



# ESSEX POLICE, FIRE AND CRIME COMMISSIONER, FIRE AND RESCUE AUTHORITY

Efficiency and Cost Savings

Internal audit report: 7.22/23

FINAL

7 June 2023

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# 1. EXECUTIVE SUMMARY

## Why we completed this audit

An audit on the Services Efficiency Savings plan was completed as part of the approved internal audit plan for 2022/23, in order to allow management to take assurance over the effectiveness of the process in place to compile the budget and the savings plan, this included a review of the governance structure in place to ensure that challenge, scrutiny and consistent monitoring is undertaken.

The Finance Manager created a Savings and Efficiencies Tracker to centralise all current and future saving initiatives/projects across a ten year period from 2020/21 through to 2029/2030. The Tracker has been designed to be used on a live basis, updated on a monthly basis to accurately record savings expected and achieved. At the time of the audit, the Tracker contained 36 initiatives/projects including but not limited to: IT communications, vehicle risk protection, legal expenses and fleet overtime. For the period 2021/22 to 2024/25, the Service expects to achieve savings of £5.7m of which £1m is expected to be achieved in 2023/24 as documented within the Medium Term Financial Strategy (MTFS).

During 2022/23, the Service created the Productivity and Efficiencies Board (PEB) to track savings and efficiencies including the monitoring and realisation post-delivery, and to monitor, review and challenge budgets. This is done on a six-weekly basis and is attended by key individuals including budget holders.

We have included examples of best practice in Appendix A for the Service to consider during the maturity of the savings and efficiencies tracking process.

## Conclusion

Noting the efficiency savings process was in its infancy at the Service, overall, we confirmed that the Service has established controls with regards to monitoring and reporting against the budget and savings and efficiency programme through budget management procedures and the governance structure. We confirmed that budget holders were in communication with the finance team during the budget setting process and throughout the year for monitoring the budget and efficiency savings. We confirmed that the savings and efficiencies identified were included in the MTFS and the budget were both reviewed and approved by the PFCC. We confirmed that a robust governance structure had been designed and was operating effectively in relation to the review, challenge and monitoring of the budget and the identification and tracking of savings and efficiencies.

We noted an area of weakness (high priority action) in relation to the validity of savings and efficiencies identified due to timing differences between budget updates, overstatement of savings that should have been removed and input errors in the tracker, with significant variances between the potential savings identified and the underlying assumptions. We also noted other areas of weakness; with differences between the MTFS and the Tracker of £100k, a lack of a formalised validation process and a lack of action tracking for identified savings shortfalls.

In order to strengthen the reliability of the data in the Tracker, the Service may wish to consider implementing some of the areas of best practice identified within Appendix A of this report.

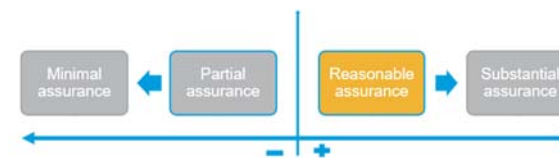
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### Internal audit opinion:

Taking account of the issues identified, the Essex Police, Fire and Crime Commissioner, Fire and Rescue Authority can take reasonable assurance that the controls upon which the organisation relies to manage this area are suitably designed, consistently applied and effective.

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

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## Key findings

We identified the following weakness which resulted in one high priority management action being agreed:



### Savings Initiatives

Through review of a sample of 20 savings initiatives across 2022/23 and 2023/24 taken from the Savings and Efficiencies Tracker as at September 2022, we were provided with the underlying source data to support 19 initiatives. We noted the remaining savings initiative did not have a value assigned and we were informed that it should be removed from the tracker for IT Communications.

Of the 19 remaining savings initiatives, we were able to confirm six instances where the amount on the tracker aligned with source data.

For the 13 remaining cases, we identified discrepancies between the source data and documented figures in the Savings and Efficiencies tracker as follows which we discussed with the finance team:

- Eight variances with a cumulative value of £36k were due to errors of manual input in the tracker;
- Four of the remaining five variances with a cumulative value of £366k were due to timing differences between the budget updates and the input on the tracker, we note the tracker is a live document and as such, historic versions are not retained to support budget amendments; and
- The remaining variance valued at £40k was an overstatement on the tracker for fleet overtime which we were informed should have been removed from the tracker.

