Highland Council Pension Fund

Financial year ended 31 March 2022

Prepared for the Pensions Committee and the Controller of Audit

Contents

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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our external audit process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Highland Council Pension Fund or all weaknesses in your internal controls. This report has been prepared solely for your benefit and Audit Scotland (under the Audit Scotland Code of Practice 2016). We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

Key messages

This is our report to the Pensions Committee and the Controller of Audit and for our audit on the financial year ended 31 March 2022. Based on the findings to date, we plan to issue an unmodified audit opinion on the annual report and accounts, however we would note that our audit work has yet to be fully concluded. We thank management for all their assistance during the audit process.

01 Materiality

We re-calculated our materiality based on the unaudited annual report and accounts. The benchmark of 1% of gross investments remained the same. This resulted in:

- Materiality of £23.673 million and a performance materiality (75% of materiality) of £17.754 million
- All audit adjustments above £250,000 were reported to management and captured in this report.

02 Financial statement audit risks

At planning, in accordance with the ISAs (UK) and FRC Practice Note 10 we have identified the following significant financial statement audit risks:

- Management override of controls (ISA UK 240) Valuation of level 3 investments as at 31 March 2022.
- We have no matters to bring to your attention arising from our work over these significant audit risks.

03 Other audit matters

Our final report summarises a number of other audit matters, including:

- We have concluded that The Highland Council Pension Fund ('the Pension Fund') meets the definition of a going concern, reflecting on FRC Practice Note 10 considerations.
- The accounts contain areas of estimation and judgement. Significant estimates relate to the valuation of level 3 investments. Our testing over these did not identify any indication of management bias or error.
- We set out our roles and responsibilities on fraud. During the course of our work we did not identify fraud and/or material error.

There were a number of disclosure adjustments. These are detailed in Appendix 1 and are not considered material to the accounts.

04 Wider Scope Audit

In accordance with the Code we determined that the Pension Fund meet the definition of a smaller body. This is based on the Pension Fund's income and expenditure transactions and balances held being relatively smaller than other public bodies and the financial statements are considered less complex.

In accordance with the Code we have concluded in this report on your governance statement and the Pension Fund's financial sustainability arrangements. During our audit we did not identify any further areas of wider scope risk.

05 Our Audit Fee

Our audit fee, set out in our audit plan, of £33,580 was our final audit fee. There were no non-audit services during the year and we did not need to vary our agreed fee.

Introduction

Scope of our audit work

This report is a summary of our findings from our external audit work for the financial year ended 31 March 2022 at the Pension Fund. The scope of our audit was set out in our External Audit Plan communicated to the Pensions Committee in March 2022.

The main elements of our audit work in 2021/22 have been:

- An audit of the Pension Fund's annual report and accounts for the financial year ended 31 March 2022; and
- Consideration of the Pension Funds financial sustainability and the Governance Statement disclosures, as required under the smaller body classification, within the Audit Scotland Code of Practice (2016).

Our work has been undertaken in accordance with International Standards of Auditing (ISAs) (UK) and the Code.

This report is addressed to the Accountable Officer and the Auditor General for Scotland and will be published on Audit Scotland's website www.audit-scotland.gov.uk in due course.

Status of the audit

As at the 23 September 2022 our audit is substantively complete subject to the following audit procedures:

- Final procedures over the valuation of level 3 assets and classification of level 2 assets
- Final confirmation that the classification between Level 1 and 2 assets is appropriate
- Final documentation of audit work around disclosure notes
- Final subsequent events procedures
- Final Engagement Leader review.

Responsibilities

The Pension Fund is responsible for preparing an annual report and accounts which show a true and fair view and that are in accordance with the accounts direction from Scottish Ministers. The Pension Fund is also responsible for establishing appropriate and effective arrangements for governance, propriety and regularity that enable it to successfully deliver its objectives.

The recommendations or risks identified in this report are only those that have come to our attention during our normal audit work and may not be all that exist. Communication in this report of matters arising from the audit or of risks or weaknesses does not absolve management from its responsibility to address the issues raised and to maintain an adequate system of control.

Adding value through our audit work

We aim to add value to the Pension Fund throughout our audit work. In delivering our audit we use a dedicated public sector audit team. This ensures our team have a comprehensive understanding of Pension Fund and the wider public sector to focus on key areas of risk relevant to your financial statements.

Audit of the annual report and accounts

Key messages and judgements

We plan to issue an unmodified audit opinion on the annual report and accounts.

