

Internal Audit Report Pension Fund External Control Assurance

Final

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Internal Audit Report – Pension Fund External Control Assurance 2017/18

Report Distribution List

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Internal Audit Report - Pension Fund External Control Assurance 2017/18

1. Introduction

- 1.1. There are currently 12 different investment fund managers who invest on behalf of the East Sussex Pension Fund. The pension fund comprises over 120 scheme employers with 23,567 employee members and 28,853 deferred members, as at March 2017. At the last assessment the value of the Fund was over £2.77bn.
- 1.2. Each pension investment fund managers is required to obtain an external independent assurance on how robust their administrative and accounting control procedures are on an annual basis. This will remain a reporting requirement when the East Sussex Pension Fund transfers to A Collaboration of Central, Eastern and Southern Shires (ACCESS) investment pool in 2018/19.
- 1.3. This audit examined the controls employed by the Council to ensure that independent and reliable external assurance is obtained on the pension investment fund managers' administrative and accounting control procedures.
- 1.4. This review is part of the agreed Internal Audit Plan for 2017/18.
- 1.5. This report has been issued on an exception basis whereby only weaknesses in the control environment have been highlighted within the main body of the report.

2. Scope

- 2.1. The purpose of the audit was to provide assurance that controls are in place to meet the following objectives:
 - The County Council has identified and receives all sources of external control assurance for its pension fund investments and such information is formally reviewed.
 - The various sources of information regarding fund manager and custodian internal control provide the County Council, as administering authority for the pension fund, with adequate assurance. Where they do not, appropriate action is taken.

3. Audit opinion

3.1. **Substantial Assurance** is provided in respect of the Pension Fund External Control Assurance. This opinion means that controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives.

Appendix A provides a summary of the opinions and what they mean and sets out management responsibilities.

Internal Audit Report – Pension Fund External Control Assurance 2017/18

4. Basis of Opinion

- 4.1. We have been able to provide **Substantial Assurance** over the controls operating within the area under review because:
 - All the Council's pension investment fund managers obtain assurance in respect of their administrative and accounting control procedures on an annual basis.
 - The assurance is provided by External Auditors that are independent of the pension investment fund managers.
 - The assurance engagements were completed in accordance to recognised good practice assurance reporting standards/framework such as the Institute of Chartered Accountants in England and Wales (ICAEW) Technical Release AAF 01/06 or the American Institute of Certified Public Accountants' Statement on Standards for Attestation Engagements (SSAE) No. 16.
 - The Council's pension officers review the assurance reports for any material issues/findings.
 - Respective Auditors for all fund managers provided a reasonable assurance opinion on the suitability and effectiveness of the controls in place.

In providing our opinion, it should be noted that:

Minor exceptions were raised in the majority of assurance reports and our testing
identified two instances where exceptions from the previous audit report were identified
again by the assurance provider. However, the fund managers have responded to each
exception raised, and there is no assertion from the assurance providers that the
exceptions that they have identified exposes the East Sussex Pension Fund investments
to any financial risk.

5. Action Summary

| Risk Priority | Definition | No | Ref |
|------------------|--|----|-----|
| High | Major control weakness requiring immediate implementation | 0 | - |
| Medium | Existing procedures have a negative impact on internal control or the efficient use of resources | 0 | - |
| Low | Represents good practice but its implementation is not fundamental to internal control | 0 | - |
| | Total number of agreed actions | 0 | |

6. Acknowledgements

6.1. We would like to thank all staff that provided assistance during the course of this audit.

Appendix A

Audit Opinions and Definitions

| Opinion | Definition | |
|--------------------------|---|--|
| Substantial Assurance | Controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives. | |
| Reasonable Assurance | Most controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives. | |
| Partial Assurance | There are weaknesses in the system of control and/or the level of non-compliance is such as to put the achievement of the system or service objectives at risk. | |
| Minimal Assurance | Controls are generally weak or non-existent, leaving the system open to the risk of significant error or fraud. There is a high risk to the ability of the system/service to meet its objectives. | |

Management Responsibilities

The matters raised in this report are only those which came to our attention during our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

This report, and our work, should not be taken as a substitute for management's responsibilities for the application of sound business practices. We emphasise that it is management's responsibility to develop and maintain sound systems of risk management, internal control and governance and for the prevention and detection of irregularities and fraud. Internal Audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.