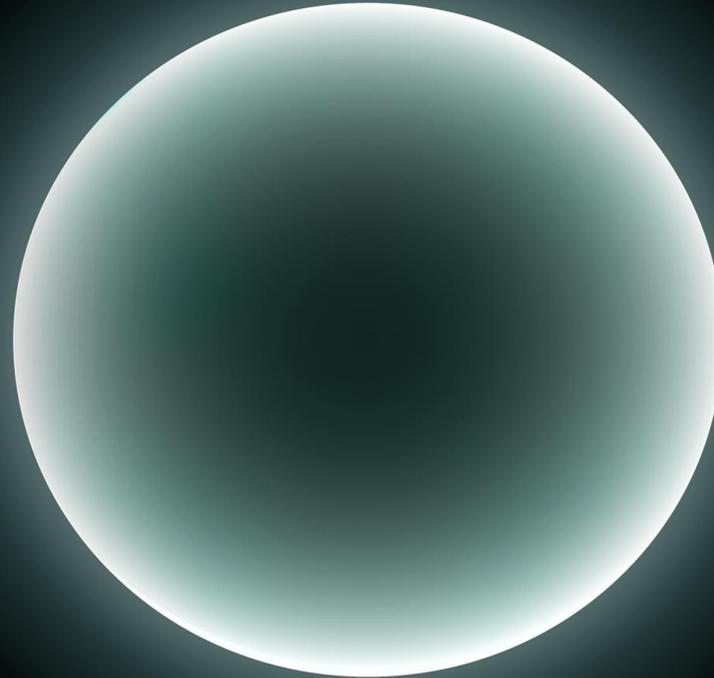


Deloitte.



Scottish Information
Commissioner
it's public knowledge



Scottish Information Commissioner

Report to the Commissioner and the Auditor General for Scotland on the 2020/21
audit

Issued on 13 September for the meeting on 21 September 2021

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Introduction

The key messages in this report

Audit quality is our number one priority. We plan our audit to focus on audit quality and have set the following audit quality objectives for this audit:

- A robust challenge of the key judgements taken in the preparation of the financial statements.
- A strong understanding of your internal control environment.
- A well planned and delivered audit that raises findings early with those charged with governance.

I have pleasure in presenting our final report to the Commissioner for the year ending 31 March 2021 audit of the Scottish Information Commissioner ('the Commissioner'). The scope of our audit was set out within our planning report presented to the Audit Advisory Board (AAB) in February 2021.

This report summarises our findings and conclusions in relation to:

- The audit of the **financial statements**; and
- Consideration of the wider scope requirements of public sector audit. As set out in our plan, in line with previous years, we have concluded that the full application of the wider scope is not appropriate and have applied the "small body" clause set out in the Code which allows narrower scope work to be carried out. We have updated our risk assessment during the audit and confirm that the judgement made in our audit plan has not changed. Our work in this area was restricted to concluding on:
 - The appropriateness of the disclosures in **the governance statement**; and
 - The **financial sustainability** of the Commissioner and the services that it delivers over the medium to longer term.

Introduction (continued)

The key messages in this report (continued)

I would like to draw your attention to the key messages of this paper:

Conclusions from our testing

Based on our audit work completed to date we expect to issue an unmodified audit opinion.

Following updates made by management, the performance report and accountability report comply with the statutory guidance and proper practice and are consistent with the financial statements and our knowledge of the Commissioner.

Following updates made by management, the auditable parts of the remuneration and staff report have been prepared in accordance with the relevant regulation.

A summary of our work on the significant risks is provided in the dashboard on page 9.

We have not identified any misstatements above our reporting threshold.

Status of the financial statements audit

Our audit work is now complete.

Conclusions on audit dimensions

Governance statement – The disclosures are appropriate and address the minimum requirements of the Scottish Public Finance Manual (“SPFM”) and the Government Financial Reporting Manual (“FRM”).

Financial sustainability – The Commissioner achieved short term financial balance in 2020/21 and a balanced budget has been set for 2021/22. The risks of COVID-19, and all other risks should be quantified in the budget as far as possible using sensitivity analysis.

The budget setting process could be expanded to incorporate efficiencies and the Commissioner should also consider outcome-based budgeting as this is one of the directions of travel for the public sector. The level of leadership and management involvement in the budgeting process is deemed appropriate.

There is a risk that robust medium-to-long-term planning arrangements are not in place to ensure that the Commissioner can manage its finances and deliver services. We therefore recommend implementing a MTFP. Management have not been able to implement this from 2019/20 due to the impact of COVID-19 and lack of resources.

The Commissioner should develop a formalised Workforce Plan which extends to the medium term to plan for any changes in the staff mix, talent pool and succession planning. Implementing regular staff surveys would allow measurement of how the Commissioner is performing. However, we do understand the process of implementing a Workforce Plan and staff surveys in an organisation of this size with limited resource may be difficult.

Our detailed findings and conclusions are included on pages 17 to 21 of this report.

Introduction (continued)

The key messages in this report (continued)

Emerging issues

Deloitte's wider public sector team prepare a number of publications to share research, informed perspective and best practice across different sectors. We have provided a summary of those most relevant to the Commissioner as an Appendix on page 23 of this report.

