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JOINT INDEPENDENT AUDIT COMMITTEE
July 2023

SUBJECT	Internal Audit Reports Implementation Progress
REPORT BY	DCC Steve Cooper
CONTACT OFFICER	Amanda Froggatt, Corporate Development Manager amanda.froggatt@notts.police.uk
SUMMARY AND PURPOSE OF REPORT	
To consider the progress made with the implementation of the recommendations from internal audit reports.	
RECOMMENDATION	<i>That the progress update be noted.</i>

A. SUPPORTING INFORMATION

This report summarises the progress on the implementation of audit recommendations as of July 2023. An analysis of progress on recommendations is detailed in Appendix A. Audits that have been reported as complete to the previous committee are not included.

B. FINANCIAL CONSIDERATIONS

There are no direct financial implications arising from this report.

C. LEGAL AND HUMAN RIGHTS CONSIDERATIONS

The provision of internal audit services is one of the means by which the Police and Crime Commissioner discharges their responsibilities to secure the maintenance of an efficient and effective police force under section 1 (6)(b) of the Police Reform and Social Responsibility 5 2 Act 2011, and the Chief Finance Officer meets her responsibilities under section 151 of the Local Government Act 1972, section 73 of the Local Government Act 1985 and section 112 of the Local Government Finance Act 1988 for ensuring the proper administration of the Commissioner’s financial affairs.

D. PERSONNEL, EQUAL OPPORTUNITIES AND DIVERSITY ISSUES

(including any impact or issues relating to Children and Young People)

None.

E. REVIEW ARRANGEMENTS

The Committee are advised of progress in relation to all Internal Audit Reports at each meeting.

F. RISK MANAGEMENT

Risks are detailed as appropriate within appendices to this report.

G. PUBLIC ACCESS TO INFORMATION

Information in this report along with any supporting material is subject to the Freedom of Information Act 2000 and other legislation.

Appendix A – Internal Audit Recommendations

INTERNAL Audits 2020/23

Date	Title	Recommendations	Total Number Outstanding	Total Number Closed	Update
Mar 2020	Balance Transfers 2020 - All Recommendations closed by Mazars				
Mar 2020	Health and Safety Follow-up 2020 - All Recommendations closed by Mazars				
Apr 2020	Programme Management 2020 - All Recommendations closed by Mazars				
Sep 2020	Victims' Code of Practice September 2020 - All Recommendations closed by Mazars				
Oct 2020	Estates Management October 2020 - All Recommendations closed by Mazars				
Dec 2020	Workforce Planning December 2020 – Satisfactory Assurance <u>Force is due to be re-audited May 2023</u>				
MS/34a9/231220	The Force should complete a mapping exercise and produce a centralised log of all key roles across the organisation, including non-leadership roles which are critical or specialised. Alongside this exercise, individuals who are able to assume these positions in a short / medium / long term capacity should be highlighted.		1	1	MyZone our HR, Payroll and L&D system is being utilised to capture this data. Under the leadership of the SWFP&TPP and working alongside deliverables in our Strategic Workforce Plan, the force is populating all positions with required skills in order that we can match this to postholders skills. We are 13 months post system implementation, all individual skills are now held within the system, with a requirement on Career Conversations to check accuracy.

				<p>Expiration dates are also built into the system and will trigger an email to individuals and line managers to ensure re training takes place. We have captured approx. 80% of the organisations skills by position and these are being built into the position at the current time. Once this work is complete we will be able to match and gap skills and roles. We have sought priority for the development of Power BI tools to push key data to the organisation. We plan to link skills and retirement data imminently.</p> <p>To be monitored.</p>
<p>Jan 2021</p>	<p>Information Assurance Follow up January 2021 – All Recommendations closed by Mazars</p>			

