



**Audit completion report  
London Borough of Camden Pension Fund – year ended 31 March 2025**

November 2025

Members of the Audit and Corporate Governance Committee

London Borough of Camden Pension Fund

5 Pancras Square

London

N1C 4AG

06 November 2025

Forvis Mazars  
30, Old Bailey  
London  
EC4M 7AU

Dear Committee Members,

## **Audit Completion Report – Year ended 31 March 2025**

We are pleased to present our Audit Completion Report for the audit of the London Borough of Camden Pension Fund's ("the Fund") accounts for the year ended 31 March 2025. The purpose of this report is to summarise our audit findings and conclusions.

This report is intended solely for Audit and Corporate Governance Committee for the purpose of communicating certain matters that, in our professional judgement, are relevant to your oversight of the financial reporting process. To the fullest extent permitted by law Forvis Mazars LLP accepts no responsibility and disclaims all liability to any third party who purports to use or rely for any reason whatsoever on the report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification. Accordingly, any reliance placed on the report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification by any third party is entirely at their own risk.

We appreciate the courtesy and co-operation extended to us by the finance team throughout our audit. We would be happy to discuss the contents of this report, or any other matters regarding our audit, with you in more detail.

Yours faithfully



Suresh Patel

Forvis Mazars LLP

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Our reports are prepared in the context of the 'PSAA Statement of Responsibilities of Auditors and of Audited Bodies' and the 'Appointing Person Terms of Appointment' issued by Public Sector Audit Appointments Limited. This document is to be regarded as confidential to the Pension Fund. It has been prepared for the sole use of Audit and Corporate Governance Committee as the appropriate sub-committee charged with governance. We do not accept any liability or responsibility to any other person in respect of the whole or part of its contents.

# 01

## Executive Summary

# Executive summary

## Scope

We have been engaged to audit the financial statements of London Borough of Camden Pension Fund for the year ended 31 March 2025 which are prepared in accordance with the 2024/25 Code of Practice on Local Authority Accounting.

Our audit of the financial statements will be conducted in accordance with International Standards on Auditing (UK), relevant ethical and professional standards, our own audit methodology, and in accordance with the Code of Audit Practice.

## Audit status

Our audit procedures are now substantially complete for the year ended 31 March 2025.

Please refer to the '*Status of our audit*' section for a list of significant audit matters outstanding at the date of this report. We will provide an update to Audit and Corporate Governance Committee on completion of those outstanding matters by way of a follow-up letter.

## Areas of focus and audit approach, and significant findings

We have not made any changes to our initial risk assessment and planned audit approach that was communicated to Audit and Corporate Governance Committee in our Audit Strategy Memorandum.

In section 4 of this report we have set out our conclusions and significant findings from our audit. This section includes our conclusions on the audit risks and areas of management judgement in our Audit Strategy Memorandum, which include:

- Management Override of Controls; and
- Valuation of investments within level 3 of the fair value hierarchy.

## Significant control deficiencies

We did not identify any significant deficiencies in internal control, but we have identified three other internal control matters reported in Appendix A.

## Audit misstatements

A summary of the adjusted and unadjusted misstatements above our reporting threshold we have identified to date is set out in section 5. The most significant misstatements are misclassifications of investment assets within the disclosure notes in the accounts, which have been amended for in both the 2024/25, and 2023/24 disclosures.

## Audit opinion

We issued a qualified opinion on the Pension Fund's 2023/24 accounts because of the disclaimed opinion we issued on the 2022/23 accounts to meet the statutory backstop requirements. As planned, we have carried out procedures and obtained sufficient assurances that mean for 2024/25, and subject to concluding the remaining audit work as outlined on page 8, we anticipate issuing an unqualified opinion without modification, as set out in Appendix C.

At the time of issuing this report and subject to the satisfactory conclusion of our remaining audit work, we anticipate issuing an unqualified opinion, without modification, as set out in Appendix C.

## Consistency Report

We anticipate concluding that the Pension Fund financial statements within the Pension Fund's Annual Report are consistent with the Pension Fund financial statements within the Statement of Accounts of London Borough of Camden Council. Our draft consistency report is provided in Appendix D.

## Wider reporting powers

The 2014 Act requires us to give an elector, or any representative of the elector, the opportunity to question us about the accounting records of the Pension Fund and to consider any objection made to the accounts. There were no objections on the Pension Fund accounts.

# Executive summary

## Qualitative aspects of the Fund's accounting practices

We have reviewed Camden Pension Fund's accounting policies and disclosures and conclude that they comply with the 2024/25 Code of Practice on Local Authority Accounting, appropriately tailored to the Fund's circumstances.

The Council published draft accounts of the Pension Fund on 30 June 2025 and they were of a good quality.

## Significant difficulties during the audit

We have not encountered any significant difficulties and we have had the full co-operation of management.

## Other matters of significance

We encountered no significant difficulties during our audit and had no significant disagreements with management. There was effective co-operation and communication between Forvis Mazars, management, and Audit and Corporate Governance Committee during our audit. All requested information and explanations were provided to us.

Other matters we are required by ISA (UK) 260 *Communication with Those Charged with Governance* to communicate to you have been set out in Appendix E.

# 02

## Status of the audit

# Status of our audit

Our audit work is substantially complete, with a small number of outstanding matters set out below.

## Related parties testing

Our work on the Pension Fund's related party disclosures is ongoing, and we anticipate that this will be completed shortly.



## Audit completion

We need to complete standard closing procedures, including

- Assessing the impact of any post balance sheet events up to the point of signing the audit report; and
- Obtaining from the pension fund the signed letter of management representation



## Quality control / review

This includes review by the Engagement Lead and the process will continue up to the point of signing. There are no specific matters to date, but further file review may result in a small number of queries.



