



Consumer Scotland

**Final report to the Audit and Risk Committee, the Board and the Auditor General for
Scotland for the year ended 31 March 2023 audit**

Issued on 29 September for the meeting on 3 October 2023

Contents

01 Final report

Partner Introduction [3](#)

Annual Report and Accounts

Quality indicators [7](#)

Our audit explained [8](#)

Significant risks [9](#)

Your control environment and findings [12](#)

Other significant findings [13](#)

Our audit report [14](#)

Your Annual Report and Accounts [15](#)

Wider scope audit

Overview [17](#)

Financial management [18](#)

Financial sustainability [21](#)

Vision, leadership and governance [24](#)

Use of resources to improve outcomes [28](#)

Best value [30](#)

Climate change [31](#)

Purpose of our report and responsibility statement [34](#)

02 Appendices

Action plan [36](#)

Audit adjustments [40](#)

Our other responsibilities explained [41](#)

Independence and fees [42](#)

1.1 Partner 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 Annual Report and Accounts.
- 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 Audit and Risk Committee (“the Committee”, “ARC”) of Consumer Scotland for the year ended 31 March 2023 audit. The report summarises our findings and conclusions in relation to the audit of the Annual Report and Accounts and the wider scope requirements, the scope of which was set out within our planning report presented to the Committee in March 2023.

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 report.

The Performance Report and Accountability Report comply with the statutory guidance and proper practice and are consistent with the Annual Report and Accounts and our knowledge of Consumer Scotland. We provided management with comments and suggested changes based on review of the first draft and an update has been received confirming compliance.

The auditable parts of the Remuneration and Staff Report have been prepared in accordance with the relevant regulation. Some changes were required in order to comply with reporting requirements, for example the Fair Pay disclosures, however these have been corrected by management in the revised Annual Report and Accounts.

A summary of our work on the significant risks is provided in the dashboard on page [9](#). Consumer Scotland met its financial targets for 2022/23, with the final Grant in Aid allocation £1.049m below budget.

No material errors have been identified to date and there are no uncorrected misstatements. Two corrected misstatements in excess of our reporting threshold of £2,900 has been identified up to the date of this report which is included within the Appendix to this report. These have no impact on Consumer Scotland’s final financial surplus position.

1.2 Partner introduction (continued)

The key messages in this report (continued)

Status of the Annual Report and Accounts audit

Our audit is complete.

Conclusions from wider scope audit work

Financial management – Sound financial management arrangements have been established during the first year of operations. While a significant underspend was reported in the year, this was largely as a result in delays in recruitment as the organisation becomes established and has been closely monitored throughout the year.

Financial sustainability – Financial balance has been achieved in 2022/23 and a balanced budget approved for 2023/24, therefore Consumer Scotland is financially sustainable in the short term. While early work has started in developing a medium term outlook, further work is required to fully develop this to be able to demonstrate that Consumer Scotland is financially sustainable over the medium to longer term. We have recommended that, as Consumer Scotland develops its five year plan, reference is made to Audit Scotland's publication which sets out the important features of a financial strategy.

Vision, leadership and governance – The approved Strategic Plan sets out a clear vision for Consumer Scotland. During its first year of operation, an experienced leadership team have been put in place, both at the Executive and non-Executive level.

Effective governance and scrutiny arrangements are in place, underpinned by clear governance documents and demonstrated through high attendance and effective scrutiny and challenge at Board and ARC meetings.

Consumer Scotland is also open and transparent. This could be further enhanced by publishing Board papers on-line alongside the minutes currently published.

Use of resources to improve outcomes – A performance management framework is being developed. Plans are in place to consider the impact and outcomes of the work that the organisation does, which is in line with best practice. We will continue to monitor how this is developed and implemented during the course of our audit appointment.

Best Value – Consumer Scotland has sufficient arrangements in place to secure best value. It has a clear understanding of areas which require further development. Financial sustainability and the development of a clear performance management framework remain key risks.

1.3 Partner introduction (continued)

The key messages in this report (continued)

Conclusions from wider scope audit work (continued)

Climate change – Recognising the nature Consumer Scotland as a public sector body with one office site and the wider role that Consumer Scotland has on climate change adaption and mitigation, it is clear that Consumer Scotland is committed to take action to meet the Scottish Government’s ambitious targets in relation to sustainability and climate. A clear Strategy or Action Plan needs to be developed to set out how the organisation plans to contribute to the targets to allow regular reporting against baseline data.

Cyber risk – Cyber security is high priority for Consumer Scotland and is closely monitored as part of the Strategic Risk Register. Plans are in place to carry out an Internal Audit review of cyber security risks in 2023/24.

Next steps

An agreed Action Plan is included on pages [36 to 39](#) of this report.

Added value

Our aim is to add value to Consumer Scotland 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 Consumer Scotland promote improved standards of governance, better management and decision making, and more effective use of resources. This is provided throughout the report.