Next steps

An agreed Action Plan is included in the Appendix on page 25 of this report. We will consider progress with the agreed actions as part of our 2021/22 audit.

Added value

Our aim is to add value to the Commissioner by providing insight into, and offering foresight on, financial sustainability, risk and performance by identifying areas for improvement and recommending and encouraging good practice. In so doing, we aim to help the Commissioner promote improved standards of governance, better management and decision making, and more effective use of resources.

This is provided throughout the report. In addition we have provided technical support on a number of areas throughout the year, such as around the new going concern standard and remuneration report disclosures.

Financial statements audit



Quality indicators

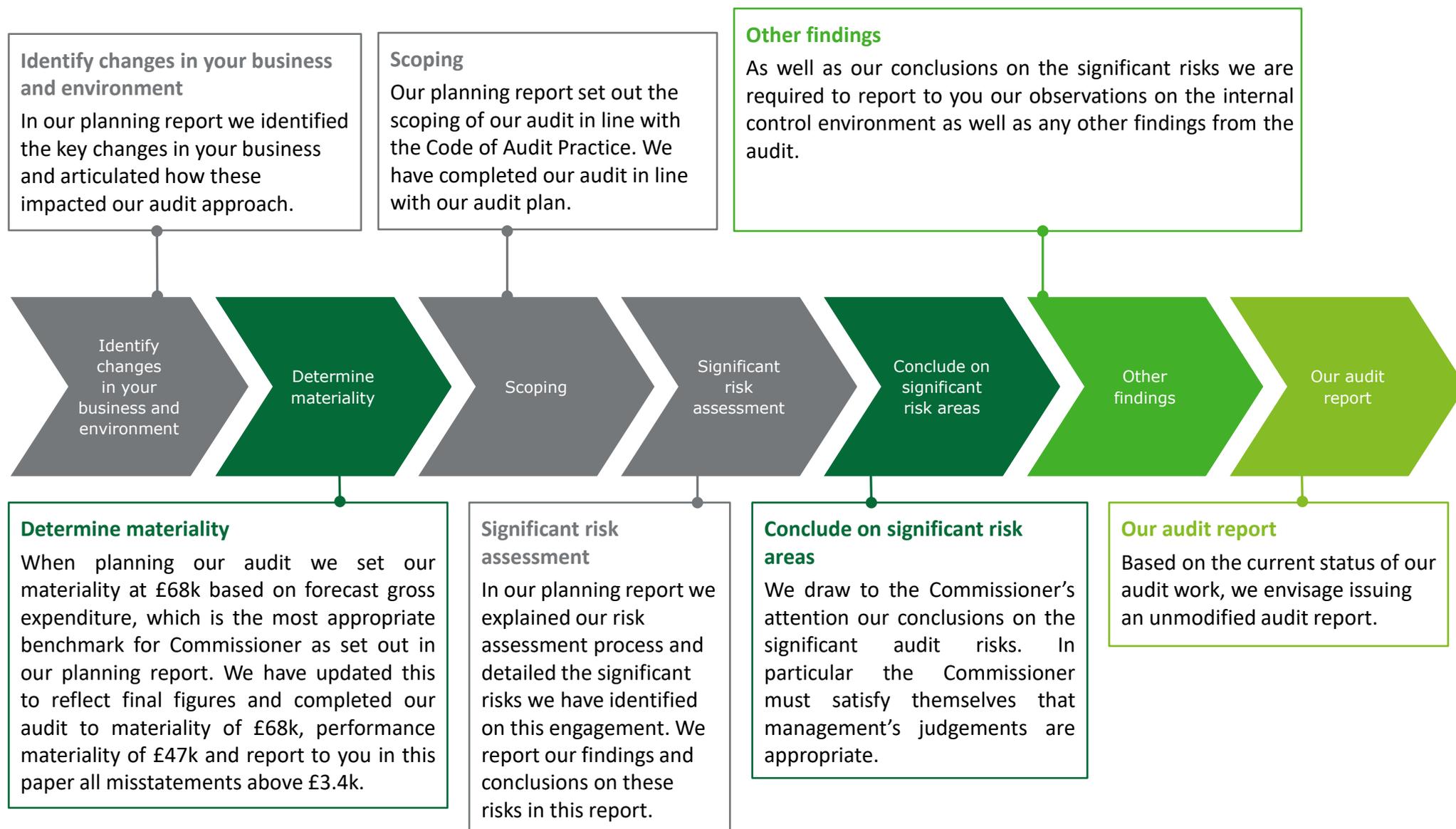
Impact on the execution of our audit

Management and those charged with governance are in a position to influence the effectiveness of our audit, through timely formulation of judgements, provision of accurate information, and responsiveness to issues identified in the course of the audit. This slide summarises some key metrics related to your control environment which can significantly impact the execution of the audit. We consider these metrics important in assessing the reliability of your financial reporting and provide context for other messages in this report.

Area	Grading	Reason
Timing of key accounting judgements		All information and supporting documentation for judgements made was available on request.
Adherence to deliverables timetable		All information was provided promptly in line with the timetable set out.
Access to finance team and other key personnel		Deloitte and the Commissioner have worked together to facilitate remote communication during the audit which has been successful.
Quality and accuracy of management accounting papers		We did not identify any issues with the quality or accuracy of management accounting papers which were reviewed by the audit team.
Quality of draft financial statements		A full draft of the annual report and accounts was received for audit on the 2 July 2021. Whilst generally compliant with the reporting requirements, some minor changes were required. These are discussed further on page 14.
Response to control deficiencies identified		We have not identified any significant control deficiencies.
Volume and magnitude of identified errors		We have not identified any significant financial or disclosure adjustments in the Annual Report and Accounts.

