Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies
Follow Up Review – Suffolk Only

2018/19

tiaa

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Executive Summary

INTRODUCTION

1. The follow up of internal audit recommendations by TIAA is undertaken throughout the year and reported to the Audit Committee during the year at each meeting.

2. The summary tables show the number of raised and brought forward priority 1 (P1 - Urgent) and priority 2 (P2 - Important) recommendations implemented since being reported to the May 2018 Audit Committee meeting and those outstanding past their implementation dates.

Figure 1 - Summary of implemented and outstanding Recommendations

Evaluation	P1 - Urgent Recommendations	P2 - Important Recommendations	P 1 & 2 Recommendations
	Number	Number	Total
Implemented Since Last Meeting	0	8	8 (24%)
Outstanding (incl. deadlines extended*)	3	22 (12*)	25 (76%)

Figure 2 - Summary of Recommendations

Audit Ref	Audit Area	Date Presented to Audit Committee	Assurance Level	Previously reported as complete to Audit Committee		Completed since last Audit Committee			Outstanding with Extended Period Agreed		Outstanding - Previously reported as outstanding		New since last Audit Committee		Total Outstanding	Not Yet Due for implementation	
				P1	P2	P1	P2		P1	P2	P1	P2	P1	P2		P1	P2
2016/17 Internal Audit Reviews																	
NSC1703	Transport	Sep-16	Reasonable		1					3					3		
NSC1704	Corporate Communications	Sep-16	Reasonable				3								0		
NSC1707	Duty Management	Dec-16	Limited		6					2		2			4		
NSC1710	Catering - Suffolk only	Dec-16	Limited		4		1								0		
NSC1714	Overtime, Expenses	Mar-17	Reasonable		3							1			1		
NSC1716	Pensions	Mar-17	Reasonable							1					1		
NSC1723	ICT ERP	Jun-17	Reasonable									1			1		
NSC1725	Health and Safety	Jun-17	Reasonable				2								0		
2017/18 Internal Audit Reviews																	
NSC1802	ICT Mobile Device Mgt	Sep-17	Reasonable		2							1			1		
NSC1804	L&D Skills	Jul-18	Limited										1	1	2		5
NSC1810	Temporary Recruitment	Feb-18	Reasonable		2					1					1		

NSC1811	Procurement	Sep-17	Reasonable		2						1			1		
NSC1814	Risk Management	May-18	Reasonable						2					2		2
NSC1817	Data Quality - Athena	Nov-17	Limited								3			3		
NSC1819	HR Absence Management	Mar-18	Limited		2			1	1					2		
NSC1829	Payroll	Mar-18	Limited				1			1	2			3		
NSC1830	Accounts Payable	Mar-18	Reasonable				1							0		
TOTALS				0	22	0	8	1	10	1	11	1	1	25	0	7

KEY FINDINGS

3. There are three urgent recommendations outstanding and past the agreed deadline:

    3.1 Payroll (NSC1829) – this is regarding checks and balances for pensionable pay, for which a reporting tool is being pursued. A revised date was agreed and applied.

    3.2 L&D Skills (NSC1804) – this issue is around the skills data held by Learning and Development, the timescales were ambitious, following which the service manager has left the Constabularies. Discussions are being held with the department to identify reasonable timescales for implementation.

    3.3 HR Absence Management (NSC1819) – the issue is around the consistency of data between ERP, Enact and DMS, which is being investigated. An IT audit is due to be undertaken once resolved to review the systems. This has been moved back to Q2 whilst the issues are being resolved.

4. Any recommendations in relation to policies are advised as in progress and require consultation prior to implementation. A revised policy review process has commenced to reduce the extent of time taken to update / approve policies, which will continue to be monitored as part of the follow up process.

5. It is noted that the majority of recommendations continuing to remain outstanding are largely due to resource and IT requirements to be sourced.

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THE BREAKDOWN OF THE ACTIONS ON RECOMMENDATIONS KEY:

- The direction of travel for implementing recommendations is shown from right to left.

