



Food Standards Scotland

Planning report to the Audit and Risk Committee on the 2024/25 audit –
Issued on 21st February 2025 for the meeting on 10th March 2025

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1. Introduction

The key messages in this report

Audit quality is our number one priority. We plan our audit to focus on audit quality and have set the following audit quality objectives for this audit:

- A robust challenge of the key judgements taken in the preparation of the financial statements.
- A strong understanding of your internal control environment.
- A well planned and delivered audit that raises findings early with those charged with governance.

Introduction

I have pleasure in presenting our planning report to the Audit and Risk Committee (“the Committee”) of Food Standards Scotland (“FSS”) for the 2024/25 audit. I would like to draw your attention to the key messages of this paper.

Audit approach

Materiality

The concept of materiality is fundamental to the audit. It is applied throughout the audit to evaluate the effect of identified misstatements on the audit and of uncorrected misstatements, if any, on the financial statements.

We have determined preliminary materiality of £572k (2023/24: £537k) for the 2024/25 audit. This represents 2% (2023/24: 2%) of expenditure). Based on the activities of FSS we selected expenditure as the most appropriate benchmark.

Performance materiality has been set at £429k (2023/24: £402k), representing 75% (2023/24: 75%). We will report misstatements found in excess of £28.6k, or those below that threshold if we consider them qualitatively material.

Audit risks

We plan our audit of the financial statements to respond to the risks of material misstatement to transactions and balances and irregular transactions. Based on our initial risk assessment we have identified following significant risks ([page 7](#)):

- Operating within expenditure resource limits; and
- Management override of controls.

We will update the audit committee on any changes.

Area of Audit Focus

We have identified the following areas of audit focus:

- Change in finance system; and
- London Pension Fund Authority.

Our assessment of these areas of focus is summarised on [page 10](#).

Audit timetable

Out timetable is summarised on [page 18](#), we understand the financial statements are to be approved in October 2025.

Controls

We do not plan to rely on any controls as part of our audit.

Wider Scope and Best Value requirements

Reflecting the fact that public money is involved, public audit is planned and undertaken from a wider perspective than in the private sector. The wider-scope audit specified by the Code of Audit Practice broadens the audit of the accounts to include consideration of additional aspects or risks.

In carrying out our risk assessment, we have considered the arrangements in place for the wider-scope areas ([page 11](#)). As part of this work, we will consider the arrangements in place to secure Best Value (BV).

Team

Following the retirement of Pat Kenny, Sarah McGavin will be the audit engagement lead.

Sarah McGavin
Director

2. Our audit explained

What we consider when we plan the audit

Responsibilities of management

We expect management and those charged with governance to recognise the importance of a strong control environment and take proactive steps to deal with deficiencies identified on a timely basis.

Auditing standards require us to only accept or continue with an audit engagement when the preconditions for an audit are present. These preconditions include obtaining the agreement of management and those charged with governance that they acknowledge and understand their responsibilities for, amongst other things, internal control as is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Responsibilities of auditors

Our responsibilities are set out on [page 22](#).

Responsibilities of the Audit and Risk Committee

As explained further in the Responsibilities of the Audit and Risk Committee slide on [page 17](#), the Audit and Risk Committee is responsible for:

- Reviewing internal financial controls and internal control and risk management systems (unless expressly addressed by a separate risk committee or by the Board itself).
- Monitoring and reviewing the effectiveness of the internal audit function.
- Reporting in the annual report on the annual review of the effectiveness of risk management and internal control systems.
- Explaining what actions have been or are being taken to remedy any significant failings or weaknesses.

3.1 Scope of work and approach

We have the following key areas of responsibility under the Code of Audit Practice

Opinion on Financial statements

We will conduct our audit in accordance with International Standards on Auditing (UK) (“ISA (UK)”) and the Code of Audit Practice issued by Audit Scotland. FSS will prepare its accounts in accordance with the Applicable law and UK adopted international accounting standards, as interpreted and adapted by the 2024/25 Government Financial Reporting Manual (FRoM) and the Public Finance and Accountability (Scotland) Act 2000, and directions made thereunder by the Scottish Ministers.

Reporting on other requirements

Our responsibilities also include:

- an opinion on the regularity of expenditure and income;
- an opinion on the audited parts of the Remuneration and Staff Report;
- under the Code of Audit Practice to read the information included in the Performance Report and the Governance Statement, and opine whether they are consistent with the financial statements; and
- In accordance with ISAs (UK) to read the other information accompanying the financial statements and report by exception any material misstatements we identify.

Our reporting will be addressed to FSS, the Auditor General for Scotland, and the Scottish Parliament.

Wider-scope requirements, including considering and reporting on Best Value arrangements

Reflecting the fact that public money is involved, public audit is planned and undertaken from a wider perspective than in the private sector. The wider-scope audit specified by the Code of Audit Practice broadens the audit of the accounts to include consideration of additional aspects or risks in respect of:

- financial management;
- financial sustainability;
- vision, leadership and governance; and
- use of resources to improve outcomes.

As part of this wider-scope audit work, we also are required to consider whether there are appropriate organisation arrangements in place to secure Best Value in public services. Our approach to our wider-scope audit work is detailed on [page 11](#).

Other reporting requirements

Anti-money laundering - We are required to ensure that arrangements are in place to be informed of any suspected instances of money laundering at audited bodies. Any such instances will be advised to Audit Scotland.

Fraud returns - We are required to prepare and submit fraud returns to Audit Scotland for all frauds at audited bodies:

- Involving the misappropriation or theft of assets or cash which are facilitated by weaknesses in internal control.
- Over £5,000.

