

The Police, Fire and Crime Commissioner for Staffordshire and the Chief Constable of Staffordshire

Item 5 (ii)

Internal Audit Progress Report

16 February 2022

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

1	Introduction	3
2	Reports	4
	Appendix A – Progress against the internal audit plan 2021/2022	6
	Appendix B – Other matters	8
	Appendix C - Key performance indicators (KPIs).....	10

1 Introduction

The internal audit plan for 2021/22 was presented as a draft plan to the Ethics, Transparency & Audit Panel on 10 February 2021.

We have issued three final reports since the last ETAP meeting which are in relation to:

- Expenses (Partial Assurance)
- Key Financial Controls (Substantial Assurance), and:
- Governance (Substantial Assurance).



We have a number of audits in progress relating to IT Strategy, Fleet Management and Estates. Planning meetings have been held or are scheduled and assignment planning sheets will be issued for the remaining audits. We issued our Crime Recording draft report, which is currently under review with Management.



Regular catch up meetings have been held between RSM and management in order to provide updates in relation to changes within the organisation, impact to operations and also to discuss sector wide issues that may have an impact on the internal audit plan.


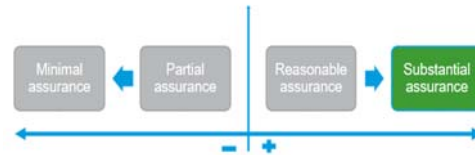


We have shared with management a number of briefings which are outlined in Appendix B below.

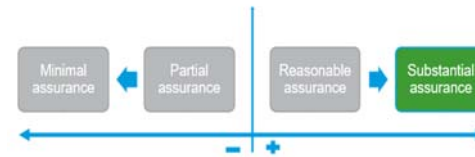
2 Reports

2.1 Summary of final reports being presented to this committee

This section summarises the reports that have been finalised since the last meeting. We have finalised two reports since the previous meeting and these are detailed below:

Assignment	Opinion issued	Actions agreed		
		L	M	H
Expenses Both the design and the application of the current control framework needs to be reviewed and strengthened in order to transparently demonstrate accountability, oversight and compliance with the expenses system and its associated payments. In addition, our audit has clearly highlighted that there is a need to focus on and re-align accountability and ensure that there is routine scrutiny and review of expense claims by line managers who will be best placed to know that the expense claim submitted is accurate, relevant and timely. Where expenses submitted are not periodically checked by line managers there is a risk that reimbursements will be paid which are not related to costs incurred during work or authorised in accordance with Policy.	Partial Assurance  <p>The diagram shows a horizontal scale from Minimal assurance to Substantial assurance. A vertical line is positioned between Partial and Reasonable assurance. The 'Partial assurance' box is highlighted in orange, and the 'Reasonable assurance' box is highlighted in grey. A blue double-headed arrow spans the entire scale, with a '-' sign under Minimal and a '+' sign under Substantial.</p>	2	1	3
Key Financial Controls There is an appropriate control framework in place for governing Key Finance Controls across the Force. Our work confirmed that there are adequate controls in place which are being consistently applied. Areas of improvement have been noted which has resulted in the agreement of four 'Low' priority actions.	Substantial Assurance  <p>The diagram shows a horizontal scale from Minimal assurance to Substantial assurance. A vertical line is positioned between Partial and Reasonable assurance. The 'Substantial assurance' box is highlighted in green, and the 'Reasonable assurance' box is highlighted in grey. A blue double-headed arrow spans the entire scale, with a '-' sign under Minimal and a '+' sign under Substantial.</p>	4	0	0

Assignment	Opinion issued	Actions agreed		
		L	M	H
Governance – OPFCC Our review has confirmed that the Staffordshire Commissioners Office has well-designed controls in place. We noted that a Terms of Reference (ToR) template is used for each forum and that the ToR's clearly define the purpose and duties. However, we identified that timescales are not being recorded for actions raised during certain meetings, and therefore one 'Low' priority action has been agreed with management.	Substantial Assurance	1	0	0



Appendix A – Progress against the internal audit plan 2021/2022

The current Covid-19 situation means that our clients and internal audit are working differently. We understand and recognise the organisations' strategic / primary objectives, and that the developments around Covid-19 will continue to impact on all areas of the organisations' risk profile. We will work closely with management to deliver an internal audit programme which remains flexible and agile to ensure it meets your needs in the current circumstances.