There were no adjustments to the primary financial statements. There were no unadjusted differences to the financial statements. We raised a number of minor disclosure adjustments identified from our review of the annual report and accounts. We do not consider these to be material. Further details are provided in *Appendix 1.*

We would like to thank management for all their assistance during the year in ensuring the delivery of the audit, to the timescales agreed at the start of the financial year.

Our audit opinion

For the financial year ended 31 March 2022 we plan to issue an unmodified opinion on the annual report and accounts, subject to the satisfactory conclusion of outstanding work. As reported in the independent auditor's report:

- the financial statements give a true and fair view and were properly prepared in accordance with applicable law and the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (the 2021/22 Code)
- have been properly prepared in accordance with IFRSs as adopted by the European Union, as interpreted and adapted by the 2021/22 Code
- have been prepared in accordance with the requirements of the Local Government (Scotland) Act 1973, The Local Authority Accounts (Scotland) Regulations 2014, and the Local Government in Scotland Act 2003.
- the information given in the Management Commentary, Annual Governance Statement and the Governance Compliance Statement for the financial year is consistent the with financial statements and have been prepared with statutory guidance issued under the Local Government in Scotland Act 2003; Delivering Good Governance in Local Government: Framework (2016) and The Local Government Pension Scheme (Scotland) regulations 2018 respectively.

The audit process

In accordance with our annual external audit plan, our audit work commenced in July 2022. We received the draft primary financial statements in line with our agreed timetable. There were no audit adjustments to the draft primary financial statements. There were no unadjusted differences to the draft financial statements. We also identified a number of disclosure adjustments in respect of the draft financial statements. A full listing of disclosure misstatements is detailed in Appendix 1. We do not consider these to be material to the financial statements.

Materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law. We updated our audit materiality to reflect the 2021/22 draft financial statements. It is set at £23.673 million, representing 1% of gross investments. Performance materiality was set at £17.754 million, representing 75% of our calculated materiality. We report to management any difference identified over £250,000 (being the maximum trivial threshold allowable under Audit Scotland planning guidance).

Responding to significant financial statement risks

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

This section provides commentary on the significant audit risks communicated in the Audit Plan.

Risks identified in our Audit Plan	Commentary

Management override of controls
 	
As set out in ISA 240 there is a presumed risk that management override of controls is present in all entities. This risk area includes the potential for management to use their judgement to influence the financial statements as well as the potential to override Pension Fund's controls for specific transactions.
We consider those key judgements that are most susceptible to significant audit risk of management override are those over the valuation of investments. These are areas where management has the potential to influence the financial statements through estimate and judgement. This includes manual journals as well as critical judgements or estimates.
	• We considered the design of controls in place over key accounting estimates and judgements through performance of walkthrough procedures.
	• We reviewed accounting estimates for management bias / indication of fraud that could result in material misstatement. This included review of estimates as at 31 March 2022.
	Journals testing including:
	  • Assessment of the design of controls in place over journal entries, including journal preparation, authorisation and processing onto the financial ledger;
	  • Risk assessment of the journals population to identify large or unusual journal entries, such as those that are not incurred in the normal course of business, or those entries that may be indicative of fraud or error that could result in material misstatement. We tested these journals to ensure they are appropriate and suitably recorded in the financial ledger;
	  • Target testing of transactions around the financial year end, reviewing large journals and those which appear unusual to understand the rationale for the transaction.
	
	Conclusion
	
	Through our audit procedures performed we found that there was no evidence of management override in our testing of transactions tested. We did not identify any indication of fraud or inappropriate management bias in accounting estimates that could result in a material misstatement.

