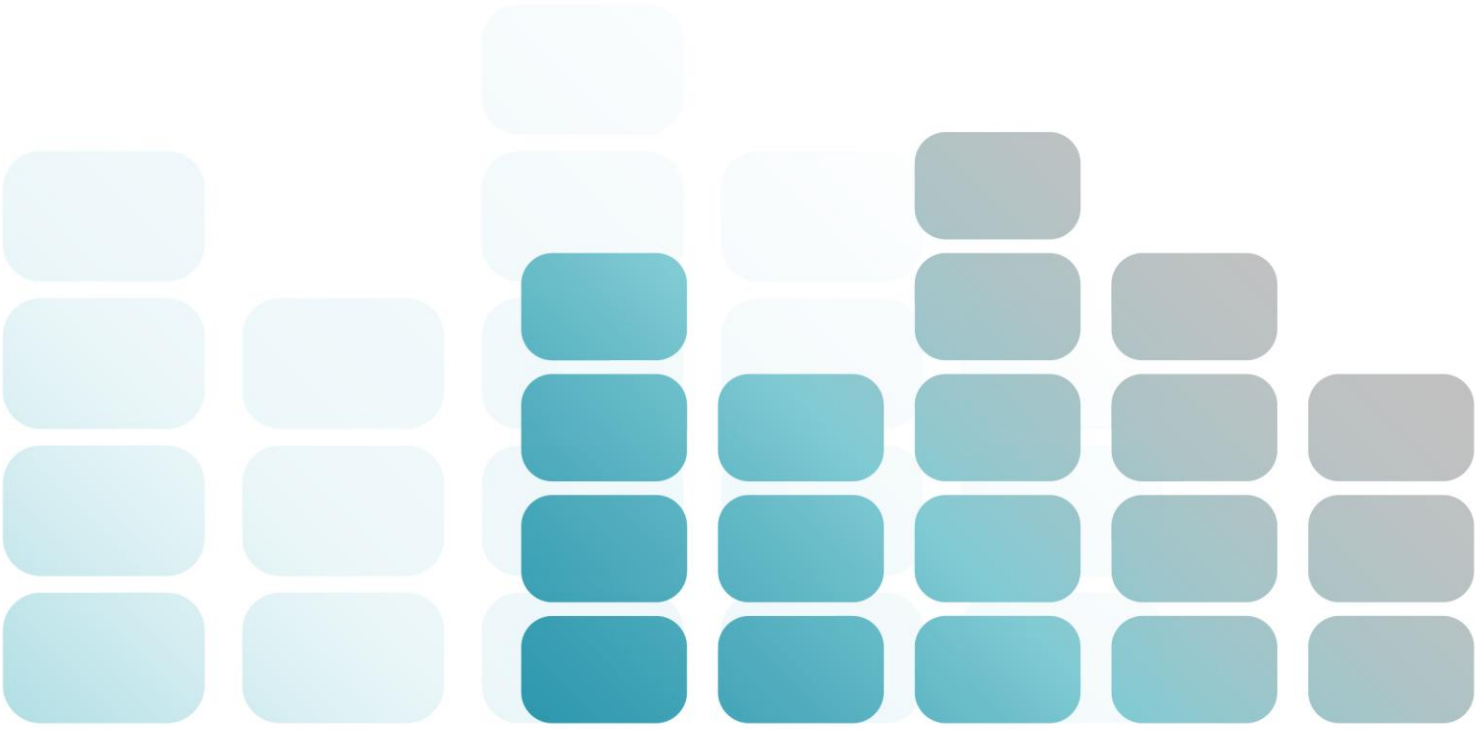


Accountant in Bankruptcy

Annual Audit Plan 2025/26



Prepared for Accountant in Bankruptcy
February 2026

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Introduction

Purpose of the Annual Audit Plan

1. The purpose of this Annual Audit Plan is to provide an overview of the planned scope and timing of the 2025/26 audit of the Accountant in Bankruptcy's (AiB) annual report and accounts. It outlines the audit work planned to meet the audit requirements set out in [auditing standards](#) and the [Code of Audit Practice](#), including supplementary guidance.

Appointed auditor and independence

2. Stephanie Harold, of Audit Scotland, has been appointed by the Auditor General for Scotland as external auditor of AiB for the period from 2022/23 until 2026/27. The 2025/26 financial year is therefore the fourth of the five-year audit appointment.