- The audit will remain on the table until all P1 and P2 recommendations relating to that audit are complete and reported as such to Audit Committee, including those previously reported. Once an audit is reported as complete (highlighted in grey), the audit will be removed from the table.

- Outstanding with extended period agreed – outstanding past original deadline and an extension has been agreed with management.

- Outstanding and previously reported as such to Audit Committee – outstanding past agreed deadline and no extension has been agreed.

- New since the last Audit Committee meeting – deadline has recently passed and the recommendation is outstanding.

- Total outstanding – includes; extended period agreed, previously reported as outstanding and new outstanding.

- Not yet due for implementation – the agreed implementation deadline has not been reached.

SCOPE AND LIMITATIONS OF THE REVIEW

6. The review considers the progress made in implementing the recommendations made in the previous internal audit reports and to establish the extent to which management has taken the necessary actions to address the control issues that gave rise to the internal audit recommendations. The implementation of these recommendations can only provide reasonable and not absolute assurance against misstatement or loss.

7. The responsibility for a sound system of internal controls rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses that may exist. Neither should internal audit work be relied upon to identify all circumstances of fraud or irregularity, should there be any, although the audit procedures have been designed so that any material irregularity has a reasonable probability of discovery. Even sound systems of internal control may not be proof against collusive fraud.

8. For the purposes of this review reliance was placed on management to provide internal audit with full access to staff, accounting records and transactions and to ensure the authenticity of these documents.

RELEASE OF REPORT

9.   The table below sets out the history of this report.

Date draft report issued:	N/A
Date management responses recd:	N/A
Date final report issued:	18th July 2018

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Detailed Report

FOLLOW UP

10. Management representations were obtained on the action taken to address the recommendations. Only limited testing has been carried out to confirm these management representations.

11. The following matters were identified as outstanding past their original/revised deadline:

Audit Title	Recommendation	Priority	Management Response	Responsible Officer	Due Date	Expected Completion Date	Last Update	Latest Response
NSC1707 Duty Management System	The exception rules inbuilt within DMS to be investigated to see if these are correct.	2	The RMU are currently working on exceptions and discussing with Crown the feasibility of changing the exception rules.	Chief Finance Officer (Norfolk)	31/03/17	30/06/18	05/04/18	A review of all the exceptions being generated by DMS is underway to agree what is required to update DMS or change working practices to eliminate, where possible exceptions. This work is being completed by the ERP Programme Delivery Manager and the RMU-System/Support and Management Information manager. A process for approving changes to the set-up of DMS has been agreed.

Audit Title	Recommendation	Priority	Management Response	Responsible Officer	Due Date	Expected Completion Date	Last Update	Latest Response
NSC1707 Duty Management System	Monthly reconciliations to be undertaken between DMS and payroll to establish if the value of overtime on DMS agrees with the value of overtime paid by payroll.	2	Not all areas of the business provide information of Overtime to the RMU, and therefore this is challenging to deliver. This would be a Finance task.	Head of Transactional Services	30/06/17	30/06/18	05/04/18	A review of all the exceptions being generated by DMS is underway to agree what is required to update DMS or change working practices to eliminate, where possible exceptions. This work is being completed by the ERP Programme Delivery Manager and the RMU-System/Support and Management Information manager. A process for approving changes to the set-up of DMS has been agreed.
NSC1714 Overtime, Expenses and Additional Payments	Joint expenses policies for Norfolk and Suffolk Constabularies for police officers and police staff to be developed. The updated expenses policies to be placed on the intranet.	2	New Conditions of Service for Police Staff are to be introduced from April 2017 (this was expected to be implemented in October 2016 but was delayed nationally). As a result we will take this opportunity to revise once the new Conditions have been agreed and implemented.	Head of Transactional Services	30/06/17	31/03/18	27/06/18	The HR Policy team are progressing joint policies and the expenses policy is a priority but not yet been completed. Internal Audit: Recommendations relating to implementation of a new policy remain as outstanding until new policies have been approved and implemented. Due to the time taken to approve policies, such recommendations may remain for extended periods. This could impact on outdated processes remaining until a policy is approved.

