



Scottish Land Commission  
Coimisean Fearainn na h-Alba

# Annual Report and Accounts

2024/25

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Laid before the Scottish Parliament in pursuance of Section 20 Schedule 2, paragraph C of the Land Reform (Scotland) Act 2016.



Scottish Land Commission  
Coimisean Fearainn na h-Alba

To the Right Honourable John Swinney  
His Majesty's First Minister

**Dear First Minister**

We have the honour to present the sixth Annual Report and Accounts of the Scottish Land Commission covering the year 2024/25.

Yours sincerely

A handwritten signature in black ink.

Michael Russell, Chair

A handwritten signature in black ink.

Hamish Trench, Chief Executive

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# Performance Report



## Overview

The performance report provides a summary of the Scottish Land Commission, our purpose, objectives and performance over the year and also the impact and management of key risks facing the organisation.

## Foreword

### From the Chair and Chief Executive of the Scottish Land Commission

How land is owned and used is central to the Scottish Government's ambitions to grow the economy, address climate change and tackle inequalities. Our work in 2024/25 focused on how reforms to land ownership and use deliver on these national priorities.

During the year Scottish Government introduced phase one of the Land Reform Bill to parliament, a bill which draws on significant previous research undertaken by the Commission. Since publication the Commission has provided further advice to help ensure the proposed measures have the impact government seeks. The Bill introduces significant changes that will regulate large land holdings in the public interest as well as further changes to agricultural tenure.

Our Good Practice Programme has supported over 80 cases providing advice to individuals, communities, landowners and charities. This includes proactive advice on community engagement and community benefit, and cases where concerns are raised about conduct that does not meet the expectations of Scotland's Land Rights and Responsibilities Statement.

The availability of land for housing in an effective place and at a viable price is a key part of delivering on Scotland's housing emergency. We published a proposal for a step-change in the role that public bodies play in creating a long-term pipeline of land for housing in rural Scotland, backed by new research.

We continued to publish annual reports on insights and transactions data in the rural land market. Now in its fourth year of reporting, this data is providing valuable analysis to inform the land reform bill and wider policy and practice.

The Commission began work this year to deliver on the Scottish Government's commitment in its tax strategy to explore the role of tax in meeting land reform and land use change for net zero. We also began work to support the Scottish Government's Review of Community Rights to Buy, including establishing a reference group to support and advise on the review.

This year we welcomed to the board of the Commission two new Land Commissioners and a new Tenant Farming Commissioner, taking up their posts in December 2024.



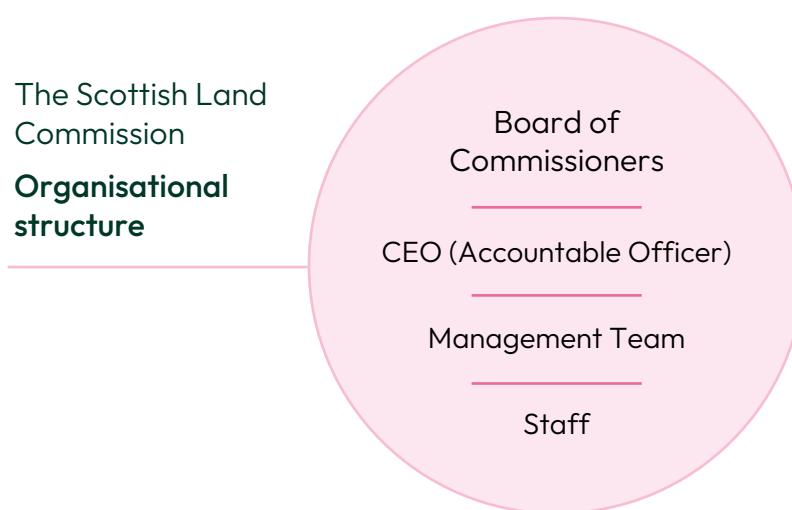
Michael Russell  
**Chair**  
**Cathraighe**



Hamish Trench  
**Chief Executive**  
**Ceannard**

## Who we are

The Scottish Land Commission is a non-departmental public body (NDBP) established on 1 April 2017 by the Land Reform (Scotland) Act 2016. The Commission has five Land Commissioners and one Tenant Farming Commissioner, all of whom are appointed by Scottish Ministers. The organisation is based in Inverness and employs a team of 17 staff (as at 31 March 2025) led by Chief Executive Hamish Trench. Our core work is fully funded by the Scottish Government with a budget of £1.615m for 24/25.



The Land Commissioners (left to right): Rob Black (Tenant Farming Commissioner), Dr Calum MacLeod, Professor Deb Roberts, Michael Russell (Chair), Dr Lucy Beattie and Dr Craig Mackenzie.

# What we do

The role of the Scottish Land Commission is to stimulate fresh thinking and change in how Scotland owns and uses land and advise Scottish Government on an ongoing programme of land reform. As well as providing advice and recommendations for law and policy, we provide leadership for change in culture and practice.





## Strategic outcomes

We are focussed on achieving meaningful, long-term outcomes for people, power and prosperity. Delivering these will mean more people are empowered, misuse of power where it occurs is challenged and opportunities for prosperity are unlocked. The outcomes will help to achieve the progressive realisation of economic, social and cultural rights that drive Scotland's approach to land reform.

We work to achieve the following outcomes:



### People

People participate in and influence decisions about how land is used.



### Power

Power and control in land is shared more widely through diverse ownership and governance.



### Prosperity

The value and benefits of land are used fairly to create economic prosperity and wellbeing.

We will deliver our strategy by doing the following:

- **Advising** on reforms to law, policy and practice: we will provide evidence, analysis and advice to Scottish Ministers, Parliament and stakeholders.
- **Supporting** practical implementation of Scotland's Land Rights and Responsibilities Statement (LRRS): we will provide advice and guidance to help people and organisations implement the LRRS principles including through the delivery of the Good Practice Programme.
- **Promoting** good relations between agricultural landlords and tenants through the functions of the Tenant Farming Commissioner: we will support the delivery of statutory functions of the Tenant Farming Commissioner, seeking synergies with our wider work programme.
- **Engaging** people in why land matters and how they can be involved: we will involve the public and stakeholders in our work, build collaboration and use our convening role to bring different expertise and perspectives together with a shared focus.

### How we do it

We deliver our strategic plan and outcomes through:

- **Research and policy advice:** providing evidence, analysis, advice and recommendations to Scottish Ministers, Parliament and stakeholders;
- **Leading change in practice:** providing clear expectations and support to help people and organisations implement Scotland's Land Rights and Responsibilities Statement;
- **Supporting the Tenant Farming Commissioner:** delivering the statutory functions to promote good relationships between agricultural landlords and tenants;
- **Engaging stakeholders and the public** in shaping our work and increasing the impact of what we do.

In 2024/25 we continued to deliver on our 2023-26 strategic plan. The Commission conducted research and analysis, public engagement and events, making recommendations for significant changes in law and policy, as well as supporting more immediate changes in culture and practice.

Towards the end of the year we developed a refreshed Programme of Work, published on 1st April 2025, which guides our prioritisation over the second 18-month period of our current strategic plan. Our business planning for the year ahead sets out how we deliver on the programme of work and allocate our resources.

## Our structure of delivery

The Scottish Government's National Performance Framework sets out how we report on our plans for delivery and is set out below:

- **Framework agreement with Scottish Government:** defines the key roles and responsibilities that support our relationship with Scottish Government.
- **Strategic plan:** Outlines the priority areas of work for a three-year period.
- **Programme of Work:** sets out how we will deliver the strategic plan.
- **Business plan:** details how we will use our resources each year to achieve the Programme of Work.

Our annual business plan for 2024/25 saw a number of significant pieces of work conclude and new areas of work begin, all guided by stakeholder and public engagement. The progression and completion of the outputs contributed to the annual business plan, strategic outcomes and Scottish Government National Performance Framework outcomes.

The Scottish Government's National Performance Framework sets out the high-level national outcomes to make Scotland a better place to live and a more prosperous and successful country.



## We contribute to

The outcomes set out on page 10 contribute to the following Scottish Government national performance framework outcomes and the United Nations sustainable development goals.

Scottish Government national performance framework outcomes:



## United Nations sustainable development goals:



**11** SUSTAINABLE CITIES  
AND COMMUNITIES



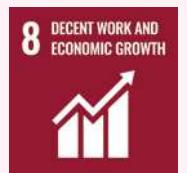
**10** REDUCED  
INEQUALITIES



**13** CLIMATE  
ACTION



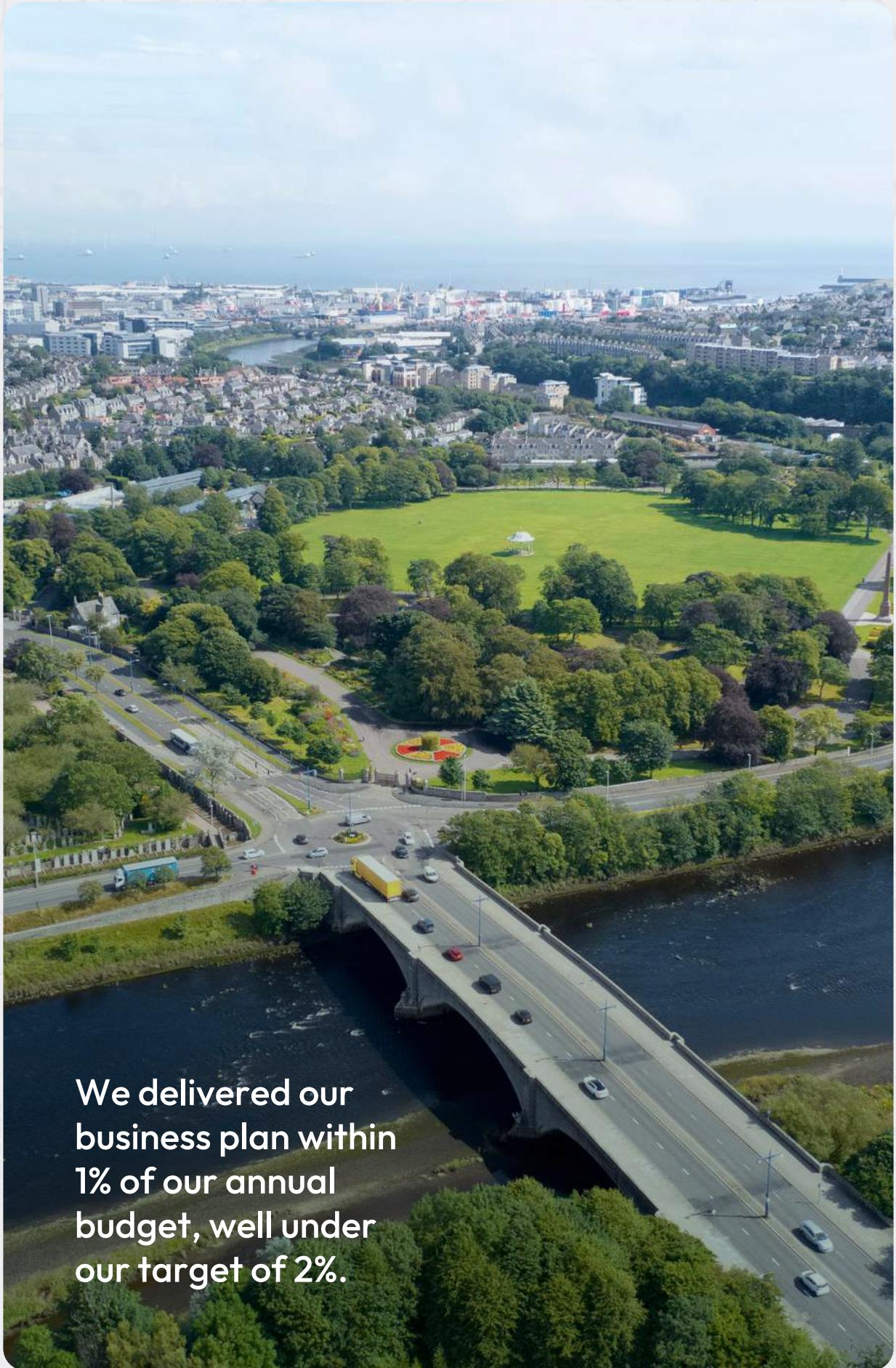
**15** LIFE  
ON LAND



**8** DECENT WORK AND  
ECONOMIC GROWTH

- Sustainable cities and communities
- Reduced inequalities
- Climate action
- Life on land
- Decent work and economic growth

This year has been one of proactive work, responding to the changing external environment, and progress of the Scottish Government's Land Reform Bill. Despite the ever-changing landscape, the Commission has remained agile in its approach. Regular management and organisational meetings have allowed us to review our priorities and capacity, making necessary adjustments to timelines and work planning to ensure successful delivery of key outputs aligned with our business and strategic plan. As a result, we accomplished 94% (82% 2023/24) of our planned outputs outlined in our annual business plan. We delivered our business plan within 1% (5.39% 2023/24) of our annual budget, well under our target of 2% (2% 2023/24).



**We delivered our  
business plan within  
1% of our annual  
budget, well under  
our target of 2%.**

## Key issues and the risks we face

This year the key risks we face centred on our capacity to respond to an evolving external environment, specifically the implications for the Commission of the land reform bill and continued public finance constraints, and transition planning for changes in board membership.

The Land Reform Bill will create new obligations for the Commission, though these will not be certain until the parliamentary process is complete. The bill was introduced at the financial year-end. The bill also creates changes in the dynamics of stakeholder relationships, as stakeholders focus on the legislative changes.

The Commission has taken an open and active approach through the year in providing advice on the bill as drafted to government, parliament and stakeholders. Our advice has proposed ways to strengthen and simplify the bill in order to help ensure it meets Ministers objectives.

We have also provided government with initial information on the estimated resource implications of new functions in the bill, though this will need to remain under careful review as the bill progresses and the expectations on the Commission for future years are firmed up.

In 2024/25 further planned changes in board membership created risks in relation to continuity of governance and stakeholder relationships. These were managed through an active programme of internal board/staff engagement, external engagement and board induction.

We consider the following issues to have the greatest influence on the way we work over the next year. They were identified as having a medium risk level at the end of 2024/25.



