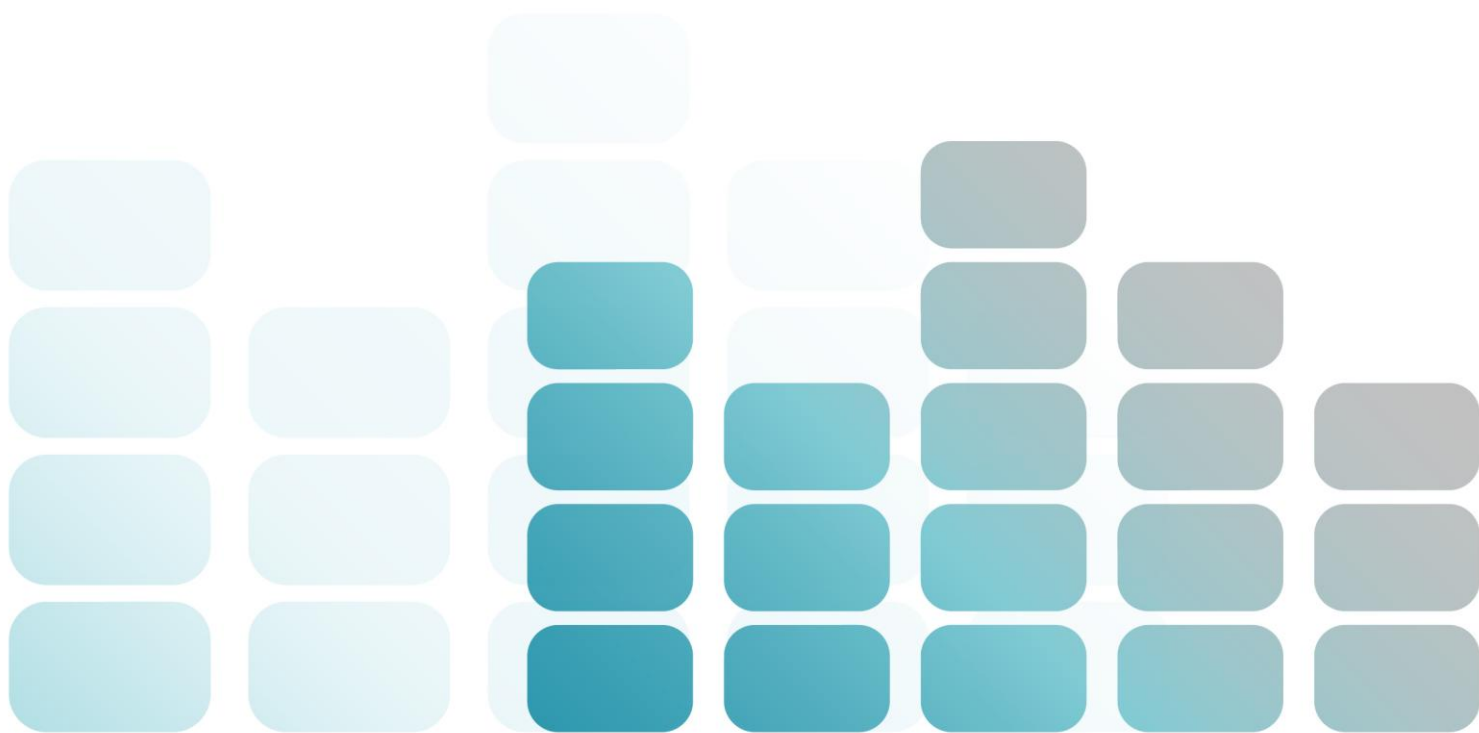


Qualifications Scotland

Annual Audit Plan 2025/26



 AUDIT SCOTLAND

Prepared for Qualifications Scotland
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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 Qualifications Scotland's 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. Michael Oliphant, of Audit Scotland, has been appointed by the Auditor General for Scotland as external auditor of Qualifications Scotland (QS).

