

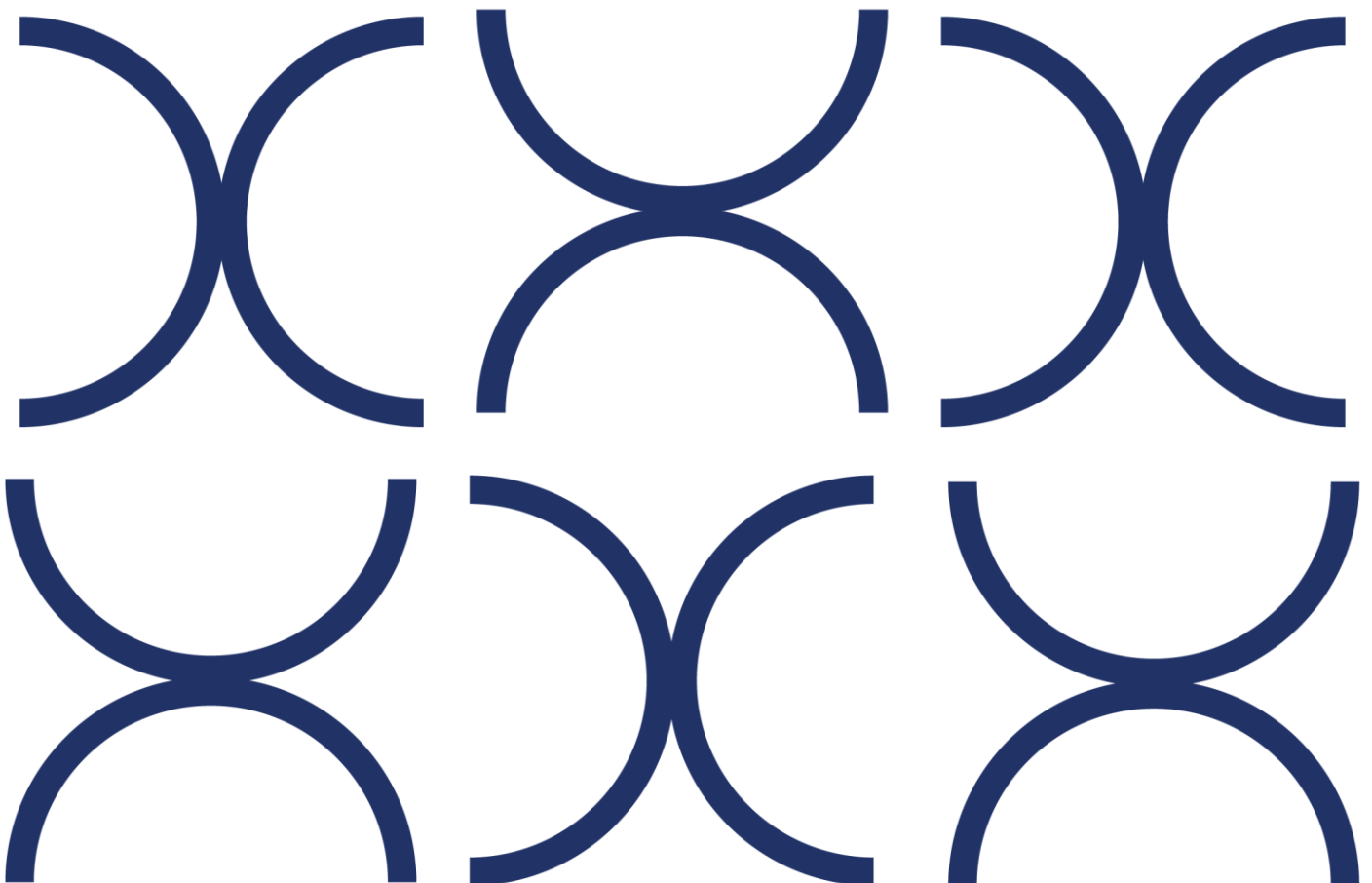


Government
Legal Department

Government Legal Department Annual Report and Accounts

2024-25

HC 901



Government Legal Department

Annual Report and Accounts 2024-25

For the year ended 31 March 2025

Accounts presented to the House of Commons pursuant to section 7 of the
Government Resources and Accounts Act 2000

Annual Report presented to the House of Commons by Command of His Majesty

Ordered by the House of Commons to be printed on 10 July 2025



© Crown copyright 2025

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated
To view this licence, visit: www.nationalarchives.gov.uk/doc/open-government-licence/version/3

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned

This publication is available at: www.gov.uk/government/official-documents

Any enquiries regarding this publication should be sent to us at:
Government Legal Department, 102 Petty France, London SW1H 9GL

ISBN 978-1-5286-5705-1
E03357413 07/25

Printed on paper containing 40% recycled fibre content minimum
Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office

Preface

About this Annual Report and Accounts

This document integrates performance and financial data to help readers gain a better understanding of the work of the Government Legal Department (GLD). It covers the activities of GLD from 1 April 2024 to 31 March 2025 and is split into 3 main sections:

The Performance Report includes a summary of the department's purpose, strategy and activities (the Performance Overview) followed by a review of progress against our performance measures and key priorities (the Performance Analysis).

The Accountability Report is further split into 3 sub sections and includes:

- a Corporate Governance Report, which includes the Directors' Report, the Statement of Accounting Officer's responsibilities and a Governance Statement;
- a Remuneration and Staff Report, which includes pay and benefits received by executive and non-executive Board members and details of staff numbers and costs; and
- a Parliamentary Accountability and Audit Report, which includes a copy of the Audit Certificate and Report made to the House of Commons by the Comptroller and Auditor General setting out his opinion on the financial statements and other information in the Annual Report.

The Financial Statements show GLD's income and expenditure for the financial year, the financial position of GLD as at 31 March 2025 and additional information designed to help readers understand these results.

Contents

05	Preface
07	Chief Executive's Report
08	Chair of the Board's Foreword
10	Performance Report
10	Performance Overview
10	Who we are
12	Core purpose and vision
12	GLD Strategy 2024-2027
15	What we do
18	How we are funded
18	Risk management
20	Looking to the future
23	Performance Analysis
23	Performance measures
24	Delivery in 2024-25
29	Financial performance
30	Community and social matters
30	Sustainability
32	Accountability Report
32	Corporate Governance Report
32	Directors' Report
32	Statement of Accounting Officer's Responsibilities
33	Governance Statement
46	Remuneration and Staff Report
46	Remuneration Report
53	Staff Report
59	Parliamentary Accountability and Audit Report
60	The Certificate and Report of the Comptroller and Auditor General to the House of Commons
64	Financial Statements
64	Statement of Comprehensive Net Income for the year ended 31 March 2025
65	Statement of Financial Position as at 31 March 2025
66	Statement of Cash Flows for the year ended 31 March 2025
67	Statement of Changes in Taxpayers' Equity for the year ended 31 March 2025
68	Notes to the Accounts
79	Annex A: Sustainability Report for the year ended 31 March 2025
84	Glossary

Chief Executive's Report

I am pleased to share the Government Legal Department's Annual Report and Accounts for 2024-25. Since taking up my position as Treasury Solicitor in 2021, I have always been proud of the way my department, the Government Legal Department (GLD) has delivered our legal services in service of our long-standing purpose: to help the government to govern well, within the rule of law. The last year has been one of significant change at home and challenge across the globe. Following the General Election in July 2024, GLD teams seamlessly supported the transition and the focus on mission-led government, to deliver for the people of the United Kingdom.

We have supported the government taking its first steps to deliver the Plan for Change and other critical work. I am immensely proud of the work undertaken by our teams producing new legislation, negotiating trade deals, conducting high profile litigation and advising on sensitive national security matters. Across all our disciplines – our dedicated lawyers, supported by vital corporate services colleagues, have helped the government to deliver their priorities. You can read examples of our work within this report. Our People remain at the heart of all we do, and to renew our commitment to them, in February, we launched our new People Strategy, setting direction and focus over the next three years to equip us to deliver much more than the law – highlighting the difference we make to society.

At the end of September, we held an all-staff conference: the first since 2018. Over 1,500 colleagues came together to connect, to learn and show case our role supporting the government of the day. We highlighted the new mission-based approach to government, welcomed the Attorney General's commitment to the rule of law and his championship of government lawyers and enjoyed hearing about the role GLD plays across the legal profession with the Law Society and Bar Council. The atmosphere in the hall was electric, not least during our GLD Awards ceremony celebrating the brilliant work of colleagues across the department. I ended the day on a real high, feeling immensely proud of what we've achieved over the year and its impact on our fellow citizens.

I will pick out two achievements over the past year that we will continue to build on: Firstly, GLD's structure as the main provider of legal services across Government has enabled us to pivot quickly to this mission-driven government. We have GLD Directors General on each Mission Board co-ordinating the right legal expertise to



support mission priorities and we will continue to play an integral role in fixing the foundations of the country, achieving the milestones of the Plan for Change and supporting the decade of national renewal.

The second is in the evolution of our corporate services and systems through the introduction and developing capability of our Chief Operating Officer (COO) Group. Our legal expertise must be enabled by great technology, data management and excellent cross-functional professional experts, with a key step forward this year being the establishment of the Legal Operations Directorate. Learning from the best in the private sector we are continually challenging ourselves to be more professional and more efficient.

I would like to take this opportunity to thank our Non-Executive Directors, the Rt Hon Dame Janet Paraskeva DBE PC, Mike Green and Tim Fallowfield OBE, for their advice and challenge throughout the year to myself and my Executive Team, and for the assurance they provide to the Law Officers.

Finally, I would like to take this opportunity to thank all colleagues for their individual contributions to our achievements this year, and for their ongoing commitment to public service. I hope they will agree that our work is as rewarding as it is valuable to the government of the day and wider society. As we enter our tenth year as the Government Legal Department, I am confident that we will continue to support the government to govern well within the rule of law and go from a great to outstanding legal organisation.

Susanna McGibbon KC (Hon)
Treasury Solicitor and Permanent Secretary

Chair of the Board's Foreword

This has been my first full year as Lead Non-Executive and Chair of the GLD Board and Honours Committees, I chaired our inaugural Board Meeting in March 2024. My keenness to take on this role as GLD's first independent chair came from a huge respect for the Civil Service, built over many years and getting to know it well as First Civil Service Commissioner. My first impressions of GLD were that its people are highly committed public servants focused on ensuring the government has access to the best legal advice and services and I have continued to be impressed as the year continued.

The Board supports the strategic ambitions set out in the GLD Strategy 2024-27 and its role is to ensure that the organisation is clear on its direction of travel within that Strategy. It is the role of the Non-Executive Board Members to bring our external experience and insight into the organisation to help and shape progress of that Strategy, to hold the Chief Executive to account for its delivery, and to provide assurance to the Law Officers. Our knowledge and experience of the Civil Service, of the legal sector and beyond enables us to scrutinise, challenge, and offer advice to the GLD Executive Team, from the development of the GLD Budget and Business Plan, through to Spending Review proposals.

We have also played an active role in staff engagement throughout the year. I was delighted for example, to attend the All-Staff Conference in September, where I had the opportunity to meet many GLD colleagues. The biggest strategic challenge for me, I believe, is ensuring the department operates 'as one', with all staff feeling they contribute to the whole picture, providing coordinated advice to government, whilst understanding the work and challenges of individual client departments with which they are working.

In April, GLD celebrates its tenth anniversary. As well as taking time to look at how far it has come, this will also be a great opportunity for the organisation to consider what it can achieve going forwards, and how it might do that.

The long-term future of legal services to government continues to be considered by the Executive Team throughout the year. The team needs to pursue improvements in organisational agility and identity. We can be sure that the operational context will see demands for new types of legal services. This will require increased and different uses of technology



and data, as well as needing GLD to adapt its processes and systems and drive innovation and new skills into the delivery of its legal services.

We also know that cross-government collaboration is required to address challenges the UK is facing. The government's Plan for Change emphasises working beyond departmental boundaries. GLD's operating model, with teams embedded across government departments nationally, is uniquely designed and able to support this ambition at pace. This renewed focus on mission delivery has empowered the Board to challenge GLD to deliver greater impact, in the service of ambitious, cross-government milestones, demonstrating the value of its unique model.

On behalf of myself and my fellow Non-Executives, I would like to thank Susanna McGibbon and her Executive Team for their leadership of the organisation and all its people for the roles they hold and the extra mile they take in the delivery of their work. Thank you all for supporting the government to govern well within the rule of law.

The Rt Hon Dame Janet Paraskeva DBE PC
Chair of the Board

Performance Report

Performance Report

Performance Overview

Who we are

The Government Legal Department (GLD) is a non-ministerial government department and executive agency providing legal services to the majority of government departments and other publicly funded bodies in England and Wales.

We are currently one of the largest legal organisations in the country, with around 3,700 staff, of whom the majority (c2,900) are lawyers and paralegals based in 18 locations (including client sites).

Our responsibilities include:

- advising ministers and policymakers on domestic, public and private law, trade policy, international law and human rights
- providing litigation services to government departments and public bodies, covering public and private law issues
- drafting statutory instruments and other subordinate legislation
- preparing instructions for bills to be drafted by Parliamentary Counsel and advising ministers and policymakers during the passage of bills through Parliament
- providing legal services to support public inquiries
- advising the Cabinet Office (CO) and His Majesty's Treasury (HMT) on cross-Civil Service wide employment issues and policies, as well as dealing with individual employment issues, including in the Employment Tribunal
- supporting complex government procurement transactions and dispute resolution
- collecting, managing and disposing of bona vacantia (ownerless personal and corporate property and other assets) on behalf of the Crown's Nominee

We are led by the Treasury Solicitor and Permanent Secretary, Susanna McGibbon KC (Hon), and are sponsored by the Attorney General's Office (AGO). The Attorney General is the government's chief legal adviser and has a number of independent public interest functions, as well as overseeing the Law Officers' departments. The Law Officers are accountable to Parliament for the performance of GLD. GLD's governance structure is set out in the Governance Statement on page 33.

GLD also provides support to the Attorney General's Office and HM Crown Prosecution Service Inspectorate (HMCPSI), the independent inspectorate of the Crown Prosecution Service.

The financial statements at pages 64 to 78 relate to activity carried out by GLD in the year 2024-25 and are prepared under a direction issued by HMT, in accordance with Section 7(2) of the Government Resources and Accounts Act 2000.



Case Study: The Leasehold and Freehold Reform Act 2024

The Leasehold and Freehold Reform Act 2024 enacted Law Commission recommendations to make leasehold enfranchisement easier and cheaper for leaseholders, to strengthen rights and protections for leaseholders and residents on managed freehold estates, and to ban the sale of leasehold houses. As well as dealing with the complex underlying legal framework, Ministry of Housing, Communities and Local Government (MHCLG) Legal Advisers advised on the delicate balance of interests involved in shifting aspects of the framework to the benefit of leaseholders. During passage of the Bill, the scale of the reforms expanded significantly, while Parliamentary time was constrained. At Introduction, the Bill already comprised 65 clauses and 8 lengthy Schedules (totalling 140 pages). By Royal Assent, it had reached 125 clauses and 13 Schedules (totalling 257 pages). To deliver this, the team had to expand resource rapidly, bringing in secondees and triggering the GLD Rapid Response Team, while working alongside the Law Commission and private sector partners to deliver the necessary advice. When the General Election was called, the Bill appeared likely to fall, but was saved in last minute wash-up discussions. Over a dramatic and pressured 36 hours, the team worked at pace with Office of the Parliamentary Counsel (OPC), policy clients and the Centre to save the Bill, which was passed as the final Act of the previous Parliament.

Core Purpose and Vision

We help the government to govern well, within the rule of law.

Our vision is to be:

- An outstanding legal organisation, committed to the highest standards of service and professionalism; and
- A brilliant place to work, where we can all thrive and fulfil our potential.

GLD Strategy 2024-2027

In February 2024 we launched our GLD strategy for 2024-27. Our strategy sets out a clear and ambitious vision for how we will deliver and develop as a department, enhancing our support to the Law Officers as the government's trusted legal advisers.

Over 2024-25 we have continued to make progress to deliver our strategy, realising our vision of being an outstanding legal organisation committed to the highest standards of service and professionalism which delivers much more than law. Our strategy sets out three overarching strategic ambitions which align to the Civil Service Change Priorities.

Our three strategic ambitions are:

Becoming A National GLD

We are a vibrant, inclusive, and integrated GLD that is influential and respected in government and beyond. Our state-of-the-art offices are equipped to enable all colleagues, at all levels, to work closely together and contribute to our success. In all our locations, we reflect the communities we serve and are recognised as leaders in the legal community.

Rewarding Careers for All

Colleagues across GLD clearly understand how they contribute to our Purpose, Vision and Values. As a result, they feel valued and respected. A clear and accessible career pathway supports colleagues to progress within their chosen professions and specialisms. We attract and retain sufficient talent across many Civil Service professions including the law, maintain our high standards and provide colleagues with an attractive work-life balance in a diverse and inclusive community.

Environment Fit for the Future

We are a modern, sustainable and innovative GLD, equipped to respond to a rapidly changing world. We embrace the opportunities of technology to streamline our processes and deliver excellent legal services in a high-quality working environment. We are committed to continuous improvement ensuring outstanding value for money for the taxpayer.

Looking back on 2024-25 (Business Plan 2024-25)

Our Business Plan 2024-25 featured the legal priorities we anticipated delivering and identified key corporate activities that would deliver against our Strategy 2024-27 and wider Civil Service priorities. Throughout the year we continued efforts towards realising our Vision to be an outstanding legal organisation, committed to the highest standards of service and professionalism.

Our Business Plan acknowledged we were in a General Election year and would need to be sufficiently agile to respond to its outcome. Irrespective of the outcome, our Purpose, to help the government govern well, within the rule of law, remained constant. Equally, our Values of respect for each other, pride in our high standards of service and willingness to embrace ideas and collaboration, remained unchanged, and supported us to deliver through the pre-election period and transition between governments.

We adjusted our legal priorities after the General Election, and, to reflect this, we published a ‘mid-year update’ to our Business Plan in December, following the release of the government’s Plan for Change.

Below we set out some of our key achievements during the 2024-25 financial year, describing our legal delivery against the government’s Plan for Change and our activities to deliver against our GLD Strategy 2024-27 and wider Civil Service ambitions.

Notable Key Achievements – Legal and Strategic delivery – over the financial year 2024-25
<p>Quarter One (April – June)</p> <ul style="list-style-type: none">• Legislation that received Royal Assent as part of parliamentary wash-up in May: The Victims and Prisoners Act, the Post Office (Horizon System) Offences Act, the Leasehold and Freehold Reform Act and the Digital Markets, Competition and Consumers Act.• We advised on the formalities of the pre-election period of sensitivity, as well as several machinery of government changes.• We prepared draft emergency legislation in the event of reaching critical prison capacity.• We delivered the second year pay uplift for our grade 6 and 7 lawyers that was agreed in our pay business case.
<p>Quarter Two (July-September)</p> <ul style="list-style-type: none">• Module 1 (Resilience and Preparedness) Covid Report, published.• Infected Blood Compensation Scheme, regulations laid.• The Budget Responsibility Act, which received Royal Assent.• The Great British Energy Bill, introduced.• The Terrorism (Protection of Premises) Bill and the Renters’ Rights Bill, introduced.• We held our All Staff Conference, with over 1,500 colleagues attending over the course of the day.• We developed the ‘Departmental Leadership Group’ (DLG) programme to build high performance leadership capability at our most senior levels.
<p>Quarter Three (October – December)</p> <ul style="list-style-type: none">• The Passenger Railways Services (Public Ownership) Act which received Royal Assent.• The Data (Use and Access) Bill, and the Employment Rights Bill, introduced.• The Children’s Wellbeing and Schools Bill, and the Institute for Apprenticeships and Technical Education (Transfer of Functions etc.) Bill, introduced.• The Tobacco and Vapes Bill and the Mental Health Bill introduced.• Agreed to retain our central London footprint until late 2028.• Delivered the 2024-25 pay award for colleagues who were not covered by our legal pay business case.• Established a new Legal Operations Directorate within the Chief Operating Officer’s Group.

Notable Key Achievements – Legal and Strategic delivery – over the financial year 2024-25

Quarter Four (January – March)

- The Border Security, Asylum and Immigration Bill, introduced.
- Infected Blood Compensation Scheme Regulations 2025 made
- Crime and Policing Bill introduced
- Established a new directorate, the EU Relations Legal Advisers, to support the Minister for EU Relations and the European and Global Issues Secretariat in the Cabinet Office.
- Published our People Strategy 25-28.
- Launched the Legal Panel for Government invitation to tender.
- Updated our Legal Learning Framework.
- Offered a diverse range of development opportunities through our early talent schemes and delivered a range of internships.
- Developed legal and cross-functional professional career pathways.
- Launched the Counsel Diversity Project to further diversity and inclusion by supporting and promoting use of counsel from a diverse range of backgrounds.

More information on our performance can be found in the 'Performance Analysis' section.

Case Study: Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)



In December 2024, the UK acceded to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). This is a free trade agreement that spans 12 economies across Asia, the Americas, and now Europe with the UK as a party. GLD lawyers across multiple government departments supported negotiations with the CPTPP parties to agree how the UK would join the free trade agreement. This involved navigating the complexities of international trade law, and also attending negotiations both online, across several time zones, and in person, in international locations including Australia, Japan and Vietnam. GLD Lawyers drafted legislation to ensure that the UK's law would comply with the terms of CPTPP when the UK became a party. We supported departmental colleagues throughout the Parliamentary processes required to pass that legislation. The UK's accession to CPTPP was a true example of cross-government collaboration to ensure the best outcomes for the UK, and GLD lawyers were involved each step of the way. This collaboration continues at pace with the announcement in November 2024 that the CPTPP parties have established an Accession Working Group to progress Costa Rica's application to join CPTPP.

What we do

Our principal activities are delivered as follows:

Legal Divisions:

Advisory - GLD has expert advisory teams specialising in the work of their client departments, providing risk-based and solution-focused legal advice. GLD lawyers are crucial throughout the lifecycle of government policy. They advise on and draft legislation and work to take it through Parliament; advising departments and ministers on the legal implications of government policy and ensuring it stands up to Parliamentary scrutiny.

Litigation - GLD's Litigation Group is comprised of 4 divisions: Defence and Security, Home Office and Immigration, Justice and Development and the Covid Inquiry Team. Litigation lawyers handle high profile public and private law litigation for central government departments, security agencies and other public bodies; including UK military and security bodies. The divisions also undertake inquest, inquiry and injunctive work for GLD's clients. Our litigation teams are currently handling approximately 27,000 pieces of litigation.

Employment - As one of the largest employment law practices in the country, GLD's Employment Group advises on complex and fast-moving legal areas including: claims for unfair dismissal and relating to discrimination; pay issues; contractual issues and terms and conditions, and whistleblowing claims. The TUPE (Transfer of Undertakings Protection of Employment) and Transactional Hub provides specialist advice on employment and pensions issues to help manage employment-related risks, while the Industrial Hub advises on trade union matters and industrial action. The National Security Hub manages advice work and litigation claims requiring a knowledge of security vetting or the management of protected material.

