Insolvency Services and the Insolvency Services Investment Accounts 2024-25

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Foreword

Statutory background

The Insolvency Act 1986 (“the Act”) requires the preparation of two financial statements:

- The Secretary of State is required to prepare a statement of sums received and paid out by him through the Insolvency Services Account (“the ISA”) for each year ending 31 March, in such form and manner as the Treasury may direct (Section 409(2) of the Act).
- The Commissioners for the Reduction of the National Debt (CRND) are required to prepare a statement of the sums debited and credited to the Insolvency Service Investment Account (the Investment Account) for each year ending 31 March, in such form and manner as the Treasury may direct (Section 409(1) of the Act).

The two financial statements are shown in separate sections of this report.

The Insolvency Services Account (“the ISA”)

The Insolvency Regulations 1994, as amended, (the Regulations) require Official Receivers and Insolvency Practitioners to pay into the ISA at the Bank of England money received by them during their administration of bankruptcies and compulsory liquidations. Voluntary liquidators may deposit funds into the ISA. The Regulations also provide for payments from the ISA of disbursements, expenses, and distributions to creditors and to contributories in company liquidations (Regulations 7, 8, 22 and 23). Estate monies deposited in the ISA are generally transferred to the Investment Account (Section 403(2) of the Act) although the Regulations provide that trustees and liquidators may request investment in Government Securities of estate monies not required for immediate purposes (Regulation 9(1) & 23A).

The Insolvency Service Investment Account (“the Investment Account”)

This account is kept by CRND at the Bank of England. CRND’s main function is the investment and management of major Government funds. The investment powers differ from fund to fund.

The Secretary & Comptroller General and Assistant Comptroller, who are appointed by and act on behalf of the Commissioners, make the day-to-day decisions. There is no legislation that determines the specific responsibilities of the Secretary & Comptroller General or the Assistant Comptroller. However, in practice the role of the Secretary & Comptroller General is considered analogous to acting as the Accounting Officer for CRND. Therefore, the Secretary & Comptroller General takes responsibility for preparing and signing the accounts on behalf of the Commissioners.

CRND may invest any money standing to the credit of the Investment Account in accordance with the Trustee Investments Act 1961 and Treasury directions.

Income earned on these investments is used to pay interest and tax under the regulations to individual estates. Investments are realised to make repayments to the ISA to meet the demands in respect of bankrupts' or companies' estates. The ISIA account is shown in a separate section of this joint report.

The Official Receiver deals with the administration of personal bankruptcy and company compulsory liquidation cases. Creditors, or the Secretary of State, may appoint an Insolvency Practitioner to replace the Official Receiver as trustee in bankruptcy (personal insolvency) or liquidator (corporate insolvency). In either case, the Official Receiver or Insolvency Practitioner must pay any receipts arising in the insolvency into the Insolvency Service Account (The ISA).

Insolvency Practitioners are also appointed to administer voluntary liquidation cases. This can be a members' voluntary liquidation (for solvent companies) or a creditors' voluntary liquidation (for insolvent companies). Voluntary liquidations do not involve the Official Receiver. Insolvency Practitioners appointed to administer voluntary liquidations may make payments into the ISA although the regulations differ to those governing the payments made by trustees and liquidators of compulsory insolvencies. The Insolvency (Amendment) Regulations 2011 which came into force on 1 October 2011 prevents the payment of monies into the Insolvency Services Account except where payments have already been made into the Insolvency Services Account in relation to a voluntary liquidation which occurred before 1 October 2011. Any unclaimed Monies remain unaffected by this change.

Aims and objectives

The ISA is administered by the Estate Accounts & Scanning (EAS) team of the Insolvency Service. EAS provide estate accounting and investment services for bankruptcy and liquidation estate funds by:

- Delivering a high standard of service to all users of the ISA;
- Listening to the views of users about the administration of the ISA;
- Making use of new technology to improve efficiency and extend the range of services provided;
- Working with colleagues across the insolvency sector to minimise the regulatory burden on users of the ISA, within the statutory framework; and
- Ensuring systems are in place to correctly charge statutory insolvency fees to estates and to process the recovery of these fees.

The key aims and objectives of the CRND relevant to the ISA are:

- To maintain sufficient liquid funds to meet expected payments;
- To maintain capital (nominal) cover over the Investment Account's liability to the Insolvency Service;
- To invest in secure, short-dated money market instruments and UK Government bonds, to maintain capital value and access to liquidity; and
- To ensure that income earned, over time, is sufficient to cover the interest due to trustees and liquidators on money deposited into the ISA.

1 Review of activities

Transactions

The Insolvency Services Account

Receipts of estate funds into the ISA increased in 2024-25 by £9.2 million to £438.0 million (2023-24: £428.8 million). Payments increased by £111 million to £581.5 million (2023-24: £469.7 million).

It's difficult to equate the movement to specific factors such as case volume or large insolvencies as it relates to realisations of assets on insolvencies during the reporting period, and insolvencies can span multiple years.

The distribution of the Payment Protection Insurance (PPI) monies is progressing well. To date 50,613 cases have had distributions completed, with a distributable value of £107.0 million returned to creditors and third parties. The agency has generated time & rate fees of £18.6 million from this work. The final PPI settlements are being concluded, without which the full scale of the project cannot be projected.

Banking

The Government Banking Service (GBS), part of HM Revenue and Customs (HMRC), provides retail banking transactions for the ISA. GBS and its supplier banks are commercially bound by a memorandum of understanding. During the year the payable order system for paper-based payments has continued to deliver a high level of security, with no reported instances of financial fraud. BACS payments are used when sufficient payee information is provided.

Interest paid to estates

The rate of interest paid on sums deposited in the ISA have changed during the reporting period, matching the Bank of England base interest rate.

Interest rate amendments are published in the London Gazette pursuant to Regulation 9(6) & 23A (6). The rate of interest is subject to regular review by EAS and the CRND.

- 5.25% from 10th August 2023
- 5.00% 8th August 2024 to 13th November 2024
- 4.75% from 14th November to 12th February 2025
- 4.50% from 13th February 2025

Fees

EAS is responsible for ensuring that the correct fees are charged and collected on bankruptcies, compulsory liquidations and any voluntary liquidation holding an account in the ISA.

Fees accrued by the Insolvency Service are shown in the separately prepared Insolvency Service Annual Report and Accounts.

Fee recovery increased in 2024-25 by £15.6 million to £73.1 million. (2023-24: £57.5 million).

Key performance indicator

The key performance indicator of EAS is to ensure 98.0% of ISA payments are made within 2 working days. (2023-24: 98.0%)

98.2% of payments were made within 2 days. (2023-24: 97.0%). Additional information is presented in our Governance Statement.

2 Forward look

EAS will seek to maintain high standards of delivery throughout 2025-26.

EAS will be working closely with the Future Case Management Capability project to ensure the successful delivery of the new case management system in 2025.

3 Preparation and audit

The financial statements are prepared by the Insolvency Service (an Executive Agency of the Department for Business & Trade), which is responsible for administering the accounts on behalf of the Secretary of State. The costs of administering the accounts are borne by the Insolvency Service.

The financial statements are audited by the Comptroller and Auditor General. The audit fee of £45,500 for the audit of the ISA for 2024-25 is included within the £251,500 audit fee disclosed in the Agency Accounts.

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

Statement of the Chief Executive's responsibilities

Under the Insolvency Act 1986, HM Treasury has directed the Insolvency Service 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 a receipts and payments basis and must properly present the state of affairs of the Insolvency Services Account, its Receipts and Payments and Statement of Balances for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of HM Treasury's Accounts Direction and in particular to:

- observe the Accounts Direction issued, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- prepare the Insolvency Services Account (ISA) on a going concern basis;
- make judgements and estimates on a reasonable basis; and
- confirm that the Insolvency Services Account (ISA) as a whole is fair, balanced and understandable and take personal responsibility for the ISA and the judgements required for determining that it is fair, balanced and understandable.

The Department for Business & Trade has appointed the Interim Chief Executive as Accounting Officer of the Insolvency Service.

The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, and for keeping proper records and for safeguarding the Insolvency Service's assets, are set out in Managing Public Money published by HM Treasury.

As the 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 the Insolvency Service's auditors are aware of that information. So far as I am aware, there is no relevant audit information of which the auditors are unaware.

Alec Pybus
Interim Chief Executive
10 September 2025

Governance Statement

Framework

The Insolvency Act 1986 (the Act) requires the preparation of a statement of sums received and paid out through the Insolvency Service Account (ISA) for each year ending 31 March, in such form and manner as the Treasury may direct (Section 409(2) of the Act).

As Accounting Officer, the Chief Executive has personal responsibility and accountability to Parliament for the organisation and quality of management within the organisation, including its use and stewardship of public assets. This responsibility includes safeguarding public funds and assets, in accordance with HM Treasury guidance, in particular Managing Public Money.

This Governance Statement is prepared specifically for the ISA. The Insolvency Service also prepares a Governance Statement for its Annual Report and Accounts which includes more information about the internal control framework across the whole agency, including the ISA.