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Feb 2021	Debt Management Feb 2021 - All Recommendations closed by Mazars	
Feb 2021	Core Financials Systems Assurance Feb 2021 - All Recommendations closed by Mazars	
Feb 2021	Seized Property February 2021 - All Recommendations closed by Mazars	
Apr 2021	Wellbeing April 2021 - All Recommendations closed by Mazars	
Apr 2021	Complaints Management April 2021 - All Recommendations closed by Mazars	
Sep 2021	Firearms Licensing September 2021 - All Recommendations closed by Mazars	
Mar 2022	Business Change - All Recommendations closed by Mazars	
Mar 2022	GDPR Follow Up 21-22 - All Recommendations closed by Mazars	
Mar 2022	Information Assurance Follow Up March 2022 - All Recommendations closed by Mazars	
Mar 2022	Risk Management 21-22 - All Recommendations closed by Mazars	
Apr 2022	Health and Safety Follow Up 21-22 – Satisfactory Assurance	

<p>CC/f4ab/20422</p>	<p>The Health and Safety team should undertake trend analysis of cases where there are report errors and non-engagement from managers in order to highlight repeat offenders.</p> <p>The results of trend analysis and incidents of non-engagement from line managers should be flagged and escalated to the H&S Board (Gold).</p> <p>Whether a minor injury is considered as a near miss during reporting should be clarified in guidance documents.</p>	<p>2</p>	<p>0</p>	<p>The Health and Safety team provide trend data to the Strategic Health and Safety meeting as part of the updates.</p> <p>This action is complete.</p>
<p>CC/74b2/20422</p>	<p>The Health and safety team should continue to monitor and prioritise the completion of mandatory training for staff.</p> <p>The importance of completing the training should be effectively communicated to ensure completion rates are increased.</p>			<p>Since the audit, this has regularly been monitored. However, in March 2023 the College of Policing withdrew all mandatory e-learning packages which has had an effect on our compliance. We have been updated (1st June 2023) that replacement packages have been sourced and we are awaiting confirmation of when these will be rolled out. We are tracking this matter via the Strategic Workforce Planning and Training Priorities Meeting due to the potential risk. Nottinghamshire Police have offered to be a pilot force for roll out. In the meantime, we will continue to offer basic H&S as part of new officers and staff intakes.</p> <p>To be monitored.</p>

May 2022	Procurement May 2022 – Satisfactory Assurance			
MS/34b9/15922	The Force to review the Financial Regulations, including the Contract Standing Orders, to reflect any changes following the cessation of services from Mint and changes due to UK's exit from the EU.	2	0	<p>The Contract Standing Orders are currently being reviewed and the plan is for them to be in place for end of June 2023. Consultation has occurred with both CFOs and key stakeholders with an initial draft planned for the first week in June for further review and final sign off.</p> <p>Proposed closure July 2023.</p>
MS/f49b/15922	The Force to determine and publish clear expectations for requestors and the procurement team with respect to the lead times required for procurement activities, including the authorisation of STAs, to ensure that services can be delivered when required and following appropriate procurement activity.			<p>This will follow the implementation of the reviewed Contract Standing Orders so this work will commence in Summer 2023 to ensure appropriate training and knowledge provided to the organisation.</p> <p>Proposed closure September 2023.</p>
Oct 2022	Medium Term Financial Planning 22-23 – Significant Assurance			
CD/0482/71022	The Force should implement formal and regular budget holder training to support the effective management and monitoring of budgets. A training needs analysis should be completed to ensure that it is delivered to those most in need.	1	1	<p>Mandatory budget holder training is scheduled in for late June/early July to cover key stakeholders and those with roles that need to understand finance better. This will cover c.100 staff and officers and allow us to build further training modules/sessions to keep enhancing the skill sets.</p> <p>Proposed closure September 2023.</p>

Nov 2022	Seized Property Nov 2022 - All Recommendations closed by Mazars			
Nov 2022	Business Continuity and Emergency Planning Nov 2022 – Significant Assurance			
	The Force should implement a detailed technical guide for all members of staff on rotational schemes to supplement the training provided.	1	0	<p>Following successful recruitment of a Business Continuity and Risk Officer in February 2023, Business Continuity is now being prioritised with training being an imperative part of the business continuity programme for 2023/2024. All departments are receiving one to one meetings to talk through the process, as well as reviewing their respective plan with assistance. A further training guide will be developed, and ultimately placed on the intranet to be always accessible.</p> <p>Table-top exercises are also taking place and have been planned throughout the year.</p> <p>To be monitored.</p>
Mar 2023	Custody Arrangements 2022-23 – Limited Assurance			
CC/a48b/15323	Management should ensure all detainees are provided notice of their ability to submit a complaint relating to their detention.	6	0	<p>Details on how to submit a complaint is advertised within the suites and HCP rooms and included within the release leaflet that is given to all detainees.</p> <p>This action is complete.</p>