Whilst, upon request we were provided with evidence and workings to support the variances, we note that there is a lack of a validation process in place to determine the accuracy and justification for anticipated savings. There is a risk that without accurate rational and justifications recorded of anticipated savings on the tracker itself, the Service cannot make informed financial decisions based upon the financial information provided. **(High)**

**We noted the following controls to be adequately designed and operating effectively:**



**Communication between Finance and Budget Holders – budget formulation and monitoring**

We noted through review of the Non-Pay Spending Allocation Template that there was a tab that covered the budget template and another for savings and efficiency ideas to be completed by budget holders during the budget setting process. We noted that this covered any investment that may be required, estimate of savings that may be generated, benefits and impact. We confirmed for a sample of 10 budget holders that the templates had been completed and we noted through review of screenshots of the finance team's calendar that individual meetings with each budget holder were planned to discuss budgets and savings and efficiency ideas.

We confirmed through review of the Budget Timetable Tracker that notes were being recorded following informal meetings held between finance and all of the budget holders. We were informed and we confirmed through review of screenshots of the finance team's diary that budget review meetings were planned to be held on a recurring basis throughout the year with all budget holders.



**Medium Term Financial Strategy (MTFS)**

We confirmed through review that the MTFS for 2022/23 captured the expected savings for the period 2021/22 to 2024/25 as £5.7m with £1.8m of this captured within 2022/23 and £1m captured for 2023/24. We also confirmed that a £5.2m surplus was identified following core funding, core budget and savings and efficiencies.

We confirmed through review of minutes from the Strategic Board, dated March 2022, that the MTFS was approved by the Police, Fire and Crime Commissioner via a decision sheet which we confirmed through review.



**Budget and savings plan – approval**

We confirmed through review of the Budget Setting Paper as presented to the Strategic Board (chaired by the Police, Fire and Crime Commissioner) in March 2022 included the key assumptions underpinning the preparation of the budget including pay awards, headcount, non-pay costs, funding (council tax and local government) and savings identified from the prior year which totalled £1.09m. We confirmed through review of the decision sheet from March 2022 that the budget had been approved by the PFCC.

We confirmed through review of the March 2023 decision sheet that the PFCC had approved the 2023/24 budget which was identified as a balanced budget with £1.1m of savings built into it.



**Budget accuracy**

Through review of a sample of 10 budgeted figures taken from the 2022/23 budget, with a total value of £39.4m, we were able to trace the data back to source and confirm that data was not aspirational in all ten cases which included but was not limited to whole time pay, operational training item resources, water services and IT communications.



### **Savings and Efficiencies Tracker**

We confirmed through review of the Savings and Efficiencies tracker, that it contained 36 saving initiatives that the Service had identified, and we also confirmed it stated that the Service had saved £4.9m up to October 2022. The saving initiatives included leasing charges, consultancy, property and firefighter pension schemes (for example). We noted that the Tracker had been designed to capture year on year the cumulative savings predicted and achieved across a ten-year period noting any shortfalls for each initiative/project.



### **Benefits assessment**

We were informed by the Finance and Compliance Manager that there is currently not a formal plan in place to assess the quality, impact and benefit of the Savings and Efficiencies Tracker and governance process as a whole. However, there is a governance and review process in place which will be undertaken prior to publishing the Efficiency & Productivity Plan for 2023/24 on the public website in March 2023 which had not yet occurred at the time of our review. Noting that the savings and efficiency tracking process was in its infancy at the time of our review, we have not agreed a management action in this respect.



### **Senior Leadership Team (SLT)**

Through review of SLT meeting minutes from November and December 2022 and January 2023, we confirmed that the Chief Financial Officer presented updates on a monthly finance report which contained a budget update with over and underspends noted in detail.



