

Item: 5

Pension Fund Sub-committee: 24 November 2021.

Orkney Islands Council Pension Fund.

Audit Report to those charged with Governance.

Report by Interim Executive Director of Finance, Regulatory, Marine and Transportation Services.

1. Purpose of Report

To consider the External Auditor's Annual Audit Report to Members and the Controller of Audit to those charged with governance of the Orkney Islands Council Pension Fund.

2. Recommendations

The Sub-committee is invited to note:

2.1.

That Audit Scotland, as the Council's external auditors, have concluded their audit of the Orkney Islands Council Pension Fund's Annual Report and Accounts for the year ended 31 March 2021.

2.2.

That Audit Scotland has provided an unmodified certificate on the Pension Fund's Annual Report and Accounts for the year ended 31 March 2021.

2.3.

That the draft audit certificate states that the accounts have been properly prepared in accordance with applicable law, accounting standards and other reporting requirements.

2.4.

That, during the course of the audit, a number of presentational, consistency and disclosure errors were identified within the financial statements, which have been adjusted in the final accounts.

2.5.

That no material weaknesses in the accounting and internal control systems relating to the Pension Fund were identified during the audit.

2.6.

Audit Scotland's covering letter in respect of the Orkney Islands Council Pension Fund Annual Audit Report, attached as Appendix 1 to this report.

2.7.

Orkney Island's Council's Letter of Representation to Audit Scotland in connection with their audit of the financial statements of Orkney Islands Council Pension Fund for the year ended 31 March 2021, attached as Appendix 2 to this report.

2.8.

The Annual Audit Report to Members of the Pension Fund Sub-committee and the Controller of Audit, in respect of the Orkney Islands Council Pension Fund, attached as Appendix 3 to this report.

3. External Audit

The main elements of the audit work carried out by Audit Scotland for financial year 2020/21 are as follows:

- Audit of the annual report and accounts and provision of an opinion on whether:
 - They give a true and fair view in accordance with applicable law and the 2020/21 Code of the financial transactions of the fund during the year ended 31 March 2021 and of the amount and disposition at that date of its assets and liabilities.
 - They have been properly prepared in accordance with International Financial Reporting Standards as adopted by the European Union, as interpreted and adapted by the 2020/21 Code.
 - The accounts 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.
- A review and assessment of the Pension Fund governance and performance arrangements in a number of key areas including a review of:
 - Standing orders.
 - Codes of Conduct for officers and members.
 - Whistleblowing Policy.
 - Anti-fraud and corruption arrangements.
 - Financial Regulations.
 - Systems of internal control.
 - Internal Audit.
 - Arrangements for ensuring the proper conduct of affairs of the Pension Fund in accordance with the law and the requirements of the Pension Regulator.

- Commitment to transparency.
- Provision of an independent auditor's report to the Orkney Islands Council Pension Fund and the Accounts Commission for Scotland that the audit of the financial statements has been completed in accordance with applicable statutory requirements, including an opinion on those financial statements.

4. External Audit Findings

4.1.

The auditors have reported that their independent auditor's report, dated 24 November 2021, contains an unmodified audit opinion on the Statement of Accounts for the Pension Fund for the year ended 31 March 2021. The independent auditor's report, attached as Appendix 1 to this report, certifies that the accounts have been properly prepared in accordance with applicable law, accounting standards and other reporting requirements.

4.2.

As part of the completion of the audit, Audit Scotland seeks written assurances from the Section 95 Officer on aspects of the financial statements and judgements and estimates made. The Orkney Islands Council letter of representation is attached as Appendix 2 to this report.

4.3.

The auditors identified a number of presentational adjustments in the draft financial statements during the course of the audit.

4.4.

No material weaknesses in the accounting and internal control systems were identified during the audit.

4.5.

No material adjustments were required.

4.6.

The Annual Audit Report to Members and the Controller of Audit of the Orkney Islands Council Pension Fund, is attached as Appendix 3 to this report.

5. Corporate Governance

This report relates to the Council complying with its governance and financial processes and procedures and therefore does not directly support and contribute to improved outcomes for communities as outlined in the Council Plan and the Local Outcomes Improvement Plan.

6. Financial Implications

The audit fee for the audit of the Pension Fund's annual report and accounts was £21,490 which is £480 more than the fee for the 2019/20 audit.

7. Legal Aspects

7.1.

The Local Government Pension Scheme is a funded defined benefit scheme, established under the Superannuation Act 1972, with pensioners receiving index-linked pensions. It is administered by Orkney Islands Council in accordance with The Local Government Pension Scheme (Scotland) Regulations 2018 (as amended) and is contracted out of the State Second Pension. The Pension Fund is subject to a triennial valuation by an independent, qualified Actuary, whose report indicates the required future employer's contributions.

7.2.

Local authorities have a duty under section 12 of the Local Government in Scotland Act 2003 to observe proper accounting practices.

7.3.

The Local Government Pension Scheme Amendment (Scotland) Regulation 2010 (SSI 2010/234) require a pensions fund annual report and separate audit.

8. Contact Officers

Gareth Waterson, Interim Executive Director of Finance, Regulatory, Marine and Transportation Services, extension 2103, Email gareth.waterson@orkney.gov.uk.

Colin Kemp, Interim Head of Finance, extension 2106, Email colin.kemp@orkney.gov.uk.

Shonagh Merriman, Interim Corporate Finance Senior Manager, extension 2105, Email shonagh.merriman@orkney.gov.uk.

9. Appendices

Appendix 1: Audit Scotland ISA 260 covering letter for the Orkney Islands Council Pension Fund Annual Audit Report.

Appendix 2: Orkney Islands Council's Letter of Representation to Audit Scotland in connection with their audit of the financial statements of Orkney Islands Council Pension Fund for the year ended 31 March 2021.

Appendix 3: Audit Scotland Annual Report to Members and the Controller of Audit of the Orkney Islands Council Pension Fund Annual Report and Accounts (ISA 260 Report).

Pension Fund Sub Committee and Pension Board

8 November 2021

Orkney Islands Council Pension Fund Audit of 2020/21 annual report and accounts

Independent auditor's report

1. Our audit work on the 2020/21 annual report and accounts is now substantially complete. Subject to the satisfactory conclusion of the outstanding matters referred to later in this letter and receipt of a revised set of annual report and accounts for final review, we anticipate being able to issue unmodified audit opinions in the independent auditor's report on 24 November 2021 (the proposed report is attached at Appendix A).

Annual audit report

2. Under International Standards on Auditing in the UK we report specific matters arising from the audit of the financial statements to those charged with governance of a body in sufficient time to enable appropriate action. We present for the Pension Fund Sub Committee and Pension Board's consideration our draft annual report on the 2020/21 audit. The section headed "Significant findings from the audit in accordance with ISA 260" sets out the issues identified in respect of the annual report and accounts.

3. The report also sets out conclusions from our consideration of the four audit dimensions that frame the wider scope of public audit as set out in the Code of Audit Practice.

4. This report will be issued in final form after the annual report and accounts have been certified.

Unadjusted misstatements

5. We also report to those charged with governance all unadjusted misstatements identified during our audit, other than those of a trivial nature, and request that these misstatements be corrected. We have no unadjusted misstatements to be corrected.

Fraud, subsequent events and compliance with laws and regulations

6. In presenting this report to the Pensions Fund Sub Committee and Pension Board we seek confirmation from those charged with governance of any instances of any actual, suspected or alleged fraud; any subsequent events that have occurred since the date of the financial statements; or material non-compliance with laws and regulations affecting the entity that should be brought to our attention.

