

National Records of Scotland External Audit Plan

**Year ending
31 March 2023**

27 June 2023



Contents

Your key Grant Thornton team members are:

Angela Pieri

Engagement Lead

T: 0161 214 6337

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

Hannah McKellar

Audit Manager

T: 0131 659 8568

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

Section	Page
Introduction	03
Plan overview	04
Audit approach	06
Audit timeline	07
Materiality	08
Significant audit risks	09
Other risks identified	13
Other matters	14
Wider scope risks identified in planning	19
Audit Fees	23
Adding value through the audit	25
Appendices	26

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 2021). 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.

Introduction

Purpose

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

We are appointed by the Auditor General as the external auditors of National Records of Scotland for the five-year period 2022/23 to 2026/27.

Respective responsibilities

Audit Scotland has issued an updated Code of Audit Practice ('the Code') covering this audit appointment period. There are no significant changes in the scope of our work compared to the previous 2016 Code. However, the 2021 Code applies the requirement to communicate key audit matters to all bodies but requires them to be reported in the Annual Audit Report.

The Code summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities, and that of National Records of Scotland are summarised in Appendix 1 of this Audit Plan. We draw your attention to this and the Code.

Scope of our audit

The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on National Records of Scotland's financial statements, which have been prepared by management with the oversight of those charged with governance (the Audit and Risk Committee). Our audit of the financial statements does not relieve management or the Audit and Risk Committee of your responsibilities.

It is your responsibility to ensure that proper arrangements are in place for the conduct of your business, and that public money is safeguarded and properly accounted for. As part of our wider scope work, we will consider how you are fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of National Records of Scotland and is risk based.



Plan overview

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

01 Materiality

We have calculated our planning materiality using prior year gross expenditure as per audited 2021/22 financial statements as our benchmark, resulting in the following:

- £0.984 million planning materiality is based on 1.5% of gross expenditure.
- Performance materiality of £0.640 million is based on 65% of planning materiality.
- Trivial of £0.049 million is based on 5% of materiality.
- A lower materiality has been determined as:
 - £5,000 for the auditable elements of the Remuneration Report.

We will revisit our materiality throughout our audit including updating to reflect the draft unaudited financial statements for 2022/23.

02 Financial statement audit

At planning, in accordance with the ISA's (UK) and Practice Note 10 (Revised 2020) 'The Audit of Public Sector Financial Statements' issued by the Public Audit Forum we have identified the following significant financial statement audit risks:

- Management override of controls (ISA (UK) 240);
- Risk of fraud in expenditure recognition (completeness) (PN10);
- Valuation of land and buildings (valuation);

Two revised Auditing Standards (ISA (UK) 315 (Revised July 2020) ISA (UK) 240 (Revised May 2021)) will be applicable to your audit for the first time in 2022/23. Further detail on the impact of these revised standards is set out in the appendices.

03 Wider Scope and Best Value Audit

In accordance with the Code, our planning considers the wider scope and Best Value areas of audit.

We have identified the following wider scope risks and will conclude on these during the audit:

- **Financial sustainability** – future financial plans for 2023/24 and beyond
- **Use of Resources to Improve Outcomes** - lessons learned from the 2022 Census

We have not identified any other significant risks in relation to the other wider scope areas of audit or in National Record of Scotland's arrangements for securing Best Value from our initial planning work.

We will be undertaking work in all wider scope Code areas to gain an understanding of the arrangements in place and may update our planning assessment dependent upon findings. We review your arrangements before we issue our Annual Report.

Plan overview (continued)

04 Other audit matters

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

- In accordance with the Code and planning guidance we also complete and submit a number of deliverables during the year, including sharing intelligence with Audit Scotland, and completing Audit Scotland data sets
- Consideration of going concern in accordance with Practice Note 10.

05 Our Audit Fee

Audit fees were shared by Audit Scotland with National Records of Scotland in December 2022. The Audit Fee set by Audit Scotland is £69,820. This fee includes:

- Auditor remuneration £68,410
- Pooled Costs £4,540
- Sectoral cap adjustment of -£5,540 and
- Contribution of £2,410 to Audit Scotland costs.

Audit fees are paid to Audit Scotland who in turn pay Grant Thornton UK LLP.

We do not expect the need to engage an auditor's expert in relation to the valuation of land and buildings, but if this was required, this would be subject to an additional audit fee, which we would agree with National Records of Scotland.

