Standards Commission for Scotland

Annual Audit Plan 2022/23





Prepared for Standards Commission for Scotland

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Introduction

Summary of planned audit work

- 1. This document summarises the work plan for our 2022/23 external audit of the Standards Commission for Scotland (SCfS). The main elements of our work include:
 - an audit of the annual report and accounts, and provision of an Independent Auditor's Report
 - an audit opinion on regularity and other statutory information published within the annual report and accounts including the Performance Report, the Governance Statement and the Remuneration and Staff Report
 - consideration of arrangements in relation to wider scope areas: financial sustainability, and vision, leadership and governance
 - consideration of Best Value arrangements.

Audit Appointment

- 2. We are pleased to be appointed as the external auditor of the SCfS for the period 2022/23 to 2026/27 inclusive. You can find a brief biography of your audit team at Appendix 1.
- 3. In the first year of the audit appointment, we invest significant time gaining an understanding of your business and identifying and assessing the risks of material misstatement to the financial statements. While we use our initial assessment of risk to inform our planned audit approach, we keep our assessment of risks under review as the audit progresses. We will inform you of any significant changes in assessed risks and any resulting changes in our planned audit work.
- **4.** The audit team will actively engage with you over the course of the audit to ensure our audit work continues to be focused on risk.

Adding value

5. We aim to add value to the SCfS through our external audit work by being constructive and forward looking, by attending meetings of the Audit and Risk Committee and by recommending and encouraging good practice. In so doing, we will help the SCfS promote improved standards of governance, better management and decision making and more effective use of resources.

Respective responsibilities of the auditor and Audited Body

6. The Code of Audit Practice 2021 sets out in detail the respective responsibilities of the auditor and the SCfS. The key responsibilities are summarised below.

Auditor responsibilities

- 7. Our responsibilities as independent auditors are established by the Public Finance and Accountability (Scotland) Act 2000 and the Code of Audit Practice (including supplementary guidance) and guided by the Financial Reporting Council's Ethical Standard.
- **8.** Auditors in the public sector give an independent opinion on the financial statements and other information within the annual report and accounts. We also review and report on the wider scope arrangements in place at the SCfS. In doing this, we aim to support improvement and accountability.

SCfS responsibilities

- 9. The SCfS is responsible for maintaining accounting records and preparing financial statements that give a true and fair view.
- **10.** The SCfS has the primary responsibility for ensuring the proper financial stewardship of public funds, compliance with relevant legislation and establishing effective arrangements for governance, propriety and regularity that enable it to deliver its objectives.

Financial statements audit planning

Introduction

- 11. The annual report and accounts are an essential part of demonstrating the SCfS's stewardship of resources and its performance in the use of those resources.
- **12.** We focus our work on the areas of highest risk. As part of our planning process, we assess any audit risks in the main financial systems relevant to the production of the financial statements.

Materiality

13. The concept of materiality is applied by auditors in planning and performing the audit, and in evaluating the effect of any uncorrected misstatements on the financial statements. We are required to plan our audit to obtain reasonable assurance that the financial statements are free from material misstatement. The assessment of what is material is a matter of professional judgement over both the amount and the nature of the misstatement.

Materiality levels for the 2022/23 audit

14. We assess materiality at different levels as described in Exhibit 1. The materiality values for SCfS are set out in Exhibit 1.

Exhibit 1 2022/23 Materiality levels for SCfS

Materiality	Amount
Planning materiality – This is the figure we calculate to assess the overall impact of audit adjustments on the financial statements. Materiality has been set based on our assessment of the needs of the users of the financial statements and the nature of the SCfS's operations. For the year ended 31 March 2023 we have set our materiality at 2% of gross expenditure based on the audited financial statements for 2021/22.	£6,400
Performance materiality – This acts as a trigger point. If the aggregate of errors identified during the financial statements audit exceeds performance materiality, this could indicate that further audit procedures should be considered. Using our professional judgement, we have assessed performance materiality at 75% of planning materiality.	£4,800

Reporting threshold (ie clearly trivial) – We are required to report to those charged with governance on all unadjusted misstatements more than the 'reporting threshold' amount.