3.2 Scope of work and approach (continued)

Our approach

Liaison with internal audit and local counter fraud

The Auditing Standards Board's version of ISA (UK) 610 "Using the work of internal auditors" prohibits use of internal audit to provide "direct assistance" to the audit. Our approach to the use of the work of Internal Audit has been designed to be compatible with these requirements.

We will review their reports and where they have identified specific material deficiencies in the control environment, consider adjusting our testing so that the audit risk is covered by our work.

Impact of your control environment on our audit

We expect management and those charged with governance to recognise the importance of a strong control environment and take proactive steps to deal with deficiencies identified on a timely basis.

Reliance on controls: Our risk assessment procedures will include obtaining an understanding of controls considered to be 'relevant to the audit'. This involves evaluating the design of the controls and determining whether they have been implemented ("D&I"), [page 20](#) summarises the controls we plan to examine. We do not take a controls reliance approach to our audit.

Performance materiality: We set performance materiality as a percentage of materiality to reduce the probability that, in aggregate, uncorrected and undetected misstatements exceed materiality. We determine performance materiality with reference to factors such as the quality of the control environment and the historical error rate.

Given the positive findings from our previous audit, we have maintained the same performance materiality benchmark for the current year.

IT environment

A quality IT environment underpins a good control environment, particularly as IT controls are configurable and often preventative in nature. In the prior year our IT specialists concluded that FSS's IT environment applicable to financial processes is simple in nature and none of our significant audit risk areas are impacted by IT systems.

However, from October 2024 a new finance system (Oracle Fusion) has been implemented giving rise to unique challenges, which have the potential to impact the control environment and financial reporting processes. We are currently performing procedures to understand the impact and determine our audit procedures. For more detail please refer to [page 10](#).








Promoting high quality reporting to stakeholders

We view the audit role as going beyond reactively checking compliance with requirements: we seek to provide advice on evolving good practice to promote high quality reporting.

We use and continually update International Financial Reporting Standards ("IFRS") disclosure checklists in conjunction with the requirements of the FReM to support FSS in preparing high quality drafts of the Annual Report and Accounts, which we would recommend FSS complete during drafting.

4.1 Significant risks

Significant risk dashboard

Risk	Fraud risk	Planned approach to controls	Level of management judgement	Management paper expected	Page no.
Management override of controls					8
Operating within expenditure resource limits					9



Level of management judgement

Significant management judgement



A degree of management judgement



Limited management judgement



Controls approach adopted

Assess design & implementation

4.2 Significant risks (continued)

Management override of controls

Risk identified

In accordance with ISA (UK) 240 management override is a significant risk. This risk area includes the potential for management to use their judgement to influence the Annual Report and Accounts as well as the potential to override FSS's controls for specific transactions.

The key judgment in the Annual Report and Accounts is that which we have selected to be the significant audit risk – operating within expenditure resource limits. This is inherently the area in which management has the potential to use their judgment to influence the Annual Report and Accounts.

Our response

In considering the risk of management override, we plan to perform the following audit procedures that directly address this risk:

- We will gain an understanding of the overall control environment;
 - We will test the design and implementation of controls relating to journals;
 - We will make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments;
 - We will test the appropriateness of journals and adjustments made in the preparation of the Annual Report and Accounts. We will use Spotlight data analytics tools to select journals for testing, based upon identification of items of potential audit interest;
 - We will review accounting estimates for biases that could result in material misstatements due to fraud and perform testing and stand back assessments on key accounting estimates as discussed above;
 - We will obtain an understanding of the business rationale of significant transactions that we become aware of that are outside of the normal course of business for the entity, or that otherwise appear to be unusual, given our understanding of the entity and its environment.
-

4.3 Significant risks (continued)

Operating within the expenditure resource limits

Risk identified In accordance with Practice Note 10 (Audit of Annual Accounts of public sector bodies in the United Kingdom), in addition to the presumed risk of fraud in revenue recognition set out in ISA (UK) 240, auditors of public sector bodies should also consider the risk of fraud and error on expenditure. This is on basis that most public bodies are net spending bodies, therefore the risk of material misstatement due to fraud related expenditure may be greater than the risk of material misstatement due to fraud related to revenue recognition.

We consider this fraud risk to be focused on how management operate within the expenditure resource limits set by the Scottish Government. The risk is that FSS could materially misstate expenditure in relation to year-end transactions, in an attempt to align with its tolerance target or achieve a breakeven position.

The significant risk is therefore pinpointed to the cut off and completeness of accruals and the existence of prepayments made by management at the year end and invoices processed around the year end as this is the area where there is scope to manipulate the final results. Given the financial pressures across the whole of the public sector, there is an inherent fraud risk associated with the recording of accruals and prepayments around year end.

Our response We will evaluate the results of our audit testing in the context of the achievement of the limits set by the Scottish Government. Our work in this area will include the following:

- Evaluating the design and implementation of controls around monthly monitoring of financial performance and the estimated accruals and prepayments made at the year-end;
- Obtain independent confirmation of the resource limits allocated to FSS by the Scottish Government;
- Perform focused testing of a sample of accruals and prepayments made at the year-end; and
- Performing focused cut-off testing of a sample of invoices received and paid around the year-end.

5. Other areas of audit focus

We have identified the below areas of audit interest, although do not consider these to be significant risks

Risk identified Implementation of new finance system

Summary A new finance system (Oracle Fusion) has been implemented by the Scottish Government effective from October 2024. This has replaced the SEAS system which was in effect until October 2024.