## Review of annual report

Our review of the content of the detailed Pension Fund Annual report to confirm consistency with the financial statements has yet to be completed.



## Status

 Likely to result in a material adjustment or a significant change to disclosures in the financial statements.

 Potential to result in a material adjustment or a significant change to disclosures in the financial statements.

 Not considered likely to result in a material adjustment or a change to disclosures in the financial statements.

# 03

## Audit approach and risk summary

# Audit approach and risk summary

## Changes to our audit approach

There have been no changes to the audit approach we communicated in our Audit Strategy Memorandum, issued in March 2025

## Materiality

Our provisional materiality at the planning stage of our audit was set at £20.939 million using a benchmark of 1% of net assets in the 2023/24 statement of accounts as per the Audit Strategy Memorandum.

Based on the final 2024/25 statement of accounts and having applied the same benchmarks as outlined in our Audit Strategy Memorandum, the final overall materiality we applied was £21.711 million (final performance materiality: £17.369 million, final clearly trivial threshold: £0.651 million).

For the Fund Account, the final specific materiality we applied was £8.393 million (final performance materiality: £6.714 million).

## Use of experts

Item of Account	Management's expert	Our expert
Disclosure notes on funding arrangements and actuarial present value of promised retirement benefits	Hymans Robertson, Actuaries	NAO consulting actuary PwC
Valuation of investments within level 2 and level 3 of the fair value hierarchy and related disclosures	Investment managers engaged by the fund that prepare valuations	Not required
Investment assets fair value hierarchy disclosure	Isio, pensions and investment consultants	Not required

## Service organizations

Item of Account	Service organisation	Audit approach
The calculation and payment of pension benefits, assessment of funding levels based on existing pensioner data.	Wandsworth Borough Council	We obtained appropriate confirmation that the Council's controls and procedures have operated as designed throughout the year and that no weaknesses have been identified that would have a material impact on the information they provide to the Camden Pension Fund.
Investment valuations and income and all related disclosures	Investment managers	We obtained direct confirmations from the fund managers and substantively tested transactions occurring in the year and the valuations applied to investments at the year end.
Investment valuations and income and all related disclosures	Custodian	We obtained direct confirmations from the custodians and substantively tested transactions occurring in the year and the valuations applied to investments at the year end.

# Audit fees and other services

## Fees for audit and other services

Our fees (exclusive of VAT and disbursements) for the audit of the Pension Fund for the year ended 31 March 2025 are outlined below. We have not provided any non-audit services.

### Audit Fees

We outline below the PSAA scale fee and the areas of additional fees we expect for 2024/25.

Area of work	2024/25 Proposed Fee	2023/24 Actual Fee
PSAA scale fee	£83,937	£69,672
Additional fees:		
Additional testing in respect of revised auditing standards (ISA315R)	Baked into the scale fee	£7,840
Testing level 3 investments	£7,000	£5,000
Prior year comparator testing	N/A	£35,000
<b>Total Fees</b>	<b>£90,937</b>	<b>£117,512</b>

# 04

## Significant findings

# Significant findings

The significant findings from our audit include our conclusions regarding the significant risks and key areas of management judgement outlined in our Audit Strategy Memorandum are set out in this section:

## Significant risk – management override of controls

### Description of risk

This is a mandatory significant risk on all audits due to the unpredictable way in which such override could occur.

Management at various levels within an organisation are in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. The unpredictable way in which such override could occur means there is a risk of material misstatement due to fraud.

### Our audit response

We addressed this risk by carrying out audit work in the following areas:

- accounting estimates impacting amounts included in the financial statements;
- consideration of identified significant transactions outside the normal course of business; and
- journals recorded in the general ledger and other adjustments made in preparation of the financial statements.

Our work on journals included identifying and analysing the total population of journals posted by the Pension Fund during the year and as part of the account's preparation process. We identified a range of fraud risk factors that we then applied to the population and tested the validity of any journals that we identified for testing.

### Analysis of our work performed

The analysis below details the Pension Fund's posting pattern for the number of lines posted to the general ledger month by month in the form of manual journals.

In total, 1,107 lines were manually posted to the ledger. The analysis above demonstrates a peak in the final month as a journals being posted as part of the year end accounts closedown process.



We applied our fraud risk factors to the population of 1,107 journals and identified 14 that met at least one of these factors. We tested all 14, which involved agreeing the items back to sufficient appropriate evidence. We did not identify any instances of management override of controls.

Following the completion of our audit work, we performed a full stand back assessment of the material estimates tested as part of our wider audit. We identified no characteristics of management bias. We have not identified any significant transactions outside the normal course of business.

### Audit conclusion

We have completed our planned procedures and have not identified evidence of management override of controls. We have no matters to report in respect of this risk.

# Significant findings

## Significant risk – valuation of investments within level 3 of the fair value hierarchy

### Description of risk

The Pension Fund holds investments which are not quoted on an active market and these make up a significant proportion of the Pension Fund's investment assets. Inherently these assets are harder to value, as they do not have publicly available quoted prices from a traded market, and as such they require professional judgement or assumptions to be made when valuing them at year end.

As the pricing of these investment assets is subject to judgements, they may be susceptible to pricing variances due to the assumptions underlying the valuation. We therefore consider that there is an increased risk of material misstatement.

As at 31 March 2025 the fair value of investments classified within level 3 of the fair value hierarchy was £368 million.

