



# The Office of the Accountant in Bankruptcy (AiB)

**External Audit Plan for the financial year  
ending 31 March 2020**

Final Audit Plan to Accountable Officer and Those Charged  
with Governance

28 February 2020

**Joanne Brown**  
Engagement Leader

**John Boyd**  
Senior Manager



# Our audit at a glance



Performance materiality is set at 75% of overall materiality. This is consistent with the prior year reflecting our audit knowledge and understanding with no material adjustments in the prior year.



Our audit planning materiality for the Account in Bankruptcy (AiB) is set at **£200,000**, being approximately 2% of revenue (non-Scottish Government funding) based on 2019/20 budget. This is based on our assessment of what misstatement either individually or in aggregate could be significant as to be misleading to the users of financial statements. Our materiality benchmark is revenue, which we consider a suitable benchmark for AiB. We will apply a lower materiality threshold on review of the Remuneration and Staff report to ensure that remuneration has been disclosed within appropriate bandings (being **£2,500**). We will revisit our materiality throughout our audit including updating to reflect the unaudited financial statements.



Significant audit risks are: management override of controls; risk of fraud in revenue recognition as set out in International Standards on Auditing (ISAs UK); and, the risk of fraud in expenditure recognition as set out in Financial Reporting Council's (FRC) Practice Note 10.

An audit  
underpinned by  
quality and adding  
value to you



Our audit is undertaken in accordance with the Audit Scotland Code of Audit Practice and reflects the wider scope nature of public audit. In accordance with Audit Scotland guidance, we consider AiB to be a smaller body for the purposes of wider scope responsibilities. Therefore the focus of our audit work will be on [financial sustainability](#) and [governance statement disclosures](#).



AiB's Corporate and Business Plan details AiB's corporate objectives between 2018-20. The Plan recognises the financial pressures and challenges facing the organisation. The volume of operational activity reflects a number of societal and economic factors including the overall level of debt. With the AiB not anticipating increases in revenue grant funding in 2019/20, the organisation is looking to meet pressures through operating efficiencies.

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# Overarching principles of our audit

Our audit is risk based and undertaken in accordance with the International Standards on Auditing (ISAs) (UK) and the Audit Scotland Code of Audit Practice 2016 ('the Code'). Our overall objective is a effective, quality-focused external audit which adds value through wider insights and challenge. Our audit foundations are:

- ✓ professional scepticism
- ✓ a focus on audit risks and key areas of management judgement
- ✓ Delivering a quality audit through our experienced public sector audit team, use of data analytics to focus our audit and understanding of the organisation
- ✓ clear and upfront communications, with regular communication during the year
- ✓ reporting with focused actions which will support you in improving your controls/operations

## External Audit plan

The External Audit Plan summarises our responsibilities in accordance with ISAs and the Code:

- Respective responsibilities;
- Our audit process and timeline
- Materiality
- Our risk based audit approach to the audit of the financial statements

## Continuous improvement and adding value

Our aim is to add value to the AiB through our external audit work. This will be delivered through delivering a high-quality audit. Specifically for the AiB we will also undertake the following arrangements:

**Continuous learning and development:** We have discussed with Management opportunities to develop our audit approach to ensure we deliver an efficient and effective audit approach. We will have further discussions with the finance team to discuss the financial statements and the supporting information we will require during our audit. We aim to learn lessons from prior year, in particular ensuring timely review of the draft financial statements and audit report.

**Robust and effective audit methodology:** Our ISA compliant audit methodology is tailored to focus audit resource on significant risk areas and key estimates and judgements as reflected in this audit plan.

## Audit appointment

The Auditor General for Scotland is an independent Crown appointment, made on the recommendation of the Scottish Parliament. The Auditor General is independent and not subject to control of any member of the Scottish Government or the Parliament. The Auditor General is responsible for securing the audit of the Scottish Government and most public bodies, including AiB, and reporting on their financial health and performance.

Audit Scotland is an independent statutory body that provides the Auditor General with the services required to carry out her statutory functions, including monitoring the performance of auditors through a quality control process.

The Auditor General has appointed Grant Thornton UK LLP as external auditor of AiB for the five year period 2016/17 to 2020/21.

## Our team

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The audit will be supported by a team of qualified and part qualified accountants from our public sector audit team. Where required we will use other audit experts, including Public Sector technical accounting team to support our audit.

