The National Archives Annual report and accounts 2024-25

For the period 1 April 2024 to 31 March 2025

Including the Annual Report of the Advisory Council on National Records and Archives 2024-25

Annual Reports presented to Parliament pursuant to section 1(3) of the Public Records Act 1958

Accounts presented to the House of Commons pursuant to section 6(4) of the Government Resources and Accounts Act 2000

Accounts presented to the House of Lords by Command of His Majesty

Ordered by the House of Commons to be printed on 17 July 2025

This is part of a series of departmental publications which, along with the Main Estimates 2025-26 and the document 'Public Expenditure: Statistical Analyses 2025', present the Government's outturn for 2024-25 and planned expenditure for 2025-26.

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About the Annual report and accounts of The National Archives

This document combines performance and financial data with analysis to help readers better understand our work. It sets out how we spend taxpayers' money to fulfil our remit as the official archive and publisher for the UK Government, and for England and Wales. It covers our activities from April 2024 to March 2025 (inclusive) and is divided into three main sections.

The performance report and analysis (page 7) opens with a foreword from the Chair of our Board. It includes a summary of our strategic aims and key activities during the reporting year (the performance overview), followed by our progress over the year against our budgets, business priorities, input and impact indicators and the Greening Government Commitments 2021-2025 (the performance analysis).

The accountability report (page 67) includes the Directors' report which sets out our operating structure and transparency matters, such as inclusion and diversity and whistleblowing. It also includes:

- a statement of the Accounting Officer's responsibilities.
- a governance statement on how The National Archives manages risk.

- a remuneration and staff report setting out an open account of the pay and benefits received by the executive directors and Non-executive Board members.
- disclosures on pay and pensions policies and details of staff numbers and costs.
- a parliamentary accountability and audit report, allowing readers to understand The National Archives' expenditure against the money provided to it by Parliament along with the Statement of Parliamentary Supply.
- a copy of the audit certificate and report made to Parliament by The Comptroller and Auditor General, setting out their opinion on the financial statements.

The financial statements (page 163) outline our income and expenditure for the financial year, the financial position of the department as of 31 March 2025 and additional information designed to enable readers to understand these results.

Annex A (page 215) contains the Advisory Council on National Records and Archives: 22nd Annual Report 2024-25, which describes its role, work actioned in the reporting year and details of the Forum on Historical Manuscripts and Academic Research.

Annex B (page 237) contains the Annual Report of the Independent Complaints Reviewer, which sets out information on the service and standards, an overview of both the learning from complaints and customer feedback, and of complaint activity and examples.

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1.0 Performance report

1.1 Performance overview

Foreword from Professor Andrew Wathey CBE, Chair of the Board

2024-25 has been an excellent year for The National Archives and I am immensely proud of the achievements outlined in this report. It has been a period of growth. We have made huge progress towards bringing the Parliamentary Archives and Ministry of Defence personnel records into our care. Our exhibitions saw record numbers of visitors with *Spirit of Invention* travelling to the Discovery Museum in Newcastle upon Tyne.

This year has also seen significant change for our organisation. Our former Chief Executive Dr Jeff James stepped down in July 2024 and we welcomed Saul Nassé as his successor. I would like to thank Jeff for the commitment and dedication he showed to The National Archives throughout his tenure. I am delighted to be working with Saul and I look forward to doing so over the coming years as The National Archives engages with the enormous potential presented by archives in a digital age.

We welcomed two new Non-executive Board members, Lopa Patel MBE and Nigel Baker, in place of Baroness (Ros) Scott of Needham Market and Mark Richards who reached the end of their six-year terms at the end of 2024. I would like to thank Ros and Mark for their contributions to The National Archives, in particular for their support through the Covid-19 pandemic.

Our work would not be possible without the efforts of staff, volunteers, partners, colleagues at The National Archives Trust and the Friends of The National Archives. They support the realisation of The National Archives' aims and help sustain the vital work of collecting, preserving and making accessible the public record. On behalf of the Board, I thank all our colleagues for their commitment over the past year to fulfilling that purpose. I look forward to continuing our work as The National Archives embarks upon a new phase in its journey.

Andrew Walkey

Professor Andrew Wathey CBE Chair of The Board 10 June 2025

Introduction from the Chief Executive

To the Right Honourable Lisa Nandy MP, Secretary of State for Culture, Media and Sport

I was honoured to become Chief Executive of The National Archives on 29 July 2024 and am grateful for the generous and comprehensive handover I was given by my predecessor Jeff James. He is a tough act to follow. The titles that come with the role, Keeper of Public Records, Historic Manuscripts Commissioner, Controller of His Majesty's Stationery Office and The King's Printer for Legislation, define the multifaceted nature of our organisation. We collect, preserve and share with the public the records of the state; we lead the archive sector; we license Crown copyright; and we publish legal content daily from Parliament and the courts. The National Archives is an essential part of British life and I and my colleagues on the Board and across the organisation approach our responsibilities with seriousness and humility.

I am proud of what our teams have achieved in 2024-25. I was delighted to sign the partnership agreement, alongside the Clerk of the Parliaments and Clerk of the House, that provides the basis for the relocation of the Parliamentary Archives collection to Kew. This project means that the records of the executive, legislature and judiciary will be brought together in one place for the first time. We continued our transfer of historical military service personnel records and have now received over 7 million records. We also received our largest ever single digital transfer of records

from the Grenfell Tower Inquiry, which we will now preserve and provide access to. These projects are emblematic of the variety of our custodianship – from the historic to the contemporary, encompassing the physical and the digital.

Our exhibitions and events programme this year has been successful in broadening our reach, allowing people from all over the country to interact with records that represent our shared history. Our *Great Escapes* exhibition ran until 21 July 2024 and was the springboard for our young people's animation project this year, which was supported by the Friends of The National Archives. I was very pleased that The National Archives Trust was able to fund a new programme to facilitate schools' visits to the Clore Learning Centre, a great example of how we can work together with people and organisations who share our desire to make an impact with our content.

Our biggest assets are our talented teams and our extraordinary collections. Every single day the two combine to deliver lasting impact to citizens and to our nation. I am proud to present this year's annual report.

Sand Nami

Saul Nassé Chief Executive and Keeper of Public Records 16 July 2025

The National Archives in numbers

- 5.9km records accessioned this year
- 2.1m Ministry of Defence service personnel records transferred
- 1,100 gigabytes transferred our largest single transfer ever – for the Grenfell Tower Inquiry
- £2m+ income from grants in the 2024-25 financial year
- 8% less carbon dioxide emitted compared to 2023-24
- 24k+ schoolchildren taught online or on site

Who we are

The National Archives is a non-ministerial government department and the official archive and publisher for the UK Government, and for England and Wales. We are guardians of over 1,000 years of history, and our collection contains over 11 million historical government and public records.

The National Archives is a cultural, academic and heritage institution, and fulfils a leadership role for the archive sector. Our historic mission endures: to collect and preserve the record, to use our expertise and knowledge to connect people with their history through our unrivalled collections and to lead, partner and support archives at home and worldwide. We are expert advisers in information and records management and are an increasingly digital archive.

In short, we are a living, growing repository of evidence, stories and memory, and our collection is accessible to everyone.

Our goals for 2024-25 were organised under three themes: building the value of our **collection**, sustaining value through **custodianship** and creating value through **connection**. The following section outlines our achievements in pursuing these goals, alongside the challenges we have faced in doing so.

Our year 2024-25

Building our collection

As the archive of the state, a crucial part of our public task is accessioning public records. Central government departments and certain other public bodies transfer records of historical value for permanent preservation to The National Archives after 20 years. These records are increasingly born-digital, and we are achieving continuous growth of the digital archive. We are also accessioning new physical records, and this year made significant transfers across several projects.

Parliamentary Archives Relocation Programme

- This programme oversees the relocation of the Parliamentary Archives – its collections and some associated services and staff – from the Palace of Westminster to The National Archives. In February 2025, our Chief Executive Saul Nassé, Clerk of the Parliaments Simon Burton, and Clerk of the House Tom Goldsmith, signed the partnership agreement that provides the basis for the relocation. For the first time the records of the executive, legislature and judiciary will be brought together at The National Archives, allowing researchers to access in one place the documents which have helped shape our society.
- We paused transfers of the physical collection to focus on completing the agreement and are now expecting to take custodianship of the entire collection of circa 15 linear km of historical documents by September 2025. We

completed a successful trial process for business-critical access to documents in the interim period to ensure they remain accessible prior to full-service delivery. To operate the public service, we need to add the catalogue of the records from Parliament to our systems. This is a substantial and complicated data migration task. This work was delayed until the signing of the partnership agreement in February 2025, and we now expect to complete it in the next financial year. In the meantime, we began to set up infrastructure and established a secure home for the collection's descriptive data. We also completed the migration of the Web Archive, integrating the content and workflows with our operational systems.

Public Inquiries

- Work to support Public Inquiries has been a priority this year. These records are increasingly born-digital and are more contemporary than our typical transfer. They represent investigations of issues of serious public concern, and it is crucial that information created or used during the course of an inquiry is managed to ensure its survival. It is also important that these records are accessible to the public, especially for those affected, future policy makers and researchers. We therefore offer expert advice and guidance to inquiries, such as best practice and standards in information management and on the preparation and cataloguing of records selected for transfer.
- Of particular importance this year has been our work to transfer records from the Grenfell Tower Inquiry to

The National Archives. At over half a million records amounting to 1,100GB of data, this was the largest single digital transfer we have completed. In February 2025 we saw the first of these records made available to the public. Given their national significance, we have published a research guide that explains how the public can access this collection. Although we are largely managing these records in the same way as any others, we want to make clear that, for some, they may be difficult to read. We have therefore amended our cataloguing practices to alert users to the potentially distressing nature of the records.

Ministry of Defence personnel records

 We have made good progress with our project to transfer almost 10 million historical military service personnel records from the Ministry of Defence (MoD) to The National Archives. This is the largest physical transfer in The National Archives' history. We expect full receipt of these records to add 50 linear km to our collection and to double our number of orderable records. We took over 2 million records into our care this year, bringing the total transferred to over 7 million and leaving us on track to complete the transfer project by March 2027. As we grow more familiar with these records, we increasingly recognise how valuable a collection they are. However, the size of the collection does continue to create challenges. As well as physical storage demands, 2024-25 has seen an increased interest in the MoD service records through Freedom of Information (FOI) requests. In 2024,

The National Archives accounted for over 40% of all requests to government, compared to 30% in 2023. We received 32,575 FOI requests in total, with approximately 29,000 for the service personnel records, making them our most frequently requested records.¹ Our rate of FOI compliance has decreased from 58% in 2023 to 53% for 2024. We developed an FOI Action Plan² following the Information Commissioner's Office Practice Recommendation. As part of the plan, we have recruited staff to facilitate the production of records, cataloguing, access service and service transformation.

Our Digital Archive

• This year we strove to improve the decision-making processes according to which transfers are made, working with government to raise standards in information management. We continued to develop a modular self-assessment tool for government departments and piloted a new maturity assessment framework focussed on the appraisal, selection and sensitivity review of digital records. This year we generated maturity assessment reports for seven departments. We also hosted the third annual Artificial Intelligence (AI) for Government Knowledge Managers conference. More than 100 delegates from across government attended, with sessions led by government's Chief Technology and Chief Data Officers, amongst others. Working with the

¹ For more information, please see <u>gov.uk/government/statistics/freedom-of-information-statistics-july-to-september-2024/freedom-of-information-statistics-july-to-september-2024-bulletin</u>

² www.nationalarchives.gov.uk/about/freedom-of-information/foi-action-plan/

Knowledge and Information Management teams from several government departments we are building a proof of concept, at scale, for using AI for retention, disposal and appraisal decisions.

 We have worked hard to scale-up and improve the way digital records are transferred to us from government. As we continue to accession near-contemporary digital records at scale, we have been making improvements to our Transfer Digital Records (TDR) service, adding features that enable users to review metadata on transfer as well as separately uploading it. This will enable larger scale digital transfers through TDR. This year we received 23 digital transfers from government departments through TDR and 11 through transfer on physical media. We also released into private beta an end-to-end digital archiving service which makes it easy for record managers in government departments to transfer born-digital records to us. It enables us to seamlessly process these records through to access services such as Discovery (our catalogue) and Find Case Law and ingest them into the preservation service for long-term safe keeping. In addition, we completed the first phase of development to transfer records from the Cloud, extracting this content from SharePoint to a specific destination without loss or degradation. This has the potential to be a significant innovation as it widens the scope of digital records that can readily be transferred, paving the way for future growth.

• The ready availability of legislation is an important part of our offer. This year we concluded work to bring our revised versions of UK legislation up to date with amendments made by EU Exit legislation and continued to apply changes to legislation resulting from the Retained EU Law (Revocation and Reform) Act 2023. We also awarded a new concession for The Gazette, the official journal and newspaper of record. The new contract came into operation at the beginning of January 2025. This is one of the main sources of commercial income for The National Archives and the new arrangements deliver an improved return.

Custodians of our records

As custodians of the records entrusted to us, we must invest in skills, capability and infrastructure. This is part of our statutory obligation under the Public Records Act 1958 and a core part of our Public Task. This year we have made significant investments in our buildings to ensure that the 174.5km of physical records stored on site at Kew are properly preserved. We are also investing in our digital infrastructure to secure born-digital records long term.

Our site

- At our site in Kew, we have enhanced the environment for our records. A grant from the Department for Science, Innovation and Technology enabled us to upgrade the environmental monitoring system in our repositories. This comprises a state-of-the-art Internet of Things Long Range Wide Area Network (LoRaWAN) environmental monitoring system, consisting of 400 indoor sensors and an external weather station. This has doubled the sensor grid density and expanded the range of spaces under monitoring. The new system allows us to not only track fluctuations in temperature and relative humidity, but also to analyse the factors contributing to these changes. By cross-referencing environmental data with other variables, we can assess human presence, solar heat gains and ventilation efficiency, enabling a more informed response to microclimate variations.
- In April 2024, we began a project to replace all the windows in the older section of our building. This

project will ensure we continue to protect and conserve the collections by restoring efficient operational and environmental performance in the repositories. Phase one included work on the second, third and fourth floors, and was originally programmed to be complete by January 2025. While late delivery of materials, variations to the contract and a more complex programme for the cleaning of the external façade pushed back completion, we completed this phase by the end of the financial year. To evidence performance and to ensure the window installation and associated works are fit for purpose and meet the required standards, water testing took place in December 2024 by an independent UKAS accredited company.

 We continue to explore options for the optimal use of our Kew site and our future estates needs more widely. This is driven by our operational need for additional storage, our strategic ambitions and our role supporting the delivery of wider government policy and missions. We have progressed our thinking about a second complementary site this year in this context.

Our digital records

 Alongside developments in the digital infrastructure that supports the growth of our collection, we have been working towards reducing the preservation risk for digital public records wherever they are held. This year we introduced a new, cloud-based, digital preservation system as part of which we are maintaining a separate custodial copy of digital records. We have continued to maintain and support our open-source digital archiving tools, DROID and CSV Validator, with some new features added this year. We have also maintained the registry of file format signatures (PRONOM) that is relied on by digital preservation teams around the world. There were three releases to PRONOM this year, with 104 new signatures added to the registry.

- We have paid close attention to the lessons of the British Library's cyber security incident and have taken steps to improve our own cyber resilience. This has involved both technical measures and raising awareness across the organisation about the importance of cyber security. During the year, we have seen several bot attacks on our digital services which we have been able to manage. Cyber security is a corporate priority as well as an area of increased focus for our IT teams.
- Al has been a dominant topic across government this year and we have been involved in this work through our connections with the Department for Science, Innovation and Technology and our partnership working with the Incubator for AI in the Cabinet Office. We are identified in the government's *AI Opportunities Action Plan*³ as one of the bodies that holds valuable cultural data sets that could prove to be important in unlocking the potential of AI. As such, we have a defining and unique opportunity to support government ambitions to harness AI for the good

³ gov.uk/government/publications/ai-opportunities-action-plan/ai-opportunities-action-plan

of the country. We are committed to its safe, responsible and effective use.

Building organisational capacity

- A key part of ensuring care of our collection, as well as securing and delivering our content, is obtaining and retaining people with the skills to do so. In 2024-25, we developed a strategic workforce capability plan to identify the potential skills and capabilities we will need for the future.
- We are undertaking a review of our approach to pay and benefits. We have run focus groups, including with the unions and senior leadership to better understand the issues as well as undertaking a benchmarking exercise.
- Our staff continue to engage with the Civil Service Staff Survey, and we use our rolling staff engagement action plan to aid accountability for acting on the themes coming out of the survey. For more information on these topics, please see the staff report on page 129.

Creating lasting impact through connection

Providing access to our collection is central to our task as we actively seek to optimise its public value. This year we have forged ahead with our ambition to connect people with our collection in person, online and through education, promoting equity of access to our collections on site and across the country. In doing so, we endeavour to create an inclusive, collaborative and available national archive.

Public access

 Delivering access to our physical records is a cornerstone of what we do, enabling the public to connect with our records on a very personal level. This year saw 38,856 visits to the reading rooms, a slight increase on last year, with 10,714 reader tickets issued and 58% of visits booked in advance. We produced 365,593 documents for the public which was a slight decrease from last year. We delivered 90.8% of requests in under an hour. Our front of house team steered people through their searches, processing over 23,217 emails, 65 letters and 20,748 Live Chat enquiries. The number of Live Chat enquiries has almost doubled since last year. We received 201 government department visits during which 6,699 documents were viewed and 20,180 pages were copied. Overall, access to the reading rooms and the direct access to our records that they provide has remained stable, and 95% of visitors were satisfied or very satisfied with their visit.

 We have made progress this year in digitising our records as part of our ambition to radically widen access to the historical archive. Of note, we digitised all five volumes of Domesday (Great and Little), The National Archives' most famous early public record. This has been a momentous logistical effort and will allow us to engage new audiences with this unique record. We also completed the digitisation of watermarks from the Fife Newton volumes held at The National Archives. Approximately 5,000 images of watermarks from the manuscripts of Isaac Newton from our collection were added to images from collections at Cambridge University Library and the Huntington Library in the US. These images are being used to train machine learning algorithms for a future AI tool that will automatically identify watermarks. Our in-house digitisation team created more than 1.5 million images this year and contributed to major projects including the National Farm Survey digitisation programme. Also in 2024-25, our academic primary resource publishing partners published almost 2 million images of documents held at The National Archives, and our genealogy partners published more than 5.5 million new images including over 1.6 million from the MoD Service Personnel Records collection published for Remembrance Day in 2024.

Exhibitions, education and outreach

 Our exhibition, Great Escapes: Remarkable Second World War Captives, ran until 21 July 2024, exploring the stories of prisoners of war and civilian internees during the Second World War. 13,715 visitors attended across the full run of the exhibition, with 7,755 this financial year, and visitor satisfaction was high at 93%. Based on this exhibition, and supported by the Friends of The National Archives, we hosted our annual young people's animation project. Over the course of a week, participants aged 16-19 from across England researched a story of an escape using the original archive files. They created their own stop motion animation films working with film-maker Nigel Kellaway. We held a film premiere and showcase in February 2025.

- Despite the closure of our gallery for renovations for most of the year, we attracted the most visitors ever to our exhibitions with a total of 28,765 visitors across 2024-25. This was in large part due to a new touring exhibitions programme through which we opened our family exhibition, *Spirit of Invention*, at the Discovery Museum in Newcastle upon Tyne. In partnership with Tyne & Wear Archives & Museums, the exhibition ran from March to June 2024 and attracted 24,000 visitors, 21,010 in this financial year. Extending the reach of this exhibition advances our aim to create an inclusive and available archive for people across the country.
- Our education service continues to thrive. We engaged with more than 40,000 students in total through workshops (24,898, including 17,457 online and 7,441 on site) and digital resources developed using the Clore Learning Space (over 15,700). These digital resources included 'Archives Live: D Day' with special guest Dan

Snow in June 2024 and a series of Key Stage Three short assembly broadcasts, 'History Mysteries'. 86% of our workshops were delivered to state schools and we have diversified access geographically with 41% of education workshops booked by schools outside London and the South-East (56% for online workshops). With the support of The National Archives Trust, we have launched a travel bursary scheme for schools. This scheme offers a £500 grant for schools that would otherwise find visiting to be financially prohibitive. On launch, the programme was immediately oversubscribed with applications from as far as Torquay and Durham. 15 bursaries were awarded in 2024-25.

• Our outreach team have run numerous successful projects, engaging communities with the records in our collection. The National Archives was the official partner for the 'Arts in Care Homes' campaign which aims to bring creativity into hospitals, care homes and community spaces. Our online resource 'My Home' was a primary resource for the campaign, having been created in partnership with learning disabled adults through Mencap and Share Community.⁴ We have also developed 'Sensing the Archives', a new workshop designed for blind and partially sighted students. Funding received from the Friends of The National Archives will meet the costs of tactile images and we are very pleased to be able to broaden access in this way.

⁴ nationalarchives.gov.uk/education/outreach/my-home/

Media and events

- Our media reach continues to ensure that prompted public awareness of The National Archives remains high at 81%. In December 2024 we released a selection of 2004 Cabinet Office files covering Tony Blair's Labour administration. Many news outlets carried news of the Downing Street visitors' books being made available for the very first time and commentary on the Blair Government's decisions on immigration policy. January 2025 saw the release of a set of previously unseen MI5 files covering the organisation's early years before the First World War up until the mid-1970s. Their release was received with great interest, with more than 50 journalists attending the release event generating local, national and international news coverage. All the files were digitised and made available to explore, view and download from Discovery. We were delighted with the public reception to these releases and they will form part of a new exhibition, MI5: Official Secrets.
- Our podcast On the Record continues to go from strength to strength with eight new episodes released in 2024-25 and 47,134 downloads during the year from all available episodes. The episode 'Pauper Voices' was downloaded 3,400 times in the first 90 days, our highest figure to date.
- Online, our events programme has reached approximately 21,450 attendees with 92% satisfaction, despite the necessary cancellation of several events in the period leading up to the General Election. Highlights from our author talks programme include Miri Rubin's

- 'The story of Europe's medieval Jewish communities' and Professor Louise Wilkinson's 'Eleanor of Castile: Queen of Hearts?', which attracted 1,178 and 1,315 attendees respectively. Talks by our own experts also attracted significant audiences, totalling almost 8,000 across the year.
- Our collections continue to be used in national events for engagement purposes. This year we accessioned the coronation roll of Their Majesties King Charles III and Queen Camilla, and on 1 May 2024 our staff attended the presentation of the coronation roll to Their Majesties at Buckingham Palace. They were able to provide information on the form, function and materials of the existing coronation rolls held at The National Archives, dating back to 1308, after helping to shape the contents of the new roll. It will be on display as part of *Happy and Glorious: Coronation Commissions*, our joint exhibition with the Government Art Collection, from May 2025.

International collaboration

In 2024-25 we continued to support the government with cultural diplomacy activities at home and abroad and our collections have made appearances at several international events. In July 2024, we displayed the 1949 Treaty of London which set the Statutes of the Council of Europe, at the European Political Community Summit at Blenheim Palace. The Summit was attended by more than 50 leaders, many of whom saw the Treaty and remarked on the importance of history and archives. The Treaty was later displayed in Parliament at the Lord

Speaker's Lecture. We have also contributed to Official and State Visits to highlight the longevity of British diplomatic relations.

- We hosted numerous international delegations and shared expertise and advice on a variety of topics, notably new technologies, digital preservation, conservation, research, records management, policy and digitisation. Genuine partnerships and capability-building have remained at the centre of our approach. We also hosted many British diplomats prior to their postings, enabling them to better understand the history of the countries to which they are accredited and that of their relationship with Britain.
- In addition, we have been developing international business partnerships to support archives globally.
 These have included work with the Archives Department in Barbados, the Royal Commission of AlUla in Saudi Arabia and the Royal Court of the Kingdom of Bahrain.

Engaging the wider archive sector

We play an active role in sustaining and optimising the value and impact of archives through research, scholarship and other archival institutions. We take seriously our leadership role for the archive sector in England and are an Independent Research Organisation.

Archive sector leadership

 Following a commission by the Department for Culture, Media and Sport, we have been working to produce a new Strategic Vision for the Archive Sector. We partnered with BOP Consulting to carry out an extensive consultation of more than 400 archive professionals, stakeholders and users to inform the new vision. It will be finalised with ministers in 2025-26 and will guide our leadership of the sector to ensure that archives across the country thrive. We have also developed other partnerships and research to ensure that strategic thinking is informed by up-to-date information. Building on two archive sector-wide surveys conducted in 2024, we partnered with Public Record Office of Northern Ireland, National Records Scotland, Archives and Records Association and the Welsh Government to organise the first-ever UK-wide archive sector survey. Further, 251 archive services responded to the 2024 Accessions to Repositories survey, which reports on manuscript accessions throughout the British Isles, detailing more than 13,600 collections. The results of this survey allow us to identify needs for funding and development. We also continued to implement our collaboration agreements with key partners including the Archives and Records Association, Research Libraries UK and Arts Council England, and have developed closer working relationships with colleagues from the Home Nations and the Local Government Association.

 We launched an expanded Archives Revealed programme funded by the National Lottery Heritage Fund, Wolfson Foundation and Pilgrim Trust. £708,351 was awarded in its first funding rounds across 21 projects (including £538,970 in cataloguing grants), with nearly £2 million to be awarded in 2025-26. This is an enormous increase in our ability to support the archive sector across the UK. A full programme team, expert panel and evaluation partner were recruited to this programme as we build a stronger impact and evidence base for the role of archives in society. Outside of *Archives Revealed*, 36 grants worth £208,603 were awarded across our Risk, Resilience, Engagement, Research and Innovation and Skills programmes, providing support to the archive sector across its strategic needs. We received more than 200 applications for funding across all our programmes.

- 2024 marked the final collecting year of the Records of Local Interest 20-Year Rule New Burdens programme.
 Over the ten years of the programme, 2024 saw the highest number of public records accessioned by 50 local authority archive places of deposit, totalling 2.7 linear km. Colleagues across the sector also use Discovery as a platform to make their collections data more accessible, with more than 730 collections added this year. Archive Service Accreditation, the UK-wide sector standard, continues to flourish and there are now 189 Accredited Archive Services.
- We offered a wide range of training and events for archive professionals this year. We ran 17 training courses and 26 events on current issues for the sector, including basic conservation, carbon literacy, digital advocacy, digital exhibitions, legacy and major donor fundraising, understanding manorial records, volunteer management and writing job descriptions. 'Our Digital

Century', a programme launched last year to support digital skills and capacity building in the sector, has seen many key developments. These include guidance on producing and using Digital Asset Registers, refreshed guidance on Digital Preservation Workflows and a fifth round of the Peer Mentoring Programme. We have also continued to contribute to safeguarding vulnerable archive collections, working collaboratively across the sector with the Crisis Management Team focusing on business archives.