Assignment	Status / Opinion issued	Actions agreed			Target ETAP per IA plan (revised)	Actual ETAP
		L	M	H		
Firearms	Final report issued / Partial Assurance	6	7	2	October 2021	October 2021
Expenses	Final report issued / Partial Assurance	2	1	3	July 2021 (will now be February 2022)	February 2022
Financial Controls	Final report issued / Substantial Assurance	4	0	0	December 2021 (now be February 2022)	February 2022
Governance	OPFCC - Final report issued – Substantial Assurance	1	0	0	December 2021 (now be Feb and May 2022)	February 2022
Crime Recording – Data Integrity	Draft Report issued – Under Review	TBC	TBC	TBC	December 2021 (will now be May 2022)	
Fleet Management	Work in Progress				January 2022 (will now be May 2022)	

Assignment	Status / Opinion issued	Actions agreed			Target ETAP per IA plan (revised)	Actual ETAP
		L	M	H		
ICT Strategy	Draft report issued and further follow up work has been requested by the Force, which will be completed in March 2022				January 2022 (will now be May 2022 to take into account the Follow Up work to be completed)	
Estates	Scope agreed - Work in Progress				February 2022 (will now be May 2022)	
Risk Management	Scope agreed – Work in Progress				December 2021 (will now be May 2022)	
Commissioning – Grant and Delivery	Scope to be agreed - Audit to start February/March 2022				May 2022	
Follow Up of Previous Internal Audit Actions	Scope issued - Audit to start February / March 2022 Note the scope has been extended – Refer to notes included at Appendix B				May 2022	
Corporate Planning	Refer to notes per Appendix B					
Asset Management	Refer to notes per Appendix B					

Appendix B – Other matters

Changes to the audit plan

Our approach to working with you is to respond to your changing assurance needs. By employing an 'agile' or a 'flexible' approach to our service delivery, we are able to change the focus of audits / audit delivery. There are several timing changes that we need to report which are in relation to Asset Management which has been deferred until quarter 4 for 2022/23 to reflect the changes in responsibilities and to ensure the management actions included within our initial report have been implemented. Instead the allocation will be used to complete a follow up of the IT Strategy work. Furthermore, the allocation for Corporate Planning and the proposed scope for that work was in relation to Project Management and the remit of this was covered as part of the revised scope for the IT Strategy audit work. The remaining allocation will be used to fund the extended Follow Up audit work that will be required, prior to the end of March 2022 (refer to the comments below).

Annual Opinion 2021/22

The ETAP should note that the assurances given in our audit assignments are included within our Annual Assurance report. In particular, the ETAP should note that any negative assurance opinions will need to be noted in the annual report and may result in a qualified or negative annual opinions. We have issued two negative opinions (final reports) to date in relation to 2021/22 which will impact the year end opinion, however it is intended to complete some specific follow up work on those areas where a negative opinion has been issued and where the planned date for implementation of the action has been reached by the year end. We will keep the CFO's updated as our work progresses and provide an update to the next ETAP.

Quality assurance and continual improvement

To ensure that RSM remains compliant with the IIA standards and the financial services recommendations for Internal Audit we have a dedicated internal Quality Assurance Team who undertake a programme of reviews to ensure the quality of our audit assignments. This is applicable to all Heads of Internal Audit, where a sample of their clients will be reviewed. Any findings from these reviews being used to inform the training needs of our audit teams. The Quality Assurance Team is made up of; the Head of the Quality Assurance Department (FCA qualified) and an Associate Director (FCCA qualified), with support from other team members across the department. This is in addition to any feedback we receive from our post assignment surveys, client feedback, appraisal processes and training needs assessments.

Post assignment surveys

We are committed to delivering an excellent client experience every time we work with you. Your feedback helps us to improve the quality of the service we deliver to you. Following the completion of each product we deliver we attach a brief survey for the client lead to complete. The results of these surveys will be shared at each ETAP.

Updates and briefings

We have provided the following information and briefings to management and members since the last meeting:

- Emergency Services Briefing – November 2021
- RSM's Conformance with the IIA Standards and Codes of Practice

Appendix C - Key performance indicators (KPIs)

Delivery			Quality		
	Target	Actual		Target	Actual
Draft reports issued within 10 days of debrief meeting	10 days	9 days	Conformance with PSIAS and IIA Standards	Yes	Yes
			Liaison with external audit to allow, where appropriate and required, the external auditor to place reliance on the work of internal audit	Yes	-
Final report issued within 3 days of management response	3 days	1 day	Response time for all general enquiries for assistance	2 working days	1 working day
			Response for emergencies and potential fraud	1 working day	-

For more information contact

Dan Harris, Head of Internal Audit

Daniel.Harris@rsmuk.com

Tel: 07792 948767

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 **The Police, Fire and Crime Commissioner for Staffordshire and the Chief Constable of Staffordshire** 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.