# Respective responsibilities

As set out in the Code of Audit Practice there are a number of key responsibilities you as an organisation are responsible for, and others, as appointed auditors we are responsible for. These are summarised below:

Area	Accountable Officers Responsibilities
Corporate governance	<ul style="list-style-type: none"> <li>Establishing arrangements for proper conduct of its affairs</li> <li>Legality of activities and transactions</li> <li>Monitoring adequacy and effectiveness of arrangements (inc role of those charged with governance)</li> </ul>
Financial statements	<ul style="list-style-type: none"> <li>Preparing financial statements which give a true and fair view of their financial position</li> <li>Maintaining accounting records and working papers</li> <li>Putting in place systems of Internal Control and maintaining proper accounting records</li> <li>Preparing and publishing an annual governance statement, management commentary and remuneration report</li> <li>Effective systems of internal control as well as financial, operational and compliance controls – supporting achievement of objectives and secure value for money</li> </ul>
Financial position	<ul style="list-style-type: none"> <li>Proper arrangements to ensure financial position is soundly based and responsibility to ensure arrangements secure Value for Money</li> </ul>
Fraud and error	<ul style="list-style-type: none"> <li>Establishing appropriate arrangements for prevention and detection of fraud, error, irregularities, bribery and corruption and affairs are properly managed</li> </ul>

## Our responsibilities



- Undertake statutory duties and comply with professional engagement and ethical standards
- Provide an ISA compliant opinion on financial statements and where appropriate regularity of transactions
- Review and report on, as appropriate, other information eg annual governance statements, management commentary, remuneration reports
- Notify the Auditor General when circumstances indicate a statutory report may be required
- Demonstrate compliance with wider public audit scope in accordance with Audit Scotland's Code of Audit Practice and applicable guidance
- Contributing to Audit Scotland Performance Reports
- Providing regular updates to Audit Scotland to share awareness of current issues across our audit clients
- Notify Audit Scotland of any cases of money laundering or fraud
- Contribute to Audit Scotland technical guidance