Our audit explained

We tailor our audit to your business and your strategy



Significant risks Dashboard

Risk	Material	Fraud risk	Planned approach to controls testing	Controls testing conclusion	Consistency of judgements with Deloitte's expectations	Comments	Page no.
Operating within the expenditure resource limits			D+I	Satisfactory		Satisfactory	10
Management override of controls			D+I	Satisfactory		Satisfactory	11

Overly prudent, likely to lead to future credit



Overly optimistic, likely to lead to future debit.

D+I: Testing of the design and implementation of key controls

Significant risks (continued)

Operating within the expenditure resource limits



Risk identified and key judgements

Under Auditing Standards there is a rebuttable presumption that the fraud risk from revenue recognition is a significant risk. In line with previous years, we do not consider this to be a significant risk for the Commissioner as there is little incentive to manipulate revenue recognition with the majority of revenue being from the Scottish Parliamentary Corporate Body ('SPCB') which can be agreed to confirmations supplied.

We therefore considered the fraud risk to be focused on how management operate within the expenditure resource limits set by the SPCB. There is a risk is that the Commissioner could materially misstate expenditure in relation to year end transactions, in an attempt to align with its tolerance target or achieve a breakeven position.

The significant risk is therefore pinpointed to the completeness of accruals and the existence of prepayments made by management at the year end and invoices processed around the year end as this is the area where there is scope to manipulate the final results. Given the financial pressures across the whole of the public sector, there is an inherent fraud risk associated with the recording of accruals and prepayments around year end.

Deloitte view

We have concluded that expenditure and receipts were incurred or applied in accordance with the applicable enactments and guidance issued by the Scottish Ministers.

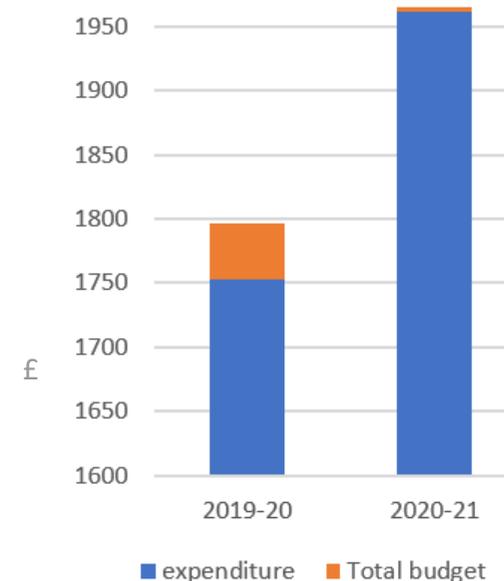
Based on our testing to date, we confirm that the Commissioner has performed within the limits set by SPCB and has achieved an overall underspend in the year. This was following additional contingency funding received in the year.



Deloitte response and challenge

We have evaluated the results of our audit testing in the context of the achievement of the limits set by the SPCB (which are illustrated in the graph below). Our work in this area included the following:

- Test the design and implementation of controls over journal entry processing
- 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;
- Select journal entries and other adjustments made at the end of a reporting period; and
- Consider the need to test journal entries and other adjustments throughout the period.



Significant risks (continued)

Management override of controls



Risk identified

Management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.

Although management is responsible for safeguarding the assets of the entity, we planned our audit so that we had a reasonable expectation of detecting material misstatements to the annual report and accounts and accounting records.



Deloitte response and challenge

In considering the risk of management override, we have performed the following audit procedures that directly address this risk:

Journals

We have tested the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the annual report and accounts. In designing and performing audit procedures for such tests, we have:

- Tested the design and implementation of controls over journal entry processing;
- Made inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments;
- Selected journal entries and other adjustments made at the end of a reporting period; and
- Considered the need to test journal entries and other adjustments throughout the period.

Accounting estimates and judgements

We have reviewed accounting estimates for biases and evaluated whether the circumstances producing the bias, if any, represent a risk of material misstatement due to fraud. In performing this review, we have:

- Evaluated whether the judgments and decisions made by management in making the accounting estimates included in the annual report and accounts, even if they are individually reasonable, indicate a possible bias on the part of the entity's management that may represent a risk of material misstatement due to fraud. From our testing we did not identify any indications of bias. Estimates include prepayments and accruals.
- Performed a retrospective review of management judgements and estimates related to significant accounting estimates reflected in the annual report and accounts of the prior year.

Significant and unusual transactions

We did not identify any significant transactions outside the normal course of business or any transactions where the business rationale was not clear.

Deloitte view

We have not identified any significant bias in the key judgements and estimates made by management.

We have not identified any instances of management override of controls in relation to the specific transactions tested.

Other significant findings

Financial reporting findings

Below are the findings from our audit surrounding your financial reporting process.

Qualitative aspects of your accounting practices:

Following updates made by management, the Commissioner's Annual Report and Accounts have been prepared in accordance with the Government Financial Reporting Manual (FRoM).