Key risk	Description	Mitigation
Increased obligations from the Land Reform Bill	The introduction of the new Land Reform Bill may place additional statutory duties and expectations on the Commission without a corresponding increase in resources, potentially affecting the ability to deliver current priorities.	<ul style="list-style-type: none"> <li>- Early and regular engagement with Scottish Government on the resourcing implications of the Bill.</li> <li>- Scenario planning to prioritise statutory duties and adjust the programme of work accordingly.</li> <li>- Strengthen internal planning to ensure agility in adapting delivery plans.</li> </ul>
Public finance constraints	Ongoing fiscal pressures may restrict the Commission's core budget, limiting the ability to deliver planned work and to respond flexibly to emerging national priorities.	<ul style="list-style-type: none"> <li>- Alignment of business planning with available funding, ensuring clear prioritisation of statutory and high-impact work.</li> <li>- Maintain strategic partnerships to extend impact through collaboration.</li> <li>- Continue to seek efficiencies in delivery and explore external funding opportunities where appropriate.</li> </ul>
Emerging policy issues lead to reactive working	A fast-changing external policy environment risks driving reactive rather than strategic activity, impacting the effectiveness of policy advice and stakeholder relationships.	<ul style="list-style-type: none"> <li>- Maintain a forward work programme that allows for flexibility in response to new issues.</li> <li>- Focus on horizon scanning and stakeholder relationships to anticipate policy shifts.</li> <li>- Ensure internal capacity and governance processes support timely, strategic decision-making.</li> </ul>

The Commission has mitigated these risks through the risk management framework, budget management, relationship management and horizon scanning as well as our organisational development programme and keeps the risks under active review. A new risk added to the register in 2024/25 focussed on the upcoming changes to our Board appointments and the potential hiatus in strategic direction that could arise should appointments be delayed or not be made. To mitigate the risk, we engaged early with our sponsor team so that the Public Appointments Team had all the necessary information to progress the recruitment timeline.

Further detail on our risk management in 2024/25 can be found in the Performance analysis (page 18) and the Governance statement (page 48).



## Performance analysis

The performance analysis reviews the work of the Commission in 2024/25, including our delivery, performance and our financial position at the end of the year.

### What we have achieved

Our annual business plan sets out for each financial year the way in which the Commission will deploy its resources against priorities. This was kept under close review as the Land Reform Bill was introduced.

Our business plan for 2024/25 focussed on delivering the commitments of our 2023-26 strategic plan. The plan, sets out our intended workstreams, setting out the focus and outputs for the year.

We delivered our statutory obligation to support the Tenant Farming Commissioner's functions and the relevant Ministerial commitments.

Delivery of our business plan is monitored and reported throughout the year in our quarterly progress reports to the Board including performance against our agreed Key Performance Indicators (KPIs). The workstreams detail each area in turn and show how actions in the business plan support the strategic plan's long-term outcomes.

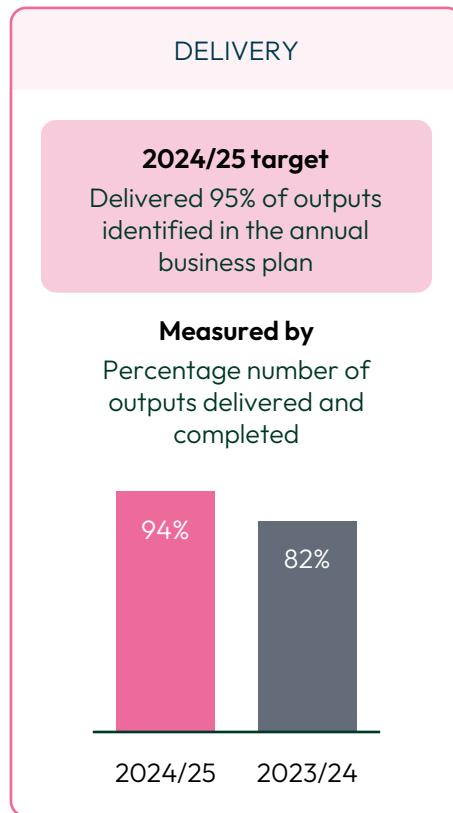
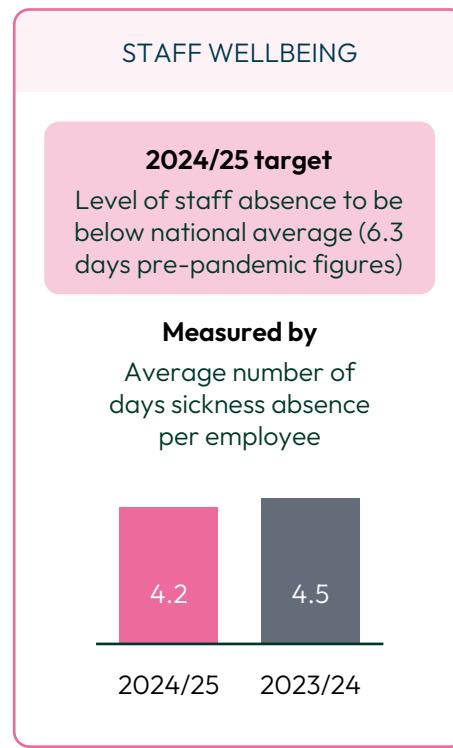
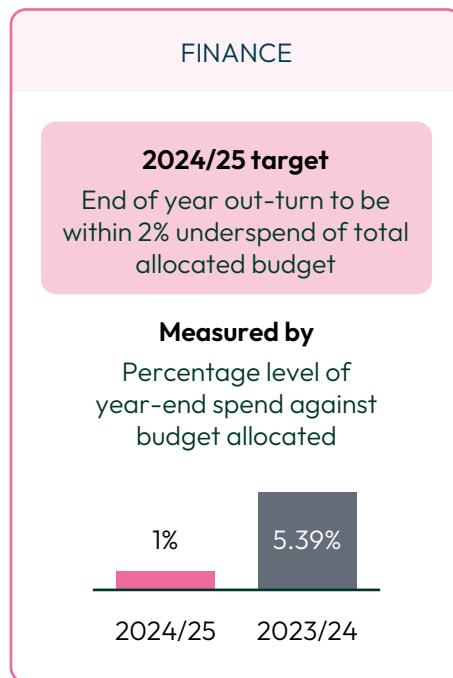
The majority of KPIs have been achieved (see table on page 19). 94% of our planned outputs have been delivered, narrowly missing our target of 95%. This reflects the strategic decision for the Commission to reprioritise some work in order to respond to advice required on the Land Reform Bill.

The Commission has robust financial management controls, including budget profiling and monitoring to ensure underspend or overspend is identified as early as possible so it can be addressed. The Commission continues to make good progress in managing its spend to deliver across its key areas of work (see highlights on page 28). This year we achieved an end of year out-turn with a 1% underspend of our total budget, against a target of 2%. Medium term financial planning was considered in the development of the annual business plan.

There are a number of risks and uncertainties facing the Commission in achieving its KPIs, that are closely monitored and managed through the risk management framework and reviewed by the Audit and Risk Committee and our Board (see Governance statement – Risk and control framework on page 53).



## Key performance indicators



NOTE: charts indicate year on year difference and are not comparable to one another.

## Key performance indicators



### DELIVERY

#### 2024/25 target

Project evaluations identify impact and change in approach by stakeholders as a direct result of the Commission's work

#### Measured by

Project evaluation surveys identify over 60% of respondents as acting on what they have learnt through event/engagement or able to identify a positive impact arising as a result of our work.

#### 2024/25 Achievement

**95%** of respondents to the survey from our national conference felt it improved their understanding of the opportunities for inclusive land ownership

**77%** of respondents to the survey from our national conference said they would make changes to their professional practice as a result of attending

#### 2023/24 Achievement

**63%** of respondents to our virtual public meetings, felt they increased their understanding of land reform

### COMMUNICATIONS

#### 2024/25 target

Increased profile of the Commission

Increase media coverage by 5%

**321**

+1% from previous year

Increase social media followers by 48%

**1,775**

-26% from previous year

Increase newsletter subscription by 10%

**2,244**

+11% from previous year

Throughout 2024/25 we have published reports and proposals on major areas of work; advice to inform the forthcoming Land Reform Bill, significant work to support Ministers' ambition that investment in natural capital should benefit local communities, and a wide range of advice to landowners, managers and communities to support the practical implementation of Scotland's Land Rights and Responsibilities Statement. Here are some of our highlights from year.

## **Advising on reforms to law, policy and practice**

We gave evidence to parliament on the Scottish Government's Land Reform Bill and published further advice on ways to strengthen and simplify the Bill, to help meet government's objectives.

We published research on international experience in natural resource governance, to inform ways of ensuring public and community value in management and investment in natural capital. We also published a progress update on the re-use of vacant and derelict land, showing significant progress but key challenges to maintaining momentum.

We published a proposal for a step-change in the role of public bodies to deliver a land supply for rural housing, backed by new commissioned research. As well as providing advice on housing land to Scottish Government, we are using this work to engage with public bodies and others directly on opportunities for delivery.





We established an advisory Reference Group to support Scottish Government's review of Community Rights to Buy and we continued to collaborate with Crown Estate Scotland to develop ways of using public land ownership to enable community acquisition in a fast-moving land market.

We continued to publish annual reporting on the rural land market, providing analysis on both the insights into market trends and the data on land transactions.

This year, the Commission also began work with the Scottish Government to explore how tax can support land reform and climate goals, in line with the Scottish Government's Tax Strategy. Phase one of this work focused on understanding the potential role of tax, including stakeholder engagement, a review of international examples, and detailed consideration of a possible carbon land tax on degraded peatland. The findings highlighted the need for a coordinated policy approach, clear definitions, and a deeper understanding of how tax interacts with other regulatory and funding mechanisms. In 2025/26, the Commission will lead Phase two of the programme—developing practical reform options, commissioning new research, and providing strategic advice to Ministers on a route map for using tax to help deliver land use change.

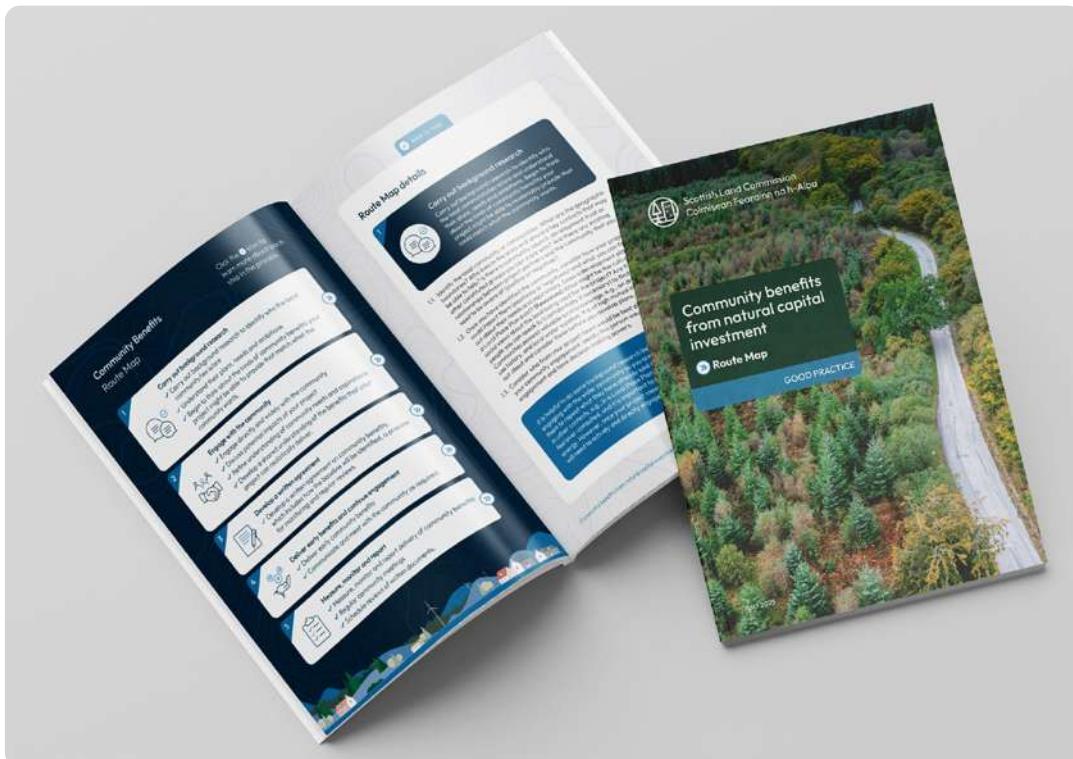
## Supporting practical implementations of Scotland's Land Rights and Responsibilities Statement

We continued to work with landowners, managers and communities to support practical implementation of the principles in Scotland's Land Rights and Responsibilities Statement, working with 89 cases and enquiries through the year.

This work supports good outcomes in community engagement, transparency and opportunities for collaboration, in some cases helping parties resolve a difficult situation.

This year we have also put particular emphasis on supporting professional advisers, providing advice and training directly to land agent firms and providing a series of webinars and information.

We have also worked this year to embed the expectations for community benefit from land use change set out in our guidance published last year. This guidance was endorsed this year in the Scottish Government's Nature Markets Framework and we have used it to inform the UK BSI standards work on natural capital markets. We helped develop a funding package to put in place a network of advisory support on community benefit from natural capital investment, with the network launched early in the new financial year.



## Communications

In 2024-25, the Scottish Land Commission continued to strengthen its communications, with a focus on transparency, broadening public understanding of land reform, and engaging key audiences across Scotland. A key highlight was the successful delivery of our national conference, which brought together leaders from across the sector to share insights and discuss the possibilities unlocked by an inclusive approach to landownership. We also had a strong presence at the Royal Highland Show, partnering with Registers of Scotland to jointly host a stand and share costs, allowing us to reach a wide rural audience.

Throughout the year, we supported the progress of the Land Reform Bill in our communications providing clear and constructive advice on how the proposals could be simplified and strengthened to enable the successful implementation of the bill. We also expanded our public engagement through the Land Links webinar series, opening up access to a broader audience and helping to increase public understanding of land related issues.

As part of our wider effort to engage audiences who may not yet be actively involved in land reform our team contributed to a number of podcasts, discussing key topics including the rural housing shortage, the Natural Capital Market Framework, and responsible investment in nature restoration. In addition, we published a series of opinion pieces covering subjects such as land tax, housing, and town centre living, helping to inform public debate and share evidence-based perspectives on the opportunities and challenges facing Scotland's land. We also refined our key performance indicators to more accurately track engagement across our social media channels. These new KPIs are tailored to each platform, considering historical trends and current industry standards, allowing us to better assess reach, relevance and audience interaction.



Some KPIs have been updated to provide a more meaningful measure of communications activity, so direct comparison with previous years is not possible.

## Tenant Farming Commissioner

A successful and resilient tenant farming sector depends on constructive relationships between tenants and landlords, supported by professional and fair conduct from intermediaries acting for both parties. These relationships must be grounded in mutual respect, shared values, and a commitment to fairness and reasonableness.

Over the past year, the Tenant Farming Commissioner (TFC) has continued to promote and support these principles, working across the sector to encourage good practice, provide clear guidance, and help resolve issues where they arise. To date, seven codes of practice have been published to support constructive relationships in the tenant farming sector. These codes are designed to guide the behaviour and processes involved in interactions and negotiations between tenants and landlords, including the role of agents and intermediaries acting on their behalf.

Over the past year, the Tenant Farming Commissioner (TFC) has continued to provide advice and support to both landlords and tenants on how to implement the codes effectively in practice.

