



CHIEF CONSTABLE FOR STAFFORDSHIRE

Vetting

Final Internal Audit Report: 5.24/25

31 January 2025

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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

We have undertaken a review of the Force’s vetting process to ensure the Force has a thorough and effective vetting regime in place, in line with the requirements of the authorised professional practices (APP) Vetting (March 2021) guidance produced by the College of Policing and the Code of Practice for Vetting (2023). As part of the review, we have assessed several control areas including the appeals process for unsuccessful applicants, reporting of performance measurements, appropriate user access restrictions to the vetting database and suitable processes have been implemented for transferees and re-joiners. In testing the vetting process, we have conducted extensive sample testing for all vetting types completed by the Force.


The Force are responsible for undertaking the vetting for all employees and for any contractors used by themselves or that have access to police systems. Non-Police Personnel Vetting levels are; NPPV 1; NPPV 2 abbreviated; NPPV 2 full; and NPPV 3. The vetting levels for officers and staff within the Force are; Management Vetting (MV); or Recruitment Vetting (RV).

To support forces in the completion of the vetting process, the College of Policing has released several guidance documents including the Authorised Professional Practice (APP) Vetting, the Vetting Code of Practice, and the National Decision Model (though the model is not exclusively used for vetting). We have conducted our testing, assessed the Force’s controls, and determined a level of assurance against the requirements within these guidance documents. The Force uses Core-Vet which is one of the primary vetting systems used by other forces across the country. It is worth noting that Staffordshire was one of the last force's to move over to the Core-Vet system, only moving over from Gatekeeper within the last 12 months. Within the system, the Force record any vetting checks completed, document the overall decision made and supporting rationale, and retain supporting evidence within the document section on the system.


The Vetting Team within the Professional Standards department are responsible for completing all vetting, with the Head of Professional Standards having overall responsibility. The Vetting Team is made up of the Head of Vetting who is supported by a team of Vetting Officers and Vetting Researchers.

Conclusion: We identified issues with compliance with the control framework in relation to Vetting. Whilst some controls were in place to ensure staff and non-police personnel are appropriately vetted prior to appointment, we identified areas in which the designed controls are not working as intended and improvements need to be made. We agreed **one high, three medium and one low priority management actions**.


Internal audit opinion:




Minimal Assurance



Partial Assurance



Reasonable Assurance



Substantial Assurance

Taking account of the issues identified, the Force 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).

Audit themes:



Vetting Checks:

For a sample of 20 clearances for new applicants as well as transferees from other forces, we confirmed that in all cases a research document evidencing the checks undertaken had been completed and retained on file on Core-Vet. However, we noted exceptions in five cases where not all of the required checks had been completed. These exceptions highlight a risk that the Force does not have sufficient controls in place to flag checks that have been missed in the vetting process. If checks are missed then there is a risk that applicants are granted clearance to access information that they are not adequately vetted for. **(High)**



Counter Terrorism Unit Checks:

CTU checks should be undertaken on the applicant as well as their associates for NPPV2 / RV level clearance, but the Head of Vetting informed us that Staffordshire Police make a conscious decision not to undertake these checks for NPPV2 / RV level clearance due to resource constraints. Whilst we note the resource constraints of the Vetting Team, it is important that they still consider whether the CTU check is needed for a RV and NPPV2 level clearance each time one is granted and that this is recorded. **(Medium)**



Documentation of Outcome and Rationale:

The outcome of the Vetting Team checks is documented within the Core-Vet system alongside the rationale for the decision in line with APP on Vetting and the National Decision Model. However, in two cases we identified that the clearance was recorded as granted but the rationale for granting was not explicitly recorded as no adverse information found. To maintain a robust audit trail to support decisions made, the rationale for granting clearance should be recorded. **(Low)** *Post Audit Update – we have been advised that this item has now been addressed, and all staff aware of recording requirements although testing has not been undertaken to confirm this.*