Per our discussions with management and the finance team, we have identified some initial transitional challenges which impact both FSS's internal accounting processes and our audit procedures. From initial discussions we have established that there will be changes to the operation of certain controls which we will need to perform additional procedures over. We are currently in the process of understanding the full impact of this transition on our audit and engaging with our internal IT specialists.

Risk identified Disclosure of defined benefit pension balances

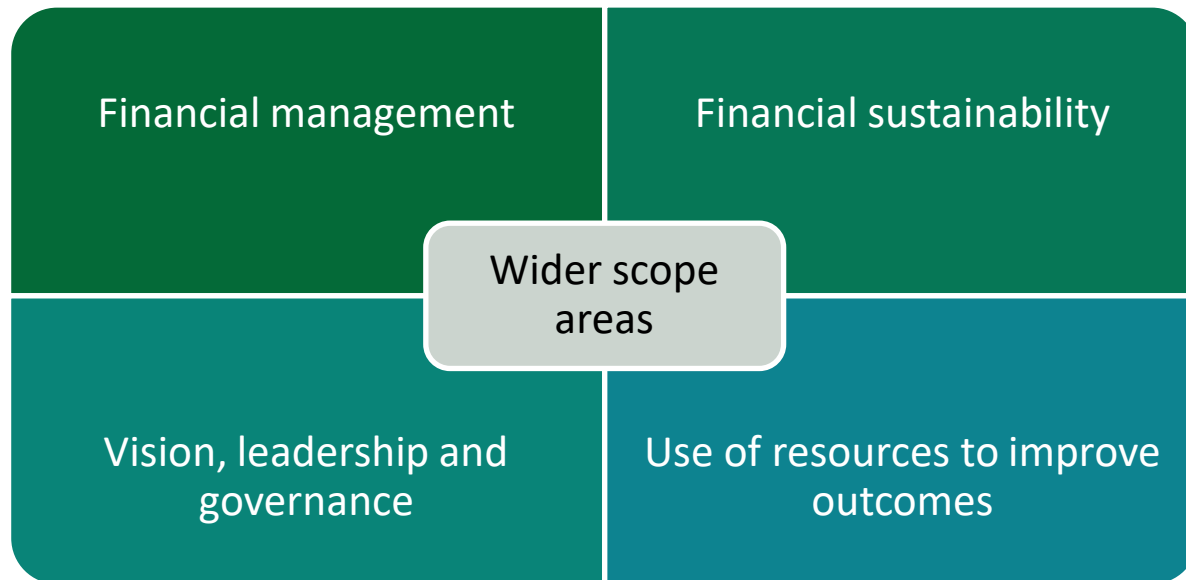
Summary FSS participates in the London Pension Fund Authority Pension Fund and has specific disclosures in the financial statements relating to this. As defined benefit pension schemes are complex area of accounting, FSS engages a third party actuary to provide a report on these balances. In the prior year there was a triennial valuation of the pension fund assets which resulted in an asset cap being applied to FSS.

From discussions with FSS management the process will be similar this year, and as such we have engaged our own internal specialists to perform procedures on the pension balances.

6.1 Wider scope requirements

Overview

Reflecting the fact that public money is involved, public audit is planned and undertaken from a wider perspective than in the private sector. The wider-scope audit specified by the Code of Audit Practice broadens the audit of the accounts to include consideration of additional aspects or risks in the following areas.



The Scottish Public Finance Manual (SPFM) explains that Accountable Officers have a specific responsibility to ensure that arrangements have been made to secure Best Value. Ministerial guidance to Accountable Officers for public bodies sets out their duty to ensure that arrangements are in place to secure Best Value in public services. As part of our wider scope audit work, we will consider whether there are organisational arrangements in place in this regard.

As part of our risk assessment, we have considered the arrangements in place for the wider-scope areas and have summarised the significant risks and our planned response on the following pages.

6.2 Wider scope requirements (continued)

Risk Assessment

Area	Risks identified	Planned audit response
Financial Management	<p>FSS continues to have effective budget setting and monitoring arrangements in place, with the final outturn of 2023/24 being a surplus of £0.3m.</p> <p>As of May 2024 a new governance structure has been in place following a capability review across the organisation. This has formalised the reporting process, as well as the governance roles across the senior management team. A new corporate plan has also been implemented covering the period from 2024 to 2026. A new Head of Finance has also taken up post in 2024/25, however the remainder of the finance roles at FSS remain consistent.</p> <p>The senior management team is experienced and has remained consistent from 2023/24. We have therefore not identified a significant risk in relation to financial management.</p>	<p>We will monitor the financial management and budget setting & monitoring arrangements at FSS over the course of the year with the new structure in place.</p>

6.3 Wider scope requirements (continued)

Risk Assessment

Area	Risks identified	Planned audit response
Financial Sustainability	<p>The 2024/25 budget is “over allocated”, i.e. the budget is not balanced. In line with previous years and across the Central Government sector, there are significant pressures facing organisations due to limited flexibility in expenditure and a challenging operating environment resulting in cost increases.</p> <p>78% of the 2023/24 expenditure relates to staff costs, with challenges arising through the announcement of Employer National Insurance increases and uncertainty over how this will be funded.</p> <p>We have therefore identified a significant risk relating to financial sustainability in the medium to long term.</p>	<p>We will continue to assess the development of the 2025/26 budget and how that links to the Medium Term Financial Plan and the Strategic Plan. We will also assess FSS’ response to addressing budget gaps in future years.</p>
Vision, Leadership and Governance	<p>FSS has implemented an organisational review in the senior management team in 2024/25 as part of ongoing operational requirements. A new corporate plan covering the period from 2024-26 has been implemented, underlying the strategic plan covering 2021-26.</p> <p>FSS also has a detailed performance management plan in place which resulted in on track performance in 2023/24.</p> <p>Through our planning procedures, we have not identified any significant risks in relation to vision, leadership and governance.</p>	<p>We shall continue to monitor the governance arrangements in place at FSS following the new organisational arrangements.</p>