Research

- We launched this year our Research Vision for 2024-27.5 This identifies areas of research interest spanning our responsibilities: trusted and secure custodianship, a responsible and sustainable future, global and inclusive access and an archive within and for our society. It also contains a Roadmap to connect that organisational vision to the work of our Research, Grants and Academic Engagement department, outlining key actions to grow the value, profile and strategic impact of our research and grants portfolios.
- We received £2.04 million of income from grants in the 2024-25 financial year, an increase of 95% on 2023-24 and of 215% on 2022-23, and our most successful year ever. Major grants won this year include: £5.6 million from the National Lottery Heritage Fund, Wolfson Foundation and Pilgrim Trust for *Archives Revealed*; £1 million

^{5 &}lt;u>nationalarchives.gov.uk/about/our-research-and-academic-collaboration/our-research-vision/</u>

from the Arts and Humanities Research Council for Spaces, Places and Belonging, a new hub for community research in the cultural heritage sector; £1 million from the Lloyd's Register Foundation for PASSAGE, a research and global mobility programme on transatlantic slavery; and £1.32 million from the Arts and Humanities Research Council for two projects in their Research Infrastructure for Conservation and Heritage Science (RICHeS) programme. The PASSAGE and RICHeS projects grew from pilot work funded by our Strategic Research Fund, which funded a further 11 projects in this financial year. In terms of grant development, we submitted 53 grant funding applications with a total value of £5.03 million.

1.2 Performance analysis

This section provides detailed analysis of our progress over the year against our budgets, business priorities, input and impact indicators and the Greening Government Commitments 2021-2025.

The Public Sector Budgeting Framework

The budgeting system is designed to support the government's public spending. Estimates are the mechanism by which Parliament authorises departmental spending and are presented using the public sector budgeting framework. Estimates require Parliament to vote limits for different budget categories of spending. For The National Archives, the categories are:

Net Resource Departmental Expenditure Limit (RDEL) Net Capital Departmental Expenditure Limit (CDEL) Annually Managed Expenditure (AME)

The RDEL budget is further split into Programme, which covers expenditure on front line services, and Administration, which covers all other expenditure not included in Programme.

Departments are required to report outturn against Estimate (see SoPS statements on page 142). A breach of any of the budget limits would result in an Excess Vote.

A summary of The National Archives' outturn in all categories compared with previous years is shown in the table below.

Outturn	2024-25	2023-24	2022-23	2021-22	2020-21
	£000	£000	£000	£000	£000
RDEL Income	(20,945)	(15,224)	(14,346)	(12,678)	(10,981)
RDEL Expenditure	67,920	63,921	60,522	52,918	47,479
RDEL Total	46,975	48,697	46,176	40,240	36,498
CDEL	7,417	3,283	5,296	6,383	3,524
AME	4	(24)	(5)	(142)	-
Total Expenditure	54,396	51,956	51,467	46,481	40,022

The Common Core tables detailing financial expenditure for the current Comprehensive Spending Review can be found on The National Archives website under the Appendices.⁶

Financial management commentary Parliamentary support – Income and expenditure

The National Archives is largely funded through supply voted by Parliament. We are also partially funded by income generated through fees and charges, our commercial activities, and grants. We received additional funding of £1.8m from HM Treasury this financial year to support our work to apply the legislative effects of the Retained EU Law Revocation and Reform Act 2023.

⁶ nationalarchives.gov.uk/annual-report-and-accounts-2024-25/

Budget	Outturn	Estimate	Variance
	£000	£000	£000
Non-ringfenced RDEL	39.3	40.1	(0.8)
Depreciation	7.7	8.2	(0.5)
RDEL	47.0	48.3	(1.3)
Capital	7.4	7.7	(0.3)
Total DEL Outturn	54.4	56.0	(1.6)

Our net DEL outturn was £54.4 million (2023-24: £52.0 million) compared to the HM Treasury net allocation of £56.0 million: a £1.6 million or 2.9% variance.

Our resource (RDEL) outturn for 2024-25 was £47.0 million compared to a budget of £48.3 million. The variance of £1.3 million (2.7%) was in part driven by an underspend of £0.5 million in our ringfenced depreciation budget due to some assets under construction not being complete at year-end and thus not yet depreciable. Our non-ringfenced RDEL budget, our largest budget which accounts for our day-to-day operational expenditure, was £0.8 million (2%) under budget. This underspend was driven by some additional income in the final quarter of the year.

Our capital outturn was £7.4 million against a budget of £7.7 million. The underspend of £0.3 million was due to underspends on various projects during the year and some slippage of costs into the next financial year.

Total operating expenditure

Total Operating Expenditure for delivering our remit as the official archive and publisher for the UK Government, and for England and Wales, was £67.9 million (2023-24: £63.9 million).

Staff costs amounted to £33.2 million (2023-24: 32.7 million). The increase in staff costs was partly driven by an increase in staff numbers as well as a staff payrise of 4.95%. There was also an increase in pension costs following the change in Civil Service pension rates. However, spend on agency staff and contingent labour was lower this year, after a particularly high 2023-24. The average full time equivalent (FTE) number of staff employed in 2024-25 was 583 (2023-24: 569).

Operating Expenditure, excluding staff costs, depreciation, provisions and audit charges, amounted to £26.2 million (2023-24: £23.7 million). This increase was due to a one-off cost of sale relating to the resale of the 1921 Census to Ancestry (associated income has increased, see below), grants paid out through the Archives Revealed programme, higher IT Data Storage costs, as well as inflationary increases in utility costs.

Total operating income

Total Operating Income for the financial year was £20.9 million (2023-24: £15.2 million). The rise was driven by increased income from The Gazette, licensing resales (including the resale of the 1921 Census)

and increased charges for services delivered to other government departments.

Total capital expenditure

Total Capital Expenditure was £7.4 million (2023-24: £3.3 million), of this £2.6 million (2024-24: £1.9 million) funded our continued investment in digital services. This included continued development of:

- TDR, The National Archives' new digital transfer service that helps bodies subject to the Public Record Act upload, prepare and transfer their selected digital public records for permanent preservation.
- Project ETNA, the multi-year redevelopment of The National Archives' website and catalogue.

We invested £3.0 million in our estate infrastructure (2023-24 £1.2 million). This included work on a significant windows replacement project.

Financial position

Assets and liabilities are shown in the Statement of Financial Position on page 164.

Total assets as at 31 March 2025 were £215.8 million (2024: £213.6 million). Property, Plant and Equipment, Right of Use Assets and Intangibles represented 96.1% of the asset value (2024: 96.5%). The increase of £2.2 million is largely due to:

 continued investment in our digital infrastructure as well as improvements to the physical site at Kew. • an increase in accrued income at year end, which reflects the overall increase in income seen throughout the year.

Total liabilities as at 31 March 2025 were £14.4 million (2024: 15.7 million). The reduction of £1.2 million is largely due to:

- a large reduction in trade payables due to key suppliers submitting invoices a little earlier, allowing for prompt payment at year end.
- A reduction in the lease liability relating to the storage facility at Deepstore.

Performance against our business priorities

Business priority and how we were to achieve it

Status at end 2024-25

Enhanced offer to government in relation to the management and transfer of digital records. We will streamline the processes for managing digital records and expand the digital archive (see page 16 for more detail).

Partially completed – We delivered a minimum viable digital transfer process. Work on amendments and scaling continues in 2025–26 with targets to improve service coverage.

We will deliver our part of the Government's programme to review, revoke or reform retained EU law (see page 19).

Completed

We will have agreements with Parliament in place and will be on track to complete the relocation of the Parliamentary Archives (see page 13).

Partially completed – Partnership agreement signed in February 2025. By year end, 2km of records (approximately a third of the outstanding material) was successfully transferred to Kew. We remain on track to take custodianship of the entire physical collection of the Parliamentary Archives by September 2025. Work continues on phased description releases and aligning digital transfer requirements, though challenges remain around the supporting digital infrastructure and processes.

We will continue to transfer and make available Service Personnel Records in 2024-25 as part of the multi-year Ministry of Defence transfer programme (see page 15).

Partially completed – We transferred over 2 million records. The backlog reduction continues this year, with SMART metrics on compliance, caseload, and resolution rates.

Completed transfer of 3 high level Public Inquiries with an effective access service offer in place (see page 14). Partially completed – Grenfell Tower Inquiry transfer completed; others delayed. Further transfers continue in 2025–26, with targets by inquiry and transfer method.

We will complete development of the new infrastructure that supports The National Archives presence on the web. This, and initiatives within our public and education programme will enable us to grow a bigger and more diverse audience (including schools) at Kew and across the nation online (see page 23).

Partially completed – Our education participation increased, although visitor numbers were impacted by gallery closure. Engagement and outreach continue this year with targets for exhibitions, education, and regional programmes.

Build a bigger, broader and more strategically impactful research and grant funding portfolio, through the launch and implementation of the Research Vision for 2024-27 (see page 32).

Completed

A completed business case for and significant progress towards a second, regional location (see <u>page 19</u>).

Partially completed – We produced a strategic outline business case which was endorsed by the Board in Summer 2024. Further work to develop the case was paused, pending a review of strategy.

We will ensure we have a
robust and costed plan to
meet The National Archives'
storage capacity needs in short
and medium term.

Completed

Sustainable infrastructure in place to support the growth of our collection as we become the archive of the state (see page 20).

Partially completed – Phase 1 upgrades and cyber improvements have been delivered. Work on legacy systems and resilience continues in 2025–26, with SMART metrics for WIZ score, Sentinel rollout, and continuity testing.

We will consult on, develop, and launch the Government's Strategic Vision for the Archive Sector. With roll out from Q1 of 2025-26 (see page 29).

Partially completed – A draft has been produced and approved internally. We are awaiting ministerial review; rollout planned for 2025–26 with milestones for consultation and publication.

Performance against our input and impact indicators

Our input and impact indicators demonstrate our overall performance as an organisation and our commitment to quality, as well as illustrating evidence of the effectiveness of the priorities set out in our business plan. They are presented as year-on-year comparisons so that we can track our progress within any given year.

Performance against our input indicators

Input indicator	2024-25 Outcome	2023-24 Outcome	
Original records delivered to on site users	486,486	600,191	
Electronic records delivered to online users	306,300,000	339,800,000	
Staff diversity (average):			
Women (overall)	51.6%	51.5%	
Women (top management)	50%	50.8%	
Black and Minority Ethnic	14.9%	18.2%	
Disabled	8.5%	8.9%	
Staff engagement (as reported by the Civil Service People Survey)	68%	67%	
Time taken to deliver original records to on site users	records to on orders delivered within ord		

Input indicator	2024-25 Outcome	2023-24 Outcome
Time taken to respond to Freedom of Information and Environmental Information Regulation requests	Our FOI performance figures are reported on an annual basis as part of the FOI statistics published by Cabinet Office. The performance rate figure for the calendar year 2024-25 is 53% ⁷	Our FOI performance figures are reported on an annual basis as part of the FOI statistics published by Cabinet Office. The performance rate figure for the calendar year 2023-24 is 58%
Total departmental spend	£47.0 million	£48.7 million
Staff sickness absence	6.75 days per FTE (average)	7.4 days per FTE (average)
Outstanding effects on legislation.gov.uk	153,004 amendments applied to legislation on legislation.gov.uk	107,094 amendments applied to legislation legislation.gov.uk
Number of physical records accessioned ⁸	1,098,969 pieces, 5,980.37 metres	469,694 pieces, 3,168 metres

In February 2021 the MoD began the transfer of historical service personnel records to The National Archives. There are approximately 9.7 million records which will be transferred over 6 years. Having transferred over three quarters of this collection already (approximately 7.7 million records), this has resulted in a 308% increase in the volume of requests received by The National Archives in 2024, compared to 2022. This has impacted the overall percentage of requests responded to 'in time' as well as the overall timeliness across all monitored bodies. More information can be found at nationalarchives.gov.uk/about/our-role/plans-policies-performance-and-projects/our-projects/ministry-of-defence-service-records/ and gov.uk/government/statistics-annual-2024-bulletin.

⁸ These figures include over 1 million records accessioned through the MoD service personnel records project. In 2022-23, these records accounted for 80% of total accessions but only 40% of the space used. This increased to 90% of records and 67% of space in 2023-24, and 95% of records and 85% of space in 2024-25.

Performance against our impact indicators

Impact indicator	2024-25 Outcome	2023-24 Outcome
Web archiving	Web archive services – sessions: 1,428,4429	Web archive services – sessions: 1,367,983
	Web archive services – users: 1,003,864	Web archive services – users: 865,008
Customer satisfaction:		
On site users	95%	94%
Online users	83%10	79%
legislation.gov. uk users	66%	66%

Since 2021-22, what we previously referred to as UK Government Web Archive 'visits' have been termed 'sessions' and what was formerly 'visitors' is now termed 'users' to be consistent and clear with respect to our analytics data, which now uses Google Analytics. The effect of this is to reduce the headline figure in comparison to server log analysis, which was our previous method. Furthermore, we are now reporting usage metrics for two web archive services: the UK Government Web Archive nationalarchives.gov.uk/webarchive/ and the European Union Exit Web Archive webarchive.nationalarchives.gov.uk/eu-exit/.

¹⁰ As of 2022-23, we began to calculate our online customer satisfaction rating (% of people saying they were either satisfied or extremely satisfied) from responses to our free digital downloads and Discovery catalogue services, in addition to our Book a reading room service. Including more surveys allows for greater understanding of our overall online performance.

Impact indicator 2024-25 Outcome

Records and information management services used across government

Our Information Management Assessment programme has evolved into a modular selfassessment tool focused on digital records. We generated IMA reports for seven departments and engaged with 25 more to develop a new maturity framework for digital records appraisal. We also benchmarked our M365 model government departments. with government users and the wider record management community through our collaboration with IRMS.

After focusing on content development this year, we have begun the agile product development of a new platform to transform these tools into a web-based selfassessment service. It will enable users to submit and manage their assessment data, generate insights, and track progress over time. Automating these processes will allow us to scale the service, making it accessible to all organisations subject to PRA, and provide us with sector-level insights on digital record management practices and challenges.

2023-24 Outcome

Our Information Management Assessment Programme was renewed to provide government bodies with practical tools to evaluate their information management practices, risks and compliance with the S46 Code of Practice. This year, we delivered reports to ten We continue to develop the programme with the aim to make it available to all public record bodies and to exploit it as a source of data for monitoring trends and challenges, particularly in digital record management in a continuously evolving technological landscape.

Further details of how we measure our performance, our long-term strategic plans and our transparency reporting can be found on our website: <u>nationalarchives.gov.uk/</u> about/our-role/.

Environment and sustainability report

Overview

The National Archives has continued to make progress against the Greening Government Commitments (GGCs) 2021-25 and is aligning with the Task Force on Climate-related Financial Disclosure (TCFD) framework for public sector bodies.

We are aligning with HM Treasury's TCFD guidance, considering climate as a principal risk. Disclosures have been made for Governance, Risk Management and Metrics and Targets, with ongoing work on Strategy in line with government timelines.

We performed well against GGC targets, meeting or nearly meeting most targets, though some remained challenging due to the nature of our operations. Overall GGC-scoped emissions fell by 46% compared to the 2017-18 baseline, short of the 58% target. We have, however, achieved an 81% reduction since 2010. We have reduced water consumption by 25%, exceeding the 8% target, and overall waste dropped by 59%, well beyond the 15% goal.

While we have focused on the 2021-25 GGC targets, we are also working towards government goals of reducing emissions by 65% by 2030 and 78% by 2035 (both against 1990 levels), and of achieving Net Zero by 2050.

This commitment is balanced with The National Archives' core responsibility to preserve the nation's collection, which requires operating within carefully controlled

environmental conditions that can affect decarbonisation options. The organisation is continuing to explore how it can manage these dual priorities as part of its estate and adaptation planning.

We continue to actively collaborate with other government bodies to share best practices. Membership of the National Museums Directors Council supports carbon reduction, biodiversity, and visitor engagement efforts. Additionally, our Sustainability Lead co-chairs the International Council on Archives Climate Change Working Group, sharing best practice globally.

Sand Nami

Saul Nassé Chief Executive and Keeper of Public Records 16 July 2025

Sustainability accounting and reporting

This report reviews our 2024-25 activities and progress against GGC targets, prepared according to HM Treasury's Sustainability Reporting Guidance¹¹ and TCFD Phase 1 and 2 requirements.¹²

Further information on our sustainability work is available on our website: nationalarchives.gov.uk/about/our-role/transparency/energy-environment-and-sustainability.

Task Force on Climate-related Financial Disclosure

The National Archives has reported on climate-related financial disclosures consistent with HM Treasury's TCFD-aligned disclosure application guidance, which interprets and adapts the framework for the UK public sector. The National Archives considers climate to be a principal risk, meaning that we have complied with the TCFD recommendations for disclosures around:

- Governance recommended disclosures (a) and (b).
- Risk management recommended disclosures (a) to (c).
- Metrics and targets recommended disclosures (a) to (c).

The organisation is continuing to build its internal capability and evidence base in preparation for Phase 3 disclosures, including scenario analysis and strategy-related reporting.

¹¹ gov.uk/government/publications/sustainability-reporting-guidance-2024-25

^{12 &}lt;u>gov.uk/government/publications/tcfd-aligned-disclosure-application-guidance/task-force-on-climate-related-financial-disclosure-tcfd-aligned-disclosure-application-guidance</u>
application-guidance

Risk Management and Governance

The National Archives recognises climate change as a long-term strategic risk to its operations and mission.

The National Archives is in the early stages of identifying and assessing climate-related risks. These risks are currently managed through operational functions, particularly within Estates and Facilities, and managed in alignment with service delivery requirements and long-term estate planning. They are not currently tracked or assessed using consistent organisational risk frameworks.

Risks are identified through functional assessments and operational processes. This includes monitoring and managing energy use, maintaining environmental conditions for preservation, and implementing measures to address physical risks such as flooding. In 2024–25, The National Archives updated its flood mitigation planning, developed a climate change adaptation action plan, and baselined Scope 3 emissions to inform future procurement and estates decisions.

Where climate-related risks are identified as material or cross-cutting, they may be escalated through existing risk management processes (please see the governance statement from page 72 for a detailed overview). Strategic and operational risks, including climate-related risks as they emerge, are reviewed by the Audit and Risk Committee of the Board, which currently receives sustainability updates covering environmental performance and relevant risk factors (see page 87). During 2024–25,

climate-related issues such as greenhouse gas emissions, flood risk, and adaptation planning were raised through regular sustainability updates to the Committee.

The Executive Team receives updates on sustainability performance, including emissions and GGC targets. While climate-related risks are not yet considered as a standalone item at Board Committee level, we are taking steps to strengthen oversight. Work is planned during 2025–26 to improve the integration of climate-related risks into the wider risk management process, and to clarify ownership, formalise response processes and embed climate considerations more consistently into decision-making frameworks.

Data accuracy and metrics

As a non-ministerial department, The National Archives reports against the GGCs 2021-25 – a set of targets and outcomes that together help ensure that central government meets its vision for sustainability. These focus on Scope 1 (direct) and Scope 2 (indirect, own-use energy), and Scope 3 as far as it relates to business travel emissions, plus targets relating to consumption volumes for waste, water and paper. We updated our Scope 3 emissions baseline in 2024-25 to support future target setting and progress tracking. Progress against these targets is monitored quarterly by operational teams and reviewed by the Executive Team and Audit and Risk Committee. This year's performance is reported below.

We ensure data accuracy by using verified sources for quarterly and annual GGC reports, maintaining and expanding data quality beyond the minimum requirements. We update our sustainability dashboards regularly with current emissions and conversion factors, using invoice data where possible. These dashboards undergo verification to ensure accurate reporting.

In Autumn 2024, we reviewed sustainability drivers with internal stakeholders to develop an Environmental, Social, and Governance (ESG) strategy and action plan which will form the basis for initiatives in 2025-26.

Our performance contributes towards delivery of the UN Sustainable Development Goals (SDGs). We remain focused on the SDGs that closely align with our strategic sustainability objectives. This means we can have the greatest impact whilst simultaneously carrying out our statutory obligations. For 2025-26, we plan to communicate environmental goals via quarterly infographics shared across the organisation.

Performance against the Greening Government Commitments

Overall performance

Indicator	GGCs target 2021-25 against the baseline*	2024-25	Change compared to the baseline*	Change compared to 2023-24
Overall greenhouse gas emissions (tCO ₂ e)+	-58%	1,482	-46%	-8%
Direct greenhouse gas emissions (tCO ₂ e)**	-33%	487	-17%	-4%
Domestic flights emissions (tCO ₂ e)	-30%	4	-16%	-55%
Operational waste to landfill (%)	Less than 5%	0	0%	0%
Operational waste (%)	Reduce overall waste generated by 15%	46.6	-59%	8%
Recycling (%)	Increase recycling rate to at least 70% overall waste (bracketed figure is % recycled for that year)	47%	-8% change (51%)	36% change (34%)
Paper (A4e)	-50%	1,935	-44%	132%
Water (m³)	Reduce water consumption by at least 8%	14,196	-25%	-26%

- * Baseline year is 2017-18
- + Includes Direct energy, Indirect energy including transmission and distribution losses and all domestic travel.
- ** This includes only natural gas and fugitive refrigerant emissions.

Performance per full-time equivalent (FTE) employee

Indicator	2024-25	2024-25 per FTE employee^	2023-24	2023-24 per FTE employee^
Greenhouse gas emissions – within scope of GGCs+ international travel (tCO ₂ e)	1,562	2.71	1,675	2.96
Energy used (MWh)	6,984	12.13	7,605	13.43
Waste produced* (tonnes)	46.6	0.08	43.0	0.08
Water used (m³)	14,196	24.66	19,101	33.72
Domestic flights (t/CO ₂ e)	4	0.01	9	0.02
Domestic flights distance travelled (km)	15,007	26.07	33,513	59.17
Short-haul international flights distance travelled (km)	76,730	133.32	69,554	122.80
Long-haul international flights distance travelled (km)	250,654	435.51	178,634	315.37

- + Includes direct energy, indirect energy including transmission and distribution losses and official business travel.
- * Excludes one-off construction and refurbishment projects waste, to enable meaningful comparison.
- ^ Average FTE throughout the 2022-23 and 2023-24 reporting years.

The 2021-25 GGCs set more ambitious targets with an updated baseline year in order to build on past progress. As we had already implemented stricter targets before 2017, meeting the new goals presents additional challenges. While we have made good progress, especially in exceeding targets for waste reduction and water consumption, areas like travel and recycling still need improvement.

We did not fully meet the 58% emissions reduction target for 2021-25. In 2024-25, emissions were 1,482 tonnes of CO_2e , a 46% decrease from the baseline year and 8% lower than in 2023-24. This is still a significant reduction and an 81% decrease since 2010.

The target of a 33% reduction in direct emissions for 2021-25 is particularly challenging for The National Archives because natural gas is necessary to maintain the collection's required environmental conditions with our current infrastructure. We have therefore not met this target over the reporting period. Emissions

from gas had already dropped 61% since 2009-10, limiting further reductions without major upgrades and financial investment.

We did not meet the target for domestic flights emissions but have demonstrated an improvement of 55% compared to last year.

Although we achieved a 55% reduction in operational waste, we did not meet the target of recycling 70% of operational waste. Improved signage and training conducted in 2024-25 should improve this over the next year.

Greenhouse gas emissions

Greenhouse gas emissions

Indicator (tCO ₂ e)	2024- 25	2023- 24	2022-	2021-	2020- 21	Baseline 2017-18
Direct Energy (GHG Protocol Scope 1)	452	508	659	603	544	583
Indirect Energy (GHG Protocol Scope 2)	916	1,000	1,001	992	932	1,947
Indirect Energy including transport and distribution losses (GGCs Scope 2)	997	1,086	1,098	1,080	1, 012	2,129
Scope 3 – official business travel*	83	81	47	6	0.2	77

*Includes all business travel methods, domestic and international

Building energy consumption

Indicator (MWh)	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
Electricity: grid	4,425	4,828	5,176	4,671	3,998	5,537
Electricity: renewable	0	0	0	0	0	0
Electricity: good quality combined heat and power	72	175	108	3	90	87
Natural gas	2,472	2,777	3,613	3,284	2,941	3,165
Diesel oil	0	0	0	6.4	13.8	0

Financial indicators

Indicator (£)	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
Energy	1,455,511	1,612,779	1,263,146	885,795	738,254	753,022
Official business travel*	144,986	143,331	76,729	14,498	1,021	142,302

^{*} Includes all business travel methods, domestic and international.

The National Archives is committed to cutting emissions through infrastructure upgrades and promoting sustainable behaviour. Emissions from electricity have fallen 54% below the baseline, improving from 49% last year. We continue to explore energy audit recommendations from 2022-23 to reduce operational emissions, especially natural gas use. Options include isolating the CHP system, consolidating offices, and switching to electric boilers or heat pumps, pending budget approval.

In 2024-25, we improved building efficiency by introducing a LoRaWAN IoT network to monitor CO2, occupancy, temperature, and humidity across sites (see page 19). We enhanced the Building Management System by adding more sensors to optimise plant operations while maintaining environmental standards.

Heating, ventilation, and air conditioning (HVAC) operating hours were reduced by 66% for repositories, generating further energy savings while ensuring collection preservation.

Business travel remains a small part of emissions but has risen 32% since 2017-18, despite a 57% drop in domestic travel emissions. Increased participation in exhibits means travel emissions vary, but we plan to launch a sustainable travel policy in 2025-26 to encourage reductions.

Electricity emissions

Indicator	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
GHG Scope 2 (tCO ₂ e/MWh excluding Transmission and Distribution losses)	207	207	193	212	233	352
GGC Scope 2 (tCO ₂ e/MWh including Transmission and Distribution losses)	225	225	212	231	253	385

Grid decarbonisation and a 22% reduction in electricity use since the baseline have driven a 54% drop in electricity-related emissions.

Waste minimisation and management

Operational waste

Indicator (tonnes)	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
Total	47	43	54	68	21	113
Recycled and reused	22	15	31	47	11	58
Energy from waste incineration	20	24	21	20	8	49
Food and catering: anaerobic digestion	5	4	2	1	2	6
Composted	0	0	0	0	0	0
Landfill	0	0	0	0	0	0

Construction and refurbishment projects waste

Indicator (tonnes)	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
Total	58	0	9	3	30	12
Recycled and reused	53	0	9	3	29	6
Landfill	5	0	0	0	1	6

Operational waste expenditure

Indicator (£)*	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
Total**	24,786	24,530	25,856	23,409	14,559	24,520
Recycled and reused	5,292	6,910	10,244	9.842	4,225	6,066
Energy from waste incineration	6,035	5,527	5,337	5,650	2,692	9,324
Food and catering: anaerobic digestion	1,229	957	681	443	247	1,830
Landfill	0	0	0	0	0	0

^{*} Spend data obtained from our Facilities Management contract provider. Total includes the cost of storage and containment.