Audit Title	Recommendation	Priority	Management Response	Responsible Officer	Due Date	Expected Completion Date	Last Update	Latest Response
NSC1723 ICT – ERP Second/Third Line Support (to c/f)	Business areas to be formally assigned ownership of processes that relate to their areas of responsibilities. Such areas include the management of interface jobs, error resolution and data reconciliation, working with other business areas as required to ensure that the processes are managed effectively.	2	An ERP and Shared Services Programme Board has recently been constituted. One of the key work streams is to clarify system management responsibilities and improve system governance. The issues highlighted will be addressed within the programme of work.	Co-ordinator - ERP System and Supplier Manager	31/03/18	30/09/17	22/03/18	This is now 98% complete with the few outstanding items to be agreed with Cap Gemini.
NSC1802 ICT Mobile Device Management (body worn video)	The existing "Mobile App Request" process to be updated to include the following as a minimum - documented approval from the requestor's line management; A list of Active Directory groups that the app is to be provisioned for; testing results showing the app not conflicting with other apps in the whitelist, Information Security Office comments and	2	ICT to discuss with ISO required modifications to the existing forms and process.	Information Management	29/12/17	30/03/18	22/06/18	A process is in place to approve the use of a Google Play App. Information Security (IS) receive a form from ICT requesting app usage, IS research the app in relation to the guidance from the NCSC and approve, where applicable, the app for use on police devices. The form is then forwarded to the ICT Service Desk to install the app.The IS officer is still in the process of developing the more detailed form which ICT have outlined, to cover a greater range of internally and externally developed apps. IS has a very rough draft form, but due to other commitments has yet to move it forward.

Audit Title	Recommendation	Priority	Management Response	Responsible Officer	Due Date	Expected Completion Date	Last Update	Latest Response
	recommendations; final sign off for the decision to deploy or not; Requestor's business case for the request; next review date; the owner of the app to be consulted during the review cycles, including app update.							
NSC1804 HR – Learning and Development	A full review of the skills data recorded on ERP to be undertaken, requesting skills data held and trainers from individual departments, to ensure that ERP has an accurate record and can be used to identify skill requirements and gaps across the forces.	1	The ERP skills review is well underway. The findings are being fed into the ERP Board for future changes to the ERP system, which will require change requests. The ERP Board has agreed the procurement of new management information software for the ERP system, which will also provide assistance in this area.	Temporary Chief Inspector - Operational Training Manager	27/06/18	27/06/18	06/07/18	Due to the changes in Learning and Development, this is being progressed.
NSC1804 HR – Learning and Development	Training expiry dates be assigned for all courses, to enable reminders to be sent at designated intervals and/or ERP updated with a new expiry date.	2	Automated ERP reminders are problematic owing quantity. Force Announcements have advised individuals that it is their responsibility to understand their own skill profile.	Temporary Chief Inspector - Operational Training Manager	30/06/18	30/06/18	06/07/18	Due to the changes in Learning and Development, this is being progressed.

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NSC1811 Procurement – Compliance with CSO within departments	Orders on Tranman to be authorised electronically, and authority limits on Tranman to be set so that they are in line with the Constabularies joint contract standing orders.	2	A review of the present and potential automation of Tranman will be carried out with a view to cost effectively maximising the ability of the system where appropriate. Transport service will adopt the organisations purchasing activity limits.	Head of Finance / Head of Transport Services	31/03/18	30/06/18	27/06/18	Tranman was updated by Civica in December 2017. Unfortunately they put the authorisation on the back end at the invoice stage on Tranman, which they did for free. Although this has now been removed.They provided a quotation, to charge for the approval process in the right place, £10k. A request for change form is to be submitted to the Organisational Board for approval of the funding.
NSC1817 IM - Data Quality	A review of the two dashboards be undertaken and a decision made as to whether both dashboard reports continue to be run, and in their current format.	2	Any changes to the Dashboards (DB) require other Athena Force Data Quality (DQ) Leads, the Information Management User Group (IMG) and to be ratified by the Athena Business Design Authority. Work is taking place by the (regional) Athena DQ Sub Group to review the reporting mechanisms. The DQ & Audit Officer requested the criteria for the DB be reviewed at the IMG DQ Sub group, as the findings are to large for business areas to tackle. Unless resource is available to attack DQ risk areas on a daily / weekly basis then DB 1 is redundant. DB 2 (run monthly) would give an overview of data trends.	Information Compliance Manager	01/04/18	01/04/18	22/06/18	The Athena DQ Group no longer runs, as the chair does not have the capacity to run or engage with this. This has been raised to the SIRO and we await the outcome. To this end this action is not able to be completed, as this work is directed by this group.