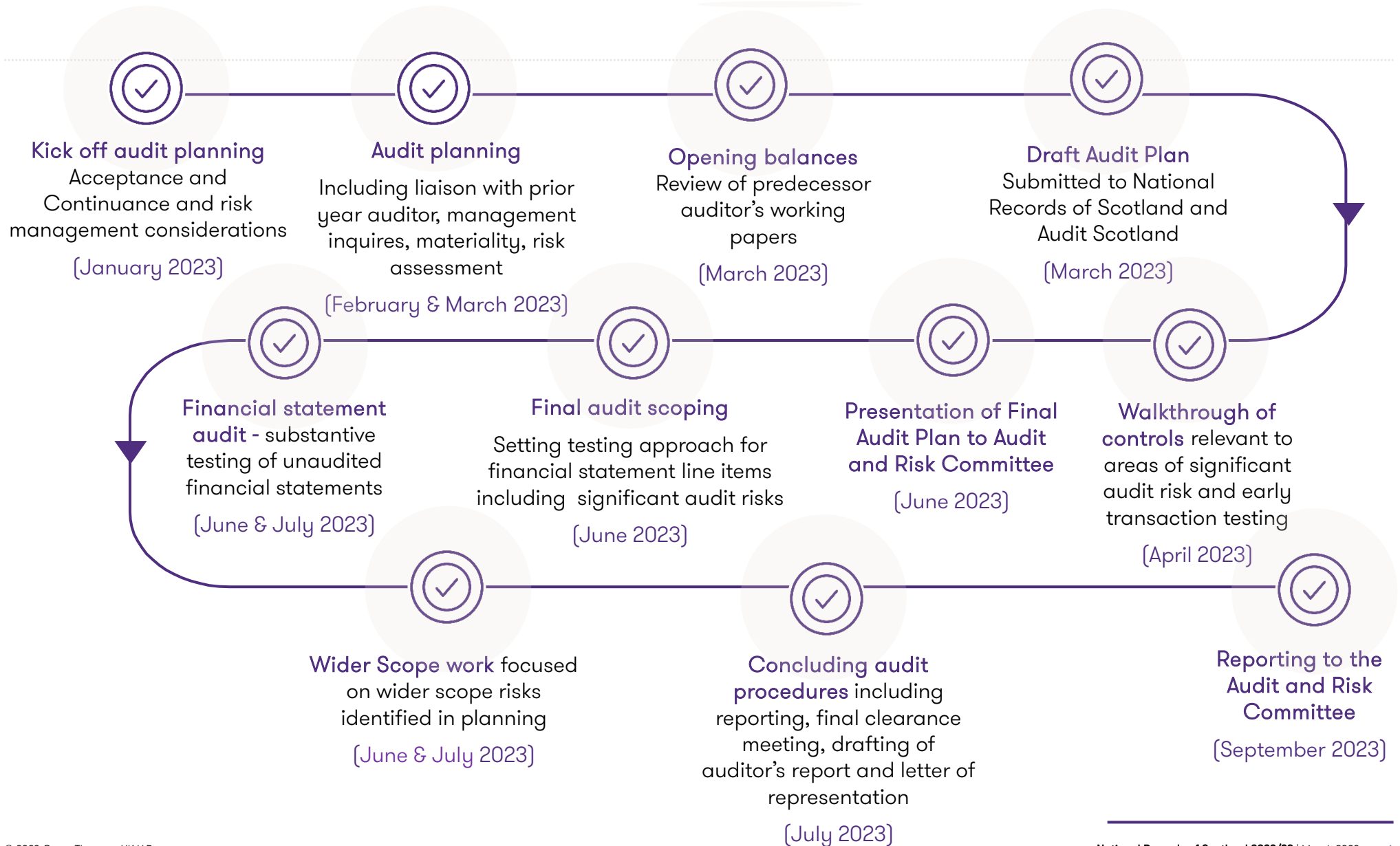
We reserve the right to review our fee during the audit should significant delays be encountered and/or new technical matters arise.

06 Adding Value Through the Audit

Our overall approach to adding value through the audit is clear and upfront communication, founded on our public sector credentials. We use our LEAP audit methodology and data analytics to ensure delivery of a quality audit.

As we undertake our first year as your new auditor, we will bring a fresh perspective by implementing an element of unpredictability in our testing to highlight areas of risk and improvements that can be made through both the financial statement and wider scope and best value audit.

Audit approach



Audit timeline

The target dates specified by Audit Scotland for submission of audit Plans, audited accounts and the Annual Audit Report have been brought forward in the 2021 Code. We are required to submit audit plans to Audit Scotland by 31 March 2023, and it is anticipated that we will have drafted our Annual Audit Report and shared with management by 31 August 2023. However, the earliest that the Audit and Risk Committee can convene is September 2023, therefore, submission of the audited accounts and Annual Audit Report will not be made by the targeted deadline of 31 August 2023. We have set out below our planned timescales for the National Records of Scotland audit.



Audited body responsibilities

Where audited bodies 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 our other audit engagements. Where additional resources are needed to complete the audit due to an audited body 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.

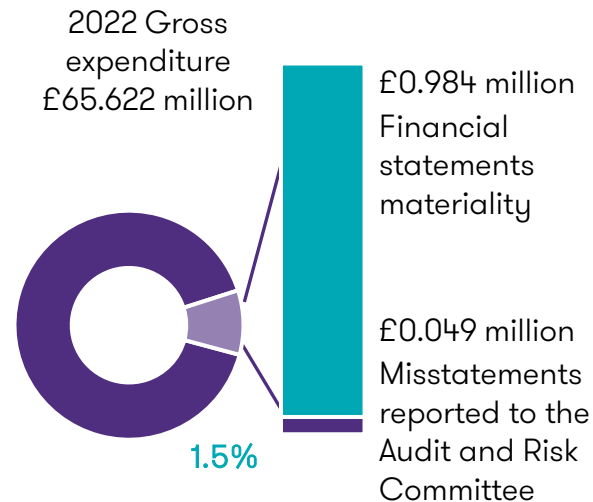
Our requirements

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

- produce draft accounts, comprising financial statements and related reports, of good quality, by the deadline you have agreed with us
- prepare good quality working papers which support the figures included in the financial statements, in line with the working paper requirements schedule that we have shared with you, and make these available to us at the start of the year end audit visit
- provide all agreed data reports to us at the start of the audit, which are fully cleansed and reconciled to the figures in the financial statements
- ensure that all appropriate staff including management's valuers are available to us for queries over the planned period of the audit, or as otherwise agreed
- respond promptly and appropriately to all audit queries, within agreed timescales.