£1,000

Source: Audit Scotland

Significant risks of material misstatement to the financial statements

- **15.** Our risk assessment draws on our cumulative knowledge of the SCfS, its major transaction streams, key systems of internal control and risk management processes. It is informed by our discussions with management, meetings with internal audit, attendance at committees and a review of supporting information.
- **16.** Audit risk assessment is an iterative and dynamic process. Our assessment of risks set out in this plan may change as more information and evidence becomes available during the progress of the audit. Where such changes occur, we will advise management and where relevant, report them to those charged with governance.
- **17.** Based on our risk assessment process, we identified the following significant risk of material misstatement to the financial statements. This risk has the greatest impact on our planned audit procedures. Exhibit 2 summarises the nature of the risk, the sources of assurance from management arrangements and the further audit procedures we plan to perform to gain assurance over the risk.

Exhibit 2 2022/23 Significant risks of material misstatement to the financial statements

Significant risk of material misstatement	Sources of assurance	Planned audit response
1. Risk of material misstatement due to fraud caused by the management override of controls As stated in International Standard on Auditing (UK) 240, management is in a unique position to perpetrate fraud because of	Owing to the nature of this risk, assurances from management are not applicable in this instance	 Make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments. Detailed testing of journal entries. Review of accounting estimates and judgements. Focused testing of accruals and prepayments. Evaluation of significant transactions that are outside the normal course of business.

Significant risk of material misstatement	Sources of assurance	Planned audit response
management's ability to override controls that otherwise appear to be operating effectively.		

Source: Audit Scotland

- 18. As set out in International Standard on Auditing (UK) 240: The auditor's responsibilities relating to fraud in an audit of financial statement, there is a presumed risk of fraud over the recognition of revenue. There is a risk that revenue may be misstated resulting in a material misstatement in the financial statements. We have rebutted this presumed risk due to the nature of the funding being funds drawn down from the Scottish Parliamentary Corporate Body.
- **19.** In line with Practice Note 10: Audit of financial statements and regularity of public sector bodies in the United Kingdom, as most public-sector bodies are net spending bodies, the risk of material misstatement due to fraud related to expenditure recognition may in some cases be greater than the risk relating to revenue recognition. We have rebutted this risk for the SCfS as the main expenditure stream relates to payroll costs which are readily forecast based on a predictable pattern of costs. Other expenditure incurred by the SCfS is comprised of a low volume of transactions and there would be limited opportunity to manipulate the financial statements.
- 20. We have not, therefore, incorporated specific work into our audit plan in these areas over and above our standard audit procedures.

Wider Scope and Best Value

Introduction

- 21. The Code of Audit Practice sets out the four areas that frame the wider scope of public sector audit: financial management; financial sustainability; vision, leadership and governance; and use of resources to improve outcomes. The Code of Audit Practice requires auditors to consider the adequacy of the arrangements in place for the wider scope areas in audited bodies.
- **22.** Due to the nature of the SCfS, including the low volume and lack of complexity of financial transactions, we plan to apply the less complex bodies provision to the 2022/23 audit of the SCfS.
- 23. Under the less complex bodies provision our wider scope work will be limited to:
 - **Financial sustainability -** as auditors, we consider the appropriateness of the use of the going concern basis of accounting as part of the annual audit. We will also comment on financial sustainability in the medium term (two to five years) and longer term (longer than five years).
 - Vision, leadership and governance we conclude on the arrangements in place to deliver the vision, strategy and priorities adopted by the SCfS. We also consider the effectiveness of the governance arrangements.
 - **Cyber security -** there continues to be a significant risk of cyber-attacks to public bodies and a number of recent incidents have demonstrated the significant impact they can have on both the finances and operation of an organisation. In 2022/23, we will consider the SCfS's arrangements for managing and mitigating cyber security risks.
- **24.** We have not identified any risks in relation to wider scope.