Operation

The day-to-day operation of the ISA is undertaken by Estate Accounts and Scanning (EAS) which is a unit within the Business Services Directorate (BSD). EAS has in place guidance and appropriate training for all staff to deliver their respective functions and system controls that utilise both IT and physical security measures. There are also systems for communication with all staff, including on policy, operational and financial matters, and for informing them of new developments and key issues. EAS use the principles of continuous improvement to provide assurance that processes remain effective. The Director of the Business Services Directorate is part of the Executive Leadership Team and is subject to the governance and wider control system that is described in the Insolvency Services Annual Report and Accounts 2024-25.

EAS receives advice and guidance from the agency's corporate governance and technical teams, Government Internal Audit Agency (GIAA) and the Audit and Risk Assurance Committee as and when required.

Risk Management and Internal Control

The system of internal control, managed through BSD, is in place to manage risks to service delivery, fraud, transaction errors, and cyber security. The system of internal control is based on an ongoing process to identify and prioritise the risks to the overall management of the ISA; to evaluate the likelihood and impact of those risks being realised; and to manage them efficiently and effectively. Risk is managed by identifying and evaluating risks and implementing appropriate control measures, which are set out in the EAS Risk Register and escalated to the BSD Risk Register and Agency risk register as appropriate.

The system of controls to provide security to the ISA includes:

- a budget and Business Plan which defines priorities, key targets and accountability for delivery;
- systematic identification and management of risks through a Risk Register linked to the Business Plan;
- standardised processes and procedures set out in internal desk instructions;
- segregation of duties in key areas such as post opening and cheque and cash handling;
- a system of internal management checks and process audits;
- procedures for handling paper valuables and cheques received during post opening to account for all valuable items in a secure way and ensuring there is a clear audit trail;
- management arrangements including a system of delegated financial authorities for all case related payments made by EAS;
- assurance gained from internal audit work undertaken during the year; and
- the senior subject matter expert in Business Services Directorate is the Information Asset Owner for all information held by EAS.

The Audit and Risk Assurance Committee is chaired by an appropriately qualified independent non-executive Board Member. Its membership comprises of two further non-executive Board Members. The Chief Executive and Finance, Commercial, Sustainability and Property Director, and internal and external auditors, attend the meetings. Other Senior Leaders attend as required.

Internal audit is delivered by the Government Internal Audit Agency (GIAA) and their annual audit programme is substantially informed by the agency's key risks. The internal control framework was delivered through our in-house internal audit/management checking functions.

Risk assessment and issues

The Risk Register for 2024-25 records main areas of risk to the work of EAS as:

- Our ability to service stakeholder demands due to high rates of attrition, and the loss of experienced colleagues.
- Manual inputting risks and human errors which results in a payment being made to an incorrect payee, resulting in rework/recovery action, fruitless payments and reputational and financial damage.
- Risk was also identified in relation to the impact on EAS of diverting expertise in preparation for an upgrade to the agency's main case management system whose go live date is targeted for Autumn 2025.

These risks continued to be managed during the year, and the actions taken to mitigate the risks included:

- implementing a comprehensive cross team training plan to ensure we had flexibility in the workforce;
- recruitment campaigns to fill vacant posts;
- prioritisation of work across the various resolver groups within EAS;
- dedicated expert resource provided to the new case management system project; and
- the use of contingent labour and temporary cover to minimise impact on operational activity.
- A full review of payment controls in place and the addition of a second-tier approval check for off system CHAPS and SWIFT payments.
- Taking steps to professionalise the EAS workforce with entry level finance qualifications in the form of AAT level 2 and 3.

Significant issues

There were six significant payment errors that occurred during 2024/25 as a result of inputting errors. All of these funds have been recovered, and additional controls have been implemented which have prevented any further occurrences. The additional controls continue to be reviewed and progressed through 2025/26.

My appointment as CEO

My predecessor Dean Beale ceased to be Chief Executive Officer and left the Agency in May 2025. I am satisfied that my transition to Interim Chief Executive and Accounting Officer, which took place in May 2025, and the handover arrangements which included meetings with my predecessor were sufficient for me to provide assurance that a sound system of internal control was in place for the year as a whole. I conclude that our agency has satisfactory governance and risk management systems with effective plans to ensure continuous improvement.

Alec Pybus
Interim Chief Executive
10 September 2025

The Certificate and Report of the Comptroller and Auditor General to the Houses of Parliament

Opinion on financial statements

I certify that I have audited the financial statements of the Insolvency Services Account for the year ended 31 March 2025 under the Insolvency Act 1986.

The financial statements comprise the Insolvency Services Account's:

- Statement of Balances as at 31 March 2025;
- Receipts and Payments 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 accounts direction given by HM Treasury in accordance with the Insolvency Act 1986.

In my opinion, the financial statements:

- properly present the Insolvency Services Account's receipts and payments for the year ended 31 March 2025; and
- have been properly prepared in accordance with the Insolvency Act 1986 and HM Treasury directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the receipts and payments 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 (2024)*. 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 Insolvency Services Account 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 Insolvency Services Account'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 Insolvency Services Account'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 Chief Executive as the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

Other information

The other information comprises information included in the Insolvency Services Account but does not include the financial statements and my auditor's certificate and report thereon. The Chief Executive as 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, based on the work undertaken in the course of the audit, the information given in the Foreword 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 Insolvency Services Account and its environment obtained in the course of the audit, I have not identified material misstatements in the Foreword, Statement of the Chief Executive's Responsibilities and the Governance Statement.

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 Insolvency Services Account 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 are 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 Chief Executive as the Accounting Officer for the financial statements

As explained more fully in the Statement of the Chief Executive'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 Insolvency Services Account 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 are in accordance with the applicable financial reporting framework;
- assessing the Insolvency Services Account'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 Chief Executive as the Accounting Officer anticipates that the services provided by the Insolvency Services Account 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 Insolvency Act 1986.

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 Insolvency Services Account's accounting policies;
- enquired of management, the internal auditors and those charged with governance, including obtaining and reviewing supporting documentation relating to the Insolvency Services Account'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 Insolvency Services Account's controls relating to the Insolvency Services Account's compliance with the Insolvency Act 1986 and Managing Public Money;
- enquired of management, the internal auditors 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 Insolvency Services Account for fraud and identified the greatest potential for fraud in the following areas: posting of unusual journals and complex transactions. 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 Insolvency Services Account's framework of authority and other legal and regulatory frameworks in which the Insolvency Services Account 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 Insolvency Services Account. The key laws and regulations I considered in this context included the Insolvency Act 1986 and Managing Public Money.

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 reviewed minutes of meetings of those charged with governance and the Board; and internal audit reports; and
- In addressing the risk of fraud through management override of controls, I tested the appropriateness of journal entries and other adjustments; and evaluated the business rationale of any significant transactions that are unusual or outside the normal course of business.

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 receipts and payments 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

10 September 2025

National Audit Office
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London
SW1W 9SP

The Insolvency Services Account Receipts and Payments for the Year ended 31 March 2025

	Note	2024-25 £'000	2023-24 £'000
Receipts			
Estates funds received in relation to compulsory insolvencies and voluntary liquidations		438,041	428,804
Frequent Petitioners	11	4,584	4,730
From the Investment Account	2	469,000	444,000
Unclaimed dividends	6	16,022	12,293
Interest received	3	35,131	36,823
		962,778	**926,650**
Payments			
Payments requested by liquidators and trustees of estates in compulsory insolvency and voluntary liquidation and reissued dividends		581,452	469,714
To the Investment Account			
Excess cash balances on the ISA	2	295,500	280,000
Interest on ISA working balances	3	1,160	1,166
To the Consolidated Fund	7	27,500	0
To the Insolvency Service	4	61,926	176,909
		967,538	**927,789**
Excess of payments over receipts	9	**4,760**	**1,139**

The notes on pages 22 to 26 form part of these accounts.

The Insolvency Services Account Statement of Balances as at 31 March 2025

	Note	2024-25 £'000	2023-24 £'000
Balances:			
The Investment Account	2	1,019,200	1,192,700
Cash at Bank	9	14,381	19,141
		1,033,581	**1,211,841**
Representing:			
Insolvency Estates	10	706,376	931,298
Frequent Petitioners	11	(862)	(218)
Fees due to the Insolvency Service	4	197,541	186,297
Indemnified Disbursement	12	(19,530)	(52,635)
Unclaimed Dividends	6	118,158	119,599
Amount due to the Consolidated Fund	7	31,895	27,500
Amounts due to the Treasury Solicitor	8	3	0
		1,033,581	**1,211,841**

The notes on pages 22 to 26 form part of these accounts.

Alec Pybus
Interim Chief Executive
10 September 2025

Notes to the accounts

1 Accounting Policies

The accounts have been prepared on a receipts and payments basis.

2 The Investment Account

	2024-25	2023-24
	£'000	**£'000**
Balance at 1 April	1,192,700	1,356,700
Cash deposited with CRND	295,500	280,000
	1,488,200	1,636,700
Cash withdrawn from CRND	(469,000)	(444,000)
Balance at 31 March	**1,019,200**	**1,192,700**

The Insolvency Act 1986, S.403 (2), Part XIV Public Administration (England and Wales), Insolvency Service finance, accounting, and investment states:

Whenever the cash balance standing to the credit of the Insolvency Services Account is in excess of the amount which in the opinion of the Secretary of State is required for the time being to answer demands in respect of bankrupts' estates or companies' estates, the Secretary of State shall:

i) notify the excess to the National Debt Commissioners; and

ii) pay into the Insolvency Services Investment Account ("the Investment Account") kept by the Commissioners with the Bank of England the whole or any part of the excess as the Commissioners may require for investment in accordance with the following provisions of this part.

