



# Police and Crime Commissioner for Staffordshire and Chief Constable for Staffordshire

Joint external audit plan

Year ended 31 March 2025

April 2025



## Your key team members

### Paul Grady

Key Audit Partner

[Paul.Grady@azets.co.uk](mailto:Paul.Grady@azets.co.uk)

### Manpreet Kaur

Audit Manager

[Manpreet.Kaur@azets.co.uk](mailto:Manpreet.Kaur@azets.co.uk)

### Charlotte Amos

In-Charge auditor

[Charlotte.Amos@azets.co.uk](mailto:Charlotte.Amos@azets.co.uk)

## Contents

Introduction	3
Audit scope and general approach	5
Building back assurance	9
Indicative build back planner	13
Indicative assurance over build back period	14
Anticipated audit reports by year	15
Our financial statements audit explained	16
Materiality	17
Significant and other risks of material misstatement	18
Value for Money	24
Audit team and logistics	27
Independence, objectivity and other services provided	28
Fees	29

## Appendices

Appendix I: Group audit scope and risk assessment	30
---	----

# Introduction

## **Adding value through the audit**

*All of our clients demand of us a positive contribution to meeting their ever-changing business needs. Our aim is to add value through our external audit work by being constructive and forward looking, by identifying areas of improvement and by recommending and encouraging good practice. In this way, we aim to help promote improved standards of governance, better management and decision making and more effective use of resources.*

## **Purpose**

This joint audit plan highlights the key elements of our proposed audit strategy and provides an overview of the planned scope and timing of the statutory external audit of The Police and Crime Commissioner for Staffordshire ('the PCC') and The Chief Constable for Staffordshire ('the Chief Constable') for the year ended 31 March 2025 for the PCC and Chief Constable (those charged with governance).

The core elements of our work include:

- Audits of the 2024/25 Statement of Accounts for the Chief Constable single entity, the Police and Crime Commissioner single entity, and its Group; and
- An assessment of the PCC's and Chief Constable's arrangements for securing economy, efficiency and effectiveness in their use of resources (our Value for Money work).

We will conduct our audit in accordance with International Standards on Auditing (ISAs) (UK), the Local Audit and Accountability Act 2014 (the 'Act'), and the National Audit Office Code of Audit Practice. The Code of Audit Practice sets out what local auditors of relevant local public bodies are required to do to fulfil their statutory responsibilities under the Act.

## **Auditor responsibilities**

As auditor we are responsible for performing an audit, in accordance with the Local Audit and Accountability Act 2014, the Code of Audit Practice issued by the National Audit Office and ISAs UK. Our primary responsibility is to form and express an independent opinion on the Chief Constable's financial statements and the PCC's and Group's financial statements, stating whether they provide a true and fair view and have been prepared properly in accordance with applicable law and the CIPFA Code of Practice on Local Authority Accounting in the UK (the 'CIPFA Code').

For both the PCC and Chief Constable audits, we are also required to:

- Report on whether the other information included in the Statement of Accounts (including the Narrative Report and Annual Governance Statement) is consistent with the financial statements;
- Report by exception if the disclosures in the Annual Governance Statement are incomplete or if the Annual Governance Statement is misleading or inconsistent with our knowledge acquired during the audit;
- Report by exception any significant weaknesses identified in arrangements for securing value for money and a summary of associated recommendations;
- Report by exception on the use of our other statutory powers and duties; and
- Certify completion of our audits.

*continued.....3*

# Introduction

*We will conduct our audit in accordance with International Standards on Auditing (ISAs) (UK), the Local Audit and Accountability Act 2014 (the 'Act'), and the National Audit Office Code of Audit Practice. The Code of Audit Practice sets out what local auditors of relevant local public bodies are required to do to fulfil their statutory responsibilities under the Act.*

*This planning letter has been prepared for the sole use of those charged with governance and management and should not be relied upon by third parties. No responsibility is assumed by Azets Audit Services to third parties.*

## Auditor responsibilities (....continued)

We will issue our joint Audit Completion Report and joint Auditors Annual Report to the Ethics, Transparency and Audit Panel (ETAP, the Audit Committee), PCC and Chief Constable, setting out the findings from our work.

Under the Act we have a broad range of reporting responsibilities and powers that are unique to the audit of local authorities in the United Kingdom. These include:

- Reporting matters in the public interest;
- Making written recommendations to the PCC and Chief Constable;
- Making an application to the court for a declaration that an item of account is contrary to law;
- Issuing an advisory notice; or
- Making an application for judicial review.

The Act also requires us to give an elector, or any representative of the elector, the opportunity to question us about the accounting records of the PCC / Chief Constable and consider any objection made to the accounts.

On completion of our audit work we will issue a joint Audit Completion Report (prior to the approval of the two sets of financial statements), detailing our significant findings and other matters arising from the audits on the financial statements, together with a joint Auditor's Annual Report including our commentary on the value for money arrangements of the PCC and Chief Constable.

If, during the course of the audit, we identify any significant adverse or unexpected findings that we conclude should be communicated, we will do so on a timely basis, either informally or in writing.

The audit does not relieve management, the PCC or the Chief Constable of their responsibilities, including those in relation to the preparation of the financial statements.

## PCC and Chief Constable responsibilities

The PCC and Chief Constable both have responsibility for:

- Preparing financial statements which give a true and fair view, in accordance with the applicable financial reporting framework and relevant legislation;
- Preparing and publishing, along with the financial statements, an annual governance statement and narrative report;
- Maintaining proper accounting records and preparing working papers to an acceptable professional standard that support its financial statements and related reports disclosures; and
- Ensuring the proper financial stewardship of public funds, complying with relevant legislation and establishing effective arrangements for governance, propriety and regularity.

# Audit scope and general approach

This section of our letter sets out the scope and nature of our audit and should be considered in conjunction with the [Terms of Appointment](#) and [Statement of Responsibilities](#) issued by Public Sector Audit Appointments Limited (PSAA).

## General approach

Our objective when performing an audit is to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement and to issue an auditor's report that includes our auditor's opinion.

As part of our risk-based audit approach, we will:

- Perform risk assessment procedures including updating our understanding of the Chief Constable, PCC and group, including their environments, the financial reporting framework and their system of internal control;
- Review the design and implementation of key internal controls;
- Identify and assess the risks of material misstatement, whether due to fraud or error, at the financial statement level and the assertion level for classes of transaction, account balances and disclosures;

- Design and perform audit procedures responsive to those risks, to obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion; and
- Exercise professional judgment and maintain professional scepticism throughout the audit recognising that circumstances may exist that cause the financial statements to be materially misstated.

