Agenda Item 12

JOINT AUDIT COMMITTEE
26 June 2025

Risk Management Update – West Midlands Police
(Corporate and departmental high and critical)

1. **PURPOSE OF REPORT**

1.1 To provide members of the committee with oversight of the Corporate and departmental (high and critical) risks for the Chief Constable. The report also provides an update on the developments in the organisational risk processes of the force.

2. **BACKGROUND**

2.1 Following the last Committee meeting, Corporate Development continue to improve and develop the risk management offer across the force.

2.2 In the last quarter, Corporate Development continue to embed continuous improvement initiatives for risk management.

2.3 Horizon scanning documents continue to be distributed to all departments monthly, the Risk Team align all potential horizon scanning risks with relevant departments, providing tailored inputs for SLT meetings consideration and scoping within their respective business areas with a view to proactively report on risk. This is then reported through relevant governance across the force.

3. **ORGANISATIONAL RISK MANAGEMENT IN WEST MIDLANDS POLICE**

3.1. In relation to risk management, a summary of our forward plan and activities undertaken over the last quarter are listed below:

3.2. The Risk Team have been in the process of conducting a review of risk appetites across those risks that fall into the assessment criteria, the decisions around whether risks are progressing or require a review are being communicated with the SLT members. Where risks are outside appetite, actions for further mitigation and control have been communicated.

3.3. The Risk Team continue to report into SLT's and Portfolio Governance Boards the Key Performance Indicator (KPI) for risk and our monthly assessment of where we are when compared to previous months reporting.

3.4. Furthermore, the team are currently working to develop an NCALT package, this will be mandated to all Sgt / equivalent staff and above. The training will provide some basic risk identification information to staff and officers to help us improve risk management within the force. The storyboard for this has been written up with a view for training to now build a product for us.

3.5.   The team continue to host lunch and learn sessions, which focus on a specific topic within risk management. These sessions are promoted through the monthly risk bulletin, SLT meetings, and Corporate Communications. For those that cannot attend the sessions, the sessions have been recorded and uploaded to SharePoint for people to access as well.

3.6.   Additionally, the team sit on and actively contribute to what successful risk management looks like for the national thematic sub working groups delivered on behalf of the NPCC.

3.7.   Corporate Development has recently drafted the Assurance Framework that will sit within the Risk Management Policy. This framework will ensure that assurance is provided for the highest risks. Additionally, risks that are due to be closed will undergo an assessment to review assurance is in place, with a view then that those that have been closed for six months will also be assessed within stipulated timeframes.

4   PROJECT RISKS

4.1   In the last quarter, two projects have been closed. One involved speed enforcement and has been concluded without generating any further risks into Business as Usual (BAU).
The second project, related to Axon and Digital Evidence Storage (DES), which has identified two risks moving into BAU. These risks are currently under discussion with the relevant departments. The key issues include the time required for a camera to be docked to upload to evidence.com and the other being the need for a training package to support the implementation and embedment of DES.

5   STRATEGIC RISKS

5.1   WMP has now added 11 strategic risks to the risk register following a review to ensure appropriate alignment, accurate content, and correct context.

5.2   Details of the 11 approved risks are provided in appendix 1. Updates on mitigation measures will be presented at the next meeting, as these have only recently been aligned. The risk descriptions will be reviewed by the risk owners / subject matter experts to ensure they are comprehensive and accurate.

6   NEW CORPORATE RISKS

6.1   There have been no new risks escalated to corporate level in the last quarter.

7   CRITICAL RATED CORPORATE RISK UPDATED

7.1   No corporate risks reflect a critical rating.

8   INCREASED CORPORATE RISKS

8.1   During the last quarter no corporate scores have been increased.

9   REDUCED CORPORATE RISKS

9.1   During the last quarter no corporate scores have been reduced.

10   ACTIVE / OPEN CORPORATE RISKS

FINANCIAL MANAGEMENT	MEDIUM
There is a risk that WMP's finances are not sustainable over the medium term and/or efficiency savings required may adversely impact the operational services.	