Emergency Services News Briefing

November 2021



Contents

Police	3
Police and Fire	5
Fire	7

In this edition of our news briefing, we draw attention to some of the key developments and publications affecting the sector including a new Protection Fire Standard and ensuring communities feel safe.

Police

Police response to violence against women and girls

Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) has published a report setting out its findings from inspections carried out on how effectively the police respond to violence against women and girls (VAWG) offences. HMICFRS notes that the police had made vast improvements in the response to VAWG over the last decade, including better identification of repeat victims and improved safeguarding measures. But it also found several areas where the police need to improve, with HMICFRS noting 'grave' concerns about the number of VAWG cases closed without charge, and major gaps in the data recorded on VAWG offences.

While HMICFRS has made several recommendations for immediate improvements to police practices, it concluded that the police cannot tackle VAWG alone. It said the whole system, including policing, health and education, must take a fundamentally new approach. HMICFRS also note that the government should consider legislating to create a new statutory duty for all partner agencies to work together to protect women and girls, similar to the existing framework for child protection .

[Read more](#)

Forces given funding boost to increase roll out of Hotspot Policing

The Home Office has announced that 18 police forces will receive a share of £4.12m to increase Hotspot Policing in towns and cities blighted by violent crime. The additional £4.12m will bring the total funding given to those 18 forces to tackle serious violence to £28.6m in 2021. The investment in Hotspot Policing follows the government's Beating Crime Plan to reduce crime, protect victims and make the country safer.

[Read more](#)

Police and local authorities given extra funding for safer streets

The Home Office has announced a £23.5m fund which will be shared amongst police forces and local authorities across England and Wales to make public spaces safer as part of the government's Safer Streets Fund.

[Read more](#)

Questions for committee's consideration

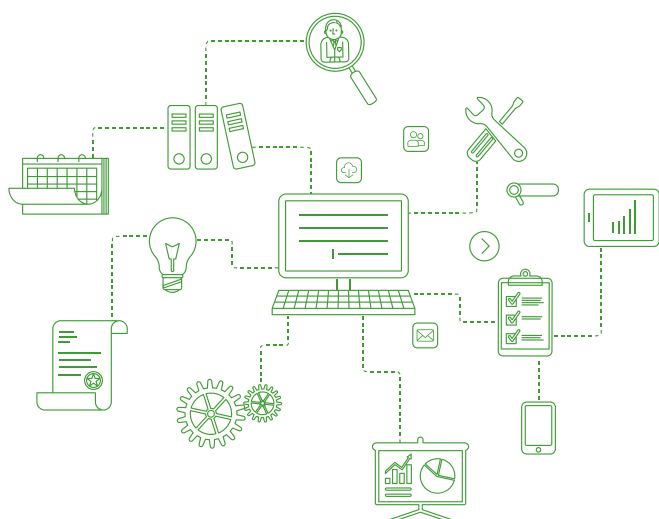
In light of recent high profile national events and the HMICFRS review, how has the Force responded? What action has been taken? What action is planned?

Is the AC aware of the recommendations and do you have assurance on the progress made to date and any gaps in assurance?

Autumn Budget

In delivering his Autumn Budget the Chancellor, Rishi Sunak, announced a fund of £540m to recruit the final 8,000 police officers to reach the government's commitment of recruiting 20,000 new officers by 2023. To ensure swift access to justice for victims, the budget provides almost £650m additional funding by 2024/25 to manage the increased number of offenders being brought to justice by these officers .

[Read more](#)



Questions for committee's consideration

Do you know your Force allocation and if your Force has recruited to the respective target?

Do you have assurance the Force processes in relation to recruitment, onboarding, equipment and training are efficient and effective?

Firearms licensing

The Home Office has published new guidance on firearms licensing which will require any applicant to provide details of their medical history to the police. Applicants for a firearms licence may also be subjected to social media checks and officers will be able to interview their friends or family, or any other relevant individuals .

[Read more](#)

Questions for committee's consideration

Has your Force updated its procedures and how are you getting assurance that Firearms licensing arrangements are robust?



