

# Scottish Ambulance Service

## Financial year ending 31 March 2022

External Audit Plan

Audit Committee

28 February 2022



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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 organisation or all weaknesses in your internal controls. This report has been prepared solely for your benefit and Audit Scotland (under the Audit Scotland Code of Practice 2016). 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.

# Plan overview

The audit plan sets out our risk based audit approach for the Scottish Ambulance Service (SAS). This plan outlines our risk assessment and is reported to those charged with governance (Audit Committee on behalf of the Board) and submitted to Audit Scotland for publication on the Audit Scotland website. Our audit covers the SAS Group and Board financial statements consisting of SAS and the Endowment Fund.

## 03 Wider Scope Audit

In accordance with the Code, our planning considers the wider scope areas of audit. At this stage in our audit planning we have identified two wider scope risks and will conclude on these during the audit:

- Financial sustainability – SAS’s financial strategy 2022-25
- Value for money – SAS’ focus on workforce planning, technology, and performance management

In accordance with Audit Scotland’s planning guidance we will also consider the risk of fraud in procurement arrangements at SAS.

## 01 Materiality

We have calculated planning materiality for SAS using prior year gross expenditure as our benchmark:

- £7.245 million group planning materiality (2% expenditure) (SAS only: £7.244 million)
- Performance materiality of £5.434 million (75% of planning materiality) (SAS only: £5.433 million)
- Trivial is capped at £250,000.
- We have set a lower materiality on the Remuneration report of £20,000.

## 04 Other audit matters

We summarise other audit matters for Audit Committee awareness. This includes:

- In accordance with the Code and planning guidance we also complete and submit a number of deliverables in year including sharing intelligence with Audit Scotland, Audit Scotland data sets and opinion to support the consolidation at a Scottish Government level.
- Consideration of going concern in accordance with Practice Note 10.

## 02 Financial statement audit risks

At planning, in accordance with the ISA’s (UK) and FRC Practice Note 10 we have identified the following significant financial statement audit risks:

- Management override of controls (ISA UK 240)
- Risk of fraud in revenue expenditure (cut-off) (FRC PN10)

We have rebutted the risk of fraud in revenue recognition as the majority of funding is via the Scottish Government.

## 05 Our Audit Fee

Audit fees were shared by Audit Scotland with SAS in December 2021. Our fee agreed with the Director of Finance is £82,280.

Audit fees are paid to Audit Scotland who pay us.

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

# Introduction

## Purpose

This document provides an overview of the planned scope and timing of the external audit of Scottish Ambulance Service (SAS) for those charged with governance.

We are appointed by the Auditor General as the external auditors of SAS for the 6 year period (2016/17 until 2021/22).

## Respective responsibilities

Audit Scotland has issued a document entitled Code of Audit Practice ('the Code') dated 2016 covering this audit appointment period. This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities, and that of SAS are summarised in Appendix 1 of this plan. We draw your attention to this and the Code.

