



National Records of Scotland External Audit Plan

Financial year ending 31 March 2026

Prepared for those Charged with Governance and the
Auditor General for Scotland

26 February 2026

Contents



Section	Page
1. Introduction and Headlines	03
2. Identified risks	06
3. Other matters	11
4. Our approach to materiality	14
5. IT audit strategy	17
6. Wider scope and best value arrangements	19
7. Logistics	22
8. Fees and related matters	25
9. Independence considerations	27
10. Communication of audit matters with those charged with governance	29
11. Appendices	31

01 Introduction and Headlines

Introduction and headlines (1)

The audit plan sets out our risk-based audit approach for National Records of Scotland. This plan outlines our initial risk assessment and is reported to those charged with governance (Audit and Risk Committee) and will be shared with Audit Scotland.

Purpose

- This document provides an overview of the planned scope and timing of the statutory audit of the National Records of Scotland for those charged with governance.

Respective responsibilities

- The Code of Audit Practice (the Code) summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities, and that of the National Records of Scotland are summarised in the Appendix of this Audit Plan. We draw your attention to this and the Code.

Scope of our Audit

- The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on the National Records of Scotland's financial statements that have been prepared by management with the oversight of those charged with governance (the Audit and Risk Committee). The audit of the financial statements does not relieve management or the Audit and Risk Committee of your responsibilities.
- It is your responsibility to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. As part of our wider scope work, we will consider how you are fulfilling these responsibilities.
- Our audit approach is based on a thorough understanding of the National Records of Scotland and is risk based.

Significant risks

Those risks requiring special audit consideration and procedures to address the likelihood of a material financial statement error have been identified as:

- Risk of fraud in income recognition (ISA (UK) 240) (this risk has been rebutted)
- Risk of fraud in expenditure recognition (PN 10) (this risk has been rebutted)
- Management override of control (ISA (UK) 240)
- Valuation of land and buildings

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Annual Audit (ISA 260) Report.

Wider Scope and Best Value Audit

In accordance with the Code, our planning considers the Wider Scope and Best Value areas of audit. No significant risks were identified in relation to financial sustainability, financial management, vision, leadership and governance or use of resources to improve outcomes. We will continue to review your arrangements in this area and report findings and conclusions as part of our Annual Audit Report.

Introduction and headlines (2)

Materiality

We have calculated our planning materiality to be £0.915 million (PY: £0.833 million) for the organisation, which equates to 2.5% (PY: 2.5%) of your prior year gross expenditure as per the audited 2024/25 financial statements.

Performance materiality has been determined as £0.686 million (PY: £0.618 million) and is based on 75% (PY: 70%) of planning materiality.

We are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. Clearly trivial has been calculated at 5% of materiality being £0.046 million (PY: £0.044 million).

A lower materiality threshold of £25,000 will be used for the auditable elements of the Remuneration and Staff Report, with the exception of the Staff Costs and Numbers note which will be audited at headline materiality.

We will revisit our materiality throughout our audit including updating to reflect the draft unaudited financial statements for 2025/26

Audit logistics

Our final visit will take place at the end of June into July, with reporting taking place at the end of August. Our key deliverables are this Audit Plan and the Auditor's Annual Report. Audit Scotland's target date for central government agency bodies is 31 August 2026.

Audit fees were shared by Audit Scotland with National Records of Scotland in a letter dated 15 January 2026 and approved at the Audit and Risk Committee on 26 February 2026. Audit fees are paid to Audit Scotland, who in turn pay us. We reserve the right to review our fee during the audit should significant delays be encountered and/or new technical matters arise. Further details with regards to audit fees are included within section 8 of our plan.

At the planning stage, we can confirm that there are no planned non-audit services.

We have complied with the Financial Reporting Council's Ethical Standard (revised 2024) and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

02 Identified risks

Significant risks identified (1)

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.



“In determining significant risks, the auditor may first identify those assessed risks of material misstatement that have been assessed higher on the spectrum of inherent risk to form the basis for considering which risks may be close to the upper end. Being close to the upper end of the spectrum of inherent risk will differ from entity to entity and will not necessarily be the same for an entity period on period. It may depend on the nature and circumstances of the entity for which the risk is being assessed. The determination of which of the assessed risks of material misstatement are close to the upper end of the spectrum of inherent risk, and are therefore significant risks, is a matter of professional judgment, unless the risk is of a type specified to be treated as a significant risk in accordance with the requirements of another ISA (UK).” (ISA (UK) 315).

