

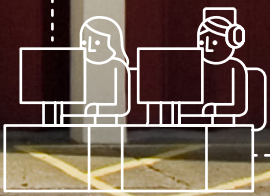
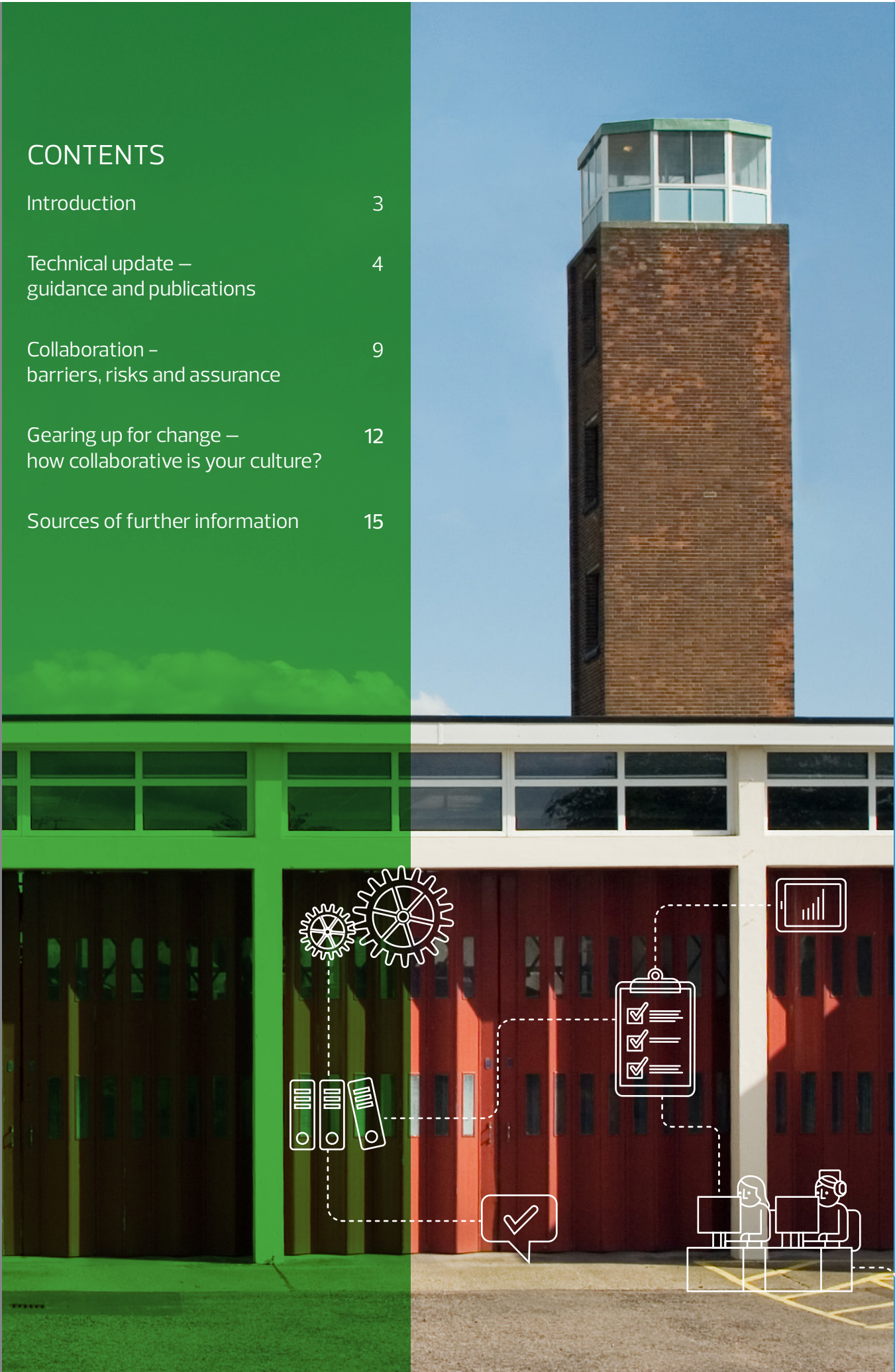


EMERGENCY SERVICES SECTOR UPDATE

September 2017

CONTENTS

Introduction	3
Technical update – guidance and publications	4
Collaboration – barriers, risks and assurance	9
Gearing up for change – how collaborative is your culture?	12
Sources of further information	15



INTRODUCTION

Welcome to RSM's latest emergency services sector briefing which provides a useful source of insight into recent developments and publications affecting the sector.