### **Productivity and Efficiencies Board (PEB)**

Through review of meeting minutes from September (inaugural meeting), October and December 2022, we confirmed that the Services savings tracker was reviewed in the October and December meeting. We noted through review of the September inaugural meeting that this meeting was in place to agreeing with budget holders their respective areas and for the Savings and Efficiencies Tracker to be formalised).

Through review of the Terms of Reference (ToR), we confirmed that it defined the responsibilities, meeting frequency (six-weekly) and was last reviewed at the inaugural meeting in September 2022 and was therefore in date at the time of our review. We confirmed that responsibilities of the PEB included to maintain a central register to record and track service wide savings and efficiencies, and to monitor, review and challenge key budget areas to support the development and agreement of a balanced budget.



### **Performance and Resources Board (PRB)**

Through review of meeting minutes of the PRB meetings between the period of August through to December 2022, we confirmed that Chief Financial Officer presented an update on the budget and savings in each meeting. We confirmed that the initiatives within the savings and efficiency programme and the projects as a whole were being monitored and assessed on a monthly basis.

Through review of the ToR, we confirmed that it defined the responsibilities which included scrutinising, supporting and challenging the overall performance of the fire and rescue service including against the priorities agreed within the Fire and Rescue Plan, monitor actual revenue spend against budget and to monitor the progress made in delivering planned transformation and efficiency savings. Furthermore, we confirmed that the ToR outlined the PRB's meeting frequency (monthly) and was last reviewed in May 2022 and was therefore in date at the time of our review.



### **Strategic Board (PFCC)**

Through review of the PFCC's website, we confirmed the responsibilities of the Strategic Board were documented which included providing strategic oversight of the MTFS.

Through review of three minutes for the Strategic Board (PFCC) meetings between the period of July to September 2022, we confirmed that the Chief Financial Officer presented an update on the budget and MTFS to the PFCC raising awareness of the Savings and Efficiencies Tracker during such meetings.

**We have also agreed three low priority management actions, detailed in section 2 of this report.**

## 2. DETAILED FINDINGS AND ACTIONS

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

Alignment of MTFS and Savings and Efficiencies tracker				
<b>Control</b>	The MTFS for 2022/23 includes predicted savings for the financial year covering the period 2021/22 to 2024/25. The Savings and Efficiencies Tracker has been designed to capture the amount of savings agreed within the MTFS and to be used as a tool to monitor savings through to achievement broken down by initiative/project.	<b>Assessment:</b>		
		<b>Design</b>		✓
		<b>Compliance</b>		✗
<b>Findings / Implications</b>	<p>Through review of the MTFS 2022/23, we confirmed that it documented an overarching savings strategy between the periods of 2021 to 2025, stating that £5.7m (£2.4m identified and £3.3m unidentified) was predicted to be saved during this period.</p> <p>Whilst £2.4m was predicted and detailed within the MTFS as total identified savings, we noted that the Savings and Efficiencies tracker did not align with this, and we noted that £2.3m was listed as the predicted savings for the same period (£100k variance). Whilst we appreciate that the Savings and Efficiencies tracker is a live document, we note that historic data is superseded and removed when savings change and whilst savings predicted may have been adjusted throughout the year, we could not evidence an adequate audit trail to confirm this had been sufficiently rationalised and approved through review of the Tracker.</p> <p>Without an accurate monthly recording of achievable savings with rationale to justify differences from the initial agreement in the MTFS, there is a risk that the Service is not able to achieve its proposed savings which could have a negative financial impact on the Service. Similarly, if the Tracker is being used for decision making purposes, there is a risk of uninformed and inadequate decisions being made.</p>			
<b>Management Action 1</b>	The originally agreed predicted savings from the MTFS will be included in the Savings and Efficiencies Tracker with rationale and justification to support any variances identified via tabs for each month throughout the period.	<b>Responsible Owner:</b>	<b>Date:</b>	<b>Priority:</b>
		Finance and Benefits Manager	31 July 2023	Low

## Recording of savings shortfalls

<b>Control</b>	The Service has a Savings and Efficiencies Tracker in place which captures the savings for a ten year period through to 2029/30 with any shortfalls between predicted savings and actual savings.  Actions for addressing any shortfalls are not currently documented.	<b>Assessment:</b>	
		<b>Design</b>	x
		<b>Compliance</b>	N/A

**Findings / Implications** Through review of the Savings and Efficiencies tracker we identified a total of four saving initiatives in 2022/23 where the Service had identified a shortfall of savings against the initial savings target to the cumulative value of £294k. We noted for three of the four savings initiatives, no action had been documented as having been taken to address the gaps. For the remaining initiative, we were informed by the Finance Manager, that the potential savings were removed and disregarded as costs that had been budgeted for, had increased from the previous year. This was due to price increases, enhanced IT capability and increases in the costs of IT packages.