3 Interest Received and Paid

Interest Received

		2024-25	2023-24
	Note	**£'000**	**£'000**
On cash deposited with CRND	10	33,971	35,657
On working Balances at the bank		1,160	1,166
On Government Securities		0	0
Balance at 31 March		**35,131**	**36,823**

Interest received from investments is for the benefit of the specific case for which the investment was purchased. Interest received from ISIA and the ISA is apportioned between all interest-bearing estates based on the monies held in the estate over the period. The rate applied is advertised in the London Gazette and is based on the Bank of England Bank Rate. Interest Paid represents interest earned outside the ISIA being paid from the ISA to the ISIA.

Interest Paid

	2024-25 £'000	2023-24 £'000
Balance at 1 April	0	0
Interest earned during the year	1,160	1,166
Amount paid over during the year	(1,160)	(1,166)
Balance at 31 March	**0**	**0**

4 Due to the Insolvency Service

	Note	2024-25 £'000	2023-24 £'000
Balance at 1 April		186,297	305,684
Fees and VAT charged to estates in insolvency	10	73,148	57,498
Fees on unclaimed dividends	6	22	24
Net payments made to the Insolvency Service		(61,926)	(176,909)
Balance at 31 March		**197,541**	**186,297**

The Agency holds a £197.4 million cash and cash equivalents balance with the ISA as disclosed in the Agency's cash disclosures. This total investment by the Agency in the ISA is due to the Agency in full.

5 Payments requested by liquidators and trustees of estates in insolvency and voluntary liquidation

The Act provides for:

i) The repayment to liquidators and trustees of necessary disbursements made and expenses properly incurred during their administration of companies' and bankrupts' estates out of any money standing to the credit of the estate in the ISA.

ii) The payment of dividends to creditors in respect of debts owed to them by companies in liquidation and bankrupts, and distributions to contributories in company liquidations.

It is the responsibility of the trustee or liquidator concerned to ensure that any requisitions for expenses or disbursements relate to amounts which are properly due and payable and that payments of dividends relate to claims of creditors which have been established as being owed by the insolvent estate.

6 Unclaimed Dividends

	Note	2024-25 £'000	2023-24 £'000
Balance at 1 April		119,599	131,284
Dividends recognised as unclaimed in the year		16,022	12,293
Dividends paid out previously categorised as unclaimed		(2,200)	(1,829)
Fees claimed on payments made	4	(22)	(24)
Transfers from estates		18,529	7,281
Transfers to estates		(1,875)	(1,906)
Surrenderable to the Consolidated Fund	7	(31,895)	(27,500)
Balance at 31 March		**118,158**	**119,599**

Dividends which have been paid to creditors but not yet claimed (e.g. unpresented cheques) are collected in the Estate Account and are held. Unclaimed balances remaining unclaimed after 7 years are usually transferred to the Consolidated Fund.

The £27.5 million Consolidated Fund surrender recognition in 2023-24 represented the unclaimed dividends for the years ended 31 March 2015, 2016 and 2017 combined. The £31.9 million surrender to the Consolidated Fund in 2024-25 represents unclaimed dividends for the year ended 31 March 2018, and historic adjustments.

7 Surrenders to the Consolidated Fund

	Note	2024-25 £'000	2023-24 £'000
Balance at 1 April		27,500	0
Dividends not claimed	6	31,895	27,500
Payments made to the Consolidated Fund		(27,500)	0
Balance at 31 March		**31,895**	**27,500**

Unclaimed dividends and amounts which are too small to be divided among the persons entitled to them are collected in the Estate Account for the benefit of the Consolidated Fund.

8 Funds held on behalf of the Treasury Solicitor (BV)

	2024-25	2023-24
	£'000	**£'000**
Balance at 1 April	0	0
Funds received from dissolved companies	3	23
Payments to Treasury Solicitor	0	(23)
Balance at 31 March	**3**	**0**

When a company is dissolved, all property and rights whatsoever vested in or held on trust for the company immediately before its dissolution (including leasehold property, but not including property held by the company on trust for another person), are deemed to be bona vacantia (BV), (S1012, Companies Act 2006). Liquidators are required to pay such funds into the Estate Account. The funds are then paid to HM Treasury Solicitor.

9 Cash at Bank

	2024-25	2023-24
	£'000	**£'000**
Balance at 1 April	19,141	20,280
Excess of Receipts over Payments	0	0
Excess of Payments over Receipts	(4,760)	(1,139)
Balance at 31 March	**14,381**	**19,141**

Cash is held in sterling with the Government Banking Service.

10 Insolvency Estates

		2024-25	2023-24
	Note	**£'000**	**£'000**
Balance at 1 April		931,298	994,621
Fees and VAT charged	4	(73,148)	(57,498)
Net realisations/(payments)		(136,000)	(34,562)
Net Interest paid to funds lodged with the Estate Account		33,971	35,657
Indemnified Disbursements Movement	12	(33,105)	(1,613)
Other payments or adjustments		(16,640)	(5,307)
Balance at 31 March		**706,376**	**931,298**

Insolvency Estates is the total of funds held on behalf of Trustees and Liquidators in respect of insolvency proceedings.

11 Frequent Petitioner

	2024-25	2023-24
	£'000	£'000
Balance at 1 April	(218)	(361)
Funds received from HMRC	4,584	4,730
Deposits applied to petitions from HMRC	(5,228)	(4,587)
Balance at 31 March	**(862)**	**(218)**

Under current legislation a deposit must be paid to the court before a petition can be filed by a creditor. As HMRC are a frequent petitioner, there is a statutory provision which allows HMRC to lodge funds, topped up from time to time, with the ISA from which deposits are then transferred to an insolvency estate when an insolvency order is made on a petition filed by HMRC. The Insolvency Proceedings (Fees) Order 2016 introduced a dismissal/withdrawal administration fee which is also included.

12 Indemnified Disbursements

	2024-25	2023-24
	£'000	£'000
Balance at 1 April	(52,635)	(54,248)
Indemnified Movement	33,105	1,613
Balance at 31 March	**(19,530)**	**(52,635)**

The balance above reflects certain disbursements made by the ISA on behalf of Official Receivers and Insolvency Practitioners to cover disbursements necessary to the administration and safe keeping of specific cases. Where these are funded out of Estate assets, only Estate balances (Note 10) are affected. However, where there are insufficient funds in the individual case account, payments on Official Receiver cases are funded by cash held in the ISA.

Recovery of these amounts is, in practice, expected to arise from future asset recoveries. When assets are realised in the individual case and funds are available to cover the cost of previous payments.

The Insolvency Service can rely on the following sources for the making good of any deficit position on disbursements should the need arise:

i) specific indemnities for National Interest Cases from government departments; and

ii) an expectation of funding to be drawn from the Consolidated Fund under s408 of the Insolvency Act 1986, in respect of Business as Usual cases.

Alec Pybus
Interim Chief Executive
10 September 2025

Annex 1

Accounts Direction given by HM Treasury in accordance with Section 409(2) of the Insolvency Act 1986

1 This direction is given to the Insolvency Service.

2 This direction applies to the financial year ended on 31 March 2020 and to each subsequent financial year.

3 The statement mentioned in section 409(2) of the Insolvency Act 1986 ("the Statement") must comprise:

(a) A Foreword, which will include items of interest to readers such as, but not limited to:

- Statutory Background, including the Insolvency Services Account (ISA) and the Insolvency Service Investment Account (ISIA).
- General Background, including aims and objectives of the ISA and the ISIA.
- Review of Activities, including items such as transactions, banking, interest paid to estates, fees and key performance indicators.
- Forward look.
- Preparation and Audit.

(b) Statement of Chief Executive's responsibilities.

(c) Governance Statement prepared according to best practice, incorporating information such as the governance framework, operation of the ISA and risk management and internal control.

(d) Audit certificate: in line with current regulations, The Certificate and Report of the Auditor and Comptroller General to the Houses of Parliament.

(e) An account of Receipts and Payments, presenting the main categories of both receipts and payments applicable in the year.

(f) A Statement of Balances, showing where major balances are held and what they represent.

4 The Statement must properly present the receipts flowing into and payments flowing out of the ISA and the balances as at the reporting date.

5 This direction shall be reproduced as an appendix to the accounts.

6 This direction supersedes all previous directions issued by HM Treasury under section 409(2) of the Insolvency Act 1986.

Vicky Rock
Interim Director, Public Spending, HM Treasury
22 May 2020

The Insolvency Services Investment Account 2024-25

Performance Report

Overview

The purpose of the overview is to provide sufficient information to understand the Insolvency Services Investment Account (ISIA), its purpose, the key risks to the achievement of its objectives and how it has performed during the year.

These accounts have been prepared by the Commissioners for the Reduction of the National Debt (CRND), under a direction issued by HM Treasury in accordance with section 409(1) of the Insolvency Act 1986.

Purpose and principal activities of the Insolvency Services Investment Account

The ISIA was opened in 1970 as part of the rationalisation of procedures for the funds arising from company bankruptcies and liquidations under the Insolvency Services (Accounting and Investment) Act 1970 (repealed by the Insolvency Act 1986).