Pat Kenny
Associate partner

Annual Report and Accounts Audit









2.1 Quality indicators

Impact on the execution of our audit

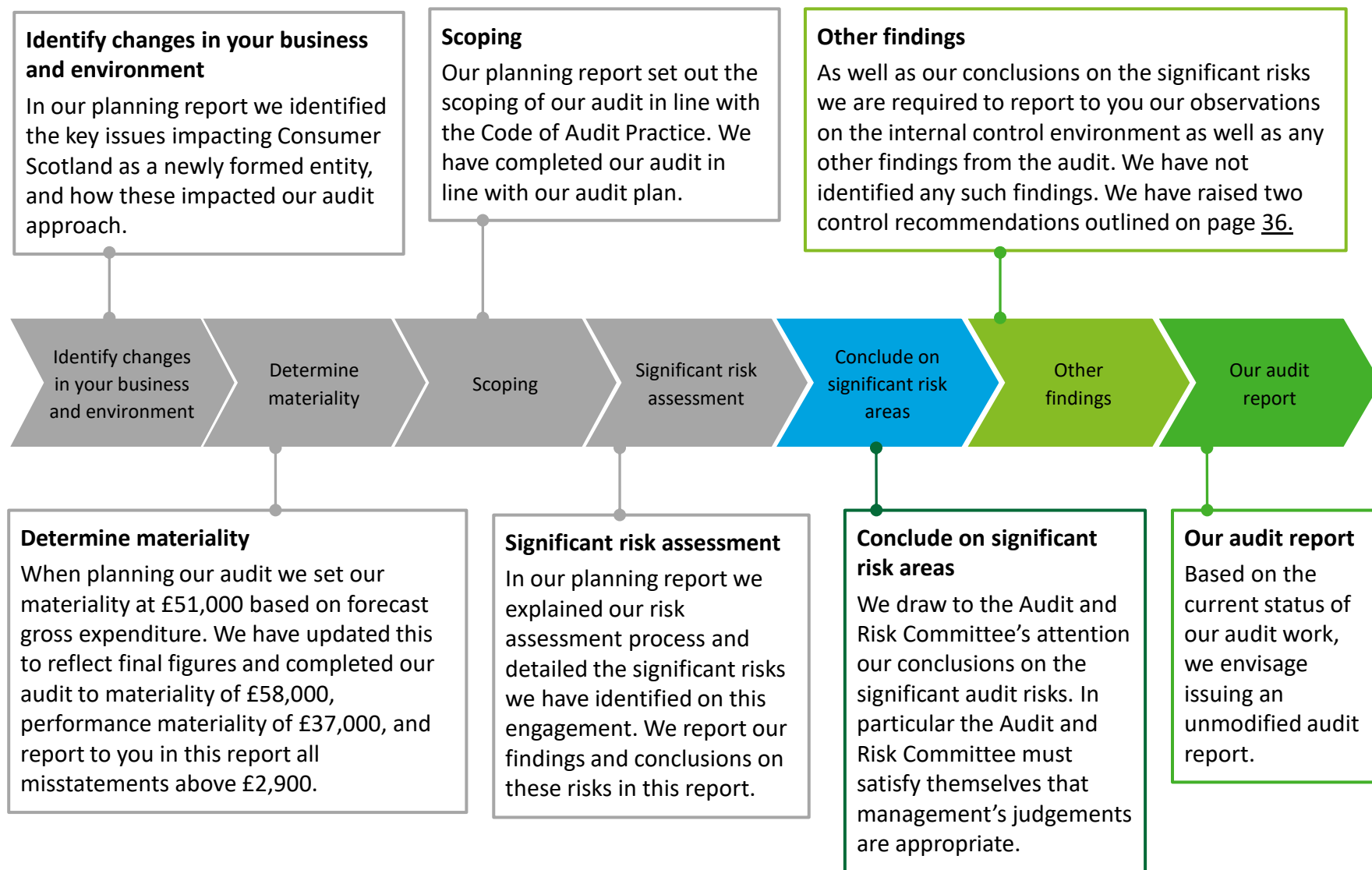
Management and those charged with governance are in a position to influence the effectiveness of our audit, through timely formulation of judgements, provision of accurate information, and responsiveness to issues identified in the course of the audit. This slide summarises some key metrics related to 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.

 Lagging
  Developing
  Mature

Area	Grading	Reason	Further detail
Timing of key accounting judgements/estimates	N/A	Not applicable as the Annual Report and Accounts do not contain any key accounting judgements or estimates.	N/A
Adherence to deliverables timetable		All deliverables were provided within agreed upon timeframes. All follow up requests and queries were dealt appropriately.	N/A
Access to finance team and other key personnel		All key members of staff were available throughout the audit. No issues were encountered.	N/A
Quality and accuracy of management accounting papers		Evidence provided by management was generally found to be complete, accurate and sufficient for the purposes of our audit.	N/A
Quality of draft Annual Report and Accounts		The completed draft of the Annual Report and Accounts were provided for audit on a timely basis. There were some changes required in order to ensure compliance with the financial reporting framework.	15
Response to control deficiencies identified		We noted two findings in relation to review of year-end accruals and holiday pay accruals. We are satisfied with responses from Management.	12
Volume and magnitude of identified errors		We have identified two misstatements relating to classifications of payables and accruals which have been corrected and not material. There are no material errors identified as part of the audit.	40







2.2 Our audit explained

We tailor our audit to your business and your strategy






2.3.1 Significant risks

Significant risk dashboard

Risk*	Fraud risk	Planned approach to controls	Controls conclusion	Consistency of judgements with Deloitte's expectations
Management override of controls			Satisfactory	
Operating within the expenditure resource limit			Satisfactory	

Controls approach adopted
 Assess design & implementation

Controls conclusion
 Satisfactory
 Not Satisfactory

Consistency of judgements with Deloitte's expectations
 Consistent
 Improvement required
 Inconsistent

*Risk was revised from Audit Plan due to further information obtained from Consumer Scotland Finance team which includes removal of significant risk relating to levy income previously identified.

2.3.2 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 Annual Report and Accounts 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;
- Tested 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

There are no significant accounting estimates or judgements identified by the entity.

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 instances of management override of controls from our testing. Our testing in this area has not identified any exceptions.

2.3.3 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 our planning report, we do not consider this to be a significant risk for Consumer Scotland as there is little incentive to manipulate revenue recognition with all revenue being from the Scottish Government 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 Scottish Government. There is a risk that Consumer Scotland 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.

We also note that Consumer Scotland has separate start up costs separately accounted for which have been included now as part of its expenditure which we have also direct assessed and reviewed.



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 Scottish Government. Our work in this area included the following:

- Evaluating the design and implementation of controls around monthly monitoring of financial performance;
- Confirming the resource limits allocated to Consumer Scotland by the Scottish Government by reference to the Budget Act
- Performing focused testing of accruals and prepayments made at the year-end;
- Performing focused cut-off testing of invoices received and paid around the year-end including those relating to grant in aid expenses for other public bodies;
- Perform test of details for start-up costs included in the expenditure.

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 Consumer Scotland has performed within the limits set by Scottish Government with the final Grant in Aid allocation being £1.049m below budget for its first year of operations and therefore is in compliance with the financial targets set for the period. We have reviewed the grant-in-aid received from other public bodies and noted no issues.

2.4 Your control environment and findings

Control deficiencies and areas for management focus

Observation	Deloitte recommendation	Management response and remediation plan
<p>Review of Trade Payables and Accruals</p> <p>Through our audit testing it was noted that there were errors in the classification of trade payables and accruals as at year-end.</p> <p>These errors were caused by inappropriate reference to when the invoice has been received and should be recorded as a payable or accrual as at year end.</p>	<p>It is recommended that a more detailed review-type control be designed and implemented for these year-end accrual and trade payable classification. This includes better control on reviewing the outstanding invoices as at year-end to ascertain appropriate classification.</p>	<p>See Action Plan on page 36.</p>
<p>Review of Holiday Pay Accrual and tracking of holiday leave</p> <p>We noted that a review of the holiday tracker schedule which forms the basis of the holiday pay accrual has not been reviewed prior to calculations being made.</p> <p>Employees directly update the schedule as and when leave is taken but there is no control in ensuring the leave numbers are appropriate.</p>	<p>We recommend that the leave balance is reviewed, with evidence of review retained, in advance of the holiday pay accrual calculation being performed.</p> <p>There is a risk that the calculations are not accurate and appropriate given the supporting leave schedules are not reviewed.</p>	<p>See Action Plan on page 36.</p>

2.5 Other significant findings

Financial reporting findings

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

Qualitative aspects of your accounting practices:

Consumer Scotland's Annual Report and Accounts have been prepared in accordance with the Government Financial Reporting Manual (the "FReM"). Following our audit work, we are satisfied that the accounting policies are appropriate.

