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Date: 26 September 2019

JOINT INDEPENDENT AUDIT COMMITTEE

You are requested to attend a meeting of the Joint Independent Audit Committee on Friday 4 October 2019 in the Conference Hall, Police Headquarters South, Kidlington at 10.30am.

Yours sincerely

A handwritten signature in black ink, appearing to read "Paul Hammond".

Paul Hammond
 Chief Executive

To: Members of the Joint Independent Audit Committee

Agenda Item

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1.	Minutes of the last meeting held on 12 July 2019	3 - 16
2.	Actions/Matters update spreadsheet	17 - 18
3.	TVP Risk Management Report (presentation by Dr Steven Chase) <ul style="list-style-type: none"> <i>An overview of risk management and internal controls within the people directorate, with particular reference to:</i> <i>* strategic workforce planning including measures to increase effectiveness of recruitment and retention and the vacancy rate both Officers and staff;</i> <i>* comment on audit reports, including the 'limited assurance' report on the acting up report;</i> <i>* unresolved agreed audit actions, including two outstanding from an audit originally conducted in 2016/17; and</i> <i>* What are the critical strengths and weaknesses of TVP People strategy and its implementation including how TVP benchmarks itself against people directorate performance in other comparable forces, and what his priorities are for improving effectiveness?</i> 	-
4.	TVP Risk Management & Business Continuity Update	19 – 66
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7.	Ernst & Young Police Sector Audit Committee Briefing	105 – 116

8.	Progress on 2018/19 Internal Audit Plan Delivery and Summary of matters arising from completed audits to include findings and recommendations in the HMICFR Fraud Report	117 - 128
9.	Progress on Delivery of agreed actions in Internal Audit Reports	TO FOLLOW
10.	AOB	-

Date of next meeting 18 December 2019 at 10.30am in the Conference Hall, Thames Valley Police Headquarters HQ South

MINUTES OF A MEETING OF THE JOINT INDEPENDENT AUDIT COMMITTEE HELD AT POLICE HEADQUARTERS, KIDLINGTON ON 12 JULY 2019 COMMENCING AT 10.30AM AND CONCLUDING AT 3:15 PM

Members Present:

Dr L Lee (Chairman), Mike Day, Richard Jones, Alison Phillips OBE, Dr G A Woods

Present:

J Hogg (Deputy Chief Constable)
 R France (Chief Supt.)
 L Waters (Director of Finance)
 P Hammond (Chief Executive, OPCC)
 I Thompson (Chief Finance Officer, OPCC)
 N Shovell (Chief Internal Auditor, TVP & OPCC)
 A Shearn (Principal, Auditor, TVP & OPCC)
 M Peulevé (Head of Joint Information Management)
 G King (ICT Department)
 A Balmer (Manager, Ernst & Young)
 S Patel (Associate Partner, Ernst & Young)
 M Horne (Governance & Service Improvement)
 N Wickham (Property Services Energy Manager)
 N Pankhania (Business Partner – Diversity and Inclusion, People Directorate)
 P Paling (Head of Department, Health & Safety & Environment)
 N Brown (Head of Employment and Wellbeing, People Directorate)
 J Banks (Principal Accountant, OPCC)
 C Roberts (Executive Assistant to the PCC/DPCC, OPCC)

Others Present:

Melvyn Neate (JIAC Chair for Hampshire, Observer)

Apologies:

A Stansfeld (Police & Crime Commissioner)
 M Barber (Deputy Police & Crime Commissioner)
 J Campbell (Chief Constable)
 R Mears (Supt.)
 M Underwood (Property Services Facilities Manager)
 A Cooper (Director of Information)
 C Kirby (Head of People Innovation and Change)
 P Wooding (Strategic Governance)
 C Hemmings (Head of Governance & Service Improvement)
 C Ward (T/ACC Local Policing TVP)

APOLOGIES

The Chair (Louis Lee) (LL) welcomed all attendees and introductions were made. Apologies were given for those who could not attend today's meeting.

1. ELECTION OF JIAC CHAIRMAN FOR 2019/20

The Committee members nominated (LL) to continue as Chairman of the JIAC for 2019/20 which was accepted.

2. MINUTES FROM THE LAST JIAC MEETING HELD ON 15 MARCH 2019

The Minutes of the meeting held on 15 March 2019 were briefly summarised, approved and agreed by the Committee. However, Richard Jones (RJ) referred to his comments set out on page 3, third paragraph of the OPCC Risk Register in that a lot of organisations had already completed GDPR.

Reference was made to Minute 111 and 113 as they did not appear to be shown on the 'Actions' log and an update would be required. However, Neil Shovell (NS) confirmed that these actions were in fact complete and had been noted. The action for Minute 113 was included in the Part II agenda paper.

3. MATTERS/ACTIONS UPDATE ARISING FROM 15 MARCH 2019

All actions from the meeting on 15 March 2019 had now been completed and the summary was set out for the Committee members for noting. Linda Waters (LW) confirmed that on page 14 of the action document the ERP / Equip report would be dealt with in Part II of today's agenda but the report could be forwarded to the Committee after today's meeting should they so wish.

Action: (LW) to forward to the Committee members a copy of the ERP Report although noting this would be 'Official Sensitive' and not for onward distribution.

4. TVP WELLBEING, HS&E ANNUAL REPORT 2018/19 WITH APPENDICES

Norma Brown (NB) and Philip Paling (PP) both presented at today's meeting on the Wellbeing and Health & Safety Management Report for 2018/19, this being the second year of producing these reports. The purpose of the report was to provide CCMT and the Committee with a summary of principal activities and outcomes relating to the promotion and management of Health & Safety within TVP. The report also indicated activity that had been undertaken in respect of wellbeing between 1 April 2018 to 31 March 2019.

The Committee members made reference to the fact that they had yet to receive a report from Dr Steven Chase personally although it was understood from attendees that he would be attending the October JIAC meeting.

(PP) briefly summarised his PowerPoint presentation on Health & Safety – 'Our Future Agenda' to the Committee where copies were passed around. The presentation given was to demonstrate compliance and taking a situational approach to safety and how decisions were made. (RJ) noted the challenge of risk assessment was touched on in the presentation but risk management was in fact to identify risks that had not been assessed and mitigated. The challenge the department needed to think about was how to use risk assessment as well as risk management and the paper produced today only separated the risk assessment.

Mike Day (MD) indicated that organisational 'culture' was what was needed to focus on and asked what the department would do with culture and health and safety in order for the Committee to be reassured that steps were being taken. (PP) confirmed that in order to change culture within the organisation, it could take anywhere up to five years to put in place but the organisation was driving forward on this. Deputy Chief Constable Jason Hogg (JH) felt extremely positive about the culture within Thames Valley Police and had a very good relationship with staff associations. (JH) confirmed that the Federation had recently been in contact with him direct on Health & Safety matters. Gordon Woods (GW) was interested to note that the Federation had gone direct to (JH), rather than through normal reporting channels, but JH stressed that he was more than happy to liaise with them to address and resolve any issues.

(LL) commented that overall, the report was well detailed but felt it was difficult to see what had happened in 2018/19 particularly on page 21. (LL) asked (PP) to ensure that this was covered in the next report. (PP) would take the Chair's comments on board for next year. A lot of hard work had gone into the report and it would have been good to be able to highlight the bids. If this was not carried out and CCMT had undertaken the risks, there would not have a prevention strategy in place even though supported.

(NB) produced a PowerPoint about workplace wellbeing in that it was very important to stress to line managers about wellbeing and making the point that it is about how you feel and connect, not only to be motivated at work but also physically and mentally. (NB) and her team were working with National Blue Light Wellbeing and in May this year they launched a wellbeing framework (known as 'OK'). More work was needed about personal resilience amongst all forces in going forward. There were seven specific areas contained within the plan with 48% of TVP officers spending time worrying about finances so were trying to assist with advice and support staff to maintain or improve their mental wellbeing. (NB) ran through the highlighted sections in green on the slide. There were female officers who drew to ACC Dave Hardcastle's attention their uniform specifically the shirts they had to wear. A lot of female officers were going through the menopause and felt that the type of shirts they had to wear were not adequate and the issue ought to be looked into. Wellbeing also affected a lot of men who also came forward with their concerns. In order to support line managers and senior leaders, the organisation wanted to increase their understanding of their role in creating and improving staff health, safety and wellbeing and Alison Sercombe would be undertaking refresher training. (NB) confirmed that TVP wanted to change the aspects of culture that had a negative impact and if this was to change, then as an organisation they would need to try and drive a behavioural change. (NB) covered key areas of how the organisation could help around issues of leadership and that more emphasis was needed about what could be done although there was also an element of taking personal responsibility by the individual. A very brief survey was carried out and circulated to all areas of the organisation to understand what the 3 priority local wellbeing initiatives were. One of the most popular things requested was for water coolers to be available this is being looked into by CCMT. The staff also brought up in the survey about cleanliness, environmental issues and car parking accessibility. The lack of access to fresh milk for teas and coffees for officers on shift at Loddon Valley had now been dealt with and this was achieved through local Sports and Social Club funding.

(LL) thanked (NB) for her presentation noting a lot of measures had been put in place, which was pleasing to see. (JH) was confident that he could go into each LPA area and talk about wellbeing as a lot of staff were now heavily involved with this as well as Heads of Department. (NB) would think about what plans were required in going forwards with key deliverables for 2019/20 and was keen to structure this e.g. getting water coolers back into the organisation. (JH) confirmed this would be done and also to the recent meeting with the cleaning staff about various issues. There would be a clear action plan and outcomes by next year and (JH) would be working closely with (NB) to achieve this.

(LL) welcomed the new Deputy Chief Constable (JH) to his first JIAC meeting and apologised for not noting this at the start of the meeting.

5. TVP ENVIRONMENTAL ANNUAL REPORT

Neil Wickham (NW) presented the Environmental Annual Report on behalf of Mike Underwood who was unable to attend today's meeting. The report for 2018/19 followed the same format as the previous report and (NW) highlighted some of the key points.

There were no changes to the organisation's commitment and governance as set out on page 52 of the Environmental Management approach or Environmental Management policy. As to the Government's Resources and Waste Strategy 2018, this was the first major Resources Strategy since 2011 and along with new policies and legislation, covered reducing avoidable waste, re-using and recycling waste and promoting resource efficiency. However, the new national policies would not be implemented for several years.

Significant progress had been made towards the 33% carbon reduction target for the entire 10 year period covering both plans since 2010. There had been reductions in consumption of 26% achieved to date. There had been key actions and pieces of work recently undertaken to include a review of energy use across the estate, i.e. Building Management Systems (BMS) which was ongoing work and in progress in order to simplify the systems so that access, control and serviceability were easier to manage. LED lighting was an integrated programme replacing the old fluorescent lighting through the maintenance team and major refurbishment projects with the capital team would deliver significant savings both in the energy and carbon savings and therefore the reduction of facilities staff to constantly keep replacing lamps. There were now Biomass Boilers at Sulhamstead with three new boilers serving the Training Block, White House and Stable Block. The two

existing boilers serving the PSTC building were now connected to Imbert Court following its refurbishment programme and removal of 'all electric' heating and hot water systems that were previously installed.

Facilities were continuing to investigate the options for Electric Vehicle Charging Points and looking at new projects such as Atlantic House in Reading. Meetings had taken place with external service providers as well as other forces exploring the options and pitfalls. With the deregulation of the water industry in 2017, TVP were working with different suppliers and service providers to see how best to procure this service from one supplier. Savings could be achieved through a wholesale discount and streamlining of the administrative and billing services. Seven waterless urinal trials had recently taken place across the Force and if successful and rolled out, could have additional savings of approximately £20k that could be achieved in order to reduce water consumption. Automatic sensor taps and aerated tap placements were now in the organisations standard specification for all new, refurbishments and replacement works.

As to waste management, the graph set out on page 59 of the report showed the improvements made in general waste and recycling over a 10 year period with an overall reduction in waste of nearly 29% and an increase in recycling to 34%. There was also a reduction of confidential waste which was now at 55% with all confidential paper securely shredded and recycled.

On page 61 of the report (NW) noted that Facilities were working with procurement, the catering contractors at Sulhamstead and external service providers to minimise the use of SUP's (Single Use Plastics) which was now a standing item at the Environmental Management Group (EMG) meeting. (NW) confirmed that in relation to communication and engagement processes, Thames View would be carrying an article on Environmental Management across the whole of the Force.

In conclusion, good progress continued to be made, the carbon emission reductions continued to improve as well as improvements and overall reductions in waste, recycling and management of plastic waste.

(RJ) thanked (NW) for his comprehensive report and for talking about money. However, (RJ) struggled to find transport costs and how to address these issues. (NW) confirmed that a meeting had taken place with the Chiltern Transport Consortium but had not received all the figures just yet, but discussions were taking place as to how electric fleet vehicles could be integrated into the organisation. (JH) indicated that insurance premiums were high and telematics had recently been added to all vehicles and this would have a reduction on mileage by reducing the cost of fuel. (JH) was excited about the long-term plan for this in order to give TVP better savings.

(LL) made some observations on the report and confirmed that the organisation had done well in carbon waste management and asked whether a new target was being set for the next five years. (NW) would look into this. (LL) had noticed that the figures set out on page 61 had dropped substantially and asked whether there was a culture change of not printing or would it reduce further. (NW) confirmed that the need to print out documentation would start to reduce. (LL) noted that environmental changes had progressed and thanked (NW) for his presentation.

(NW) left the meeting at 11:30am.

6. EQUALITY, DIVERSITY & INCLUSION ANNUAL REPORT 2018/19

The Committee confirmed they had read through the papers prior to today's meeting. Nita Pankhania (NP) reported on the Equality, Diversity & Inclusion Annual Report for 2018/19 to inform the Committee the achievements from the past 12 months as well as the planned activity for 2018/19 and discussed the key aspects of the report. The challenge of increasing BAME representation across the workforce remained a considerable one and the data given on page 69 set out the performance against the Force Delivery Plan. On 31 March 2019 there were 216 police officers from a BAME background, a representation rate of 5.07%. There were 26 PCSOs from a BAME background with a representation rate of 6.53%. Both of these had increased from March 2018 to March 2019. The figures showed a decrease from 40 special constables to 36 special constables in March 2019 as well as a decrease in police staff. In March 2018 it was reported there was a 5.54% BAME background workforce whilst in March 2019 the percentage decreased to 5.51%. (NP) noted that the figures had not changed significantly and the organisation would be looking at the whole

of the recruitment process to increase these figures. The challenge for (NP) and her team was the College of Policing and staff being flexible when joining.

TVP participated in the 'Police Now' scheme which was based on the 'Teach First' graduate recruitment model which was initiated by the Metropolitan Police Service but was now an independent social enterprise. The organisation had recruited two cohorts and a third due to start training at the summer academy on 22 July 2019. Statistics were set out on page 70 to show the police officer recruitment and the new starter figures and completion of probation figures for the calendar year 2018. (LL) had noticed that the total BAME new starters for 2018 were 23 however, by the time the new starters completed their probation, only 9 had completed the training. (NP) confirmed that this was because 14 new starters had simply dropped out of the process. (JH) confirmed to the Committee that he would take this data set out in section 6.7 away with him and update the Committee thereafter.

(NP) continued to summarise the retention and progression as well as community and recruitment engagement. In relation to reviewing the governance structure, (NP) confirmed that the name of the board was changing to 'Chief Officers Diversity Board' with each CCMT member to sponsor characteristics to lead on strands of work in going forwards and to report back to the Strategic Board.

(LL) noted that there seemed to be a lot of activities being carried out and was concerned that the organisation were spreading itself too widely and to perhaps look at reducing this.

Alison Phillips (AP) noted the report was very comprehensive and asked whether the organisation specifically briefed universities and colleges for young people to engage and come along and be steered towards joining the Force. (NP) confirmed that school and university engagements were being carried out and were trying to broaden their minds speaking about policing and staffing opportunities within the organisation.

(JH) to speak to Dr Steven Chase to attend the October JIAC meeting and would touch on subjects that the Committee wished to raise.

Action: (JH) to look at the statistics set out in section 6.7 on page 70 of the police officer recruitment and new starter figures and update the Committee as to his findings as to why so many BAME police officers starters had dropped out before completion of probation.

Action: (JH) to speak to Dr Steven Chase to attend the October JIAC meeting and would touch on subjects that the Committee wished to raise.

7. ANNUAL REPORT FROM THE CHIEF INTERNAL AUDITOR 2018/19

The Annual Internal Audit report 2018/19 including the Chief Internal Auditor's Annual Internal Audit Opinion. (NS) briefly summarised the requirement and framework set out on page 82 and went through the table which detailed the audit assurance ratings issued over the last five years. Although there was an increase in the number of limited assurance ratings, this showed that there was a positive culture and maturity within TVP and the OPCC in engaging with the audit process and requesting reviews of high risk areas that were likely to require improvements.

The Joint Internal Audit Team followed up management's progress in implementing agreed actions from any issued final audit reports. Any overdue and outstanding actions were reported to the Committee on a quarterly basis. For 2018/19 the number of actions that were reported to the Committee in July 2018 were 21 and throughout the year, there was a steady decrease in the number of overdue actions. By March 2019, the number of overdue and outstanding actions were 14.

- 2017/18: 11 actions overdue
- 2018/19: 3 actions overdue

The performance targets were monitored by the Internal Audit team during 2018/19 and (NS) went through the testing phase and reporting phase as set out on page 90.

Overall, the Joint Internal Audit Team had another successful year building on the excellent PSIAS assessment outcome which was achieved back in 2017. The team continued to receive positive customer feedback and a good level of performance against the team's performance targets had also been achieved. The team would continue assessing and ensuring compliance with the PSIAS and take on board and respond to any feedback from audit customers. (NS) went through the key assurance ratings for the 2018/19 summary highlighting the terminology for the ratings of Substantial, Reasonable, Limited and Minimal.

To gauge customer opinion of the quality and effectiveness of the Joint Internal Audit Team, a questionnaire had been circulated to customers and key stakeholders during May 2019. In a change for 2018/19, the questionnaire was split into two sections, Strategic and Operational. The feedback received was of a 'good level' and overall, a fairly good year for the Force and the OPCC. In addition to the responses, comments were recorded on the questionnaires that were returned. (MD) noted that bullet point four on page 97 reported that one respondent remained unconvinced of the value added by the process against the cost and time to engage and take part. Operational policing was already subject to significant scrutiny via the HMIC Peel Inspections, Service Improvement Reviews, Internal Audits, Complaints, Integrity & Ethics Panel and in view of this saw relatively little additional value provided by the Joint Internal Audit Team. (MD) asked whether people would prefer HMIC to pick this up or that the organisation continue to carry on picking this up. (JH) was keen to meet with (NS) and (AS) to discuss this admin exercise as improvements were required here although noted that TVP commission these audits and there was a need to discuss the planning process. Rob France (RF) agreed with (JH) and would leave the individual departments to deal with this with CCMT to learn of those matters which the Committee see.

(LL) commented on the fourth bullet point on page 97 under the section headed 'Operational'. The report noted that occasional materiality and actual risk to the organisation may need to be considered and factored into the work and reviews. (LL) pointed out that he thought the audit team carried this out already to which (NS) confirmed his team do carry these out and the risks are considered. (NS) confirmed he had visibility and also attended CIPFA Police & Fire Panel meetings. (LL) thanked (NS) for a very comprehensive report provided to the Committee.

The Committee was requested to note and endorse the Annual Report of the Chief Internal Auditor for 2018/19.

The Chair approved the recommendations.

Action: (NS) to liaise with (JH) to arrange an admin exercise to discuss the planning process around improvements in relation to internal audits and HMIC.

8. ANNUAL TREASURY MANAGEMENT OUTTURN REPORT 2018/19

The report provided information on actual treasury activity for the 2018/19 financial year ending 31 March 2019 with quarterly treasury management performance updates presented to the PCC in July and October 2018 and January 2019.

The PCC's debt and investment position was managed by the OPCC Finance team in order to ensure adequate liquidity for revenue and capital activities, security for investments and to manage risks within all treasury management activities. Ian Thompson (IT) went through the PCC's treasury position set out on page 105 for the benefit of the Committee and confirmed the need to make sure sufficient cash was available to meet day-to-day financial commitments but that the OPCC had a positive cash flow and were in a good position.

As to short-term borrowing undertaken during 2018/19, on each occasion borrowing was undertaken to cover a cash shortfall pending the receipt of government grants and/or council tax precept income. The average interest rate was 0.64% which was a good short term way of getting cash when monies were due. There were three occasions when local authorities did not pay their council tax precept income on time and once monies had been received, the authorities paid the OPCC's overdraft interest.

The PCC's longer term cash balances comprised both revenue and capital resources as set out on page 111 of the report. (IT) confirmed that the organisation held a healthy level of cash reserves.

Table 8 Investment Yields set out on page 112 showed that the actual rate of return on investments over the last 12 months (0.87%) had on average outperformed the bespoke TVP benchmark rate (0.77%) by 10 basis points due, in the main, to the fixed term and notice deposits that were placed with Lloyds Banking Group, Santander UK and Dundee City Council. The actual interest receipts for the year of £1.031m was £0.531m higher than the annual budget of £0.500m. This was because the Bank of England base rate rose in August 2018 and a saving of £0.392m from paying employers' contribution to the LGPS as administered by Bucks County Council annually in advance rather than monthly.

(LL) thought the report showed the activity had been managed well. The benchmark yield had been set a long time ago and it was asked whether this had recently been reviewed. IT explained why the benchmark is still relevant

(RJ) noted that a discount was being granted by the pension fund in return for the annual contribution paid in advance but it was also a risk and asked (IT) how the office balanced discount against the risk. (IT) confirmed that it manifests itself at the end of the year and if the fund did not perform then all bodies would have less monies held in the Pension fund. The OPCC contribution to the Pension Fund is revised every 4 years, following a review by a pensions actuary. It is a small risk. (RJ) recommended that IT should legal advice on the implications for TVP of a stock market crash. .

Note: following a short discussion during the lunch break RJ reported that he now understood better how the LGPS works and supported IT's view that an annual upfront payment of the employers contribution represents good value for money.

The Committee was asked to note the Annual Treasury Management Report for 2018/19.

The Chair approved the recommendations.