CC/c4a6/15323	Higher mattresses should be available at the Nottingham Custody Suites (NCS) and utilised when identified as necessary to meet detainee needs.			<p>These are on back order for Nottingham Custody Suite. There are higher beds at Mansfield so where possible we can divert people there. If the mattresses are not sufficient then an activity request will be submitted to amend one of the beds.</p> <p>To be monitored.</p>
CC/c4b3/15323	Management should ensure completion of monthly dip sample reviews by inspectors and custody sergeants.			<p>These are completed and compliance checked weekly by the custody managers. Failure to comply is performance managed.</p> <p>This action is complete.</p>
CC/c4b6/15323	Whilst audit is aware that there is a plan in place to implement a forensic testing surface, review of this timeline should be prioritised. Management should ensure that the forensic suite progress is monitored to ensure there are no further delays to its implementation.			<p>Work commences at Mansfield on 19th June 2023. An activity request will follow for NCS. Work at NCS cannot commence until we have designed out the air flow exchange during the build phase.</p> <p>To be monitored.</p>
CC/d4a3/15323	Management should ensure that fire drills are conducted within the Nottingham and Mansfield custody suites on an annual basis. It would be beneficial to establish a recurring set date for drills to ensure their annual completion.			<p>These are diarised for the 1st (NCS) and 2nd (MCS) of each month with annual fire evacuation simulation at each site.</p> <p>This action is complete.</p>

CC/d4a3/15323/15324	Mansfield Custody Suite: The Force should remind Officers of the need to consistently identify detainees at high risk of privacy breach prior to arrival and notify custody staff. This will ensure preparations are made to facilitate their processing in the private booking-in room.			The new booking in desk offers a degree of privacy and the discreet booking in desk area is part of the phase 2 refurbishment scheduled for 19 th June. All juveniles are directed straight to the discreet booking in and radio booking triages pre-arrivals to identify vulnerabilities at the earliest opportunity. This action is complete.
Apr 23	Transport 2022-23 – Satisfactory Assurance			
CD/04a9/18423	The Force should ensure that all vehicle servicing requirements are accurately recorded on TranMan to ensure that servicing due dates are correctly calculated. Additionally, the Force should endeavour to schedule all servicing jobs in a timely manner against the calculated service and/or MOT due dates calculated within TranMan.	3	0	We have service schedule parameters within Civica Tranman which reduce service requirements below the manufacturer recommendations. Due to vehicle availability and enabling police to carry out duties we may, on occasion service a vehicle slightly before or after the planned date within Tranman. This will still remain compliant with manufacturer scheduling. Immediate implementation and Continuous monitoring: This action is complete.
CD/3493/18423	The Force should ensure that vehicle services are accurately recorded in TranMan as per the completed job card.			This will form part of the internal periodic checks.

				<p>Mileage is entered from the completed service paperwork and needs to be accurate.</p> <p>Inaccurate mileage will be picked up through fuel reports however then requires manual adjustment which is time better spent in other areas.</p> <p>Immediate implementation and Continuous monitoring</p> <p>This action is complete.</p>
CD/b480/18423	The Force should include a performance measure in reporting packs to the Corporate Performance Review regarding the on-time delivery of scheduled servicing.			<p>Report can be produced and will be added to performance pack.</p> <p>This action is complete.</p>
Feb 2023	Environmental Sustainability - 22/23 – Limited Assurance			
	<p>The Force should ensure that a new Environmental Management Strategy is developed</p> <p>The Environmental Management Strategy should set out at minimum:</p> <ul style="list-style-type: none"> • Environmental Policy • Environmental Goals & Targets • Environmental Management System (EMS) • Stakeholder Engagement • Continuous Improvement • Environmental Responsibilities • Governance 	8	0	<p>The force is undertaking a procurement process to appoint a consultant to prepare a new Environmental Strategy.</p> <p>To be monitored.</p>