Appeals:

The Force have both an internal and external procedure to appeal vetting decisions. Our walkthrough testing confirmed that this procedure is being followed but currently the Vetting Team do not have a document to effectively track and monitor live appeal cases to determine compliance with timeframes, stipulated in the appeals procedures. **(Medium)** *Post Audit Update – we have been advised this item has now been addressed, a reporting function is available in CoreVet, although testing has not been undertaken to confirm this.*

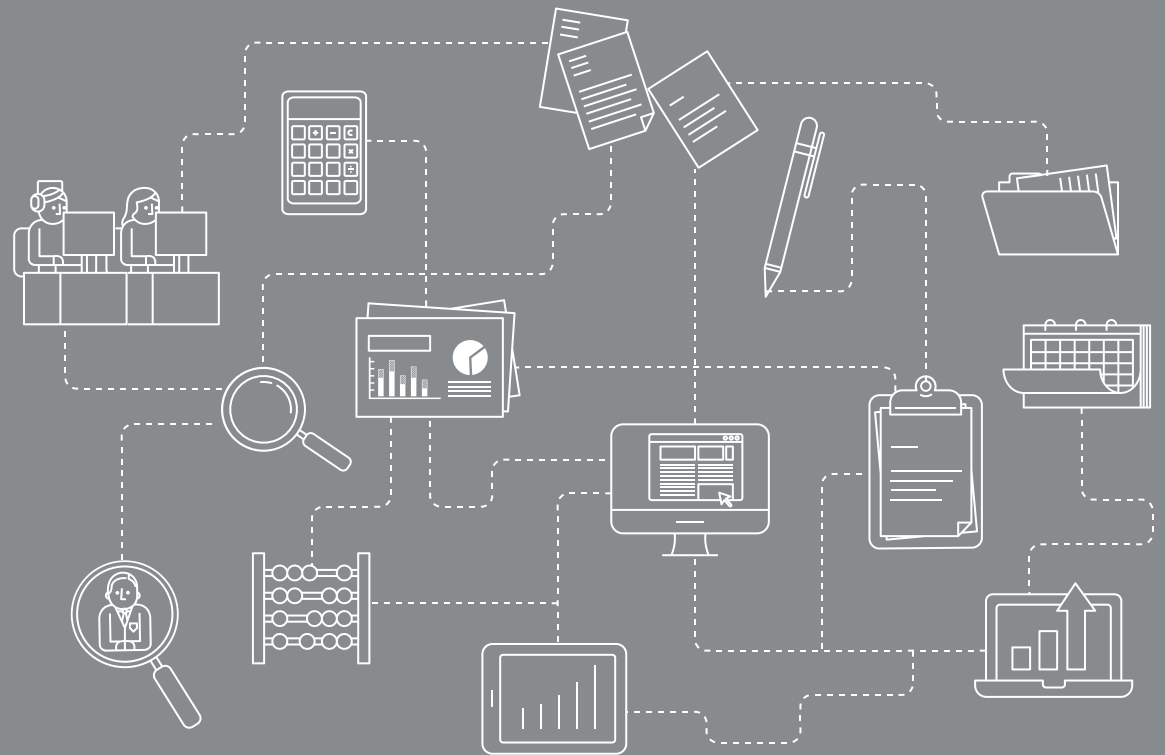


Post and Clearances listing:

The Force will investigate with Core-Vet developers whether post clearance reports that identified if staff have the correct level of clearance as well as expired vetting clearances can be generated from the Core-Vet system. **(Medium)**
A previous version of this document was provided to us but it was not fully completed and had not been updated since August 2023 as such it was not reflective of current arrangements.