Materiality

Financial statement materiality is determined based on [a proportion of gross expenditure. We have determined **planning materiality** to be £0.984 million, which equates to approximately 1.5% of gross expenditure as per the 2021/22 audited financial statements.



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 65% of planning materiality (£0.640 million). This is based on our understanding of National Records of Scotland and our overall risk assessment procedures.

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 apply a separate lower materiality level in the following areas:

- £5,000 for the auditable elements of the Remuneration Report

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 £0.049 million, being 5% of planning materiality.

We will reconsider our materiality based on the unaudited 2022/23 financial statements when received. During the course of our audit engagement, we will continue to assess the appropriateness of our materiality.

Significant audit risks (1)

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

Management Override of Controls (as required by Auditing Standards – ISA (UK) 240)

As set out in ISA (UK) 240 (Revised May 2021) ‘The Auditor’s Responsibilities Relating to Fraud in an Audit of Financial Statements’ 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 the entity’s internal controls, related to individual transactions. Our work focuses on journals, critical estimates and judgements, including accounting policies, and unusual transactions.

We will:

- Document our understanding of and evaluate the design effectiveness of management’s key controls over journals;
- Analyse your full journal listing for the year and use this to determine our criteria for selecting high risk journals;
- Test the high-risk journals we have identified;
- Gain an understanding of the critical judgements applied by management in the preparation of the financial statements and consider their reasonableness;
- Gain an understanding of the key accounting estimates made by management and carry out substantive testing on in scope estimates.
- Evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions.

"Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, due to either size or nature, and that therefore occur infrequently. Judgmental matters may include the development of accounting estimates for which there is significant measurement uncertainty." (ISA (UK) 315)

Significant audit risks (2)

Risk of Fraud in Revenue (as required within Auditing Standards– ISA (UK) 240)

As set out in ISA (UK) 240 (Revised May 2021), there is a presumed risk that revenue may be misstated due to improper recognition of revenue in all entities. Having considered the risk factors set out in ISA 240 and the nature of the revenue streams at National Records of Scotland, we have determined that the risk of fraud arising from revenue recognition can be rebutted as there is deemed to be little incentive to manipulate revenue recognition and opportunities to manipulate revenue recognition are deemed to be limited.

Risk of Fraud in Expenditure (completeness) (As recommended in Practice Note 10)

As set out in practice note 10 (Revised 2020) ‘The Audit of Public sector Financial Statements’, issued by the Public Audit Forum, which applies to all public sector entities, we consider there to be an inherent risk of fraud in expenditure recognition.

National Records of Scotland’s expenditure includes both payroll and non-payroll costs. We consider payroll costs to be well forecast and are able to agree these costs to underlying payroll systems. As such, we believe there is less opportunity for a material misstatement as a result of fraud to occur in this area.

We therefore focus our risk on the following non-payroll expenditure streams: other operating expenditure and depreciation, amortisation and impairment. Our testing will include a specific focus on year end cut-off arrangements, including consideration of the existence of accruals and provisions, in relation to non payroll expenditure.

We will:

- Evaluate your accounting policy for recognition of expenditure for appropriateness and compliance with the FReM;
- Perform detail testing of expenditure transactions at and around year end to verify the accounting period transactions relate to and confirm that transactions have been recognised in the correct accounting period;
- Review the judgements and estimates made by management when recognising accruals and provisions at year end within the financial statements and where appropriate challenge management accordingly.

Significant audit risks (3)

Valuation of land and buildings (valuation)

This significant risk is one of the most significant assessed risks of material misstatement for the audit and a key audit matter.

In accordance with the HM Treasury Financial Reporting Manual (FReM), subsequent to initial recognition, National Records of Scotland is required to hold property, plant and equipment on a valuation basis. The valuation basis used will depend on the nature and use of the assets. Specialised land, buildings, equipment, installations and fittings are held at depreciated replacement costs, as a proxy for fair value. Non-specialised land and buildings, such as offices, are held at fair value.

National Records of Scotland appoint District Valuer Services (a division of the Valuation Office Agency) to undertake a rolling programme of valuations across their asset base, professionally valuing land and buildings at least once every five years with supplementary interim desktop valuations. As at 31 March 2022, National Records of Scotland held property, plant and equipment (PPE) of £17.909 million including land of £2.325 million and buildings of £10.942 million.

Given the significant value of the land and buildings held by National Records of Scotland, and the level of complexity and judgement involved in their estimation process, there is an inherent risk of material misstatement in the year end valuation of some of these assets. However, the risk is less prevalent in other assets as these are generally held at depreciated historical costs, as a proxy of fair value and therefore less likely to be materially misstated.

We will therefore focus our audit attention on assets that have large and unusual changes in valuations compared to last year and/or unusual approaches to their valuations, as a significant risk requiring special audit consideration. The risk will be pinpointed as part of our final accounts work, once we have understood the population of assets revalued. We will report an updated risk assessment for valuation of land and buildings in our Annual Audit Report.

Significant audit risks (4)

Valuation of land and buildings (valuation)

This significant risk is one of the most significant assessed risks of material misstatement for the audit and a key audit matter.