By virtue of section 403 of the Insolvency Act 1986 (the Act), when the Secretary of State has excess cash in the Insolvency Services Account (ISA) the excess amount is remitted to CRND for investment in the ISIA; when the balance in the ISA is insufficient to meet demands, CRND make good the shortfall from the ISIA. Under paragraph 16 of Schedule 8 to the Act, income earned by the ISIA is drawn down by the ISA to pay its liabilities of interest to insolvent estates and the associated tax is paid directly to HM Revenue & Customs (HMRC) by ISIA.

Section 404 of the Act empowers CRND to invest all the monies in the ISIA, in accordance with directions given by HM Treasury, in those securities specified in Part II of Schedule 1 to the Trustee Investments Act 1961 (currently restricted to paragraphs 1, 2, 3, 8, 9 and 9A).

Section 408(1) of the Act enables HM Treasury to make payments from the Consolidated Fund to the ISIA to meet any shortfalls in the investment account.

Sections 271 and 272 of the Enterprise Act 2002 amended the Insolvency Service Act 1986 to allow the Secretary of State to set the interest rates payable to liquidators administratively, rather than by secondary legislation, in order to facilitate more frequent changes in the interest rate paid in response to changing rates of return on investments. The legislation also established that HM Treasury may direct payments from the Consolidated Fund to the ISIA, to make good any shortfall due to suitors, and that CRND may pay surplus funds into the Consolidated Fund.

Historically, the investments made by CRND included UK Government gilt-edged securities (gilts) with periods to maturity of up to 10 years. However, under a new regime introduced by the Enterprise Act 2002, voluntary liquidators were, from 1 April 2004, able to invest and divest from the ISA at will and this fundamentally changed the outlook for the account's stability. In those circumstances, continuing to invest in gilts would have given rise to significant market and interest rate risk.

The investment profile of the ISIA is now such that the interest rate earned by the account is more closely related to current short-term interest rate levels. The ISIA's gilt holdings were disposed of in 2004 and the proceeds were placed as short-term deposits with the Debt Management Account. This arrangement remained in place throughout 2024-2025.

The resources used to deliver CRND's objectives are accounted for within the United Kingdom Debt Management Office's (DMO) agency vote and reported in the DMO Annual Report and Accounts 2024-2025. The cost of managing the ISIA is recharged to the Insolvency Service; in 2024-2025, this amounted to £72,000 (2023-2024: £67,000).

Commissioners for the Reduction of the National Debt

CRND's main function is the investment and management of major government funds. The investment powers differ from fund to fund.

The Secretary and Comptroller General and Assistant Comptroller, who are appointed by and act on behalf of the Commissioners, make the day-to-day decisions. There is no legislation that determines the specific responsibilities of the Secretary and Comptroller General and the Assistant Comptroller. However, in practice the role of the Secretary and Comptroller General is considered analogous to acting as the Accounting Officer for CRND. Therefore, the Secretary and Comptroller General takes responsibility for preparing and signing the accounts on behalf of the Commissioners.

The arrangements made between CRND and the Insolvency Service in respect of the investment service provided by CRND are set out in a Memorandum of Understanding, which describes how CRND intend to achieve the agreed investment objectives.

Performance summary

CRND's strategy of investing in the Debt Management Account was maintained throughout 2024-2025. This strategy enabled the ISIA to earn a rate of interest very closely correlated with prevailing short-term sterling interest rates, whilst protecting its capital position and access to liquidity at all times.

Performance analysis

During the year, the ISIA generated total comprehensive income of £26,214k (2023-2024: £24,107k). Interest income of £59,453k (2023-2024: £70,941k) was less than the prior year primarily due to a fall in average interest rates on the ISIA's investments with the Debt Management Account, which correspond to the official Bank Rate, as well as a fall in the average balance available for investment by the ISIA in the Debt Management Account. Interest payable to liquidators of £33,239k (2023-2024: £46,834k) was less than the prior year primarily as a result of a fall in the average interest rate offered to liquidators as well as a fall in the average balance payable to liquidators.

As at 31 March 2025, the total value of investments held by the ISIA was £1,112 million (31 March 2024: £1,268 million). This decrease was due to a net withdrawal of funds by the ISA during the year.

Jo Whelan
Secretary and Comptroller General to the Commissioners
for the Reduction of the National Debt
10 September 2025

Accountability Report

The accountability report comprises two sections: a **corporate governance report** and a **parliamentary accountability and audit report**. The **corporate governance report** includes the following information: the responsibilities of the Secretary and Comptroller General; the composition, responsibilities and actions of the Advisory Board and the Audit and Risk Committee and how they have supported the Secretary and Comptroller General and enabled the objectives of the ISIA; the key risks faced by the ISIA and how it seeks to manage them. The **parliamentary accountability and audit report** includes a formal opinion by the ISIA's external auditor to certify that the financial statements give a true and fair view of the state of the ISIA's affairs for the year and that they have been prepared in accordance with all relevant rules.

These two sections contribute to the ISIA's accountability to Parliament and comply with best practice in relation to corporate governance norms and codes. In particular, the **corporate governance report** seeks to do so by describing the key mechanisms the ISIA employs to ensure it maintains high standards of conduct and performance. This includes the statement of Secretary and Comptroller General's responsibilities which describes her accountability to Parliament for the ISIA's use of resources and compliance with rules set by HM Treasury to ensure best practice in financial management. The governance statement reflects the applicable principles of the Corporate Governance Code for Central Government Departments. The **parliamentary accountability and audit report** confirms that expenditure and income of the ISIA have been applied to the purposes intended by Parliament and confirms that information in the parliamentary accountability disclosures has been audited and approved by external auditors.

Corporate governance report

Directors' report

Operationally, the CRND is part of the DMO and its staff are employees of the DMO. The CRND therefore has no staff of its own. The structure of the CRND is described on page 28.

Directors' conflicts of interest

In 2024-2025, no material conflicts of interest were declared by DMO Advisory Board members.

Reporting of personal data related incidents

The ISIA had no protected personal data related incidents during 2024-2025.

Jo Whelan
Secretary and Comptroller General to the Commissioners
for the Reduction of the National Debt
10 September 2025

Statement of Secretary and Comptroller General's responsibilities

Section 409(1) of the Insolvency Act 1986 requires CRND 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 the ISIA, its income and expenditure, statement of financial position and cash flows for the financial year.

The Commissioners have appointed the Secretary and Comptroller General to discharge their statutory responsibilities, a role that is analogous to acting as an Accounting Officer. Therefore, the Secretary and Comptroller General has responsibility for preparing the annual accounts.

In preparing the accounts, the Secretary and Comptroller General is required to observe the applicable accounting standards and be consistent with the relevant requirements of the Government Financial Reporting Manual (FReM), and in particular to:

- observe the accounts direction issued by HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- make judgements and estimates on a reasonable basis;
- state whether applicable accounting standards 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 are fair, balanced and understandable, and take personal responsibility for the annual report and accounts and the judgements required for determining they are fair, balanced and understandable.

As the role of the Secretary and Comptroller General is analogous to acting as an Accounting Officer, it is considered that the responsibilities of an Accounting Officer, as set out in Managing Public Money published by HM Treasury, apply to the Secretary and Comptroller General. These include responsibility for the propriety and regularity of the public finances for which the Secretary and Comptroller General is answerable, for keeping proper records, and for safeguarding the ISIA's assets.

Disclosure to auditors

Section 409(1) of the Act requires the Commissioners to send accounts prepared by them to the Comptroller and Auditor General.

Under section 409(4) of the Act, the Comptroller and Auditor General examines, certifies and reports on the accounts and lays copies of them with this report before each House of Parliament.

The Comptroller and Auditor general charges no audit fee for undertaking this statutory audit.

As the Secretary and Comptroller General, 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 the ISIA's auditors are aware of that information. So far as I am aware, there is no relevant audit information of which the auditors are unaware.

Governance statement

Scope of responsibility

The Secretary and Comptroller General to the Commissioners for the Reduction of the National Debt (CRND) is responsible for ensuring the operation of a sound system of internal control that supports the achievement of CRND's targets, policies and objectives in managing client investment portfolios whilst safeguarding the public funds for which they are accountable, in accordance with the responsibilities assigned to the Secretary and Comptroller General.

CRND is a separate business entity managed within the control framework of the DMO. While the Secretary and Comptroller General is responsible for CRND's system of internal control, the Accounting Officer of the DMO is responsible for the wider control framework within which CRND is managed. In discharging the control responsibilities, the Secretary and Comptroller General takes assurance on the continued sound maintenance of the wider control framework from the governance statement for the DMO, although it is understood that only reasonable and not absolute assurance can be given that risks have been controlled.

It is also the responsibility of the Secretary and Comptroller General to ensure that all CRND fund management activities are conducted with due regard to value for money and operated in line with client instructions. The Secretary and Comptroller General has put arrangements in place to ensure that there is a proper evaluation of the balance of cost and risk in our operations.

CRND is committed to the highest standards of corporate governance and is subject to the guidance set out in the Corporate Governance Code for central government departments (the Code) and the principles laid down in that Code:

- Parliamentary accountability;
- The role of the Board;
- Board composition;
- Board effectiveness; and
- Risk management.

CRND does not conduct any part of its business with or through arm's length bodies (ALBs) and therefore CRND has not applied principle six which covers departmental governance arrangements with ALBs.

On 28 September 2023, it was announced the Accounting Officer for the DMO would be retiring at the end of June 2024 and an open recruitment process for a successor commenced in late December 2023. On 16 April 2024, Jessica Pulay was announced as the new Chief Executive and commenced this role on 1 July 2024.