6.4 Wider scope requirements (continued)

Risk Assessment

Area	Risks identified	Planned audit response
<p>Use of Resources to Improve Outcomes</p>	<p>FSS has implemented its Strategic Plan for 2021-2026. While FSS has performed well in 2023/24 despite the financial pressures, there is a risk that should additional funding not be received in future years, FSS may be unable to deliver on all of its objectives.</p> <p>A revised Corporate Plan has been produced covering the period from 2024 to 2026, outlining the delivery of strategic outcomes and transformation. This will be assessed as part of the 2024/25 audit.</p> <p>We have not identified a significant risk in relation to the Use of Resources to Improve Outcomes, instead the significant risk is pinpointed to Financial Sustainability as outlined on page 13.</p>	<p>Linked to the financial sustainability work, we will continue to assess the development of the 2025/26 budget and how that links to the MTFP and the Strategic Plan.</p> <p>We will continue to assess how the new Corporate Plan links to the Strategic Plan and how the FSS is reporting against this to demonstrate how it is using resources to improve outcomes over the course of 2024/25.</p> <p>We shall continue to monitor the new directorate structure and scrutiny placed upon the use of resources during 2024/25 and subsequent future plans.</p>

7. Purpose of our report and responsibility statement

Our report is designed to help you meet your governance duties

What we report

Our report is designed to establish our respective responsibilities in relation to the Annual Report and Accounts audit, to agree our audit plan and to take the opportunity to ask you questions at the planning stage of our audit. Our report includes:

- Our audit plan, including key audit judgements and the planned scope; and
- Key regulatory and corporate governance updates, relevant to you.

Use of this report

This report has been prepared for FSS, as a body, and we therefore accept responsibility to you alone for its contents. We accept no duty, responsibility or liability to any other parties, since this report has not been prepared, and is not intended, for any other purpose. Except where required by law or regulation, it should not be made available to any other parties without our prior written consent.

We welcome the opportunity to discuss our report with you and receive your feedback.

What we don't report

As you will be aware, our audit is not designed to identify all matters that may be relevant to FSS.

Also, there will be further information you need to discharge your governance responsibilities, such as matters reported on by management or by other specialist advisers.

Finally, the views on internal controls and business risk assessment in our final report should not be taken as comprehensive or as an opinion on effectiveness since they will be based solely on the audit procedures performed in the audit of the financial statements and the other procedures performed in fulfilling our audit plan.

Other relevant communications

We will update you if there are any significant changes to the audit plan.

Deloitte LLP
Aberdeen | 21 February 2025

Appendices



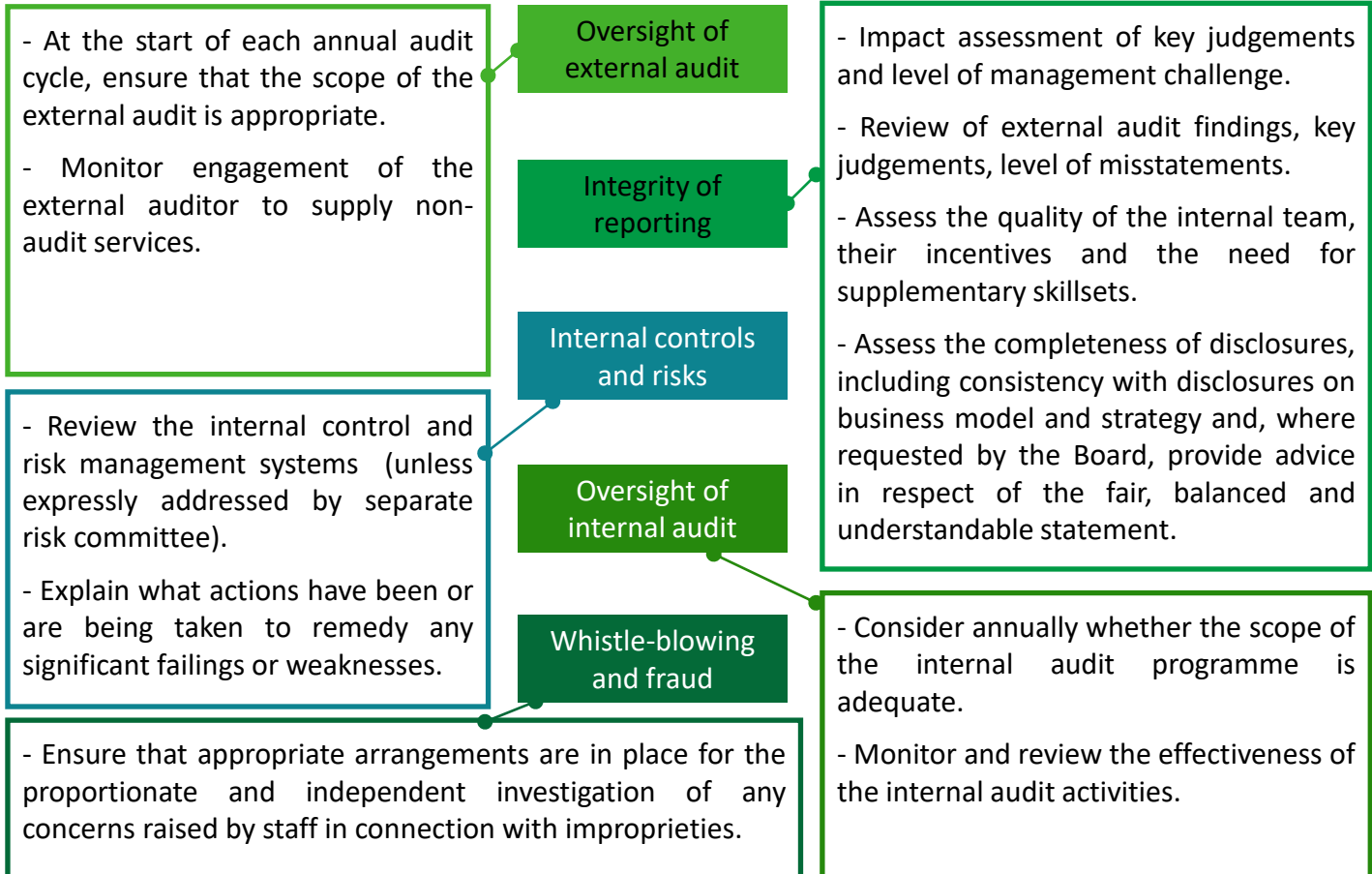
8. Responsibilities of the Audit and Risk Committee