We will undertake a variety of audit procedures designed to provide us with sufficient evidence to give us reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error.

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. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

We include an explanation in the auditor's report of the extent to which the audit was capable of detecting irregularities, including fraud and respective responsibilities for prevention and detection of fraud.

# Audit scope and general approach

## Materiality

We apply the concept of materiality both in planning and performing the audits, and in evaluating the effect of identified misstatements on the audit and of uncorrected misstatements.

Judgments about materiality are made in the light of surrounding circumstances and are affected by our perception of the financial information needs of users of the financial statements, and by the size or nature of a misstatement, or a combination of both. **The basis for our assessment of materiality for the year is set out in Page 17.**

Any identified errors greater than:

**£195,000**

will be recorded and discussed with you and, if not adjusted, confirmed as immaterial as part of your letter of representation to us.

## Accounting systems and internal controls

The purpose of an audit is to express an opinion on the financial statements. We will follow a substantive testing approach to gain audit assurance rather than relying on tests of controls. As part of our work, we consider certain internal controls relevant to the preparation of the financial statements such that we are able to design appropriate audit procedures. However, this work does not cover all internal controls and is not designed for the purpose of expressing an opinion on the effectiveness of internal controls. If, as part of our consideration of internal controls, we identify significant deficiencies in controls, we will report these to you in writing.

## Specialised skill or knowledge required to complete the audit procedures

We will use audit specialists to assist us in our audit work in the following areas:

- The audit of the actuarial assumptions used in the calculation of the defined benefit pension liability/asset; and
- The audit of the asset valuation assumption used in calculation of the revaluation of Land and Building.

We will consult internally with our Technology Risk team for them to support the audit team by assessing the information technology general controls (ITGC) of the Integra System.

# Audit scope and general approach

## Significant changes in the financial reporting framework

There have been no significant changes in the financial reporting framework this year, including the CIPFA Code of Practice on Local Authority Accounting in the United Kingdom (the 'CIPFA Code'). The new standard relating to IFRS 16 Leases issued in January 2016 has now been adopted for implementation within the 2024/25 Code.

## Significant changes in the Chief Constable, PCC and group's functions or activities

There have been no significant changes to the functions and activities of the Chief Constable, PCC or its group structure.

## Going concern

### Management responsibility

Management is required to make and document an assessment of whether the Chief Constable, PCC and group is a going concern when preparing the financial statements. The review period should cover at least 12 months from the date of approval of the financial statements. Management are also required to make balanced, proportionate and clear disclosures about going concern within the financial statements where material uncertainties exist in order to give a true and fair view.

## Going concern

### Auditor responsibility

Under ISA (UK) 570, we are required to consider the appropriateness of management's use of the going concern assumption in the preparation of the financial statements and consider whether there are material uncertainties about the Chief Constable's, PCC's and group's ability to continue as a going concern that need to be disclosed in the financial statements.

In assessing going concern, we will consider the guidance published in the CIPFA Code and Practice Note 10 (PN10), which focusses on the anticipated future provision of services in the public sector rather than the future existence of the entity itself.

# Audit scope and general approach

## Related party transactions

ISA 550 requires that the audit process starts with the audited body providing a list of related parties to the auditor, including any entities under common control.

During our initial audit planning you have informed us of the individuals and entities that you consider to be related parties of the PCC and Chief Constable. Please advise us of any changes as and when they arise.

## Additional procedures for the NAO

The National Audit Office (the 'NAO') issues group audit instructions which set out additional audit requirements. We expect the procedures for this year to be similar to previous years.

The NAO audit team for the Whole of Government Accounts (WGA) requests us to undertake specific audit procedures to provide them with additional assurance over the amounts recorded in WGA schedules. The extent of these procedures will depend on whether the PCC and Chief Constable have been selected by the NAO as a sampled component for 2023/24. As at the date of this report, the draft instructions have not yet been issued by the NAO and the NAO have not yet confirmed which entities will be sampled components.

We will comply with the instructions and report to the NAO in accordance with their requirements once instructions have been issued.

# Building back assurance

## Statutory backstop dates and disclaimed audits

**Statutory Instrument (2024) No. 907** - “*The Accounts and Audit (Amendment) Regulations 2024*”, imposed annual statutory backstop dates up to and including the 2027/28 year of account for the publication by the PCC & Chief Constable of its final Statement of Accounts. The Code of Audit Practice specifies that auditors are required to issue their auditor’s report before these dates, even if planned audit procedures are not fully complete, so that local government bodies can comply with the statutory reporting deadline.

This legislation provides the following statutory backstop dates:

- 13 December 2024 Audits from 2015/16 to 2022/23
- 28 February 2025 2023/24 audit
- 27 February 2026 2024/25 audit
- 31 January 2027 2025/26 audit
- 30 November 2027 2026/27 audit
- 30 November 2028 2027/28 audit

The statutory backstop has resulted in the audits of the PCC, Chief Constable & Group’s accounts being disclaimed for 2022/23 and 2023/24. The previous clean opinions, where the closing balances were assured by the auditor, related to 2021/22. The closing balances as at 31 March 2022 are therefore our required starting point for building back assurance.

## Building back assurance

Government’s expectation is that auditors and audited bodies build back assurance to enable, at some point in the future, the return to unmodified (clean) opinions. The recovery period has been designed to allow auditors to rebuild assurance for balances from disclaimed years over multiple audit cycles, reducing the risk of the backlog recurring. Because auditors will need to make prioritisation decisions to issue audit opinions ahead of the backstop dates, they may not be able to obtain sufficient evidence to support all balances nor all in-year and comparative expenditure, income, cash flow and reserves movements.

As a firm we have invested considerable resources in developing our overall response to the disclaimed periods of assurance, the impact this has on our audit responsibilities and what an indicative build-back plan may involve. Due to the complexities caused by the disclaiming of previous audits our work has required greater involvement from senior members of the audit team than would normally be the case. PSAA has made clear that this additional work is over and above the annual scale fee.

Our planning takes into account the guidance contained in the [Local Audit Reset and Recovery Implementation Guidance](#) (LARRIG), numbers 1 to 5. LARRIGs are prepared and published by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General (C&AG) who has power to issue guidance to auditors under Schedule 6 paragraph 9 of the *Local Audit and Accountability Act 2014* (the Act). LARRIGs are prepared and published with the endorsement of the Financial Reporting Council (FRC) and are intended to support the reset and recovery of local audit in England. The guidance in LARRIGs supports auditors in meeting their requirements under the Act and the [Code of Audit Practice](#) published by the NAO on behalf of the C&AG.