In making the review of unusual significant transactions “the auditor shall treat identified significant related party transactions outside the entity’s normal course of business as giving rise to significant risks.” (ISA (UK) 550).



Management should expect engagement teams to challenge management in areas that are complex, significant or highly judgmental which may be the case for accounting estimates, going concern, related parties and similar areas. Management should also expect to provide to engagement teams with sufficient evidence to support their judgments and the approach they have adopted for key accounting policies referenced to accounting standards or changes thereto.

Where estimates are used in the preparation of the financial statements management should expect teams to challenge management’s assumptions and request evidence to support those assumptions.

Significant risks identified (2)

Significant Risk	Description	Key aspects of our proposed response to the risk
Fraud in revenue Recognition	<p>Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue. This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.</p> <p>(rebutted)</p>	<p>Having considered the risk factors set out in ISA 240 and the nature of the revenue streams at the National Records of Scotland, we have determined that the risk of fraud arising from revenue recognition for all revenue streams can be rebutted, because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate revenue recognition; and • opportunities to manipulate revenue recognition are very limited. <p>Total operating income for 2024/25 was £6.859 million. The most significant element of this was income from fees and charges for records and associated services, totalling £6.796 million. This revenue stream comprises a high volume of low-value transactions, which reduces the scope for management manipulation or fraud. The risk is also considered low for income received directly from the Scottish Government, given its predictable nature and the controls surrounding the funding process. Property rental income is immaterial in the context of overall revenue, is subject to reliable forecasting, and can be readily verified to underlying lease and contractual agreements.</p> <p>Therefore, we do not consider this to be a significant risk for the National Records of Scotland.</p>
Fraud in expenditure recognition	<p>Due to the presumption that there are risks of fraud in expenditure recognition, we are required to evaluate which types of expenditure, expenditure transactions or assertions give rise to such risks. Practice Note 10: Audit of Financial Statements of Public Sector Bodies in the United Kingdom (PN10) states:</p> <p>"As most public bodies are net spending bodies, then the risk of material misstatement due to fraud related to expenditure may be greater than the risk of material misstatements due to fraud related to revenue recognition".</p> <p>(rebutted)</p>	<p>Having considered the risk factors set out in ISA 240 and the nature of the expenditure streams at the National Records of Scotland, we have determined that the risk of fraud arising from expenditure recognition can be rebutted, because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate expenditure recognition; • opportunities to manipulate expenditure recognition are very limited; and • regular dialogue with the Scottish Government to monitor financial performance provides limited opportunity to manipulate the financial position. <p>A large proportion of expenditure relates to resources consumed in the direction and control of day-to-day operations such staff and wages, employee-related expenditure, premises, and supplies and services. These expenditure streams and processes are largely automated and therefore the risk of fraud in expenditure recognition is deemed low.</p> <p>Therefore, we do not consider this to be a significant risk for the National Records of Scotland.</p>

Significant risks identified (3)

Significant risk	Description	Key aspects of our proposed response to the risk
Management override of controls	<p>Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management override of controls is present in all entities.</p> <p>Our risk focuses on the areas of the financial statements where there is potential for management to use their judgement to influence the financial statements alongside the potential to override the entity's internal controls, related to individual transactions.</p> <p>We have therefore identified management override of controls, in particular journals, management estimates and of transactions outside the course of business as a significant risk of material misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none"> • Document our understanding of and evaluate the design effectiveness of management's key controls over journals; • Analyse your full journal listing for the year and use this to determine our criteria for selecting high risk journals, with specific focus on journals posted by individuals directly employed by National Records of Scotland; • Test the high-risk journals we have identified; • Gain an understanding of the critical judgements applied by management in the preparation of the financial statements and consider their reasonableness; • Gain an understanding of the key accounting estimates made by management and carry out substantive testing on in scope estimates. • Evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions.