Representations from Section 95 Officer

7. As part of the completion of our audit, we are seeking written representations from the Section 95 Officer on aspects of the annual report and accounts including the judgements and estimates made.

8. A draft letter of representation is attached at [Appendix B](#). This should be signed and returned to us by the Section 95 Officer with the signed annual report and accounts prior to the independent auditor's report being certified.

APPENDIX A: Proposed Independent Auditor's Report

Independent auditor's report to the members of Orkney Islands Council as administering authority for Orkney Islands Council Pension Fund and the Accounts Commission

Report on the audit of the financial statements

Opinion on financial statements

I certify that I have audited the financial statements in the annual report Orkney Islands Council Pension Fund (the fund) for the year ended 31 March 2021 under Part VII of the Local Government (Scotland) Act 1973. The financial statements comprise the Pension Fund Account, the Net Assets Statement and notes to the annual accounts, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and International Financial Reporting Standards (IFRSs) as adopted by the European Union, and as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (the 2020/21 Code).

In my opinion the accompanying financial statements:

- give a true and fair view in accordance with applicable law and the 2020/21 Code of the financial transactions of the fund during the year ended 31 March 2021 and of the amount and disposition at that date of its assets and liabilities;
- have been properly prepared in accordance with IFRSs as adopted by the European Union, as interpreted and adapted by the 2020/21 Code; and
- 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.

Basis for opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)) as required by the [Code of Audit Practice](#) approved by the Accounts Commission for Scotland. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I was appointed under arrangements approved by the Accounts Commission on 10 April 2017. The period of total uninterrupted appointment is five years. I am independent of the fund in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled my other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the council. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern basis of accounting

I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the fund's

ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

Risks of material misstatement

I report in a separate Annual Audit Report, available from the [Audit Scotland website](#), the most significant assessed risks of material misstatement that I identified and my judgements thereon.

Responsibilities of the Interim Executive Director of Finance, Regulatory, Marine and Transport Services and Orkney Islands Council Pension Fund Sub Committee for the financial statements

As explained more fully in the Statement of Responsibilities, the Interim Executive Director of Finance, Regulatory, Marine and Transportation Services is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Interim Executive Director of Finance, Regulatory, Marine and Transportation Services determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Interim Executive Director of Finance, Regulatory, Marine and Transportation Services is responsible for assessing the fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless deemed inappropriate.

The Orkney Islands Council Pension Fund Sub Committee is responsible for overseeing the financial reporting process.

Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities outlined above to detect material misstatements in respect of irregularities, including fraud. Procedures include:

- obtaining an understanding of the applicable legal and regulatory framework and how the fund is complying with that framework;
- identifying which laws and regulations are significant in the context of the fund;
- assessing the susceptibility of the financial statements to material misstatement, including how fraud might occur; and
- considering whether the audit team collectively has the appropriate competence and capabilities to identify or recognise non-compliance with laws and regulations.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the fund's controls, and the nature, timing and extent of the audit procedures performed.

Irregularities that result from fraud are inherently more difficult to detect than irregularities that result from error as fraud may involve collusion, intentional omissions, misrepresentations, or

the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website www.frc.org.uk/auditorsresponsibilities. This description forms part of my auditor's report.

Reporting on other requirements

Statutory other information

The Interim Executive Director of Finance, Regulatory, Marine and Transportation Services is responsible for the statutory other information in the annual report. The statutory other information comprises the information other than the financial statements and my auditor's report thereon.

My responsibility is to read all the statutory other information and, in doing so, consider whether the statutory other information is materially inconsistent with the financial statements or my knowledge obtained in the audit or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this statutory other information, I am required to report that fact. I have nothing to report in this regard.

My opinion on the financial statements does not cover the statutory other information and I do not express any form of assurance conclusion thereon except to the extent explicitly stated in the following opinions prescribed by the Accounts Commission.

Opinions prescribed by the Accounts Commission

In my opinion, based on the work undertaken in the course of the audit:

- the information given in the Management Commentary for the financial year for which the financial statements are prepared 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 for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Delivering Good Governance in Local Government: Framework (2016); and
- the information given in the Governance Compliance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with The Local Government Pension Scheme (Scotland) Regulations 2018.

Matters on which I am required to report by exception

I am required by the Accounts Commission to report to you if, in my opinion:

- adequate accounting records have not been kept; or
- the financial statements are not in agreement with the accounting records; or

- I have not received all the information and explanations I require for my audit.

I have nothing to report in respect of these matters.

Conclusions on wider scope responsibilities

In addition to my responsibilities for the annual report, my conclusions on the wider scope responsibilities specified in the Code of Audit Practice, including those in respect of Best Value, are set out in my Annual Audit Report.

Use of my report

This report is made solely to the parties to whom it is addressed in accordance with Part VII of the Local Government (Scotland) Act 1973 and for no other purpose. In accordance with paragraph 120 of the Code of Audit Practice, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Gillian Woolman MA FCA CPFA

Audit Director

Audit Scotland

4th Floor

102 West Port

Edinburgh

EH3 9DN

Leave space for date to be inserted electronically

APPENDIX B Letter of Representation (ISA 580)

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

Dear Gillian

Orkney Islands Council Pension Fund Annual report and accounts 2020/21

1. This representation letter is provided in connection with your audit of the annual report and accounts of Orkney Islands Council Pension Fund for the year ended 31 March 2021 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with the financial reporting framework, and for expressing other opinions on the management commentary, annual governance statement and governance compliance statement.

2. I confirm to the best of my knowledge and belief, and having made such enquiries as I considered necessary, the following representations given to you in connection with your audit of Orkney Islands Council Pension Fund annual report and accounts for the year ended 31 March 2021.

General

3. I have fulfilled my responsibilities for the preparation of the 2020/21 annual report and accounts. All the accounting records, documentation and other matters which I am aware are relevant to the preparation of the annual report and accounts have been made available to you for the purposes of your audit. All transactions undertaken by Orkney Islands Council Pension Fund have been recorded in the accounting records and are properly reflected in the financial statements.

4. I confirm that the effects of uncorrected misstatements are immaterial, individually and in aggregate, to the financial statements as a whole. I am not aware of any uncorrected misstatements other than those reported by you.

Financial Reporting Framework

5. The annual report and accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (2020/21 accounting code), and in accordance with the requirements of the Local Government (Scotland) Act 1973, the Local Government in Scotland Act 2003 and the Local Authority Accounts (Scotland) Regulations 2014.

6. In accordance with the 2014 regulations, I have ensured that the financial statements give a true and fair view of the financial position of the Orkney Islands Council Pension Fund at 31 March 2021 and the transactions for 2020/21.

Accounting Policies & Estimates

7. All significant accounting policies applied are as shown in the note included in the financial statements. The accounting policies are determined by the 2020/21 accounting code, where applicable. Where the code does not specifically apply, I have used judgement in developing and applying an accounting policy that results in information that is relevant and reliable. All accounting policies applied are appropriate to Orkney Islands Council Pension Fund circumstances and have been consistently applied.

9. The significant assumptions used in making accounting estimates are reasonable and properly reflected in the financial statements. Judgements used in making estimates have been based on the latest available, reliable information. Estimates have been revised where there are changes in the circumstances on which the original estimate was based or because of new information or experience.

Going Concern Basis of Accounting

10. I have assessed Orkney Islands Council Pension Fund ability to continue to use the going concern basis of accounting and have concluded that it is appropriate. I am not aware of any material uncertainties that may cast significant doubt on Orkney Islands Council Pension Fund ability to continue as a going concern.