# Building back assurance

Our planning also takes into account the guidance contained in the FRC's document [Local Audit Backlog Rebuilding Assurance](#). Alongside the backlog measures, the Government has announced its intention to 'overhaul the local audit system.'

The FRC's guidance states: *"Recovery from the backlog is a shared endeavour between auditors and local bodies. Accounts preparers have a vital part to play, providing good quality draft financial statements supported by comprehensive working papers and supporting evidence to auditors. The success of these proposals relies on both auditors and accounts preparers working closely together to agree jointly-owned delivery plans for each year's audit. Chartered Institute of Public Finance and Accountancy (CIPFA) are responsible for the production of guidance to support accounts preparers. Audit Committees should ensure that they are planning and able to play their full part in the process."*

Elements of building back assurance are subject to detailed discussion within a cross-firm working group, also attended by the FRC, known as 'the Sandbox'. We will ensure our build-back approach is fully ISA compliant and, where it relies on the eventual outcome of Sandbox discussions, we will only utilise this approach where it has been endorsed by MHCLG.

As part of our work in 2023/24 we began assessing what work, carried out in 2023/24, can be used to inform the process of rebuilding assurance in future years. Where work was able to be undertaken in 2023/24, we intend to accrete this work into this and future audit periods to inform the future building back of assurance. The build-back approach will require us to apply a process of rebuilding assurance over all financial years for which disclaimers of opinion have been issued.

As a result of the approach we adopted in 2023/24 we have developed our understanding of the Chief Constable, PCC and Group's systems, processes, controls and arrangements for the preparation of the financial statements and have gathered information which may inform the process of rebuilding assurance in this and future years.

We have developed an indicative end-to-end build-back recovery plan for disclaimed audits. We set out this indicative plan for your entity here.

## Our overarching approach

Our approach to your audit from 2024/25 onwards comprises three distinct phases with the ultimate objective of returning to unmodified opinions in the future.

Phase	Planned work	Timing	Included in scale fee?
1	Undertake the normal 'in-year' audit. This will provide assurance over some closing balances and most in-year movements	Annually	Yes
2	Undertake 'build-back' testing back to the last clean opinion for specified balance sheet items where full assurance over the closing balance cannot be obtained without opening assurance	To be agreed with the client	No – additional cost
3	Undertake work on prior-year disclaimed CIES entries and reserve movements back to the last clean opinion (subject to Sandbox discussions)	To be agreed with the client	No – additional cost

# Building back assurance

One of the contributing factors to the existing backlog of opinions nationally was insufficient capacity across audit suppliers and finance teams. These capacity constraints continue. It is therefore not possible to rebuild all assurance within a one-year period. In terms of the work required under phases 2 and 3 – which could be considerable – we will discuss with management the appropriate timing and year for such work. For 2024/25 we anticipate there will be sufficient capacity to undertake phase 1 and potentially some elements of phase 2, with the remainder of the indicative build back plan falling into future years.

## Phase 1: the ‘in-year’ audit and accretion of evidence

In 2024/25 and future years, our ‘in-year’ audit will enable us to reach one of the following conclusions (see table to the right) for each balance sheet item of account. This approach is subject to the provision of appropriate and timely evidence which fully supports the balances in question, and whether our detailed work confirms our assumptions over which balances can be fully supported independently of the missing opening assurance.

The items in the first category will be rolled forward and accreted into future years as part of the overarching indicative build-back strategy. It will take a minimum of three years for the items in this first category to be fully assured across three closing balances. At this point, no retrospective build back should be required for these items of account.

The items in the second category will need further work to obtain full assurance, which form phases 2 and 3 of the overarching indicative build-back approach.

Conclusion	Likely applicable balances (list not exhaustive)
Assurance gained over the closing balance of the item of account (i.e. closing balance is not inherently tied to the opening position)	<ul style="list-style-type: none"><li>• Other land and buildings valuation</li><li>• Intangible assets</li><li>• Debtors</li><li>• Creditors</li><li>• Cash and cash equivalents</li><li>• Borrowing</li><li>• Provisions</li></ul>
Assurance gained in-year but lack of opening assurance means the closing balance / full year balance on CIES cannot be fully assured and remains disclaimed	<ul style="list-style-type: none"><li>• Property plant and equipment</li><li>• Pension liabilities (IAS19)</li><li>• Long term debtors</li><li>• Long term creditors</li><li>• Long term lease liabilities</li><li>• All reserves</li></ul>

# Building back assurance

## Phase 2: build-back for specified balance sheet items where the closing position is inherently tied to the opening position

These closing balances can only be assured by undertaking work on these items of account in the disclaimed years, back to the last clean opinion.

We are not, at this stage, proposing to rebuild assurance for historic land and buildings valuations and IAS19 pension valuations, or CIES income and expenditure, over the disclaimed years. This is considered further in Phase 3.

Obtaining full assurance over the pension liability valuation (IAS19) closing balance will not be possible until the completion of the next triennial valuation. This is because of missing assurance over the current position dating back to the previous triennial valuation. The next triennial valuation is due to be accounted for from 2025/26, and we will undertake work in respect of this in conjunction with the pension fund auditor during the 2025/26 audit year.

In 2024/25 we will undertake work on the IAS19 disclosures and, in particular, the PCC and Chief Constable's accounting for the pension asset ceiling and related accounting items, to assess the accuracy and disclosure of these and other factors, in readiness for 2025/26 and the triennial valuation.

## Phase 3: build-back on prior year disclaimed CIES entries and reserve movements back to the last clean opinion

The approach to this is being discussed by all firms within the 'Sandbox'. Firms, including Azets, will only use this approach if it is endorsed by MHCLG and appropriate guidance.

If it is endorsed, we will employ the 'Sandbox' approach back to the last clean opinion to gain full assurance over prior years' CIES and reserves movements and, therefore, reserves closing balances. This may involve selective substantive testing of income and expenditure transactions within disclaimed years.

If the 'Sandbox' approach is not endorsed, we will need to undertake full CIES testing in previously disclaimed years. This will then enable us to undertake reserves testing for each disclaimed year, enabling us to rebuild the assurance over the reserves balances and provide assurance over the general fund, earmarked reserves and unusable reserves, as well as over the Capital Financing Requirement (CFR) and minimum revenue provision (MRP).