Police and Fire

Cyber and information security

The National Audit Office (NAO) has published a guide to support audit committees to work through the complexity of cyber security. The NAO notes that audit committees should be scrutinising cyber security arrangements. To support this, the NAO's guide complements government advice by setting out high-level questions and issues for audit committees to consider. Audit committees should gain the appropriate assurance for the critical management and control of cyber security and information risk.

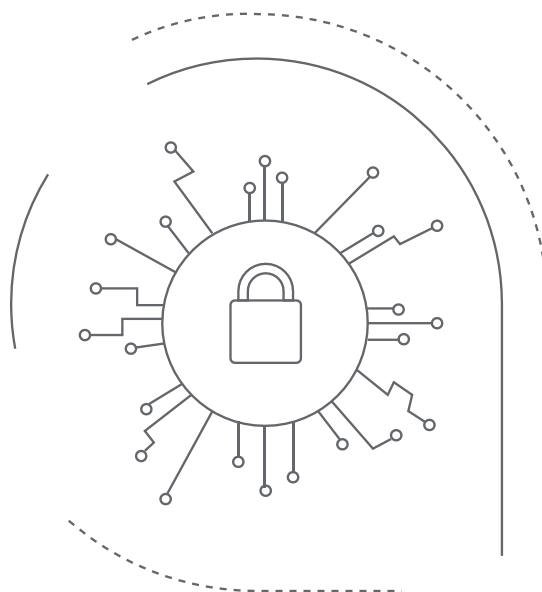
The guide provides a checklist of questions and issues covering:

- the overall approach to cyber security and risk management;
- capability needed to manage cyber security; and
- specific aspects, such as information risk management, engagement and training, asset management, architecture and configuration, vulnerability management, identity and access management, data security, logging and monitoring and incident management.

Questions include:

1. 'Has the organisation implemented a formal regime or structured approach to cyber security which guides its activities and expenditure?';
2. 'How has management decided what level of risk it will tolerate and how it will manage that risk?';
3. 'Does the organisation understand if its risk profile and appetite has changed due to coronavirus?'; and
4. 'Has the organisation identified and deployed the capability it needs in this area?.'

[Read more](#)



Questions for committee's consideration

Has the AC received recent assurance and do they get ongoing assurance in relation to cyber and information security?



ESG (Environmental, Social and Governance)

ESG is poised to be the defining business matter of the decade. With investors, employees, customers and business partners all demanding responsible business activity, organisations cannot ignore how important sustainable and ethical business now is globally.

In a survey conducted by RSM, over 400 middle market business leaders shared how they interact with ESG issues. 56 per cent of businesses are familiar with the concept of ESG. Commissioners, Forces and Fire Authorities need to pay attention to these important pillars of ESG, as being proactive on the social and governance considerations offers great value to organisations. Whilst the survey was aimed at middle market businesses, ESG is becoming an increasingly significant topic across all organisations and businesses whether that is the corporate, public and not for profit sectors.

Read our findings on [The Real Economy hub](#).

RSM's new Associate Director leading on ESG matters



Paul Callum Associate Director – Risk Advisory

Paul.callum@rsmuk.com

M: 07813326064

<https://www.linkedin.com/in/paulcallum>

www.insight4grc.com

Former senior Police officer, Paul is a highly trained detective (with 30 years Policing experience) and critical incident manager with specialist knowledge of complex investigations into organised crime, business human rights and modern slavery, safeguarding and protective security. Paul provided risk management advice to businesses, on a range of subject matters, with a particular focus on the range of societal risks now being experienced by organisations and how responsible business principles can be applied to make for a more sustainable business, no matter what size or sector. Paul's approach looks beyond compliance and he is well placed to assist our Police and Fire clients. RSM have recently launched an ESG maturity assessment, and we can provide more details on request.

Fire

Protection Fire Standard

The Fire Standards Board has published the Protection Fire Standard which aims to bring a consistent national approach by fire and rescue services to deliver effective and efficient fire protection activities within their local communities. The desired outcome of the Protection Fire Standard is that it will enable a fire and rescue service to improve the safety of the built environment and wellbeing of its community, complying with its statutory responsibilities. It aims to enable a fire and rescue service to target its resources, using data and intelligence to proactively plan, respond and adapt to the changing needs of its community. Additionally, the Standard aims to evoke a learning and sharing culture among fire and rescue services, to improve and innovate Fire Protection activities and work collaboratively with other regulators, partners and stakeholders.