## Scope of our audit

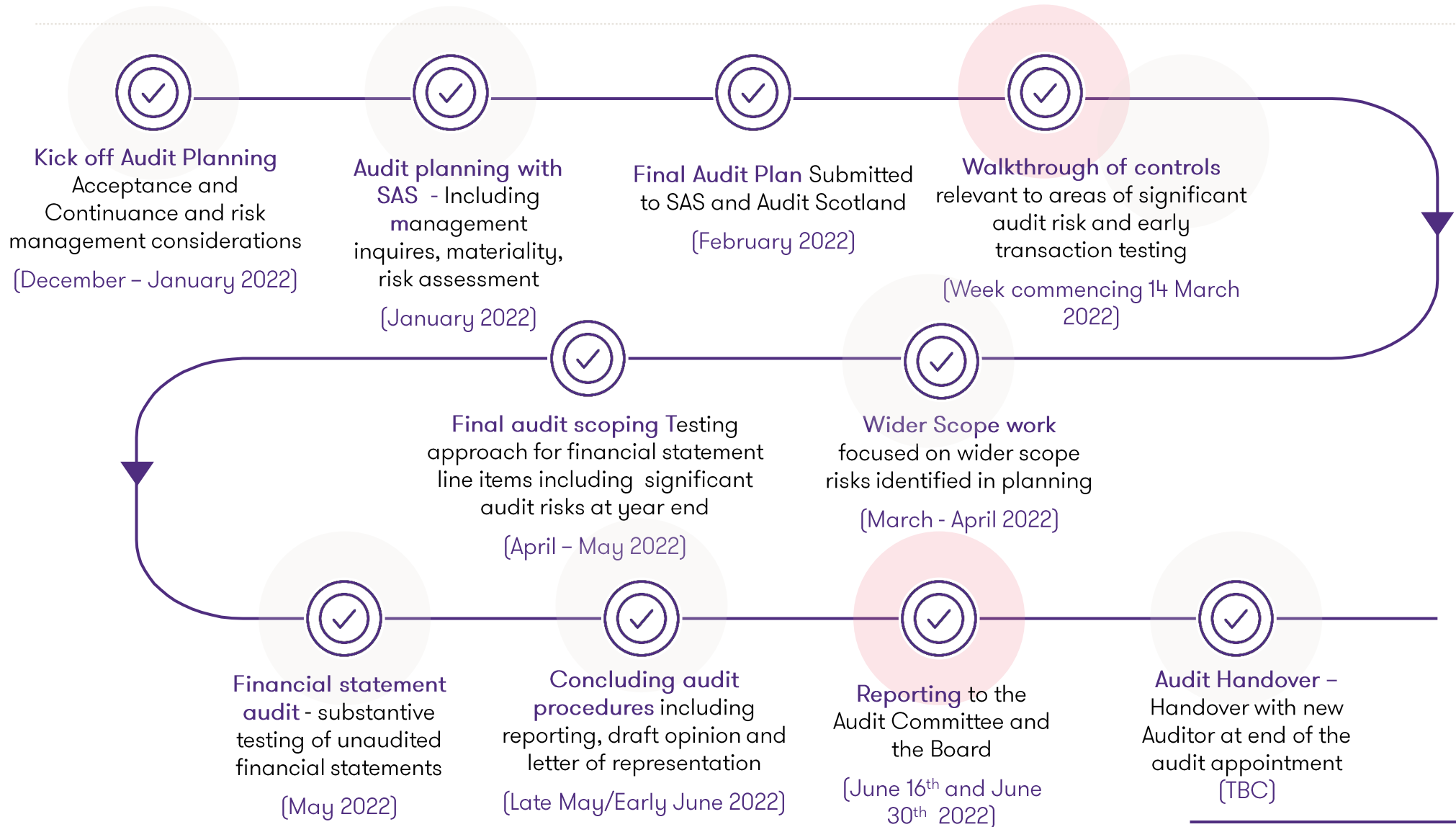
The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on SAS's financial statements that have been prepared by management with the oversight of those charged with governance (the Audit Committee).

The audit of the financial statements does not relieve management or the Audit Committee of your responsibilities. It is the responsibility of SAS to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We will consider how SAS is fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of SAS and is risk based.

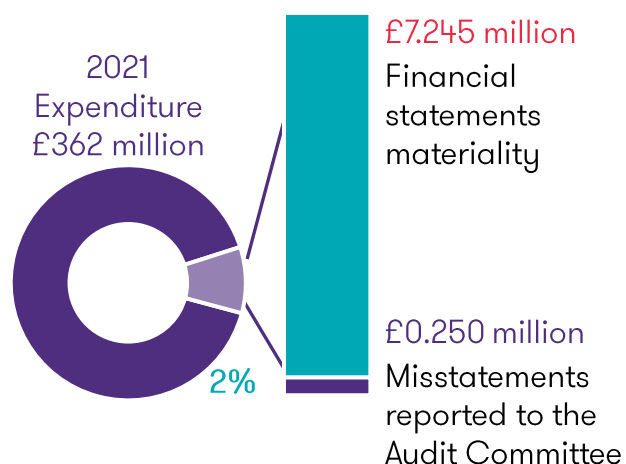


# Audit approach



# Materiality

Financial statement materiality is determined based on a proportion of the total operating expenditure. We have determined group **planning materiality** to be £7.245 million (SAS only: £7.244 million), which equates to approximately 2% of your prior year total operating expenditure.