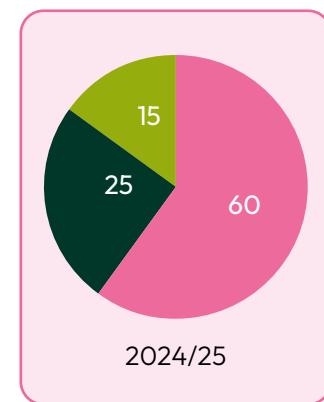
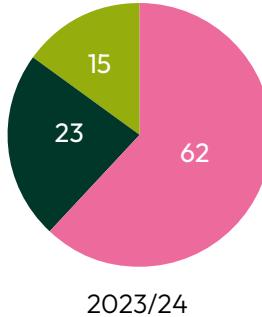
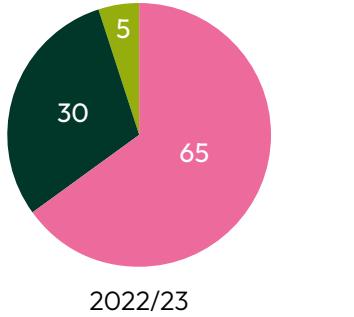
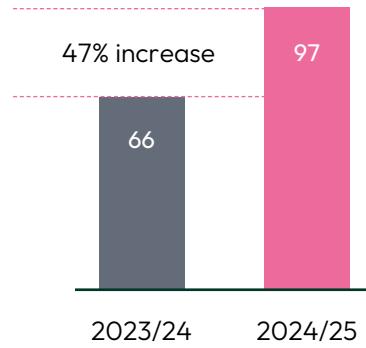
This year saw a transition in leadership as Bob McIntosh completed his term as Tenant Farming Commissioner, having made a lasting impact in strengthening sector relationships and promoting good practice. Rob Black was appointed in December 2024 and has quickly built on this foundation, bringing a collaborative, practical approach to supporting tenants, landlords, and agents.

Key activities delivered during the year include:

- **Tenant Farming Mediation Scheme:** The Commission renewed and promoted the Mediation Scheme, offering up to £1,000 towards mediation costs for tenants and landlords. This has provided a practical and accessible route to resolving disputes without the need for litigation.
- **Review of Agents Report:** The TFC published a research report on the conduct of agents and intermediaries, highlighting encouraging progress across the sector. The findings show growing awareness and adoption of TFC guidance, with agents increasingly playing a positive role in fostering constructive landlord-tenant relationships.
- **Policy engagement:** The TFC worked closely with the Tenant Farming Advisory Forum (TFAF) to feed sector feedback into the Scottish Government's development of the Land Reform Bill.
- **Stakeholder communications:** Through newsletters and blogs, the TFC shared updates and insights on emerging issues — including the importance of better sector data and the most common concerns raised by stakeholders — helping to raise awareness and build capacity across the sector.

## Casework

The TFC provides information to tenants and landlords regarding the codes of practice. During 2024/25 the TFC received 97 cases, which is a 47% increase on the previous year. This has primarily been driven by increased promotion of our helpline and services and involvement in several CPD sessions with land agents.

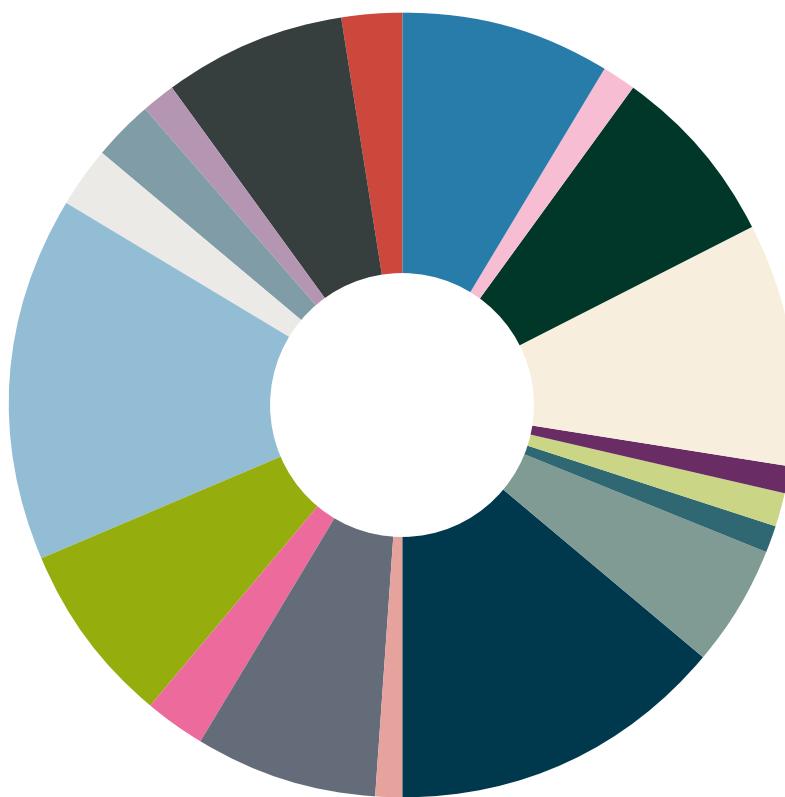


Most contacts have been made by tenant farmers and their representatives (60%), with enquiries from landlords and their representatives accounting for a quarter of enquiries (25%) and other professionals representing 15% of enquiries.

- Tenants and tenants' representatives
- Landlords and landlords' representatives
- Other

## Type of enquiry 2024/25

A wide range of enquires has been received by the TFC over the last year with a majority seeking advice on rent reviews, relinquishment and tenancy or lease terms. As in previous years, enquiries have been received from across Scotland, with Aberdeenshire and Perth and Kinross having the greatest number of new contacts.

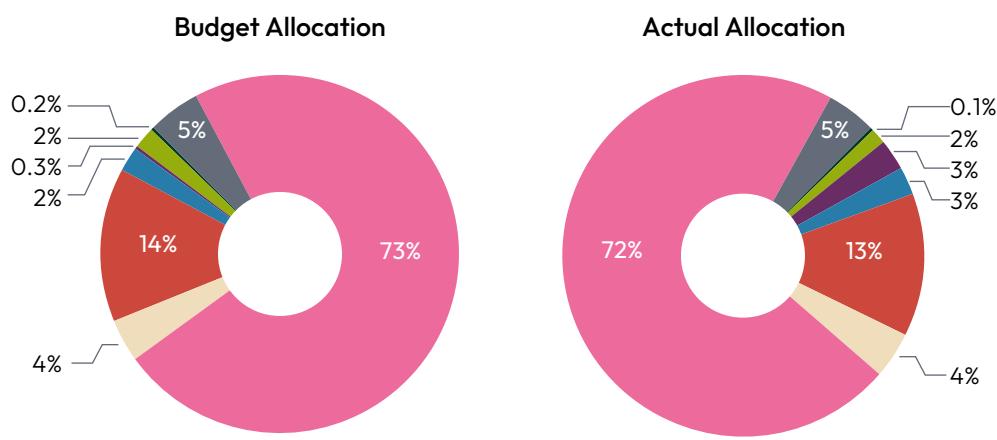


Assignation/Succession	7	Repairs	6
Breach of code	1	Resumption	2
End of tenancy	6	Sporting	6
General legislation	8	Tenancy/Lease terms	12
Land policy	1	Tenant's improvements	2
Late payment of rent	1	Forestry	2
Limited partnership	1	Housing	1
New/Renewing tenancy	4	Other	6
Relinquishment	11	Waygo	2
Rent review	1		

## Financial position

In 2024/25, the Scottish Government allocated the Scottish Land Commission a budget of £1.615 million. The Commission drew down its full Grant-in-Aid allocation and generated an additional £51,000 in income through externally funded, programmed work.

Our final out-turn shows a year-end surplus of £21,000 against Grant-in-Aid and Other Income. This reflects strong financial management and the Commission's effective use of external funding to support delivery of its strategic priorities.



2024/25	Budget allocation	Actual allocation
Commissioners' costs	78,500	76,645
Staffing costs	1,173,105	1,177,530
Communications and events	62,362	67,078
Corporate Services	225,400	212,455
Reforming land rights	35,000	41,980
Embedding responsible land ownership and use	5,000	42,720
Reforming land markets	31,963	25,421
Tenant Farming Commissioner	3,000	1,200
	<b>1,614,330</b>	<b>1,645,029</b>

In programming the budget, we deliberately maintained some flexibility to accommodate changing priorities and resource adjustments. By the mid-year review, our planned expenditure was on track and additional programme spend was made available due to efficiencies in communications and corporate services. Our planned staffing costs remained within expected limits despite staff turnover, due in part to the stability provided from an agreed two-year pay award.

## Financial overview

In 2024/25, the Scottish Land Commission received a total budget allocation of £1.615 million, along with an additional £51,000 to support partnership work aligned with our strategic objectives. This included two projects: one forming part of a longer-term collaboration with the Cairngorms National Park Authority, and another focused on delivering community benefits.

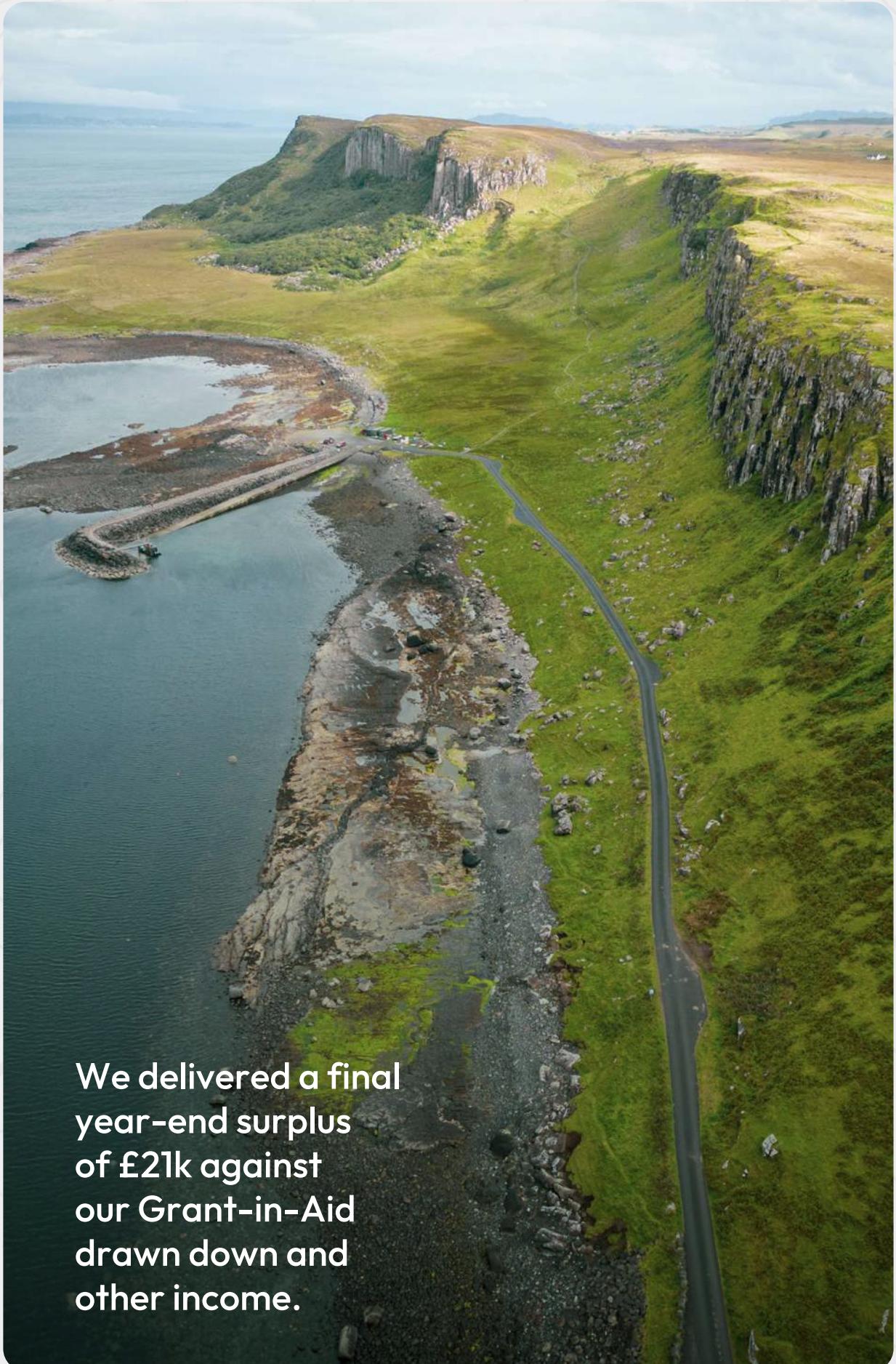
Our final out-turn shows a year-end surplus of £21,000 against Grant-in-Aid and Other Income.

This position reflects effective financial planning and the Commission's continued commitment to delivering best value through collaboration and responsible use of public funds.

Summary of out-turn	2024/25 £000	2023/24 £000	2022/23 £000
DEL Budget	1,615	1,559	1,550
Total operating expenditure	(1,645)	(1,475)	(1,508)
Surplus/(deficit) against budget	(30)	84	42
Grant-in-Aid (GIA) draw down	1,615	1,535	1,550
Other income	51	-	-
Surplus/(deficit) against GIA draw down	21	60	(42)

Other Income is represented by the below.

- FIRNS partnership - £32,220
- CNPA partnership - £9,236
- Scottish Government Secondment - £6,134
- Scottish Government refund - £3,000



**We delivered a final  
year-end surplus  
of £21k against  
our Grant-in-Aid  
drawn down and  
other income.**

# Our organisation

Now in our eighth year, the Scottish Land Commission continues to grow and adapt as we deliver our third Strategic Plan. In a changing policy and financial environment, we remain focused on being a responsive, forward-thinking organisation.

## Organisational development

### Investing in governance and leadership



This year marked the successful completion of our planned Board succession, with the appointment of two new Land Commissioners and a new Tenant Farming Commissioner. Ongoing induction and development sessions have supported new members to contribute effectively, with the full Board engaging in regular training to strengthen governance and leadership.

### Building skills and strengthening team culture



Staff development remained a key priority, with a tailored training programme delivered across the year. Topics included cyber security, contract and project management, line management, and role-specific courses – all shaped by individual and organisational needs.

We also enhanced internal communications and team culture. Our biannual staff survey, now improved through staff input, provided a strong platform for feedback and action. Outcomes were explored through our staff engagement forum, ensuring transparency and shared ownership of improvements.

### Bringing teams together



Recognising the importance of collaboration, we placed a stronger emphasis on board and staff interaction. All-staff and board workshops were held twice during the year, alongside more informal opportunities for engagement. Our monthly team meetings in Inverness were refreshed with a rotating chair and a staff-led approach to shaping agendas – helping to embed ownership and inclusion across the team.