Commercial - The Commercial Law Group provides expert advice on transactional, litigation, property and advisory commercial legal matters. Transactional and advisory teams advise government departments on their commercial work, ensuring value for money in the purchase of goods and services for the public sector. The Litigation and Dispute Resolution Team supports the government in high profile legal claims and saves taxpayer money by pursuing alternative forums (mediation, adjudication). The Property Hub provides strategic commercial property advice and supports government departments and agencies via training on property issues.

Statutory Instrument Hub - The Statutory Instrument (SI) Hub is GLD's specialist statutory instrument drafting service and Centre of Excellence for secondary legislation, with 30 lawyers drafting secondary legislation for all of GLD's client departments. The SI Hub Centre of Excellence makes a major contribution to helping lawyers across GLD improve the quality of their drafting, through its structured SI training programme, the annual SI conference and drafting guidance.

Chief Operating Officer Group:

The Chief Operating Officer (COO) Group is responsible for developing the department's strategy and plans and leading and coordinating programmes of activity across the department to deliver cost effective legal and support services that address the needs of our clients and staff.

The Finance, Operations and Digital Directorate covers finance, planning and performance, procurement, facilities management, security, digital and data, business assurance and resilience and records management services.

The Strategy, People and Culture Directorate covers human resources (HR), governance and strategy, business management, communications and engagement, and project delivery.

The Legal Operations Directorate includes: **Bona Vacantia Division**, on behalf of the Crown's Nominee, administers the estates of people who die intestate and without relatives entitled to inherit and collects the assets of dissolved companies and failed trusts in England, Wales and Northern Ireland, except in the Duchies of Cornwall and Lancaster. The costs of the division are recovered from the estates and assets it administers. The proceeds of bona vacantia are accounted for in the Crown's Nominee Accounts and separately notified to Parliament as prescribed in the Treasury Solicitor (Crown's Nominee) Rules 1997 (SI.1997/2870).

The Knowledge and Innovation Division lead on developing the department's integrated Legal Knowledge, Capability and Innovation Strategy, working with legal divisions to professionalise legal knowledge and learning activity and to develop innovative and flexible approaches to meeting client needs.

The Legal Delivery Division leads on building a future-fit legal environment through standardisation, automation, and innovative technologies, including AI. The division offer lawyers integrated support, flexible resourcing, and data-driven insights. Its focus is on efficiency, smart resource allocation, and continuous improvement to deliver high-quality legal services.

GLD also has 17 Centres of Excellence; formal networks of lawyers who have recognised expertise in an area of law or legal practice that has relevance across a number of GLD divisions and teams.

Case Study: Global Combat Air Programme



The Global Combat Air Programme (GCAP) is a strategic partnership between the governments of the UK, Italy and Japan to deliver a 6th generation combat aircraft in 2035, providing significant combat air capability well beyond that date. To facilitate the delivery of the programme, the partner nations agreed to form the “GCAP International Government Organisation” (GIGO) and base it in the UK. Ministry of Defence (MoD) Legal Advisers lawyers played an integral part in the tri-national negotiations and drafted and advised on both the Treaty text creating the GIGO and Implementing Arrangement setting out details on its operating structure and governance model. GLD lawyers also worked closely with Foreign, Commonwealth and Development Office (FCDO) lawyers to deliver secondary legislation to provide the GIGO with the key privileges and immunities it required as an International Organisation. To meet the programme timetable and remain on-track for the 2035 delivery date, and with representatives from each of the partner nations already starting to take up key roles within the organisation, GLD lawyers delivered the legal elements to this programme at considerable pace. The GIGO was fully established in December 2024.



Case Study: Russian sanctions litigation



In response to Russia's illegal invasion of Ukraine in 2022, the UK Government has introduced a comprehensive and unprecedented range of sanctions which have been carefully designed to increase pressure on Russia to desist its actions destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine. The response of the UK, in coordination with many international partners, is considered to be proportionate to the severity of Russia's invasion of Ukraine, which represents the most serious threat to European security and international order since the end of the Second World War.

GLD's Litigation Directorate has been dealing with a number of challenges relating to decisions made under the Russian sanctions regime and the government has not lost a challenge yet. Two cases were heard by the Supreme Court in January 2025, and judgment is now awaited. The case of *Shvidler v Secretary of State for Foreign, Commonwealth and Development Affairs* relates to the decision to maintain the designation of the Appellant, who is a US-British dual citizen and is designated for the purpose of an asset freeze, transport and trust services sanctions on the grounds of his association with Roman Abramovich and his previous position as a Non-Executive Director of Evraz plc. The case of *Dalston Projects Ltd & Others v Secretary of State for Transport* challenges the decision to detain a superyacht, "the Phi", which is valued at c.£38 million and is detained on the grounds that it is owned, controlled or operated by a person connected with Russia.

The Appellants in both cases rely on grounds relating to their rights under the European Convention of Human Rights, with both contending that the sanctions are a disproportionate interference with their right under Article 1 of the First Protocol to peaceful enjoyment of their possessions. Shvidler also contends that the restrictions imposed on him and his family by his designation constitute a disproportionate interference with his Article 8 right to private and family life. Shvidler and Dalston are the leading cases on the UK's autonomous sanctions regimes. Both cases were successfully defended by the government in the High Court and Court of Appeal. This will be the first time the Supreme Court has considered the UK's sanctions regime as established under the Sanctions and Anti-Money Laundering Act 2018.



How we are funded

We are funded almost entirely through the fees we charge clients for legal services. Approval to make capital investment and spend the income generated each year is obtained through the Parliamentary Supply process and allocated in the HM Procurator General and Treasury Solicitor Main Estimate. The following table provides a more detailed analysis of how we fund our work. As agreed with HMT, we do not seek to make a surplus, although accidental surpluses may arise. The charging regime for 2024-25 reflects the mutual relationship we have with our clients.

Group/Division	Funding
Advisory	Fixed fees. A small proportion of work is charged at hourly rates
Litigation	Primarily hourly rates to client departments. A small proportion of general public interest work is funded from the Parliamentary Estimate
Employment	A mix of fixed fees and hourly rates, depending on the nature of the work
Commercial	A mix of fixed fees and hourly rates, depending on the nature of the work
Bona Vacantia	Costs are funded from the proceeds of bona vacantia
Chief Operating Officer Group*	Recovered by the charges for our legal service to our clients

*Chief Operating Officer Group includes Finance, Operations and Digital, Strategy, People and Culture and the Legal Operations Directorates

Risk management

GLD risks are aligned with the risk categories in HM Treasury's risk management guidance – "The Orange Book". The risks were agreed by the GLD Board in December 2024. GLD's principal risks are:

- GLD does not deliver on its Health and Safety obligations caused by poor management leading to unsafe and unsuitable buildings or unsuitable equipment for staff.
- We do not prepare for significant external events which impact the delivery of legal services or cost recovery.
- We do not keep pace with emerging threats or a failure of compliance as a result of inappropriate awareness, culture and practice across personnel, physical and cyber security domains. Resulting in harm, or sanctions, or has an adverse impact on our ability to deliver legal services to our clients.
- We fail to provide IT tools on a consistent basis, impacting efficiency and productivity. Inadequate IT could impact Core Purpose and strategic vision delivery; staff morale and productivity; and service delivery.
- GLD could lose money due to fraud and error as a result of fraudulent staff, fraudulent suppliers or external fraudsters making fraudulent payments, changes to bank details, authorising fake invoices leading to inappropriate use of GLD assets, loss of assets, selling GLD data, or inappropriate use of GLD travel contracts.
- We do not generate sufficient income to achieve full cost recovery and/or we breach one of our HM Treasury Control Totals.
- We are unable to attract and retain sufficient legal and other professionals necessary to deliver against the demand for GLD's services.
- GLD fails to meet the demand for high quality, trusted and integrated legal services (utilising a combination of internal and external legal provision) at an acceptable cost to clients, leading to loss of confidence in GLD and undermining our role as the default provider of legal services to government.
- GLD's project to implement a Legal Practice Management (LPM) system is unsuccessful, does not deliver its anticipated benefits in full or significantly slips and not completed before the existing unsupported core operational Case Management System (CMS) fails (critical issue for GLD), adversely impacting legal service delivery and compliance, resulting in financial penalties, reduced productivity and reputational damage.
- The absence of a clear innovation strategy, well-defined innovation processes, and strong innovation capabilities - combined with the rapid development and wider availability of generative artificial (Gen AI) could obstruct future efforts to foster innovation and build an innovation-driven culture and result in missed opportunities for improved efficiencies in GLD.
- GLD's annual workforce planning process limits our understanding of medium to long term capability and capacity requirements for legal services across government, constraining medium-long term organisational (GLD) design and development. This could result in skills and capability gaps, a less effective workforce and inefficient deployment of GLD's capacity.

Our plans and mitigations in respect of these principal risks are set out in the Governance Statement on page 42.



Case Study:

Implementation of the Automated Vehicles Act 2024

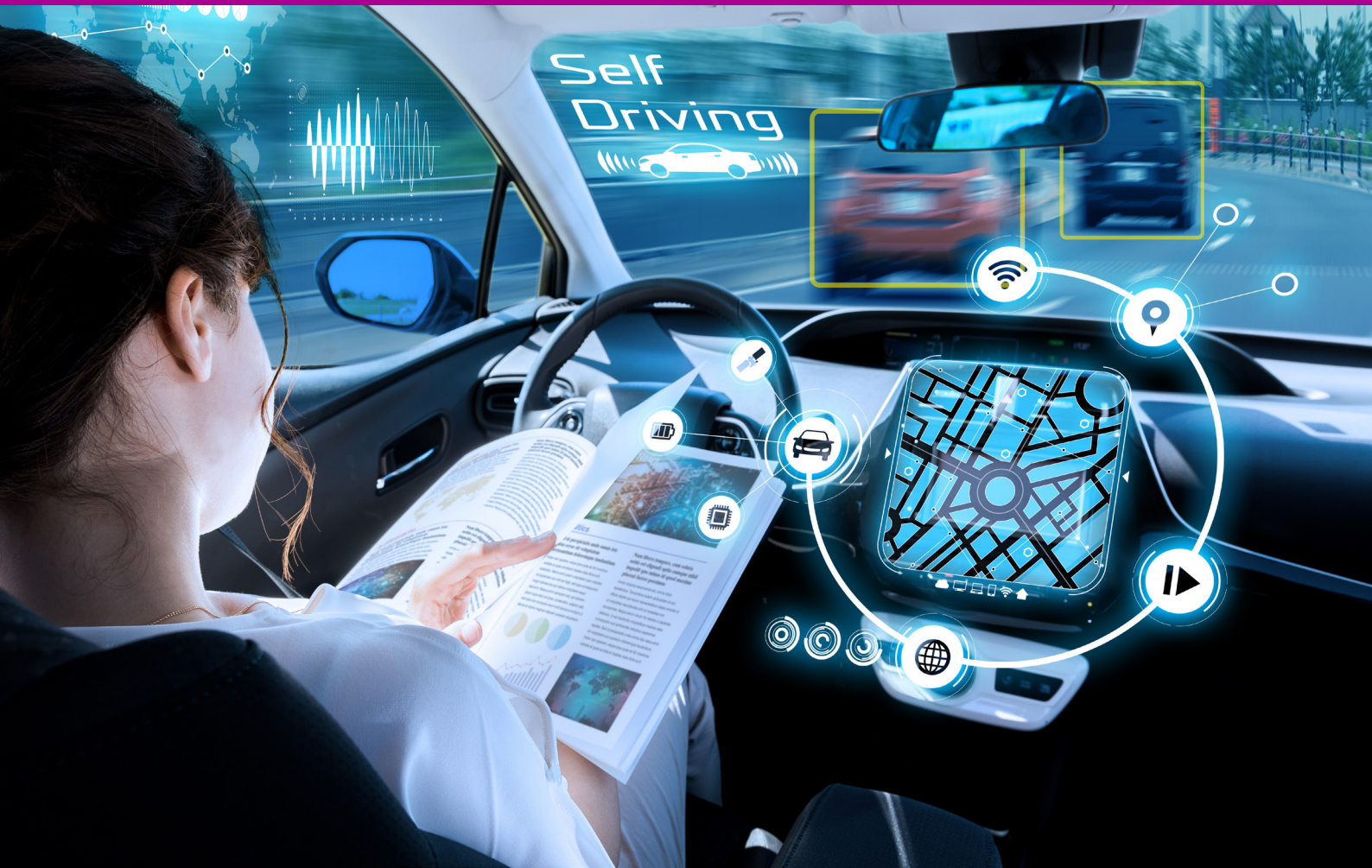
This project is a good example of the unique role the GLD has in the development of policy and the making of new laws.

The Automated Vehicles Act 2024 sets out legal responsibilities, establishes a safety framework and creates the necessary powers to regulate self-driving vehicles. GLD lawyers in Department for Transport supported ministers with the Bill's passage through Parliament so it could become the 2024 Act, and are now supporting ministers and the government's Centre for Connected and Autonomous Vehicles (CCAV) with the implementation of the 2024 Act.

The aim is to develop a regulatory framework that supports safe innovation and strengthens public confidence in self-driving vehicles.

GLD lawyers are helping ensure that policy proposals are consistent with the new framework of the 2024 Act. They are also making sure that planned public consultations ask suitable questions to help consultees respond in ways that will help inform the policy decisions. The topics covered in these consultations will include gathering information to inform a statement of safety principles which will be applied when the government decides whether to authorise a vehicle as a self-driving vehicle, and consulting on draft regulations to govern the more detailed aspects of the framework.

In advance of the full implementation of the 2024 Act, GLD lawyers are helping CCAV to develop options for ways to help advanced trials and early commercial pilots of self-driving vehicles. This programme of work draws on GLD lawyers' skills of working with policy experts to design policy and legislation for new technologies.



Looking to the future

Delivery of our Business Plan in 2025-26 will see us progress our strategic ambitions in the second year of our strategy (2024-27). We will build on our previous success expanding our national offices, strengthen our deployment of collaborative tools and technologies, and enhance both our leadership capabilities and offer to our people as we implement our new People Strategy. In developing our Business Plan for 2025-26, we have tested the scale of our ambition, and ensured our projects and initiatives will improve productivity and efficiency, supporting commitments made during Spending Review 2025. Below we have provided some illustrative examples of our projects and initiatives from our Business Plan 2025-26.

A National GLD

We will continue to increase our footprint outside of London as part of the government's Places for Growth programme. We will relocate our Bristol office as part of enabling our people to work effectively and efficiently from any location across a state-of-the art national estate. We will implement our External Relations Strategy and celebrate our 10-year anniversary, raising our profile as a national organisation with a common culture that attracts people by offering career opportunities across all our office locations.

Rewarding Careers for All

We will implement our People Strategy, focusing on collective leadership; diversity, inclusion and wellbeing; connection and engagement; learning and performance culture; and inclusive talent. We will continue to address capability and development needs, invest in high performance amongst our leaders and in early talent and improve our legal learning framework. Through these initiatives, we will attract and retain a diverse and inclusive workforce that embraces our organisation's Vision and Values. All will be able to reach their potential and succeed as experts in their chosen professions, making us an outstanding legal organisation.

Environment Fit for the Future

The evolution of our Chief Operating Officer Group will enhance the delivery of the services we offer. It will bring our teams closer together, identify efficiencies we can make, help us to evaluate and streamline our systems, and drive optimisation of our services through the adoption of new technology such as artificial intelligence. A key aim is to ensure that legal resource is optimised, that we exploit opportunities to improve how we deliver our services, and deliver efficiencies as per our commitments in the Spending Review.

Case Study: Public Authorities (Fraud, Error and Recovery) Bill



GLD Lawyers in Department for Work and Pensions Legal Advisers and Cabinet Office Legal Advisers worked together at pace through the Autumn and Winter of 2024 on the Public Authorities (Fraud, Error and Recovery) Bill, which was introduced into Parliament in January 2025. The Bill contains new powers for the Cabinet Office to tackle fraud across the public sector, including Covid-related fraud, and powers for DWP to combat fraud and error in the welfare system. The measures include information gathering and investigatory powers, debt recovery powers, the ability to impose civil penalties, and eligibility verification measures. The Bill is expected to save tax-payers over £1.5 billion over the next five years. It is anticipated that the Bill will complete its Parliamentary passage and gain Royal Assent by the summer recess.

Case Study: Post Office (Horizon Systems) Offences Bill

In 2024 the Department for Business and Trade Advisory division, working closely with colleagues in the Ministry of Justice Advisory division advised and instructed on the Post Office (Horizon Systems) Offences Bill. The Bill exonerated en bloc the postmasters who had fallen victim to the Horizon scandal and set up the legal process for expunging their convictions from police records. It also established a process for deleting formal cautions given to postmasters suspected of relevant offences. Public interest in the plight of the postmasters had intensified following the “Mr Bates versus the Post Office” drama broadcast on ITV in January. GLD lawyers actively influenced the framing of the Bill, including defining the categories of convictions and cautions within scope, the mechanism for quashing convictions, and devolution and procedural aspects. The Bill was constitutionally novel and sensitive as regards the separation of powers between government, Parliament and the courts, and GLD lawyers advised on the handling of these matters. The Bill passed all of its Parliamentary stages between 13 March and 23 May 2024, receiving Royal Assent the next day. The new Act removed a significant impediment to achieving justice for the postmasters and opened the way for compensation for many of them. Earlier, DBT advisory lawyers had instructed on the Post Office (Horizon System) Compensation Bill, which completed its Parliamentary stages between 29 November 2023 and 25 January 2024. That bill ensured that legal authority was available to the government for all compensation payments arising out of the Horizon scandal.

Case Study: Criminal Justice Act 1988 (Offensive Weapons) Order



Against the background of high levels of knife crime, the Home Office instructed lawyers in the Statutory Instrument (SI) Hub to draft regulations to ban zombie knives.

The desire to tackle violent crimes continued when the new Labour Government brought in its five missions, one of which was to "take back our streets". Ministers therefore decided to outlaw ninja swords as well. Regulations were drafted at pace to achieve this.

The Regulations made amendments to the Criminal Justice Act 1988 (Offensive Weapons) Order 1988 ("1988 Order"), which sets out descriptions of the weapons to which the offences in section 141 of the Criminal Justice Act 1988 apply. When a weapon is added to the 1988 Order, it becomes an offence to manufacture, sell, or import that weapon, and to possess that weapon in private.

One of the challenges in drafting both these sets of regulations was to define with sufficient precision the weapons to be banned. Another challenge was to make sure different stages of the scheme (the surrendering, compensation, and ban) would come into force stage by stage smoothly. The SI Hub lawyers rose to the challenge with enthusiasm and yet again demonstrated their expertise.

Case Study: Winter Fuel Payments

On 29 July 2024, the Chancellor of the Exchequer made a statement to Parliament to the effect that there was a £22 billion hole in the public finances, leading to difficult decisions to be taken by the government. The Secretary of State for Work and Pensions decided that only pensioners in receipt of pension credit or certain other means-tested benefits would continue to receive the winter fuel payment (an annual tax free payment of between £100 and £300 that was previously paid to everyone above state pension age).

Departmental lawyers worked with their policy colleagues at considerable pace to develop the policy and draft regulations. Complexities included whether the winter fuel payment would be payable in European Economic Area states and Switzerland and which means-tested benefits would lead to entitlement. Regulations were made and laid on 22 August, less than a month after the Chancellor's announcement.

Lawyers supported officials and the ministers when the regulations were debated in both Houses and then supported the operational teams implementing the policy. GLD Litigation lawyers are now supporting officials to defend the Regulations against two judicial review challenges in the High Court in England and Wales and the Court of Session in Scotland.

Performance Analysis

Performance measures

Our performance measures reflect our continued commitment to high professional standards as well as delivering client satisfaction, whilst recovering our operating costs in full by the year end.

Client satisfaction

To improve our client satisfaction rating

Client satisfaction rating	2024-25	2023-24
Percentage receiving Good or Excellent rating	95%	95%
Average score (Excellent: 10, Good: 5, Acceptable: 0, Poor: -5, Unacceptable: -10)	7.99	7.85

Our aim is to achieve a 95% or above rating in our annual survey of client satisfaction, and while 95% of our clients rated our services as Good or Excellent the percentage score was static. Using the average score, we scored 7.99, a 2% increase from last year. The survey has highlighted some issues that need to be addressed, and actions are being taken in response.

Lexcel

To maintain Lexcel accreditation

Lexcel is the Law Society's legal practice quality mark for practice management, compliance and client care, and GLD’s contentious teams have been Lexcel accredited since November 2006.

2024-25	Achieved
2023-24	Achieved

Our Litigation, Employment and Commercial Law Directorates were once again found to meet the requirements of the Lexcel Standard, after a full re-assessment by an independent external auditor, leading to reaccreditation by The Law Society. The Lexcel assessor concluded that “it remains very clear ... that in Lexcel terms, the organisation remains an extremely well run, and extremely well managed organisation.”

Recovery of operating costs

To recover from clients the full operating cost of chargeable services

2024-25	Achieved
2023-24	Achieved

We are primarily funded from the fees charged to clients for our legal services. Our fee rates are set in accordance with the HMT publication - Managing Public Money - and are designed to recover the costs incurred by the department. Financial performance is monitored throughout the year, and on a quarterly basis, we undertake a formal exercise to forecast the financial outturn for the year. Our commitment to our clients is to ensure that they benefit from better than budgeted financial performance and if the forecasting exercise at the end of quarter 2 predicts a significant surplus, we evaluate the underlying reasons, consider the financial risks for the remainder of the year and assess whether a fee reduction should be made in-year.

Full cost recovery was achieved in 2024-25 and, a surplus of £15m (2023-24: £8.3m) was generated after rebates of £12m. From this surplus £4m was set aside to fund additional capital requirements. In setting fees and budgets for the year, key factors include the level of litigation demand, the level of staff turnover, the level of investment required to deliver our objectives and the use of third parties to support our legal work. In determining these and other financial factors, we take account of the factors underlying the previous year's financial performance and the likelihood of them recurring. We also continually review and refine our fee setting and forecasting processes to minimise the level of surplus that may arise.

Delivery in 2024-25 against our strategic ambitions (2024-27)

Helping the government to govern well within the rule of law

With the announcement in May 2024 that a general election would be held on 4 July, our lawyers worked at exceptional pace to ensure that key bills were passed during parliamentary wash-up. These included the Victims and Prisoner Act, the Post (Office Horizon System) Offences Act, the Leasehold and Freehold Reform Act and the Digital Markets, Competition and Consumers Act.

We ably supported the government through the election period, providing the full range of legal services to support business-as-usual governance, specific legal questions related to the election, prorogation, the delivery of the election, and, subsequently, preparation for the new administration, supporting new ministers to understand the legal context in which they now work and the support we can provide.