In 2024-25, we produced 47 tonnes of waste, representing a 59% reduction and exceeding the 15% target. 20 tonnes of operational waste went to energy recovery incineration

^{**}Includes compactor rental.

and none went to landfill. Recycling rose to 47% from 34% last year. Monthly operational waste fell to 3.9 tonnes from the baseline figure of 9.4 tonnes.

In March 2025, an on site composting unit was installed to process 5,000kg of food waste. This will eliminate food waste collection and related transport next year. Compost is used locally and efforts to reduce food waste continue.

One-off projects and exhibitions generated 58 tonnes of waste, and we aim to better understand and reduce this next year.

New signage and bins at our Kew site have improved recycling for staff and visitors. We are also working to eliminate consumer single-use plastics (CSUP). A 2024 audit found 289,300 CSUP items consumed in 2023-24, with usage assumed stable in 2024-25.

Finite resource consumption

Indicator	2024- 25	2023- 24	2022- 23	2021- 22	2020- 21	Baseline 2017-18
Water consumption (m³)	14,196	19,101	13,632	12,272	15,468	18,915
Water supply costs (£)	23,664	38,447	33,313	34,439	35,740	36,915
Paper use (reams A4e)	1,935	833	545	815	20	3,471

The National Archives exceeded the 8% water reduction target from the baseline year, with a 25% decrease in water use. Paper consumption dropped 44% from the baseline

as a result of our digitisation programme as well as general trends towards the elimination of excessive paper use. It fell short of the 50% target partly due to a bulk paper purchase.

Sustainable procurement

Sustainability is integrated into procurement using the Social Value Model and government tools. We are awaiting the review of the GGC Sustainable Procurement commitment in accordance with the Procurement Act 2023 to update our procurement strategy, which will also be influenced by the developing sustainability strategy.

Biodiversity and nature recovery

The Kew site supports diverse wildlife and green spaces that benefit local ecosystems and community wellbeing. Measures to protect biodiversity continue, including monitoring resident wildfowl with the Swan Sanctuary. A formal Nature Recovery Plan is not deemed necessary since we do not hold significant natural capital or landholdings as part of our core mission.

Climate change adaptation

In 2021-22 we conducted a high-level Climate Risk Assessment; we have also commissioned a Flood Risk Assessment for our site. During 2024-25 we worked toward further understanding our climate associated risks which is being incorporated into our developing Climate Change Adaptation Action Plan (in line with TCFD and GGC requirements). During 2025-26, we plan to build on our

prior activities by conducting a more detailed climate risk assessment to inform the development of the action plan.

ICT and digital sustainability

Efforts are ongoing to adopt the Greening Government ICT and Digital Services Strategy.

Sustainable construction

Site construction at Kew is limited to internal fabric development and life cycle replacement programmes. These works are undertaken with key sustainable milestones at the fore. Our ongoing window replacement project aims for 19% energy savings. A decarbonisation study was carried out in the summer of 2024 which informs our medium- and long-term sustainability goals. Recycling and the use of sustainable materials remain central to our activities.

Community engagement

We expanded community access with additional Sunday openings and public events and maintained our grounds and ornamental ponds as a local amenity for our staff, visitors and local residents to enjoy. We partner with Maids of Honour in our canteen, a small business local to Richmond who bake at their main campus. This allows us to provide food and refreshments at our public restaurant with minimal food miles, while also supporting the local economy.

In partnership with Equans, our Facilities Management partner, we hosted a Climate Day Fresk, the purpose of

which is to raise awareness and increase engagement in climate issues. Plans for 2025-26 include launching a wildlife and biodiversity trail around the grounds, providing an engaging and educational experience for young audiences.

Local partnerships

The Archives regularly hosts and supports groups such as Kew Society, Q2 Players Local Dramatic Society and Kew Riverside Park Residents, fostering strong local community ties. We host the Swedish School in London and Laidlaw Education, which between them host approximately 150 students. We have also ensured our embedded learning spaces can be utilised by the education team as part of our on site engagement with schools and the local community.

Progress in relation to Sustainable Development Goals

SDG	Progress in 2024-25	Focus for 2025-26
SDG 3. Good Health and Wellbeing	Continued progress related to our methodology for measuring health and wellbeing.	Finalise implementing new methodology for measuring health and wellbeing as part of ESG Action Plan.
	Annual assessment of focus areas within the building to support optimum environmental conditions in staff and public areas.	
	Changed practice of dealing with the digitisation of mould-affected records to support safer work environment.	

SDG 8.
Decent
Work and
Economic
Growth

Continued to apply the requirements of the Social Value Act and the Modern Slavery Act into all procurement, systems, and processes.

Conducted analysis of workspaces to improve hybrid working capabilities and workspaces.

Update sustainable procurement processes to reflect anticipated GGC review in line with the UK Procurement Act 2023 which came into force February 2025.

Staff on Facilities and Security Services contracts will, as a minimum, be aligned with London living wage from September 2025.

SDG 11. Sustainable Cities and Communities

Maintained climate and energy outreach with stakeholders.

Delivered Climate Fresk to increase awareness and engagement with environmental issues. Deliver an annual Climate Fresk following success in 2024-25.

Expand climate and energy outreach with stakeholders in line with our strategy and policies.

SDG 12. Responsible Consumption and Production

Continued focus to further reduce total waste, exceeding GGC target.

Conducted a waste audit to identify further waste reduction opportunities and improved recycling rates.

Conducted an in-depth audit of CSUP across our activities, with recommendations for improving performance.

Installed a composting unit on site to support reduction of food waste.

Update sustainable procurement processes to reflect anticipated GGC review and the UK Procurement Act.

Engage with catering to eliminate the use of CSUP where possible.

Educational focus with the aim of behavioural change on reduced consumption and proper recycling across the site.

SDG 13. Climate Action

Engaged with our staff regarding climate and sustainability, educated through a committee/focus group and the sustainability intranet page.

Held events such as 'Focus On' staff session about sustainability, education on climate change and impacts.

Educated staff about individual actions such as commuting and working from home.

Continued focus on energy efficiency actions across property and equipment.

Began roll out of sector carbon literacy training.

Build on the analysis of our Scope 3 baseline, focussing reduction activities on our most material categories, such as Purchased Goods and Services. Further development of carbon resilience and transition planning.

Develop plans to engage staff and visitors to support decarbonisation.

Carbon literacy training to be delivered for our senior management team as well as continued roll out across the organisation.

SDG 15. Life on Land

Continued to utilise our Kew site to educate local people on biodiversity.

The launch of a wildlife trial around the grounds to support the engagement and education of a young audience on biodiversity, plants and wildlife.

2.0 Accountability report

2.1 Corporate governance report

The Corporate governance report explains the composition and organisation of The National Archives' governance structures and how they support the achievement of our objectives.

Directors' report

About The National Archives

The National Archives is a non-ministerial department sponsored by the Department for Culture, Media and Sport (DCMS). Our main statutory duties are set out in the Public Records Act 1958 and associated legislation, and we fulfil the remit of the Public Record Office, the Historical Manuscripts Commission, His Majesty's Stationery Office, King's Printer of Acts of Parliament, Government Printer for Northern Ireland, and King's Printer for Scotland. Further details of our remit are summarised from page 11.

Management and structure

During the year under review, we reorganised some directorate portfolios. With the departure of the Chief Operating Officer, his responsibilities were distributed to

the Research and Commercial Development Director, the Digital Director and the new Interim Finance Director.

Our duties were carried out by the following directorates and functions.

Directorate/ Function	Director	Responsibilities
Chief Executive	Dr Jeff James CBE, Chief Executive (until 28 July 2024) Saul Nassé, Chief Executive (from 29 July 2024)	Our future direction and current performance, and is accountable to ministers for both. As Keeper of Public Records and Historical Manuscripts Commissioner, he holds the offices of King's Printer of Acts of Parliament (responsible for publishing all UK legislation and the official newspapers of record, The Gazette); King's Printer for Scotland and Controller of His Majesty's Stationery Office; and the office of Government Printer for Northern Ireland.
Chief Operating Officer	Neil Curtis, Chief Operating Officer (until 05 January 2025)	Ensuring The National Archives has all the resources (human and financial) it needs to deliver its agreed business priorities, via our business-critical functions across the organisation, including finance, corporate and strategic planning, security, IT operations and estates, delivering an effective and efficient foundation from which the organisation can achieve its strategic goals.
Digital	John Sheridan, Digital Director	Our digital services, enabling us to fulfil our ambition to become a digital archive by instinct and design. To provide strategic direction, transform our digital offer, and to shape and drive forward our cataloguing and web-based services. Holds the role of Chief Information Security Officer.

Directorate/ Function	Director	Responsibilities
People, Inclusion and Change	Andrea Metcalf, Director for People, Inclusion and Change	Our human resources and commitment to further strengthen our culture and approach so that we continually strive to better reflect and represent the society we serve. Our People strategy, building an organisational culture, delivering the new ways of working programme and building a more representative workforce.
Public Engagement and Sector Leadership	Emmajane Avery, Director of Public Engagement and Sector Leadership	Our public engagement strategic direction, and developing on site, online and remote learning and engagement programmes for the public and wider educational audiences. Our active support for the archive sector to secure the best possible long-term future for their collections and services.
Public Records Access and Government Services	Lucy Fletcher, Director for Public Records Access and Government Services	Our delivery of access services to the public and offer to government, providing expert advice and guidance to government departments and public bodies; driving strategic compliance with statutory obligations, including the transition to the 20-year rule; enhancing our approach to information rights; and enabling the growth of digital capability for the future preservation of born-digital government records.
Research and Commercial Development	Gemma Maclagan Ram, Research and Commercial Development Director	Our research, academic engagement, grants and funding activities as well as our conservation and heritage science. Our commercial teams and growing and diversifying our commercial products and services, delivering value for money, and embedding an entrepreneurial culture and ethos. Our business-critical functions, including IT operations and estates and facilities.

Directorate/ Function	Director	Responsibilities
Finance	Marie Twomey- McLeod,	Our finance (including planning and analysis), performance and risk teams.
	Interim Finance Director (from 06 January to 28 February 2025)	
	Peter Mills, Interim Finance Director (from 01 March 2025)	

Together the Directors make up the Executive Team. Further details about the Executive Team can be found on page 82. Further information about the organisation and directorate functions can be found on our website at: nationalarchives.gov.uk/about/our-role/transparency/our-staff.

The National Archives' Board

The National Archives' Board is the key strategic advisory body of the organisation. It consists of the Chief Executive and six Executive Directors, as well as the Chair of the Board and the four Non-executive Board members, who are:

Professor Andrew Wathey CBE

Chair of The National Archives' Board

Nigel Baker Non-executive Board member (From 01 January 2025)

Sonia Cargan

Non-executive Board member

Lopa Patel, MBE Non-executive Board Member (From 01 January 2025)

Rommel Pereira

Non-executive Board member, Chair of the Audit and Risk Committee

Mark Richards Non-executive Board member, Chair of the Finance and Performance Committee

(Until 30 December 2024)

Baroness (Ros) Scott of Needham Market Non-executive Board member (Until 30 December 2024)

Further details relating to the National Archives' Board can be found on page 73 and on our website at nationalarchives.gov.uk/about/our-role/executive-team/ and nationalarchives.gov.uk/about/our-role/management-board/.

Audit

The financial statements have been audited by the National Audit Office on behalf of the Comptroller and Auditor General (C&AG). The audit fee was £95,000 (see note 3 to the accounts on page 187). The National Audit Office did not provide any non-audit services during the year.

As far as the Accounting Officer is aware, there is no relevant audit information of which the National Audit Office is unaware. The Accounting Officer has taken all steps necessary to keep themselves informed of any relevant audit information and to establish that the entity's auditors are notified of that information.

Public sector information

The National Archives has complied with the cost allocation and charging requirements set out by HM Treasury. We are one of the public sector bodies now brought fully within the scope of the Re-use of Public Sector Information Regulations 2015 and we have taken steps to ensure that we comply with those Regulations, including publishing a statement of our public task.¹³

Governance statement

The Governance statement describes the framework of controls at The National Archives, including the assurances on the operation of the control framework, plus the processes for identifying and managing risk.

The Transparency page on our website incorporates a series of documents and policies that govern how we operate and take decisions, as well as the procedures followed to ensure that our actions are fair, efficient, transparent and accountable to our stakeholders.¹⁴

¹³ national archives.gov.uk/about/our-role/what-we-do/

^{14 &}lt;u>nationalarchives.gov.uk/about/our-role/transparency/</u>

The National Archives' Board

The National Archives' Board is the main governance body of our organisation. The Board concentrates on strategic issues affecting the organisation, as well as financial scrutiny and the oversight of major policies and performance. Meetings are chaired by the Chair of The National Archives' Board and the Head of Governance acts as the Board Secretary. The Head of Strategy and Chief Executive's Office also attends meetings.

Supporting and informing the work of the Board are its three sub-committees, the Audit and Risk Committee, the Nominations and Governance Committee and the Finance and Performance Committee.

The National Archives' Board is responsible for:

- Agreeing and taking forward the strategic aims and objectives of The National Archives, as agreed with ministers and within the resources framework agreed with HM Treasury.
- Ensuring that it is kept informed of any changes that are likely to impact on the strategic direction of The National Archives or on the attainability of its targets; advising on the steps needed to deal with such changes and where appropriate bringing such matters to the attention of the responsible Minister directly or via the Executive Team or The National Archives' sponsorship team at the Department for Culture, Media and Sport.

- Providing scrutiny, advice, support and challenge to the organisation, including supporting The National Archives and the Chief Executive in fulfilling his statutory responsibilities and other duties.
- Demonstrating high standards of corporate governance at all times, including by using the Audit and Risk Committee to help the Board address key financial and other risks; ensuring that adequate governance, audit and control systems are in place to meet statutory and administrative requirements, including that The National Archives operates within its statutory authority and delegated authority given by HM Treasury, in accordance with any other conditions relating to the use of public funds; and that, in its deliberations, the Board takes into account guidance issued by DCMS.
- Ensuring that it receives and reviews, usually via the Finance and Performance Committee, regular financial information concerning the management of The National Archives; is informed in a timely manner about any concerns about the activities of The National Archives; and provides positive assurance, via the Chair, to DCMS that appropriate action has been taken on such concerns.
- Through the Chair, ensuring that senior officials (the relevant Directors General or the Permanent Secretary) at DCMS are informed of any concerns about the management and direction of The National Archives.

The role of Board members is to:

- Provide scrutiny, advice, challenge and support to the Chief Executive and Executive Directors to support The National Archives' senior leadership team.
- Ensure The National Archives is setting a clear strategic direction across government, in all policy areas in which it is the lead department.
- Strive to improve how The National Archives delivers its strategic aims and objectives and how effectively it meets new strategic challenges as they emerge.
- Provide consistently strong and effective oversight of and support to the Chief Executive and the Executive Directors in delivering The National Archives' strategic aims and objectives.
- Promote effective and transparent challenge through open debate on Board matters, wherever necessary, to achieve the best decisions and outcomes.
- Actively encourage new and innovative ways of thinking at Board level, and across the organisation, including on the best use of new technology.
- Ensure that the right strategies and policies are in place to encourage and inspire the entire workforce to contribute to the organisation's overall aims, reflecting the Civil Service's core values.

- Comply at all times with the Code of Conduct for Board Members of Public Bodies,¹⁵ and with the rules relating to the use of public funds and conflicts of interest.
- Demonstrate adherence to the 12 Principles of Governance for all Public Body Non-executive Directors as appropriate.
- Not misuse information gained in the course of their public service for personal gain or for political profit, nor seek to use the opportunity of public service to promote their private interests or those of connected persons or organisations.
- Comply with The National Archives' rules on handling conflicts of interest and on the acceptance of gifts and hospitality, and of business appointments.
- Act in good faith and in the best interests of The National Archives. Uphold the values of the organisation as well as those expressed in the Seven Principles of Public Life.¹⁶
- Ensure they are familiar with any applicable guidance on the role of public sector non-executive directors and Boards that may be issued from time to time by the Cabinet Office, HM Treasury or wider government.
- Ensure the right information and evidence is available to make decisions, measure performance and provide assurance.

¹⁵ gov.uk/government/publications/code-of-conduct-for-board-members-of-public-bodies

¹⁶ gov.uk/government/publications/the-7-principles-of-public-life

Board performance

Since 2024, formal Board meetings have been held quarterly, along with additional development sessions and a strategy day. During the reporting year ordinary meetings took place in June, September and November 2024 and February 2025. An extraordinary meeting was held in July 2024. The Board also took part in an awayday in October 2024 and two special sessions on the Strategy Review and Spending Review in September 2024 and January 2025. In addition, the Chair reviewed our Zero-based Spending Review submission.

The Board works collectively and has a rolling agenda. Fixed agenda items include quarterly financial reporting, quarterly business and performance reporting, bi-annual corporate risk register review, annual staff survey results and its resulting action plan, plus review and approval of the Annual report and accounts. The Board receives regular reports from the Executive Team on its activities, as well as updates from the Chairs of the Audit and Risk Committee and the Finance and Performance Committee on the sub-committees' work, including assurance around risk management, governance and internal control.

The Board also reviews and endorses budget and strategic priorities, as well as scrutinising major procurement and policy decisions affecting our future strategic direction.

During the reporting year, the Board spent significant time on the Strategy Review and Spending Review. Other items considered included:

- strategic development and endorsement of a vision for Research.
- oversight and scrutiny on the delivery of the Public Connection 2022-2030 strategy.
- oversight and scrutiny of the implementation of the strategic international plan.
- oversight and scrutiny of the delivery of the commercial strategy.
- oversight and scrutiny on the development of the Government's new strategic vision for the archive sector.
- update on compliance with the Public Records Act and oversight and scrutiny of our offer to government to support this.
- oversight and scrutiny on refreshing the collection policy.
- oversight and scrutiny on accessioning Inquiry records, including pressures and resourcing.
- oversight and scrutiny of the Parliamentary Archives Project.
- oversight and scrutiny of the Northeast Partnership Project, including endorsing the Strategic Outline Case.
- oversight and scrutiny of the development of the strategic workforce plan.
- oversight and scrutiny of the Cybersecurity Assurance Programme.

- oversight and scrutiny of the business performance of the Grants and Funding Office.
- oversight of our relationship with the National Archives Trust.

Minutes of Board meetings are available on our website: nationalarchives.gov.uk/about/our-role/management-board/meeting-summaries/

All Board members also meet formally and informally with other senior managers and may be members of specific high-profile project and programme boards, as required. We have an active group of Non-executive Board members who also engage closely with the business to give strong assurance and governance.

The Board is content that the data with which it is provided is adequate, timely and comprehensive, and there are robust arrangements for reviewing and checking data.

Register of Board interests

Since April 2022, we have adopted a Conflicts of interest policy which sets out our approach to handling actual, potential and perceived conflicts of interest to maintain the integrity and impartiality of our decision-makers.¹⁷ All Board members are required to declare all personal or business interests and these are published in the Register of Interests on the website.¹⁸ At the beginning of each

^{17 &}lt;u>nationalarchives.gov.uk/about/our-role/transparency/governance/conflicts-of-interest</u>

^{18 &}lt;u>nationalarchives.gov.uk/about/our-role/transparency/governance/register-of-interests</u>

corporate governance meeting, all members are asked to declare any new and existing interests in relation to the agenda. These are noted in the minutes and where the matter is deemed to constitute a conflict, the member is asked to remove themselves from discussion of the item. In 2024-25, there were no declared conflicts of interest that resulted in a Board member recusing themselves from discussion. For further details on related party transactions, see page 213.

The Board engaged no special advisers in the financial year 2024-25.

Board effectiveness

The induction of new Board members includes interviews with key managerial staff about strategic issues and the remit and services of The National Archives, as well as providing briefing material on its governance framework and strategic plans.

The Board undertakes an annual assessment of its own effectiveness, which informs an action plan to improve effectiveness. The action plan is reviewed bi-annually for progress. The Board last undertook an external review of its effectiveness in May 2023, which noted the governance of the board was working well and effective, its members were skilled, and there were good processes in place for the escalation of risks. The resulting action plan included the creation of a new sub-committee and changes in the cycle of meeting.

This year's annual assessment was based on a selfevaluation questionnaire which concluded that the Board remained high performing. With changes only recently introduced to improve effectiveness, senior leadership turnover and a strategy review and spending review underway, the Board agreed to allow a full cycle of business to run and have a fallow year with regards adopting an action plan.

With recent new Non-executive Board member appointments, the Board welcomes greater digital expertise to support the organisation in delivering its ambitions, particularly in relation to cyber security and the AI revolution.

Challenge on performance of the Board is provided by the Non-executive Board members and other Board members. In this, the Board is informed by the findings of the board effectiveness review and its resulting action plan.

Non-executive Board members have annual appraisals with the Chair and Chief Executive, to monitor their performance and to identify training and development needs. The appraisal of the Chair is undertaken by the Directors General at DCMS. The Chief Executive and other Executive Directors are expected to feed into the process.

Diversity on the Board has improved with appointments made in recent years.

The Executive Team

The Executive Team is the decision-making body of the organisation. It consists of the Chief Executive and six Executive Directors. The Head of Strategy and Chief Executive's Office and/or a deputy also attend Executive Team meetings and the Head of Governance, or their nominee, provides secretariat support. The Executive Team usually meet fortnightly to:

- fulfil The National Archives' statutory responsibilities and deliver its strategic and business priorities.
- drive and manage improvements in business and financial performance.
- drive innovation, transparency and efficiencies that support delivery of strategic objectives and give value for money.
- identify high-level risks, ensuring their effective mitigation and business continuity.
- review and agree corporate policies.
- direct and support managers to deliver key investments and major projects.
- lead strategic staff management and resourcing.

Supporting and informing the work of the Executive Team is the Estates Strategy Committee and the Performance Executive Committee.

The Estates Strategy Committee was set up in 2022 to provide assurance that the organisation is managing its sites and assets appropriately and effectively, ensuring that all estates development activity aligns to and furthers our strategic plans, brand and cultural change initiatives. The Committee identifies interfaces across projects and manages competing demands and priorities for space. Its main focus during the reporting year was future document storage requirements, commercial development opportunities, large scale estates development projects and sustainability.

The Performance Executive Committee was set up in 2023 to operationally support the Executive Team in relation to financial and performance matters, ensuring the organisation conforms to relevant standards, principles, codes and statutory frameworks, enforcing strong disciplines on major projects, and championing the use of data to support corporate performance management. Following a review by the Executive Team, the Performance Executive Committee was disbanded in April 2025. Its responsibilities have been taken on by the Executive Team.

The business of the Executive Team is managed in a way that is inclusive, regularly inviting business updates from the staff members responsible for delivery. The Executive Directors are responsible for cascading summaries of Executive Team business to the rest of the organisation. Minutes of Executive Team meetings are available on our

website: <u>nationalarchives.gov.uk/about/our-role/executive-team/meeting-summaries</u>.

Staff are encouraged to bring issues to the Executive Team's attention through informal challenge. In addition, Directors regularly attend all-staff 'question and answer' sessions called 'Catch up with the Executive Team'. All members of staff are invited to attend and may ask any question about the running of the organisation or current concerns. Questions may be submitted anonymously in order to encourage openness.

The Audit and Risk Committee

The Audit and Risk Committee is a sub-committee of The National Archives' Board and supports the Accounting Officer and Board members in their responsibilities for issues of risk, internal control and governance, and associated assurance by:

- reviewing the effectiveness of the assurance framework in meeting the Board's and Accounting Officer's assurance needs.
- reviewing the reliability and integrity of these assurances.
- providing an opinion on how well The National Archives' Board and the Accounting Officer are supported in decision-taking and in discharging their accountability obligations, particularly in respect of Financial Reporting.

Membership comprises the Chair of the Audit and Risk Committee, an additional Non-executive Board member, and an appointed independent member, Alison White. Additional Non-executive Board members may be coopted when needed. Other attendees at each meeting
are the Chief Executive, the Interim Finance Director,
Digital Director, Director of Research and Commercial
Development, representatives from our external auditors
at the National Audit Office, representatives from our
Internal Auditors and the Head of Governance. Secretariat
support is provided by the Corporate Performance
Manager, with oversight from the Head of Governance.

The Committee usually meets four times a year. During 2024-2025 it met in June, October and December 2024, and February 2025. There was an extraordinary meeting held in July 2024 to receive the Audit Completion Report and to recommend the Annual report and accounts 2023-24 to The National Archives' Board.

Internal audit services were provided by Forvis Mazars during 2024-25. Proposed areas for internal audit focus are informed by discussions with the Committee and the Executive Team, together with the internal auditors' understanding of our control environment, the Corporate Risk Register and results of previous work performed. Reports from the internal auditors are copied to Committee members as soon as they are finalised. The Committee monitors the implementation of recommendations made by internal auditors, taking reports and evidence of progress as a standing agenda item. Executive Directors may be called to appear before the Committee to account for any issue arising from internal audit reports.

The internal auditors also conduct an annual review to follow up their recommendations which provides further independent assurance to the Committee. For the reporting year, the internal audit annual opinion was that The National Archives was 'moderate' in its adequacy and effectiveness.

The Committee maintains a list of risk assurance agenda items which are reported to each meeting in order to structure its agenda. The list encompasses a number of regular updates during the year. This year these included:

- Progress on the implementation of recommendations from internal audit reviews: The Committee received assurance that management was taking appropriate action to fully implement internal audit recommendations or had provided business justification if implementation deadlines (which are set by the owner as part of their management response to each recommendation) were not met.
- Fraud risk assessment: The Committee took a risk-based approach to potential fraud within the organisation and was pleased to note the findings from the annual risk assessment, which concluded that there was generally a good level of fraud awareness within The National Archives' culture, and adherence to the UK Government Functional Standard GovS 013: Counter Fraud.
- Security (including information assurance, cyber security risks, and data handling) and business continuity: The Committee received bi-annual updates

on key developments in relation to The National Archives' physical security, business continuity, and data handling, and was pleased to note that there had been no significant breaches of security. As a key source of assurance, The National Archives' performance against HM Government's Minimum-Security Standards was assessed via the annual Departmental Security Health Check return to the Cabinet Office which assesses compliance within the four security practices: Governance, Physical, Personnel, and Response. The National Archives achieved 100% compliance in Governance, Physical and Response. Compliance with Personnel Standard is not currently being met. This is due to the Personnel Standard being newly published in 2024. Plans are in place to improve compliance with the new Personnel Standard during 2025-26.