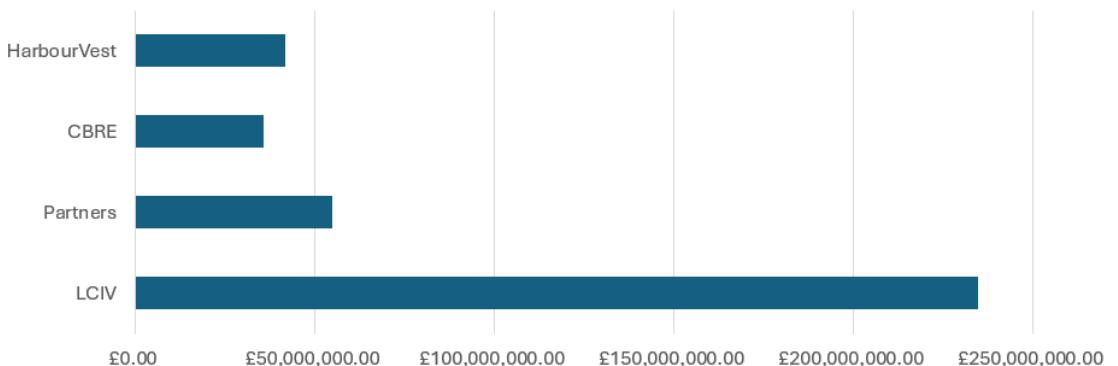
### Our audit response

We addressed this risk by completing the following additional procedures:

- obtaining confirmations of valuations directly from investment fund managers and agreeing their valuations to the figures disclosed in the accounts;
- obtaining fund manager ISAE 3402 Control Reports, confirming that the assets have been independently valued and reviewing for any exceptions which may impact the Pension Fund's investment asset valuations; and
- agreeing the Pension Fund's share of the fund to the fund's net assets held within their financial statements.

### Analysis of our work performed

The Pension Fund's investment asset portfolio comprises of 4 main types of asset (Pooled Funds, Equities, Property and Private Equity). These are held by 4 separate fund managers being HarbourVest, CBRE, Partners Group and LCIV. The balance of holdings per fund manager are summarised below:



We have tested a sample of 14 investment assets (totalling £350m) from the level 3 population for 2024/25, completing all our procedures as planned.

### Audit findings and conclusion

We have completed our planned procedures regarding the valuation of investments within level 3 of the fair value hierarchy. We have identified an unadjusted misstatement of £0.843 million, which relates to differences between the valuation of investments disclosed in the financial statements and external confirmations provided by fund managers. We provide further details in section 5.

# Significant findings

## Enhanced risk – valuation of investments within level 2 of the fair value hierarchy

### Description of risk

As at 31 March 2025 the fair value of investments classified within level 2 of the fair value hierarchy was £1,495 million. This is the balance within the final statement of accounts, after the fund reclassified £25.5 million of level 1 investment assets to the level 2 fair value hierarchy during our audit.

The values included in the accounts are primarily based on recent trades of the investment, which are observable inputs other than quoted prices.

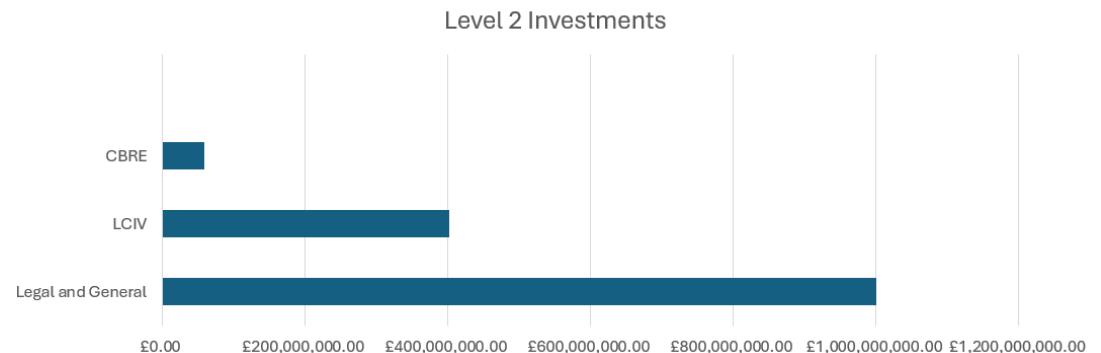
The valuation risk is increased depending on the elapsed time of the most recent trade and the year end and, therefore, these valuations have been assessed as an enhanced risk

### Our audit response

- obtaining confirmations of valuations directly from investment fund managers and agreeing their valuations to the figures disclosed in the accounts;
- obtaining fund manager ISAE 3402 Control Reports, confirming that the assets have been independently valued and reviewing for any exceptions which may impact the Pension Fund's investment asset valuations.

### Analysis of our work performed

The Pension Fund's Level 2 investment asset portfolio comprises of 2 main types of asset (Property and Pooled Funds). These are held by 3 separate fund managers being CBRE, LCIV and Legal and General. The balance of holdings per fund manager are summarised below:



We have tested a sample of 16 investment assets (totalling £1,477m) from the level 2 population for 2024/25, completing all our procedures as planned.

### Audit findings and conclusion

We have completed our planned procedures and have no matters to report in respect of this risk.

# Significant findings

## Wider responsibilities

Our powers and responsibilities under the 2014 Act are broad and include the ability to:

- issue a report in the public interest;
- make statutory recommendations that must be considered and responded to publicly;
- apply to the court for a declaration that an item of account is contrary to law; and
- issue an advisory notice under schedule 8 of the 2014 Act.

We have not exercised any of these powers as part of our 2024/25 audit.

The 2014 Act also gives rights to local electors and other parties, such as the right to ask questions of the auditor and the right to make an objection to an item of account. No such objections have been raised to the Pension Fund accounts.