2017 continues the country's tendency toward political surprises. Since our last briefing, we have seen: a general election produce a hung parliament; the Home Secretary maintain her position (though not without several recounts); a new Minister for Policing and the Fire Service; and the beginning of the Brexit negotiations. It would appear that a hung parliament rules out much of the government's pre-election agenda, with the Brexit negotiations looking set to dictate government resource moving forward.

For the sector, however, developments continue. We look at the recent announcement of HM Inspectorate of Constabulary taking responsibility for inspection of the fire services, and becoming the aptly named HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS). We also look at the current political climate, including what the government's legislative agenda looks like for the sector, with of course a focus on safety following the tragic events at Grenfell Tower.

Delving away from the main news items in the sector, we provide a deeper focus on collaboration. In so doing, we look in detail at some of the collaborations we have seen and the management of risk as more organisations explore collaboration following the Policing and Crime Act 2017. We focus on the importance of culture when gearing up for change. Just how collaborative is your culture? And how can you incorporate cultural change into ways of working?

We hope you find this update a useful source of insight. As ever, if you have any queries, or have any suggestions for topics for future editions, please contact either myself, or your usual RSM contact and we will be delighted to help.

Daniel Harris

National Head of Emergency Services and Local Government



TECHNICAL UPDATE – GUIDANCE AND PUBLICATIONS

Inspectorate takes responsibility for fire inspections

The remit of Her Majesty's Inspectorate of Constabulary (HMIC) is being expanded, with the Inspectorate to take on responsibility for fire and rescue service inspections in England. As a result, HMIC has changed its name and is now HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS).

Nick Hurd, the Minister for Policing and the Fire Service, stated:

'Creating an inspectorate for fire and rescue authorities in England will support the continuous improvement of this critical public service to make sure that services are as professional, effective and as efficient as possible. It will also ensure where problems are identified, actions can be taken by the fire and rescue authorities to overcome them.'

In taking the same approach to police inspections in England and Wales, FRS inspections will be 'risk-based and proportionate' and focus on effectiveness, efficiency and leadership, with services judged as outstanding, good, requires improvement or inadequate. HMICFRS will consult the sector on the proposed inspection regime and pilot inspections will take place to allow for the approach to be tested with every authority in England to be inspected by the end of 2019.

Further to this joined up approach for inspections, the government will continue its reform programme for fire, which features several different elements including:

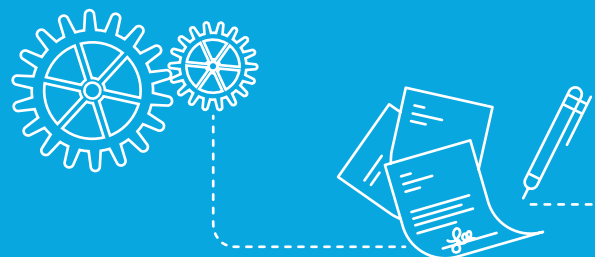
- the formation of a professional standards body for fire and rescue 'which will build a comprehensive professional framework of standards';
- reforming the workforce to make it more 'highly skilled, modern, flexible and diverse';
- creating a national website to increase transparency on topics like chief officer pay and expenditure; and
- the publication of incident level data that the public can access.

Questions for Audit Committee's considerations

- Have you considered how your organisation performs and compares in terms of effectiveness, efficiency and leadership?
- Have you made improvements following peer review?
- Have you talked to your Police colleagues about the Police inspection regime to consider any shared learning?
- Are you keeping up to date with the pilot inspections to be able to undertake self-assessments against the new requirements?

Questions for Audit Committee's considerations

- Have you considered the impacts of the reform programme for fire including those identified here?