Alongside the publication of the Protection Fire Standard is the launch of a Fire Standards Implementation Tool. The tool has been designed to support services in assessing how well they meet the Standard and will enable them to build an action plan to resolve areas where there may be gaps.

The Fire Standards Board has also launched a [consultation](#) on the Fire Standard for Fire Investigation. This further Fire Standard will accompany the other eight Fire Standards currently in place. The consultation closes on 6 December 2021 .

[Read more](#)

National co-ordination and advisory framework

The revised national coordination and advisory framework (NCAF) for the fire service in England has been reviewed and published. It reflects a number of changes including:

- changes to the National Fire Chiefs Council (NFCC) Chair;
- changes to the Home Office department responsible for Fire Resilience;
- learning from national scale incidents from recent years;
- coronavirus learning; and
- role of the National Strategic Advisory Team (NSAT).

[Read more](#)

Questions for committee's consideration

Is the committee assured that the Service is working to implement the requirements of the new standard?

Has your Service / Authority responded to the consultation?



Authors

Daniel Harris

National Head of Emergency Services and Local Government

T +44 (0)7792 948 767

daniel.harris@rsmuk.com

Zara Raza

Risk Assurance Technical

zara.raza@rsmuk.com

rsmuk.com

The UK group of companies and LLPs trading as RSM is a member of the RSM network. RSM is the trading name used by the members of the RSM network. Each member of the RSM network is an independent accounting and consulting firm each of which practises in its own right. The RSM network is not itself a separate legal entity of any description in any jurisdiction. The RSM network is administered by RSM International Limited, a company registered in England and Wales (company number 4040598) whose registered office is at 50 Cannon Street, London EC4N 6JJ. The brand and trademark RSM and other intellectual property rights used by members of the network are owned by RSM International Association, an association governed by article 60 et seq of the Civil Code of Switzerland whose seat is in Zug.

RSM UK Corporate Finance LLP, RSM UK Restructuring Advisory LLP, RSM UK Risk Assurance Services LLP, RSM UK Tax and Advisory Services LLP, RSM UK Audit LLP, RSM UK Consulting LLP, RSM Northern Ireland (UK) Limited and RSM UK Tax and Accounting Limited are not authorised under the Financial Services and Markets Act 2000 but we are able in certain circumstances to offer a limited range of investment services because we are licensed by the Institute of Chartered Accountants in England and Wales. We can provide these investment services if they are an incidental part of the professional services we have been engaged to provide. RSM UK Legal LLP is authorised and regulated by the Solicitors Regulation Authority, reference number 626317, to undertake reserved and non-reserved legal activities. It is not authorised under the Financial Services and Markets Act 2000 but is able in certain circumstances to offer a limited range of investment services because it is authorised and regulated by the Solicitors Regulation Authority and may provide investment services if they are an incidental part of the professional services that it has been engaged to provide. Whilst every effort has been made to ensure accuracy, information contained in this communication may not be comprehensive and recipients should not act upon it without seeking professional advice.

© 2021 RSM UK Group LLP, all rights reserved

EXTERNAL QUALITY ASSESSMENT OUTCOMES



RSM'S CONFORMANCE WITH THE IIA STANDARDS AND CODES OF PRACTICE

RSM UK Risk Assurance Services LLP

January 2022

THE POWER OF BEING UNDERSTOOD
AUDIT | TAX | CONSULTING



RSM'S CONFORMANCE WITH THE IIA STANDARDS AND CODES OF PRACTICE

RSM UK Risk Assurance Services LLP commissioned an external quality assessment (EQA) of its internal audit services in 2021. An EQA is required every five years, in line with the requirements of the International Professional Practices Framework (IPPF) and the Standards set by the Global Institute of Internal Auditors (IIA). Our independent EQA reviewed our conformance with the IPPF Standards, the Public Sector Internal Audit Standards (PSIAS), Internal Audit Code of Practice on effective internal audit in the Private and Third sectors, and the Internal Audit Financial Services Code of Practice. We provide below our summary of the results for your information.

Review approach

Our independent EQA assessor, Grant Thornton has utilised its established assessment framework to review RSM's internal audit services in relation to vision and strategy, planning and prioritisation, people and culture, working practices, tools, quality and deliverables, and role and mandate.