Advisory Board

The Secretary and Comptroller General was supported during 2024-2025 by the Advisory Board (the Board) which, in addition to the Secretary and Comptroller General, is comprised of:

- Dame Sue Owen

  Non-executive Chair – Dame Sue was a civil servant for 30 years, including 14 years at HM Treasury. Amongst other things, she worked on fiscal policy and debt management policy at HM Treasury. Dame Sue has previously held senior roles at the Foreign & Commonwealth Office, Department for International Development and Department for Work & Pensions. Most recently she served as the Permanent Secretary at the Department for Digital, Culture Media & Sport, from 2013 to 2019. Dame Sue has other current roles, including non-executive director at Pantheon International plc and Serco plc.

- Jessica Pulay

  DMO Chief Executive and Accounting Officer (from 1 July 2024)

  Co-Head of Policy and Markets (until 30 June 2024)

- Sir Robert Stheeman (until 30 June 2024)

  DMO Chief Executive and Accounting Officer

- Jim Juffs

  Chief Operating Officer

- Ruth Curtice (until 17 December 2024)

  Non-executive HM Treasury representative

- Paul Fisher

  Non-executive Director – During a 26-year career at the Bank of England, Paul Fisher served as a member of the Monetary Policy Committee from 2009 to 2014, the interim Financial Policy Committee from 2011 to 2013 and the PRA Board from 2015 to 2016. Paul has a number of current roles including Chair of the London Bullion Market Association.

- Martin Egan

  Non-executive Director – Martin Egan has 37 years of experience in financial markets. Most of his career was spent at BNP Paribas in various roles including Managing Director Global Co-Head Primary and Secondary Credit, Vice Chairman of the Global Markets Client Board, and Chair of BNPP UK Ltd. He was also Chair of the Diversity and Inclusion Network at BNPP UK. Earlier in his career he held roles at JP Morgan Ltd., UBS Investment Bank and Credit Suisse First Boston. Martin was also the Chair of the Board of the International Capital Market Association from May 2017 to May 2018, and a member of the Board for another five years before that.

Non-executive directors are appointed by the Non-executive Chair, in consultation with the DMO Accounting Officer, following a formal process and have fixed terms defined in their contract of service. All Non-executive board members including the Non-executive Chair will receive an induction on joining and have access to additional information and training where it is considered necessary for the effective discharge of their duties. A non-executive HM Treasury representative was appointed upon an open recruitment campaign for a successor.

One of the roles of the Board is to advise the Secretary and Comptroller General on any key decisions affecting CRND.

An executive sub-committee of the Board generally meets weekly and supports the Secretary and Comptroller General on operational decisions.

The Terms of Reference for the Advisory Board were set out on its formation in June 2022. The Board's effectiveness was reviewed in November 2024, after the new Accounting Officer was established in the role. Overall, the review found that the Advisory Board had been very effective in fulfilling its responsibilities.

2024-2025 Advisory Board activities

Board meetings were held throughout 2024-2025 and covered regular agenda items, including risk management, staffing and progress against the operational business plan.

Board, as well as Audit and Risk Committee, attendance is outlined in the table below:

			Audit and Risk Committee*	
	Possible	**Actual**	**Possible**	**Actual**
Dame Sue Owen	6	6		
Jessica Pulay	6	6		
Sir Robert Stheeman	2	2		
Jo Whelan	6	6		
Jim Juffs	6	6		
Paul Canty	1	1		
Ruth Curtice	5	5		
Paul Fisher	6	6	5	5
Martin Egan	6	6	5	5
Rodney Norman	n/a	n/a	5	5

* There was one additional ad-hoc meeting to discuss preparations to sign the Annual Report and Accounts 2023-2024 ahead of the departure of the DMO's former Chief Executive, Sir Robert Stheeman.

Audit and Risk Committee

The Secretary and Comptroller General was supported during 2024-2025 by the Audit and Risk Committee on matters relating to risk, internal control and governance. The Audit and Risk Committee covers the activities of the DMO, Debt Management Account, PWLB lending facility and CRND. The members of the Audit and Risk Committee during 2024-2025 were:

- Paul Fisher (Chair)
- Martin Egan
- Rodney Norman

  Audit and Risk Committee member – Rodney was Finance Director of NS&I until 2018. Prior to that Rodney was the Treasury Accountant at HM Treasury. This was preceded by a career in the City where he qualified as a Chartered Accountant with PWC and was Finance Director of the Banking Division of Close Brothers. Rodney is currently a non-executive member of the Audit and Risk Committee of the Army. Rodney has previously been a senior advisor to the Bank of England and a non-executive director of a variety of organisations including the Pension Protection Fund, where he was also a member of its Risk and Audit Committee and chaired the Nominations Committee.

Audit and Risk Committee meetings are typically attended by the DMO Accounting Officer, the Secretary and Comptroller General, the Co-Heads of Policy & Markets, the Chief Operating Officer, Head of Internal Audit, the Head of Finance, the Head of Risk and the National Audit Office.

One of the Audit and Risk Committee's objectives is to give advice to the Secretary and Comptroller General on:

- The overall processes for risk, control and governance and the governance statement;
- Management assurances and appropriate actions to follow from internal and external audit findings, risk analysis and reporting undertaken;
- The financial control framework and supporting compliance culture;
- Accounting policies and material judgements, the accounts and the annual report and management's letter of representation to the external auditors;
- Whistleblowing arrangements for confidentially raising and investigating concerns over possible improprieties in the conduct of the DMO's business;
- Processes to protect against money laundering, fraud and corruption; and
- The planned activity and results of both internal and external audits.

During the period under review the Audit and Risk Committee paid particular attention to the following areas:

- Results of cyber security reviews and tests;
- Succession planning and key dependency risks;
- Documentation of roles and responsibilities and authorisations and delegations;
- Personnel and building security risks;
- Risk management framework;
- Personal dealing policy;

- High level risks, principal risks and uncertainties;
- Procurement processes and controls;
- Finance processes;
- Business critical models;
- User access rights and permissions;
- Critical spreadsheets;
- Compliance with applicable legal & regulatory requirements;
- Governance and controls over cash management;
- Operating models for debt and cash management activities;
- Civil Service Commissioners recruitment principles;
- IT controls over patching updates;
- SWIFT attestation;
- Business Continuity response plans in event of a cyber security incident;
- Whistleblowing policy;
- Trading System upgrade project;
- Changes to Global Internal Audit Standards.

The Audit and Risk Committee covers a regular programme of agenda items, together with other current topics, and met four times during the year. There was one additional ad-hoc meeting to discuss preparations to sign the Annual Report and Accounts 2023-2024 ahead of the departure of the DMO's former Chief Executive, Sir Robert Stheeman.

The Secretary and Comptroller General has also been informed by the following operational committees throughout the period under review.

Fund Management Review Committee

The Fund Management Review Committee monitors CRND activity relating to the performance of the government funds under management, including any reporting on compliance activities undertaken in relation to the funds.

The Fund Management Review Committee met four times in 2024-2025.

Business Delivery Committee

The Business Delivery Committee (BDC) reviews the status of the delivery of DMO's business and work plan as a collective cross-functional body, resolving emerging issues in a timely way, and agreeing priorities to ensure the plan stays on track. The most significant initiatives monitored by the Business Delivery Committee during the year were the trading system upgrade, infrastructure upgrades, and the IT strategy.

The Business Delivery Committee met regularly (typically weekly) throughout 2024-2025.

Risk Committees

The Secretary and Comptroller General is informed by two risk committees covering operational risk and material change programmes. More detail on the roles, responsibilities and activities of these committees can be found in the sections below.

Risk management and internal control

The Secretary and Comptroller General is responsible for maintaining a sound system of internal control that supports the achievement of CRND’s targets, policies and objectives in managing client investment portfolios whilst safeguarding the public funds for which they are accountable, in accordance with the responsibilities assigned to them in the Managing Public Money document.

CRND is managed within the wider DMO system of internal control which is based upon what the DMO Accounting Officer, with the support of the Board, considers to be appropriate, taking account of the DMO’s activities, the materiality of risks inherent in those activities and the relative costs and benefits of implementing specific controls to mitigate those risks. The DMO’s position differs to that of a commercial organisation in that it must always be in a position to transact the underlying business required to meet its remit. As a result, the risks associated with this activity cannot be avoided and the system of internal control can only provide reasonable assurance against failure to achieve aims and objectives.

The Risk and Control Framework

The Board has designed and put in place a formal risk management framework covering all the activities conducted and overseen by the DMO. This framework helps ensure that the DMO Accounting Officer is appropriately informed and advised of any identified risks and also allows the management of risks to be monitored. The risk management framework covers both regular operations and new business initiatives, and evolves as the range and nature of the DMO’s activities change. The framework is supported by a clear ‘three lines of defence’ model:

First line of defence:

Day-to-day management of risk is the responsibility of management staff within business areas. The DMO considers effective risk management to be central to its operations and fosters a risk aware culture in which all members of staff, including Board members, are encouraged to understand and own the risks that are inherent in those operations. In particular, the DMO seeks to promote an environment in which staff feel comfortable to identify new risks and changes in previously identified risks, as well as weaknesses so that these may be assessed and appropriate mitigating actions put in place.