Assets

Investments

10. For the year ended 31 March 2021, the amounts included in the net assets statements reflect investments managed/held both internally and externally by appointed fund managers and the global custodian on behalf of the funds. Amounts have been calculated in accordance with approved bases of valuation and fairly represent the values at 31 March 2021. In making these assertions I am reliant on the opinions of the appointed fund managers. As far as we can reasonably ascertain, all assets are free from any lien, encumbrance or charge except as disclosed in the financial statements.

Banking and Cash Flow Arrangements

13. The pension funds maintain separate bank accounts and while these accounts form part of Orkney Islands Councils treasury management arrangements, the pension fund can demonstrate that there is no borrowing from the administering authority. Amounts due to the administering authority to cover daily cash flows such as payments through the council's systems are reimbursed on a regular basis.

Other Current Assets

14. On realisation in the ordinary course of the funds' business, the other current assets in the Net Assets Statements are expected, in my opinion, to produce at least the amounts at which they are stated. In particular adequate provision has, in my opinion, been made against all amounts owing which are known or may be expected to be irrecoverable.

Liabilities

15. All liabilities at 31 March 2021 of which I am aware have been recognised in the financial statements.

16. Provisions have been recognised in the financial statements for all liabilities of uncertain timing or amount at 31 March 2021 of which I am aware where the conditions specified in the 2020/21 accounting code have been met. The amount recognised as a provision is the best estimate of the expenditure likely to be required to settle the obligation at 31 March 2021. Where the effect of the time value of money is material, the amount of the provision has been discounted to the present value of the expected payments.

17. Provisions recognised in previous years have been reviewed and adjusted, where appropriate, to reflect the best estimate at 31 March 2021 or to reflect material changes in the assumptions underlying the calculations of the cash flows.

18. The pension assumptions made by the actuary in the IAS 19 report for Orkney Islands Council Pension Fund have been considered and I confirm that they are consistent with management's own view.

29. There are no plans or intentions that are likely to affect the carrying value or classification of the liabilities recognised in the financial statements.

Contingent liabilities

20. There are no significant contingent liabilities, other than those disclosed in Note 31, arising either under formal agreement or through formal undertakings requiring disclosure in the accounts. All known contingent liabilities have been fully and properly disclosed, including any outstanding legal claims which have not been provided under the accounting code 2020/21 and IAS 37.

Fraud

21. I have provided you with all information in relation to

- my assessment of the risk that the financial statements may be materially misstated as a result of fraud
- any allegations of fraud or suspected fraud affecting the financial statements
- fraud or suspected fraud that I am aware of involving management, employees who have a significant role in internal control, or others that could have a material effect on the financial statements.

Laws and Regulations

22. I have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.

Related Party Transactions

23. All material transactions with related parties have been appropriately accounted for and disclosed in the financial statements in accordance with IAS 24 as interpreted by the accounting code 2020/21. I have made available to you the identity of all the Orkney Islands Council Pension Fund related parties and all the related party relationships and transactions of which I am aware.

Management commentary

24. I confirm that the Management Commentary has been prepared in accordance with the statutory guidance and the information is consistent with the financial statements.

Corporate Governance

25. I confirm that the Orkney Islands Council Pension Fund has undertaken a review of the system of internal control during 2020/21 to establish the extent to which it complies with proper practices set out in the Delivering Good Governance in Local Government: Framework 2016. I have disclosed to you all deficiencies in internal control identified from this review or of which I am otherwise aware.

26. I confirm that the Annual Governance Statement has been prepared in accordance with the Delivering Good Governance in Local Government: Framework 2016 and the information is consistent with the financial statements. In response to the Covid-19 pandemic, there have been several changes in governance arrangements including virtual committee meetings and homeworking for a range of staff. I am satisfied that our arrangements have been adequately maintained during the pandemic and that appropriate details have been disclosed in the Governance Statement. Otherwise, there have been no significant changes in governance arrangements or issues identified, since 31 March 2021, which require to be reflected.

27. I confirm that the Governance Statement has been prepared in accordance with the Scottish Public Finance Manual and the information is consistent with the financial statements. There have been no changes in the corporate governance arrangements or issues identified since 31 March 2021 which require to be reflected.

Events Subsequent to the Date of the Statement of Financial Position

28. All events subsequent to 31 March 2021 for which IAS 10 as interpreted by the FReM requires adjustment or disclosure have been adjusted or disclosed.

Yours sincerely

Gareth Waterson

Interim Executive Director of Finance, Regulatory, Marine and Transportation Services

FINANCE, REGULATORY, MARINE & TRANSPORTATION SERVICES**FINANCE SERVICE**

Interim Executive Director: Gareth O Waterson BAcc CA

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

Dear Gillian

Orkney Islands Council Pension Fund Annual report and accounts 2020/21

1. This representation letter is provided in connection with your audit of the annual report and accounts of Orkney Islands Council Pension Fund for the year ended 31 March 2021 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with the financial reporting framework, and for expressing other opinions on the management commentary, annual governance statement and governance compliance statement.
2. I confirm to the best of my knowledge and belief, and having made such enquiries as I considered necessary, the following representations given to you in connection with your audit of Orkney Islands Council Pension Fund annual report and accounts for the year ended 31 March 2021.

General

3. I have fulfilled my responsibilities for the preparation of the 2020/21 annual report and accounts. All the accounting records, documentation and other matters which I am aware are relevant to the preparation of the annual report and accounts have been made available to you for the purposes of your audit. All transactions undertaken by Orkney Islands Council Pension Fund have been recorded in the accounting records and are properly reflected in the financial statements.
4. I confirm that the effects of uncorrected misstatements are immaterial, individually and in aggregate, to the financial statements as a whole. I am not aware of any uncorrected misstatements other than those reported by you.

Financial Reporting Framework

5. The annual report and accounts have been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (2020/21 accounting code), and in accordance with the requirements of the Local Government (Scotland) Act 1973, the Local Government in Scotland Act 2003 and the Local Authority Accounts (Scotland) Regulations 2014.

6. In accordance with the 2014 regulations, I have ensured that the financial statements give a true and fair view of the financial position of the Orkney Islands Council Pension Fund at 31 March 2021 and the transactions for 2020/21.

Accounting Policies & Estimates

7. All significant accounting policies applied are as shown in the note included in the financial statements. The accounting policies are determined by the 2020/21 accounting code, where applicable. Where the code does not specifically apply, I have used judgement in developing and applying an accounting policy that results in information that is relevant and reliable. All accounting policies applied are appropriate to Orkney Islands Council Pension Fund circumstances and have been consistently applied.
8. The significant assumptions used in making accounting estimates are reasonable and properly reflected in the financial statements. Judgements used in making estimates have been based on the latest available, reliable information. Estimates have been revised where there are changes in the circumstances on which the original estimate was based or because of new information or experience.

Going Concern Basis of Accounting

9. I have assessed Orkney Islands Council Pension Fund ability to continue to use the going concern basis of accounting and have concluded that it is appropriate. I am not aware of any material uncertainties that may cast significant doubt on Orkney Islands Council Pension Fund ability to continue as a going concern.

Assets

Investments

10. For the year ended 31 March 2021, the amounts included in the net assets statements reflect investments managed/held both internally and externally by appointed fund managers and the global custodian on behalf of the funds. Amounts have been calculated in accordance with approved bases of valuation and fairly represent the values at 31 March 2021. In making these assertions I am reliant on the opinions of the appointed fund managers. As far as we can reasonably ascertain, all assets are free from any lien, encumbrance or charge except as disclosed in the financial statements.