Other matters relevant to financial reporting:

We have not identified other matters arising from the audit that, in the auditor's professional judgement, are significant to the oversight of the financial reporting process.

Significant matters discussed with management:

Significant matters discussed with management related primarily to the impact of COVID-19 on the organisation. We have also discussed the Remuneration Report approach, legal confirmation and management's assessment of going concern.

We will obtain written representations from the Commissioner on matters material to the financial statements when other sufficient appropriate audit evidence cannot reasonably be expected to exist. A copy of the draft representations letter has been circulated separately.

Our audit report

Other matters relating to the form and content of our report

Here we discuss how the results of the audit impact on other significant sections of our audit report.



Our opinion on the financial statements

Our opinion on the financial statements is unmodified.



Material uncertainty related to going concern

We have not identified a material uncertainty related to going concern and will report by exception regarding the appropriateness of the use of the going concern basis of accounting.

Practice Note 10 provides guidance on applying ISA (UK) 570 Going Concern to the audit of public sector bodies. The anticipated continued provision of the service is more relevant to the assessment than the continued existence of a particular body.



Emphasis of matter and other matter paragraphs

There are no matters we judge to be of fundamental importance in the financial statements that we consider it necessary to draw attention to in an emphasis of matter paragraph.

There are no matters relevant to users' understanding of the audit that we consider necessary to communicate in an other matter paragraph.



Other reporting responsibilities

The Annual Report is reviewed in its entirety for material consistency with the financial statements and the audit work performance and to ensure that they are fair, balanced and reasonable.

Opinion on regularity

In our opinion in all material respects the expenditure and income in the financial statements were incurred or applied in accordance with any applicable enactments and guidance issued by the Scottish Ministers.

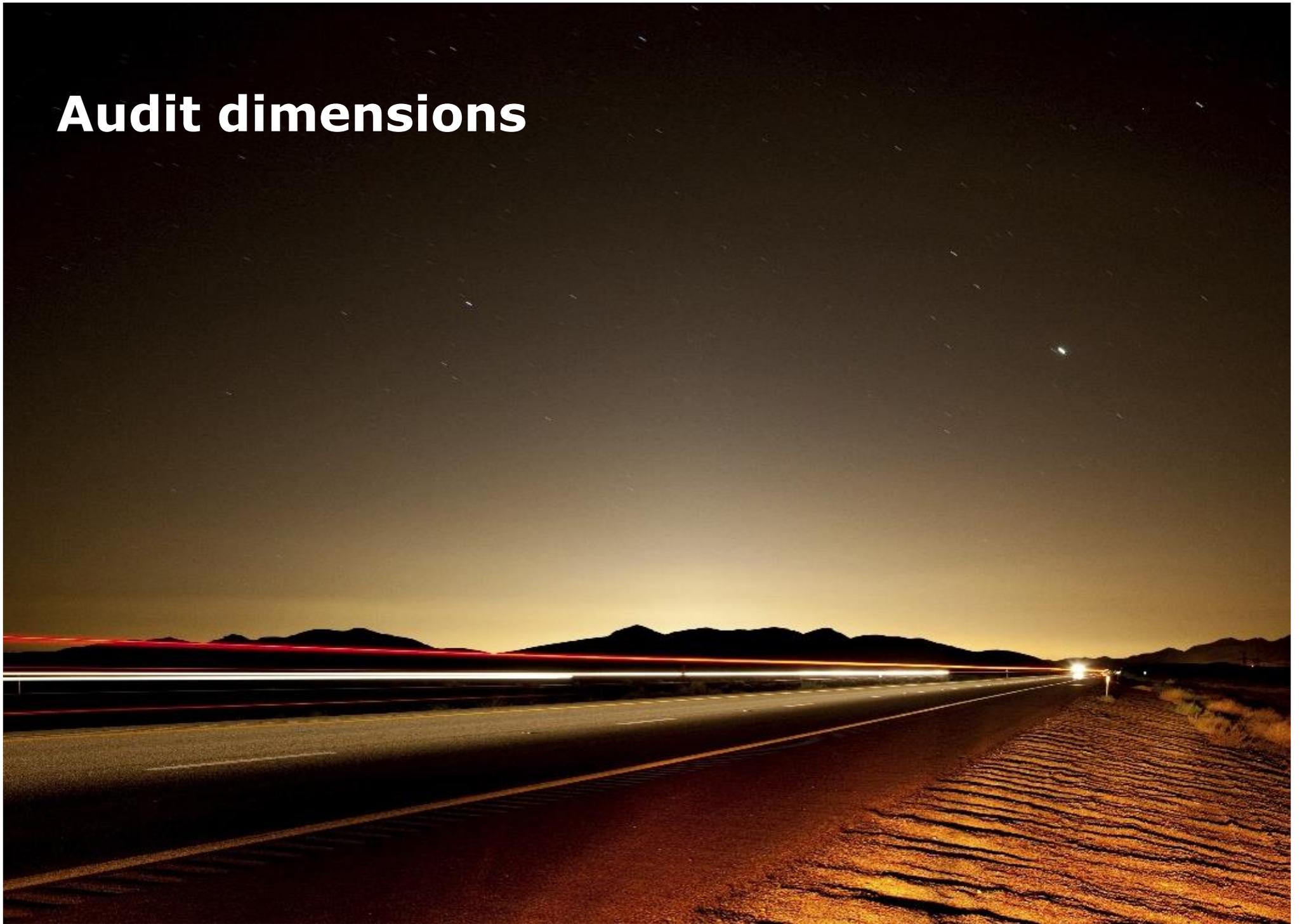
Our opinion on matters prescribed by the Auditor General for Scotland are discussed further on page 14.