- Health and safety: The Committee gained assurance that the building remained a safe and accessible working environment for staff, visitors, and contractors. Importantly, the Committee gained regular assurance that appropriate measures and resources were in place to help support the positive mental health and wellbeing of The National Archives' staff.
- Environment and sustainability: Bi-annual progress updates around environmental and sustainability issues provided the Committee with assurances that The National Archives remains committed to meeting targets outlined in the Greening Government Commitments 2021 to 2025 (GGC). Targets against total waste reduction,

zero to landfill, paper reduction, water consumption, and domestic business flight emissions are on track or have been exceeded. It was noted, however, that whilst progress has been made on targets against direct (Scope 1) emissions, further improvements are necessary to remain or get on track (see the environment and sustainability report on page 47).

- Human resources governance: The Committee
 oversaw and regularly reviewed current human resource
 risks within the organisation and took assurance that
 avenues for confidential reporting within The National
 Archives were understood and had been tested. The
 Committee was pleased to note that the Chair of the
 Audit and Risk Committee remained the external and
 independent whistleblowing escalation point.
- Safeguarding report: The Committee successfully oversaw the implementation of a continued programme of safeguarding measures and policies within the organisation, providing strong assurance that The National Archives is fulfilling its statutory responsibilities.
- Procurement report: Bi-annual updates gave the Committee oversight of any potential risks and opportunities associated with The National Archives' procurement and commercial activities.
- Risk management policy and risk appetite: The Committee received and reviewed risk appetite as part of the risk management framework.

- Cyber Security: The Committee received progress updates at each meeting on the organisation's Cyber Security Programme, the current contingencies in place, and opportunities to mitigate risks.
- Corporate risks: The Committee was pleased to note that all corporate risks were being actively managed by the Executive Team. Particular issues identified within the Corporate Risk Register, which continued to be key priorities for the Committee, included ongoing risks around Freedom of Information compliance, specifically in relation to the Ministry of Defence service personnel records, the risk to Government of The National Archives failing to capitalise on the digital information space, and potential risks around the successful delivery of the Parliamentary Archives service.
- Statement of Internal Control: The annual Statement of Internal Control (which replaced the previous Accountability Statements) provided annual assurance to the Committee that business-as-usual risks were being managed effectively throughout the organisation. This was completed at year-end by heads of departments, then reviewed by Directors before updates were provided to the Executive Team and the Committee.

In addition, the Committee received regular updates and progress reports on other issues of particular interest. This year, progress updates included assurance regarding:

• FOI Lessons Learned and Compliance Performance: In February 2025, the Committee received a summary of

the FOI lessons learned review, along with an overview of measures the FOI Team was taking to improve its overall FOI compliance performance.

- Assurance Map: The Committee received updates on work being undertaken to produce an assurance map, (as set out in the Orange Book), based on the three lines of defence risk model, providing an overview of sources of assurance at The National Archives.
- Workday Lessons Learned Review: In October 2024, the Committee reviewed findings from the lessons learned review of Workday, providing an overview of aspects of the project which had been successful, along with areas which could have been done differently.

The Committee received the results from its annual (internal) self-assessment survey in December 2024 and a separate survey carried out to review the internal and external audit services by, respectively, Forvis Mazars and the National Audit Office (NAO). Overall, it was agreed that the Audit and Risk Committee ran very effectively in 2024-25, with a high level of challenge and scrutiny and excellent oversight of risk management processes. Good practice benchmarking and learning from elsewhere, achieved through the Committee's Thought Leadership sessions and Deep Dive reviews, were particularly appreciated and well received as they increase the Committee's awareness and insights on current issues and topics.

Feedback indicating potential areas for improvement included a need for the internal audit planning process to

start earlier, to avoid a potential bottleneck of internal audit reviews taking place at year end, along with a proposal that the Committee carries out an annual review of how closely it is aligned to the government's Orange Book Management of Risk – Principles and Concepts.¹⁹

The Finance and Performance Committee

The Finance and Performance Committee has been established as a sub-committee of The National Archives' Board to support it in its responsibilities for:

- reviewing and monitoring progress and performance in achieving strategic objectives via in year business priorities.
- reviewing and monitoring regular financial performance information (actuals and forecast) in a timely manner.
- providing scrutiny, advice and challenge on major projects with a material financial impact.
- providing scrutiny, advice and challenge to ensure The National Archives maximises public value and meets user needs.

Membership comprises of three Non-executive Board members, including the Chair of the Audit and Risk Committee, the Chief Operating Officer, the Research and Commercial Development Director and the Director of People, Inclusion and Change. Following the departure of the Chief Operating Officer, the interim Finance Director

¹⁹ gov.uk/government/publications/orange-book

joined the Committee. Other attendees include the Head of Finance, (a position which was repositioned to Head of Financial Planning, Performance and Analysis in January 2025) and the Head of Governance. The chair is a Non-executive Board member (who is not the Chair of the Audit and Risk Committee). During the reporting year, meetings were chaired by Mark Richards until the end of his term with Andrew Wathey filling the role on an interim basis. Lopa Patel was appointed as the new chair from 1 April 2025. Secretariat support was provided by the PA to the Chief Operating Officer and the Governance Team, with oversight from the Head of Governance.

The Committee usually meets four times a year and met in April, September and November 2024 and February 2025. Its focus was on scrutinising monthly management accounts, quarterly forecasts and quarterly business priorities performance; scrutinising the budget for 2025-26; oversight of benefits realisation from the implementation of Workday (an enterprise resource planning system); scrutinising the savings and efficiencies scenarios to inform our Spending Review submission; and oversight of the commercial business development plan.

The Nominations and Governance Committee

The Nominations and Governance Committee is a key forum for discussion of leadership development and succession planning, and the decision-making body for the pay and bonuses of all our senior Civil Service staff, except for the Chief Executive.

The Nominations and Governance Committee meets a minimum of twice a year and ensures pay increases are in line with guidance provided by the Cabinet Office, which hears the outcome of the Review Body on Senior Salaries and sets the pay policy for senior salaries across the Civil Service. The Committee also ensures that there are satisfactory systems for identifying and developing staff with high potential. It is chaired by the Chair of The National Archives' Board and membership consists of all Non-executive Board members and the Chief Executive in an advisory capacity. The Director of People, Inclusion and Change provides secretariat support. The committee met three times in 2024-25, in June and September 2024 and January 2025.

The Corporate Governance Code

As a non-ministerial department, we adopt and adhere to Corporate governance in central government departments: Code of good practice²⁰ to the extent that it is practical, appropriate and compatible with our statutory or other authoritative requirements. We periodically review the Board's effectiveness and corporate governance arrangements to ensure that we are aligned with good practice elsewhere across government, taking into account our unique role and responsibilities and the statutory and non-statutory roles fulfilled by our senior officials. The current structure enables the Non-executive Board members to challenge the Chief Executive and Executive

²⁰ gov.uk/government/publications/corporate-governance-code-for-central-government-departments-2017

Team, to clearly position it as an advisory body, to shape the Board agenda and provide positive assurance to senior officials at DCMS, via the Chair of The National Archives' Board, on the management and direction of the organisation.

Attendance at Board meetings and Committees for the Chief Executive, Executive Directors and Non-executive Board members

The Chief Executive, Executive Directors, and Nonexecutive Board members attended the following numbers of Board and Committee meetings (for which they were eligible to attend) during the year:

Name	Role	Board	Audit and Risk Committee	Nominations and Governance Committee	Finance and Performance Committee
Dr Jeff James CBE (until 28 Jul 2024)	Chief Executive and Keeper	2 of 2	1 of 1	4 of 4	N/A
Saul Nassé (from 29 Jul 2024)	Chief Executive and Keeper	6 of 6	3 of 3	2 of 2	3 of 3
Neil Curtis (until 05 Jan 2025)	Chief Operating Officer	2 of 3	3 of 3	N/A	3 of 3
Emmajane Avery	Director of Public Engagement and Sector Leadership	8 of 8	N/A	N/A	N/A

Lucy Fletcher	Director for Public Records Access and Government Services	7 of 8	N/A	N/A	N/A
Gemma Maclagan Ram (joined the Audit and Risk Committee from 6 January 2025)	Director of Research and Commercial Development	8 of 8	1 of 1	N/A	4 of 4
Andrea Metcalf	Director of People, Inclusion and Change	7 of 8	N/A	3 of 3	4 of 4
Marie Twomey- McLeod (06 Jan – 28 Feb 25)	Interim Finance Director	2 of 2	1 of 1	N/A	1 of 1
Peter Mills (from 01 Mar 25)	Interim Finance Director	1 of 1	1 of 1	N/A	1 of 1
John Sheridan (joined the Audit and Risk Committee from 6 January 2025)	Digital Director	8 of 8	1 of 1	N/A	N/A
Andrew Wathey	Chair of the Board	8 of 8	N/A	3 of 3	4 of 4
Nigel Baker (from 1 Jan 2025)	Non-executive Board member	2 of 2	N/A	1 of 1	N/A

Non-executive Board member	8 of 8	N/A	3 of 3	N/A
Non-executive Board member	2 of 2	N/A	1 of 1	N/A
Non-executive Board member	8 of 8	4 of 4	3 of 3	4 of 4
Non-executive Board member	5 of 6	2 of 3	2 of 2	3 of 3
Non-executive Board member	6 of 6	N/A	2 of 2	N/A
Independent Member of the Audit and Risk Committee	N/A	4 of 4	N/A	N/A
	Board member Non-executive Board member Non-executive Board member Non-executive Board member Independent Member of the Audit and Risk	Non-executive Board member Independent N/A Member of the Audit and Risk	Non-executive Board member N/A A of 4 Independent N/A Member of the Audit and Risk	Non-executive Board member Non-executive Board member Non-executive Board member Non-executive Board member Sof 2 N/A

Functional Standards

All central government departments and their arm's length bodies are required to comply with 14 Functional Standards in a way that meets their business needs and priorities. For the financial year 2024-25, The National Archives fully met 9 of the 14 standards. We have assessed that two areas remain not applicable, as the scale of requirements are not proportionate to an organisation of our size: Analysis and Communication.

For Project Delivery, we partially met the standard. This is because we currently operate a devolved project delivery model where there are some known inconsistencies in approach. Further, some of our projects are at a relatively low level in terms of scale and risk, meaning that not all the standards are applicable in every case. To address the known inconsistencies, a 'best practice' programme is being developed and implemented in 2025-26.

In relation to Human Resources, the National Archives met all the mandatory elements except for Organisation Design and Development. Within this theme we are still developing workforce planning/supply and demand which will be shaped by the outcome of the operating model review.

In relation to Security, the National Archives was fully compliant with the Governance, and Physical and Response elements of the functional standard. However, the Personnel element of the standard was not met. Plans are in place to improve compliance with this standard in 2025-26.

Managing our risks

We proactively manage risk at all levels, promoting risk management as a tool to balance risk and innovation across the organisation.

In 2024-25, our risks were categorised as follows:

- Operational and policy delivery.
- Commercial.
- Financial and value for money.
- Reputational and credibility.
- Compliance: legal, regulatory and data.

We measure the degree of risk by considering both likelihood and impact. The Executive Team sets maximum 'residual risk' scores for each category, reflecting our risk appetite. The Board expects that risks across the organisation will be managed within these scores. If a risk exceeds its residual risk score, we take remedial action, where possible and cost-effective, to reduce either the likelihood or impact.

The Executive Team has identified a set of corporate risks linked to our business priorities, informed by internal developments, external influences, and long-term commitments. These risks, if not managed, could compromise our ability to provide statutory services or significantly diminish these services. Each corporate risk is owned by a member of the Executive Team and is regularly reviewed by the Executive Team and the Audit and Risk Committee, with bi-annual updates to the Board.

Our most significant risks in terms of residual risk scores are outlined as follows:

Operating as a National Archive with Financial Pressures

Risk: There is a risk that The National Archives faces ongoing budgetary pressures due to uncertainty over funding beyond 2025-26. This could impair our ability to deliver statutory obligations and strategic ambitions.

Controls: The 2025-26 budget set an affordable staff establishment for the organisation. We use a quarterly financial reforecasting process to reprioritise budgets

or planned activities as needed. We are developing a workforce plan to define the right sizing of teams and skills required to deliver our strategic ambitions. Additionally, we are identifying efficiencies and savings to manage budget pressures and have developed robust business cases to support additional spending.

Failure to Meet the Challenges of Digital

Risk: There is a risk that The National Archives fails to address the challenges of being a digital archive, such as not having suitably secure, scalable, flexible, resilient, and recoverable systems, or not moving quickly enough to respond to technological changes like AI.

Controls: We are planning to grow our digital capability and capacity, with a positive Spending Review settlement for 2025-26. The teams are prioritising carefully, focusing on cyber-security and public inquiries transfer. Additionally, we are aligning with cross-government reforms to elevate leadership and invest in talent under the new blueprint for modern digital government.

Staff Leadership and Culture

Risk: There is a risk that leadership and management do not provide the necessary direction, prioritisation, and support required to ensure an effective, productive, and engaged workforce.

Controls: Regular conversations at the Executive Team and Performance Executive Committee regarding prioritisation, including with Heads of Departments, provide

focus and direction. We maintain a continued focus on wellbeing and support for both managers and non-managers. Strategic workforce planning ensures that the direction of travel is clear regarding skills and capabilities for the future. The People, Inclusion and Change strategic plan underpins our efforts to minimise this risk.

Managing Relationship with The National Archives Trust

Risk: There is a risk that The National Archives does not develop and manage this strategic partnership effectively, leading to a decline in influence and failure to capitalise on the current strategic direction.

Controls: We have agreed funding to March 2026 to work through options for the future relationship with the Trust. Senior leaders are attending Board meetings to facilitate the working relationship. We are actively managing the partnership to ensure alignment and mutual benefit.

Access to MoD Service Personnel Records

Risk: There is a risk that, due to our inability to keep pace with the complexity and scale of demand, we are unable to provide timely access to MoD service personnel records through the FOI regime.

Controls: We have recruited additional roles on fixedterm contracts and secured project funding. A governance refresh is underway, and a Service Transformation Manager has been recruited. We are drafting a S.10(4) Order to extend compliance time and exploring cost recovery solutions.

Parliamentary Archives

Risk: In managing the complex strategic partnership with the two Houses and the Parliamentary Digital Service, there are risks that aspects of relocation are delayed, service expectations are not met, or The National Archives receives insufficient resources to manage the transition or deliver the Parliamentary Archives' services.

Controls: Workforce planning is underway to define viable resourcing. We are managing expectations regarding digital integration and working on a service for relocation.

Cyber-Attack

Risk: There is a risk that The National Archives is the victim of a successful cyber-attack, leading to loss of service provision, compromised data and lasting reputational damage.

Controls: Risk mitigation is a top priority, with regular progress reports made to the Chief Executive. The cyber security programme is delivering interventions across the organisation, focusing on immutable backups and recovery plans. We have completed a pilot of the Wiz cloud security monitoring service and are working on refactoring legacy on-premise systems.

Senior Team Turnover

Risk: Recent changes in senior leadership may lead to concerns about priorities and potential delays in decision-making.

Controls: A skills audit for the Board helped with the recruitment of new Non-executive Board Members. The strategy review process has involved senior leadership and staff to ensure input into focus and prioritisation.

Local Authority Archives Places of Deposit status

Risk: There is a financial and reputational risk should the viability and sustainability of local archives be further diminished. Responsibility for the management of the records could fall on The National Archives under its legislative and statutory responsibilities. This could create financial and operational challenges in storing, managing, or disposing of records, potentially necessitating legislative intervention.

Controls: We are actively communicating statutory responsibilities to local authorities and seeking legal counsel. Concurrently, we are developing targeted advocacy tools, engaging with local government archivists, and providing strategic leadership across the archive sector.

Risks below the corporate level are managed, reviewed and updated at least quarterly by Executive Directors and their management teams. Each directorate maintains a risk register that captures risks. Over time, most directorate risks are managed as 'business-as-usual'; exceptionally, they may be escalated to the corporate risk register. Operational risks are managed daily, with Executive Directors receiving assurance through six-monthly accountability statements from their direct reports.

At year-end, all Heads of Department are asked to submit a Statement of Internal Control, which are reviewed by the Executive Team and approved by the Chief Executive.

Authors of Statements of Internal Control assess the maturity of risk management in their areas and provide evidence for their assessment. They also ensure staff comply with key corporate policies, relevant laws, and regulations, including:

- Public sector equality duty.
- Managing Public Money.
- GDPR.
- FOI Act considerations.
- Public Records Act 1958.
- Civil Service Code.
- Fraud policy.
- Conflicts of interests' policy.
- Raising a concern.
- Anti-bribery policy.
- Procurement.
- Bullying and harassment.
- · Safeguarding.

We have recently completed an internal audit of risk management and have identified a need to review our risk

management policy and risk appetite. We will complete this work in 2025-26.

Health and safety

The Chief Executive recognises that ensuring the health and safety of staff and visitors is essential to the success of The National Archives. Our commitment to health and safety is genuine and consistent for all staff and visitors and is an integral part of the management of the organisation.

We monitor, record and investigate accidents and near miss incidents in order to prevent recurrence and work-related ill-health. We continue to meet our legal responsibilities under health and safety legislation, as a minimum, and to assess risks to anyone who could be affected by our activities. We put in place robust measures to control these risks.

We provide our staff with information, instruction, training and supervision. We ensure that resources are available to support workplace health and safety. Health and safety procedures are in place and responsibilities are appropriately assigned to ensure that the aims of our health and safety policy statement are met.

We are committed to delivering an inclusive, safe working environment whether staff are working on site, remotely, or a mixture of the two, ensuring safe working methods and providing safe work equipment. We monitor and review our safety arrangements and prevention measures to ensure they are both effective and encourage a culture of continuous improvement.

We consult on health, safety, and welfare matters with staff, the Health and Safety Committee, and their representatives, including trade unions. We promote a systematic and organised method of improving health and safety within departments with a robust programme of inspection and audit. Through training and communication, we further promote the exchange of information for staff and managers to adopt safe systems of work within departments.

Whistleblowing policy: 'Raising a concern'

Staff and contractors have access to our Whistleblowing policy, 'Raising a concern'. This provides access to the Chair of the Audit and Risk Committee or to the Chief Executive, who support the individual in raising their concerns. They can raise a concern either with a manager within the organisation to begin this process or with one of the nominated officers (the Head of Visitor Experience and the Head of Document Services).

We encourage awareness of the policy by reminding staff and contractors during the year, including the process for raising concerns. Since 2021, we have supported the Civil Service 'Speak Up' campaign and in November 2024, we promoted 'Speak Up' via our internal communications channels. We shared resources for line managers to support them in creating an environment where speaking up is encouraged. No concerns were raised under these policy arrangements during the financial year 2024-25.

Safeguarding

Ensuring the welfare and safety of our staff and visitors is a priority for The National Archives and safeguarding is considered to be the responsibility of everyone in the organisation. We have a well-developed Safeguarding Policy, which is implemented by a team of three Safeguarding Leads responsible for reporting all incidents to our local authority (Richmond). The team deliver mandatory safeguarding training to all members of staff when they join, with refresher training delivered online every two years. We have also appointed additional Safeguarding reporting officers across key areas of the organisation to act as access points for the reporting of incidents, ensuring there is always someone available to staff and members of the public. In addition, staff who regularly deliver public engagement activities, including our education, outreach, events, exhibitions and venues teams, plus relevant members of our collections expertise and engagement team, have enhanced Disclosure and Barring Service checks. We have a strict policy about working with children and adults at risk and operate a Safeguarding panel of representatives from across the organisation, which meets every six months to discuss any issues. Each year, the Safeguarding Lead provides a report to the Audit and Risk Committee on training, developments and any incidents.

Information risk

The management and mitigation of cyber and information security risk was a priority in 2024-25. We maintained our ISO 27001 certification for IT delivered services.

We undertook a recertification audit to the updated ISO 27001:2022 standard, conducted by a United Kingdom Accreditation Service-accredited certification body.

UK General Data Protection Regulation

There was one personal data-related incident reported to the Information Commissioner's Office during 2024-25, which occurred in April 2024. The Gazette contractor, a data processor acting on our behalf, did not action a court order to remove an address in a bankruptcy notice. We carried out an investigation and process changes have been made as a result. ICO have confirmed no further action will be taken.

Conclusion

As Accounting Officer, I have considered the evidence provided which formed the basis of the Annual Governance Statement along with the independent advice received from the Audit and Risk Committee. This evidence included assurance provided by the previous Chief Executive, Dr Jeff James CBE, who undertook the Accounting Officer role until 28 July 2024. I am assured and content with the effectiveness of the framework of governance, risk management and control systems in place outlined above.

Statement of Accounting Officer's responsibilities

Under the Government Resources and Accounts Act 2000, HM Treasury has directed The National Archives to

prepare, for each financial year, resource accounts detailing the resources acquired, held, or disposed of during the year and the use of resources by The National Archives during the year.

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

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

- observe the Accounts Direction issued by HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis.
- make judgments and estimates on a reasonable basis.
- state whether applicable accounting standards, as set out in the Government Financial Reporting Manual, have been followed, and disclose and explain any material departures in the accounts.
- confirm that the annual report and accounts as a whole are fair, balanced, and understandable, and personal responsibility for the annual report and accounts and the judgments required for determining that it is fair, balanced and understandable.
- prepare the accounts on the going concern basis.

HM Treasury have appointed me as the Accounting Officer of The National Archives, with responsibility for preparing The National Archives' accounts and for transmitting them to the Comptroller and Auditor General.

The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which an Accounting Officer is answerable, for keeping proper records and for safeguarding the department'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 National Archives' auditors are aware of that information. So far as I am aware, there is no relevant audit information of which the auditors are unaware.

The annual report and accounts as a whole are fair, balanced and understandable and I take personal responsibility for the annual report and accounts and the judgments required for determining that they are fair, balanced and understandable.

Sand Nami

Saul Nassé Accounting Officer 16 July 2025

2.2 Remuneration and staff report

Senior civil service grades

The remuneration of senior civil servants is set by the Prime Minister following independent advice from the Review Body on Senior Salaries. In reaching its recommendations, the Review Body has regard to the following considerations:

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

The Review Body takes account of the evidence it receives about wider economic considerations and the affordability of its recommendations. Further information about the work of the Review Body can be found on the Office for the Pay Review Bodies web pages on the UK Government website.²¹

Service contracts

Civil Service appointments are made in accordance with the Civil Service Commissioners' Recruitment Code. The Code requires appointments to be made on merit, on the basis of fair and open competition, as published in the Recruitment Principles published by the Civil Service Commission. These principles also define where there may be exceptions to this, and the rules governing these.

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

Further information about the work of the Civil Service Commission can be found on their website.²²

Dr Jeff James CBE's appointment as Chief Executive concluded on 28 July 2024. He was succeeded in role by Saul Nassé who was confirmed by DCMS from 29 July 2024 for a four-year term.

Rommel Pereira was appointed from 1 May 2021 on a three-year contract as Chair of the Audit and Risk Committee, which was extended for a further four-year term until 30 April 2028.

²¹ gov.uk/government/organisations/office-for-the-pay-review-bodies

²² civilservicecommission.independent.gov.uk

Professor Andrew Wathey CBE was appointed as Chair of The National Archives' Board from 1 April 2022 on a three-year contract, which was extended for a further five-year term until 31 March 2030.

Baroness (Ros) Scott of Needham Market and Mark Richards were appointed as Non-executive Board members from 21 May 2018 on three-year contracts, which were extended until 30 December 2024 at which point both left the organisation.

Sonia Cargan was appointed as a Non-executive Board member from 19 January 2021 on a three-year contract, which was extended for a further four-year term until 18 January 2028.

Alison White was appointed as an independent member of the Audit and Risk Committee from 8 August 2023 on a three-year contract.

Nigel Baker and Lopa Patel were appointed as Nonexecutive Board members from 1 January 2025 on fiveyear contracts.

Service contracts can be terminated under the standard procedures of the Civil Service Management Code.

The Nominations and Governance Committee

The policy on remuneration of senior civil servants, and the deliberations of the Nominations and Governance Committee, adhere to Cabinet Office policy, which follows the guidance and recommendations of the Review Body on Senior Salaries.

Salary and bonuses (unaudited)

Salary includes gross salary, overtime, reserved rights to London weighting or London allowances, recruitment and retention allowances, and any other allowance to the extent that it is subject to UK taxation. This report is based on accrued payments made by the department and thus recorded in these accounts. Percentage salary increases, and performance bonuses, are agreed by the Nominations and Governance Committee in accordance with strict guidance and parameters set each year by the Cabinet Office.

Senior staff have written objectives agreed with the Chief Executive. Performance against these objectives, and against The National Archives' values, forms the basis of their formal appraisal and subsequent pay and bonus recommendations. This information is used by the Nominations and Governance Committee to determine pay awards, according to the Review Body on Senior Salaries' annual recommendations.

The monetary value of benefits in kind covers any benefits provided by the department and treated by HM Revenue and Customs as a taxable emolument.

Bonuses are based on performance level attained and are made as part of the appraisal process. The stated figures disclose both in-year bonuses and end-of-year bonuses that relate to the preceding year. As such, reported bonuses in 2024-25 relate to performance in both 2024-

25 and 2023-24, with the comparative bonuses relating to performance in both 2023-24 and 2022-23.

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

Directors' remuneration (audited)

The salary, pension entitlements and the value of any taxable benefits in kind of the Chief Executive, Executive Directors and Non-executive Board members of The National Archives, were as follows: ²³ ²⁴

Director	2024-25 Salary and FYE (full- year, full-time equivalent) £000	2024-25 Bonus £000	2024-25 Benefit in kind £	2024-25 Pension benefits £000	2024-25 Total £000
Dr Jeff James CBE Chief Executive (until 28 July 2024 inclusive) ²⁵	55-60 (130-135)	-	-	-	55-60 (130-135)
Saul Nassé Chief Executive (from 29 July 2024)	110-115 (145-150)	-	-	41	150-155 (185-190)

²³ Salary and full-year equivalent (FYE) are presented to the nearest £1,000. FYE is shown in brackets. Benefits in kind are presented to the nearest £100, pension benefits and total remuneration to the nearest £1,000.

²⁴ The value of pension benefits accrued during the year is calculated as (the real increase in pension multiplied by 20) less (the contributions made by the individual). The real increases exclude increases due to inflation or any increase or decreases due to a transfer of pension rights.

²⁵ Dr Jeff James was not a member of the pension scheme during 2024-25 or 2023-24.