# Indicative build-back planner

	Build back of specified closing balances				Recovery of closing balances	Recovery of reserves and CIES	
Item of account	Phase 1				Phase 2 (year and timing to be agreed with management)	Phase 3 (year and timing to be agreed with management)	Included in scale fee?
	2024/25	2025/26	2026/27	2027/28			
Income in-year ( <i>fees and charges, taxation, grants, other income</i> )	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Expenditure in-year ( <i>payroll, operating expenditure, other expenditure</i> )	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Other land and buildings valuation	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Closing balances not inherently tied to the opening balance ( <i>includes investments, debtors, creditors, cash and cash equivalents, borrowing, provisions</i> )	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Pension liabilities (IAS19) ( <i>triennial in 2025/26</i> )	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Reserves and reserves movements in-year ( <i>general fund, earmarked reserves, unusable reserves, CFR, MRP, disclaimed year CIES movements</i> )	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Cash flow statement in-year	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Collection fund in-year	Yes	Yes	Yes	Yes	N/A	N/A	Yes
Cash flow statement and related notes full assurance	Yes	Yes	Yes	Yes	N/A	N/A	Yes
PPE closing balances ( <i>recovery of additions, disposals, depreciation and other capital movements</i> )	No	No	No	No	Yes	No	No
Closing balances inherently tied to the opening balances where prior year recovery is required ( <i>Long term debtors, long term creditors, long term lease liabilities, income strip</i> )	No	No	No	No	Yes	No	No
Reserves and reserves movements full assurance ( <i>general fund, earmarked reserves, unusable reserves, CFR, MRP, disclaimed year CIES movements</i> )	No	No	No	No	No	Yes	No

# Indicative assurance over build-back period

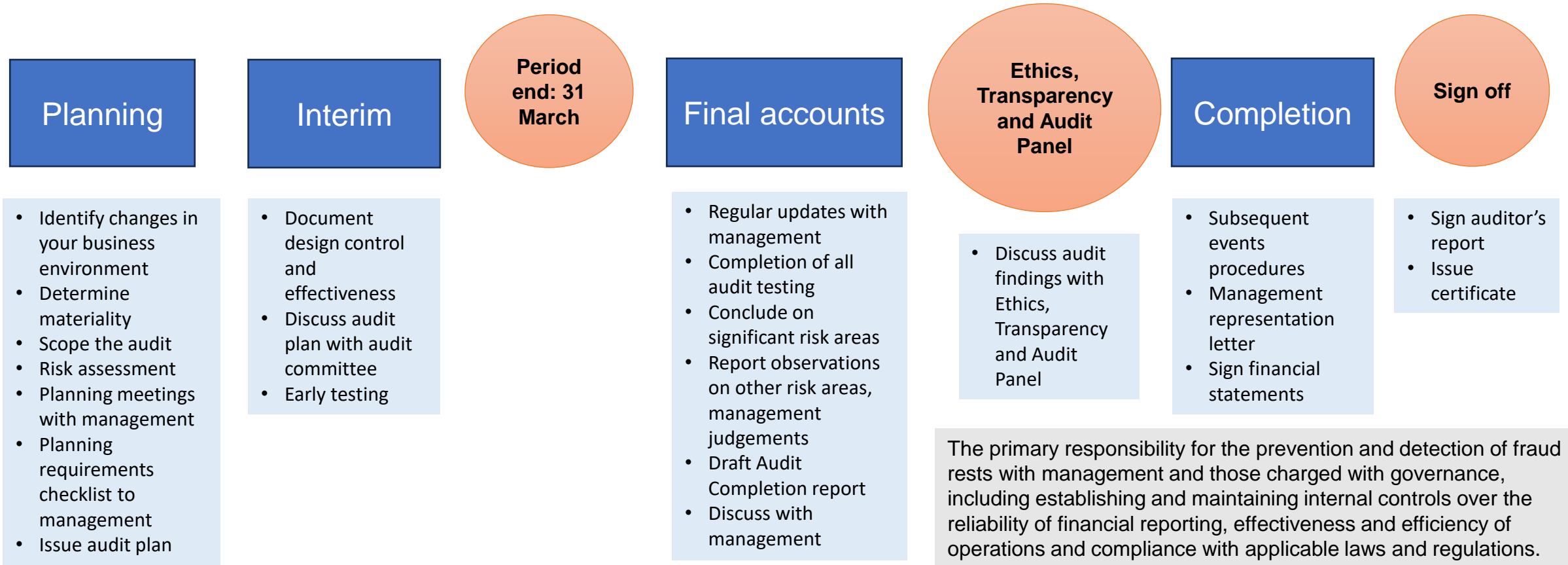
	Build back of specified closing balances through in-year audit				Recovery of closing balances	Recovery of reserves and CIES
	Phase 1				Phase 2 (year and timing to be agreed with management)	Phase 3 (year and timing to be agreed with management)
	2024/25	2025/26	2026/27	2027/28		
Assurance gained over specific balance sheet closing balances which are not inherently tied to the opening balance, EXCEPT FOR pensions IAS19 balance (Phase 1a)	Yes	Yes	Yes	Yes	N/A	N/A
Assurance gained over specific balance sheet closing balances which are not inherently tied to the opening balance, INCLUDING pensions IAS19 balance (Phase 1b)	No	Yes	Yes	Yes	N/A	N/A
Assurance gained over comparator closing balance for specific balance sheet items not inherently tied to the opening balance (Phase 1c)	No	No	Yes	Yes	N/A	N/A
Assurance gained over comparator opening balance for specific balance sheet items not inherently tied to the opening balance (Phase 1d)	No	No	No	Yes	N/A	N/A
Assurance gained over balance sheet balances which are inherently tied to the opening balance – current year closing, prior year closing, prior year opening (Phase 2)	N/A	N/A	N/A	N/A	Yes	N/A
Assurance gained over general fund, earmarked reserves, unusable reserves, collection fund surplus (Phase 3)	N/A	N/A	N/A	N/A	N/A	Yes
Full assurance gained for each phase?	No	No	No	Yes	Yes	Yes
Is missing assurance pervasive?	YES	YES	YES	YES (phase 1 obtained only)	YES (phase 1 and 2 obtained only)	NO (provided also have full phase 1 and 2)
Anticipated opinion	Disclaimer	Disclaimer	Disclaimer	Disclaimer	Disclaimer	Clean
Additional fee – disclaimer	Yes	Yes	Yes	Yes	Yes	No
Additional fee – build back	No	No	No	No	Yes	Yes

# Anticipated audit reports by year

Year	Assurance gained								Anticipated audit report
	Closing balances	Comparator closing balances	Comparator opening balances	Pensions IAS19 closing balance	Pensions IAS19 comparator closing balance	Pensions IAS19 comparator opening balance	Closing balances inherently tied to the opening balance	Reserves	
2024/25	Y	N	N	N	N	N	N	N	Disclaimer
2025/26	Y	Y	N	Y	N	N	N	N	Disclaimer
2026/27	Y	Y	Y	Y	Y	N	N	N	Disclaimer
2027/28 (phase 1 only)	Y	Y	Y	Y	Y	Y	N	N	Disclaimer
2027/28 * (phase 1 and 2 only)	Y	Y	Y	Y	Y	Y	Y	N	Disclaimer
2027/28 * (phase 1, 2 and 3)	Y	Y	Y	Y	Y	Y	Y	Y	Clean

\* Phase 2 (recovery of assurance back to the last clean opinion) and Phase 3 (recovery of general fund and reserves assurance) can be undertaken earlier than 2027/28 should there be sufficient capacity within the audit team and finance team, and subject to agreement of cost for this additional work.