	The Force should ensure that an updated Carbon Reduction Plan is produced, with clear targets and deadlines for the reduction of emissions.			
	<p>Governance mechanisms for environmental sustainability should be established, including, but not limited to the following:</p> <ul style="list-style-type: none"> • Strategic governance body eg. sub-committee or steering group • A sponsor in senior management to provide leadership • Operational delivery group • Clear definition of roles and responsibilities across all mechanisms <p>The governance forum should be responsible for the delivery of the Strategy.</p>			<p>Governance mechanisms will be set out and agreed as part of the Environmental Strategy.</p> <p>To be monitored.</p>
	<p>The Force should address the environmental skills gap.</p> <p>For example, by reinstating the environmental officer position, or by procuring the services of an external consultant to help with environmental initiatives.</p>			<p>Consideration is being given to how best to address the environmental skills gap including scoping and costing an Environmental Officer post.</p> <p>To be monitored.</p>
	<p>The Force should review whether it has capability to undertake emissions reporting for all departments.</p> <p>If it is found that the Force lacks capability, the Force should engage with a supplier or develop capability internally.</p>			<p>The force has a number of routes to report emissions data regarding fleet use. The extent to which these are adequate and achieves the requirements of the recommendations is being explored.</p>

	<p>The Force should consider undertaking SECR reporting and consider publishing it publicly as a matter of best practice and transparency.</p>			<p>This is being undertaken alongside the force developing an appreciation of the Streamlined Energy and Carbon Reporting requirements.</p> <p>To be monitored.</p>
	<p>Once fully established, Procurement should ensure that:</p> <ul style="list-style-type: none"> • A sustainability assessment of the Force's supply chain is undertaken to identify areas of improvement and set sustainability goals. • Environmental sustainability should be embedded within the supplier selection process e.g. scoring of tenders and KPIs. • Procedures should be implemented to obtain assurance regarding suppliers' commitments over the life of the contract. 			<p>This will feature in the procurement strategy.</p> <p>To be monitored.</p>
	<p>When the new/updated Environment Strategy is completed, the Force should consider implementing a mandatory training programme covering areas such as energy conservation, waste reduction, and information on the Force's environmental policies and procedures. The Force should also consider implementing more specific training courses for staff with specific responsibilities eg. training related to sustainable supply chain practices for procurement staff.</p>			<p>This will be undertaken once the Environmental Strategy is in place.</p> <p>To be monitored.</p>

	<p>The Force and OPCC should undertake research into what stakeholder boards and meetings are available relating to sustainability and consider engaging with them.</p> <p>The Force should consider engaging with ESESG and signing the charter.</p>			<p>The Force is engaging with ESESG and is in the process of signing the Charter.</p> <p>This action is complete.</p>
	<p>Departmental, strategic and operational risk registers should be reviewed and environmental risks included where relevant.</p>			<p>This action has been picked up by Corporate Development and will form part of the Risk catch up/training meetings which are currently taking place.</p> <p>This action is complete.</p>
Apr 2023	Risk Management 2022-23 – Significant Assurance			
	<p>The Force and OPCC should ensure that risk registers reporting to governance bodies includes target scores for risks, to ensure appropriate scrutiny of planned future controls.</p>	2	0	<p>Within the ongoing JCAD refresher training, target scores are now a key section, and all departments have been/will be briefed that target scores are to be completed when updating any risks. Target scores are completed to the same capacity as inherent and residual.</p> <p>To ensure oversight, the Strategic Risk Register is reported into Force Executive Board on a quarterly basis.</p> <p>To be monitored.</p>

	<p>The Force and OPCC should ensure that risk register reviews include confirming that all necessary fields have been completed for all risks and that appropriate current controls are in place to support the residual risk score.</p>			<p>Within the ongoing JCAD refresher training, all risk register reviews incorporate updating all fields, whilst also ensuring all risks have an appropriate control measure to reflect their residual risk score.</p> <p>It is a key section discussed with all risk register owners, that information is to be detailed to the necessary levels and within the correct fields.</p> <p>To be monitored.</p>
<p>Mar 2023</p>	<p>Cyber Security Governance - March 2023 – Limited Assurance</p>			
	<p>The Force should implement a cyber security training course to be taken annually, with supporting periodic awareness. The course should cover common security risks such as malware, phishing, security of equipment, social engineering etc.</p>	<p>4</p>	<p>0</p>	<p>Information Management Unit (IMU) have been in contact with other forces in respect of their cyber security training to introduce best practice. A cyber action plan has been prepared. This will incorporate comms messages, cyber training and a tabletop exercise. This is an ongoing piece of work for the next 6 months. From Sept 2023, the IMU will have a Cyber Security Intern for 8 months who will assist on delivering on this piece of work.</p> <p>A post has been created for an Information Technology Security Officer (ITSO) funded between IS and IMU, for this matter, to provide greater cyber security.</p>