Helping you fulfil your responsibilities

Why do we interact with the Audit and Risk Committee?



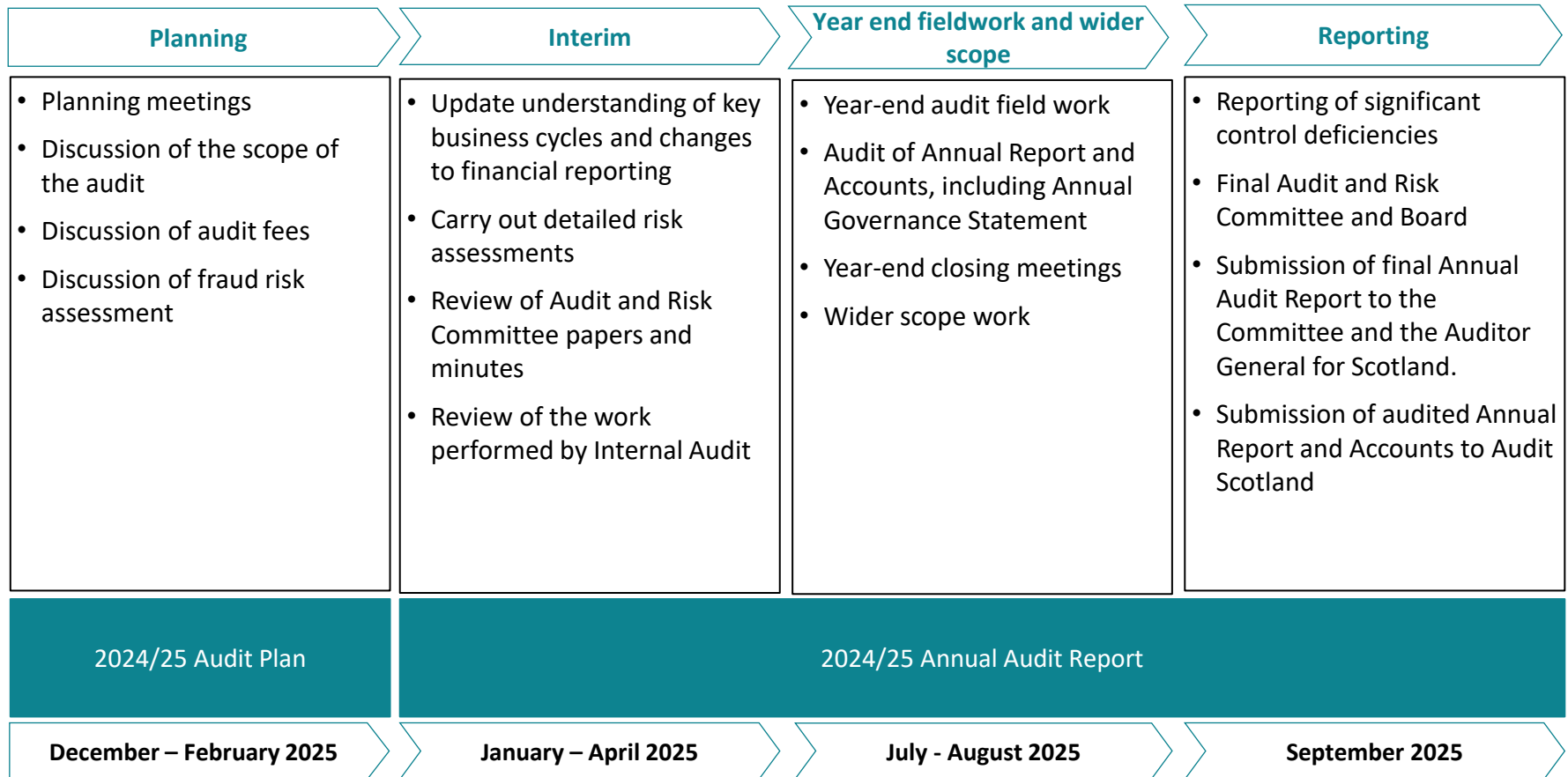
As a result of regulatory change in recent years, the role of the Audit and Risk Committee has significantly expanded. We set out here a summary of the core areas of Audit and Risk Committee responsibility to provide a reference in respect of these broader responsibilities and highlight throughout the document where there is key information which helps the Audit and Risk Committee in fulfilling its remit.