# Our financial statements audit explained



The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance, including establishing and maintaining internal controls over the reliability of financial reporting, effectiveness and efficiency of operations and compliance with applicable laws and regulations. As auditors, we obtain reasonable, but not absolute, assurance that the financial statements as a whole are free from material misstatement, whether caused by fraud or error.

# Materiality

Whilst our audit procedures are designed to identify misstatements which are material to our audit opinion, we also report to those charged with governance and management any uncorrected misstatements of lower value errors to the extent that our audit identifies these. Under ISA (UK) 260 we are obliged to report uncorrected omissions or misstatements other than those which are ‘clearly trivial’ to those charged with governance. ISA (UK) 260 defines ‘clearly trivial’ as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria.

An omission or misstatement is regarded as material if it would reasonably influence the users of the financial statements. The assessment of what is material is a matter of professional judgement and is affected by our assessment of the risk profile of the Chief Constable, PCC & group and the needs of the users. When planning, we make judgements about the size of misstatements which we consider to be material, and which provide a basis for determining the nature and extent of our audit procedures. Materiality is revised as our audit progresses, should we become aware of any information that would have caused us to determine a different amount had we known about it during our planning.

Our assessment, at the planning stage, of materiality for the year ended 31 March 2025 was calculated as follows:

	Group £'000	PCC £'000	CC £'000	Explanation
Overall materiality for the financial statements	6,200	4,900	3,900	3% of gross revenue expenditure for Group and 2% of gross revenue expenditure for PCC & CC based on the draft financial statements as at 31 <sup>st</sup> March 2024. This will be reassessed upon receipt of the draft accounts. <b>We use the lowest materiality figure for all entities in the group</b>  The financial statements are considered to be materially misstated where total errors exceed this value.
Performance materiality	4,300	3,400	2,700	70% of materiality.  Audit work will be performed to capture individual errors at this level. <b>We use the lowest materiality figure for all entities in the group</b>
Trivial threshold	310	245	195	5% of overall materiality. <b>We use the lowest materiality figure for all entities in the group</b>  Individual errors above this threshold are communicated to those charged with governance.

In addition to the above, we consider any areas for specific lower materiality. We have determined that no specific materiality levels need to be set for this audit.

# Significant risks of material misstatement

Significant risks are risks that require special audit consideration and include identified risks of material misstatement that:

- Our risk assessment procedures have identified as being close to the upper range of the spectrum of inherent risk due to their nature and a combination of the likelihood and potential magnitude of misstatement; or
- Are required to be treated as significant risks due to requirements of ISAs (UK), for example in relation to management override of internal controls.

## Significant risks at the financial statement level

The table below summarises significant risks of material misstatement identified at the financial statement level. These risks are considered to have a pervasive impact on the financial statements as a whole and potentially affect many assertions for classes of transaction, account balances and disclosures.

Identified risk	Planned audit procedures
<p><b>Management override of controls - (PCC / Chief Constable / Group)</b></p> <p>Auditing Standards require auditors to treat management override of controls as a significant risk on all audits. This is because management is in a unique position to perpetrate fraud by manipulating accounting records and overriding controls that otherwise appear to be operating effectively.</p> <p>Although the level of risk of management override of controls will vary from entity to entity, the risk is nevertheless present in all entities.</p> <p>Specific areas of potential risk including manual journals, management estimates and judgements and one-off transactions outside the ordinary course of the business.</p> <p><b>Risk of material misstatement: Very High</b></p>	<p>Procedures performed to mitigate risks of material misstatement in this area will include:</p> <ul style="list-style-type: none"><li>• Documenting our understanding of the journals posting process and evaluating the design effectiveness of management controls over journals;</li><li>• Analysing the journals listing and determining the criteria for selecting high risk and/or unusual journals;</li><li>• Testing high risk and/or unusual journals posted during the year and after the draft accounts stage back to supporting documentation for appropriateness, corroboration and to ensure approval has been undertaken in line with the PCC's / Chief Constable's journals policy;</li><li>• Gaining an understanding of the key accounting estimates and critical judgements made by management. We will also challenge assumptions and consider for reasonableness and indicators of bias which could result in material misstatement due to fraud; and</li><li>• Evaluating the rationale for any changes in accounting policies, estimate or significant unusual transactions.</li></ul>

# Significant risks of material misstatement

## Significant risks at the assertion level for classes of transaction, account balances and disclosures

The table below summarises significant risks of material misstatement at the assertion level for classes of transaction, account balances and disclosures.

Identified risk	Planned audit procedures
<p><b>Fraud in revenue recognition and expenditure - (Chief Constable, PCC and group) (rebutted)</b></p> <p>Material misstatement due to fraudulent financial reporting relating to revenue recognition is a rebuttable presumed risk in ISA (UK) 240.</p> <p>Having considered the nature of the revenue streams at the PCC, we consider that the risk of fraud in revenue recognition, comprising largely year-specific taxation or grant funding, can be rebutted due to their nature, as they carry little incentive or ability to manipulate. The Chief Constable's income comprises solely income received from the PCC and the risk of fraud in revenue recognition can similarly be rebutted due to the nature of this income stream.</p> <p>We have also considered Practice Note 10, which comments that for certain public bodies, the risk of manipulating expenditure could exceed the risk of the manipulation of revenue. We have therefore also considered the risk of fraud in expenditure, and we are satisfied that this is not a significant risk for the reasons set out below:</p> <ul style="list-style-type: none"><li>• Significant amount of expenditure is in relation to pay, and</li><li>• non-pay expenditure reflected in the Authority's financial statements exhibits a straightforward nature, characterised by reduced subjectivity, and there is no incentive to management to manipulate expenditure.</li></ul> <p><b>Inherent risk of material misstatement:</b></p> <ul style="list-style-type: none"><li>• <b>Revenue and expenditure recognition: Very Low</b></li></ul>	<p>Whilst we have rebutted the risk of fraud in income and expenditure, we will perform the below procedures based on their value within the financial statements:</p> <ul style="list-style-type: none"><li>• Documenting our understanding of the PCC and Chief Constable's systems for income and expenditure to identify significant classes of transactions, account balances and disclosures with a risk of material misstatement in the financial statements</li><li>• Evaluating the PCC and Chief Constable's accounting policies for recognition of income and expenditure and compliance with the CIPFA Code.</li><li>• Substantively testing material income and expenditure streams using analytical procedures and sample testing of transactions recognised for the year.</li></ul>

