



STAFFORDSHIRE POLICE AND CRIME COMMISSIONER

Capital Programme – Southern Area Custody

Final Internal Audit Report: 1.25/26

17 November 2025

This report is solely for the use of the persons to whom it is addressed.

To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party.



CONTENTS

Audit outcome overview 3

Summary of management actions 7

Appendices

Detailed findings and actions 9

Appendix a: Categorisation of findings 11

Appendix b Internal audit assignment opinions 12

Appendix D: Scope 13

AUDIT OUTCOME OVERVIEW

In line with our scope, included at Appendix C, the overview of our findings is detailed below.

Background / Why we did the audit

As part of the approved Internal Audit plan for 2025/26 we have performed a review of the quality of the data used to support the options appraisal for the Southern Area Custody. A Custody Briefing Paper was produced in June 2025 which, at a high level, identified the issues with custody capacity and six options to resolve them. The options were supported with performance data and estimated costs. This was followed by a presentation for the Chief Officer Team (COT) in July 2025 which included the core data used in the earlier paper.

The work completed by the Force represented the first stage in developing the project. Based on the RIBA Plan of Work definitive design and process management tool, the Force is at stage 0 which covers determining the best means of achieving the organisations requirements. Stage 0 requires a strategic definition of requirements and the collection of information that will support the review of possible solutions.

We have noted that the Force have contracted Pick Everard for support. They recommended that further exploration should be given to developing a new facility, including identifying its cost, location and operational requirements. As such, a multi-disciplinary consultancy team from Perfect Circle (led by Pick Everard) was appointed to undertake a first feasibility assessment for a new facility to serve the south of the County. The conclusions of the assessment were not ready at the time of this review, but when received will be considered through the Executive, and a decision made on whether to commission further RIBA stage workstreams.

Conclusion: Our review has confirmed that the Force has undertaken a reasonable process, given the very early stage of the project, to identify the issues and risks within custody as to capacity and to identify the costs related to the different options to resolve those issues and mitigate risks. However we have identified issues with the performance data used that would need to be rectified before moving forward to the next stage.

Internal audit opinion:



Minimal Assurance



Partial Assurance



Reasonable Assurance



Substantial Assurance

Taking account of the issues identified, the OPCC and Force can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).

Audit themes: **Our review identified the following issue resulting in one high priority management action:**

Performance Data

We attempted to reconcile the performance data within the June 2025 options paper to performance reports, but were not able to do so as the cut off period for extracting data for the options paper appeared to differ. For example the custody numbers and capacity differed, with the total number in the options paper at 12,255, but 17,260 in the performance report for July 2025. Also the figure for capacity in the options papers was 84% and in the performance report 85.3%.

We also considered the waiting time data, the options papers from June 2025 stated the data was for the period 1 March to 30 April 2025 although it included data for 23 weeks. We compared these figures to the July 2025 performance report which gave figures described as 23 weeks for the period 1 March to 30 June 2025, but we were not able to match figures between the reports.

There is a risk that discussions / decisions may be made based on inaccurate information and as a result the project will not achieve all the objectives expected. **(High)**

We found the following control areas to be adequately designed and operating effectively:

Estimated Building Costs

We reviewed the building and refurbishment costs associated with each of the options in the June 2025 options paper and the July 2025 presentation to the COT (Chief Officer Team) and confirmed these costs were consistent across both documents. We were advised that costs were based on professional knowledge and experience. For the new build options we were informed that guidance from Pick Everard was used. We reviewed that guidance and confirmed it was used both documents. We noted that the Pick Everard assessment was based on account data from current custody projects that they were managing and excluded any land costs and costs to bring services to the site. Whilst option C may require the purchase of land, and this has been highlighted, this has not been included at this point given it is an outline proposal, with more detailed costings to be provided at the next stage. As this project is at an early strategic stage in development, it is reasonable for estimates to be used before fully costing preferred options and the development of a draft business case.

Estimated Staffing Costs

We noted that additional staff costs had been calculated for each of the options that included an increase in capacity. We confirmed that the costings were consistent between the June 2025 options paper and the COT presentation in July 2025, we also confirmed there was consistency in how each option had been costed based on the number of additional cells and the number of sites. We were informed that these costings had been developed from existing pay budgets and received a copy of a budget summary confirming that the figures agreed with those used in both documents.

External Consultants

We obtained a copy of the COT Meeting paper dated 28 February 2025 where it recommended that Perfect Circle / Pick Everard were commissioned to explore the option of developing a new facility in the south of the County, including identifying its cost, location and operational requirements. It outlined that the monetary costs of this commission, and that it would be funded by the 'Custody Facilities - Professional Fees' budget in the capital programme. It outlined that both Finance and Commercial Teams were engaged in this decision and approved on 10 February 2025. We confirmed that following the COT meeting, a service request form / agreement was completed.