### Enhancing project delivery



To support delivery, we introduced a new ‘project initiation document’ process. This ensures that each new project is assessed for its objectives, resources, risks, and delivery plan before approval, strengthening our approach to programme and risk management.

## Managing change with control



In line with Scottish Government requirements, we implemented additional in-year spend controls as part of wider public sector budget management. This required careful planning and responsiveness to ensure continued delivery within revised financial parameters.

## Risk profile: Summary 2024/25

The Commission's risk profile has changed through the year in response to changes in external environment and within the organisation. Changes primarily reflected the evolving policy and stakeholder context of the Scottish Government's Land Reform Bill, changes in board membership and financial and resource context.

Risks are identified, monitored and managed through our risk management framework. Strategic risks are monitored by the Audit and Risk Committee, which reviews the strategic risk register at each meeting and undertakes a 'risk interrogation' of a specific risk at each meeting. The board undertakes an annual review of strategic risks and maintains oversight of the strategic risk register via quarterly reports.

This year the strategic risk register continued to flag key risks including delivery, reputation, compliance and staffing risks.

- The risk that changes in board membership could be delayed and/or in result in disruption to governance, delivery or stakeholder relationships was closely monitored and managed. Mitigating actions included close engagement with sponsor team, a planned induction and transition arrangements for the Tenant Farming Commissioner.
- The risk that the Land Reform Bill impacts on relationships and engagement with stakeholders was identified as a high risk through the year and closely managed. Mitigating actions included clear and regular communications and direct engagement with stakeholders.
- A new risk was added to recognise the potential that the Land Reform Bill creates increased obligations for the Commission without sufficient resources, impacting on delivery.

The Commission retained a focus on cyber security risks, reporting regularly to board and achieving continued Cyber Essentials Plus accreditation.

## Planning ahead

In planning ahead for the next financial year, we have set out a refreshed delivery focus in our new Programme of Work, published on 1 April 2025. Alongside this, we are giving greater consideration to our medium-term financial position. Rising costs and constrained public finances mean we are taking a more strategic approach to financial planning, including scenario testing, assessing priorities against available resources, and exploring opportunities for efficiency and collaboration. This will help ensure that our work programme remains deliverable and sustainable over the coming years. We have made savings and adjustments as vacancies have arisen, with one fixed term post leaving during the year not replaced. We have also continued to take opportunities to collaborate with others to maximise the value of spend and resource.

During 2025/26 we will keep the resource implications of the Land Reform Bill under close scrutiny. As the bill completes the parliamentary process there will be greater certainty on the additional functions the Commission will be required to take on and we will engage closely with our sponsor team on the additional resource implications. We also expect the secondary stages of the bill and preparation for implementation to require significant work by the Commission. Our 2025/26 business planning anticipates some flexibility required to respond to this and we will be engaging with Scottish Government on the budget implications for future years.

In 2025/26 we will deliver on our Programme of Work through a focus on the following priorities:

People	Power	Prosperity
	Providing advice and evidence to support development and implementation of the Land Reform Bill	
	Engaging on what the outcome of a 'land reformed Scotland' looks like and the reforms that would achieve it	
More diverse land ownership and governance including community land ownership	Public land leadership: strengthening the role of public land ownership in reforms	A route map for tax reforms supporting land reform and net zero outcomes
	Supporting practical implementation of Scotland's Land Rights & Responsibilities Statement	
	Supporting good relations between agricultural landlords and tenants	
	Sound corporate governance and organisational development	

## Sustainable, social and environmental review

In response to the Scottish Government's climate emergency declaration and ambitious public sector carbon targets, we remain focused on reducing our environmental impact. Our Climate Action Plan outlines our route to net zero emissions by 2025 and zero direct emissions by 2030.

In 2024, the Commission's total emissions were 34 tonnes. This compares to 30 tonnes in 2023 and 20 tonnes in 2022. While the year-on-year change reflects an overall increase in in-person activity, we continue to prioritise emissions reduction through hybrid working, digital meetings, and sustainable travel policies.

Our internal policies on homeworking and travel were reviewed again this year to ensure lasting behavioural change and long-term carbon savings. We are also actively reviewing our delivery progress against our route map to net zero.



## Progress on climate action

In response to the Scottish Government's climate emergency declaration and ambitious public sector carbon targets, we remain focused on reducing our environmental impact. Our Climate Action Plan outlines our route to net zero emissions as defined by Scottish Government by 2025 and zero direct emissions by 2030.

In 2024, the Commission's total emissions were 34 tonnes. This compares to 30 tonnes in 2023 and 20 tonnes in 2022. While the year-on-year change reflects an overall increase in in-person activity, we continue to prioritise emissions reduction through hybrid working, digital meetings, and sustainable travel policies. Our internal policies on homeworking and travel were reviewed again this year to ensure lasting behavioural change and long-term carbon savings. We are also actively reviewing our delivery progress against our route map to net zero.

## Supporting communities and charities

We recognise the value of staff contributing to the wider community. We continue to support colleagues who take part in community or charitable activities. Staff can contribute through the 'Give As You Earn' scheme, donating a portion of their salary to charities of their choice.

## Best value

The Commission's Board provides the vision and leadership to ensure that it is satisfied that the organisation is making the best use of public money. We are committed to delivering best value through clear governance and accountability, effective performance management, partnership and collaborative working, maximising efficiencies and building sustainability into how we operate.

The Commission is committed to achieving its efficiency savings and has continued to realise cost savings through a review of our existing IT service provision, HR suppliers and our accounting software, enabling us to deliver more efficient and accessible business planning. A comprehensive review of our accountancy support has ensured the Commission is getting best value from its suppliers.

In delivering best value we are committed to fairness and equality of opportunity and have policies and procedures in place to ensure this is achieved. We also fully recognise our legal responsibilities, particularly in respect of race relations, age, sex and disability discrimination.

The Commission is committed to the highest standards of ethical conduct and integrity and to the prevention of bribery and corruption. We have an anti-fraud policy in place and there been no reported incidents of corruption or fraud.

## Accessibility

Accessibility remains a key priority for the Scottish Land Commission as we continue to improve how our work is accessed, understood, and used by the public. In 2024/25, we have taken further steps to make our communications more inclusive and accessible. We have:

- Simplified the language we use across our communications, adopting plain English explanations to improve clarity;
- Introduced one-page summaries for longer or more technical reports, making key messages more accessible to a wider audience;
- Standardised document styling by using sentence case for headings and ensuring all text is set at a minimum of 12 point for improved readability.

To support consistency in our internal communications, we have developed a suite of document templates that meet accessibility standards, helping staff produce accessible content by default.

We continue to adhere to the Web Content Accessibility Guidelines (WCAG) for all published materials, and our PDF documents are created with these standards in mind. Work is currently underway to address remaining accessibility issues on our website, with improvements informed by insights from Accessibility Cloud and support from the Government Digital Service.

We also took part in several accessibility training webinars hosted by the Scottish Government this year, further strengthening our organisational understanding of inclusive design and digital accessibility.



Hamish Trench  
Chief Executive and Accountable Officer  
27 October 2025

# Accountability Report

# Accountability report

This report contains key statements and reports that enable the Scottish Land Commission to meet accountability requirements and demonstrate compliance with good corporate governance.

## Corporate governance report

### Directors' report

### Board of Commissioners

Full details of the Commissioners' Register of Interest can be found on our website: [www.landcommission.gov.scot](http://www.landcommission.gov.scot)



#### Michael Russell (Chair)

Michael Russell, served as a Scottish Government Minister and Member of the Scottish Parliament at various times between 1999 and 2021. He has had a long-term involvement with land reform having been Environment Minister from 2007-2009, a member of the Scottish Parliament Committee which scrutinised the Land Reform Bill

in 2015 and an MSP for the South of Scotland Region for two terms before being elected in 2011 to serve the constituency of Argyll and Bute where he has lived since 1992.

He retired from representational politics in 2021 but remained SNP President until 2023. He is the author of seven books and has worked as a columnist and commentator as well as a television producer and director.

He was the founder of the Celtic Media Festival, now in its 45th year, was part time Professor in Scottish Culture and Governance at the University of Glasgow (where he is now an Honorary Professor in the College of Arts & Humanities) and is the trustee of several charities.



**Rob Black**  
**(Tenant Farming Commissioner)**  
from 19 December 2024

Rob Black runs North West Rural Consulting, offering tailored specialist support to rural

businesses. Previous to this, Rob was a Development Manager for the Isle of Luing Community Trust, where he oversaw projects including the reactivation of Cullipool Slate Quarry, community housing, and net-zero carbon objectives to support economic growth and tackle rural depopulation.

Rob also worked as an Agricultural Consultant with SAC Consulting, providing technical advice on crofting agriculture, regulatory compliance, and funding applications.



**Dr Bob McIntosh CBE**  
**(Tenant Farming Commissioner)**  
until 18 December 2024

Bob is a retired public servant with extensive experience in public policy, in particular in land management and forestry. Bob was the Scottish Government Director for Environment and Forestry between 2012 and 2015, and before that served as the Director of Forestry Commission Scotland and in many other roles in the Forestry Commission.

He was a partner in a 650-acre hill farm for 15 years.

### **Professor Deb Roberts**

Professor Deb Roberts is Deputy Chief Executive and Director of Science at the James Hutton Institute. Deb trained as an agricultural economist and, prior to moving into her current position, her research focussed on understanding how agricultural and environmental policies affect economic development and social wellbeing in rural areas.



She holds an Honorary Chair in Real Estate at the University of Aberdeen.

### **Dr Lucy Beattie (from 19 December 2024)**

Dr Lucy Beattie started out working in agriculture and then began teaching and researching in the field of agricultural education. Having completed her PhD studies at the University of the West of Scotland. As a former Teaching Fellow in Science Communication at University of Edinburgh she is committed to understanding perspectives that integrating research with public engagement with science. Lucy is currently employed as researcher at The James Hutton Institute and manages a family farm



enterprise in the Northwest Highlands. Lucy has managed training programs for the Scottish Crofting Federation and worked as a consultant and community development worker with a range of organisations on education and rural development.



**Dr Calum MacLeod** (from 19  
December 2024)

Dr Calum MacLeod is Senior Policy and Public Affairs Officer for the Mental Health Foundation in Scotland and a freelance sustainable development consultant.

In 2010 he led post-legislative scrutiny of the Land Reform (Scotland) Act 2003 on behalf of the Scottish Parliament. Formerly Policy Director of Community Land Scotland, Calum has a PhD in public policy implementation and has taught sustainable development and public policy courses at several Scottish Universities.

He is a Board Member of MG ALBA (Gaelic Media Service) and was previously a Board Member of the Harris Tweed Authority, championing sustainable, community-focused development.



**Dr Craig Mackenzie**

Dr. Craig Mackenzie, a Senior Lecturer at the University of Edinburgh Business School, brings over 20 years of experience in investment management, combining financial and sustainable investment roles. In his most recent position, he

led strategic asset allocation and developed climate solutions and natural capital investment funds. Over his career, Craig has shaped good practice standards on corporate environmental and social responsibility, serving on advisory boards for the Global Reporting Initiative, the Principles for Responsible Investment (PRI) and FTSE. As an academic, he founded the Centre for Business and Climate Change (now BCCaS) at the University of Edinburgh and helped launch carbon management and climate finance MSc programs. He has a PhD in behavioural finance and has published on sustainability and corporate responsibility.

**Lorne MacLeod** (until 18 December 2024)

Lorne was a founding director, and latterly Chair, of Community Land Scotland, and has been a director of the community land buyout groups in Eriskay, South Uist and Benbecula, and the Isle of Gigha.

He was Highlands and Islands Enterprise's first Director of Strengthening Communities.



He is a chartered accountant, and director of a retail and distribution business in the Isle of Skye.

**Dr Sally Reynolds** (until 18 December 2024)

Sally is an Agricultural Consultant (with a PhD in mathematical ecology); she recently worked, for eight years, within the Community Land Sector as Development Manager with Carloway Estate Trust (Urras Oighreachd Chàrlabhaigh). An active crofter, she contributes to a number of activities which benefit the community.



She currently works, in a Business Development role, with Stornoway Port.

## Management Team



### **Hamish Trench – Chief Executive and Accountable Officer**

Responsible for the strategic leadership and operational management of the organisation and supporting Commissioners in fulfilling their functions.



### **Nikki Nagler – Head of Communications and Corporate Services**

Responsible for leading the Commission's communications and corporate services, including corporate governance, finance, HR and IT.



### **Emma Cooper – Head of Land Rights and Responsibilities**

Responsible for leading the programme of work supporting the practical implementation of Scottish Government's Land Rights and Responsibilities Statement (LRRS), responsible land ownership and use.

## Pensions

Scottish Land Commission staff members are eligible to be members of the Principal Civil Service Pension Scheme. Details of the scheme and details of the pension entitlements of the Scottish Land Commission's senior managers are given in the Remuneration and Staff Report (page 52) and note 2 (page 52) to these accounts.

## Freedom of Information Requests

The Scottish Land Commission received 15 Freedom of Information requests during the year 2024/25. Details of these can be reviewed on the Scottish Information Commissioner's website: [stats.itspublicknowledge.info](https://stats.itspublicknowledge.info)

## Data protection

The Commission has had one recorded or reported instance of data loss or breaches during the year, this compares with no losses in 2023/24.

## Payment Practice Code

In line with Scottish Government policy, the Scottish Land Commission requires that all suppliers' invoices not in dispute are paid within 10 working days of receipt. The Scottish Land Commission aims to pay 100% of invoices, including disputed invoices once the dispute has been settled, on time in these terms. During the year ended 31 March 2025, the Scottish Land Commission paid 96% of its invoices within these terms.

## Non-audit fees

The Auditor General for Scotland has appointed Deloitte as the external auditor. Details of the audit fee for the year to 31 March 2025 are disclosed in note 3 (page 86) to the accounts. Deloitte were not engaged or paid for any non-audit work during the year.



**During the year  
ended 31 March 2025,  
the Scottish Land  
Commission paid 96%  
of invoices within 10  
working days of receipt.**

## Statement of Accountable Officer's responsibilities

In accordance with section 19(4) of the Public Finance and Accountability (Scotland) Act 2000 and section 19 of the Land Reform (Scotland) Act 2016, Scottish Ministers have directed the Scottish Land Commission to prepare a statement of accounts for each financial year in the form and on the basis set out in the Accounts Direction issued by the Scottish Ministers.

The accounts are prepared on an accruals basis and must give a true and fair view of the Scottish Land Commission's state of affairs at the period end and of its operating costs, recognised gains and losses and cash flows for the financial period.

**In preparing the accounts, the Accountable Officer is required to:**



Observe the Accounts Direction issued by Scottish Ministers including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis



Make judgements and estimates on a reasonable basis



State whether applicable accounting standards as set out in the Government Financial Reporting Manual have been followed, and disclose and explain any material departures in the accounts



Prepare the accounts on a going concern basis

The Permanent Secretary and Principal Accountable Officer of the Scottish Government has appointed the Chief Executive of the Scottish Land Commission as Accountable Officer.