				Proposed closure February 2024.
	The IMB should monitor key risk indicators and key control indicators to support its oversight of cyber security. This could include metrics around patching, malware, and perimeter defences amongst others.			Key risks from the SyAP (Security Assessment for Policing) are taken to the Information Management Board (IMB). Notts Police were part of a pilot with PDS and a draft report was provided on 17.5.23, the final version will be with the DCC (SIRO) in June. A dashboard of performance metrics is now included in the slide pack for IMB. This action is complete.
	As already underway the Force should continue to liaise with PDS to gain its SyAP and related Airwave accreditations.			This is an ongoing piece of work by the Information Security and Compliance Team Leader and IS. To be monitored.
	The Force should enhance its technical procedures for dealing with security incidents in line with best practise such as found in the National Institute of Technology (NIST) framework. Where necessary, this should be supplemented with technical guidance upon the approach to managing common incidents.			The SyAP looks to include aspects of the NIST to score the evidence supplied by the force to provide assurance. The technical response/actions information is produced and distributed by NMC to Forces and these are the technical steps that the IT engineers follow. While there will be some common and predictable activities, the specific technical detail is relevant to the specific event itself.

				<p>The initial pre-flight checks are known by the technology teams to establish urgency, impact and proliferation, we will ensure that these are updated and published.</p> <p>This action is complete.</p>
Apr 2023	Seized Property - April 2023 – Satisfactory Assurance			
	<p>The Force should develop specific training for the use of NICHE for seized property and provide this to all new officers and transfers.</p> <p>Additionally, a refresher course should also be developed to utilise the new training portal being developed.</p> <p>This training should include information regarding data quality within NICHE, common errors, the impact of errors and how to report data quality issues.</p>	2	0	<p>In order to address this recommendation the following actions have been taken,</p> <p>The A&E Sergeant has joined the data quality board in order to raise areas of business improvement.</p> <p>All policies have been updated.</p> <p>A seminar has been undertaken to showcase areas for improvement.</p> <p>A review of current training lesson plan has been done.</p> <p>The A&E website has been created with current policies and procedures.</p> <p>The training school (core trainers) stakeholders primarily have been consulted.</p> <p>To be monitored.</p>

	<p>The Force should reinforce to officers the importance of updating NICHE in a timely manner to provide a full audit trail of exhibit movements. This should ensure that officers move items on NICHE after they are physically moved, to ensure that the most up-to-date location is stored on NICHE at any time.</p> <p>Where necessary, this should continue to include the contact of offending officers with the policy and any additional training required.</p> <p>The Force should investigate the ability to place physical dividers between racking locations on rolling shelving at Southern Main Store to ensure that items are kept in their recorded positions while using rolling shelving.</p>			<p>Archives and exhibits work on the Niche 4 management system which underpins the front facing Niche 5 system used by front line operation staff and police officers. The key element to the information is the understanding of how the Niche 4 manages a movement structure for the exhibit by A&E staff only. Niche is currently under review, and we are awaiting an update on what is to be expected.</p> <p>The new separation methods for segregating the bays at Tom Ball Hall have been measured and costings are being gathered for financial support to implement this process.</p> <p>To be monitored.</p>
Apr 2023	Core Financials Draft - April 2023 – Limited Assurance			
	<p>The Force should remind staff of the need to ensure an authorised credit note form is held prior to processing.</p>	10	0	<p>A new form has been designed and implemented. A request for a credit note will only be actioned once this form has been completed, providing an explanation of why the credit note is required. This is then reviewed and authorised by the Financial Controller or Head of Finance.</p> <p>This action is complete.</p>