It was outlined that "This project is to support Staffordshire Police in developing the brief and location requirements for a new Custody facility. Existing provision to the South of County no longer meets the operational needs of the Force and Staffordshire Police are exploring options to develop a new

provision. This initial commission will be to work with the client team to develop a brief of requirements, undertake a site search, complete some high level site due diligence to inform site selection." The work was originally due to take place between 7 April 2025 and 30 June 2025. We also confirmed that there was a scope of service to support this commission.

Peer Review

We obtained a copy of the National Police Estates Group's (NPEG) Staffordshire Custody Review Report that was undertaken between 24 and 25 August 2021. Our review of the report confirmed that a review of Northern Area Custody Facility (NACF) and Watling Street Police custody estate was conducted. The scope and purpose of this report was to assess how the current custody facilities operate against the expectations of the Police Custody Design Guide (PCDG- standard number STD/Z/DG/078). This guide was the primary document used by project teams delivering new or refurbished Police custodial projects. The PCDG was developed over many years initially by the Home Office and latterly, the Ministry of Justice and NPEG.

Each site was reviewed as to whether it had all the facilities required as advised by the Police Custody Design Guide. The review highlighted any issues identified with a RAG rating to indicate their severity in terms rectifying. There was a particular focus on ligature points.

Custody Risk

A Custody Risk Review was undertaken by a Superintendent within the Force Contact & Operations Directorate. This paper was presented to the COT at their meeting on 8 November 2024. Review of the paper confirmed that it provided an assessment of the risk posed by Staffordshire Police's custody capability. When assessing the risk, five principle areas have been the subject of a high-level Strength, Weakness, Opportunity and Threat (SWOT) analysis. The 5 principle areas were:

- Detainees & Safer Detention;
- Police Personnel;
- Partners & Visitors;
- Business Continuity; and
- Estate.

Following this review it was concluded that having considered the principle risk areas, and reviewed Staffordshire Police's Risk & Issue Management Framework & Process the assessment of the risk posed by Staffordshire Police's custody capability was assessed to be high.

Further to this, the custody operations risk has been subject to continued review and monitoring at the Contact and Operations Board. There has since been three reassessments of the custody operations risk (19 February 2025, 19 March 2025 and 28 April 2025), all concluding that whilst further mitigations have been put in place, the risk score remained at 12.