9.1 Continuous communication and reporting

Planned timing of the audit

As the audit plan is executed throughout the year, the results will be analysed continuously, and conclusions (preliminary and otherwise) will be drawn. The following sets out the expected timing of our reporting to and communication with you.



Ongoing communication and feedback

9.2 Continuous communication and reporting (continued)

Our key areas of responsibility under the Code of Audit Practice

Auditors activity	Planned output	Proposed reporting timeline to the Committee	Audit Scotland/ statutory deadline
Audit of Annual Report and Accounts	Annual Audit Plan	10 March 2025	31 March 2025
	Independent Auditor's Report	03 September 2025	31 October 2025
	Annual Audit Report	03 September 2025	31 October 2025
Wider-scope areas	Annual Audit Plan	10 March 2025	31 March 2025
	Annual Audit Report	03 September 2025	31 October 2025

10. Your control environment

Design and Implementation of controls testing

The following have been identified as the key controls within FSS which will be subject to D&I testing. We will assess the effectiveness of the design of controls and evaluate whether controls have been implemented as expected. Our testing will combine enquiry of key staff and walkthroughs to demonstrate the controls taking place.

Control	Risk Addressed	Expected Timing of Testing
1. Approval of journal entries	Management override of controls	Interim
2. Monthly monitoring of financial performance & year end close process	Management override of controls; Operating within expenditure resource limits	Interim / Year-End
3. Year-end accruals	Operating within expenditure resource limits	Year-end
4. Balance sheet reconciliations	Operating within expenditure resource limits Management override of controls	Year-end
5. Monthly processing of payroll	Management override of controls	Interim / Year-end

11.1 Our approach to quality

Our commitment to audit quality

Audit quality is at the heart of everything we do and our system of quality management (SQM) supports our execution of quality audits.

ISQM (UK) 1 sets out a firm’s responsibilities to design, implement and operate a system of quality management for audits, reviews of financial statements, and other assurance or related services engagements.

The effective ongoing operation of ISQM (UK) 1 has been and remains a key element of Deloitte’s global audit and assurance quality strategy and of the UK firm.

Deloitte UK performed its second annual evaluation of its system of quality management as of 31 May 2024. This evaluation was conducted in accordance with ISQM (UK) 1 and we concluded our SQM provides the firm with reasonable assurance that the objectives of the SQM are being achieved as of 31 May 2024.

For further details surrounding the conclusion on the operational effectiveness of the firm’s SQM, including results of the monitoring activities performed, please refer to the disclosure within Appendix 5 of our publicly available [Transparency Report](#).



11.2 Our approach to quality (continued)

FRC 2023/24 Audit Quality Inspection and Supervision report

Audit quality shapes our vision of the business we want to be, driving our priorities and defining our successes.

In July 2024, the Financial Reporting Council (“FRC”) issued individual reports on each of the six largest firms, including Deloitte on Audit Quality Inspection and Supervision, providing a summary of the findings of its Audit Quality Review (“AQR”) team for the 2023/24 cycle of reviews. We value the observations raised by both the FRC Supervision teams and the ICAEW Quality Assurance Department (“QAD”), both in identifying areas for improvement and also the ongoing focus on sharing good practice to drive further and continuous improvement.

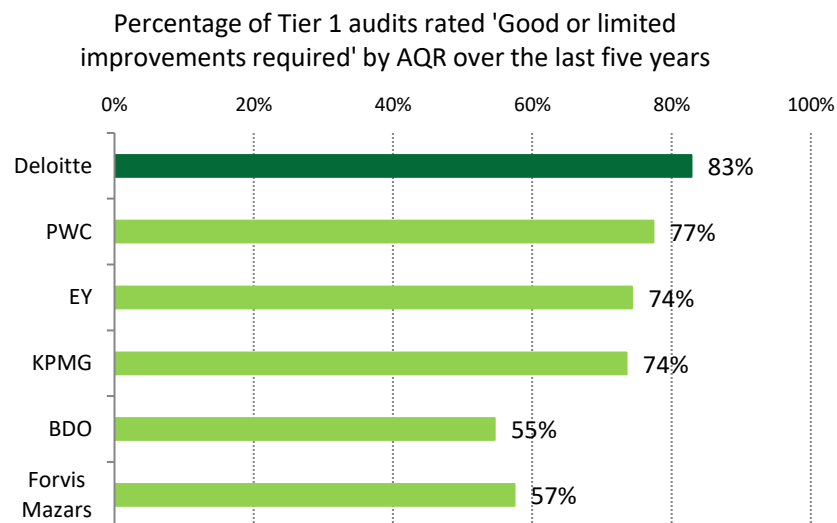
We are proud that the results of our FRC inspections show that 94% (2022/23: 82%) of our public interest audits were rated as ‘good’ or ‘limited improvements’ and that 100% (2023: 100%) of our audits reviewed by the ICAEW’s QAD were assessed as good or generally acceptable.

These sets of results reflect the continuous investment we are making and our commitment to acting in the public interest to deliver confidence and trust in business through our high quality audits. We recognise we still have more we want to do to ensure that we consistently meet the high standards we expect of ourselves. We take inspection, system of quality management (“SoQM”) and supervision focus areas seriously and place a significant level of resource and effort into understanding how we continually improve going forward.

We are pleased to see the positive impact of actions taken over the last 12 months to address findings raised by the FRC. We have a reduction in the number of key findings and none of the AQR findings from the 22/23 inspection cycle have recurred as key findings in this year’s cycle.