The political climate

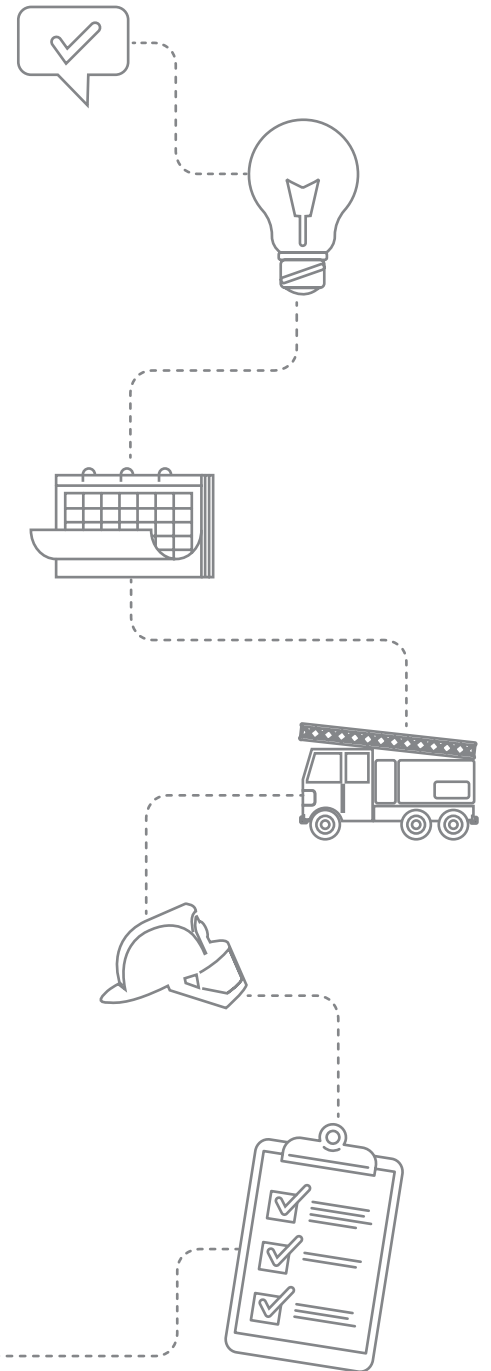
As parliament returns from summer recess, it is pertinent to take stock of the political events since our last briefing. From being able to pass through such major pieces of legislation as the Policing and Crime Act 2017, and all the changes it entails, the government is now in a fragile position, supported by a confidence and supply deal with the Democratic Unionist Party in Northern Ireland. This position was noticeable in the Queen's Speech, with many key pledges and commitments made pre-election by the government noticeable by their absence. Brexit is of course the key item for the government and negotiations have begun. It is clearly apparent though, that given the considerable resource needed in Whitehall, that other agenda items have been relegated. Here are some of the main items for the police and fire sectors from the Queen's Speech:

- a 'domestic violence and abuse bill' will aim to transform the approach to domestic violence and abuse, which will include measures to protect victims and give the justice system greater guidance and clarity;
- a 'data protection bill' which will enact the requirements of the General Data Protection Regulation and the new Directive which applies to law enforcement data processing. This will aim to ensure the UK meets its obligations as part of the EU and maintains the ability to share data upon Brexit;
- a counter terrorism review will take place 'to ensure that the police and security services have all the powers they need'; and
- the establishment of a public inquiry into the tragic events at Grenfell Tower.

In relation to this latter point the government has confirmed there will be an independent review of building regulations and fire safety. We look at this later on in this briefing.

Questions for Audit Committee's considerations

- Have you considered the potential changes from the Queen's Speech and what these may mean for you?
- Are you prepared for the General Data Protection Regulation changes and are you confident your arrangements will be in place by May 2018?



POLICE

Statistics and data

The Office for National Statistics (ONS) has published a number of data sets for the year ending 31 March 2017, whilst forces have also been publishing their use of force data.

Crime in England and Wales

Excluding the experimental statistics of fraud and computer misuse, the estimates of the Crime Survey for England and Wales indicate there were 5.9 million incidents of crime, a seven per cent reduction on the previous year. However, include fraud and computer misuse offences and this rises to 11 million incidents, though the ONS is clear that valid year on year comparisons on statistics including fraud and computer misuse will not be available until January 2018, when two full years of data has been collected.

Yet the picture painted by actual police recorded crime figures is quite different, with data highlighting a 10 per cent rise in the number of offences recorded, which the ONS explains is due to: the continued improvements made in recording procedures; expanded offence coverage; and a 'genuine increase in some crime types.'

Questions for Audit Committee's considerations

- Have you reviewed your own Force's trends and what action the Force needs to take as a result?

Police workforce data for England and Wales

The number of police officers has reduced to 123,142 which is not only a 0.7 per cent reduction since 31 March 2016, but is 'the lowest number of police officers at the end of a financial year since comparable records began in 1996' according to the ONS report. In thinking about the wider police workforce more broadly, from March 2016 to March 2017, there has been a reduction in the number of police staff, community support officers and special constables. The only exception has been designated officers, whose numbers have increased from 4,130 in 2016 to 4,255 in 2017.