Duty of Best Value

25. Ministerial Guidance to Accountable Officers for public bodies and the Scottish Public Finance Manual (SPFM) explain that accountable officers have a specific responsibility to ensure that arrangements have been made to secure Best Value. We will be carrying out a high-level review to confirm that such arrangements are in place within SCfS.

Reporting arrangements, timetable, and audit fee

Reporting arrangements

- **26.** Audit reporting is the visible output for the annual audit. All audit outputs on matters of public interest will be published on our website: www.auditscotland.gov.uk.
- 27. Matters arising from our audit will be reported on a timely basis and will include agreed action plans. Draft management reports will be issued to the relevant officers to confirm factual accuracy.
- 28. We will provide an independent auditor's report to the SCfS, the Scottish Parliament and the Auditor General for Scotland setting out our opinions on the annual report and accounts. We will provide the SCfS and the Auditor General for Scotland with an annual report on the audit containing observations and recommendations on significant matters which have arisen during the audit.
- 29. Exhibit 3 outlines the target dates for our audit outputs, and we aim to issue the independent auditor's report by the statutory deadline of 31 October 2023.

Exhibit 3 2022/23 Audit outputs

Audit Output	Target date	Audit and Risk Committee Date
Annual Audit Plan	31/03/2023	*(no meeting date)
Independent Auditor's Report	31/10/2023**	25/07/2023
Annual Audit Report	31/10/2023**	25/07/2023

Source: Audit Scotland

^{*} The SCfS Audit and Risk Committee does not meet before 31 March 2023. The SCfS Executive Director will distribute the Annual Audit Plan to non-executive members separately. **These dates represent the date for the independent auditor's report to be signed and the final annual audit report issued per the planning guidance. We will provide copies to those charged with governance in advance of the July committee to enable them to be considered.

Timetable

- **30.** To support an efficient audit, it is critical that the timetable for producing the annual report and accounts for audit is achieved. We have included a proposed timetable for the audit at Exhibit 4 that has been discussed with management.
- **31.** Covid-19 has had a considerable impact on the conduct and timeliness of the audit. We recognise that it is in the best interests of public accountability to get the reporting of audited accounts back to pre-pandemic timelines. We are identifying ways to work more efficiently to expedite the 2022/23 audits whilst at the same time maintaining high standards of quality.
- **32.** We intend to take a hybrid approach to the 2022/23 audit with a blend of onsite and remote working. We will continue to work closely with management to identify the most efficient approach as appropriate and will keep timeframes and logistics for the completion of the audit under review. Progress will be discussed with management and finance officers over the course of the audit.

Exhibit 4 Proposed annual report and accounts timetable

⊘ Key stage	Provisional Date
Consideration of the unaudited annual report and accounts by those charged with governance	23 May 2023
Latest submission date for the receipt of the unaudited annual report and accounts with complete working papers package.	01 June 2023
Latest date for final clearance meeting with the Executive Director and Office Manager	19 July 2023 (tbc)
Issue of draft Letter of Representation and proposed Independent Auditor's Report	20 July 2023
Agreement of audited and unsigned annual report and accounts	20 July 2023
Issue of Annual Audit Report to those charged with governance.	20 July 2023
Signed Independent Auditor's Report	25 July 2023

Audit fee

Source: Audit Scotland

33. In determining the audit fee, we have taken account of the risk exposure of the SCfS and the planned management assurances in place. The agreed audit fee for 2022/23 is £3.730.

- 34. Our fees have increased in 2022/23 and this is a reflection of the current audit market and the rising costs in delivering high quality audit work. There are increased regulatory expectations and risks placed on audit and its quality, as well as a widening in the scope of work audit must cover.
- **35.** In setting the fee for 2022/23 we have assumed that the SCfS has effective governance arrangements and will prepare comprehensive and accurate accounts for audit in line with the agreed timetable for the audit. The audit fee assumes there will be no major change in respect of the scope of the audit during the year and where our audit cannot proceed as planned, a supplementary fee may be levied.