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

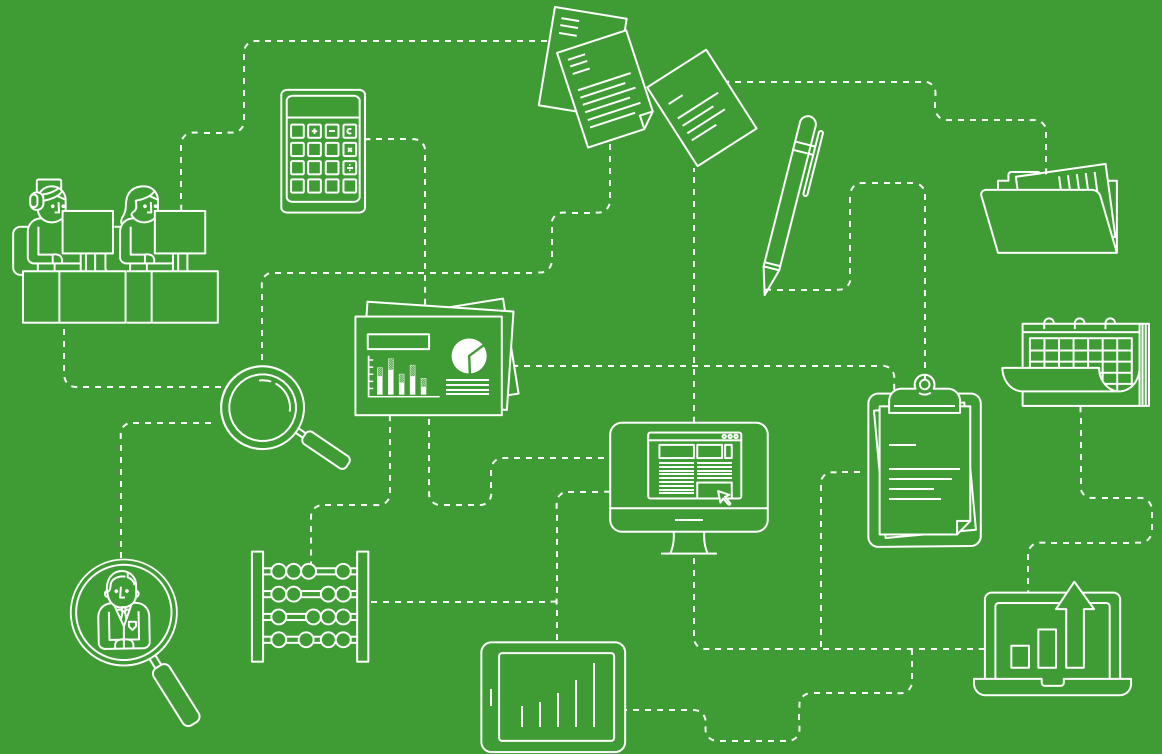
There is scope for enhancing control or improving efficiency.

Ref	Action	Priority	Responsible Owner	Date
1	<p>The Vetting Team will introduce a formal review process of the research document whereby a second member of the Vetting Team checks the research document back to the APP on Vetting to ensure that all necessary checks are undertaken.</p> <p>The Vetting Team will also investigate whether there is scope within the Core-Vet system for this flagging process to be automated and to block clearance being granted where all necessary checks are not completed.</p>	High	Head of Vetting	31 January 2025
2	<p>Consideration of whether a CTU check should be completed for RV/NPPV2 clearance should be documented within the research document held on Core-Vet.</p> <p>If the CTU check is not completed the rationale as to why should be documented.</p>	Medium	Head of Vetting	31 January 2025
3	<p>The rationale for granting clearance will be recorded within the status reason / conditions section of Core-Vet in all instances (including when no adverse information is found).</p>	Low	Head of Vetting	Complete
4	<p>The Head of Vetting will implement an appeals tracker so that the progress of vetting appeals in line with timeframes and the Standard Operating Procedures can be monitored.</p>	Medium	Head of Vetting	Complete
5	<p>The Force will work with Core-Vet to introduce functionality to the system that allows post and clearance reports to be run regularly which report on all nominal staff, the level of vetting they require, the level of vetting they have and whether their vetting clearance is in date.</p>	Medium	Head of Vetting	30 June 2025

* 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.

