

Joint Audit Committee 26th March 2020

Comments/Questions

General Queries

Ref	Raised by		Management response
1	Sue Davis	In light of the postponement of the commissioner elections, how will full and stable membership of the Audit Committee for the next 12 months be ensured?	<p><b><u>Response from J Jardine (OPCC)</u></b></p> <p>The Strategic Policing and Crime Board (SPCB), from which some members of Joint Audit Committee are drawn, will continue through the 2020-21 civic year. The OPCC is proposing that SPCB members Brendan Connor, Cath Hannon and Gurinder Josan are members of JAC during this period. Should the membership of SPCB / JAC change, there is a further SPCB member who could become a JAC member. Recruitment of a further independent member of JAC is complete.</p>
2	Sue Davis	Since the current lockdown is expected to last for three months, what arrangements are being made to enable remote meetings to take place to enable JAC to still function?	<p><b><u>Response from J Jardine (OPCC)</u></b></p> <p>The OPCC has already conducted an SPCB public meeting via the "Zoom" online platform livestreamed to YouTube which could be used for a public JAC meeting. The OPCC is currently reviewing other online meeting platforms and will support JAC to meet publicly via these mechanisms. The Force's access to the Skype for Business platform allows consideration of Official-Sensitive content with JAC members.</p>
3	Sue Davis	There is a risk added for impact of covid-19 on police numbers, but what proportion of all other work is capable of being done remotely?	<p><b><u>Response from DCC Rolfe (WMP)</u></b></p> <p>In short, a significant proportion of other work can be done remotely, however, not all our 10600 employees have laptops. Some functions, i.e. those on secret systems or requiring particular software are fixed desk. In terms of proportions we have over 1200 officers in Response teams, over 600 in Neighbourhood Policing &amp; over 1000 staff in call handling. This cannot be done remotely but we are working hard to support staff</p>

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			<p>with social distancing &amp; PPE. Many of our enabling functions can work remotely (the whole finance function is working remotely). We have issued more than 2000 additional laptops in the last 2 weeks prioritising essential functions needed to keep the business running. For some staff in front line roles but self-isolating like Response Officers, we have issued mira books which connect to their mobile device &amp; have laptop functionality but the processor is in the mobile device. They are working through logs that can be resolved over the telephone etc. All meetings are now held over Skype. The impact on policing is not just that our staff are affected, we additionally have a lead role in the major incident response, chairing the Strategic Co-ordination Group of category 1 &amp; 2 responders (emergency services, local authorities, NHS &amp; Public Health). We have therefore rationalised some of our transformation work that will not progress as it is reliant on suppliers &amp; re-focused some areas of business to support this major incident response.</p> <p><b><u>Response from Mark Kenyon (OPCC)</u></b> All staff in the OPCC can work remotely and where appropriate are adjusting their work plans to continue to work effectively over the lockdown period.</p>
4	Sue Davis	Have staff other than uniformed staff been designated key workers?	<p><b><u>Response from DCC Rolfe</u></b> All police employees are classed as key workers.</p>
5	Sue Davis	What arrangements are in place to support staff through long periods of isolation?	<p><b><u>Response from DCC Rolfe (WMP)</u></b> Our People &amp; Organisational Development Team have pulled together a comprehensive support package ranging from those needing to work differently &amp; have less human contact to those repeatedly exposed to trauma, for example supporting the new mortuary arrangements with the Coroner. This is all accessible on our intranet &amp; daily bulletins go to staff and managers.</p> <p><b><u>Response from Jonathan Jardine (OPCC)</u></b> OPCC staff can access WMP resources. In addition, the OPCC has set up virtual team meetings and other channels to ensure staff are supported.</p>

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6	Sue Davis	What are the implications for the delivery of the audit plan and annual audit? Have reporting dates been set back?	<p><b>Response from Lynn Joyce</b></p> <p>At the time the plan was discussed and agreed with Senior Management we couldn't have planned for the significant fast paced changes that have occurred over the past few weeks. A vast amount of the OPCC and WMP workforce are now working from home so Internal Audit have had to change the way we work significantly, relying on technology more than ever. This, coupled with force priorities dealing with the crisis, has slightly delayed the conclusion of some of the 2019/20 audits, but we are continuing to work on these and will bring them to a conclusion as soon as possible. I will still be in a position to provide an annual assurance opinion 2019/20.</p> <p>I anticipate there will be a need to refocus the 2021/22 plan based on future discussions with Senior Management, with JAC approving any changes. Internal Audit are continuing to plan for next year's audits and we will progress these as far as possible using what existing access to systems we have and utilising skype etc. I do anticipate some delays in availability and operational priorities preventing progress in some areas, which we will work around as much as possible.</p>