Risks identified in our Audit Plan	Commentary
Valuation of level 3 investments (valuation) Under ISA 315 significant risks often relate to significant non-routine transactions and judgemental matters. Investments held by the Fund are subject to market price fluctuations and a degree of estimation. Investments are valued on a fair value hierarchy. Level 1 investments are those for which quoted market price information is available to validate fair value. Level 2 investment are those where there is no quoted market value but for which observable inputs are available based on information to support the valuation of investments. Subsequently, there is limited estimation or judgement in the valuation of these assets. Level 3 investments are those assets and liabilities where at least one input that could have a significant effect on the instrument's valuation is not based on observable market data. As at 31 March 2021 the Pension Fund held £368 million of Level 3 investments. Of the level 3 investments, the Pension Fund held investments which given their nature and market conditions, contain increased levels of volatility in valuation. As a result we consider these assets to be of more significant risk of material misstatement. In addition, as at 31 March 2021, the Pension Fund held £15.574 million in equity options (derivatives), including complex derivatives. Given the judgement and complexity around the valuation of these investments we attach a significant risk of material misstatement. We therefore have significant risk of misstatement over: • Pooled property valuations (valuation) • Complex derivative investments (valuation)	• We performed walkthroughs of the controls and procedures over the valuation of investments, including understanding of controls in place at Fund Managers over valuations through obtaining their latest ISAE 3402 controls report or equivalent; • We considered the competence and expertise of the Fund Managers as experts to value investments at the year end; • We agreed Fund Manager investment confirmations as at 31 March 2022 and reconciled these to Custodian Report at 31 March 2022 and the Pension Fund accounts; • We considered the Fund Manager reports as at 31 March 2022 to identify any reported uncertainty in relation to the investment values; • We obtained valuations as at 30 June 2022 and performed roll back procedures to obtain assurance over valuations as at 31 March 2022. • For other investments with observable market data (level 2 and level 1) we independently verified the valuation of a sample of these investments providing assurance over valuation approach from Fund Manager. **Conclusion** As at 31 March 2022, the Pension Fund held £535 million of investments within level 3 investments. These are primarily unit Trust pooled property investments, private equity and property debt. Through our audit procedures performed we did not identify any exceptions in our review and testing over level 3 pension assets held. Level 3 investments were agreed to third party Fund Manager confirmations and custodian reports. Our audit procedures did not indicate any errors in the valuation applied. We do note that one fund manager (BentallGreenOak) had a qualified opinion within their internal controls report to 31/12/20. We have reviewed the report and correspondence from the fund manager, and are satisfied that the qualification does not have a direct impact on the controls around the investments held by Highland Council Pension Fund and will have no impact on the valuation of it's investments.

We did not identify any further areas of significant risk through the course of our audit work.

Significant estimates and judgements

The Pension Fund's annual report and accounts contain limited areas of estimation and judgement. The one material area of estimation is in relation to level 2 and level 3 investment. This has been confirmed by Senior Officers (Management) and confirmed in our audit testing including review of disclosures.

judgement or estimate	Summary of officer's approach	Audit Comments	Assessment
Level 2 and Level 3 Investments	The Pension Fund appoint a range of external fund managers to manage their investments based on agreed investment criteria. The valuation in the accounts reflects that provided by the Pension Fund Custodian, Northern Trust. Northern Trust provide performance information throughout the year which allows Officers to review and scrutinise performance throughout the year. The Pension Fund asset performance is reviewed quarterly at the Investment Sub Committee (ISC) and the Fund's investment advisors Aon provide an analysis of changes in asset values. Also in the year end accounts there is an analysis of movements in investments during the year which act as a review on previous account estimates as movements must be explained. Source data from the Custodian is reconciled by Officers to date from the Fund Managers. Any anomalies are investigated as part of the monthly reconciliation process. For Level 3 Assets valuations are provided by Fund Managers alongside the method of Valuation which is reviewed by Officers.	For Level 2 investments we have reviewed the approach and assumptions used in valuing the assets and are satisfied these are appropriate. For Level 3 Investments we are satisfied that the Pension fund's approach to valuing the investments, including the use of independent Fund Managers are appropriate. We have considered the ISAE 3402 controls report (or equivalent) at the Fund Managers to gain assurance around the controls in place to arrive at a valuation. We did not identify any indication of management bias in the underlying assumptions applied in the estimate and found that Management have disclosed the key sensitivities surrounding these in the draft financial statements.	[Light purple]

Assessment

- Dark Purple — We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- Blue — We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
- Grey — We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- Light Purple — We consider management's process is appropriate and key assumptions are neither optimistic or cautious

Others areas of estimation

judgement or estimate	Summary of management's approach	Audit Comments	Assessment
IAS 26 Defined benefit pension liabilities	CIPFA's Code of Practice on Local Authority Accounting 2021/22 requires administering authorities of LGPS Funds that prepare Pension Fund accounts to disclose what IAS 26 refers to as the actuarial present value of promised retirement benefits. The Pension Fund engage Hymans Robertson provide an annual IAS 26 actuarial valuation of the Pension Fund's defined benefit pension liabilities. There are a number of assumptions contained within the valuation, including: discount rate; mortality rates; and, future salary projections. These key assumptions are discussed with the actuary to inform the report. These are predominantly informed by the actuaries recommended assumptions. Management review the draft actuarial valuation.	The IAS 26 represents a disclosure requirement in the accounts rather than a primary financial statement. Using the work of PricewaterhouseCoopers (PwC) we reviewed the key assumptions underpinning the actuarial valuation. We are satisfied that the assumptions adopted were appropriate for Pension Fund and that those applied were considered reasonable i.e. within our acceptable tolerances. We did not identify any indication of management bias in the underlying assumptions applied in the estimate and found that Management have disclosed the key sensitivities surrounding these in the draft financial statements.	[Light purple]