Diversity in the police of course continues to be a key issue. In previous briefings, we reported on the Home Affairs Committee report on police diversity which called for 'urgent and radical action.' Encouragingly, the statistics do show a continuing upward trend in the proportion of police officers who are Black and Minority Ethnic (BME), with 6.3 per cent of all officers BME at 31 March 2017, a 0.4 percentage point increase since 31 March 2016, the largest recorded in the dataset which dates back to the year ending 31 March 2008.

On use of force statistics, several news outlets quoted the Operational Lead on Policing for the Police Federation, Simon Kempton, who called the new use of force reporting requirements 'staggeringly bureaucratic', with a risk that officers could be 'sat behind desks rather than stood in their communities.' Mr Kempton also remarked that some forces had more up-to-date software and systems to allow the time spent by officers filling out forms to be minimised. The media attention to the issue drew an interesting response from the Home Office who stated that the new requirements are 'police led' with no rules being imposed by the Home Office other than an expectation that forces will oblige in accurate reporting of their use of force.

State of policing

HM Inspectorate of Constabulary (HMIC) has published its annual assessment of policing in England and Wales for 2016. The 131 page report brings together HMIC's activity for the year with a particular mention given to the 'too large a role' the police currently face in dealing with people suffering from mental ill-health; calling for mental health to be given the 'same priority' as physical health in resources and funding.

Questions for Audit Committee's considerations

- Have you considered how mental ill-health links to the Police and Crime Plan priorities and what this means for the resources and grants allocated?
- Have you got strong relationships with key local agencies to maximise care for people suffering with mental ill-health and ensure that all agencies are contributing to the support provided?

Media relations

Police forces across England and Wales have been issued with new guidance designed to promote openness, transparency and a professional approach to working with media. The College of Policing's Media Relations Authorised Professional Practice comes after consultation involving the media, public and police forces and features guidance on: defining speaking terms; managing inaccurate or misleading media coverage; and naming on arrest, amongst many others.

Questions for Audit Committee's considerations

- Have you reviewed your approach to working with the media?
- Have you considered the new guidance in your policies and procedures?

Evidence disclosures

The results of a joint inspection carried out by Her Majesty's Crown Prosecution Service Inspectorate and HMIC, regarding the disclosure of unused material¹ during prosecutions, has been published. The 'disclosure of unused material is a key component of the investigative and prosecution process' and all unused items held by the police should be considered and reviewed to determine whether 'it is capable of undermining the prosecution case or assisting the defence.' The inspection highlighted 'extensive issues' with the manner in which unused material is recorded, with 22 per cent of 'schedules found to be wholly inadequate.' There was also evidence highlighting a failure of prosecutors to challenge substandard schedules, with a 'culture of acceptance prevailing.'

Questions for Audit Committee's considerations

- Have you received assurance on evidence disclosures within the Force and the recording of these?

¹Material of any kind, including information and objects, which is obtained or inspected in the course of a criminal investigation and which may be relevant to the investigation.





FIRE

Review of regulations and safety

In the aftermath of the tragic events that took place at Grenfell Tower, the government has confirmed there will be an independent review of building regulations and fire safety. Principally the review will examine:

- the regulatory system around the design, construction and on-going management of buildings in relation to fire safety;
- related compliance and enforcement issues; and
- international regulation and experience in this area.

The Secretary of State for Communities and Local Government, Sajid Javid, stated:

'It's clear we need to urgently look at building regulations and fire safety. This independent review will ensure we can swiftly make any necessary improvements. Government is determined to make sure that we learn the lessons from the Grenfell Tower fire, and to ensure nothing like it can happen again.'

Chairing the review will be Dame Judith Hackett, who spoke of her keenness to engage widely with the sector, with recommendations that the government will act on. The final report is expected no later than spring 2018 with the government promising 'swift action'.

New Fire Minister speech

At the Fire Safety Confederation the new Minister of State for Policing and the Fire Service, Nick Hurd, has given his first major speech, with the focus primarily on the Grenfell Tower tragedy. Mr Hurd spoke of the independent expert advisory panel which is giving the government advice on immediate measures required to keep high-rise residents safe. Mr Hurd also spoke of the role of the fire service and its position to 'advise property owners and their residents about fire risks and what to do to reduce them' and confirmed that the government will work with the sector to see if any potential changes need to be made to the fire safety audit regime.