	<p>As the Force are now aware of their debt position, they should begin to chase historic debt and take relevant debt management actions (to be outlined within their policy) accordingly).</p> <p>Further, the Force should complete and ratify their 'Management of Accounts Payable and Receivables' Policy, to ensure a consistent approach is taken regarding outstanding debt.</p>			<p>A new draft debt policy has been provided for review to internal audit and we are in the process of circulating to obtain management sign-off by the CFO and Head of Finance. An aged debt report is being designed to capture the outstanding debt and age profile now that the bank account has been reconciled and AR postings have been made to give the outstanding debt position.</p> <p>This report will be used to monitor and also in the process of recovering outstanding debt. It will also identify aged debt that may require writing off according to the debt policy. Ongoing, debt collection will be actively monitored and chased.</p> <p>To be monitored.</p>
	<p>The Force should record the member of staff verifying whether data has been inputted into iTrent correctly, along with the date and time ensuring a sufficient audit trail is present.</p>			<p>The spreadsheet files currently used to record the changes have been adapted to contain additional fields to record that a secondary check (ie name and date) has been undertaken to verify any amendments made to an officer/staff payroll details before passing this information onto payroll.</p> <p>This action is complete.</p>

	<p>The Force should ensure that all forms are adequately authorised by a secondary member of staff to ensure sufficient segregation of duties. Invoices should be raised in a timely manner to minimise the risk of not being paid potentially causing financial instability.</p>			<p>The New Debtor forms follows the same process as the New Supplier via the Systems Team. Requests are supported by email approval; however, it is noted the form is not physically signed by one or more member. Therefore, the aim moving forward is to have requests forms signed by the appropriate requestor and approver to challenge and ensure segregation of duties. The day-to-day credit control activities fall under the responsibility of the Senior Finance Assistance, and the force is currently looking at implementing KPI reporting to monitor the turnover of requests.</p> <p>To be monitored.</p>
	<p>The Force should ensure appropriate level of spot checks are established to provide assurance over the self-approval expenses.</p> <p>The Force should update their expenses policy to include coverage of car parking tolls. This will ensure a consistent approach to processing expenses is taken.</p> <p>Similarly, the Force should update their 'Professional Subscriptions Manager Guide' to correctly refer to the systems now utilised.</p>			<p>The professional subscriptions policy requires review and update by People Services to ensure it fits in with the current MHR system and MFSS references have been removed.</p> <p>A dip sample of expenses is carried out on a monthly basis to ensure expenses submitted comply with expense policies.</p> <p>Proposed closure September 2023.</p>

	<p>Best practice within the sector includes the regular spot checking of manual journals, at least quarterly.</p> <p>The Force should undertake regular checks of journals posted to the General Ledger, and should establish a set protocol of journals to be targeted (eg. time specific entries, high-value entries).</p>			<p>Partially Accepted. With regards to journals carried out in-year through I&E we would pick up anything odd or erroneous through the monthly management accounts review. Spot checking also occurs alongside P12 closedown.</p> <p>Action complete.</p>
	<p>The Force should ensure that all forms are adequately authorised by a secondary member of staff to confirm the request is legitimate and adequate and segregation of duties is present.</p>			<p>This will be removed through the use of new supplier called SFR from early Sept 2023.</p> <p>Action complete.</p>
	<p>Supporting evidence should be retained for all voluntary deduction requests.</p> <p>Further, all voluntary deduction requests should be subject to a secondary check to ensure accuracy of the deduction. Evidence of the check should also be retained.</p>			<p>Procedures have been reviewed and adjusted as necessary to ensure that information provided by the third party for the voluntary deduction is recorded/saved; a record of who made the amendments recorded in the payroll system; and who undertook the secondary checks.</p> <p>Action complete.</p>
	<p>The Force should ensure that old and outdated forms used by MFSS are not accepted as part of their financial processing.</p>			<p>A review of all forms has been undertaken and updated as necessary.</p> <p>Action complete.</p>

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	<p>The Force should ensure that all paying-in vouchers are clearly double signed, this is to ensure appropriate review of all receipted monies.</p>			<p>The current method is to have two people involved to ensure there is segregation of duties.</p> <p>The procedures are being updated to reflect that documents need to be double signed and checked to ensure segregation of duties.</p> <p>Proposed closure September 2023 on reviewing evidence.</p>
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