Banking and Cash Flow Arrangements

11. The pension funds maintain separate bank accounts and while these accounts form part of Orkney Islands Councils treasury management arrangements, the pension fund can demonstrate that there is no borrowing from the administering authority. Amounts due to the administering authority to cover daily cash flows such as payments through the council's systems are reimbursed on a regular basis.

Other Current Assets

12. On realisation in the ordinary course of the funds' business, the other current assets in the Net Assets Statements are expected, in my opinion, to produce at least the amounts at which they are stated. In particular adequate provision has, in my opinion, been made against all amounts owing which are known or may be expected to be irrecoverable.

Liabilities

13. All liabilities at 31 March 2021 of which I am aware have been recognised in the financial statements.
14. Provisions have been recognised in the financial statements for all liabilities of uncertain timing or amount at 31 March 2021 of which I am aware where the conditions specified in the 2020/21 accounting code have been met. The amount recognised as a provision is the best estimate of the expenditure likely to be required to settle the obligation at 31 March 2021. Where the effect of the time value of money is material, the amount of the provision has been discounted to the present value of the expected payments.
15. Provisions recognised in previous years have been reviewed and adjusted, where appropriate, to reflect the best estimate at 31 March 2021 or to reflect material changes in the assumptions underlying the calculations of the cash flows.
16. The pension assumptions made by the actuary in the IAS 19 report for Orkney Islands Council Pension Fund have been considered and I confirm that they are consistent with management's own view.
17. There are no plans or intentions that are likely to affect the carrying value or classification of the liabilities recognised in the financial statements.

Contingent liabilities

18. There are no significant contingent liabilities, other than those disclosed in Note 31, arising either under formal agreement or through formal undertakings requiring disclosure in the accounts. All known contingent liabilities have been fully and properly disclosed, including any outstanding legal claims which have not been provided under the accounting code 2020/21 and IAS 37.

Fraud

19. I have provided you with all information in relation to
 - my assessment of the risk that the financial statements may be materially misstated because of fraud
 - any allegations of fraud or suspected fraud affecting the financial statements
 - fraud or suspected fraud that I am aware of involving management, employees who have a significant role in internal control, or others that could have a material effect on the financial statements.

Laws and Regulations

20. I have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.

.Related Party Transactions

21. All material transactions with related parties have been appropriately accounted for and disclosed in the financial statements in accordance with IAS 24 as interpreted by the accounting

code 2020/21. I have made available to you the identity of all the Orkney Islands Council Pension Fund related parties and all the related party relationships and transactions of which I am aware.

Management commentary

22. I confirm that the Management Commentary has been prepared in accordance with the statutory guidance and the information is consistent with the financial statements.


Corporate Governance

23. I confirm that the Orkney Islands Council Pension Fund has undertaken a review of the system of internal control during 2020/21 to establish the extent to which it complies with proper practices set out in the Delivering Good Governance in Local Government: Framework 2016. I have disclosed to you all deficiencies in internal control identified from this review or of which I am otherwise aware.
24. I confirm that the Annual Governance Statement has been prepared in accordance with the Delivering Good Governance in Local Government: Framework 2016 and the information is consistent with the financial statements. In response to the Covid-19 pandemic, there have been several changes in governance arrangements including virtual committee meetings and homeworking for a range of staff. I am satisfied that our arrangements have been adequately maintained during the pandemic and that appropriate details have been disclosed in the Governance Statement. Otherwise, there have been no significant changes in governance arrangements or issues identified, since 31 March 2021, which require to be reflected.
25. I confirm that the Governance Statement has been prepared in accordance with the Scottish Public Finance Manual and the information is consistent with the financial statements. There have been no changes in the corporate governance arrangements or issues identified since 31 March 2021 which require to be reflected.

Events Subsequent to the Date of the Statement of Financial Position

26. All events subsequent to 31 March 2021 for which IAS 10 as interpreted by the FReM requires adjustment or disclosure have been adjusted or disclosed.

Yours sincerely



Gareth Waterson
Interim Executive Director of Finance, Regulatory, Marine and Transportation Services

Orkney Islands Council Pension Fund

2020/21 Annual Audit Report



 AUDIT SCOTLAND

To Members of the Orkney Islands Council Pension Fund Sub-Committee and the
Controller of Audit

November 2021

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Key messages

2020/21 annual accounts

- 1 Our audit opinions on the annual accounts of the Fund are unmodified.
- 2 Covid-19 led to delays in the auditing timetable for the 2020/21 annual accounts. Submission of the audited annual accounts is in line with revised government timescales.

Financial management

- 3 The Fund has appropriate and effective financial management arrangements.
- 4 The Fund has had a strong investment performance in 2020/21 and the value of investments has recovered from the prior year which was impacted by the Covid-19 pandemic.

Financial sustainability

- 5 The triennial valuation as at March 2020 assessed the Fund as having sufficient assets to cover its liabilities, consequently contribution rates remained the same.
- 6 The Fund reviewed its investment strategy following the triennial valuation and will continue to diversify the investment structure to support income generation.

Governance and transparency

- 7 The governance arrangements introduced in response to the pandemic are appropriate and operated effectively.
- 8 There is effective scrutiny, challenge and informed decision making.

Best Value

- 9 The pension administration function has performed well against targets despite added pressures from the Covid-19 pandemic.
- 10 Fund investment performance in 2020/21 has exceeded all agreed benchmarks as markets recover from the significantly reduced annual returns last year.
- 11 The Fund has effective arrangements in place for monitoring investment performance and scrutinising investment management expenses.

Introduction

1. This report is a summary of our findings arising from the 2020/21 audit of Orkney Islands Council Pension Fund (the Fund).
2. The scope of our audit was set out in our Annual Audit Plan presented to the May 2021 meeting of the Pension Fund Sub-Committee. This report comprises:
 - an audit of the Fund's annual accounts
 - consideration of the wider dimensions of financial management, financial sustainability, governance and transparency, and value for money, that frame the wider scope of public audit set out in the [Code of Audit Practice 2016](#)
3. The main elements of our audit work in 2020/21 have been:
 - an audit of the Fund's 2020/21 annual accounts including the issue of an independent auditor's report setting out our opinions
 - a review of the Fund's main financial systems
 - consideration of the four audit dimensions of financial management, financial sustainability, governance and transparency and value for money.

Added Value

4. We add value to the Fund through the audit by:
 - identifying and providing insight on significant risks, and making clear and relevant recommendations
 - sharing intelligence and good practice through our national reports ([Appendix 3](#)) and good practice guides
 - providing clear and focused conclusions on the appropriateness, effectiveness and impact of corporate governance, performance management arrangements and financial sustainability.

Responsibilities and reporting

5. Orkney Islands Council is the administering authority for the Orkney Islands Council Pension Fund. The council delegates this responsibility to the Pension Fund Sub-Committee. The Sub-Committee is responsible for establishing effective governance arrangements and ensuring that financial management is

effective. The Sub-Committee is required to review the effectiveness of internal control arrangements and approve the annual accounts.

6. Our responsibilities as independent auditors are established by the Local Government (Scotland) Act 1973, the [Code of Audit Practice 2016](#), and supplementary guidance, and International Standards on Auditing in the UK.

7. As public sector auditors we give independent opinions on the annual accounts. Additionally, we also conclude on:

- the effectiveness of the Fund's performance management arrangements
- suitability and effectiveness of corporate governance arrangements and financial position
- arrangements for securing financial sustainability.

8. Further details of the respective responsibilities of management and the auditor can be found in the [Code of Audit Practice 2016](#) and supplementary guidance.

9. This report raises matters from the audit of the annual accounts and consideration of the audit dimensions. Weaknesses or risks identified are only those which have come to our attention during our normal audit work and may not be all that exist. Communicating these does not absolve management from its responsibility to address the issues we raise and to maintain adequate systems of control.