Mitigating actions typically include segregation of duties, staff training, clear lines of management delegation and reporting and robust business continuity arrangements.

Second line of defence:

Oversight of risk is provided by the Board and risk committees, whose role is to provide regular and systematic scrutiny of risk issues which lie within their remit and to support the DMO Accounting Officer in exercising their overall responsibility for risk management.

The DMO considers that the principal risks it faces arise in three broad areas: credit risk, market risk and operational risk. It has established committees to meet regularly to review the changing risk pattern for each of these areas and to set up appropriate responses. The work of these committees is described in more detail below.

Credit and Market Risk Committee

The Credit and Market Risk Committee (CMRC) meets on a regular basis, with more frequent meetings held when required, for example during times of market stress. The CMRC monitors and reviews the management of market, credit, and liquidity risk. The CMRC met seven times during 2024-2025.

Operational Risk Committee

The Operational Risk Committee (ORC) meets regularly to monitor operational risks and to review significant risk issues. The ORC is responsible for reviewing risk incidents identified through the DMO's risk incident reporting process, and for considering whether planned mitigating actions are appropriate. The ORC also reviews and tracks the progress of actions identified by Internal Audit. The ORC's scope includes issues relating to information risk, IT security, business continuity, anti-fraud and key supplier risks.

The ORC has advised the DMO Accounting Officer and the Board, during the year, on significant operational risk concerns, significant risk issues and trends as well as actions to mitigate such risks. The ORC has focused this year on business continuity, information security, cyber security, physical security and personnel security. The ORC also reviewed contingency planning scenarios. The ORC met eight times during 2024-2025.

Controls Group

The Controls Group meets periodically to review issues affecting the DMO's system of internal control and to analyse material changes to the control environment. The Controls Group recommends actions to management to implement changes where appropriate. The Controls Group consists of representatives from Finance, Risk, Compliance and Internal Audit.

The Controls Group has advised the DMO Accounting Officer, the Board and senior management on any significant risk concerns stemming from the introduction of new business activities as well as risks relating to other change management activities. The Controls Group has also advised the DMO Accounting Officer on suitable mitigating actions where appropriate.

During the year the Controls Group reviewed key project change proposals including the escalation process of incidents, trading process enhancements, IT strategy and the trading system upgrade implementation.

Risk Management Unit

The risk committees are supported by the DMO’s Risk Management Unit (RMU) which ensures key risk issues arising from these committees are communicated to the DMO Accounting Officer and senior management on a regular basis, with additional ad-hoc reporting if an emerging issue requires it. The RMU also supports the formal risk reporting processes with defined outputs, including regular detailed risk reports which are reviewed by the Board and senior management.

As well as supporting the risk committee structure, the RMU provides control advice on risks. As part of the second line of defence the RMU is separate from, and independent of, the DMO’s trading operations. The RMU conducts risk analysis and provides market, credit and operational risk capability for the DMO.

The identification, monitoring and mitigation of operational risk is facilitated by the RMU via quarterly consultations with heads of business units and functional teams. Significant risk issues are assessed for materiality and probability of occurrence. New risks, and risks to which exposure is increasing, are highlighted and actions are taken to ensure effective management of all risks. The DMO has Senior Risk Owners (SROs) who undertake a cross-functional moderation process to promote better prioritisation of operational risks across the organisation. The RMU maintains a central exception log to record all risk incidents raised, in order to identify control weaknesses and assign actions to improve controls. RMU continued to carry out compliance awareness training to all staff, throughout the year.

Third line of defence:

The DMO’s Internal Audit function is the third line of defence and provides the Accounting Officer with independent and objective assurance on the overall effectiveness of the DMO’s system of internal control. It does this through a risk based work programme which is presented to and approved by the Audit and Risk Committee at the start of each year. All audits review the processes in place and where necessary raise findings relating to control weaknesses and management actions are agreed to mitigate any risks and enhance the control structure. Progress against agreed management actions is monitored on a regular basis to ensure issues highlighted by internal audit, as well as any issues raised by the external auditors, and other identified actions to improve the control environment, are managed and progressed within agreed deadlines. The function is independent of the DMO’s trading activities and operations and has a direct reporting line to the Accounting Officer as well as the chair of the Audit and Risk Committee. The work of Internal Audit includes assessing the effectiveness of both control design and control performance. With its independence and overall remit, Internal Audit provides a third line of defence against the risks that might prevent the DMO delivering its objectives.

Risk policies and procedures

The DMO's risk policies reflect the high standards and robust requirements which determine the way risks are managed and controlled. The DMO Accounting Officer, with the support of the Board, ensures that policies are regularly reviewed to reflect any changes in the DMO's operations and/or best practice. In 2024-2025, this included policies relating to health & safety, spreadsheet control, anti-fraud, personal dealing, gifts & hospitality and anti-money laundering.

Staff are asked to confirm that they have read and accepted the DMO's rules on personal dealing and the DMO's policy on the use of information systems and technology, and that they are aware of, and will continue to keep up to date with, the DMO's policies on whistleblowing, anti-fraud, anti-money laundering and information security. The DMO ensures that this exercise is undertaken on an annual basis allowing staff to maintain a good level of awareness of the DMO's policies in these areas. All members of staff have job descriptions which include reference to the specific key risks they are expected to manage.

Managers in each business function are responsible for ensuring that the operations within their area are compliant with plans, policies, procedures and legislation.

During 2024-2025 no concerns were raised by staff under the DMO's whistleblowing policy relating to CRND.

Key Developments

Geopolitical conflicts

Further to ongoing geopolitical conflicts, the DMO again continued to closely monitor actual and potential effects on activities, markets, counterparties and suppliers.

The DMO continued to work with partners across government to ensure all necessary steps were taken to maintain cyber security defences and also assurances were received from some strategic partners regarding their own arrangements, with details of the assurances put in place to mitigate against any disruption or impact. Internal assessments considered potential accounting or disclosure impacts and any effects through legal and regularity changes.

Spending Review

Risks to effective delivery of the DMO's objectives arise from the constraints associated with pressures on public sector spending. As a result, effective budgetary control continues to be a critical element of financial management of the DMO.

The DMO continues to face particular challenges due to the nature of its role. First, it faces specific additional cost increases for certain third-party services it requires in order to undertake its role in the financial markets. Second, it competes for recruitment of suitably skilled staff with private sector banks and other financial institutions which are not subject to the same remuneration constraints as the DMO. Notwithstanding these exogenous cost pressures, the DMO's core objectives are non-discretionary, so it would be challenging to deprioritise certain objectives in order to reduce costs.

Risk Profile

The Secretary and Comptroller General and the DMO Board believe that the principal risks and uncertainties facing CRND are outlined in the table below, together with the key actions taken to manage and mitigate them:

Principal risks and uncertainties	Mitigation and management
IT systems and infrastructure	
CRND relies on a number of IT and communications systems to conduct its operations effectively and efficiently.	During the year, the DMO has progressed additional initiatives to further strengthen the resilience and security of its IT network and infrastructure. Strategic roadmap priorities were reviewed and the DMO carried out an internal health-check. The DMO has in place structured business continuity arrangements to ensure it is able to continue market operations in the event of an internal or external incident that threatens business operations. Arrangements to support critical operations were in place throughout the year with a core team in the office, support teams working from the disaster recovery site and staff working from home. Assessment of business continuity needs is also a specific requirement for new projects and major business initiatives.
IT and data security	
The DMO could be the subject of an external attack on its IT systems and infrastructure. Through its activities the DMO gathers, disseminates and maintains sensitive information including market sensitive information and personal data about staff and market participants. The DMO seeks to ensure the highest standards of data protection and information management.	The DMO, including CRND, continues to work to maintain the required level of protective security covering physical, personnel and information security and is particularly aware of the growing threat posed by cyber security risk. IT and data security risks continued to be a specific area of focus in 2024-2025 and the DMO's IT team have been enhancing the detective, protective and recovery security controls. Risks to data and information held by the DMO are owned and managed by designated Information Asset Owners. The DMO has a Senior Information Risk Owner (SIRO) who is responsible for the information risk policy and the assessment of information risks. The SIRO is a member of the Board and provides advice to Board members on the management of information risks.

Principal risks and uncertainties	Mitigation and management
	The DMO has upgraded its monitoring and alerting systems throughout the infrastructure, providing improved visibility and enhancing the response to potential incidents. This year the DMO undertook internal and independent testing to ensure defences remained robust against the changing landscape of cyber-attacks. This year, the DMO observed a global IT outage that disrupted the financial markets, reinforcing the importance of contingency planning and mitigating third party supplier risk.
Reliance on third parties	
A number of the operational systems and services on which CRND relies are provided or supported by third party suppliers.	To mitigate the risk of failure of a key third party supplier the DMO undertakes regular corporate risk assessments of each key supplier to assess a range of factors including its financial strength and operational capacity, including the reliance on sub-contractors. The DMO has dedicated contract owners who meet regularly with key suppliers and monitor performance against the agreed Service Level Agreements, where appropriate. The procurement manager and the vendor management group have been working to embed consistent standards of supplier management across account managers by improving visibility of key contracts and sharing best practice. The DMO has introduced enhanced monitoring for critical suppliers (i.e. strategic partners) that focuses on risk and strategic aspects. Scrutinised areas include inherent risks, scenario analysis, assessment of supply chain risks including fourth parties, monitoring and assessing residual risks, and mitigation planning. External consultancy work assisted with the approach. The DMO sought assurance that its key suppliers and strategic partners follow National Cyber Security Centre (NCSC) guidance on cyber security. This year, further work was undertaken to explore alternative arrangements where over-reliance on particular key suppliers has been identified.