Our EQA involved a review of a sample of 10 audit files and audit reports shared with audit committees as well as a review of our working papers. Our own internal audit methodology has been reviewed against both the Standards and Codes of Practice.

The review process also involved interviewing RSM partners, directors and managers, and to gather client views, our independent assessor set up and ran a client survey, enabling broader reach and to obtain input from a larger pool of organisations we work with. Thank you to everyone that took the time to share their thoughts and insights.

Key strengths observed in our EQA

From the assessment, the following key strengths were noted.

- A well developed methodology with good conformance with standards, supported by manuals and policies, which is 'well understood and applied consistently' across clients and regions. 'Audit engagements follow a clear structure, are well executed with adequate supervision.'
- 'Audit strategy, charter and plans are well developed for each client.'
- 'The audit reports reviewed were clear, concise and well written for the needs of RSM IA's clients.'
- 'RSM IA provides useful, value add thought leadership and benchmarking for its clients.'
- 'There is a strong focus in RSM IA on training and capability, resulting in good levels of competence and technical knowledge, supported by Subject Matter Experts and the Technical Team.'

EQA outcomes



We are pleased to confirm that based on the work undertaken and the sample of files reviewed by our independent EQA assessor, RSM UK Risk Assurance Services LLP 'generally conforms to the requirements of the IIA Standards' and that 'RSM IA also generally conforms with the other Professional Standards set out above and the IIA Code of Ethics. There were no instances of non-conformance with any of the Professional Standards.'

The rating of 'generally conforms' is the highest rating that can be achieved, in line with the IIA's EQA assessment model.

RSM'S CONFORMANCE WITH THE IIA STANDARDS AND CODES OF PRACTICE

Survey outcomes

In total 160 surveys were shared with a representative cross section of our clients, in terms of sector and region. 67 responses to the survey were received from public and third sector organisations, corporate businesses and financial services clients.

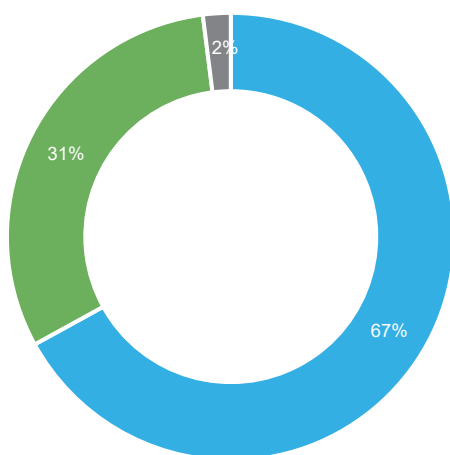
We very much value the feedback received from our survey participants. We are committed to providing an excellent client service and from both the survey feedback and overall EQA outcomes, the 'areas identified for improvement from the EQA will be taken forward as part of a continuous improvement plan.'

Overall, the responses to the survey were very positive, with 91 per cent either agreeing or agreeing strongly with the survey questions.

EQA survey results

RSM builds strong relationships with our organisation so that audit work is aligned to our key risks, strategy and priorities.

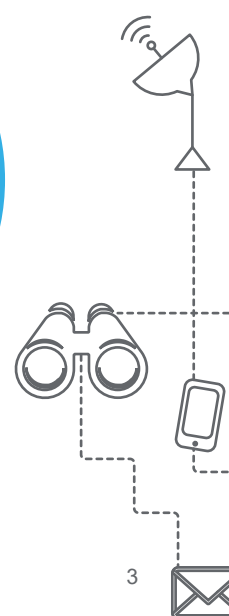
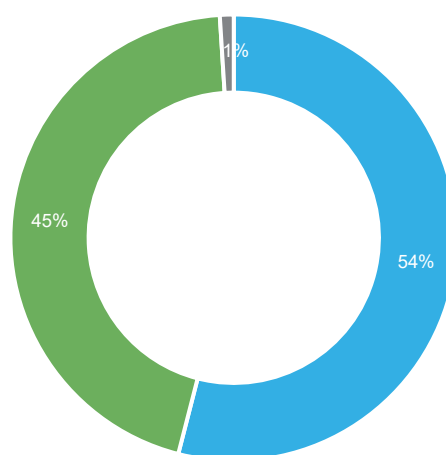
■ Strongly agree ■ Agree ■ Neither agree or disagree



High level survey findings

- Internal audit's role is well-understood, with 'teams well respected for their audit expertise, collaborative approach and sector guidance provided.'
- 'IA teams show a good understanding of client needs and sector requirements', with audits focussed on the right areas.
- 'Audit planning and prioritisation is seen as collaborative', with audit work carried out efficiently and to a good standard.
- The internal audit team has been 'very proactive and flexible' in how it has responded to the challenges of auditing during the pandemic.
- Audit reports reviewed were well written and the style and format clear and concise.