Noting rationale was not documented on the Tracker, for the three applicable initiatives, we were verbally informed of the following:

- In one case only part of the contract with the supplier and system had been replaced therefore only leaving a small portion still being used and paid for, therefore reducing the savings (£190k);
- In another case, the savings that were initially identified (£74k), had been used to pay for two other full-time employees effectively increasing their pay and reducing the potential savings; and
- In the final case, the savings identified (£30k) were across several cost centres, the projected savings were estimated, and actual achievement of savings will only become evident at the end of the financial year.

Without a set of clear actions to achieve savings that were initially proposed there is a risk that the Service will not achieve its planned efficiencies which could have a negative financial impact with unnecessary cost pressures.

<b>Management Action 2</b>	Action plans will be devised to track and monitor achievement of savings including rectification of any identified shortfalls (where applicable).	<b>Responsible Owner:</b>	<b>Date:</b>	<b>Priority:</b>
		Finance and Benefits Manager	31 July 2023	Low



## Validation of achieved savings

<b>Control</b>	<b>Missing Control</b> - There is currently no process in place for validating that 'savings achieved' have actually been achieved.	<b>Assessment:</b>	
		<b>Design</b>	x
		<b>Compliance</b>	N/A

**Findings / Implications**

Through review of a sample of 20 savings initiatives that had been identified by the Service, we confirmed that within 11 cases savings had been marked as having been realised throughout the year. However we were not provided with evidence to support the validation of the achievement of savings and therefore, we were unable to confirm that the savings had actually been achieved, were valid and were not aspirational.

Through discussion with the Finance Manager, we were informed that a validation process is undertaken, and the process varies depending on the savings initiative/project. Whilst we noted that evidence was provided to support the savings achieved upon request (in the form of budget reports for the majority of the savings), we noted that there is no formalised or documented validation process that is applied consistently in order to determine the validity of all realised savings prior to them being added to the Tracker.

We were informed that there is no formal process for validating achievement of savings and information provided by budget holders is relied upon.

There is risk that savings reported and thus decisions made as a result of financial information may be inaccurate and unverified which could lead to financial implications and an over/understatement of savings achieved.

<b>Management Action 3</b>	We will ensure that the Finance team requests and retains sufficient supporting (source based) evidence to validate savings that have been achieved prior to the Tracker being updated.	<b>Responsible Owner:</b>	<b>Date:</b>	<b>Priority:</b>
		Finance and Benefits Manager	31 July 2023	Low