Our testing will include:

- Evaluating management's processes and controls for the calculation of the valuation estimates, the instructions issued to their management experts and the scope of their work;
- Evaluating the competence, capabilities and objectivity of the valuation expert;
- Writing to the valuer to confirm the basis on which the valuations were carried out;
- Challenge the information and assumptions used by the valuer to assess completeness and consistency with our understanding;
- Evaluating the valuer's report to identify assets that have large and unusual changes and/or approaches to the valuation – these assets will be substantially tested to ensure the valuations are reasonable;
- Testing, a sample of other asset revaluations made during the year to ensure they have been input accurately into the body's asset register and associated entries in the financial statements;
- Evaluating the assumptions made by management for any assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value;
- For any assets not formally revalued, evaluation the judgement made by management or others in the determination of the current value of these assets

Other risks identified

	Reason for risk identification	Key aspects of our proposed response to the risk
Implementation of IFRS 16	<p>IFRS 16 was implemented by central government bodies under the FReM from 1 April 2022. Under IFRS 16 a lessee is required to recognise right-of-use assets and associated lease liabilities in its Statement of Financial Position. This will result in significant changes to the accounting for leased assets and the associated disclosures in the financial statements in the year ended 31 March 2023.</p> <p>Further detail on the implications of this Accounting Standard is set out in the Appendices.</p>	<p>Our initial discussions with officers at National Records of Scotland, and our review of the predecessor auditor's work in 2021/22, have indicated that:</p> <ul style="list-style-type: none"> - National Records of Scotland has established systems and processes to capture the data required to account for right-of-use lease assets in accordance with IFRS 16 - revised its accounting policies for the year ended 31 March 2023 to reflect the requirements of this accounting standard. <p>We will assess the existence, accuracy and completeness of the right-of-use assets and associated lease liabilities, and the related disclosures, during our audit.</p>

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

Other matters (1)

Auditor Responsibilities

We have a number of audit responsibilities as set out in the Code and Planning Guidance 2022/23 issued by Audit Scotland:

- We audit parts of your Remuneration and Staff Report in your Annual Report and check whether these sections 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 the FReM (opinion).
- We consider our other duties under the Code and planning guidance (2022/23), as and when required, including:
 - Supporting Audit Scotland in Section 22 reporting
 - Providing regular updates to Audit Scotland to share awareness of current issues
 - Notifying Audit Scotland of any cases of money laundering or fraud
 - Review of Central Government Technical guidance prior to issue by Audit Scotland.

Going concern assessment

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

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

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

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

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

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

Other matters (2)

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 considered as part of our audit. However, the procedures will not be as extensive as the procedures adopted for the significant risks we have identified and highlighted in this Audit Plan.

Internal control environment

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

- Consider key business processes and related controls
- Assess the design of key controls over all significant risks we have identified. This will include key controls over: journal entries, valuation of land and buildings, operating expenditure and other material areas of management estimate and judgement

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

Audit handover

To facilitate effective audit planning and deliver an efficient audit we gain a detailed understanding of National Records of Scotland from discussions with key personnel at the entity, internal audit and the prior year auditor, attendance at Audit and Risk Committee meetings and review of key documents.

In line with Audit Scotland's Handover guidance, we seek to place as much assurance as possible on your previous auditor's work on your opening balances. We visited your previous auditor on the 13 March 2023 and reviewed their prior year audit working paper files.

We will consider any findings from this review on our risk assessment for the current year.

Financial reporting developments

During our audit, we will actively discuss emerging financial reporting developments with you. The key financial reporting development for 2022/23 central government audits is the implementation of IFRS16 from 1 April 2022, as set out on page 13 of this Audit Plan.

Other matters (3)

Progress against prior year audit recommendation

The predecessor auditor identified the following issues in their 2021/22 audit of National Records of Scotland's financial statements, which resulted in three recommendations being reported in their 2021/22 Annual Audit Report.

As part of our final accounts, we will follow up on the implementation of these prior year recommendations and report on progress against the recommendations in full within our Annual Audit Report. The responses at this stage for our plan is management's response.

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue (management response)
Ongoing	<p>1. Business Plans</p> <p>NRS has not published a Business Plan for 2022/23 and development of a longer-term business strategy has been delayed.</p> <p>Recommendation: NRS should ensure that Business Plans are up-to-date and continue their extensive on-going work to develop and conclude a longer-term business strategy.</p>	<p>The final detail of the NRS Annual Business Plan commitments for 2022/23 have been approved by NRS Executive Management Board and were published with the Annual Business Plan delivery evaluation for 2021/22 on 7th October.</p> <p>Work has concluded on the development of the draft long term strategy for NRS. CEO commenced staff engagement in June 2023, with associated stakeholder engagement materials. Comments being collated from teams across NRS through to late summer</p> <p>Target Operating Model and Capability map being finalised, following engagement and will be delivered in 2023/24 to inform delivery activities.</p>

Other matters (4)

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue (management response)
Ongoing	<p>2. Census</p> <p>NRS successfully launched the Census in March 2022, having delayed it from March 2021, as commented upon in the prior year Annual Audit Report. However the Census deadline was extended as it had achieved lower return rates than required. There is a risk that the Census outputs may be delayed or that the usefulness of the Census outputs are reduced due to the return rates received.</p> <p>Recommendation: NRS should continue to make progress with the planned work on analysing and validating Census results towards publication of first outputs to the planned timeframe. They should also conclude and share the lessons learned from the Census Programme delivery to date, and consider delivery plans of the remaining objectives to 2024/25, which includes planning for the next Census.</p>	<p>NRS has focused on the development and use of further administrative data to complement the data gathered through the census and census coverage survey within the estimation and imputation methodology. It has continued to take advice and direction from the RG's International Steering Group, with the intention of starting to deliver high quality census outputs in the financial year 2023/24, with first outputs in late August 2023, around one year from the end of the data collection phases.</p> <p>NRS has continued to learn from Census 2022. NRS Delivery Directorate have worked closely with the Census 2022 PMO and Commercial Team to transition knowledge, skills, documentation and processes important for both future Censuses and NRS-wide change initiatives.</p> <p>NRS is also incorporating findings into the recommendations for future Census options. An overarching General Report on Census 2022 will be laid with Scotland's Parliament in 2024, and around the same time recommendations on the approach for future census data collection will also be made by NRS to Scottish Ministers</p>