10. Our annual audit report contains an agreed action plan at [Appendix 1](#) setting out specific recommendations, responsible officers and dates for implementation. It also includes any outstanding actions from last year and progress against these.

Auditor Independence

11. Auditors appointed by the Accounts Commission or Auditor General must comply with the Code of Audit Practice and relevant supporting guidance. When auditing the financial statements auditors must comply with professional standards issued by the Financial Reporting Council and those of the professional accountancy bodies.

12. We can confirm that we comply with the Financial Reporting Council's Ethical Standard. We can also confirm that we have not undertaken any non-audit related services and therefore the 2020/21 audit fee of £21,490 as set out in our Annual Audit Plan remains unchanged.

13. This report is addressed to both the members of the Pension Fund Sub-Committee and the Controller of Audit and will be published on Audit Scotland's website www.audit-scotland.gov.uk in due course.

14. We would like to thank the management and staff who have been involved in our work for their cooperation and assistance during the audit.

1. Audit of 2020/21 annual accounts

The principal means of accounting for the stewardship of resources and performance

Main judgements

Our audit opinions on the annual accounts of the Fund are unmodified.

Covid-19 led to delays in the auditing timetable for the 2020/21 annual accounts. Submission of the audited annual accounts is in line with revised government timescales.

Our audit opinions on the annual accounts are unmodified

15. The annual accounts for the year ended 31 March 2021 were approved by the Pension Fund Sub-Committee on 24 November 2021. We reported, within the independent auditor's report that:

- the financial statements give a true and fair view and were properly prepared in accordance with the financial reporting framework
- the management commentary, annual governance statement and governance compliance statement were all consistent with the financial statements and properly prepared in accordance with the guidance.

The annual accounts were signed off in line with the timescales permitted to reflect Covid-19

16. As a result of the continuing impact of Covid-19 the submission deadlines for the Pension Fund audited annual accounts and annual audit reports have been set at 30 November 2021.

17. The unaudited annual accounts were received on 29 June 2021 in line with our agreed audit timetable. The working papers provided with the unaudited accounts were of a good standard and finance staff provided good support to the audit team during the audit. This helped ensure that the audit of the annual accounts process ran smoothly.

18. The completeness and accuracy of accounting records and the extent of information and explanations that we required were not affected by the Covid-19 pandemic.

19. Despite the pressures on the 2020/21 audit process the annual accounts were signed off in line with our planned timetable and the requirements of the Scottish Government.

There were no objections raised to the annual accounts

20. The Local Authority Accounts (Scotland) Regulations 2014 require local government bodies to publish a public notice on their website that includes details of the period for inspecting and objecting to the accounts. This must remain on the website throughout the inspection period. The notice for the Fund was published on the website of the administering authority (Orkney Islands Council) and complies with the regulations. No objections were received in relation to the Fund accounts.

Overall materiality is £5.2 million

21. We apply the concept of materiality in both planning and performing the audit and in evaluating the effect of identified misstatements on the audit and of uncorrected misstatements, if any, on the financial statements and in forming the opinion in the auditor's report. We identify a benchmark on which to base overall materiality, such as gross expenditure, and apply what we judge to be the most appropriate percentage level for calculating materiality values.

22. The determination of materiality is based on professional judgement and is informed by our understanding of the entity and what users are likely to be most concerned about in the financial statements. In assessing performance materiality, we have considered factors such as our findings from previous audits, any changes in business processes and the entity's control environment including fraud risks.

23. Our initial assessment of materiality for the annual accounts was carried out during the planning phase of the audit. This was reviewed and revised on receipt of the unaudited annual accounts and is summarised in [Exhibit 1](#).

Exhibit 1 Materiality values

Materiality level	Amount
Overall materiality	£5.2 million
Performance materiality	£3.4 million
Reporting threshold	£100 thousand
Specific materiality	£1.1 million
Specific performance materiality	£0.7 million

Source: Audit Scotland

Conclusions on audit work to address risks of material misstatement

24. Our assessment of risks of material misstatement in the annual accounts and any wider audit dimension risks identified in our Annual Audit Plan are included in [Appendix 2](#). These risks influence our overall audit strategy, the allocation of staff resources to the audit, and indicate how the efforts of the audit team are directed. [Appendix 2](#) also identifies the work we undertook to address these risks and our conclusions from this work.

We have no significant findings to report on the annual accounts

25. International Standard on Auditing (UK) 260 requires us to communicate significant findings from the audit to those charged with governance, including our view about the qualitative aspects of the body's accounting practices. We have no issues to report from the audit.

We did not identify any misstatements above our reporting threshold

26. It is our responsibility to request that all misstatements above the reporting threshold are corrected. There were no misstatements above our reporting threshold to report from the 2020/21 audit.

Some progress was made on prior year recommendations

27. The Fund has made some progress in implementing our prior year audit recommendations. For actions not yet implemented, revised responses and timescales have been agreed with management and are set out in [Appendix 1](#).

2. Financial management

Financial management is about financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively.

Main judgements

The Fund has appropriate and effective financial management arrangements.

Systems of internal control operated appropriately and effectively in 2020/21.

The Fund has had a strong investment performance in 2020/21 and the value of investments has recovered from the prior year which was impacted by the Covid-19 pandemic.

Financial systems of internal control operated effectively

28. The Interim Executive Director of Finance, Regulatory, Marine and Transportation Services for Orkney Islands Council is the Proper Officer responsible for the Fund. The Fund uses the financial systems of the administering authority, Orkney Islands Council (the Council). The main council systems used by the Fund are the general ledger system and the payroll system.

29. Our review of the controls in operation within these systems has been conducted as part of our audit of the Council. We have also considered and tested the specific pension fund systems of pensions administration and investments. We have not identified any control weaknesses from these reviews.

The Fund has had a strong investment performance in 2020/21 and recovered from the significant impact of the Covid-19 pandemic on investment values last year

30. When considering the investment performance of the Fund during 2020/21, it is important to recognise the impact of Covid-19 on financial markets and investments. Asset values had reduced significantly at the start of 2020/21 and have increased by £144 million over the year to a position of £521 million at 31 March 2021.

31. The global impact of the pandemic has significantly increased market volatility however as noted asset values have recovered during 2020/21. The Fund's performance in 2020/21 is summarised in [Exhibit 2](#).

Exhibit 2

Assets, funding level and investment performance

Increase in net assets	Funding level	Estimated Past Service Liabilities	Investment performance
£520.8 million	146%	£355 million	13.7%
Closing net assets as at 31 March 2021 (+38.3%)	Net assets vs promised retirement benefits 31 March 2021	Closing liabilities as at 31 March 2021 + £36 million +11%	Average annual return on investments over 5 years
£376.6 million	118%	£319 million	38.3%
Opening net assets at 1 April 2020	Net assets vs promised retirement benefits 31 March 2020	Opening liabilities as at 1 April 2020	Return on investments 2020/21

Source: 2020/21 Orkney Islands Council Pension Fund unaudited annual report and accounts

32. The Fund's actuary undertakes a valuation of the Fund's liabilities to pay future retirement benefits. This is calculated in line with International Accounting Standards (IAS) 19 every year using the same base data as the triennial funding valuation.

33. Hymans Robertson estimated that pension liabilities had increased by 11% from £319 million as at 31 March 2020 to £355 million at 31 March 2021 (£36 million increase). The value of the Fund's assets rose by £144 million over the same period and therefore the funding level increased from 118% to 146%.