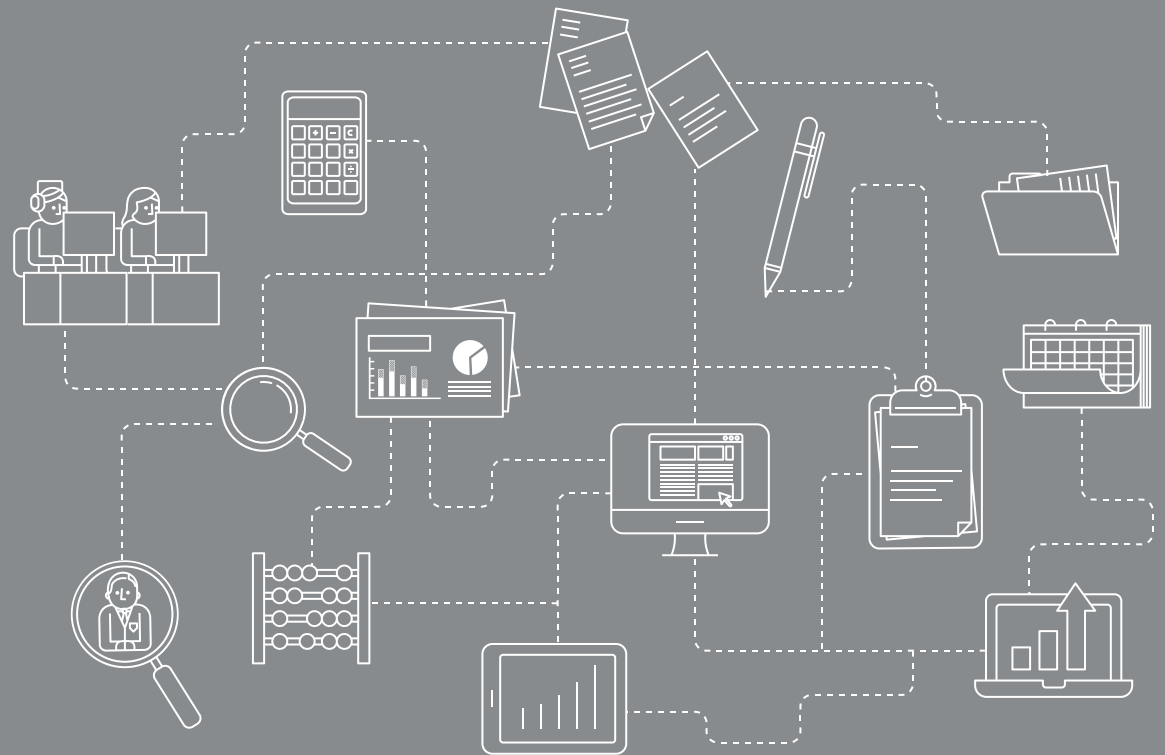
Capital Budget

We reviewed the medium term financial plan and precept report presented to the Police and Crime Panel in February 2025 and noted at that time provision had been made for the upgrades to both current custody (North and South) facilities. Budget had also been included for professional fees to review custody facilities to ensure they meet the longer-term requirements of modern policing. The report explained that the provision for refurbishment of the Northern area Police Custody was included for planning purposes only, as work was ongoing to refine this complex business case to ensure the custody is fit for purpose and meets industry standards.

We confirmed that the work described had commenced with the options papers, presentation and engagement of Pick Everard.

Summary of Actions for Management

01



SUMMARY OF MANAGEMENT ACTIONS

The action priorities are defined as*:

High

Immediate management attention is necessary.

Medium

Timely management attention is necessary.

Low

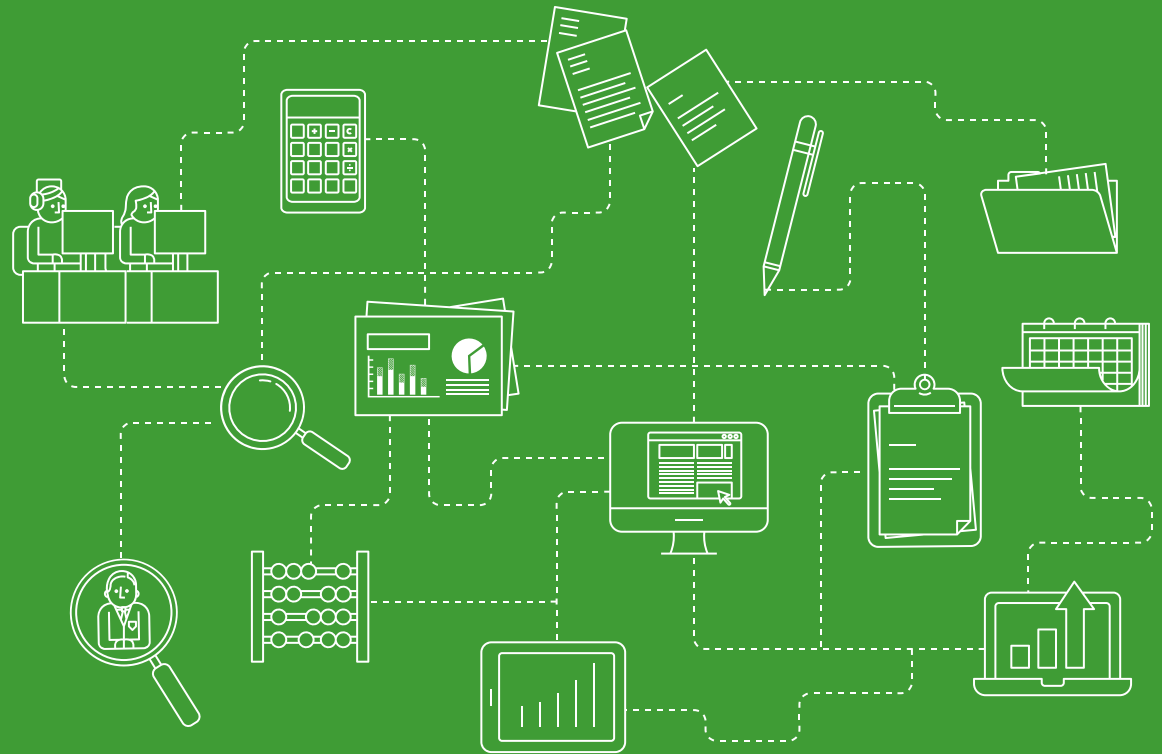
There is scope for enhancing control or improving efficiency.