Other matters (5)

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue (management response)
Ongoing	<p>3. Embedding equality values</p> <p>NRS have the opportunity to embed equality values in the following key areas:</p> <ul style="list-style-type: none"> - Regular reporting to the EMB. - Consideration of more equality characteristics in its Mainstreaming Equalities Duty biennial report. - Carrying out equality impact assessments for significant projects or activities. - Providing Equality and Diversity refresher training to staff. <p>There is a risk NRS working arrangements or staff entitlements are adversely affected if equality and diversity values are not properly considered.</p> <p>Recommendation: Management should consider the improvements recommended at paragraph 78 of the 2019/20 Annual Audit Report.</p>	<p>1) Reporting: NRS' Delivery Director is the executive Equalities Champion taking lead to ensure a periodic assessment of strategic objectives and equality outcomes are discussed at EMB. All to be formally reviewed and updated every 2 years as required.</p> <p>2) Protected characteristics: Commitment to further consultation with Scottish Government (SG) to ascertain whether NRS can utilise the additional protected characteristics information SG hold for use in future NRS equalities reports.</p> <p>3) Impact assessments: Ongoing improvement and consistent use of Equality Impact Assessments (EQIA) across NRS. Equalities Champion to leverage existing EQIA arrangements, such as those used by the Census programme and expand use across other NRS core activities. Consider inclusion of EQIA in key decisions and business cases.</p> <p>4) Training: We continue to provide equality, diversity and inclusion training to all new members of staff. All hiring managers and interview panellists are also required to complete an inclusive recruitment e-learning package. We have now developed advice and guidance to support colleagues with the completion of equality related impact assessments.</p> <p>The development of an "Equalities Day" has been delayed due to the transition of our intranet from Connect to Saltire in June 2023. To ensure that this days is held out with the summer holiday period, it is proposed that this event be developed and promoted in the Autumn 2023.</p>

Wider scope risks identified in planning (1)

Our responsibilities under the Code extend beyond the audit of the financial statements. The Code sets out four audit dimensions that frame wider scope into identifiable areas. These four dimensions have been slightly amended in the 2021 Code as shown in the table below.

2016 Code	2021 Code
Financial Sustainability	Financial Sustainability
Financial Management	Financial Management
Governance and transparency	Vison, Leadership and Governance
Value for Money	Use of Resources to Improve Outcomes

The Code also requires that auditors assess and report on audited bodies' performance in meeting their Best Value and duties, as part of their annual audit. For central government bodies, we are required to consider the arrangements put in place by Accountable Officers to meet their Best Value obligations as part of our risk-based wider-scope audit work.

We consider each of these areas through our audit planning process and have set out below the identified areas of risk for our wider scope work. From our initial planning work, we have identified a significant risk in relation to Financial Sustainability and Use of Resource to Improve Outcomes. We have not identified risks in relation to Financial Management or Vision, Leadership and Governance from our initial planning work. We will continue to review your arrangements before we issue our Annual Report.

Financial sustainability

Significant risk work area – future financial plans for 2023/24 and beyond

For 2022/23, the revised spring budget, as set out within the Scottish Budget was £62.9m. For 2023/24, the Scottish Budget was laid before the Scottish Parliament in December 2022 and indicated that the budget for National Records for Scotland would be £33m.

Wider scope risks identified in planning (2)

Financial sustainability - continued

National Records of Scotland implement an annual business plan, however, the plan for 2022/23 was not issued until later in the year and there are no formalised medium to long-term financial plans. Without forward looking plans, the financial sustainability of the organisation is difficult to forecast and the use of key assumptions, scenario planning, sensitivity analysis and risk analysis is more difficult to evidence.

We will seek to understand the future financial forecasts and plans for National Records of Scotland for 2023/24 and beyond, including key assumptions used, scenario planning, sensitivity analysis, risk analysis and the extent of any budget pressures and impact upon reserves. We will also consider the action National Records of Scotland is taking to address identified funding gaps and associated savings plans.

Financial management

We have not identified a risk in relation National Records of Scotland's financial management from our initial planning work. As at January 2023, National Records of Scotland reported a forecast underspend against budget of £0.4m for both their Corporate budget and Census Budget, bringing a combined projected revenue underspend of £0.8m. An underspend of £0.2m is also projected in Capital spend.

In May 2022, it was announced that additional budget investment of up to £9.8 million would be made available to National Records of Scotland in 2022/23, to cover the extension of the Census Collection. However, National Records of Scotland were only allocated a budget of £4.0 million to cover expenditure as a corporate transfer with the remainder absorbed from budgets in-year, whereby plans had to be adjusted in order to realise further savings. As at January 2023, the final outturn was approximately £5.9m.

We will seek to understand the effectiveness of National Records of Scotland's effectiveness of the budgetary control system in communicating accurate and timely financial performance, including the arrangements for identifying, monitoring and reporting of savings. We will consider the overall financial position reached by National Records of Scotland and we will seek to understand the future financial implications of this.

Wider scope risks identified in planning (3)

Vision, Leadership and Governance

An interim Chief Executive Officer was appointed to National Records of Scotland in February 2023, who was previously the Accountable Officer for Registers of Scotland. As part of our wider scope work, we review the activities being undertaken by National Records of Scotland in appointing a permanent Officer.