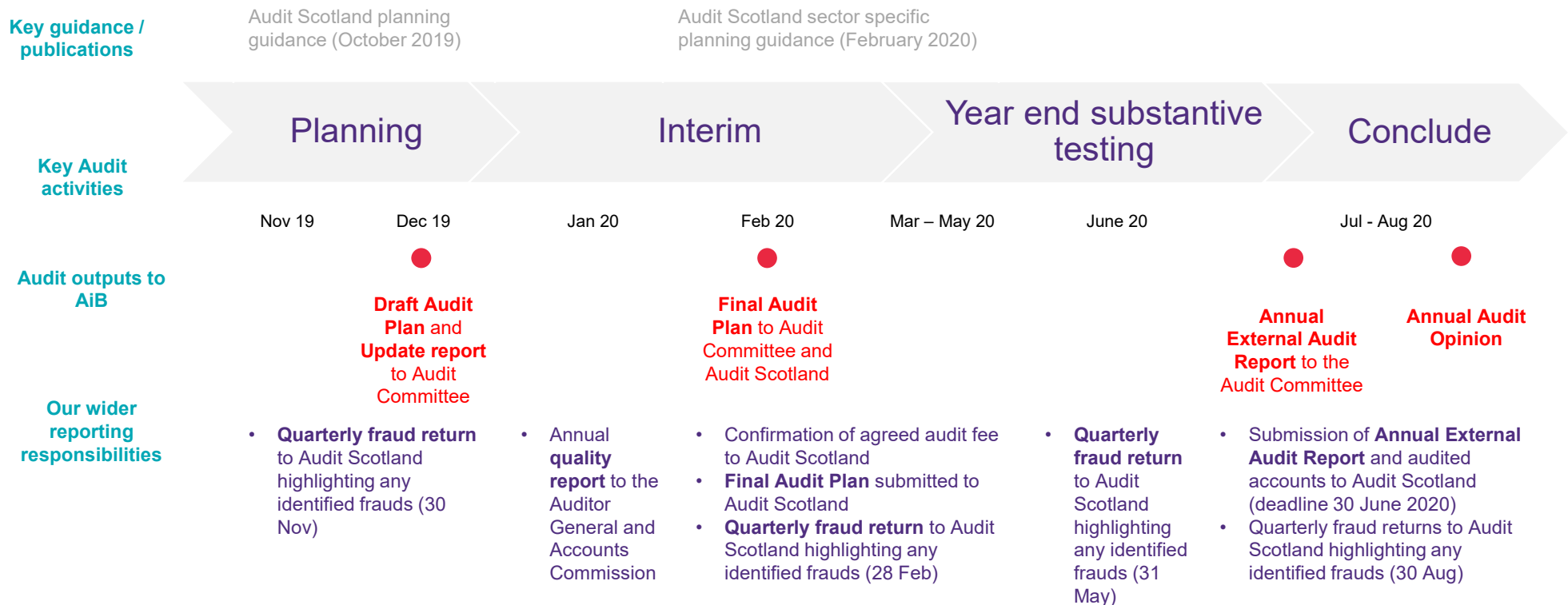
## How do we do this in practice



- By reviewing and providing judgements and conclusions on the AiB's arrangements including those in relation to financial sustainability and governance statement as applicable to smaller bodies
- Financial position and arrangements for ensuring financial sustainability in the medium to longer term
- Review of other information in line with our knowledge and understanding of the AiB
- Ongoing dialogue and engagement with Audit Scotland during the year
- Providing quarterly fraud updates to Audit Scotland and information on any money laundering
- Support Audit Scotland through engaging in technical guidance publications

# Audit process and timeline

Our planned audit timeline is detailed below. In accordance with the Code of Audit Practice and audit Scotland Planning Guidance, we are required to undertake and report on a range of areas. The diagram below summarises our planned audit timetable for 2019/20, and output both to the AiB and Audit Scotland.



Throughout the audit process there will be continuous communication and engagement. We will also continue to engage with Audit Scotland to ensure they are aware of any current or emerging issues at AiB.

# Materiality



We undertake your audit in accordance with International Standards on Auditing (UK) (ISAs) and the Audit Scotland Code of Audit Practice (May 2016). On an annual basis we are required to give an opinion as to whether the Financial Statements:

- give a true and fair view
- have been properly prepared in accordance with relevant legislation and standards
- audited parts of the remuneration and staff report have been prepared in accordance with the guidance
- regularity of expenditure and income
- the wider information contained in the financial statements e.g. Accountability Report; Directors Report and Governance Statement is consistent with our audit knowledge and the financial statements

## Basis for materiality

We determine financial statement materiality based on a proportion of the total operating expenditure. This approach is consistent with our prior year materiality determination. We have determined the AiB's materiality to be **£200,000**, which equates to approximately **2%** of your budgeted total operating income (non-Scottish Government resource funding) for the year.

## Performance materiality

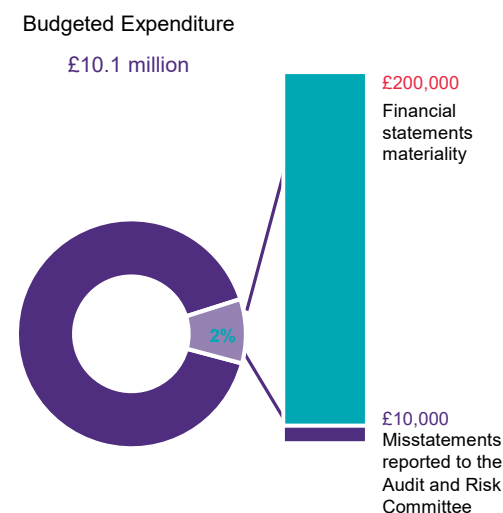
Performance materiality represents the amount set for the financial statements as a whole to reduce the probability that the aggregate of uncorrected and undetected misstatements exceed materiality. Based on our audit experience we have retained this for 2019/20 at **75%**, being **£150,000**. Performance materiality determines those accounts which testing will be undertaken on and the level of sample testing performed where applicable. Performance materiality is set at 75% of overall materiality. This is consistent with the prior year reflecting our audit knowledge and understanding with no material adjustments in the prior year.

Our materiality reflects our professional judgement of the magnitude of an omission or misstatement that, individually or in the aggregate, could reasonably be expected to influence the economic decisions of the users of the financial statements. We will apply a lower materiality threshold on review of the Remuneration and Staff report to ensure that remuneration has been disclosed within appropriate bandings (being **£2,500**).

We will update our materiality based on the unaudited 2019/20 financial statements. During the course of our audit engagement, we will continue to assess the appropriateness of our materiality.