Significant matters discussed with management:

There were no significant matters discussed with management other than the applicability of IFRS 16 to the current period's Annual Report and Accounts

Regulatory change

IFRS 16, Leases, came into effect on 1 April 2022, therefore 2022/23 is the first year of implementation. Due to the short term nature of the office lease in place for the 2022-2023 period, the short-term lease exemption under IFRS 16 was applied meaning that no right-of-use asset required to be capitalised and no lease liability recognised in the annual accounts for the year ended 31 March 2023.

Going forward, assessment of new accommodation arrangements in place following the period end will need to reassessed. This will be considered as part of the 2023/24 audit.

Liaison with internal audit

The audit team, has completed an assessment of the independence and competence of the internal audit department and reviewed their work and findings. In response to the significant risks identified, no reliance was placed on the work of internal audit and we performed all work ourselves.

We will obtain written representations from Consumer Scotland on matters material to the Annual Report and Accounts when other sufficient appropriate audit evidence cannot reasonably be expected to exist. A copy of the draft representations letter has been circulated separately.

2.6 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.

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Our opinion on the Annual Report and Accounts

Our opinion on the Annual Report and Accounts is expected to be unmodified.



Going concern

We have not identified a material uncertainty related to going concern and will report that we concur with management's 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 that 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 Annual Report and Accounts 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 Annual Accounts 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 Annual Report and Accounts 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 [15](#).

2.7 Your Annual Report and Accounts

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 and the Accountability Report is consistent with the disclosures in the accounts.

	Requirement	Deloitte response
The Performance Report	The report outlines Consumer Scotland's performance, both financial and non-financial. It also sets out the key risks and uncertainties faced by Consumer Scotland.	<p>We have assessed whether the Performance Report has been prepared in accordance with the Accounts Direction. 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.</p> <p>We provided management with comments and suggested changes which management have updated in the revised draft. This included presentational suggestions.</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 Annual Governance Statement is consistent with the Annual Report and Accounts 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 which management have updated in the revised draft.</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. Changes to ensure compliance with the FReM were suggested to management, particularly in relation to Fair Pay disclosure requirements. Management have corrected these in the final draft of the Annual Report and Accounts.</p>

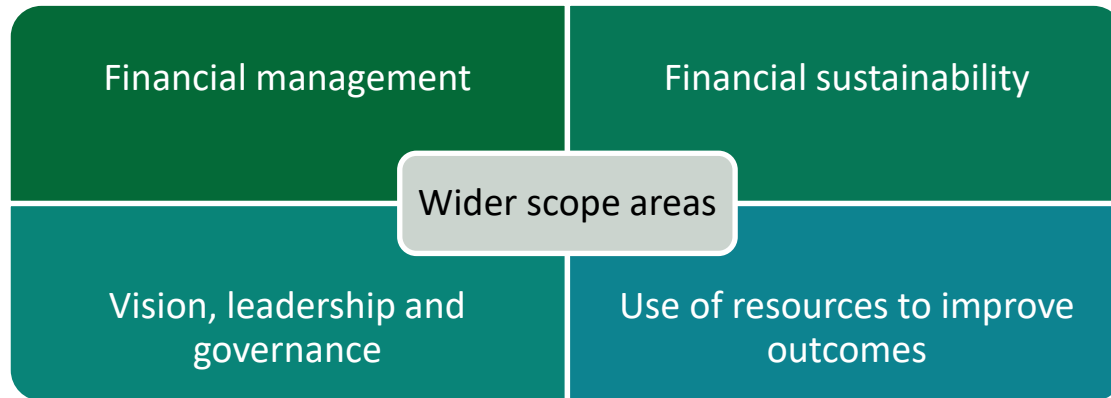
Wider scope audit



3.1 Wider scope requirements

Overview

As set out in our audit plan, Reflecting the fact that public money is involved, public audit is planned and undertaken from a wider perspective than in the private sector. The wider scope audit specified by the Code of Audit Practice broadens the audit of the accounts to include consideration of additional aspects or risks in the following areas.



In its planning guidance, Audit Scotland has also highlighted the following national or sectoral risks that the Auditor General and Accounts Commission wish auditors to consider at all bodies during the 2022/23 audits:

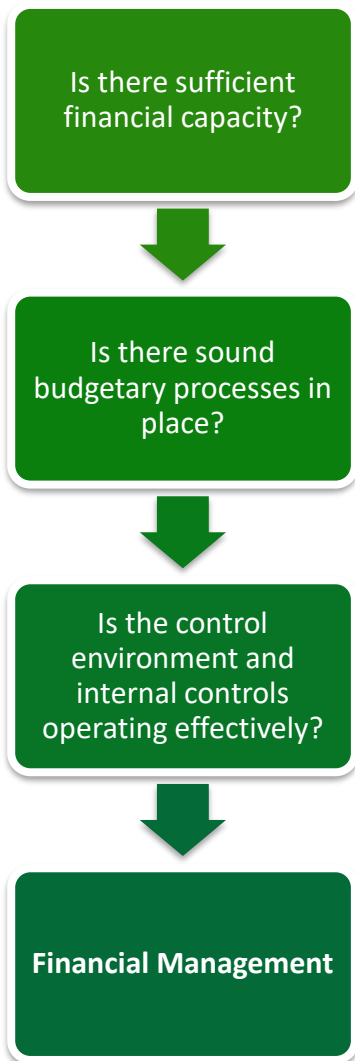
- Climate change.
- Cyber security.

Our audit work has considered how Consumer Scotland is addressing these and our conclusions are set out within this report, with the report structured in accordance with the four dimensions. Our responsibilities in relation to Best Value ('BV') have all been incorporated into this audit work.

Consumer Scotland was established in April 2022, with the financial year 2022/23 being the first Annual Report and Accounts and audit. Our work in 2022/23 has enabled us to form a view of Consumer Scotland's baseline position and management should use this to drive continuous improvement. We will use this baseline in future audits to assess performance and in particular inform our assessment in relation to Best Value.

3.2 Wider scope requirements (continued)

Financial management



Significant risks identified in Audit Plan

In our Audit Plan we highlighted that as a new organisation established in 2022, with forecast underspends due to delays with set up of the organisation and recruitment., there is a risk that adequate financial planning and management arrangements are not in place, including a sufficiently qualified and experienced finance team. We have considered the impact on the following pages.