Internal control environment

In accordance with ISA requirements we have developed an understanding of the control environment in place within the Pension Fund. Our audit is not controls based and we have not placed reliance on controls operating effectively as our audit is fully substantive in nature. We did this through a walkthrough of key controls within the Pension Fund including investment valuations, benefits paid, contributions and journals. We identified no material weaknesses or areas of concern from this work which would have caused us to alter the planned approach as documented in our plan.

Detecting Irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, to detect material misstatements in respect of irregularities, including fraud. Owing to the inherent limitations of an audit, there is an unavoidable risk that material misstatements in the financial statements may not be detected, even though the audit is properly planned and performed in accordance with the ISAs (UK).

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Pension Fund and determined that the most significant which are directly relevant to specific assertions in the financial statements are those related to the reporting frameworks; International Financial Reporting Standards and the CIPFA Code of Practice on Local Authority Accounting 2021/22 (the 2021/22 Code).
- We enquired of Officers and the Pensions Committee, concerning the Pension Fund's policies and procedures relating to the identification, evaluation and compliance with laws and regulations; the detection and response to the risks of fraud; and the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.
- We enquired of Officers (Management) and the Pensions Committee, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.
- We assessed the susceptibility of the Pension Fund's financial statements to material misstatement, including how fraud might occur, by evaluating management's incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk of management override of controls. We determined that the principal risks were in relation to journal entries that altered the Pension Fund's financial performance for the year and potential management bias in determining accounting estimates. Our audit procedures involved are documented within our response to the significant risk of management override of controls on Page 6.
- These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. However, detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as those irregularities that result from fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.
- The team communications in respect of potential non-compliance with relevant laws and regulations, included the potential for fraud in expenditure recognition and significant accounting estimates.
- In assessing the potential risks of material misstatement, we obtained an understanding of:
  - The Pension Fund's operations, including the nature of its operating revenue and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
  - The Pension Fund's control environment, including the policies and procedures implemented to ensure compliance with the requirements of the financial reporting framework.

Other key elements of the financial statements

As part of our audit there were other key areas of focus during the course of our audit. Whilst not considered a significant risk, these are areas of focus either in accordance with the Audit Scotland Code of Audit Practice or ISAs or through due to their complexity or importance to the user of the accounts.

Issue	Commentary
Matters in relation to fraud and irregularity	It is the Pension Fund's responsibility to establish arrangements to prevent and detect fraud and other irregularity. As auditors, we obtain reasonable assurance that the financial statements as a whole are free from material misstatement, whether due to fraud or error. We obtain annual representation from management regarding managements assessment of fraud risk, including internal controls, and any known or suspected fraud or misstatement. We have also made inquires of internal audit around internal control, fraud risk and any known or suspected frauds in year. We have not been made aware of any other incidents in the period and no other issues have been identified during the course of our audit procedures.
Accounting practices	We have evaluated the appropriateness of the Pension Fund's accounting policies, accounting estimates and financial statement disclosures. Disclosures and accounting policies are in line with the FReM and we have no matters to report.
Matters in relation to related parties	We are not aware of any related parties or related party transactions which have not been disclosed.
Matters in relation to laws and regulations	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
Other information	We are required to give an opinion on whether the other information published together with the audited financial statements (including the Annual Report), is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. No inconsistencies have been identified and we plan to issue an unmodified opinion in this respect.
Opinion on other aspects of the annual report and accounts	The information given in the Management Commentary is consistent with the financial statements and that report has been prepared in accordance with statutory guidance issued under the Local Government in Scotland Act 2003. The information given in the Annual Governance Statement is consistent with the financial statements and that report has been prepared in accordance with the Delivering Good Governance in Local Government: Framework (2016). The information given in the Governance Compliance Statement is consistent with the financial statements and has been prepared in accordance with The Local Government Pension Scheme (Scotland) Regulations 2018.