We reset our legal priorities under the new administration, aligning to the Plan for Change. Throughout the year, we have supported the new legislative agenda, offered expert legal advice on complex issues and casework, and continued to support high-profile inquiries. The following table sets out legal delivery over the year at a high-level.

Missions	Achievements
	Our lawyers have supported the delivery of the Plan for Change by working and advising on:
Kickstart Economic Growth	<ul style="list-style-type: none">Legislation to promote financial stability and support economic growth. Including the Bank Resolution (Recapitalisation) Bill which was introduced in July 2024 and the Budget Responsibility Act, which created a ‘fiscal lock’ to impose duties on the Treasury and the Office for Budget Responsibility regarding announcements of fiscally significant measures. This Bill received Royal Assent in September 2024.The Employment Rights Bill, introduced in October 2024, which will update the legislative framework in relation to employment rights, and create the right conditions to allow sustainable economic growth.The Passenger Railways Services (Public Ownership) Act which received Royal Assent in November 2024. This Bill brings rail services into public ownership.Artificial Intelligence (AI), including the AI Opportunities Action Plan, published in January 2025, which sets out the government’s plan to harness AI, and the Data (Use and Access) Bill which was introduced October 2024.
Make Britain a clean energy superpower	<ul style="list-style-type: none">The Great British Energy Bill, introduced in July 2024. This will establish Great British Energy, a new publicly owned energy production company, which will deliver benefits to the UK. This includes facilitating clean energy deployment, job creation and boosting energy independence.The National Energy System Operator which went live in October 2024, projects and funding for Track 1 of the Carbon Capture Utilisation and Storage Programme (CCUS), and a new funding regime for long duration energy storage (LDES) and the smart metering implementation programme.
Safer Streets	<ul style="list-style-type: none">The Terrorism (Protection of Premises) Bill, introduced in September 2024 and also known as Martyn’s Law, which will ensure that certain premises and events are prepared to respond to a terrorist attack.The Border Security, Asylum and Immigration Bill, introduced in January 2025, which will develop a framework of powers and offences to strengthen the UK’s asylum and immigration system and improve border security.
Break down barriers to opportunity	<ul style="list-style-type: none">The Renters’ Rights Bill, introduced in September 2024, which will end Section 21 ‘no fault’ evictions and give greater rights and protections to people renting their homes.The Institute for Apprenticeships and Technical Education (Transfer of Functions etc.) Bill, which was introduced in October 2024. This Bill will transfer functions from the Institute for Apprenticeships and Technical Education (IfATE) to the Secretary of State and pave the way for the creation of Skills England.The Children’s Wellbeing and Schools Bill which was introduced in December 2024. This will make significant reforms to children’s social care and schools, by raising education standards and ensuring children are better protected.
Build an NHS fit for the future	<ul style="list-style-type: none">The Tobacco and Vapes Bill, will gradually phase out the sale of cigarettes, create powers to ban smoking in certain outdoor settings, and ban vape advertising and sponsorship. This Bill was introduced in November 2024.The Mental Health Bill, which was introduced in November 2024, will reform the detention and compulsory treatment regime.

Missions	Achievements
	Our lawyers have supported the delivery of the Plan for Change by working and advising on:
Other critical work	<ul style="list-style-type: none">Our lawyers worked at pace on legislation that received Royal Assent as part of parliamentary wash-up. This included: The Victims and Prisoners Act, the Post Office (Horizon System) Offences Act, the Leasehold and Freehold Reform Act and the Digital Markets, Competition and Consumers Act.We played a key role advising on the formalities of the pre-election period of sensitivity, as well as several machinery of government changes.We prepared draft emergency legislation and advised on non-legislative options in the event of reaching critical prison capacity.The Litigation Group worked and advised on the Module 1 (Resilience and Preparedness) Covid Report which was published in July 2024.Our Commercial Law Directorate helped over 1,800 Afghan Asylum seekers in the Ministry of Defence’s Afghan Relocation and Assistance Programme.Our Employment Directorate helped develop good employment policy, ensuring the workforce is managed in accordance with the law, including <i>Gilham v Ministry of Justice</i> on whistleblowing protections and <i>O’Brien v Ministry of Justice</i> on age discrimination in pensions.The SI Hub along with Cabinet Office legal advisors have been working on the Infected Blood Compensation Scheme, with regulations laid in August 2024 and March 2025.

Detailed accounts of legal work are set out in case studies throughout this report and illustrate the variety and complexity of the work we undertake.

The following commentary sets out 2024-25 performance in the first year of the GLD 2024-27 strategy.

A National GLD

We are continuing to ensure our workforce planning addresses the need for growth across national offices, while recognising the challenges associated with the distribution of the legal profession across the country. These include the location of the talent market and the proximity to the courts required for the delivery of some of GLD’s services. 15% of our workforce is now based outside London and we expect to see continued steady growth of our national estate occupation over the life of our Strategy.

Table showing full time equivalent staff (FTE) and where they are based, illustrating growth of our staff based nationally

Location	Quarter End					Percentage change on 23-24
	31/03/2024	30/06/2024	30/09/2024	31/12/2024	31/03/2025	
London	2,779	2,785	2,833	2,862	2,840	2%
National	383	425	472	488	516	35%

We launched our hybrid working policy in February 2024 with an implementation date of the start of April 2024. We expected that the policy would take time to embed and we are working to increase office attendance across our estate, with ongoing evaluation taking place.

Across our national offices each location has a nominated 'Head of Place'. These leaders work to bring people together across our geographical locations and a range of Civil Service professions, to embed GLD culture and values, share information and good practice and make our offices a great place to work. For example, across our national offices we have colleagues that take part in a variety of volunteering activities in the local community including organising foodbank collections, supporting young people with reading and leading education and outreach activities with local schools.

Our Bristol office relocation was delayed to the following financial year due to building safety issues outside of our control, but we expect to make progress on this in 2025-26. We have agreed to remain in our current London accommodation until at least 2028.

Rewarding Careers for All

We created a new 'Directors' Leadership Group' to focus on collective leadership and delivery of our strategy. We have reviewed and improved the governance of and approach to performance and talent management for our senior leadership cadre, in line with the wider Civil Service approach.

For the first time in over five years, we convened an all-staff conference, focused on emphasising the real-world impact of our work, celebrating our successes, hearing from the Attorney General and championing the unique role we play at the heart of government, upholding the rule of law.

GLD was at the forefront of launching a Government Legal Profession (GLP) Strategy in November 2024 which sets a clear direction for the profession. Collaboration and working even better together as a legal community, whilst developing knowledge-rich teams, will support us to achieve greater effectiveness and efficiencies whilst continuing to deliver excellent legal services to government. The GLP Strategy indicates our intention to enhance legal career pathways and improve diversity and inclusion across the legal sector.

Our staff engagement score increased to 64% in the 2024-25 Civil Service People Survey (up 3% from 2023-24).

Talent management is a key element of our strategic ambition to offer rewarding careers for all and this year we have ensured we offer a diverse range of high-quality development opportunities through our Early Talent schemes, including solicitor and graduate solicitor, trainee solicitor and pupillage places in addition to delivering a range of internship opportunities across all of our locations.

As the bridge between our corporate strategy and our people, we published our refreshed People Strategy 2025-28 in February 2025. The strategy sets out how we will continue to build the cultural capabilities and relationship between the organisation and its employees, and how we will attract, retain and develop the talent we need to succeed and continue to deliver much more than law. There are five ambitions within the People Strategy:

- Collective leadership;
- Diversity and inclusion and wellbeing;
- Connection and engagement;
- Learning and performance culture; and
- Inclusive talent.

We launched our strategic sourcing principles, setting out our approach to outsourcing legal work, in February 2025. The aim is to improve consistency across the organisation, ensuring we retain work in-house where we have the skills and capabilities to do so and outsourcing only when we do not. This helped to ensure our career offer is unique to attract and retain talented legal resource.

Environment Fit for the Future

We adjusted our organisational structure, creating a Legal Operations Directorate within our Chief Operating Officer's Group. This new directorate ensures that we are applying the right skills to the right work, with our corporate services enabling GLD lawyers to excel through seamless, innovative, and outcomes-focused support. As an organisation we will continue to make the best use of data, tools and technology to improve the effectiveness and efficiency of services underpinning legal delivery.

We will continue to ensure our business processes are as effective as they can be and deliver savings for the public purse by displacing externally-sourced legal services with in-house provision where it supports government's efficiency agenda.

In February 2025, we launched an Invitation to Tender for Legal Panel for Government contracts, with awards expected to be made in the 2025-26 financial year.

The focus of the cross-government One Big Thing initiative this year was innovation. This is a key ambition in our GLD strategy and important to our work, mindset and culture.

Around 1000 colleagues have participated in the Civil Service-wide Innovation Masterclass, designed to equip teams with foundational innovation skills. This initiative has prompted over 40 proposals across the organisation, ranging from scalable changes in everyday ways of working to improving legal processes. Furthermore, we will establish an Innovation Seed Fund and an innovation process in GLD, to embed both corporate and grassroots innovation into the organisation.

We are horizon scanning to understand what future demand for legal services may look like and the actions our organisation might need to take to address this. This will in time support preparations for our next strategy, from 2027.

We continue to develop key strategies that will enable us to exploit opportunities from technological advances: our Artificial Intelligence (AI), Innovation and Data strategies. The development of our Innovation strategy and data strategy and the launch of our AI Programme will lay the foundation for our programme of system improvements. We are keen to understand how we can use Generative AI (GenAI) to provide an even better legal service to the government. During 2024-25 our AI Programme has piloted GenAI-based tools, and investigating the possibilities for innovation, in line with the government's new AI Action Plan and the new AI Playbook.

We made significant progress in our priority to develop a new system to manage our legal services delivery. We concluded a discovery phase at the end of this year and developed a business case for a second Alpha phase of the project. Pending the results of the Alpha outcomes, we will then prepare a business case for the Beta stage of the project to implement a modern, digital Legal Practice Management system that complies with government digital standards and improves our service delivery through improved data management, processes and analytics across the organisation.

In support of our commitment to reduce emissions by 2030 and achieve net zero by 2050, GLD has this year signed the Greener Litigation Pledge. Greener Litigation is an initiative to reduce the environmental impact of dispute resolution and is a commitment to action by solicitors' firms, barristers' chambers and other disputes professionals. In support of this commitment, we have improved our internal data monitoring and introduced monitoring and holding to account panel law firms working on behalf of GLD.

Case Study: Launch of the Chief Operating Officer's Group

In 2024, we welcomed our new Chief Operating Officer (COO), joining the Executive Team and Board. This new Director General role was created to modernise and develop the organisation through the transformation of our corporate services and legal operations functions, ensuring we continue to offer the best legal services to government.

The COO Group is responsible for ensuring GLD uses the most modern corporate and operational service approaches – from the Civil Service and legal sector – to support the delivery of the department's strategy. It does this through the services, outcomes, partnerships and functions provided by and delivered through the Group which include ensuring GLD:

- Fulfils its statutory obligations
- Complies with its obligations to Parliament
- Has effective and efficient operational support underpinning its service, and
- Builds legal capability and shares knowledge.

A new Legal Operations Directorate was formed within the COO group, bringing together Legal Delivery, Bona Vacantia and Knowledge and Innovation divisions, with additional teams in scope for 2025-26.

Establishing the COO Group ensures that we have the leadership, organisational structures and culture across our national estate, investing in careers and development for all our cross-functional professionals. Recognising the value of corporate and operational services to the department enables us to support the department in fulfilling its purpose and achieve its vision of being both an outstanding legal organisation and a brilliant place to work.

Financial performance

Income

Total operating income (excluding disbursement income) for the year was £339.3m (2023-24: £298.3m), an increase of 14%. Our income from legal fees and charges to clients increased this year to reflect demand for our services and the increase in our fee rates due to inflationary pressures and the introduction of capability based pay for lawyers. Our other income includes income from secondments, subscriptions for the Legal Information Online Network (LION) and the recovery of the costs of administering bona vacantia from the Crown's Nominee.

Expenditure

Our administration costs (excluding disbursements) this year were £321.0m (2023-24: £285.7m), an increase of 12%. The majority of this increase was related to increased staff costs which reflects, in line with our strategy, increasing our resources so that we can undertake more of the government's legal work rather than it being delivered by external legal firms.

Staff costs represent 88% (2023-24: 87%) of non-disbursement expenditure and have increased by £32m in line with the increased demand for our legal services and pay inflation. The ratio of staff costs to legal fees and charges income is 85% (2023-24: 85%).

We continue to employ agency and contract staff where there is a need for specialist skills and where for business reasons the Board has agreed there should be a mixed economy of permanent and contract staff to provide some flexibility to cope with changes in demand. We also employ agency staff to support our resourcing where we do not have the permanent staff required to deliver our work. Spend this year was £26.8m (2023-24: £25.2m). Agency staff accounted for 10% of average staff costs for the year (2023-24: 10%).

Non-staff costs (excluding operational disbursements) have increased by 9% to £40.3m (2023-24: £37.1m). This increase mainly relates to increased accommodation costs.

Expenditure on legal disbursements varies from year to year depending on the number, type and complexity of cases. The majority of this expenditure is passed on directly to clients. The cost for 2024-25 was £57.1m (2023-24: £55.5m).

Net operating income

The net operating income for the year was £15.4m (2023-24: £8.3m) after rebates of £12m. The surplus has primarily been driven by higher than expected demand for litigation services which has resulted in increased resources and higher than expected chargeable hours per member of staff in the GLD Litigation Group.

Capital expenditure

Capital investment was £11.7m (2023-24: £4.5m) relating to investment in ICT equipment and infrastructure of £5.0m and additions made to leasehold right of use assets of £6.7m.

Financial position

Taxpayers' equity at 31 March 2025 is £22.0m (31 March 2024: £25.4m) comprising total assets of £108.2m (non-current assets of £29.3m, trade and other receivables of £53.5m and cash of £25.3m) and current and non-current liabilities of £86.2m (trade and other payables, lease liabilities and provisions). Further details are in the Notes to the Accounts. Cash flow and debtors are both closely monitored throughout the year to ensure that we have sufficient cash to meet our liabilities and pay our creditors promptly; we rely on receipts from our clients for our cash flow. We ended the year with cash of £25.3m (2023-24: £11.3m) and a trade receivables balance of £26.0m (2023-24: £31.9m).

The financial statements and notes are set out on pages 64 to 78.

Community and social matters

Our Pro Bono and Volunteering Network has continued to support and encourage pro bono and volunteering activity within GLD, including raising awareness of GLD's policy of allowing staff to spend 6 days a year undertaking volunteering activity (subject to business need).

We are members of the Attorney General's Pro Bono Committee and we have continued to develop our relationships with pro bono organisations, including through our regular support for Pro Bono Week which we promoted widely across GLD and hosted events to raise awareness of pro bono opportunities and the range of pro bono organisations.

GLD members have continued to engage in a wide range of volunteering activities either individually or with their GLD colleagues. This has included the Supreme Court debate days and supporting advice centres, as well as acting as school governors and charity trustees and undertaking many other very worthwhile charitable activities. This year for the first time we have nominated a number of people for the Pro Bono Recognition List, and we hope to continue to increase this number.

GLD's support for volunteering and pro bono work clearly has a positive impact on staff engagement and wellbeing, in addition to the benefits to society that it also brings; we continue to make efforts to expand our pro bono offer.

Sustainability

All departments are required to report their performance against the Greening Government Commitments (GGC) and to report on Task Force on Climate-related Financial Disclosures (TCFD). GLD's sustainability performance can be found at Annex A (page 79).

Susanna McGibbon KC (Hon)

Accounting Officer

4 July 2025

Accountability Report

Accountability Report

The Accountability Report includes a corporate governance report, a remuneration and staff report and a parliamentary accountability and audit report. These sections reflect financial reporting and parliamentary accountability reporting requirements.

Corporate Governance Report

Directors' Report

Directors

The Governance Statement includes the composition of the GLD Board on page 34.

Register of interests

No directorships or other significant interests, which may have caused a conflict with their management responsibilities, were held by any Board members. Note 16 to the Accounts includes related party interests identified.

Personal data related incidents

All government departments are required to publish information about any serious personal data related incidents, which have to be reported to the Information Commissioner. There was one personal data breach incident which was duly referred to the Information Commissioners Office for review in 2024-25.

Audit

GLD's Accounts are audited by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General. The NAO also audit the Crown's Nominee Accounts administered by the department's Bona Vacantia Division. The auditors provide no further assurance or other advisory services.

Remuneration to auditors for non-audit work

We did not pay any remuneration to the NAO for non-audit work. The notional audit fee for the GLD audit was £87k (2023-24: £84k).

Statement of Accounting Officer's Responsibilities

Under the Government Resources and Accounts Act 2000, HMT has directed GLD to prepare for each financial year a Statement of Accounts in the form and on the basis set out in the Accounts Direction.

The Accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of GLD and of its income and expenditure, Statement of Financial Position and cash flows for the financial year.

In preparing the Accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual, and in particular to:

- observe the Accounts Direction issued by HMT, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- make judgments 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; and
- confirm that the Annual Report and Accounts as a whole is fair, balanced and understandable and take personal responsibility for the Annual Report and Accounts and the judgments required for determining that it is fair, balanced and understandable

HMT has appointed the Treasury Solicitor and Chief Executive as Accounting Officer of GLD. The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding GLD's assets, are set out in Managing Public Money, published by HMT.

As Accounting Officer, I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that GLD’s auditors are aware of that information. As far as I am aware, there is no relevant audit information of which the auditors are unaware.

Governance Statement

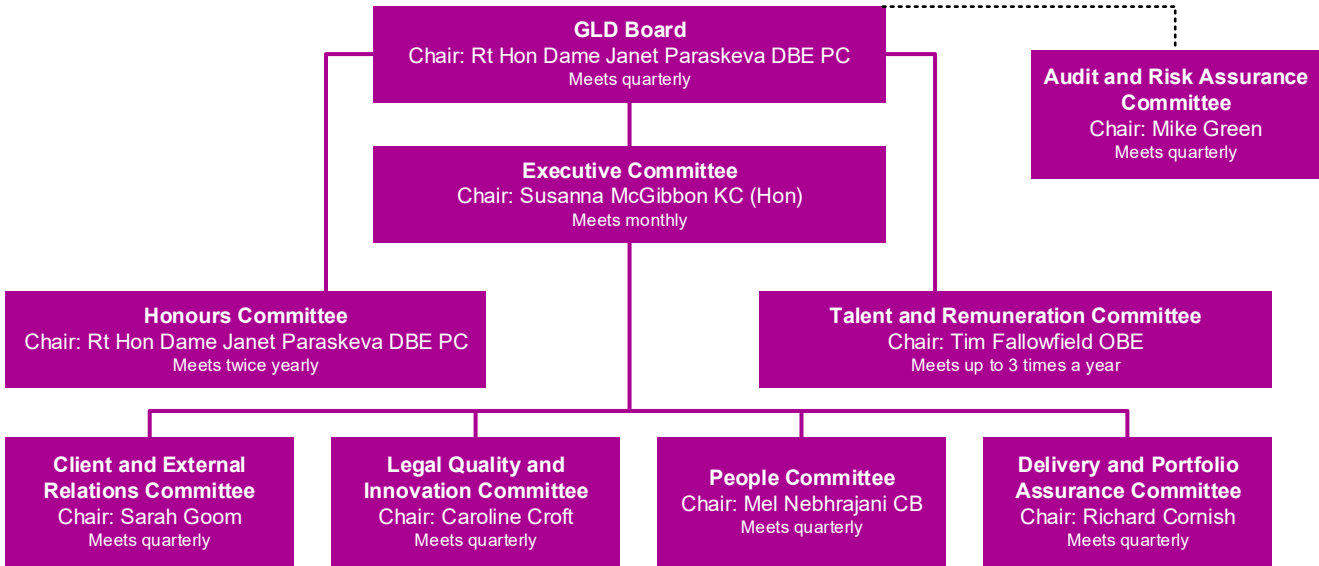
The Office of the Solicitor for the affairs of His Majesty’s Treasury (the Treasury Solicitor) was incorporated as a corporation sole by the Treasury Solicitor Act 1876.

The Government Legal Department is a non-ministerial department and was established as an Executive Agency on 1 April 1996. Ministerial oversight and accountability to Parliament lies with the Attorney General. HM Procurator General and Treasury Solicitor leads the department, in the roles of Permanent Secretary and Chief Executive.

The Treasury Solicitor is accountable to the Attorney General for the running of GLD; and as Chief Legal Adviser to government, the Attorney has a close interest in the legal advice and legal services being provided to government by GLD and the wider Government Legal Profession. An interim Framework Agreement governs the relationship between GLD and the Law Officers and the Attorney General’s Office.

GLD Board and sub-committees

The GLD Governance structure at the reporting period date is set out below:



GLD Board

Chair: The Rt Hon Dame Janet Paraskeva DBE PC, Lead Non-Executive Board Member

The Board is GLD’s collective strategic leadership group, comprised of Executives and Non-Executive members, and a representative from the Attorney General’s Office. It focuses on strategic matters for the department, setting the overall vision and strategic direction for the organisation, to ensure the delivery of GLD’s strategic aims and objectives through long-term business and financial planning, and the GLD 2024-27 Strategy (which sets the department’s priorities, current and future needs). It supports the Chair in providing leadership of strategic business matters, and oversight of the delivery of legal services as well as the performance and governance of the organisation. It also supports the Permanent Secretary and Treasury Solicitor in their role as Chief Executive and Accounting Officer of GLD, and in their accountability to the Attorney General. The Board operates collectively, holding the Executive to account for the leadership and outcomes of the department.

The Board is supported by the Board’s sub-committees which comprise of the Executive Committee, the Audit and Risk Assurance Committee, the Honours Committee, and the Talent and Renumeration Committee.

Changes made during the reporting period

Having established a new composition in March 2024 (via the recruitment of two Non-Executive Board Members in February 2024), one of which is the new independent Chair, the new Board construct is now advisory rather than decision-making, supported by its refreshed Terms of Reference and Board Operating Framework (the terms of reference for other committees in the governance structure are being updated to align and strengthen the structure). See Professionalisation of GLD’s Governance section below.

Committee Membership

Current committee membership is drawn from GLD's Executive (relevant to expertise), and Non-Executives. The Lead Non-Executive Board Member is independent Chair of the Board.

Board Members

Membership of the GLD Board from 1 April 2024 to 31 March 2025 was as follows:

Executive members:

Susanna McGibbon KC (Hon), Permanent Secretary, Treasury Solicitor and Chief Executive
Richard Cornish, Director General Chief Operating Officer
Carmel Thornton, Finance, Operations and Digital Director

Ex-officio member:

Douglas Wilson KC (Hon) OBE Director General, Attorney General's Office

Non-Executive Board Members:

The Rt Hon Dame Janet Paraskeva DBE PC
Mike Green
Tim Fallowfield OBE

Non-Executive Board Members

The Rt Hon Dame Janet Paraskeva DBE PC, Lead Non-Executive Board Member

Dame Janet was Chief Executive of the Law Society from 2000 to 2006, preparing it for the advent of the Legal Services Act 2007 by establishing separate regulatory functions for the SRA and the OLC.