Questions for Audit Committee's considerations

- How is the service discharging its responsibility to 'advise property owners and their residents about fire risks and what to do to reduce them'?
- How do you compare and contrast your approach with other fire authorities?
- Has a budget and programme of action been agreed for this area?

COLLABORATION: BARRIERS, RISKS AND ASSURANCE

The Policing and Crime Act 2017 places a statutory duty on police, fire and ambulance services to keep collaboration opportunities under review and enter into collaboration when it is in the best interests of efficient and effective service delivery.

HMICFRS defined collaboration as:

'all activity where two or more parties work together to achieve a common goal, which includes inter force activity and collaboration with the public and private sectors, including outsourcing and business partnering.'

We have found that collaboration across the emergency services has already been seen in a number of initiatives such as:

- sharing headquarters;
- joint vehicle workshop/fleet procurement and management;
- shared training centre;
- joint control rooms;
- Multi Force Shared Service;
- Emergency First Response;
- Community Safety Responders;
- internal audit services; and
- consulting and advisory services.

The Emergency Services Collaboration Working Group issued a National Overview report at the end of 2016 which set out many examples of collaborative working both across the emergency services and with wider partners and organisations; how the schemes were implemented in practice, and the benefits realised to date.

(<https://www.gov.uk/government/publications/policing-and-crime-bill-emergency-services-collaboration>)

As ideas and opportunities to collaborate across public services and beyond become greater, there are a number of factors that need to be considered to ensure that joint working arrangements are subject to the required planning, approval and continuous review, to enable the required outcomes and benefits to be realised, both financially and non-financially. We have identified a few of the areas below that you should consider when thinking about your potential collaborative arrangements.

Business case/planning

Throughout our work to support the emergency services sector as they develop their arrangements for collaborative activities, we have seen good practice in the preparation, scrutiny and approval of business cases at the outset. However, we have identified a need to further improve on the identification of measurable objectives, and the setting of financial plans based on realistic costing, rather than the required savings.

It is also worth noting that we have so far identified a lack of thorough and transparent due diligence being undertaken when entering collaborative arrangements. This is not seen as an essential requirement when dealing with other public bodies, however, as the collaborative remit expands to include private organisations, it would be prudent to have due diligence arrangements in place.

Collaborative agreements

To be able to deliver and meet the set requirements of a collaborative project, there must be signed agreements in place between all partners, which set out clear deliverables and performance measures to which partners are held to account. These agreements should be reviewed and refreshed periodically as the project progresses to account for changing or additional project streams and ensure that the performance measures are providing the information and benefits required.

Governance, risk management and assurance

Performance against the deliverables will form a basis for regular reporting via the governance framework which needs to be established at the outset. Governance arrangements need to reflect the size and complexity of the collaboration and the partners involved, and be able to be flexible to the project as it progresses and as the scrutiny and oversight requirements change from a project in progress to business as usual. One approach we have seen working well is a tiered governance structure with an overview (separately) at both an operational and strategic level. However, you must be careful to avoid duplication of work and ensure clear decision making and delegation arrangements are in place.

Whether collaboration risks are managed via a central project risk register, or via the individual organisation risk registers is a matter of debate. We tend to see overarching strategic risks around establishment, delivery and efficiency achievements of collaborations on organisational registers. We would also expect the project to have its own operational risk register which is scrutinised via the governance framework. This is where assurance sources should flow to inform senior officers and staff of whether the project is delivering, and to flag any issues at an early stage.

Importantly, each individual organisation should also have its own mechanisms in place to gain assurance over the outcomes, benefits and effectiveness of the control environment being achieved from the collaborative project, against the resource being put in. One risk we have identified is that when multiple forces are working together, there is a tendency to rely on other forces to be providing or monitoring the assurance, and without a defined assurance map there is a potential for things to slip through the net.

We have seen good practice in this area where the collaborative organisations have worked together to develop joint collaborative internal audit plans which have been discussed and agreed with individual organisations and the Audit Committees. To support this area further, some collaborations have held Joint Audit Committee meetings including members from all organisations to discuss the assurances received through the 3rd line of defence, including the Internal Audit Service, to establish if those assurances received cover the key issues and risks. This is also an opportunity to discuss what assurances have been received so far, what this means for each organisation and further assurances required if necessary. Furthermore we have found that this can be a useful forum for Audit Committees to get updates on some of the complex areas of the organisation and progress made in the collaboration of them.