### Queries Comments on specific agenda items

Ref	Raised by	Comment/Question	Management response
Minutes: Minute 411/Item 5	Richard Hollands	There's a decision to replace a planned GDPR audit with a cyber security review which I understand and support. As these two reviews are likely to be looking at different things (and the GDPR work isn't necessarily a technical piece of work), is there an intention to cover GDPR at a later date? I have seen in my own experience that the work organisations did in 2018 to be 'GDPR-ready' is only one aspect of this area and assurance on ongoing compliance with GDPR is still an important area?	<p><b>Response from Lynn Joyce</b></p> <p>This change was requested by the Chief Constable as cyber security risk is high on the national agenda and there was ongoing oversight of GDPR. A GDPR readiness review was undertaken in of the OPC and WMP in Oct/Nov 2018. The Force audit was also supplemented by a review from the Information Commissioners Office (ICO). A series of recommendations have been made by Internal Audit and the ICO, both of which are being monitored. Any outstanding audit recommendations are reported to JAC.</p>

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			<p>Whilst an overarching GDPR compliance review was cancelled, GDPR aspects are still being reviewed in other audits, although the main focus is not GDPR, for example, the recent review of safeguarding boards considered information sharing arrangements, the 2020/21 planned audit of Commissioning will consider the organisations role as a data controller or data processor.</p> <p>In addition, Internal Audit sit on both the Information Assurance Working Group and the Strategic Information Management Board where GDPR and wider information management issues are discussed and monitored.</p>
Minute 414/Item 8	Richard Hollands	<p><i>“The Chair asked Jonathan Jardine to advise on how risk will be managed within the Force moving forward as the previous risk manager has now left.</i></p> <p><i>- Jonathan Jardine responded that he will take this away and come back to the committee</i></p> <p><i>The Chair added that the committee would be grateful to know that someone has responsibility for managing risk.”</i></p> <p>Is there any update on this, please, as the attached papers (Item 8 on the agenda) don't refer to this issue?</p>	<p><b><u>Response from DCC Rolfe</u></b></p> <p>The post remains vacant but the Chief Constable's Staff Office &amp; Strategy &amp; Direction Team are ensuring an oversight of risk. The interim named individual is the Chief Constable's Chief of Staff, Emma Smuts-Muller.</p> <p>The post will be filled ASAP.</p>
Minute 417/Item 11	Richard Hollands	<p>Have the issues with external audit provision been resolved? I do note that the challenges of having enough available auditors is described in later papers and that this was also part of an email that Mark Kenyon shared with us a few weeks back. This minute also highlights some concerns around quality – is the senior team confident that the external auditor's proposed plans of work will ensure that we don't experience a repeat of last year's issues?</p>	<p><b><u>Response from Mark Kenyon</u></b></p> <p>Both CFO's for the Force and PCC have had meetings with Grant Thornton (GT) about their ability to deliver the external audit services to the required quality and timescales. We have had assurances from that they can deliver. This will be monitored through the year through progress meetings with Grant Thornton.</p> <p>COVID-19 changes the position in terms of audit deadlines for the external audit of the Statement of Accounts in 2019/20 and the accounting requirements through CIPFA simplifying the reporting requirements for 2019/20.</p>
Main agenda items			

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Item 8	Richard Hollands	<p>The risks relating to PEQF/recruitment activity indicate that a failure to hit recruitment targets may affect future Home Office funding. Do we know if this is likely to be enforced if the targets aren't met due to (understandable) disruptions to our work in this area and on routine operations generally in light of the coronavirus epidemic?</p> <p>Does the Force or PCC make use of risk appetite to inform risk ratings? I'm not sure a 'red' or 'amber' rating for a risk is necessarily a bad thing and it may inherently carry this level of exposure regardless of any mitigation but one which we are happy to take on.</p>	<p><b><u>Response from Neil Chamberlain</u></b>  We are working closely with the HO and they are indicating informally that they will be pragmatic if Forces are unable to meet the recruitment targets in the short term. There is a possibility that targets will be re-profiled over the 3 years. The Force continues to drive recruitment but understandably the current position is affecting both the numbers and the process to deliver against current expectations.</p> <p><b><u>Response from DCC Rolfe (WMP)</u></b>  Yes</p> <p><b><u>Response from Mark Kenyon(OPCC)</u></b>  The PCC's risk strategy and register scoring mechanism is based on the delivery of the Police and Crime Plan. Therefore the scoring is based on an assessment from the PCC's senior management team on the delivery of plan. In the assessment there is recognition of the risk appetite, this is reflective of the nature of the priorities in the plan and their complexity.</p>
Item 9	Richard Hollands	<p>Has the disruption of Covid 19 meant that the plan's delivery will now be affected given that much of it is 'backloaded' to occur in the latter part of the year? Is there a need to re-shape or re-prioritise work as a result or scale back coverage? (Totally understand if this is the case).</p>	<p><b><u>Responses from Lynn Joyce</u></b>  A number of jobs were ongoing at the point the Government requirement for people to work from home was instigated. Internal Audit have therefore had to change the way we work and how we interact with staff assisting us during those audits. This, coupled with staff availability, has resulted in some meetings being postponed or cancelled. Also, as we rely on testing within some systems that we do not have direct access to, we are finding alternative ways to obtain that data on which to base assurance. This has inevitably delayed progress, but we are continuing to work on those reviews to try to bring them to a conclusion as quickly as we can. I anticipate that this may impact the planned performance target of 90%, but not significantly. As an addition, for those ongoing audits that are critical business areas that may be impacted upon by Covid-19, e.g. Supplier Relationship Management and Cyber Security, we are</p>