Issue	Commentary
Matters on which we report by exception	We are required by the Auditor General for Scotland to report to you if, in our opinion: adequate accounting records have not been kept; or the financial statements are not in agreement with the accounting records; or we have not received all the information and explanations we require for our audit there has been a failure to achieve a prescribed financial objective. We have nothing to report in respect of these matters.
Annual Governance statement	The governance statement outlines the governance framework in place at the Pension Fund. The Annual Governance Statement is consistent with the financial statements and the report is prepared in accordance with the Delivering Good Governance in Local Government: Framework (2016). There were no matters arising from our review of the governance statement that we want to draw attention to.
Written representations	A letter of representation has been requested from the Head of Corporate Finance, including specific representations, which is included in the Pensions Committee papers. Specific representations have been requested from officers in line with prior years and confirms as auditors all records have been made available to us.
Going concern	In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies. Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by Pension Fund meets this criteria, and so we have applied the continued provision of service approach. In accordance with Audit Scotland guidance: Going concern in the public sector, we have therefore considered Officer's assessment of the appropriateness of the going concern basis of accounting and conclude that: • a material uncertainty related to going concern has not been identified • Officer's (Management's) use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Wider scope audit – Smaller body

As set out in our Audit Plan, Pension Fund meets the definition of a smaller body in accordance with the Audit Scotland Code of Practice (2016). Therefore, as auditors we are required to include in our annual report commentary on arrangements as they relate to financial sustainability and the Annual Governance Statement. Our work on the Annual Governance Statement, and conclusions are set out on page 12 of this report. Below we have captured our commentary and conclusions on financial sustainability and other matters of interest during the year.

Wider scope dimension	Wider scope risk identified in our audit plan	Wider scope audit response and findings	Grant Thornton conclusion
Governance arrangements (Audit Scotland planning guidance consideration)	No significant risks identified within our audit planning.	Governance The Pension Fund is required to report annually a Governance Compliance Statement in accordance with The Local Government Pension Scheme (Scotland) Regulations 2018 outlining how the Council has complied with best practice. One area Officers have highlighted as not operating within best practice is around the frequency of meetings where best practice would be for the administering authority's main committee / committees to meet at least quarterly. The Pensions Committee and Pensions Board meet twice during the year. Officers have reviewed the business covered at the Pensions Committee and benchmarked against other governance structures in places and are satisfied that business is covered adequately in two meetings. In addition, the Investment Sub committee meet quarterly to ensure there is adequate oversight of Fund Manager performance in a timely manner.	We did not identify any concerns around Pension Fund's governance arrangements or disclosures within the draft Governance Statement.

Wider scope dimension	Wider scope risk identified in our audit plan	Wider scope audit response and findings	Grant Thornton conclusion
Financial Sustainability, (as applicable to a smaller body)	No significant risks identified within our audit planning.	For the year to 31 March 2022, the Pension Fund reported a return on investments (ROI) of 3.86%, underperforming the benchmark of 10%. This was primarily due to the impact on performance of global equities as a result of the market uncertainty impacting on investment valuations towards the end of the financial year. While the Pension Fund's performance over the medium to longer term has exceeded benchmark, with a five year return of 7.45% against a benchmark of 7.26%, Officers recognise that with rising interest rates and global uncertainty it is likely these could adversely impact investment performance over the short term. The Pension Fund has a range of investments as it seeks to diversify its portfolio of investments, minimising the impact on the fund. The Pension Fund maintains a strong financial position. The most recent triennial valuation (valuing scheme liabilities) took place as at 31 March 2020. This showed that the Pension Fund was 100% funded. While the Pension Fund reported a strong financial position, ongoing market uncertainty and a weaker outlook for future investment returns means there is increasing upwards pressure on primary contribution rates of the fund. The Pension Fund gives its members a guarantee that in exchange for contributions during their employment, the pension fund will pay a pension until the end of each member's life. There is a timing difference of many years between the receipt of contributions and the payments of pensions. The Pension Fund needs to maintain capacity to meet current and future needs of its members, despite changes over time in investment performance and demographics (life expectancy). The Pension Fund is a multi-employer fund with 9 scheduled bodies and 17 admitted bodies. Given the public sector nature of these employers the funding risk associated with default is viewed as relatively low by the Pension Fund and the fund plans to recoup deficits over a twenty year period for most employers.	Through our audit procedures we have not identified any significant risks in relation to Pension Fund's financial sustainability. The Pension Fund's performance during 2022 underperformed against benchmark, reporting a 3.86% return on investments. This represented a significant reduction from the prior year return of 27%, demonstrating the impact of the global uncertainty and interest rates on fund performance. Officers recognise that there continues to be risks around the Pension Fund with weakening forecasts investment returns as well as wider economic risks impacting participating bodies. Managing these risks continues to be a focus of the Pension Fund in shaping investment strategy.