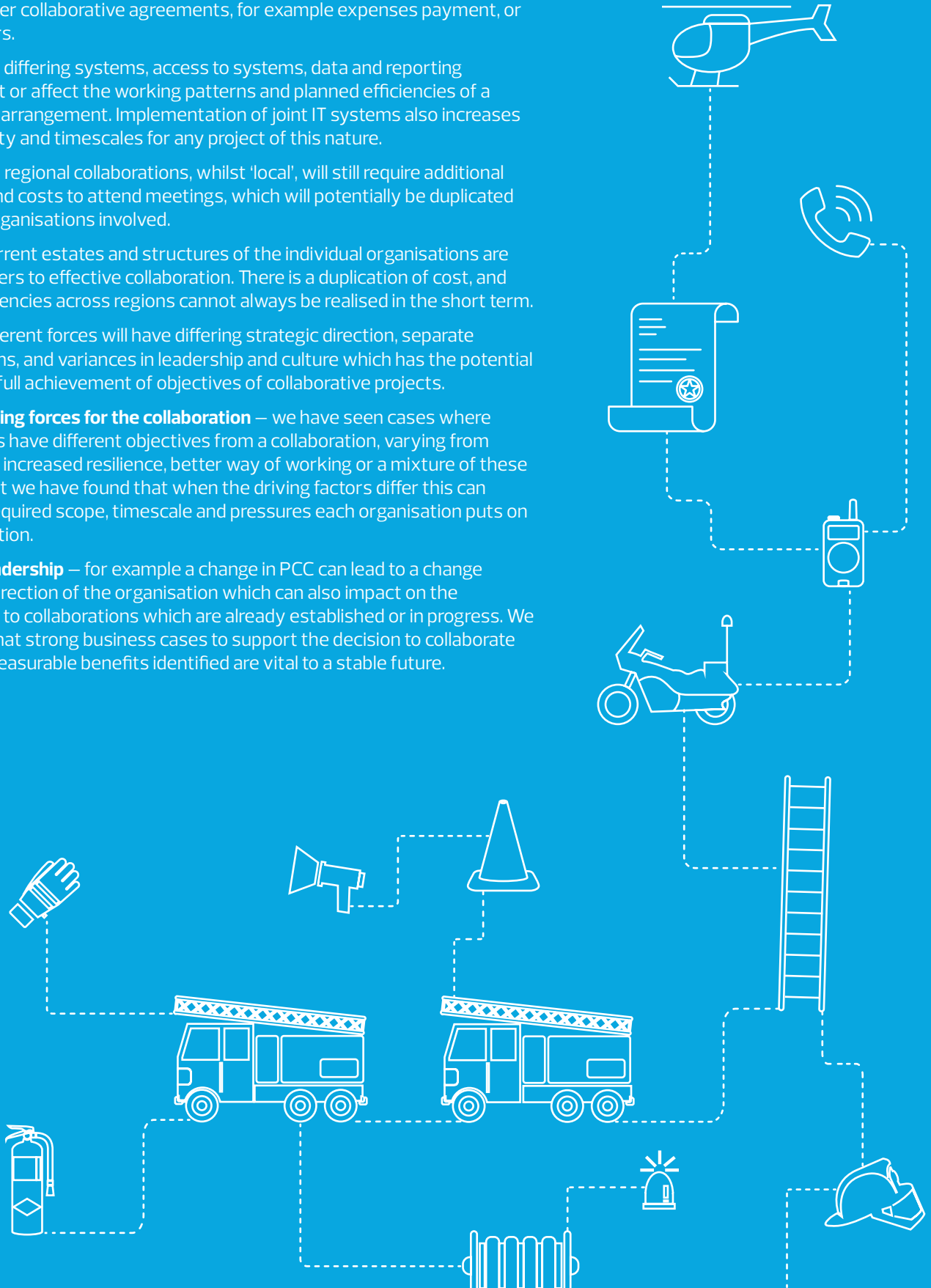
Cost / benefit analysis

The organisation involved in each collaboration project should be working towards the agreed objectives and measures, which are set out in clearly defined metrics, whilst delivering against the financial plan and not use statistics that have not been agreed by other members or which meet their own requirements but potentially not the requirements of other collaborative partners. This can be difficult to agree when each party may have differing driving forces and requirements for the collaboration, but crucial to the achievement of the collaboration itself. Periodically there needs to be a formal review of the cost v benefit of the collaboration, to ensure that it is in line with both service delivery and efficiency plans, and to put remedial actions into place if not. This should be reported via the governance framework to allow for effective discussion and clear, transparent decisions to be made.