3. Stephanie Harold and the audit team are independent of AiB in accordance with relevant ethical requirements, including the Financial Reporting Council's Ethical Standard. This standard imposes stringent rules to ensure the independence and objectivity of auditors. Audit Scotland has robust arrangements in place to ensure compliance with ethical standards. The arrangements are overseen by the Executive Director of Innovation and Quality, who serves as Audit Scotland's Ethics Partner.

4. The Ethical Standard requires auditors to communicate any relationships that may affect the independence and objectivity of the audit team. There are no such relationships pertaining to the audit of AiB to communicate.

Audit scope and responsibilities

Scope of the audit

5. The audit is performed in accordance with the Code of Audit Practice, including supplementary guidance, International Standards on Auditing (UK), and relevant legislation. These set out the requirements for the scope of the audit which includes:

- An audit of the financial statements and an opinion on whether they give a true and fair view and are free from material misstatement.
- An opinion on the regularity of income and expenditure.
- An opinion on statutory other information published with the financial statements in the annual report and accounts, namely the Performance Report and the Governance Statement.
- An opinion on the audited part of the Remuneration Report and Staff Report.
- Concluding on the financial sustainability of AiB and a review of the Governance Statement.
- Reporting on AiB's arrangements for securing Best Value.
- Providing assurance on the Scottish Government Consolidation return (as applicable).
- Provision of an Annual Audit Report setting out significant matters identified from the audit of the annual report and accounts and the wider scope areas specified in the Code of Audit Practice.

Responsibilities

6. The Code of Audit Practice sets out the respective responsibilities of AiB and the auditor. A summary of the key responsibilities is outlined below.

Auditor's responsibilities

7. The responsibilities of auditors in the public sector are established in the Public Finance and Accountability (Scotland) Act 2000. These include providing an independent opinion on the financial statements and other information reported within the annual report and accounts, and concluding on AiB's arrangements in place for the wider scope areas.

Accountable Officer's responsibilities

8. The Accountable Officer has primary responsibility for ensuring proper financial stewardship of public funds, compliance with relevant legislation and establishing effective arrangements for governance, propriety and regularity that enables it to successfully deliver its objectives. The features of proper financial stewardship include:

- Establishing arrangements to ensure the proper conduct of its affairs.
- Preparation of an annual report and accounts, comprising financial statements that give a true and fair view and other information.
- Establishing arrangements for the prevention and detection of fraud, error and irregularities, and bribery and corruption.
- Implementing arrangements to ensure its financial position is soundly based.
- Making arrangements to secure Best Value.
- Establishing an internal audit function.

Audit of the annual report and accounts

Introduction

9. The audit of the annual report and accounts is driven by materiality and the risks of material misstatement in the financial statements, with greater attention being given to the significant risks of material misstatement. This chapter outlines materiality, the significant risks of material misstatement that have been identified, and the impact these have on the planned audit procedures.

Materiality

10. The concept of materiality is applied by auditors in planning and performing an audit, and in evaluating the effect of any uncorrected misstatements on the financial statements or other information reported in the annual report and accounts.

11. Broadly, the concept of materiality is to determine whether matters identified during the audit could reasonably be expected to influence the decisions of users of the financial statements. Auditors set a monetary threshold when determining materiality, although some issues may be considered material by their nature. Therefore, materiality is ultimately a matter of the auditor's professional judgement.

12. The materiality levels determined for the audit of AiB are outlined in [Exhibit 1](#).

Exhibit 1

2025/26 Materiality levels for Accountant in Bankruptcy

Materiality	Amount
Materiality – based on an assessment of the needs of users of the financial statements and the nature of AiB's operations, the benchmark used to determine materiality is gross income based on the audited 2024/25 financial statements. Materiality has been set at 2% of the benchmark.	£184,000
Performance materiality – this acts as a trigger point. If the aggregate of misstatements identified during the audit exceeds performance materiality, this could indicate that	£138,000

Materiality	Amount
further audit procedures are required. Using professional judgement, performance materiality has been set at 75% of planning materiality.	
Reporting threshold – all misstatements greater than the reporting threshold will be reported.	£10,000

Source: Audit Scotland

Significant risks of material misstatement to the financial statements

13. The risk assessment process draws on the audit team's cumulative knowledge of AiB, including the nature of its operations and its significant transaction streams, the system of internal control, governance arrangements and processes, and developments that could impact on its financial reporting.