# Significant risks of material misstatement

Identified risk	Planned audit procedures
<p><b>Valuation of land and buildings (key accounting estimate) - PCC &amp; group</b></p> <p>Revaluation of land and buildings and investment property should be performed with sufficient regularity so that carrying amounts are not materially misstated.</p> <p>The PCC carries out a rolling programme of revaluations to ensure all property, plant and equipment required to be measured at fair value is revalued at least every three years.</p> <p>Management engage the services of a qualified valuer, who is a Regulated Member of the Royal Institute of Chartered Surveyors (RICS) to undertake these valuations as at 31 March 2025.</p> <p>The valuations involve a wide range of assumptions and source data and are therefore sensitive to changes in market conditions. ISAs (UK) 500 and 540 require us to undertake audit procedures on the use of external expert valuers and the methods, assumptions and source data underlying the fair value estimates.</p> <p>This represents a key accounting estimate made by management within the financial statements due to the size of the values involved, the subjectivity of the measurement and the sensitive nature of the estimate to changes in key assumptions. We have therefore identified the valuation of land and buildings as a significant risk. We will further pinpoint this risk to specific assets, or asset types, on receipt of the draft financial statements and the year-end updated asset valuations to those assets where the in-year valuation movements falls outside of our expectations.</p> <p><b>Inherent risk of material misstatement:</b></p> <ul style="list-style-type: none"> <li>• <b>Land and buildings (valuation): High</b></li> </ul>	<p>Procedures performed to mitigate risks of material misstatement in this area will include:</p> <ul style="list-style-type: none"> <li>• Evaluating management processes and assumptions for the calculation of the estimate, the instructions issued to the valuation experts and the scope of their work;</li> <li>• Evaluating the competence, capabilities and objectivity of management's valuation expert;</li> <li>• Considering the basis on which the valuations are carried out and challenging the key assumptions applied;</li> <li>• Evaluating the reasonableness of the valuation movements for assets revalued during the year, with reference to market data. We will consider whether we require an auditor's expert;</li> <li>• For unusual or unexpected valuation movements, testing the information used by the valuer to ensure it is complete and consistent with our understanding;</li> <li>• Ensuring revaluations made during the year have been input correctly to the fixed asset register and the accounting treatment within the financial statements is correct; and</li> <li>• Evaluating the assumptions made by management for any assets not revalued during the year and how management are satisfied that these are not materially different to the current value.</li> </ul>

# Significant risks of material misstatement

Identified risk	Planned audit procedures
<p><b>Valuation of the defined pension fund net liability/asset (key accounting estimate)</b>  <b>- Chief Constable, PCC and Group</b></p> <p>An actuarial estimate of the net defined pension liability/asset is calculated on an annual basis under IAS 19 'Employee Benefits', and on a triennial funding basis, by an independent firm of actuaries with specialist knowledge and experience. The triennial estimates are based on the most up to date membership data held by the pension fund and a roll forward approach is used in intervening years, as permitted by the CIPFA Code.</p> <p>The calculations involve a number of key assumptions, such as discount rates and inflation and local factors such as mortality rates and expected pay rises. The estimates are highly sensitive to changes in these assumptions and the calculation of any asset ceiling when determining the value of a pension asset. ISAs (UK) 500 and 540 require us to undertake audit procedures on the use of external experts (the actuary) and the methods, assumptions and source data underlying the estimates.</p> <p>This represents a key accounting estimate made by management within the financial statements due to the size of the values involved, the subjectivity of the measurement and the sensitive nature of the estimate to changes in key assumptions. We have therefore identified the valuation of the net pension liability/asset as a significant risk.</p> <p><b>Inherent risk of material misstatement:</b></p> <ul style="list-style-type: none"> <li>• <b>Defined pension fund net liability/asset (valuation): High</b></li> </ul>	<p>Procedures performed to mitigate risks of material misstatement in this area will include:</p> <ul style="list-style-type: none"> <li>• Evaluating managements processes for the calculation of the estimate, the instructions issued to management's expert (the actuary) and the scope of their work;</li> <li>• Evaluating the competence, capabilities and objectivity of the actuary;</li> <li>• Assessing the controls in place to ensure that the data provided to the actuary by the Chief Constable, PCC and their pension fund was accurate and complete;</li> <li>• Evaluating the methods, assumptions and source data used by the actuary in their valuations, with the support of an auditors' expert;</li> <li>• Evaluating whether any asset ceiling was appropriately considered when determining the value of any pension asset included in the financial statements;</li> <li>• Assessing the impact of any significant differences between the estimated gross asset valuations included in the financial statements and the Chief Constable and PCC share of the investment valuations in the audited pension fund accounts' and</li> <li>• Ensuring pension valuation movements for the year and related disclosures have been correctly reflected in the financial statements.</li> </ul>

# Significant risks of material misstatement

Identified risk	Planned audit procedures
<p><b>Implementation of IFRS 16 – Chief Constable, PCC and Group</b></p> <p>IFRS 16 was adopted and implemented by local government bodies under the Code of Audit Practice from 1 April 2024. Under IFRS 16 a lessee is required to recognise a right of use asset and associated lease liability in its Balance Sheet. This will result in significant changes to the accounting for leased assets and the associated disclosures within the financial statements for the year ended 31 March 2025.</p> <p>The implementation of this new accounting standard also represents a key accounting estimate made by management within the financial statements due to the size of the values involved and the subjectivity of the measurement upon recognition of the right of use asset and associated lease liability. We have therefore identified the implementation of IFRS 16 as a significant risk.</p> <p><b>Inherent risk of material misstatement:</b></p> <ul style="list-style-type: none"> <li>• <b>Implementation of IFRS 16 (valuation and completeness): High</b></li> </ul>	<p>Procedures performed to mitigate risks of material misstatement in this area will include:</p> <ul style="list-style-type: none"> <li>• Assess the appropriateness of the PCC and Chief Constable's approach to identification of leases captured within the scope of IFRS 16, with a particular focus on ensuring completeness of leases;</li> <li>• Perform a walkthrough of the PCC and Chief Constable's systems and processes to capture the data required to account for right of use lease assets and associated liability in accordance with IFRS 16;</li> <li>• Review the PCC and Chief Constable's accounting policies for the year ended 31 March 2025 to reflect the requirements of the new accounting standard;</li> <li>• Assess the existence, valuation, accuracy and completeness of the right of use assets and associated lease liabilities, and the related disclosures within the financial statements.</li> <li>• Evaluate whether RoU assets and lease liabilities have been appropriately remeasured in line with the requirements of IFRS 16 as set out in the CIPFA Code.</li> </ul>

# Other risks

## Other material balances and transactions

Under International Standards on Auditing, “irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure”. All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as those adopted for the risks identified in this report.