She has since served as First Civil Service Commissioner, been an independent member of the Consumer Council for Water, a Non-Executive Director of the Serious and Organised Crime Agency, Chair of the Child Maintenance and Enforcement Commission, and Chair of the Appointments Commission for the States of Jersey. She also serves as a trustee of the charity Contemporary Applied Arts, as Vice Chair of the Games Rating Authority, Chair of Primary Eye Care Services, and is Chair of Council for Licenced Conveyancers, the Construction Skills Certification Scheme, and the Southern Co-op.

Dame Janet was made a Privy Councillor to assist in her role as a member of the Detainee Inquiry established by the Prime Minister in 2010.

Mike Green, Non-Executive Board Member

A Fellow of the Institute of Chartered Accountants in England and Wales and a graduate of the London School of Economics, Mike qualified as a chartered accountant with what is now KPMG and spent 11 years with the audit practice before a 20-year career in Commercial Television. He has held senior finance roles at TVS Television Limited and Carlton Communications plc and was involved in the Carlton/Granada merger which formed ITV plc. Following the merger, Mike moved to ITV and ultimately held the role of Deputy Group Finance Director. He also represented ITV on a number of joint venture boards in the UK and internationally.

Currently Mike is a Director, Audit Committee Chair and a member of the Service Quality Committee at Anchor Hanover, a housing association specialising in older people's housing and operating over 100 care homes. Mike is also a Trustee of the Royal Television Society, a charity advancing public education in the practice, technology, art, and science of television. He was also a Non-Executive on the Board and committees of an NHS Foundation Trust for 10 years.

Tim Fallowfield OBE, Non-Executive Board Member

Tim retired from Sainsbury's in 2024 having joined as Company Secretary and General Counsel in 2001 and being appointed to the Operating Board in September 2004. Tim was responsible for governance and risk management, leading the Corporate Services Division comprising Legal and Regulatory, Information Security and Cyber, Safety, Shareholder Services, Insurance and Central Security. He chaired the Group Safety Committee and the Data Governance Committee. Tim joined Sainsbury's from Exel plc, the global logistics company, where he was Company Secretary and Head of Legal Services. He began his career at the international law firm Clifford Chance and is a qualified solicitor.

Tim is a Trustee of Save the Children UK and Chair of the Sainsbury Archive. He chaired the Disability Confident Business Leaders Group between 2016-23 which works with government in shaping the disability employment agenda and in raising awareness of the benefits of employing disabled people. He was awarded an OBE for services to Disability Awareness in the 2020 New Year's Honours list.

Board attendance

The Board met 5 times 2024-25, (which included 4 formal meetings and 1 additional meeting in 2024, to endorse the 2023-24 GLD Annual Reports and Accounts), with attendance as follows:

Executive members	Eligible to attend	Attended (to end March)
Susanna McGibbon KC (Hon)	5	5
Carmel Thornton	5	4
Richard Cornish	5	4
Ex-officio member - Douglas Wilson KC (Hon) OBE	5	5
Non-executive members		
The Rt Hon Dame Janet Paraskeva DBE PC	5	5
Mike Green	5	5
Tim Fallowfield OBE	5	5

The Board's work covers the 5 main areas expected by the 2017 Corporate Governance in Central Government Departments: Code of Good Practice:

- Strategy – steering the department so that decision-making and strategic objectives are in line with the 2024-27 Strategy and that these are scrutinised, most especially by the external expertise and perspectives of the Non-Executive Board Members.
- Commercial focus – scrutinising the allocation of resources to achieve plans; ensuring controls are in place to manage Risk (receiving adequate assurance from the Audit and Risk Assurance Committee that effective controls are in place).
- Talented people – GLD has a People Strategy to help ensure that GLD has the capability to deliver and to meet current and future needs.
- Results focus/performance – the Board endorses the annual Business Plan and monitors and manages departmental performance against it.
- Management information – the Board receives quarterly performance and risk reporting, containing clear, consistent and comparable performance information.

Honours Committee

Chair: The Rt Hon Dame Janet Paraskeva DBE PC, GLD Lead Non-Executive Board Member

The Honours Committee is a new GLD Board sub-committee, responsible for reviewing nominations for National Honours for merit, exceptional achievement, or service. It oversees the nominations process for GLD employees for the King’s Birthday and New Year Honours; it also informs the formal submission and pipeline of GLD nominations to the Cabinet Office through moderation of nominations.

The Honours Committee reviews nominations of GLD employees for the State Honours Committee; and also has the ability to nominate for other Independent Honours Committees as appropriate.

The Honours Committee is also responsible for determining potential candidates for Royal Garden Party invites once a year and may also be also called upon to moderate Honorary King’s Counsel nominations as these arise. Lastly, the Committee is notified of any additional Honours awarded throughout the year which do not require moderation (for example, Imperial Service Medals). This is to promote these in line with the GLD 2024-27 Strategy and celebrate the great achievements of those at GLD.

The Honours Committee meets twice yearly and met one time in 2024-25 after its formation in November 2024.

Changes made during the reporting period

The Honours Committee was formed during the reporting period 2024-25 and had its first meeting in November 2024.

Honours Committee members

Membership of the Honours Committee from 27 November 2024 to 31 March 2025 and is as follows:

Executive members

Susanna McGibbon KC (Hon), Permanent Secretary and Chief Executive
Caroline Croft, Director General of Employment with Economic Recovery and UK Governance
Mel Nebhrajani CB, Director General of Litigation with Justice and Security

Sarah Goom, Director General of Commercial with Trade and International
Richard Cornish, Director General, Chief Operating Officer
Damian Paterson, Strategy, People and Culture Director

Non-Executive members
The Rt Hon Dame Janet Paraskeva DBE PC

Honours Committee Attendance

The Honours Committee met 1 time between November 2024 and March 2025, with attendance as follows:

Executive members	Eligible to attend	Attended (to end March)
Susanna McGibbon KC (Hon)	1	1
Caroline Croft	1	1
Mel Nebhrajani CB	1	1
Sarah Goom	1	1
Richard Cornish	1	1
Damian Paterson	1	1
Non-executive members		
The Rt Hon Dame Janet Paraskeva DBE PC	1	1

Talent and Remuneration Committee

Chair: Tim Fallowfield OBE, Non-Executive Board Member

The Talent and Remuneration Committee (TRC) is a new GLD Board sub-committee and is responsible for providing assurance relating to the support, investment, and recognition of GLD’s Senior Civil Servants (SCS). It oversees talent management and succession planning for our most senior cohort and business critical roles and nominations for high potential development interventions and programmes.

TRC is also responsible for overseeing and directing SCS pay and setting reward strategies that meet GLD’s business needs (in accordance with the SCS Practitioner Guidance) and monitoring the results to ensure compliance with diversity legislation, taking any appropriate action as necessary. This includes seeking assurance that due process has been undertaken relating to SCS performance to enable pay recommendations to be made to the Committee.

TRC meets three times per annum and met one time in the period 2024-25 since its formation (February 2025).

Changes made during the reporting period

The Talent and Remuneration Committee was formed during the reporting period 2024-25 and had its first meeting in February 2025.

Audit and Risk Assurance Committee

Chair: Mike Green, Non-Executive Board Member

The Audit and Risk Assurance Committee (ARAC) is a sub-committee of the GLD Board. It supports the Principal Accounting Officer by monitoring and reviewing the department's risk, control, and governance processes, as well as the associated assurance processes, including external and internal audit.

The Committee meets quarterly and convened four times in 2024-25. A private meeting with the external and internal auditors, without GLD colleagues present, was held before each meeting. The Committee consists of Non-Executive members and an independent member (Asif Bhatti) and is attended by executive and external and internal auditors.

The Committee oversaw the audit process and advised the Principal Accounting Officer on the financial integrity of three sets of accounts: Agency accounts, departmental accounts, and the Crown’s Nominee accounts for 2023-24, including the external auditors’ opinion. The Committee was satisfied with the quality of the external auditors’ work and their approach to their responsibilities. At its final meeting of 2024-25 the Committee reviewed the external auditors’ audit plans for the 31 March 2025 year end. For the financial year ending 31 March 2025, there was a change in audit arrangements, with the department’s external auditors, the NAO, bringing the GLD audits, which had previously been outsourced, in-house. The NAO have always had overall responsibility for the audits but

resourcing the audits in house was a change in delivery method. The risks associated with this change and proposed mitigations were discussed with the Committee.

ARAC continued its deep dive programme, which covered the Pay and Reward Modernisation Project Closure and the Legal Practice Management (LPM) Project to ensure proper visibility of the related risks and issues. The Committee also considered the findings contained in the Reports prepared by the Head of Internal Audit, based on an Internal Audit Plan agreed in advance by the Committee, and monitored the implementation of internal audit recommendations. Internal Audit also issued 3 management letters assessing the governance, risk and project management for LPM, which were discussed by the Committee.

The Committee received quarterly updates on the ongoing work on GLD’s Principal Risks, Risk Framework, and assurance map, and advised the Board on risk appetite in light of GLD’s new strategic plan. No new Raising a Concern: Whistleblowing incidents were reported throughout the year. Finally, as part of its remit, the Committee reviewed security matters twice a year, with specific attention to Cyber Security, incident reporting, and the application of policies and procedures relating to Health and Safety, along with an annual report on the application of the Business Appointment Rules. Additionally, it reviewed GLD’s position on fraud and noted the latest developments.

In line with the HM Treasury ARAC Handbook, the Committee reviewed its own effectiveness, as well as the effectiveness of the internal and external audit functions.

Changes made during the reporting period

From September 2024, the Director General Chief Operating Officer joined the Committee as a permanent attendee.

The Committee was quorate at each meeting. A breakdown of members’ attendance is shown below:

Audit and Risk Assurance Committee attendance

ARAC met 4 times between April 2024 and March 2025, with attendance as follows:

Non-executive members	Eligible to attend	Attended (to end March)
Mike Green	4	4
Tim Fallowfield OBE	4	3
Asif Bhatti (independent member)	4	4

Executive Committee

Chair: Susanna McGibbon KC (Hon), Permanent Secretary and Treasury Solicitor

The Executive Committee (ExCo) is a sub-committee of the GLD Board. It consists of GLD’s Executive colleagues. ExCo meets once a month, with additional exceptional meetings if required. ExCo oversees the operational delivery of all aspects of the business, monitors performance against GLD objectives and reviews and oversees departmental risk and other critical business issues. It leads, motivates and challenges the department. It supports the Board in delivering GLD’s Strategic Objectives and monitors and sets direction for the assurance committees reporting into it.

The Committee met 11 times in 2024-25. An annual business planning process, overseen by ExCo, sets the department’s priorities and resourcing for the year ahead. Over the past year some of the topics that ExCo have considered include the 2024-27 GLD Strategy; resourcing; performance reporting including Quarterly Performance Reports; 2025-28 People Strategy; Spending Review; Legal Operations Directorate; Principal Risk Register and Innovation and AI strategies.

ExCo is supported by 4 sub-committees: the Legal Quality and Innovation Committee (LQIC), Delivery and Project Assurance Committee (DPAC); Client and External Relations Committee (CERC) and People Committee (PC).

Changes made during the reporting period

None

Client and External Relations Committee

Chair: Sarah Goom, Legal Director General, Commercial with Trade and International

The Client and External Relations Committee (CERC) is an Executive Committee sub-committee that makes decisions, provides strategic direction, oversight and assurance for: (i) the conduct and effectiveness of GLD's client relationships; (ii) the procurement of external legal services for GLD's clients, as well as the quality, value for money and efficiency of those services; (iii) fostering cohesive relationships within the Government Legal Profession; and (iv) effective engagement with wider legal sector stakeholders including regulators, to support the delivery of our services and the Business Plan.

The Committee meets quarterly and met four times in 2024-25. Over the past year, the Committee has overseen a number of key initiatives. In relation to client care, CERC has overseen the development of a comprehensive Client Feedback System, including the refreshing of Client Deep Dives and Legal Project Reviews, as well as analysing the outcomes of the annual Client Satisfaction Survey.

In relation to GLD's external legal suppliers, the Committee oversaw the recommendation to increase panel counsel fees and closely monitored GLD's joint project with Crown Commercial Service to procure the new legal services framework agreement, the Legal Panel for Government.

Additionally, the Committee provided oversight and assurance in the delivery of the Government Legal Profession Strategy (up to the implementation stage) and agreed on the initial draft for the External Relations Strategy. Work on this strategy will continue into the next financial year.

As part of best practice, Governance undertook a light touch review of CERC in 2024-25. Any recommendations arising from the review will be considered and implemented as appropriate in 2025-26.

Changes made during the reporting period

The existing Diversity and Inclusion (D&I) members for this Committee were put in place for an additional one-year tenure.

Legal Quality and Innovation Committee

Chair: Caroline Croft, Legal Director General, Employment with Economic Recovery and UK Governance

The Legal Quality and Innovation Committee (LQIC) is an Executive Committee sub-committee and focuses on matters relating to the quality and effectiveness of our legal work and innovation in the delivery of GLD's legal services.

LQIC makes decisions and provides strategic direction, oversight, and assurance for the quality and effectiveness of GLD's legal services; the design, delivery, and effectiveness of legal knowledge resources, legal capability and training, and legal induction; and innovation in the delivery of legal services. The committee also oversees GLD's quality accreditation and recognition processes, such as Lexcel, and the legal quality and innovation priorities in our Business Plans.

LQIC's meets quarterly and met 4 times in 2024-25. Meetings are themed, so that each concentrate on a particular aspect of its remit. Key areas of assurance have included GLD's legislative work, our Centres of Excellence, the department's legal knowledge and learning systems, and GLD's evolving use of AI. Significant decisions taken during the year include approving a new process for Quality Assurance in advisory directorates, improvements to our legal induction and training and the initiation of a project to examine and improve GLD's expertise in drafting draft legislation.

As the Chief Operating Officer (COO) Group, and the Legal Operations Directorate have become established, the Committee has worked closely with these new parts of GLD to ensure that GLD has the expertise, tools and innovation to deliver first-class legal services ever more efficiently and effectively. The Committee has worked to ensure that the quality of the data that it receives to help it fulfil its remit continues to improve and has embedded data deep-dives into specific aspects of its remit during its meetings. This builds on a review of data led by the Chair during the last reporting period. In line with best practice, there was also a light-touch review of the Committee's governance arrangements. Any recommendations which emerge from the review will be considered and put into effect as appropriate in 2025-26.

Looking ahead, LQIC will continue to monitor, assure and support the implementation of strategic initiatives, ensuring that GLD remains at the forefront of legal excellence and innovation.

Changes during the reporting period

Daniel Denman (Legal Director and GLD Knowledge Champion) left the Committee in December 2024 when he left the organisation. He will be replaced by the new GLD Knowledge Champion. The existing D&I members for this Committee were put in place for an additional one-year tenure.

People Committee

Chair: Mel Nebhrajani CB, Legal Director General, Litigation with Justice and Security

The People Committee (PC) is an Executive Committee sub-committee and oversees the organisation's People Strategy and related policies. The PC reviews key workforce metrics, risks, and actions, particularly in legal resourcing, capacity, capability, and pay and reward. It also monitors the effectiveness and wellbeing of employees and diversity and inclusion, supporting leadership initiatives across legal and corporate services. Committee decisions are based on a range of data that includes responses to the People Survey.

The PC meets quarterly, with additional meetings if required, and met 4 times in 2024-25. Over the past year, the PC has driven critical work, including refreshing the GLD's 2025-28 People Strategy, reviewing changes to capability-based pay, and transforming recruitment strategies. Members also discussed developments for internal legal career pathways. PC also welcomed and considered the twice-yearly Health and Wellbeing Report, which helps members monitor and identify risks related to activities within its remit. This Report is also shared with the GLD Board for assurance. The committee regularly discusses key data trends and assess the relevance of the metrics considered.

In line with the GLD Board's ongoing commitment to increasing diversity in GLD's decision making bodies, SCS and delegated grade Diversity and Inclusion members have remained a staple of the committee's membership. The current D&I members were put in place from April 2024 and have a one-year tenure.

In line with best practice, there was also a light-touch review of the Committee's governance arrangements. Any recommendations which emerge from the review will be considered and put into effect as appropriate in 2025-26.

Changes made during the reporting period:

None

Delivery and Portfolio Assurance Committee

Chair: Richard Cornish, Director General Chief Operating Officer

The Delivery and Portfolio Assurance Committee (DPAC) is an Executive Committee sub-committee and plays a critical role in ensuring the implementation of GLD's key priorities as defined in the annual Business Plan and the Strategic Objectives outlined in the GLD 2024-2027 Strategy. Established in mid-2024, DPAC enhances assurance and reporting on the Department's strategic effectiveness.

DPAC's focus is on a transformational agenda for GLD's corporate services and legal operations functions and a mission to drive forward key departmental projects and initiatives.

DPAC meets quarterly and had 4 meetings in 2024-25. Its inaugural meeting involved the review and of its Terms of Reference, including definition of roles, and responsibilities. Key discussions included processes for commissioning and monitoring the Business Plan Delivery Report and approaches to in-year changes to the Business Plan with a focus on a Change Assessment Gateway which sets out a framework and process for deciding whether to add a new project or initiative as an in-year priority for the Business Plan. DPAC oversees multiple departmental performance metrics, aiming to consolidate these into a unified product and monitoring business plan projects, initiatives and metrics for success measures.

Subsequent meetings have focused on reviewing the GLD Business Plan Delivery Report, establishing baseline milestones, and considering change control procedures. Significant areas of deliberation have included IT resilience with an examination of the work undertaken by GLD's Information, Governance, and Digital and Data teams to enhance the department's IT infrastructure, the management of security information risk as well as risk management related to business planning.

Future agenda items will include addressing identified risks and challenges with dedicated deep dive sessions. The Committee will continue focusing on key projects such as the Legal Practice Management project, with regular reviews.

Changes made during the reporting period

The committee will be recruiting two new Diversity and Inclusion members to align with best practice across GLD's governance committees, and in parallel with a review of the membership of all the committees. Following a review of the previous Investment and Portfolio Assurance Committee (IPAC) circa a year after its creation, a decision was reached by the Executive Committee to establish DPAC to replace IPAC, as part of the changes in how the department plans and monitors the delivery of the Business Plan, and a renewed focus on the importance of the project profession. The review found that there was a continued need to monitor the capacity of the business to both implement and receive change, and the original design and purpose of IPAC did not align with the volume and nature of projects within GLD required to deliver our Strategy year on year. See also Professionalisation of GLD's Governance section below.

Professionalisation of GLD's governance

The department continues to align and enhance its governance, delivery and accountability arrangements, in line with the 2024-27 Strategy and current Business Plan, following the new Board composition in March 2024 and the appointment of a DG Chief Operating Officer.

Recognising that to achieve the department's ambition of being an environment fit for the future, the department's structures and processes need to be responsive and adaptive; as such the Board's supporting documents have been updated, which the rest of the governance structure will align to, including the two new Board sub-committees, that were agreed by the Executive Committee and the GLD Board in June 2024 (Talent and Remuneration Committee, and Honours Committee).

The Talent and Remuneration Committee merged two former HR-led committees (Talent and Succession and SCS Pay Committees) as part of increasing GLD support, investment and recognition of GLD's Senior Civil Servants (SCS). It oversees the SCS remuneration and pay strategy decisions within the SCS pay envelope set centrally by the Cabinet Office. It also oversees talent management and succession planning for GLD's most senior cohort and business critical roles and nominations for high potential development interventions and programmes. The Honours Committee increases the transparency and utility of nominations for State or Legal Honours as part of GLD's reward and recognition strategy.

The Governance Team is also undertaking light touch reviews of three of the Executive Committee sub-committees (Client and External Relations Committee, Legal Quality and Assurance Committee and People Committee). These reviews aim to ensure that the sub-committees are functioning effectively, in line with best practice and are aligned by formal and professional processes. The recommendations will be discussed and implemented during this coming financial year.

During the financial year, the Shadow Board was dissolved, recognising that the GLD Board is advisory. The Shadow Board was part of GLD's informal governance; an advisory staff forum which acted as a feedback mechanism to the Board. To ensure staff feedback remains part of decision making within GLD, committee papers for the Executive Committee and its sub-committees are shared with senior colleagues across the organisation, to feed in their comments. The team also continues to enhance the committee observer scheme and promote staff engagement sessions with Board members (at all GLD National locations, on a rotating basis).

The contribution of Non-Executives' external public and private sector expertise is an integral part of amplifying the impact of the strategic changes made to-date, and their ongoing contributions should provide better engagement, quality, outcomes, ultimately benefitting the delivery of our legal services.

The GLD Board's performance

GLD adheres to centrally set standards of good governance practice for government departmental boards and follows the Board Effectiveness Evaluation process, where possible, recommended in guidance produced by the Cabinet Office. The evaluation of the Board this year considered the effectiveness of the group under the following headings:

- Board Members' personal evaluation
- Governance arrangements
- The work of the Board
- Composition and culture
- Support and organisation
- Progress and impact

The recommendations will be discussed and implemented during this coming financial year. Progress on the recommendations from the previous evaluation was reviewed during the reporting year and implementation made by 31 March 2025.

As aforementioned, in line with recent changes to the governance structure, the Board Terms of Reference and the Board Operating Framework has been redrafted, (the terms of reference for other committees in the governance structure are being updated as part of the Committee Review work to align).

Compliance with the Corporate Governance in Central Government Departments: Code of Good Practice

The Corporate Governance in Central Government Departments: Code of Good Practice applies primarily to ministerial departments. This means that the key provisions relating to the composition of Boards do not apply to GLD; specifically, the involvement of ministers and the requirement to have roughly equal numbers of ministers, senior civil servants, and non-executive directors.

Management of interests and business appointments

GLD has a policy, published in our Staff Handbook, on outside activities and employment. The general principles are that official time must not be spent on any outside activity without the approval of the Head of Division. Individuals must not engage in any outside activity, which would in any way tend to impair their effectiveness in their official duties or be inconsistent with their position as civil servants, or as members of GLD.

No member of staff may carry out private legal work except, and subject to permission of the Treasury Solicitor, in relation to non-contentious family matters, or pro bono work.

Individuals must seek permission from the Head of HR, via a senior manager in their business area, to ensure there is no risk in respect of conflict of interest with, or potential damage to the credibility of, GLD before:

- taking any job or position, which might affect their official work directly or indirectly; or
- undertaking any outside work involving official information; or
- undertaking any work involving payment by another government department or agency on their own account.

Where permission is granted the relevant documentation is filed in the individual's personnel folder.