Ref	Action	Priority	Responsible Owner	Date
1	The Force will ensure that the performance data recorded against each of the options reconciles with the source data. This will provide decision makers with assurance, ahead of a decision being made, that the information being used to inform their decision from the options available is accurate.	High	Custody and Criminal Justice Superintendent	31 March 2026 (Provisional Date - Subject to Business Case Finalisation)

* Refer to Appendix B for more detail

Detailed Findings and Actions

02



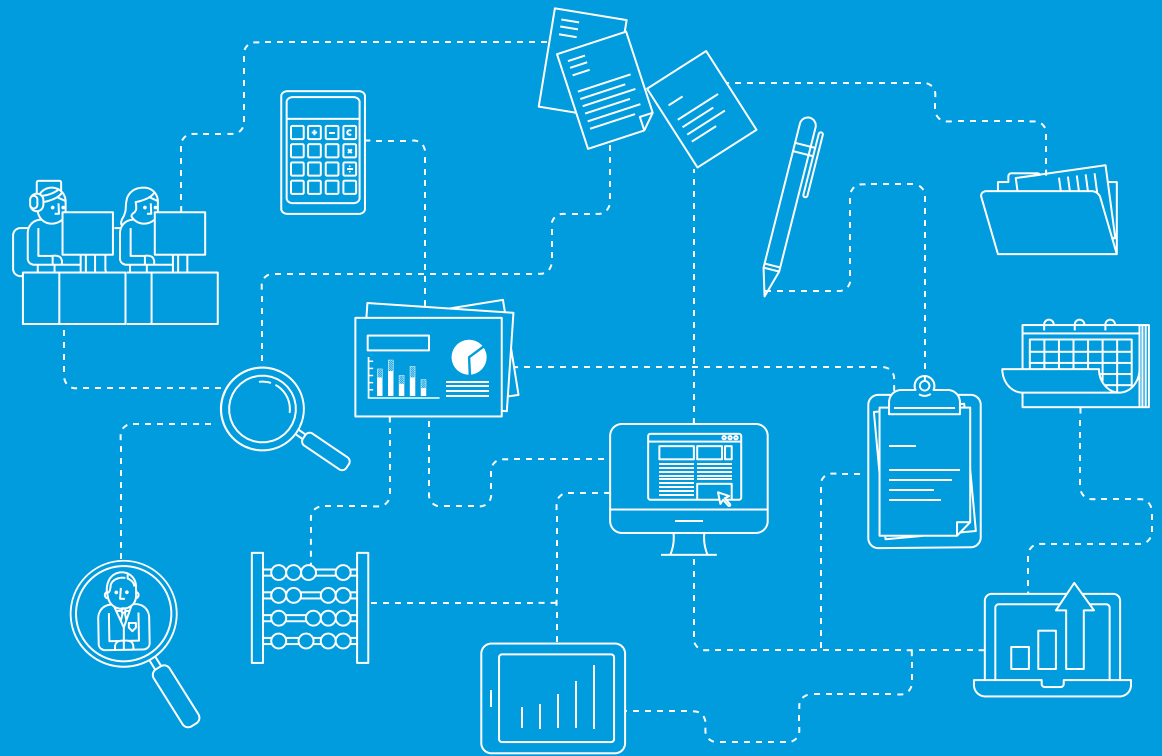
DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all audit testing undertaken.

Performance data				
Control	Data from Custody performance reports was used to support the analysis of options.			Assessment:
			Design	✓
			Compliance	×
Findings / Implications	<p>We attempted to reconcile the performance data within the June 2025 options paper to performance reports but were not able to do so as the cut off period for extracting data for the options paper appeared to differ. For example, the custody numbers and capacity differed, with total number in the options paper at 12,255, but 17,260 in the performance report for July 2025. In addition, the figure for capacity in the options paper was 84% and in the performance report 85.3%.</p> <p>We also considered the waiting time data, the options paper from June 2025 stated the data was for the period 1 March to 30 April 2025 although included data for 23 weeks. We compared these figures to the July 2025 performance report which gave figures described as '23 weeks' for the period 1 March to 30 June 2025 but were not able to match figures between the reports.</p> <p>There is a risk that discussions may be made based on inaccurate information and as a result the project will not achieve all the objectives expected.</p>			
Management Action 1	The Force will ensure that the performance data recorded against each of the options reconciles with the source data. This will provide decision makers with assurance, ahead of a decision being made, that the information being used to inform their decision from the options available is accurate.	Responsible Owner: Custody and Criminal Justice Superintendent	Date: 31 March 2026 (Provisional Date - Subject to Business Case Finalisation)	Priority: High

Appendices

03



APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Low
There is scope for enhancing control or improving efficiency.

Medium
Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.