**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. We use this to determine our testing approach to the financial statements. We have set this at 75% of planning materiality (£5.434 million) which is consistent with the rate used in the prior year (SAS only: £5.433 million). This is based on our understanding of SAS including no material adjusted or unadjusted errors in the prior year and overall risk assessment.

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.

On this basis we apply a separate **lower materiality level** to the Remuneration and Staff Report. We have set this at £20,000.

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 £250,000 being the maximum threshold prescribed by Audit Scotland.

**We will update our materiality based on the unaudited 2021/22 financial statements when received May 2022. During the course of our audit engagement, we will continue to assess the appropriateness of our materiality.**

# Significant audit risks

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.

## Management Override of Controls (as required within Auditing Standards – ISA 240)

As set out in ISA 240 there is a presumed risk that management override of controls is present in all entities. 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 SAS internal controls, related to individual transactions.

Our work focuses on critical estimates and judgements as set out within the financial statements, including accounting policies. In addition, we specifically consider cut-off (expenditure) and the use of manual journals during the year, and in creating the financial statements where controls may be overridden by management.

## Risk of Fraud in Expenditure (as recommended in FRC Practice Note 10 for Public Sector entities)

As set out in practice note 10 (revised) which applies to public sector entities, we consider there to be an inherent risk of fraud in expenditure recognition. Recognising the nature of RRL and Scottish Government funding, we have identified a higher risk of fraud and financial misreporting within 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 material non-pay expenditure streams.. This approach is the same as prior year.

Our testing includes a specific focus on year end cut-off arrangements, where it may be advantageous for management to show an enhanced/different financial position in the context of reporting in-year to Scottish Government and the need to achieve the financial targets set.

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# Significant audit risks (continued)

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Auditing standards require us to consider the **risk of fraud in Revenue**. This is considered a presumed risk in all entities. From reviewing SAS Income the majority of this comes via Resource Revenue Allocations direct from the Scottish Government. The risk of material misstatement is therefore reduced. Other income, not received in this way, includes income from other NHS bodies, non-patient care income generation schemes and other operating income. In 2020/21 this amounted to £10.5million. In the context of our materiality we believe there is limited risk of a material misstatement due to fraud or error within this balance and have therefore rebutted the risk of fraud in revenue recognition in full.

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Annual Report to those Charged with Governance and the Auditor General for Scotland in concluding our audit in June 2022.



# Wider scope risks identified in planning

Our responsibilities under Audit Scotland's Code of Audit Practice extend beyond the audit of the financial statements. The Code sets out four audit dimensions that frame wider scope into identifiable areas; Financial Sustainability, Financial Management, Governance and Transparency and Value for Money. We consider each of these areas through our audit planning process and have included where we have identified areas of significant wider scope risk.

## Financial sustainability – Medium term financial strategy

While projecting a breakeven position for 2021/22, the underlying financial position reflects a challenging financial year as the organisation has faced cost and operational pressures as a result of Covid-19 response and recovery activity. Operational pressures have meant that as at December 2021, Best Value and efficiency savings were £2.5 million below forecasts. Management have implemented a number of steps to address the challenges in the current year. However, SAS recognise it faces significant financial challenges in the year to come. As part of SAS' financial planning for 2022/23 and beyond, Management are evaluating the recurring impact of living with Covid-19 in future years, including recurring costs pressures and those that will cease. In addition a pipeline of future programmes is being collated to support the development of the 2022-25 financial plan.

With increasing costs pressures, including payroll and other inflationary costs, as well as uncertainty around the medium term impact of Covid-19 on service delivery and the ability to deliver Best Value saving programmes, SAS face significant financial pressures in the coming years.

In response, we will look to understand the Board's medium term financial strategy and the extent these look to address the financial challenges faced in the coming years. This will include SAS's planned efficiency programmes and how Management seek to manage the medium to longer term cost implications of Covid-19.

# Wider scope risks identified in planning (continued)

## Value for money/Governance and transparency .

SAS has reported that the service is experiencing exceptional and sustained levels of pressure on services. This is through increases in Covid-19 and non Covid-19 related demand, operational challenges in transferring patients in a timely manner at emergency departments due to wider healthcare system pressures and workforce capacity.

