Who we are

The Auditor General, the Accounts Commission and Audit Scotland work together to deliver public audit in Scotland:

- The Auditor General is an independent crown appointment, made on the recommendation of the Scottish Parliament, to audit the Scottish Government, NHS and other bodies and report to Parliament on their financial health and performance.

- The Accounts Commission is an independent public body appointed by Scottish ministers to hold local government to account. The Controller of Audit is an independent post established by statute, with powers to report directly to the Commission on the audit of local government.

- Audit Scotland is governed by a board, consisting of the Auditor General, the chair of the Accounts Commission, a non-executive board chair, and two non-executive members appointed by the Scottish Commission for Public Audit, a commission of the Scottish Parliament.

About us

Our vision is to be a world-class audit organisation that improves the use of public money.

Through our work for the Auditor General and the Accounts Commission, we provide independent assurance to the people of Scotland that public money is spent properly and provides value. We aim to achieve this by:

- carrying out relevant and timely audits of the way the public sector manages and spends money
- reporting our findings and conclusions in public
- identifying risks, making clear and relevant recommendations.
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Risks and planned work

1. This annual audit plan contains an overview of the planned scope and timing of our audit and is carried out in accordance with International Standards on Auditing (ISAs), the Code of Audit Practice, and any other relevant guidance. The plan sets out the work necessary to allow us to provide an independent auditor’s report on the financial statements and meet the wider scope requirements of public sector audit.

2. The wider scope of public audit contributes to assessments and conclusions on financial management, financial sustainability, governance and transparency and value for money.

Adding value

3. We aim to add value to the National Galleries of Scotland (NGS) through our external audit work by being constructive and forward looking, by identifying areas for improvement and by recommending and encouraging good practice. We intend to help NGS promote improved standards of governance, better management and decision making and more effective use of resources.

Audit risks

4. Based on our discussions with management, attendance at Audit & Risk Committee meetings and a review of supporting information we have identified the following main risk areas for NGS. The key audit risks, which require specific audit testing, are detailed in Exhibit 1.

**Exhibit 1**
**2018/19 Key audit risks**

<table>
<thead>
<tr>
<th>Audit Risk</th>
<th>Source of assurance</th>
<th>Planned audit work</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Financial statements issues and risks</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Risk of management override of controls</td>
<td>Owing to the nature of this risk, assurances from management are not applicable.</td>
<td>• Detailed testing of journal entries.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Review of accounting estimates and accounting policies.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Focused testing of accruals and prepayments.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Substantive cut-off testing of income and expenditure to ensure that these have been recognised in the correct financial year.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Evaluation of significant transactions that are outside the normal course of business.</td>
</tr>
</tbody>
</table>

ISA 240 requires that audit work is planned to consider the risk of fraud, which is presumed to be a significant risk in any audit. This includes consideration of the risk of management override of controls to change the position disclosed in the financial statements.
### Audit Risk

<table>
<thead>
<tr>
<th>2 Risk of fraud over income and expenditure</th>
<th>Source of assurance</th>
<th>Planned audit work</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGS receives a significant amount of income and donations from various sources, in addition to Scottish Government (SG) funding. The extent and complexity of income means that, in accordance with ISA240, there is an inherent risk of fraud which requires an audit response. The Code of Audit Practice expands the ISA assumption to advise there is also a risk of fraud over aspects of expenditure, for public sector bodies.</td>
<td>Effective budget monitoring by management. Governance arrangements including the Fraud Policy, Bribery Policy and Whistleblowing Policy in place. Participation in the National Fraud Initiative.</td>
<td>• Detailed testing of income and expenditure transactions focusing on the areas of greatest risk. • Substantive cut-off testing of income to ensure that it has been recognised in the correct financial year. • Audit work on the National Fraud Initiative data matches.</td>
</tr>
</tbody>
</table>