RSM audit work helps improve our control environment to support organisation objectives, governance or regulatory compliance and external requirements.

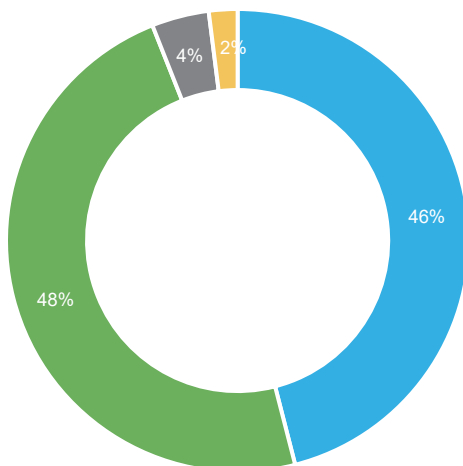


RSM'S CONFORMANCE WITH THE IIA STANDARDS AND CODES OF PRACTICE

EQA survey results continued

The risk assessment activity helps to focus the audit plan on the key risks and priorities for our organisation and takes account of our risk appetite.

- Strongly agree
- Agree
- Neither agree or disagree
- Not applicable or I can't judge



Client survey quotes:

'RSM provide an efficient and effective internal audit service, and make a contribution which is highly valued.'

'RSM staff have a real breadth of experience which they can tap into to provide advice, guidance and best practice.'

'RSM meets all requirements of a professionally run internal audit team.'

What does this mean for our clients?

You can be assured that your internal audit services continue to conform with internationally recognised Standards and the Codes of Practices. The internal audit services you receive follow an established and embedded methodology, that facilitates audit work that is both effective and responsive to you, as our clients', assurance needs.

RSM UK Risk Assurance Services LLP is pleased to confirm the outcomes of our EQA. If you require any further information, please contact your RSM client manager or engagement partner.



FOR FURTHER INFORMATION CONTACT

Mark Jones

Head of Internal Audit, Risk Assurance

M: +44 (0)7768 952 387

E: mark.jones@rsmuk.com

Shauna Mallinson

Head of Risk Assurance Technical

M: +44 (0)7800 617 447

E: shauna.mallinson@rsmuk.com

RSM UK Risk Assurance Services LLP

25 Farringdon Street
London
EC4A 4AB
United Kingdom
T +44 (0)20 3201 8000
rsmuk.com

The UK group of companies and LLPs trading as RSM is a member of the RSM network. RSM is the trading name used by the members of the RSM network. Each member of the RSM network is an independent accounting and consulting firm each of which practises in its own right. The RSM network is not itself a separate legal entity of any description in any jurisdiction. The RSM network is administered by RSM International Limited, a company registered in England and Wales (company number 4040598) whose registered office is at 50 Cannon Street, London EC4N 6JJ. The brand and trademark RSM and other intellectual property rights used by members of the network are owned by RSM International Association, an association governed by article 60 et seq of the Civil Code of Switzerland whose seat is in Zug.

RSM UK Corporate Finance LLP, RSM UK Restructuring Advisory LLP, RSM UK Risk Assurance Services LLP, RSM UK Tax and Advisory Services LLP, RSM UK Audit LLP, RSM UK Consulting LLP, RSM Northern Ireland (UK) Limited and RSM UK Tax and Accounting Limited are not authorised under the Financial Services and Markets Act 2000 but we are able in certain circumstances to offer a limited range of investment services because we are licensed by the Institute of Chartered Accountants in England and Wales. We can provide these investment services if they are an incidental part of the professional services we have been engaged to provide. RSM UK Legal LLP is authorised and regulated by the Solicitors Regulation Authority, reference number 626317, to undertake reserved and non-reserved legal activities. It is not authorised under the Financial Services and Markets Act 2000 but is able in certain circumstances to offer a limited range of investment services because it is authorised and regulated by the Solicitors Regulation Authority and may provide investment services if they are an incidental part of the professional services that it has been engaged to provide. Whilst every effort has been made to ensure accuracy, information contained in this communication may not be comprehensive and recipients should not act upon it without seeking professional advice.