## Confirmation of our independence

We communicate any matters which we believe may have a bearing on the independence or the objectivity of Forvis Mazars LLP and the audit team. As part of our ongoing risk assessment, we monitor our relationships with you to identify any new actual or perceived threats to our independence within the regulatory or professional requirements governing us as your auditors.

We confirm that no new threats to independence have been identified since issuing our Audit Strategy Memorandum and therefore we remain independent.

# 05

## Summary of misstatements

# Summary of misstatements

## Unadjusted misstatements

Our overall materiality, performance materiality, and clearly trivial (reporting) threshold were reported in our Audit Strategy Memorandum, issued in March 2025. Any subsequent changes to those figures are set out in section 3 of this report.

Management has assessed the misstatements in the table below as not being material, individually or in aggregate, to the financial statements and does not plan to adjust. We only report to Audit and Corporate Governance Committee unadjusted misstatements that are either material by nature or which exceed our reporting threshold.

Description	Entity	Nature	Fund Account		Net Asset Statement	
			Dr (£ '000)	Cr (£ '000)	Dr (£ '000)	Cr (£ '000)
Dr: Profit and loss on disposal of investments and changes in the market value of investments						
Cr: Investment Assets						
These differences have been identified during our testing of investment assets held by the Pension Fund. The pension fund is provided with valuation by its custodian at year end, based on preliminary valuations provided to the Custodian by fund managers, which it inputs into its financial statement. We have obtained the final year end valuation confirmations from fund managers at year end, which have variances from the balances recorded in the financial statement		Extrapolated	843			843
<b>Aggregate effect of unadjusted misstatements</b>			<b>843</b>	<b>0</b>	<b>0</b>	<b>843</b>

We will obtain written representations confirming that, after considering the unadjusted misstatements, both individually and in aggregate, in the context of the financial statements taken as a whole, no adjustments are required.

# Summary of misstatements

## Disclosure misstatements 2024/25

We identified the following disclosure misstatements during our audit that have been corrected by management:

- Note 7 Benefits Payables: information relating to the split of benefits payable by employers was not available at the time of publishing the draft accounts, this has now been updated
- Note 13 Reconciliation of Movements in Investments: £151,377,000 of 'Property' assets and £41,801,000 of 'Private equity' assets has now been correctly recognised under directly owned assets from Pooled investment assets.
- Note 15A Fair Value – Basis of Valuation: classification errors in the fair value hierarchy disclosure of investment assets:
  - £3,814,000 of cash has been reclassified from Level 2 to Level 1
  - £29,278,000 of pooled fund has been reclassified from Level 1 to Level 2
- Note 15A Fair Value – Basis of Valuation: Investment assets have been reclassified as following; £58,732,000 from pooled funds to Property, £90,934,000 from pooled funds to private equity, £13,979,000 from equities to cash equivalents and £3,249,000 from cash equivalents to cash & currencies
- Note 15A Fair Value – Basis of Valuation: £3,801,000 of included accrued investment income was incorrectly classified as equities. This has been reclassified as investment receivables.
- Note 24 Contractual Capital: Information relating to contractual commitments was not available at the time of publishing the draft accounts, this has now been included
- Note 25 Additional Voluntary Contributions: Information relating to AVC contributions was not available at the time of publishing the draft accounts, this has now been included

# Summary of misstatements

## Disclosure misstatements 2023/24

The following misstatements within the 2023/24 disclosures in the Pension Fund's accounts have been adjusted for to ensure consistency between the 2024/25 figures, following the adjustments made as outlined in page 19, and the prior year comparators. The adjustments made to the 2023/24 disclosures are as follows: :

- Note 15A Fair Value – Basis of Valuation: classification errors in the fair value hierarchy disclosure of investment assets:
  - £430,455k of pooled funds has been reclassified from Level 1 to Level 2
  - £33,127k of property funds have been reclassified from Level 2 to Level 3
- Note 15A Fair Value – Basis of Valuation: Investment assets have been reclassified as following; £62,240k of cash & currencies to cash equivalents, £151,377k of pooled funds to property and £47,644k of pooled funds to private equity

# 06

## Fraud considerations

# Fraud considerations

We have a responsibility to plan and perform our audit to obtain reasonable assurance that the financial statements are free from material misstatement, whether due to fraud or error.

## Your responsibilities

Management has primary responsibility for the prevention and detection of fraud. It is important that management, with Audit and Corporate Governance Committee oversight, place a strong emphasis on fraud prevention, which may reduce opportunities for fraud to take place, and fraud deterrence, which could persuade individuals not to commit fraud because of the likelihood of detection and punishment. This involves a commitment to creating a culture of honesty and ethical behaviour which is reinforced by Audit and Corporate Governance Committee's active oversight.