We welcome the breadth and depth of good practice points raised by the FRC and ICAEW, particularly in respect of effective group oversight, contract accounting and the challenge of management, where we have continued to take action to support the high-quality execution of audit work.

All the AQR public reports are available on the [FRC's website](#).



12. Prior year audit adjustments

Corrected misstatements

There were no corrected misstatements identified in relation to the prior year audit.

Uncorrected misstatements

There were no uncorrected misstatements identified in relation to prior year audit.

Disclosure misstatements

There were no disclosure misstatements identified in relation to prior year audit.

Other disclosure recommendations

There were no disclosure recommendations identified in relation to prior year audit.

We have considered the above in determining materiality and performance materiality for the current year 2024/25.

13.1 Our other responsibilities explained

Fraud responsibilities



Your Responsibilities:

The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance, including establishing and maintaining internal controls over the reliability of financial reporting, effectiveness and efficiency of operations and compliance with applicable laws and regulations.



Our responsibilities:

- We are required to obtain representations from your management regarding internal controls, assessment of risk and any known or suspected fraud or misstatement.
- As auditors, we obtain reasonable, but not absolute, assurance that the financial statements as a whole are free from material misstatement, whether caused by fraud or error.
- As set out in the significant risks section of this document, we have identified risks of material misstatement due to fraud in operating within expenditure resource limits and management override of controls.
- We will explain in our audit report how we considered the audit capable of detecting irregularities, including fraud. In doing so, we will describe the procedures we performed in understanding the legal and regulatory framework and assessing compliance with relevant laws and regulations.
- We will communicate to you any other matters related to fraud that are, in our judgment, relevant to your responsibilities. In doing so, we shall consider the matters, if any, regarding management's process for identifying and responding to the risks of fraud and our assessment of the risks of material misstatement due to fraud.



Fraud Characteristics:

- Misstatements in the financial statements can arise from either fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement of the financial statements is intentional or unintentional.
- Two types of intentional misstatements are relevant to us as auditors – misstatements resulting from fraudulent financial reporting and misstatements resulting from misappropriation of assets.

13.2 Our other responsibilities explained (continued)

Fraud responsibilities

We will make the following inquiries regarding fraud and non-compliance with laws and regulations:



Management and other personnel:

- Management's assessment of the risk that the financial statements may be materially misstated due to fraud, including the nature, extent and frequency of such assessments.
- Management's process for identifying and responding to risks of fraud.
- Management's communication, if any, to those charged with governance regarding its processes for identifying and responding to the risks of fraud.
- Management's communication, if any, to employees regarding its views on business practices and ethical behaviour.
- Whether management has knowledge of any actual, suspected or alleged fraud affecting the entity.
- We plan to involve management from outside the finance function in our inquiries, in particular the Chair of the Audit and Risk Committee.
- We will also make inquiries of personnel who are expected to deal with allegations of fraud raised by employees or other parties.



Internal audit

- Whether internal audit has knowledge of any actual, suspected or alleged fraud affecting the entity, and to obtain its views about the risks of fraud.



Those charged with governance

- How those charged with governance exercise oversight of management's processes for identifying and responding to the risks of fraud in the entity and the internal control that management has established to mitigate these risks.
- Whether those charged with governance have knowledge of any actual, suspected or alleged fraud affecting the entity.
- The views of those charged with governance on the most significant fraud risk factors affecting the entity, including those specific to the sector.

14. Independence and fees

As part of our obligations under International Standards on Auditing (UK), we are required to report to you on the matters listed below:

Independence confirmation We confirm the audit engagement team, and others in the firm as appropriate, Deloitte LLP and, where applicable, all Deloitte network firms are independent of FSS and will reconfirm our independence and objectivity to the Audit and Risk Committee for the year ending 31 March 2025 in our final report to the Audit and Risk Committee.

Fees The expected fee for 2024/25, as communicated by Audit Scotland in January 2025 is analysed below:

	£
Auditor Remuneration	60,010
Audit Scotland fixed charges:	
• Pooled costs	(4,950)
• Sectoral Cap Adjustment	(2,470)
Total expected fee	52,590

There are no non-audit fees.

Non-audit services In our opinion there are no inconsistencies between the FRC's Ethical Standard and FSS's policy for the supply of non-audit services or any apparent breach of that policy. We continue to review our independence and ensure that appropriate safeguards are in place including, but not limited to, the rotation of senior partners and professional staff and the involvement of additional partners and professional staff to carry out reviews of the work performed and to otherwise advise as necessary.

Relationships We have no other relationships with FSS, its directors, senior managers and affiliates, and have not supplied any services to other known connected parties.

15.1 Sector developments

2024-25 reporting update

Overview and observations

HM Treasury has published updated guidance setting out the principles and standards underpinning sustainability reporting for use in central government. The guidance applies to reporting periods from 2024-25 and is available at: [Sustainability Reporting Guidance 2024-25](#).

The guidance outlines the minimum statutory reporting requirements that must be met, provides some best practice examples and also indicates the underlying principles that should be adopted in preparing the information. The guidance is applicable to all central government bodies that fall within the scope of the Greening Government Commitments (GGCs), and which produce annual reports and accounts in accordance with HM Treasury's Government Financial Reporting Manual (FRM).

The updated guidance emphasises the increasing importance of sustainability reporting and alignment with evolving global standards like the TCFD.

The principal focus of the guidance is on reporting quantitative data on emissions, waste and finite resource consumption.

Next steps

We recommend that management consider the implications of the updated HM Treasury guidance, noting the Scottish Government has still to adopt the guidance fully, for the organisation's sustainability reporting processes and review whether any adjustments to existing reporting practices are necessary to incorporate emerging best practices.