Other matters

Internal audit

- **36.** It is the responsibility of the SCfS to establish adequate internal audit arrangements. We will review the internal audit plan and the results of internal audit's work.
- **37.** While we are not planning to place formal reliance on the work of internal audit in 2022/23, we will review internal audit reports and assess the impact of the findings on our financial statements and wider scope audit responsibilities.

Independence and objectivity

- **38.** Auditors appointed by the Auditor General for Scotland or Accounts Commission must comply with the Code of Audit Practice and relevant supporting guidance. When auditing the financial statements, auditors must also comply with professional standards issued by the Financial Reporting Council and those of the professional accountancy bodies. These standards impose stringent rules to ensure the independence and objectivity of auditors.
- **39.** Audit Scotland has robust arrangements in place to ensure compliance with these standards including an annual 'fit and proper' declaration for all members of staff. The arrangements are overseen by the Executive Director of Innovation and Quality, who serves as Audit Scotland's Ethics Partner.
- **40.** The appointed auditor for the SCfS is Liz Maconachie, Senior Audit Manager. Auditing and ethical standards require the appointed auditor to communicate any relationships that may affect the independence and objectivity of audit staff. We are not aware of any such relationships pertaining to the audit of the SCfS.

Audit Quality

- **41.** Quality is at the core of public audit in Scotland and is the foundation for building consistency and confidence across all audit work. High quality audits provide assurance, add value and can support public bodies to achieve their objectives.
- **42.** Until 2021/22, the applicable audit quality standard was International Standard on Quality Control 1 (ISQC (UK) 1). This set out an audit practice's responsibilities for its system of quality control for audits.
- **43.** ISQC(UK) 1 has been replaced by two new audit quality standards: Internal Standards on Quality Management (ISQM (UK) 1) applicable from 15 December 2022 and (ISQM(UK) 2) effective for the 2023/24 audits. Work is underway at Audit Scotland to meet the requirements of these quality standards.

- **44.** Audit Scotland is committed to delivering high quality audits. The foundation of our quality framework is our Audit Guide, which incorporates the application of professional auditing, quality and ethical standards and the Code of Audit Practice (and supplementary guidance) issued by Audit Scotland and approved by the Auditor General for Scotland. To ensure that we achieve the required quality standards, Audit Scotland conducts peer reviews and internal quality reviews. Additionally, the Institute of Chartered Accountants of England and Wales (ICAEW) have been commissioned to carry out external quality reviews.
- **45.** As part of our commitment to quality and continuous improvement, Audit Scotland will periodically seek your views on the quality of our service provision. We welcome feedback at any time, and this may be directed to the engagement lead.

Appendix 1. Your audit team

46. The audit team involved in the audit of the SCfS have significant experience in public sector audit.

Liz Maconachie

Senior Audit Manager Imaconachie@auditscotland.gov.uk

Gillian McCreadie

Senior Auditor gmccreadie@auditscotland.gov.uk

Joan Dalgleish

Auditor jdalgleish@audit-scotland.gov.uk

Matthew Cronin

Trainee Auditor mcronin@audit-scotland.gov.uk Liz has over 25 years of public sector audit experience and has delivered external audit services to a range of bodies including local authorities, health boards and central government bodies.

Gillian McCreadie has considerable experience in planning and delivering audits. Gillian will manage the team and work alongside the Senior Audit Manager to deliver the audit.

Joan has over 20 years of audit experience. She has worked on a range of audits covering health, central government and local government.

Matthew is a professional trainee and is currently studying for his ICAS qualification. Matthew has worked on health and central government audits.

47. The local audit team is supported by a specialist technical accounting team, all of whom have significant experience of public bodies and work with accounting regulatory bodies.

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Audit Scotland's published material is available for download on the website in a number of formats. For information on our accessibility principles, please visit:

www.audit-scotland.gov.uk/accessibility

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