We recognise the impact this may have on the future direction of the organisation, but have not identified a risk at this stage in relation National Records of Scotland's arrangements for vision, leadership and governance from our initial planning work. We will continue to review your arrangements before we issue our Annual Report. Our work will also include reviewing the consistency of your Governance Assurance Statement with the key findings from audit, scrutiny, and inspection.

Use of Resources to Improve Outcomes

Significant risk work area – Lessons learned from the 2022 Census

In November 2021, the Auditor General for Scotland issued a Section 22 report for 2020/21 under the Public Finance and Accountability (Scotland) Act (2000) detailing how Scotland's Census had faced considerable challenges and careful management was required to ensure its successful delivery in March 2022. Following this, in November 2022, a Section 22 report for 2021/22 was issued concluding that there had been lower-than-expected return rates for the Census which resulted in a decision to delay the deadline for submission of return until the end of May 2022 however, this has caused additional programme costs for the organisation. The report stated resultantly, National Records of Scotland will be increasingly reliant on the use of administrative data and that the organisation must now reflect on how the results of the 2022 census and those conducted around the world will impact on its approach to future censuses.

Scottish Government's Constitution, Europe, External Affairs and Culture Committee have launched an inquiry into Scotland's Census with the following remit: "to examine the outcome of the Census, focusing on the quality of the data collected, identifying any gaps and how they could be filled". The Committee have received oral evidence from officers within National Records for Scotland in June and September 2022 where updated actions have been reported and this is expected to continue during the course of 2023.

Wider scope risks identified in planning (4)

Use of Resources to Improve Outcomes (continued)

We will review National Record of Scotland's progress at following up on the recommendations of Audit Scotland in their 2021/22 Annual Audit Report and the 2021/22 Section 22 report issued by the Auditor General. We will seek to understand the lessons learned from the 2022 census, and how these will be applied to the next census in 2031. The first outputs from the Census are due in the summer of 2023 and we will review the arrangements that National Records of Scotland had to deliver expected timelines to the required standards.

Other wider scope areas

In addition to the wider scope risks set out above, Audit Scotland's Planning Guidance 2022/23 requires us to consider we will consider the following national risks as part of our wider Scope work:

- Climate change – Auditors are required to provide answers to six specified questions in a mandated return to Audit Scotland and include appropriate reference in our Annual Audit Report.
- Cyber security – Auditors are required to consider risks related to cyber security at audited bodies as part of their work on the financial statements audit in line with guidance issued by Audit Scotland's Digital Audit Team. As required by the planning guidance we will to report any significant incidents, issues or areas of good practice to Audit Scotland's Digital Audit team .

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.

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

Audit fees were shared by Audit Scotland with National Records of Scotland in December 2022 and was approved at the Audit and Risk Committee on the 27th June 2023 by the Director of Corporate Services. Audit fees are paid to Audit Scotland who in turn pay us. We reserve the right to review our fee during the audit should significant delays be encountered and/or new technical matters arise.

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.

The baseline fee of £69,820 set by Audit Scotland. In accordance with Audit Scotland guidance, we are able to discuss a variation to the audit fee where additional work is required. We may need to engage an auditor's expert due to the valuation of land and building. This will not be fully determined until the outcome of our understanding of the valuation process and a review of the valuations undertaken. Any increase in audit fee would be subject to agreement with National Records of Scotland and the final audit fee would be confirmed within our Annual Audit Report.

Audit Fees (continued)

Audit fees for 2022/23

Service	Fees £
External Auditor Remuneration	£68,410
Pooled Costs	£4,540
Contribution to Audit Scotland support costs	£2,410
Contribution to Performance Audit and Best Value	Nil
Sectoral cap adjustment	-£5,540
2022/23 Fee	£69,820

Additional Fees (Non-Audit Services)

Service	Fees £
At the planning stage, we confirm there are no planned non-audit services	Nil

Fee assumptions

In setting the fee for 2022/23, we have assumed that you 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 for all critical and significant judgements and estimates 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
- ensure that all appropriate staff, including valuation experts are available to us for queries over the planned period of the audit, or as otherwise agreed.

Adding value through the audit

Our overall approach to adding value through the audit is clear and upfront communication, founded on our public sector credentials and our LEAP audit methodology and use of data analytics to ensure delivery of a quality audit.

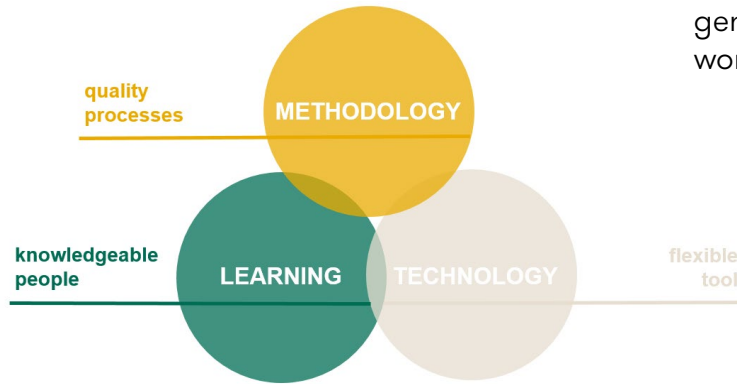
Our audit methodology is risk based and includes developing a good understanding of National Records of Scotland. The diagram opposite summarises how our methodology and use of data adds value to our audit.

We comply with UK Auditing Standards and as a Firm we are regulated by the FRC. We take findings on audit quality seriously and continue to invest through our Audit Investment Plan, which is supported by a specific national Public Sector Investment Plan.