SAS has invested in, and continues to invest in, via additional Scottish Government funding its demand and capacity programme. This programme will create additional capacity in how SAS deliver services in the future and supports the workforce planning within SAS. Given the significance of the investment (financially) as well as contributing to the SAS strategy we will consider this programme. We will focus on governance and decision making including impact on performance.

## Other wider scope areas: Risk of fraud in procurement

Audit Scotland's Planning Guidance 2021/22, requires us to consider the risk of fraud in procurement across our audited bodies. In addition to the wider scope risks set out above, we will consider specific risk of fraud within procurement during 2021/22. We will consider audit Scotland's: Procurement Red Flags (2019) when undertaking our assessment and report our conclusions within our Annual Audit Report.

# Other matters

## Auditor Responsibilities

We have a number of audit responsibilities as set out in the Code and planning guidance:

- 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).
- 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 FReM (opinion).
- We issue a separate "consistency with" opinion on your summarisation schedules which confirm whether the schedules are consistent with the audited financial statements. This is submitted to Scottish Government Health and Social Care Directorate.
- We consider our other duties under the Code and planning guidance (2020/21), as and when required, including:
  - Supporting Audit Scotland in Section 22 reporting.
  - Informing the Shared Intelligence Group via a data return, presented and facilitated by Audit Scotland.
  - Participating in the Audit Scotland NHS Sector group.
  - Completing a data set provided by Audit Scotland to support NHS Overview reporting.
  - Review of NHS Technical guidance prior to issue by Audit Scotland.

## 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: Scottish Government income, Other Operating Income, payroll expenditure, expenditure, property, plant and equipment, journal entries and material areas of management estimate and judgement.
- Our focus is design and implementation of controls only. We do place reliance on controls when it comes to our year end financial statement audit work.

## 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.

## 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 has recently been updated to take account of revisions to ISAs (UK), including ISA (UK) 570 on going concern. The revisions to PN 10 in respect of going concern are important.

In particular, PN 10 allows auditors to apply a 'continued provision of service approach' to auditing going concern, where appropriate. In considering going concern we will refer to Audit Scotland's Going Concern publication (December 2020).

Within our wider scope work we will conclude on SAS's arrangements to ensure financial sustainability.

## Accounting estimates

Under ISA (UK) 540 auditors are required to understand and assess an entity's internal controls over accounting estimates, including:

- The nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates;
- How management identifies the need for and applies specialised skills or knowledge;
- How the entity's risk management process identifies and addresses risks relating to accounting estimates;
- The entity's information system;
- The entity's control activities in relation to accounting estimates; and
- How management reviews the outcomes of previous accounting estimates.

To ensure compliance with this revised auditing standard, we will be requesting further information from management and those charged with governance during our audit. Based on our knowledge of SAS we have identified one material accounting estimates for which this is likely to apply, accruals.

Further detail is set out in our Appendix on Page 22

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## Fair Pay disclosures – Changes in FReM

One of the main changes to the FReM 2021/22 is to expanded requirements for Fair Pay Disclosures within the remuneration and staff report. This is in line with changes made to the FReM for 2021/22. The main changes are:

- A new requirement to disclose the percentage year on year changes in salary and allowances, and performance pay and bonuses, for the highest paid director and for the employees of the entity taken as a whole;
- total pay and benefits, and the salary component separately, for the 25th, 50th and 75th percentiles (previously just the median remuneration). This should be based on annualised, full-time equivalent remuneration of all staff (including temporary and agency staff) as at 31 March 2022. For the purpose of this disclosure, pay and benefits excludes the value of pension benefits and severance payments.

A summary for 2021/22 explaining:

- whether movement in the ratios is attributable to a change in the highest paid director's remuneration or the employees, or a change in the body's employment models;
- trends in the median pay ratio; and,
- whether the body believes that the median pay ratio reflects the pay, rewards and progression policy for employees as a whole.

We will review SAS' Remuneration and Staff report disclosures in the draft financial statements to evaluate whether the disclosures are complete, clear, concise, and free from material misstatement.