9. TVP RISK MANAGEMENT & BUSINESS CONTINUITY REPORT 2019/20

(RF) went through the purpose of this report which was to provide a summary of the governance arrangements, risk and business continuity decisions, mitigating actions and outcomes for the 12 months from April 2018 to March 2019 and explained the rationale for the Quarter 4 report being presented in Part II in its entirety.

Mark Horne (MH) then summarised the current strategic risk which were included on the Force's Strategic Risk Register (SRR) as to the current downward trends. Overall, the level of understanding was good although dates relating to SRR needed to be picked up.

This year there had been three occasions when business continuity plans were invoked in response to a significant incident. The first was because of the flood in the basement of High Wycombe Police Station from a burst water pipe that impacted on the electrical supply to the custody suite. A further flood at High Wycombe Police Station caused a secondary pipe failure where both water and electricity supplies were stopped for a number of hours. There was also a loss of water to HQ South, Kidlington for around 3.5 hours which impacted on toilets, access to water and two departments invoking business continuity plans.

(MH) informed the Committee of the ICT Priority 1 and 2 incidents. Of these incidents one involved invoking a Business Continuity Plan, and one P2 ICT incident which did not meet the criteria for a P1 which resulted in a plan being pre-emptively engaged. Having reviewed the P1 and P2 incidents, there were no identified concerns or indicators to suggest either emerging risks, changing risks or significant business continuity concerns.

The Committee thanked (RF) and his team for the update.

10. ANNUAL GOVERNANCE STATEMENT 2018/19

The Joint Annual Governance Statement was published in the annual Statement of Accounts for 2018/19 that both the PCC and Chief Constable produced.

(IT) confirmed that a thorough discussion on the draft Annual Governance Statement had taken place during the previous meeting in March. . Issues were considered and there were none to report. The final Annual Governance Statement has been incorporated in the Statement of Accounts, which had been audited by Ernst & Young who were satisfied with it. (LL) noted that all previous comments made by the Committee had been included in the new version and provided the Committee with an accurate reflection.

(RJ) commented on paragraph c. on para 127 re: 'Equip' (previously known as 'ERP') where he understood how complicated this had been but the phrasing in this paragraph particularly the word 'anticipated' was incorrect and that surely it was the organisation's intention that ERP would work first time. (IT) confirmed that he would review the wording in this paragraph.

In considering the Annual Governance Statement and the effectiveness of current governance arrangements, the Committee were invited to consider three questions set out in 2.1 on page 129 to which all members confirmed their agreement.

(LW) confirmed to the Committee that the custody contract had gone out to tender and a decision made to bring the service back in-house was in effect from 1 April 2019.

The Committee was asked to review the Annual Governance Statement for 2018/19 and endorse the conclusion contained within.

The Chair approved the recommendation.

Action: (IT) to review the wording set out on page 127 of the Annual Governance Statement at section c. in relation to the word 'anticipated' and change if appropriate.

11. OPCC RISK REGISTER

The OPCC Risk Register provided an annual overview of risk management and business continuity management policy and processes adopted by the OPCC together with the most recent quarterly progress update report. The presentational format of the OPCC Risk Register had gone from the old model to the new model which had been adopted by the Force. This document was still work in progress and subject to fine tuning.

(PH) indicated that the colour coding had not been made very clear on the register and wanted the Committee to know that the apparent orange colouring should in fact be yellow. There were six assurances shown as 'reasonable' and one as 'substantial'. It was anticipated that the next review of the Risk Register would incorporate any significant risk identified in relation to the Victims First Hub. In the internal audit report reviewing the governance and control arrangements in place at the Hub, the conclusion was of 'limited assurance'. Furthermore, the OPCC had recently commissioned an internal audit of the financial payment processes and control arrangements for the Hub and for specialist counselling services picked up and the outcomes of both of these audits would be reviewed when the Risk Register is next updated.

As to the OPCC 25 GDPR Compliance risk, this was assessed as 'Substantial Assurance' (i.e. 'Green') and had been intended to be closed as a risk on the OPCC strategic risk register but the OPCC wished to revisit this risk due to the findings at the Victims First Hub.

(LL) thought the report was very readable and consistent and showed clearly the dates of completion. (MD) queried why the apparently weak governance and control arrangements at the Victims First Hub had not been identified and addressed before now. (PH) pointed out that the new service model for Victims First Hub had been created from scratch and went live in April 2018. A lot of work had been done to develop the model and put the service infrastructure in place. The priority had been to deliver this service to victims as from

April 2018 when the previous service arrangements ceased to ensure the PCC was able to continue to discharge his statutory obligations to victims. (PH) confirmed that the OPCC had encountered a few problems with staff handover, recruitment and management issues etc. which had, and still continue, to impact on the service. However, the audit had made clear the governance weaknesses. (PH) felt that he could have been more proactive as to reviewing matters at the Hub as he had been aware of the management problems that had occurred. It was acknowledged that there were still governance deficiencies and weaknesses at the Hub and in hindsight, he should have got to the bottom of this. (MD) thanked (PH) for his honesty but needed (PH) to think about additional wording in the OPCC Risk Register. (GW) asked whether reviewing the risks process was dynamic enough as it seemed a long time since the last risks had been reviewed prior to today's meeting. (PH) confirmed that risk management discussions between OPCC senior managers take place round a table on a quarterly basis where items are picked up and identified. The PCC and Deputy PCC are then made aware during an internal Senior Management Group (SMG) meeting of any issues or risks that have come to light. (GW) asked whether SMG had looked at the OPCC Risk Register since 9 May to which (PH) confirmed that they had been looked at.

Action: (PH) to present an updated OPCC Risk Register at the next Committee meeting.

The Committee were invited to review and note the report as appropriate.

The Chair approved the recommendations.

12. PROGRESS ON DELIVERY OF AGREED ACTIONS IN INTERNAL AUDIT REPORT

Amy Shearn (AS) went through the delivery report and the progress made by managers delivering the agreed actions. There were three priority 1 overdue items and of the priority 2 overdue actions, none were specifically drawn to the attention of the Committee.

(MD) noted that matters were moving in the right direction with the reported numbers decreasing had been reflected in the report.

(LL) confirmed the analysis of the number of overdue actions set out in Appendix 2 was a good overall picture. (AS) commented that on Appendix 3 on page 171 under the section Firearms Licensing (Administration and Management), a new computer system had been introduced since the audit took place.

(NS) confirmed to the Committee that he had access to audit the CTC (Chiltern Transport Consortium) as well as CT (Counter Terrorism).

(IT) updated the Committee as to his meeting with (LW) and (NS) in that there are a lot of outstanding actions that will become due prior to the next Committee meeting and this is likely to mean an increase in overdue actions being reported.

The Committee were requested to note the report.

The Chair approved the recommendations.

13. ERNST & YOUNG POLICE SECTOR AUDIT COMMITTEE BRIEFING

The Police Sector Audit Briefing was dated June 2019 (Quarter 2) and was one of the ways that Ernst & Young supported the organisation in an environment that was constantly changing and evolving. The briefing covered issues which may impact on the organisation and the audits that were undertaken.

The report made a total of 16 recommendations. These recommendations were addressed to different stakeholders depending on the nature of the recommendation and the current fraud structure. Some were addressed to the National Police Chief's Council (NPCC), Co-ordinator for Economic Crime as well as Chief Constables. There were other recommendations solely for the Home Office. Alongside the 16

recommendations, the report highlighted a number of areas of improvement which were specifically addressed to local chief constables. The Committee confirmed they have read the report prepared. Suresh Patel (SP) from Ernst & Young picked up on three items which he wished to discuss with the Committee. NAO Consultation on the Code of Audit Practice where this was the biggest challenge in Value for Money and hopefully the consultation would lead on scope. (SP) wanted it noted that MHCLG (Ministry Housing Communities and Local Government) which was equivalent to the Home Office but for local government had a review of local audits and arrangements and there were concerns about the operating of this. There was also an increase in regulations for auditors. However, this was more for Ernst & Young to deal with.

Ernst & Young had responded to CIPFA's consultation on the Financial Management Code (FM Code). It was Ernst & Young's view that the FM Code would assist officers of local authorities to manage their finances. The FM Code should apply to all local bodies because the principles of sound financial management were relevant for all entities. However, consideration needed to be given as to the reasonableness of whether local authorities had sufficient time to comply with the FM's Code implementation date of 1 April 2020. Additionally, in Ernst & Young's view, there was merit in requiring authorities to include a statement of compliance within their Annual Governance Statement and that consideration should be given as to the nature of the compliance statement because local auditors would have to review this compliance statement for consistency with their knowledge of the entity. The FM Code would be issued in October and effective from 1 April 2020.

Given the findings and recommendations in the HMICFRS Fraud Report, (NS) confirmed that he had completed the audit on Fraud and this would be reported on to the Committee during the October 2019 meeting.

Action: (NS) to bring the completed findings and recommendations from the audit of the HMICFRS Fraud Report to the next meeting in October.

BREAK 12.40PM – 1.00PM

(LL) made further introductions to the new attendees that came into the meeting after the break.

14. ANNUAL REPORT OF THE SIRO

Marion Peulevé (MP) provided a summary of the Annual Report as to the Information Assurance (IA) and Information Governance (IG) activity across Hampshire Constabulary and Thames Valley Police during 2018/19. This was to provide assurance to the Committee that information risks were being managed effectively and (MP) did not propose to go through the report as the Committee had already read through the contents but was happy to take any questions.

As to the Information Sharing Agreement, (MD) asked how comfortable the Force were in sharing information with others, e.g. for GDPR purposes through a third party, and how good were these arrangements. (MP) confirmed that it was a challenge but the Force were aware of the responsibilities to ensure GDPR compliance although there were 300 agreements that were somewhat challenging. (MP) and her team were looking at the risks and would need to identify what third party it was as to what response was dedicated to that as well as the impact on data subjects if there was a breach.

Looking at Subject Access Requests (SAR), (GW) noted that the admin fee had been removed and wanted to know whether there were any trends that stood out as to what members of the public were requesting. This had been quite a challenge for (MP) and her team especially focussing around the media information of GDPR of what could be removed from the Force's systems and what could not. When the public submitted SAR's to the Force they believed all of their individual personal information can be deleted off the system when in fact this was not the case. There had been a lot of enquiries with the Force about this to date.

(LL) referred to the section of protective monitoring set out on page 179 item 15 where an independent security benchmark had been undertaken as part of the National Enabling Programme by Deloitte Consultancy. Initial findings indicated that two forces were above average compared to their peers and that

a maturity and capability assessment was also planned, which would identify areas that needed further development. Geoff King (GK) confirmed that this was indeed an assessment carried out by Deloitte on maturity for this section and that plans were in place locally and nationally and in driving forward would be cost effective. The Committee asked for (GK) to include in the next SIRO report to JIAC the progress that has been made to date.

It was noted that in June 2017, IA led a cyber response exercise to assess the capability of Joint ICT to respond to a cyber-attack. The exercise had been developed in partnership with the National Police Information Risk Management Team from the Home Office and consisted of a simulated ransomware infection on a Force laptop. The simulated ransomware that had attached had been further developed and a further exercise was being planned for November 2019 to follow this up.

As agreed by the National Police Chiefs Council, TVP and HC utilised the College of Policing GDPR training package. The package was unfortunately delivered considerably later than intended. However, as at June 2019, 86% had been completed by TVP and 90% had been completed by HC. 90% was where TVP needed to be and this was monitored through the Joint Information Management Board every quarter but this was not a resource problem.

Set out in Appendix B on page 187 was a Summary of reported security incidents for 2018/19. The loss of theft of technology assets were 142 but this was not the actual loss or misplacement and the Committee asked whether the words 'loss' and 'theft' could be separated and distinguished in the summary for the next annual SIRO Report. The Committee also noted that 'Unauthorised Disclosure' was also extremely high for TVP and HC. (MP) confirmed that this was when TVP had provided information to the CPS and they then query whether it would be appropriate to disclose this information although as (MP) pointed out, it would have been important to disclose it.

Action: (GK) / (AC) to include in the next SIRO report the progress made to date of any areas identified that needed further development in relation to Protective Monitoring.

Action: (GK) / (AC) to separate and distinguish between the words 'Loss' and 'Theft' as set out on page 187 of the Summary of reported security incidents in the next annual SIRO report.

15. EXTERNAL ANNUAL AUDIT 2019/20

Ernst & Young sent their 'Fee Letter' to the Chief Constable and PCC on 26 April 2019 in relation to the annual audit for 2019/20. The letter sets out their summary of fees and the scale fee that would be billed in 2019/20, which was £14,440. The fee reflected the risk-based approach to audit planning as set out in the National Audit Office's Code of Audit Practice for the audit of local public bodies. The audit fee covered the audit of the financial statements, Value for Money conclusion and the whole of Government accounts and was purely for the Committee to note at today's meeting. (IT) noted that both the PCC and the Chief Constable had received the same letter but that only one had been provided in the bundle as they were identical, apart from the fee levels.

16. FINAL ACCOUNTS 2018/19 AND STATEMENT OF ACCOUNTS 2018/19

In accordance with the Police Reform and Social Responsibility Act 2011 ('the Act') the PCC for Thames Valley and the Chief Constable were both required to produce separate Statement of Accounts. The PCC was also required to produce Group Accounts.

- PCC Group Statement of Accounts 2018/19
- Chief Constable Statement of Accounts 2018/19

The PCC's Statement of Accounts included the Group financial statements for the PCC and Chief Constable and the PCC's Annual Governance Statement (AGS), and the single entity financial statements for the PCC. The Group Balance Sheet showed that the Group had a net liability of £4.444 billion due to the liabilities

associated with the unfunded police officer pension scheme (£4.354 billion) and the funded local government scheme for police staff (£368m). Excluding the pension liabilities, the Group had net assets of £278m.

(IT) summarised the Revenue account which shows a high level summary of the outturn position for 2018/19 which was clearly set out on page 22 in Table 1. In total, the revenue budget was overspent by £0.307m or 1% of the approved net revenue budget. This figure was made up of underspends of £0.447m on the PCC Controlled expenditure and £0.431m overspend on the operational budget with an overspend on financing items of £0.323m.

There was a typo error on page 25 of the Report for Decision at section 1.22 and (IT) confirmed that he would amend this figure from £25.687m to £5.687m.

(IT) continued to summarise the General Revenue Balances, Earmarked Revenue Balances and Capital Balances set out in the decision paper. (IT) also confirmed that the organisation was yet to receive the request from Ernst & Young to produce the 2018/19 letters of representation but would share these with the Committee members hopefully early next week.

All local authorities in England and Wales including police and fire authorities was due to the recent Supreme Court ruling in respect of McCloud. (IT) noted that every public sector would be affected because of this judgment. On Thursday 27 June, the Supreme Court upheld a ruling last year that changes made by the government to the pensions of judges and firefighters were unlawful on the grounds of age discrimination. An updated police pension IAS19 report from GAD was due to be received on 31 July 2019 and would include a new past service cost of £183.52m which exceeded all materiality thresholds. The report from Barnett Waddingham in respect of IAS19 pension costs for police staff would identify an increase of £9.2m.

(IT) then explained to the Committee the consultation survey process in relation to the increase in council precept and how this percentage was recorded. The Police Pension Scheme (PPS) set out on page 72 of the PCC Group Statement of Accounts 2018/19 needed to be redrafted as well as the section in the Chief Constable's Statement of Accounts as to the State Earnings Related Pension Scheme (SERPS) and (IT) confirmed that he would redraft the first paragraph.

Overall, the Committee were happy with the quality of the systems and processes in place for preparing the accounts on an accurate and timely basis as well as the confirmation of 'overspend' being explained thoroughly to them. Capital expenditure was underspent and explanations were given to the Committee as this always seemed to slip but the organisation had bought in an 'active' budget to help mitigate this annual occurrence. A lot of work was being undertaken to ensure that the organisation did not over commit themselves until delivery and the Committee were comfortable that progress was being made.

Action: (IT) to amend the figure set out in Capital Accounts on page 25 from £25.687m to £5.687m.

Action: (IT) to ensure the letters of representation are sent out to JIAC once they are received.

Action: (IT) to redraft the first paragraph set out on page 72 of the PCC Group Statement of Accounts as well as the Chief Constable's paragraph in their Statement of Accounts in relation to SERPS.

The Committee was asked to consider and note the two separate Statement of Accounts for the PCC and Group and Chief Constable. To consider and note the management letters sent to the External Auditor and to note the receipt of the external auditor's unqualified audit opinion on the accounts.

The Chair approved the recommendations.

17. ERNST & YOUNG AUDIT RESULTS REPORT 2018/19

Suresh Patel (SP) presented the Ernst & Young Results Report for 2018/19 and confirmed they had completed their audits for the Police and Crime Commissioner for Thames Valley and the Chief Constable

for the year ended 31 March 2019. Ernst & Young expect to issue an unqualified audit opinion on the financial statements before 31 July 2019. TVP were in a good position and the Committee took assurance from this. There were no issues arising and all looked positive.

Ernst & Young had completed their review and summarised the 'Value for Money' findings. They considered the organisations arrangements to take informed decisions; deploy resources in a sustainable matter, work with partners and other third parties. Ernst & Young identified a significant risk in respect of the new ERP system. However, they carried out a detailed review across the three organisations involved in the financial and governance arrangements (Surrey, Sussex and TVP) in order to manage the project and were considering their findings and the implications on the value for money conclusion. (SP) confirmed that arrangements around governance were in place.

The significant risks update was presented by Adrian Balmer (AB) from Ernst & Young as set out on page 51 of the report. A large proportion of Ernst & Young's time had been taken up with the McCloud pension liability valuation which as previously indicated was a national issue. Other areas identified in the audit that had not been classified as significant risks were still important when considering the risks of material misstatement to the financial statements and disclosures.

Ernst & Young liaised with the auditors of Buckinghamshire County Council Pension Fund to obtain assurances over the information supplied to the actuary in relation to TVP. As at the meeting date (12 July), they were still awaiting a response to their audit enquiries but would liaise with (IT) and (LW). Ernst & Young were still concluding their work on the pension liability and actuarial assumptions and gave an update to the Committee on the proposed opinion. (AB) noted there were no material impacts to speak of and they anticipated that they would have this work concluded by next week.

To conclude, Ernst & Young were expecting to issue an unqualified audit opinion on the PCC (Group) and CC financial statements subject to satisfactory conclusion of the remaining testing. Ernst & Young were also finalising consideration of the work completed to satisfy the Value for Money Conclusion. This included an internal consultation process on their proposed conclusion from the work detailed at Section 5 and at this stage were unable to share the final opinion wording with the Committee until that consultation was completed.

(LL) thanked Ernst & Young for their report and congratulated the efforts that (IT), (LW) and their teams had achieved before 12 July 2019. (LL) asked what pressures could be placed on Bucks County Council to provide the letter as soon as possible. (SP) confirmed that Ernst & Young should receive the letter by next week but that the accounts could not be closed off until they were in possession of the letter.

The Hampshire JIAC Observer, Melvyn Neate left the meeting at 2.05pm.

Date of next meeting 4 October 2019 at 10.30am the Conference Hall, TVP Headquarters South

JOINT INDEPENDENT AUDIT COMMITTEE Matters and Actions Arising from 12 July 2019 Meeting

Matters Arising from Minutes of 12 July 2019	Lead	Action	Update / Action complete
Minute 113 (from Minutes of 15 March 2019)	Linda Waters	(LW) to forward to the Committee a copy of the Grant Thornton Report on the Equip Project	(LW) forwarding to (CR) the Report as requested during the meeting on 12 July for forwarding on to the Committee. Noting that the document was marked 'Official Sensitive' and not for onward distribution ACTION COMPLETE
Minute 6 – Equality, Diversity & Inclusion	DCC Jason Hogg	(JH) to look at the statistics set out in the table on page 70, for section 6.7 of the police officer recruitment and new starter figures and update the Committee as to his findings as to why so many BAME police officers starters had dropped out before completion of probation.	STILL OUTSTANDING AND CHASED
Minute 7 – Annual Report from the Chief Internal Auditor 2018/19	Neil Shovell	(NS) to liaise with (JH) to arrange an admin exercise to discuss the planning process around improvements in relation to internal audits and HMIC.	A meeting has now taken place between (JH) (NS) and (AS) on 19 August 2019 at 10am in the DCC's office. ACTION COMPLETE
Minute 8 Annual Treasury Management Outturn Report 2018/19	Ian Thompson	(IT), (LW) and (RJ) to discuss Pension fund and seeking advice on risks	(IT), (LW) and (RJ) discussed this point during the break and matters were clarified and (RJ) received reassurance from this. ACTION COMPLETE
Minute 10 Annual Governance Statement 2018/19	Ian Thompson	(IT) to check the wording on page 127 of the Annual Governance Statement set out in section c. in relation to the word 'anticipated' and change this word as appropriate.	(IT) confirmed that Annual Governance Statement has now been amended ACTION COMPLETE
Minute 11 OPCC Risk Register	Paul Hammond	The OPCC recently commissioned a financial process of counselling services picked up by the audit team and would update the Committee at the next meeting on 5 October with an updated OPCC Risk Register and to build back into the Risk Register any questions that had been removed.	PH would provide an update for the 5 October JIAC meeting. ACTION COMPLETE
Minute 13 Ernst & Young Police Sector Audit Committee Briefing	Neil Shovell	(NS) to bring the completed findings and recommendations from the audit of the HMICFRS Fraud Report to the Committee meeting in October 2019.	(NS) finalised the Fraud Investigation and Response audit report and this will be presented as part of the Internal Audit Plan Progress report at the October JIAC meeting. ACTION COMPLETE

Minute 14 Annual Report of the SIRO	Geoff King / Amanda Cooper	(LL) referred to the section of protective monitoring set out on page 179 item 15 of the Annual SIRO Report where an independent security benchmark had been undertaken as part of the National Enabling Programme by Deloitte's Consultancy. Initial findings indicated that two forces were above average compared to their peers and that a maturity and capability assessment was also planned which would identify areas that needed further development. The Committee asked for (GK)/(AC) to include in the next Annual SIRO Report to JIAC the progress that has been made to date.	(AC) confirmed on 16/08/19 that work is ongoing with ICT and the Force Security Manager to assess the most effective way to achieve this and to accommodate this in the 2020 report. ACTION COMPLETE
Minute 14 Annual Report of the SIRO	Geoff King / Amanda Cooper	(GK) / (AC) to separate and distinguish the wording of 'Loss' and 'Theft' and their meanings as set out on page 187 of the Summary of reported security incidents in the next annual SIRO report.	(AC) confirmed on 16/08/19 that work is ongoing with ICT and the Force Security Manager to assess the most effective way to achieve this and to accommodate this in the 2020 report. ACTION COMPLETE
Minute 16 Final Accounts 2018/19 and Statement of Accounts 2018/19	Ian Thompson	(IT) to amend the figure set out in Capital Accounts on page 25 from £25,687m to £5,687m. (IT) to ensure that the Committee receives the letters of representation once they are received. (IT) to amend the date from 31 March 2019 to 31 July 2019 as set out in section 1.33 on page 28 of the Decision Report. (IT) to redraft the first paragraph set out on page 72 of the PCC Group Statement of Accounts as well as the Chief Constable's paragraph in their Statement of Accounts in relation to SERPS.	(IT) confirmed that all the amendments to the Final Accounts 2018/19 have now been completed. ACTION COMPLETE

JIAC Summary

In accordance with the Operating Principles of the Committee agreed at its first meeting held on 27 March 2013, the Committee has the following responsibilities in respect of business continuity:

- Consider and comment upon strategic risk management and business continuity management processes, and
- Receive and consider assurances that business continuity and organisational risks are being managed effectively and that published goals and objectives will be achieved efficiently and economically, making recommendations as necessary

The attached report provides an annual overview of risk management and business continuity management policy and processes adopted by Thames Valley Police together with the most recent quarterly progress report covering such issues as training, learning from business continuity incidents and training exercises.