Area: Vetting Checks

Control	<p>The Vetting Team carry out the required checks for each clearance level in accordance with the College of Policing's Authorised Professional Practice (APP) on Vetting. These checks are documented in a research document to evidence they have been undertaken which is subsequently uploaded to the Gatekeeper (old vetting system) / Core-Vet (new system).</p> <p>The checks are usually undertaken by Vetting Researchers within the Vetting Team but can also be completed by Vetting Researchers within the Knowledge Hub. Where there are complexities, these can be escalated to Vetting Officers and/or the Head of Vetting.</p>	Assessment:	
		Design	✓
		Compliance	×
Findings / Implications	<p>In all cases sampled, we confirmed that a research document evidencing the checks undertaken had been completed and retained on file on Core-Vet. We did note one case where the most recent version of the research document had not been uploaded to Core-Vet in error, however, we confirmed that the most up to date version was completed and held on the r-drive.</p>		
	<p>Our testing noted the following exceptions:</p> <ul style="list-style-type: none">• In one case, the research document showed that checks on the applicant's son (over 10 years old) had not been completed. As per the APP guidance these should have been completed.• In one case, from review of the research document it appears that ACU / PSD / MoD checks on the applicant had not been completed despite the applicant previously working in the prison service. <p>These exceptions highlight a risk that the Force does not have sufficient controls in place to flag checks that have been missed in the vetting process. If checks are missed, there is a risk that applicants are granted clearance to access information that they are not adequately vetted for.</p> <p>From review of our sample, we noted that counter terrorism (CTU) checks were not undertaken in any cases where clearance was being sought to a Recruitment Vetting (RV) and NPPV2 level. Our review of the APP on Vetting highlighted that these CTU checks should have been undertaken on both the applicant, associated and third parties in order for this level of clearance to be obtained as such there is a risk that sufficient checks have not been undertaken for the level of clearance granted. We were informed by the Head of Vetting that this is a conscious decision not to undertake these checks for this level of clearance due to resource constraints.</p>		

Area: Vetting Checks

Whilst we note the resource constraints, it is important that there is still consideration as to whether the CTU check is needed for a RV and NPPV2 level clearance each time one is granted. This should be documented within the research document to support the rationale and the decision making process.

Management Action 1	<p>The Vetting Team will introduce a formal review process of the research document whereby a second member of the Vetting Team checks the research document back to the APP on Vetting to ensure that all necessary checks are undertaken.</p> <p>The Vetting Team will investigate whether there is scope within the Core-Vet system for this flagging process to be automated and to block clearance being granted where all necessary checks are not completed.</p>	Responsible Owner: Head of Vetting	Date: 31 January 2025	Priority: High
Management Action 2	<p>Consideration of whether a CTU check should be completed for RV/NPPV2 clearance should be documented within the research document held on Core-Vet.</p> <p>If the CTU check is not completed the rationale as to why should be documented.</p>	Responsible Owner: Head of Vetting	Date: 31 January 2025	Priority: Medium