Significant risks identified (4)

Significant risk	Description	Key aspects of our proposed response to the risk
Valuation of land buildings	<p>In accordance with the HM Treasury Financial Reporting Manual (FRM), subsequent to initial recognition, National Records of Scotland is required to hold property, plant and equipment on a valuation basis. The valuation basis used will depend on the nature and use of the assets. Specialised land, buildings, equipment, installations and fittings are held at depreciated replacement costs, as a proxy for fair value. Non-specialised land and buildings, such as offices, are held at fair value.</p> <p>National Records of Scotland appoint the District Valuer Services (a division of the Valuation Office Agency) to undertake a rolling programme of valuations across their asset base, professionally valuing land and buildings at least once every five years with supplementary interim desktop valuations. As at 31 March 2025, National Records of Scotland held property, plant and equipment (PPE) of £19.702 million including land of £2.265 million and buildings of £9.266 million.</p> <p>Given the significant value of the land and buildings held by National Records of Scotland, and the level of complexity and judgement involved in their estimation process, there is an inherent risk of material misstatement in the year end valuation of some of these assets.</p> <p>We will therefore focus our audit attention on assets that have large and unusual changes in valuations compared to last year and/or unusual approaches to their valuations, as a significant risk requiring special audit consideration.</p>	<p>Our testing will include:</p> <ul style="list-style-type: none"> • Evaluating management’s processes and controls for the calculation of the valuation estimates, the instructions issued to their management experts and the scope of their work; • Evaluating the competence, capabilities and objectivity of the valuation expert; • Writing to the valuer to confirm the basis on which the valuations were carried out; • Challenge the information and assumptions used by the valuer to assess completeness and consistency with our understanding; • Evaluating the valuer’s report to identify assets that have large and unusual changes and/or approaches to the valuation – these assets will be substantially tested to ensure the valuations are reasonable; • Testing a sample of other asset revaluations made during the year to ensure they have been input accurately into the body’s asset register and associated entries in the financial statements; • Evaluating the assumptions made by management for any assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value; • For any assets not formally revalued, evaluation the judgement made by management or others in the determination of the current value of these assets.

03 Other matters

Other matters (1)

Other work

In addition to our expected responsibilities under the Code of Practice, we have a number of other audit responsibilities, as follows:

- We audit parts of your Remuneration and Staff Report in your Annual Report and check whether these sections of your Annual Report have been properly prepared (opinion). These procedures are performed to a lower materiality.
- We read the sections of your Annual Report which are not subject to audit and check that they are consistent with the financial statements on which we give an opinion (opinion).
- We carry out work to satisfy ourselves that disclosures made in your Annual Governance Statement are in line with requirements set out in the FReM 2025/26 (opinion).
- We carry out work in order to express an opinion on whether in all material respects, expenditure was incurred and income applied in accordance with applicable enactments and guidance issued by the Scottish Ministers (opinion).

- We consider our other duties under the Code and planning guidance (2025/26) issued by Audit Scotland, as and when required, including:
 - supporting Audit Scotland in Section 22 reporting
 - review of central government technical guidance prior to issue by Audit Scotland
 - providing regular updates to Audit Scotland to share awareness of current issues
 - notifying Audit Scotland of any cases of money laundering or fraud.

Other material balances and transactions

Under International Standards on Auditing, "irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure". All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the risks identified in this report. We do not place reliance on the work undertaken by internal audit.

Other matters (2)

Going concern assessment

As auditors, we are required to obtain sufficient appropriate audit evidence regarding, and conclude on:

- whether a material uncertainty related to going concern exists; and
- the appropriateness of management's use of the going concern basis of accounting in the preparation of the financial statements.

The Public Audit Forum has been designated by the Financial Reporting Council as a "SORP-making body" for the purposes of maintaining and updating Practice Note 10: Audit of financial statements and regularity of public sector bodies in the United Kingdom (PN 10). It is intended that auditors of public sector bodies read PN 10 in conjunction with (ISAs) (UK).

PN 10 was updated in 2020 to take account of revisions to ISAs (UK), including ISA (UK) 570 (Revised September 2019) on going concern.