## Reporting to those charged with governance

Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work. Under ISA 260 (UK) 'Communication with those charged with governance', we are required by auditing standards to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. We have determined this threshold to be **£10,000**, being 5% of materiality.



# A risk based audit methodology

A core part of audit planning is understanding AiB and the wider environment in which it operates. This is our fourth year as the external auditors of AiB appointed under the Audit Scotland framework. Through our audit planning procedures we consider a range of factors to assess the risk of material misstatement to the financial statements. 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. Our risk assessment includes the following:

Consideration of critical accounting estimates including provider accrual and provisions

Assessment of inherent risk factors including changes in the organisation's activities and environment

Understanding of entity level controls and the control environment, including IT controls

Financial and operational performance during the year, including pressures in delivering outcomes while operating within financial resources including: fees and charges; recoveries; and parliamentary funding.

## Identified Significant risks

- Risk of fraud in Revenue recognition
- Risk of fraud in expenditure recognition
- Management override of controls

We continue to assess the risk of material misstatement and our response to these risks throughout our audit. Within our Annual Audit Report we will report to you the conclusions from our audit procedures over these risks, including any further risks identified or changes to our planned audit response.



# Significant financial statement risks

## Understanding AiB

AiB's Corporate and Business Plan details AiB's corporate objectives between 2018-20. The Plan recognises the financial pressures and challenges facing the organisation. The volume of operational activity reflects a number of societal and economic factors including the overall level of debt. AiB use trend analysis to forecast caseload volumes and thus operational (and revenue) forecasts. In addition, financial plans recognise other pressures including inflation and pay pressures.

For 2019-20 AiB the Scottish Government budget allocation has reduced by £0.1m in resource and £0.2m in capital requirements. To offset the reduction in budget, AiB has targeted the delivery of efficiency savings, including through management of staff numbers and procurement and contract management arrangements to meet financial targets. As part of AiB's wider strategic planning, the organisation continues to look to automate case management processes to support the organisation streamline service delivery, supporting increased case volumes and managing costs.

Risk area	Areas of focus	Description of risk
<b>Risk of fraud in revenue recognition</b>	<b>Other Revenue</b> (at the year end) (Occurrence) <b>Receivables</b> (Existence, Valuation)	As set out in ISA 240, there is a presumed risk that revenue may be misstated due to improper recognition of revenue. AiB's most material revenue streams are through fees and charges as well as recoveries. Parliamentary funding is agreed to Scottish Funding is agreed to Scottish Government resource allocations confirmations and receipts and therefore considered less susceptible to material misstatement. Therefore our presumed risk therefore focuses on <b>Operating Income</b> , consisting of revenue from fees and charges and recoveries including repayments to the public purse. We consider the risk to be prevalent around the year end where financial performance is monitored against Scottish Government Departmental budget and greater incentive for fraud. We therefore focus our audit work on transactions around the year end. We will explicitly consider the underlying assumptions and supporting documentation in relation to year end accrued income from providers.

## Audit Response

- Walkthroughs of the controls and procedures over other income.
- Perform substantive testing (at an elevated risk level) over income recognised in the final two months of the year where there is an inherently higher susceptibility of fraudulent recognition
- Evaluation of the existence of debtor balances held at 31 March 2020 through agreeing balances held to invoices and/or other supporting records.
- We will review Management's assessment of bad debts through ensuring consistent with underlying records and based on assessment of outstanding debt and forecast recovery.
- Perform income cut-off procedures and substantive testing over pre and post year end balances, over non GIA funding income streams.
- A focus on recoverability of balances through agreeing a sample of debtor balances (at an elevated risk level) and agreeing to post year end cash receipt.
- We will review the key assumptions supporting the provider accrued income, including agreeing to supporting records, including third party provider confirmations.

# Significant financial statement risks

Risk area	Areas of focus	Description of risk
<b>Management override of controls</b>	<b>Journals</b> <b>Accounting Estimates</b>	<p>As set out in ISA 240 there is a presumed risk that management override of controls is present in all entities. This risk area includes the potential for management to use their judgement to influence the financial statements as well as the potential to override the AiB's controls for specific transactions.</p> <p>We consider those key judgements that are most susceptible to significant audit risk of management override are those over income and expenditure recognition. These are areas where management has the potential to influence the financial statement through estimate and judgement.</p>

## Audit Response

### Accounting estimates:

In assessing the risk of management override, consider those key accounting estimates and judgements that could impact on the organisations financial results and where there is an inherently increased risk of fraudulent misstatement or where management bias could result in a material misstatement. In response to the significant audit risk we will:

- consider the design of controls in place over key accounting estimates and judgements
- Review accounting estimates for management bias / indication of fraud that could result in material misstatement. This will include review of estimates as at 31 March 2020 and retrospective review of those estimates as at 31 March 2019.