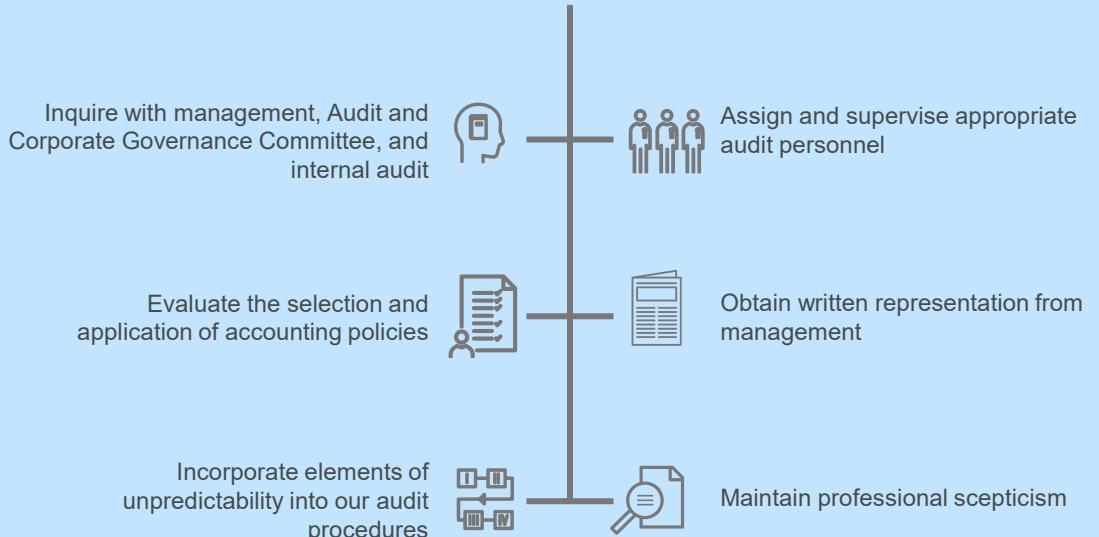
## Our responsibilities

We have a responsibility for obtaining reasonable assurance that the financial statements taken as a whole are free from material misstatement, whether due to fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in a misstatement is intentional or unintentional. Two types of intentional misstatements are relevant to us – misstatements resulting from fraudulent financial reporting, and misstatements resulting from the misappropriation of assets.

## ISA presumed fraud risks

As set out in the 'Audit approach and risk summary' section, the risks of fraud in management override of controls were identified as significant risks.

## Our overall approach to fraud



## Our overall conclusion

We did not identify any actual or suspected fraud involving management, employees with significant roles in Camden Council's internal control or others, where the fraud resulted in a material misstatement in the Council's financial statements.

# Appendices

- A: Internal control conclusions
- B: Draft management representation letter
- C: Draft audit report
- D: Draft consistency report
- E: Other communications

# Appendix A: Internal control conclusions

As part of our audit, we obtained an understanding of the Fund's internal control environment and control activities relevant to the preparation of the financial statements, which was sufficient to plan our audit and determine the nature, timing, and extent of our audit procedures. Although our audit was not designed to express an opinion on the effectiveness of the Fund's internal controls, we are required to communicate to Audit and Corporate Governance Committee any significant deficiencies in internal controls that we identified in during our audit.

## Deficiencies in internal control

A deficiency in internal control exists if:

- A control is designed, implemented, or operated in such a way that it is unable to prevent, detect, and/ or correct potential misstatements in the financial statements; or
- A control that is necessary to prevent, detect, and/ or correct misstatements in the financial statements on a timely basis is missing.

The purpose of our audit was to express an opinion on the financial statements. As part of our audit, we have considered the Fund's internal controls relevant to the preparation of the financial statements to design audit procedures to allow us to express an opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal controls or to identify any significant deficiencies in their design or operation.

The matters reported in this section of our report are limited to those deficiencies and other control recommendations that we have identified during our normal audit procedures and which we consider to be of sufficient importance to merit being reported.

If we had performed more extensive procedures on internal control, we might have identified more deficiencies to report or concluded that some of the reported deficiencies need not in fact have been reported.

Our comments in this section should not be regarded as a comprehensive record of all deficiencies that may exist or improvements that could be made.

## Significant deficiencies in internal control

A significant deficiency in internal control is one which, in our professional judgement, has the potential for financial loss, damage to reputation, or a loss of information which may have implications on the achievement of business strategic objectives. Our view is that observations categorised as a significant deficiency is of sufficient importance to merit the attention of Audit and Corporate Governance Committee.

We have identified no significant deficiencies in the Fund's internal controls as at the date of this report.

## Other observations

We also record our observations on the Fund's internal controls where, in our professional judgement, there is a need to strengthen internal control or enhance business efficiency that do not constitute significant deficiencies in internal control but which we view as being important for consideration by management.

The other control deficiencies that we have identified as at the date of this report are set out on page 25, with our follow up to an other control deficiency identified during our audit of the 2023/24 Pension Fund accounts set out on page 26.

# Appendix A: Internal control conclusions

## Other deficiencies in internal control

### 1. Review of work completed by experts

#### Description of deficiency

For the disclosure of fair value of investment assets, management engaged external experts to review assets and determine their classification. However, management did not perform a comprehensive review of the work the experts completed, some of which contained immaterial misstatements, which are outlined within page 19 of this report.

#### Potential effects

There is a risk that work performed by management expert is not code compliant and management are unable to identify errors before information is disclosed in the accounts

#### Recommendation

Management should review the work completed by their experts regarding fair value classifications of investment assets.

#### Management response

Management will include a second review on fair value disclosures from Investment assets to mitigate the risk of misstatements in future.

### 2. Use of prior year data to determine fair value hierarchy level of investment assets

#### Description of deficiency

For the disclosure of fair value of investment assets, management had determined their classification based on the review they conducted for the 2023/24 financial year. Rather than completing a review for 2024/25 to ensure any changes to classifications have been captured

#### Potential effects

There is a risk that valuation method applied to investment assets has changed within the year and therefore disclosure in the accounts is incorrect

#### Recommendation

Management should ensure that fair value hierarchies of investment assets are reviewed annually.

#### Management response

Management engaged an expert to review the 2023–24 and 2024–25 fair value disclosures in the pension fund accounts. While the 2023-24 review was undertaken, the 2024-25 accounts were being completed concurrently, and with no change in investments between years, the approach used in 2023-24 was rolled over in 2024-25. This was necessary due to the compressed timeline for completing multiple sets of accounts due to the backstop. With the backlog now resolved, this one-off issue will not recur in future years.