PN 10 allows auditors to apply a 'continued provision of service approach' when auditing going concern in the public sector, where appropriate. Audit Scotland's also issued further guidance in a Going Concern publication in December 2020).

Within our wider scope work we will conclude on the National Records of Scotland's arrangements to ensure financial sustainability.

Internal control environment

During our initial audit planning we will develop our understanding of your control environment (design and implementation) as it relates to the preparation of your financial statements. In particular we will:

- Consider key business processes and related controls
- Assess the design of key controls over all significant risks we have identified. This will include key controls over:
 - Journal entries and other key entity level controls
 - The completeness and accuracy of information provided to your external valuer to perform the valuation of land and buildings assets
 - The review of valuation outputs including key assumptions made by the valuer and significant movements in revalued assets

Our focus is on design and implementation of controls only. We do not intend to assess or place any reliance on the operating effectiveness of your controls during our audit.

04 Our approach to materiality

Our approach to materiality (1)

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Matter Description

1. Determination

We have determined planning materiality (financial statement materiality) at the planning stage of the audit based on professional judgement in the context of our knowledge of the business, including consideration of factors such as shareholder expectations, industry developments, financial stability and reporting requirements for the financial statements. We have determined financial statement materiality based on a proportion of the gross operating costs of the entity for the financial year.

At the planning stage of our audit, materiality is set at £0.915 million (PY: £0.833 million), which equates to 2.5% of your prior year gross operating costs for the year. Performance materiality for National Records of Scotland has been set at £0.686 million (PY: £0.618 million).

2. Other factors

An item does not necessarily have to be large to be considered to have a material effect on the financial statements.

3. Reassessment of materiality

Our assessment of materiality is kept under review throughout the audit process.

Planned audit procedures

- We determine planning materiality in order to:
 - establish what level of misstatement could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements
 - assist in establishing the scope of our audit engagement and audit tests
 - determine sample sizes and
 - assist in evaluating the effect of known and likely misstatements in the financial statements
- An item may be considered to be material by nature when it relates to:
 - instances where greater precision is required (e.g. the auditable elements of the Remuneration and Staff Report)
- We reconsider planning materiality on receipt of the draft statement of accounts and if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality



Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements; Judgments about materiality are made in light of surrounding circumstances, and are affected by the size or nature of a misstatement, or a combination of both; and Judgments about matters that are material to users of the financial statements are based on a consideration of the common financial information needs of users as a group. The possible effect of misstatements on specific individual users, whose needs may vary widely, is not considered. (ISA (UK) 320)

Our approach to materiality (2)

Materiality area	2025/26 planning materiality	Qualitative factors considered
Headline materiality for the financial statements	£915,000	This is equivalent to approximately 2.5% of the gross expenditure for the period ended 31 March 2025 (2024/25: 2.5%).
Performance materiality for the financial statements	£686,250	Performance materiality has been set at 75% of financial statements materiality (2024/25: 70%). Performance materiality is used for the purposes of assessing the risks of material misstatement and determining the nature, timing, and extent of further audit procedures. This is the amount we set at less than materiality for the financial statements as a whole, to reduce to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the financial statements as a whole.
Reporting threshold	£45,800	This balance is set at £45,800 which is 5% of materiality (2024/25: 5%). All misstatements above this threshold will be reported.
<p>Auditable elements of the Remuneration and Staff Report:</p> <ul style="list-style-type: none"> • Single total figure of remuneration for each minister and director • Pension cash equivalent transfer value (CETV) disclosures for each minister and director • Payments to past directors • Payments for loss of office • Fair pay disclosures • Exit packages <p>The total staff costs analysis note will be audited at headline materiality.</p>	£25,000	<p>Due to the public interest in the specified remuneration disclosures, we apply specific audit procedures to this work and set a lower materiality level for this area. We design our procedures to detect errors in specific accounts at a lower level of precision which we have determined to be applicable for the specified remuneration disclosures.</p> <p>We evaluate errors in this disclosure for both quantitative and qualitative factors against this lower level of materiality. We will apply heightened auditor focus in the completeness and clarity of disclosures in this area and will request amendments to be made if any errors exceed the threshold we have set or would alter the bandings reported for any individual.</p>

05 IT audit strategy

IT audit strategy

In accordance with ISA (UK) 315, we are required to obtain an understanding of the IT environment related to all key business processes, identify all risks from the use of IT related to those business process controls judged relevant to our audit and assess the relevant IT general controls (ITGCs) in place to mitigate them.