Your annual report

We are required to provide an opinion on the auditable parts of the remuneration and staff report, the annual governance statement and whether the performance report are consistent with the disclosures in the accounts.

	Requirement	Deloitte response
The Performance Report	The report outlines the Commissioner's performance, both financial and non-financial. It also sets out the key risks and uncertainty as set out in the Annual Operating Plan.	<p>We have assessed whether the performance report has been prepared in accordance with the accounts direction. No exceptions noted.</p> <p>We have also read the performance report and confirmed that the information contained within is materially correct and consistent with our knowledge acquired during the course of performing the audit, and is not otherwise misleading. We provided management with comments and suggested changes and have received an updated version reflecting these changes.</p>
The Accountability Report	Management have ensured that the accountability report meets the requirements of the FReM, comprising the governance statement, remuneration and staff report and the parliamentary accountability report.	<p>We have assessed whether the information given in the governance statement is consistent with the financial statements and has been prepared in accordance with the accounts direction. No exceptions noted.</p> <p>We have also read the accountability report and confirmed that the information contained within is materially correct and consistent with our knowledge acquired during the course of performing the audit, and is not otherwise misleading. We provided management with comments and suggested changes and have received an updated version reflecting these changes.</p> <p>We have also audited the auditable parts of the remuneration and staff report and confirmed that it has been prepared in accordance with the accounts direction.</p>
Going Concern	Management has made appropriate disclosure relating to Going Concern matters.	The 2021/22 budget was approved by the SPCB with expenditure totalling £2,030k. We have concluded that the plan is sufficiently robust to demonstrate that Commissioner will be a going concern for 12 months from signing the accounts. We have also assessed the going concern disclosure in the financial statements and have concluded that it is appropriate and consistent with our knowledge acquired during the course of performing the audit, and is not otherwise misleading.

Audit dimensions



Audit dimensions

Overview

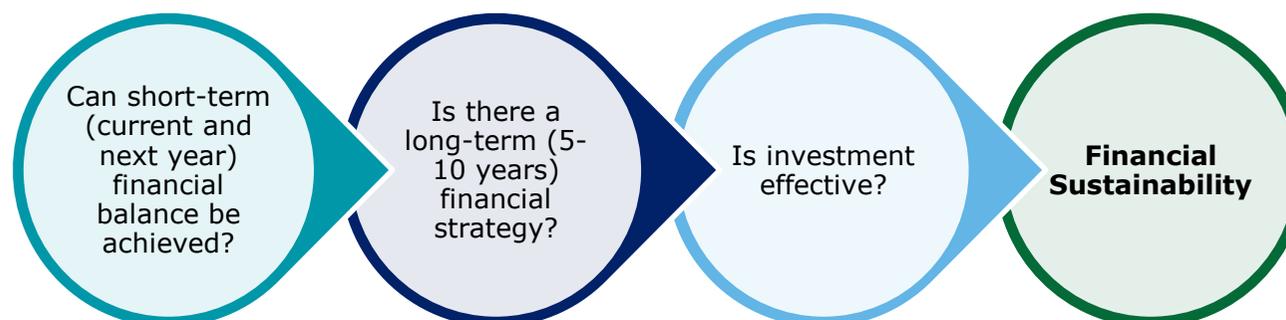
As set out in our Audit Plan, Public audit in Scotland is wider in scope than financial audit. This section of our report sets out our findings and conclusion on our audit work covering the following areas. In line with previous years, we have concluded that the full application of the wider scope is not appropriate and have applied the “small body” clause set out in the Code which allows narrower scope work to be carried out. We have updated our risk assessment during the audit and confirm that the judgement made in our audit plan has not changed. Our work in this area was restricted to concluding on:

- The appropriateness of the disclosures in the **governance statement** (which is discussed on page 14); and
- The **financial sustainability** of the Commissioner and the services that it delivers over the medium to longer term.

In addition to the above, we have reviewed the Commissioner’s arrangements for the **prevention and detection of fraud and irregularities**. Overall we found the Commissioner arrangements to be operating effectively.

Financial sustainability

Financial sustainability looks forward to the medium and longer term to consider whether the body is planning effectively to continue to deliver its services or the way in which they should be delivered.



Financial sustainability

Areas considered

Our approach to the audit dimensions is risk focused. Within our audit plan we identified the following risk:

The financial impact of the COVID-19 pandemic includes unexpected capital expenditure investment to enable staff to work remotely. Additional work was also undertaken responding to changes in FOI legislation during the COVID-19 pandemic.

There is a risk that robust long-term planning arrangements are not in place to ensure that the body can manage its finances sustainably and deliver services effectively, identify issues and challenged early and act on them promptly.

Budget setting

2019/20 Conclusions

The Commissioner has performed within the limits set by SPCB for 2019/20 and therefore has achieved short-term financial balance. The Commissioner has set a balanced budget for 2020/21.