# Internal control conclusions

## Follow up on previous internal control points

We set out below an update on internal control points raised in prior periods.

### 3. Reconciliation of internal pension system and payroll

#### Description of deficiency

There is no reconciliation performed between the payroll data provided by the Pension Fund to the Pensions Shared Service, who input the data into Altair (the Pensions system), and the final report within Altair. This final report is provided back to the Pension Fund and used as a basis for disclosing membership data numbers into the Pension Fund's financial statements.

#### Potential effects

The membership numbers disclosed within the Pension Fund's financial statements may be incorrectly recorded.

#### Recommendation

The Pension Fund should implement a process which ensures the accounting team reconciles the payroll data provided to Pensions Shared Service to the data within Altair and notes any discrepancies to be investigated. This will ensure that the data from Altair that is used to populate the membership disclosure in the accounts is accurate.

#### Management response

Management is aware that the reconciliation between their internal pension system and their payroll should occur and are planning to implement this when the payroll system is modified in 2025/26.

## Appendix B: Draft management representation letter

Forvis Mazars  
30 Old Bailey  
London  
EC4M 7AU  
[Date]

Dear Suresh Patel,

### **London Borough of Camden Pension Fund - Audit for Year Ended 31 March 2025**

This representation letter is provided in connection with your audit of the financial statements of London Borough of Camden Pension Fund ('the Fund') for the year ended 31 March 2025 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25 (the Code), and applicable law.

I confirm that the following representations are made on the basis of enquiries of management and staff with relevant knowledge and experience (and, where appropriate, inspection of supporting documentation) sufficient to satisfy ourselves that I can properly make each of the following representations to you.

#### **My responsibility for the financial statements and accounting information**

I believe that I have fulfilled my responsibilities for the true and fair presentation and preparation of the financial statements in accordance with the Code, as amended by the Code and applicable law.

#### **My responsibility to provide and disclose relevant information**

I have provided you with:

- access to all information of which I am aware that is relevant to the preparation of the financial statements such as records, documentation and other material;
- additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to individuals within the Fund you determined it was necessary to contact in order to obtain audit evidence.

I confirm as interim s151 officer at I have taken all the necessary steps to make me aware of any relevant audit information and to establish that you, as auditors, are aware of this information. As far as I am aware there is no relevant audit information of which you, as auditors, are unaware.

# Appendix B: Draft management representation letter

I confirm that there is no information provided to you as part of the audit that I consider legally privileged.

## **Accounting records**

I confirm that all transactions that have a material effect on the financial statements have been recorded in the accounting records and are reflected in the financial statements. All other records and related information, including minutes of all relevant committee meetings, have been made available to you.

## **Accounting policies**

I confirm that I have reviewed the accounting policies applied during the year in accordance with International Accounting Standard 8 and consider these policies to faithfully represent the effects of transactions, other events or conditions on the Fund's financial position, financial performance and cash flows.

## **Accounting estimates, including those measured at fair value**

I confirm that the methods, significant assumptions and the data used by the Fund in making the accounting estimates, including those measured at fair value, are appropriate to achieve recognition, measurement or disclosure that is in accordance with the applicable financial reporting framework.

## **Contingencies**

There are no material contingent losses including pending or potential litigation that should be accrued where:

- information presently available indicates that it is probable that an asset has been impaired or a liability had been incurred at the balance sheet date; and
- the amount of the loss can be reasonably estimated.

There are no material contingent losses that should be disclosed where, although either or both the conditions specified above are not met, there is a reasonable possibility that a loss, or a loss greater than that accrued, may have been incurred at the balance sheet date.

There are no contingent gains which should be disclosed.

All material matters, including unasserted claims, that may result in litigation against the Fund have been brought to your attention. All known actual or possible litigation and claims whose effects should be considered when preparing the financial statements have been disclosed to you and accounted for and disclosed in accordance with the Code, as amended by the Code and applicable law.

# Appendix B: Draft management representation letter

## **Laws and regulations**

I confirm that I have disclosed to you all those events of which I am aware which involve known or suspected non-compliance with laws and regulations, together with the actual or contingent consequences which may arise therefrom.

## **Fraud and error**

I acknowledge my responsibility as s151 officer for the design, implementation and maintenance of internal control to prevent and detect fraud and error and I believe I have appropriately fulfilled those responsibilities.

I have disclosed to you:

- all the results of my assessment of the risk that the financial statements may be materially misstated as a result of fraud;
- all knowledge of fraud or suspected fraud affecting the Fund involving:
  - management and those charged with governance;
  - employees who have significant roles in internal control; and
  - others where fraud could have a material effect on the financial statements.

I have disclosed to you all information in relation to any allegations of fraud, or suspected fraud, affecting the Fund's financial statements communicated by employees, former employees, analysts, regulators or others.

## **Related party transactions**

I confirm that all related party relationships, transactions and balances, have been appropriately accounted for and disclosed in accordance with the requirements of the Code, as amended by the Code and applicable law.

I have disclosed to you the identity of the Fund's related parties and all related party relationships and transactions of which I am aware.

## **Impairment review**

To the best of my knowledge, there is nothing to indicate that there is a permanent reduction in the recoverable amount of the Fund's assets below their carrying value at the balance sheet date. An impairment review is therefore not considered necessary.

## Appendix B: Draft management representation letter

### **Charges on assets**

All the Fund's assets are free from any charges exercisable by third parties except as disclosed within the financial statements.