10.1. The budget for 2025/26 been signed off by the PCC. The final settlement increases the Neighbourhood Policing Guarantee grant by a further £6.1m to a total of £12.2m.

10.2. WMP have submitted our return to the home office outlining what this will be spent on and await final confirmation of our return being accepted.

10.3. Work will continue the Comprehensive Spending Review (CSR) for future years, until the results of the CSR are published, the future will remain uncertain.

MENTAL HEALTH DETENTIONS	HIGH

There is a risk that legally permissible detention times are expiring before transfer to healthcare can be completed

and as a result:

WMP will be forced, frequently, to choose whether to Breach the law by exceeding the legal limitations established under the Mental Health Act (MHA) or,
Comply with the law and release an individual who may pose a risk to themselves or others.
After the 24hour detention period it is unclear what powers, we can use for use of force. Risk of corporate and personal liability for the officers involved.
The current legal opinion would suggest that either scenario leaves the force liable to legal challenge or impacting significantly on public confidence.

10.4. The risk is still ongoing; despite completing all phases of the Right Care Right Person (RCRP), memorandum of understandings is yet to be signed off.

10.5. This is being flagged up through various strategic governance and national meetings and conversations with partners continue.

10.6. Whilst the first month saw a positive drop in numbers, we are starting to see the number of section 136 return to numbers seen pre RCRP. Another possible impact factor is the recent disclosure that NHS England was going to be disbanded, and local integrated care boards were being expected to cut costs.

10.7. No cases have been raised through Joint Legal Services

OP BRIGHTMIND- CONNECT NOMINAL MATCH AND MERGE PROCESS	MEDIUM

In 2022 WMP Data Analytics Lab algorithm was implemented to identify duplicate records, the list goes to a Robotic automation process referred to as Radical Robot to use the connect match and merge system to merge the records together.
Since launch (Oct 2022) it will have processed hundreds of thousands of records.
In 2024 several records come to light where individual records that are different people have been incorrectly merged. Having checked the Match and Merge process we know:
-The current rules are too expansive
-The algorithm does not 'apply' them correctly

It is beneficial to WMP to merge duplicate records together to reduce the risk of not acting on information that is known but linked to a duplicate record. However, merging records also carries the risk of incorrectly merging Nominal records that do not in fact relate to the same person.

10.8 The current approach is to complete testing before implementing any changes to the match and merge rules.

10.9 As a result of this the Gold group was stood down in February, following reassurance that the testing had been completed which raised no concerns with the match and merge. This is being tracked to relevant governance.

10.10 Further in-depth testing will be completed within the team, scoring reduced to medium.

11. CORPORATE RISKS AWAITING MOVEMENT

11.1 There are currently no corporate risks awaiting movement.

12. CLOSED AND DE-ESCALATED CORPORATE RISKS

12.1 There are currently no corporate risks closed in the last quarter.

DEPARTMENTAL RISKS AND ISSUES (HIGH/ CRITICAL)

13 OPEN/ LIVE DEPARTMENTAL RISKS SCORING HIGH/ CRITICAL

REGIONAL IT CONNECTIVITY- CITRIX	HIGH
Senior Investigating Officers (SIOs) from non-WMP forces require system access but are currently unable to gain it, hindering their ability to fulfil operational responsibilities. *Also, problematic the other way with WMP SOI's unable to access other Forces systems.*	

13.1 IT & D have successfully moved some test users in ROCU to new Azure Virtual Desktop (AVD) solution, and the feedback so far has been positive. This rollout has also been extended to Warwickshire.

13.2 We are currently in the User Acceptance Testing (UAT) phase for AVD solutions. Once this phase is complete, we will begin to scale out to ROCU accordingly. A cost model is being worked through for presentation to the IT & D Senior Leadership Team (SLT).

JLS SOLICITOR ATTRITION AND DEMAND	HIGH
Due to solicitor resignations, it is likely there will be a period of time where we have reduced solicitor capacity to litigate work for WMP and Staffordshire Police in the field of misconduct and inquests.	

13.3 A start date of early June has been confirmed for the incoming second Senior Civil Lawyer, with the Senior Employment Lawyer scheduled to start early July.