There are strict rules in place for those responsible for procurement or management of contracts and on an annual basis all directors are asked to complete a Declaration of Related Party Interests.

We have a policy on business interests and shareholdings, also published in our Staff Handbook. This states that there is no objection to civil servants investing in shareholdings unless the nature of their work is such as to require constraints on this. Individuals must not be involved in any work, which could affect the value of their private investments, or the value of those on which they give advice to others; nor must staff use information acquired in the course of their work to advance their private financial interests or those of others.

Individuals must declare to the Finance, Operations and Digital Director any business interests or shareholdings (including directorships) which they or members of their immediate family (spouse/partner and children) hold - to the extent to which they are aware of them - which they would be able to further as a result of their official position. They must comply with any subsequent instructions from the Finance, Operations and Digital Director regarding the retention, disposal or management of such holdings.

In line with Cabinet Office guidance, GLD will ensure that:

- All senior civil servants are required to routinely declare any relevant interests to the Permanent Secretary. This will include providing a 'nil return' should they have no relevant outside interests.
- Senior civil servants continue to declare any outside interests on appointment, or if their circumstances change, in real time.
- These returns are scrutinised within GLD by the Audit and Risk Assurance Committee, with assurance of this process set out in the Annual Report and Accounts, and a return is provided to the Cabinet Office, providing assurance that all outside interests are being managed appropriately.
- As part of or alongside our Annual Report and Accounts we will publish a register of relevant interests for all members of the Departmental Board, including senior civil servants.
- When a civil servant is appointed, as part of the recruitment process the hiring manager is satisfied they can comply with the requirements of the Civil Service Code. The individual must ensure that any interests they do have are compliant with their obligations as a civil servant. If their employer considers there is any real or perceived conflict from their outside interests, the individual must resolve that conflict - for example, by giving up any outside employment.
- After a civil servant is appointed, they declare relevant private interests in real time to their line manager and, if necessary, senior management. They will be required to comply with any instructions from GLD relating to those interests. They will also be required to seek permission before taking up any outside engagement which might affect their work.

Business appointments

The Audit and Risk Assurance Committee monitor compliance with the Business Appointment Rules, receiving an annual report from HR.

In compliance with Business Appointment Rules, the department is transparent in the advice given to individual applications for senior staff, including special advisers. A summary of advice given is published at: <https://www.gov.uk/government/publications/ago-gld-and-hmcpsi-business-appointment-rules>.

In 2024-25 there were 14 exits from the Senior Civil Service (SCS). No BAR applications were submitted to the department from SCS or from staff members at delegated grades. There were no breaches of rules in the preceding year.

Risk management

Risk management practices comply with the requirements of the Orange Book's (HM Treasury risk management guidance) Main Principles. Our principal risks are also aligned to the risk categories in the Orange Book.

The ARAC provides a challenge function to the department's risk management arrangements, including deep dive reviews, internal audit reviews and the assurance of processes.

Risk management is embedded at every level in the department by encouraging empowerment and delegation so that risks can be managed proactively by those with the local knowledge and experience, and who are held accountable for the effective management of those risks. The process is to identify and evaluate a risk, determine an appropriate response, and actively manage the response to ensure that GLD's exposure is limited to an acceptable level.

Principal risks are agreed by the GLD Board and monitored by the ARAC, and each key strategic risk is owned by an Executive Committee member. The risks and actions to mitigate them are reported quarterly to the Executive Committee and the Board. The principal risks and the actions to mitigate them are detailed in the GLD business plan.

Risk profile

GLD's key principal risks and mitigating actions are:

Risk Category	Risk Description	Rating	Plans and Mitigations
Property	GLD does not deliver on its Health and Safety obligations caused by poor management leading to unsafe and unsuitable buildings or unsuitable equipment for staff.	4 - Green	A robust management plan is in place, which includes regular health and safety liaison with our public sector landlords, to ensure that GLD's legal responsibilities are met through risk assessment and safety awareness management. Competent persons are in place to deliver these and GLD has set up a Health and Wellbeing Group to oversee health, safety, and wellbeing within GLD. GLD engages with landlords through building house and safety committees.
Business Continuity	We do not prepare for significant external events which impact the delivery of legal services or cost recovery.	4 - Green	GLD has a robust command and control structure to manage disruption to the delivery of GLD services; which is overseen by the GLD Incident Management Team; this takes into consideration the disparate locations of staff and the specific requirements of business areas; these plans are reviewed annually and tested to ensure that they are effective and would minimise the impact of disruption on GLD business operations.
Security	We do not keep pace with emerging threats or a failure of compliance as a result of inappropriate awareness, culture and practice across personnel, physical and cyber security domains. Resulting in harm, or sanctions, or has an adverse impact on our ability to deliver legal services to our clients.	6 - Amber	We comply with the requirements of our Information Security Management System, as well as GovSoo7 Functional Standard and Minimum-Security Standards across all security functions (Physical, Personnel, Cyber and Technical). We ensure all staff are appropriately security cleared and communicate securely with counsel and other third parties. All staff complete the mandatory annual 'Security and Data Protection' training. There is also Security Education and Awareness training products available on GLD's Learning Management System (LMS). Assurance is obtained through maintaining various cyber related certifications and accreditations, such as the ISO27001, Cyber Assessment Framework (CAF) and Government Cryptographic Standards (IS4). This allows us to provide and support secure IT equipment and services to the National Security team, amongst others. We have IT solutions to identify, protect and respond to cyber-attacks.
Technology	We fail to provide IT tools on a consistent basis, impacting efficiency and productivity. Inadequate IT could impact Core Purpose and strategic vision delivery; staff morale and productivity; service delivery.	6 - Amber	The availability of GLD systems has been consistently high with office, hybrid and remote working capability shown to be effective. Our primary concern is the pending obsolescence of our core Case Management System (CMS) which is currently in the process of being replaced with a more contemporary digital product. A secondary concern is the ongoing challenge of interoperability between client and GLD systems and wider government systems enabling greater collaboration and/or knowledge sharing between teams, which is reducing as the wider government interoperability strategy and standards are adopted which GLD is at the forefront of. There have been no significant IT systems disruptions for an extended period indicating the ongoing system improvements work has been effective, although we are continuing to monitor user performance and continue the systems improvement, and resiliency works.
Operations	GLD could lose money due to fraud and error as a result of fraudulent staff, fraudulent suppliers or external fraudsters making fraudulent payments, changes to bank details, authorising fake invoices leading to inappropriate use of GLD assets, loss of assets, selling GLD data, inappropriate use of GLD travel contracts.	4 - Green	Our systems are designed to minimise this risk, we review the risk of fraud annually and where incidents of potential fraud and theft occur, we review our systems and strengthen as necessary. Our systems are well established and there are significant controls over payments and new suppliers which substantially limits the opportunity for individuals to obtain fraudulent payments.

Risk Category	Risk Description	Rating	Plans and Mitigations
Financial	We do not generate sufficient income to achieve full cost recovery and/or we breach one of our HM Treasury Control Totals.	6 - Amber	Each year we undertake a comprehensive planning and budgeting process to determine the fee rates we need to charge to clients. The income, expenditure and activity trends are monitored throughout the year, and this enables prompt action to be taken to bring spending in line with HM Treasury Control Totals.
People	We are unable to attract and retain sufficient legal and other professionals necessary to deliver against the demand for GLD's services.	9 - Amber	<p>We continue to see the success from our Business Case in early 2023 for an increased pay offer for our lawyers in halving our attrition and increasing our attraction and steady growth in across our non-London sites continues. We are now able to take more targeted action via specialist campaigns to help attract into hard to fill roles and have a number of campaigns to do this underway.</p> <p>We continue to experience high levels of vacancies across our corporate roles and in some areas, (for example litigation and DDaT) there remains a high level of temporary (agency) resource. We are modelling the pay remit now for this population and considering options for a Pay Business Case.</p>
Client and External Relations	GLD fails to meet the demand for high quality, trusted and integrated legal services (utilising a combination of internal and external legal provision) at an acceptable cost to clients, leading to loss of confidence in GLD and undermining our role as the default provider of legal services to government.	9 - Amber	We manage this risk by continuing to proactively recruit, develop and support lawyers to provide best value legal services to government. We are procuring a new Legal Panel for Government to access high quality, competitive external legal services where necessary to supplement GLD capacity and capability. We have an overall client approach supported by local client care plans to help build and maintain the trust and confidence of clients and have achieved our aims of 95% or above on our client satisfaction rating.
Legal Practice Management	GLD's project to implement a Legal Practice Management system is unsuccessful, does not deliver its anticipated benefits in full or significantly slips and not completed before the existing unsupported core operational CMS fails (critical issue for GLD), adversely impacting legal service delivery and compliance, resulting in financial penalties, reduced productivity and reputational damage.	9 - Amber	<p>The current risk assessment is low, pending the completion of the critical alpha phase and HMT approval of the Outline Business Case. The successful completion of both of these key decision points, alongside the planning of the next beta phase will be the point at which the residual risk can be reviewed.</p> <p>The internal audit for 2024-2025 rated Governance Structure and Controls, Risk Management and Assurance, and Capacity and Capability as low risk, while Milestones and Delivery Timescales are medium risk. The project is well established, following standards, and has undergone thorough reviews.</p>
Innovation	The absence of a clear innovation strategy, well-defined innovation processes, and strong innovation capabilities - combined with the rapid development and wider availability of generative artificial (Gen AI) could obstruct future efforts to foster innovation and build an innovation-driven culture and result in missed opportunities for improved efficiencies.	6 - Amber	This risk is present and likely to grow as the technology becomes more pervasive in society and more powerful. Use by hostile actors will mainly be managed under the security risk but greater understanding of AI among staff will support that. Stimulating staff engagement with the subject, delivering training to build knowledge and exposure to using Gen AI-based tools will mitigate the risk of misuse or deterioration of quality in house. We will continue to monitor use of AI in the private sector in order to identify practices that may be of concern to us.
Strategic Workforce Planning	GLD's annual workforce planning process limits our understanding of medium to long term capability and capacity requirements for legal services across government, constraining medium-long term organisational (GLD) design and development. This could result in skills and capability gaps, a less effective workforce and inefficient deployment of GLD's capacity.	12 - Red	The Executive Committee manages the risk by reviewing collective resource bids, but this does not provide a long-term solution for aligning demand with service supply requirements. To mitigate this, we plan to introduce a stronger horizon scanning capability to support strategic workforce planning. Recognising the risks associated with the current system, we aim to improve organisational design and development to ensure sustainable career paths and efficient service delivery.

Risk ratings are based on a combined assessment of likelihood and impact, resulting in a combined risk scoring of 1 to 25 with 1 being the lowest risk and 25 the highest risk. The numerical scores are grouped into 4 colours: Green for risks with a combined score of 1-4, Amber 5-10, Red 12-15, Brown 16-25.

The table below summarises our risk appetite for our principal risks, serving as a benchmark for managing and mitigating risks. The Executive Committee reviewed the risk appetite in November 2024, which was subsequently approved by the ARAC and the Board in December 2024.

Principal Risks	Risk appetite ratings				
	Averse Seek to avoid risk and uncertainty, virtually no inherent risk.	Minimalist Preference for very safe delivery options, low level of inherent risk.	Cautious Preference for safer delivery options but will accept some risk, High inherent risk but controlled to a low level of residual risk.	Open Consider all options. Choice is the most likely to be successful. Balance between high likelihood of success and high level of residual risk.	Eager Innovate and maximise opportunities. High potential benefits. High level of residual risk.
Property	✓				
Business Continuity	✓				
Security		✓			
Technology			✓		
Operations			✓		
Financial			✓		
People	Varied				
Client and External Relations			✓		
Legal Practice Management					✓
Innovation			✓		
Strategic Workforce Planning			✓		

Security, information governance and business continuity

Information is a key asset. Protecting and ensuring information, security, confidentiality and integrity remains a tenet of GLD's approach to information risk management. GLD maintains an information governance framework of relevant policies and procedures designed to support the protection and security of information used in GLD's operations. The framework is assured on a quarterly basis by Senior Information Risk Owner (SIRO) reporting, focusing on the current state of Data Protection, Information and Cyber Security and Risk management activities across GLD. All staff are provided mandatory 'Security and Data Protection' and training, to ensure they are fully aware of their responsibility to process personal information lawfully and securely. GLD also maintains a Security Working Group (SWG), Chaired by the Head of Protective Security, to monitor and manage Security Risks and Issues. Supplementing the SWG, monthly GLD reviews and revises all policies and procedures in relation to Physical and Personnel Security, ensuring that all assets are protected from all threats, whether Insider or otherwise, deliberate or accidental.

GLD has been re-certified as an ISO27001 compliant organisation, meeting the standard for information security management. GLD remains assured against Cyber Essential Plus Certifications and the Government Functional Security Standard (GovS 007: Security) and maintains its Cyber resilience through comprehensive penetration testing, vulnerability management and protective monitoring policies, with our IT services on, or connected to the GLD network, being monitored by the Security Incident Event Management (SIEM) appliance.

Underpinning this, GLD has a robust business continuity management strategy which follows a delegated model ensuring that all areas of the organisation are responsible for maintaining contingency plans. This is overseen by the GLD's Incident Management Team which assures the continued delivery of legal services to clients in the event of disruption. This approach was successfully tested in a simulated exercise bringing together the members of the Incident Management Team, business managers from across GLD and representatives from the Cross Government Business Continuity Network who provided peer review. The GLD ARAC were provided with a comprehensive report and agreed with the assessment that GLD's level of maturity, measured against the BS65000 guidelines, was at Good Practice. The creation of the Chief Operating Officer role has enabled the organisation to align itself to the Gold, Silver, Bronze Command structure, with the COO taking the Gold Command role, providing a greater level of engagement at senior level. 2025 will see the introduction of bespoke business continuity training courses available to all GLD staff and a comprehensive exercise to test the wider GLD estate.

Whistleblowing

There are currently no active ‘whistleblowing’ cases being investigated by any of GLD’s four nominated officers. Colleagues do continue to approach the nominated officer cohort with concerns, some in relation to the Civil Service Code and some related to wider dynamics and culture within the department. In recent times these have been resolved informally through discussion or organisational action where appropriate to do so and without recourse to a full investigation, for example clarification of the department’s guidance and policy on the use of pro-nouns.

In terms of wider organisational insight, the 2024 People Survey results provide an insight into staff awareness of the Civil Service Code, along with their confidence when raising concerns, speaking up and challenging inappropriate behaviours. The survey results showed GLD has a high level of awareness of the Civil Service Code and what it means for their conduct, with 94% of staff providing a positive response. This is 2% higher than the Civil Service benchmark, and an increase of 3% since both 2023 and 2022. A large proportion of people (76%) are confident that if they raised a concern under the Civil Service Code in GLD it would be investigated properly. This is in line with the Civil Service benchmark, and remains the same as 2023, a 3% increase from 2022 (73%). In addition, 77% feel encouraged to speak up when they identify a serious policy or delivery risk, which is 3% higher than the Civil Service benchmark and 1% higher than 2023. 71% feel able to challenge inappropriate behaviour in the workplace, which is in line with the Civil Service benchmark and 1% higher than both 2023 and 2022.

Whilst these are encouraging there is still more to do to regularly promote the routes by which to raise a concern and the role of the nominated officers. The survey showed that 66% of respondents are aware of how to raise a concern under the Civil Service Code. This is lower than the Civil Service benchmark by 4%, and a decrease since 2023 of 3%, however this is still higher than the 2022 results. As such we will be monitoring this trend. Anecdotally this may be due to the significant expansion of GLD which has seen many new individuals join in their first Civil Service role.

The Civil Service is making plans to promote the Civil Service Code including a focus on the responsibility for championing the code at the SCS level. Plans are being developed to resume issuing the Code to new employees when they join, including guidance about raising concerns, and adding a requirement to sign the Code as part of onboarding into the Civil Service. These changes will help to sustain and enhance awareness of the Code and support the department’s culture and commitment to whistleblowing and transparency.

Effectiveness of the risk management and governance framework

Assurance is obtained from a range of sources, including the work of the Internal Auditors. In their Annual Assurance Report, which offers an opinion on the adequacy and effectiveness of risk management, control and governance, the Head of Internal Audit gave a moderate level of assurance. In his opinion, some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management and control. Assurance on information handling is provided by the Senior Information Risk Owner, Nick Price CBE, Operations Director and Senior Security Advisor, supported by the Security Team.

GLD directors provide an annual end of year Assurance Report highlighting any risks that crystallised during the year. These assurances have been reviewed by the ARAC.

At the end of each quarter, GLD conducts a formal forecasting exercise. GLD directors are asked to review their resourcing priorities and relevant income and expenditure against budget, and to forecast their year-end position. This information enables the Executive Committee and the Board to identify areas of concern and, if necessary, to review and consider the allocation of resources in meeting GLD objectives. It also enables consideration of potential in-year fee reductions and rebates/refunds, where a surplus is forecast, or increases if a deficit is forecast.

External assurance of GLD’s litigation activities is provided by the Law Society against the Lexcel Standard, and GLD’s information systems are assured against the Lloyd’s Register Quality Assurance Ltd standard ISO27001.

In addition we have considered and implemented Government Functional Standards where appropriate.

These processes highlighted no issues of significance with regard to the corporate health or operations of GLD in 2024-25.

Remuneration and Staff Report

Remuneration Report

Service contracts

The Constitutional Reform and Governance Act 2010 requires Civil Service appointments to be made on merit on the basis of fair and open competition. The Recruitment Principles published by the Civil Service Commission specify the circumstances when appointments may be made otherwise.

Unless otherwise stated below, the officials covered by this report hold appointments, which are open-ended. Early termination, other than for misconduct, would result in the individual receiving compensation as set out in the Civil Service Compensation Scheme.

Further information about the work of the Civil Service Commission can be found at: <https://civilservicecommission.independent.gov.uk/>

Remuneration policy

The Prime Minister, following independent advice from the Senior Salaries Review Body, sets the remuneration of senior civil servants. The Review Body also advises the Prime Minister, from time to time, on the pay and pensions of Members of Parliament and their allowances; on Peers' allowances; and on the pay, pensions and allowances of ministers and others whose pay is determined by the Ministerial and Other Salaries Act 1975.

In reaching its recommendations, the Review Body has regard to the following considerations:

- the need to recruit, retain and motivate suitably able and qualified people to exercise their different responsibilities;
- regional/local variations in labour markets and their effects on the recruitment and retention of staff;
- government policies for improving public services including the requirement on departments to meet the output targets for the delivery of departmental services;
- the funds available to departments as set out in the government's departmental expenditure limits; and
- the government's inflation target.

The Review Body takes account of the evidence it receives about wider economic considerations and the affordability of its recommendations.

Further information about the work of the Review Body can be found at: <https://www.gov.uk/government/organisations/office-of-manpower-economics>

Permanent Secretaries are paid within the Permanent Secretaries pay range. The exact position on the pay range is set individually for each Permanent Secretary by the government on the recommendation of the Permanent Secretaries Remuneration Committee (which the government normally expects to accept). The Committee comprises members of the Senior Salaries Review Body, the Head of the Home Civil Service and the Permanent Secretary of HMT.

Consolidated awards (salary increase)

In 2024-25 the department was bound by SCS Cabinet Office Practitioner Guidance to implement the new pay range minima and give all eligible members of the SCS a consolidated pay award of 5% of their base pay, inclusive of any increase necessary to uplift members to the revised pay band minimum.

Non-consolidated performance related pay awards

An end-of-year non-consolidated amount was available for jobholders who were assessed as "Exceeding" or "High Performing" in the 2023-24 performance year.

In-year non-consolidated awards for performance during 2024-25 were made using the overall budget for non-consolidated SCS payments. The criteria used to award these were:

Level 1 and/or Team Award (within division)	Level 2 (across multiple divisions/government) Can also be awarded for achievement in division where the task was significantly complex
Has developed and led the implementation of an idea and/or (corporate) initiative that has demonstrably achieved a strategic aim(s), across their wider division.	Has developed and led the implementation of an idea and/or (corporate) initiative that has demonstrably achieved a strategic aim(s), across multiple divisions/government.
Has developed collaboratively across the division and led the implementation of an idea and/or (corporate) initiative that has demonstrably achieved a strategic aim(s), across the wider division.	Has developed collaboratively across multiple divisions and led the implementation of an idea and/or (corporate) initiative that has demonstrably achieved a strategic aim(s), across multiple divisions/ government.
Has demonstrably contributed to the improvement of capability, resilience, wellbeing and performance in their work area.	Has demonstrably contributed to the improvement of capability, resilience, wellbeing and performance across multiple divisions/ government.
Has demonstrably improved diversity, including social mobility, in their work area/division.	Has demonstrably improved diversity, including social mobility, across multiple divisions/government.
Has led a piece of work that has demonstrably secured significant savings or efficiency gains in their work area/division.	Has led a piece of work that has demonstrably secured significant savings or efficiency gains across multiple divisions/ government.
Leading as a subject expert, demonstrably building capability within their division.	Leading as a subject expert, demonstrably building capability with an impact across multiple divisions/government.

Note: SCS jobholders who were awarded both an in-year payment for performance in 2023-24 and end-of-year payment had their total non-consolidated payments for the year capped at the amount for the annual performance award.

Remuneration (including salary) and pension entitlements

The following sections provide details of the remuneration and pension interests of the senior management (i.e. Board members) of the department.

Single total figure of remuneration

Officials	Salary £000		Bonus Payments £000		Pension Benefits to nearest £1,000¹		Total £000	
	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24
Susanna McGibbon KC (Hon) Permanent Secretary	180-185	175-180	-	5-10	120,000	79,000	300-305	265-270
Mel Nebhrajani CB Legal Director General	145-150	140-145	5-10	-	102,000	69,000	255-260	205-210
Caroline Croft Legal Director General from June 2023	115-120	90-95	-	-	138,000	184,000	250-255	275-280
Sarah Goom Legal Director General from September 2023	130-135	75-80	-	5-10	237,000	131,000	370-375	215-220
Elizabeth Hambley Legal Director General to August 2023	-	60-65	-	5-10	-	-8,000	-	60-65
Jessica de Mounteney Legal Director General to May 2023	-	15-20	-	-	-	-	-	15-20
Richard Cornish Director General, Chief Operating Officer from March 2024	130-135	10-15	-	-	74,000	-26,000	205-210	-15-20
Damian Paterson Director of Strategy, People and Culture	110-115	105-110	0-5	-	65,000	53,000	175-180	155-160

Single total figure of remuneration

Carmel Thornton

Director of Finance,
Operations and Digital from
January 2024

100-105

20-25

0-5

-

148,000

32,000

250-255

55-60

Jon Fundrey

Director of Finance,
Operations and Digital from
May 2022 to October 2023

-

85-90

-

5-10

-

25,000

-

120-125

Douglas Wilson KC (Hon)

OBE

Ex-Officio Board member

155-160

150-155

5-10

5-10

110,000

46,000

275-280

205-210

¹ The value of pension benefits accrued during the year is calculated as (the real increase in pension multiplied by 20) plus (the real increase in any lump sum) less (the contributions made by the individual). The real increase excludes increases due to inflation or any increase or decrease due to transfer of pension rights. Where prior year pension figures have changed this is due to updated information. Changes in pension benefit can be negative as well as positive. 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

There were no benefits in kind.