2020/21 Update

The Commissioner performed within the limits set by the SPCB and therefore achieved short term financial balance in 2020/21. A balanced budget has been set for 2021/22 and robust financial reporting procedures are in place.

The actual funds drawn down amounted to £1,961k which constitutes an underspend of £4k on the total possible funding of £1,965k. We are therefore satisfied that the Commissioner has achieved short term financial balance in 2020/21.

The Commissioner submitted their draft budget for 2021/22 to the SPCB on 23 September 2020 and was approved by the SPCB on 25 March 2021.

The expenditure for the year has been budgeted to be £2,030k, compared to a 2020/21 budget of £1,903k. This represents an increase of £127k or c.6.7%. The budget assumes that short term financial balance can be achieved.

The increase from the prior year has been primarily driven by an increase in staff costs, reflecting 2% cost of living allowance as directed by SPCB guidance as well as extra funding approved by the Scottish Government as a result of the extension of the FOISA to include Registered Social Landlords.

As the increase in expected costs in the next year is matched by an increase in funding provided, we anticipate that Commissioner will continue to achieve financial balance moving forward.

We have assessed the assumptions used in the 2021/22 budget and on the whole consider them to be reasonable. For example, the budget assumes a 2% increase in all costs, which is broadly in line with the current Scottish Government guidance of 3% for staff costs.

The budget was tabled and approved at the leadership team meeting in September 2021. This was attended by the Commissioner, Head of Corporate Services, Head of Enforcement, Head of Policy and Information, and Finance and Administration Manager.

There are no efficiency targets built into the budget, nor into the 2020-24 strategic plan. The Commissioner should consider if there are any possible cost or other efficiencies which could be harnessed. Additionally, there is a lack of outcome-based budgeting.

Through the review of the budget, Brexit has not been explicitly considered as it is not considered a strategic risk to the organisation. Management should continue to monitor developments during 2021/22 by considering any relevant training and by keeping in contact with SPCB, SG and other bodies. This will ensure that the Commissioner is doing everything possible to mitigate the risk and identify new risks if they arise.

Financial sustainability (continued)

Budget setting (continued)

The impact of COVID-19 has been considered in the funding for 2021/22 and 2020/21. However, there has not been any quantification of the potential impacts due to the level of ongoing uncertainty. The Commissioner has noted that they have informed SPCB as and when unbudgeted expenditure has arisen, and will continue to do so. Should any further expenditure due to COVID-19 which is over and above the funding already provided be needed, the Commissioner will apply to the Officeholder's Contingency Fund for additional resources. Although there has been extensive work put into the strategic and operational risk registers, there is no monetary quantification of these risks due to the level of ongoing uncertainty.

2020/21 conclusion

The Commissioner achieved short term financial balance in 2020/21. A balanced budget has been set for 2021/22. However, the impact of COVID-19 remains a significant risk which could impact on the Commissioner achieving short-term financial balance depending on the wider economic impact of the pandemic.

The 2021/22 budget setting process has captured the key drivers of movement since 2020/21 although it could be expanded to incorporate efficiencies. The Commissioner should also consider outcome-based budgeting as this is not currently done but will allow them to demonstrate the impact of their resources. The level of leadership and management involvement in the budgeting process is deemed appropriate.

Medium-to long-term financial planning

2019/20 Conclusions

The Commissioner has a strategic plan in place which includes expected financial resources until 2024. However this does not include discussion of any assumptions made or sensitivity analysis.

The Commissioner does not have any medium or long-term financial plan in place which is as a result of not being able to obtain multi year funding.

2020/21 Update

As the Commissioner only receives funding confirmation from the SPCB for one year, and also due to limited staff resource, they have not prepared a medium- or long-term financial strategy.

While there is some financial information in the 2020-24 strategic plan, there remains a risk that robust medium-to-long-term planning arrangements are not in place. This is especially important given the ongoing effects of the COVID-19 pandemic. The lack of medium term financial planning has not been noted as a risk by the Commissioner.

2020/21 conclusion

There is a risk that robust medium-to-long-term planning arrangements are not in place to ensure that the Commissioner can manage their finances sustainably and deliver services effectively, which could potentially reduce the Commissioner's ability to identify issues early and response to these promptly.

This is an outstanding recommendation since the 2019/20 audit. Due to the economic and societal uncertainty in the UK as the COVID-19 pandemic response continues, management have been unable to progress this recommendation alongside the lack of resources available.

While the Commissioner cannot expect to know what funding they will receive in the medium to long term, they could use historic information to predict likely scenarios and use these as a basis to perform medium to long term financial planning. Our view is that although the Commissioner receives annual funding it is possible to prepare a MTFP, recognising that this needs to be proportionate to the size of the organisation.

Financial sustainability (continued)

Workforce Planning

2019/20 Conclusions

Not specifically reported within our 2019/20 report.

2020/21 Update

The Commissioner currently does not have a formalised workforce plan. Given that staff costs account for 78% of total expenditure it is critical that the Commissioner can plan for any changes in the staff mix, talent pool and perform succession planning.

There is a Human Resources Strategy in place which they monitor mainly through the risk register. This provides for:

- Monitoring and planning resourced actively in a structured and forward looking way, embedding a risk-based approach to forward planning and contingency management
- Takes into account projections of business volumes, budgets, contingencies and the need for business continuity.