Director	2024-25 Salary and FYE (full- year, full-time equivalent) £000	2024-25 Bonus £000	2024-25 Benefit in kind £	2024-25 Pension benefits £000	2024-25 Total £000
Neil Curtis	95-100	10	-	33	135-140 (150-155)
Chief Operating Officer (until 05 January 2025 inclusive)	(115-120)				(130-133)
Marie Twomey-McLeod	10-15	-	-	7	15-20
Interim Finance Director (from 06 January 2025 until 28 February 2025 inclusive) ²⁶	(85-90)				(90-95)
Peter Mills	10-15	-	-	5	15-20
Interim Finance Director (from 01 March 2025) ²⁷	(105-110)				(110-115)
Emmajane Avery Director of Public Engagement and Sector Leadership	95-100	-	-	66	160-165
Lucy Fletcher Public Access and Government Services Director	95-100	-	-	38	135-140
John Sheridan Digital Director	95-100	5	-	57	160-165

²⁶ Marie Twomey-McLeod was Interim Finance Director for a period of only 2 months, between Neil Curtis leaving the organisation and Peter Mills joining. The salary reported here relates only to the period that she was in role as Interim Finance Director, while the pension figure relates to the full year.

²⁷ Peter Mills joined The National Archives on 10 February 2025 ahead of taking over as Finance Director on Marie Twomey-McLeod's exit. He joined as 0.8FTE and as such receives only 0.8 of the FYE salary disclosed here.

Director	2024-25	2024-25	2024-25	2024-25	2024-25
	Salary and	Bonus	Benefit	Pension	Total
	FYE (full- year, full-time equivalent)	£000	in kind £	benefits £000	£000
	£000				
Gemma Maclagan Ram Research and Commercial Development Director	100-105	-	-	40	140-145
Andrea Metcalf Director of People, Inclusion and Change	95-100	-	-	38	135-140
Professor Andrew Wathey CBE Chair of The National Archives Board	20-25	N/A	-	N/A	20-25
Sonia Cargan Non-executive Board member	10-15	N/A	-	N/A	10-15
Rommel Pereira Non-executive Board member	15-20	N/A	-	N/A	15-20
Mark Richards Non-executive Board member (until 30 December 2024)	10-15 (10-15)	N/A	-	N/A	10-15 (10-15)
Baroness (Ros) Scott of Needham Market Non-executive Board member (until 30 December 2024)	5-10 (10-15)	N/A	-	N/A	5-10 (10-15)

Director	2024-25	2024-25	2024-25	2024-25	2024-25
	Salary and	Bonus	Benefit	Pension	Total
	FYE (full- year, full-time	£000	in kind	benefits	£000
	equivalent)		£	£000	2000
	£000				
Alison White	0-5	N/A	-	N/A	0-5
Independent member of the Audit and Risk Committee (from 08 August 2023)					
Lopa Patel	0-5	N/A	-	N/A	0-5
Non-executive Board member (from 01 January 2025)	(10-15)				(10-15)
Nigel Baker	0-5	N/A	-	N/A	0-5
Non-executive Board member (from 01 January 2025)	(10-15)				(10-15)
Director	2023-24 Salary and FYE	2023-24 Bonus	2023-24 Benefit in kind	2023-24 Pension benefits	2023-24 Total
	(full-year, full-time equivalent) £000	£000	£	£000	£000
Dr Jeff James CBE	130-135	_	-	-	130-135
Chief Executive (until 28 July 2024 inclusive)					
Saul Nassé	N/A	N/A	N/A	N/A	N/A
Chief Executive (from 29 July 2024)					

Director	2023-24 Salary and FYE (full-year, full-time equivalent) £000	2023-24 Bonus £000	2023-24 Benefit in kind £	2023-24 Pension benefits £000	2023-24 Total £000
Neil Curtis Chief Operating Officer (until 05 January 2025 inclusive)	115-120	-	-	46	160-165
Marie Twomey-McLeod Interim Finance Director (from 06 January 2025 until 28 February 2025 inclusive)	N/A	N/A	N/A	N/A	N/A
Peter Mills Interim Finance Director (from 01 March 2025)	N/A	N/A	N/A	N/A	N/A
Emmajane Avery Director of Public Engagement and Sector Leadership	90-95	-	-	51	140-145
Lucy Fletcher Public Access and Government Services Director	90-95	-	-	37	130-135
John Sheridan Digital Director	90-95	-	-	54	145-150
Gemma Maclagan Ram Research and Commercial Development Director	90-95	-	-	37	130-135

Director	2023-24 Salary and FYE (full-year, full-time equivalent) £000	2023-24 Bonus £000	2023-24 Benefit in kind £	2023-24 Pension benefits £000	2023-24 Total £000
Andrea Metcalf Director of People, Inclusion and Change	90-95	-	-	36	125-130
Professor Andrew Wathey CBE Chair of The National Archives Board	15-20	N/A	-	N/A	15-20
Sonia Cargan Non-executive Board member	10-15	N/A	-	N/A	10-15
Rommel Pereira Non-executive Board member	15-20	N/A	-	N/A	15-20
Mark Richards Non-executive Board member (until 30 December 2024)	10-15	N/A	-	N/A	10-15
Baroness (Ros) Scott of Needham Market Non-executive Board member (until 30 December 2024)	10-15	N/A	-	N/A	10-15
Alison White Independent member of the Audit and Risk Committee (from 8 August 2023)	0-5 (0-5)	N/A	-	N/A	0-5 (0-5)

Director	2023-24 Salary and FYE (full-year, full-time equivalent) £000	2023-24 Bonus £000	2023-24 Benefit in kind £	2023-24 Pension benefits £000	2023-24 Total £000
Lopa Patel	N/A	N/A	N/A	N/A	N/A
Non-executive Board member (from 01 January 2025)					
Nigel Baker	N/A	N/A	N/A	N/A	N/A
Non-executive Board member (from 01 January 2025)					

Pay multiples (audited)

2024-25	25th percentile pay ratio	Median pay ratio	75th percentile pay ratio
Band of highest paid Director's remuneration (£)	£145,000- £150,000	£145,000- £150,000	£145,000- £150,000
Employee total remuneration (£)	£28,529	£38,172	£50,098
Staff salary and allowances (£)	£26,824	£38,172	£50,098
Ratio	5.17	3.86	2.94
2023-24	25th percentile pay ratio	Median pay ratio	75th percentile pay ratio
Band of highest paid Director's remuneration (£)	•		•
Band of highest paid Director's	pay ratio £130,000-	£130,000-	pay ratio £130,000-
Band of highest paid Director's remuneration (£) Employee total	pay ratio £130,000- £135,000	£130,000- £135,000	£130,000- £135,000

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid Director in their organisation and the lower quartile, median and upper quartile remuneration of the organisation's workforce.

The banded remuneration of the highest-paid Executive Director at The National Archives in the financial year 2024-

25 was £145-£150,000 (2023-24: £130-£135,000). This was 3.86 times (2023-24: 3.63) the median remuneration of the workforce, which was £38,172 (2023-24: £34,943). The small increase in median renumeration for the workforce is due entirely to the in-year pay award, which is in line with the pay, reward and progression policies at The National Archives. The change in salary for the highest-paid Director represents an 11% increase from the previous year, caused by the new Chief Executive being appointed on a salary at market rate. This accounts for the increase in ratio between their salary and the median remuneration of the workforce.

In both 2024-25 and 2023-24, no employees received remuneration in excess of the highest-paid Director. Remuneration ranged from £25,612 to £145-150,000 (2023-24: £23,460 to £130-135,000). The average salary and allowance for all employees was £40,264, a 2.1% increase on the previous year. The average bonus payable for all employees was £319, an 8% increase on the previous year.

Total remuneration includes salary, non-consolidated performance-related pay and benefits in kind (travel and subsistence). It does not include severance payments, employer pension contributions and the cash equivalent transfer of pensions.

Pension benefits (audited)

Director	age as at 31/03/25 and related	Real increase in pension and related lump sum at pension age £000 in bands of £2,500	Cash Equivalent Transfer Values (CETV) at 31/03/25 ²⁸ £000 to nearest £000	Cash Equivalent Transfer Values (CETV) at 31/03/24 £000 to nearest £000	Real increase in Cash Equivalent Transfer Values (CETV) £000 to nearest £000
Saul Nassé Chief Executive (from 29 July 2024)	0-5	0-2.5	39	0	32
Neil Curtis Chief Operating Officer (until 05 January 2025 inclusive)	20-25	0-2.5	332	282	21
Marie Twomey- McLeod Interim Finance Director (from 06 January 2025 until 28 February 2025 inclusive)	20-25	0-2.5	277	267	4
Peter Mills Interim Finance Director (from 01 March 2025)	5-10	0-2.5	103	97	5

²⁸ CETV figures are calculated using the guidance on discount rates for calculating unfunded public service pension contribution rates that was extant at 31 March 2025.

Emmajane Avery Director of Public Engagement and Sector Leadership	30-35	2.5-5	638	558	52
Lucy Fletcher Public Access and Government Services Director	20-25	0–2.5	310	262	20
Gemma Maclagan Ram Research and Commercial Development Director	15-20	0-2.5	196	154	22
Andrea Metcalf Director of People, Inclusion and Change	5-10	0-2.5	120	78	27
John Sheridan Digital Director	35-40	2.5-5	696	621	44

There were no employer contributions to partnership pension accounts in respect of any of the above.

Civil Service pensions

Pension benefits are provided through the Civil Service pension arrangements. Before 1 April 2015, the only scheme was the Principal Civil Service Pension Scheme (PCSPS), which is divided into a few different sections – classic, premium, and classic plus provide benefits on

a final salary basis, whilst nuvos provides benefits on a career average basis. From 1 April 2015, a new pension scheme for civil servants was introduced – the Civil Servants and Others Pension Scheme or alpha, which provides benefits on a career average basis with a normal pension age equal to the member's State Pension Age (or 65 if higher). From that date, all newly appointed civil servants and the majority of those already in service joined alpha.

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

In alpha, pension builds up at a rate of 2.32% of pensionable earnings each year, and the total amount accrued is adjusted annually in line with a rate set by HM Treasury. Members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004. All members who switched to alpha from the PCSPS had their PCSPS benefits 'banked', with those with earlier benefits in one of the final salary sections of the PCSPS having those benefits based on their final salary when they leave alpha.

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

When the Government introduced new public service pension schemes in 2015, there were transitional arrangements which treated existing members differently based on their age. Older members of the PSCPS remained in that scheme, rather than moving to alpha. In 2018, the Court of Appeal found that the transitional arrangements in the public service pension schemes unlawfully discriminated against younger members (the "McCloud" judgment). As a result, steps are being taken to remedy those 2015 reforms, making the pension scheme provisions fair to all members. The Public Service Pensions Remedy is made up of two parts. The first part closed the PCSPS on 31 March 2022, with all active members becoming members of alpha from 1 April 2022. The second part removes the age discrimination for the remedy period, between 1 April 2015 and 31 March 2022, by moving the

membership of eligible members during this period back into the PCSPS on 1 October 2023.

The accrued pension benefits, Cash Equivalent Transfer Value and single total figure of remuneration reported for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the PCSPS for the period between 1 April 2015 and 31 March 2022, following the McCloud judgment. The Public Service Pensions Remedy applied to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled into the PCSPS for the remedy period and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the alpha scheme for the period from 1 April 2015 to 31 March 2022.

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

pensionable salary to cover the cost of centrally provided risk benefit cover (death in service and ill health retirement).

Further details about the Civil Service pension arrangements can be found at <u>civilservicepensionscheme.org.uk</u>.

Cash Equivalent Transfer Values (CETV)

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

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

benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

Real increase in CETV

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

Staff report

Ensuring that the organisation has the right people, with the rights skills, at the right time, enables us to achieve our ambitions and regulatory/statutory responsibilities and is a critical aspect of our people activities. In 2024-25 we developed a strategic workforce capability plan, identifying the potential skills and capabilities we will need for the future. This will be fine-tuned post completion of our strategy review and the outcome of the Government's Spending Review.

During the year a priority for the People, Inclusion and Change Directorate was supporting the recruitment and onboarding of MoD Access Team colleagues. This recruitment happened in bulk and at pace and we successfully recruited 35 people for the team, mostly within a 3-month period. Between July and September 2024, the number of hires across the whole organisation

was 27, which increased to 58 between October and December 2024.

We have continued to develop the use of our Enterprise Resource Planning system, Workday, which has now been in place for 18 months. During 2024, the annual performance review process was completed via Workday for the first time. This allowed us to track and report on progress and completion rates, meaning support to staff and managers could be targeted as needed. Workday is also now used for recruitment, meaning that recruiting managers can access candidate applications directly and shortlist more easily.

We have seen a small increase in many of the themes within the Civil Service Staff Survey. Our engagement score has increased to 68% from 67% last year and we remain within the top quartile of the Civil Service for engagement. We use our rolling staff engagement action plan to aid accountability for acting on the themes coming out of the survey.

Pay remains one of the main areas of dissatisfaction amongst staff. As a result, we are undertaking a review of our approach to pay and benefits. We have run focus groups, including with the unions and senior leadership to better understand the issues as well as undertaking a benchmarking exercise.

Diversity, equity and inclusion (DEI)

As a public sector organisation, we are committed to equal opportunities for all as part of our duty under the Equality

Act 2010 and the Public Sector Equality Duty: Guidance for public authorities. Our dedication to becoming a more diverse, inclusive and equitable organisation is underpinned by Archives for Everyone. Part of the Public Sector Equality Duty involves fostering good relations between persons who share a relevant protected characteristic and persons who do not share it, including among staff. The policies we have in place guard against discrimination, and we work hard to make The National Archives a safe and supportive environment for staff and visitors alike. We have completed a policy overview to ensure that all our policies are people focused, consistent and transparent, and work continues to ensure they remain relevant and accessible.

We remain a Disability Confident Level 2 employer and are committed to ensuring that there is no discrimination on the grounds of disability. We continue to look at ways to increase our knowledge and understanding of disability rights for our people in the workplace. We have grown our reach and connections within cross government civil service networks, including the Socio-Economic Diversity Network, the Workplace Adjustment Network and the Race Equality and Celebrating Heritage Network (REACH) which is coordinated from the Ministry of Housing, Communities and Local Government. In February 2025, REACH collaborated with one of our record specialists to host a talk to introduce the audience to researching for Black British history at The National Archives. The talk provided an overview of what the organisation holds, including some key and iconic records such as the John Blanke payslip and the Windrush passenger lists.

We continue to prioritise an intersectional approach to engaging and empowering colleagues across the organisation through our staff networks. The internal DEI Forum and the Intersectional Support Network continue to support our strategic focus on progressive change, greater workforce representation and finding ways to gather meaningful data and evidence to inform the organisation's next DEI steps. The latter continues to be explored through initiatives such as a data access and use project.

Workforce breakdown

Workforce	31 March 2025	31 March 2024
Staff numbers (headcount)	626	582
Workforce diversity:		
Ethnic minorities ²⁹	14.9%	18.2%
Women – director level	4 of 7	4 of 7
Women – overall	51.6%	51.5%
Disabled ³⁰	8.5%	8.9%
Temporary appointments – average per month ³¹	21.3	17
Staff turnover ³²	18.0%	15.8%
Staff sickness absence (days per FTE)	6.75	7.4

²⁹ Percentage of employees declaring an ethnicity.

³⁰ Percentage of employees declaring a disability.

³¹ Temporary appointments are employees appointed under Exception 1 of the <u>Civil Service Recruitment Principles</u>.

³² This figure includes both voluntary turnover and involuntary turnover, such as the ending of fixed-term contracts.

Staff engagement (Civil Service staff engagement survey score %)	68	67
Consultancy expenditure (£000)	159	61

Average full-time equivalent number of persons employed (audited)

The average number of full-time equivalent persons employed during the year was as follows:

Area of activity	2024-25 Permanently employed staff	2024-25 Other staff ³³	2024-25 Total	2023-24 Total
Government information management	99	16	115	115
Preservation and protection	86	11	97	95
Public access	342	22	364	351
Staff engaged on capital projects	7	-	7	8
Total	534	49	583	569

^{33 &#}x27;Other staff' includes staff on fixed-term contracts.

Senior Civil Service (SCS) by band as at 31 March 2025

Salary band	(number	2023-24 (number of SCS)
£80,000 - £90,000	1	-
£90,000 - £100,000	5	5
£100,000 - £110,000	1	-
£110,000 - £120,000	-	1
£120,000 - £130,000	-	-
£130,000 - £140,000	-	1
£140,000 - £150,000	1	_
Total	8	7

Staff costs (audited)

Staff costs	2024-25	2024-25	2024-25	2023-24	
	Permanently	Other staff	Total	Total	
	employed staff	Starr	£000	£000	
	£000	£000			
Wages and salaries	24,794	456	25,250	24,902	
Social security costs ³⁴	2,695	-	2,695	2,533	
Other pension costs	6,681	-	6,681	6,016	
Sub total	34,170	456	34,626	33,451	

^{34 2024-25} includes £103,000 apprenticeship levy cost (2023-24: £105,000). The Apprenticeship Levy was introduced in April 2017, requiring employers with a pay bill of more than £3 million pounds each year to pay the levy.

Less staff costs capitalised on IT projects	(1,388)	-	(1,388)	(759)
Total net costs	32,782	456	33,238	32,692

Off-payroll engagements

Review of tax arrangements of public sector appointees

Table 1: Temporary off-payroll worker engagements as at 31 March 2025

Number of existing engagements as of 31 March 2025 Of which:	8
Number that have existed for less than one year at time of reporting	7
Number that have existed for between one and two years at time of reporting	0
Number that have existed for between two and three years at time of reporting	1
Number that have existed for between three and four years at time of reporting	0
Number that have existed for four or more years at time of reporting	0

Table 2: All temporary off-payroll workers engaged at any point during the year ended 31 March 2025

ended 31 March 2025	9			
Of which:				
Numbers determined as in-scope of IR35	7			
Numbers determined as out-of-scope of IR35	2			
Number of engagements reassessed for compliance or assurance purposes during the year	0			
Of which: Number of engagements that saw a change to IR35 status following the consistency review	0			
Number of engagements where the status was disputed under provisions in the off-payroll legislation	0			
Of which: Number of engagements that saw a change to IR35 status following the review				
Table 3: For any off-payroll engagements of Board members, and/or senior officials with significant				
financial responsibility, between 1 April 2024 and 3 March 2025	31			
•	31			
March 2025 Off-payroll engagements of Board members and/or senior officials with significant financial responsibility between 1	0			

Staff pension arrangements

The Principal Civil Service Pension Scheme (PCSPS) is an unfunded multi-employer defined benefit scheme in which The National Archives is unable to identify its share of the underlying assets and liabilities. A full actuarial valuation was carried out as at 31 March 2020.³⁵

For 2024-25, employers' contributions of £6.6 million were payable in Accruing Superannuation Liability Charges (2023-24: £5.9 million) at a rate of 28.97% of pensionable earnings (2023-24: a range of 4 rates between 26.6% and 30.3%, based on salary bands). The Scheme Actuary reviews employer contributions usually every four years following a full scheme valuation. The contribution rates are set to meet the cost of the benefits accruing during 2024-25 to be paid when the member retires and not the benefits paid during this period to existing pensioners.

Employees can opt to open a partnership pension account, a stakeholder pension with an employer contribution. Employers' contributions of £0.09 million (2023-24: £0.09 million) were paid to the appointed stakeholder pension provider, Legal & General. Employer contributions are age-related and range from 8% to 14.75% of pensionable earnings.

Employers also match employee contributions up to 3% of pensionable earnings. In addition, employer contributions of £0.003 million (2023-24: £0.003 million), 0.5% of

³⁵ Details of the scheme valuation can be found at <u>civilservicepensionscheme.org</u>. uk/about-us/scheme-valuations/

pensionable pay were payable to the PCSPS to cover the cost of the future provision of lump sum benefits on death in service or ill health retirement of these employees.

Contributions due to the partnership pension provider at the balance sheet date were £0.008 million (2023-24: £0.008 million). Contributions prepaid at that date were nil (2023-24: nil).

Reporting of Civil Service and other compensation schemes – exit packages (audited)

Details of the compensation scheme payments, and the number of departures during the year, and the previous year, are shown in the table below. Compensation agreed for departures did not exceed the Cabinet Office's recommended cap of £95,000.

Exit package cost band £000	2024-25 Compulsory redundancies	2024-25 Other departures	2024-25 Total	2023-24 Compulsory redundancies	2023-24 Other departures	2023-24 Total
< £10	-	-	-	1	_	1
£10 - £25	-	_	-	-	-	-
£25 - £50	-	-	-	-	-	-
£50 - £100	-	1	1	-	-	-
Total number of exit packages	-	1	1	1	-	1
Total costs £000	£-	£57	£57	£9	£-	£9

Redundancy and other departure costs have been paid in accordance with the provisions of the Civil Service Compensation Scheme; a statutory scheme made under the Superannuation Act 1972. Exit costs are accounted for in full in the year of departure.

Where the department has agreed early retirements, the additional costs are met by the department and not by the Civil Service pension scheme. Ill health retirement costs are met by the pension scheme and are not included in the table.

Business Appointment Rules

The Business Appointment Rules (BARs) apply to civil servants (including Special Advisers) leaving Crown Service. In compliance with Business Appointment rules, we are transparent in the advice given to individual applications for senior staff, including special advisers. Advice regarding specific business appointments has been published on GOV.UK.36 We inform all leavers that they must obtain agreement before accepting a post outside the Civil Service if their official duties in the two years before leaving Crown service (or earlier if the association has been of a continued or repeated nature) resulted in personal involvement with the prospective employer, or they had access to commercially sensitive information of their competitors. If either of the above applies, we ask staff to contact us for advice. During the 2024-25 financial year, there were three exits from the Civil Service as Director

³⁶ gov.uk/government/publications/business-appointment-rules-for-crown-servants/business-appointment-rules-for-crown-servants

and SCS. No Business Appointment applications were received. We did not receive any disclosures relating to BARs and we were not aware of any breaches.

The Trade Union (Facility Time Publication Requirements) Regulations 2017 (Statutory Instrument 328) report

Relevant union officials

Number of employees who were relevant union officials during the relevant period	Full-time equivalent employee number
17	16.05

Percentage of time spent on facility time

Percentage of time	Number of employees
0%	12
1-50%	5
51%-99%	0
100%	0

Percentage of pay bill spent on facility time

Pay bill spent on facility time	2024-25
Total cost of facility time	£5,091.96
Total pay bill	£33,237,622
Total	0.02%
Paid trade union activities	
Percentage of total paid facility time	2024-25
Total	0%

2.3 Parliamentary accountability and audit report

Statement of Outturn against Parliamentary Supply (SoPS) (audited)

In addition to the primary statements prepared under the International Financial Reporting Standards (IFRS), the Government Financial Reporting Manual 2024-25 (FReM) requires The National Archives to prepare a Statement of Outturn against Parliamentary Supply (SoPS) and supporting notes.

The SoPS and related notes are subject to audit, as detailed in the Certificate and Report of the Comptroller and Auditor General to the House of Commons.

The SoPS is a key accountability statement that shows, in detail, how an entity has spent against their Supply Estimate. Supply is the monetary provision (for resource and capital purposes) and cash (drawn primarily from the Consolidated Fund), that Parliament gives statutory authority for entities to utilise. The Estimate details supply and is voted on by Parliament at the start of the financial year.

Should an entity exceed the limits set by their Supply Estimate, called control limits, their accounts will receive a qualified opinion.

The format of the SoPS mirrors the Supply Estimates, published on GOV.UK, to enable comparability between what Parliament approves and the final outturn.

The SoPS contain a summary table, detailing performance against the control limits that Parliament have voted on, cash spent (budgets are compiled on an accruals basis and so outturn will not exactly reconcile to cash spent) and administration.

The supporting notes detail the following: Outturn by Estimate line, providing a more detailed breakdown (note 1); a reconciliation of outturn to net operating expenditure in the Statement of Comprehensive Net Expenditure (SoCNE), to tie the SoPS to the financial statements (note 2); and a reconciliation of outturn to net cash requirement (note 3).

The SoPS and Estimates are compiled against the budgeting framework, which is similar to the IFRS. An understanding of the budgeting framework and an explanation of key terms is provided on page 34, in the Performance analysis section of the Performance Report. Further information on the Public Spending Framework and the reasons why budgeting rules are different to IFRS can also be found in Chapter 1 of the Consolidated Budgeting Guidance, available on gov.uk.³⁷

The SoPS provides a detailed view of financial performance, in a form that is voted on and recognised by Parliament. The Performance analysis section of the

³⁷ gov.uk/government/publications/consolidated-budgeting-guidance-2024-to-2025

Performance Report provides a summarised discussion of outturn against estimate and functions as an introduction to the SoPS disclosures.

Summary table 2024-25, all figures presented in £000s

Type of	SoPS		(Outturn		E:	stimate	Outturn	Prior year
spend	note	Voted	Non- voted	Total	Voted	Non- voted	Total	Estimate: Savings/ (Excess)	Outturn total 2023-24
Departmental Expenditure Limit									
Resource	1.1	46,975	-	46,975	48,250	-	48,250	1,275	48,697
Capital	1.2	7,417	-	7,417	7,743	-	7,743	326	3,283
Total		54,392	-	54,392	55,993	-	55,993	1,601	51,980
Annually Man	aged E	xpenditu	ıre						
Resource	1.1	4	-	4	38	-	38	34	(24)
Total		4	-	4	38	-	38	34	(24)
Total Budget									
Resource	1.1	46,979	-	46,979	48,288	-	48,288	1,309	48,673
Capital	1.2	7,417	-	7,417	7,743	-	7,743	326	3,283
Total Expenditure		54,396	-	54,396	56,031	-	56,031	1,635	51,956

Figures in the Estimate column cover the voted control limits voted by Parliament. Refer to the Supply Estimates guidance manual, available on GOV.UK, for detail on the control limits voted by Parliament.

Net Cash requirement 2024-25, all figures presented in £000s

Item	SoPS note	Outturn	Estimate	Outturn vs Estimate, Saving / (Excess)	Prior Year Outturn Total 2023-24
Net Cash requirement	3	48,094	49,373	1,279	42,171

Administration costs 2024-25, all figures presented in £000s

Type of spend	SoPS note	Outturn	Estimate	Outturn vs Estimate, Saving / (Excess)	Prior Year Outturn Total 2023-24
Administration costs	1.1	11,584	12,652	1,068	12,757

Although not a separate voted limit, any breach of the administration budget will also result in an excess vote.