3. The audit team is independent of Qualifications Scotland 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 Qualifications Scotland 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 and Staff Report.
- Conclusions on Qualifications Scotland's arrangements in relation to the wider scope areas: Financial Management, Financial Sustainability, Vision, Leadership, and Governance, and Use of Resources to Improve Outcomes.
- Reporting on Qualification Scotland's arrangements for securing Best Value.
- 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 Qualifications Scotland 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 Qualifications Scotland's arrangements in place for the wider scope areas.

Qualifications Scotland's responsibilities

8. Qualifications Scotland 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 the 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 the body are outlined in [Exhibit 1](#).

Exhibit 1

2025/26 Materiality levels for Qualifications Scotland

Materiality	£
Materiality – based on an assessment of the needs of users of the financial statements and the nature of the body's operations, the benchmark used to determine materiality is gross expenditure based on the audited 2024/25 financial statements. Materiality has been set at 2% of the benchmark.	£2.24 million

Materiality	£
Performance materiality – this acts as a trigger point. If the aggregate of misstatements identified during the audit exceeds performance materiality, this could indicate that further audit procedures are required. Using professional judgement, performance materiality has been set at 60% of planning materiality.	£1.34 million
Reporting threshold – all misstatements greater than the reporting threshold will be reported.	£0.12 million

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 Qualifications Scotland, 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, page 8](#). 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 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 management and those charged with governance.

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, such as those affecting revenue and expenditure recognition around the year-end. • 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.
<p>Valuation of property, plant and equipment</p> <p>Qualifications Scotland (as the SQA) held £25.147 million of property, plant, and equipment (PPE) as at 31 March 2025.</p> <p>There is a significant degree of subjectivity in the valuations relating to these assets, and changes in the assumptions can result in material changes to valuations.</p> <p>Without reliable and clear asset records, there is a risk of errors in accounting disclosures, and increased risk of duplications or loss of assets.</p>	<p>The audit team will:</p> <ul style="list-style-type: none"> • Review the appropriateness of the key data and assumptions used in the 2025/26 valuation process, and challenge these where required. • Review changes in the non-current asset process against the agreed actions for the prior year recommendation.

Source: Audit Scotland

Key audit matters

16. The Code of Audit Practice requires public sector auditors to communicate key audit matters. Key audit matters are those, 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.

17. 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.

18. The key audit matters will be communicated in the Annual Audit Report.

Wider scope and Best Value

Introduction

19. 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 broadens the audit of the annual report and accounts to include consideration of additional aspects or risks in four areas, which are summarised below:

- **Financial Management** – this means having sound budgetary processes. Factors that can impact on the body being able to secure sound financial management include the strength of the financial management culture, accountability, and arrangements to prevent and detect fraud, error and other irregularities, bribery and corruption.
- **Financial Sustainability** – this 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 the body's medium to longer-term planning for service delivery.
- **Vision, Leadership and Governance** – this means having a clear vision and strategy, with set priorities within the vision and strategy. This is assessed by considering the clarity of plans in place to deliver the vision and strategy and the effectiveness of the governance arrangements to support delivery.
- **Use of Resources to Improve Outcomes** – this means using resources to meet stated outcomes and improvement objectives through effective planning and working with partners and communities. This is assessed by considering the body's arrangements for ensuring resources are deployed to improve strategic outcomes, meet the needs of service users, and deliver continuous improvement.

20. A conclusion on the effectiveness and appropriateness of arrangements that Qualifications Scotland has in place for each of the wider scope areas will be reported in the Annual Audit Report.

Duty of Best Value

21. 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.

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

23. 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. In addition, auditors are required to carry out a review of the 'fairness and equality' theme at least once during the audit appointment, and this will be carried out later in the audit appointment.

Significant wider scope and Best Value risks

24. The risk assessment process has identified significant risks in the wider scope areas and Best Value as outlined in Exhibit 3, and this includes the planned audit procedures in response to the risks.