The following IT applications are in scope for IT controls assessment based on the planned financial statement audit approach, we will perform the indicated level of assessment:

IT application	Audit area	Planned level IT audit assessment
Oracle Cloud	Financial reporting	<ul style="list-style-type: none"> ITGC assessment
	Valuation of land and buildings	<ul style="list-style-type: none"> Review of outputs provided by the Scottish Government auditors in relation to the financial systems including service auditor reports (where applicable).

06 Wider scope and best value arrangements

Wider scope and best value arrangements (1)

Our responsibilities under the Code extend beyond the audit of the financial statements. The Code sets out four audit areas that frame wider scope into identifiable areas. These are as set out below:



Financial management

Has the body got sound budgetary process, financial capacity and the control environment and internal controls are operating effectively.



Financial Sustainability

How the body looks forward to the medium and longer term to consider whether the body is planning effectively to deliver its services or the way in which they should be delivered.



Vision, Leadership and Governance

How effective are the body's scrutiny and governance arrangements, leadership and decision making, and transparent reporting of financial and performance information.



Use of Resources to Improve Outcomes

How the body makes best use of their resources to meet stated outcomes and improvement objectives, through effective planning and working with strategic partners and communities. This includes demonstrating economy, efficiency and effectiveness through the use of financial and other resources and reporting performance against outcomes.

We consider each of these areas through our audit planning process forming our risk assessment. Based on our planning procedures, we have not identified any significant risks in relation to Financial Sustainability, Financial Management, Vision, Leadership and Governance and Use of Resources to Improve Outcomes. We will complete our work in accordance with the code with our findings and recommendations of wider scope work performed will be communicated through the Annual Audit Report. Should a wider scope risk emerge, we will reconsider our wider scope approach as appropriate.

Wider scope and best value arrangements (2)

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.

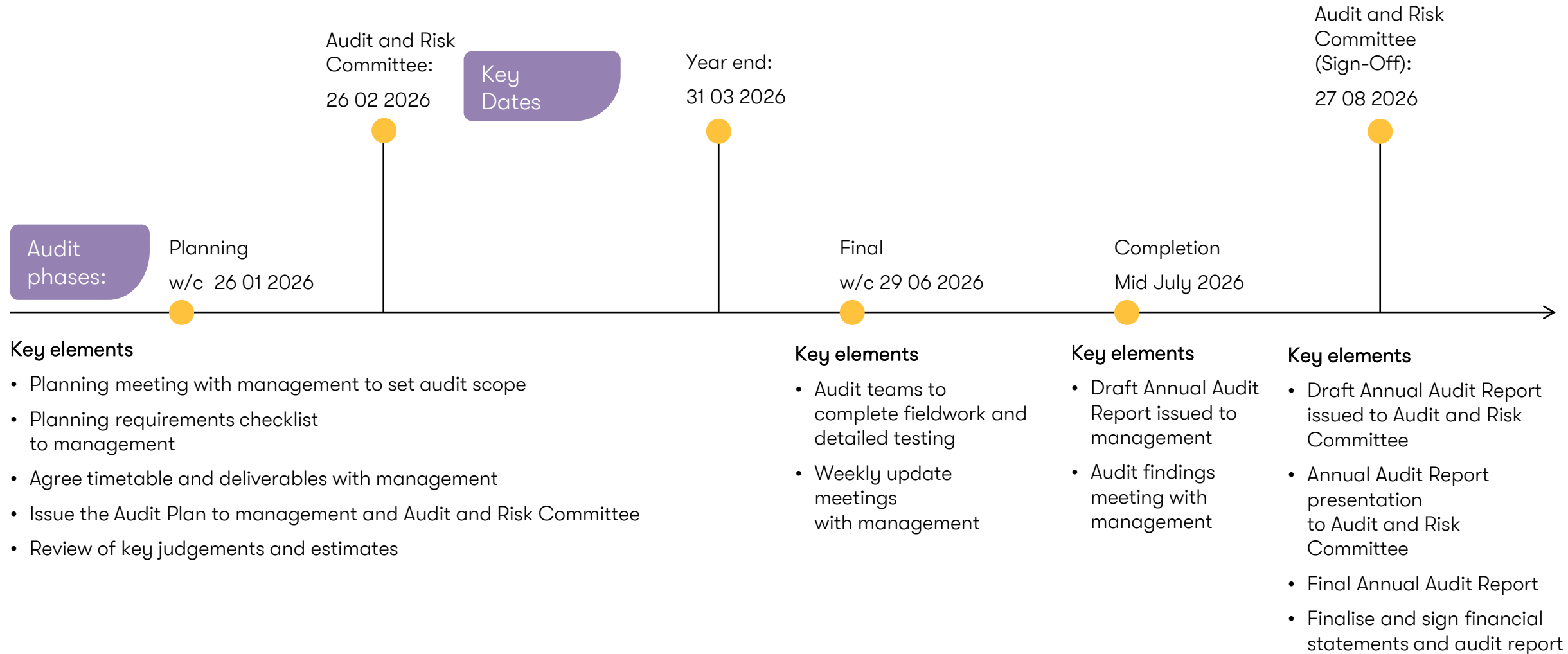
Consideration of the arrangements National Records of Scotland has in place to secure Best Value will be carried out alongside the wider scope audit, and a conclusion on the arrangements National Records of Scotland has in place will be reported in the Annual Audit Report.