13.4 Additionally, a new claims handler joined the team last week.

13.5 The recent recruitment process for the Civil Lawyer role did not yield any suitable candidates, therefore a new recruitment campaign has been launched.

13.6 As the new starts are yet to settle in, their impact on the department has yet to be realised therefore the current risk scoring remains unchanged.

COVERT FLAGS WITHIN CONNECT SYSTEM LINKED TO INTELLIGENCE	HIGH

If a POLE (person, object, location, entity) has a secure or closed flag attached to it, unless you are on the flag owner group you cannot see the detail of the flag. This causes issues as in effect intelligence staff are blind to the existence of what the flag details are such as action to take / not take, SIO details / who to contact This impacts every pole entity in the entire connect system for intelligence, WMROCU and CCU

13.7 Intelligence, ROCU and Connect leads are working together to scope and assess options. Additionally, we are reaching out to Metropolitan Police who are a Connect force.

14 INCREASED DEPARTMENTAL RISKS

14.1 In the last quarter, no new risks were scored as high.

15 REDUCED DEPARTMENTAL RISKS

15.1 In the last quarter one departmental risk was reduced from a high to a medium.

COLLEGE LEARN SINGLE PLATFORM	MEDIUM

College Learn platform will cease to provide a service in 2027. College Learn have stated WMP to begin to utilise own Learning Management System (LMS) for content and training. WMP are vulnerable with not having their own LMS to host own learning.

15.2 Phase one of the LMS project is ongoing. Market appraisals of potential suppliers are set to close in due course and detailed requirement gathering is now underway. The work is being managed through established project governance.

15.3 No outages were reported for College Learn in April. The interim fixes implemented by the college on their servers appear to have stabilised the platform and this is monitored on an ongoing basis.

15.4 The scoring has been reduced to a medium.

16 DEPARTMENTAL RISKS AWAITING MOVEMENT

16.1 There are currently no departmental risks awaiting movement.

17 CLOSED DEPARTMENTAL RISKS

17.1 There is currently one departmental risk at high or critical that has been closed.

CURRENT FUNDING FOR THE COUNTY LINES TASK FORCE ENDING MARCH 2025	LOW

County Lines Task Force and the benefits supporting wide range of force priorities and harm reduction could be lost unless able to fund this from existing force budget.
In addition to the team of investigators which supports a wide range of WMP operations the funding also delivers covert resources and tactics which are utilised regularly to address threat and risk posed by OCGs involved in County Lines activity.

17.2   Funding for 12 months was granted in the last quarter. Wider funding risks are now being captured as part of the strategic risk, therefore the scoring on this risk was lowered and then closed.

18   RECOMMENDATIONS

18.1   The Committee to note the contents of the report and any associated appendices.

CONTACT OFFICER Name: Melissa Horton Title: Senior Risk and Assurance Manager	**BACKGROUND DOCUMENTS**

Appendix 1- Strategic Risks

FUNDING GRANTS	MEDIUM

Ceasing or shortfalls in grant funding would mean that force would need to source funding from the core WMP budget or the activity in the area(s) may need to reduce or cease. This is a force strategic risk for all grants – please refer to tracker attached in documents.

If values are agreed for the current year the risk remains for future years, and each grant may have caveats in relation to the funding which we will need to work through on a case-by-case basis.

MISINFORMATION, DISINFORMATION OR NON-FACTUAL REPORTING WITHIN THE MEDIA AND SOCIAL MEDIA	MEDIUM

There is a risk of our communities trust and confidence in WMP being negatively impacted, heightened community tensions and potential social disruption (i.e. protests) fuelled by misinformation/disinformation. There is a further risk that comments left under such posts can fuel the spread of misinformation/disinformation. Comments may also constitute a criminal offence (i.e. racist) or should be challenged by the force – allowing posts to remain may then further negatively impact trust and confidence in WMP.