### Estimation and judgements

<table>
<thead>
<tr>
<th>3 Estimation and judgements</th>
<th>Source of assurance</th>
<th>Planned audit work</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is a significant degree of subjectivity in the measurement and valuation of the material account areas of non-current assets, liabilities (provisions, deferred income and accruals) and donated heritage asset additions. This includes the planned capital additions comprising the extension at the Scottish National Gallery and the National Collection Facility. This subjectivity represents an increased risk of misstatement in the financial statements.</td>
<td>Management review grant conditions of each grant received and apply revenue recognition criteria appropriately (i.e. in line with the Charities’ SORP). Assessment of all potential provisions together with assessing potential liability and likelihood of settlement. Use of RICS indices for indexing properties. Sound procedures for indexation which are reflected accurately in the financial statements. Heritage assets bought on the open market are capitalised at acquisition cost. Where this is not readily available, we will obtain an expert valuation of heritage asset additions by a qualified expert.</td>
<td>• Focused substantive testing during the financial statements audit of key areas. • Substantive testing of liabilities and cut-off testing of income and expenditure • Review of accounting policies to ensure these are reasonable and in line with the accounting framework. • Assessment of indexation factors applied to fixed assets to ensure these are from a reliable source.</td>
</tr>
</tbody>
</table>

### Financial sustainability

<table>
<thead>
<tr>
<th>4 Financial sustainability</th>
<th>Source of assurance</th>
<th>Planned audit work</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGS, similar to other public sector bodies, face challenges and uncertainty over future funding allocations. The main financial target for NGS is to maintain a stable and sustainable financial environment and adequate financial outturn for the year, compared to the budget allocated by Scottish Ministers.</td>
<td>Effective budget monitoring by the finance team. Regular financial reporting to the Board and Audit &amp; Risk Committee. Ongoing communication with the Scottish Government sponsor division.</td>
<td>• Discussions with senior finance staff regarding budget plans and finance reports. • Focused cut-off testing at year-end to confirm expenditure and income has been accounted for in the correct financial year.</td>
</tr>
<tr>
<td>Audit Risk</td>
<td>Source of assurance</td>
<td>Planned audit work</td>
</tr>
<tr>
<td>------------</td>
<td>---------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>Although NGS are forecasting a small excess of income over expenditure in 2018/19, the organisation continues to face a risk over its financial sustainability in the coming years due to uncertainty over future funding allocations and income sources.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ongoing assessment of NGS’s cyber security arrangements in line with the Scottish Government’s Cyber Essentials plus. Plan to achieve Cyber Essentials Plus accreditation by October 2019.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Monitor ongoing work within the IT department to ensure the Public Sector Action Plan is being followed and implemented.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5. In our 2017/18 Annual Audit Report, we reported our audit findings and agreed management action to address these. We will follow-up progress against these issues throughout this year’s audit and report in our Annual Audit Report.

Wider dimensions risks

6. Audit Scotland’s Guidance on Planning the Audit 2018/19 highlights the following areas, which are risk areas for all audited bodies in 2018/19:

- EU withdrawal
- Changing landscape for public financial management
- Dependency on key suppliers (for example Interserve)
- Openness and transparency.

7. We will consider these risks in the context of NGS during our audit work and ongoing risk assessment and report any relevant findings in our Annual Audit Report.

Reporting arrangements

8. Audit reporting is the visible output for the annual audit. All annual audit plans and the outputs as detailed in Exhibit 2, and any other outputs on matters of public interest will be published on our website: www.audit-scotland.gov.uk, after the NGS’s annual report and financial statements have been laid before the Scottish Parliament.

9. Matters arising from our audit will be reported on a timely basis and will include agreed action plans. Draft management reports will be issued to the management to confirm factual accuracy.

10. We will provide an independent auditor’s report to NGS, Scottish Parliament and the Auditor General for Scotland setting out our opinions on the annual report and financial statements. We will provide the Accountable Officer and Auditor General for Scotland with an annual report on the audit containing
observations and recommendations on significant matters which have arisen during the audit.

