

# **Key Issues Memorandum**

General Register Office for Scotland

For the year ended 31 March 2010

30 July 2010

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To the Accountable Officer, the Audit Committee of the General Register Office for Scotland (GROS), and the Auditor General for Scotland

The purpose of this memorandum is to highlight the key issues affecting the results of GROS and the preparation of the financial statements for the year ended 31 March 2010. It is also used to report to management to meet the mandatory requirements of International Standard on Auditing (UK & Ireland) 260.

We take responsibility for this memorandum, which has been prepared on the basis of the limitations set out in 'The small print'.

We would like to take this opportunity to record our appreciation for the kind assistance provided by the Accountable Officer and her staff during our audit.

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# 1 Executive summary

Financial statements	
Audit opinion	We intend to give an unqualified opinion on both the financial statements of GROS for 2009-10 and on the regularity of transactions undertaken during the financial year.
Financial statements	• The draft financial statements and supporting working papers were of a good standard. Adjustments made to the draft accounts following our audit decreased net operating expenditure by £0.173 million.
IFRS conversion	• We carried out a review of the draft 2009-10 IFRS accounts against the requirements of the iFReM. The annual accounts are IFRS compliant.

Governance	
Change in Accountable Officer	• We found that the arrangements to ensure a smooth transition to the new Accountable Officer worked effectively.
National performance reports	GROS has appropriate arrangements for considering Audit Scotland national performance reports.
2011 Census	• Arrangements for delivery of the 2011 Census are progressing satisfactorily, but the 2010-11 year will be key to ensuring a successful outcome.

Performance and best value	
Efficiencies	• GROS exceeded its efficiency savings targets for the year by £0.631m.
Performance	• The new Accountable Officer has made improvements to performance management and reporting during the year. Further work is, however, required to develop performance reporting.

Looking forward	
Financial position	• Like all public sector bodies, GROS will be required to operate within strict financial constraints over the coming year. GROS needs to ensure that it continues to monitor costs closely, scenario plan and be ready to respond quickly to changes in circumstances.

## 2 Financial reporting

#### 2.1 Net operating costs

Summary operating cost statement	Actual	Actual	Budget	
	2009	2010	2010	
	£'000	£'000	£'000	
Staff Costs Administration expenditure Administration income Operating Income	9,141	10,017	10,067	
	9,852	8,400	8,652	
	(4,649)	(4,698)	(4,752)	
Total net expenditure	14,344	13,719	13,967	

#### Comparison to budget:

In 2009-10, GROS's expenditure was within the regularity limit at £0.248 million (2%) below its budget of £13.967 million.

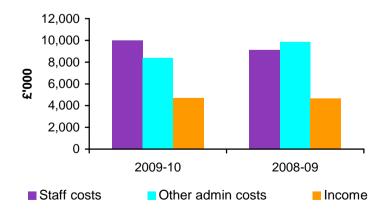
This result has been achieved through a reduction in staff costs of £0.050 million due to delays in filling vacant posts, a decrease in supplies and services of £0.320 million due to an underspend on IT projects, caused in part by not having staff in post to carry out the work. These savings have been offset by lower than expected income from the ScotlandsPeople Centre service by £0.112 million. Income from this service would actually have been higher than budget but for an unplanned VAT charge of approximately £0.200 million made by the supplier of the ScotlandsPeople website.

#### Comparison to 2008-09:

Net expenditure has reduced by 4.34% or £0.625 million compared to 2009-10.

Staff numbers were planned to increase in 2009-10 due to the increasing work around the 2011 Census. Staff costs have actually increased by £0.876 million as a result of increasing staff numbers, together with a pay rise averaging 4.5%. But there has been a reduction in other administration costs of £1.452 million which is due to the high level of costs incurred in the build up to the 2011 Census during 2008-09, particularly around arrangements for the Census rehearsal during that year.