## **Statement by Accountable Officer**

As Accountable Officer, I am responsible for the regularity and propriety of the public finances for which I am answerable, for keeping proper records and for safeguarding the Scottish Land Commission's assets, as set out in the Memorandum to Accountable Officers for Parts of the Scottish Administration issued by Scottish Ministers.

## **Disclosure of information to the auditors**

As Accountable Officer, as far as I am aware, there is no relevant audit information of which the Scottish Land Commission's auditor is unaware. I have taken all reasonable steps to make myself aware of any relevant audit information and to establish that the Scottish Land Commission's auditor is aware of the information.

## **Accountable Officer confirmation on the Annual Report and Accounts**

As Accountable Officer I confirm that the annual report and accounts as a whole is fair, balanced and understandable and I take personal responsibility for the annual report and accounts and the judgements required for determining that it is fair, balanced and understandable.

# Governance statement

## Background

The Governance Statement records the stewardship of the Scottish Land Commission and supplements the annual accounts. This statement also draws together statements and evidence on governance, risk management and control, to provide a coherent and consistent reporting mechanism.

## Scope of responsibility

As Accountable Officer, I have responsibility for maintaining a sound system of internal control that supports the achievement of the organisation's policies, aims and objectives, set by Scottish Ministers, whilst safeguarding the public funds and assets for which I am personally responsible, in accordance with the responsibilities set out in the Accountable Officer's Memorandum.

In the discharge of my personal responsibilities I ensure organisational compliance with the Scottish Public Finance Manual (SPFM). The SPFM is issued by the Scottish Ministers to provide guidance to the Scottish Government and other relevant bodies on the proper handling and reporting of public funds. It sets out the relevant statutory, parliamentary and administrative requirements, emphasises the need for economy, efficiency and effectiveness

# Governance framework

## The Board

The Chair leads the Board of Commissioners and the Chief Executive leads the executive management of the Scottish Land Commission.

The Board comprises six Commissioners: there is one Chair, four Land Commissioners and one Tenant Farming Commissioner, all of whom are appointed by Scottish Ministers.

More information on the Commissioners can be found on pages 38-42.

### Board of Commissioners during 2024/25

Commissioner	Board Position	Attendance <sup>1</sup>
Michael Russell	Chair	10/10
Dr Bob McIntosh <sup>2</sup>	Tenant Farming Commissioner	8/8
Lorne MacLeod <sup>2</sup>	Commissioner	8/8
Dr Sally Reynolds <sup>2</sup>	Commissioner	8/8
Dr Craig Mackenzie	Commissioner	10/10
Professor Deb Roberts	Commissioner	10/10
Rob Black <sup>3</sup>	Tenant Farming Commissioner	2/2
Dr Lucy Beattie <sup>3</sup>	Commissioner	2/2
Dr Calum Macleod <sup>3</sup>	Commissioner	2/2

<sup>1</sup> Attendance of Board Meetings during 2024/25

<sup>2</sup> Appointment ended on 18 December 2024 <sup>3</sup> Appointment began on 19 December 2024.

The role of the Board is to provide strategic leadership for the organisation, setting the policy direction including development of a strategic plan and programme of work to be agreed with Scottish Ministers. They also oversee the performance of the organisation and the Chief Executive is accountable to the Board for its performance.

**During the year 2024/25 the Board focussed on:**

- Overseeing delivery of the strategic plan and programme of work
- Extensive public and stakeholder engagement, including at the Commission's national conference
- Quarterly performance monitoring addressing delivery, financial, risk and governance performance
- Board member development and training.

The Board is supported by an Audit and Risk Committee to maintain oversight of internal and external audit, financial, risk and governance performance, and a Staffing and Remuneration Committee.

The Board is committed to high standards of corporate governance and believes that a sound governance structure engenders a successful organisation. The Board's standing orders can be obtained from the Commission's website: [www.landcommission.gov.scot](http://www.landcommission.gov.scot).



## Audit and Risk Committee

During 2024/25, the structure of the Audit and Risk Committee was updated, with a new Chair appointed in December 2024 following the departure of the previous postholder. To maintain the Committee's breadth of expertise and ensure continued assurance to the Board, a new co-opted member was also appointed by the Board. The Committee met four times over the course of the year.

### Audit and Risk Committee members during 2024/25

Committee member	Committee position	Attendance <sup>1</sup>
Lorne MacLeod	Chair (Commissioner) <sup>2</sup>	3/3
Dr Craig Mackenzie	Chair (Commissioner) <sup>3</sup> Member (Commissioner)	4/4
Prof Deb Roberts	Member (Commissioner)	4/4
Malcolm Mathieson	Member (Co-opted) <sup>4</sup>	1/1

<sup>1</sup> Attendance of committee meetings during 2024/25

<sup>2</sup> Appointment ended on 18 December 2024

<sup>3</sup> Member until 18 December 2024 and Chair from 19 December 2024

<sup>4</sup> Member from 1 February 2025

The external and internal auditors attend all Audit and Risk Committee meetings. They are given the opportunity to speak confidentially to the Committee members. The purpose of the Audit and Risk Committee is to monitor and review risk, control and corporate governance. It operates independently and reports to the Board.

The Audit and Risk Committee terms of reference can be obtained from the Commission's website: [www.landcommission.gov.scot](http://www.landcommission.gov.scot).

## Staffing and Remuneration Committee

A Staffing and Remuneration Committee oversees and monitors the remuneration systems put in place for the Commission, including the annual pay remits, as well as senior appointments. The staffing and remuneration committee is a committee of the Commission. The members of the Staffing and Remuneration Committee are the Board of Commissioners chaired by the Chair of the Land Commission. The Committee met two times during the 2024/25.

### Staffing and Remuneration Committee members during 2024/25

Committee member	Committee position	Attendance <sup>1</sup>
Michael Russell	Chair	3/3
Dr Bob McIntosh <sup>2</sup>	Tenant Farming Commissioner	3/3
Lorne MacLeod <sup>2</sup>	Commissioner	3/3
Dr Sally Reynolds <sup>2</sup>	Commissioner	3/3
Dr Craig Mackenzie	Commissioner	3/3
Professor Deb Roberts	Commissioner	3/3
Rob Black <sup>3</sup>	Tenant Farming Commissioner	0/0
Dr Lucy Beattie <sup>3</sup>	Commissioner	0/0
Dr Calum Macleod <sup>3</sup>	Commissioner	0/0

<sup>1</sup>Attendance of committee meetings during 2024/25

<sup>2</sup>Appointment ended on 18 December 2024

<sup>3</sup>Appointment began on 19 December 2024.

## Management Team 2024/25

- Hamish Trench (Chief Executive and Accountable Officer)
- Nikki Nagler (Head of Communications and Corporate Services)
- Emma Cooper (Head of Land Rights and Responsibilities)

More information on the Senior Management Team can be found on page 43. The Management Team meets regularly to co-ordinate operational management. The Senior Management Team is committed to high standards of corporate governance and provides the leadership, strategic oversight and the control environment required to deliver the Scottish Land Commission's key aims.

## Risk and control framework

All bodies subject to the requirements of the Scottish Public Finance Manual (SPFM) must operate a risk management strategy in accordance with relevant guidance issued by the Scottish Ministers.

The risk and control mechanism is based on an ongoing process designed to identify the principal risks to the achievement of the Scottish Land Commission's policies, aims and objectives; to evaluate the nature and extent of those risks, and to manage them efficiently, effectively and economically.

The Scottish Land Commission maintains a Strategic Risk Register which records internal and external risks and identifies the mitigating actions required to reduce the threat of these risks occurring and their impact. The Strategic Risk Register is regularly updated and reviewed as a standing item by both the Senior Management Team and the Audit and Risk Committee. Each individual risk is allocated an owner who ensures that mitigating action is carried out. The Risk Register is presented to the Board on a quarterly basis.

**The principal risks identified during the year to 31 March 2025 can be categorised under four main headings:**

#### **Delivery**

- Risk of catastrophic loss of systems resulting in the Commission being unable to operate effectively.
- Risk that the Land Reform Bill creates increased obligations without sufficient resource, affecting the Commission's ability to deliver its programme of work.
- Risk that public finance constraints limit the Commission's ability to respond to changes in national priorities, reducing agility and effectiveness.

#### **Reputational**

- Risk of disruption to governance due to changes in Board appointments or failure to recruit, leading to reduced clarity around strategic direction.
- Risk of reactive policy making and weakened relationship management due to emerging external issues.
- Risk of inconsistent messaging and lack of clear narrative linking the Commission's outputs to the wider land reform agenda.
- Risk of ineffective stakeholder engagement, including with Scottish Government, reducing the impact and influence of the Commission's work.

#### **Compliance**

- Risk of failure to meet statutory or governance requirements, potentially leading to administrative or reputational consequences.
- Risk of financial non-compliance, including failure to deliver within budget due to shifting priorities or controls, especially in-year Scottish Government measures.

#### **Staffing**

- Risk of reduced delivery capacity due to staff absence or illness affecting critical functions.
- Risk that workload pressures and competing expectations impact staff wellbeing or result in delivery delays.
- Risk of disruption due to hybrid and remote working arrangements, particularly if not fully embedded in systems and processes.

The Scottish Land Commission follows the Scottish Government policy on Information Security and has a Senior Information Risk Owner in place to manage information risk.

The risk and control processes applied within the Scottish Land Commission accord with guidance given in the SPFM and have been in place for the year ended 31 March 2025 and up to the date of the approval of the annual report and accounts.

During the year, and up to the date of signing the accounts, the following governance arrangements were in place:

- Whistle Blowing Policy
- Anti-Fraud Policy
- Updated Finance Desk Instructions.

The system of internal control will continue to be reviewed to ensure effective assurances as the organisation matures and develops.

## Best value

The Commission's Governance Framework is built on best practice principles to ensure value for money across all operations, services, and contracts. In 2024/25, we undertook several key reviews to improve efficiency and reduce external spend.

This included a full retender of our financial software and accounting services to streamline processes and enhance financial oversight. A comprehensive review of our IT provision was also completed, ensuring continued performance and cost-effectiveness from suppliers.

We also reviewed our public relations contract and made the decision to bring this work in-house, making better use of internal expertise. Looking ahead, we will review our web hosting contract in 2025/26 to ensure it continues to deliver best value.

## Conflicts of interest procedures

The Scottish Land Commission operates strict and comprehensive procedures to deal with potential conflicts of interest. A register of interests, covering Commissioners and staff, is held and updated on an annual basis. This is available for examination by any member of the public wishing to do so, and Commissioners' information is published on the Scottish Land Commission's website. Commissioners record any potential conflicts of interest at the start of every Commission Board meeting and, where appropriate, absent themselves from decisions on any matters in which they have an interest. These declarations are recorded in the minutes of the meeting.

## External audit

Deloitte has been appointed as the Scottish Land Commission's external auditor for a five-year period from 1 April 2022.

## Internal audit

The internal audit function is an integral part of the internal control system. The Scottish Land Commission's internal audit service for the financial year 2024/25 was provided by BDO LLP, who undertook work based on an analysis of the risk to which the Commission was exposed. During 2024/25 BDO LLP reviewed and evaluated the Scottish Land Commission's processes in the following areas:

- Risk Management
- Corporate Governance
- Follow up of recommendations

The findings are presented in the reports issued during the year to the Senior Management Team and the Audit and Risk Committee. These include an opinion on the adequacy and effectiveness of the system of internal control, together with recommendations for improvements.

A total of seven recommendations were made during the year, all assessed as medium to low risk, with no high-risk recommendations identified. In addition, 23 recommendations were carried forward from previous years. This represents a reduction from 33 actions in the prior year, reflecting the progress made in addressing recommendations in line with organisational priorities and the capacity of the team.

Each year the Internal Audit provider issues an annual report which includes an opinion on the system of internal control.

The findings of the review of the Commission's risk management, governance and internal control processes provided the Commission with reasonable assurance that there are no major weaknesses in the internal control systems for the areas reviewed in 2024/25.

In their annual report, Internal Audit acknowledged that resource changes had had an impact on the Commission's ability to implement all recommendations made. Of the 27 recommendations due to be implemented, 12 recommendations (46%) have been categorised as fully implemented, 8 (30%) have been categorised as partially implemented, 4 (15%) require further evidence to be provided to verify that they've been implemented and three (11%) were suspended.

## **Data and information management**

Procedures are in place to ensure compliance with data and information management obligations. The Commission has had one recorded or reported instance of data loss or breaches during the year. The Commission has taken steps to ensure compliance with GDPR obligations. The Commission has a dedicated Data Protection Officer, Information Asset Owners and Senior Information Risk Owner.

There has been an increased risk in cyber security, associated with home working, a disrupted environment and heightened international tensions. The Commission recognises the importance of ensuring cyber resilience and has continued to work with Scottish Government to make sure that our digital technologies are in line with the Scottish Public Sector Action Plan on Cyber Resilience. The Scottish Land Commission renewed its Cyber Essentials certification and achieved Cyber Essentials Plus. The Commission again carried out training of staff and simulated exercises on the importance of remaining vigilant to phishing attacks and scenario planning for potential breaches.

## **Anti-corruption and anti-bribery matters**

The Commission has an Anti-Fraud Policy in place and there have been no reported incidents of corruption or fraud.

## **Significant governance issues**

During 2024/25 there were no significant governance issues to report.

## Governance focus looking ahead

The key governance challenges going forward centre on delivery of outcomes in the context of growing financial constraints in the public sector:



Achieving delivery of the Scottish Land Commission's strategic plan and programme of work and contributing to Scotland's national outcomes



Examining new ways of working to help deliver climate action commitments and create a flexible working environment for staff



Building upon our existing programme of organisational development to shape the type of organisation we want to be focusing on improving business planning



Further developing the scheme of delegation as the Scottish Land Commission evolves to ensure it operates in an efficient and effective way



Continued development of the project management approach including delivery reporting, evaluation model and performance management information including key performance indicators



Ongoing programme of training and development for Commissioners based on skills and development requirements



Ensuring the effective governance of the Staff Engagement Forum and the Staffing and Remuneration Committee in helping shape organisational development



Maintaining an effective working relationship with PCS to support staff wellbeing at work.

## Management assurances

The Accountable Officer's review of the effectiveness of the system of internal control and risk management arrangements is informed by:

1. Letter of assurance supported by a completed internal control checklist, agreed by the Heads of Service identifying controls and if applicable stating areas of concern
2. The work of internal auditors, including in-year reports to the Scottish Land Commission's Audit and Risk Committee (this includes their independent and objective opinion on the adequacy and effectiveness of the Commission's systems of internal control together with recommendations for improvement)
3. Comments made by external audit in their reports
4. The annual report, and quarterly updates, provided by the Chair of the Audit and Risk Committee to the Board, detailing the work of that committee during the year
5. Quarterly reviews by the Audit and Risk Committee of the organisation's risk register and the work of internal audit in assessing effectiveness of risk management arrangements
6. Letters of assurance from the Cairngorms National Park Authority who provide a shared HR service to the Scottish Land Commission.