Current year financial performance

As a Non-Ministerial Office (NMO) of the Scottish Administration, working alongside but separate from the Scottish Government and accountable directly to the Scottish Parliament, Consumer Scotland's core budget allocation appears as distinct lines items in the Annual Scottish Budget Bill. Funding is also received through grant-in-aid funding from other public bodies for specific work programmes. The Chief Executive, as Accountable Officer, has direct accountability to the Scottish Parliament in relation to the financial management of Consumer Scotland. However, given the Board has ultimate responsibility for Consumer Scotland, the Board needs to assure itself that procedures are in place to ensure the propriety and probity of public expenditure.

After receiving the allocation, Consumer Scotland has flexibility to determine how that money is spent and is split at a high level between staff costs, programme costs, delivery contract costs and corporate services. Since its inception, regular reports have been provided the ARC on to the budget position. The 2022/23 budget was presented to the Board for comment at its meeting in Mary 2022.

The format of the reporting has evolved during the year to incorporate more detail, at the request of the ARC. Most recently, the Chair of the ARC has requested further information on grant-in-aid funding from other public bodies activities to be included, to link to outcomes which is a positive step.

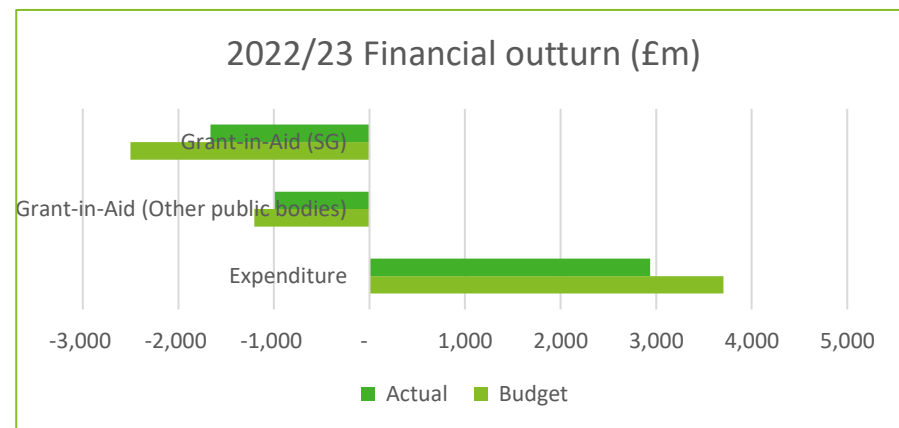
3.3 Wider scope requirements (continued)

Financial management (continued)

Current year financial performance (continued)

As discussed further on page [20](#), Consumer Scotland is part of a shared service arrangement with Scottish Government and uses its financial ledger system. As the system is in the process of being upgraded, with planned implementation from 1 April 2024, Consumer Scotland has been set up as a dedicated Scottish Government cost centre rather than a separate accounting entity. This has resulted in the reporting capabilities from the system being limited. While we recognise this to be a temporary measure, management should ensure that when implemented, the new system provides them with the information required to allow robust monitoring reports to be prepared.

Consumer Scotland has reported a significant underspend against its budget allocation for the first year of operation, as illustrated opposite. The key reasons for the variance is due to a significant underspend in staff costs as a result of all posts not yet being filled as a result of the staggered recruitment over the first year of operation. This position has been regularly reported to the Board and Scottish Government.



Finance capacity

The finance team is led by the Director of Operations and the Finance, Governance and Corporate Services Manager. A Finance and Accountancy Advisor was recruited in the year on a part-time basis for four days per month to provide support at key times throughout the year.

Time is needed for the team to fully embed within Consumer Scotland after one full year cycle. In addition, the implementation of the new Scottish Government ledger system from 1 April 2024 will result in further changes to the work of the team, recognising that the current set up has caused an increased burden for the team. We have not, however, identified any risks with the teams capacity that has impact on the operational financial management of Consumer Scotland. We will continue to monitor this during our audit appointment.

3.4 Wider scope requirements (continued)

Financial management (continued)

Internal controls and internal audit

Consumer Scotland relies upon the financial systems provided by the Scottish Government, in particular the general ledger, purchase ledger and payment of invoices. A detailed Framework Agreement is in place, which was signed in June 2022. This agreement also includes the provision of internal audit services.

We have assessed the internal audit function, including its nature, organisational status and activities performed. The agreed 2021-23 internal audit plan set out plans to provide general advisory work relating to Consumer Scotland establishing and some assurance work to assess the corporate governance arrangements.

We have reviewed the internal audit reports published throughout 2022/23. The conclusions have helped inform our audit work, although no specific reliance has been placed on this work.

Standards of conduct for prevention and detection of fraud and error

We have assessed Consumer Scotland's arrangements for the prevention and detection of fraud and irregularities. This has included specific considerations in response to the Audit Scotland's publication "Fraud and irregularities 2021/22 – sharing risks and case studies to support the Scottish public sector in the prevention of fraud". Overall, we found the arrangements to be designed and implemented appropriately.

Deloitte view – financial management

Consumer Scotland has established sound financial management arrangements during its first 12 months of operation, with timely financial reporting which has evolved during the year. While a significant underspend was reported in the year, this was largely as a result in delays in recruitment as the organisation becomes established and has been closely monitored throughout the year.

The finance team is led by the Director of Operations and the Finance, Governance and Corporate Services Manager and the team has grown in the year, bringing in capacity to support the organisation. We will continue to monitor this during our audit appointment. There is also a robust internal audit function in place and clear arrangements for the prevention and detection of fraud and error.

3.5 Wider scope requirements (continued)

Financial sustainability

Can short term (current and next year) financial balance be achieved?



Is there a medium and longer term plan in place?



Is the body planning effectively to continue to deliver its services or the way in which they should be delivered?



Financial Sustainability

Significant risks identified in Audit Plan

In our Audit Plan we highlighted that a medium term financial plan was yet to be approved and published. There is therefore a risk that robust medium-to-long term planning arrangements are not in place to ensure that Consumer Scotland can manage its finances sustainably and deliver services effectively, identify issues and challenges early and act on them promptly.

2023/24 budget setting

As explained on page [18](#) Consumer Scotland's core budget allocation appears as distinct lines items in the Annual Scottish Budget Bill. The confirmed budget allocation for 2023/24 is £2.4 million. This, together with budgeted Grant-in-aid funding from other public bodies of £1.4 million results in total budgeted expenditure of £3.8 million for 2023/24. The breakdown of this budget was presented to the ARC and Board in March 2023. This provided a granular detail of the proposed budget allocations and assumptions applied and how this compared to previous year costs, demonstrating that a balanced position is expected to be achieved.

The paper provided a high level analysis of the key points for the ARC to note. This could be enhanced in future years by clearly set out the assumptions applied and the key risks.