### Journals testing:

We will use our data analytics tool *IDEA* to support our evaluation of journal transactions during the year. In response to the significant risk we will:

- Assess the design of controls in place over journal entries, including how these are prepared, authorised and processed onto the financial ledger;
- Will risk assess the journals population to identify large or unusual journal entries, such as those that are not incurred in the normal course of business, or those entries that may be indicative of fraud or error that could result in material misstatement. We will test these journals to ensure they are appropriate and that suitably recorded in the financial ledger and appropriately recognised within the financial statements;
- We will perform targeted testing of transactions around the financial year end reviewing those journals are large or otherwise appear unusual to understand the rationale for the transaction.

# Significant financial statement risks

Risk area	Areas of focus	Description of risk
<b>Risk of fraud in Expenditure recognition</b>	<b>Other Expenditure</b> (at the year end) (Completeness) <b>Payables</b> (Completeness, Valuation)	<p>Operating expenditure is understated or not treated in the correct period (risk of fraud in expenditure). As payroll expenditure is well forecast and agreeable to underlying payroll systems, there is less opportunity for the risk of misstatement in this expenditure stream. We therefore focus on <b>non-pay expenditure</b>. We consider the risk to be particularly prevalent around the year end and therefore focus our testing on cut-off of non-pay expenditure. We will consider the completeness of the expenditure recognised under the provider accrual and provision at the year end.</p>
<b>Audit Response</b>		
<ul style="list-style-type: none"> <li>• Walkthroughs of the controls and procedures over other expenditure</li> <li>• Perform substantive testing (at an elevated risk level) expenditure recognised post year end to identify if there is any potential understatement</li> <li>• Testing post year end bank statements and review of minutes and any legal expenses incurred to identify any potential unrecorded liabilities.</li> <li>• Reviewing accruals and deferred income around the year end to consider if there is any indication of understatement of balances held through consideration of accounting estimate</li> <li>• We will consider the completeness of expenditure accrued at year end in relation to transactions with third party providers to ensure complete and accurate</li> </ul>		

# Other audit areas

## Going concern considerations

As auditors, we are required to “obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern” (ISA (UK) 570).

We will review management's assessment of the going concern assumption and evaluate the disclosures in the financial statements, alongside our assessment based on substantive testing and audit procedures.

## Working with Internal Audit

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

During 2019/20, we engage with Internal Audit to confirm any awareness of fraud or suspected fraud. Where Internal Audit have identified specific material deficiencies in the control environment that would create a risk of material misstatement to the financial statements, we will consider adjusting our testing so that the audit risk is covered by our work.

## Internal control environment

Throughout our audit planning and fieldwork we will continue to develop our understanding of the overall control environment (design) as related to the financial statements. In particular we will:

- Consider procedures and controls around related parties, journal entries and other key entity level controls.
- Perform walkthrough procedures on key controls around identified risk areas including payroll expenditure, non-Scottish Government income, non-payroll expenditure, journal entries and material areas of management estimate and judgement including the year end provider accrual and provision.
- We will consider the assurances provided in the year through service auditor reports over the Scottish Government's finance systems that AiB utilise.

## Wider scope approach – Smaller body arrangements

For smaller bodies the Audit Scotland Code of Practice permits auditors to not apply the full wider scope audit. In our judgement, taking into account the nature of AiB operating activity and income and expenditure streams, we feel it is appropriate to continue to treat you as a smaller body under the Code. However, in accordance with Audit Scotland planning guidance, we will update our understanding of your arrangements for ensuring [financial sustainability](#) as well as your governance arrangements in place to support disclosures contained within the [annual governance statement](#) included within your financial statements.