Notes to the Statement of Outturn against Parliamentary Supply 2024-25

SoPS1. Outturn detail by Estimate Line

SoPS1.1 Analysis of Net Resource Outturn by Estimate line, all figures presented in £000s

Spend Type		Resource Outturn Estimate							Outturn	Prior	
(Resource)		Adminis	stration		Prog	_j ramme	Total	Total	vs Estimate: Saving/	Year Outturn Total	
	Gross	Income	Net	Gross	Income	Net			(Excess)	2023-24	
Spending in Departmental Expenditure Limits (DEL)											
Voted expenditure	11,615	(31)	11,584	56,305	(20,914)	35,391	46,975	48,250	1,275	48,697	
Spending in	Spending in Annually Managed Expenditure (AME)										
Voted expenditure	-	-	-	4	-	4	4	38	34	(24)	
Total Resource	11,615	(31)	11,584	56,309	(20,914)	35,395	46,979	48,288	1,309	48,673	

The Outturn was lower than the Estimate by £1.3 million. This is due firstly to an underspend in ring-fenced depreciation of £0.5 million, largely driven by some assets under development (mostly project ETNA, the redevelopment of The National Archives' website) not being complete at year end and so not yet depreciable. The remaining £0.8 million is due to additional income generated towards the end of the financial year.

SoPS1.2 Analysis of Capital Outturn, all figures presented in £000s

Spend Type (Capital)			Outturn	Estimate	Outturn	Prior Year Outturn Total 2023-24			
	Gross	Income	Total	Total	vs Estimate: Saving/ (Excess) Total				
Spending in Depart	Spending in Departmental Expenditure Limit (DEL)								
Voted expenditure	7,561	(144)	7,417	7,743	326	3,283			
Total Capital	7,561	(144)	7,417	7,743	326	3,283			

No virements have been made by The National Archives. Virements are the reallocation of provisions in the Estimates that do not require Parliamentary authority (because Parliament does not vote to that level of detail and delegates to HM Treasury).³⁸

³⁸ gov.uk/government/publications/supply-estimates-guidance-manual

SoPS2. Reconciliation of Outturn to Net Operating Expenditure, all figures presented in £000s

Item	Reference	Outturn total	Prior Year Outturn Total 2023-24
Total Resource Outturn	SoPS1.1	46,979	48,673
Depreciation charged to Other Comprehensive Net Expenditure		(4)	(3)
Net Operating Expenditure in Consolidated Statement of Comprehensive Net Expenditure	SoCNE	46,975	48,670

As noted in the introduction to the SoPS above, the Outturn and the Estimate are compiled against the budgeting framework, which is similar to the IFRS. Accordingly, the above table reconciles the Total Resource Outturn to Net Operating Expenditure, linking the SoPS to the financial statements.

The reconciling item in both 2024-25 and 2023-24 relates to depreciation on donated assets, charged directly to Other Comprehensive Net Expenditure.

SoPS3. Reconciliation of Net Resource Outturn to Net Cash Requirement, all figures presented in £000s

Item	SoPS note	Outturn total	Estimate	Outturn vs Estimate, Saving/ (Excess)
Total Resource Outturn	SoPS 1.1	46,979	48,288	1,309
Total Capital Outturn	SoPS 1.2	7,417	7,743	326
Adjustments to remove non-cash items:				
Depreciation, amortisation and impairment		(8,272)	(8,143)	129
Depreciation on donated assets		(4)	(2)	2
Loss on Disposal		(22)	-	22
Right of Use Asset - Interest charge		66	-	(66)
Right of Use Asset - Remeasurement		(161)	-	161
New provisions and adjustments to previous provisions		-	(38)	(38)
Other non-cash items		(95)	-	95
Adjustments to reflect movements in working balances:				
Decrease in inventories		(12)	-	12
Increase in receivables		1,217	-	(1,217)
Decrease in payables		375	1,525	1,150
Decrease in contract liabilities		12	-	(12)
Right of Use Asset – Lease repayment		594	-	(594)
Net Cash Requirement		48,094	49,373	1,279

As noted in the introduction to the SoPS above, the Outturn and the Estimate are compiled against the budgeting framework, not on a cash basis. Therefore, this table

reconciles the Total Resource and Capital Outturn to the Net Cash Requirement.

Parliamentary Accountability Disclosures (audited)

Fees and charges

There were no material fees and charges throughout the year that require disclosure (2023-24: nil).

Losses and special payments

A constructive loss of £610k was incurred during 2024-25 (2023-24: nil).

The loss relates to an impairment of intangible assets under development, whereby two components of the Omega project have been written off as they will not be developed further and/or brought into use. For more details, see note 6 to the Accounts on page 196.

Remote contingent liabilities

In addition to contingent liabilities within the meaning of International Accounting Standard (IAS) 37, The National Archives also reports liabilities for which the likelihood of a transfer of economic benefit in settlement is too remote to meet the definition of contingent liability. In the year 2024-25, there were no remote contingent liabilities to report (2023-24: nil).

Sand Nami

Saul Nassé Accounting Officer 16 July 2025

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

Opinion on financial statements

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

The financial statements comprise The National Archives':

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

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

In my opinion, the financial statements:

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

Opinion on regularity

In my opinion, in all material respects:

- the Statement of Outturn against Parliamentary Supply properly presents the outturn against voted Parliamentary control totals for the year ended 31 March 2025 and shows that those totals have not been exceeded; and
- 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 (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 National Archives 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 National Archives' 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 National Archives ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

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

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

Other information

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

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

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

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

I have nothing to report in this regard.

Opinion on other matters

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

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

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

Matters on which I report by exception

In the light of the knowledge and understanding of The National Archives and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Report.

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 National Archives or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations
 I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or

- certain disclosures of remuneration specified by HM
 Treasury's Government Financial Reporting Manual
 have not been made or parts of the Remuneration and
 Staff Report to be audited is not in agreement with the
 accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the 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 National Archives 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, in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000; and
- assessing The National Archives' ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by The National Archives will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

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

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate,

they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

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

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

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

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

- considered the nature of the sector, control environment and operational performance including the design of The National Archives' accounting policies.
- inquired of management, The National Archives' internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to The National Archives' 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 National Archives' controls relating to its compliance with the Government Resources and Accounts Act 2000, Managing Public Money, and the Public Records Act 1958.
- inquired of management, The National Archives' 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 National Archives for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions and bias in management estimates. 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 National Archives' framework of authority and other legal and regulatory frameworks in which The National Archives 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 National Archives. The key laws and regulations I considered in this context included Government Resources and Accounts Act 2000, Managing Public Money, Supply and Appropriation (Main Estimates) Act 2024 and relevant employment law and tax legislation.

Audit response to identified risk

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

- I reviewed the financial statement disclosures and tested 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 and 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;
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential

bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business; and

 I addressed the risk of fraud in revenue recognition, assessing the recognition of licencing and royalty income in line with the accounting framework.

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 appropriate evidence sufficient to give reasonable assurance that the Statement of Outturn against Parliamentary Supply properly presents the outturn against voted Parliamentary control totals and that those totals have not been exceeded. The voted Parliamentary control totals are Departmental Expenditure Limits (Resource and Capital), Annually Managed Expenditure (Resource and Capital), Non-Budget (Resource) and Net Cash Requirement.

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
16 July 2025
Comptroller and Auditor General

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

3.0 Financial statements

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

	Note	2024-25 £000	2023-24 £000
Revenue from contracts with customers	4	(16,820)	(13,216)
Other operating income	4	(4,125)	(2,008)
Total operating income		(20,945)	(15,224)
Staff costs	3	33,238	32,692
Purchase of goods and services	3	26,227	23,686
Depreciation, impairment, provisions and audit charges	3	8,367	7,447
Loss on Disposal	6	22	-
Right of Use Asset interest charge	7	66	69
Total operating expenditure		67,920	63,894
Net operating expenditure		46,975	48,670
Other comprehensive net expenditure			
Items which will not be reclassified to net operating expenditure:			
- Net (gain)/loss on revaluation of property, plant and equipment	5	3,041	6,235
- Net (gain)/loss on revaluation of intangible assets	6	(982)	(134)
- Receipt of and depreciation of donated assets		(140)	3
Comprehensive net expenditure for the year		48,894	54,774

Statement of Financial Position as at 31 March 2025

		31 Ma	erch 2025 £000	31 Ma	March 2024 £000	
Non-current assets:						
Property, plant and equipment	5	164,543		163,485		
Intangible assets	6	36,608		35,910		
Right-of-Use Assets	7	6,255		6,689		
Prepayments falling due after one year	9	168		388		
Total non-current assets			207,574		206,472	
Current assets:						
Inventories		179		191		
Trade and other receivables	9	6,768		5,331		
Cash and cash equivalents		1,279		1,629		
Total current assets			8,226		7,151	
Total assets			215,800		213,623	
Current liabilities						
Trade and other payables	10	(7,555)		(8,416)		
Contract liabilities	10	(119)		(131)		
Obligations under finance leases	7	(552)		(525)		
Total current liabilities			(8,226)		(9,072)	
Total assets less current liabilities			207,574		204,551	
Non-current liabilities:						
Contract liabilities	10	(199)		(194)		
Obligations under finance leases	7	(6,011)		(6,406)		

Total non-current liabilities	(6,210)	(6,600)
Total assets less liabilities	201,364	197,951
Taxpayers' equity and other reserves:		
General fund	52,651	51,399
Revaluation reserve	148,559	146,538
Donated asset reserve	154	14
Total equity	201,364	197,951

Sand Nami

Saul Nassé Accounting Officer 16 July 2025

Statement of Cash Flows for the year ended 31 March 2025

	Note	2024-25 £000	2023-24 £000
Cash flows from operating activities			
Net operating expenditure		(46,975)	(48,670)
Adjustments for non-cash transactions	3	8,455	7,516
(Increase)/decrease in trade and other receivables	9	(1,217)	1,008
(Increase)/decrease in contract assets	9	-	131
(Increase)/decrease in inventories		12	(21)
Increase/(decrease) in trade and other payables	10	(856)	3,112
Increase/(decrease) in contract liabilities	10	(12)	(6)
Movements in payables to the consolidated fund not passing through the SoCNE	10	350	(1,555)
Net cash outflow from operating activities		(40,243)	(38,485)
Cash flows from investing activities			
Purchase of property, plant and equipment	5	(4,815)	(1,283)
Purchase of intangible assets	6	(2,585)	(1,840)
Capital Donation	6	144	-
Net cash outflow from investing activities		(7,256)	(3,123)
Cash flows from financing activities			
From the Consolidated Fund (Supply) – current year		47,744	43,726
Repayment of capital element of obligations under finance leases	7	(529)	(494)
Interest element of obligations under finance leases	7	(66)	(69)
Net cash flows from financing activities		47,149	43,163

Net increase/(decrease) in cash and cash equivalents	(350)	1,555
Cash and cash equivalents at the beginning of the period	1,629	74
Cash and cash equivalents at the end of the period	1,279	1,629

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

	Note	General Fund	Revaluation Reserve	Donated Asset Reserve	Taxpayers' equity
		£000	£000	£000	£000
Balance at 1 April 2023		57,762	140,474	17	198,253
Net Parliamentary funding		42,172	-	-	42,172
Net expenditure for the year		(48,670)	-	-	(48,670)
Other comprehensive expenditure		(3)	6,101	-	6,098
Auditor's remuneration	3	98	-	-	98
Transfers between reserves		40	(37)	(3)	-
Balance at 31 March 2024		51,399	146,538	14	197,951
Net Parliamentary funding		48,094	-	-	48,094
Net expenditure for the year		(46,975)	-	-	(46,975)
Other comprehensive expenditure		140	2,059	-	2,199
Auditor's remuneration	3	95	-	-	95
Transfers between reserves		(102)	(38)	140	-
Balance at 31 March 2025		52,651	148,559	154	201,364

The General Fund records all changes in financial resources for the year, with the exception of those recorded in other reserves. This includes the Parliamentary funding provided and the net expenditure for the year.

The Revaluation Reserve reflects the gain or loss on the revaluation of assets other than donated assets. Each year, an amount equal to the excess annual depreciation from the revaluation reserve is transferred to the General Fund, which makes sure that by the time the asset is fully depreciated there is no residual balance associated with the asset in the Revaluation Reserve. The Revaluation Reserve relates completely to tangible assets.

The Donated Asset Reserve shows the value of assets donated to The National Archives; value is added when the asset is donated and the assets are depreciated in the same way as other assets. Depreciation is charged to Other Comprehensive Expenditure in the Statement of Comprehensive Net Expenditure (SoCNE). On recognition, there is an equal and opposite transfer of income from the donation to other operating revenue in the SoCNE, so that the value of the asset in the Statement of Financial Position remains balanced by the value in the Donated Asset Reserve.

Notes to the Departmental Resource Accounts

1. Statement of accounting policies, key accounting estimates and judgments

1.1 Statement of accounting policies

These accounts have been prepared in accordance with the Government Financial Reporting Manual 2024-25 (FReM) issued by HM Treasury, as required by the statutory Accounts Directions issued pursuant to section 5(2) of the Government Resources and Accounts Act 2000. The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context.

The accounting policies adopted by The National Archives are described below. Where the FReM permits a choice of accounting policy, the accounting policy that is judged to be most appropriate to the particular circumstances of The National Archives is applied for the purpose of giving a true and fair view. They have been applied to all items that are material to the accounts.

In addition to the primary statements prepared under IFRS, the FReM also requires the department to prepare an additional primary statement. The Statement of Parliamentary Supply and supporting notes show outturn

against Estimate in terms of the net resource requirement and the net cash requirement.

1.2 Basis of preparation

These accounts have been prepared under the historical cost convention (the practice of recording the original cost of an asset at its cost on a balance sheet) modified to account for the revaluation of non-current assets, where material, at their value to the business by reference as applicable to their current costs, replacement costs or indices.

Transactions denominated in foreign currency are translated into sterling at the exchange rate ruling at the time of the transaction.

Any assets and liabilities in a foreign currency are translated into sterling at the exchange rate on the date of reporting.

Areas of significant estimates and judgments

The preparation of financial statements requires management to make judgments, estimates and assumptions that affect the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates. The financial statements of The National Archives include estimates and assumptions that could influence the financial statements of subsequent financial years.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected.

The estimates and judgments that had a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next accounting period are:

- IAS 16 Land and Buildings: Professional valuations are required every five years at a minimum with a professional desktop valuation used in intervening years. In the current year, the land and buildings are stated at fair value using a professional desktop valuation. Further details are in note 5.
- Heritage assets: Reliable information on cost or valuation is not available for the department's collection of heritage assets and, accordingly, an accounting judgment has been made not to value these in the financial statements. Further details are in note 8.
- IAS 38 Intangible assets: The valuations of licences issued to third parties and internal revenue-generating databases are based on forecasts of probable future revenue generating capacity, which are uncertain. Further details are in note 6.
- IFRS 15 Revenue Recognition: On transition to IFRS 15, judgments were made relating to the determination of performance obligations in each of the major revenue streams, which had the potential to impact the revenue recognition pattern under the contract. Any new revenue streams are assessed against IFRS 15 as and when they commence. Assumptions are required to determine

an appropriate measure of progress when determining how control over promised goods or services transfers to the customer. Estimates are made at year end to recognise revenue where actual sales are unknown. Further details are in note 4.

Going concern

In common with other government departments, The National Archives' liabilities are expected to be met by future grants of supply and the application of future income, both to be approved annually by Parliament. There is no reason to believe that future Parliamentary approval will not be forthcoming, and therefore, in accordance with FReM 4.2.14, it has been concluded as appropriate to adopt the going concern basis of preparation for these accounts.

In forming this view, the directors note that the department:

- i. applies prudent financial management in order to ensure that its commitments are accommodated within the timing of allocated budget;
 and
- ii. undertakes a robust and detailed annual business planning and budgeting process to establish its operational cost requirements for each financial year.

1.3 Accounting standards issued but not yet effective

IFRS 17 Insurance Contracts is expected to replace IFRS 4 from 01 April 2025 for public sector organisations. The scope of the standard covers insurance contracts issued

or held. This reporting standard has been reviewed and is anticipated to have no accounting impact upon The National Archives as no such insurance contracts are held.

IFRS 18 Presentation and Disclosure in Financial Statements is expected to replace IAS 1 from 1 April 2028 for public sector organisations. The scope of the standard covers general and specific requirements for the presentation of information in the primary statements and notes to the accounts.

IFRS 18 aims to improve financial reporting by:

- requiring an entity to present two new defined subtotals in the statement of profit or loss.
- requiring an entity to disclose management-defined performance measures.
- adding new principles for aggregation and disaggregation of items.

HM Treasury are currently working with the Financial Reporting Advisory Board (FRAB) to agree how the new standard will be interpreted by the FReM and used in the Annual Accounts and Report for public sector bodies.

Accounting policies for expenditure

1.4 Staff costs

Staff costs include wages and salaries, social security costs and pension costs. All short-term staff costs payable at the year end, which will be paid within one year from the date of reporting, are recognised in the Statement

of Comprehensive Net Expenditure. These include any accrued leave entitlements.

1.5 Pensions

Most past or present employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS) and Alpha (a pension scheme introduced on 1 April 2015), which are defined benefit schemes open to participating public sector bodies in which the benefit the employee receives during retirement is dependent on factors such as age, length of service and salary. These schemes are administered by MyCSP on behalf of the Cabinet Office. The National Archives pays contributions into these schemes at an agreed rate. As one of many participating organisations, The National Archives is not able to identify its share of any liability for making future pension payments to members and, accordingly, The National Archives accounts for this as if it were a defined contribution scheme and recognises the costs of these contributions when they fall due.

Employees may opt to join a personal stakeholder pension scheme instead, providing the scheme meets the minimum criteria set by government. These are defined contribution schemes where The National Archives pays established contribution rates into a separate fund. The amount of pension benefit that a member receives in retirement is dependent on the performance of the fund. The National Archives recognises the cost of these contributions in the Statement of Comprehensive Net Expenditure when they

fall due. There is no further payment obligation once the contributions have been paid.

1.6 Early departure costs

Where The National Archives ends the employment of a staff member and makes a compensation payment within the rules of the Civil Service Compensation Scheme (CSCS), the cost of that payment is recognised in full in the year the individual accepts the terms of the compensation payment.

1.7 Grant expenditure

Grants payable are recognised when the criteria for a constructive obligation are met, payment is probable, values can be measured reliably, and there are no conditions attached to its payment that limit its recognition.

1.8 Value Added Tax (VAT) on purchases

The National Archives reclaims VAT on purchases under section 41 (3) of the VAT Act 1994. Under this provision, HM Treasury issues a Direction commonly known as the 'Contracting Out Direction' which lists the government departments that are eligible to claim refunds of VAT, and the services on which VAT can be reclaimed.³⁹ Where The National Archives makes purchases on which VAT cannot be recovered, it is charged to the relevant expenditure category or included in the capitalised purchase price of non-current assets.

³⁹ A full list of the services on which VAT can be reclaimed under the Contracting Out Direction can be found at gov.uk/hmrc-internal-manuals/vat-government-and-public-bodies/vatqpb9700.

Accounting policies for income

1.9 Contract income

The National Archives recognises revenue from customers in accordance with IFRS 15. The standard sets out that the point of recognition is based on when performance obligations of a contract are satisfied and the benefits are fully received by the customer.

Revenue principally comprises contracted charges for services provided for the sale of copies of documents, sale of publications and other items and services, reproduction fees, income generated by the licensing of digital copies of historical records and storage facility income. Costs associated with the contracted revenue are recognised in the same accounting period.

Further details of The National Archives' recognition of contracted income are set out in note 4.

1.10 Other income

Other operating income includes grants and contributions from other organisations (including other government departments) to carry out specific projects, as well as lessor income.

Grant and contribution income is recognised as income over the period necessary to match them with the related costs for which they are intended to compensate, in accordance with IAS 20. Where funds are received in advance of work starting on the project, these are held as deferred revenue until the related costs are incurred.

Lessor income results from The National Archives renting out sections of the building to third parties. Rental income is recognised as it falls due. Rental income includes a service charge levied on an annual basis to recover central costs borne by The National Archives.

1.11 Value Added Tax (VAT) on sales

Where output tax is chargeable, income is stated net of VAT.

The National Archives does not charge VAT for any work it carries out under statute.

Accounting policies for assets and liabilities

1.12 Property, plant and equipment and intangible assets

Expenditure of £5,000 or more on property, plant and equipment or intangible assets is capitalised where it is expected to bring benefit over future years. On initial recognition, assets are measured at cost and include all costs directly attributable to bringing them into working condition. This includes the costs of external contractors who deliver on information technology projects as well as salaries of internal staff working on particular capital projects. Where bulk purchases are made for individual assets whose unit costs are below the threshold, but in aggregate exceed £30,000 within a financial year, the assets are capitalised.

All non-current assets are reviewed annually for impairment and are carried at fair value. Property, plant, and equipment is depreciated, and intangible assets amortised, on a straight-line basis over their useful lives to ensure that they are reported at their estimated residual value at the end of their lives.

Property, plant and equipment

The National Archives' buildings and grounds at Kew are freehold property. The land and buildings are stated at fair value using professional valuations, by property valuers having appropriate recognised professional qualifications and recent experience in the location and category of the properties being valued, every five years at a minimum. In intervening years, the value is stated at fair value using a professional desktop valuation.

Non-property assets comprise: Plant and Equipment; Furniture Fixtures and Fittings; Computers and Equipment. Assets held at present within these categories mostly have a short lifespan of 10 years or less. Many, particularly within Computers and Equipment have only a 5 year lifespan and are also of low value. These assets are valued at depreciated replacement cost in existing use, which is used as a proxy for fair value.

Mobile Racking, which sits within Furniture, Fixtures and Fittings has a 50 year lifespan. This is a highly specialised bespoke set of assets for which there is no useful or relevant evidence of recent market transactions, and they are also valued at depreciated replacement cost in existing use as a proxy for fair value.

Expenditure on restoration and conservation work is part of the normal operating costs of The National Archives and is not capitalised; it is recorded as part of programme costs.

Depreciation

Depreciation is provided at rates calculated to write off the valuation of freehold buildings and other non-current assets by equal instalments over their estimated useful lives. Freehold land and assets in the course of construction are not depreciated.

Asset lives are in the following ranges:

Asset class	Life range
Buildings	up to 40 years
Computers and equipment	up to 10 years
Plant and machinery	up to 25 years
Furniture, fixtures, and fittings	up to 50 years
Transport equipment	up to 10 years

Leases

The National Archives accounts for leases under IFRS16 Leases, with the costs, depreciation and other associated disclosures being shown in Note 7. No recognition of assets and liabilities is done for leases where the underlying asset is of low value, or for where the lease term is less than 12 months.

The National Archives has one lease recognised under IFRS16 Leases, a storage facility at Deepstore.

Initial Recognition

At the commencement of a lease, The National Archives recognises a right-of-use asset and a lease liability.

The lease liability is measured at the present value of the lease payments that are not paid at the commencement date, discounted using either the rate implicit in the lease, or (where this cannot be determined) the HM Treasury discount rate published in the Public Expenditure (PES) Discount Rates paper.

The right-of-use asset is initially recognised at an amount equal to the lease liability, adjusted for: any payments made or amounts accrued before the commencement date, lease incentives received, incremental costs in obtaining the lease, and any disposal costs at the end of the lease.

Subsequent Measurement

The lease liability is adjusted for interest charges, lease repayments and any remeasurement of the future lease payments based on inflation-linked increases.

Right-of-use assets are depreciated on a straight line basis over the term of the lease. At year end, they are revalued in line with the remeasurement of the liability and depreciation is adjusted for future years based on the updated value of the asset.

Intangible assets

Intangible assets comprise software licences purchased from third parties, amortised over the life of the licence, and the cost of developing internal software assets, amortised on a straight-line basis over the useful economic life of the asset.

In addition, The National Archives recognises licences issued to third parties and internal revenue generating databases (such as our Digital Download and Image Library services) as intangible assets with indefinite lives, reflecting their underlying nature of supporting public records.

Asset lives are in the following ranges:

Asset class	Life range
Software licences	up to 5 years
Internally developed software	up to 15 years
Licences issued to third parties	indefinite
Internally developed revenue-generating databases	indefinite

The assets with a definite lifespan are stated at historical cost less accumulated amortisation and accumulated impairment losses as a proxy for fair value, as no active market exists for them.

The valuation adopted for licences issued to third parties and internal revenue generating databases is based on current forecasts of reasonably foreseeable future revenue generating capacity, discounted as appropriate. Further details of the effects of changes in our forecast estimates are shown under Note 6 of the accounts.

1.13 Heritage assets

The National Archives holds an internationally, historically significant collection of physical records and artefacts, as well as a significant and growing digital archive, which are collectively classed as non-operational heritage assets. These are held in order to fulfil our statutory function, which includes ensuring that important information is preserved and that it can be accessed and used.

Information regarding our collections is available via our online catalogue, Discovery, which contains descriptions of a broad range of documents and other types of records. In addition, accessioned and published Court Judgments are available from the Find Case Law service.⁴⁰ Web archived material is available through the UK Government Web Archive.⁴¹

In the opinion of The National Archives' Board, reliable information on cost or valuation is not available for the department's collection of heritage assets. This is due to the diverse nature of the assets held, the lack of information on purchase cost (as the assets are not purchased) and the volume of items held. As well as the aforementioned, any market value placed on these assets would not be a true reflection of the value of the assets to the nation's heritage; the assets, if lost, could not be replaced or reconstructed. These assets are therefore not reported in the Statement of Financial Position.

⁴⁰ https://caselaw.nationalarchives.gov.uk/

⁴¹ https://www.nationalarchives.gov.uk/webarchive/

Certain items within the overall collection are of particular significance, including Domesday Book, one of our most prized national treasures, which has been preserved for over nine centuries and is now cared for at Kew; two contemporary versions of Magna Carta; unique records of official treaties; and a host of irreplaceable social records including the 1921 Census and early-twentieth century historical military service personnel records. Further details of the preservation and management of our heritage assets are provided in note 8 of the accounts.

1.14 Cash and cash equivalents

Cash and cash equivalents comprise current balances held at the Government Banking Service. Any amounts held in foreign currency are translated into sterling at the exchange rate on the date of reporting.

1.15 Contract and trade receivables

Contract receivables are amounts invoiced and due from software development, licences, record copying or other services.

Trade receivables are amounts invoiced and due in respect of lessor income, grant income and specific Government Contracts.

Trade receivables do not carry any interest and are stated at their nominal value as reduced by appropriate allowances for irrecoverable amounts. These impairment provisions are recorded in administrative expenses in the Statement of Comprehensive Net Expenditure. The

carrying amount of trade receivables is deemed to be an approximation of fair value.

If collection of amounts receivable is expected in one year or less they are classified as current assets. If not, they are presented as non-current assets.