# Audit timeline



## Client responsibilities

Where clients do not deliver to the timetable agreed, we need to ensure that this does not impact on audit quality or absorb a disproportionate amount of time, thereby disadvantaging other clients. Where additional resources are needed to complete the audit due to a client not meeting their obligations we are not able to guarantee the delivery of the audit to the agreed timescales. In addition, delayed audits will incur additional audit fees.

## Our requirements

To minimise the risk of a delayed audit, you need to ensure that you:

- produce draft financial statements of good quality by the deadline you have agreed with us, including all notes, the Annual Report and the Annual Governance Statement
- ensure that good quality working papers are available at the start of the audit, in accordance with the working paper requirements schedule that we have shared with you
- ensure that the agreed data reports are available to us at the start of the audit and are reconciled to the values in the accounts, in order to facilitate our selection of samples for testing
- ensure that all appropriate staff are available (or as otherwise agreed) over the planned period of the audit
- respond promptly and adequately to audit queries.

# Quality and adding value through the audit

Our overall approach for the audit is clear and upfront communication, founded on our public sector credentials and a methodology to ensure delivery of a quality audit.

The diagram opposite summarises our key approach to adding value to you throughout our audit.

Our methodology is risk based. We comply with Auditing standards and as a Firm we are regulated by the FRC. We taking findings on audit quality seriously and continue to invest as a Firm through our audit investment plan. The audit investment plan is supported by a specific national Public Sector audit plan.

We comply with Audit Scotland's quality arrangements including submitting an annual quality report over our Audit Scotland portfolio. As part of Audit Scotland's quality arrangements, ICAS review our work on a rotational basis. Audit Scotland's quality report can be found at [www.audit-scotland.co.uk](http://www.audit-scotland.co.uk)

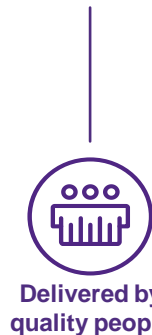
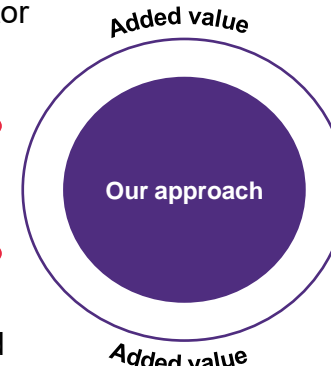
Our wider quality arrangements are set out in our annual transparency reports which are available on our website ([www.granthornton.co.uk](http://www.granthornton.co.uk)).

## Project management

- Use of Inflo to track progress and deliverables throughout the audit
- Clear roles and ownership of responsibilities within our team
- Clarity over expectations and timetable
- Track record delivering public sector audits on behalf of Audit Scotland

## Clear reporting

- Clear audit outputs at planning and within our final Annual Report
- Practical, risk based, recommendations for you to take forward
- Our judgements and conclusions set out transparently and in clear language
- Senior presence at Audit Committees to present our findings and support wider dialogue



## Pragmatism and early attention of issues

- Accessible and proactive engagement team
- Working with you to reach the right solution – flexing the workplan, recognising Covid-19
- Audit partner takes ultimate decision on technical matters, consulting with our technical experts

## Public sector understanding

- Using our public sector insight to inform our audit and identify improvements you could make
- Regular meetings throughout the year sharing our observations and wider sector knowledge
- Wider scope conclusions to support you in considering key risks and the improvement actions to take

# Audit Fees

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. This includes the revised ISA (UK) 540 (revised): Auditing Accounting Estimates and Related Disclosures.

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

Audit fees were shared by Audit Scotland with SAS in December 2021. We have increased the SAS audit fee by £2,000 reflecting work in year on the completeness of the IFRS 16 disclosures expected to be included in the annual report and accounts.

## Relevant professional standards

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 2019) which state that the Engagement Lead 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.

## Audit fees for 2021/22

Service	Fees £
External Auditor Remuneration	71,120
Pooled Costs	7,750
Contribution to Audit Scotland costs	3,410
Contribution to Performance Audit and Best Value	Nil
<b>2021/22 Fee</b>	<b>82,280</b>

## Additional Fees (Non-Audit Services)

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

## Fee assumptions

In setting the fee for 2021/22 we have assumed that the SAS 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
- provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made in preparing the financial statements
- provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements.