14. Based on the risk assessment process, significant risks of material misstatement to the financial statements have been identified and these are summarised in [Exhibit 2](#). These are the risks which have the greatest impact on the planned audit approach, and the planned audit procedures in response to the risks are outlined in Exhibit 2.

15. The risk assessment process is an iterative and dynamic process. The assessment of risks set out in this Annual Audit Plan and Exhibit 2 may change as more information and evidence is obtained over the course of the audit. Where such changes occur, these will be reported to AiB and those charged with governance, where relevant.

Exhibit 2

Significant risks of material misstatement to the financial statements

Risk of material misstatement	Planned audit response
<p>Fraud caused by management override of controls</p> <p>Management is in a unique position to perpetrate fraud because of management's ability to override controls that otherwise appear to be operating effectively.</p>	<p>The audit team will:</p> <ul style="list-style-type: none"> • Evaluate the design and implementation of controls over journal entry processing. • Make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries. • Test journals entries, focusing on those that are assessed as higher risk.

Risk of material misstatement	Planned audit response
	<ul style="list-style-type: none"> • Evaluate significant transactions outside the normal course of business. • Assess the adequacy of controls in place for identifying and disclosing related party relationships and transactions in the financial statements. • Assess changes to the methods and underlying assumptions used to prepare accounting estimates and assess these for evidence of management bias.

Source: Audit Scotland

16. On 1 October 2024, the Scottish Government replaced the existing financial and HR systems with the new Oracle cloud-based system. We undertook work as part of our 2024/25 audit to ensure the accuracy and completeness of the migration of data to Oracle, with no issues identified.

17. In November 2025, AiB migrated the remaining case related income to Oracle. Prior to November 2025, case related income transactions were raised in the case management systems ASTRA and Basys. These were processed using the SAGE general ledger (including the receipt of funds). These were then journalled monthly into Oracle. From November 2025 onwards, case related income transactions are still raised on the case management systems. These are then processed on Oracle, removing the need for the SAGE general ledger. As part of our audit, we will review the output from Oracle and reconciliations in relation to the case related income to confirm the reliability and completeness of data and consider the risk of classification errors in the financial statements.

Key audit matters

18. The Code of Audit Practice requires public sector auditors to communicate key audit matters. Key audit matters are those matters, that in the auditor's professional judgement, are of most significance to the audit of the financial statements and require most attention when performing the audit.

19. In determining key audit matters, auditors consider:

- Areas of higher or significant risk of material misstatement.
- Areas where significant judgement is required, including accounting estimates that are subject to a high degree of estimation uncertainty.
- Significant events or transactions that occurred during the year.

20. The matters determined to be key audit matters will be communicated in the Annual Audit Report. Exhibit 2 outlines the significant risks of material misstatement to the financial statements that have been identified, including those that have greatest impact on the planned audit procedures and require most attention when performing the audit.

Regularity

21. Auditors are required by the Public Finance and Accountability (Scotland) Act 2000 to report on whether expenditure and income were incurred or applied, in all material respects, in accordance with applicable enactments and guidance issued by the Scottish Ministers (generally referred to as the regularity opinion).

22. We will adopt an integrated audit approach to meeting this responsibility and use work on the audit of the financial statements supplemented by additional testing for any irregular transactions, where necessary.

Wider scope and Best Value

Introduction

23. Reflecting the fact that public money is involved, the Code of Audit Practice requires that public audit is planned and undertaken from a wider perspective than in the private sector. The wider scope audit set out by the Code of Audit Practice broadens the audit of the annual report and accounts to include consideration of additional aspects or risks in four wider scope areas.

24. Due to the nature and size of AiB and its limited financial activity, it is considered a less complex body for the wider scope audit. Therefore, the wider scope audit does not consider all four wider scope areas and is instead limited to concluding on the financial sustainability of the body.

25. Financial sustainability means looking forward over the medium and longer term in planning the services to be delivered and how they will be delivered effectively. This is assessed by considering AiB's medium to longer-term planning for service delivery. A conclusion on the financial sustainability of AiB will be reported in the Annual Audit Report.