## Saving initiatives

<b>Control</b>	Savings identified during the 2022/23 budget setting process are tracked within the Savings and Efficiencies Tracker.  Savings are based on justifiable assumptions.	<b>Assessment:</b> <b>Design</b> ✓ <b>Compliance</b> ✗
<b>Findings / Implications</b>	<p>Through review of a sample of 20 savings initiatives across 2022/23 and 2023/24 taken from the Savings and Efficiencies Tracker as at September 2022, we were provided with the underlying source data to support 19 initiatives. We noted the remaining savings initiative did not have a value assigned and we were informed that it should be removed from the tracker for IT Communications.</p> <p>Of the 19 remaining savings initiatives, we were able to confirm six instances where the amount on the tracker aligned with source data (cumulative value £591k).</p> <p>For the 13 remaining cases, we identified discrepancies between the source data and documented figures in the Savings and Efficiencies tracker as follows which we discussed with the finance team:</p> <ul style="list-style-type: none"> <li>• Eight variances with a cumulative value of £36k were due to errors of manual input in the tracker;</li> <li>• Four of the remaining five variances with a cumulative value of £366k were due to timing differences between the budget updates and the input on the tracker, we note the tracker is a live document and as such, historic versions are not retained to support budget amendments; and</li> <li>• The remaining variance valued at £40k was an overstatement on the tracker for fleet overtime which we were informed should have been removed.</li> </ul> <p>In addition, we were unable to confirm whether any of the savings initiatives had been subject to challenge and review prior to being signed off at an appropriate level due to lack of detail within the Tracker. We were informed savings initiatives are driven by completion of the Non-Pay Spending Allocation Template during the budget setting process without a formal selection process based on feasibility and validity.</p> <p>Whilst, upon request we were provided with evidence and workings to support the variances, we note that there is a lack of a validation process in place to determine the accuracy and justification for anticipated savings. There is a risk that without accurate rational and justifications recorded of anticipated savings on the tracker itself, the Service cannot make informed financial decisions based upon the financial information provided.</p>	
<b>Management Action 4</b>	We will retain all supporting data in relation to the documented figures in the tracker and challenge budget holders where source data does not align to the predicted savings amount.  Savings initiatives will be subject to review and scrutiny prior to being added to the tracker in order to assess the validity and feasibility.	<b>Responsible Owner:</b> Finance and Benefits Manager  <b>Date:</b> 31 July 2023  <b>Priority:</b> High

## APPENDIX A: CATEGORISATION OF FINDINGS

Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

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

Area	Control design not effective*	Non-Compliance with controls*	Agreed actions		
			Low	Medium	High
Efficiency and Cost Savings	3 (15)	2 (15)	3	0	1
<b>Total</b>			<b>3</b>	<b>0</b>	<b>1</b>

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

## APPENDIX B: BEST PRACTICE EXAMPLES

We have included some examples of best practice seen amongst our client portfolio below which the Service may wish to consider implementing as part of the efficiencies and savings process:

### **Budgets and General Ledger**

We noted for the Service that several savings predicted were year-on-year savings and as such, instead of being tracked as savings, the Service may wish to consider revising budgets and tracking such reduced expenditure through the general ledger rather than the Tracker itself.

### **Source of initiatives**

Within the Tracker, the Service may wish to consider recording the source of the efficiency, and by whom / which department this has been identified. If the Service records the source of the efficiency, then this will enable clear oversight of effective resources. Through recording by whom the efficiency has been identified, the Service will be able to review the sources of efficiencies to identify whether particular areas or departments are working well, and also where they may be gaps within departments, which can be areas of focus for improvement.

### **Quality Improvement Programme**

In a number of clients, the approach has been taken to identify potential schemes through quality improvement programmes, to ensure that quality remains the focus and that this can be used to identify and thus promote schemes. Whilst efficiency savings may be interpreted as financial savings, by identifying schemes through quality improvement programmes, this has been seen to improve stakeholder buy in.

### **'Dragons Den'**

As above, it has been identified that clients with strong efficiency planning and delivery may be attributed to appropriate buy in, which can be achieved through a perspective of efficiencies not being focused solely on achieving financial targets, but on improving quality and service provision. Our reviews at other clients have seen 'Dragon's Den' inspired exercises, whereby departments present potential efficiency schemes to a team of approvers, who appraise and ultimately decide whether to approve schemes for inclusion in the Tracker.

The development was devolved to a departmental level, and teams were encouraged to engage all staff across the department in similar exercises at the relevant levels, to identify potential schemes which were then presented to the approving team. It is noted that feedback from this exercise was that staff had a better understanding of the process, felt more engaged, and also felt that it encouraged collaborative working, which saw benefit in the creation of additional schemes which were developed by multiple team members.

### **Education and Information Sharing**

A focus within clients which are effective at developing efficiencies and achieving their savings targets, have a strong focus on ensuring that staff across the entire organisation are educated and aware of the impact of efficiencies. This may be linked to the above idea of the involvement of all staff and ensuring staff are aware of the importance of efficiencies, how they can be identified, and how they can contribute or identify ideas.