The resources section of the strategy currently focuses primarily on a short-term view and does not define any future workforce in the medium to longer term. Succession planning is completed separately as part of business continuity arrangements however not consistently across the organisation.

The main metrics reported are headcount (including any changes) and the ratio of sex. There has been no formal feedback from staff to management in an anonymous and safe way for them to suggest improvements and report their opinions during 2020/21. However managers have received training to support them having conversations about wellbeing and discuss and improvements the Commissioner could make.

2020/21 conclusion

The Commissioner should develop a Workforce Plan, aligned to a Medium Term Financial Plan, which extends to the medium term to plan for any changes in the staff mix, talent pool and succession planning. This is important given the high proportion of staff costs to total costs and the overall importance of staff in performing the duties of the body.

While it is clear through review of the leadership meeting minutes where sickness and COVID-19 are discussed, that thought has been put into the wellbeing of staff, implementing regular staff surveys would allow measurement of metrics, such as overall satisfaction with policies, as well as allowing staff to suggest what would help them. However, we do understand the process of implementing in an organisation of this size may be difficult due to the limited resources available.

Financial sustainability (continued)

Deloitte view – Financial sustainability

The Commissioner achieved short term financial balance in 2020/21 and a balanced budget has been set for 2021/22. The risks of COVID-19, and all other risks should be quantified in the budget as far as possible using sensitivity analysis.

The budget setting process could be expanded to incorporate efficiencies and the Commissioner should also consider outcome-based budgeting as this is one of the directions of travel for the public sector. The level of leadership and management involvement in the budgeting process is deemed appropriate.

There is a risk that robust medium-to-long-term planning arrangements are not in place to ensure that the Commissioner can manage its finances and deliver services, we recommend implementing a MTFP. Management have not been able to implement this from 2019/20 due to the impact of Covid-19 and lack of resources.

The Commissioner should develop a formalised Workforce Plan which extends to the medium term to plan for any changes in the staff mix, talent pool and succession planning. Implementing regular staff surveys would allow measurement of how the Commissioner is performing. However, we do understand the process of implementing in an organisation of this size may be difficult. We also recognise that there is currently limited resources available to do this.

Purpose of our report and responsibility statement

Our report is designed to help you meet your governance duties

What we report

Our report is designed to help the Commissioner discharge their governance duties. It also represents one way in which we fulfil our obligations under ISA (UK) 260 to communicate with you regarding your oversight of the financial reporting process and your governance requirements. Our report includes:

- Results of our work on key audit judgements and our observations on the quality of your Annual Report;
- Our internal control observations; and
- Other insights we have identified from our audit.

The scope of our work

Our observations are developed in the context of our audit of the financial statements.

We described the scope of our work in our audit plan.

Use of this report

This report has been prepared for the Commissioner, as a body, and we therefore accept responsibility to you alone for its contents. We accept no duty, responsibility or liability to any other parties, since this report has not been prepared, and is not intended, for any other purpose.

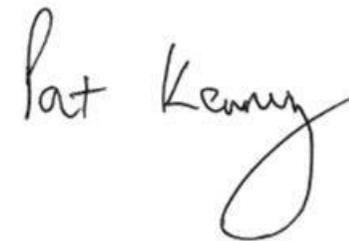
What we don't report

As you will be aware, our audit was not designed to identify all matters that may be relevant to the Commissioner .

Also, there will be further information you need to discharge your governance responsibilities, such as matters reported on by management or by other specialist advisers.

Finally, our views on internal controls and business risk assessment should not be taken as comprehensive or as an opinion on effectiveness since they have been based solely on the audit procedures performed in the procedures performed in fulfilling our audit plan.

We welcome the opportunity to discuss our report with you and receive your feedback.



Pat Kenny, CPFA

For and on behalf of Deloitte LLP

Glasgow | 13 September 2021

Sector developments



Scottish Futures Trust - New Frontiers for Smarter Working, Work and Workplace post COVID-19