Duty of Best Value

26. 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. [Best Value in public services: guidance for Accountable Officers](#) is issued by Scottish Ministers and sets out their duty to ensure that arrangements are in place to secure Best Value in public services.

27. Consideration of the arrangements AiB has in place to secure Best Value will be carried out alongside the wider scope audit, and a conclusion on the arrangements AiB has in place will be reported in the Annual Audit Report.

28. Auditors may also carry out specific audit work covering the seven Best Value themes set out in the SPFM. The risk assessment process did not identify a need to carry out specific audit work on any of the themes.

Wider scope and Best Value risks

29. The risk assessment process has identified risks in the wider scope areas and Best Value as outlined in Exhibit 4, and this includes the planned audit procedures in response to the risks.

Exhibit 3

Wider scope and Best Value risks

Description of risk	Planned audit response
<p>Financial sustainability</p> <p>Whilst AiB has set a balanced budget for 2025/26, the medium-term plan identifies increasing shortfalls in the following years budgets of over £2 million over the period 2026/27 to 2028/29. This is due to inflationary and pay related pressures. AiB will be required to identify savings to mitigate these shortfalls with similar challenges being seen across the public sector in Scotland.</p> <p>Staff costs are continuing to increase, nearing 70% of AiB's overall expenditure. AiB is predominately funded through fees set out in the Bankruptcy Fees (Scotland) Regulations 2018 as amended, with smaller amounts of revenue funding from the Scottish Government. Downward fluctuations in bankruptcy income would create additional pressures.</p> <p>Within this financial environment, AiB faces challenges going forward in maintaining the delivery of services in a financially sustainable way.</p> <p>This position also highlights the importance of AiB ensuring their medium-term plan is reviewed annually and reflects the most recent financial position looking forward.</p>	<p>The audit team will:</p> <ul style="list-style-type: none"> • Review AiB's annual budget setting and monitoring arrangements. • Review AiB's financial position and plans for and delivery of savings. • Assess progress in refreshing the medium-term rolling financial plan and incorporating enhanced savings reporting into this plan to address the identified shortfalls. • Consider AiB's resource capacity for ensuring forward-looking financial plans are revised on an annual basis, following the departure of the Head of Finance in February 2025.

Source: Audit Scotland

Reporting arrangements, timetable and audit fee

Audit outputs

30. The outputs from the 2025/26 audit include:

- This Annual Audit Plan.
- An Independent Auditor's Report to AiB, the Auditor General for Scotland, and the Scottish Parliament setting out opinions on the annual report and accounts.
- An Annual Audit Report to AiB and the Auditor General for Scotland setting out significant matters identified from the audit of the annual report and accounts, conclusions from the wider scope and Best Value audit, recommendations, where required, and any good practice identified.

31. The matters to be reported in the outputs will be discussed with AiB for factual accuracy before they are issued. All outputs from the audit will be published on [Audit Scotland's website](#), apart from the Independent Auditor's Report, which is included in the audited annual report and accounts.

32. Target dates for the audit outputs are set by the Auditor General for Scotland. In setting the target dates for the audit outputs, consideration is given to the target date for laying the annual report and accounts, which is 31 August 2026 for central government agencies and non-ministerial departments.

33. The audit team will be unable to achieve the target date of 31 August 2026 for issuing the Independent Auditor's Report and Annual Audit Report. This is following on from the rescheduling of the audit in 2024/25 and due to prioritising the quality of our audit work over meeting target dates, as required by the Auditor General for Scotland, and consistent with messaging from the Financial Reporting Council which has made clear that audit quality takes precedence. The audit will work towards completion of the audit work by the later date of 31st October 2026. A two stage audit will be undertaken with work carried out in June and then completed in October. We are working towards delivering the audit by target dates over the course of the five-year audit appointment.

Audit timetable

34. Achieving the timetable for production of the annual report and accounts, supported by complete and accurate working papers, is critical to delivery of the audit to agreed target dates. [Exhibit 4](#) includes a timetable for the audit, which has been agreed with management. Agreed target dates will be kept under review as the audit progresses, and any changes required, and their potential impact, will be discussed with AiB and reported to those charged with governance, where required.