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NSC1817 IM - Data Quality	Regular reports be provided to departments on potential data errors so that departments can target specific areas.	2	Changes have been made to reduce the errors. The Data Quality team cannot look into the variance of issues outside the match & merge queues but intends to do so based on the improved reporting mechanisms from the AMO. The missing data tends to relate to areas such as intelligence where it is expected there will be a level of missing data due to the nature of the work. Revised reports are being developed by the AMO. Also an Athena DQ Comms strategy is being written by the Information Compliance Manager. The Dashboards do not produce data that can be taken to business areas.	Information Compliance Manager / Records Manager	01/04/18	01/04/18	22/06/18	The Data Quality and Audit Officer post is still vacant and this work is directed to this post. The DQ team work on a list that is created within Athena and prioritises this in accordance with their processes, due to the large amount of errors this work will be continuous with the staff allocated.
NSC1817 IM - Data Quality	A resolution be sought on the outstanding and growing duplicate Athena records across each of the categories.	2	The 500 limited is a technical limitation set by the AMO. A current change notice is being proposed to remove cases which have been reviewed but that cannot be merged, from the match & merge list. There is a cost element to this change which has to be agreed and prioritised by the BDA and AMO. Issues remain unresolved in Athena that impacts on the level of duplicates in the system. Updates to Athena have	Head of Information Management / D/Supt Joint Justice Command - Athena Lead	01/04/18	01/04/18	22/06/18	The Head of Information Management is meeting with the Athena Project Team to discuss the force business case proposals on how this can be resourced in future.

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			helped reduce some of the duplication though a number remain in the system due to the previous issues and need to be cleared. Improved training on DQ at the front end of Athena is crucial to success.					
NSC1829 Payroll, including ERP Reporting	System controls on Enact to be investigated, to ensure Enact forms can only be approved by the relevant authorised signatory and prevent employees from approving their own Enact forms.	1	Enact has only one more year under contract, and the intention is not to renew this product. Instead a review is underway into products that are either already part of the Oracle ERP suite, or integrate into that platform. However, conversations are underway with the Enact provider Encircle and early indications are that they can make this change at minimal cost. However, if significant investment was required this will not be undertaken as any investment will be into the replacement system.	Head of Transactional Services	30/06/18	30/06/18	27/06/18	Encircle have developed a solution for this and it is currently in the development database, with a plan to release to the live database shortly.

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NSC1829 Payroll, including ERP Reporting	The reporting functionality on ERP to be explored so that all necessary reports can be provided to enable line managers to have all necessary information, including a report of new starters, leavers and changes within the monthly payroll.	2	Heads of Department have regular meetings with their management teams, and with HR and Finance Business Partners to understand their staffing position. However, a business case is in draft in connection to a new reporting solution and funding has been provided within the MTFP. The reporting solution will have much wider benefits than the more narrow issue outlined here.	Head of Transactional Services	30/06/18	30/06/18	27/06/18	This is reliant upon the new reporting tool, which has not yet been deployed.
NSC1829 Payroll, including ERP Reporting	Resources to be allocated to addressing the issue for the 70 employees that have not been included on the FPS report, to rectify that for these employees their ability to claim state pension is not affected.	2	This is a complex issue and work has been ongoing within CapGemini to arrive at a solution. Also discussions have been taking place with HMRC on the issue. The latest position is that an Earlier Year Update (EYU) process will be run to correct the position and provide HMRC with the correct information about the individuals concerned.	Head of Transactional Services	30/06/18	30/06/18	27/06/18	A fix has been provided by CapGemini and has been tested successfully in the test environment.