Barriers to effective collaboration

We have observed a number of barriers to effective collaborative working that should be considered when entering into new arrangements:

- **Terms and conditions of employees** – these may differ between each organisation and could cause potential conflicts between staff working together under collaborative agreements, for example expenses payment, or working hours.
- **IT systems** – differing systems, access to systems, data and reporting may interrupt or affect the working patterns and planned efficiencies of a collaborative arrangement. Implementation of joint IT systems also increases the complexity and timescales for any project of this nature.
- **Geography** – regional collaborations, whilst 'local', will still require additional travel time and costs to attend meetings, which will potentially be duplicated across the organisations involved.
- **Estates** – current estates and structures of the individual organisations are seen as barriers to effective collaboration. There is a duplication of cost, and estates efficiencies across regions cannot always be realised in the short term.
- **Culture** – different forces will have differing strategic direction, separate Business Plans, and variances in leadership and culture which has the potential to affect the full achievement of objectives of collaborative projects.
- **Differing driving forces for the collaboration** – we have seen cases where organisations have different objectives from a collaboration, varying from cost savings, increased resilience, better way of working or a mixture of these elements. But we have found that when the driving factors differ this can impact the required scope, timescale and pressures each organisation puts on the collaboration.
- **Change in leadership** – for example a change in PCC can lead to a change in strategic direction of the organisation which can also impact on the commitment to collaborations which are already established or in progress. We have found that strong business cases to support the decision to collaborate with clear, measurable benefits identified are vital to a stable future.





GEARING UP FOR CHANGE – HOW COLLABORATIVE IS YOUR CULTURE?

Too often organisations get caught up in the process of change, rather than considering and planning for what happens after the process is complete and the impact this can have on employees.

'Culture' by definition is frequently linked to high level theoretical models, concepts and academic narratives, rather than being viewed more practically as 'the heart and soul of a business', driving through at every level the values, beliefs and ethos of what it is about.

Changes in any working environment can create uncertainty and this can lead to negativity, reducing employee engagement and ultimately disruption. It is important therefore that organisations think about change before it happens and consider the best communications approach possible, so that employees at all levels understand and buy-in to the strategy and direction of travel before, during and after any change process.

Collaborative leadership programmes that have been commissioned by public sector organisations around the UK, show the importance of creating the right kind of cultural environment for working across organisational boundaries. When this is evident this has a direct impact on employee engagement and productivity.

When Police and Crime Commissioners and Fire and Rescue Authorities are considering their readiness for collaborative arrangements, whether for local initiative programmes of local or full mergers, they should ensure that these cultural people aspects are assessed, developed and factored into implementation plans.

How do you measure culture?

Even though academics and consultants have devised various theoretical models to help define and analyse what culture is, it can still seem like a nebulous concept – a complex web of human attitudes, motivations, behaviours and opinions. How can you really understand whether 'the way things are done around here' matches expectations and will support wider strategic objectives? There is no simple answer, although culture in any organisation should represent the 'core' of what the organisation is about, it's very being.

In the context of assessing how collaborative an existing culture is, an off-the-shelf cultural audit would provide some clues, but it wouldn't test for the specific attitudes and behaviours that are demonstrated, or required to make a practical difference. The best way of measuring this is to get feedback from those who have experienced it first hand:

- the employees;
- the public;
- customers;
- collaborating organisations; and
- suppliers.



Direct feedback can be collated from a range of sources including internal and external surveys, focus groups, people related information held within HR, service user compliments and complaints and supplier evaluations.

To generate meaningful and actionable results the aim should be to understand the presence of both enabling and hindering cultural characteristics to identify those which can be leveraged, those that need to be developed, and those that need to be phased out.

Why does it matter?

It might be assumed that emergency services organisations are similar in the types of attitudes and behaviours found within the workforce. Whilst there are some commonalities of purpose, values and ethos, there are so many factors which influence 'culture' that give every workplace a distinctive look and feel. For example, even sub-cultures will be visible at local station level.

In any team, there will be positive and negative influences which will either encourage or hinder cultural alignment and progression. Some would argue that it is better to know what you are dealing with and encourage different approaches and increased engagement, rather than leaving it to chance and therefore running the risk that negative energies will encourage resistance to change and disruption. In this respect communication strategies surrounding change should be carefully thought through to ensure that people are informed and taken on the journey as the organisation evolves.