1.16 Contract assets and liabilities

Contract assets relate to our enforceable right to consideration for our completed performance in respect of contracts where that work has not yet been invoiced. It is determined on the basis of work undertaken at the period end, less any provision for unrecoverable amounts.

Payments received in advance of performance under the contract are recognised as contract liabilities. This is then recognised as revenue as the work is performed.

2. Statement of Operating Expenditure by Operating Segment

IFRS 8 Operating Segments requires operating segmental information to be provided based on information that the Chief Executive as Chief Operating Decision Maker (CODM) uses to make decisions about the organisation. This information, reviewed by the CODM, is currently presented based on our management structure as per page 67 to 72. To aid readers' understanding, the segments below have been presented in line with our public task, which can be summarised as: leading on policy and best practice in knowledge and information management for the

public sector; preserving and protecting the record; and providing public access.

In accordance with IFRS 8, below is a schedule of income and expenditure against each identified segment. Overheads are allocated proportionally based on the direct costs of each segment.

	Government information management 2024-25	Preservation and protection 2024-25	Public access 2024-25	Total 2024-25
	£000	£000	£000	£000
Income	(6,274)	(1,419)	(13,252)	(20,945)
Operating expenditure	13,115	18,011	29,132	60,258
Depreciation, amortisation and impairment	1,668	2,290	3,704	7,662
Net operating expenditure	8,509	18,882	19,584	46,975

	Government information management 2023-24	Preservation and protection 2023-24	Public access 2023-24	Total 2023-24
	£000	£000	£000	£000
Income	(4,465)	(980)	(9,779)	(15,224)
Operating expenditure	11,314	16,521	28,683	56,518
Depreciation, amortisation and impairment	1,477	2,156	3,743	7,376
Net operating expenditure	8,326	17,697	22,647	48,670

3. Operating expenditure

		2024-25 £000		2023-24 £000
Staff costs				
Wages and salaries	25,250		24,902	
Social Security costs	2,695		2,533	
Other pension costs	6,681		6,016	
Less capitalised staff costs	(1,388)		(759)	
Total staff costs		33,238		32,692
Purchase of goods and services				
Costs of Sales	692		159	
Employee Related Costs	889		804	
Business Rates	3,623		3,405	
Property Costs	4,828		4,460	
IT & Telecoms	5,220		4,512	
Archival Maintenance	926		663	
Marketing and Communications	333		358	
Grants Paid	1,617		1,120	
Contracted Services	6,807		7,209	
Audit, Finance, Legal & Professional	359		223	
Other Costs	933		773	
Total goods and services		26,227		23,686
Non-cash items				
Depreciation and amortisation				
- Civil estate	4,860		4,506	

- Other non-current assets	2,802		2,793	
Total depreciation		7,662		7,299
Auditor's remuneration – audit work	95		98	
Right of Use Asset interest charge	66		69	
Loss on Disposal	22			
Impairment	610		77	
Change to onerous lease provision	-		(27)	
Total other non-cash items		793		217
Total non-cash items		8,455		7,516
Total operating expenditure		67,920		63,894

Further analysis on staff numbers, compensation scheme packages and pension disclosures can be found from <u>page 110</u>, within the Accountability Report.

No fees have been paid to auditors for non-audit work in the financial year 2024-25.

4. Income

The following are descriptions of the principal contracted activities, their associated performance obligations and significant payment terms under IFRS 15.

Revenue stream	Timing of performance obligations and significant payment terms
Licensing royalties Commercial partners use accessioned content on their websites or within their online products. Royalties are due to us when their subscribers use this content, or customers purchase their products.	Revenue is recognised in line with usage/ sales. A statement is received from the partner detailing usage/sales during the period which is then billed for. Billing arrangements vary from a monthly to quarterly or annual basis.
	An estimation of usage/sales is made for the last quarter where statements have not been received, based on forecasts and information from partners, and is accrued through the SoCNE.
Record Copying (statutory provision) Digital or paper copies of our accessioned records are sold to individual customers.	Revenue is recognised at the point where the copies are provided to the customer. Billing takes place prior to distribution of the copies.
Digitisation A digitisation service for bulk orders from third parties. The records can belong to us or to external parties. Digitised copies are provided on hard drives.	Revenue is recognised at the point where the copies are provided to the third party and is typically billed in advance. Projects on which work has begun, but which has not been delivered at the reporting date, are held as contract assets at the value of the work completed to date.
Storage income Commercial partners store records in The National Archives storage facility.	Revenue is recognised in line with usage, with billing arranged quarterly.

Revenue stream

Timing of performance obligations and significant payment terms

Drafting tools

Publishing legislation on behalf of other government departments and devolved administrations.

A fee is charged per document published and recognised in line with publication. Billing on a quarterly basis.

Licensing resales

Copies of images digitised either by a licensing partner, or by The National Archives, can be resold to another licensing partner or digitisation customer. When sold to another licensing partner, this will be alongside a license to publish and The National Archives will also benefit from future royalties.

Revenue is recognised at the point where the images are transferred and the licensing partner obtains control of the right to publish, unless it is a sale to a licensing partner where the images are required to be updated over the period that they have access to the material, in which case it is recognised over the period of the licence. Payment is received either in advance or on delivery.

Gazette Income

The Gazette is the official newspaper of the government and is printed and distributed by our publishing partner. The income is principally driven from advertisements placed in the paper both statutory and non-statutory.

A new contract came into place on 01 January 2025. Under the old contract, revenue is recognised on a sliding scale as set out in the contract with the publisher. The contract period is annual and based on a percentage of the revenue with the percentage increasing as turnover thresholds are reached.

The contract is based on a calendar year and the lowest percentage is used to calculate the revenue for January to March as any additional revenue cannot be guaranteed until the turnover threshold in that year has been exceeded.

Under the new contract, revenue is recognised at a fixed percentage when it is generated.

Revenue stream

Timing of performance obligations and significant payment terms

Contract Assets

Where work has begun on a contract but the performance obligation has not been fully satisfied by year end, and payment for the work is dependent on future performance, the value of the work is held as a contract asset.

Contract Liabilities

Where work has been billed in advance and delivery has not taken place by year end, the value of the invoices raised are held as a contract liability.

Revenue in 2024-25 has significantly increased, mainly due to one-off sales but also because of new contracts with existing partners.

The Gazette income has increased due to a new contract improving our revenue share as well as greater underlying activity.

Licensing resales includes the resale of the 1921 Census to Ancestry for £2.2 million.

Grant income benefits from large new grants for the Archives Revealed and RICHeS programmes, although this is largely for the purpose of grant making and so is offset by increased grant expenditure.

Fees charged to other government departments shows the greatest increase; much of this is due to recharges for work on the Parliamentary Archive relocation, but there are also fees charged to the Northern Ireland Assembly to develop Lawmaker for their use in the future.

	2024-25 £000	2023-24 £000
Revenue from contracts with customers		
Licensing royalties	3,794	3,368
Record copying	608	617
Gazette income	7,229	5,946
Digitisation	767	453
Storage income	531	588
Shop income	268	321
Drafting tools	142	117
Licensing resales	2,512	813
Legislation services	105	105
Digital downloads	35	34
Other	829	854
Total revenue from contracts	16,820	13,216
Other operating income	2024-25 £000	2023-24 £000
Fees charged to other government departments	2,328	737
Grant income	1,436	949
Apprenticeship levy notional income	5	14
Lessor income	356	308
Total other operating income	4,125	2,008
Total income	20,945	15,224

5. Property, plant and equipment

	Land £000	Buildings £000	Plant and Machinery £000	Furniture fixtures and fittings £000	Computers and equipment £000	Assets under construction £000	Total £000
Cost or valuation							
At 1 April 2024	34,260	114,684	15,588	13,798	12,402	1,286	192,018
Additions	-	1,788	1,179	909	487	452	4,815
Reclassification	-	347	859	64	-	(1,270)	-
Impairment	-	-	-	-	-	-	-
Disposals	-	-	(99)	(15)	(103)	-	(217)
Revaluation	-	(1,822)	-	-	-	-	(1,822)
At 31 March 2025	34,260	114,997	17,527	14,756	12,786	468	194,794
Depreciation							
At 1 April 2024	-	-	9,746	7,592	11,195	-	28,533
Charged in year	-	4,863	837	571	505	-	6,776
Reclassification	-	-	-	-	-	-	-
Disposals	-	-	(77)	(15)	(103)	-	(195)
Revaluation	-	(4,863)	-	-	-	-	(4,863)
At 31 March 2025	-	-	10,506	8,148	11,597	-	30,251
Net book value							
At 31 March 2025	34,260	114,997	7,021	6,608	1,189	468	164,543
At 31 March 2024	34,260	114,684	5,842	6,206	1,207	1,286	163,485

	Land £000	Buildings £000	Plant and Machinery £000	Furniture fixtures and fittings £000	Computers and equipment £000	Assets under construction £000	Total £000
Cost or valuation							
At 1 April 2023	34,150	112,550	14,111	12,582	12,364	3,587	189,344
Additions	-	-	318	56	91	818	1,283
Reclassification	-	514	1,159	1,160	209	(3,042)	-
Impairment	-	-	-	-	-	(77)	(77)
Disposals	-	-	-	-	(262)	-	(262)
Revaluation	110	1,620	-	-	-	-	1,730
At 31 March 2024	34,260	114,684	15,588	13,798	12,402	1,286	192,018
Depreciation							
At 1 April 2023	-	-	8,915	7,024	10,941	-	26,880
Charged in year	-	4,506	831	568	516	-	6,421
Reclassification	-	-	-	-	-	-	-
Disposals	-	-	-	-	(262)	-	(262)
Revaluation	-	(4,506)	_	-	-	-	(4,506)
At 31 March 2024	-	-	9,746	7,592	11,195	-	28,533
Net book value							
At 31 March 2024	34,260	114,684	5,842	6,206	1,207	1,286	163,485
At 31 March 2023	34,150	112,550	5,196	5,558	1,423	3,587	162,464

Notes

Freehold land and buildings were valued as at 31 March 2025 at £149.3 million by Montagu Evans (the 'Valuer'), acting in the capacity of external valuers. This valuer also provided a valuation last year and as such this year performed a desktop valuation, using existing floorplans and breakdown of component areas.

The valuation was produced in accordance with the requirements of the Government Financial Reporting Manual, and the Royal Institute of Chartered Surveyors Valuation – Global Standards, 2020 (Red Book), to include the International Valuation Standards, and the RICS Valuation – Global Standards, 2017: UK National Supplement.

The valuation was on the basis of Fair Value Market Value, as adapted by the FReM for the public sector context. The Valuer's opinion of Fair Value was primarily derived using the depreciated replacement cost approach because the specialised nature of the assets means that there are no market transactions of this type of asset except as part of the business or entity.

The BCIS Tender Price Index was used to calculate the value of Kew 1 and Kew 2 Buildings, with the useful economic life of Kew 1 being increased by 6 months to reflect the improvement to the building by replacing the repository windows on floors 2-4.

The Land value has remained constant, reflecting the static prices of land in the Kew area over the year to 31 March 2025.

Revaluation in year is accounted for within other comprehensive net expenditure (page 163) and accumulated in taxpayers' equity under the revaluation reserve.

6. Intangible assets

	Software licences £000	Internally developed IT Systems £000	Internally developed revenue- generating databases £000	Licences issued to third parties £000	Assets in development £000	Total £000
Cost or valuation	n					
At 1 April 2024	916	3,928	459	28,180	3,933	37,416
Additions	-	-	-	-	2,585	2,585
Reclassifications	-	477	-	-	(477)	_
Impairment	-	-	-	-	(610)	(610)
Revaluation	-	-	85	(1,067)	-	(982)
At 31 March 2025	916	4,405	544	27,113	5,431	38,409
Amortisation						
At 1 April 2024	888	618	-	-	-	1,506
Charged in year	15	280	-	-	-	295
At 31 March 2025	903	898	-	-	-	1,801
Net book value						
At 31 March 2025	13	3,507	544	27,113	5,431	36,608
At 31 March 2024	28	3,310	459	28,180	3,933	35,910

	Software licences £000	Internally developed IT Systems £000	Internally developed revenue- generating databases £000	Licences issued to third parties £000	Assets in development £000	Total £000
Cost or valuation	n					
At 1 April 2023	916	2,777	506	28,267	3,244	35,710
Additions	-	-	-	-	1,840	1,840
Reclassification	-	1,151	-	-	(1,151)	-
Revaluation	-	-	(47)	(87)	-	(134)
At 31 March 2024	916	3,928	459	28,180	3,933	37,416
Amortisation						
At 1 April 2023	835	370	-	-	-	1,205
Charged in year	53	248	-	-	-	301
At 31 March 2024	888	618	-	-	-	1,506
Net book value						
At 31 March 2024	28	3,310	459	28,180	3,933	35,910
At 31 March 2023	81	2,407	506	28,267	3,244	34,505

Intangible assets in development are Internally developed IT systems which are not yet in use and will only be subject to amortisation once they have been brought into use.

There are currently three projects in development:

- Explore The National Archives (ETNA): a re-development of our website and Discovery service.
- Transfer Digital Records (TDR): a series of services which will allow government departments to transfer their digital records to our custody seamlessly.
- Omega: a transformation of the catalogue, replacing legacy systems.

The annual impairment review of intangible assets confirmed management's belief that the carrying value of Omega project required an adjustment.

Development on the project was paused in 2023-24 due to resourcing pressures. The work completed up until that point had resulted in four separate, but interlinked, sections of the asset: Data Services, API Services, Messaging Fabric and a User Interface.

A reduced scope for the project was agreed by the Executive Team in February 2025, largely driven by the availability of new technology (Talend) which can now be integrated into the development of the catalogue. As such, the Messaging Fabric and User Interface are no longer required and will not be developed further. The value of this work was £610,397, which has been written off.

The Data Services and API Services will be further developed in 2025-26 with a view to bringing them into use by the end of the financial year.

Internally developed revenue-generating databases and licences issued to third parties are assets based on forecasts of future revenue generating capacity. The revenue-generating databases include the Image Library and Digital Downloads, which generate revenue through customers purchasing copies of The National Archives' digitised records. Licences issued to third parties are the licences issued to licensing partners for which royalties will be generated on their sales/usage of The National Archives' records.

Revaluation in year is accounted for within other comprehensive net expenditure (page 163) and accumulated in taxpayers' equity under the revaluation reserve. Any decrease in valuation of an asset in year has not exceeded any amount previously credited to the revaluation surplus.

The intangible asset revaluations of revenue-generating databases and licences issued to third parties are based on forecasts of future revenue generating capacity as at 31 March 2024, discounted using the rate of 3.5% set out in HM Treasury's The Green Book. The forecast cashflows estimated are subject to market conditions as they are dependent on customer use of the products offered – both existing and new. If the cashflows were not discounted, the value of the revenue-generating databases would be £611k and the licences issued would be £32.2 million.

Below is a sensitivity analysis of the effects of changes in the forecast assumptions on the amounts disclosed in the accounts.

Market risk – assumptions tested	Increase/ (decrease) in 2024-25 valuation
	£000
2024-25 income 10% less than forecast for revenue generating databases	(100)
2024-25 income 10% higher than forecast for revenue generating databases	100
2024-25 income 10% less than forecast for licences issued	(3,104)
2024-25 income 10% higher than forecast for licences issued	3,104

IAS 36 requires intangible assets with an indefinite useful economic life to be tested for impairment annually and whenever there is an indication that the asset may be impaired, by comparing its carrying amount with its recoverable amount. As a result of undertaking this exercise there is no impairment to the value of the assets.

7. Leases

The National Archives has one lease recognised as a right-of-use leased asset under IFRS16, a storage facility at Deepstore.

The lease liability is measured at the present value of the lease payments not paid at the commencement date, discounted using the HM Treasury rate of 0.95% as in the Public Expenditure System (PES) 2021 10 Discount rates paper. Future lease payments are subject to an annual increase based on the Retail Price Index (RPI) as at 31 October each year. The calculation of the lease liability inflates future lease payments using inflation rates from the PES 2023 10 Discount rates paper, except for where another inflation rate is more applicable. For the closing liability, the expected cashflow for 2025-26 has been calculated using the known rate of 3.4%. For cashflows past this, the PES rates of 2.3% for 2026-27 and 2.0% for cashflows after this point into perpetuity have been used.

7a) Right of Use Leased Assets

	2024-25	2023-24
	£000	£000
Cost or valuation		
At 1 April	7,849	7,689
Remeasurement	161	160
At 31 March	8,010	7,849
Depreciation		
At 1 April	1,160	580
Charged in year	595	580
At 31 March	1,755	1,160
Net Book Value	6,255	6,689

7b) Lease Liability

	2024-25	2023-24
	£000	£000
Balance at 1 April	6,931	7,265
Remeasurement	161	160
Finance charge	66	69
Lease payments in year	(594)	(563)
Balance as at 31 March	6,564	6,931

The following table shows the maturity analysis of undiscounted cashflows:

	2024-25	2023-24
	£000	£000
Within one year	614	591
Later than one year and not later than five years	2,590	2,477
Beyond five years	3,727	4,287
Total	6,931	7,355

7c) Amounts recognised in the Statement of Comprehensive Net Expenditure

	2024-25	2023-24
	£000	£000
Interest charge	66	69
Depreciation charge	595	580
Total	661	649

7d) Amounts recognised in Statement of Cashflow

	2024-25	2023-24
	£000	£000
Principal repayment of lease	594	563
Finance charge	66	69
Depreciation charge	595	580
Total	1,255	1,212

8. Further information on heritage assets

8a) Accessioning

There is a short time immediately following receipt of newly transferred records before they are formally accessioned into The National Archives' collection and added to our catalogue. For physical records, transfer deliveries are scrutinised for completeness and there is an element of physical and system processing needed before they can be accessioned. This includes ensuring that the physical condition of the records is acceptable, that the information provided for the catalogue reflects the content of the records and that the access conditions for each record (open or closed) are correct.

For digital records, a number of technical checks are carried out to the records themselves and also to the accompanying metadata, as part of the accessioning process. The Transfer Digital Records service automates this process and provides us with a chain of custody for the records. For non-standard digital transfers, such as records

sent on a hard disk, we check and may need to correct the accompanying metadata for accuracy and completeness prior to accessioning the records.

The National Archives is currently undertaking a project to transfer into its care records previously held by the Ministry of Defence. This is a highly complex and atypical transfer that will significantly increase the size of our collection. The accessioning of and provision of access to these records present a number of challenges to our usual ways of working. These records do not undergo formal accessioning in the same way or to the same timescales as other transfers. Nevertheless, these records are carefully monitored and recorded and are subject to controls over documentation, holdings, physical access and storage location that are analogous to those in place for routine transfers.

The National Archives also holds a limited amount of unaccessioned material that reached Kew by non-standard routes, often long before current processes were put in place. This un-accessioned material is documented and accounted for and subject to periodic audits and information about the material is held in The National Archives' electronic filing systems. The records themselves are allocated a temporary location on the relevant system and physically held in a repository protected by enhanced access controls, to ensure that they can only be accessed by staff with a legitimate need to do so.

8b) Preservation and management

Government bodies select digital and physical records for permanent preservation and transferring these records to The National Archives. These bodies are subject to the 20-year rule as part of their responsibilities under section 3(4) of the Public Records Act 1958. The Senior Courts transfer their judgments in digital format, usually on the day the decision is handed down.

The National Archives is the guardian of the nation's public records. Its core role includes preserving and protecting, making available and bringing to life the vast collection of historical information it holds. Most of the records are unique and irreplaceable and have been preserved for their historical, social, legal and administrative value. This includes significant collections of digital records.

We adopt a risk-based approach in preserving our digital and physical records. This consists of conducting a preservation risk assessment for whole collections, which is reviewed periodically. The National Archives adopts a combined approach of preventative measures and conservation treatments for records in their digital and physical forms.

Expenditure that is required to preserve or clearly prevent further deterioration of individual collection items is recognised in the Statement of Comprehensive Net Expenditure when it is incurred.

Our approach to preservation risk

Physical records

The physical records held by The National Archives span the period from the Middle Ages to the present day and are stored on site at Kew and at the Deepstore facility in Cheshire. They comprise a variety of formats: parchment, traditional paper records, seals, maps, costumes, paintings, films, items of court evidence, and more.

The conservation, preservation and care of this unique and irreplaceable collection is a challenging responsibility, given the age and condition of some of the physical materials. We have a dedicated team responsible for the long-term preservation of The National Archives' physical collection for continued access and future use, and we improve the stability of our most vulnerable records through conservation work.

We seek appropriate and secure accommodation for all our holdings, wherever they are stored, processed, transferred, transported or used. This includes providing suitable environmental conditions and appropriate housing. It also includes monitoring via an integrated pest management programme and an environmental monitoring system. We recognise that of all potential risks to the long-term preservation of our records, inappropriate storage is the most significant.

The Secretary of State has delegated their power at section 2(4)(g) of the Public Records Act 1958 to the Chief Executive of The National Archives (in his capacity as

Keeper of Public Records). The Chief Executive therefore has delegated authority to lend documents for display at exhibitions. All loans are conducted in accordance with our exhibitions policy and are subject to criteria agreed with Department for Culture, Media and Sport officials, in line with the loans policies of other major cultural heritage institutions.

Digital records

The National Archives takes a leading role in managing the issues associated with the survival and preservation of today's digital public records. We have produced and have published DiAGRAM, a digital preservation risk model, which we use to measure risks and scenario plan different possible interventions. Our digital preservation techniques and policies follow current good practice, as recognised nationally and globally. Our overall approach involves assessing risks to render-ability (our ability to keep records and produce them in a usable form) and intellectual control (our ability to understand what they are). We act to mitigate these risks.

Our digital preservation systems provide secure, resilient archival storage to ensure the integrity of the original digital objects ('bit preservation'). Our work with DROID and PRONOM provides the international digital preservation community with the ability to identify file formats, a prerequisite for understanding which files are at risk of becoming unfit for presentation. Should a format be identified as posing a risk, action can be taken to migrate records to a more durable format or to otherwise mitigate

that risk ('active preservation'). The National Archives maintains the original manifestation of the record as accessioned. We create digital surrogates for access.

We also routinely harvest digital public records from the web. The UK Government Web Archive collection is a thorough and high-quality capture of published public records. We harvest material from government websites, Public Inquiry websites, and official channels on social media services. A significant proportion of this collection is not held by other archives.

8c) Access

Details of the records we hold can be obtained through our online catalogue, Discovery. All open records are available for viewing by members of the public and can be viewed free of charge on site at Kew or copies can be requested for a fee. Generally, digital copies of some of our open documents are also available for download from our online services – some may be downloaded free and some for a small fee. A brief registration process is required to consult original documents on site; this is not required to view surrogates or online copies of documents.

In a normal year, access to the records is provided in a number of ways, both on site and online. Original documents on site are accessed by readers or staff under controlled conditions, in accordance with nationally recognised and agreed standards.

Readers use the document reading room and the map and large document reading room to consult original documents. In some cases, valuable or fragile material may only be consulted under supervision either within the conservation studio or in the invigilation room.

There are ongoing projects to catalogue more of our heritage assets, many using volunteers to further improve access to records and we have a dedicated catalogue team responsible for this.

9. Trade and other receivables

	2024-25	2023-24
	£000	£000
Amounts falling due within one year:		
Trade receivables	1,164	1,335
Deposits and advances	26	20
VAT	83	_
Prepayments	1,573	1,168
Accrued income	3,922	2,808
Total trade and other assets	6,768	5,331
Contract assets	-	-
Total receivables falling due within one year	6,768	5,331
Amounts falling due after one year:		
Prepayments	168	388
Total receivables	6,936	5,719

10. Trade and other payables

	2024-25	2023-24
	£000	£000
Amounts falling due within one year:		
Other Taxation, Social Security and Pension	1,345	1,176
VAT	-	399
Trade payables	1,072	2,360
Accruals	2,088	1,759
Deferred income	658	120
Deposits	12	12
Short-term staff benefits (holiday pay accrual)	1,101	961
Amounts issued from the Consolidated Fund for supply but not spent at year end	1,279	1,629
Total trade and other liabilities	7,555	8,416
Contract liabilities	119	131
Lease liabilities	552	525
Total payables falling due within one year	8,226	9,072
Amounts falling due after one year:		
Contract liabilities	199	194
Lease liabilities	6,011	6,406
Total payables	14,436	15,672

See Note 7 for details of amounts due under Lease Liabilities.

11. Other financial commitments

The National Archives has no capital commitments (2023-24: £nil)

The National Archives has entered into significant noncancellable contracts (which are not leases or PFI contracts) for a facilities management service and IT Services. The payments to which The National Archives is committed, analysed by the period during which the commitment expire are as follows:

Future financial commitments	2024-25	2023-24
	£000	£000
Not later than one year	1,616	1,810
Later than one year and not later than five years	781	193
Beyond five years	-	-
Total	2,397	2,003

The facilities management contract (£974k) has been extended until August 2025. No further contract has been entered into beyond that point.

A new contract for Microsoft licences (£1.01 million) has been entered into which will last until August 2027.

12. Future income due under non-cancellable operating leases

The National Archives has entered into contracts to rent sections of the building to third parties. The aggregate minimum lease receipts are as follows:

Future lease income	2024-25	2023-24
	£000	£000
Receivable within one year	192	228
Receivable later than one year and not later than five years	208	133
Total	400	361

13. Financial instruments

As the cash requirements of The National Archives are met through the Estimates process, financial instruments play a more limited role in managing risk than would apply to a non-public sector body of a similar size. The majority of financial instruments relate to contracts to buy non-financial items in line with The National Archives' expected purchase and usage requirements and The National Archives is therefore exposed to little credit or liquidity risk.

14. Contingent liabilities

There were no material contingent liabilities at the reporting date (2023-24: nil).

15. Related party transactions

The National Archives is a non-ministerial department of the UK Government. Its sponsor department is the Department for Culture, Media and Sport. The Chief Executive, whom during the reporting year was Dr Jeff James CBE until 28 July 2024 and Saul Nassé from 29 July 2024, reports to the Secretary of State.

The National Archives has had a number of transactions with other government departments and other central government bodies, throughout the year. At 31 March 2025, The National Archives was owed the following: £302 by Department for Business and Trade (2023-24: £7,676), £465 by Government Legal Department (2023-24: nil), £210,800 by House of Commons (2023-24: 203,000), £110,223 by House of Lords (2023-24: nil), £653 by Ministry of Defence (2023-24: nil), £3,437 by Ministry of Justice (2023-24: £6,704), £261,684 by Northern Ireland Assembly (2023-24: nil) and £16,256 by Northern Ireland Office (2023-24: nil).

The National Archives had transactions with the following bodies with which Board members have declared an interest. These are not considered to meet the definition of a related party under IAS 24 but are included for transparency.