Area: Outcome and Rationale

Control	<p>The outcome of Vetting team's checks (i.e whether clearance should be granted / refused) is documented within the Core-Vet system alongside the rationale for the decision in line with APP on Vetting and the National Decision Model.</p> <p>The level of clearance granted should be reflective of the checks undertaken and the posting of the individual vetted.</p>	<p>Assessment:</p> <p>Design ✓</p> <p>Compliance ×</p>
Findings / Implications	<p>Documentation of Outcome and Rationale:</p> <p>In 18/20 cases, we identified no exceptions as the outcome of the vetting (level of clearance granted) and rationale for the outcome in line with the APP on Vetting and National Decision Model was documented within the Core-Vet system. We did note that there was inconsistency about where this information was documented within Core-Vet, as where cases had been transferred over from Gatekeeper this information was sometimes documented within the notes or clearances section, but in other instances it was documented within the status reason / conditions section. However, for more recent cases where vetting was processed entirely in Core-Vet we noted there was consistency in that the rationale was documented within the status reason / conditions section, so these inconsistencies appear to be resolved. We also noted that when a detailed rationale was required for more complex cases this was uploaded as a supporting document.</p> <p>In the remaining 2/20 cases (MV/RV ref 5 and NPPV ref 4), we noted that the clearance was recorded as granted but the rationale for granting not explicitly recorded as no adverse information was found. As was found in the other cases reviewed, it is best practice to explicitly record the rationale for granting clearance even if there is no adverse information identified from the checks in order to ensure compliance with the APP on vetting. We have</p>	

Area: Outcome and Rationale

therefore agreed a management action.

Level of clearance granted:

In 19/20 cases, no exceptions were identified as the level of clearance granted and issued within Core-Vet aligned to what was required for the post / position. In the remaining cases (MV / RV ref 8), we identified that the post required MV clearance and according to the vetting form, research document and rationale the individual had been cleared to this level, but within Core-Vet they had only been granted clearance to RV level.

We were informed by the Vetting Officer that this was due to a known system issue that occurred when transferring clearances from the Gate-keeper to Core-Vet systems. As this is an issue the Force have already identified and are actively trying to resolve we have not raised further management action.

Management Action 3	The rationale for granting clearance will be recorded within the status reason / conditions section of Core-Vet in all instances (including when no adverse information is found).	Responsible Owner: Head of Vetting	Date: Complete	Priority: Low
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Area: Re-vetting of Transferees from other Forces

Control	Transferees from other forces are required to be fully re-vetted to MV / RV (depending on role) level with vetting form, evidence of checks and outcome/rationale for clearance documented within Core-Vet.	Assessment:	
		Design	✓
		Compliance	×
Findings / Implications	<p>For a sample of 10 transferees that joined the Force since 1 April 2024, we were able to confirm through walkthrough of Core-Vet that they underwent full vetting in the same way that any other joiner to the Force would undergo. We confirmed in all cases that the vetting form and research document were uploaded to Core-Vet to evidence the checks undertaken, and that the outcome and associated rationale were documented within the Core-Vet system.</p> <p>We confirmed in all cases that the level of clearance granted was reflective of the outcome of the vetting (including refusals) as well as post of the transferee.</p> <p>However, our testing of Transferees did highlight similar exceptions to our main RV/MV testing in terms of there being undocumented / missing checks that should have been completed:</p> <ul style="list-style-type: none">• In one case (ref 1), the transferee was being vetted to MV level as such CTU checks were required. From review of the research documented it appeared that these checks were in complete, but the Vetting Officer confirmed through review of their separate Counter Terrorism check records that they had been completed and in error the results had not been entered onto the research document;• In one case (ref 6), the transferee was being vetted to MV level as such CTU checks were required, but there was no record on the research document of these checks being complete nor on the CTU record as such it was deemed that this check had been missed in error;		

Area: Re-vetting of Transferees from other Forces

- In one case (ref 10), the transferee had previously worked for British Transport Police, Kent Police and Hampshire Police as such Anti-Corruption Units and Professional Standards Department checks were required from all the previous forces they had worked for, but according to the research document these checks had only been obtained from one force (Kent Police).

We also noted for transferees that were being re-vetted for RV level clearance that CTU checks on the transferees and identified associates / third parties were not undertaken in line with the APP on Vetting.

As with the exceptions previously identified, these exceptions relating to transferees also highlight a risk that the Force does not have sufficient controls in place to flag checks that have been missed in the vetting process. If checks are missed, there is a risk that transferees are granted clearance to access information that they are not adequately vetted for. A more robust review process of vetting and research documentation may help to mitigate this risk, so we have agreed a management action.