Auditors may also carry out specific audit work covering the seven Best Value characteristics set out in the SPFM. The risk assessment process did not identify a need to carry out specific audit work on any of the characteristics. However, auditors are required to carry out a review of the 'fairness and equality' characteristic at least once during the audit. This will be completed during the 2026/27 audit.

07 Logistics

The Audit Timeline - Logistics

We are required to submit audit plans to Audit Scotland by 31 March 2026, and it is anticipated that we will submit audited accounts and the Annual Audit Report by 30 August 2026 in line with the Audit Scotland deadline. We have set out our planned timescales for the National Records of Scotland audit below:



Our team and communications

Angela L Pieri

Engagement Lead

T: 0161 214 6337

E: Angela.L.Pieri@uk.gt.com

- Key contact for senior management and Audit and Risk Committee
- Overall quality assurance

Note, for planning, Joanne Brown has been in the role of engagement lead due to unforeseen sickness leave.

Hannah L McKellar

Audit Senior Manager

T: 0131 659 8568

E: Hannah.L.McKellar@uk.gt.com

- Audit team management
- Resource management
- Wider scope and best value reporting

Cameron McIntyre

Audit Assistant Manager

T: 0141 223 0637

E: Cameron.R.McIntyre@uk.gt.com

- Day-to-day point of contact
- Audit planning

Pool of technical specialists (e.g. tax, VAT, IT audit)

	Service delivery	Audit reporting	Audit progress	Technical support
Formal communications	<ul style="list-style-type: none"> • Annual audit closure meeting 	<ul style="list-style-type: none"> • The Audit Plan • The Annual Audit Report 	<ul style="list-style-type: none"> • Audit planning meetings • Audit clearance meetings • Communication of issues log 	<ul style="list-style-type: none"> • Technical updates
Informal communications	<ul style="list-style-type: none"> • Open channel for discussion 		<ul style="list-style-type: none"> • Communication of audit issues as they arise 	<ul style="list-style-type: none"> • Notification of up-coming issues (where appropriate)

08 Fees and related matters

Our fee estimate

Audit Scotland set the baseline audit fee. We can increase the fee, from the baseline, for the inclusion of additional risks, new technical matters or specific client matters identified.

We are required to consider all relevant professional standards, including paragraphs 4.1 and 4.2 of the FRC's [Ethical Standard \(revised 2024\)](#) which stipulate that the Engagement Lead (Key Audit Partner) must set a fee sufficient to enable the resourcing of the audit with partners and staff with appropriate time and skill to deliver an audit to the required professional and Ethical standards.