Recommendation:	
The Committee is invited to review and note the report as appropriate.	
Chairman of the Joint Independent Audit Committee	
I hereby approve the recommendation above.	
Signature	Date

Risk Management Introduction

Effective risk management is one of the foundations of good governance. A sound understanding of risks and their management is essential if Thames Valley Police is to achieve its objectives, use resources effectively, and identify and exploit new business opportunities. Consequently, in common with all significant public and private sector bodies, the Force has an established framework for ensuring that areas of risk are identified and managed appropriately across its activities.

This framework is derived from the best practice set out in ISO31000: 2018 Principles and Guidelines and applied to the local context. This is the most recent guidance which sets out the principles, framework, processes and activities for the effective management of risk.

A revised risk and business continuity strategy was approved by Force Risk Management Group (FRMG) in October 2018. This provides guidance in the form of:

- Risk Management Strategy
- Risk Management Policy
- Risk Register Guide with an alternative 1 page guide available for quick reference
- Risk Management Communications Strategy
- Reminder of the National Decision Model and reference to the Authorised Professional Practice (APP) Risk Principles

Risk management forms part of the Deputy Chief Constable's portfolio.

Ongoing scanning by the Strategic Governance Unit (SGU), including reviewing departmental and operational risk registers, ensures the identification of strategic risks which are then assessed and scored with relevant business leads. The product of this process, including recommended actions, is presented to the FRMG which considers and makes corporate decisions in relation to those risks and recommendations.

This Report further provides the information necessary for the Joint Independent Audit Committee to fulfil their function effectively. Members are also welcome to review both the force and local risk registers, or specific risk entries, by arrangement with the Strategic Governance team, who will arrange access to the live documents at force headquarters.

Risk Heat Map

This map identifies the current strategic risks, and maps them in terms of priority based on current risk scores.

		Impact			
		1 Minimum	2 Moderate	3 Major	4 Critical
Likelihood	4 Probable				SR 81 ESMCP Finance
	3 Likely		SR74 Recruitment & Retention SR65 Gazetteers SR77 RUI SR 56 Livelink	SR69 Finance	
	2 Possible		SR75 CMP Delay / SR 76 CMP fail SR78 ERP Delay SR79 ERP Fail	SR80 ERP Contract	SR 82 ESMCP Technical
	1 Unlikely		SR83 ESMCP Delay		

Strategic Risk Summary

This report contains statistical and narrative updates to cover the period from 1 July to 31 August, as reported to CCMT on 18 September 2019. The risk summaries have been updated to reflect the CCMT decisions made at that meeting.

The table below shows the direction of travel of each risk score and the current risk management status as agreed by the FRMG. A more detailed description of the risk, including rationale for any change in risk level, is then provided in the risk summaries which follow.

Scoring is based on the 4x4 matrix, and the direction of travel and the risk scores from the last period are included to provide a clear indication of the magnitude and direction of any change.

All risks are reviewed and re-scored for each report with input from the risk owners, or risk leads where this responsibility has been delegated, and the SGU risk lead. In future this scoring will be additionally supported by risk task and finish groups where appropriate.

The summary for each risk included in this document focuses on new mitigating actions and activities and agreed new future actions.

All supporting documents (for example, Programme Board risk registers and additional papers) can be found in [the August supporting documents](#) folders.

Current Strategic risk update

Risk Description	Previous Risk Score (IxL)	Current risk score	Trend	Risk Lead	Current Risk Action
<u>SR 81 – ESMCP (Emergency Services Mobile Communications Programme) Finance</u> Significant delays to the Home Office Emergency Services Mobile Communications Programme result in financial exposure to the region.		16* (4x4)		ACC Hardcastle	TREAT
<u>SR 82 - ESMCP Technical</u> The Emergency Services Network (ESN) Programme delivery is complex and a number of key required solutions are not yet in place (e.g. ground-to-air; details of in-car devices).		8* (4x2)		ACC Hardcastle	TREAT
<u>SR 69 - Funding</u> Funding for 2020/21 may be insufficient to allow us to continue delivering all existing services to the same level of performance and may not accommodate additional demand whether through increasing numbers, complexity or scope.	8 (2.3x3.5)	8 (2.3x3.5)	↔	ACO Waters	TREAT
<u>SR74 - Recruitment and retention</u> The Force is below establishment, as a result of recruitment and retention issues, whilst demand and the complexity of policing has increased.	9 (3x3)	6 (2x3)	↓	ACO Chase	TREAT
<u>SR 77 RUI</u> Impact of release under investigation (RUI) Investigation drift due to RUI resulting in a failure to get cases into court and obtain positive Criminal Justice (CJ) outcomes.	6 (2x3)	6 (2x3)	↔	ACC De Meyer	TREAT

SR65 Gazetteers Out of date mapping is being used by the organisation, which could lead to a number of negative consequences: risk to public safety; risk to officer safety; and potential reputational damage.	6 (2x3)	6 (2x3)	↔	ACC Hardcastle	TOLERATE
SR 83 ESMCP Over-run Financial & strategic ESN risk due to over-run and lack of programme information.		6 (3x2)		ACC Hardcastle	TREAT
SR 56 Livelink Livelink is required to remain functional until Jan 2020, increasing the likelihood of operational issues.	5 (1.6 x 3)	5 (1.6 x 3)	↔	ACO Cooper	TREAT
SR 80 - ERP Contractual Failure to agree a re-plan between SSTVP (Surrey Sussex, TVP) and our commercial partner, KPMG.	7.2 (2.4x3)	4.6 (2.3x2)	↓	DCC Hogg	TREAT
SR 79 ERP Fail The ERP System fails shortly after deployment or is deemed too unstable to be fit for purpose.	4.4 (2.2 x 2)	4.4 (2.2 x 2)	↔	DCC Hogg	TREAT
SR 76 CMP Failure The CMP System fails shortly after deployment or is deemed too unstable to be fit for purpose.	6 (2x3)	4 (2x2)	↓	ACC Hardcastle	TREAT
SR 78 - ERP Delay Equip / ERP being delayed beyond <u>June 2020</u> .	7.2 (2.4x3)	4 (2x2)	↓	DCC Hogg	TREAT
SR 75 CMP Delay If there is delay to the delivery of the Contact Management Programme (CMP), then there are a number of on-going impacts operationally and financially, and reputational damage to the Force.	5 (2x2.5)	4 (2x2)	↓	ACC Hardcastle	TREAT

Scores marked * are from the ESMCP national programme, based on a 4x4 matrix.

Risks are reported below by issue. Risk summaries include an assurance level, using the following definitions:

Substantial	The governance, risk management and control arrangements are strong, although some minor action may be required to improve efficiency or effectiveness.
Reasonable	The governance, risk management and control arrangements are good, although some action is required to improve efficiency or effectiveness.
Limited	The governance, risk management and control arrangements are limited and action is required to improve efficiency or effectiveness.
Minimal	The governance, risk management and control arrangements are weak and significant action is required to improve efficiency or effectiveness.

The levels of assurance provided are based on the risk summary and input from the risk owner, the additional documents supplied which outline the more detailed activities, and benchmarking where this is available. This also includes how effective mitigating actions have been in the past, and confidence around the potential effectiveness of future actions.

Managing deadlines

Projected completion and target dates are recorded based on the following:

	Action completed
	Action on target
	Deadline missed

SR 81 – ESMCP Finance

Risk summary: Significant delays to the Home Office Emergency Services Mobile Communications Programme (ESMCP) result in financial exposure to the region.

Consequences: Financial exposure to the region through having to renew Airwave licences; extend use of the project team, and manage diminishing resources of radios.

Risk Owner: ACC Hardcastle

Reviewed with risk owner: 18/06/2019

Next Review Date: 30/09/2019

Context: As a result of the recently announced additional delay to the national ESN programme, the South East Regional Integrated Policing (SERIP) board requested input from the affected forces to create a regional risk register for the project. Delays to the project will create additional financial exposure to the region through having to renew Airwave licences; extend use of the project team and manage diminishing resources of radios. The additional impacts on TVP have been identified and reported as part of a paper to JIAC. TVP are recruiting a new SRO for the project.

This risk is currently being **TREATED** at a regional level.

Level of Assurance: Limited. There are established national budgeting and monitoring processes in place within clear timescales. However, the project risks identify that the complexity of the project has created governance issues and impacted on national decision-making. Whilst TVP has a Business Change lead in place and established budgets and monitoring, this is a Home Office programme and TVP's ability to impact on national outcomes is necessarily limited.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
Currently awaiting official programme re-plan which will give greater clarity on delays. Project team involved with national planning work to minimise transition deadline. Liaison at regional level with other emergency services to ensure consistency of planning. Early pressure from PCCs and Chief Officers to identify and minimise financial exposure. Locally, the Programme Team are providing re-profiled financial data to Chief Finance Officers (CFOs) and managing programme team vacancies to minimise expenditure.	ACC Hardcastle	30/09/2019	Greater financial transparency from the central Home Office Programme Team. Sustained pressure on the Home Office to underwrite national police financial exposure through successful supplementary estimate to Her Majesty's Treasury (HMT).	ACC Hardcastle	30/09/2019

SR 82 - ESMCP Technical

Risk summary: ESN Programme delivery is complex and a number of key required solutions are not yet in place (e.g., details of in-car devices).

Consequences: Solution is unfit for purpose.

Risk Owner: ACC Hardcastle

Reviewed with risk owner: 18/06/2019

Next Review Date: 30/09/2019

Context: The size and complexity of the programme has resulted in further work being required to deliver fit for purpose and cost-effective technical solutions.

This risk is currently being **TREATED** at a regional level.

Level of Assurance: Limited. Whilst TVP has a Business Change lead in place and established budgets and monitoring, this is a Home Office programme and TVP's ability to impact on national outcomes is necessarily limited.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<p>Clear separation of operational and service readiness and extension of testing window.</p> <p>Chief Constables' Reference Group led by CC Kier Pritchard has commissioned a Local Partnerships Gateway review and action plan.</p> <p>The South East Project Team has 2 working groups: devices and service usability.</p> <p>As a result of a Home Office Invitation to Tender for Air to Ground and Vehicle device, the contract has now been awarded to Cobham, which helps reduce this risk (21/08/2019).</p> <p>Programme Team involvement in the operation evaluation process.</p>	Paul Feazey for TVP	30/09/2019	<p>Agreement of national service criteria</p> <p>Additional governance levels / meetings for Senior Regional Officers (SROs) to exchange information and agree ways forward.</p>	Paul Feazey for TVP	30/09/2019

SR 83 ESMCP Over-run

Risk summary: Financial & strategic ESN risk due to over-run and lack of programme information

Consequences: Delay genuine business transformation.

Risk Owner: ACC Hardcastle

Reviewed with risk owner: 18/06/2019

Next Review Date: 30/09/2019

Context: Additional risk is created by a lack of consistency of governance and planning across all regions, which has contributed to delays and the associated costs linked to the programme.

This risk is currently being **TREATED** at a regional level.

Level of Assurance: Limited. There are established national budgeting and monitoring processes in place within clear timescales. However, the project risks identify that the complexity of the project has created governance issues and impacted on decision-making. Whilst TVP has a Business Change lead in place and established budgets and monitoring, this is a Home Office programme and TVP's ability to impact on national outcomes is necessarily limited.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
SERIP is assessing regional ambition for CCs and PCCs. Working actively with major regional and national programmes to ensure consistency of planning. Enhanced governance at regional DCC level will allow for better prioritised and sequenced change. Regional efforts accelerating about potential alignment of 2 x bilateral mobile programmes (dual devices will be necessary at least in the short term).	ACC Hardcastle	30/08/2019	Work during the delay to look at business change and benefit realisation.	ACC Hardcastle	30/08/2019

SR 69 - Finance

Risk summary: Funding for 20/21 may be inadequate to allow us to continue delivering all existing services to the same level of performance and may not accommodate additional demand whether through increasing numbers, complexity or scope. The savings required to mitigate any funding shortfalls may impact on service level provision.

Consequences: The service cuts avoided as a result of a positive settlement in 2019/20 may have to be implemented in 2020/21, potentially with further savings cuts, with an impact on public facing services and the resultant public impact and reputational issues.

Risk Owner: ACO Waters (Head of Finance)

Reviewed with risk owner: 21/08/19


Next Review Date: 30/09/19

Context: The positive settlement for 19/20 has alleviated the immediate financial risk, but TVP needs to remain focused on providing public services in the long term which is difficult with the high degree of uncertainty around future funding levels.

Until a longer term Government funding strategy is introduced it is likely that TVP medium term financial planning will remain challenging.

This risk is currently being **TREATED** through the budgeting processes in place.

Level of Assurance: Reasonable. There are well established budgeting and monitoring processes in place within clear timescales. The force has a clear medium term financial plan (MTFP) for both capital and revenue expenditure and there is an annual process of external audit in relation to the financial processes.

Risk Score Trend:  As might be expected, there is no significant change in the risk over the last period. Work is ongoing within the budgeting process and the E&E programme to mitigate the risk in the long term.

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register, which references Level 1 finance papers which include budgets and financial plans. It can be found here: [SR 69 Finance](#).

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<p>The current financial projections for 2019/20 which includes future costs and budgeted income / expenditure are reported to the January 2019 PCC Level 1 meeting. This report concludes the budget setting process for 2019/20.</p> <p>This document will form the basis for the 20/21 planning cycle, commencing July 2019 and running during the year as new information becomes available, finishing January 2020.</p>	ACO Waters	12/01/2020	<p>The July CCMT received an Annual Budget & Medium Term Financial Plan – Update</p> <p>A number of factors are recognised as potentially impacting on the 20/21 budget and will be factored into the annual planning cycle as far as possible:</p> <ul style="list-style-type: none"> • The short-term horizon of future central economic decisions and the impact this has on TVP ability to plan • The current political uncertainties • Changes in the PCC roles and possible changes in TVP priorities • Future changes around partnership funding and the impact on the TVP Comprehensive Spending Review and Funding Formula Review. <p>These areas will be analysed throughout the year and feed into the planning cycle.</p>	ACO Waters	08/01/2020
The Effectiveness and Efficiency programme is used to identify potential savings, whilst minimising the impact on current services.	C/Supt France	31/03/2021	Monitoring the 2019/20 budget during the year will inform the future years' budget setting.	ACO Waters	1/07/2020

SR 74 - Recruitment and Retention

Risk summary: If the Force remains below establishment, whilst demand and the complexity of policing increase, TVP will be unable to meet existing and future demands.

Consequences:

- Impact on public facing services with potential risks to public safety, as well as reputational issues.
- Inadequate staffing numbers across both specialist and general roles, which impacts on our abilities to meet targets in the short-term and our longer term force resilience.
- Negative impacts on staffing morale as a result of work patterns and increased demand on existing staff.
- An imbalance in recruitment may cause further risks to be considered around training and mentoring capacity, which will need to be monitored.

Risk Owner: ACO Chase

Reviewed with risk owner: 23/08/2019

Next Review Date: 30/09/2019

Context: Officer numbers continue to grow, with 3830.88 in post at 31 August 2019. The police officer establishment for 2019/20 is 3854.60. The predicted return to establishment position remains at September 2019.

Police Staff actuals on 31 August was 2618.08 with a revised establishment of 2879.19. Much of this gap is currently managed through the use of temporary staff and contractors.

The Programme Board continues to manage the risk through bi-monthly meetings, currently supported by the Head of Change pending the recruitment of a programme manager. Programme Board activity is summarised in the risk table below. The Programme Board covers 3 strands of work:

- Retention
- Contact Management recruitment and retention


- Initial entry routes

A Retention Project Board has been set up and a new Business Change Programme Manager appointed. The Project Board has started to identify a strategy to improve retention, based on input from the Strategic Governance Unit (SGU) and area experts. An initial Risks, Actions, Assurances, Issues, Dependencies (RAAID) log has been completed, and risks and issues identified.

The current mitigation actions have shown some positive impact on recruitment, although this has placed additional demands on training and mentoring resources which requires further action. Having initially addressed the immediate recruitment issues the focus is now on developing an effective retention plan.

This risk is currently being **TREATED** through the Programme Board.

Level of Assurance: Reasonable. There are plans in place through the Programme Board, and initial successes in addressing the recruitment risk. There are targets in place for recruitment. Work has now begun on identifying mitigating actions for reducing the retention part of the risk. The Programme Board has an up to date set of programme risks and issues, which is reviewed at each Board meeting. A number of actions are taking longer than expected to complete, and this requires monitoring.

Risk Score Trend:  There is a continued downward trend as a result of the recruitment work, which has reduced the impact of the recruitment aspect of the risk.

The table below summarises the active mitigating actions and future planned actions, taken from the risk register, which can be found here: [SR 74 Recruitment and Retention](#).

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
21/09/19 A new Workforce Board has replaced the current Recruitment and Retention Programme Board and the Wellbeing, Health, Safety and Environment Board. The first meeting took place on 19 September.	ACO Chase	Ongoing			
22/05/19 CCMT have approved additional resources for the People Directorate to facilitate the increased levels of recruitment and training required to meet our establishment targets. The budget provision extends to March 2021 and will be reviewed in July 2020. Thematic analysis of management issues, based on exit questionnaire data has been delivered and will feed into the retention plan. This will feed into discussions at the Retention Think Tank. A working group is looking at the Exit questionnaire and the exit process for retirees – this work is ongoing. Management of the risk has been transferred to a Programme Board. The Programme Board Risk Register can be found here .	Troy Daniels / ACO Chase	21/07/2020	Take positive action to minimise future Officer losses.	Supt Kath Lowe	28/08/2019

The candidates' microsite - www.tvpcareers.co.uk went live on 6 August 2019.	Caroline Cookson / Corporate Comms	06/08/2019	Undertake further studies into why we are not attracting potential recruits onto training courses. This might include admission standards, perception of career packages etc.	Alison Whitehouse / Caroline Cookson	31/08/2019
CCMT have agreed to 3 x additional PC courses and 1 x additional PCSO courses. Additional resources and accommodation are currently being considered to achieve this.	Alison Whitehouse	31/03/2019	Make use of the opportunities that will arise from e.g. CMP / Op Model Phase 2 / E&E to reduce demand, and make better use of resources.	A/C/Supt Gavin Wong	21/08/2019
Further work on exit interviews is planned to reflect Contact Management's 'appreciative enquiry' sessions with existing staff rather than waiting until exit to improve the quality of outcomes. People Directorate have put in a bid for the funding for this through the annual planning cycle.	Kate Saunderson	04/09/2019	Use evidence-based predictive modelling to quantify future demand on the Force.	Ed Herridge	21/08/2019
A Retention Project Board has been established and the first meeting has identified retention specific risks. The Retention Board log can be found here .	Troy Daniels	01/12/2019	The project will address: <ul style="list-style-type: none"> • Line management • Work environment • Terms & conditions • Staff career pathways 	TBC	TBC

SR 65 – Gazetteers

Risk summary: There are a number of out of date mapping systems (e.g. Atlas Ops, AutoRoute, MapPoint) being used by parts of the organisation.

Consequences:

- Risk to public safety.
- Officers/staff being ineffectively deployed, resulting in delayed responses.
- Inefficiencies in crime recording, potentially resulting in failed cases.
- Incorrect management information being produced to inform operational decision making, resulting in a range of negative impacts on public safety and confidence.
- Incorrect data being published externally.
- Reputational damage.

Risk Owner: ACC Hardcastle


Risk lead: Mick Buckle

Reviewed with risk owner / risk leads: 21/08/2019

Next Review Date: 30/09/2019

Context: Many of the actions needed to mitigate this risk can only be delivered within the ESRI GIS mapping/ CMP project, which will allow us to both end the use of a number of such systems and accurately define any future systems which will need further mitigating actions to reduce the risk. As there are a range of interdependencies and complexities being managed within the larger project, future decisions can only be made in the context of a successful ESRI/ CMP launch. Therefore this risk is currently **TOLERATED**.

Level of Assurance: Limited. Due to the interdependencies identified with ESRI/CMP there is little additional mitigating action which can be put in place at this time. Clarity is needed on the likely residual risk following the implementation of CMP and further actions identified if necessary.

Risk Score Trend:  There are no significant changes to the score of this risk and it remains TOLERATED. As there are few mitigating actions which can impact on the score, we would not expect to see significant further score changes until the implementation of ESRI.

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register, which can be found here: [SR 65 Gazetteers](#)

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
The implementation of ESRI components within CMP.	ACC Hardcastle	21/11/2019	Ongoing monitoring of effectiveness of systems currently employed to ensure that risks are not increasing for individual departments due to individual system issues.	Mark Horne	21/11/2019

SR 77 – Release Under Investigation (RUI)

Risk summary: Investigation drift due to RUI resulting in a failure to get cases into court and obtain positive Criminal Justice outcomes

Consequences:

- Potential impacts on public safety; especially for vulnerable victims, particularly for high harm offences.
- Impact on public confidence in the work of CJ and the judicial system as a whole.
- HMCTS are concerned that if courts are reduced in line with current numbers, and an increase in cases then occurs, HMCTS will not then have the court space required, and timeframes from date of Charge to Trial will increase, having a detrimental impact for Victims and Witnesses.
- HMCTS report an impact on court cases in relation to defendant's failing to appear and an associated increase in cracked and ineffective trials.
- Our local judiciary are concerned that the use of RUI is undermining their ability to protect victims and witnesses by way of remand or bail conditions.