Management Action	See management actions 1 and 2
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Area: Appeals process

Control	In line with the vetting appeals policy, appeals are heard by the Appeals Panel / Appeals Authority who makes the final appeal decision and there is adequate documentation to support this.	Assessment:	
		Design	✓
		Compliance	×
Findings / Implications	<p>We obtained a copy of the Vetting Appeals Panel SOP which outlines the process for internal appeals. Review of the SOP confirmed that it outlines the following information:</p> <ul style="list-style-type: none"> The Internal Appeals Panel is initiated for the consideration of appeals against a decision to withhold, withdraw or downgrade clearance for serving Staffordshire Police Personnel; The constitution of the Panel is the Executive Officer for relevant business area, Head of Professional standards (or deputy), Chief Superintendent Business Lead (or deputy) and Head of Vetting; The appellant will have the right to personal representation and may bring a Staff Association / Trade Union representative or Police Friend with them; The Panel will convene as soon as practicable following notification of appeal. An appeal bundle will be circulated to the panel members and appellant at least 7 days prior to the date of the Panel meeting by the Head of Vetting; and A written summary will be provided to the appellant as soon as practicable following the panel and a copy maintained on the vetting file. 		

Area: Appeals process

We obtained a copy of the Vetting Appeals SOP for external appeals which applies to individuals external to (i.e. not currently employed by or appointed to) Staffordshire Police whose application for vetting clearance has been declined. Review of the SOP confirmed the appeals process is outlined as followed:

- Where vetting clearance is declined, notification will ordinarily be sent to the subject by their sponsor, usually HR;
- The subject will be provided with the contact details for the Force Vetting Unit (FVU). On request, the FVU will provide as much information as possible to the subject relating to the reasons for the decision. The subject will also be provided with the Vetting Appeal Form to complete and return within 21 days;
- On receipt of the completed Vetting Appeal Form, a bundle will be forwarded to the Appeal Authority containing a summary report outlining the grounds for refusal and representations of the subject, the original decision rationale, the completed appeal form and any additional information to be considered, as necessary; and
- The Appeal Authority will consider the appeal as soon as practicable and notify the subject of the result.

We walked through an internal and external appeals case with Head of Vetting. In both cases, we confirmed that the appeals were handled in line with the relevant standard operating procedures with relevant evidence such as the decision of the original vetting outcome, appeal from applicant, appeal summary and appeal determination/outcome from the Appeals Panel (internal) / Appeal Authority (external) being retained on file on Core-Vet.

Through discussions with the Head of Vetting, we identified that the Force currently do not have an appeals tracker, as such there currently is not a robust way to monitor and track live appeal cases through to completion or if they are being completed in the timeframes stipulated in the standard operating procedures, as such we have agreed a management action.

Management Action 4	The Head of Vetting will implement an appeals tracker so that the progress of vetting appeals in line with timeframes and the Standard Operating Procedures can be monitored.	Responsible Owner: Head of Vetting	Date: Complete	Priority: Medium
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Area: Reconciliation of Clearances Issued

Control	A Post and Clearances list is maintained by the Vetting Team to monitor whether staff have the required vetting clearance. Vetting expiry dates differ depending on the vetting level and range from up to three years for NPPV1 to 10 years for MV vetting.	Assessment: Design Compliance	 ✓ ×
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Area: Reconciliation of Clearances Issued

Findings / Implications

We obtained a copy of the Posts and Clearance list maintained by the Vetting Team. Review of the list confirmed that it contained the following fields for each staff member:

- The level of clearance required;
- The level of clearance they had; and
- The expiry of clearance.

Our review of the spreadsheet identified that it was not fully completed as the clearance required column was not detailed for every staff member. We would also note that the spreadsheet was dated to 7 August 2023, so appears to be outdated and not reflective of current arrangement.