# Other audit areas

## International Financial Reporting Standards 16: Leases (IFRS 16)

IFRS 16 was effective for accounting periods beginning on or after 1 January 2019 and is due to be adopted for bodies reporting under the FReM for financial years beginning on or after 1 January 2020. The new standard sets out the principles for the recognition, measurement, presentation and disclosure of leases and replaces the previous standard IAS 17. IFRS 16 introduces a single lessee accounting model aimed at providing a fairer representation of a lessee's assets and liabilities and disclosures around these. Under IFRS 16, the lessee recognises assets and liabilities with a term of more than 12 months, unless the underlying asset is of low value. In practice, this is likely to result in lease or lease type arrangements associated assets and liabilities being recognised in the financial statements of the lessee, where these may have previously been treated as operating leases where there was no asset or liability recognised and only an annual lease charge through expenditure.

During 2019/20 we will review the progress made by AiB in evaluating the potential implications on adoption of the new accounting standard. This will be reflected in the 2020/21 financial statements. We will consider the disclosures in the 2019/20 financial statements in relation to the anticipated impact of the new standard.

# Audit deliverables

As set out in the Code of Audit Practice, as appointed auditors we have a number of wider reporting responsibilities beyond the audit of the financial statements. Below we summarise the key areas of work during our 2019/20 audit, including expected reporting under Audit Scotland's Code of Audit Practice and audit planning guidance (2018/19 Guidance on Planning the Audit)

Requirement	How we will report our findings
<p><b>Annual accounts</b> Perform an audit of the annual accounts and express and express specified audit opinion on them.</p>	<ul style="list-style-type: none"> <li>• External audit plan</li> <li>• External auditor's opinion on the financial statements</li> <li>• Annual external audit report findings from our audit work of the financial statements</li> </ul>
<p><b>Wider scope audit dimensions</b> Conclude and report on our assessment of the wider scope audit dimensions as applicable to smaller bodies</p>	<ul style="list-style-type: none"> <li>• Annual external audit report (audit findings report) as applicable to smaller bodies (financial management and governance statement)</li> </ul>
<p><b>Emerging issues</b> Communication of emerging issues to Audit Scotland and highlight any issues for potential statutory reports</p>	<ul style="list-style-type: none"> <li>• Communicating throughout our audit emerging issues throughout the year</li> </ul>
<p><b>Correspondence queries</b> Carry out preliminary enquiries into any correspondence relevant to AiB that is referred to Audit Scotland.</p>	<ul style="list-style-type: none"> <li>• Providing responses to any correspondence received based on our audit knowledge and understanding and the results of any review as agreed with Audit Scotland</li> </ul>
<p><b>Money laundering and fraud</b> Provide information on cases of money laundering or fraud</p>	<ul style="list-style-type: none"> <li>• Reporting cases to the National Crime Agency of an instances of money laundering at AiB. Reporting of identified frauds to Audit Scotland.</li> </ul>
<p><b>Technical guidance</b> Contribute to Technical Guidance Notes</p>	<ul style="list-style-type: none"> <li>• Providing responses to Audit Scotland consultations on draft Technical Guidance notes for Auditors.</li> </ul>

# Appendices

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# Appendix 1: Fees and independence

## External Audit Fee

Service	Fees £
External Auditor Remuneration	34,100
Pooled Costs	8,830
Contribution to Audit Scotland costs	1,770
Contribution to Performance Audit and Best Value	-
<b>2019/20 Fee</b>	<b>44,700</b>

## Fees for other services

Service	Fees £
At planning stage we confirm there are no non-audit fees	Nil

## Independence and ethics

- 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 Financial Reporting Council's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.
- Grant Thornton are private trustees in bankruptcy/PTD processes. AiB have a supervisory role over the performance of private trustees in exercising their duties in regards to these processes. We do not consider these arrangements to impact on our auditor independence.
- Full details of all fees charged for audit and non-audit services will be included in our Annual Report to those charged with governance at the conclusion of the audit.
- We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standards.
- We are required by auditing and ethical standards to communicate any relationships that may affect the independence and objectivity of the audit team.
- We can confirm no independence concerns have been identified.

Audit Scotland sets an expected fee for each audit carried out under appointment which assumes that the body has well-functioning controls, an effective internal audit service, and an average risk profile.