34. In addition to the liability the actuary calculates the promised retirement benefits which have been estimated at £496 million at 31 March 2021 (2019/20-£353 million) showing a 40% increase. This estimate uses assumptions in line with IAS 26 requirements, for the purposes of the Fund's financial statements. It is not directly comparable to the liability measures on a funding basis.

Financial management arrangements were appropriate and effective

35. The financial regulations of the Council, as administering authority, apply to the Fund. We consider these to be comprehensive, and current, and promote good financial management.

36. Investment and administration performance reports are submitted to the Pension Fund Sub-Committee on a quarterly basis. Reports are comprehensive, covering analysis of fund managers, review of asset allocation and a review of the markets. Also, through our attendance at the

Pension Fund Sub-Committee, we have observed a good level of review and scrutiny by members.

37. Overall, the Fund has appropriate and effective financial management arrangements in place. This includes comprehensive reporting of investment performance.

Standards of conduct and arrangements for prevention and detection of fraud and error were appropriate

38. The Fund is responsible for establishing arrangements for the prevention and detection of fraud, error and irregularities, bribery and corruption. Furthermore, it is responsible for ensuring that its affairs are managed in accordance with proper standards of conduct by putting proper arrangements in place.

39. The risk profile of public bodies during 2020/21 has been significantly affected by the Covid-19 pandemic. This is likely to have increased the risk of fraud and error as control environments and internal controls have had to change to allow for services to operate effectively and respond to issues in a timely manner.

40. The Fund relies on the Council's arrangements for the prevention and detection of fraud and corruption. We have reviewed the arrangements put in place by the Council to address any heightened risks and concluded that there are appropriate arrangements for the prevention and detection of fraud, error and irregularities.

3. Financial sustainability

Financial sustainability looks forward to the medium and long term to consider whether the Fund maintains the capacity to meet the current and future needs of its members.

Main judgements

The triennial valuation as at March 2020 assessed the Fund as having sufficient assets to cover its liabilities, consequently contribution rates remained the same.

The Fund reviewed its investment strategy following the triennial valuation and plan to continue to diversify the investment structure to support income generation.

The results of the triennial valuation at March 2020 demonstrate that the fund remains fully funded

41. A full triennial valuation of the Fund was carried out at 31 March 2020 and reported to the Pension Fund Sub-Committee in February 2021. One of the main purposes of the triennial valuation is to inform the setting of pension contribution rates for the forthcoming 3 years and to inform a review of funding and investment strategies to ensure the continued payment of members' pension benefits as they fall due.

42. The March 2020 triennial funding valuation reported that the fund assets were sufficient to meet 118% of its liabilities. This is a slight increase from 112.7% in the 2017 valuation. The employer's contribution rate was set at 17% until 2023/24.

Financial planning arrangements are appropriate and effective

43. There is considerable volatility in pension funding and the results of the triennial valuation are in effect a snapshot of the Fund at 31 March 2020. Following each triennial valuation, it is standard practice to review the Funding Strategy Statement which is a summary of the Fund's approach to funding liabilities. Given the fully funded status reported in the triennial valuation the Fund did not deem it necessary to conduct a review of the Funding Strategy Statement and instead focused on its investment strategy.

44. The investment strategy outlines the types of investment to be held and the balances between the different types of investment. The investment strategy is set for the long-term but is monitored continually and reviewed every three years using asset-liability modelling to ensure that it remains appropriate to the profile of the Fund's liabilities.

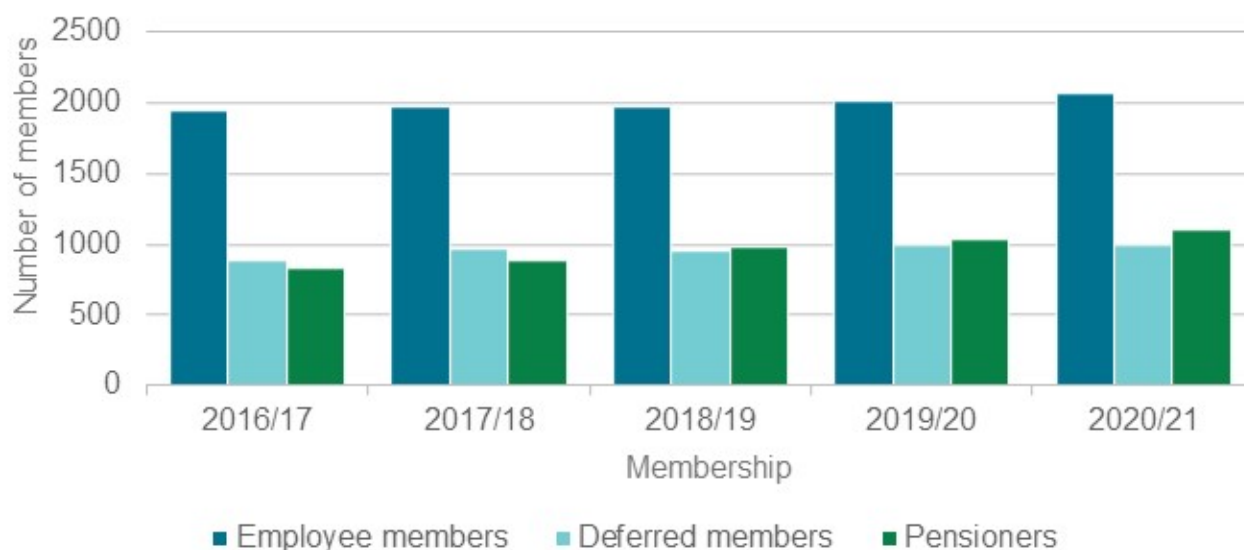
45. The last review was carried out in 2021 after the results of the triennial valuation. The revised investment strategy reflects the Fund's decision to focus on income generation to build capacity to fund annual benefits should they move to a net withdrawals position. The investment strategy therefore reflects a continued divestment in equities.

Fund membership levels continue to increase but the ratio of active members to pensioners is reducing

46. The Fund is a multi-employer fund with members from four admitted bodies in addition to members employed by Orkney Islands Council. This is a reduction from five admitted bodies in 2019/20 due to the transfer out of Visit Scotland members to the Lothian Pension Fund. The current membership profile is shown at [Exhibit 3](#). The number of active members continues to outweigh the number of pensioners.

47. The Fund gives its members a guarantee that in exchange for contributions during their employment, it will pay a pension until the end of each members' life. It is important that the fund maintains the capacity to meet the current and future pension entitlement of its members.

Exhibit 3 Orkney Islands Council Fund Membership



Source: Orkney Islands Council Pension Fund 2020/21 unaudited financial statements

48. Membership of the fund increased by 119 to 4,167 members at 31 March 2021, an increase in membership of 2.9%. The impact of auto-enrolment continues to contribute to the increase in employee members.

49. In 2020/21 the number of pensioners receiving a pension from the Fund increased by 63 and the number of pensioner members continues to increase

steadily each year. The number of active members continues to outweigh the number of pensioners.

50. Cash flows received from dealings with members continue to be positive as the contributions received in year exceed the amount paid out in benefits.

51. Future membership numbers are difficult to predict with any certainty as they are dependent on a number of factors including employer budgets, recruitment decisions, and promotion of the pension scheme.

52. With most employers still open to new membership and with continuing support from auto enrolment, the recent trend of growth in membership seems likely to continue for the foreseeable future.

Future rates of employer contributions have remained stable

53. Following the triennial valuation in 2020, the actuary agreed employer contribution rates with individual employers from 1 April 2021. For all member bodies the employer rate has remained at 17%. The approximate split of all contributions received in year is set out at [Exhibit 5](#).