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		<p>4.3/4.4 Partly a question due to me being new to the Committee and to help my understanding, but what happens with 'Not Implemented' recommendations given the implementation rate of 87%? This seems a little low and I would probably expect to see it above 90% - is there a reason?</p> <p><b>Appx 1</b> <b>Management of repeat offenders.</b> Is the low rate of training take-up due to anything (e.g. capacity, leadership or sponsorship of this area)?</p> <p>Most of the areas reported upon in the progress paper return a negative audit opinion. Again, as I'm new, it would be helpful to know if this is common across the body of work that IA does?</p>	<p>adapting our questions to include the impact of the crisis on those areas and the wider Force.</p> <p>To clarify the process for following up audit recommendations - An initial follow-up is undertaken six months after the report is finalised, when we ask for management update on progress and evidence to support the implementation of medium and high rated recommendations. Occasionally, we may supplement this with our own testing of a sample of transactions. If recommendations are not implemented at that six month review, we continue to follow-up every three months until they are implemented. Any medium or high rated recommendations not implemented are reported to Joint Audit Committee with the latest management response (Appendix 4.) We rely on management to tell us whether a recommendation is no longer relevant/redundant. If management report that a medium or high rated recommendation is not going to be implemented, this will be escalated to the relevant Director/Assistant Chief Constable for them to accept the risk, which is subsequently reported to Joint Audit Committee.</p> <p>The lack of take up on training is mainly as a result of only two CPD days being held during 2019, so there was limited opportunity for officers to attend. Coupled with this, there is also a risk of officers being pulled away from any planned CPD courses if there are a high level of abstractions for their tour of duty. More CPD dates have been planned during 2020. At the end of the CPD events management will review attendance and any officers that did not attend will be prioritised for the next round of CPD.</p> <p>This has been debated in previous Joint Audit Committee meetings and is a consequence of the risk based approach coupled with a small audit team, which results in us prioritising areas of greater risk. As a result, if we do find an issue, the risks are naturally more significant than if we were doing audits that</p>

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		<p>As a general observation, the completed audits reported upon seem to have some common themes running through them, i.e. governance, performance monitoring, record-keeping and departments adopting 'local' practices, rather than a consistent, uniform approach being taken across the organisation for an area. Again, to help my understanding, is this usual or a coincidence for these reviews?</p> <p><b>Follow-up.</b> Some recommendations are 2-3 years old – is there a policy on this, e.g. about them becoming time expired, etc.</p>	<p>were not risk based and were more repetitive and low risk areas. This is common across the sector.</p> <p>This is usual and has been noted by the Committee in previous meetings. This is particularly true where new systems/changes have been implemented and the control frameworks are in their infancy. To mitigate some of the weaknesses we have instigated bi-monthly meetings with the Programme Management Office to update them on issues we have identified for them to consider in future change programmes, and we also liaise with project leads during new major system implementation to ensure lessons learnt are disseminated.</p> <p>There is currently no policy on retiring recommendations. We follow-up every three months and rely on responsible officers telling us if a recommendation is no longer relevant. Of course, we also will consider if a recommendation is redundant, possibly due to a new system being introduced, and liaise with the responsible officer accordingly.</p>

### Key Decisions/Approvals

Ref	Request	Decision/Approval
Item 5	3.1 The Committee approves the proposed Internal Audit Strategy and Internal Audit Work Programme for 2020/21.	<p>Supported by Members</p> <p><i>(Caveat that in light of the operating environment we are now in, that Internal Audit have the option to come back to the Committee and adjust the plan in light of any changing priorities for their assurance work? For example, areas that form part of the 'audit universe' that are not included in this year's plan of work such as business continuity (page 14) and supplier relationships (page 17) may become more significant in the event of continued or increasing disruption arising from events like coronavirus and may add more value in terms of assessing our general resilience and readiness.)</i></p>

Ref	Request	Decision/Approval
Item 6	6.1 The Committee is asked to consider the contents of this report and accept the Accounting Policies to be used in the Group's 2019-20 Statement of Accounts.	Supported by Members
	6.2 The Committee is asked to review and accept the critical judgements used in applying the accounting policies and the assumptions about the future and other major sources of estimation uncertainty.	Supported by Members
Item 7	9.1 It is recommended that the Joint Audit Committee: b. approve the Treasury Strategy Statement for 2020/21. c. approve the criteria for selecting counter parties and the current eligible counter parties and their limits.	Supported by Members
Item 16	3.2 The Committee is asked to reapprove the Terms of Reference and associated working protocols.	Supported by Members