#### Expenditure 2009-10 to 2008-09



#### 2.2 Financial position

Balance sheet	2010 £'000	2009 £'000
	£ 000	£ 000
Non current assets	9,145	9,598
Current assets	1,005	1,558
Current liabilities	(2,433)	(900)
Provisions for liabilities and charges	(240)	(215)
Total net assets	7,477	10,041
General fund	4,041	6,341
Revaluation reserve	3,436	3,700
Total taxpayers' equity	7,477	10,041

Non current assets have decreased by £0.453 million. Additions were £0.631 million, depreciation £0.994 million, indexation uplift £0.132 million and a downwards revaluation of £0.222 million. The additions were mostly in respect of computer equipment, software and software licences. The revaluation adjustment was in respect of Station Road and New Register House and arose due to professional valuations being obtained as part of the 5 year rolling valuation programme.

Current assets at 31 March 2010 are £0.553 million less than at 31 March 2009. This is due to the timing of a rental payment on Ladywell Road, a lower VAT debtor this year and only 2 months accrual for income from Brightsolid this year compared to 3 months last year.

Current liabilities at 31 March 2010 are £1.533 million higher than as at 31 March 2009. There are significant creditors and accruals this year in respect of the 2011 Census programme.

Provisions are in respect of GROS's liability for payments to people who have left under early retirement provisions.

The general fund has decreased because of the high current liabilities at the year end, meaning that the cash funding requirement was lower than net expenditure.

General Fund	2010	2009	
	£'000	£'000	
Balance at 31 March 2009 as restated	6,341	4,027	
Non cash charges	536	448	
Net operating cost for the year	(13,718)	(14,344)	
Net funding	10,882	16,210	
Balance at 31 March 2010	4,041	6,341	

The decrease in the revaluation reserve is in respect of the downward revaluation on properties of £0.222 million less indexation of £0.132 million on other assets, plus depreciation of £0.174 million on the revalued proportion of all assets.

#### 2.3 Conclusion

Overall GROS has managed its finances well. It has been impacted by lower than expected progress in delivering IT projects, largely due to difficulties in recruiting suitably qualified staff. In addition, income from providing website access to its registers has declined due to changes in the contract with its website provider. Contract negotiations remain ongoing and are expected to be resolved in the next financial year.

### 3 Financial statements

#### **Findings and conclusions**

GROS is required to produce financial statements under an Accounts Direction issued by the Scottish Ministers. The Accounts Direction requires GROS to prepare its financial statements in line with the accounting principles and disclosure requirements of the 2009-10 iFReM.

We audit the financial statements and give an opinion on whether they give a true and fair view. Our opinion also covers whether the expenditure and receipts shown in the financial statements were incurred or applied in accordance with any applicable enactments and guidance issued by the Scottish Ministers.

We also review the Statement on Internal Control and consider GROS's compliance with Scottish Government guidance, the adequacy of the process put in place by the Accountable Officer to obtain assurances on systems of internal control and we assess whether disclosures in the Statement are consistent with the information emerging from our normal audit work.

As part of our 2009-10 interim audit, we assessed the adequacy of GROS's financial systems in respect of:

- fixed assets
- employee remuneration
- budgetary control and financial management.

We found that key financial systems are generally operating effectively. We made ten recommendations for improvements in our interim management report issued in March 2010. Only one of these was considered to be high risk - the risk of delaying expenditure to future years. Please refer to the interim report for our full conclusion.

During our audit of the financial statements, we have made a few additional minor recommendations which have been reported separately to management.

The draft financial statements and supporting working papers were presented for audit prior to the fieldwork in accordance with our agreed timetable and were of a good standard.

We intend to give an unqualified opinion on both the financial statements of GROS for 2009-10 and on the regularity of transactions undertaken during the financial year.

### 3.1 Matters identified at the planning stage

Specific issue identified in our Audit Approach Memorandum	Auditor Response
<b>IFRS</b> implementation This is the first full year in which central government bodies are required to prepare their accounts on the basis of IFRS. GROS began its preparations for this process in 2008 by restating the 2007-08 balance sheet, and again in December 2009 by preparing shadow accounts for 2008-09. We reviewed and reported on the 2008-09 shadow accounts in February 2010.	We have carried out a comprehensive review of the draft 2009-10 accounts, prepared under IFRS, against the requirements of the 2009-10 iFReM. There were some minor corrections which we have notified to management and no material errors in presentation were identified.
NHSCR register GROS has a statutory duty to maintain the National Health Service Central Register and has a financial objective to break-even on the provision of this service. GROS did achieve an operating profit of £0.106 million in 2009-10 against a budgeted surplus of £0.063 million, with savings being made from renegotiated NHS IT support arrangements and additional income from researchers, but did report an operating loss in each of the previous two years -£0.058 million 2008-09 and £0.259 million for 2007-08.  However, the level of income, currently at £1 million per annum is likely to be reduced by 7% from 2010-11. Management are therefore undertaking a review to determine the effect this will have on their ability to maintain the Register without a reduction in level of service.	Management are aware of the requirement to break-even and monitor the memorandum trading accounts at each budget revision stage during the year. We also note that management are considering how to ensure continued break-even for 2010-11 onwards.