Risk Owner: ACC De Meyer

Risk Lead: Karin Williams-Cuss


Reviewed with risk owner / risk leads: 21/08/19

Next Review Date: 30/09/19

Context: Whilst the risks around court slots remain, it has been recognised that the future risks should focus on the impacts of RUI on investigations. Operation Endeavour is the Force response to twelve issues relating to investigations, outlined in the risk summary below. The Endeavour project's focus is on current issues around investigation, and to improve existing practice. Whilst this will generate some mitigating actions, it is not in place to deliver a comprehensive set of actions against strategic risks of which CJ retains risk ownership.

This risk therefore remains as being **TREATED** through Criminal Justice.

Level of Assurance: Reasonable. Endeavour provides clear future scope for the work which will contribute to the mitigating actions, with clearly defined ownership of the 12 work areas and agreed timelines.

Risk Score Trend:  There has been no short term change in the risk score. Although a number of new actions have started, we would expect these to only have a longer term impact as cases start going through courts and further analysis can be undertaken.

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register, which can be found here: [SR 77 RUI](#)

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<p>Endeavour is a cross-departmental programme focused on transforming the way TVP investigates crime, and improving outcomes.</p> <p>A Bronze Endeavour RUI Group has been launched, which is developing various pieces of work to improve the situation. These include:</p>	ACC De Meyer	30/09/2019	<p>Endeavour will work in 12 key areas to improve investigative quality, working cross departmentally:</p> <ul style="list-style-type: none"> • Managing bail and RUI. • Training to manage initial investigation within Contact Management. • Review of current investigative structures • Status of crime investigation maximising capacity: attraction, recruitment, development, retention. 	ACC De Meyer	30/09/2019

<ul style="list-style-type: none"> • A target to increase our use of bail when the necessity and proportionality test has been met. • Improving our guidance and decision making recording around the bail back to RUI process. • Develop best practice to manage the timeliness and quality of RUI investigations in line with the NPCC operational guidance. • Promote the function of the new RUI toolkit to provide deeper analysis of on-going investigations. • Develop an effective process of reviewing criticality where we fail to meet our timescales for prosecution, and to reduce the number of RUI investigations over 180 days. • Ensure effective use of police systems for recording, managing, monitoring and finalising our RUI investigations. 			<ul style="list-style-type: none"> • Requirements of investigation and training • Exemplar of CPIA practice. • Use of technology to ensure efficient and effective investigation. • Work in partnership to be an exemplar of file quality. • Developing supervisors and managers of investigations. • Development of coherent principles of crime management. • Forensics. • Victim satisfaction. <p>Process and timelines are being progressed.</p>		
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The group is supported by analysis undertaken by SGU into the impacts of RUI.					
The RUI Toolkit has been set up and rolled out and is assisting LPAs in their regular reviews of RUIs. This provides detailed information on the use of RUI and shows all offences that are listed as currently being RUI.	Karin Williams Cuss	21/07/2019	Service Improvement are working on providing Local Criminal Justice Groups (Berks, and Oxon and Bucks) some predictive analysis in relation to demand for the next 6 months as they are reviewing the Court listing pattern next month.	Karin Williams Cuss	21/08/2019

SR 56 – Livelink

Risk summary: Livelink is required to remain functional until January 2020, increasing the likelihood of operational issues.

Consequences:

- Loss of access could have significant operation impact, i.e. no access to the Force Daily Management Meetings, Daily Force Briefings, Intel Briefings, HR files, FRAMS and Pre FRAMS.
- Resulting impact on public safety.
- No ICT resource to support Livelink is secured and system support is ineffective.
- Usability and accessibility issues with Knowzone.
- Inability to recover old records and documents.

Risk Owner: ACO Cooper **Risk leads:** Mark Gould - Senior Records Manager; Marion Peuleve - Head of the Joint Information Management Unit


Reviewed with risk owner / risk leads: 18/08/19

Next Review Date: 30/09/19

Context: An extraordinary SharePoint Project Board agreed an extension to the programme until January 2020, due to the impact of a design change by the project architects, which has lengthened the build period by the 3rd party supplier. This delay would have taken the project into December, when ICT operate a planned change freeze due to capacity issues and the shortness of the working month. Therefore the Project Board have agreed a revised launch date of Jan 2020. To maximise the use of this time multiple workshops with key enabling stakeholders around SharePoint are taking place to pave the way for this business change.

This risk is currently being **TREATED** through the SharePoint Programme Board.

Level of Assurance: Reasonable. There is clear programme governance in place, with engaged senior leadership which is regularly reporting progress to key senior stakeholders. Programme risk registers are being completed, there are clear mechanisms for escalation and additional mitigating actions are being identified.

Risk Score Trend:  There are no significant changes to the risk score, despite the additional delay.

The table below summarises the active mitigating actions and future planned actions, taken from the risk register, which can be found here: [SR56 Livelink](#) and contains links to:

[LAMS Risk Log](#)

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<ul style="list-style-type: none"> Completed project plan. Discovery work on Livelink completed. Alfresco to be completed. Mitigation backup ongoing – incremental schedule. Civica High level design document submission to Architecture board (07/05/19). 	Mark Gould	21/07/2019	<p>Supplier issues have added a further 6 weeks to the programme.</p> <p>This time will be spent meeting with stakeholders to minimise the disruption.</p>	Terry Willat	30/07/2019

<ul style="list-style-type: none"> • Infographics created and distributed to site owners and site administrators. • Super user/ champion planning work commenced (with comms plan). • Held first workshop for site admin / site owners (29/04/19). 					
<p>The SharePoint Board have identified the following areas as being at a high operational risk should Livelink be unavailable for a week:</p> <ul style="list-style-type: none"> • Briefing databases • DMM • Inspector handovers • OCG documents • Priority Crime Group <p>The Project Chair is keen that the SharePoint Project Board have oversight of contingencies and risks.</p>	Mark Gould	1/12/18			

SR 80 – Equip / ERP Contractual

Risk summary: Failure to agree a re-plan between the Surrey, Sussex and TVP tri-force group (SSTVP) and the project contractors, KPMG.

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Consequences:

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- Requirement for extensive negotiations to reach an agreed plan.
- Temporary cessation of the programme until a resolution is achieved.
- Requirement to identify a new option.
- Programme failure.

Risk Owner: DCC Hogg

Reviewed with risk owner: 18/06/2019

Next Review Date: 30/09/2019

Context: There is a strategic on-going risk related to the size, scale and complexity of implementing the Equip Programme across the three forces of Surrey, Sussex and Thames Valley Police within the revised timescales and the significant resourcing commitment required to ensure full functionality is achieved.

This risk is currently being **TREATED** at a regional level.

Level of Assurance: Reasonable – There are regional level budgeting and monitoring processes in place within clear timescales, and TVP contributes to regional discussions through the Equip Programme Deployment Manager. Risks have been identified and there are clear processes in place to manage the impact of these to TVP.

Current mitigating actions		Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
1. Re-planning option under joint review. 2. External reviews underway. 3. Chief Constables engaged with KPMG senior management.		Bryan Morgan	30/08/2019	1. Re-planning option under joint review. 2. Outcome of reviews being considered. 3. Chief Constables engaged with KPMG senior management	Bryan Morgan	30/08/2019

SR 79 Equip / ERP System fails

Risk summary: The ERP System fails shortly after deployment or is deemed too unstable to be fit for purpose

Consequences:

- Increased risk of reliance on legacy systems and requirement to revert to 'old ways of working' impacting upon Force efficiencies and staffing levels
- Reputational impact to the Force of a major new system being seen to fail despite significant investment and testing.
- Significant increase in funding required to reinstate / maintain the Programme team.
- Workforce unrest due to lack of payment or correct leave allocation.
- Operational cover impacts due to a failure to maintain adequate sufficient officers on duty.

Risk Owner: DCC Hogg

Reviewed with risk owner: 18/06/2019

Next Review Date: 30/09/2019

Context: As with the introduction of all major new systems, Integration and User Acceptance testing will be a significant element of the programme planning work. The additional delay will allow further time for testing and to ensure the system is less likely to fail after launch.

This risk is currently being **TREATED** at a regional level.

Level of Assurance: Reasonable – There are significant regional level engagement in the re-planning activities to ensure the plan incorporate sufficient time for testing and hence mitigating the risks. TVP contributes to regional discussions through the Equip Programme Deployment Manager and ACO's, DCC and CC. Risks have been identified and there are clear processes in place to manage the impact of these to TVP.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
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1. Validation of infrastructure and system through appropriate and agreed levels of functional and non-functional testing. 2. Passage through agreed risk mitigation gates and feedback to Board. 3. Formal test sign-off. 4. Appropriate BCT and testing prior to go live. 5. Effective training of staff. 6. Programme Board Level 'Good to Go' approval	Bryan Morgan	30/08/2019	1. Systems Integration and User Acceptance testing to be scheduled as part of the programme re-planning work.	Bryan Morgan	30/08/2019
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SR 80 – Equip/ERP Delay

Risk summary: Equip / ERP being delayed beyond June 2020

The ERP system will replace the current legacy solutions which are ageing, heavily customised and have a large number of associated systems including PeopleSoft, Aptos and Capita in TVP.

Consequences:

- A delay to the ERP introduction will result in continued operation of the Legacy Systems identified above with increased potential for failure.
- If delays persist, the legacy system suppliers may no longer offer support to the systems increasing the potential of failure and increasing the time to return to operational status.
- Support costs for the legacy systems could continue to rise as the ability to maintain the system becomes harder.
- The on-going cost of delay will affect the Force's ability to utilise funds elsewhere and impact on other planned deliverables.
- The on-going reputational risk to the Force (and Brand) of not meeting delivery timelines may prove difficult and will need to be managed.
- Significant additional financial investment will be required to maintain the Programme Team.
- Delays to benefits realisation and financial benefits of a forecast £100k per month will be lost.
- Continued investment in legacy systems will be required.

Risk Owner: DCC Hogg

Reviewed with risk owner: 18/06/2019

Next Review Date: 30/09/2019

Context: The re-baselining has caused the TVP 'Go Live' to slip back from Nov 2019 to June 2020.

This risk is currently being **TREATED** at a regional level.

Level of Assurance: Reasonable – TVP is actively engaged with the programme at a tri-force level and locally within the force to ensure the mitigating actions are delivered.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
1. The Programme is re-baselining the plan in an attempt to minimise delays to the 'Go Live'. 2. Maintain Legacy system support and supplier engagement. 3. Manage business expectations 4. Review Business Continuity arrangements across the legacy systems. 5. Ensure all messages in respect of delivery are communicated and controlled via appropriate communication channels.	Bryan Morgan	30/08/2019	1. Ensure all messages in respect of Equip delivery are communicated and controlled via appropriate channels. 2. Provision of appropriate contingency, both financial and time, to be established.	Bryan Morgan	30/08/2019
			The Strategic Governance Unit are delivering a BC exercise with Tasking & Resilience to look at the impact of losing PeopleSoft.	Mark Horne	04/09 2019

SR 75 – CMP Delivery Delay

Risk summary: If there is delay to the delivery of the Contact Management Programme (CMP), then there are a number of on-going impacts operationally, financially and reputational damage to the Force.

Consequences:

- Extended reliance on legacy systems may impact on public safety.
- Continued reliance on legacy systems with increased potential for failure.
- If delays persist, the legacy system suppliers may no longer want to offer support to the systems increasing the potential of failure and increasing the time to return to operational status.
- Support costs for the legacy systems could continue to rise as the ability to maintain the system becomes harder.
- The on-going cost of delay will affect the Force's ability to utilise funds elsewhere and impact on other planned deliverables.
- The on-going reputational risk to the Force (and Brand) of not meeting delivery timelines may prove difficult and will need to be managed.


Risk Owner: ACC Hardcastle **Risk lead:** Perry Shears - CMP Programme Director

Reviewed with risk owner / risk leads: 30/07/19 **Next Review Date:** 30/09/19

Context: Crime Recording went live on 16/7/19 and progressed with minimal issues. However, the full go live has been further delayed. The CMP Programme Board are meeting on 27/09/2019 to monitor progress and consider the potential impact of a 31 October Brexit on the new proposed go-live date. The go-live on the Isle of Wight will enable full end-to-end process confirmation prior to full Force rollouts. The delay is not excessive and has not materially impacted on the risk.

This risk is currently being **TREATED** through the Programme Board.

Level of Assurance: Reasonable. There is clear programme governance in place, with engaged senior leadership which is regularly reporting progress to key senior stakeholders. Programme risk registers are being completed, there are clear mechanisms for escalation and additional mitigating actions are being identified.

Risk Score Trend:  The risk level has fallen as the testing phase of the project has produced positive results. Although a further delay has been identified, the Programme Board feels the delay is not excessive and has not materially impacted on the risk.

The table below summarises the active mitigating actions and future planned actions, taken from the risk register.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
Update 22/7/19 Crime Recording went live on 16/07/19 and has progressed with minimal issues. The full go-live in Hampshire Constabulary has been delayed to allow for the busier summer period to pass. The IoW go-live will occur as soon as performance is felt able to support the impact. This is currently estimated as late September. A further "Good to Go" will take place in September for the IoW. The go-live on the Isle of Wight (IoW) will enable full end-to-end process confirmation prior to full Force rollouts.	Perry Shears	30/09/2019	Ensure all messages in respect of CMP delivery are communicated and controlled via appropriate Force channels.	Perry Shears	30/09/2019

Update 2/7/19 Performance challenges in Hampshire Constabulary (HC) have resulted in service level failures with up to 60% of calls being abandoned over some weekends. As a result of this IoW and HC full go-live of CMP has been delayed. Implementation of CMP crime recording in HC has not adversely affected performance.	Ch Supt Lucy Hutson	30/09/2019	This has resulted in the formation of a Gold group which will be headed by Ch Supt Lucy Hutson to reduce the service level failures.		
Maintained support from key system holders and continue to extend existing support contracts where required (for example, OASIS) to maintain legacy systems during the transition reducing the risk from system failure.	Perry Shears	30/06/2019	.		

SR 76 – CMP Failure

Risk summary: The CMP System fails shortly after deployment or is deemed too unstable to be fit for purpose.

Consequences:

- Increased risk to the public due to non-availability of key THOR information as well as an inability to effectively deploy officers to incidents.
- Reputational impact to the Force of a major new system being seen to fail despite significant investment and testing.
- Loss of public confidence if key contact and deployment system perceived as flawed.
- Increased risk on both Forces whereas previous failures would only have affected one Force.


Risk Owner: ACC Hardcastle **Risk Lead:** Perry Shears - CMP Programme Director

Reviewed with CMP Programme Director: 30/06/19 **Next Review Date:** 30/09/19

Context: Performance Testing, User Acceptance Testing and Functional Testing have all been successfully completed. The Programme Board assess that the risk continues to fall, following successful testing.

This risk is currently being **TREATED** through the Programme Board, and the last stages of the testing programme.

Level of Assurance: Reasonable - There is clear programme governance in place, with engaged senior leadership and regular reporting of progress to key senior stakeholders. Programme risk registers are being completed, there are clear mechanisms for escalation and additional mitigating actions are being identified.

Risk Score Trend:  The risk level has fallen as the programme has completed the testing phase with positive results. As a result the likelihood of system failure is assessed as less likely and there is a small reduction in the expected impact of any failure should it occur.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
Update 22/7/19 Crime Recording went live on 16/7/19 and has progressed with minimal issues. The full go-live in HC has been delayed to allow for the busier summer period to pass. The loW go-live will occur as soon as performance is felt able to support the impact. This is currently estimated as late September. The go-live on	Perry Shears	30/09/2019	A further GTG will take place in September for the loW.	Perry Shears	15/09/2019

the Isle of Wight will enable full end-to-end process confirmation prior to full Force rollouts.					
Validation of Infrastructure and application through appropriate and agreed levels of testing both Functional and Non-Functional Passage through agreed risk mitigation gates and feedback to Board Formal Test Sign-Off Appropriate BCT and testing prior to go live Effective training of staff Programme Board Level 'Good to Go' approval	Perry Shears	20/06/19	Programme Board is working with SGU to ensure BC plans are in place in case of failure.	Perry Shears	30/09/2019

Risk Radar

Updated risks from programmes, projects and local risk registers

High Tech Crime Unit Infrastructure Instability

A fix to a software issue is in place, but there remains a risk of data corruption or interruption until complete resolution of the problem. This impacts on investigations, delaying criminal justice processes. Resolving the issue has an in-year financial implication. The risk is being appropriately managed by the department, is on the departmental risk register and does not need escalating at this time.

Forensics Suppliers

The National Police Chiefs' Council (NPCC) has approved the return of Eurofins Forensics Services to the forensics marketplace following the criminal cyber-attack suffered in June. From a TVP perspective, early action within the forensics team meant TVP were better prepared for later collation of information for the national groups and early engagement with CJ also assisted with this. This highlighted how forensics had learnt from the previous issues with Radox, Sytech and Key Forensics; the FIU team dealt with the issue almost as business as usual as they could predict what would be needed for the national groups re data, caps to submission process and updates. However, Forensics report turnaround times for all cases are still

extended beyond contractual ones, and we continue to manage submissions based on case timescales and risk. Road traffic toxicology is still delayed by a few months and this may impact on ongoing cases.

EU Exit risk

Ongoing work continues on the risks arising from a 'no-deal' exit from the EU and other Brexit-related scenarios. The risks raised in the February update remain under review while the political situation remains uncertain.

New entry routes into Policing and potential recruitment of additional officers

There are two new potential risks which need to be considered;

- (i) After discussion with the Recruitment and Retention Programme Manager, we have identified the following potential risk; "Whilst offering policing opportunities, the potential introduction of an additional 600 officers creates additional demands on TVP. This will include further demands on recruitment, training and mentors, and on resources such as training space, equipment and physical resource. It may also add complexity to the delivery of new entry routes into TVP and place pressure on the need to ensure new officers are retained by the force."

Work is ongoing to analyse the full extent of this potential risk, and as it is linked to the existing Recruitment and Retention risk CCMT agreed that this would be added to the strategic risk register.

- (ii) The move from the existing Initial Police Learning and Development Programme (IPLDP) to the training schedule proposed for the new entry routes into policing creates a number of risks for TVP, organisationally, culturally and to the workforce. Organisational risks include financial risks from the additional delivery costs of the new process and the negative impact on the deployable number of officers during the training period. Culturally, TVP may not fully appreciate the changes needed to work with Higher Education Institutes. In terms of the workforce, there are risks linked to resourcing the support needed to help recruits through a longer training programme and also in terms of helping recruits manage the extra demand of balancing case-loads and work-loads. Work is currently being carried out within People Directorate to assess the overall scale of the risk and plan appropriate mitigating actions.

CCMT have instructed that this risk continues to be managed locally, and for CCMT to be kept up to date with any changes.

An additional risk has been identified, regarding resourcing abstraction in 2020/21 as a result of these changes, and CCMT have requested that this should be treated as a strategic risk.

Voluntary attendance and the taking of biometrics

The use of biometric data is fundamental to the proper functioning of law enforcement, and to those responsible for preventing terrorism. Changes to the use of pre-charge bail made by the Policing and Crime Act 2017 have contributed to the increased use of voluntary attendance. Voluntary attendance is currently being used for a wide variety of offences and a failure to follow up and take the biometric data where permissible will result in an inability to conduct a future speculative search of the subject's biometrics and one route for determining any possible further risk is missed. Criminal Justice will be presenting an options paper to CCMT about how to address the backlog of voluntary interviews where we have not taken biometric information.

CCMT instructed that this risk continued to be managed as a local risk within the Criminal Justice Department but may require escalation: we will continue to monitor progress.

Proposed strategic risk updates

The Strategic Governance Unit are working with identified partners to do further research and analysis on the proposed strategic risks identified in the annual summary paper. This includes:

- Analysis of the potential impacts of funding cuts to our partners locally and regionally, and the extra demands this may place on future policing.
- Analysis of the effects of increased data volumes on demand.
- Input into the retention project board.
- Working to identify the full risks around new entry routes into TVP

Risk – next period

The risk activities planned for the next period include:

- Continue to develop the new strategic risks agreed by the 18 June 2019 CCMT meeting and work with identified risk leads to record and manage these risks.
- Develop a risk assurance model which helps departments and LPAs to prioritise risks and which supports effective decision-making.
- Identify risk champions across the force.
- Implement a communications strategy for risk management.
- Deliver risk related training / workshops targeted at anyone needing additional support writing risk registers, particularly those new in post.
- Develop a risk appetite model to use on an ad hoc basis to support decision-making.

Business Continuity Introduction

Business continuity is about ensuring that, as an organisation, we are able to continue providing important public services in the event of some major disruption to our organisation. Clearly if the Force is unable to maintain its own services, it will not be in a position to best serve the public.

The Civil Contingencies Act 2004 provides the statutory framework which places a responsibility on the police service, as “Category 1 Responders”, to have in place effective Business Continuity Management (BCM) processes. Thames Valley Police (TVP) follows the principles within “ISO22301 Societal Security – Preparedness and Continuity Management Systems” which was published in May 2012.

Guidance on organisational resilience was published in November 2014 (BS65000:2014) which defines organisational resilience as the ability to anticipate, prepare for, respond and adapt to events – both sudden shocks and gradual change.

A new standard, ISO22330 was published in 2016, which focuses on the people aspect of Business Continuity.

Oversight of the management of Business Continuity (BC) is provided by the Strategic Business Continuity Co-ordinating Group, which is held bi-annually, and chaired by the Corporate Governance Manager. This Group includes senior members from Property Services, ICT, Corporate Communications, HQ Operations, Health and Safety, and the Corporate Governance Officers.

Business Continuity Plans are maintained, tested and refreshed in respect of front line services and support functions. These are refreshed in order to reflect changes in personnel, dispositions, and core business processes. This proactive approach is supplemented by organisational learning from exercises and actual incidents.