## Conclusion

Based on the sources of assurance identified above, and the continuous review of corporate governance practices in line with the SPF best practice principles and guidance, I am satisfied that appropriate governance controls are in place and these are operating effectively. The framework of controls needs to continue to develop as the organisation matures to ensure it is proportionate and effective.

## Remuneration and Staff Report

The Remuneration and Staff Report is subject to audit except for the Remuneration Policy, Gender Note, Sickness Absence date, staff policies with regards to Equal Opportunities, Disability and Diversity, Fairness at Work and Learning and Development Policies, which are reviewed by Audit Scotland for consistency with the audited accounts.

### Remuneration policy

#### Board Members

The Scottish Land Commission Board comprises six Commissioners. Commissioners' remuneration is approved by Scottish Ministers and is determined according to the Public Sector Pay Policy for Senior Appointment (see [www.scotland.gov.uk/publications](http://www.scotland.gov.uk/publications) for further detail).

Current Board Member appointments are non-pensionable. Lorne MacLeod, Dr Bob McIntosh and Dr Sally Reynolds were reappointed to the Commission's Board from 19 December 2021 for three years. Their appointments concluded on 18 December 2024.

On 1 February 2024, three new members of the Board were appointed on five-year terms (Michael Russell, Chair, Dr Craig Mackenzie and Professor Deb Roberts, Land Commissioners).

On 19 December 2024, three new members of the Board were appointed on five-year terms (Rob Black, Dr Lucy Beattie and Dr Calum MacLeod). Scottish Government led the recruitment process for all new appointments.

#### Staff

All permanent and fixed-term staff are employees of the Scottish Land Commission. For 2024/25 the Commission has adopted the Scottish Government pay grading policy to determine salary levels in line with Scottish Government Pay Policy and Remuneration Committee approval.

All pay negotiations are conducted with PCS in line with our recognition agreement. The CEO role salary level is separate to this and falls under Scottish Government Finance Pay Policy. Consideration is given to the need for pay to be set at a level which will ensure the recruitment, retention and motivation of staff. Also kept under consideration are the Government's policies on Civil Service and public sector pay and the need to closely observe public spending controls. Performance of all staff is monitored through a performance appraisal system.

## Audit and Risk Committee

Until 19 December 2024 the Scottish Land Commission's Audit and Risk Committee was comprised of three Commissioners. From 1 February 2025 the Audit and Risk Committee is comprised of two Commissioners and one co-opted member from an external organisation. The co-opted member was not in receipt of any remuneration and therefore is not included in the following report.

## Board remuneration (audited)

Commissioners were due remuneration as follows

Commissioners who held office during 2024-25	2024-25 (£)	2023-24 (£)
Michael Russell (Chair)	10,000 - 15,000	0 - 5,000
Dr Bob McIntosh (Tenant Farming Commissioner)	15,000 - 20,000	20,000 - 25,000
Dr Sally Reynolds (Land Commissioner)	0 - 5,000	5,000 - 10,000
Lorne MacLeod (Land Commissioner)	0 - 5,000	5,000 - 10,000
Craig Mackenzie (Land Commissioner)	5,000 - 10,000	0 - 5,000
Deborah Roberts (Land Commissioner)	5,000 - 10,000	0 - 5,000
Robert Black (Tenant Farming Commissioner) *	5,000 - 10,000	-
Calum Macleod (Land Commissioner) *	0 - 5,000	-
Lucy Beattie (Land Commissioner) *	0 - 5,000	-

Commissioners' appointments are non-pensionable.

Scottish Land Commission Chair is committed to four days per month.

Tenant Farming Commissioner is committed to eight days per month.

Land Commissioners are committed to two days per month.

\* Appointments began on 19/12/2024

## Remuneration of senior staff (audited)

The following section provides details of the remuneration and pension interests of the senior staff in the Scottish Land Commission

	Salary £000		Pension benefits £000		Total £000	
	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24
<b>Chief Executive</b>						
Hamish Trench	85-90	80-85	57	40	145-150	120-125
<b>Senior Management Team</b>						
Nikki Nagler	65-70	60-65	27	23	95-100	85-90
Emma Cooper Full-Year equivalent	65-70	55-60 (60-65)	31	31*	100-105	85-90*

\*Prior year pension benefit has been restated from a reported figure of £23k to £31k to take into account an error in the previous figures. The total remuneration banding has therefore increased from 80-85 to 85-90. This adjustment does not impact our primary statements.

## Compensation for loss of office

This value was nil for 2024/25 (2023/24 nil).

## Pay multiples (audited)

Reporting bodies are required to disclose the relationship between the remuneration of the highest paid staff member in their organisation along with the median, lower quartile and upper quartile remuneration figures of the organisation's workforce. The banded remuneration of the highest-paid staff member in the Scottish Land Commission in financial year 2024/25 was £85k-£90k. (2023/24: £80k-85k).

	2024/25 Salaries £	2024/25 ratio to highest paid staff member salary	2023/24 Salaries £	2023/24 ratio to highest paid staff member salary
Lower quartile	39,456	2.09	32,544	2.46
Median	44,979	1.83	39,967	2.00
Upper quartile	52,954	1.56	47,222	1.69

In 2024/25 no employees received remuneration in excess of the Chief Executive. Remuneration ranged from £30,675 to £69,018 (excluding the Chief Executive) (2023/24: £25,190 to £67,008). There was 8.76% change in the highest paid staff member salary in 2024/25 (3.35% :2023/24). The average percentage change of the workforce salaries from the previous financial year was 9.74% (4.45% 2023/24). Pay award increases within 2024/25 were in line with Scottish Government pay policy.

### Pension benefits (audited)

	Accrued pension at pension age as at 31/03/25 and related lump sum		Real increase in pension and related lump sum at pension age		CETV at 31/03/25	CETV at 31/03/24	Real increase in CETV as funded by employer
	£000		£000		£000	£000	£000
	Pension	Lump sum	Pension	Lump sum			
<b>Chief Executive</b>							
Hamish Trench	30 – 35	-	2.5 – 5	-	575	507	42
<b>Senior Management Team</b>							
Nikki Nagler	0 – 5	-	0 – 2.5	-	40	20	13
Emma Cooper	10 – 15	-	0 – 2.5	-	123	90**	14

\*CETV stands for Cash Equivalent Transfer Value and more information can be found on page 66

\*\*Prior year CETV has been restated from a reported figure of £64,000 to £90,000 to take into account an error in the previous figures. This adjustment does not impact our primary statements.

Accrued pension benefits included in this table for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the legacy scheme for the period between 1 April 2015 and 31 March 2022, following the McCloud judgment. The Public Service Pensions Remedy applies to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and 31 March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled back into the relevant legacy scheme for the remedy period and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the Alpha scheme for the period from 1 April 2015 to 31 March 2022.

## Civil Service Pensions

Pension benefits are provided through the Civil Service pension arrangements. From 1 April 2015 a new pension scheme for civil servants was introduced – the Civil Servants and Others Pension Scheme or alpha, which provides benefits on a career average basis with a normal pension age equal to the member's State Pension Age (or 65 if higher). From that date all newly appointed civil servants and the majority of those already in service joined alpha. Prior to that date, civil servants participated in the Principal Civil Service Pension Scheme (PCSPS). The PCSPS has four sections: three providing benefits on a final salary basis (classic, premium or classic plus) with a normal pension age of 60; and one providing benefits on a whole career basis (nuvos) with a normal pension age of 65.

These statutory arrangements are unfunded with the cost of benefits met by monies voted by Parliament each year. Pensions payable under classic, premium, classic plus, nuvos and alpha are increased annually in line with Pensions Increase legislation. Existing members of the PCSPS who were within 10 years of their normal pension age on 1 April 2012 remained in the PCSPS after 1 April 2015. Those who were between 10 years and 13 years and five months from their normal pension age on 1 April 2012 switch into alpha sometime between 1 June 2015 and 1 February 2022. Because the Government plans to remove discrimination identified by the courts in the way that the 2015 pension reforms were introduced for some members, it is expected that, in due course, eligible members with relevant service between 1 April 2015 and 31 March 2022 may be entitled to different pension benefits in relation to that period (and this may affect the Cash Equivalent Transfer Values shown in this report – see below).

All members who switch to alpha have their PCSPS benefits 'banked', with those with earlier benefits in one of the final salary sections of the PCSPS having those benefits based on their final salary when they leave alpha. (The pension figures quoted for officials show pension earned in PCSPS or alpha – as appropriate. Where the official has benefits in both the PCSPS and alpha the figure quoted is the combined value of their benefits in the two schemes.) Members joining from October 2002 may opt for either the appropriate defined benefit arrangement or a defined contribution (money purchase) pension with an employer contribution (partnership pension account).

Employee contributions are salary-related and range between 4.6% and 8.05% for members of classic, premium, classic plus, nuvos and alpha. Benefits in classic accrue at the rate of 1/80th of final pensionable earnings for each year of service. In addition, a lump sum equivalent to three years initial pension is payable on retirement. For premium, benefits accrue at the rate of 1/60th of final pensionable earnings for each year of service. Unlike classic, there is no automatic lump sum.

Classic plus is essentially a hybrid with benefits for service before 1 October 2002 calculated broadly as per classic and benefits for service from October 2002 worked out as in premium. In nuvos a member builds up a pension based on his pensionable earnings during their period of scheme membership. At the end of the scheme year (31 March) the member's earned pension account is credited with 2.3% of their pensionable earnings in that scheme year and the accrued pension is uprated in line with Pensions Increase legislation. Benefits in alpha build up in a similar way to nuvos, except that the accrual rate is 2.32%. In all cases members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004.

The partnership pension account is an occupational defined contribution pension arrangement which is part of the Legal & General Mastertrust. The employer makes a basic contribution of between 8% and 14.75% (depending on the age of the member). The employee does not have to contribute, but where they do make contributions, the employer will match these up to a limit of 3% of pensionable salary (in addition to the employer's basic contribution). Employers also contribute a further 0.5% of pensionable salary to cover the cost of centrally provided risk benefit cover (death in service and ill health retirement).

The accrued pension quoted is the pension the member is entitled to receive when they reach pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over pension age. Pension age is 60 for members of classic, premium and classic plus, 65 for members of nuvos, and the higher of 65 or State Pension Age for members of alpha. (The pension figures quoted for officials show pension earned in PCSPS or alpha – as appropriate. Where the official has benefits in both the PCSPS and alpha the figure quoted is the combined value of their benefits in the two schemes, but note that part of that pension may be payable from different ages.)

It is anticipated that employers contributions to all pension plans in 2025/26 would be around £240,000.

Further details about the Civil Service pension arrangements can be found at the website: [www.civilservicepensionscheme.org.uk](http://www.civilservicepensionscheme.org.uk).

## **Cash Equivalent Transfer Values**

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVs are worked out in accordance with the Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 and do not take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

### **Real increase in CETV**

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

## Staff Report

### Staff costs and numbers (audited)

	Permanent staff	Board members	Others	Total 2024/25	Total 2023/24
	£000	£000	£000	£000	£000
Salaries	817	60	-	877	771
Social security costs	90	3	-	93	79
Other pension costs	236	-	-	236	198
Inward secondment and agency staff	-	-	-	-	(55)
<b>Total</b>	<b>1,143</b>	<b>63</b>	<b>-</b>	<b>1,206</b>	<b>993</b>

### Average number of employees (audited)

The average number of full time equivalent (FTE) persons employed during the year

	Number 2024/25	Number 2023/24
Senior management	3.00	2.86
Professional, managerial, administration and support	14.03	12.42
<b>Total</b>	<b>17.03</b>	<b>15.28</b>

### Gender note

	Males 31 March 2025	Females 31 March 2025	Males 31 March 2024	Females 31 March 2024
Commissioners	4	2	4	2
Chief Executive	1	-	1	-
Employees	5	11	4	13

### Sickness absence

Sickness absence during the year to 31 March 2025 was 73 days (2024: 81 days), representing 1.61% of the total number of available days (2024: 2.2%). This equates to an average number of days sickness per member of staff of 4.2 days (2024: 4.5 days).

## Exit packages

There were no exit packages within 2024/25 (2023/24: nil).

## Turnover rate

During 2024/25 the Scottish Land Commission has had two permanent members of staff leave, this represents a staff turnover figure of 11% (22% 2023/24). In addition to this, the Commission had one fixed term appointment leave, which if included represents a staff turnover figure of 17% (39% 2023/24).

## Equal Opportunities, Disability and Diversity Policies

The Scottish Land Commission adopts the Scottish Government policies on equal opportunities and diversity. The policy on equal opportunity states that all staff should be treated equally irrespective of their sex, marital/civil partnership status, age, race, ethnic origin, sexual orientation, disability, religion or belief, working pattern, employment status, gender identity (transgender), maternity or paternity status, caring responsibility or trade union membership. The Commission will seek to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for learning and development, pay and benefits, discipline and selection for redundancy. In line with Scottish Government policy, the Scottish Land Commission is specifically required to increase the diversity of staff within the organisation. The Commission cannot directly discriminate in the selection of employees for recruitment or promotion, but the Commission may use appropriate lawful methods, including lawful positive action to address under-representation of any group that the Commission identifies as being under-represented in particular types of jobs. Employment and development of disabled persons is covered by our equal opportunities and diversity policy and as part of the organisation's commitment to the Disability Confident scheme; applications for employment received from any candidate who indicates that they have a disability will be automatically short-listed if they demonstrate that they meet all the essential short-listing criteria for the role. The Scottish Land Commission will make reasonable adjustments to its standard working practices to overcome barriers caused by disability. The Scottish Land Commission undertakes to develop all staff, positively values the different perspectives and skills each brings to our work, and has adopted a comprehensive learning and development policy and fairness at work policy.

The Scottish Land Commission offers flexible working by offering both home and office working to its staff. The Scottish Land Commission is committed to delivering its functions in a manner that encourages equal opportunities, aims to eliminate unlawful discrimination and other conduct prohibited by equality legislation.

# Parliamentary Accountability Report

## Losses and special payments

There were no losses or special payments made during the year 2024/25 (2023/24: nil).

## Gifts and charitable donations

There were no gifts or charitable donations made during the year 2024/25 (2023/24: nil).