# Independence

## Auditor independence

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant facts and matters that may bear upon the integrity, objectivity and independence of the firm or covered persons relating to our independence.

We encourage you to contact us to discuss these or any other independence issues with us.

We will also discuss with you if we make additional significant judgements surrounding independence matters.

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 Standard (Revised 2019) 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.

We confirm that we have implemented policies and procedures to meet the requirements of the Ethical Standard.

Our team complete annual fit and proper declarations including independence confirmations on a client by client basis as well as completing timesheets. The work of our Ethics team is overseen by the Ethics partner and all staff undergo ethics training in year.



# Appendices

# 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.

## SAS

Responsibilities include:

- Preparing financial statements that give a true and fair view
- Maintaining accounting records
- Establishing and maintaining systems of internal control
- Effective internal controls including controls to achieve objectives and secure value for money
- Establish arrangements for proper conduct of affairs including legality of transactions
- Arrangements for prevention and detection of fraud, error, irregularity, bribery and corruption
- Appropriate corporate governance arrangements and arrangements to monitor the effectiveness of governance

## External Audit

Responsibilities include:

- Comply with professional engagement and ethical standards
- Provide an ISA compliant audit and opinion on the financial statements including regularity of transactions
- Demonstrate compliance with the wider scope public audit as detailed in the Code and applicable guidance
- Liaise with and notify Audit Scotland when circumstances indicate a statutory report may be required. This includes sharing awareness of current and/or sector issues
- Notify Audit Scotland of any known or suspected frauds greater than £5,000
- Contribute to relevant performance studies (as set out in the planning guidance for the year)



# Communication

ISA (UK) 260 as well as other ISAS set out prescribed matters which we are required to report to those charged with governance (we assume this to be the Audit Committee on behalf of the Board). Our reporting responsibilities are set out below. We communicate all matters affecting the audit on a timely basis, to management and/or the Audit Committee.

	Audit Plan	Annual Report (considered our ISA 260 Report)
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, including planning assessment of audit risks and wider scope 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 SAS'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		•

# Fraud responsibilities

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 Scottish Ambulance Service.

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 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 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. We also make inquires of internal audit around internal control, fraud risk and any known or suspected frauds in year.

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 SAS'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 SAS 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 SAS' arrangements in response to the National Fraud Initiative.

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

### 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 he 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 SAS we will report to the Auditor General as required by Audit Scotland.

# Accounting estimates and related disclosures

The Financial Reporting Council issued an updated ISA (UK) 540 (revised): *Auditing Accounting Estimates and Related Disclosures* which includes significant enhancements in respect of the audit risk assessment process for accounting estimates. The first year this impacted on was the 2020/21 financial year.

## Introduction

Under ISA (UK) 540 (Revised December 2018) auditors are required to understand and assess an entity's internal controls over accounting estimates, including:

- The nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates;
- How management identifies the need for and applies specialised skills or knowledge related to accounting estimates;
- How the entity's risk management process identifies and addresses risks relating to accounting estimates;
- The entity's information system as it relates to accounting estimates;
- The entity's control activities in relation to accounting estimates; and
- How management reviews the outcomes of previous accounting estimates.

As part of this process auditors also need to obtain an understanding of the role of those charged with governance, which is particularly important where the estimates have high estimation uncertainty, or require significant judgement.

Specifically do **Audit Committee** members:

- Understand the characteristics of the methods and models used to make the accounting estimates and the risks related to them;
- Oversee management's process for making accounting estimates, including the use of models, and the monitoring activities undertaken by management; and
- Evaluate how management made the accounting estimates?

## Additional information that will be required

To ensure our compliance with this revised auditing standard, we will be requesting again this year further information from management and those charged with governance during our audit for the year ended 31 March 2022.

Based on our knowledge of the SAS, in particular prior year, we have identified only one material accounting estimate, accruals.

## SAS's Information systems

In respect of SAS's information systems we are required to consider how management identifies the methods, assumptions and source data used for each material accounting estimate and the need for any changes to these. This includes how management selects, or designs, the methods, assumptions and data to be used and applies the methods used in the valuations.