Principal risks and uncertainties	Mitigation and management
	Work has commenced to align the DMO procurement policies and procedures with the new procurement legislation and to ensure it remains up to date with the Government Functional Standard GovS 008: Commercial and Commercial Continuous Improvement Assessment Framework. The Procurement Bill received Royal Assent on 26 October 2023. It will now be referred to as the Procurement Act 2023 and came into force on 24 February 2025.
Transaction processing	
CRND relies on its operational processes to successfully execute a significant number of high value transactions on a daily basis. Reliance on the accurate execution of processes exposes CRND to operational risk arising from process breakdowns and human error.	A key component of CRND's control framework is the segregation of duties to ensure independent checking and reconciliation, and to avoid concentration of key activities or related controls in individuals or small groups of staff. In particular, segregation of duties takes place between front and back office activities. All teams, including CRND, have documented procedures for their main activities and there are clearly defined authorisation levels for committing the DMO externally. The RMU conduct regular control and compliance testing of CRND activities, providing the executive sub-committee of the Board with assurance on the effectiveness of operational controls and compliance with relevant Financial Conduct Authority and Prudential Regulation Authority rules in the dealing and settlement areas. The DMO also maintains a strong audit and control environment which includes a well embedded incident reporting procedure which extends to cover CRND. This promotes the early identification and resolution of risk incidents and provides visibility to the DMO Accounting Officer and Board. The continued focus has been on enhanced compliance monitoring over transaction processing, to provide assurance over controls standards during remote working. During the year, operational support training was provided to relevant staff to increase resilience in support roles. There were also enhanced controls implemented for oversight of counterparty interactions. This year, the DMO worked on upgrading a key trading system.

Principal risks and uncertainties	Mitigation and management
People risk	
The DMO, including CRND, relies on maintaining a sufficiently skilled workforce at all levels of the organisation in order to operate effectively and efficiently, ensuring delivery of its strategic objectives. The DMO is exposed to an increased risk of operational failure if it is unable to compete for, and retain, sufficiently skilled staff over time. Competition for skilled staff is generally against employers from the private financial services sector who have historically offered higher remuneration packages that are not subject to public sector remuneration policies.	DMO recruitment activity helps ensure that individuals with the appropriate level of skill and experience are appointed at all levels within the organisation. This helps mitigate the level of human error which could result in process failures. The DMO follows the Civil Service Commission's recruitment principles and selection process to ensure vacancies are filled on merit on the basis of fair and open competition. Challenges with recruitment and retention were again identified this year and were reviewed by the Advisory Board. These include pay, length of time to hire and staff turnover, particularly in more junior roles. The DMO is taking action to target these areas and seeing signs of greater stability in the workforce. The DMO has a formal performance appraisal process and all staff are given clear and achievable objectives. Progress is reviewed against these regularly. The DMO's Training and Development policy is designed to help ensure that staff have the right skills to meet its objectives. Induction training is provided to all new employees. Staff are encouraged to engage in activities which promote development and the DMO provides regular training opportunities and support for professional studies to enhance the skills base of its employees. The DMO also provides cross-training for different roles to help improve staffing flexibility and reduce turnover pressure. Teams are encouraged to ensure cross-skilling of staff to support resilience. Succession planning activities continued to identify key person risks and mitigations, with a focus on establishing deputies to provide resilience.

Principal risks and uncertainties	Mitigation and management
	Salaries are benchmarked annually to equivalent private sector pay levels in order to keep management aware of any significant disparities that are developing. The DMO has a policy to recognise those staff who have performed well in their roles through the payment of one-off non-consolidated performance related awards. Any awards are assessed annually by the DMO Performance Review Team. They are determined by individual performance and criteria associated with the DMO's performance management process, which are also aligned to the policy for public sector pay. Risks to our people are considered by an internal security group and include safety and physical, cyber and personnel security. This includes activity within the physical building and external factors. Risks from our people are also considered. As well as risks resulting from under-skilled or under resourced teams, the DMO considers insider risk, both intentional and accidental. Addressing the threat of insider risk requires a multi-disciplinary approach encompassing cyber security, human resources, line management and robust risk controls. In addition, the DMO has continued to benchmark Personnel Security to identify the level of competence and areas for development. The DMO will continue to increase its security culture, building on screening and monitoring of the workforce, insider risk assessment and management, investigation and disciplinary processes. A Staff Council has met regularly throughout the year and enabled an open exchange of ideas and views between management and staff representatives. Staff Council was consulted to discuss the future hybrid working arrangements. This has been an effective conduit for wider communication and consultation with all staff.

Principal risks and uncertainties	Mitigation and management
	On an annual basis all DMO staff are given the opportunity to take part in the Civil Service People survey. Any issues raised via this route, with suggested mitigating action if required, are considered by the Accounting Officer and the Board. The organisation has placed greater emphasis on undertaking key person risk analysis for succession planning. This year, HR organised management development training across the organisation to support the management group. The DMO is a disability confident employer.

Review of effectiveness

I have reviewed the effectiveness of the system of internal control and confirm that an ongoing process designed to identify, evaluate and prioritise risks to the achievement of CRND's aims and objectives has been in place throughout 2024-2025. This review included an assessment of any material risk and control issues identified and reported during the relevant period.

My review has been informed by the advice of the risk committees, the work of the internal auditors and the executive managers within the DMO, who have been delegated responsibility for the development and maintenance of the internal control framework. Comments made by the external auditors in their management letter and other relevant reports have also informed this review.

In my role as Secretary and Comptroller General I have been advised on the implications of the result of my review, of the effectiveness of the system of internal control by the Board and the Audit and Risk Committee.

In 2024-2025, no ministerial directions were given and no material conflicts of interest have been noted by the Board or Audit Committee members in the Register of Interests.

In my opinion, CRND's system of internal control was effective throughout the financial year and remains so on the date I sign this statement.

Jo Whelan
Secretary and Comptroller General to the Commissioners
for the Reduction of the National Debt
10 September 2025

Parliamentary accountability and audit report

Regularity of expenditure

The income and expenditure of the ISIA were applied to the purposes intended by Parliament.

The above statement has been audited.

Fees and charges

The ISIA received no fees or charges during the year.

The above statement has been audited.

Remote contingent liabilities

The ISIA did not have any remote contingent liabilities as at 31 March 2025.

The above statement has been audited

Jo Whelan
Secretary and Comptroller General to the Commissioners
for the Reduction of the National Debt
10 September 2025

The Certificate and Report of the Comptroller and Auditor General to the Houses of Parliament

Opinion on financial statements

I certify that I have audited the financial statements of the Insolvency Services Investment Account for the year ended 31 March 2024 under the Insolvency Act 1986.

The financial statements comprise the Insolvency Services Investment Account's:

- Statement of Financial Position as at 31 March 2024;
- Statement of Comprehensive Income, Statement of Cash Flows and Statement of Changes in Client Funds 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 Insolvency Services Investment Account's affairs as at 31 March 2024 and its total comprehensive income for the year then ended; and
- have been properly prepared in accordance with the Insolvency Act 1986 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 2019*. I am independent of the Insolvency Services Investment Account 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 Insolvency Services Investment Account'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 Insolvency Services Investment Account'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 Commissioners and the Secretary and Comptroller General with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Insolvency Services Investment Account 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 Commissioners and Secretary and Comptroller General 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, 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 made under the Insolvency Act 1986; and
- 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 Insolvency Services Investment Account 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 Insolvency Services Investment Account 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
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Commissioners and the Secretary and Comptroller General for the financial statements

As explained more fully in the Statement of Secretary and Comptroller General's Responsibilities, the Commissioners and the Secretary and Comptroller General are 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 Insolvency Services Investment Account 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 prepared in accordance with HM Treasury directions issued under the Insolvency Act 1986; and
- assessing the Insolvency Services Investment Account'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 Commissioners and the Secretary and Comptroller General anticipate that the services provided by the Insolvency Services Investment Account 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 Insolvency Act 1986.

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 Insolvency Services Investment Account's accounting policies.
- inquired of management, the Insolvency Services Investment Account's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Insolvency Services Investment Account'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 Insolvency Services Investment Account's controls relating to the Insolvency Services Investment Account's compliance with the Insolvency Act 1986 and Managing Public Money;

- inquired of management, Insolvency Services Investment Account'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 Insolvency Services Investment Account for fraud and identified the greatest potential for fraud in the following areas: revenue recognition and posting of unusual journals. 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 Insolvency Services Investment Account's framework of authority and other legal and regulatory frameworks in which the Insolvency Services Investment Account 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 Insolvency Services Investment Account. The key laws and regulations I considered in this context included the Insolvency Act 1986 and Managing Public Money.

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 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; and
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

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

11 September 2025

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

Accounts of the Insolvency Services Investment Account

Statement of comprehensive income

For the year ended 31 March 2025

	2025	2024
	£'000	**£'000**
Interest income	59,453	70,941
Gross interest payable to liquidators	(33,239)	(46,834)
Total comprehensive income	**26,214**	**24,107**

The notes on pages 60 to 62 form part of these accounts.