Medium-to-long term financial planning

As part of the Spending Review, the Scottish Government expects bodies to set an annual efficiency target of 3% and also expects them to explore the scope to maximise the use of shared services across the public sector landscape. We have considered each of these element as applicable to Consumer Scotland as follows.

Savings targets

While the budget update reports to the ARC Board acknowledge the need to find savings, and the budget requests to the Scottish Government offered potential savings, the budget allocations currently do not set out how those will be achieved. This is an area that Consumer Scotland could incorporate into future budget setting papers to demonstrate how it is contributing to the 3% efficiency target.

3.6 Wider scope requirements (continued)

Financial sustainability (continued)

Medium-to-long term financial planning (continued)

Use of shared services

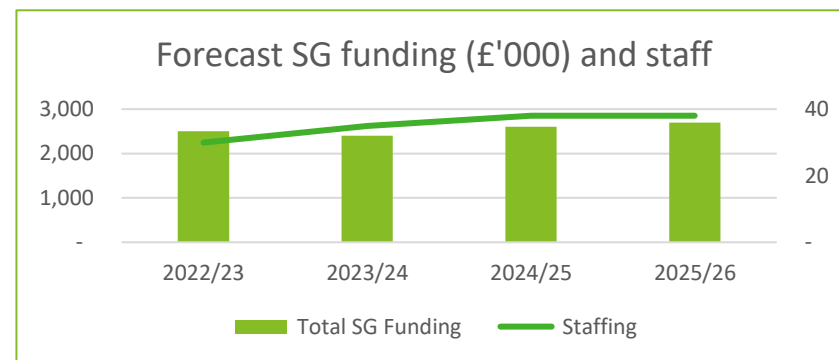
Consumer Scotland currently has a shared service agreement in place with the Scottish Government for the finance system.

In its baseline report on staffing, budget and business planning to the Scottish Government Director General for Net Zero as part of the Public Sector Reform work, Consumer Scotland has also highlighted areas where it is working closely with other public sector bodies. In particular, it is working closely with Environmental Standards Scotland on a number of areas where they could realise synergies and cost savings through a more collaborative approach around accommodation and shared service.

As part of the 2023/24 budget paper to the ARC and Board, management noted its proposals to the Scottish Government that future planning would be assisted through a shared understanding of a multiple year budget profile. As a result, it agreed to develop a 5-year budget profile.

The Executive Team has since set out its overall plans for developing a 2024/25 budget and the development of five year-budget forecasts, with a paper presented to the August 2023 Board meeting. A more detailed report is due to come back to the Board later in the year once this has been developed further.

In January 2023, Consumer Scotland submitted a baseline report on staffing, budget and business planning to the Scottish Government Director General for Net Zero as part of the Public Sector Reform work. This is illustrated below, demonstrating that funding is expecting to increase minimally and is closely aligned with staffing numbers given the high proportion of staff costs.



Strategic planning, financial planning and workforce planning are intrinsically linked and critical to the future success of any organisation. It is therefore positive to see the early thinking on the 2024/25 budget and plans to develop a five year forecast.

Audit Scotland's report, published in June 2014 [Scotland's public finances – A follow-up audit: Progress in meeting the challenges \(audit-scotland.gov.uk\)](https://www.audit-scotland.gov.uk/publications/scotland-s-public-finances-a-follow-up-audit-progress-in-meeting-the-challenges) includes a helpful summary of important features of a financial strategy, as summarised in the next page. We would recommend that the as part of the development of the 5-year strategy, management make reference to this publication as a guide to best practice.

3.7 Wider scope requirements (continued)

Financial sustainability (continued)

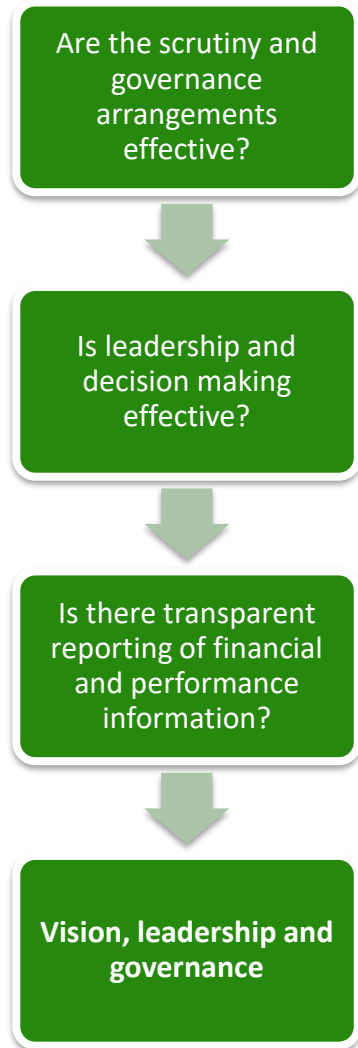
Area	Important features of a financial strategy
Period	A financial strategy should cover 5-10 years.
Cost	A clear understanding of the business model and the cost of individual activities within it
Savings options	Evidence based options for achieving savings
Savings details	Details of one-off and recurring savings
Scenario planning	Scenario planning to outline best, worst and most likely scenarios of the financial position and the assumptions used
Assets/Liabilities and Reserves	Details of assets, liabilities and reserves and how these will change over time
Capital Investment Activity	Details of investment needs and plans and how these will be paid for
Demand	An analysis of levels of service demand and project income
Funding shortfalls	Any income or funding shortfalls and how to deal with these
Strategy links	Clear links to the corporate strategy and other relevant strategies such as workforce and asset management
Risks and timescales	The risks and timescales involved in achieving financial sustainability

Deloitte view – Financial sustainability

Consumer Scotland has achieved financial balance in 2022/23 and has confirmed funding for 2023/24 with an approved balanced budget, therefore is financially sustainability in the short term. While early work has started in developing a medium term outlook, further work is required to full develop this to be able to demonstrate that Consumer Scotland is financially sustainable over the medium to longer term. We have recommended that, as Consumer Scotland develop its five year plan, reference is made to Audit Scotland's publication which sets out the important features of a financial strategy.

3.8 Wider scope requirements (continued)

Vision, leadership and governance



Significant risks identified in Audit Plan

In our Audit Plan we highlighted that the development of its governance arrangements has been a priority since the establishment of Consumer Scotland in April 2022. As a new body, there is a risk that the organisation does not have strong and effective leadership, and robust governance and scrutiny arrangements in place.

Vision and strategy

An Interim Strategic Plan was published in June 2022 setting out how Consumer Scotland intended to carry out its role until its final Strategic Plan was approved by the Scottish Parliament. The interim plan was consultative, and sought feedback before finalising the strategy later in the year. The final Strategic Plan covering the period 2023-2027 was approved in March 2023.