Exhibit 4 Contributions in 2020/21

	Orkney Islands Council £m	Admitted bodies £m	Total £m
Employer contributions	6.906	0.763	7.669
Employee contributions	2.500	0.291	2.791
Strain Contributions	0.097	0.000	0.097

Source: Orkney Islands Council Pension Fund 2020/21 unaudited financial statements

54. The majority of Scottish Local Government Pension Schemes pay out more in pension benefits than they receive in pension contributions. The Fund is not yet in this position. This demonstrates a relatively good position in terms of financial sustainability as the Fund is not reliant on investment income to support annual payments to pensioners.

55. Nevertheless, the continued growth in pensioner numbers within the Fund's membership makes funding pension payments increasingly challenging. The Fund has considered this as part of its investment strategy and is further diversifying its investment structure to increase investment in income generating assets.

4. Governance and transparency

The effectiveness of scrutiny and oversight and the transparent reporting of information

Main Judgements

The governance arrangements introduced in response to the pandemic are appropriate and operated effectively.

There is effective scrutiny, challenge and informed decision making.

Governance arrangements operating throughout the Covid-19 pandemic have been appropriate and operated effectively

56. The Fund has made changes to its governance arrangements in response to the pandemic. The most significant change has been the move of the Sub-Committee meetings to be held remotely.

57. We reported last year that openness and transparency of the meetings could be improved by providing audio recordings via the Council website. The Fund considered this recommendation but felt the costs of audio-casting would outweigh the potential benefits.

58. The Sub-Committee papers are published on the Council website and the press attend meetings for publicly available items.

59. We have concluded that overall, the Fund has appropriate governance arrangements in place which support effective scrutiny, challenge and decision-making. We are satisfied that the approach to openness and transparency is appropriate for the needs of stakeholders.

There are effective arrangements for complying with the Pensions Regulator Public Service Code

60. The Public Sector Pensions Act 2013 provided for extended regulatory oversight by the Pensions Regulator. The Pensions Regulator issued a code on the governance and administration of public service pension schemes in January 2015 which funds are expected to comply with.

61. The Fund conducts a compliance review against the code on a regular basis and reports annually as part of the Annual Accounts through the Governance Compliance Statement. This provided assurance that the Fund is in compliance with the regulations.

62. There were no breaches of the code that required to be reported to the Pensions Regulator in 2020/21. In 2019/20 we identified that the Fund did not maintain a breaches register which heightens the risk that systematic issues are not identified by management. We understand that management are considering this recommendation and a breaches register is in development ([Appendix 1](#)).

Performance reporting was of a good standard

63. Management Commentaries included in the annual accounts should provide information on a body, its main objectives and the principal risks faced. It should provide a fair, balanced and understandable analysis of a body's performance as well as helping stakeholders understand the financial statements.

64. The Fund's 2020/21 management commentary is of good quality and is written with the stakeholder in mind. It presents some complex areas in an understandable style which increases transparency in reporting the financial performance and financial position.

5. Best Value

Using resources effectively and continually improving services

Main judgements

The pension administration function has performed well against targets despite added pressures from the Covid-19 pandemic.

Fund investment performance in 2020/21 has exceeded all agreed benchmarks as markets recover from the significantly reduced annual returns last year.

The Fund has effective arrangements in place for monitoring investment performance and scrutinising investment management expenses.

The pension administration function's performance against targets has been affected by added pressures from the pandemic, but performance in priority areas remained high

65. The Pension Fund Sub-Committee meets on a quarterly basis and receives regular reports on both fund administration and investment performance. The focus of measuring the performance of pensions administration includes both member experience and statutory compliance. Performance of the administration of the fund is summarised in [Exhibit 5](#) below.

Exhibit 5

Administration Performance

	Performance Standard (days)	Percentage processed within standard 2019/20	Percentage processed within standard 2020/21	Relative performance compared to prior year
Pension estimates	10	99.0 per cent	92.8 per cent	↓
Retirements	5	100.0 per cent	100 per cent	→
Transfers in	10	97.7 per cent	100 per cent	↑
Transfers out	10	100.0 per cent	100 per cent	→
Refunds	5	100.0 per cent	94.1 per cent	↓

Source: Orkney Islands Council Pension Fund 2020/21 unaudited financial statements

66. Service levels were maintained in the majority of areas; however they did fall in processing refunds and pension estimates as a result of additional pressure on staff due to Covid-19. It should be noted that the relatively small size of the fund and transactions involved mean that even small numbers of records not being processed can make significant percentage differences.

Fund investment performance in 2020/21 has exceeded all agreed benchmarks as markets recover from the significantly reduced annual returns last year

67. The Fund has appointed three external investment managers. Individual investment manager performance is reviewed regularly by the Pension Fund Sub-Committee.

68. Financial markets have largely recovered from last year's exceptional volatility, when returns against most asset classes, especially equities, reduced significantly due to the impact of the Covid-19 pandemic.

69. [Exhibit 6](#) shows that over the year, the Fund generated a return of 38.3% against a benchmark of 24.2%. Equity portfolios were the most significant contributor to this increase.

Exhibit 6

Fund investment performance



Source: Orkney Islands Council Pension Fund 2020/21 unaudited financial statements

70. Investment management outcomes are required to be considered over the longer term due to the range of factors which can influence returns including the risk appetite, asset allocation and general market performance.

71. As shown in [Exhibit 6](#) the Fund has exceeded the three and five year benchmarks which provides assurance that the investment portfolio is being managed appropriately.

Performance of investment managers is subject to scrutiny

72. The Fund used three fund managers during the course of 2020/21, Baillie Gifford, Legal and General Investment Management and Barings.

73. Investment manager performance is reported on a quarterly basis to the Pension Fund Sub-Committee and the Fund's external investment advisor attends the meetings in an advisory capacity when required.

74. The performance summaries presented to each meeting of the Sub-Committee include details of performance of individual mandates against benchmark for each quarter of the current year, and over the last three and five years. This allows members of the Sub-Committee to scrutinise investment performance and to question officers on the reasons for any under-performance.

75. In addition, the Finance team carry out reviews including consideration of internal controls for each of the fund managers. Due to the revised investment strategy 2.9 per cent of the Fund's asset value is not based on observable inputs. This makes it harder to validate the information provided by the fund managers.

76. We recommended in 2019/20 that the Fund conducted additional work to assure themselves that the asset valuations provided by the fund managers were reasonable and in line with expectation. From discussion with officers there has been limited progress with this recommendation in year ([Appendix 1 point 4](#)). We conducted procedures on the competence, capability and objectivity of fund managers to provide sufficient assurance on the figures in the financial statements.

The Fund adequately scrutinises investment management expenses

77. There are three main categories of management expense, with the largest being investment management costs. Other expenses are the cost of the administration services provided by the Council and oversight and governance costs.

78. Investment management expenses have increased from £1.663 million in 2019/20 to £1.905 million in 2020/21. Investment manager expenses can vary due to a number of factors including actual returns on investments and the nature of investment assets held. The main reason for this increase in expenses relates to the 38.3% increase in asset value.

79. The Fund has adequate arrangements in place for monitoring investment performance and scrutinising investment management expenses.

80. Administrative expenses have increased by £0.01 million in 2020/21 to £0.32 million. The workload of the pension administration section

continues to grow, primarily due to the introduction of the career average pension scheme (CARE) from 1 April 2015. Other factors impacting on the administration workload include auto enrolment, freedom of choice, and work arising from the Guaranteed Minimum Payment Reconciliation.