This Report is provided to the CCMT for consideration and corporate decision making. It further provides the information necessary for the Joint Independent Audit Committee to fulfil their function effectively. Members are welcome to review the details of specific business continuity incidents or exercises by arrangement with the Strategic Governance team.

Force Business Continuity Incidents and Exercises

During the period 1 April 2019 to 31 August 2019 **four** business continuity incidents with BCPs invoked were reported. A further incident was reported in September 2019.

The first two incidents were reported to the June meeting

Date	Location	Details
04/04/2019 07.45 – 9.30	HQ South / LPAs	<p>A Nortel passport network switch (a piece of equipment in the process of being upgraded) has had a power supply issue with only one of three power supplies functioning. The outage lasted approximately 1 hour and 50 minutes.</p> <p>Impact</p> <ul style="list-style-type: none"> • Loss of Command and Control, exchange and CHARM along with a range of connected services. • Resultant backlog of work in control rooms. <p>Outcome</p> <ul style="list-style-type: none"> • No impact on deployment or incoming calls and so no impact on public safety. Recovery period to get all paperwork logged back onto the system was 2.5 hours; this is because it was a staggered recovery. • Switch has been repaired up to 2 power supplies. • Some services such as PeopleSoft and Livelink took longer to restore, in line with ICT prioritisation. • The use of moving to a paper-based process has created some issues about disclosure, which will be addressed as part of the Business continuity plans introduced for CMP. <p>The Business Continuity plan proved effective in mitigating the impact, and the network switch upgrade has now been completed so there is no residual risk.</p>
09/05/2019 11.50 – 12.10	Abingdon Control Room	<p>A router issue resulted in a loss of Abingdon Control Room. Although this was classed as a P2 ICT event, Contact Management's concerns about immediate network stability resulted in them invoking their BC plan.</p>

		<p>Impact</p> <ul style="list-style-type: none"> • Loss of telephony and networks at Abingdon Control Room. • Milton Keynes picked up call groups. • ICT switched to router 2, this enabled us to get the network and dispatch back within the room. • Staff were dispatched to HQ North to handle calls until stability was confirmed. <p>Outcomes</p> <ul style="list-style-type: none"> • No impact on deployment or incoming calls and so no impact on public safety. • Identified that there needs to be clearer reporting of non P1 incidents if they lead to departmental BC plans being invoked. <p>The pre-emptive use of the Business Continuity plan to manage potential future stability issues was effective in mitigating future risk. The router recovery was successful and at this stage there appears to be no residual risk.</p>
21/08/2019	Control Rooms	<p>Water leak in BT premises caused damage which took down 18 Airwave masts and Abingdon CR's ability to take radios for 28 hours and 45 minutes.</p> <p>Impact</p> <ul style="list-style-type: none"> • Abingdon unable to take radios and reduced capacity of airwave coverage in several areas. <p>Outcomes</p> <ul style="list-style-type: none"> • No reported impact on deployment or incoming calls and so no impact on public safety. • Other masts provided coverage to most areas and staff were transferred to MK to cover, through normal business continuity plans. • A mobile mast was deployed to Wantage when coverage was lost there.
26/08/2019	Abingdon Control Room	<p>Radiocom 7 x ICCS terminal failures in Abingdon CR Airwave resulted in loss of terminals for 3 hours and 30 minutes.</p> <p>Impact</p>

		<ul style="list-style-type: none"> Abingdon unable to take radios. <p>Outcomes</p> <ul style="list-style-type: none"> Airwave NOC resolved issue with co-ax cable at Luton. Business implemented normal business continuity plans to manage impact
01/09/2019	Banbury Training Centre	<p>There was flooding in the Banbury Driving School building which created significant water damage to the building and equipment within it.</p> <p>Impact</p> <ul style="list-style-type: none"> At 3 September, business continuity plans are in place to facilitate all existing driver training courses. The building is expected to be out of use for several months, although it is too early at this stage to accurately assess the full extent of the damage and long term impact on the Driving School. Further updates will be provided in the next report.

Business Continuity exercises were delivered with:

- 07/05/2019 - **Local Policing.** The exercise was based on limited staff availability due to a fuel shortage as a result of a “no-deal” Brexit. The exercise demonstrated that, within the context of a business continuity incident, HQ based Local Policing had a clear understanding of their critical functions and as a result were able to prioritise their work in the short term to mitigate the impact of the incident.
- 08/05/2019 – **Procurement.** The exercise was based on limited staff availability due to a fuel shortage as a result of a “no-deal” Brexit. The exercise demonstrated that Procurement had a clear understanding of their critical functions and the impacts on the supply chain, and as a result were able to prioritise their work in the short term to mitigate the impact of the incident. Useful work has been done on addressing supply chain BC plans.
- 15/05/2019 – **Professional Standards.** The exercise was based on a 5 day power outage affecting HQ North, HQ South and stations in Bicester and Oxford. The exercise demonstrated that PSD had a full understanding of their local critical functions and how these contributed to Force

objectives. Responses were people focussed and demonstrated a good understanding of wider issues, such as supporting the work of others, and areas where their work may effect members of the public.

- 28/05/2019 – **Reading LPA**. The exercise was based on the loss of access to Reading Police station. As an LPA, the team were quick to use their experience of managing critical incidents in this situation and showed a good understanding of force interdependencies and identified their critical activities and how to maintain them effectively. This included identifying partners within the station, and working cross-departmentally to deliver effective outcomes, with a focus on response policing and crime investigation. The main action points were around the provision of fire drills, and having access to BC plans at control rooms.
- 29/05/2019 – **JIMU**. The exercise was based on a flu pandemic. The team quickly identified local and organisational critical functions and priorities and how to deliver them within the scenario. The department understood the concepts of business continuity planning and demonstrated a positive approach to staff wellbeing. Lessons learnt were shared and an action plan created.
- 11/07/2019 – **CTPSE**. The exercise was based on a power failure and subsequent loss of ICT systems. The people in the room had an appropriate level of knowledge and understood the key tenets of the BC plans, and identified all the key points in their plan, including the impact of a range of ICT issues and the need for dynamic risk assessments.
- 26/07/2019 – **Cherwell and West LPA / Custody**. The exercise was based on a power failure at Banbury station, including the custody suite. Priorities were quickly identified at a LPA level and immediate mitigating actions were agreed. Realistic and considered options were provided for relocating custody, with secondary options identified and risks identified. Overall, the exercise demonstrated that the various departments on the site had a good understanding of the interdependencies affecting business continuity planning.

Lessons Learnt

There is a need to ensure that all areas know the location and content of Business Continuity plans - SGU have improved accessibility by adding BC Plans to Resilience Direct.

Need to ensure that departmental BC Plans are not subject to any form of "single point of failure".

There is a continued need to liaise with Property Services to effectively manage space allocation in a BC incident.

End users have requested a one page checklist to help them manage the immediate impacts of a BC incident.

Ensure that interdepartmental dependencies are identified and contact between departments is developed. Business Impact Assessments will help with this.

During a process of change, we need to ensure that BC plans adapt to those changes and reflect new processes; e.g. whilst the BC Plan was suitable for current command and control, it will need work for CMP.

SGU needs to ensure that Command and Control hold copies of LPA BC plans, ideally on the Command and Control system, as this would be where LPAs would make contact if plans were not available.

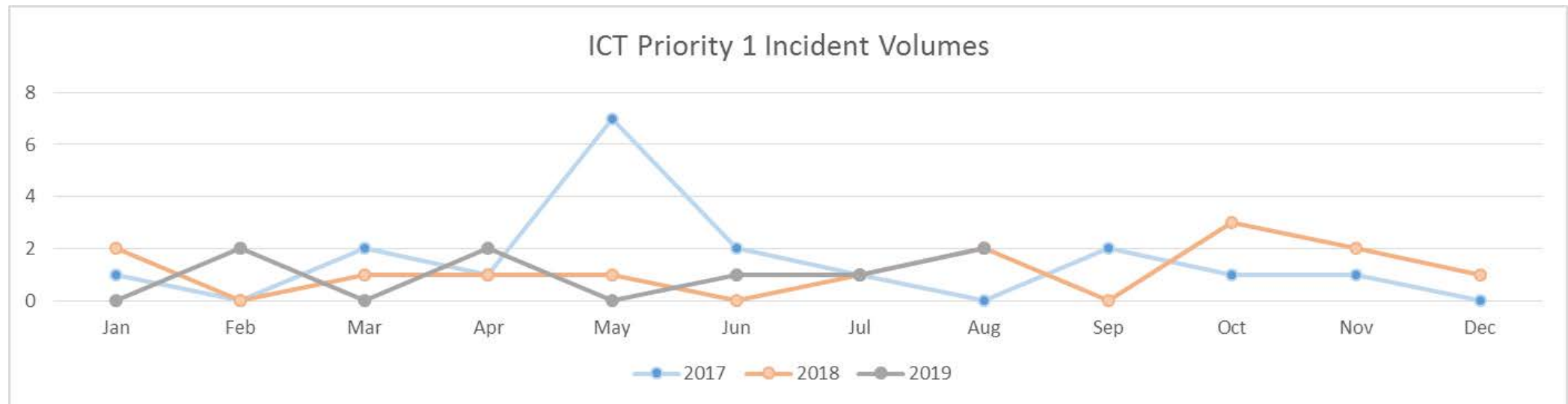
ICT Priority Incidents

During this period (1 April 2019 – 31 August 2019) ICT submitted **6** priority one incidents. There were no priority 1 incidents which directly caused a business continuity plan to be invoked by ICT. However, Contact Management pre-emptively invoked Business Continuity Plans on 3 occasions to reduce any potential impact of a loss in network stability.

We have included a September event to ensure JIAC have as up to date information as possible.

For the purposes of ICT incident reporting, a P1 incident is defined as “an ICT event which impacts the whole force, with a fix time required of less than 4 hours.”

ICT P1 Incident Volume Trend



A summary of the P1 incidents is included below. Analysis of the incidents shows no underlying pattern or trend which might lead to future business continuity incidents.

Date/Time Raised	Site Affected	Incident Details	Incident Type	Impact	Root Cause (Closing comments)
04/04/2019 07:42	TVP	TVP Network issues impacting system access over a number of sites.	Network	High - all Contact Management sites, Aylesbury, Taplow, Bicester and some HQ Depts unable to access the Network.	Hardware failure. Nortel SW02 at Fountain Court lost power, mains breaker also flipped. Reset mains breaker and replaced one power supply.
10/04/2019 21:03	MK CR	Network drop out affecting access to computers and phones in Contact Management at Milton Keynes for two 5 minute periods.	Network	High - Operators unable to access primary systems and phones in Milton Keynes Control Room. Control Room in Abingdon and Contact Centre in Kidlington unaffected and re-routing of calls and radios in place to minimise impact.	Two 5 minute Network drop outs in a 30 minute period which affected all systems and phones, preventing taking of 999 & 101 calls. Raised with BT but no fault found and issue did not reoccur, raised as a problem record to continue with internal investigations.
17/06/2019 15:05	TVP & HC	Police National Database (PND) unavailable for 2 hours 25 minutes.	Application	Police National Database (PND) not available. Database allows police service to share, access & search local force information on a national basis.	External suppliers (Logica) issue.

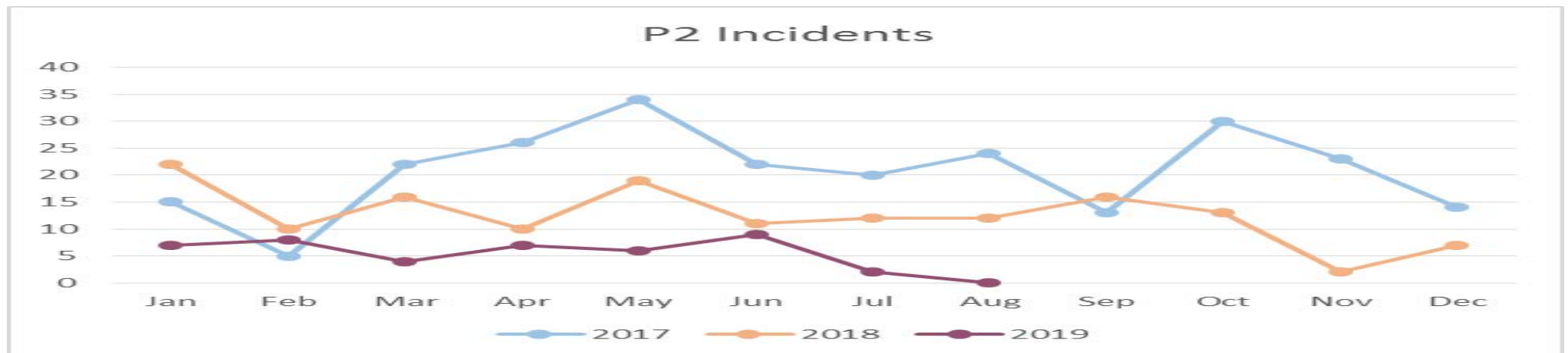
12/07/2019 01:05	TVP	Network unavailable on multiple sites for 1 hour and 10 minutes	Network	Critical - Multiple sites in TVP no network or phones, including both control rooms	Outage caused by BT change CHG0034329, the failover did not work f which took down network connectivity for multiple sites. After service was restored for main sites 22 satellite sites were still down which were worked on over the course of the day as manual intervention was required.
21/08/2019 21:16:00	TVP	Control Room Radios and 18 masts unavailable for 28 hours and 45 minutes	Airwave	High - Abingdon unable to take radios and reduced capacity of airwave coverage in several areas	Water leak in BT premises caused damage which took down 18 Airwave masts and Abingdon CR's ability to take radios. Other masts provided coverage to most areas and staff were transferred to MK to cover, through normal business continuity plans. A mobile mast was deployed to Wantage when coverage was lost there. Rack replaced and service restored by 02:00 23/08/2019.
26/08/2019	Abingdon Control Room	Radiocom 7 x ICCS terminal failures in Abingdon CR	Airwave	Very high – loss of terminals for 3 hours and 30 minutes.	Airwave NOC resolved issue with co-ax cable at Luton. Business implemented normal business continuity plans to manage impact

07/09/19 11:00	TVP	Public online reporting via the website unavailable between 05:22 on 06/09/2019 and 08/09/2019 (early am)	Online reporting system	High – Public reporting 06/09/2019: 86 online reports sent by public and 4 received into the unit. 07/09/2019: 65 online reports were sent by public and 38 received.	Unclear at time of writing – national suppliers – the system up and running and to be monitored by the Home Office for the future. Missing reports have all been recovered (10/09/2019) with no criticality.
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P2 incidents are reported in order to allow assessment of any underlying trend or issue which might, if not addressed, lead to a business continuity incident. The data has been reviewed to provide a monthly breakdown of incidents to reflect P1 reporting.

For the purposes of ICT incident reporting, a P2 incident is defined as “an ICT event which impacts on a single department or site, with a fix time required of less than 8 hours.”

In this period (1 April – 31 August 2019) **24** P2 incidents were reported, which shows a slight fall from the previous year.



Overall there is a fall in P2 incidents, which is partly attributable to a previous change in reporting criteria, but also suggests a greater level of operational stability. Whilst in this reporting period there has been one P2 incident which contributed to the use of a Business Continuity plan at the Abingdon Control room, there is nothing to suggest that the P2 incidents generally create business continuity concerns.

Business Continuity activities

- New BC templates have been introduced, and work is in progress to update plans in the new template.
- A new exercise programme has been introduced, with 7 exercises delivered in this period and a further 4 planned in the next period, which we will report back on in the next report.
- TVP have recently taken the lead on updating the Contact Management BC plan to include CMP. We are working with Contact Management and ICT to identify new BC issues.
- Brexit BC plans are in place.

Business Continuity – next period

The business continuity activities planned for the next period include:

- Focus on delivering meaningful exercises with an aim to have completed exercises in all key areas by December 2019.
- Deliver a strategic level BC exercise at Milton Keynes on 18 October to reflect a loss of a large site involving a range of functions.
- Work with Contact Management to deliver a new BC Plan which reflects the opportunities provided by CMP.
- Deliver a BC exercise within 2 weeks of CMP becoming fully operational.
- Developing and launching a BC communications plan to help more officers and staff understand the importance of BC planning.
- Ensuring all BCPs are up to date and are fully GDPR compliant.

Financial comments

There are no direct financial implications arising from this report.

Legal comments

There are no legal implications arising from this report.

Equality comments

There are no equality considerations arising from this report.

OFFICERS' APPROVAL

We have been consulted about the proposal and confirm that financial and legal advice have been taken into account in the preparation of this report. We are satisfied that this is an appropriate request to be submitted to the Joint Independent Audit Committee.

Chief Constable

Date

Director of Finance

Date

Joint Independent Audit Committee (JIAC)

JIAC Summary

In accordance with the Operating Principles of the Committee agreed at its first meeting held on 27 March 2013, the Committee has the following responsibilities in respect of business continuity:

- Consider and comment upon strategic risk management and business continuity management processes, and
- Receive and consider assurances that business continuity and organisational risks are being managed effectively and that published goals and objectives will be achieved efficiently and economically, making recommendations as necessary

The attached report provides an annual overview of risk management and business continuity management policy and processes adopted by the Office of the PCC together with the most recent quarterly progress update report.

Recommendation: The Committee is invited to review and note the report as appropriate.	
Chairman of the Joint Independent Audit Committee I hereby approve the recommendation above.	
Signature	Date

Risk Management Introduction

Effective risk management is one of the foundations of good governance. A sound understanding of risks and their management is essential if the PCC is to achieve his objectives, use resources effectively, and identify and exploit new business opportunities. Consequently, in common with all significant public and private sector bodies, the Office of the PCC has an established control framework for ensuring that areas of risk are identified and managed appropriately across its activities, which mirrors that used by the force.

There were seven active risks on the OPCC risk register (listed in table below). Since the last meeting one risk (OPCC 25) has been closed. OPCC 25 was the risk that 'The change from Data Protection Act to General Data Protection Regulation (GDPR) requirements has increased the scale of potential financial penalties resulting from non-compliance'.

OPCC Risk Summary

The table below shows the direction of travel of each risk score and the current risk management status as agreed by the OPCC Senior Management Group. A more detailed description of the risk, including rationale for any change in risk level, is then provided in the risk summaries which follow.

Scoring is based on a 4 x 4 matrix and the direction of travel and the risk scores from the last quarter are included to provide a clear indication of the magnitude and direction of any change.

All risks have been reviewed and re-scored with input from the risk owners.

OPCC 25 has now been closed leaving six active risks going forward.

Risk description and link to full document	Previous risk and score (I x L)	Sept 19 Risk Score	Trend	Risk Owner	Current Risk action
OPCC 18 - Funding The level of funding may be insufficient to deliver the planned outcomes in PCC's Police and Crime Plan 2017-21	6 (2.6x2.3)	5 (2.6*2)	↓	Ian Thompson	TREAT
OPCC 19 – Victim services By promoting the Victims First service the demand for victim services could exceed the supply available from PCC-commissioned contracts / service providers	5 (2.2 x 2.3)	5 (2.1*2.3)	↔	Shona Morrison	TREAT
OPCC 21 – Specialist Counselling Service Review of the OPCC victims 'specialist counselling service' identifies potential weaknesses in internal management controls and administrative procedures that requires significant investment in OPCC time, resource and cost to rectify	5 (2.2x2.5)	7 (2.4*3)	↑	Shona Morrison	TREAT
OPCC 23 – New demands on OPCC Failure to respond to new additional statutory responsibilities; increased volume of service demand and/or changes in type of service demand for services provided and/or commissioned by the OPCC	5 (2.2x2)	6 (2.3*2.5)	↑	Paul Hammond	TREAT
OPCC 24 – Specialist victims' services not in place before April 2020 The OPCC commissioning process fails and new specialist victims services are not in place before 1st April 2020 when current contracts expire	5 (2.4x2)	5 (2.3*2)	↔	Shona Morrison	TREAT
OPCC 25 – GDPR compliance The change from Data Protection Act to General Data Protection Regulation (GDPR) requirements has increased the scale of potential financial penalties resulting from non-compliance	3 (2 x 1.3)	3 (2*1.3)	↔	Vicki Waskett	CLOSED
OPCC 26 – Safeguarding responsibilities in the Victims First hub Failure to meet safeguarding responsibilities in the Victims First Hub resulting in harm to victims and/or reputational damage for the PCC	5 (2.3*2)	5 (2.3*2)	↔	Shona Morrison	TREAT

Current Strategic risk update

Risks are listed in current priority order, as identified by current scoring. Risk summaries include an assurance level, using the following definitions.

Substantial	The governance, risk management and control arrangements are strong, although some minor action may be required to improve efficiency or effectiveness.
Reasonable	The governance, risk management and control arrangements are good, although some action is required to improve efficiency or effectiveness.
Limited	The governance, risk management and control arrangements are limited and action is required to improve efficiency or effectiveness.
Minimal	The governance, risk management and control arrangements are weak and significant action is required to improve efficiency or effectiveness.

The levels of assurance provided are based on the risk summary and input from the risk owner, the additional documents supplied which outline the more detailed activities and benchmarking where this is available. In future this will also include how effective mitigating actions have been in the past, and confidence around the potential effectiveness of future actions.

OPCC 18 – Funding

Risk Summary - The level of funding may be insufficient to deliver the planned outcomes in PCC's Police and Crime Plan 2017-21
Consequences:

- Level of funding is insufficient to maintain the current level of service against increasing demands
- PCC unable to demonstrate that he has delivered his manifesto commitments and Police & Crime Plan objectives and targets
- Partnership working does not take place at the required level

Risk Owner: Ian Thompson


Reviewed: 19/06/2019

Next Review Date: 23/08/2019

Context: The positive police grant funding settlement for 2019/20 alleviated the immediate financial risk but the PCC needs to remain focused on providing sustainable and affordable public services in the long term which is difficult with the high degree of uncertainty around future funding levels. The Spending Review announcement on 4th September provided an additional £750m nationally in 2020/21 to recruit an additional 20,000 police officers, as well as to fund pay and price rises, and other growth requirements. Local police office allocations are expected in the next few weeks. The current Police and Crime Plan expires in 2021 so the risk of not delivering those priorities is now lower than it would have been a few years ago.

This risk is currently being **TREATED** through the normal budgeting processes in place.