The plan clearly sets out the purpose and ambition of Consumer Scotland, supported by the following strategic objectives:

1. To enhance understanding and awareness of consumer issues by strengthening the evidence base.
2. To service the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sector.
3. To enable the active participation of consumers in a fairer economy by improving access to information and support.

Consumer Scotland plan to develop measures to monitor its impact and influence as an organisation, which we have considered further on page [28](#). The Strategic Plan is supported by an annual work programme setting out how it will start delivering against its Strategic Plan during the first year of the strategy.

3.9 Wider scope requirements (continued)

Vision, leadership and governance

Leadership

A Chief Executive was appointed from June 2022. The successful candidate was the Programme Director during the development and vesting of the organisation therefore brings significant knowledge and experience.

The Executive Team comprise the Chief Executive and three Directors, as summarised below. The full complement of staff is 38, however, as discussed on page [19](#), delays with recruitment have resulted in Consumer Scotland not yet being resourced at this full complement. The Executive Team have all been recruited through external recruitment process and bring with them significant experience.



The Board consisted of four Board members at 31 March 2023, appointed by Scottish Ministers, with the approval of the Scottish Parliament. A fifth Board members is to be appointed later in 2023 to build the breadth of experience. All Board members received on-Board training. In line with best practice and as part of the external governance review discussed below, the Board has carried out a self-assessment of its performance and identified areas for further Board member development. This also considered the skills and experience matrix of the Board, which concluded that the Board and Executive Team have a good coverage of most of the areas of skills and experience identified. This has been used to inform the person specifications for the fifth Board member.

Governance and scrutiny arrangements

The Scottish Government Framework Agreement was signed in June 2022. This sets out the broad framework within which Consumer Scotland operates and defines key roles and responsibilities which underpin the relationship between Consumer Scotland and the Scottish Ministers.

The Board standing orders were updated in April 2023 following a review by the Board to reflect on the first year of operation. A clear governance structure is in place, with the Board being supported by the ARC, and both the Board and ARC supported by the Executive Team.

3.10 Wider scope requirements (continued)

Vision, leadership and governance

Governance and scrutiny arrangements (continued)

Internal Audit carried out an advisory review to provide a “health check” on the key governance, risk and internal control systems established, developing or being planned. While this was not a formal piece of assurance work, internal audit provided “reasonable assurance” regarding the development and implementation of risk, internal control and governance arrangements to date.

Consumer Scotland also commissioned an external review of its governance arrangements, the outcome of which was considered by the Board at its meeting in May 2023. This concluded that Consumer Scotland had come a long way in a short period of time and many key requirements were already in place and the organisation was aware of what still needed work. Key actions were identified from this work which are being taken forward by the Board as part of its review of its performance.

The ARC provide oversight and scrutiny of the risk management activity. A workshop was held in February 2023 to discuss the detail of the Risk Strategy and risk identification process, with a strategic risk register signed off in March 2023.

In line with best practice, the ARC plans to carry out an annual self-assessment of its effectiveness, using the Scottish Government handbook. Given the ARC has not yet been through one full audit cycle, it has agreed to complete this early in 2024.

We have reviewed meetings attendance from the past year and confirm that there has been well attended. In addition, from review of the minutes and observation at meetings, we can confirm that there is sufficient scrutiny and challenge exercised by members during the meetings.

Transparency of reporting

All Board and ARC minutes are publicly available through the Consumer Scotland website. In line with a number of other public sector bodies, consideration should be given to publishing the Board papers to accompany the minutes to enhance the openness and transparency.

At its meeting in June 2023, the Board considered the option of holding its meetings in public. It was agreed that given the profile as an organisation, hosting a Board meeting in public would be unlikely to offer value. It was therefore agreed that a proposal focused initially on public awareness was the preferred option.

The Consumer Scotland website includes a comprehensive suite of information including links to strategies and plans, thereby demonstrating openness and transparency of decision making and performance information (which is considered further on page [28](#)).

3.11 Wider scope requirements (continued)

Vision, leadership and governance

Deloitte view – Vision, leadership and governance

The approved Strategic Plan sets out a clear direction for Consumer Scotland. During its first 12 months of operation, an experience leadership team have been put in place, both at the Executive and non-Executive level.

Effective governance and scrutiny arrangements are in place, underpinned by clear governance documents and demonstrated through high attendance and effective scrutiny and challenge at Board and ARC meetings.

Consumer Scotland is also open and transparent. This could be further enhanced by publishing Board papers online alongside the minutes currently published.

3.12 Wider scope requirements (continued)

Use of resources to improve outcomes



Significant risks identified in Audit Plan

In our Audit Plan we highlighted that as a new organisation, there is a risk that Consumer Scotland does not have well established performance management arrangements in place to demonstrate that resources are being directed and improved outcomes are in place, and that reporting is not timely, reliable, balanced and transparent.

Performance management framework

Consumer Scotland's Strategic Plan notes that it will develop a performance measurement framework, founded on a "logic model" which will help it to identify the contribution it is making to progressing its purpose and strategic objectives. This will set out how its activities and outputs, from research and analysis through to advocacy, contribute to changes in consumer markets and services.

The external review of the governance arrangements, discussed on page [26](#), identified that the development of key performance indicators was critical, but it was important to take time to ensure that these are properly connected to Consumer Scotland's purpose and functions.

Consumer Scotland commissioned "Matter of Focus" to help determine Consumer Scotland's impact as an advocacy body. They have produced an impact framework and set of recommendations which drew on workshops with team and Board members. This is now being taken forward and with proposals to come back to the Board in the Autumn of 2023.

As highlighted in his blog "Christie 10-years on" [Blog: Christie 10-years on | Audit Scotland \(audit-scotland.gov.uk\)](#), the Auditor General for Scotland noted that the Christie report challenged us to make a shift towards prevention and deliver improved long term outcomes for individuals and communities. But we still measure the success of public services by short term, service specific measures. Public bodies need to rethink radically how we measure success and hold organisations to account for their performance. The approach being taken by Consumer Scotland, as set out above, is in line with these recommendations. We will review progress with the development of KPIs and reporting on outcomes throughout our audit appointment.

3.13 Wider scope requirements (continued)

Use of resources to improve outcomes

Performance management framework (continued)

Deloitte view –Use of resources to improve outcomes

Consumer Scotland is in the process of developing its performance management framework. Plans are in place to consider the impact and outcomes of the work that the organisation does, which is in line with best practice. We will continue to monitor how this is developed and implemented during the course of our audit appointment.

3.14 Wider scope requirements (continued)

Best value

Requirements

The Scottish Public Finance Manual (SPFM) explains that Accountable Officers have a specific responsibility to ensure that arrangements have been made to secure Best Value (BV).