Specific issue identified in our Audit Approach Memorandum	Auditor Response
<ul> <li>ScotlandsPeople Centre Service (SPC service) The SPC service includes the ScotlandsPeople website as well as the ScotlandsPeople Centre (SPC) for which 2009-10 was its first full year of operation. The SPC service is run in partnership with the National Archives of Scotland and the Court of the Lord Lyon. We had identified two risks in relation to the SPC: <ul> <li>a risk that net costs could exceed income, as the necessary information to budget or assess performance was not available</li> <li>a risk that the various partners had different expectations from the SPC as no Memorandum of Understanding had been formally signed.</li> </ul> </li> </ul>	<ul> <li>GROS management have addressed both of these risks:</li> <li>a budget for the SPC service was set and a memorandum trading account (MTA) has been produced and compared to the budget. Although this MTA produced a small deficit (£9k) across all three partners, the SPC service in relation to GROS realised a surplus of £0.308 million compared to a budgeted surplus of £0.431 million. Income from the service actually increased against budget, but there was an unforeseen additional VAT charge of £200k in relation to the website service, which is itself discussed in 3.2 below.</li> <li>the Memorandum of Understanding for the SPC has now been signed.</li> <li>We will continue to monitor this service and include it in our audit plan for 2010-11.</li> </ul>

3.2 Matters identified during the course of the audit

	Issue	Auditor response
1	VAT: Brightsolid contract In 2002, GROS, the National Archives of Scotland and the Court of the Lord Lyon (the partners) jointly entered into a contract with Scotland Online (now Brightsolid) to provide pay per view internet services giving access to the general public to a range of information that they hold in their registers and archives. On this basis, Brightsolid paid the partners a fee each month, which was calculated by Brightsolid at the rates agreed in the contract on the total income received by Scotland Online. No VAT was ever charged on the services provided by Brightsolid. The fee was split such that GROS received 95% of the total, the remainder going to the other partners.  However, during 2009 Brightsolid began charging VAT on the cost element of the contract (approx £23k per month for 10 months in 2009-10). HMRC have advised GROS that it is not able to recover the VAT, adversely impacting the operating cost statement in the period.	The current VAT position for all partner organisations and Brightsolid has yet to be resolved. We have recommended that GROS seek legal advice as to the contractual position on both the old and the new contracts.  We have requested further disclosure of the contractual issue in the notes to the accounts. We have also included a paragraph confirming the current contractual position in our letter of representation that we ask the Accountable Officer to sign.  We will follow up the outcome from this issue as part of our 2010-11 audit.

## 4 Audit adjustments

#### 4.1 Adjusted items

The net impact of adjusted audit differences is a decrease in total expenditure of £0.173 million.

All adjusted items are set out in 4.3 below.

#### 4.2 Unadjusted items

The aggregate impact of unadjusted items on the operating cost statement, were they to be processed, would result in an additional £98k reduction in net operating costs. This is below our level of audit materiality.

All unadjusted items are set out in 4.4 below.

#### 4.3 Adjusted items

Journal reference	Description	Balance sheet	Balance sheet	Operating cost statement	Operating cost statement	Outturn effect	Adjusted Y/N	Description
		Dr	Cr	Dr	Cr	cr +ve		
-	Dr Prepayments	150,351						Being client adjustment for prepayments not
	Cr Supplies & Services OCS				150,351	150,351	Y	made
	2 Dr Accrued Income	21,385					Y	Being increase to Feb 2010 ScotlandsPeople
	Cr Income - Fees & Charges (Internet)				21,385	21,385		income based on Bright Solid invoice
3	B Dr Accrued Income	25,740					Y	Being increase to Mar 2010 ScotlandsPeople
	Cr Income - Fees & Charges (Internet)				25,740	25,740		income
4	Dr other debtors	101,662					Y	Being gross up of credit balance on other
	Cr accruals		101,662					debtors
	Dr Accrued income	15,777					Y	Being adjustment in respect of SPC income for
	Cr Income				15,777	15,777		March
(	Dr Operating costs Accommodation			40,344		(40,344)	Y	Being client adjustments in respect of late
	Dr Assets	22,034						received invoices
	Cr Accruals		62,378					
Outturn		336,949	164,040	40,344	213,253	172,909		