## Remote contingent liabilities

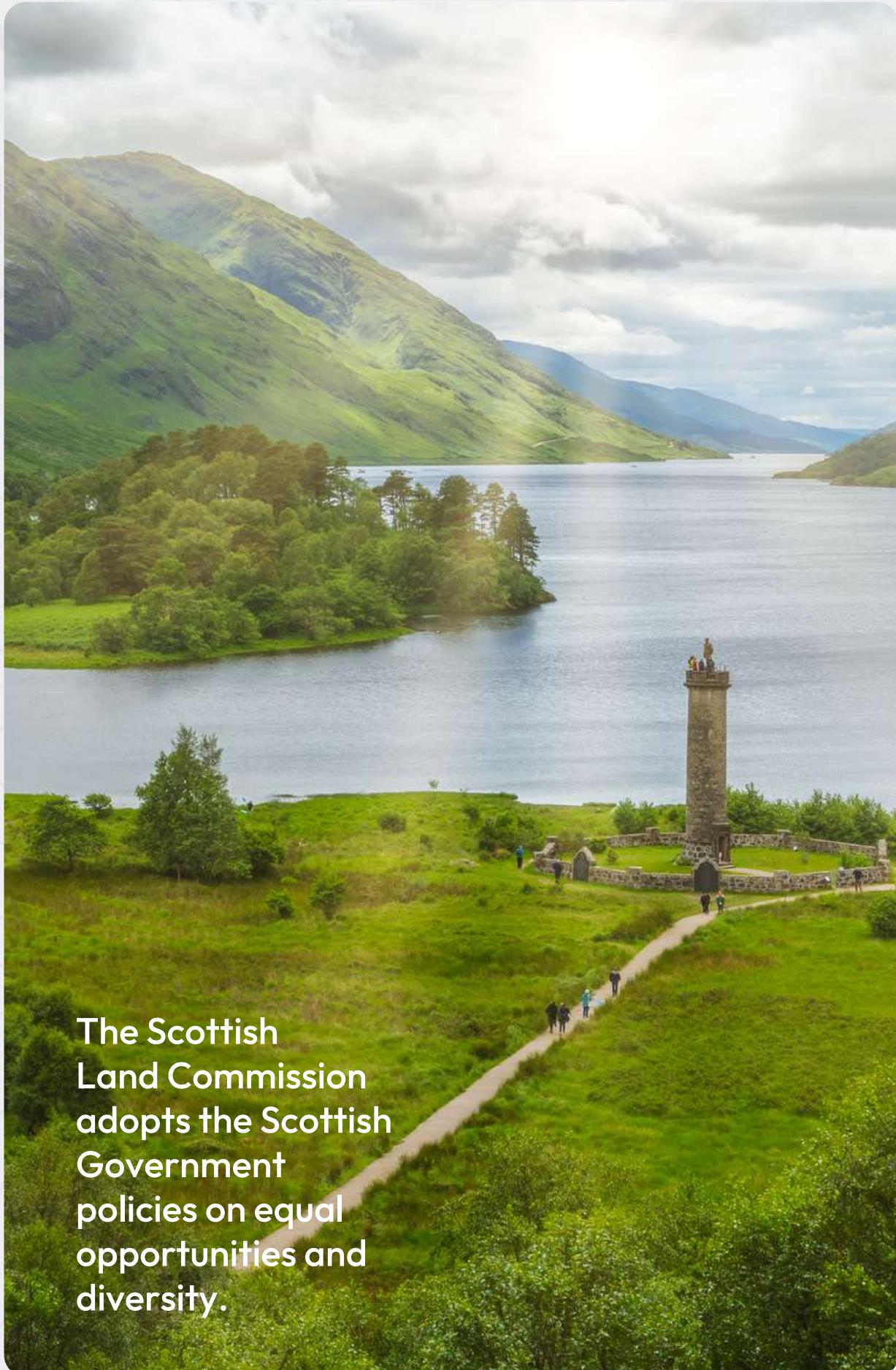
The Scottish Land Commission is required to report any liabilities for which the likelihood of a transfer of economic benefit in settlement is too remote to meet the definition of contingent liability under IAS37. There are no remote contingent liabilities.

## Fees and charges income

The Scottish Land Commission received nil fees or charges income within the year 2024/25 (2023/24: nil).



Hamish Trench  
Chief Executive and Accountable Officer  
27 October 2025



**The Scottish  
Land Commission  
adopts the Scottish  
Government  
policies on equal  
opportunities and  
diversity.**

## Independent auditor's report to Scottish Land Commission, the Auditor General for Scotland and the Scottish Parliament

### Reporting on the audit of the financial statements

#### Opinion on financial statements

We have audited the financial statements in the annual report and accounts of Scottish Land Commission for the year ended 31 March 2025 under the Land Reform (Scotland) Act 2016. The financial statements comprise the Statement of Comprehensive Net Expenditure, the Statement of Financial Position, the Statement of Cash Flows, the Statement of Changes in Taxpayers' Equity and notes to the financial statements, including material accounting policy information. The financial reporting framework that has been applied in their preparation is applicable law and UK adopted international accounting standards, as interpreted and adapted by the 2024/25 Government Financial Reporting Manual (the 2024/25 FReM).

In our opinion the accompanying financial statements:

- give a true and fair view of the state of the body's affairs as at 31 March 2025 and of its net expenditure for the year then ended;
- have been properly prepared in accordance with UK adopted international accounting standards, as interpreted and adapted by the 2024/25 FReM; and
- have been prepared in accordance with the requirements of the Land Reform (Scotland) Act 2016 and directions made thereunder by the Scottish Ministers.

#### Basis for opinion

We conducted our audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)), as required by the Code of Audit Practice approved by the Auditor General for Scotland. Our responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of our report. We were appointed by the Auditor General on 18 May 2022. Our period of appointment is five years, covering 2022/23 to 2026/27. We are independent of the body in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the body. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## **Conclusions relating to going concern basis of accounting**

We have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the body's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

These conclusions are not intended to, nor do they, provide assurance on the body's current or future financial sustainability. However, we report on the body's arrangements for financial sustainability in a separate Annual Audit Report available from the Audit Scotland website.

## **Risks of material misstatement**

We report in our Annual Audit Report the most significant assessed risks of material misstatement that we identified and our judgements thereon.

## **Responsibilities of the Accountable Officer for the financial statements**

As explained more fully in the Statement of Accountable Officer's Responsibilities, the Accountable Officer is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Accountable Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Accountable Officer is responsible for assessing the body's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention to discontinue the body's operations.

## **Auditor's responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws

and regulations. We design procedures in line with our responsibilities outlined above to detect material misstatements in respect of irregularities, including fraud. Procedures include:

- using our understanding of the central government sector to identify that the Land Reform (Scotland) Act 2016 and directions made thereunder by the Scottish Ministers are significant in the context of the body;
- inquiring of the Accountable Officer as to other laws or regulations that may be expected to have a fundamental effect on the operations of the body;
- inquiring of the Accountable Officer concerning the body's policies and procedures regarding compliance with the applicable legal and regulatory framework;
- discussions among our audit team on the susceptibility of the financial statements to material misstatement, including how fraud might occur; and
- considering whether the audit team collectively has the appropriate competence and capabilities to identify or recognise non-compliance with laws and regulations.

We obtained an understanding of the legal and regulatory framework that the body operates in, and identified the key laws and regulations that:

- had a direct effect on the determination of material amounts and disclosures in the financial statements.
- Do not have a direct effect on the financial statements but compliance with which may be fundamental to the body's ability to operate or to avoid a material penalty. These include the Data Protection Act 2018 and relevant employment legislation.

As a result of performing the above, we identified the greatest potential for fraud was in relation to the requirement to operating within the expenditure resource limit allocated by the Scottish Government as part of the Budget (Scotland) Act. The risk is that the expenditure in relation to year-end transactions may be subject to potential manipulation in an attempt to align with its tolerance target or achieve a breakeven position. In response to this risk, we obtained confirmation of the resource limit allocated by the Scottish Government and tested a sample of accruals, prepayments and invoices received around the year-end to assess whether they have been recorded in the correct period.

In common with audits under ISAs (UK) we are also required to perform specific procedures to respond to the risk of management override. In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments, assessed whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluated the business rationale of any

significant transactions that are unusual or outside the normal course of business.

In addition to the above, our procedures to respond to the risks identified included the following:

- reviewing financial statement disclosures by testing to supporting documentation to assess compliance with provisions of relevant laws and regulation described as having a direct effect on the financial statements;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatements due to fraud;
- enquiring of management and internal audit concerning actual and potential litigation and claims, and instances of non-compliance with laws and regulations; and
- reading minutes of meetings of those charged with governance and reviewing internal audit reports.”

The extent to which our procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the body's controls, and the nature, timing and extent of the audit procedures performed.

Irregularities that result from fraud are inherently more difficult to detect than irregularities that result from error as fraud may involve collusion, intentional omissions, misrepresentations, or the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditor's report.

## **Reporting on regularity of expenditure and income**

### **Opinion on regularity**

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

### **Responsibilities for regularity**

The Accountable Officer is responsible for ensuring the regularity of expenditure and income. In addition to our responsibilities in respect of

irregularities explained in the audit of the financial statements section of our report, we are responsible for expressing an opinion on the regularity of expenditure and income in accordance with the Public Finance and Accountability (Scotland) Act 2000.

## Reporting on other requirements

### Opinion prescribed by the Auditor General for Scotland on audited parts of the Remuneration and Staff Report

We have audited the parts of the Remuneration and Staff Report described as audited. In our opinion, the audited parts of the Remuneration and Staff Report have been properly prepared in accordance with the Land Reform (Scotland) Act 2016 and directions made thereunder by Scottish Ministers.

### Other information

The Accountable Officer is responsible for the other information in the annual report and accounts. The other information comprises the Performance Report and the Accountability Report excluding the audited parts of the Remuneration and Staff Report.

Our responsibility is to read all the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon except on the Performance Report and Governance Statement to the extent explicitly stated in the following opinions prescribed by the Auditor General for Scotland.

### Opinions prescribed by the Auditor General for Scotland on Performance Report and Governance Statement

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Performance Report for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Land Reform (Scotland) Act 2016 and directions made thereunder by the Scottish Ministers; and
- the information given in the Governance Statement for the financial year

for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Land Reform (Scotland) Act 2016 and directions made thereunder by the Scottish Ministers.

### **Matters on which we are required to report by exception**

We are required by the Auditor General for Scotland to report to you if, in our opinion:

- adequate accounting records have not been kept; or
- the financial statements and the audited parts of the Remuneration and Staff Report are not in agreement with the accounting records; or
- We have not received all the information and explanations we require for our audit.

We have nothing to report in respect of these matters.

### **Conclusions on wider scope responsibilities**

In addition to our responsibilities for the annual report and accounts, our conclusions on the wider scope responsibilities specified in the Code of Audit Practice are set out in our Annual Audit Report.

### **Use of our report**

This report is made solely to the parties to whom it is addressed in accordance with the Public Finance and Accountability (Scotland) Act 2000 and for no other purpose. In accordance with paragraph 108 of the Code of Audit Practice, we do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.



**Sarah McGavin, CA**

For and on behalf of Deloitte LLP  
8th Floor  
The Silver Fin Building  
455 Union Street  
Aberdeen  
AB11 6DB

27 October 2025

# Financial Statements



# Financial statements

## Statement of comprehensive net expenditure

For the year ended 31 March 2025

		2025	2024
	Note	£000	£000
Staff costs	2	1,206	993
Other operating expenses	3	439	482
Total operating expenditure		1,645	1,475
Net operating expenditure		1,645	1,475

The notes on pages 82-92 form part of these accounts.

## Statement of financial position

As at 31 March 2025

		2025	2024
	Note	£000	£000
<b>Current assets</b>			
Trade and other receivables	5	32	31
Cash and cash equivalents	6	106	214
Total current assets		138	245
<b>Current liabilities</b>			
Trade and other payables	7	(55)	(130)
Total current assets less current liabilities		83	115
Total assets less current liabilities		83	115
<b>Taxpayers' equity</b>			
General reserve		83	115

The Accountable Officer authorised these financial statements for issue on 27 October 2025.

Only events up until the authorised for issue date are reflected in these accounts.

The notes on pages 82-92 form part of these accounts.



Hamish Trench  
Chief Executive and Accountable Officer  
27 October 2025

## Statement of cash flows

For the year ended 31 March 2025

		2025	2024
	Note	£000	£000
<b>Cash flows from operating activities</b>			
Net operating expenditure		(1,645)	(1,475)
		(1,645)	(1,475)
<b>Movement in working capital</b>			
(Decrease)/increase in trade and other payables	7	(75)	35
Increase in trade and other receivables	5	(1)	(14)
		(76)	21
Net cash flow from operating activities		(1,721)	(1,454)
<b>Financing activities</b>			
Grant-in-aid		1,615	1,535
Repayments of taxpayers' equity to The Scottish Government		(53)	-
Other income		51	-
Net cash flow from financing activities		1,613	1,535
Net (decrease)/increase in cash and cash equivalents		(108)	79
Cash and cash equivalents at beginning of year	6	214	135
Cash and cash equivalents at end of year	6	106	214

The notes on pages 82-92 form part of these accounts.

## Statement of changes in Taxpayers' Equity

For the year ended 31 March 2025

General Reserve	£000
Balance at 01 April 2023	55
<b>Year ended 31 March 2024</b>	
Grant-in-aid	1,535
Other income	-
Comprehensive net expenditure for the year	(1,475)
Balance at 31 March 2024	115
<b>Year ended 31 March 2025</b>	
Grant-in-aid	1,615
Other income*	51
Comprehensive net expenditure for the year	(1,645)
Repayments of taxpayers' equity to The Scottish Government**	(53)
Balance at 31 March 2025	83

\*Made up of FIRNS and Scottish Government additional project income.

The notes on pages 82–92 form part of these accounts.

\*\* Return of underspent GIA from 23/24 to Scottish Government

## Notes to the financial statements

### 1. Accounting policies

The financial statements have been prepared in accordance with the 2024/25 Government Financial Reporting Manual (FReM) issued by HM Treasury and the Accounts Direction (page 94) issued by Scottish Ministers.

The FReM sets out the format of the annual accounts. Grant-in-Aid (GIA) is included in the General Reserve in the Statement of Changes in Taxpayers' Equity rather than included in the Statement of Comprehensive Net Expenditure.

All other income and expenditure is included in the Statement of Comprehensive Net Expenditure.

The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context.

Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be the most appropriate to the particular circumstances of the Scottish Land Commission for the purposes of giving a true and fair view has been selected.

The particular policies adopted by the Scottish Land Commission are described below. They have been applied consistently in dealing with items that are considered material to the financial statements.

The financial statements included in this report have been prepared on a going concern basis.

The Accountable Officer has considered the budget and associated Grant-in-Aid allocation for 2025/26

and considers the Scottish Land Commission to have adequate resources to continue in operational existence for the foreseeable future.

#### 1.1 Accounting convention

These accounts have been prepared under the historical cost convention.

#### 1.2 Property, plant and equipment

Expenditure on office refurbishments, office furniture and fittings, office equipment, IT equipment and infrastructure is capitalised if the asset has a value of at least £5,000 with a useful life of more than one year. General IT project management costs are not capitalised. The assets are recorded at cost and the estimated useful lives and residual values are reviewed annually in line with the asset management policy.

#### 1.3 Depreciation

Capital assets will be depreciated / amortised on a straight-line historical cost basis as follows.