Ministerial guidance to Accountable Officers for public bodies sets out their duty to ensure that arrangements are in place to secure Best Value in public services. As part of our wider scope audit work, we have considered whether there are organisational arrangements in place in this regard.

The duty of BV in Public Services is as follows:

- To make arrangements to secure continuous improvement in performance whilst maintaining an appropriate balance between quality and cost; and in making those arrangements and securing that balance;
- To have regard to economy, efficiency, effectiveness, the equal opportunities requirements, and to contribute to the achievement of sustainable development;
- BV characteristics have been recently regrouped to reflect the key themes which will support the development of an effective organisational context from which public services can deliver key outcomes and ultimately achieve best value:
 - Vision and Leadership
 - Governance and Accountability
 - Use of resources
 - Partnership and collaborative working
 - Working with Communities
 - Sustainability
 - Fairness and equality

Conclusions

Consumer Scotland has a number of arrangements in place to secure best value. As noted elsewhere within this report, the Strategic Plan provides a clear purpose and ambition and has specific focus on some of the BV characteristics including partnership and collaboration, sustainability and a focus on continuous improvement. An experienced leadership team have been put in place during the first 12 months of operation. Governance and scrutiny arrangements are effective.

Financial sustainability remains a key risk, as is the case across the public sector. This is recognised by the Board and leadership team, with plans in place to develop a Medium Term Financial Strategy. Plans are also in place to develop a performance management framework with a focus on measuring outcomes.

Deloitte view – Best Value

Consumer Scotland has sufficient arrangements in place to secure best value. It has a clear understanding of areas which require further development. Financial sustainability and the development of a clear performance management framework remain key risks.

3.15 Wider scope requirements (continued)

Climate change

Risks identified in Audit Plan

Tackling climate change is one of the greatest global challenges. The Scottish Parliament has set a legally binding target of becoming net zero by 2045 and has interim targets including a 75% reduction in greenhouse gas emissions by 2030. The public sector in Scotland has a key role to play in ensuring these targets are met and in adapting to the impact of climate change.

The Auditor General and Accounts Commission are developing a programme of work on climate change. This involves a blend of climate change-specific outputs that focus on key issues and challenges as well as moving towards integrating climate change considerations into all aspects of audit work. For the 2022/23 audit, we have provided responses to a series of questions supplied by Audit Scotland to gather basic information on the arrangements for responding to climate change in each body. These are summarised below.

Question	Consumer Scotland position
1. What targets has the body set for reducing emission in its own organisation or in its local area?	No specific targets have been set for Consumer Scotland to reduce emissions other than the overall targets set out within the Climate Change (Scotland) Act 2009.
2. Does the body have a climate change strategy or action plan which sets out how the body intends to achieve its targets?	<p>Consumer Scotland does not have a climate change strategy or action plan setting out how it intends to achieve its targets, in line with the Scottish Government targets.</p> <p>Climate change is, however, referenced within the Strategic Plan as a cross cutting theme where it plans to align its efforts and resources. Consumer Scotland's intends to understand and track consumers' priorities for, and experience of, the transition to net zero. It wants to understand how the transition can be made easier for consumers on lower incomes or who face other disadvantages, to make sure they are not excluded. It plans to use its insights to help inform the design of net zero and adaptation policy and practice across the public and private sector.</p>

3.16 Wider scope requirements (continued)

Climate change

Question	Consumer Scotland position
3. How does the body monitor and report progress towards meeting its emissions targets internally and publicly?	As Consumer Scotland was just established on 1 April 2022, its first annual Climate Change Report will be submitted in November 2023 in line with climate change duties under the Climate Change (Scotland) Act. A baseline and an internal reporting mechanism has still to be developed.
4. Has the body considered the impact of climate change on its financial statements?	No specific consideration has been given to the impact of climate change on the financial statements. Given the type of public sector organisation, based in one main office site, the expected impact on the financial statements is minimal.
5. What are the areas of the financial statements where climate change has, or is expected to have, a material impact?	As above, given the type of public sector organisation, the expected impact on the financial statements is minimal. Areas that are being considered around hybrid working, travel and transport and waste management are likely to have an impact on the ongoing annual costs recognised in the financial statements.
6. Does the body include climate change in its narrative reporting which accompanies the financial statements and is consistent with those financial statements?	Consumer Scotland has included a section on “environmental and sustainability” within the Annual Report and Accounts setting out the work done to date around hybrid working and impact on travel. As the organisation matures, consideration should be given to expanding this reporting further to incorporate any specific plans that are in place to achieve the targets and provide hyperlinks to other reporting.

Deloitte view – Climate change

As a public sector body with one office site, and as a consequence relatively low carbon emissions, the opportunities for emissions reductions are limited. The Strategic Plan has a clear commitment on the work that Consumer Scotland can do to contribute to the target of net zero and the Annual Report and Accounts also includes a section on work done to date. It is therefore clear that Consumer Scotland is committed to take action to meet the Scottish Government’s ambitious targets. As the organisation matures, we recommend that a Strategy or Action Plan is developed to set out how the organisation plans to contribute to the targets to allow regular reporting against baseline data.

3.17 Wider scope requirements (continued)

Cyber risk

Area	Management actions	Impact on Consumer Scotland's Annual Report and Accounts	Impact on our audit
Cyber risk	<p>Consumer Scotland recognise cyber risk as part of its wider strategic risk around Business Continuity register which is monitored by the ARC and Board.</p> <p>In response to the strategic risk, internal audit has included plans as part of the 2023/24 Internal Audit Plan to carry out a piece risk assessment which includes cyber security risks.</p>	<p>No reference to cyber risk is included in the Annual Report and Accounts.</p> <p>This is an area that should be considered in future Annual Reports.</p>	<p>We have obtained an understanding the business and its internal controls in relation to cyber including assessing the maturity and coverage of the entity's cyber risk management programme.</p> <p>We obtained an understanding of the relevant laws and regulations in relation to the entity.</p>

4.1 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 Audit and Risk Committee and Consumer Scotland 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 and Accounts.
- Our internal control observations.
- 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 Annual Report and Accounts.

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

Use of this report

This report has been prepared for Consumer Scotland, 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.

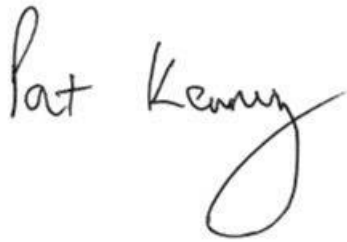
What we don't report

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

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 audit of the Annual Report and Accounts and the other procedures performed in fulfilling our audit plan.