4.4 Unadjusted items

Journal reference	Description	Balance sheet	Balance sheet	Operating cost statement	Operating cost statement	Outturn effect	Adjusted Y/N	Reason for not adjusting
		Dr	Cr	Dr	Cr	cr +ve		
1	Dr Supplies & Services OCS			4,639		(4,639)	N	Not materia
	Cr Prepayments		4,639			, ,		
	Being adjustment for DELL Pro Support	Prepayments ca	alculated incor	rectly				
2	Pr Accumulated Depr'n	37,567					N	Current policy is to depreciate over 3 years
	Cr P&L Depreciation	1			37,567	37,567		will review policy going forward
	Being effect of capitalisation over 5 years	rather than 3 f	or SAS softwa	re	,	,		
3	Dr Accruals	20,900					N	Not materia.
	Cr Fixed Assets	1	20,900					
	Being adjustment for Dell equipment which	ch was delivere						
4	Dr Debtors	4,188					N	Not materia.
	Cr creditors		4,188					
	Being adjustment in respect of debit bala	nce ( BT ) on cr	reditors ledger					
5	Dr accruals	47,070						
	Cr payroll expense				47,070	47,070	N	Not materia
	Being unreconciled difference between p	ayroll reports a	nd ledger					
6	Dr staff costs			7,397		(7,397)	N	Not materia.
	Cr flexitime accrual		7,397					
	Being adjustment in respect of employee	benefit accrual	<u> </u>					
7	Dr Holiday pay accrual	25,611						
	Cr staff costs				25,611	25,611	N	Not material
	Being adjustment in respect of employee	benefit accruai						
Outturn		135,336	37,124	12,036	110,248	98,212		

Journal	Description	Balance sheet	Balance sheet	Operating cost	Operating cost	Outturn effect	Adjusted	Reason for not adjusting
reference				statement	statement		Y/N	
		Dr	Cr	Dr	Cr	cr +ve		
	PYA Adjustment							
1	Dr Holiday pay accrual	19,552						
	Cr staff costs				19,552	19,552	N	Not material
	Being adjustment in respect of employee benefit accrual							
Outturn		19,552	0	0	19,552	19,552		

### 5 Governance

#### 5.1 Introduction

Corporate governance is the system by which organisations direct and control their functions and relate to their stakeholders, and incorporates the way in which an organisation manages its business, determines strategy and objectives and goes about achieving those objectives. It is concerned with structures and processes for decision-making, accountability, control and behaviour at the upper levels of the organisation.

#### 5.2 Audit Approach

As part of our 2009-10 interim audit, we assessed the adequacy of GROS's governance arrangements against good practice standards for the public sector in respect of:

- risk management procedures
- audit committee arrangements

We found that GROS has a strong system of corporate governance and there is evidence of transparent decision-making, based on a good understanding of risks to the organisation. We made two recommendations for improvements in governance in our interim management report issued in March 2010 - neither of these were considered high risk.

The following table sets out additional matters covered during our audit of the 2009-10 financial statements.

#### 5.3 Matters identified at the planning stage

3.5 matters identified at the planning stage	
Specific issue identified in our Audit Approach Memorandum	Auditor Response
Change in accountable officer	A new permanent Accountable officer was appointed in March 2010 and
The Deputy Registrar General, was appointed as interim accountable officer	we conclude that the procedures followed to ensure a smooth transition
when the previous Accountable Officer was seconded to the Scottish	were adequate and appropriate. These included a handover period from
Government's Health Directorate.	the temporary (outgoing) Accountable Officer and full briefing from the
	Strategic Management Team.
We perceived a potential governance risk surrounding management	
continuity in the transition period which was mitigated by the temporary	
accountable officer's knowledge of the business and involvement in the 2011	
Census Project.	