12.   The following matters were identified as being given a revised date, which has not yet been reached:

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NSC1703 Transport Services	The weekly vehicle check form be standardised across both counties.	2	Norfolk weekly check sheets fall under the remit of the Driver of Police Vehicles Force Policy Document, with the Policy owner being Specialist Operations. Within Suffolk the remit is with the County Policing Command. Norfolk and Suffolk Constabularies are aligning their equipment levels and types. This will then allow the use of one form across both Counties.	Head of Transport	31/12/16	30/07/18	27/06/18	The joint equipment inventory and weekly vehicle check form (that contains the equipment levels) has been updated and is being presented to the Health and Safety Committee for sign off on 19th July 2018, following which it will be immediately rolled out across both Constabularies. Internal Audit: This is expected to be closed by 31st July 2018 following the Health and Safety Committee meeting and distribution.
NSC1703 Transport Services	The system for recording and monitoring the completion of the weekly vehicle checks be standardised and a system for central oversight of the results of the checks be implemented.	2	There is scope for the central reporting hub to be Transport services. This will be progressed through the Transport Strategic Group.	Head of Transport	31/12/16	31/07/18	27/06/18	The process has been standardised and the weekly check form is going to the Health and Safety Committee on 19th July, following which the process to monitor the standardised approach will be immediately implemented.

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NSC1703 Transport Services	The Joint Transport Policy be subject to document control and approval process and current operating procedures should be updated and maintained.	2	This is a Transport Services only Policy as it was determined the Policy was more aligned to a standard operating procedure. The standard operating procedures are in the process of being updated to reflect T13 restructure and process changes.	Head of Transport	31/10/16	30/09/18	27/06/18	The Transport policy/SOPs have all be revised and the first draft sent to the Policy Officer to go through the review process. The process timing will determine the completion of the recommendation. A revised date of 30th September 2018 as been set by internal audit for an update on going through the review process.

Internal Audit: Recommendations relating to implementation of a new policy remain as outstanding until new policies have been approved and implemented. Due to the time taken to approve policies, such recommendations may remain for extended periods. This could impact on outdated processes remaining until a policy is approved. |
| NSC1707 Duty Management System | DMS to be used for recording overtime, and investigated to establish if approval of overtime can be recorded on DMS. | 2 | The RMU is working to reduce exceptions before embarking on the issues with overtime. Delivering overtime will require a project to be set up to deliver training and understanding to all line managers and the confidence that claims will be accurately recorded. | Chief Finance Officer (Norfolk) | 31/01/18 | 31/08/18 | 05/04/18 | Whilst the exceptions work is being completed we have agreed that we will not switch on the overtime claims approval process. To ensure overtime is approved correctly a temporary form outside DMS will be completed. Once the exceptions rules have been clarified a project will be set up to develop the overtime functionality within DMS.

Alternative processes are in |

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								place to manage overtime, using DMS would minimise the use of alternative temporary solutions.
NSC1707 Duty Management System	A full audit trail for all aspects of DMS to be made functional.	2	It has been raised with Crown the requirement to have an audit on the notes section on DMS, as have other Police Forces. This is with their Research and Development team to be looked at in the relation to future releases.	Chief Finance Officer (Norfolk)	30/06/17	31/03/19	05/04/18	This is still being considered by Crown for a future release of the DMS system. When Audit functionality is implemented this often affects the performance of systems and this will need to be tested and reviewed before any audit functionality within DMS is used.
NSC1716 Pensions Administration	The payroll system to be investigated to establish if a report can be run to calculate pensionable pay for staff.	2	The pension contributions are set at system level and the appropriate contribution is deducted from the employee in accordance with their pensionable pay each month. I accept that we cannot check this at a global level, however I am confident that the deductions made are correct at an employee level and the necessity for a pensionable pay figure is not considered as a significant issue. However when reporting for ERP is reviewed then this will be considered as part of the requirements.	N/A	01/03/17	30/09/18	07/03/18	Checks, balances and reconciliations that are completed in respect of pensionable pay, including some very challenging returns to Local Government Pension Scheme and Police Officer pension administrators at year end. The Audit Committee accepted these mitigations. In addition, the Constabulary is pursuing a new reporting tool that will address the issues but this will not be implemented until 2018/19.