### **Future commitments**

The Fund has no plans, intentions or commitments that may materially affect the carrying value or classification of assets and liabilities or give rise to additional liabilities.

### **Subsequent events**

I confirm all events subsequent to the date of the financial statements and for which the Code, as amended by the Code and applicable law, require adjustment or disclosure have been adjusted or disclosed. Should further material events occur after the date of this letter which may necessitate revision of the figures included in the financial statements or inclusion of a note thereto, I will advise you accordingly.

### **Going concern**

To the best of my knowledge there is nothing to indicate that the Fund will not continue as a going concern in the foreseeable future. The period to which I have paid particular attention in assessing the appropriateness of the going concern basis is not less than twelve months from the date of approval of the accounts.

### **Unadjusted misstatements**

We confirm that all arising misstatements were corrected and there were no unadjusted misstatements in the year.

Yours faithfully,

Daniel Omisore

Director of Finance and Interim s151 officer

# Appendix C: Draft audit report

## Independent auditor's report to the Members of London Borough of Camden

### Report on the audit of the financial statements

#### Opinion on the financial statements of London Borough of Camden Pension Fund

We have audited the financial statements of London Borough of Camden Pension Fund ('the Pension Fund') for year ended 31 March 2025, which comprise the Fund Account, the Net Assets Statement, and notes to the financial statements, including a summary of material accounting policy information.

The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25.

In our opinion the financial statements:

- give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2025, and the amount and disposition of the Pension Fund's assets and liabilities as at 31 March 2025; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25.

#### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the "Auditor's responsibilities for the audit of the financial statements" section of our report. We are independent of the Council, as administering authority for the Pension Fund, in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Director of Finance's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, and taking into account the requirements of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Pension Fund's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Director of Finance with respect to going concern are described in the relevant sections of this report.

## Appendix C: Draft audit report

### Other information

The other information comprises the information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. The Director of Finance is responsible for the other information. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements, or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

### Responsibilities of the Director of Finance for the financial statements

As explained more fully in the Statement of the Director of Finance's Responsibilities, the Director of Finance is responsible for the preparation of the Statement of Accounts, which includes the Pension Fund's financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25, and for being satisfied that they give a true and fair view. The Director of Finance is also responsible for such internal control as the Director of Finance determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

The Director of Finance is required to comply with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25 and prepare the financial statements on a going concern basis, unless the Council is informed of the intention for dissolution of the Pension Fund without transfer of services or function to another entity. The Director of Finance is responsible for assessing each year whether or not it is appropriate for the Pension Fund to prepare its accounts on the going concern basis and disclosing, as applicable, matters related to going concern.

## Appendix C: Draft audit report

### **Auditor's responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the Pension Fund's 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 our 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.

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

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. Based on our understanding of the Pension Fund, we identified that the principal risks of non-compliance with laws and regulations related to the Public Service Pensions Act 2013, the Local Government Pension Scheme Regulations 2013 (as amended) and the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016, and we considered the extent to which non-compliance might have a material effect on the financial statements.

To help us identify instances of non-compliance with these laws and regulations, and in identifying and assessing the risks of material misstatement in respect to non-compliance, our procedures included, but were not limited to:

- gaining an understanding of the legal and regulatory framework applicable to the Pension Fund, the environment in which it operates, and the structure of the Pension Fund, and considering the risk of acts by the Pension Fund which were contrary to the applicable laws and regulations, including fraud;
- inquiring with management and the Audit and Corporate Governance Committee, as to whether the Pension Fund is in compliance with laws and regulations, and discussing their policies and procedures regarding compliance with laws and regulations;
- inspecting correspondence, if any, with relevant licensing or regulatory authorities;
- reviewing relevant meeting minutes in the year;
- communicating identified laws and regulations throughout our engagement team and remaining alert to any indications of non-compliance throughout our audit; and
- considering the risk of acts by the Pension Fund which were contrary to applicable laws and regulations, including fraud.

## Appendix C: Draft audit report

Our audit procedures in relation to fraud included but were not limited to:

- making enquiries of management and the Audit and Corporate Governance Committee on whether they had knowledge of any actual, suspected or alleged fraud;
- gaining an understanding of the internal controls established to mitigate risks related to fraud;
- discussing amongst the engagement team the risks of fraud; and
- addressing the risks of fraud through management override of controls by performing journal entry testing.

There are inherent limitations in the audit procedures described above and the primary responsibility for the prevention and detection of irregularities including fraud rests with management and the Audit and Corporate Governance Committee. As with any audit, there remained a risk of non-detection of irregularities, as these may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal controls.

We are also required to conclude on whether the Director of Finance' use of the going concern basis of accounting in the preparation of the financial statements is appropriate. We performed our work in accordance with Practice Note 10: Audit of financial statement and regularity of public sector bodies in the United Kingdom, and Supplementary Guidance Note 01, issued by the National Audit Office in November 2024.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditor's report.

### Use of the audit report

This report is made solely to the members of London Borough of Camden Council, as a body and as administering authority for the London Borough of Camden Pension Fund, in accordance with part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the members of the Council those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the members of the Council, as a body, for our audit work, for this report, or for the opinions we have formed.

Suresh Patel,

Key Audit Partner, For and on behalf of Forvis Mazars LLP  
30 Old Bailey, London, EC4M 7AU

[Date]

# Appendix D: Draft consistency report

## Independent auditor's statement to the members of London Borough of Camden on the pension fund financial statements included within the London Borough of Camden Pension Fund annual report

### Report on the financial statements

We have examined the Pension Fund financial statements for the year ended 31 March 2025 included within the London Borough of Camden Pension Fund annual report, which comprise the Fund Account, the Net Assets Statement and the notes to the financial statements, including material accounting policy information.