Specific issue identified in our Audit Approach Memorandum	Auditor Response
Audit Scotland national performance reports Audit Scotland require auditors to provide feedback to them on the response by public bodies to national performance reports. Where we find that GROS has not adequately considered a relevant national study report and/or has not prepared an action plan to implement relevant recommendations, we would discuss this with you and make recommendations where appropriate.	We found that GROS has procedures which ensure that relevant national performance reports are discussed at board and audit committee meetings and that action plans are prepared if required. We submitted a progress report to Audit Scotland in February 2010 in line with this conclusion, and are required to submit a further report by 31 August 2010. The national performance report of most relevance that has been published recently is "Improving Public Sector Efficiencies" published in February 2010 and we will expect GROS will have considered this study by the time of our final report to Audit Scotland.
<b>2011 Census</b> GROS is responsible for delivering the 2011 Census. A total budget of £65 million has been allocated by the Scottish Government and the Department faces reputational risk if it fails to deliver the Census efficiently, effectively, on time and on budget.	We reviewed this during our interim audit and again at our final audit. Gateway reviews continue to give positive assurance that the project is progressing as intended. However, the next period will be crucial in the build up to the Census next year and we will again include a review of progress in our 2010-11 audit plan.

5.4 Matters requiring follow-up from our interim audit

Issue identified for follow-up	Management Response
Business continuity review In December 2009, GROS was in the process of performing a business continuity review in order to address any weaknesses in advance of the 2011 Census.	Due to other priorities, work on business continuity stalled during last year but plans are in place to complete this work in 2010-11 and we will include a review of progress in our 2010-11 audit plan.
Audit committee arrangements We recommended that the audit committee refers to a new guide published in January 2010 by The National Audit Office when considering the adequacy of disclosures made in the Statement of Internal Control.	This guide was included within the papers for the audit committee meeting held on 23 June 2010.

### 6 Performance and best value

#### 6.1 Introduction

All public bodies in Scotland have a duty to secure Best Value and continuous improvement. The public sector is facing a period of significant financial austerity with budget cuts likely to be in the region of 15-20% in real terms by 2013-14. In many areas this means that current levels of service provision may be unsustainable. Public pressure to deliver services as efficiently and cost effectively as possible means that being able to demonstrate that the organisation delivers Best Value is more important than ever.

As part of our interim 2009-10 audit carried out in December 2009, we reviewed GROS's arrangements for:

- ensuring Best Value
- delivering efficiencies.

We found that GROS has generally good arrangements to demonstrate that it is achieving Best Value and to deliver efficiency savings. Three recommendations were made in our interim report, but none of these were considered high risk.

The following table sets out additional matters covered during our audit of the 2009-10 financial statements.

Specific issue identified in our Audit Approach Memorandum	Auditor Response
Efficiency savings The Scottish Government has set GROS a target to achieve £0.167 million in efficiency savings each year from 2008-09 to 2010-11.	We have reviewed the Efficiency Return for 2009-10 which states that GROS has exceeded the target efficiency savings of £0.167m by £0.631m. Efficiencies of £0.047 have been achieved in asset management, and efficiencies of £0.751 achieved in procurement, with £0.670 million of the total being non-recurring. Efficiencies will become more difficult to achieve in the future due to budget constraints and GROS will need to plan for ways of obtaining new efficiencies. We will continue to monitor this area in our 2010-11 audit.

Specific issue identified in our Audit Approach Memorandum	Auditor Response
Performance Our review of GROS's Key Performance Indicators for 2008-09 noted that performance indicators tended to be input focussed, and that there was scope for further development of outcome, output and impact performance measures.	Our 2009-10 interim report noted that "although two of GROS's strategic objectives refer to meeting customers needs, none of the targets or key performance indicators relate to customer satisfaction or feedback. A corporate, targeted approach to obtaining customer feedback may help GROS ensure that user needs are addressed on a more systematic basis."  We will include a review of progress on this recommendation in our 2010-11 audit plan.  However, the new Accountable Officer is already making some changes to the way in which information is presented to stakeholders. For example, GROS is no longer publishing a separate Annual Performance Review. Instead, the joint Annual Report and Accounts covers high level information about objectives, governance arrangements, achievements and future developments. The full report on Key Business Objectives (KBO) and outcomes will be published on GROS's website. This document will combine all the individual KBOs and
	Performance Measures (over 60) as well as information about each branch.