We comply with Audit Scotland's quality arrangements, including submitting an Annual Quality Report on our Audit Scotland portfolio. Audit Scotland's quality report for 2021/22 can be found on the [Audit Scotland website](#).

Our wider quality arrangements are set out in our annual transparency reports which are available on our website here: [Annual report 2021](#).

Use of audit, data interrogation and analytics software



LEAP

- A globally developed ISA-aligned methodology that re-engineers our audit approach to focus on quality and effectiveness
- LEAP empowers our engagement teams to deliver even higher quality audits, enables our teams to perform effective audits which are scalable to any client, enhances the work experience for our people and develops further insights into our clients' businesses
- The LEAP approach allows us to tailor the audit programme to help engagement teams respond quickly to any changes as they occur, keeping quality high through responsiveness and flexibility.

LEAP

Info



Cloud based software which uses data analytics to identify trends and high risk transactions, generating insights to focus audit work and share with clients.



REQUEST AND SHARE

- Communicate and transfer documents securely; Extract data directly from client systems; Work flow assignment and progress monitoring



ASSESS AND SCOPE

- Compare balances and visualise trends; Understand trends and perform more granular risk assessment



VERIFY AND REVIEW

- Automate sampling; Download automated work papers



INTERROGATE AND EVALUATE

- Analyse 100% of transactions quickly and easily; Identify high risk transactions for investigation and testing; Provide client reports and relevant benchmarking KPIs



FOCUS AND ASSURE

- Visualise relationships impacting core business cycles; Analyse 100% of transactions to focus audit on unusual items; Combine business process analytics with related testing to provide greater audit and process assurance



INSIGHTS

- Detailed visualisations to add value to meetings and reports

Appendices

Independence	27
Responsibilities	28
Communication	29
Fraud responsibilities	30
IT audit strategy	32
Right of Use Assets – IFRS 16	34
Future auditing developments	35

Independence

Auditor independence

Ethical Standards and ISA (UK) 260 'Communication with Those Charged With Governance' 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 any independence issues, with us and will discuss the matter with you if we make any significant judgements surrounding independence matters.

We confirm that there are no significant facts or matters that impact on our independence as auditors of National Records of Scotland that we are required to report 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 2019 Ethical Standard.

Our team complete annual fit and proper declarations, including independence confirmations, as well as confirming independence from individual audited bodies when completing timesheets. The work of our Ethics team is overseen by our Ethics partner and all staff undergo regular ethics training each year.

We confirm we are independent of National Records of Scotland.

Non-audit services provided prior to appointment

Ethical Standards require us to draw your attention to relevant information on recent non-audit / additional services before we were appointed as auditor. We did not provide any non-audit or additional services to National Records of Scotland prior to our appointment as auditors.



Responsibilities

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

National Records of Scotland

Your responsibilities include:

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

External Audit

Our responsibilities include:

- Compliance with the FRC Ethical Standard
- Compliance with the Code and UK Auditing Standards (ISA's UK) in the conduct and reporting of our financial statements audit
- Compliance with the Code and guidance issued by Audit Scotland in the conduct and reporting of our wider scope work
- Providing assurance on specified returns and other outputs (where required), as specified in guidance issued by Audit Scotland
- Liaison with and notifying Audit Scotland when circumstances indicate a statutory report may be required.
- Contributing to relevant performance studies (as set out in Audit Scotland's Planning Guidance for 2022/23).



Communication

ISA (UK) 260 'Communication with Those Charged With Governance', as well as other ISAs set out prescribed matters which we are required to report to those charged with governance (the Audit and Risk Committee). Our reporting responsibilities are set out below. We communicate all matters affecting the audit on a timely basis, to management and/or the Audit and Risk Committee.

	Audit Plan	Annual Report (our ISA 260 Report)
Our communication plan		
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	•	•
Matters in relation to the group audit, including: Scope of work on components, involvement of group auditors in component audits, concerns over quality of component auditors' work, limitations of scope on the group audit, fraud or suspected fraud	•	•
Views about the qualitative aspects of National Records of Scotland'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

ISA (UK) 240 (Revised May 2021) 'The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements' came into force for accounting periods commencing on or after 15 December 2021. The first year this impacted on National Records of Scotland was the year ended 31 March 2023. Requirements in ISA (UK) 240 (Revised May 2021) have been enhanced for the identification and assessment of risks of material misstatement due to fraud and the response to those risks.

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 National Records of 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 National Records of Scotland'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.

As auditors, we are required to obtain reasonable assurance that the financial statements taken as a whole are free from material misstatement, whether caused by fraud or error. Due to the inherent limitations of an audit, there is an unavoidable risk that some material misstatements of the financial statements may not be detected, even though the audit is properly planned and performed in accordance with the ISAs (UK).

As part of our risk assessment procedures, we are required to:

- identify and assess the risks of material misstatement in the financial statements due to fraud, including financial misreporting and misappropriation of assets.
- hold separate discussions with management, those charged with governance and others (as appropriate) to gain insights on their views of fraud.

Fraud responsibilities (continued)

During our audit work we will:

- design and implement appropriate audit procedures to respond to the risks of misstatement we have identified and reported in this Audit Plan
- remain alert to new risks and amend our risk assessments accordingly
- respond appropriately to any risks identified.

Throughout the audit we work with you to consider the significant risks we identify, 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. We will report to you any significant deficiencies we identify.