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



Deloitte LLP
Glasgow | 29 September 2023

Appendices



5.1 Action Plan

The following recommendations have arisen from our 2022/23 audit work:

Recommendation	Management Response	Priority	Responsible Person	Target Date
<p>1. Review of year-end accruals and trade payables Our testing highlighted several errors within the year-end accruals and payables classification. Although no impact to the financial statements performance, a review of the classification should be done more appropriately based on when invoice is received and when the accrual or payable should be recorded.</p>	<p>Management will reconsider and update the year-end accruals and other payables review processes.</p> <p>Particular focus will be made to confirm the correct classification of transactions. In addition to checking the underlying timing of receipt of the good or service, the invoice date, invoice received date and processing date will all be checked before concluding on the correct classification.</p> <p>An additional documented check of invoices recorded on SEAS for period 12 in the financial year and period 1 of the new financial year will be carried out 1 month after the year end as a detective control over the correct classification of any late received invoices.</p>	Low	Finance and Governance Manager/ Accountant	December 2023 (Documentation) April 2024 (Operation)

5.2 Action Plan

The following recommendations have arisen from our 2022/23 audit work:

Recommendation	Management Response	Priority	Responsible Person	Target Date
2. Review of Holiday Pay Accrual and tracking of holiday leave As part of our observation, we noted that a review of the holiday tracker schedule which forms the basis of the holiday pay accrual has not been reviewed prior to calculations being made. Employees directly update the schedule as and when leave is taken but there is no control to ensure the leave numbers are appropriate. We recommend that the leave balance is reviewed, with evidence of review retained, in advance of the holiday pay accrual calculation being performed.	<p>The current manual system operates via Word and Excel and will be replaced in November 2023 with an app based HR management system which should resolve the issues identified during the audit.</p> <p>Management is reviewing the current interim holiday tracking process to build in additional oversight and control. This could involve restricting edit access and building in additional email approval routes.</p>	Medium	Director of Operations	November 2023

5.3 Action Plan

Recommendation	Management Response	Priority	Responsible Person	Target Date
<p>3. Financial Sustainability Budget papers to the ARC and Board could be enhanced in future years by clearly setting out the assumptions applied and the key risks.</p>	<p>Management will review the budgetary reporting process to ensure that, in future, any budget reports provided to the ARC and Board, include details of the relevant underlying assumptions and key risks.</p>	Medium	Director of Operations	December 2023
<p>4. Financial sustainability We would recommend that the next stage in the development of a finance strategy should set out contextually more detail around the assumptions and risks impacting the medium term and how CS propose to address the potential funding gaps, based on Audit Scotland publication of best practice.</p>	<p>Management continues to develop a finance strategy that will enable Consumer Scotland to fulfil its objectives.</p> <p>Management will review the financial aspects of Consumer Scotland's strategy to ensure that the key assumptions and risks over the medium term are fully considered. This will include details of how any potential funding gaps could be addressed.</p>	Medium	Director of Operations	December 2023

5.4 Action Plan

Recommendation	Management Response	Priority	Responsible Person	Target Date
<p>5. Vision, leadership and governance Consideration should be given to publishing the Board papers to accompany the minutes to enhance the openness and transparency.</p>	<p>Management will give consideration to how openness and transparency could be enhanced. There is already a paper scheduled for the December Board meeting to propose how the board could be more accessible to the public. Management will include the question of publishing board papers as part of this discussion.</p>	Low	Director of Operations	December 2023
<p>6. Climate Change A Climate Change Strategy or Action Plan should be developed to set out how the organisation plans to contribute to the targets and to allow regular reporting against baseline data.</p>	<p>The requirement for Consumer Scotland to produce a mandatory report on sustainability activity by 30th November 2023 has now been changed to a voluntary submission. Management will continue to develop the plan already in progress to ensure that we are demonstrating our commitment and action towards the climate change agenda. This report will be discussed and agreed with the board before being submitted.</p>	Low	Director of Operations	December 2023

5.3 Audit adjustments

Corrected misstatements

The following misstatements have been identified up to the date of this report which have been corrected by management. We nonetheless communicate them to you to assist you in fulfilling your governance responsibilities, including reviewing the effectiveness of the system of internal control.

		Debit/(credit) SOCNE £	Debit/(credit) in net assets £	Debit/(credit) prior year reserves £	Debit/(credit) Equity £	If applicable, control deficiency identified
Accruals	[1]	-	(7,500)	-	-	
Trade payables	[1]	-	7,500	-	-	
Total		-	-	-	-	

[1] This misstatement occurred due to misclassification as accrual or trade payable as at year-end mainly base on reviews performed by the accountant No impact on Statement of comprehensive net expenditure for the year.

6.1 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 Annual Report and Accounts as a whole are free from material misstatement, whether caused by fraud or error.

Required representations:

We have asked Consumer Scotland to confirm in writing that you have disclosed to us the results of your own assessment of the risk that the Annual Report and Accounts may be materially misstated as a result of fraud and that you are not aware of any fraud or suspected fraud that affects the entity.

We have also asked Consumer Scotland to confirm in writing their responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud and error and their belief that they have appropriately fulfilled those responsibilities.



Audit work performed:

In our planning we identified the risk of fraud in operating within expenditure resource limits ,management override of controls as key audit risks.

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 Annual Report and Accounts.

We have reviewed the paper prepared by management for the Audit and Risk Committee on the process for identifying, evaluating and managing the system of internal financial control.

We will explain in our audit report (for all entities subject to audit) how we considered the audit capable of detecting irregularities, including fraud. In doing so, we will describe the procedures we performed in understanding the legal and regulatory framework and assessing compliance with relevant laws and regulations.

Concerns:

No issues or concerns have been identified in relation to fraud.

7.1 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 Consumer Scotland and our objectivity is not compromised.										
Fees	<p>The expected fee for 2022/23, as communicated by Audit Scotland in December 2022 is analysed below:</p> <p style="text-align: center;">£</p> <table><tr><td>Auditor remuneration</td><td style="text-align: right;">45,530</td></tr><tr><td>Audit Scotland fixed charges:</td><td></td></tr><tr><td> • Pooled costs</td><td style="text-align: right;">3,020</td></tr><tr><td> • Audit support costs</td><td style="text-align: right;">1,600</td></tr><tr><td>Total expected fee</td><td style="text-align: right;">50,150</td></tr></table>	Auditor remuneration	45,530	Audit Scotland fixed charges:		• Pooled costs	3,020	• Audit support costs	1,600	Total expected fee	50,150
Auditor remuneration	45,530										
Audit Scotland fixed charges:											
• Pooled costs	3,020										
• Audit support costs	1,600										
Total expected fee	50,150										
Non-audit services	In our opinion there are no inconsistencies between the FRC's Ethical Standard and Consumer Scotland'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 have no other relationships with Consumer Scotland, its directors, senior managers and affiliates, and have not supplied any services to other known connected parties.										



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