##### Property, plant and equipment:

- Office refurbishment – 10 years
- Furniture – 10 years
- Office equipment – 5 years.

##### Information technology:

- IT equipment – 3 years
- IT infrastructure – 3 years.

##### Intangible assets:

- Software licences – 3 years
- Developed software and website – 3 years.



Office refurbishments and furniture is written-off over the remaining life of the lease (the date of the first lease break) if below 10 years. IT software, including developed software is written-off over the expected life if less than three years. The estimated useful lives and residual values are reviewed annually.

#### **1.4 Value Added Tax**

Irrecoverable VAT is included with the relevant costs and charged to the Statement of Comprehensive Net Expenditure in the period in which it is incurred.

#### **1.5 Employee benefits**

Salaries and employment-related payments are recognised in the year in which the service is received from employees. The cost of annual leave and flexible working time entitlement

earned but not taken by employees at the end of the year is recognised in the financial statements to the extent that employees are permitted to carry forward leave into the following year. A liability and an expense are recognised for accrued but unused annual leave and flexi leave balances at the 31 March, in accordance with the underlying policy. These costs are shown in the Remuneration and Staff Report.

#### **1.6 Pension costs**

Pension costs as reported in the Scottish Land Commission's accounts relate to the period during which it benefits from the employee's services. This includes amounts covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS), a defined benefit scheme, which are paid by the Scottish Land Commission to the PCSPS on an accruing basis.

The Commission is unable to identify its share of the underlying assets and liabilities and therefore the liability for payment of future benefits is a charge on the PCSPS which prepares its own scheme statements.

### **1.7 Trade receivables**

All material amounts due as at 31 March 2025 have been brought into the Statement of Comprehensive Net Expenditure irrespective of when actual payments were received.

### **1.8 Trade payables**

All material amounts due as at 31 March 2025 have been brought into the Statement of Comprehensive Net Expenditure irrespective of when actual payments were made.

### **1.9 Cash and cash equivalents**

Cash and cash equivalents in the statement of financial position comprise cash with the bank and in hand.

### **1.10 Grant-in-Aid**

The Scottish Land Commission receives Grant-in-Aid from the Scottish Government to finance its net expenditure. Grant-in-Aid is credited to the general reserve in the period in which it is received. The net cost of the Scottish Land Commission is charged to this fund.

### **1.11 Critical accounting judgements and key sources of estimation**

In the application of the Scottish Land Commission's accounting policies as described in Note 1, the Accountable Officer is required to make judgements, estimates and assumptions about the carrying amount of assets and liabilities that are not readily apparent from other sources.

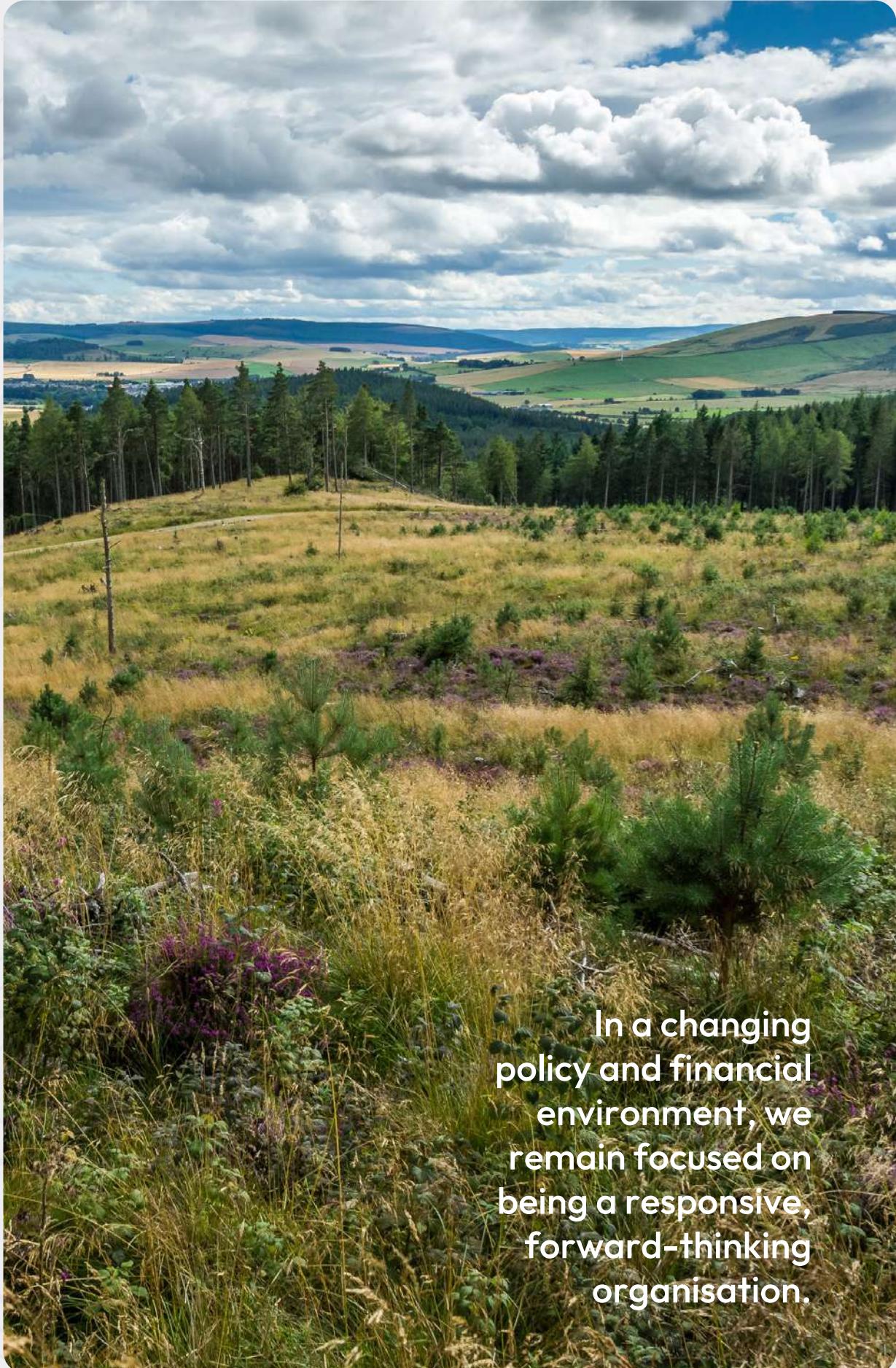
Judgements, estimates and associated assumptions are based on experience and other factors that are considered to be relevant and are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of revision and future periods if the revision affects both current and future periods.

In relation to the 2024/25 financial year there were no critical judgments or any significant estimates made.

### **1.12 Adoption of new and revised standards**

At the date of authorisation of these financial statements there were the following Accounting Standards issued, but not yet effective, which relate to the Scottish Land Commission: IFRS 14 Regulatory Deferral Accounts – Effective for accounting periods starting on or after 1 January 2016, not applicable to the Land Commission; IFRS 17 Insurance contracts – Effective for account periods beginning on or after 1 January 2021.

IFRS17 standard is not yet adopted by the FReM and is not applicable to the Scottish Land Commission.



**In a changing  
policy and financial  
environment, we  
remain focused on  
being a responsive,  
forward-thinking  
organisation.**

## 2. Staff costs

	Permanent staff	Board Members	Others	Total 2024-25	Total 2023-24
	£000	£000	£000	£000	£000
Salaries	817	60	-	877	771
Social security costs	90	3	-	93	79
Other pension costs	236	-	-	236	198
Inward secondment and agency staff	-	-	-	-	(55)
Total	1,143	63	-	1,206	993

## 3. Other operating expenses

	2025	2024
	£000	£000
Accommodation expenses	29	18
Research & Policy	67	147
Information systems & telecommunications	5	26
Training	15	26
Public meetings & conference expenses	33	7
Travel & subsistence - Commissioners	13	13
Travel & subsistence - staff	21	26
Communications activity	34	50
Human resources shared services	18	15
IT service	71	70
Legal and professional fees	22	28
Collaborations	42	-
External Auditor's remuneration	36	34
Internal Auditor's remuneration	27	12
Other running costs	6	10
Total	439	482

#### 4. Property, plant and equipment

##### Information technology 2023-24

Cost	£000
At 1 April 2023	7
Additions	-
At 31 March 2024	7
Depreciation and impairment	
At 1 April 2023	7
Depreciation charged in the year	-
At 31 March 2024	7
Carrying amount	
At 31 March 2024	-
At 31 March 2023	-

##### Information technology 2024-25

Cost	£000
At 1 April 2024	7
Additions	-
Disposals	(7)
At 31 March 2025	-
Depreciation and impairment	
At 1 April 2024	7
Depreciation charged in the year	-
Eliminated on disposals	(7)
At 31 March 2025	-
Carrying amount	
At 31 March 2025	-
At 31 March 2024	-

## 5. Trade and other receivables

	2025	2024
Amounts falling due within one year	£000	£000
Trade receivables	9	21
Prepayments and accrued income	23	10
Total	32	31

## 6. Cash and cash equivalents

	£000
Balance at 01 April 2024	214
Net change in cash & cash equivalents	(108)
Balance at 31 March 2025	106
The following balances at 31 March were held with the government banking service and cash in hand	106
Balance at 31 March 2025	106

## 7. Trade and other payables

	2025	2024
	£000	£000
Trade payables	-	23
Accruals	55	107
Total	55	130

## 8. Commitments under other non-cancellable agreements

Total minimum future payments under contracts entered into prior to 31 March 2025 are given in the table below for each of the following periods. Obligations under these contracts from 31 March 2025 comprise:

Projects	2025 £000	2024 £000
Not later than one year	107	144
Later than one year and not later than five years	85	153

## 9. Related party transactions

The Scottish Land Commission is an NDPB sponsored by the Scottish Government and considers the following bodies to be related parties:

The Scottish Land Commission's Sponsor Directorate is the Scottish Government's Sustainable Land Use and Rural Policy Directorate (the Sponsor Directorate) and the Scottish Land Commission had significant material transactions with the Sponsor Directorate during the financial year. Financial transactions with the Directorate comprised Grant-in-Aid as disclosed in the Changes in Taxpayers Equity statement. In addition the commission had a member of staff seconded to the Scottish Government.

The Cairngorms National Park Authority is also an NDPB sponsored by the Scottish Government and provided the Commission with HR and payroll services during the year, at a cost of £9,000 (£15,000 2023/24). This arrangement was altered for financial year 2024/25 with reduced HR support.

Highlands and Islands Enterprise is a public sector agency and provided the Commission with the use of office space within the year at their An Lòchran office in Inverness, at a cost of £28,000 (£19,000 2023/24).

None of the Commission's members or key managerial staff have had any related party transactions during the year.

## 10. Financial instruments

Due to the non-trading nature of the Scottish Land Commission's activities and the way in which Government departments are financed, the Scottish Land Commission is not exposed to the degree of financial risk faced by business entities. The Scottish Land Commission has no borrowings and relies on grants from Scottish Government for its cash requirements. The Scottish Land Commission is therefore not exposed to liquidity risks. It has no material deposits and all material assets and liabilities are denominated in sterling, so it is not exposed to interest rate risk or currency risk.

Financial assets are recognised on the Statement of Financial Position when the Scottish Land Commission becomes party to the financial instrument contract or, in the case of trade receivables, when the goods or services have been delivered. Financial assets are derecognised when the contractual rights have expired, or the asset has been transferred. The Scottish Land Commission has no financial assets other than cash and trade receivables. There were prepayments of £23,000, and Trade Receivables of £9,000 this year. Prepayments do not meet the definition of a financial instrument. The financial instrument is therefore only cash and cash equivalents, details of which are in Note 6. Trade receivables do not carry any interest and are stated at their nominal value less any provision for impairment.

Financial liabilities are recognised in the Statement of Financial Position when the Scottish Land Commission becomes party to the contractual provisions of the financial instrument or, in the case of trade payables, when the goods or services have been received. Financial liabilities are derecognised when the liability has been discharged, that is, the liability has been paid or has expired. The Scottish Land Commission has no financial liabilities other than trade payables. Trade payables are not interest bearing and are stated at their nominal value.

## 11. Subsequent events

Events taking place after the date the financial statements were authorised for issue are not reflected in the financial statements or notes. Where events taking place before this date provided information about conditions existing at 31 March 2025, the figures in the financial statements and notes have been adjusted in all material respects to reflect the impact of this information.

We have no subsequent events.

## 12. Segment information

IFRS 8 requires operating segments to be identified on the basis of internal reports about components of the organisation that are regularly reviewed by the chief operating decision maker in order to allocate resources to the segment and to assess its performance.

The Scottish Land Commission reports segmental information based on the priority areas and outcomes outlined in the Strategic Plan and agreed by the management team and the Board. The accounting policies of the reportable outcomes are the same as those accounting policies described in note 1 (page 82).

During 2024/25 the Scottish Land Commission delivered its programme of work through the following priority areas as set out in the Performance Report section (pages 18 to 30) of the annual report.

The table presents management information on income and expenditure relating to the operating segments for the year ended 31 March 2025.

Other assets and liabilities are not reported on a segmental basis as they do not form part of the regular review by management to make decisions about resources to be allocated to the segment or to assess its performance.



## Expenditure year ended 31 March 2025

	Core operating costs	Priority 1	Priority 2	Priority 3	Priority 4	Total
	£000	£000	£000	£000	£000	£000
Commissioner Costs	76	-	-	-	-	76
Staff Costs	1,179	-	-	-	-	1,179
Corporate Services	212	-	-	-	-	212
Communications and events	68	-	-	-	-	68
Other costs	-	42	42	25	1	110
Total	1,535	42	42	25	1	1,645



# Accounts Direction





THE SCOTTISH LAND COMMISSION  
DIRECTION BY THE SCOTTISH MINISTERS

1. The Scottish Ministers, in accordance with Section 19 of the Land Reform (Scotland) Act 2016, hereby give the following direction.
2. The statement of accounts for the financial year ended 31 March 2018, and subsequent years, shall comply with the accounting principles and disclosure requirements of the edition of the Government Financial Reporting Manual (FReM) which is in force for the year for which the statement of accounts are prepared.
3. The accounts shall be prepared so as to give a true and fair view of the income and expenditure and cash flows for the financial year, and of the state of affairs as at the end of financial year.
4. This direction shall be reproduced as an appendix to the statement of accounts.

Signed by the authority of the Scottish Ministers.

10 May 2018



Ma tha sibh ag iarraidh lethbhreac den sgrìobhainn seo sa Ghàidhlig, cuiribh post-d gu [commsteam@landcommission.gov.scot](mailto:commsteam@landcommission.gov.scot) no cuiribh fòn gu **01463 423 300**.

If you would like to request a copy of this document in Gaelic, please email [commsteam@landcommission.gov.scot](mailto:commsteam@landcommission.gov.scot) or call **01463 423 300**.



Scottish Land Commission  
Coimisean Fearainn na h-Alba

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