## 7 Looking forward

GROS is carrying out a full Census in 2011 and has been preparing for this for several years with an overall budget £65 million over the whole term of the project. Census preparation will be the central focus during 2010-11 and it will be important to ensure that all timetables and milestones continue to be met.

However, planning for the public sector funding cuts of 15-20% over the three years from April 2011 will also need to remain as a key planning priority.

We noted, in our interim report, that Scottish Government had already requested savings of £2 million for 2010-11 and this was reviewed during GROS's 2009-12 corporate planning process with management considering the possibility of moving milestones into 2011-12 to push expenditure back in order to ease budget pressures. There is a significant risk that delaying expenditure could mean that the eventual costs will be

higher due to inflationary pressures or that adequate budget resources will no longer be made available.

GROS traditionally has reported an underspend against budget. This has an upwards impact on Scottish Government budgeting as well as a possible future downwards effect on the budget allocation awarded to GROS. Management should ascertain why GROS regularly comes under budget and use this knowledge when preparing budgets in future years.

GROS must scenario plan to be prepared for the eventual level of cuts that it will be required to make. Scenario planning will enable GROS to react to events more quickly and ensure management are better prepared to respond to future financial challenges.

## 8 The small print

ISAUK 260 requires communication of:

- relationships that have a bearing on the independence of the audit firm and the integrity and objectivity of the engagement team
- nature and scope of the audit work
- the form of reports expected

#### **Purpose of memorandum**

This Key Issues Memorandum has been prepared for the benefit of discussions between Grant Thornton, the Audit Committee and the Board of management.

The purpose of this memorandum is to highlight the key issues affecting the results of GROS and the preparation of the organisation's financial statements for the year ended 31 March 2010.

This document is also used to report to management to meet the mandatory requirements of International Standard on Auditing (UK & Ireland) 260.

We would point out that the matters dealt with in this report came to our attention during the conduct of our normal audit procedures which are designed primarily for the purpose of expressing our opinion on the financial statements of the organisation.

This memorandum is strictly confidential and although it has been made available to management to facilitate discussions, it may not be taken as altering our responsibilities to the organisation arising under the Code of Audit Practice.

The report will be submitted to the Auditor General for Scotland and will be published by him on his website at www.audit-scotland.gov.uk.

# Responsibilities of the Accountable Officer and auditors

The Board and Accountable Officer are responsible for the preparation of the financial statements and for making available to us all of the information and explanations we consider necessary. Therefore, it is essential that the Board and Accountable Officer confirm that our understanding of all the matters in this memorandum is appropriate, having regard to their knowledge of the particular circumstances.

# Clarification of roles and responsibilities with respect to internal controls

GROS's management is responsible for the identification, assessment, management and monitoring of risk, for developing, operating and monitoring the system of internal control and for providing assurance to the Board and Accountable Officer that it has done so.

The Board and Accountable Officer are required to review the organisation's internal financial controls. In addition, they are required to review all other internal controls and approve the statements included in the annual report in relation to internal control and the management of risk.

The Board and Accountable Officer should receive reports from management as to the effectiveness of the systems they have established as well as the conclusions of any testing conducted by internal audit or ourselves.

We have applied our audit approach to document, evaluate and assess your internal controls over the financial reporting process in line with the requirements of auditing standards.

Our audit is not designed to test all internal controls or identify all areas of control weakness. However, where, as part of our testing, we identify any control weaknesses, we will report these to you.

In consequence, our work cannot be relied upon to disclose defalcations or other irregularities, or to include all possible improvements in internal control that a more extensive special examination might identify.

#### Independence and robustness

Ethical standards require us to give you full and fair disclosure of matters relating to our independence.

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Auditing Practices Board's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.

In accordance with best practice, we analyse our fees below:

	incl VAT
Grant Thornton UK LLP	50,000
Audit Scotland fixed charge	5,800
Total	55,800

In addition, Grant Thornton are currently providing VAT support to GROS in relation to an issue with the website service and have agreed a fee of £5,287 including VAT.