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NSC1810 Procurement – Temporary Recruitment	The Constabularies to assess potential conflicts of interest for agency staff and where appropriate convey this to the agencies, requesting a conflict of interests form be completed where required, in line with employed staff, possibly as part of the service agreed with Reed.	2	This will be discussed at the next HR Leadership Team Meeting on 20 February 2018, with a view to requesting Reed to complete this for the Constabularies, and establishing arrangements for other suppliers.	Head of HR	31/05/18	31/08/18	01/07/18	A draft form has been created, and will be sent to Reed to include as part of their process, by 31st July 2018 for completion.
NSC1814 Risk Management – Mitigating Controls	Controls on the strategic risk register be made specific, applying the 'relevance' approach, to enable them to address the risk identified.	2	Linked to Action Plan Finding 4 (above).A pilot of the revised template for the Joint Strategic Risk register will incorporate this recommendation.	Risk & Compliance Manager	08/06/18	31/08/18	27/06/18	In progress, controls have been separated for the strategic risks. It is anticipated that the remaining risks will be updated by 31/8/18.
NSC1814 Risk Management – Mitigating Controls	Proposed revisions to the risk register be adopted and populated for each risk register, to include administrators for each risk / control in addition to the overall owners; assurances (internal and external); separating current	2	Following discussions with CFO's it is recommended that the proposed new template is trialled for a period of 6 months on the Joint Strategic Risk Register only. A report detailing the proposed changes and seeking agreements for the commencement of a trial will be presented to Chief Officers at the June 2018 JCOT meeting. A further	Risk & Compliance Manager	08/06/18	31/08/18	27/06/18	In progress, risks in the strategic risk register have been updated and the remaining ones to update. It is anticipated that the strategic risk register will be updated by 31/08/18. A decision will be made on the operational risk registers as to whether this approach will be adopted following this.

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	controls and assurances with proposed actions for further controls and assurances; and separating current risk scores from those anticipated once proposed controls and assurances are in place.		report will be produced, post-trial, to analyse the findings and propose a way forward with regard to the revised risk register template.					
NSC1819 HR – Absence Management	A briefing note be prepared to staff on the appropriate means for recording of sickness, including accounting for free/rest days. The briefing note to be circulated to all Line Managers.	2	The Management Information Team have reviewed this action and this does not inflate our reported sickness figures. This is because we report on number of working hours lost, which does not include rest and free days. This does affect operational police officers, as they could be called in if they are fit, and therefore guidance will be updated and circulated via HRAs.	Operational HR Manager	31/05/18	31/07/18	01/07/18	A sickness guide for managers has been prepared, this will be updated to include explicit reference to the issue raised and be provided by 31st July.

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NSC1819 HR – Absence Management	A review of data entered on ERP, Enact and the Duty Management System (DMS) be completed to ensure that it is following the correct processes to ensure it continues to align.	1	The list of anomalies has been reviewed by the Management Information Team. Many of the differences are related to the way in which the different systems count sickness, rather than user errors. This may be difficult to address, but there has been progress made to ensure that the relevant processes are followed thus reducing genuine errors causing inconsistency. This will be an ongoing review, with a review date of June 2018 to review progress.	HR Service Centre Manager	30/06/18	30/09/18	27/06/18	The list of anomalies has been reviewed by the Management Information Team. Differences relate to the way the different systems count sickness, rather than user errors. This may be difficult to address, but there has been progress made to ensure that the relevant processes are followed thus reducing genuine errors causing inconsistency. This is an ongoing review, with a review date of September 2018 to review progress.