Appendices

1. Audit Adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

We are pleased to report that there were no corrected or uncorrected misstatements to the primary financial statements.

Misclassification and disclosure changes

The table below provides details of substantive misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

Disclosure	Auditor recommendations	Adjusted?
Annual Report (Management Commentary)	There is an opportunity to enhance the Management Commentary to provide a greater overall focus on fund performance as well as operational performance. Currently the focus is predominately operation and relating to the administration of the fund. In addition, the commentary should refer to the specific legislation and applicable guidance the report has been prepared under.	Partly – Minor presentational changes have been made to the draft Annual report. This has included reference to the applicable legislation and guidance which the Annual Report and Accounts are prepared in accordance with. Officers have proposed to undertake a detailed review of the Annual Report against good practice to enhance disclosures for 2022/23. As auditors we are satisfied the Annual Report is free from material omissions and is consistent with the financial statements.
Risk disclosures	The current disclosures for sensitivity include 13% in relation to currency risk. This has been applied uniformly across all currencies. It is unclear how the Fund has determined the rate and a uniform currency risk would be unusual as it would not appear to reflect the risk exposure / sensitivity associated with different currencies.	No – Highland Council Pension Fund has adopted a single risk analysis that incorporates volatility from market, interest rate, foreign exchange, credit, and all other sources of risk, and, importantly, makes allowance for how these risks may offset each other. As auditors we do not consider this represents a full disclosure of the sensitivity of the currency risk to which the fund is exposed. While we are satisfied this does not reflect a material misstatement to the user of the accounts, Officers have agreed that they will review this disclosure for next year as part of the review against best practice.

There were minor presentational (rounding / formatting) changes recommended to Management. These are not considered material to the accounts.

2. Audit fees and independence

External Audit Fee

Service	Fees £
External Auditor Remuneration	29,210
Pooled Costs	2,890
Contribution to Audit Scotland costs	1,480
Contribution to Performance Audit and Best Value	-
2021/22 Fee	33,580

Fees for other services

Service	Fees £
We confirm that for 2021/22 we did not receive any fees for non-audit services	Nil

Client service

We take our client service seriously and continuously seek your feedback on our external audit service. Should you feel our service falls short of expected standards please contact Joanne Brown, Head of Public Sector Assurance Scotland in the first instance who oversees our portfolio of Audit Scotland work (joanne.e.brown@uk.gt.com). Alternatively, should you wish to raise your concerns further please contact Jon Roberts, Partner and Head of Assurance, 30 Finsbury Square, London, EC2A 1AG. If your feedback relates to audit quality and we have not successfully resolved your concerns, your concerns should be reported to Elaine Boyd, Assistant Director, Audit Scotland Quality and Appointments in accordance with the Audit Scotland audit quality complaints process.

Transparency

Grant Thornton publishes an annual Transparency Report, which sets out details of the action we have taken over the past year to improve audit quality as well as the results of internal and external quality inspections. For more details see Transparency report 2021 (grantthornton.co.uk)

Independence and ethics

- We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention.
- We have complied with the Financial Reporting Council's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.
- We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.
- We are required by auditing and ethical standards to communicate any relationships that may affect the independence and objectivity of the audit team.
- We can confirm no independence concerns have been identified.

1. Communication of audit matters

International Standards on Auditing (UK) (ISA) 260, as well as other ISAs, prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table below.

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, including planning assessment of audit risks and wider scope risks	•	
Confirmation of independence and objectivity	•	•
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	•	•
Significant matters in relation to going concern	•	•
Views about the qualitative aspects of the Pension Fund’s accounting and financial reporting practices, including accounting policies, accounting estimates and financial statement disclosures		•
Significant findings from the audit		•
Significant matters and issues arising during the audit and written representations that have been sought		•
Significant difficulties encountered during the audit		•
Significant deficiencies in internal control identified during the audit		•
Significant matters arising in connection with related parties		•
Identification or suspicion of fraud involving management and/or which results in material misstatement of the financial statements		•
Non-compliance with laws and regulations		•
Unadjusted misstatements and material disclosure omissions		•
Expected modifications to the auditor's report, or emphasis of matter		•

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