COMMUNITY TENSIONS AND POLITICS	MEDIUM

There is a risk of increased public protest and unrest, increased community tensions, reduced perception of public safety and impact on public trust and confidence in policing response to the highly sensitive and politicised events. There is a risk of increased demand on policing - changes in criminality, targeting of vulnerable groups and impact on hate crimes/incidents and safety, wellbeing and welfare of staff may be impacted.

NET ZERO AMBITION	MEDIUM

Risk that WMP is unable to achieve Net Zero 2035 in line with its publicly stated ambitions, due to the capital investment requirements and in particular the cost of heat decarbonisation and building fabric improvements. The accelerated deployment of energy reduction projects and low carbon technologies required to achieve this ambition will also need dedicated resources and governance arrangements which are not currently in place.
Whilst there are no current requirements for the public sector in England to report progress in reducing greenhouse gas emissions it is anticipated that this will change with Government mandating reporting in the future in order to ensure national targets are met.

INTERNAL EV INFRASTRUCTURE AND ULEV STRATEGY FOR FUTURE FLEET TRANSITION | MEDIUM

Phase out ICE vehicles by 2035 and shift to EVs presents a risk for our fleet management strategy, as the current fleet consists of 1884 vehicles of which 80 are full EVs.

Presently, the infrastructure to support an all-EV fleet internally is inadequate.

The market for Ultra Low Emission Vehicles (ULEVs) will include options beyond just electric vehicles, including hydrogen and other alternatives, we cannot assume that the EV infrastructure will be the sole future solution for fleet needs.

FRAUD INVETSIGATION AND PREVENTION | MEDIUM

There is a risk that WMP may have insufficient governance, oversight and performance arrangements over fraud. Additionally, there is a concern that WMP may not be doing enough to support victims in preventing fraud, including providing effective advice to its communities.

END TO END ENCRYPTION | MEDIUM

WMP may not have the capability, ability or technology to intercept or access data sent via End-to-End-Encryption. This may present risks to our investigations and evidence build to secure prosecutions and outcomes for offences which may include terrorism, serious organised crime and CSEA.

This may also present a risk to our ability to intercept communications and data to prevent offences and incidents from occurring.

END TO END ENCRYPTION | MEDIUM

AI creation of increasingly convincing disinformation, deepfakes and generated content (i.e. fraud, CSEA material)
Legal challenges in relation to accountability for any harm caused by AI systems either by generated content or bias/outputs.
Over reliance on AI, impact on core service delivery should we become dependent on AI to complete tasks.
AI producing biased or harmful outputs, as well as unfair decisions being made supported by AI
AI outputs can be skewed by 'data poisoning', where incorrect entries are included in data sets which trains the AI to produce inaccurate outputs, this can also be harnessed by malicious actors through cyber-attacks.
Rapid developments in AI capability which could see safety systems and security measures unable to maintain the same pace in terms of cyber-attacks or the ability of our technology to investigate AI related offences
Skillsets of officers and staff in AI - harnessing its use in WMP, our ability to investigate offences and our trainers to upskill colleagues

RELIANCE ON GLOBAL SUPPLY CHAINS — LOW

Supply shortages due to unexpected disruptions which may impact or cease essential services.

Cost increases and inflation in prices
Potential use of supply chains with unethical practices such as exploitation and environmental degradation in order to maintain supply and essential services

POLICE POWERS- DISPROPORTIONALITY — MEDIUM

Disproportionate use of police powers, such as stop and search, strip searches and use of force, contribute to the ongoing perception that not all communities are treated fairly,

Sense of discrimination and bias felt by some Black, Asian and minority ethnic communities undermines the legitimacy, trust and confidence in policing
Adultification bias where children from Black, Asian and minority ethnic communities are perceived as being more 'streetwise', more 'grown up', less innocent and less vulnerable than other children.
Complaints of discrimination being handled effectively first time in accordance with the revised IOPC guidelines.

CRIMINAL JUSTICE STRAIN — MEDIUM

The consequences of the current criminal justice system strain may have/ having a potential negative impact on the force in terms of performance, offender management, securing justice, outcomes as well as dissatisfaction, trust and confidence and our service to the public.

** NOTE THAT THIS IS NATIONAL WIDE RISK/ISSUE***