If management has changed the method for making an accounting estimate we will need to fully understand management's rationale for this change.

Any unexpected changes are likely to raise the audit risk profile of this accounting estimate and may result in the need for additional audit procedures.

# Financial accounting updates – International Financial Reporting standard 16: Leases

Following the previous deferrals of IFRS 16 *Leases* under the FReM, this accounting standard will now be implemented from 1 April 2022.

The new standard brings significant changes for lessee accounting. Key points that bodies will need to consider on transition include:

- The need to recognise the cumulative effects of initially applying IFRS 16 on 1 April 2022 as an adjustment to the opening balances of taxpayers' equity. (This means prior year comparators will not need to be restated at 31 March 2023).
- The need to recognise the right-of-use asset for leases previously classified as operating leases at an amount equal to the outstanding lease liability.
- No adjustments are needed for leases for which the underlying asset is of low value (less than £5,000 new) or where the lease term ends on or before 31 March 2023.
- Assets where there is no or a below market rate peppercorn lease premium should be recognised as a right-of-use asset measured at current value in existing use or fair value as appropriate. Any difference between this and the lease liability will be recognised as part of the adjustment to the opening balances of taxpayers' equity.
- Irrecoverable VAT should not be included in the lease liability nor the value of the right of use asset.
- Existing finance lease and PFI liabilities that have an element based on an index or other rate will need to be reviewed and possibly amended as such variable payments are incorporated into the measurement of the lease liability under IFRS 16. (HM Treasury is expected to provide further guidance regarding the implementation of changes to accounting for PFI arrangements).

## Impact on 2021/22

The 2021/22 financial statements will need to disclose the anticipated impact of adopting IFRS 16 from 1 April 2022.

We will consider the organisation's progress towards the implementation of IFRS 16 and the completeness and accuracy of disclosures within the financial statements of the impact of the adoption of the new standard.



# Auditing developments

There are changes to the following ISA (UK):

- ISA (UK) 315 (Revised July 2020) 'Identifying and Assessing the Risks of Material Misstatement' - This will impact audits of financial statement for periods commencing on or after 15 December 2021.
- ISA (UK) 240 (Revised May 2021) 'The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements' This will impact audits of financial statement for periods commencing on or after 15 December 2021.

A summary of the impact of the key changes on various aspects of the audit is included below:

Area of change	Impact of changes
Risk assessment	<ul style="list-style-type: none"> <li>• The nature, timing and extent of audit procedures performed in support of the audit opinion may change due to clarification of:               <ul style="list-style-type: none"> <li>• the risk assessment process, which provides the basis for the assessment of the risks of material misstatement and the design of audit procedures</li> <li>• the identification and extent of work effort needed for indirect and direct controls in the system of internal control</li> <li>• the controls for which design and implementation needs to be assess and how that impacts sampling</li> <li>• the considerations for using automated tools and techniques.</li> </ul> </li> </ul>
Direction, supervision and review of the engagement	<ul style="list-style-type: none"> <li>• Greater responsibilities, audit procedures and actions are assigned directly to the engagement lead, resulting in increased involvement in the performance and review of audit procedures.</li> </ul>
Professional scepticism	<ul style="list-style-type: none"> <li>• The design, nature, timing and extent of audit procedures performed in support of the audit opinion may change due to:               <ul style="list-style-type: none"> <li>• increased emphasis on the exercise of professional judgement and professional scepticism</li> <li>• an equal focus on both corroborative and contradictory information obtained and used in generating audit evidence</li> <li>• increased guidance on management and auditor bias</li> <li>• additional focus on the authenticity of information used as audit evidence</li> <li>• a focus on response to inquiries that appear implausible</li> </ul> </li> </ul>

Area of change	Impact of changes
Fraud	<ul style="list-style-type: none"><li>• The design, nature timing and extent of audit procedures performed in support of the audit opinion may change due to:<ul style="list-style-type: none"><li>• clarification of the requirements relating to understanding fraud risk factors</li><li>• additional communications with management or those charged with governance</li></ul></li></ul>
Documentation	<ul style="list-style-type: none"><li>• The amendments to these auditing standards will also result in additional documentation requirements to demonstrate how these requirements have been addressed.</li></ul>

