical standards and the [Code of Audit Practice](#) (and supporting guidance) issued by Audit Scotland and approved by the Auditor General for Scotland. To ensure that we achieve the required quality standards, Audit Scotland conducts peer reviews and internal quality reviews. Additionally, the Institute of Chartered Accountants of Scotland (ICAS) have been commissioned to carry out external quality reviews.

43. As part of our commitment to quality and continuous improvement, Audit Scotland will periodically seek your views on the quality of our service provision. We welcome feedback at any time, and this may be directed to the engagement lead.

NHS Fife

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