### Exhibit 2
2018/19 Audit outputs

<table>
<thead>
<tr>
<th>Audit Output</th>
<th>Target date</th>
<th>Committee Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Audit Plan</td>
<td>26 February 2019</td>
<td>26 February 2019</td>
</tr>
<tr>
<td>Annual Audit Report</td>
<td>3 September 2019</td>
<td>3 September 2019</td>
</tr>
<tr>
<td>Independent Auditor's Report</td>
<td>9 September 2019</td>
<td>9 September 2019</td>
</tr>
</tbody>
</table>

*Source: Audit Scotland*

### Audit fee

11. The audit fee for the 2018/19 audit of National Galleries of Scotland is £23,010 [2017/18: £22,560]. In determining the audit fee we have taken account of the risk exposure of NGS, the planned management assurances in place and the level of reliance we plan to take from the work of internal audit. Our audit approach assumes receipt of the unaudited annual report and financial statements for the year ended 31 March 2019, with a complete working papers package on 21 June 2019.

12. Where our audit cannot proceed as planned through, for example, late receipt of unaudited financial statements or being unable to take planned reliance from the work of internal audit, a supplementary fee may be levied. An additional fee may also be required in relation to any work or other significant exercises out with our planned audit activity.

### Responsibilities

#### Audit Committee and Accountable Officer

13. Audited bodies have the primary responsibility for ensuring the proper financial stewardship of public funds, compliance with relevant legislation and establishing effective arrangements for governance, propriety and regularity that enable them to successfully deliver their objectives.

14. The audit of the annual report and financial statements does not relieve management or the Audit & Risk Committee, as those charged with governance, of their responsibilities.

#### Appointed auditor

15. Our responsibilities as independent auditors are established by the Public Finance and Accountability (Scotland) Act 2000 and the Code of Audit Practice (including supplementary guidance) and guided by the Financial Reporting Council’s Ethical Standard.

16. Auditors in the public sector give an independent opinion on the financial statements. We also review and report on the arrangements within the audited body to manage its performance, regularity and use of resources. In doing this, we aim to support improvement and accountability.
Audit scope and timing

Financial statements

17. The financial statements audit will be the foundation and source for most of the audit work necessary to support our judgements and conclusions. We also consider the wider environment and challenges facing the public sector. Our audit approach includes:

- understanding the business of NGS and the associated risks which could impact on the financial statements
- confirming the operation of key controls within each of the NGS key financial systems through walkthrough testing
- identifying major transaction streams, balances and areas of estimation and understanding how NGS will include these in the financial statements
- assessing the risks of material misstatement in the financial statements
- determining the nature, timing and extent of audit procedures necessary to provide us with sufficient audit evidence as to whether the financial statements are free of material misstatement.

18. We will give an opinion on the financial statements as to:

- whether they give a true and fair view of the state of affairs of NGS and its income and expenditure for the year ended 31 March 2019;
- whether they have been properly prepared in accordance with relevant legislation, the applicable accounting framework and other reporting requirements for charitable bodies;
- the regularity of the expenditure and income.

Other information in the annual report

19. We also review and report on other information published within the annual report including the trustees’ annual report and governance statement. We give an opinion on whether these have been compiled in accordance with the appropriate regulations and frameworks in our independent auditor’s report.

Materiality

20. We apply the concept of materiality in planning and performing the audit. It is used in evaluating the effect of identified misstatements on the audit, and of any uncorrected misstatements, on the financial statements and in forming our opinions in the independent auditor’s report.

21. We calculate materiality at different levels as described below. The calculated materiality values for NGS are set out in Exhibit 3.
### Exhibit 3
#### Materiality values

<table>
<thead>
<tr>
<th>Materiality</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning materiality</td>
<td>£3.385 million</td>
</tr>
<tr>
<td>Performance materiality</td>
<td>£1.693 million</td>
</tr>
<tr>
<td>Reporting threshold (i.e., clearly trivial)</td>
<td>£0.034 million</td>
</tr>
</tbody>
</table>

- **Planning materiality** – This is the calculated figure we use in assessing the overall impact of audit adjustments on the financial statements. It has been set at 1% of total assets for the year ended 31 March 2018 based on the latest audited accounts. We have used total assets as the basis for calculating materiality, as a primary function of NGS is to operate as a custodian of public assets. This treatment is in line with ISA 320 and Practice Note 10: Audit of Financial Statements of Public Sector Bodies in the United Kingdom.

- **Performance materiality** – This acts as a trigger point. If the aggregate of errors identified during the financial statements audit exceeds performance materiality this would indicate that further audit procedures should be considered. Using our professional judgement, we have calculated performance materiality at 50% of planning materiality.