As the Force have now implemented the Core-Vet system, we would recommend that it is utilised to generate regular post and clearance lists that report on all nominal staff, the level of vetting they require, the level of vetting they have and whether their vetting clearance is in date. This will help to ensure that all staff members who are supposed to have clearance have it and identify any out-dated clearance that may need renewing.

Management Action 5

The Force will work with Core-Vet to introduce functionality to the system that allows post and clearance reports to be run regularly which report on all nominal staff, the level of vetting they require, the level of vetting they have and whether their vetting clearance is in date.

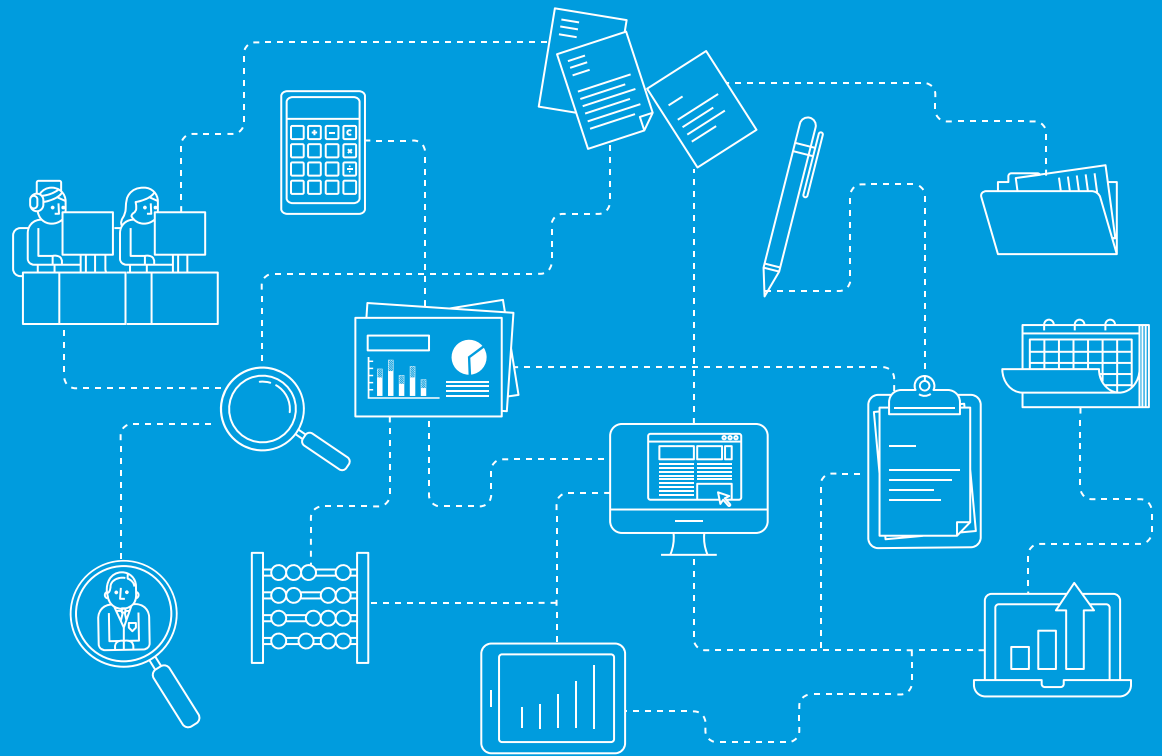
Responsible Owner:
Head of Vetting

Date:
30 June 2025

Priority:
Medium

Appendices

03



APPENDIX A: POST 1 APRIL 2024 VETTING APPLICATIONS

The following is an analysis of the average time taken and vetting status by vetting type of all vetting cases finalised since 1 April 2024:

Vetting type	Count of Vetting Level	Average of Days
MV	102	146
MV Healthcheck	21	231
MV/SC	7	130
NPPV1	18	143
NPPV2 Abb	105	146
NPPV2 Abb Healthcheck	1	230
NPPV2 Full	25	124
NPPV3	3	318
RV	270	98
RV Healthcheck	114	200
Grand Total	666	138