The State of the State

Background and overview

The 12th edition of Deloitte and Reform's report on the UK public sector was launched in January 2024. Since 2012, we have aimed to create an annual snapshot of what's happening across government and public services to serve as an evidence base for informed discussion.

This year's State of the State finds public attitudes are concerned with NHS waiting lists, immigration and the country's infrastructure – alongside the increased cost of living crisis from prior years.

After years of reacting to crises, the latest State of the State report finds officials across the public sector eager for reform and calling for bold decisions about the future of government and public services.

Some key findings:

- The public expects big government to continue – but could be in for a shock
- Government needs to prioritise, so its aspirations match its resources
- People want public services they can access and complain to when things go wrong
- Digital maturity comes with mature digital problems

Next steps

Full report is available at: [The State of the State 2024 | Deloitte UK](#)

15.2 Sector Developments

Fiscal sustainability and reform in Scotland

Key messages

- **Unsustainable Spending:** Current spending patterns are unaffordable, relying on short-term fixes that create long-term risks.
- **Widening Funding Gap:** A growing gap between spending and funding is projected, driven by rising demands in health, social care, and social justice.
- **Lack of Long-Term Vision:** The Scottish Government has not set out a clear vision for reform or a concrete plan to achieve fiscal sustainability.
- **Insufficient Leadership & Governance:** Weak governance arrangements and a lack of clear leadership are hindering the progress of public service reform.
- **Limited Transparency & Scrutiny:** Delays in publishing key financial strategies and insufficient public reporting are limiting transparency and scrutiny.
- **Unclear Impact of Reform:** The Scottish Government has not clearly articulated how reform will impact the affordability of public services or different groups in society.

Recommendations

- **Publish Medium-Term Strategies:** Immediately release financial and infrastructure strategies, including a transparent Fiscal Sustainability Delivery Plan outlining risks and management options.
- **Strengthen Public Service Reform:**
 - By Summer 2025, present a clear vision for reform, including its contribution to fiscal sustainability, cost implications, timelines, and impact assessments.
 - By end of 2024/25, embed new governance arrangements to support this vision.
 - By 2026/27 budget, improve data collection on reform savings, costs, and progress.
 - By September 2025, review and update mandate letters to align with reform priorities.
 - Integrate equalities and human rights considerations into reform decisions and report on progress by end of 2025.

Fiscal sustainability and reform in Scotland



This is a summary of an [Audit Scotland Publication](#) dated November 2024.

15.3 Sector Developments

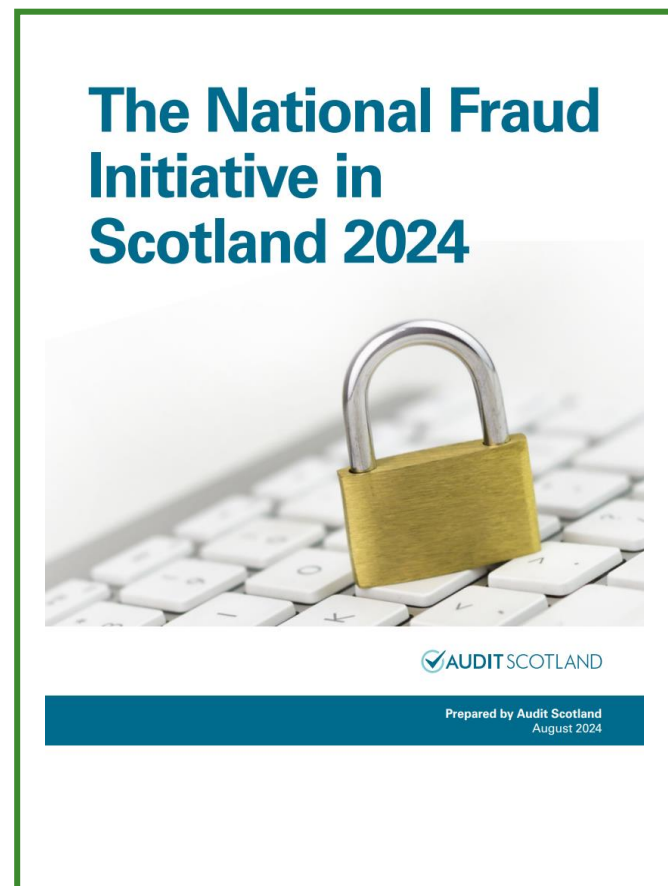
The National Fraud Initiative in Scotland 2024

Key messages

- Fraud remains a significant risk, costing taxpayers and undermining public trust. The NFI is crucial for proactive fraud detection and prevention, especially as public bodies navigate financial pressures.
- NFI efforts resulted in £21.5 million in savings and outcomes, a notable increase from previous years. However, this increase is partially attributed to improved recording practices and methodological changes, making it difficult to draw conclusions about underlying fraud levels.
- While NFI governance and follow-up arrangements are generally sound, there's room for improvement. Notably, resource constraints pose a challenge to effective follow-up on data matches.

Recommendations

- **Resource Allocation:** Ensure adequate resources are available for efficient and effective NFI follow-up activities, aligning with local priorities.
- **Planning & Self-Assessment:** Utilise the NFI Self-Appraisal Checklist during the planning phase for the 2024/25 exercise to identify and address potential areas for improvement.
- **Monitoring & Analysis:** Implement robust monitoring mechanisms for follow-up activities. Investigate and understand the reasons behind low or nil outcomes to enhance future NFI exercises.



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