In addition, as set out in the Audit Scotland Planning Guidance 2022/23 ,we are required to:

- provide information on fraud cases to Audit Scotland on a quarterly basis
- communicate emerging issues to Audit Scotland, and
- contribute to the National Fraud Initiative report

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 Audit Scotland Planning Guidance for 2022-23) 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 National Records of Scotland we will report to the Auditor General as required by Audit Scotland.

IT audit strategy

ISA (UK) 315 (Revised July 2020): Identifying and Assessing the Risks of Material Misstatement Through Understanding of the Entity and its Environment' came into force for accounting periods commencing on or after 15 December 2021. The first year this impacted on National Records of Scotland was the year ended 31 March 2023.

We are required to obtain an understanding of the information systems relevant to financial reporting to identify and assess the risks of material misstatement. As part of this we obtain an understanding of the controls operating over relevant Information Technology (IT) systems i.e., IT general controls (ITGCs). The revised requirements in ISA (UK) 315 (Revised July 2020) include:

Key changes

- An emphasis has been added on the need for auditors to not bias their work toward obtaining corroborative evidence or excluding evidence that is contradictory.
- The concept of 'inherent risk factors' has been introduced to assist the auditor in identifying events or conditions that may affect the susceptibility of assertions about classes of transactions, account balances or disclosures to misstatement.
- A new concept of significant classes of transactions, account balances or disclosures refers to those classes for which there are assertions with an identified risk of material misstatement (referred to as relevant assertions).
- A new concept of spectrum of inherent risk applies to the extent to which inherent risk varies.
- Significant risk relates to an identified risk of material misstatement for which the assessment of inherent risk is close to the upper end of the spectrum due to the affect of inherent risk factors on the combination of the likelihood of a misstatement and the magnitude.
- A requirement for auditors to understand the entity's use of IT in its business, the related risks and the system of internal control addressing such risks. (Guidance is being provided from Audit Scotland's Digital Auditing team to assist auditors in this regard).

During our audit we will complete an assessment of the design and implementation of relevant ITGCs.

IT audit strategy (continued)

The following IT systems have been judged to be in scope for our audit and based on the planned financial statement audit approach we will perform the indicated level of assessment:

IT system	Audit area	Planned level IT audit assessment
SEAS	Financial Reporting	<ul style="list-style-type: none"> • Review of Service Auditor Reports • ITGC Assessment
EASEbuy	Operating Expenditure	<ul style="list-style-type: none"> • ITGC Assessment
Real Asset Management	Property, Plant and Equipment	<ul style="list-style-type: none"> • ITGC Assessment
Britannia	Property, Plant and Equipment	<ul style="list-style-type: none"> • ITGC Assessment

Right of Use Assets - IFRS 16 implementation

IFRS 16 was implemented by Scottish central government bodies from 1 April 2022. This Accounting Standard sets out the principles for the recognition, measurement, presentation and disclosure of leases and replaces IAS17. The objective is to ensure that lessees and lessors provide relevant information in a manner that faithfully represents those transactions. This information gives a basis for users of financial statements to assess the effect that leases have on the financial position, financial performance and cash flows of an entity.

Introduction

Following the previous deferrals of IFRS 16 Leases *in the public sector*, Scottish Government has worked with central government bodies in Scotland in the implementation of this new accounting standard. It came into force for Scottish central government bodies on 1 April 2022.

IFRS 16 updates the definition of a lease to “a contract, or part of a contract, that conveys the right to use an asset (the underlying asset) for a period of time in exchange for consideration.” In the public sector the definition of a lease is expanded to include arrangements with nil consideration”.

IFRS 16 requires all leases to be accounted for 'on balance sheet' by the lessee (subject to a number of exemptions, as set out below.)

Key points that National Records of Scotland will need to consider in their financial statements in 2022/23 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. (Prior year comparators do not need to be restated).
- 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 is less than 12 months.

- 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.

National Records of Scotland's systems and processes

Where relevant, central government bodies will need to reflect the effect of IFRS 16 changes in the following areas:

- accounting policies and disclosures
- application of judgment and estimation
- related internal controls that will require updating, if not overhauling, to reflect changes in accounting policies and processes
- systems to capture the process and maintain new lease data and for ongoing maintenance

Planning inquiries

As part of our planning risk assessment procedures, we have made inquiries to management via the 'Informing the Risk Assessment' document and this will be shared with the Audit and Risk Committee to confirm accuracy.

Future auditing developments

There are changes to the following ISAs (UK) which will impact on our central government audits for the first time in future years.

Revised standards applicable for audits of financial statement for periods commencing on or after 15 December 2022.:

- ISQM (UK) 2 (Issued July 2021) 'Engagement Quality Reviews'
- ISA (UK) 220 (Revised July 2021) 'Quality Management for an Audit of Financial Statements'

Revised standards applicable for audits of financial statement for periods commencing on or after 15 December 2023.

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

Area of change	Impact of changes
Quality control	<ul style="list-style-type: none"> • ISQM 2 deals with the appointment and eligibility of the engagement quality reviewer (EQR) and the EQRs responsibilities relating to the performance and documentation of an engagement quality review. • The objective of the firm, through appointing an EQR, is to perform an objective evaluation of the significant judgments made by the engagement team and the conclusions reached thereon. • The objective of the auditor is to implement quality control procedures at the engagement level that provide the auditor with reasonable assurance that the audit complies with professional standards and applicable legal and regulatory requirements; and the auditor's report issued is appropriate in the circumstances.
Direction, supervision and review of the engagement	<ul style="list-style-type: none"> • 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.
Documentation	<ul style="list-style-type: none"> • The amendment to these auditing standards will result in additional documentation requirements to demonstrate how these requirements of these revised standards have been addressed.