Across all sectors and firms, the FRC has set out its expectation of improved financial reporting from organisations and the need for auditors to demonstrate increased scepticism and challenge and to undertake additional and more robust testing, as detailed in ISA (UK) 540 (revised): Auditing Accounting Estimates and Related Disclosures.

As a firm, we are absolutely committed to meeting the expectations of the FRC with regard to audit quality and public sector financial reporting. This includes, for Audit Scotland contracts, meeting the expectations of the Audit Scotland Quality Team and the Scottish Quality Framework.

Audit fees were shared by Audit Scotland with National Records of Scotland in a letter dated 15 January 2026 and approved at the Audit and Risk Committee on 26 February 2026. Audit fees will be paid to Audit Scotland who in turn pay Grant Thornton UK LLP.

We reserve the right to review our fee during the audit should significant delays be encountered and/or new technical matters arise.

Our estimate of the audit fees we will charge is set out in the table below, along with the fees billed in the prior year.

Entity	Audit Fee for 2024/25	Expected fees for 2025/26
External Audit Remuneration	£83,310*	£78,440
Pooled Costs	-£6,240	£5,880
Sectoral Cap Adjustment	£6,030	-£5,710
Total	£83,100	£78,610

*Additional fees of £7,750 was levied in 2024/25 due to the implementation of the new financial ledger system and resulting change in accounting policy.

At that planning stage, we can confirm that there are no planned non-audit services.

Our fee assumptions:

We have set out below our specific assumptions made in arriving at our estimated audit fees, we have assumed that National Records of Scotland will:

- prepare a good quality set of accounts, supported by comprehensive and well-presented working papers which are ready at the start of the audit, including the Annual Governance Statement and Annual Report
- provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made during the course of preparing the financial statements
- provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements.

09 Independence considerations

Independence considerations

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant matters that may bear upon the integrity, objectivity and independence of the firm or covered persons (including its partners, senior managers, managers). In this context, there are no matters that we are required to report.

As part of our assessment of our independence at planning we note the following matters:

Matter	Conclusions
Relationships with Grant Thornton	We are not aware of any relationships between Grant Thornton and National Records of Scotland that may reasonably be thought to bear on our integrity, independence and objectivity.
Relationships and Investments held by individuals	We have not identified any potential issues in respect of personal relationships with the entity or investments in National Records of Scotland held by individuals.
Employment of Grant Thornton staff	We are not aware of any former Grant Thornton partners or staff being employed, or holding discussions in respect of employment, by National Records of Scotland as a director or in a senior management role covering financial, accounting or control related areas.
Business relationships	We have not identified any business relationships between Grant Thornton and National Records of Scotland.
Contingent fees in relation to non-audit services	No contingent fee arrangements are in place for non-audit services provided.
Gifts and hospitality	We have not identified any gifts or hospitality provided to, or received from, a member of the organisation's board, senior management or staff (that would exceed the threshold set in the Ethical Standard).

We confirm that there are no significant facts or matters that impact on our independence at planning as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. The firm and each covered person have complied with the Financial Reporting Council's Ethical Standard and confirm that we are independent and are able to express an objective opinion on the financial statements.

No non-audit services provided by Grant Thornton UK LLP have been identified. Any changes and full details of all fees charged for audit related and non-audit related services by Grant Thornton UK LLP and by Grant Thornton International Limited network member Firms will be included in our Annual Audit Report at the conclusion of the audit.

10 Communication of audit matters with those charged with governance

Communication of audit matters with those charged with governance

Our communication plan

	Audit Plan	Annual Audit Report
Respective responsibilities of auditor and management/those charged with governance	●	
Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks and Key Audit Matters	●	
Planned use of internal audit	●	
Confirmation of independence and objectivity	●	●
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	●	●
Significant matters in relation to going concern	●	●
Views about the qualitative aspects of the organisation's accounting and financial reporting practices including accounting policies, accounting estimates and financial statement disclosures		●
Significant findings from the audit		●
Significant matters and issue arising during the audit and written representations that have been sought		●
Significant difficulties encountered during the audit		●
Significant deficiencies in internal control identified during the audit		●
Significant matters arising in connection with related parties		●
Identification or suspicion of fraud involving management and/or which results in material misstatement of the financial statements		●
Non-compliance with laws and regulations		●
Unadjusted misstatements and material disclosure omissions		●

ISA (UK) 260, as well as other ISAs (UK), prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table here.