Statement of financial position

As at 31 March 2025

	2025	2024
	£'000	**£'000**
Assets		
Demand deposits with the Debt Management Account	1,112,310	1,267,660
Total assets	**1,112,310**	**1,267,660**
Liabilities and client funds		
Liabilities		
Net interest payable to liquidators	10,210	17,590
Tax on interest payable to HMRC	2,553	4,397
	12,763	**21,987**
Client funds		
ISA funds	1,019,200	1,192,700
Accumulated net profits on disposal of gilts	12,924	12,924
Surplus less interest payable to liquidators	67,423	40,049
	1,099,547	**1,245,673**
Total liabilities and client funds	**1,112,310**	**1,267,660**

The notes on pages 60 to 62 form part of these accounts.

Jo Whelan
Secretary and Comptroller General to the Commissioners
for the Reduction of the National Debt
10 September 2025

Statement of cash flows

For the year ended 31 March 2025

	2025 £'000	2024 £'000
Operating activities		
Interest received on deposits with the Debt Management Account	61,053	69,896
Interest paid to the ISA	(33,971)	(35,657)
Tax on interest paid to HMRC	(8,493)	(8,914)
Decrease in demand deposits with the Debt Management Account	153,751	137,509
Net cash from operating activities	**172,340**	**162,834**
Financing activities		
Funds received from the ISA	296,660	281,166
Funds paid to the ISA	(469,000)	(444,000)
Net cash used in financing activities	**(172,340)**	**(162,834)**
Increase in cash	**–**	**–**
Cash at the beginning of the year	**–**	**–**
Cash at the end of the year	**–**	**–**

The notes on pages 60 to 62 form part of these accounts.

Statement of changes in client funds

For the year ended 31 March 2025

	ISA funds	Accumulated net profits on disposal of gilts	Surplus less interest payable to liquidators	Total ISA funds
	£'000	£'000	£'000	£'000
At 31 March 2023	**1,356,700**	**12,924**	**14,776**	**1,384,400**
Total comprehensive income	–	–	24,107	24,107
Transferred from client money employed account	(1,166)	–	1,166	–
Funds received from the ISA	281,166	–	–	281,166
Funds paid to the ISA	(444,000)	–	–	(444,000)
At 31 March 2024	**1,192,700**	**12,924**	**40,049**	**1,245,673**
Total comprehensive income	–	–	26,214	26,214
Transferred from client money employed account	(1,160)	–	1,160	–
Funds received from the ISA	296,660	–	–	296,660
Funds paid to the ISA	(469,000)	–	–	(469,000)
At 31 March 2025	**1,019,200**	**12,924**	**67,423**	**1,099,547**

The notes on pages 60 to 62 form part of these accounts.

Notes to the accounts

For the year ended 31 March 2025

1 Accounting policies

(i) Basis of preparation

These accounts have been prepared in accordance with a direction made by HM Treasury under section 409(1) of the Insolvency Act 1986, in accordance with applicable International Financial Reporting Standards (IFRS) and relevant requirements of the Government Financial Reporting Manual; and under the historical cost convention and on a going concern basis. In particular, the following standards have been applied:

- IFRS 7 Financial Instruments: Disclosures
- IFRS 9 Financial Instruments
- IFRS 13 Fair Value Measurement
- IAS 1 Presentation of Financial Statements (revised 2007)
- IAS 7 Statement of Cash Flows
- IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors
- IAS 10 Events After the Reporting Period
- IAS 24 Related Party Disclosures
- IAS 32 Financial Instruments: Presentation
- IAS 36 Impairment of Assets
- IAS 37 Provisions, Contingent Liabilities and Contingent Assets

Certain IFRS have been issued or revised, but are not yet effective. Those issues or revisions expected to be relevant in subsequent reporting periods are:

- IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures
  - These have been amended by *Amendments to the Classification and Measurement of Financial Instruments (Amendments to IFRS 9 and IFRS 7)* to address matters identified during the post-implementation review of the classification and measurement requirements of *IFRS 9 Financial Instruments*. Application is required for reporting periods beginning on or after 1 January 2026. The ISIA expects to apply these revisions to IFRS 9 and IFRS 7 in 2026-2027. The application of these revisions, which affect specific issues relating to derecognition of certain financial liabilities, classification of certain financial assets and specific disclosures, are not expected to materially alter the presentation of the financial statements of the ISIA

  - These have been amended by *Annual Improvements to IFRS Accounting Standards – Volume 11*. Application is required for reporting periods beginning on or after 1 January 2026. The ISIA expects to apply these revisions to IFRS 9 and IFRS 7 in 2026-2027. The application of these revisions, which address a small number of very specific issues relating to IFRS 9 and IFRS 7, are not expected to materially alter the presentation of the financial statements of the ISIA.

- IFRS 18 Presentation and Disclosure in Financial Statements, which is a new standard issued by the International Accounting Standards Board. Application is required for reporting periods beginning on or after 1 January 2027. The ISIA expects to apply IFRS 18 in 2027-2028. The application of IFRS 18, which replaces IAS 1 'Presentation of Financial Statements', aims at improving how entities communicate in their financial statements. This will likely alter the presentation of the financial statements of the ISIA.

A separate income statement, as required by the accounts direction, has not been presented as the content would be identical to the statement of comprehensive income. A statement of comprehensive income is required by IAS 1.

(ii) Assets

Deposits with the Debt Management Account are financial assets held by the ISIA in order to collect contractual cash flows of principal and interest on specified dates. Therefore, these deposits are treated as financial assets measured at amortised cost.

(iii) Income recognition

Interest income is recognised using the effective interest rate method. The effective interest rate is the rate that exactly discounts estimated future cash receipts or payments through the expected life of the financial instrument or, where appropriate, a shorter period, to the net carrying amount of the instrument.

(iv) Interest payable to liquidators

The interest payable to liquidators is an estimated value provided half yearly by the Insolvency Service.

(v) Administrative costs

Administrative costs are accounted for in the DMO Annual Report and Accounts 2024-2025 and a recovery is made from the Insolvency Service.

2 Risk

(i) Credit risk

Credit risk is the risk that a counterparty, or security issuer, will fail to discharge a contractual obligation resulting in financial loss to the ISIA.

The investments of the ISIA comprised deposits with the Debt Management Account. These deposits were considered to have no exposure to credit risk because they are obligations of HM Government.

There were no renegotiated assets or assets considered impaired at 31 March 2025 (31 March 2024: no renegotiated or impaired assets).

(ii) Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk for the ISIA was considered to comprise interest rate risk.

The interest returns on deposits were closely linked to the official Bank Rate.

CRND monitored interest rate movements to help inform the Insolvency Service of potential issues and events. The ISIA was not subject to active management and thus no formal market risk parameters were in place.

(iii) Liquidity risk

Liquidity risk is the risk that the ISIA will encounter difficulty in meeting obligations associated with client withdrawal requests.

Assets held by the ISIA were highly liquid to enable all client obligations to be met as they fell due.

3 Related party transactions

CRND is a separate entity within the DMO. CRND client mandates are kept distinct from other DMO business.

During the year, the ISIA had a significant number of material transactions with the Debt Management Account, which is operated by the DMO. CRND's client mandates required the bulk of the funds to be invested in gilts or deposited with the Debt Management Account. The amount held by the Debt Management Account is shown in the statement of financial position, and the interest received and movement in amounts deposited are shown in the statement of cash flows.

During the year, the ISIA had a significant number of material transactions with the ISA due to monies advanced and withdrawn in respect of investments. During the year, the ISA withdrew £172,340k (net of advances) from the ISIA (2023-2024: £162,834k net withdrawal).

4 Events after the reporting date

In accordance with the requirements of IAS 10, events after the reporting period are considered up to the date on which the Secretary and Comptroller General authorises the accounts for issue. This is interpreted as the date of the Certificate and Report of the Comptroller and Auditor General (page 55).

Accounts Direction

Accounts Direction given by the Treasury in accordance with Section 409 (1) of Insolvency Services (Accounting & Investment) Act 1976 (Amended 1986)

1 This direction applies to the Insolvency Services Investment Account.

2 The Commissioners for the Reduction of the National Debt shall prepare accounts for the financial year ended 31 March 2012 and subsequent financial years which give a true and fair view of the state of affairs of the Account at the reporting date, and of its income and cash flows for the year then ended.

3 The accounts shall be prepared in accordance with applicable accounting standards, and shall be consistent with relevant requirements of the extant Government Financial Reporting Manual.

4 The accounts shall present an income statement, a statement of comprehensive income, a statement of financial position, a statement of cash flows, and a statement of changes in client funds. The statement of financial position shall present assets and liabilities in order of liquidity.

5 The notes to the accounts shall include disclosure of assets and liabilities, and of income and expenditure, relating to other central government funds including the National Loans Fund.

6 The report shall include:

a) a brief history of the Account, and its statutory background;

b) an outline of the scope of the Account, its relationship to HM Treasury and other central funds, and its management arrangements;

c) a management commentary, including information on financial performance and financial position, which reflects the relationship between the Account and other central funds; and

d) a governance statement.

7 This accounts direction shall be reproduced as an appendix to the accounts.

This accounts direction supersedes all previous Directions issued by HM Treasury.

Chris Wobschall
Head, Assurance and Financial Reporting Policy
Her Majesty’s Treasury
23 March 2012

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