Level of Assurance: Reasonable. There are well established budgeting and monitoring processes in place with clear timescales. The Force has a clear medium term financial plan for both capital and revenue expenditure and there is an annual process of external audit in relation to the financial processes. The additional grant money in both 2019/20 (part year) and 2020/21 to recruit extra police officers will help alleviate financial and operational pressures

Risk Score Trend:  As we near the end of the current Police and Crime Plan period (2017 – 2021) the impact and likelihood scores should continue to fall.

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register. The document references the supporting Level 1 Finance papers, which includes budgets and financial plans.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<p>The current financial projections for 2019/20, which includes future costs and budgeted income / expenditure, were reported to the January 2019 PCC Level 1 meeting. That report concluded the budget setting process for 2019/20.</p> <p>That document will form the basis for the 2020/21 planning cycle, commencing July 2019 and running during the year as new information becomes available, finishing January 2020.</p>	Ian Thompson	June 2020	<p>A number of factors are recognised as potentially impacting on the 2020/21 budget and will be factored into the annual planning cycle as far as possible:</p> <ul style="list-style-type: none"> • The short-term horizon of future central economic decisions and the impact this has on TVP ability to plan • Current political uncertainties • Changes in the CC and PCC roles and possible changes in TVP priorities • Future changes around partnership funding and the impact on TVP • The Spending Review announcement on 4 September 2019 • Funding Formula Review <p>These areas will be monitored and analysed throughout the year and feed into the service and financial planning cycle.</p>	Ian Thompson	31/01/20

Risk summary: By promoting the Victims First service the demand for victims' services could exceed the supply available from PCC-commissioned contracts / service providers

Consequences:

- The demand for victims services could exceed current supply
- The quality and/or quantity of service provided to victims is adversely affected
- Reputational damage for the PCC


Risk Owner: Shona Morrison

Reviewed: 19/06/2019

Next Review Date: 23/08/2019

Context: Although small changes in demand for services is to be expected, larger changes outside expected limits could stretch resources affecting the quality of services provided. Close monitoring of demand on services is undertaken through robust contract management of commissioned services, aided by the in-house Victims First Hub launched in March 2018. Strategic approaches to managing demand through the Hub have been introduced at times of peak volume, such as prioritisation of serious crime and vulnerable people. Contracts have been varied as necessary and waiting lists introduced for some services. New contracts commissioning in 2019, due to launch in Apr 2020, address some problems by introducing a strategic partner to coordinate provision and allow a more flexible approach.

Level of Assurance: Reasonable. There are robust contract management processes in place and good relationships between OPCC staff and providers. Response to new contract approach was positive and bids were received for both contracts. Contract award in on target and the OPCC will be closely involved in mobilisation to ensure they are delivered as planned. Greater flexibility afforded will reduce silo working between providers and increase options for support for victims who previously were under-served.

Risk Score Trend:  There are no significant changes to the score of this risk and it remains TREATED.

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
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<ul style="list-style-type: none"> • Temporary increases in demand on VF Hub assessment function managed by utilising OPCC Policy Officers to provide lateral cover and perform Victims First Officer functions on an 'as needed' basis. • Service provision by commissioned service providers varied by contract negotiation. • Prioritise and ration victims support service provision as necessary. • Main contracts re-tendered and uplifted (to be in place by 01/04/2020). New contract requirements include resilience in face of demand surges. 	Shona Morrison	May 2020	<ul style="list-style-type: none"> • Automatic Data Transfer from Niche to be updated to eliminate victim data transfer errors. • Consideration to increase Hub staff to full complement (6 Victims First Officers). • Mobilise new and increased contracts for Young Victims and Victims First Adult Specialist Service. 	Shona Morrison	31/10/2019
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OPCC 21 – Specialist Counselling Service

Risk summary: Review of the OPCC victims 'specialist counselling service' identifies potential weaknesses in internal management controls and administrative procedures that requires significant investment in OPCC time, resource and cost to rectify

Consequences:

Possible

- Loss of service to victims
- Reputational damage to the PCC
- Fined for non-compliance with GDPR requirements
- Victim pre-trial Therapy/Disclosure implications

Risk Owner: Shona Morrison

Reviewed: 24/01/19

Next Review Date: 23/08/19

Context: The Counselling Service has been developed and is coordinated in-house in the OPCC, using freelance counsellors who have been approved to deliver services through an application process. Review of the service was undertaken and some concerns arose, some which were highlighted by the review, and others which arose during the same period. Most significant of which was a concern that adequate and effective financial controls may not have been in place to closely oversee spend and ensure services funded had been delivered. An audit was undertaken which confirmed that payment control was weak.

This risk is currently being **TREATED** through the OPCC.

Level of Assurance: Reasonable: Through immediate remedial action involving halting new referrals to the service, reviewing all counsellor applications to confirm 'approval' status, and introducing better invoicing, record keeping and management oversight of the payment system, many of the problems identified will be resolved moving forwards. Further improvements to the application process, session capping and client feedback are also in the pipeline. The new Policy Officer to oversee this service is now in post.

Risk Score Trend:



There are significant changes to the score of this risk and it remains TREATED

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<ul style="list-style-type: none"> Internal Audit review of payment processes and controls was commissioned and OPCC currently responding to findings and recommendations, including improvements to financial controls to strengthen invoice and payment systems and tighter progress report monitoring. Counselling pathways kept intentionally narrow so that only existing victims' support services can refer in. External consultant recruited to conduct end-to-end quality review. Responsibility for day-to-day management of counselling service reviewed and moved to new Policy Officer post, with support from within VF Hub. Consent of victims to share data is recorded. Counsellor contracts incorporate data protection requirements. 	Shona Morrison	May 2020	<ul style="list-style-type: none"> Follow-up internal audit review of the changes made to financial management and control arrangements (particularly in respect of ordering, invoicing and payment processes for counselling services) Develop Counselling Service performance management regime and KPIs, to be monitored as part of VF Hub management. Day-to-day counselling service management is now under care of new Policy Officer role ('Specialist Services') with admin support from a Victims First Hub officer. Other victim support services exist which could step in if required. Work with Gallery Partnership to develop automatic data cleansing triggered by deletion dates already within the case management system (to remove manual cleansing) Implement Pre-Trial Therapy protocol (in liaison with TVP Prosecutions group). Include guidance within updated counsellor contracts (informed by OPCC Governance Manager - currently in draft). 	Shona Morrison	

<p>Contract with Gallery Partnership (VF Hub data processor) is GDPR compliant.</p> <ul style="list-style-type: none">• SM in discussions with TVP about pre-trial disclosure generally. Policy Officer tasked to draft pre-trial therapy protocol (which counsellors will be required to sign up to). Policy Manager copied into and monitoring disclosure requests.					
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OPCC 23 – New demands on OPCC

Risk summary: Failure to respond to new additional statutory responsibilities, increased volume of service demand and/or changes in type of service demand for services provided and/or commissioned by OPCC

Consequences:

- Failure of PCC to discharge statutory responsibilities
- Reputational damage – public criticism by Home Secretary, Victims Commissioner, statutory partners and Police and Crime Panel

Risk Owner: Paul Hammond

Reviewed: 04/09/2019

Next Review Date: 14/10/2019

Context: There is an incremental shift in additional responsibilities towards PCCs, e.g. taking on role of police complaints appellate body; gathering performance data regarding criminal justice agencies to hold them to account within local criminal justice bodies; strengthening the role of PCCs within future probation service arrangements, current Victims' Commissioner proposal to the Home Office for PCCs to act as the 'final arbitrators' of the 'Community Trigger', etc. These developments could have resource implications for PCCs (staff and budget) that may not be specifically funded.

This risk is currently being **TREATED** through the OPCC.

Level of Assurance: Reasonable. These developments and associated implications are monitored and considered internally within the OPCC (via SOG, SMG and discussions with the Chief Constable, as appropriate) and externally via relevant well established representative bodies (e.g. APCC, NPCC, LCJB), professional bodies (e.g. APAC²E, PaCCTS) and other stakeholders (e.g. Police and Crime Panel, HMICFRS).

Risk Score Trend:



There are changes to the score of this risk and it remains TREATED

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
Service planning informed by Home Office / APCC / APACE / PACCTS / HMICFRS / LCJB / TVP / OPCC information, advice and guidance	P Hammond	31/12/2019	Annual review of OPCC capacity (staff and budget) and capability	P Hammond	30/11/2019
Consultation with stakeholders when preparing PCC's Police and Crime Plan			Monitor and review new HO policy initiatives		31/03/2021
External scrutiny by Police and Crime Panel.			PCC commitment to review Police and Crime Plan on an annual basis		
OPCC internal monitoring of performance and service delivery			Annual review of internal OPCC Strategic Delivery Plan		31/03/2020
Dep PCC chairs LCJB and compliance monitoring can take place through this platform.			VCoP Framework and data requirements to be discussed via LCJB.		

OPCC 24 – Specialist victims services not in place before April 2020

Risk summary: The OPCC commissioning process fails and new specialist victims' services are not in place before 1st April 2020 when current contracts expire

Consequences:

- Vulnerable victims do not receive an appropriate type and level of service.
- Reputational damage.
- Impact on existing service providers.

Risk Owner: Shona Morrison


Reviewed: 19/06/19

Next Review Date: 23/08/19

Context: As many of the PCC's commissioned services come to the end of contract life in March 2020, re-commissioning was necessary. Planned market engagement events took place between November 2018 and April 2019 and attracted significant engagement from providers who informed the process and the final specifications. Tenders were released in early July 2019 and closed in late August. Successful bidders have been chosen and contract award is on track. Mobilisation of contracts anticipated from October 2019 through to end March 2020 when they will replace the existing contracts.

This risk is currently being **TREATED** through the OPCC.

Level of Assurance: Reasonable: Due to a successful procurement process, capable bidder attracted and meet qualifying criteria to be awarded contracts. Close OPCC involvement throughout mobilisation will ensure timetable is followed, and highlight early any problems or potential delays to launching the new contracts.

Risk Score Trend:  There are no significant changes to the score of this risk and it remains TREATED

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register.

Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<p>Existing services / provider contracts may be extended on a short-term basis.</p> <p>Commissioning Plan is being developed and implemented</p> <p>Existing service providers are being consulted & kept informed of process</p>	Shona Morrison	Dec 2019	<ul style="list-style-type: none"> • Market engagement meetings with potential service providers underway • Procurement timetable requires tendering documents to be published in July 2019 • Bidders received for both services and timetable for selection on track to award by early Oct. 2019 	Shona Morrison	30/11/2019

OPCC 26 – Safeguarding responsibilities in the Victims First Hub

Risk summary: Failure to meet safeguarding responsibilities in the Victims First Hub resulting in harm to victims and/or reputational damage for the PCC

Consequences:

- Harm to victims.
- Reputational damage.
- Impact on Victims First staff.

Risk Owner: Shona Morrison


Reviewed: 19/06/2019

Next Review Date: 23/08/2019

Context: Since taking the police referral mechanism for victim's services in-house within the OPCC, the OPCC carries an enhanced safeguarding responsibility to ensure that staff are suitably trained and appropriately supervised to identify, assess and manage risk to victims, or others who they come into contact.

This risk is currently being **TREATED** through the OPCC.

Level of Assurance: Reasonable: In addition to initial safeguarding training, enhanced training has been received by staff in negotiation skills, suicide management and mental health awareness. Policies relating to managing risk have been reinforced with staff. Further enhanced safeguarding training will be introduced along with clinical supervision to support the well-being of members of staff and further improve their skills.

Risk Score Trend:  There are no significant changes to the score of this risk and it remains TREATED

The table below summarises the active mitigating actions and future planned actions, taken from the new format risk register.

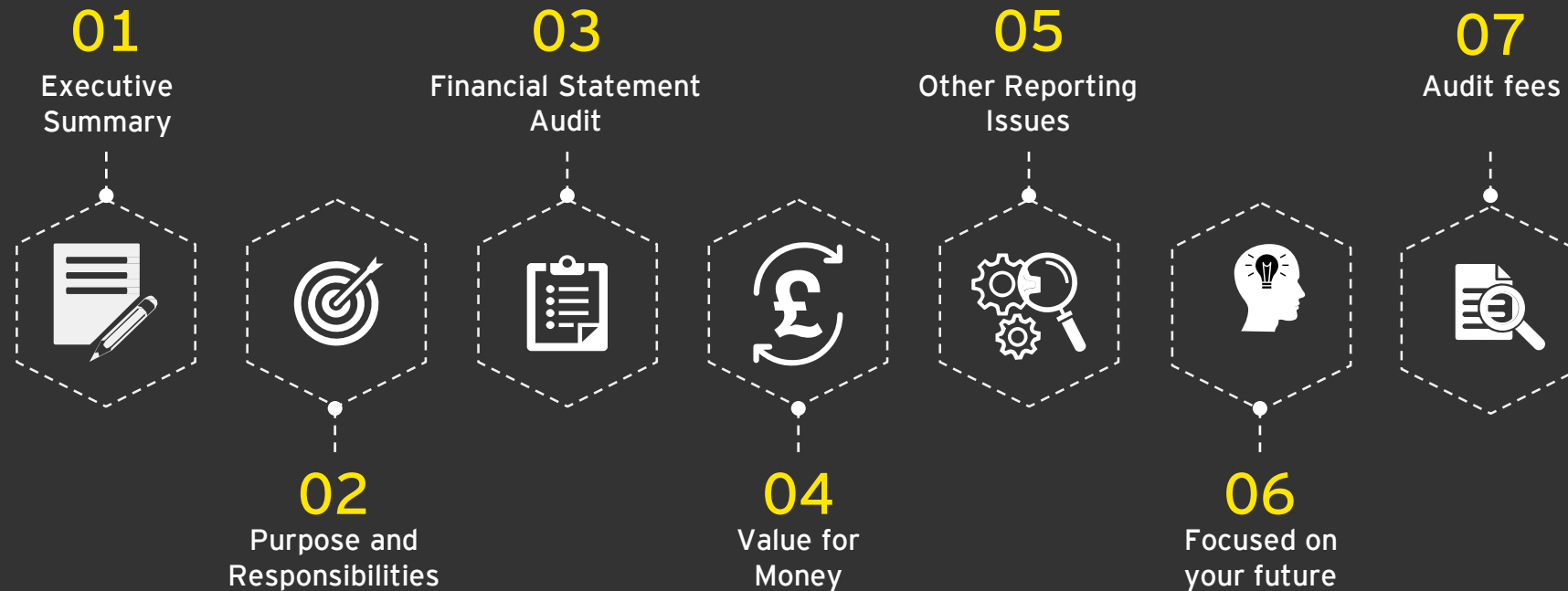
Current mitigating actions	Owned by	Completion date	Future Actions required / agreed	Owned by	Target date
<p>All Victims First staff have been trained up to safeguarding Level 1.</p> <p>All VF staff have received training in handling clients with possible Mental Health issues</p> <p>All staff have received further 'victim suicide threat' response training from police negotiator.</p>	Shona Morrison		<p>All VF staff to receive further safeguarding training</p> <p>Provision of clinical supervision for staff</p> <p>Handling procedures for clients with Mental Health issues will be clearly explained in VF Hub operating manual</p> <p>Team Leader being appointed (interviews arranged for 25/08/2019) who will be Hub Safeguarding Lead.</p>	Shona Morrison	31/03/2020

Police & Crime Commissioner for Thames Valley

Annual Audit Letter for the year
ended 31 March 2019

August 2019

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Public Sector Audit Appointments Ltd (PSAA) have issued a 'Statement of responsibilities of auditors and audited bodies'. It is available from the Chief Executive of each audited body and via the PSAA website (www.psaa.co.uk).

This Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The 'Terms of Appointment (updated April 2018)' issued by PSAA set out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Annual Audit Letter is prepared in the context of the Statement of responsibilities and Terms of Appointment. It is addressed to the Members of the audited body, and is prepared for their sole use. We, as appointed auditor, take no responsibility to any third party.

Our Complaints Procedure - If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, you may take the issue up with your usual partner or director contact. If you prefer an alternative route, please contact Steve Varley, our Managing Partner, 1 More London Place, London SE1 2AF. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. Should you remain dissatisfied with any aspect of our service, you may of course take matters up with our professional institute. We can provide further information on how you may contact our professional institute.



01 Executive Summary

Executive Summary

We are required to issue an annual audit letter to the Police and Crime Commissioner for Thames Valley Group (the PCC) following completion of our audit procedures for the year ended 31 March 2019. Below are the results and conclusions on the significant areas of the audit process.

Area of Work	Conclusion
Opinion on the PCC's:	Unqualified- the financial statements give a true and fair view of the financial position of the PCC Group as at 31 March 2019 and of its expenditure and income for the year then ended
▶ Financial statements	
▶ Consistency of other information published with the financial statements	Other information published with the financial statements was consistent with the Annual Accounts
Concluding on the PCC's arrangements for securing economy, efficiency and effectiveness	We concluded that you have put in place proper arrangements to secure value for money in your use of resources

Area of Work	Conclusion
Reports by exception:	
▶ Consistency of Governance Statement	The Governance Statement was consistent with our understanding of the PCC (Group)
▶ Public interest report	We had no matters to report in the public interest
▶ Written recommendations to the Authority, which should be copied to the Secretary of State	We had no matters to report
▶ Other actions taken in relation to our responsibilities under the Local Audit and Accountability Act 2014	We had no matters to report

Area of Work	Conclusion
Reporting to the National Audit Office (NAO) on our review of the Authority's Whole of Government Accounts return (WGA).	We have not yet completed the work on the WGA Submission. The national deadline is 13 th September 2019

Executive Summary (cont'd)

As a result of the above we have also:

Area of Work	Conclusion
Issued a report to those charged with governance of the PCC communicating significant findings resulting from our audit.	Our Audit Results Report was issued on 12 July 2019
Issued a certificate that we have completed the audit in accordance with the requirements of the Local Audit and Accountability Act 2014 and the National Audit Office's 2015 Code of Audit Practice.	We have not as yet issued our audit completion certificate. We cannot formally conclude the audit and issue an audit certificate until we have completed the work necessary to issue our assurance statement in respect of the PCC's Whole of Government Accounts consolidation pack. We are satisfied that this work does not have a material effect on the financial statements or on our value for money conclusion.

We would like to take this opportunity to thank the Office of the PCC's staff and also the staff of the Chief Constable for their assistance during the course of our work.

Suresh Patel

Associate Partner

For and on behalf of Ernst & Young LLP



02

Purpose and Responsibilities

Purpose and Responsibilities

The Purpose of this Letter

The purpose of this annual audit letter is to communicate to Members and external stakeholders, including members of the public, the key issues arising from our work, which we consider should be brought to the attention of the PCC (Group).

We have already reported the detailed findings from our audit work in our 2018/19 Audit Results Report to the 12 July 2019 Joint Independent Audit Committee. We do not repeat those detailed findings in this letter. The matters reported here are the most significant for the PCC (Group).

Responsibilities of the Appointed Auditor

Our 2018/19 audit work has been undertaken in accordance with the Audit Plan that we issued on 06 Dec 2018 and is conducted in accordance with the National Audit Office's (NAO) 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the NAO.

As auditors we are responsible for:

- ▶ Expressing an opinion:
 - ▶ On the 2018/19 financial statements, including the police pension fund; and
 - ▶ On the consistency of other information published with the financial statements.
- ▶ Forming a conclusion on the arrangements the PCC has to secure economy, efficiency and effectiveness in its use of resources.
- ▶ Reporting by exception:
 - ▶ If the annual governance statement is misleading or not consistent with our understanding of the PCC;
 - ▶ Any significant matters that are in the public interest;
 - ▶ Any written recommendations to the PCC, which should be copied to the Secretary of State; and
 - ▶ If we have discharged our duties and responsibilities as established by the Local Audit and Accountability Act 2014 and Code of Audit Practice.

Alongside our work on the financial statements, we also review and report to the NAO on your Whole of Government Accounts (WGA) return. [The extent of our review and the nature of our report are specified by the NAO.]

Responsibilities of the PCC

The PCC is responsible for preparing and publishing its statement of accounts accompanied by an Annual Governance Statement (AGS). In the AGS, the PCC reports publicly each year on how far it complies with its own code of governance, including how it has monitored and evaluated the effectiveness of its governance arrangements in year, and any changes planned in the coming period.

The PCC is also responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.



03

Financial Statement Audit

Financial Statement Audit

Key Issues

The PCC's Statement of Accounts is an important tool for it to show how it has used public money and how it can demonstrate its financial management and financial health. We audited the PCC's Statement of Accounts in line with the NAO Code, International Standards on Auditing (UK), and other guidance issued by the National Audit Office and issued an unqualified audit report on 31 July 2019. Our detailed findings were reported to the 22 July 2019 Audit Committee.

The key issues identified as part of our audit were as follows:

Issues	Conclusion
Misstatements due to fraud or error	We did not identify any matters to report to the Audit Committee.
Risk of fraud in revenue and expenditure recognition - incorrect classification of revenue expenditure as capital	We did not identify any matters to report to the Audit Committee.
Valuation of land and buildings	In respect of the PCC's £246m land and buildings, we did not identify any issues to report.
Pension liability	The PCC's £4.7bn net pension liability appropriately reflects the impact of national issues arising after the 31 March in respect of legal rulings regarding age discrimination arising from public sector pension scheme transitional arrangements, commonly described as the McCloud ruling. This late change increased the pension liability by £193m.
Implementation of new accounting standards	We did not any matters to report to the Audit Committee.

Financial Statement Audit (cont'd)

Our application of materiality

When establishing our overall audit strategy, we determined a magnitude of uncorrected misstatements that we judged would be material for the financial statements as a whole.

Item	Thresholds applied
Planning materiality	<p>We determined planning materiality to be £10.593 m (2017/18: £10.088 m), for the PCC Group, £10.384 m (2017/18: £9.884 m), for the Chief Constable Single Entity which is 1.8 % of Gross Revenue Expenditure reported in the accounts. For the PCC Single Entity we determined planning materiality to be £6.340 m (2017/18: £6.023 m). For the Police Pension Fund we determined planning materiality to be £1.033 m (2017/18: £0.965 m)</p> <p>We consider Gross Revenue Expenditure to be one of the principal considerations for stakeholders in assessing the financial performance of the PCC Group. For the PCC Single Entity we consider Gross Assets to be one of the principal considerations for stakeholders. This is because of the nature of the funding arrangements in place at the PCC Single Entity and the relative value of Gross Assets. For the Police Pension Fund we consider Benefits Payable to be one of the principal consideration for stakeholders given the scale of benefits payable.</p>
Reporting threshold	We agreed with the Joint Independent Audit Committee that we would report to the Committee all audit differences in excess of 5% of each of the respective materiality levels noted above for each of the respective entities.