2024-25 notes:

Caroline Croft - full year equivalent salary was £130k-£135k

2023-24 notes:

Caroline Croft - full year equivalent salary was £125k-£130k

Sarah Goom - full year equivalent salary was £125k-£130k

Elizabeth Hambley - full year equivalent salary was £140k-£145k

Jessica de Mountenay - full year equivalent salary was £195k-£200k

Richard Cornish - full year equivalent salary was £125k-£130k

Carmel Thornton - full year equivalent salary was £95k-£100k

Jon Fundrey - full year equivalent permanent salary was £150k-£155k, salary includes an amount paid when employed as a contractor of £11k

Douglas Wilson KC (Hon) OBE - is paid by the Attorney General's Office

This information has been subject to audit.

The non-executive directors were paid salaries in the following bands

	Contract end	Salary £000		Benefits-in-kind to nearest £100		Total £000	
		2024-25	2023-24	2024-25	2023-24	2024-25	2023-24
The Rt Hon Dame Janet Paraskeva DBE PC	January 2027	20-25	0-5	-	-	20-25	0-5
Mike Green	January 2026	15-20	15-20	-	1,000	15-20	15-20
Tim Fallowfield OBE	January 2027	15-20	0-5	-	-	0-5	0-5
Catherine Berney	April 2023	-	0-5	-	-	0-5	0-5
Erica Handling	October 2023	-	5-10	-	-	5-10	5-10

Full year equivalents for Catherine Berney, Erica Handling, the Rt Hon Dame Janet Paraskeva DBE PC and Tim Fallowfield OBE are £15k-£20k for 2023-24 salary. The 2023-24 benefit in kind disclosed relates to reimbursement of travel expenses.

This information has been subject to audit.

Salary

'Salary' includes gross salary; overtime; reserved rights to London weighting or London allowances; recruitment and retention allowances; private office allowances and any other allowance to the extent that it is subject to UK taxation. This report is based on payments made by the department and thus recorded in these Accounts.

Benefits in kind

The monetary value of benefits in kind covers any benefits provided by the department and treated by HM Revenue and Customs as a taxable emolument. The estimated monetary value of benefits in kind which relate solely to the provision of interest free loans for the purchase of season tickets for home to office travel is not included.

Bonus payments

Performance related pay awards (non-consolidated) are based on an individual’s performance and are moderated as part of the SCS appraisal process. Bonuses disclosed may relate to performance in the previous financial year.

Pay multiples

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid director in their organisation and the median remuneration of the organisation’s workforce.

	2024-25	2023-24 restated	Percentage change %
Remuneration of the highest-paid director	£182,500	£197,500	-8%
25th percentile of pay and benefits	£49,919	£47,541	5%
Highest-paid director's remuneration as a multiple of the 25th percentile	3.7	4.2	-12%
Median remuneration of the workforce	£61,200	£58,672	4%
Highest-paid director's remuneration as a multiple of the median remuneration	3.0	3.4	-12%
75th percentile of pay and benefits	£74,000	£72,500	2%
Highest-paid director's remuneration as a multiple of the 75th percentile	2.5	2.7	-7%
Average percentage change in pay relative to the previous financial year for the organisation as a whole	6%	7%	

Total remuneration includes salary, non-consolidated performance-related pay and benefits in kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value (CETV) of pensions. The median, 25th and 75th percentiles are salary only, there were no bonuses or benefits. There was a bonus element relating to the highest paid director for 2023-24 only.

The pay ratios for the 25th, median and 75th percentiles have reduced by 9%, 7% and 5% respectively. The decrease in the median pay ratio is attributable to lower remuneration for the highest paid director and higher pay at the 25th, median and 75th percentiles.

The median pay ratio is consistent with the pay, reward and progression policies for the department.

In 2024-25 no (2023-24: no) employees received remuneration in excess of the highest-paid director. Remuneration ranged from £25k-£183k (2023-24: £24k-£198k).

*2023-24 has been restated to reflect the annualised figure for the remuneration of the highest paid director

Salary Component only:

	2024-25	2023-24 restated	Percentage change %
Remuneration of the highest-paid director	£182,500	£197,500	-8%
25th percentile of pay and benefits	£49,919	£47,541	5%
Highest-paid director's remuneration as a multiple of the 25th percentile	3.7	4.2	-12%
Median remuneration of the workforce	£61,200	£58,672	4%
Highest-paid director's remuneration as a multiple of the median remuneration	3.0	3.4	-12%
75th percentile of pay and benefits	£74,000	£72,500	2%
Highest-paid director's remuneration as a multiple of the 75th percentile	2.5	2.7	-7%
Average percentage change in pay relative to the previous financial year for the organisation as a whole	6%	7%	

This information has been subject to audit.

Pension benefits

Officials	Accrued pension at pension age 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	Employer contribution to partnership pension accounts
	£000	£000	£000	£000	£000	Nearest £100
Susanna McGibbon KC (Hon) Permanent Secretary	75-80 plus lump sum of 195-200	5-7.5 plus lump sum of 5-7.5	1,841	1,659	104	-
Mel Nebhrajani CB Legal Director General	65-70	5-7.5	1,340	1,195	90	-
Caroline Croft Legal Director General	55-60 plus lump sum of 145-150	5-7.5 plus lump sum of 10-12.5	1,353	1,165	136	-
Sarah Goom Legal Director General	75-80	10-12.5	1,609	1,318	233	-
Richard Cornish Director General, Chief Operating Officer	35-40 plus a lump sum of 85-90	2.5-5 plus a lump sum of 2.5-5	689	610	47	-
Damian Paterson Director of Strategy, People and Culture	40-45	2.5-5	699	625	42	-
Carmel Thornton Director of Finance, Operations and Digital	45-50 plus a lump sum of 120-125	5-7.5 plus a lump sum of 12.5-15	1,104	922	142	-
Douglas Wilson KC (Hon) OBE Ex-Officio board member	50-55	5-7.5	937	815	77	-

This information has been subject to audit.

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.

2023-24 Pension Benefits

Accrued pension benefits for directors for 2023-24 were not included in the 2023-24 Annual Report due to an exceptional delay in the calculation of these figures following the application of the public service pensions remedy. The reportable figures from that period are included in the table below:

Officials	Accrued pension at pension age at 31/03/24 and related lump sum £000	Real increase in pension and related lump sum at pension age £000	CETV at 31/03/24 £000	CETV at 31/03/23 £000	Real increase in CETV £000	Employer contribution to partnership pension accounts Nearest £100
Susanna McGibbon KC (Hon) Permanent Secretary	70-75 plus a lump sum of 185-190	2.5-5 plus a lump sum of 0-2.5	1,659	1,460	61	-
Mel Nebhrajani CB Legal Director General	55-60	2.5-5	1,195	1,042	54	-
Caroline Croft Legal Director General from June 2023	45-50 plus a lump sum of 130-135	7.5-10 plus a lump sum of 17.5-20	1,165	908	186	-
Sarah Goom Legal Director General from September 2023	60-65	5-7.5	1,318	1,127	128	-
Elizabeth Hambley Legal Director General to August 2023	50-55 plus a lump sum of 140-145	0 plus a lump sum of 0	1,224	1,178	-16	-
Jessica de Mounteney Legal Director General to May 2023	-	-	-	-	-	2,500
Richard Cornish Director General, Chief Operating Officer from March 2024	30-35 plus a lump sum of 80-85	0 plus a lump sum of 0-	610	582	-24	-
Damian Paterson Director of Strategy, People and Culture	35-40	2.5-5	625	539	32	-
Carmel Thornton Director of Finance, Operations and Digital from January 2024	35-40 plus a lump sum of 105-110	0-2.5 plus a lump sum of 2.5-5	922	874	32	-
Jon Fundrey Director of Finance, Operations and Digital from May 2022 to October 2023	60-65	0-2.5	1,251	1,113	22	-
Douglas Wilson KC (Hon) OBE Ex-Officio board member	45-50	2.5-5	815	719	26	-

This information has been subject to audit.

Civil Service pensions

Pension benefits are provided through the Civil Service pension arrangements. Before 1 April 2015, the only scheme was the Principal Civil Service Pension Scheme (PCSPS), which is divided into a few different sections – classic, premium, and classic plus provide benefits on a final salary basis, whilst nuvos provides benefits on a career average basis. 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. All newly appointed civil servants, and the majority of those already in service, joined the new scheme.

The PCSPS and alpha are unfunded statutory schemes. Employees and employers make contributions (employee contributions range between 4.6% and 8.05%, depending on salary). The balance of the cost of benefits in payment is met by monies voted by Parliament each year. Pensions in payment are increased annually in line with the Pensions Increase legislation. Instead of the defined benefit arrangements, employees may opt for a defined contribution pension with an employer contribution, the partnership pension account.

In alpha, pension builds up at a rate of 2.32% of pensionable earnings each year, and the total amount accrued is adjusted annually in line with a rate set by HM Treasury. Members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004. All members who switched to alpha from the PCSPS had 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 accrued pensions shown in this report are the pension the member is entitled to receive when they reach normal pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over normal pension age. Normal 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 in this report show pension earned in PCSPS or alpha – as appropriate. Where a member has benefits in both the PCSPS and alpha, the figures show the combined value of their benefits in the two schemes but note that the constituent parts of that pension may be payable from different ages.

When the government introduced new public service pension schemes in 2015, there were transitional arrangements which treated existing scheme members differently based on their age. Older members of the PCSPS remained in that scheme, rather than moving to alpha. In 2018, the Court of Appeal found that the transitional arrangements in the public service pension schemes unlawfully discriminated against younger members (the "McCloud judgment").

As a result, steps are being taken to remedy those 2015 reforms, making the pension scheme provisions fair to all members. The public service pensions remedy is made up of two parts. The first part closed the PCSPS on 31 March 2022, with all active members becoming members of alpha from 1 April 2022. The second part removes the age discrimination for the remedy period, between 1 April 2015 and 31 March 2022, by moving the membership of eligible members during this period back into the PCSPS on 1 October 2023.

The accrued pension benefits, Cash Equivalent Transfer Value and single total figure of remuneration reported for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the PCSPS 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 PCSPS 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.

The partnership pension account is an occupational defined contribution pension arrangement which is part of the Legal and 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).

Further details about the Civil Service pension arrangements can be found at the website 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

			2024-25	2023-24
	Permanently employed staff	Others	Total	Total
	£000	£000	£000	£000
Wages and salaries	181,379	-	181,379	161,770
Social security costs	20,786	-	20,786	18,582
Other pension costs	50,910	-	50,910	42,830
Sub Total	253,075	-	253,075	223,182
Agency and contracted staff	-	26,773	26,773	25,244
Inward secondments	-	898	898	186
Total	253,075	27,671	280,746	248,612
Less recoveries in respect of outward secondments	(382)	-	(382)	(258)
Total Net Costs	252,693	27,671	280,364	248,354

No staff costs have been charged to capital.

The Principal Civil Service Pension Scheme (PCSPS) and the Civil Servant and Other Pension Scheme (CSOPS) - known as 'alpha' are unfunded multi-employer defined benefit schemes but GLD is unable to identify its share of the underlying assets and liabilities. The scheme actuary valued the scheme as at 31 March 2020. Details can be found in the resource accounts of the Cabinet Office: Civil Superannuation: www.civilservicepensionscheme.org.uk

For 2024-25, employers' contributions of £50,331k were payable to the PCSPS (2023-24: £42,504k) at one of 4 rates in the range of 26.6 to 30.3% of pensionable pay, based on salary bands. The Scheme Actuary reviews employer contributions usually every 4 years following a full scheme valuation.

The contribution rates are set to meet the cost of the benefits accruing during 2024-25 to be paid when the member retires and not the benefits paid during this period to existing pensioners.

Employees can opt to open a partnership pension account, a stakeholder pension with an employer contribution. Employers' contributions of £414k (2023-24: £345k) were paid to the appointed stakeholder pension provider. Employer contributions are age-related and range from 8 to 14.75% of pensionable pay. Employers also match employee contributions of up to 3% of pensionable pay. In addition, employer contributions of £16k (2023-24: £13k), 0.5% of pensionable pay, were payable to the PCSPS to cover the cost of the future provision of lump sum benefits on death in service and ill health retirement of these employees. Contributions due to the partnership pension providers at the reporting date were £nil. Contributions prepaid at that date were £nil.

2 members of staff retired early on ill health grounds (2023-24: 0); the total additional accrued pension liabilities in the year amounted to £nil (2023-24: £nil). This information has been subject to audit.

Average number of persons employed

The average number of whole-time equivalent persons employed during the year was as follows.

	2024-25		2023-24
	Permanent Staff	Others	Total
GLD	2,782	530	3,312

"Others" relates to agency staff and staff employed on a fixed term basis. This information has been subject to audit.

Reporting of Civil Service and other compensation schemes - exit packages

Exit package cost band	2024-25			2023-24		
	Number of compulsory redundancies	Number of other departures agreed	Total number of exit packages by cost band	Number of compulsory redundancies	Number of other departures agreed	Total number of exit packages by cost band
<£10,000	-	1	1	-	-	-
£10,000 - £25,000	-	-	-	-	-	-
£25,000 - £50,000	-	1	1	-	-	-
£50,000 - £100,000	-	2	2	-	1	1
£100,000- £150,000	-	-	-	-	-	-
£150,000- £200,000	-	-	-	-	-	-
£200,000- £250,000	-	-	-	-	-	-
£250,000- £300,000	-	-	-	-	-	-
Total number of exit packages by type	-	4	4	-	1	1
Total resource cost/£	-	218,522	218,522	-	55,375	55,375

Redundancy and other departure costs have been paid in accordance with the provisions of the Civil Service Compensation Scheme, a statutory scheme made under the Superannuation Act 1972. Exit costs are accounted for in the year of departure. Where the department has agreed early retirements, the additional costs are met by the department and not by the Civil Service pension scheme. Ill-health retirement costs are met by the pension scheme and are not included in the table. This information has been subject to audit.

Staff turnover

The staff turnover percentage for 2024-25 for GLD was 9.2% (2023-24: 9.8%). This has been calculated as the number of leavers between 1 April 2024 and 31 March 2025 divided by the average staff in post over the same period (full time equivalent).

SCS by payband

The number of SCS staff by payband in GLD as at 31 March was as follows:

GLD	31 March 2025	31 March 2024
SCS 4	1	1
SCS 3	4	4
SCS 2	24	24
SCS 1 and 1A	209	195
Total	238	224

Staff composition

We continue to promote equality and inclusion for all and in particular, we continue to maintain a strong gender profile and work to improve the representation of ethnic minority and disabled staff at senior civil service (SCS) level and in feeder grades to the SCS.

We are bound by the Civil Service Commission’s recruitment principles on fair and open competition and selection on merit. Adjustments for candidates with disabilities are provided at all stages of the recruitment process. All interviewers are trained in GLD’s recruitment policy, processes and procedures, which covers, amongst other things, unconscious bias, to ensure the process is fair, objective and inclusive. GLD is a Level 3 Disability Confident Leader and has an active Disability, Mental Health and Wellbeing Network.

The gender breakdown of our headcount as at 31 March was as follows:

	31 March 2025		31 March 2024	
	Male	Female	Male	Female
Officials as disclosed in the Remuneration Report	3	5	3	5
Non-executive directors	2	1	2	1
SCS (excluding officials disclosed in the Remuneration Report)	77	154	80	137
Employees	975	1,967	903	1,869
Total	1,057	2,127	988	2,012

The proportion of ethnic minority staff (based on those who have self-declared) at SCS is 14.3% (2023-24: 14.7%). The proportion of all staff is 22.7% (2023-24: 24.4%). Levels of staff with disabilities (based on those who have self-declared) are 10.5% in the SCS (2023-24 10.7%) and 9.0% for all staff (2023-24: 8.6%). Individuals are supported by efficient arrangements for assessments and the implementation of workplace adjustments for those who require them.

Sickness absence

Overall sickness absence was an average of 4.7 working days lost per staff year (2023-24: 4.8 days). This compares favourably with the Civil Service average of 7.8 days lost per staff year for the year ended 31 March 2024 (most recent available figures). 60% of staff had no sickness absences (2023-24: 64%).

Managers are encouraged to actively manage sickness absence in their area, ensuring that people are supported during any illness, and that any underlying causes are identified and addressed, where possible, through workplace adjustments.

Expenditure on consultancy and temporary staff

Expenditure on consultants in 2024-25 has been £50k (2023-24: £517k). The spend mainly relates to work on the repurchase of the Legal Services Panel framework.

Expenditure on temporary staff in 2024-25 was £26.8m (2023-24: £25.2m). We continue to employ agency and contract staff where there is a need for specialist skills, and where for business reasons the Executive Committee has agreed there should be a mixed economy of permanent and contract staff to provide some flexibility to cope with changes in demand. We also employ agency staff to support our resourcing where we do not the permanent staff required to deliver our work.

Staff policies relating to disability

GLD has been validated as a Level 3: Disability Confident Leader by the businessdisabilityforum.org.uk. GLD provides guaranteed interviews for those who declare as having a disability and who meet the minimum criteria. We provide reasonable adjustments (where required) and ensure diverse interview panels, including an independent panel member.

GLD provides support to any colleagues who suffer illness or who become disabled whilst employed by us. This takes the form of a comprehensive attendance management policy, the use of occupational health referrals (where required), independent employee assistance advice, provision for reasonable adjustments and disability leave. HR business partners allocated to each business area provide advice and support to managers and individuals. Access to training, career development and promotion is available to all staff. Where relevant, this will take into account any reasonable workplace adjustments. GLD regularly reviews data related to protected characteristics, including disability.

Trade union facility time

The Trade Union (Facility Time Publication Requirements) Regulations 2017 came into force on 1 April 2017. These regulations place a legislative requirement on relevant public sector employers to collate and publish, on an annual basis, a range of data on the amount and cost of facility time within their organisation.

Table 1: Relevant Union Officials

Total number of employees who were relevant union officials between 1 April 2024 and 31 March 2025.

	2024-25 No.	2023-24 No.
Employees who were relevant union officials during the relevant period	33	31
Full-time equivalent number	29.6	30.8

Table 2: Percentage of time spent on facility time

For employees who were relevant union officials employed between 1 April 2024 and 31 March 2025, percentage of their working hours spent on facility time.

	2024-25 No.	2023-24 No.
0%	-	3
1% - 50%	33	28
51% - 99%	-	-
100%	-	-

Table 3: Percentage of pay bill spent on facility time

For employees who were relevant union officials employed between 1 April 2024 and 31 March 2025, percentage of pay bill spent on facility time.

	2024-25	2023-24
The total cost of facility time (£k)	87	114
The total annual pay bill for GLD (£k)	248,329	218,186
The percentage of total pay bill spend on facility time (%)	0.03	0.05

Table 4: Paid trade union activities

For employees who were relevant union officials employed between 1 April 2024 and 31 March 2025, percentage of time spent on paid trade union activities.

	2024-25	2023-24
Time spent on paid trade union activities as a percentage of total paid of facility time hours (%)	-	-

Partnership

GLD has continued to maintain a positive working relationship with the trade unions (First Division Association and Public and Commercial Services). Human Resources regularly meet the unions on an informal basis to discuss a range of issues that have an impact on union members, and there are also regular formal Partnership meetings, which include representatives from across GLD, and departmental and national union representatives. Business managers are also encouraged to meet trade union colleagues at an early stage where resourcing levels or workloads may be changing.

Consultation with employees: 2024 People Survey

The People Survey is a key measure of the department's success in delivering GLD's vision to be the 'best employer for our people'. In the 2024 Survey, GLD achieved an Engagement Index of 64% (with a response rate of 69%), this represented a 3-point rise on 2023 and is level with the Civil Service average. The engagement index has risen five points since 2022.

Of the 9 main engagement areas, 4 have risen compared to 2023 (My Team, Learning and Development, Resources and Workload and Pay and Benefits) and 3 (Organisational Objectives and Purpose, My Manager, Inclusion and Fair Treatment) have stayed the same. Leadership and Management and My Work have dropped. Colleagues reporting experience of discrimination stayed the same as 2023. Colleagues reporting that they have experienced Bullying and

Harassment rose by 1%.

This year, the staff survey will not have a stand-alone action plan, the actions have been absorbed in the new People Strategy.

Health and Safety

GLD continues to comply with the requirements of the Health and Safety at Work Act 1974). Our Public Sector landlords continue to have robust systems of work in place that enable GLD to monitor compliance on a regular basis. During the year, there were only three accidents reported and no near misses. Remedial action has been taken in relation to these accidents. There were no RIDDOR (reporting of injuries, diseases, and dangerous occurrence regulations) incidents reported.

During the year, GLD workplace adjustment policies were refreshed to ensure that they are updated in-line with the Cabinet Office Civil Service Employee Policy (CSEP). The GLD Disability Network (DAWN) and the Trade Union side have been engaged in the process of reviewing the updated policies before they are published. A rolling communications plan continues, highlighting key issues and concerns raised by DAWN members.

GLD have continued to engage the services of the Civil Service Workstation Assessment Service (CSWAS) for advisory services only. The Reasonable Adjustment Passport System is used by GLD and is key to helping to ensure that reasonable adjustments are transferred seamlessly between teams, for the member of staff they have been assigned. The Passport template has been reviewed in liaison with some Assistive Technology users with the aim of making it even more accessible and inclusive and it should now work well with systems such as JAWS. The latest version has been added to GLD's intranet. Managers and staff can adjust the template to suit individual circumstances or needs.

GLD continues to provide furniture and equipment for staff who are working in new hybrid ways of working, where GLD staff are entitled to request workplace adjustments recommended by Occupational Health assessments for both home and work environments. The policy for providing furniture and equipment was refreshed in February 2025 to reflect GLD's continued commitment to meeting its obligations to staff, but that control for purchasing of all such items sits with Operations and that staff were no longer permitted to purchase items and claim on expenses.

Sick absence statistical data submitted to Cabinet Office, for 2024-25 (Q3, up to end of Dec 2024), showed that the average number of working days lost (AWDL) for GLD is 4.7 days, which is marginally lower from the same time last year at 4.8 days lost. This is below the GLD's People Strategy ceiling of 5.0 AWDL. The Civil Service Overall AWDL is 8.1 days (as at September 2024). In terms of type of absence, the highest number of reported short term absences were identified as 'Respiratory System Illnesses'. This type of absence accounts for 9.7% of the GLD total days lost and 17% of the total short-term days lost. Mental Health Disorders was the main cause of absence up to end of Dec 2024 (Q3) and has stayed the same as last quarter at 1.4 days lost. It continues to be the main cause of long-term absence in both the GLD and across the Civil Service.