- **Reporting threshold (i.e., clearly trivial)** – We are required to report to those charged with governance on all unadjusted misstatements more than the ‘reporting threshold’ amount. This has been calculated at 1% of planning materiality.

Source: Audit Scotland

### Timetable

22. To support the efficient use of resources it is critical that the annual accounts timetable is agreed with us to produce the unaudited accounts. We have included an agreed timetable at Exhibit 4.

### Exhibit 4
#### Financial statements timetable

<table>
<thead>
<tr>
<th>Key stage</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latest submission date of unaudited annual report and financial statements with complete working papers package</td>
<td>21 June 2019</td>
</tr>
<tr>
<td>Latest date for final clearance meeting with Chief Operating Officer, Director of Finance and Financial Controller</td>
<td>12 July 2019</td>
</tr>
<tr>
<td>Latest date for issue of draft Annual Audit Report, including ISA 260 requirements</td>
<td>19 July 2019</td>
</tr>
<tr>
<td>Latest date for management comments on factual accuracy of draft Annual Audit Report.</td>
<td>2 August 2019</td>
</tr>
<tr>
<td>Agreement of audited unsigned Trustees’ Annual Report and Financial Statements; Issue of Annual Audit Report to those charged with governance</td>
<td>9 August 2019</td>
</tr>
<tr>
<td>Presentation of our Annual Audit Report to the Audit &amp; Risk Committee</td>
<td>3 September 2019</td>
</tr>
<tr>
<td>Approval of the Trustees’ Annual Report and Financial Statements by the Board of Trustees</td>
<td>9 September 2019</td>
</tr>
<tr>
<td>Independent auditor’s report signed</td>
<td>10 September 2019</td>
</tr>
</tbody>
</table>
**Internal audit**

23. Internal audit is provided by Henderson Loggie. Auditing standards require internal and external auditors to work closely together to make best use of available audit resources. As part of our planning process we carry out an annual assessment of the internal audit function to ensure that it operates in accordance with Public Sector Internal Audit Standards (PSIAS).

24. As Henderson Loggie are the internal auditors for a number of shared clients with Audit Scotland, we have completed a central review of the adequacy of their work and compliance with the Public Sector Internal Audit Standards (PSIAS). This review, completed by our Audit Services Group in December 2018, concluded that Henderson Loggie's policies and practices are compliant with the PSIAS.

25. We will also complete a local review of internal audit arrangements for NGS. We will review the findings of all internal audit reports and consider the impact of any findings on our audit approach. As we intend to focus our external audit on substantive testing we will not place formal reliance on the work of internal audit to support our audit opinion on the financial statements. We will report any significant findings to Audit & Risk Committee in due course.

**National Fraud Initiative (NFI)**

26. NFI is a data-matching exercise led by Audit Scotland to aid the detection of fraudulent payments. NFI allows public bodies to investigate matches and, if fraud or error has taken place, to stop payments and attempt to recover the amounts involved. It also allows auditors to assess the arrangements that the bodies have put in place to prevent and detect fraud, including how they approach the NFI exercise itself.

27. The current data matching exercise collected data in October 2018. Match investigation work is currently underway and participating bodies expect results at the end on January 2019. Over the past two years of our audit appointment we reported that NGS is committed to the NFI exercise and has been proactive in investigating data matches. No cases of fraud or error have been found to date. We are due to submit an audit questionnaire by the end of June 2019 to report on the NGS’s NFI progress. We will report any further findings to the Audit & Risk Committee in due course.

**Whole of Government Accounts**

28. The Code of Audit Practice requires appointed external auditors to review and report on whole of government accounts (WGA) returns prepared by audited bodies. External auditors of Central Government entities are required to certify 2018/19 WGA returns, as in prior years. We do not expect NGS to be within the boundary determined by HM Treasury for WGA for the 2018/19 year. We will, however, monitor this position throughout the year and report accordingly following the year end.
Audit dimensions

29. Our audit is based on four audit dimensions that frame the wider scope of public sector audit requirements as shown in Exhibit 5.