# Value for money

Under the Code of Audit Practice, we must satisfy ourselves that the PCC, CC & Group has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources (referred to here as “Value for Money”, or “VFM”).

NAO Auditor Guidance Note 03 ‘Auditors’ Work on Value for Money Arrangements’ (“AGN 03”) was updated and issued on 14 November 2024 and requires us to provide an annual commentary on arrangements, which will be published as part of the Auditor’s Annual Report. Such commentary will highlight any significant weaknesses in arrangements, along with recommendations for improvements.



When reporting on such arrangements, the Code of Practice requires us to structure our commentary under three specified reporting criteria:

Financial sustainability	How the body plans and manages its resources to ensure it can continue to deliver its services
Governance	How the body ensures that it makes informed decisions and properly manages its risks
Improving economy, efficiency and effectiveness	How the body uses information about its costs and performance to improve the way it manages and delivers its services

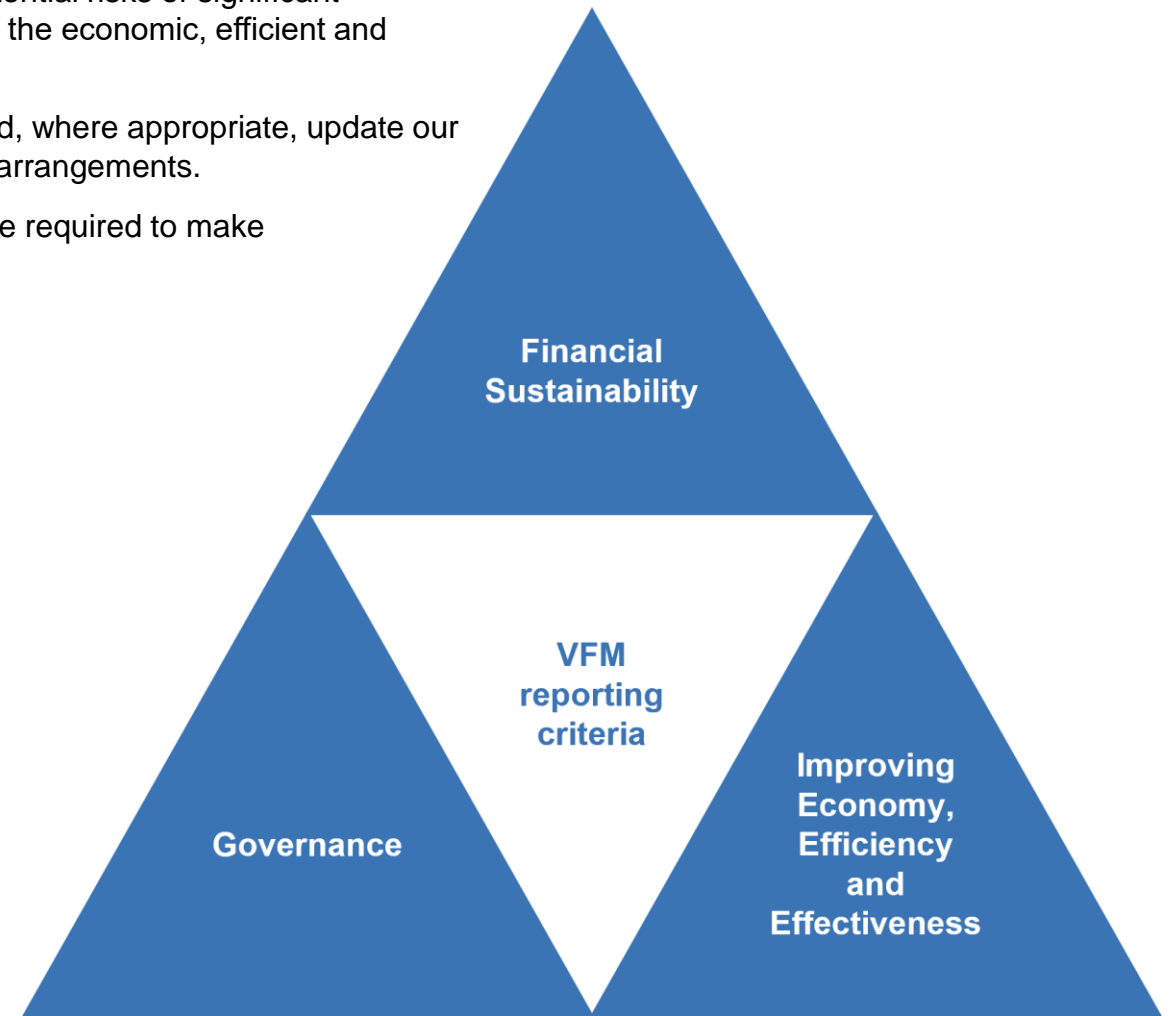
# Value for Money

As part of the planning process, we are required to perform procedures to identify potential risks of significant weaknesses in the PCC and Chief Constable's arrangements to secure VFM through the economic, efficient and effective use of their resources.

We are required to re-evaluate this risk assessment during the course of the audit and, where appropriate, update our work to reflect emerging risks or findings that may suggest a significant weakness in arrangements.

Where we identify significant weaknesses in arrangements as part of our work, we are required to make recommendations setting out:

- Our judgement on the nature of the weakness identified;
- The evidence on which our view is based;
- The impact on the local body; and
- The action the body needs to take to address the weakness.



# Value for Money arrangements

## Risks of significant weakness in VFM arrangements

We have carried out an initial risk assessment to identify any risks of significant weakness in respect of the three specific areas of proper arrangements using the guidance contained in AGN 03. A significant weakness is a risk requiring audit consideration and procedures to address the likelihood that proper arrangements are not in place at the body to deliver value for money.