How can we incorporate cultural change into ways of working?

Once the current position and specific organisational challenges are understood, a targeted programme of organisational development and cultural change can be progressed, ideally working alongside specialist HR Consultants with expertise in this area. This programme could initially focus on three core areas.

- 1** Strategic leadership: developing a clear strategic direction for the business that defines the organisational culture and encourages buy-in from employees at all levels.
- 2** Communication and employee voice: developing a successful two-way dialogue which enables employees to openly share their thoughts and opinions with senior managers, as well as cascading communications and updates from the top, therefore promoting transparency, consistency and fairness, which lead to greater engagement and increased openness to change.
- 3** Manager development: enabling line managers to drive performance in a positive, proactive manner that moves away from the more traditional 'command and control' approach, often associated with the emergency services. This can be achieved by equipping and empowering managers to lead change scenarios, by giving them more responsibility for the messaging and leading by example.



SOURCES OF FURTHER INFORMATION

'HMIC to extend inspection remit to fire & rescue services'

– HM Inspectorate of Constabulary and Fire & Rescue Services

<https://www.justiceinspectorates.gov.uk/hmicfrs/news/news-feed/hmic-to-extend-inspection-remit-to-fire-and-rescue-services/>

The Queen's Speech 2017: background briefing notes

– Cabinet Office and Prime Minister's Office

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/620838/Queens_speech_2017_background_notes.pdf

'Crime in England and Wales: year ending Mar 2017'

– Office for National Statistics

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmar2017>

'Police Workforce, England and Wales, 31 March 2017'

– Home Office

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/630471/hosb1017-police-workforce.pdf

'Police diversity' – House of Commons, Home Affairs Committee

<http://www.publications.parliament.uk/pa/cm201617/cmselect/cmhaff/27/27.pdf>

'Police criticise 'staggering' bureaucracy for recording use of force' – Sarah Marsh (The Guardian)

<https://www.theguardian.com/uk-news/2017/jul/08/police-criticise-staggering-bureaucracy-for-recording-use-of-force>

'The Home Office's response on police use of force data'

– Home Office

<https://www.gov.uk/government/news/the-home-offices-response-on-police-use-of-force-data>

'State of Policing, the annual assessment of policing in England and Wales 2016'

– HM Chief Inspector of Constabulary

<https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/state-of-policing-2016.pdf>

'Media Relations' – College of Policing

<https://www.app.college.police.uk/app-content/engagement-and-communication/media-relations/>

'Making it Fair: The Disclosure of Unused Material in Volume Crown Court Cases' – HM Crown Prosecution Service Inspectorate & HM Inspectorate of Constabulary

<http://www.justiceinspectorates.gov.uk/cjji/inspections/making-it-fair-the-disclosure-of-unused-material-in-volume-crown-court-cases/>

'Independent review of building regulations and fire safety'

– Department for Communities and Local Government

<https://www.gov.uk/government/news/independent-review-of-building-regulations-and-fire-safety>

'Fire Safety Conference 2017: Fire Minister's speech'

– Nick Hurd MP

<https://www.gov.uk/government/speeches/fire-safety-conference-2017-fire-ministers-speech>



FOR MORE INFORMATION, PLEASE CONTACT:

Daniel Harris

National Head of Emergency Services
and Local Government

M +44 (0)7792 948 767
daniel.harris@rsmuk.com

Nicki Barnes

Director, HR

T +44 (0)7557 505 668
nicki.barnes@rsmuk.com

Emma Griffiths

Managing Consultant,
Technical Risk Advisory

M +44 (0)7528 970 287
emma.griffiths@rsmuk.com

Deborah Payne

Associate Director,
Transformational Change

M +44 (0)7436 268 701
deborah.payne@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 Corporate Finance LLP, RSM Restructuring Advisory LLP, RSM Risk Assurance Services LLP, RSM Tax and Advisory Services LLP, RSM UK Audit LLP, RSM UK Consulting LLP, RSM Employer Services Limited, 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 members of 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 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. Baker Tilly Creditor Services LLP is authorised and regulated by the Financial Conduct Authority for credit-related regulated activities. RSM & Co (UK) Limited is authorised and regulated by the Financial Conduct Authority to conduct a range of investment business activities. 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.