We also identified the following areas where misstatement at a level lower than our overall materiality level might influence the reader. For these areas we developed an audit strategy specific to these areas. The areas identified and audit strategy applied include:

- ▶ Remuneration disclosures including any severance payments, exit packages and termination benefits
- ▶ Related party transactions

We evaluate any uncorrected misstatements against both the quantitative measures of materiality discussed above and in light of other relevant qualitative considerations.



04 Value for Money

Value for Money

We are required to consider whether the PCC has put in place 'proper arrangements' to secure economy, efficiency and effectiveness in its use of resources. This is known as our value for money conclusion.

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

- ▶ Take informed decisions;
- ▶ Deploy resources in a sustainable manner; and
- ▶ Work with partners and other third parties.

We identified one significant risk in relation to these arrangements concerning the PCC's involvement in the Tri-Force Enterprise Resource Planning (ERP) system. The ERP implementation programme has experienced significant slippage on the original timetable and incurred additional costs than the original budget.

We performed the procedures outlined in our audit plan and reported details in the Audit Results Report issued to the 12 July Joint Independent Audit Committee.

We did not identify any significant weaknesses in the PCC's arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. As a result we had no matters to report in the auditor's report in respect of value for money.



05 Other Reporting Issues



Other Reporting Issues

Whole of Government Accounts

We are required to perform the procedures specified by the NAO on the accuracy of the consolidation pack prepared by the PCC for Whole of Government Accounts purposes. The national deadline for completion of the Whole of Government Accounts review is 13th September 2019. We have not completed the reviewed as at the date of completion of this report but will report our findings at the next available Joint Independent Audit Committee.

Annual Governance Statement (AGS)

We are required to consider the completeness of disclosures in the PCC's AGS, identify any inconsistencies with the other information of which we are aware from our work, and consider whether it is misleading. We completed this work and did not identify any areas of concern.

Report in the Public Interest & written recommendations

We have a duty under the Local Audit and Accountability Act 2014 to consider whether, in the public interest, to report on any matter that comes to our attention in the course of the audit in order for it to be considered by the PCC or brought to the attention of the public. We also need to consider whether to designate any audit recommendation as one that requires the PCC to consider it at a public meeting and to decide what action to take in response. We had no matters that required us to report in the public interest or make written recommendations.

Objections

We did not receive any formal objections to the 2018/19 financial statements from members of the public.

Other Powers and Duties

We identified no issues during our audit that required us to use our additional powers under the Local Audit and Accountability Act 2014.

Independence

In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning regulatory and professional requirements.

Control Themes and Observations

As part of our work, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. Although our audit was not designed to express an opinion on the effectiveness of internal control, we are required to communicate to you significant deficiencies in internal control identified during our audit. We have adopted a fully substantive audit approach and have therefore not tested the operation of controls. Our audit did not identify any controls issues to bring to the attention of the Joint Independent Audit Committee.



06 Focused on your future



Focused on your future

The Code of Practice on Local Authority Accounting in the United Kingdom introduces the application of new accounting standards in future years. The impact on the PCC is summarised in the table below.

Standard	Issue	Impact
IFRS 16 Leases	<p>It is currently proposed that IFRS 16 will be applicable for local authority accounts from the 2020/21 financial year.</p> <p>Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease a large number of assets the new standard will have a significant impact, with nearly all current leases being included on the balance sheet.</p> <p>There are transitional arrangements within the standard and although the 2020/21 Accounting Code of Practice for Local Authorities has yet to be issued, CIPFA have issued some limited provisional information which begins to clarify what the impact on local authority accounting will be. Whether any accounting statutory overrides will be introduced to mitigate any impact remains an outstanding issue.</p>	<p>Until the 2020/21 Accounting Code is issued and any statutory overrides are confirmed there remains some uncertainty in this area.</p> <p>However, what is clear is that the PCC will need to undertake a detailed exercise to identify all of its leases and capture the relevant information for them. The PCC must therefore ensure that all lease arrangements are fully documented.</p>
IASB Conceptual Framework	<p>The revised IASB Conceptual Framework for Financial Reporting (Conceptual Framework) will be applicable for local authority accounts from the 2019/20 financial year. This introduces;</p> <ul style="list-style-type: none"> - new definitions of assets, liabilities, income and expenses - updates for the inclusion of the recognition process and criteria and new provisions on derecognition - enhanced guidance on accounting measurement bases - enhanced objectives for financial reporting and the qualitative aspects of financial information. <p>The conceptual frameworks is not in itself an accounting standard and as such it cannot be used to override or disapply the requirements of any applicable accounting standards.</p> <p>However, an understanding of concepts and principles can be helpful to preparers of local authority financial statements when considering the treatment of transactions or events where standards do not provide specific guidance, or where a choice of accounting policies is available.</p>	<p>It is not anticipated that this change to the Code will have a material impact on Local Authority financial statements.</p> <p>However, Authorities will need to undertake a review to determine whether current classifications and accounting remains valid under the revised definitions.</p>



07

Audit Fees

Audit Fees

As highlighted in our 12 July 2019 Audit Results Report we are in the process of determining the additional fee in respect of the Significant Risk on the Value for Money Conclusion. Given that this work was undertaken across three Forces we need to understand the total cost jointly and will communicate this with senior officers when complete. We also expect an impact on fee as a result of the additional work undertaken to audit the pension adjustments arising from McCloud and Guaranteed Minimum Pension Equalisation. We will seek to agree any additional fees firstly with the Chief Financial Officer and then seek approval by Public Sector Audit Appointments (Ltd) before being invoiced.

Description	Final Fee 2018/19 £	Planned Fee 2018/19 £	Scale Fee 2018/19 £	Final Fee 2017/18 £
Total Audit Fee PCC - Code work	TBC*	31,214	31,214	40,538
Total Audit Fee CC - Code work	TBC*	14,438	14,438	18,750
Additional Fee - Significant Risks	TBC*	N/A	N/A	N/A
Total Audit Fee	TBC*	45,652	45,652	59,288

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ED None

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Police Sector Audit Committee Briefing

Quarter 3, September 2019



Building a better
working world



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This sector briefing is one of the ways that we support you and your organisation in an environment that is constantly changing and evolving.

It covers issues which may have an impact on your organisation, the Police sector, and the audits that we undertake.

The briefings are produced by our public sector audit specialists within EY's national Government and Public Sector (GPS) team, using our public sector knowledge, and EY's wider expertise across UK and international business.

The briefings bring together not only technical issues relevant to the Police sector but wider matters of potential interest to you and your organisation.

Links to where you can find out more on any of the articles featured can be found at the end of the briefing.

We hope that you find the briefing informative and should this raise any issues that you would like to discuss further please contact your local audit team.



Government and economic news

Spending Review and Tax Reform

A local government think-tank, Local Government Information Unit, has warned the new prime minister has 100 days to save local government finance. Currently local authorities are facing a financial cliff edge because funding for local government beyond 31 March 2020 has not been finalised by central Government. This has hindered the ability of local authorities to effectively budget for the 2020/21 financial year. This may result in decisions being made based on a worst-case scenario such as redundancies, reducing services or selling valuable public assets. The research conducted by the think-tank was based on evidence provided by 254 senior local government figures, and its recommendation are that the new prime minister provides a one-year emergency settlement to enable local authorities to definitively plan for future years.

On the 8 August 2019, the new Chancellor of the Exchequer announced a one-year Spending Review of government departments. Usually Spending Reviews cover three year periods; however, the Chancellor stated that this one-year round will 'clear

the ground' for government departments to focus on Brexit. The County Council's Network chairman-elect has called for the spending review to include emergency injection of resources to help councils plug the funding gap across the sector. The Local Government Association (LGA) has calculated the scale of the funding gap for the 2020/21 financial year to be £5bn, rising to £8bn by 2025.

The Chief executive of the Chartered Institute of Public Finance and Accountancy (CIPFA) commented that the Spending Review period of one year was too short to provide the certainty required for medium term financial planning that is critically required to alleviate the fiscal pressures faced by the sector. Reform of the Business Rates and Council Tax systems are seen as critical to achieving long term financial sustainability with the sector. Research conducted by the Institute for Public Policy reported that today's Council Tax resembles a poll tax that is regressive and inefficient. London Assembly member, Tom Copley, commented that the council tax system is 'out of control' to the extent that

it is unfit for purpose. The research concluded that an official commission should be established to review and encourage a rethink of the Council tax system.

In light of the Spending Review it is now thought unlikely that the fair funding review will be introduced in time to be implemented for the 2020/21 financial year.

Value of PWLB loans rises by 75%

The Public Works Loan Board (PWLB) is responsible for lending money to local authorities, including Police forces, for capital projects at low rates of interest. According to the PWLB's annual report, the value of loans to local authorities has increased by 75% from £5.2bn at 31 March 2018 to £9.1bn at 31 March 2019. The increase was driven not only by the increased value borrowed, but also by an increase in the number of loans.

Over the last seven years the value of these loans has increased by 84% (£3.2bn 2012/13 to £9.1bn 2018/19). This amplified reliance on PWLB compares to central government funding falling by almost 50% since 2010/11.

PWLB borrowing by local authorities



Chart: Dbrady; Source: PWLB annual accounts; Get the data; Created with Datawrapper

Another contributing factor to the increase in PWLB loans is the redemption of Lender Option Borrower Option (LOBO) loans. LOBO loans were popular following the financial crisis and meant that local authorities, including fire and rescue authorities, could take out loans with even lower rates of interest than the PWLB offered. However, lenders could alter the interest rates at certain points in the future. Local authorities, including fire and rescue authorities, refused to pay the higher interest rates and therefore had to pay the loan back in full. These were then replaced with PWLB loans.

Government Launches Independent Review of Prevent

The Policing Minister, Rt Brandon Lewis, announced in August 2019 that there would be an independent review of the government's key strands of counter-terrorism strategy 'Prevent'. Prevent is one of the government's four key strands of counter-terrorism strategy with the over-arching strategy referred to as CONTEST. The purpose of Prevent is to safeguard vulnerable individuals from participating in terrorist activity or supporting terrorism by directly engaging with such individuals to counter-act the threat that exists. A key concept of Prevent is that it focuses on all terrorist threats and so ranges from the threat of Islamist extremists to far right extremists. Individuals identified as being at risk are offered tailored support and advice. Since 2012, 1,267 people have been channelled through Prevent.

Of the referrals made in 2017/18 (394) approximately 44% were referred for concerns relating to far-right extremism and 45% with regards Islamist extremism. In 2018/19, Prevent delivered 203 community-based projects reaching over 142,000 participants, 47% of which were delivered in schools.

Independent review will be overseen by Lord Carlile. Lord Carlile has previously been involved as an independent reviewer of terrorist legislation. The review is aimed at further improving and strengthening Prevent through a series of recommendations that reflect the changing and complex nature of counter-terrorism strategy in the UK. It is hoped that the independent review will conclude in the summer of 2020 with the report scheduled for conclusion in August 2020. The terms of reference will be published shortly.

Prime Minister opens first meeting of the National Policing Board

The Prime Minister, Boris Johnson, opened the first meeting of the National Policing Board (the Board) on 31 July 2019. The Board will meet four times a year and help drive forward the government's commitment to recruit an additional 20,000 police officers in England and Wales over the next three years. The Board brings together senior officers from the police force as well as key members of government. The Board will be a key partnership tool between the government and the police and aims to increase collaboration and efficiency between the 43 Police forces in England and Wales. Speaking at the opening of the meeting, the Prime Minister confirmed his commitment to the 20,000 additional police officers, with recruitment aimed at starting in the coming weeks. The Prime Minister re-stated his commitment to giving the police the resources and the capability to do their jobs.

In attendance from the police sector was the Chair of the National Police Chief's Council, Chair of the Association of Police and Crime Commissioners, the National Crime Agency Director, and also the Metropolitan Police Assistant Commissioner.

Amongst the topics discussed at the meeting were the changing and complex demands on policing and officer wellbeing and how to ensure that this was safeguarded and improved.

Home Secretary announces plans for a police covenant

The Home Secretary, Sajid Javid, announced in July 2019 his intention to introduce a police covenant for the government's recognition of the bravery and commitment of the police. The covenant was envisaged as recognising those currently serving, as well as those who have served.

In addition, the Home Secretary offered his support to the Police Federation who want to extend the same protection and rights to special constables as those of serving officers.

In recognising police officers as holders of 'the office of constable', rather than employees, it is hoped that this will infer upon serving officers a special recognition reflected in a high level of accountability and responsibility for the protection of life and property. As a result of holding such a role, all individuals would in turn be expected to hold the highest levels of personal behaviour and ethics.

A consultation will take place in due course as to the extent and scale of the proposed covenant.

Reacting to the proposal the National Chair of the Police Federation said that this was good news for policing.

The proposed covenant follows the Home Office's Front Line review of policing which looked at ways to protect officer wellbeing as well as reducing workloads and giving them a stronger role in decision making.

Government prioritises mental health and wellbeing of officers in new package to support police

The Home Office has engaged directly with police officers during the last year through a programme known as the Front Line Review and the findings were published in July 2019. The findings summarise the feedback received directly from the front line, alongside a series of measures aimed at addressing some of the issues which emerged from the feedback received. One such option being considered is the requirement for Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to assess wellbeing as part of their annual cycle of inspections.

Other findings and recommendations from the Front Line Review include:

- ▶ Empowering the police to 'push back' where they felt ill equipped to deal with specific scenarios
- ▶ Involving front line officers in aspects of policy making and decision making
- ▶ A commitment to wellbeing and personal and professional development
- ▶ Facilitating greater communication between police chiefs and front line staff in understanding specific sources of frustration

Speaking of the review the then Home Secretary, Sajid Javid, noted that in order for the police to keep society safe, it was crucial that the government did everything possible to ensure the wellbeing of its police officers, including reducing workloads and giving officers a greater say in decision making.

As a result of the review, the government has worked closely with multiple agencies including the College of Policing, National Police Chiefs Council, the Police Federation, HMICFRS, the Association of Police and Crime Commissioners, and others to see what learning can be identified from these findings.



Accounting, auditing and governance

NAO consultation on the Code of Audit Practice: Phase Two

Under the 2014 Local Audit and Accountability Act (the Act), a review of the Code of Audit Practice (the Code) is required every five years. The Code sets out what local auditors are required to do to fulfil their statutory responsibilities under the Act. This encompasses how audits of a local body's financial statements are conducted, including reporting, and also how assurance is gained on a local body's value for money arrangements. The current form of the Code came into force on 1 April 2015, so a revised Code will be required to take effect from 1 April 2020 for the audit of a local body's financial statements for 2020/21.

The National Audit Office (NAO) is responsible for the Code of Audit Practice and has launched phase two of its consultation. The key proposed changes relate to value for money and include:

- ▶ Enhanced auditor reports on the financial statements. The Code includes the potential for audit reports to include more information on risks and key audit matters, mirroring the audit reports for NHS Foundation Trusts and large corporate entities.
- ▶ Separation of reporting on the audit of the financial statements and value for money and removing the conclusion on value for money arrangements. The Code proposes that the auditor will issue the audit report on the financial statements and then by no later than 30 September issue a separate Annual Auditors Report which will include a commentary on value for money.
- ▶ Revised Value for Money criteria, to cover:
 - ▶ Financial Sustainability – how the local authority plans and manages its resources to ensure it can deliver its services
 - ▶ Governance – how the local authority ensures that it makes informed decisions and manages its risks and finances
 - ▶ Improving economy, efficiency and effectiveness – how the local authority uses cost and performance information data to improve service delivery
- ▶ Mandatory procedures for the auditor to carry out an initial review of value for money arrangements. These procedures will enable the auditor to identify any risk based work and also provide a commentary at any emerging issues at a local body.
- ▶ Revised Value for Money reporting, including the timescales of reporting. Where a significant weakness in VFM arrangements are identified, the revised Code will require auditors to issue a recommendation to the body, setting out judgements made and evidence to support those judgements.
- ▶ Expectations on the speed auditors take on responding to formal objections to a local authority's accounts.

The consultation recognises that the proposed changes will likely alter the work needed to be done by auditors, the resources and skills auditors need to deploy and therefore possibly the fees required to fund the work.

External auditors provide independent assurance that local bodies are properly accounting for spending and that adequate value for money arrangements are in place to manage their affairs. This review of the Code is a valuable opportunity to shape the future of local authority audit. This Second Phase of the NAO's consultation of the Code is open until 22 November 2019. For more information on how to contribute to the NAO's Code consultation refer to the NAO website.

EY will be contributing to this consultation and playing its part to help shape the future sustainability of public sector audit. We believe the NAO has a critical role to lead and shape the future of local audit and through that role help to secure the future sustainability of the public audit profession. The Code and supporting auditor guidance notes present a significant opportunity to reform local public audit. We also recognise that the consultation comes at a time of significant scrutiny of the UK audit market and profession. We believe it is crucial that the Code is closely aligned with the outcome from various reviews.

PSAA records rise in delayed audit opinions

Public Sector Audit Appointments Limited (PSAA) has released information that 40% of local authorities under its remit did not receive audit opinions on their 2018/19 accounts by 31 July. This is an increase of 27% in comparison to the prior year.

PSAA acknowledge a number of factors have led to the deterioration in performance, posing challenges for both auditors and local authorities across the country. They have called for the issues to be worked through and solutions implemented which will ensure a sustainable supply of audit services in the long term.





Regulation news

Independent Audit Quality Review

On 10 July 2019, at the CIPFA annual conference, the Communities Secretary, Rt Hon James Brokenshire MP, announced the launch of an independent review of the quality of local authority audits. This review will examine the effectiveness of the local authority financial reporting and audit regime, including whether auditors are using their reporting powers correctly and if local authorities are appropriately responding to recommendations raised. The review will also look at the expectation gap between what taxpayers believe an audit delivers and what is actually delivered.

The Communities Secretary stated "A robust local audit system is absolutely pivotal to work on oversight, not just because it reinforces confidence in financial reporting but also service delivery and, ultimately, our faith in local democracy."

Sir Tony Redmond, former President of CIPFA, will lead the review. Representatives from EY will be contributing to the review in October. We expect initial recommendations to the Communities Secretary in December 2019, with a final report published in March 2020.

The review of external audit and financial reporting follows the implementation of the Local Audit and Accountability Act 2014, which abolished the Audit Commission and put in place a new localised audit regime in order to improve transparency. This

review will meet the Ministry of Housing, Communities and Local Government's commitment to undertake a post implementation review of the revised audit regime framework.

'Profound and far reaching police reform urgently needed' says Chief Inspector of Constabulary

In his latest annual assessment of policing in England and Wales the Chief Inspector of Constabulary, Sir Thomas Winsor, has concluded that though the police continue to act with integrity and bravery, profound and far reaching, police reforms are urgently needed. The assessment from HMICFRS ultimately concludes that the majority of police forces continue to perform well.

The findings are presented in the HMICFRS Report: 'State of Policing: The Annual Assessment of Policing in England and Wales 2018'.

The report concludes on a number of broad themes:

1. Despite the array of challenges currently facing police forces, the majority of forces continue to perform well. Forces, and indeed officers, continue to act with bravery and integrity, often in the face of the increasing complexity and range of challenges that they currently face.
2. The current criminal justice system in which the police operate is dysfunctional and defective. The report specifically focuses on the impact of this on children, and the most vulnerable in society, which it says are let down by the current criminal justice system. Often there is a cycle of intervention which fails to ultimately tackle prevention.
3. There is currently an expectation gap between police funding and the expectation of the public. The report focuses on two specific aspects of police funding: one is that the funding is too focused on the short-term and the second is that the funding is not tailored in any way to the unique circumstances of local forces. The biggest issue, however, is the widening expectation between what the public perceives and the ability of the police to be able to deliver those expectations.
4. The last theme developed and explored in the report is the need to reform national, local and regional arrangements to better encourage co-operation and intelligence sharing across the boundaries and between the 43 police forces in England and Wales. At present the current system is seen as a barrier preventing effective and efficient policing. The report argues that there is an increasing call for compulsory reform if the current model/s cannot voluntarily reform themselves in the required manner.

In addition to commenting on the general broad themes the report also touches on an update to some of the specifics of HMICFRS Inspections for 2018/19. The Police effectiveness, efficiency and legitimacy Inspection programme (PEEL) is currently in its fourth year and enables HMICFRS to publish its thematic reports such as the State of Policing and more focused local inspections. The changes are referred to as Integrated Performance Assessments (IPA). Some of the key changes as a result of IPA are:

- ▶ A single set of questions that covers all 3 PEEL pillars
- ▶ Just one period of fieldwork in the IPA assessment period
- ▶ For most forces fewer days of fieldwork inspections
- ▶ Extra evidence and an increased focus on Force Management Statements to help drive better and more focused inspections and assessments

Key Questions for the Audit Committee

Spending Review and Tax Reform

What is the size of your Force's funding gap in the medium term? What processes does your Force have in place to address its funding gap?

As members how do you provide effective oversight and governance of these processes?

Home Secretary Announces Plans for a Police Covenant

Has your Force had any direct input into the Front Line Review and what do you see as the opportunities and challenges arising from the Front Line Review?

Government prioritises mental health and wellbeing of officers in new package to support police

What impact would the increase in police numbers have on your local policing strategy and are you clear on the key priorities for your local force?

NAO consultation on the Code of Audit Practice

Will your Police force contribute to Phase Two of the consultation conducted by the NAO?

PSAA records rise in delayed audit opinions

Did your Police force make the publication deadline? Does your finance team have the appropriate resources to ensure financial accounts and working papers are prepared to a high enough standard?

Profound and far reaching police reform urgently needed' says Chief Inspector of Constabulary

What learning is there for your Force from the 'State of Policing 2018 Assessment'?