Nigel Baker, Non-executive Board member, is also chair of the Sky News Board. Sky News was a customer of The National Archives during the year purchasing £720 of goods and services.

Alison White, Independent member of the Audit and Risk Committee, also sits on the Defence Audit and Risk Assurance Committee for the Ministry of Defence as well as being a non-Executive Director. A significant programme is currently underway to transfer the MoD service personnel records to the custody of The National Archives.

There are no further outstanding balances owed to or owed from any of the above related party organisations.

The Remuneration and staff report (page 110) contains details of payments made to key personnel.

16. Events after the reporting period date

There have been no significant events after 31 March 2025 that require adjustment to, or disclosure in, the financial statements.

These accounts have been authorised for issue by the Accounting Officer on the same date as the Comptroller and Auditor General's Audit Certificate.

4.0 Annexes and Appendix

Annex A: Advisory Council on National Records and Archives: 22nd Annual Report 2024-25

Foreword by Sir Geoffrey Vos, Master of the Rolls

To the Right Honourable Lisa Nandy MP, Secretary of State for Culture, Media and Sport

I am pleased to present the 22nd Annual Report of the Advisory Council on National Records and Archives.

The Council has had a busy and varied year. Its workload has increased in a number of areas. In particular, the transfer of large numbers of Ministry of Defence service personnel records to The National Archives has presented challenges to both The National Archives and the Council, which advises The National Archives on issues affecting public access.

There has also been increasing demand on the Council to provide panels to apply the public interest test to requests made for the disclosure of records under the Freedom of Information Act (FOIA) 2000. The National Archives has worked incredibly hard to deliver these panels. The

panels made up of Council members routinely respond to the requests within one working day. This has been a significant achievement.

The Council started the year with a visit to the Foreign, Commonwealth and Development Office (FCDO) in Milton Keynes. During the visit, Council members discussed how they could work more effectively with the FCDO in relation to its vast number of records. New issues are arising every year as more and more born-digital records come to be considered for transfer to The National Archives. Council members also discussed how new technologies could be used more effectively to assist both departments and the archive sector alike.

The Council's subcommittee, the Forum on Historical Manuscripts and Academic Research (the Forum), has provided expert advice on important archives offered to national museums and institutions under the Acceptance in Lieu of tax scheme. The Forum has enabled several collections of historic archives to remain accessible to both the public and to the research community. In addition, the Council was delighted to receive, via the Forum, the first report from the Manorial and Tithe Documents Panel (chaired by Professor Mark Bailey). This report provides most valuable assistance on the assessment of manorial documents and records

During the year, six of the Council's most active members retired. They were Dr Helen Forde, Dr Peter Gooderham CMG, Mr Stephen Hawker CB, Mr Phillip Johnson, Mr Martin Uden CB and Mr John Wood. I want to pay tribute

to the magnificent contribution to the work of the Council that each of these members made. We also bade farewell to two of our Independent Forum members, Dr Adele Redhead and Ms Jenny Shaw, whose considerable knowledge of the academic and archival sectors will be missed. The Council is hugely grateful to its retiring and current members for their dedicated services.

Finally, I am delighted to report that seven highly qualified new members of Council and two equally well-qualified new independent members of the Forum are now joining us. We look forward to getting their fresh perspectives on all areas of the Council's work. I am looking forward to working with them in the years to come.

(Tee) In

The Right Honourable Sir Geoffrey Vos The Master of the Rolls 19 May 2025

Introduction

The Advisory Council on National Records and Archives (the 'Council') is an independent advisory body, created under the Public Records Act 1958 and exercising statutory functions under that Act. It advises the Secretary of State for Culture, Media and Sport (the 'Secretary of State') on issues relating to public records that are over 20 years old (historical public records), including public access to them, at the point of transfer to The National Archives. It also advises the Secretary of State in deciding on requests from Government Departments for historical public records to remain closed under certain FOIA exemptions and challenges them to provide evidence to justify such requests.

Through its sub-committee, the Forum on Historical Manuscripts and Academic Research (the 'Forum'), the Council advises the Chief Executive of The National Archives in his capacity as Historical Manuscripts Commissioner on matters relating to independent (non-governmental) archives outside the public records system.

The Manorial and Tithe Documents Panel (the 'Panel') is a further sub-committee of the Forum, comprised of subject-matter experts. It advises the Master of the Rolls and the Historical Manuscripts Commissioner on matters relating to Manorial and Tithe documents.

The Council's, the Forum's, and the Panel's respective remits, as well as their Terms of Reference, are described

in more detail on The National Archives' website <u>www.</u> <u>nationalarchives.gov.uk/about/our-role/advisory-council</u>.

The Advisory Council's work in 2024-25

The Council has continued to work with departments across government to develop good working practices and standards. In 2023, we began to focus on the application of Section 37, which includes exemptions from Freedom of Information (FOI) disclosure for communications with members of the Royal Family and Household. We have been keen to see improvements in the timeliness of departmental consideration of some such cases. We continued this conversation in 2024-25, including with our sponsoring department, DCMS. We also began looking at the application of Section 41 (information provided in confidence) to Royal Family and Household cases. We will continue this work in 2025-26.

The Council has heard from several departments in attendance at their quarterly meetings and has offered support and scrutiny of records management plans where appropriate. Similarly, the Council has continued to work with departments to streamline processes with the use of checklists, usually revised on an annual basis, to enable a quick reference system for members when considering applications.

In the spring of 2024, the Council continued its file 'spot checks' which allow an opportunity for assurance regarding the application of departmental exemptions to records.

Council was pleased to note the report drafted by members who viewed the records and obtained reassurance that, based on this selection, exemptions were being applied in a considered and appropriate way.

Meetings

The Council held four formal meetings in May, July and November 2024 and in February 2025. Members held an additional strategy session online in September 2024 where they discussed the application of the criteria for departments retaining historical documents rather than transferring them to The National Archives, artificial intelligence use in archival practice and The National Archives' progress on accessioning military personnel records.

The Council's meetings were attended by members, as well as by Dr Jeff James CBE, The National Archives' Chief Executive and Keeper of Public Records until July 2024. In November, the Council welcomed Mr Saul Nassé to his first meeting as the new Chief Executive and Keeper of Public Records at The National Archives. Other representatives from The National Archives who possess expertise relating to the issues considered by the Council also participated as necessary.

The Advisory Council's Working Group met four times in 2024-25 to devote more time to discussion on specific issues. Such topics included the Council's Annual Report, succession planning, and the spot check of files conducted by Council members in the spring.

In addition to the Council meetings, members took part in Freedom of Information Panels. Though not meetings as such, they represent a significant amount of dedication from members who share the demand equally between them. In 2024-25, members completed 37 panels.

Engagement with departments

Under the Public Records Act, government departments, arms-length bodies and places of deposit have a statutory duty to transfer their public records to The National Archives. From time-to-time, this cannot be completed before the statutory deadline and the relevant body must apply to the Council to retain their records. Typically, public bodies apply for between one and five years of retention, and the Council only grants long periods by exception after significant scrutiny. The Council then makes its recommendation to the Secretary of State, who makes a decision on whether to grant the application based on this advice.

During 2024-25, the Council considered 1,076 applications for retention from public bodies. The Secretary of State accepted the Council's advice on the applications for retention they received.

As part of the Council's work to support departments in transferring records, it will request relevant updates from departments. This can either be through a written update, or an update where the department appears before the Council to discuss their records and processing plans in greater detail. Updates can include information on

the support a department has in place, timescales and methods for processing these records, and details on the types of records. Throughout 2024-25, Council received a total of 32 updates from across government departments, arms-length bodies and Places of Deposit.

Freedom of Information Panels

Freedom of Information Panels are comprised of three members of the Advisory Council, assigned on rotation. During the financial year 2024-25, 37 panels were convened, with 740 cases being considered. Panels substantively challenged 68 of these, or 9% of the total. This compared to 820 cases in 2023-24, where 117 cases were substantively challenged (13%).

The most commonly challenged exemption was Section 38(1)(a) (health and safety) (32 times) while section 27(1) (international relations) was second-most challenged (18 times). These challenges are consistent with those of 2023-24. A further breakdown of Freedom of Information Panel statistics can be seen in Appendix C.

The Forum on Historical Manuscripts and Academic Research

In 2023, Forum members had received the annual Sales Monitoring Report which is prepared annually by The National Archives' Archive Sector Leadership team. Forum members have chosen to make it a standing item on their schedule and so received the 2023-24 report at their June 2024 meeting. The report again provided an excellent

source of discussion for members and is a valuable resource for archives and archive professionals.

The Forum visited the M&S Archives in Leeds in October 2024 which was an excellent experience, and an opportunity for members to understand a unique business model for a private archive. The staff provided a tour of the collections which Forum members greatly appreciated, as well as facilitating the Forum business meeting. At this meeting the Forum discussed its priorities for 2025-26 which were agreed, and first two addressed, at its March 2025 meeting. The agreed priorities were as follows: volunteer/community activity in archives, new ways of collecting/forming archives, sales monitoring and new acquisitions, engaging with and supporting private archives, ethical and practical considerations concerning archives and collecting, and access to (private) archives, models of access, and ways of engaging with the public. The Forum members and National Archives staff would like to reiterate their thanks to the M&S Archives team for hosting them so expertly.

The Forum has again been proactive in asking guest speakers to attend their meetings. This year, members have heard guests discuss the Our Heritage, Our Stories project, The National Archives' annual archive sector survey, and risks to charity archives. Hearing directly from the archive sector enables Forum members to continue to develop their understanding across the spectrum of issues affecting archives nationally, and they will continue to invite sector colleagues to meetings throughout 2025-26. The

Forum would like to convey their gratitude to all those who have spoken at their meetings over the past year.

In 2024 the Manorial and Tithe Documents Panel (the Panel), a sub-committee of the Forum, held its first meeting. A subsequent meeting in January 2025 took place at Lambeth Palace Archives which provided an opportunity for Panel members to advise the Palace archivist on whether a range of nineteenth-century documents in their collection fell within the Manorial Documents Rules. This process highlighted the need for the creation of a checklist to help archivists throughout England and Wales to make basic assessments of whether documents were manorial or tithe. The Panel aims to assist the sector in this area by drafting a checklist in 2025.

Administration and governance

Membership

The Council is chaired by the Master of the Rolls, Sir Geoffrey Vos, and Mr David Rossington CB is the Deputy Chair. Members generally serve two four-year terms on the Council and are appointed through the Public Appointments process. The total membership of the Council is currently seventeen, including the Chair. Biographies can be found for the members on our pages on The National Archives' website: www.nationalarchives.gov.uk/about/our-role/advisory-council/membership/.

The Forum is also chaired by the Master of the Rolls, Sir Geoffrey Vos, and Professor Leon Litvack is the Deputy

Chair. The Forum must contain at least three Advisory Council members, as well as three Independent members. Over 2024-25, a recruitment exercise was undertaken for two new Independent members as Dr Adele Redhead and Ms Jenny Shaw approached the end of their terms. Two of the Forum's Advisory Council members, Dr Helen Forde and Mr Stephen Hawker CB, also stepped down as they came to the end of their terms on the Council. These four vacancies will be filled early in 2025-26.

All members are required to keep the Advisory Council Secretariat advised of any declarations of interest. If applicable, members that have a declared interest in items on the Council meeting agendas are required to recuse themselves from taking part in the discussion. A list of members' declarations can be found on The National Archives' website: www.nationalarchives.gov.uk/about/our-role/advisory-council/membership/register-of-interests/.

Remuneration

Remuneration for the Council members, excluding the Master of the Rolls, was approved and introduced on 1 April 2019 and is provided by the Department for Culture, Media and Sport. Members are remunerated at a rate of £386 per day to a maximum of £9,264 per year. The Council remuneration for 2024-2025 totalled £101,808.

Freedom of Information requests

As a public body, the Council is subject to the FOIA itself. In 2024-25, the Council received fourteen FOI requests, twelve of which were responded to within the statutory

timeframe as required by the FOIA. Two of the requests were responded to outside of the statutory timeframe as they required extensive consultation with third parties.

Sustainability

The Council as a body is reliant on larger bodies to provide most of its support services but seeks to increase its sustainability wherever possible. The Council continues to operate with a paperless system for its work and deals with all information digitally. The transition to hybrid meetings also has sustainability implications as it facilitates easier attendance from Government Departments.

Looking ahead

The year 2025-26 looks likely to produce a continuation of current work levels, as we predicted in 2024-25. We expect the number of 'born-digital' records being transferred to The National Archives will continue to present challenges for departments and will work with them to manage these. We shall continue to monitor technological developments and adaptations that could assist in this area of work, particularly around artificial intelligence.

Members of the Forum will consider their priorities across their 2025-26 meetings and look forward to hearing directly from sector colleagues. They also look forward to a further offsite visit in the autumn of 2025, allowing for valuable insight into practical archival practice. One particularly important area of work over the coming year will be to welcome and integrate our seven new Advisory Council members and our two new Independent Forum members into their roles. We have enjoyed meeting them and welcoming them to their first meeting and will continue to support them as they develop their understanding of the work of the Advisory Council and the Forum.

Gently

The Right Honourable Sir Geoffrey Vos The Master of the Rolls 19 May 2025

Appendix A – The Remit of the Council, the Forum and the Panel

The Council

Background

The Advisory Council on National Records and Archives was established by the Public Records Act 1958 and is a non-departmental public body. It is chaired by the Master of the Rolls, The Right Honourable Sir Geoffrey Vos, who was appointed with effect from 11 January 2020.

The role of the Council

The Council is to consider and advise on matters including:

- applications from departments for the retention within those departments of public records beyond the age of 20 years, when those selected for permanent preservation are normally transferred to The National Archives,
- the balance of the public interest in relation to applications from departments for the extended closure of historical public records and other "matters relating to the application of the FOIA to information contained in public records that are historical records within the meaning of Part VI of that Act",
- the balance of the public interest in the release or nondisclosure of historical records, an application for the disclosure of which has been made under the FOIA,

 the preservation of public records in places of deposit and facilities for public access to them.

Requests under FOIA in accordance with the third bullet point are dealt with through the FOI panel process.

In addition, the Council may be required to advise on:

- major objectives, programmes and policy changes for The National Archives,
- proposed legislation affecting The National Archives,
- the implications for records and public services of any proposed change to the status of The National Archives, and/or
- any subject brought to its attention by the Secretary of State.

As its name suggests, the Council's role is advisory. Accordingly, the Council does not:

- make the final decision as to:
 - whether records are transferred to The National Archives closed (i.e. not available for public access), nor
 - when a closed record is reviewed after transfer, it should remain closed as these decisions lie with the department whose records they are,
- make the final decision on whether a record can be retained by a department. This decision is made by the Secretary of State for Culture, Media and Sport,

- advise on departments' retention of records under the Security and Retention Instrument 2011, nor
- review departments' decisions on the selection of their records for permanent preservation as this falls under the remit of the Keeper of Public Records.

The Forum

The Council's responsibility relating to historical manuscripts (private archives) is discharged through the work of its sub-committee, the Forum on Historical Manuscripts and Academic Research. The Forum advises the Keeper of Public Records in his capacity as Historical Manuscripts Commissioner. The Forum considers and provides advice to the Secretary of State through the Council on matters relating to manuscripts, records and archives, other than public records, and particularly:

- the location, collection, care, custody, preservation, acquisition, sale, and use in all formats of such documents,
- the compilation and dissemination of information about them,
- any questions affecting such documents as may be referred for its consideration, including issues relating to the statutory duties of the Master of the Rolls in respect of manorial and tithe documents, and the making of recommendations to Arts Council England on the

- allocation of archives and manuscripts accepted for the nation in lieu of tax, and
- other issues that would formerly have come within the terms of reference of the Royal Commission on Historical Manuscripts.

In addition, on behalf of the Council, the Forum is to:

- act as a vehicle for the development of constructive and collaborative engagement between The National Archives and its academic stakeholders, sharing knowledge and developing trust and understanding, and
- provide an open, independent and authoritative advisory voice to The National Archives, to support its research and academic liaison.

The Manorial and Tithe Documents Panel

Since 2003, when the Public Record Office and the Historical Manuscripts Commission came together to form The National Archives, the Council has also had a remit to advise the Historical Manuscripts Commissioner (as appointed under the terms of the 2003 revision of a Royal Warrant of 1869, which first established the Historical Manuscript Commission) on all matters relating to records and archives outside the public records system. The subcommittee fulfilling this remit is the Forum on Historical Manuscripts and Academic Research.

The Master of the Rolls, Chair of the Forum, has responsibilities for manorial and tithe documents and to advise the Historical Manuscripts Commissioner on

matters relevant to these records. The Master of the Rolls is advised in this capacity by the Manorial and Tithe Documents Panel (the Panel), which sits as a subcommittee of the Forum.

Appendix B – Freedom of Information panels and processes

The Council acts on behalf of the Secretary of State, to consider the balance of the public interest in the release or non-disclosure of information contained in transferred historical records that engage qualified exemptions (only), when an application has been made to The National Archives under section 66 of FOIA for the disclosure of information held by it. The Council exercises this responsibility through the convening of panels of three members to consider up to 20 requests at a time.

Records retained by departments and those closed at transfer to The National Archives remain subject to the FOIA and individuals can make a request under FOIA (an 'FOI request') to have access to them.

When The National Archives receives a FOI request for access to closed information held by it, it follows the procedure set out in Part VI of FOIA. Under these provisions, before a request can be refused on the grounds of a qualified exemption, the Secretary of State must be consulted. The Council will assess the public interest test, which is necessary before such an exemption can be applied. This test is applied to determine, whether, in all the circumstances of the case, the public interest in disclosure is outweighed by the public interest in refusing access to the information in the record.

For this purpose, panels of three members of the Council are convened to consider the public interest in the release or non-disclosure of the requested information. (The Council has no advisory role when a request is to be refused citing only absolute exemptions.)

In most cases, the FOI request concerns information closed at transfer on the grounds that it was information:

- that, if released, would endanger the safety or physical or mental health of an individual,
- that, if released, would damage international relations, or
- relating to law enforcement.

Cases are carefully scrutinised and debated by panels on the basis of a fresh assessment by the department of the arguments for and against disclosure, taking account of any change in circumstances since the access status of the record was last considered.

If they consider it necessary, panel members will request further detail or clarification from the relevant department or The National Archives. Even where they are in agreement that the public interest in disclosure outweighs the public interest in applying the exemption, members of the panel may also raise concerns about departmental practices and draw attention to inconsistencies between departments in their handling of FOI requests.

Appendix C – Metrics

Closure and retention

When departments intend to transfer their public records to The National Archives under condition that some sections and/or the whole record are redacted or withheld from public access, this comes to the Advisory Council's consideration by way of a Qualified Closure Application. Further information on these is provided in the table below.

Qualified Closure Applications

Year	Applications considered	Applications queried	Applications where clarification was received and accepted	Applications that were amended by departments and accepted	Applications withdrawn by departments following the Council's challenge	Outstanding closure applications
2021 – 2022	2,038	403	99	170	53	81
2022 – 2023	3,116	832	421	34	77	300
2023 - 2024	2,794	880	507	142	120	111
2024 - 2025	4,174	974	599	205	93	77

When departments apply to retain historical public records (records over twenty years old), this comes to Advisory Council's consideration by way of a Retention Application. Further information on those considered is provided in the table below.

Retention Applications

Year	Applications considered	Applications queried	Applications where clarification or amendment was received and accepted	Applications withdrawn by departments following the Council's challenge	Outstanding applications
2021 – 2022	734	77	66	3	8
2022 – 2023	1,315	150	61	15	74
2023 – 2024	670	257	236	10	11
2024 – 2025	1,076	209	179	23	7

Freedom of Information Panels

Total number of cases considered: 740 cases across 37 Panels.

Total number of substantive challenges to applications of the FOIA: 68 challenges.

These challenges resulted in three cases being opened in full and four being opened in part. The most commonly challenged exemption was Section 38(1)(a) (health and safety) (32 times) while section 27(1) (international relations) was second-most challenged (18 times). The challenges engaged the sections of the FOIA as follows:

- S27(1): 18 times
- S27(2): 4 times
- S31(1): 9 times
- S37(1)(b): 1 time
- S38(1)(a): 32 times
- S38(1)(b): 4 times

Annex B: Annual Report of the Independent Complaints Reviewer 2024-25

It is with pleasure that we present our seventh contribution to The National Archives' Annual report and accounts since our appointment as Independent Complaints Reviewers (ICR) in 2018.

ch&i associates, led by Alex Oram and Jon Wigmore, brings extensive expertise in complaint handling and investigations. Our experience includes serving as independent reviewers/investigators for bodies such as the Charity Commission, the PHSO, OFQUAL, the GMC, and the Public Service Ombudsman for Wales (PSOW). We currently provide independent review services for the Department for Transport, PSOW, the Fundraising Regulator, and The National Archives. Additionally, we investigate complaints of misconduct in political workplaces and those concerning NHS services.

At the third stage of The National Archives' complaints procedure, we offer an independent perspective on complaints that The National Archives has been unable to resolve internally, at no cost to customers. Our role is to:

 assess whether The National Archives has provided a reasonable service, consistent with its established policies and standards. In each case, we evaluate what occurred against what should have occurred, considering relevant frameworks, notably the Ombudsman's UK Central Government Complaints Standards.

- identify any deficiencies in the service provided to the customer, whether constituting maladministration or falling short of it, that warrant attention.
- recommend proportionate and appropriate remedies when service standards have fallen below an acceptable level.

The year's activity 2024-25

The National Archives sets itself high standards for service delivery and operates an ambitious complaints process designed to ensure that all customer feedback, regardless of its nature or expression, contributes to service improvement and effective resolution for individuals. The National Archive's commitments and principles in this regard are clearly articulated in its Policy for handling comments and complaints, which emphasises ease of access, clarity, timeliness, and fairness.

Over the past year, the number of complaints received by The National Archives has significantly decreased, from 92 to 63. This was primarily due to a reduction in complaints about the on site/visitor experience

This downward trend is also reflected in the number of requests referred to us, which reduced from 3 to 1. These figures are notably low considering The National Archives' substantial volume of transactions, which in the last year included:

- 486,486 document productions.
- 26,407 written enquiries (a considerable increase).
- 20,748 contacts via the online chat function (also an increase from the previous year).

Last year, we expressed our hope that The National Archives would actively encourage feedback of all types from customers at every touchpoint to increase its collection. We are pleased to report that while the number of formal complaints has decreased, The National Archives is receiving customer feedback in other forms at record levels (during our tenure). Suggestions and Comments totalled 592 (an increase of nearly 25% from the previous year), and 49 compliments were recorded (up from 31). Feedback categorised as a concern and/or criticism (as distinct from a formal complaint) also rose from 286 to 314. Additionally, The National Archives recorded 250 general enquiries, an increase of nearly 150%.

As in previous years, some of those making enquiries came directly to us. We have been consistently impressed and appreciative of The National Archives' customer service and complaints team for their swift assistance to those who contacted us without their issues having yet escalated to stage 3 of the complaint process. The Quality Manager's engagement with us and support of the review process has been of the highest standard. We do not doubt The National Archives' genuine commitment to customer service and the provision of independent review. And we again commend The National Archives for its efficient first-

stage complaint handling and its thorough, Chief Executive Officer (second) review stage. This, coupled with the quality of their core service, explains the very few stage 3 referrals we have received over the years.

As previously stated, we undertook one review for The National Archives during the year.

Denial of Appeals under The National Archives' Reclosure and Takedown Policy (the Policy)

The complaint: While acknowledging that The National Archives had upheld some aspects of her initial complaint at earlier stages of their complaint process, the Complainant ('C') alleged that The National Archives' refusal to allow her to appeal their decision to reclose certain records had not been adequately addressed.

The discrepancy in the Policy: C highlighted inconsistencies between The National Archives' explanation that the right to appeal reclosure was limited to those who requested the reclosure, and the wording of the published Reclosure and Takedown Policy on their website. While The National Archives had previously informed C that the discrepancy was due to a wording error, C pointed out similar wording used in response to an FOI request by another party. C suspected that the Policy wording had been deliberately altered following that FOI request, and then disregarded so that The National Archives could prevent her appeal.

Our View: Having carefully examined over 200 documents relating both to C's interactions with The National Archives

and the formulation of the Policy, we recognised why C's trust in The National Archives might have eroded due to how they had handled her appeals. However, regarding the central issue of the Policy, we concluded that the change of wording that occurred in April 2024 (making the appeal right appear more general) was likely a drafting error, not a deliberate act in response to the FOI request. We also found no evidence that The National Archives deliberately reversed a Policy change to block C's appeal. In reaching this conclusion, we noted that an FOI request serves a similar function to an appeal for someone seeking to reopen a closed record.

Conclusion: We acknowledged that The National Archives did not handle C's appeal and complaint according to their standards, for which they had already upheld aspects of her complaint. However, we did not uphold the aspect of C's complaint alleging a deliberate manipulation of the Policy.

Contact the ICR

Details of the ICR service can be found at: nationalarchives.gov.uk/contact-us/complaints-procedure/

ch&i associates Itd 64 Plumstead Road Norwich NR1 4JU

Telephone number: +44 (0)3301331492

Email: enquiries@chi-assoc.com

Appendix: Local places of deposit awarded New Burdens Funding 2024-25

Archifdy Sir Gar/Carmarthenshire Archives

Barnsley Archive and Local Studies

Bath Record Office

Bedfordshire Archives

Berwick Record Office

Birmingham: Archives, Heritage and Photography Service

Buckinghamshire Archives

Cheshire Archives and Local Studies

Cumbria Archive Centre, Carlisle

Derbyshire Record Office

Devon/North Devon Archives (South West Heritage Trust)

Dorset History Centre

Essex Record Office

Glamorgan Archives

Gloucestershire Archives

Gwent Archives

Hampshire Archives

Herefordshire Archive and Records Centre

Hertfordshire Archives and Local Studies

Kent History and Library Centre

Kresen Kernow (formerly Cornwall Record Office)

Lancashire Archives

Lincolnshire Archives

Liverpool Record Office

London Metropolitan Archives: City of London

Norfolk Record Office

North East Wales Archives, Ruthin (formerly Denbighshire Archives)

North Yorkshire County Record Office

Nottinghamshire Archives

Oxfordshire History Centre

Plymouth Archives, The Box

Powys Archives and Information Management

Royal Berkshire Archives

Somerset Heritage Centre (South West Heritage Trust)

Staffordshire and Stoke-on-Trent Archive Service

Surrey History Centre

Teesside Archives

The Story Durham (formerly Durham County Record Office)

Tyne and Wear Archives

West Glamorgan Archive Service

West Yorkshire Archive Service

Worcestershire Archive and Archaeology Service