Audit Scotland reviews the expected fee each year and adjusts it if necessary based on auditors' experience, new requirements, or significant changes to audited bodies. The audit fee is calculated in accordance with guidance issued by Audit Scotland. In accordance with the Audit Scotland guidance we can increase the fee by up to 10% from the base fee set by Audit Scotland, depending on risk factors identified by us as your external auditors. We cannot reduce the fee from the baseline set out by Audit Scotland. For 2019/20 we have agreed with AiB to set the audit fee at the baseline fee of £44,700. The fee is based on the following assumptions:

- supporting schedules to all figures in the accounts are supplied by the agreed dates and in accordance with the agreed upon information request list
- the scope of the audit, and the Boards' activities will not change significantly from planned
- AiB will make available management and accounting staff to help us locate information and to provide explanations. We reserve the right to charge an additional fee for any additional work.
- We will only receive (and audit) 3 sets of accounts (1st draft; amended draft and final)

## Client service

We take our client service seriously and continuously seek your feedback on our external audit service. Should you feel our service falls short of expected standards please contact Joanne Brown, Head of Public Sector Assurance Scotland in the first instance who oversees our portfolio of Audit Scotland work ([joanne.e.brown@uk.gt.com](mailto:joanne.e.brown@uk.gt.com)). Alternatively, should you wish to raise your concerns further please contact Jon Roberts, Partner and Head of Assurance, 30 Finsbury Square, London, EC2A 1AG. If your feedback relates to audit quality and we have not successfully resolved your concerns, your concerns should be reported to Elaine Boyd, Assistant Director, Audit Scotland Quality and Appointments in accordance with the Audit Scotland audit quality complaints process.



# Appendix 2: Fraud arrangements

The term fraud refers to intentional acts of one or more individuals amongst management, those charged with governance, employees or third parties involving the use of deception that result in a material misstatement of the financial statements. In assessing risks, the audit team is alert to the possibility of fraud at AiB.

As part of our audit work we are responsible for:

- identifying and assessing the risks of material misstatement of the financial statements due to fraud in particular in relations to management override of controls.
- Leading a discussion with those charged of governance (for AiB this is assumed to be the Audit Committee and the Accountable Officer) on their view of fraud. Typically we do this when presenting our audit plan and in the form of management and those charged with governance questionnaires.
- designing and implementing appropriate audit testing to gain assurance over our assessed risks of fraud
- responding appropriately to any fraud or suspected fraud identified during the audit.

As auditors we obtain reasonable but not absolute assurance the financial statements as a whole are free from material misstatement, whether due to fraud or error.

We will obtain annual representation from management regarding managements assessment of fraud risk, including internal controls, and any known or suspected fraud or misstatement.

## Anti-Money Laundering Arrangements

As required under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 there is an obligation on the Auditor General (as set out in the planning guidance) to inform the National Crime Agency if she knows or suspects that any person has engaged in money laundering or terrorist financing. Should we be informed of any instances of money laundering at AiB we will report to the Auditor General as required by Audit Scotland.

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

It is the AiB's responsibility to establish arrangements to prevent and detect fraud and other irregularity. This includes:

- developing, promoting and monitoring compliance with standing orders and financial instructions
- developing and implementing strategies to prevent and detect fraud and other irregularity
- receiving and investigating alleged breaches of proper standards of financial conduct or fraud and irregularity.

Throughout the audit we work with AiB to review specific areas of fraud risk, including the operation of key financial controls. We also examine the policies in place, strategies, standing orders and financial instructions to ensure that they provide a strong framework of internal control.

In addition, as set out in the Audit Scotland Code of Audit Practice we have a role in reviewing AiB's arrangements in response to the national fraud initiative exercise.

All suspected frauds and/or irregularities over £5,000 are reported to Audit Scotland by us as your auditors on a quarterly basis.

# Appendix 3: Communication with the Accountable Officer and the Audit Committee

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

This document, The Audit Plan, outlines our audit strategy and plan to deliver the audit, while our Annual Report to those Charged with Governance (the Accountable Officer and the Audit Committee) will be issued prior to approval of the financial statements and will present key issues 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 a report to the AiB's Management and the Audit and Risk Committee.

<b>Our communication plan</b>	<b>Audit Plan</b>	<b>Audit Findings</b>
Respective responsibilities of auditor and management/those charged with governance (the Accountable Officer and the Audit Committee)	•	
Overview of the planned scope and timing of the audit, including planning assessment of audit risks	•	
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 AiB's accounting and financial reporting practices, including accounting policies, accounting estimates and financial statement disclosures		•
Significant findings from the audit		•
Significant matters and issues 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		•
Expected modifications to the auditor's report, or emphasis of matter		•



*The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the entity or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.*

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