National performance audit reports

81. Audit Scotland carries out a national performance audit programme on behalf of the Accounts Commission and the Auditor General for Scotland. During 2020/21, we published reports which may be of interest to the Fund. These are outlined in [Appendix 4](#) accompanying this report.

Appendix 1

Action plan 2020/21

Follow-up of prior year recommendations

Issue/risk	Recommendation	Agreed management action/timing
<p>1. Whistleblowing policy</p> <p>A revised whistle blowing policy was approved by the Human Resources Sub-Committee, however, the contact information for Audit Scotland was out of date.</p> <p>Risk</p> <p>Whistle blowers would be unable to contact Audit Scotland using the information within the whistleblowing policy.</p>	<p>We recommend the whistleblowing policy is updated with the correct Audit Scotland contact information.</p>	<p>Complete</p> <p>We reviewed the Whistleblowing Policy and the contact details have now been updated.</p>
<p>2. Audio casting of the Pension Fund Sub-Committee</p> <p>Minutes of all Pension Fund Sub-Committees are published on the Orkney Islands Council website. There is scope to improve transparency by including access to audio casting.</p> <p>Risk</p> <p>There is a risk that the business of the Pension Fund Sub-Committee is not seen to be transparent.</p>	<p>We recommend that the Fund considers using audio casting for meetings of the Pension Fund Sub-Committee to improve openness and transparency.</p>	<p>Complete</p> <p>The Fund considered this recommendation but felt the costs of audio-casting would outweigh the potential benefits.</p> <p>However, as a result of the impact of Covid-19 on all committee meetings of the Council a review of audio casting of Council meetings has been undertaken and will be reported to the Policy and Resources Committee on 23 November 2021 and will recommend that audio casting provision be extended to include meetings of the Pension Fund Sub-committee, together with Pension Board where they</p>

Issue/risk	Recommendation	Agreed management action/timing
<p>3. Breaches register</p> <p>There is no register held by the Fund detailing the breaches of the Pensions Regulator Public Service Code in year.</p> <p>Risk</p> <p>There is a risk that an issue is not raised with management which requires to be reported</p>	<p>We recommend the Fund creates a register of all breaches to inform the decision over whether to report issues to the Pensions Regulator.</p>	<p>are held in the Council Chamber.</p> <p>In progress</p> <p>The Register of Breaches will be created by the Pension and Payroll Manager by the end of November.</p>
<p>4. Validation of fund manager valuations</p> <p>Barings provided a valuation of investments held at 31 March 2020. From our review of the document it was not possible to identify the Fund's share of assets. No work has been conducted by the Fund to validate the valuation provided by Barings.</p> <p>Risk</p> <p>There is a risk that a misstatement in the valuation is not noticed by the Fund on a timely basis.</p>	<p>We recommend the Fund conducts work to assure themselves that asset valuations provided by the fund manager are reasonable and in line with expectation.</p>	<p>Outstanding</p> <p>The Fund receives regular Net Asset Valuation statements from the Fund Manager detailing both the number of units held and the current market value of those units. Being a pooled fund, individual investors hold multiple units in the Fund rather than a direct share of the fund's assets themselves. Assurance regarding the valuation of fund assets was taken from the actions of the Fund Manager during the year to outsource the valuation of the fund assets to an external valuer during the year.</p> <p>It is also considered that the regular preparation of the performance reports by Investment Advisers provides assurance that the asset valuations provided by the fund manager are reasonable and in line with expectation.</p>
<p>5. Altair access rights</p> <p>The access rights to the Altair system are generic and are</p>	<p>We recommend that Altair system rights are tailored to</p>	<p>Complete</p> <p>Access has been reviewed, however due to the small size</p>

Issue/risk	Recommendation	Agreed management action/timing
<p>the same for all those within the pensions team. We did not identify any issues in relation to access rights as part of our audit testing.</p> <p>Risk</p> <p>There is a risk of fraud or error arising from inappropriate user permissions</p>	<p>the needs of the individual user.</p>	<p>of the pensions team no significant changes to access rights have been made.</p> <p>We are satisfied that the risk associated with the access levels is low.</p>
<p>6. Pension and payroll reconciliations</p> <p>Our testing found that there is no reconciliation between the pensions system and the payroll system on a regular basis. Our testing did not find a significant variance at the year end between the systems.</p> <p>Risk</p> <p>There is a risk that payments made to pensioners via payroll are not in line with the calculated amounts on the pension system</p>	<p>We would recommend that reconciliations between the payroll system and the pensions system are carried out on a monthly basis.</p>	<p>Complete</p> <p>A monthly reconciliation between the Payroll System and General Ledger is part of existing Payroll procedures. Completion of the reconciliations had slipped but has now been brought up to date.</p>
<p>7. Payments to overseas pensioners</p> <p>The fund currently has procedures for identifying deceased pensioners living in the UK but there are no such procedures for pensioners who live abroad. There are currently only 7 members who do not live in the UK.</p> <p>Risk</p> <p>There is a risk that overpayments are made due to the failure to identify a deceased member.</p>	<p>We recommend procedures are in place to mitigate overpayments relating to pensioners living abroad.</p>	<p>Complete</p> <p>Procedures to confirm 'proof of life' for pensioners living abroad have been introduced. Letters were sent to all overseas pensioners.</p>

Appendix 2

Significant audit risks identified during planning

The table below sets out the audit risks we identified during our planning of the audit and how we addressed each risk in arriving at our conclusion. The risks are categorised between those where there is a risk of material misstatement in the annual accounts and those relating our wider responsibility under the [Code of Audit Practice 2016](#).

Audit risk	Assurance procedure	Results and conclusions
<p>1. Management override of controls</p> <p>International Auditing Standards require that audits are planned to consider the risk of material misstatement in the financial statements caused by fraud, which is presumed to be a significant risk in any audit. This includes the risk of fraud due to the management override of controls.</p>	<p>Detailed testing of journal entries.</p> <p>Review of accounting estimates and judgements.</p> <p>Focused testing of accruals and prepayments.</p> <p>Evaluation of significant transactions that are outside the normal course of business.</p>	<p>We have not identified any instances of management override from our testing.</p>
<p>2. Estimation, judgements and Classification</p> <p>There is a significant degree of subjectivity in the measurement and valuation of investments. Investments include level 3 investments such as pooled funds and other unquoted investments.</p> <p>Investments of this nature are based on judgements taken by investment managers and are complex and difficult to value.</p>	<p>Completion of 'review of the work of an expert' in accordance with ISA 500, for fund managers with significant unquoted investments.</p> <p>Confirmation of valuations to valuation reports and/ or other supporting documentation.</p> <p>Sample testing of investments to independent pricing sources.</p>	<p>We gained appropriate assurance over the competence, capability and objectivity of the fund managers, the custodian and the actuary.</p> <p>The valuations were agreed to valuation reports provided by the custodian and the fund managers. A sample of investments were agreed back to third party information.</p> <p>The assumptions used by the actuary were compared to benchmark information and we concluded that these were reasonable.</p>

Audit risk	Assurance procedure	Results and conclusions
		There were no issues arising from our work on estimates and we have concluded there is sufficient assurance to support our audit opinions.

Appendix 3

Summary of national performance reports 2020/21

April

[Affordable housing](#)

June

[Highlands and Islands Enterprise: Management of Cairngorm mountain and funicular railway](#)

[Local government in Scotland Overview 2020](#)

July

[The National Fraud Initiative in Scotland 2018/19](#)

January

[Digital progress in local government](#)

[Local government in Scotland: Financial overview 2019/20](#)

February

[NHS in Scotland 2020](#)

March

[Improving outcomes for young people through school education](#)

Orkney Islands Council Pension Fund

2020/21 Annual Audit Report

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