Exhibit 5
Audit dimensions

Financial sustainability

30. As auditors we consider the appropriateness of the use of the going concern basis of accounting as part of the annual audit. We will also comment on the body’s financial sustainability in the longer term. We define this as short term (up to two years), medium term (two to five years) and longer term (longer than five years) sustainability. We will carry out work and conclude on:

- the effectiveness of financial planning in identifying and addressing risks to financial sustainability in the short, medium and long term
- the appropriateness and effectiveness of arrangements in place to address any identified funding gaps
- whether NGS can demonstrate the affordability and effectiveness of funding and investment decisions it has made.

Financial management

31. Financial management is concerned with financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively. We will review, conclude and report on:

- whether NGS has arrangements in place to ensure systems of internal control are operating effectively
- whether NGS can demonstrate the effectiveness of budgetary control system in communicating accurate and timely financial performance
- how NGS has assured itself that its financial capacity and skills are appropriate
- whether NGS has established appropriate and effective arrangements for the prevention and detection of fraud and corruption
• how NGS meets the requirements of the National Fraud Initiative.

**Governance and transparency**

32. Governance and transparency are concerned with the effectiveness of scrutiny and governance arrangements, leadership and decision – making and transparent reporting of financial and performance information. We will continue to review, conclude and report on:

- whether NGS can demonstrate that the governance arrangements in place are appropriate and operating effectively
- whether there is effective scrutiny, challenge and transparency on the decision-making and finance and performance reports
- the quality and timeliness of financial and performance reporting.

**Value for money**

33. Value for money refers to using resources effectively and continually improving services. We will review, conclude and report on whether:

- NGS can provide evidence that it is demonstrating value for money in the use of its resources
- NGS can demonstrate that there is a clear link between money spent, output and outcomes delivered
- NGS can demonstrate that outcomes are improving
- There is sufficient focus on improvement and the pace of it.

**Best value**

34. Best Value (BV) duties apply across the public sector. For sectors other than local government, the Scottish Public Finance Manual (SPFM) explains that accountable officers have a specific responsibility to ensure that arrangements have been made to secure BV.

35. There is an expectation that equalities will be reviewed through the audit process. Auditors should aim to consider this area at least once during their audit appointment. We will consider when is the best time to carry out this work and report back to the Audit & Risk Committee in due course.

**Independence and objectivity**

36. Auditors appointed by the Auditor General and Accounts Commission must comply with the Code of Audit Practice and relevant supporting guidance. When auditing the financial statements auditors must also comply with professional standards issued by the Financial Reporting Council and those of the professional accountancy bodies. These standards impose stringent rules to ensure the independence and objectivity of auditors. Audit Scotland has robust arrangements in place to ensure compliance with these standards including an annual “fit and proper” declaration for all members of staff. The arrangements are overseen by the Director of Audit Services, who serves as Audit Scotland’s Ethics Partner.

37. The engagement lead (i.e. appointed auditor) for the National Galleries of Scotland is Asif A Haseeb. Auditing and ethical standards require the appointed auditor to communicate any relationships that may affect the independence and objectivity of audit staff. We are not aware of any such relationships pertaining to the audit of National Galleries of Scotland.

38. The core audit team largely remains the same as last year. In 2018/19, Taiba Hussain will be the lead auditor and main point of contact.
Quality control

39. International Standard on Quality Control (UK and Ireland) 1 (ISQC1) requires that a system of quality control is established, as part of financial audit procedures, to provide reasonable assurance that professional standards and regulatory and legal requirements are being complied with and that the independent auditor’s report or opinion is appropriate in the circumstances.

40. The foundation of our quality framework is our Audit Guide, which incorporates the application of professional auditing, quality and ethical standards and the Code of Audit Practice (and supporting guidance) issued by Audit Scotland and approved by the Auditor General for Scotland. To ensure that we achieve the required quality standards Audit Scotland conducts peer reviews and internal quality reviews. Additionally, the Institute of Chartered Accountants of Scotland (ICAS) have been commissioned to carry out external quality reviews.

41. As part of our commitment to quality and continuous improvement, Audit Scotland will periodically seek your views on the quality of our service provision. We welcome feedback at any time and this may be directed to the engagement lead.