### Opinion

In our opinion, the Pension Fund financial statements are consistent with the audited financial statements of London Borough of Camden for the year ended 31 March 2025 and comply with applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25.

### Respective responsibilities of the Director of Finance and the auditor

As explained more fully in the Statement of the Director of Finance's Responsibilities, the Director of Finance is responsible for the preparation of the Pension Fund's financial statements in accordance with applicable United Kingdom law.

Our responsibility is to report to the Members of London Borough of Camden as a body, whether the Pension Fund financial statements within the Pension Fund annual report are consistent with the financial statements of London Borough of Camden.

We conducted our work in accordance with Auditor Guidance Note 07 – Auditor Reporting, issued by the National Audit Office. Our report on the Pension Fund financial statements contained within the audited financial statements of London Borough of Camden describes the basis of our opinions on the financial statements.

# Appendix D: Draft consistency report

## Use of this auditor's statement

This report is made solely to the members of London Borough of Camden, as a body and as administering authority for the Camden Pension Fund, in accordance with Part 5 paragraph 20(5) of the Local Audit and Accountability Act 2014. Our work has been undertaken so that we might state to the members of London Borough of Camden those matters we are required to state to them and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than London Borough of Camden and London Borough of Camden's members as a body, for our audit work, for this statement, or for the opinions we have formed.

[Signature]

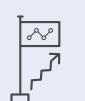
Suresh Patel, Key Audit Partner

For and on behalf of Forvis Mazars LLP (Local Auditor)

30 Old Bailey, London, EC4M 7AU

[Date]

# Appendix E: Other communications

Other communication	Response
 <b>Compliance with Laws and Regulations</b>	<p>We will obtain written representations from management that all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements have been disclosed.</p>
 <b>External confirmations</b>	<p>We did not experience any issues with respect to obtaining external confirmations.</p>
 <b>Related parties</b>	<p>We did not identify any significant matters relating to the audit of related parties.</p> <p>We will obtain written representations from management confirming that:</p> <ol style="list-style-type: none"> <li data-bbox="455 707 2490 735">they have disclosed to us the identity of related parties and all the related party relationships and transactions of which they are aware; and</li> <li data-bbox="455 745 2490 803">they have appropriately accounted for and disclosed such relationships and transactions in accordance with the requirements of the applicable financial reporting framework.</li> </ol>
 <b>Going Concern</b>	<p>We have not identified any evidence to cause us to disagree with the Director of Finance that the Pension Fund will be a going concern, and therefore we have not identified any evidence to cause us to consider that the use of the going concern assumption in preparation of the financial statements is not appropriate.</p> <p>We will obtain written representations from management, confirming that all relevant information covering a period of at least 12 months from the date of approval of the financial statements has been taken into account in assessing the appropriateness of the going concern basis of preparation of the financial statements.</p>
 <b>Subsequent events</b>	<p>We are required to obtain evidence about whether events occurring between the date of the financial statements and the date of the auditor's report that require adjustment of, or disclosure in, the financial statements are appropriately reflected in those financial statements in accordance with the applicable financial reporting framework.</p> <p>We will obtain written representations from management that all events occurring subsequent to the date of the financial statements and for which the applicable financial reporting framework requires adjustment or disclosure have been adjusted or disclosed.</p>

# Appendix E: Other communications

Other communication	Response
 <b>Matters related to fraud</b>	<p>Our audit was designed to obtain reasonable assurance whether the financial statements as a whole are free from material misstatement due to fraud. Please refer to the section titled 'Fraud considerations' for our fraud considerations and conclusion.</p> <p>We will obtain written representations from management and, where appropriate, the Audit and Corporate Governance Committee, confirming that</p> <ol style="list-style-type: none"> <li>they acknowledge their responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud;</li> <li>they have disclosed to the auditor the results of management's assessment of the risk that the financial statements may be materially misstated as a result of fraud;</li> <li>they have disclosed to the auditor their knowledge of fraud or suspected fraud affecting the entity involving:             <ol style="list-style-type: none"> <li>management;</li> <li>employees who have significant roles in internal control; or</li> <li>others where the fraud could have a material effect on the financial statements; and</li> </ol> </li> <li>they have disclosed to the auditor their knowledge of any allegations of fraud, or suspected fraud, affecting the entity's financial statements communicated by employees, former employees, analysts, regulators or others.</li> </ol>
 <b>System of Quality Management</b>	<p>To address the requirements of ISQM (UK) 1, our firm's System of Quality Management team completes, as part of an ongoing and iterative process, a number of key steps to assess and conclude on our firm's System of Quality Management, including:</p> <ul style="list-style-type: none"> <li>Ensuring there is an appropriate assignment of responsibilities under ISQM (UK) 1 and across Leadership</li> <li>Establishing and reviewing quality objectives each year, ensuring ISQM (UK) 1 objectives align with our firm's strategies and priorities</li> <li>Identifying, reviewing, and updating quality risks each quarter, taking into consideration a number of input sources (such as FRC / ICAEW review findings, internal monitoring findings, findings from our firm's root cause analysis and remediation functions, etc.)</li> <li>Identifying, designing, and implementing responses as part of the process to strengthen our firm's internal control environment and overall quality</li> <li>Evaluating responses and remediating control gaps or deficiencies</li> </ul> <p>We perform an evaluation of our system of quality management on an annual basis. Our latest evaluation was performed as of 31 August 2024. Details of that assessment and our conclusion are set out in our 2023/2024 Transparency Report, which is available on our website <a href="#">here</a>.</p>

# Contact

## Forvis Mazars

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