High
Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non-compliance with controls*	Agreed actions		
			Low	Medium	High
Capital Programme – Southern Area Custody	0 (8)	1 (8)	0	0	1
Total			0	0	1

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B INTERNAL AUDIT ASSIGNMENT OPINIONS



Minimal Assurance

Taking account of the issues identified, the board cannot take assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Urgent action is needed to strengthen the control framework to manage the identified risk(s).



Reasonable Assurance

Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).



Partial Assurance

Taking account of the issues identified, the board can take partial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Action is needed to strengthen the control framework to manage the identified risk(s).



Substantial Assurance

Taking account of the issues identified, the board can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

APPENDIX D: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following risk

Objective of the risk under review	Risks relevant to the scope of the review	Risk source
This review will consider the quality of the data to support the options appraisal for the Southern Area custody proposal.	Custody Facilities	Strategic risk register

When planning the audit, the following were agreed:

Areas for consideration:

Staffordshire Police has two operational custody facilities. The Northern Area Custody Facility at Festival Park, Stoke-on-Trent has 50 cells, whilst the Southern Area Custody Facility at Watling Street, Gailey has 15 cells. The custody suite at Burton police station was closed in 2019 and remains a decommissioned site. Due to cell capacity issues, the Force is considering potential options to address the capacity challenges being faced. The options being considered are as follows:

- upgrade the Watling Street facility to accommodate more cells,
- Re-open and upgrade the Burton station, or
- commission a new building.

The Perfect Circle team, led by Pick Everard with their dedicated Blue Light Team is currently in the process of developing a high-level brief to determine both the best operational location for a new custody facility, and to estimate the size of site that would be required to meet operational needs and demands.

The focus of this review is to allow the Force and Commissioner to take assurance that the Force is managing the early-stage custody estate planning process effectively. We will review the options papers issued to the Chief Officer Team and consider:

- Rationale for considering each of the potential options including initial estimates of costs.
- Evidence of alignment with operational demand forecasts and strategic policing priorities.
- Use of data and modelling to inform capacity needs.

Limitations to the scope of the audit assignment:

- The scope of the work is limited to those areas examined and reported upon in the areas for consideration in the context of the objectives set out for this review;
- We will not confirm that the intended objectives and deliverables will be achieved for the Programme;

- This audit will not confirm that Value for Money will be achieved;
- We will not comment on any individual decisions made for the Programme, only that approval has taken place through the appropriate governance channels and supporting rationale has been maintained on file;
- Any testing will be completed on a sample basis;
- IT related controls are outside the scope of this audit;
- We will not confirm adherence to applicable legal and regulatory compliance requirements;
- The results of our work are reliant on the quality and completeness of the data and information provided to us; and
- The results of our work are reliant on the quality and completeness of the information provided to us.
- Our work will not provide an absolute assurance that material errors, loss or fraud do not exist.

Please note that the full scope of the assignment can only be completed within the agreed budget if all the requested information is made available at the start of our fieldwork, and the necessary key staff are available to assist the internal audit team. If the requested information and staff are not available, we may have to reduce the scope of our work and/or increase the assignment budget. If this is necessary, we will agree this with the client sponsor during the assignment.

To minimise the risk of data loss and to ensure data security of the information provided, we remind you that we only require the specific information requested. In instances where excess information is provided, this will be deleted, and the client sponsor will be informed.

Debrief held	24 October 2025
Draft report issued	28 October 2025
Responses received	17 November 2025
Final report issued	17 November 2025

Internal audit Contacts	Dan Harris, Head of Internal Audit Louise Davies, Managing Consultant
--------------------------------	--

Client sponsor	John Bloomer, Director of Resources ACC
Distribution	John Bloomer, Director of Resources ACC

We are committed to delivering an excellent client experience every time we work with you. If you have any comments or suggestions on the quality of our service and would be happy to complete a short feedback questionnaire, please contact your RSM client manager or email admin.south.rm@rsmuk.com.

FOR FURTHER INFORMATION CONTACT



Dan Harris, Head of Internal Audit

Email: daniel.harris@rsmuk.com

Telephone: 07792 948767



Louise Davies, Manager

Email: louise.davies@rsmuk.com

Telephone: +44 7720 508146

rsmuk.com

The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of Staffordshire Police and Crime Commissioner, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM UK Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

This report is released to you on the basis that it shall not be copied, referred to or disclosed, in whole or in part (save as otherwise permitted by agreed written terms), without our prior written consent.

We have no responsibility to update this report for events and circumstances occurring after the date of this report.

RSM UK Risk Assurance Services LLP is a limited liability partnership registered in England and Wales no. OC389499 at 6th floor, 25 Farringdon Street, London EC4A 4AB.