Exhibit 3

Significant wider scope and Best Value risks

Description of risk	Planned audit response
<p>Cyber security</p> <p>In 2022/23, we identified there was scope for the predecessor body, SQA, to strengthen cyber security arrangements including putting in place plans to achieve Cyber Essentials accreditation.</p> <p>Progress in relation to achieving this accreditation has been slow. Qualifications Scotland is developing a Cyber Security Roadmap which is expected to be implemented in April 2026 and includes working towards Cyber Essentials accreditation. Risks remain with the continued reliance on legacy systems, and recent incidents in Scotland's public sector demonstrate the significant impact that a cyber attack can have on both the finances and operation of an organisation.</p>	<p>The audit team will:</p> <ul style="list-style-type: none"> Consider the progress made in developing and implementing the Cyber Security Roadmap.

Governance and transition arrangements

Qualifications Scotland became a new non-departmental public body (NDPB) on 1 February 2026.

The organisation is implementing new governance arrangements, processes and policies to reflect its new statutory responsibilities. There is a risk that delays or weaknesses in establishing these new arrangements could impact effective operational planning and delivery.

The annual report and accounts for 2025/26 will encompass activity from both the final months of Scottish Qualifications Authority and the initial period of Qualifications Scotland being operational. There is a risk that disclosures in the annual report and accounts do not accurately reflect this change in statutory functions.

The audit team will:

- Review the governance arrangements for Qualifications Scotland to confirm that appropriate structures, policies and processes are in place.
- Evaluate management's approach to ensuring accurate disclosure requirements for the cessation of the Scottish Qualifications Authority and the commencement of Qualifications Scotland.

Performance Reporting

In our prior year audits of Qualifications Scotland's predecessor body, we recommended that improvements are required to ensure the performance report in the annual report and accounts provides a clear, objective and fair assessment of performance against objectives over the year. This includes clearly identifying areas of underperformance and the actions being taken to address them.

There is a risk that the performance report does not meet the requirements of the Government Financial Reporting Manual (FReM), and guidance on good financial reporting.

The audit team will:

- Review the performance report in the annual report and accounts and evaluate compliance with FReM requirements.

Source: Audit Scotland

Reporting arrangements, timetable and audit fee

Audit outputs

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

- This Annual Audit Plan.
- An Independent Auditor's Report to Qualifications Scotland, the Auditor General for Scotland, and the Scottish Parliament setting out opinions on the annual report and accounts.
- An Annual Audit Report to Qualifications Scotland 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.

26. The matters to be reported in the outputs will be discussed with management 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.

27. Target dates for audit outputs are set by the Auditor General for Scotland. The target date for laying the annual report and accounts is 31 October 2026 for central government non-departmental public bodies.

28. The target date of 31 October 2026 for issuing the Independent Auditor's Report and Annual Audit Report will not be met. This is 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 team are working towards completion of the audit by the later date of 25 November 2026 and are working towards delivering the audit by target dates over the course of the audit appointment.

Audit timetable

29. 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](#) 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 management and reported to those charged with governance, where required.

Exhibit 4

2025/26 audit timetable

Audit activity	QS target date	Audit team target date	Relevant committee date
Issue of Annual Audit Plan		2 March 2026	16 March 2026
Annual report and accounts:			
• Consideration of unaudited annual report and accounts by those charged with governance	24 August 2026		24 August 2026
• Submission of unaudited annual report and accounts and all working papers to audit team	28 August 2026		
• Latest date for audit clearance meeting		30 October 2026	
• Issue of draft Letter of Representation, proposed Independent Auditor's Report, and proposed Annual Audit Report		9 November 2026	16 November 2026
• Agreement of audited and unsigned annual report and accounts	16 November 2026	16 November 2026	
• Approval by those charged with governance and signing of audited annual report and accounts	25 November 2026		25 November 2026
• Signing of Independent Auditor's Report and issue of Annual Audit Report		25 November 2026	

Source: Audit Scotland

Audit fee

30. The audit fee is determined in line with Audit Scotland's fee setting arrangements. The proposed audit fee for the 2025/26 audit is £73,560.

Other matters

Internal audit

31. Qualifications Scotland 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.

32. While we are not planning to place formal reliance on the work of internal audit in 2025/26, we will review internal audit reports and assess the impact of the findings on our financial statements and wider scope audit responsibilities.

Audit quality

33. 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](#).

34. 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.

35. 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.

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

Qualifications Scotland

Annual Audit Plan 2025/26



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