A further point in regard to ensuring staff are educated and engaged, is to consider the methods and means by which information and knowledge is shared across the organisation. This may be linked with the idea of 'Champions' who may meet regularly with the fellow champions to consider efficiencies they have identified and if these may be transposed into other departments or areas within the Service, to introduce further efficiencies.

### Tracker headings

We note several headings included within other client's savings and efficiencies trackers which were absent from the Service's tracker and, as such the Service may wish to consider inclusion of the following headings with ongoing monitoring to ensure completion of all relevant fields:

- Original estimated savings (at MTFS stage)
- Source location to confirm assumptions used for predicted savings
- Actual savings achieved (per month/quarter) as opposed to overwriting the previous figure, retain all historic savings achieved as a cumulative amount
- Variance (if prediction from MTFS stage differs from current position)
- Rationale for variance (if applicable)
- Action to address variance
- Action owner and target date
- Comments

# APPENDIX C: SCOPE

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

## Scope of the review

The internal audit assignment has been scoped to review how Essex Police, Fire and Crime Commissioner, Fire and Rescue Authority manages the following area.

### Objective of the risk under review

To have adequate processes in place to compile the budget and the Efficiency and Cost Savings plan including an assessment of estimates and assumptions.

A robust governance structure is in place which provides adequate challenge, scrutiny and monitoring of the budget and Efficiency and Cost Savings plan.

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### The following areas will be considered as part of the review:

- We will review the process for the formulation and documentation of the 2022/23 Efficiency and Cost Savings plan and budget setting and identify how this has been aligned to the Medium-Term Financial Plan and other relevant strategic plans;
- For a sample of budgeted figures, we will challenge the underlying/source data including confirmation of the assumptions being used for them as being supported by legitimate information/data ie not aspirational;
- We will review the process for the review, sign off and approval of the 2022/23 budget and Efficiency and Cost Savings plan;
- We will assess the level of savings plans identified and if there is a shortfall of savings required, whether actions are being undertaken to address any gaps;
- We will review that the process for validating savings is based on actuals and not aspirational or forecast savings;
- We will review a sample of saving initiatives as part of the programme and assess whether these are supported by justifiable assumptions and have been consistently and comprehensively documented. We will also consider whether these have been subject to due review and scrutiny prior to being signed off at an appropriate level;
- We will assess the relationship and communication between finance and budget holders during the formulation and monitoring of the Efficiency and Cost Savings plan including in year monitoring of income and expenditure;
- Governance and monitoring arrangements in place to support budget and efficiency and cost savings setting, approval and monitoring, along with investigation and explanation of variances. This will include the Savings and Efficiency Board and the PFCC in terms of oversight and scrutiny;

- For a sample of realised figures recorded and reported to the governance forums, we will confirm accuracy against source/underlying data; and
- Whether the Service has agreed an approach to assessing the quality, impact and benefit of the Efficiency and Cost Savings plan for individual projects and/or the programme as a whole.

**The following limitations apply to the scope of our work:**

- The scope of this work is limited to those areas examined and reported upon in the areas for consideration in the context of the objectives set out for this review. It should not, therefore, be considered as a comprehensive review of all aspects of non-compliance that may exist now or in the future;
- We will not verify the accuracy of the general ledger as part of this review;
- We will not comment on the likelihood of meeting the savings plan;
- As individual figures are not reported to governance forums, only a summary is provided, we did not review data back to source to confirm the accuracy;
- We will not verify the accuracy or completeness of individual transactions on the ledger.
- In addition, the audit will not provide any assurance that savings will be achieved by year end or that services will not suffer as a result of the savings.
- This audit will not provide assurance that financial plans will be achieved.
- Any testing undertaken as part of this audit will be compliance based and sample testing only;
- The results of our work are reliant on the quality and completeness of the information provided to us; and
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.
- We have not determined whether the Service has achieved its predicted savings target for 2022/23.
- We did not reconcile the savings achieved back to the general ledger.

**Debrief held** 26 April 2023  
**Draft report issued** 5 May 2023  
**Revised draft v2 report issued** 6 June 2023  
**Responses received** 6 June 2023  
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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.

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