GLD has 51 trained Mental Health First Aiders. GLD first trained a tranche of Mental Health First Aiders in October 2016 and expanded the network in the winter of 2023. Our Mental Health First Aiders are drawn from across the organisation, from a range of grades, locations, and backgrounds.

GLD continues to show visible leadership and we have strengthened our commitment through embedding health and wellbeing into our GLD People Strategy 2025-28, published in February 2025, that includes the Diversity and Inclusion and Wellbeing People Ambition. This will be underpinned by actions in the People Strategy delivery plan, launching in April. Positive Emotions, Engagement, Relationships, Meaning and Accomplishment (PERMA) and Proxy scores were included in the analysis of the 2024 People Survey results informing both the People Strategy and delivery plan.

GLD takes actions on health and wellbeing and mental health awareness, resilience and wellbeing continue to be included in the Personal Effective Programme and on the Learning Management System (LMS). New GLD health and wellbeing e-learning 'Harnessing Healthy Habits' was launched last year and we have recently finished piloting mental health training for line managers, facilitated by our Mental Health First Aiders, to go live in the coming months. The Health and Wellbeing pages on Eagle, being refreshed this year, will continue to provide wellbeing and mental health guidance.

High paid off-payroll appointments

Following the Review of Tax Arrangements of Public Sector Appointees published by the Chief Secretary to the Treasury on 23 May 2013, departments must publish information on their high paid and/or senior off-payroll engagements.

For GLD, these engagements are principally made up of 2 categories of individual:

- In the Digital and Data area, the GLD Executive Committee has agreed that there should be a mixed economy of permanent and temporary staff for practical business reasons. During 2024-25, GLD continued to manage a number of temporary agency Digital staff to undertake specific IT tasks, in addition to some who have been there for longer periods
- Temporary agency lawyers, via the Contingent Labour contract, who are filling business critical posts and help manage the fluctuation in demand for legal services.

Details are as follows:

Table 1: For all off-payroll engagements as of 31 March 2025, for more than £245 per day

	No. 31 March 2025	No. 31 March 2024
No. of existing engagements as at 31 March	94	100
Of which		
No. that have existed for less than one year at time of reporting	20	22
No. that have existed for between one and 2 years at time of reporting	23	31
No. that have existed for between 2 and 3 years at time of reporting	24	15
No. that have existed for between 3 and 4 years at time of reporting	8	8
No. that have existed for 4 or more years at time of reporting	19	24

Table 2: For all off-payroll appointments engaged at any point between 1 April 2024 and 31 March 2025 for more than £245 per day

	No. 2024-25	No. 2023-24
No. of temporary off-payroll appointments engaged between 1 April 2024 and 31 March 2025	124	156
Of which		
Not subject to off-payroll legislation	10	-
Subject to off-payroll legislation and determined as in-scope of IR35	112	153
Subject to off-payroll legislation and determined as out-of-scope of IR35	2	3
No. of engagements reassessed for compliance or assurance purposes during the year	-	-
Of which: No. of engagements that saw a change to IR35 status following review	-	-

All Board members, and/or senior officials with significant financial responsibility, between 1 April 2024 and 31 March 2025 were on payroll for their whole tenure.

In 2023-24 one Board member was engaged off-payroll for a period of 2 weeks following their retirement from the Civil Service to enable a smooth handover of responsibilities to colleagues which could not take place immediately prior to their leaving date. All other Board members, and/or senior officials with significant financial responsibility, between 1 April 2023 and 31 March 2024 were on payroll.

Parliamentary Accountability and Audit Report

This information has been subject to audit.

Fees and charges

An analysis of the department’s income and associated costs is shown below. Charges for the provision of legal services and administration services to Bona Vacantia Division are set to recover full costs in accordance with HMT’s guidance on fees and charges set out in Managing Public Money. This analysis is not for International Financial Reporting Standard (IFRS) 8 Operating Segments purposes.

	2024-25				2023-24			
	Income £000	Vote funding £000	Full Cost £000	Surplus/ (deficit) £000	Income £000	Vote funding £000	Full Cost £000	Surplus/ (deficit) £000
Legal fees and charges to clients	385,463	-	370,431	15,032	342,045	-	334,271	7,774
Bona Vacantia	4,861	-	4,861	-	4,731	-	4,731	-
Other income	3,248	-	3,248	-	2,683	-	2,683	-
Non-chargeable work	-	416	416	-	-	272	272	-
Total	393,572	416	378,956	15,032	349,459	272	341,957	7,774

'Bona Vacantia' relates to income charged for administering bona vacantia (ownerless assets in respect of dissolved companies and intestate estates). 'Other income' is primarily related to recoveries for subscription costs and costs associated with Strategic Relationship Management relating to the Legal Services Panel. Vote funding relates to Public Interest legal work. In accordance with HMT’s guidance a notional cost of capital charge £829k (2023-24: £787k) is included for setting fees and charges and is also reflected in full cost figures for this analysis. The notional cost of capital is not recognised in the financial statements. The cost of capital charge is calculated at the real rate set by HMT (currently 3.5%) on the average carrying amount of all assets less liabilities, except for cash balances held with the Government Banking Service.

Remote contingent liabilities

The department has no contingent liabilities that need to be disclosed under Parliamentary reporting requirements.

Losses and special payments

HMT's publication - Managing Public Money - requires a statement showing losses and special payments by value and by type to be disclosed where the total of losses or the total of special payments exceed £300k. Individual losses or special payments of more than £300k are noted separately.

Losses are transactions of a type which Parliament could not have foreseen when Supply funding for the department was voted. The term loss includes loss of cash and stores, fruitless payments, losses arising from overpayments and claims waived. There were no significant losses that needed to be reported, the total being below £300k.

Special payments are transactions that Parliament could not have anticipated when passing legislation or approving Supply Estimates for the department. Examples include: extra contractual or ex-gratia payments to contractors or staff or extra statutory and extra regulatory payments. There were no significant special payments that needed to be reported, the total being below £300k.

Long term expenditure trends

This information is not subject to audit. Our planned net expenditure as agreed with HMT is as follows. This covers the costs that are not recovered from our clients, but which are met from the Parliamentary Estimate.

£m	2025-26
DEL Resource	2.2
DEL Capital	10.2

The Departmental Expenditure Limit (DEL) Resource funding for 2025-26 is to cover the costs of public interest casework (Letters of Request and Vesting Orders in Chancery). The DEL Capital funding allows us to invest in improving and developing systems to support our operations and to meet our accommodation requirements.

The Certificate and Report of the Comptroller and Auditor General to the House of Commons

Opinion on financial statements

I certify that I have audited the financial statements of the Government Legal Department for the year ended 31 March 2025 under the Government Resources and Accounts Act 2000.

The financial statements comprise the Government Legal Department's:

- Statement of Financial Position as at 31 March 2025;
- Statement of Comprehensive Net Income, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted international accounting standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Government Legal Department's affairs as at 31 March 2025 and its net operating income for the year then ended; and
- have been properly prepared in accordance with the Government Resources and Accounts Act 2000 and HM Treasury directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2022). My responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's Revised Ethical Standard 2024. I am independent of the Government Legal Department in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Government Legal Department's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

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

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Government Legal Department is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

Other information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate and report thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

Opinion on other matters

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000.

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

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000;
- the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

Matters on which I report by exception

In the light of the knowledge and understanding of the Government Legal Department and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Reports.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the Government Legal Department or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Chief Executive as Accounting Officer is responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- providing the C&AG with additional information and explanations needed for his audit;
- providing the C&AG with unrestricted access to persons within the Government Legal Department from whom the auditor determines it necessary to obtain audit evidence;

- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view and are in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000; and
- assessing the Government Legal Department'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 the Accounting Officer anticipates that the services provided by the Government Legal Department will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Government Resources and Accounts Act 2000.

My 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 a certificate that includes my 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 economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations, including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the Government Legal Department's accounting policies, key performance indicators and performance incentives.
- inquired of management, Government Legal Department's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Government Legal Department's policies and procedures on:
 - identifying, evaluating and complying with laws and regulations;
 - detecting and responding to the risks of fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Government Legal Department's controls relating to the Government Legal Department's compliance with the Government Resources and Accounts Act 2000 and Managing Public Money.
- inquired of management, Government Legal Department's head of internal audit and those charged with governance whether:
 - they were aware of any instances of non-compliance with laws and regulations;
 - they had knowledge of any actual, suspected, or alleged fraud,
- discussed with the engagement team regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Government Legal Department for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions and bias in estimating accrued income. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Government Legal Department's framework of authority and other legal and regulatory frameworks in which the Government Legal Department operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Government Legal Department. The key laws and regulations I considered in this context included Government Resources and Accounts Act 2000, Managing Public Money, Supply and

Appropriation (Main Estimates) Act 2024, employment law, pensions legislation and tax legislation.

Audit response to identified risk

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Audit and Risk Assurance Committee concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board; and internal audit reports;
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business; and
- I addressed the risk of fraud in revenue recognition by assessing controls over preparation of accruals for unbilled time; testing the accuracy and cut-off of unbilled time including tracing to post year-end invoices and subsequent cash receipts where appropriate; and undertaking procedures to test the recoverability of the unbilled elements.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of my certificate.

Other auditor's responsibilities

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

Report

I have no observations to make on these financial statements.

Gareth Davies
Comptroller and Auditor General

Date: 7 July 2025

National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

Financial Statements

Statement of Comprehensive Net Income for the year ended 31 March 2025

		2024-25	2023-24
	Note	£000	£000
Income from sale of services	5	(387,692)	(343,543)
Other operating income	5	(5,880)	(5,916)
Total operating income		(393,572)	(349,459)
Staff costs	2	280,746	248,612
Purchase of goods and services	3	28,239	26,018
Rentals under operating leases	3	62	195
Non-cash costs	3	11,968	10,870
Disbursements	4	57,112	55,475
Total operating expenditure		378,127	341,170
Net operating income		(15,445)	(8,289)
Total comprehensive income for the year		(15,445)	(8,289)

All income and expenditure is derived from continuing operations.

The notes on pages 68 to 78 form part of these Accounts.

Statement of Financial Position

as at 31 March 2025

	Note	31 March 2025		31 March 2024	
		£000	£000	£000	£000
Non-current assets					
Property, plant and equipment	6	7,757		5,889	
Intangible assets	7	5		6	
Right of use assets	8	21,580		21,271	
Total non-current assets		29,342		27,166	
Current assets					
Trade and other receivables	10	53,523		57,557	
Cash and cash equivalents	11	25,310		11,269	
Total current assets		78,833		68,826	
Total assets			108,175		95,992
Current liabilities					
Trade and other payables	12	(65,677)		(51,031)	
Lease liabilities	13	(7,128)		(7,770)	
Provisions	14	(555)		(380)	
Total current liabilities			(73,360)		(59,181)
Total assets less current liabilities			34,815		36,811
Non-current liabilities					
Lease liabilities	13	(12,832)		(11,347)	
Provisions	14	-		(103)	
Total non-current liabilities			(12,832)		(11,450)
Total assets less liabilities			21,983		25,361
Taxpayers' equity					
General fund			21,983		25,361
Total Taxpayers' equity			21,983		25,361

The notes on pages 68 to 78 form part of these Accounts.

Susanna McGibbon KC (Hon)

Accounting Officer

4 July 2025

Statement of Cash Flows

for the year ended 31 March 2025

		2024-25	2023-24
	Note	£000	£000
Cash flows from operating activities			
Net operating income		15,445	8,289
Adjustments for non-cash transactions arising in the year	3	11,968	10,870
Decrease/(Increase) in trade and other receivables		4,034	(10,094)
Increase in trade and other payables*		786	4,736
IFRS 16: Interest		(2,061)	(391)
Use of provisions	14	(118)	-
Net cash inflow from operating activities		30,054	13,410
Cash flows from investing activities			
Purchase of property, plant and equipment	6	(5,176)	(2,340)
Purchase of intangibles	7	(5)	-
Net cash outflow from investing activities		(5,181)	(2,340)
Cash flows from financing activities			
Net financing from the Consolidated Fund after transfers to AGO and HMCPSI		(2,742)	8,652
IFRS 16: payment of lease liabilities for the principal		(5,963)	(8,453)
Contingencies Fund advance (to support working capital)		30,000	25,000
Repayment of Contingencies Fund advance		(30,000)	(25,000)
Net financing		(8,705)	199
Net increase in cash and cash equivalents in the period	11	16,168	11,269
Payment of amounts due to the Consolidated Fund		(2,127)	(12,465)
Cash and cash equivalents at the beginning of the period	11	11,269	12,465
Cash and cash equivalents at the end of the period	11	25,310	11,269

*The movement on payables excludes movements in payables relating to items not passing through the Statement of Comprehensive Net Income such as departmental balances with the Consolidated Fund or lease liabilities.

The notes on pages 68 to 78 form part of these Accounts.

Statement of Changes in Taxpayers' Equity for the year ended 31 March 2025

		General Fund	Total Reserves
	Note	£000	£000
Balance at 1 April 2023		19,605	19,605
Changes in taxpayers' equity for 2023-24			
Net financing after transfer to AGO and HMCPSI		8,652	8,652
Net parliamentary funding: deemed		12,465	12,465
Payment to the Consolidated Fund	11	(12,465)	(12,465)
Supply payable adjustment	12	(11,269)	(11,269)
Comprehensive net income for the year		8,289	8,289
Non-cash adjustments:			
Auditors' remuneration	3	84	84
Total changes in taxpayers' equity for 2023-24		5,756	5,756
Balance at 1 April 2024		25,361	25,361
Changes in taxpayers' equity for 2024-25			
Net financing after transfer to AGO and HMCPSI		(2,742)	(2,742)
Net parliamentary funding: deemed		11,269	11,269
Payment to Consolidated Fund	11	(2,127)	(2,127)
Supply payable adjustment	12	(25,310)	(25,310)
Comprehensive net income for the year		15,445	15,445
Non-cash adjustments:			
Non-cash charges – auditors' remuneration	3	87	87
Total changes in taxpayers equity for 2024-25		(3,378)	(3,378)
Balance at 31 March 2025		21,983	21,983

The General Fund represents the total assets less liabilities of the entity, to the extent that the total is not represented by other reserves and financing items.

The notes on pages 68 to 78 form part of these Accounts.

Notes to the Accounts

1. Statement of accounting policies

The financial statements have been prepared in accordance with the 2024-25 Government Financial Reporting Manual (FReM) issued by HMT. 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 most appropriate to the particular circumstances of the Government Legal Department (GLD) for the purpose of giving a true and fair view has been selected. The particular policies adopted by GLD are described below. They have been applied consistently in dealing with items considered material in relation to the Accounts.

In common with other government departments, the future financing of the department's liabilities is to be met by future grants of Supply and the application of future income, both to be approved annually by Parliament. After making enquiries, the Accounting Officer has a reasonable expectation that the department has adequate resources to continue in operational existence for a period of at least 12 months from the date the financial statements are authorised for issue.

The going concern basis of accounting for the department is adopted in consideration of the requirements set out in HM Treasury's Government Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future. For the above reasons it has been considered appropriate to adopt a going concern basis for the preparation of these financial statements.

1.1 Accounting convention

These Accounts have been prepared under the historical cost convention and where material modified to account for the revaluation of property, plant and equipment and intangible assets at their value to the business by reference to their current costs.

1.2 Material accounting judgments and estimates

The judgments applied to non-current asset balances with regard to asset lives and impairment reviews are set out in the separate accounting policies on these assets. Judgments relating to leases are set out in the leases accounting policy.

Most of the larger accruals included in the accounts within the working capital balances are routine and are based on system data rather than being the result of estimates or judgments applied by management. The main exception to this is the accrual included for legal disbursement costs yet to be invoiced to the department. As most of these costs are recharged to the department's clients both an expenditure and income accrual are included in the financial statements (£6.9m and £6.9m respectively), so the overall impact on net operating income is largely neutral. The accrual is based on an estimate of the level of outstanding disbursements costs at the financial year-end using historical transaction data. Actual results may differ from these estimates.

Provision balances are also subject to management estimates on the level of leasehold dilapidations. These balances are not currently significant. The value of untaken annual leave is also estimated on the basis of HR records and staff cost averages.

1.3 Income

Income relates directly to the operating activities of the department. It principally comprises fees and charges for legal services provided during the year by GLD to the other central government departments, agencies and arm's length bodies and recovery of disbursements incurred on their behalf. Fees and charges are set in accordance with HMT guidance set out in Managing Public Money. In addition, it includes other income such as charges for the administration costs of the Bona Vacantia Division, rental income and service charge, recovery of costs for recruitment and training services provided to other government departments.

This income has been recognised as follows in line with IFRS 15 principles:

- Fees for legal services which are charged as a fixed annual fee for the service provided in that year have been recognised in full for that financial year on the basis that when the year comes to an end the service has been fully provided.
- Fees for legal services which are charged on an hourly basis for provision of advice/casework have been recognised in line with the hours recorded by staff on chargeable work.
- Fees charged to recover costs incurred by GLD where it has been agreed that these will be passed straight onto customers are recognised in line with when those costs have been recognised by GLD.

Work in progress is recognised as operating income as incurred. This represents unbilled time charges which are valued at the appropriate rate, for the financial year in which the work was undertaken and the accrued cost of legal disbursements incurred to be recharged to clients.

1.4 Property, plant and equipment

Assets are carried at current value in existing use using depreciated historic cost as a proxy. The need for impairment is considered on an annual basis. Expenditure on plant, property and equipment over £5,000 is capitalised on an individual or group basis. On initial recognition they are measured at cost including any costs (such as installation) directly attributable to bringing them into working condition. The policy on right of use assets is disclosed in Note 1.10.

1.5 Depreciation

Plant, property and equipment are depreciated at rates calculated to write them down on a straight-line basis over their estimated useful lives. Leasehold improvements are depreciated over the term of the lease.

Assets under construction are not depreciated until they are in use. Once in use they are depreciated over their expected useful life.

Asset lives are normally within the following ranges:

- | | |
|------------------------------------|--|
| – Leasehold improvements | limited to period remaining on lease (up to 5 years) |
| – Right of use leasehold buildings | limited to period remaining on lease (up to 5 years) |
| – Furniture and fittings | 3, 5 or 10 years |
| – ICT network | 3 to 5 years |

1.6 Intangible assets

Purchased and internally developed software, purchased software licences and website costs are capitalised as intangible assets and are valued at depreciated historic cost as a proxy for fair value. The need for impairment is considered on an annual basis. Expenditure on intangibles over £5,000 is capitalised on an individual or group basis.

Intangible assets under construction are not amortised until they are in use. Once they are in use, they are amortised on a straight line basis over the life of the associated project or their expected useful economic life. Asset lives are normally within the following ranges:

- | | |
|------------------------|--------------|
| – Software development | 3 to 5 years |
| – Software licences | 3 to 5 years |
| – Website costs | 5 years |

1.7 Debt recovery

All aged debt is regularly reviewed to ascertain the continuing prospect of recovery and that it remains economical to continue to pursue recovery. Where recovery is considered doubtful or uneconomic, the department will provide for or write-off the debt by reducing the value of debtors within the Statement of Financial Position.

1.8 Pensions

Past and present employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS). This is a multi-employer scheme and it is not possible to separate the assets and liabilities, and is therefore accounted for in the same manner as defined contribution schemes. The defined benefit schemes are unfunded and are non-contributory except in respect of dependants' benefits. The department recognises the expected cost of providing pensions on a systematic and rational basis over the period during which it benefits from employees' services by payment to the PCSPS of amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on the PCSPS.

In respect of the defined contribution schemes, the department recognises the contributions payable for the year. Employer contributions for the financial year to 31 March 2026 are expected to be around £0.4m.

1.9 Contingent liabilities

Contingent liabilities are disclosed, where applicable, in the notes to the Accounts in accordance with IAS 37. Remote contingent liabilities that are not required to be disclosed by IAS 37 but are required to be reported to Parliament, where applicable, are included in the Accountability Report.

1.10 Leases

IFRS 16 "Leases" introduces a single lessee accounting model, removing the distinction between operating and finance leases and requiring a lessee to recognise 'right of use' assets and liabilities for all leases (apart from the exemptions included below). For government bodies reporting under the FReM, IFRS 16 was implemented on 1 April 2022 and replaced IAS 17 (Leases).

The department's leasing activities relate to being a lessee in respect of buildings occupied for operational purposes.

Assumptions

The definition of a contract is expanded to include intra-UK government agreements where non-performance may not be enforceable by law. This includes, for example, Memorandum of Terms of Occupation (MOTO) agreements.

The department has elected not to recognise right of use assets and lease liabilities for the following leases:

- intangible assets;
- non-lease components of contracts where applicable;
- low value assets (these are determined to be in line with capitalisation thresholds on Property, Plant and Equipment); and
- leases with a lease term of 12 months or less.

At inception of a contract, the department assesses whether a contract is, or contains, a lease. A contract is, or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration, including whether:

- The contract involves the use of an identified asset;
- The department has the right to obtain substantially all of the economic benefit from the use of the asset throughout the period of use; and
- The department has the right to direct the use of the asset.

The department assesses whether it is reasonably certain to exercise break or extension options at the lease commencement date. The department reassesses this if there are significant events or changes in circumstances that were not anticipated.

As a lessee

Right of use assets

The department recognises a right of use asset and lease liability at the commencement date. The right of use asset is initially measured at cost, which comprises the initial amount of the lease liability. The right of use assets are subsequently measured at current value in existing use in line with property, plant and equipment assets, using cost as a proxy for fair value as significant market fluctuations are not anticipated. The right of use asset is depreciated using the straight line method from the commencement date to the end of the lease term. The department applies

IAS 36 Impairment of Assets to determine whether the right of use asset is impaired and to account for any impairment loss identified.

Lease liabilities

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease, or if that cannot be readily determined, the rate provided by HMT. All leases in the department account have been discounted using the HMT discount rate. Leases in the department's accounts that commenced and were adopted into IFRS 16 before 1 January 2023 are discounted using the HMT discount rate of 0.95%. Leases entered into during 2023 are discounted using the HMT discount rate of 3.51%. Leases entered into during 2024 are discounted using the HMT discount rate of 4.72%.

The lease payment is measured at amortised cost using the effective interest method. It is re-measured when there is a change in future lease payments or if the department changes its assessment of whether it will exercise an extension or break option.

1.11 Taxation

Where VAT is recoverable by the department, amounts are included net of VAT. Irrecoverable VAT is included in operating costs and capital additions. The amount due to or from HM Revenue and Customs in respect of VAT is included within debtors or creditors as appropriate. Operating income is stated net of VAT.

1.12 Third party assets

The department holds various funds on behalf of its clients. These relate to ongoing legal processes. These balances are not recognised in the Statement of Financial Position but are disclosed in Note 17 to these Accounts.