Exhibit 4

2025/26 audit timetable

Audit activity	AiB target date	Audit team target date	Relevant committee date
Issue of Annual Audit Plan		31 March 2025	11 February 2026
Annual report and accounts:			
<ul style="list-style-type: none"> Consideration of unaudited annual report and accounts by those charged with governance 	01 June 2026		N/A
<ul style="list-style-type: none"> Submission of unaudited annual report and accounts and all working papers to audit team 	01 June 2026		N/A
<ul style="list-style-type: none"> Latest date for audit clearance meeting 	October 2026	October 2026	
<ul style="list-style-type: none"> Issue of draft Letter of Representation, proposed Independent Auditor's Report, and proposed Annual Audit Report 		Late October 2026	
<ul style="list-style-type: none"> Agreement of audited and unsigned annual report and accounts 		Early November 2026	
<ul style="list-style-type: none"> Approval by those charged with governance and signing of audited annual report and accounts 	Early November 2026	Early November 2026	Early November 2026
<ul style="list-style-type: none"> Signing of Independent Auditor's Report and issue of Annual Audit Report 		November 2026	November 2026

Audit activity	AiB target date	Audit team target date	Relevant committee date
Certification of Scottish Government Consolidation Return		At completion of audit	

Source: Audit Scotland

Audit fee

35. AiBs audit fee is determined in line with Audit Scotland's fee setting arrangements. The agreed notional audit fee for the 2025/26 audit is set out in [Exhibit 5](#).

36. In setting the audit fee, it is assumed that AiB has effective governance arrangements in place and the complete annual report and accounts will be provided for audit in line with the agreed timetable. The audit fee assumes there will be no significant changes to the planned scope of the audit. Where the audit cannot proceed as planned, for example, due to incomplete or inadequate working papers, the audit fee may need to be increased.

Exhibit 5

Notional audit fee

Fee component ¹	Fee (£)
External auditor remuneration, limited to sectoral cap increase	48,700
Pooled costs, such as travel and subsistence costs	4,130
Additional fee – review of HTML accounts for publication	1,500
Additional fee – additional testing around income migration on Oracle	2,000
Total 2025/26 fee	56,330

Source: Audit Scotland

¹ Information on the components that make up the total fee can be found in Audit Scotland's [Audit management and quality guidance](#).

Other matters

Internal audit

37. AiB is responsible for establishing an internal audit function as part of an effective system of internal control. As part of the audit, the audit team will obtain an understanding of internal audit, including its nature, responsibilities, and activities.

38. While internal audit and external audit have differing roles and responsibilities, external auditors may seek to rely on the work of internal audit where it is considered appropriate. A review of internal audit's 2025/26 audit plan was carried out to identify if there were any areas where the audit team could rely on its work. The audit team concluded it will not rely on internal audit's work. However, the audit team will review internal audit's reports and assess if there is any impact on the audit.

Audit quality

39. Audit Scotland is committed to the consistent delivery of high-quality audit. Audit quality requires ongoing attention and improvement to keep pace with external and internal changes. Details of the arrangements in place for the delivery of high-quality audits is available from the [Audit Scotland website](#).

40. The International Standards on Quality Management (ISQM) applicable to Audit Scotland for 2025/26 audits are:

- ISQM (UK) 1, which deals with an audit organisation's responsibilities to design, implement, and operate a system of quality management (SoQM) for audits. Audit Scotland's SoQM consists of a variety of components, such as governance arrangements and culture to support audit quality, compliance with ethical requirements, ensuring Audit Scotland is dedicated to high-quality audit through engagement performance and resourcing arrangements, and ensuring there are robust quality monitoring arrangements in place. Audit Scotland carries out an annual evaluation of its SoQM and has concluded it complies with this standard.
- ISQM (UK) 2, which sets out arrangements for conducting engagement quality reviews, which are performed by senior management not involved in an audit, to review significant judgements and conclusions reached by the audit team, and the appropriateness of proposed audit opinions on high-risk audits.

41. To monitor quality at an individual audit level, Audit Scotland carries out internal quality reviews on a sample of audits. Additionally, the Institute of Chartered Accountants of England and Wales (ICAEW) carries out independent quality reviews on a sample of audits.

42. Actions to address deficiencies identified by internal and external quality reviews are included in a rolling Quality Improvement Action Plan, which is used to support continuous improvement. Progress with implementing planned actions is monitored on a regular basis by Audit Scotland's Quality and Ethics Committee.

43. Audit Scotland may periodically seek the views of AiB on the quality of audit services provided. The audit team would also welcome feedback at any time.

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