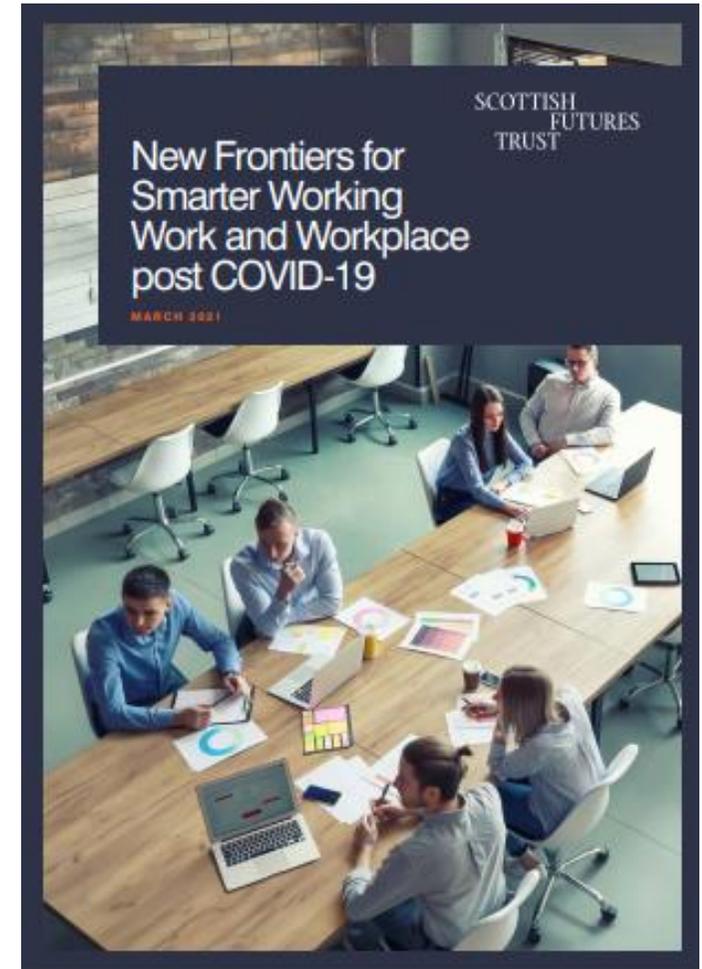
Background and overview

COVID-19 has fast-tracked a social revolution where a wider range of working choices could be on the horizon for hundreds of thousands of workers.

A new report by infrastructure experts, the Scottish Futures Trust (SFT) reveals that the workforce of the future - predominantly those who have been office based - will want to make informed choices of where and how to work most productively and more beneficially for their wellbeing.

Post the pandemic, organisations should consider the three 'Hs' of working - from Home, a nearby hub or local location, where employees can meet clients or have time to concentrate on projects, or the HQ and head office, where people can gather to socialise, brainstorm ideas or collaborate face-to-face.

The "New Frontiers for Smarter Working, Work and Workplace Report also finds that this new blended future will depend on how employers gauge the benefits from the improved working set up while ensuring the wellbeing of employees.



Next steps

The report reveals a new future for best work, productivity and wellbeing. The full report is available at [Scottish Futures Trust](https://www.scottishfuturestrust.com/).

Appendices



Action plan

Recommendations for improvement

No.	Area	Recommendation	Management Response	Responsible person	Target Date	Priority
1	<i>Financial planning</i>	The Commissioner should develop a Medium Term Financial Plan, to ensure that the Commissioner can manage its finances sustainably and deliver services effectively over the medium to long term.	It has not been possible to put a MTFP due to the impact of the COVID-19 pandemic and, limited resource. Subject to these matters, a MTFP will be considered this for future financial years.	Head of Corporate Services	2023-24	Medium
2	<i>Workforce planning</i>	The Commissioner should develop a workforce plan to ensure that the Commissioner can identify necessary resources to enable them to deliver their functions over the medium to long term.	<p>The Human Resources Strategy provides for workforce planning although we do not have a stand alone document entitled "Workforce Plan"</p> <p>There is also an effective management reporting system to enable the SMT to monitor and review key workforce statistics.</p> <p>Subject to sufficient resource, a "Workforce Plan" will be considered and developed in accordance with the Human Resources Strategy.</p>	Head of Corporate Services	2023-24	Medium

Our other responsibilities explained

Fraud responsibilities and representations



Responsibilities:

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



Required representations:

We have asked the Commissioner to confirm in writing that you have disclosed to us the results of your own assessment of the risk that the financial statements may be materially misstated as a result of fraud and that you have disclosed to us all information in relation to fraud or suspected fraud that you are aware of and that affects the entity.

We have also asked the Commissioner to confirm in writing their responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud and error.



Audit work performed:

In our planning we identified the risk of fraud in relation to operating within the expenditure resource limit and management override of controls as a key audit risk for your organisation.

During course of our audit, we have had discussions with management and those charged with governance.

In addition, we have reviewed management's own documented procedures regarding fraud and error in the financial statements.

Independence and fees

As part of our obligations under International Standards on Auditing (UK), we are required to report to you on the matters listed below:

Independence confirmation

We confirm the audit engagement team, and others in the firm as appropriate, Deloitte LLP and, where applicable, all Deloitte network firms are independent of the Commissioner and our objectivity is not compromised.

Fees

The audit fee for 2020/21, in line with the expected fee range provided by Audit Scotland, is £16,910, as analysed below:

	£
Auditor remuneration	13,200
Audit Scotland fixed charges:	
Pooled costs	3,040
Audit support costs	670
Total fee	16,910

We have still to assess any impact the additional testing as a result of COVID-19. Once completed, we will discuss any impact on the fee with management.

No non-audit services fees have been charged for the period.

Non-audit services

In our opinion there are no inconsistencies between the FRC's Ethical Standard and the company's policy for the supply of non-audit services or any apparent breach of that policy. We continue to review our independence and ensure that appropriate safeguards are in place including, but not limited to, the rotation of senior partners and professional staff and the involvement of additional partners and professional staff to carry out reviews of the work performed and to otherwise advise as necessary.

Relationships

We are required to provide written details of all relationships (including the provision of non-audit services) between us and the organisation, and senior management and its affiliates, including all services provided by us and the DTTL network to the audited entity, and senior management and its affiliates, and other services provided to other known connected parties that we consider may reasonably be thought to bear on our objectivity and independence.

We are not aware of any relationships which are required to be disclosed.



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