This document, the Audit Plan, outlines our audit strategy and plan to deliver the audit, while the Annual Audit Report will be issued prior to approval of the financial statements and will present key issues, findings and other matters arising from the audit, together with an explanation as to how these have been resolved.

We will communicate any adverse or unexpected findings affecting the audit on a timely basis, either informally or via an audit progress memorandum.

Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance.

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.

11 Appendices

Respective responsibilities

The Code sets out auditor responsibilities and responsibilities of the audited body. Key responsibilities are summarised below. Please refer to the Code for further detail.

National Records of Scotland

Your responsibilities include:

- Maintaining adequate accounting records and working papers
 - Preparing accounts for audit, comprising financial statements, which give a true and fair view, and related reports
 - Establishing and maintaining a sound system of internal control
 - Establishing sound arrangements for proper conduct of affairs, including the regularity of transactions
 - Maintaining standards of conduct for the prevention and detection of fraud and other irregularities
 - Maintaining strong corporate governance arrangements and a financial position that is soundly based
 - Establishing and maintaining an effective internal audit function.
-

External Audit

Our responsibilities include:

- Compliance with the FRC Ethical Standard
 - Compliance with the Code and UK Auditing Standards (ISA's UK) in the conduct and reporting of our financial statements audit
 - Compliance with the Code and guidance issued by Audit Scotland in the conduct and reporting of our wider scope work
 - Providing assurance on specified returns and other outputs (where required), as specified in guidance issued by Audit Scotland
 - Liaison with and notifying Audit Scotland when circumstances indicate a statutory report may be required.
 - Contributing to relevant performance studies (as set out in Audit Scotland's Planning Guidance for 2025/26).
-



New or revised IFRS

The following IFRS Standards and amendments have been recently issued but have not yet been adopted by the FReM.

IFRS 17 Insurance contracts

IFRS 17 replaces IFRS 4. IFRS 17 provides consistent principles for all aspects of accounting for insurance contracts. It removes existing inconsistencies and enables investors, analysts and others to meaningfully compare companies, contracts and industries. It has been effective in the UK since **1 January 2023**.

Amendments to IAS 21 – Lack of exchangeability

IAS 21 has been amended by the IASB to specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. The amendments are effective in the UK from **1 January 2025**.

Amendments to IFRS 9 and IFRS 7 – Classification and measurement of financial instruments

These amendments clarify the requirements for the timing of recognition and derecognition of some financial assets and liabilities, adds guidance on the SPPI criteria, and includes updated disclosures for certain instruments. The amendments are effective in the UK from **1 January 2026**.

IFRS 18 Presentation and Disclosure in the Financial Statements

IFRS 18 will replace IAS 1 Presentation of Financial Statements. All entities reporting under IFRS Accounting Standards will be impacted.

The new standard will impact the structure and presentation of the statement of profit or loss as well as introduce specific disclosure requirements. Some of the key changes are:

- Introducing new defined categories for the presentation of income and expenses in the income statement
- Introducing specified totals and subtotals, for example the mandatory inclusion of ‘Operating profit or loss’ subtotal.
- Disclosure of management defined performance measures
- Enhanced principles on aggregation and disaggregation which apply to the primary financial statements and notes.

IFRS 18 will be effective in the UK from **1 January 2027**.

IFRS 19 Subsidiaries without Public Accountability: Disclosures

IFRS 19 provides reduced disclosure requirements for eligible subsidiaries. A subsidiary is eligible if it does not have public accountability and has an ultimate or intermediate parent that produces consolidated financial statements available for public use that comply with IFRS Accounting Standards. IFRS 19 is a voluntary standard for eligible subsidiaries and is effective in the UK from **1 January 2027**.



© 2026 Grant Thornton UK LLP. All rights reserved.

'Grant Thornton' refers to the brand under which the Grant Thornton member firms provide assurance, tax and advisory services to their clients and/or refers to one or more member firms, as the context requires. Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. GTIL and each member firm is a separate legal entity. Services are delivered by the member firms. GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.