1.13 IFRS issued but not yet effective

IFRS issued or amended but not yet effective including IFRS 17 have been reviewed and are not considered to impact on the financial statements. Changes to the 2025-26 FReM with respect to Social Benefits and the valuation of non-investment assets are not considered to impact on the financial statements.

1.14 Operating segments

GLD's income primarily relates to fees and charges for legal services provided during the year to clients from central government departments, agencies and arms length bodies. Government is treated as a single customer and therefore is treated as a single operating segment for reporting purposes.

2. Staff costs

	Permanently employed staff	Others	2024-25 Total	2023-24 Total
	£000	£000	£000	£000
Wages and salaries	181,379	-	181,379	161,770
Social security costs	20,786	-	20,786	18,582
Other pension costs	50,910	-	50,910	42,830
Sub Total	253,075	-	253,075	223,182
Agency and contracted staff	-	26,773	26,773	25,244
Inward secondments	-	898	898	186
Total	253,075	27,671	280,746	248,612

No staff costs have been charged to capital. Detailed disclosures on staff costs are included in the Staff Report.

3. Other expenditure

	2024-25 £000	2023-24 £000
Rentals under operating leases		
Other operating leases	62	195
	62	195
Non-cash items		
Depreciation	9,545	10,534
Amortisation	6	166
Increase in provisions	190	-
Release of provisions	-	(305)
IFRS 16: interest expense	2,061	391
IFRS 16: revaluation	79	-
External auditors' remuneration*	87	84
	11,968	10,870
Purchase of goods and services		
IT and communications costs	7,114	7,662
Accommodation	6,950	5,745
Library information services	4,317	3,258
Professional fees and external HR services	2,426	1,148
Training	2,210	1,818
Recruitment	1,770	2,057
Travel and subsistence	1,274	871
Welfare supplies and consumables	244	178
Postal services	241	252
Records management	171	142
Consultancy	50	517
Other	1,472	2,370
	28,239	26,018
Total other expenditure	40,269	37,083

*External auditors' remuneration represents the notional audit fees of £87k (2023-24: £84k) for the Government Legal Department Account. No non-audit services were provided during the financial year.

4. Disbursements

	2024-25 £000	2023-24 £000
Recoverable from client departments	54,244	51,190
Funded from Supply	530	710
Disbursements recovered from fixed fees	2,338	3,575
Gross expenditure	57,112	55,475

5. Income

	2024-25 £000	2023-24 £000
Income from sales of goods and services:		
Legal fees and charges to clients	331,219	290,855
Disbursement income	54,244	51,190
LION subscription	2,229	1,498
	387,692	343,543
Other operating income:		
Recovery of costs Bona Vacantia	4,861	4,731
Recovery of secondments out	382	258
Rental income	127	127
Other income	510	800
	5,880	5,916
Total income	393,572	349,459

6. Property, plant and equipment

	Leasehold improvements	ICT Network	Furniture and fittings	2024-25 Total
	£000	£000	£000	£000
Cost or Valuation				
At 1 April 2024	3,680	11,015	2,336	17,031
Additions	-	4,982	13	4,995
At 31 March 2025	3,680	15,997	2,349	22,026
Depreciation				
At 1 April 2024	2,341	7,362	1,439	11,142
Charge in year	263	2,703	161	3,127
At 31 March 2025	2,604	10,065	1,600	14,269
Carrying amount at 31 March 2025	1,076	5,932	749	7,757
Asset financing				
Owned	1,076	5,932	749	7,757
Leased	-	-	-	-
At 31 March 2025	1,076	5,932	749	7,757

	Leasehold improvements	ICT Network	Furniture and fittings	2023-24 Total
	£000	£000	£000	£000
Cost or Valuation				
At 1 April 2023	3,680	8,743	2,336	14,759
Additions	-	2,272	-	2,272
At 31 March 2024	3,680	11,015	2,336	17,031
Depreciation				
At 1 April 2023	2,071	5,207	1,185	8,463
Charge in year	270	2,155	254	2,679
At 31 March 2024	2,341	7,362	1,439	11,142
Carrying amount at 31 March 2024	1,339	3,653	897	5,889
Asset financing				
Owned	1,339	3,653	897	5,889
Leased	-	-	-	-
At 31 March 2024	1,339	3,653	897	5,889

	2024-25	2023-24
	£000	£000
Cash flow analysis for property, plant and equipment		
Property, plant and equipment additions	4,995	2,272
Movement in accruals for property, plant and equipment	181	68
Cash flows for property, plant and equipment	5,176	2,340

7. Intangible assets

	Software licences £000	2024-25 Total £000
Cost or Valuation		
At 1 April 2024	771	771
Additions	5	5
At 31 March 2025	776	776
Amortisation		
At 1 April 2024	765	765
Charge in year	6	6
At 31 March 2025	771	771
Carrying amount at 31 March 2025	5	5

	Software licences £000	2023-24 Total £000
Costs or Valuation		
At 1 April 2023	771	771
Additions	-	-
At 31 March 2024	771	771
Amortisation		
At 1 April 2023	599	599
Charge in year	166	166
At 31 March 2024	765	765
Carrying amount at 31 March 2024	6	6

8. Right of use assets

	Right of use building £000	2024-25 Total £000
Cost or Valuation		
At 1 April 2024	36,512	36,512
Additions	6,727	6,727
At 31 March 2025	43,239	43,239
Depreciation		
At 1 April 2024	15,241	15,241
Charge in year	6,418	6,418
At 31 March 2025	21,659	21,659
Carrying amount at 31 March 2025	21,580	21,580

	Right of use building £000	2023-24 Total £000
Cost or Valuation		
At 1 April 2023	34,279	34,279
Additions	2,233	2,233
At 31 March 2024	36,512	36,512
Depreciation		
At 1 April 2023	7,386	7,386
Charge in year	7,855	7,855
At 31 March 2024	15,241	15,241
Carrying amount at 31 March 2024	21,271	21,271

9. Financial instruments

As the cash requirements of the department are primarily met from income from clients (other government departments) and a limited amount through the Estimates process, financial instruments play a more limited role in creating risk than would apply to a non-public sector body of a similar size. The majority of financial instruments relate to contracts to buy in non-financial items in line with the department's expected purchase and usage requirements and the department is therefore exposed to little credit, liquidity or market risk.

10. Trade receivables and other current assets

Analysis by type	31 March 2025 £000	31 March 2024 £000
Amounts falling due within one year:		
Unbilled time	10,216	8,590
Unbilled disbursements	12,904	13,358
Trade receivables	26,030	31,873
Deposits and advances	272	314
Prepayments and accrued income	4,101	3,422
	53,523	57,557

11. Cash and cash equivalents

	2024-25 £000	2023-24 £000
Balance at 1 April	11,269	12,465
Payments of amounts due to Consolidated Fund	(2,127)	(12,465)
Net change in cash and cash equivalents	16,168	11,269
Balance at 31 March	25,310	11,269

All balances were held with the Government Banking Service as cash. There were no cash equivalents.

12. Trade payables and other current liabilities

Analysis by type	31 March 2025 £000	31 March 2024 £000
Amounts falling due within one year:		
VAT	11,322	12,503
Other taxation and social security costs	5,493	4,866
Trade payables and other payables	622	582
Accruals and deferred income	22,930	21,811
	40,367	39,762
Excess cash surrenderable to the Consolidated Fund	25,310	11,269
Total current payables and other liabilities	65,677	51,031

13. IFRS 16 Lease Liability

	2024-25 £000	2023-24 £000
Balance at 1 April	19,117	25,337
Lease additions	6,727	2,233
Lease revaluation	79	-
Lease payments made	(8,024)	(8,844)
Interest expense	2,061	391
Balance at 31 March	19,960	19,117
Obligations for the following periods comprise:		
Not later than one year	7,128	7,770
Later than one year and not later than 5 years	12,832	11,347
Later than 5 years	-	-
Current	7,128	7,770
Non-current	12,832	11,347

14. Provisions for liabilities and charges

	Other £000	Dilapidations £000	2024-25 Total £000	2023-24 Total £000
Balance at 1 April	95	388	483	788
Provided in year	190	-	190	-
Released in year	-	-	-	(305)
Utilised in year	(95)	(23)	(118)	-
Balance at 31 March	190	365	555	483

Analysis of expected timing of cash flows	2024-25 Total £000	2023-24 Total £000
Not later than one year	555	380
Later than one year and not later than 5 years	-	103
Later than 5 years	-	-
	555	483

15. Contingent liabilities

There were no contingent liabilities as at 31 March 2025 (31 March 2024: £nil).

16. Related party transactions

The department has had a significant number of material transactions with other government departments and public agencies since the nature of the department's business is to provide legal services to central government. Most of these transactions have been with: Home Office, Ministry of Justice, Ministry of Defence, Department for Business and Trade, Department of Health and Social Care, Cabinet Office, Department for Work and Pensions, Foreign, Commonwealth and Development Office, Department for Transport, Department for Education, HM Revenue and Customs, Department for Environment, Food and Rural Affairs, Ministry of Housing, Communities and Local Government, HM Treasury, Department for Energy Security and Net Zero, Department for Science, Innovation and Technology and Department for Culture, Media and Sport.

Government Legal Department has no parent department, but does transact with the Attorney General's Office and HM Crown Prosecution Services Inspectorate with whom it shares a Parliamentary Supply Estimate; details of these transactions are included in Note 2 of HM Procurator General and Treasury Solicitor Annual Report and Accounts.

The Treasury Solicitor, by virtue of the Treasury Solicitor Act 1876, is also the Crown's Nominee.

One Board member, Richard Cornish, Chief Operating Officer, has a related party connection to Insight Direct (UK) who are a supplier to GLD in respect of technology hardware and software. Expenditure with Insight for 2024-25 was £3.8m. Whilst this connection is not expected to result in a conflict of interest, to ensure that there is no conflict of interest, Richard Cornish will have no direct involvement in the procurement of services that Insight might bid for or management of existing contracts with this supplier.

No other Board members, or key managerial staff, or their related parties, has undertaken any material transactions with GLD during the year. Board members' remuneration is disclosed in the Remuneration Report.

17. Third party assets: client monies

Funds are required in advance from clients to enable settlement of awards for damages and contributions toward the cost of court proceedings. The department places these funds on deposit until the final costs of a case have been calculated and settled. These are not departmental assets, as the funds are held on behalf of third parties and as a consequence do not appear in these Accounts. As at 31 March 2025, these amounted in total to £36,548k (31 March 2024: £48,319k). An analysis of the movements on these funds is shown in the below:

	2024-25 £000	2023-24 £000
Opening balance at 1 April	48,319	12,996
Gross inflows	135,994	148,846
Gross outflows	(147,765)	(113,523)
Closing balance at 31 March	36,548	48,319

These balances are held with the Government Banking Service.

18. Events after the reporting period

In accordance with the requirements of IAS 10, events after the reporting period are considered up to the date on which the Accounts are authorised for issue by the Accounting Officer. This is interpreted as the date of the Certificate and Report of the Comptroller and Auditor General. There are none to report.

Annex A: Sustainability Report for the year ended 31 March 2025

Task Force on Climate-related Financial Disclosure (TCFD) Compliance Statement

The disclosure requirements for the second year of implementation are that in-scope reporting entities must include the following and it is noted how we comply under each section:

Compliance statement

Government Legal Department (GLD) has reported on climate-related financial disclosures consistent with HM Treasury's TCFD-aligned disclosure application guidance, which interprets and adapts the framework for the UK public sector. Climate considerations are incorporated into GLD's principal risks on Property, Business Continuity and Security. GLD has therefore complied with the TCFD recommendations and recommendations disclosures around:

- Governance - recommended disclosures (a) and (b)
- Risk Management - recommended disclosures (a) to (c)
- Metrics and Targets - recommended disclosures (a) to (c)

Disclosures

- (a) a description of the Board's oversight of climate-related issues.

Climate-related issues are included in the GLD Strategy 2024-2027 and is included within the section 'An Environment Fit for the Future'. This has resulted in sustainability being included within the overall business plan and all activity included in the business plan is reported to the Board at regular intervals. This is via the Quarterly Strategic Report reported to Executive Committee through a balanced score card to ensure there is sufficient progress on the business plan and that GLD is on track to meet its targets it has set itself. There is also a Sustainability Champion at Board level, Carmel Thornton, Finance, Operations and Digital Director.

- (b) a description of management's role in assessing and managing climate-related issues.

Managing risk is an important part of GLD's management function. The Audit and Risk Assurance Committee (ARAC) report to the Board and supports the Treasury Solicitor (in its capacity as GLD's Accounting Officer) in discharging her responsibilities in relation to financial reporting, audit, risk management, internal control security and the integrity of financial statement. In taking decisions and managing our risks, we consider the impact on climate and sustainability. ARAC's role is to escalate any risks that are not being managed to the Board for action, ensuring the risk appetite is regularly assessed and that the risk is being managed in an appropriate manner.

Climate considerations are incorporated within the GLD risks on Property, Business Continuity and Security. The risk register is to be reviewed in 2025-26 to incorporate situational analysis of simulations within and above the critical 1.5 Celsius threshold, over a timespan of 3, 5 and 10 years and include stress-testing of climate related risks and issues alongside their respective mitigation measures. This will include a business continuity exercise scenario centred on a climate related incident (eg extreme weather). Risk plans and mitigations are included in the Governance Statement on page 42.

- where available as part of an entity's existing reporting processes, the TCFD Metrics and Targets recommended disclosure (adapted):

- (c) Scope 1, Scope 2, and, Scope 3 - business travel only greenhouse gas (GHG) emissions. This aligns with existing requirements in the Sustainability Reporting Guidance (SRG). Please see the Sustainability Reporting section below.

This is in line with the central government's TCFD-aligned disclosure implementation timetable. GLD plans to make disclosures for Strategy, Risk Management and Metrics and Targets disclosures (a) and (c) in future reporting periods in line with the central government implementation timetable.

Sustainability Reporting

Overall Greening Government Commitment Performance

GLD's Strategy 2024-2027 (launched spring 2024), under the headline "An Environment Fit for the Future", states that "we will meet enhanced sustainability targets, achieving our commitment to reduce emissions by 2030 and achieve net zero by 2050".

We lost our fulltime Sustainability Lead during this financial year and are currently in the process of recruiting a replacement. However, we have still been able to take some work forward, including the development of a Sustainable Procurement Policy and signing up to the Greener Litigation Pledge.

Greener Litigation is an initiative to reduce the environmental impact of dispute resolution and is a commitment to action by solicitors' firms, barristers' chambers and other disputes professionals. In support of this commitment, we have improved our internal data monitoring and introduced monitoring and holding to account of panel law firms working on behalf of GLD.

We have a large, active Greener GLD staff network comprising about 15% our workforce, who have championed sustainability issues and been a critical friend. They have several working groups that tackle issues such as Sustainable Procurement, Green Volunteering, Green Communications and support wider Civil Service collaboration with the Civil Service Climate and Environment Network.

Scope of reporting

Performance reported is in line with the minimum reporting requirements for Greening Government Commitments (GGC) (data for previous 4 years plus the 2017-18 baseline). Where a GGC measure is not applicable to GLD, this has been stated.

GLD is a minor tenant in all buildings occupied and therefore is not the key decision maker with regard to most areas covered by GGC. However, as in previous years, in excess of minimum reporting requirements, we have attempted to report data for the department's share of occupied buildings where that data is available.

Most data included is only available at a building level as there is not separate meterage in place for sub-tenants, so the data has been apportioned based on our occupation percentage. The only data included which is based on departmental actuals rather than an apportionment, is in respect of Scope 3 Emissions (expenditure on business travel) and paper consumption where records from our internal print room have been used.

The data reported covers occupancy at the GLD central London office 102 Petty France and our Bristol Office. Data hasn't been included the GLD office space in Croydon, Leeds or our occupancy at New Bailey in Salford. GLD is a minor tenant in these buildings and therefore the major occupier/leaseholder should report data for these sites.

The following reporting areas set out in the minimum reporting requirements are not applicable to the department:

- Nature Recovery and Biodiversity action planning - no significant natural capital or landholdings are held.
- Sustainable Construction - no construction or refurbishment projects have been undertaken during the reporting period.
- Scope 1 Emissions (Direct) – GLD occupies shared buildings so energy usage is indirect under Scope 2.
- Travel Car Fleet – GLD does not own, hire or lease car fleets.

Waste minimisation and management		Baseline 2017-18	2020-21	2021-22	2022-23	2023-24	2024-25
Non-Financial Indicators (tonnes)	Non recycled	-	-	-	7	7	-
	Reused/recycled	105	35	6	45	19	26
	Incinerated with energy recovery	25	6	1	1	7	11
	Incinerated without energy recovery	-	-	2	-	-	-
	Total waste	130	41	9	53	33	37
Financial Indicators (£)	Total disposal cost	28,606	6,560	4,399	8,480	5,495	7,519

Performance commentary:

The GGC waste target is to reduce the overall amount of waste generated by 15% from the 2017-18 baseline.

Overall waste has been lower than the baseline for 2024-25 primarily due to the reduced occupancy at our sites. All waste is either recycled or incinerated with energy recovery.

Single use plastics: GLD does not run any catering establishments or consumer venues selling products which may include single use plastics; however, staff are able to use catering facilities provided in shared buildings. Recycling facilities are provided in GLD buildings.

Reducing Environmental Impacts from ICT and Digital: GLD Digital Data and Technology (DDaT) function continues to responsibly deal with our ICT waste in accordance with Waste Electrical and Electronic Equipment (WEEE) Directive 2006 and through the engagement of our contractor, who is fully accredited by the Environmental Agency and ISO 14001.

Our Data Server estate is based at a Crown Hosted site. This allows us to take advantage of new electricity power supplies which use 100% Renewable energy.

Mitigating climate change: working towards Net Zero by 2050		Baseline 2017-18	2020-21	2021-22	2022-23	2023-24	2024-25
Non-Financial Indicators (tCO ₂ e)	Gross Emissions Scope 2 - Energy indirect	1,562	636	427	195	588	593
	Gross Emissions Scope 3 - Official Business Travel	104	30	3	13	60	105
	Total Greenhouse Gas Emissions	1,666	666	430	208	648	698
Related Energy Consumption (KWh)	Electricity	2,572,766	2,206,899	1,211,498	1,005,904	2,096,620	2,065,379
	Gas	-	418,448	416,681	383,016	800,604	701,314
	Oil	826,235	-	-	-	-	-
	Total KWh	3,399,001	2,625,347	1,628,179	1,388,920	2,897,224	2,766,693
Financial Indicators (£)	Total expenditure on energy	306,133	333,033	442,355	346,497	669,253	639,100
	Expenditure on official business travel	494,053	125,501	60,711	318,963	592,016	998,567

In terms of air travel 926,046 km were travelled of which 76,178 km were on domestic flights. and 849,868 km were on international flights (2023-24: 570,000 km were travelled of which 53,000 km were on domestic flights. and 517,000 km were on international flights). For international flights 717,324 km were long haul and 132,544 km were short haul (2023-24: 404,000 km were long haul and 113,000 km were short haul).

Performance commentary:

The GGC is to:

Reduce the overall Greenhouse Gas Emissions from a 2017-18 baseline and also reduce direct greenhouse gas emissions from estate and operations from a 2017-18 baseline, working towards net zero by 2050.

Building use and business travel have continued to return to pre-pandemic levels, resulting in a consequential increase in emissions. Business travel has also increased due to GLD being a more geographically dispersed department. However, overall emissions (tCO₂e) have still fallen 60% below baseline.

Finite Resource Consumption		Baseline 2017-18	2020-21	2021-22	2022-23	2023-24	2024-25
Non Financial Indicators	Water consumption (m ³)	7,683	2,124	618	1,793	7,325	5,727
	Paper consumption (A4 Reams)	27,881	1,949	2,785	5,829	6,387	9,988
Financial indicators (£)	Water supply and disposal cost	17,511	5,642	3,944	1,228	2,586	2,232

Performance commentary:

The GGC targets are to:

- Reduce water consumption by at least 8% from the 2017-18 baseline
- There is a sub-target to reduce government's paper use by at least 50% from a 2017-18 baseline.

Paper consumption is 65% below the baseline due to staff making greater use of digital formats.

Water consumption is 25% below baseline and water supply and disposal cost is 87% below baseline.

Sustainable procurement

Sustainability is an intrinsic element of the GLD procurement processes.

GLD uses Crown Commercial Service Frameworks for the majority of procurements, which have sustainability factored into the appointment of providers. For procurements that we conduct, we receive a Social Value statement and include Social Value as 10% of score for the evaluation of providers.

Examples of the success of this include our procurement for printing services this year. This has enabled us to procure more efficient machines, with energy saving innovations such as using less power, and switching to 'sleep mode' after 10 minutes inactivity. Another example is our procurement of the recycling of IT kit.

We are currently preparing a business case for a large-scale procurement to move from hosting our own data centres on GLD premises to the use of cloud-based data centre services. This will mean that we can benefit from the environmental innovations of specialist providers in this field.

In addition to this, GLD has been involved in designing the Social Value evaluation criteria for the Crown Commercial Service procurement for the new Legal Panel for Government, working with our 'Greener GLD' network to design criteria that are applicable and relevant to law firms, in line with PPN 06/20.

In 2025-26 it is our intention to develop how we include Social Value in our procurement activity further, in line with supporting the National Procurement Policy Statement and the government mission to Make Britain a Clean Energy Superpower.

The Greener Litigation Pledge

As noted at the start of this appendix, GLD has recently signed the Greener Litigation Pledge. Greener Litigation is an initiative to reduce the environmental impact of dispute resolution. The pledge is a commitment to action by solicitors' firms, barristers' chambers and other disputes professionals.

Greener Litigation's principal objective is to support the courts and court users in becoming carbon neutral and to encourage lasting change in litigation practice. Its initial focus was on the courts of England and Wales, but since its launch in 2021, there has been growing international interest to join and grow the initiative.

In signing the Greener Litigation Pledge, GLD's Litigation Group is committing to take active steps to reduce the environmental impact of our practice, and to the reduction of our emissions in line with the Greening Government Commitments.

Glossary

AGO	Attorney General's Office
ARAC	Audit and Risk Assurance Committee
CETV	Cash Equivalent Transfer Value
CO	Cabinet Office
DEL	Departmental Expenditure Limit
DBT	Department for Business and Trade
FCDO	Foreign, Commonwealth and Development Office
GGC	Greening Government Commitments
GLD	Government Legal Department
GLP	Government Legal Profession
HMCPSP	His Majesty's Crown Prosecution Service Inspectorate
HMT	His Majesty's Treasury
HR	Human Resources
ICT	Information and communications technology
Lexcel	Law Society's Practice Quality Mark
LION	Legal Information Online Network
MoD	Ministry of Defence
MHCLG	Ministry of Housing, Communities and Local Government
NAO	National Audit Office
OPC	Office of the Parliamentary Counsel
PSCPS	Principal Civil Service Pension Scheme
SCS	Senior Civil Service
SI	Statutory Instrument
WEEE	Waste Electrical and Electronic Equipment