Find out more

Spending Review and Tax Reform

<https://www.publicfinance.co.uk/news/2019/07/new-pm-given-stark-warning-over-future-local-councils>

<https://www.publicfinance.co.uk/news/2019/08/councils-call-spending-review-plug-their-funding-black-hole>

Value of PWLB loans rises by 75%

<https://www.publicfinance.co.uk/news/2019/07/pwlb-loans-shoot-751>

Independent Review of PREVENT announced

<https://www.gov.uk/government/news/lord-carlile-to-lead-independent-review-of-prevent>

National Policing Board

<https://www.gov.uk/government/news/prime-minister-opens-first-meeting-of-national-policing-board>

Police Covenant

<https://www.gov.uk/government/news/home-secretary-announces-plans-for-a-police-covenant>

Front Line Review

<https://www.gov.uk/government/news/government-prioritises-wellbeing-and-mental-health-of-officers-in-new-package-to-support-police>

NAO consultation on the Code of Audit Practice

<https://www.nao.org.uk/code-audit-practice/code-of-audit-practice-consultation/>

<https://www.nao.org.uk/code-audit-practice/wp-content/uploads/sites/29/2019/03/Local-audit-in-England-Code-of-Audit-Practice-Consultation.pdf>

PSAA records rise in delayed audit opinions

<https://www.publicfinance.co.uk/news/2019/08/psaa-records-dramatic-rise-delayed-audit-opinions>

<https://www.publicfinance.co.uk/news/2019/07/brookshire-reveals-independent-probe-local-government-audit>

Independent Audit Quality Review

<https://www.gov.uk/government/news/audit-quality-of-councils-will-face-examination-in-new-independent-review>

'Profound and far reaching change'

<https://www.justiceinspectorates.gov.uk/hmicfrs/publications/state-of-policing-the-annual-assessment-of-policing-in-england-and-wales-2018/#download>

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ED None

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JOINT INDEPENDENT AUDIT COMMITTEE



Report for Information

Title: Progress on 2019/20 Joint Internal Audit Plan delivery and summary of matters arising from completed audits

Executive Summary:

The report provides details on the progress made in delivering the 2019/20 Joint Internal Audit Plan and on the findings arising from the audits that have been completed.

Recommendation:

The Committee is requested to note the progress and any changes in delivering the 2019/20 Joint Internal Audit Plan and audit service for Thames Valley Police (TVP) and the Office of the Police and Crime Commissioner (OPCC).

Chairman of the Joint Independent Audit Committee

I hereby approve the recommendation above.

Signature

Date

PART 1 – NON-CONFIDENTIAL

1 Introduction and Background

- 1.1 The report provides details on the progress made in delivering the 2019/20 Joint Internal Audit Plan for TVP and the OPCC and any findings arising from the audits that have been completed.

2 Issues for Consideration

Audit Resources

- 2.1 There have been no changes to the Joint Internal Audit Team's resource plan for 2019/20, with the plan being delivered by the Chief Internal Auditor, Principal Auditor and TIAA Ltd (ICT audit provider).

2019/20 Audit Plan Status and Changes

- 2.2 The progress made in delivering the 2019/20 Joint Internal Audit Plan, as at the 23 September 2019, is detailed in Appendix A.
- 2.3 The following changes have been made to the 2019/20 Joint Internal Audit Plan since the previous JIAC meeting in July:
- An audit of the OPCC's Victims Counselling Service Payment Process has been included.
 - The only other changes have been some minor audit title updates and day allocation alterations.

2019/20 Completed Audits

- 2.4 Appendix B contains the details of each completed audit since the previous JIAC meeting on the 12 July 2019. The appendix contains details on the scope, assurance rating and key findings. Since the previous meeting and as at 23 September 2019, the following audits have been completed:
- Fraud Investigation and Response – reasonable assurance.
 - Resourcing and Resilience – reasonable assurance.
 - Victims Counselling Service Payment Process – minimal assurance.
- 2.5 Copies of Section 2 (Executive Summary) of the final reports have been circulated to the JIAC members, in advance of the meeting.

2019/20 Performance Indicators

- 2.6 Local performance indicators are used by the section to ensure audits are completed promptly and to an acceptable standard. The table below summarises current performance against each indicator.

Ref.	Performance Indicator	Measurement and Target	Current Status	R/A/G
1	Testing Phase: Days between testing start date and file review.	4 x the agreed audit day allocation (original or revised). Green: 100-85% Amber: 70-84% Red: >69%	100% (5 / 5)	↑
2	Reporting Phase: Days between Exit Meeting / Findings and Risk Exposure Summary and the Final Report.	40 days. Green: 100-85% Amber: 70-84% Red: >69%	100% (3 / 3)	↑
3	Audit reviews completed within the agreed audit day allocation.	Each audit day allocation (original or revised). Green: 100-85% Amber: 70-84% Red: >69%	100% (3 / 3)	↔
4	Joint Internal Audit Plan delivered.	Each audit review completed, excluding any agreed changes (i.e. removed audits). Green: 100% Amber: 90-99% Red: >89%	Year-end reporting	N/A
5	Annual Internal Audit Quality Questionnaire outcome.	Responses who strongly or tended to agree with the statements. Green: 100-95% Amber: 85-94% Red: >84%	Year-end reporting	N/A

2.7 The detail to support the current performance levels are:

- All three operational audit performance indicators are at 100% delivery (i.e. testing phase, reporting phase and completed within day allocation).
- The remaining two performance indicators will be reported at year end.

PSIAS Update

2.8 The Joint Internal Audit team's Public Sector Internal Audit Standards (PSIAS) self-assessment was reviewed and updated in April 2019. Following this exercise, a 2019/20 Quality Assurance and Improvement Programme (QAIP) Action Plan was collated. The QAIP Action Plan does not detail any areas that require addressing, but lists the two areas where the risk of partial compliance has been accepted. These areas are:

- Work programmes must be approved prior to their implementation and any adjustments approved promptly (Performance Standard 2240.A1). Quality reviews are undertaken on the Audit Planning document, Draft and Final Audit Briefs.

- The Chief Audit Executive (i.e. Chief Internal Auditor) has defined the skills and competencies for each level of auditor, as well as periodically assessing individual auditors against the predetermined skills and competencies (CIPFA LGAN - Attribute Standards 1230). The team have up to date Job Descriptions, the annual appraisal process and maintain their IIA Continuing Professional Education (CPE) record that identifies core audit competencies.

Fraud

- 2.9 Work on the 2018/19 NFI exercise is ongoing. The data matches have been received and work is progressing to review the information. As at September 2019, no issues have been identified in reviewing the available NFI matches.
- 2.10 The Joint Internal Audit Team have liaised with the Professional Standards Department (PSD) and Corporate Finance and there have not been any instances of fraud that have needed to be notified to the team since the previous JIAC meeting in July.

3 Financial comments

- 3.1 The Joint Internal Audit Plan can be delivered within existing budgetary provisions.

4 Legal comments

- 4.1 No known legal issues arise from the contents of this report.

5 Equality comments

- 5.1 No known equality issues arise from the contents of this report.

6 Background papers

- 6.1 Internal Audit Strategy and Annual Plan 2019/20.

Public access to information

Information in this form is subject to the Freedom of Information Act 2000 (FOIA) and other legislation. Part 1 of this form will be made available on the website as soon as practicable after approval. Any facts and advice that should not be automatically available on request should not be included in Part 1 but instead on a separate Part 2 form. Deferment of publication is only applicable where release before that date would compromise the implementation of the decision being approved.

Is the publication of this form to be deferred? No

Is there a Part 2 form? No

Name & Role	Officer
Head of Unit This report provides the Committee with management information on the progress of delivery of the 2019/20 Joint Internal Audit Plan. This report has been produced in compliance with United Kingdom Public Sector Internal Audit Standards (PSIAS).	Chief Internal Auditor
Legal Advice No known legal issues arise from the contents of this report.	PCC Governance Manager
Financial Advice	

No known financial issues arise from the contents of this report.	PCC Chief Finance Officer
Equalities and Diversity No known equality issues arise from the contents of this report.	Chief Internal Auditor

OFFICER'S APPROVAL

We have been consulted about the proposal and confirm that financial and legal advice have been taken into account in the preparation of this report.

We are satisfied that this is an appropriate request to be submitted to the Joint Independent Audit Committee.

PCC Chief Finance Officer (OPCC)

Date: 23 September 2019

Director of Finance (TVP)

Date: September 2019

APPENDIX A

2019/20 Joint Internal Audit Plan – Current Status (September 2019)

Audit Review	Area	To Start	Scoping	Fieldwork / Ongoing	Exit Meeting	Draft Report	Final Report / Complete	Removed
Body Worn Video	Crime and Criminal Justice	✓						
CCTV				✓				
Released Under Investigation		✓						
Fraud Investigation and Response							Reasonable	
MASH Processes			✓					
Modern Slavery Framework and Governance						✓		
Force Project Lessons Learnt and Benefit Realisation Follow Up	Deputy Chief Constable			✓				
Forward Maintenance Register Delivery		✓						
Telematics Information and Reporting				✓				
Vetting						✓		
Key Financial Controls	Finance		✓					
GDPR Compliance	Information	✓						
ICT Collaboration				✓				
Organised Crime Groups (Part 1)	Local Policing			✓				
Organised Crime Groups (Part 2)		✓						
Resourcing and Resilience							Reasonable	
Terrorism		✓						
CMP Benefits Realisation	Operations	✓						
Force Training Need	People		✓					
SEROCU ICT Services and Functions	Regional Crime and Counter Terrorism		✓					
OPCC Key Governance Controls	Chief Executive Officer			✓				
OPCC Statutory Functions		✓						
Victims Counselling Service Payment Process							Minimal	
Sources of Assurance	N/A			✓				
Number of Audits		8	4	7	0	2	3	0
% of Audits		33%	17%	29%	0%	8%	13%	0%
JIAC Days	Other	Yet to be commissioned.						

APPENDIX B

2019/20 Joint Internal Audit Plan - Completed Audits

Below are the audits that have been complete since the previous JIAC meeting. The key to the assurance ratings is:

Substantial	The governance, risk management and control arrangements are strong, although some minor action may be required to improve efficiency or effectiveness.
Reasonable	The governance, risk management and control arrangements are good, although some action is required to improve efficiency or effectiveness.
Limited	The governance, risk management and control arrangements are limited and action is required to improve efficiency or effectiveness.
Minimal	The governance, risk management and control arrangements are weak and significant action is required to improve efficiency or effectiveness.

Audit Review	Fraud Investigation and Response	Force CCMT Lead	ACC Tim De Meyer
Scope	Internal and External Review Improvements.	Reasonable	Planned Days 12 days
	Force Wide Arrangements, Roles and Responsibilities.	Reasonable	
	Governance and Reporting.	Reasonable	Actual Days 12 days
Overall Assurance		Reasonable	

The key issues arising from the audit are as follows:

- In April 2019, HMICFRS issued a “Fraud Time to Choose - An inspection of the police response to fraud” report, which included several areas that required addressing. Towards the end of the audit, a CCMT report was presented which provided a summary on TVP’s arrangements and further actions. However, the report did not specifically cover recommendation 2, although it was confirmed during the audit that the whole HMICFRS report would be reviewed and considered.
- FISO’s Criminal Finance Strategy for TVP is yet to be finalised and approved.
- The methodology for monitoring delivery of the 2019/20 Force Delivery Plan priority to “Develop and embed our response to vulnerable victims of fraud” was yet to be finalised.
- Work to address the considerations raised as part of the October 2018 Force Performance Risk meeting for Fraud and Cyber Fraud was ongoing. Testing also found a lack of a governance forum within FISO / ECU for monitoring progress and fraud in general.
- As part of the audit, a sample of fraud referrals were reviewed to ensure that they had followed the correct process and were being actioned. Testing found individual cases of missing Stats Classifications, National Fraud Reporting Centre (NFRC) number and National Fraud Intelligence Bureau (NFIB) number. In three cases the “ECU1 – Safeguarding Against Fraud Risk Assessment” form had not been completed and in one case, the Fraud Matrix had not been completed. In two Victim Care cases, although assurances were obtained that the necessary action had been taken, the Niche record lacked sufficient detail to document the safeguarding action applied.
- There is a mandatory Banking Protocol (LDO122) e-learning training course. The current Force wide completion rate is 60%. This issue of fraud training was also raised as part of the Force Performance Risk Meeting - Fraud and Cyber Fraud with a suggestion of “Further compulsory fraud training”. Work to address this is ongoing.
- Although mainly up to date, there were sections of the ECU’s Knowzone page that required reviewing and updating.

- The Action Fraud SOP (dated 15 November 2012) is currently under review and a revised version would be published shortly.
- The Fraud Investigation Model (FIM) is a framework which LPAs should follow when undertaking fraud investigations. The FCST conduct training and awareness sessions on the model. As part of the audit, a sample of five LPAs were contacted to determine whether they were aware of the model. Four of the LPAs commented that they were unaware of the model and had not received any training. The ECU / FCST are planning on delivering more training across the Force later this year.
- The audit discussed the Force's overall strategic approach and prioritisation process for dealing with fraud referrals. In response to HMICFRS's Fraud report, the ECU are currently in the process of writing an overarching fraud policy which will include Terms of Reference, priorities and the new filing rationale.
- The role of the Force Intelligence Hub (FIB) and the working relationship with ECU / FCST in relation to fraud has been identified by management as requiring improvement and these discussions are ongoing.
- Positive assurances were obtained that any fraud issues highlighted by recent LPA Service Improvement Reviews (SIRs) were being addressed. The review queried whether the ECU / FCST are made aware of the fraud issues arising from the SIRs. It was commented that they are not formally notified, but often at the Fraud Surgeries, issues are raised that came out of the SIRs.
- Victims of fraud are referred to the OPCC's Victims First Hub. Ongoing dialogue and discussions take place and training has also been provided to Victims First staff, but it was commented that more could be done in developing the relationship, discussing issues and identifying learning with the hub.

Audit Review	Resourcing and Resilience		Force CCMT Lead	T/ACC Chris Ward ACO Steven Chase
Scope	Officer and Staff Recruitment	Reasonable	Planned Days	12 days
	Retention and Management of Leavers	Reasonable		
	Deployable Resources and Available Skills	Reasonable	Actual Days	12 days
Overall Assurance		Reasonable		

The key issues arising from the audit are as follows:

- Implementing the actions from the 2018 Recruitment Service Improvement Review (SIR) was ongoing, but yet to be completed.
- Promotion and awareness raising activity of the end to end recruitment process was being arranged, but yet to be undertaken.
- People Services are currently designing a regular process to obtain feedback on the recruitment process from hiring managers.
- Towards the end of the audit, a Think Tank meeting took place to discuss retention issues and potential solutions. The meeting identified four main areas where improvements could be made. Although it is positive to see that the area of retention is being considered and discussed, the work to improve this area has only recently commenced.
- The Recruitment and Retention Programme Board have received analysis of recent exit questionnaires. The outcome of the analysis concluded that work needed to be done to improve the effectiveness of the process.
- People Services maintain a number of spreadsheets to oversee and manage LPA and Department resourcing and resilience. Testing found for Oxford LPA, there were inconsistencies with certain figures, resulting from an error with the spreadsheet formulas. These were addressed during the audit. There is a monthly check of the spreadsheets in advance of the Tier 1 Resourcing and Resilience meeting, but this check had not identified these anomalies.
- Observations on the LPA Resourcing and Resilience meetings were raised, including the availability of minutes or agendas for the meetings, inconsistency of information presented between the data produced from Peoplesoft, Duties Management System (DMS) and separate / locally managed spreadsheets and the effectiveness of the meetings in supporting the LPAs to address their local issues.
- Force Intelligence and Specialist Operations (FISO) and the Joint Operations Unit (JOU) do not currently have resourcing and resilience meetings. This is currently being addressed by People Services.

Audit Review	Victims Counselling Service Payment Process		OPCC SOG Lead	Paul Hammond Shona Morrison
Scope	Invoice Receipt and Payment System	Minimal	Planned Days	10 days
			Actual Days	10 days
Overall Assurance		Minimal		

In May 2017, a Victims Counselling Hub Design final report was issued. Although the audit opinion was Reasonable assurance, this was based on progress to date to design effective processes. A number of actions were agreed to ensure a robust control system was in place which related to the following areas:

- Service Documentation, Guidance and Policies.
- Apricot System Content.
- Service Referral Approvals.
- Service Continuity.
- Service Value for Money.
- Purchase Order and Payment Process.
- Grant Awards (Year-End Reports).
- Budget Monitoring.
- Individual Case Performance Monitoring.
- Service Performance Indicators and Monitoring.

These actions have previously been followed up as part of the Joint Independent Audit Committee reporting process. Through this process, it had confirmed that all actions were implemented and robust control processes were in place. However, this latest review was commissioned on the back of concerns raised with regard to certain Counsellor payments and the general system for controlling and paying for Counsellor sessions.

General Victims Counselling Service Payment Process

The issues identified as part of testing the general victims counselling service payment processes are:

- A number of Counsellors who have been paid under different names, predominantly due to the historical process of paying invoices via the OPCC's Bankline system.
- As noted above, the historical system for paying Counsellors via Bankline (NatWest Bank online banking system) had the potential for duplicate payments to be made. Testing of a sample of invoices matched by Counsellor, value and date did not identify any duplicate payments by invoice total. However, it was commented during the review that duplicate payments have previously been identified.
- A number of Counsellors have been paid for providing a service but do not appear to be set up on the Apricot case management system and have not been through the authorised appointment process.
- There was a lack of a full complement of signed or available Counsellor Consultancy Agreements, to confirm Counsellor's acceptance to the terms and conditions in providing the counselling service for the OPCC.
- When a client is referred to a Counsellor, there is an "implied" initial six sessions for each Counsellor detailed within the Consultancy Agreement. However, there

is a lack of clarity on the exact number of sessions being commissioned, focussing more on the need to submit Progress Reports within the initial six sessions.

- The standard rate for counselling sessions is £40 for one hour. During the review, a number of sessions were noted as being 1.5 or 2 hours. Additionally, other sessions had been charged at £45, £50, £60 or £100 per hour. It was commented that approval for these variations would have been captured within the Counselling Hub e-mail inbox, but not within Apricot.
- One of the key controls in the commissioning process is the tracking of sessions, for example; sessions commissioned (initial commitment or additions), sessions completed and invoiced / paid and remaining commitment. The review aimed to establish the tracking process, but it was confirmed that a formal system is not in place.
- In reviewing a sample of Counsellor invoices, it was noted that certain Counsellors were charging for the following; extensions, intakes, planning / assessment, DNA (Did Not Attend) and cancelled. The review was unable to establish a formal and consistently applied policy for these examples. The review also noted that there is no cap on the total number of sessions that could be delivered.
- Another key control in monitoring service delivery is the Counsellor Progress Reports. The Progress Reports predominantly address the need for extra sessions, but they also cover progress to date with the client. It was commented during the review that Progress Reports were required whenever extensions were needed or requested. However, the review found that there was no regular system for receiving the reports.
- As part of the review, the format and content of a sample number of Counsellor invoices were reviewed. Testing identified a number of errors and discrepancies in the process, for example: the frequency of invoicing varied; a range of invoice formats were being used; most invoices did not detail session dates or individual session numbers; a number of invoices did not list client IDs; a number of invoices had hand written client IDs noted; for one invoice the total value was incorrect; invoices being signed off three, four, five and 11 months after the invoice date; one invoice had a hand written bank account change noted; some invoices had financial values changed manually by members of the Policy & Commissioning (P&C) Team; Counsellor invoices were not sequential and duplicate invoice numbers were being used; and a number of invoices have been completed inconsistently or incorrectly by Counsellors (for example incorrect quantities, increasing values of sessions listed, quantities and values not matching, etc.). There was evidence of P&C Team staff members changing and querying certain invoices, but some errors had been missed.
- The audit was also unable to identify a regular system in place to cross check invoice content to Progress Reports.
- There was a lack of a tracking process for sessions commissioned, which includes additional sessions.
- The budget for the Victims Counselling Service is provided by the external Ministry of Justice (MoJ) grant. Service costs are included within the grant returns. However, due to the lack of any session tracking process, as well as any regular budget monitoring, there is a risk that the service could overspend should there be a sudden increase in demand.
- One further key control within the service is client feedback. To date, there has been a lack of a regular or formal process for obtaining client feedback to establish whether the service being provided is meeting the client's needs and, generally, the number of sessions being charged to the OPCC is correct.

Counsellor X Payments and Progress Reports

The audit was specifically asked to review the payments made to Counsellor X. The issues identified as part of testing the Counsellor X payments and general service delivery are:

- Testing found that 20 invoices have been paid between March 2018 and February 2019, totalling £24,200. Analysis of the invoices identified similar issues to those noted above, for example: no session dates; invoices with manually inserted client IDs, as altered by a member of the P&C Team; for one invoice the total value was incorrect (19 sessions were listed, but 21 were paid for (i.e. £840)); 1.5 and 2 hour sessions had been charged for; visits conducted at schools and the John Radcliffe Hospital; intake and planning sessions have been charged for; and sessions charged at £50 or £60 per session.
- In addition to the invoice content testing, the accuracy of the client sessions charged was also reviewed. Testing aimed to establish whether the number of sessions invoiced for each of the clients allocated to Counsellor X was correct. Testing found that between March 2018 and February 2019, Counsellor X had

been allocated 50 clients, delivering a total of 590 sessions. Analysis of the invoice details identified 29 clients where potential duplicate sessions had been invoiced, totalling 109 individual sessions. At £40 per session, this totals a potential overpayment of £4,360. This figure however, does assume that all those sessions that cannot be clearly identified as a duplicate session were legitimate, which may or may not be the case. Due to a lack of any tracking process of sessions commissioned (initial commitment), sessions completed and invoiced / paid and remaining commitment, the issues with Counsellor X's invoices went undetected for 12 months.

- One further test was conducted on a sample of five Counsellor X clients aimed at establishing whether Progress Reports were being regularly received and there was visibility of the sessions being delivered, any additional sessions required and progress in supporting the client. Testing found that in general, Progress Reports were not being received.

Disclaimer: Any matters arising as a result of the audits are only those which have been identified during the course of the work undertaken and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that could be made. It is emphasised that the responsibility for the maintenance of a sound system of management control rests with management and that the work performed by the Joint Internal Audit Team on the internal control system should not be relied upon to identify all system weaknesses that may exist. However, audit procedures are designed so that any material weaknesses in management control have a reasonable chance of discovery. Effective implementation of management actions is important for the maintenance of a reliable management control system.