Vetting Type	Awaiting Vetting Decision - Biometrics	Vetting Discontinued	Vetting Granted	Vetting Refused	Vetting Withdrawn	Vetting Withdrawn - Candidate
MV		2	100			
MV Healthcheck			21			
MV/SC			7			
NPPV1		1	15	2		
NPPV2 Abb			98	7		
NPPV2 Abb Healthcheck			1			
NPPV2 Full			23	2		
NPPV3			3			
RV	4	14	217	28	2	5
RV Healthcheck			113			1
Grand Total	4	17	598	39	2	6

APPENDIX B: 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
Vetting	0 (13)	5 (13)	1	3	1
Total			1	3	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 C: 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 objective:

Objective of the risk under review

A review of the vetting arrangements in place for officers and staff, including checks required, to ensure that appropriate personnel are being recruited, in line with internal and external guidance.

When planning the audit, the following were agreed:

Areas for consideration:

- The APP Vetting, March 2021 and Vetting Code of Practice, July 2023 underpin the vetting process undertaken by the Force and is applicable to employed staff, volunteers and other non-police personnel.
- We will perform sample testing to confirm adherence with APP Vetting for RV (Recruitment Vetting), MV (Management Vetting) and NPPV (Non-Police Personnel Vetting) particularly in relation to:
 - o Checkable history and residency requirements / criteria;
 - o Minimum level of clearance is in place dependent on the post;
 - o Authentication - for a sample of NPPV applications, we will confirm that evidence of prior authentication from a sponsor (or similar) has been sought and that evidence of such authentication is retained; and
 - o An appropriate audit trail is maintained on the vetting system.
- Decision making is made in accordance with the National Decision Model and outcomes are recorded on the vetting system.
- An appeals process is in place and adhered to; this will be confirmed through sample testing.
- Review of vetting health checks completed for internal transfers.
- Vetting reviews take place when required and in accordance with the APP Vetting. We will consider how the Force is informed of changes in circumstances e.g misconduct hearing/meeting and the vetting reviews which are undertaken if the decision of misconduct is to issue a written warning or final written warning.
- An Annual Integrity Review process is in place for all Force staff members. As part of the review, the staff member will meet with their Line Manager and review any changes relevant to their vetting status and confirm familiarity with key policies and obligations.
- Access to the vetting database is restricted only to authorised individuals and access permissions are regularly reviewed for appropriateness.
- Performance measures based on SLAs are captured and reported through the governance structure of the organisation.
- We will consider the interface between the Vetting Departments and other key departments such as HR in relation to the communication of applicant information.

- We will use data analytics to confirm that all vetting held on the system is in date at the time of our review for both RV and MV.
- Our testing will consider both Force and OPCC employees as well as contractors and other non-police personnel.
- Re-vetting is completed for all transfers from other Forces.

Limitations to the scope of the audit assignment:

- We will not validate the accuracy of the decision made but confirm the rationale has been recorded on the vetting system.
- Our work will not guarantee the outcome of HMICFRS inspection.
- We will not consider the process for national security vetting (NSV).
- As the Police and Crime Commissioner does not require vetting this will not form part of our review.
- We will not comment on the appropriateness or outcome of any appeal.
- Testing will be completed on a sample basis, so we will not confirm compliance with all elements of the APP Vetting.
- Legal and regulatory compliance is outside the scope of this review. IT related controls are outside the scope of this audit;
- 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.

Debrief held	29 November 2024
Draft report issued	5 December 2024
Revised draft report issued	8 January 2025
Responses received	19 December 2024 30 January 2025
Final report issued	31 January 2025

Internal audit Contacts	Partner and Head of Internal Audit Associate Director Principal Consultant Senior Consultant
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Client sponsor Distribution	Director of Resources ACC Head of Vetting
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