We will re-evaluate this risk assessment during the course of the audit and, where appropriate, update our work to reflect emerging risks or findings that may suggest a significant weakness in arrangements.

When considering the PCC and Chief Constable's arrangements, we will have regard to the three reporting criteria set out in AGN03, as well as performing additional work in the areas identified below which are the potential areas of significant weaknesses, we have identified at the planning stage.

Criteria	Potential risk of significant weakness	Our risk based procedures and evaluation approach includes (but is not limited to)
Financial sustainability	None identified at this stage.	We have not at this stage identified any risks of significant weakness that require specific audit procedures
Governance	None identified at this stage. The Force was released from the 'Engage' phase of monitoring by HMICFRS in May 2024.	We have not at this stage identified any risks of significant weakness that require specific audit procedures
Improving economy, efficiency and effectiveness	None identified at this stage. The Force was released from the 'Engage' phase of monitoring by HMICFRS in May 2024.	We have not at this stage identified any risks of significant weakness that require specific audit procedures

Weaknesses or risks identified by auditors are only those which have come to their attention during their normal audit work in accordance with the Code of Audit Practice and may not be all that exist.

# Audit team and logistics

## Your audit team

Role	Name	Contact details
Key Audit Partner	Paul Grady	<a href="mailto:Paul.Grady@azets.co.uk">Paul.Grady@azets.co.uk</a>
Engagement Manager	Manpreet Kaur	<a href="mailto:Manpreet.Kaur@azets.co.uk">Manpreet.Kaur@azets.co.uk</a>
In-charge auditor	Charlotte Amos	<a href="mailto:Charlotte.Amos@azets.co.uk">Charlotte.Amos@azets.co.uk</a>

## Timetable

Event	Date
Planning and risk assessment	Feb-March 2025
Reporting of plan to ETAP, PCC and Chief Constable	June 2025
Publication of draft accounts	30 June 2025
Year end audit	Sep – Nov 2025
Auditor's Annual Report (AAR)	Nov 2025
Reporting of Audit Findings (ISA260)	Feb 2026
Target date of approval of accounts	Feb 2026
Accounts publication deadline (as specified in the Accounts and Audit (Amendments) Regulations 2024)	27 Feb 2026

## Our expectations and requirements

For us to be able to deliver the audit in line with the agreed fee and timetable, we require the following:

- Draft financial statements to be produced to a good quality by the deadlines you have agreed with us. These should be complete including all notes, the Narrative Statement and the Annual Governance Statement;
- The provision of good quality working papers at the same time as the draft financial statements. These will be discussed with you in advance to ensure clarity over our expectations;
- The provision of agreed data reports at the start of the audit, fully reconciled to the values in the accounts, to facilitate our selection of samples for testing;
- Ensuring staff are available and on site (as agreed) during the period of the audit;
- Prompt and sufficient responses to audit queries within two working days (unless otherwise agreed) to minimise delays.

The audit process is underpinned by effective project management to ensure that we co-ordinate and apply our resources efficiently to meet your deadlines. It is therefore essential that the audit team and finance team work closely together to achieve this timetable.

.

# Independence, objectivity and other services provided

## Auditor independence

We confirm that we comply with the Financial Reporting Council's (FRC) Ethical Standard and are able to issue an objective opinion on the financial statements. We have also complied with the NAOs Auditor Guidance Note 01, issued in September 2022, which contains supplementary guidance on ethical requirements for auditors of local public bodies. We have considered our integrity, independence and objectivity in respect of audit services provided and we do not believe that there are any significant threats or matters which should be brought to your attention.

## Other services

No other services were provided by Azets to the PCC or Chief Constable.

# Fees

PSAA set a fee scale for each audit that assumes the audited body has sound governance arrangements in place, has been operating effectively throughout the year, prepares comprehensive and accurate draft accounts and meets the agreed timetable for audit. This fee scale is reviewed by PSAA each year and adjusted, if necessary, based on auditors' experience, new requirements, or significant changes to the audited body. The fee may be varied above the fee scale to reflect the circumstances and local risks within the audited body.

Our estimated fee (excluding VAT) is as follows. This fee is estimated based on our understanding at this point in time and may be subject to change. Our planned fee is on the basis that our expectations set out on pages 4 and 27 are met.

Audit fee 2024/25	PCC £	CC £
Base fee for the audit of the financial statements (as set out in the fee scales issued by PSAA)	102,024	52,547
IFRS 16: work needed to audit the new standard. PSAA have confirmed this work is not included in the above scale fee	TBC	TBC
<b>Initial audit fee</b>	<b>102,024</b>	<b>52,547</b>
Disclaimer work ( <b>note 1</b> )	TBC	TBC
Build Back work ( <b>note 2</b> )	TBC	TBC
<b>Total audit fee</b>	<b>TBC</b>	<b>TBC</b>

It is our policy to bill for overruns or scope extensions e.g., where we have incurred delays, deliverables have been late or of poor quality, where key personnel have not been available, or we have been asked to do extra work.

Our policy is to raise fees to account at appropriate stages of the audit in line with specified milestones set out by PSAA. All fee variations are subject to determination by PSAA.

**Note 1:** this includes the additional annual work required to consider the disclaimed audits from prior years, development of revised approach for the PCC, CC & Group in response to the missing assurance, the production, agreement and reporting of additional work to management and the Audit Committee, the development and reporting of a revised 'Audit Completion Report' for reporting the additional considerations arising from the disclaimers, the drafting of a disclaimed audit report and the various risk, compliance and technical consultations arising as a result of this unique and unprecedented situation.

**Note 2:** this includes all work for phases 2 and 3 which require building back assurance to the last clean opinion

# Appendix I: Group audit scope and risk assessment

As Group auditor under ISA (UK) 600 (Revised November 2019) we are required to obtain sufficient appropriate audit evidence regarding the financial information of the components and the consolidation process to express an opinion on whether the group financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework.

## Group audit scope

The Group consists of the following entities:

Component	Significant?	Level of response required	Planned audit approach
Police and Crime Commissioner for Staffordshire PCC	Yes	Comprehensive	Full scope statutory audit
Chief Constable for Staffordshire CC	Yes	Comprehensive	Full scope statutory audit

**Comprehensive:** *The component is of such significance to the Group as a whole that an audit of the component's financial statements is required for group reporting purposes.*

## Risks at the component-level

The risks identified at the PCC and Chief Constable are set out in this external audit plan.



We are an accounting, tax, audit, advisory and business services group that delivers a personal experience both digitally and at your door.

Accounting | Tax | Audit | Advisory | Technology

[hello@azets.co.uk](mailto:hello@azets.co.uk)

Follow us

