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

2019/20

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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 March 2019 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	May 2019 Position	March 2019 Position for Comparison
	Number	Number	Total	Total
Implemented Since Last Meeting	1	13	14	20
New Overdue Recommendations Added Since Last Meeting	0	0	0	7
Outstanding (incl. deadlines extended*)	2	27	29	34
Original Deadline Not Yet Reached	0	21	21	18

Figure 2 - Summary of Recommendations

Audit Ref	Audit Area	Date Presented to Audit Committee	Assurance Level	Completed since last Audit Committee			New since last Audit Committee		Outstanding / Overdue		Outstanding with Extended Period Agreed & Not Reached		Not Yet Due for implementation	
				P1	P2		P1	P2	P1	P2	P1	P2	P1	P2
2016/17 Internal Audit Reviews														
NSC1703	Transport	Sep-16	Reasonable		1									
NSC1714	Overtime, Expenses	Mar-17	Reasonable									1		
NSC1716	Pensions	Mar-17	Reasonable		1									
2017/18 Internal Audit Reviews														
NSC1811	Procurement	Sep-17	Reasonable		1									
NSC1812	Business Interests	May-18	Reasonable		1							1		
NSC1814	Risk Management	May-18	Reasonable									1		
NSC1817	Data Quality - Athena	Nov-17	Limited									1		
NSC1823	Overtime, Expenses	May-18	Limited		1							1		
NSC1825	Corporate Policies	May-18	Limited		1									
NSC1829	Payroll	Mar-18	Limited	1	1							1		
2018/19 Internal Audit Reviews														
NSC1901	Governance and Whistleblowing	Mar-19	Reasonable											3
NSC1906	Enact Replacement	Nov-18	Reasonable		1							1		
NSC1907	GDPR	Nov-18	N/A		2									
NSC1909	Key Financials	Mar-19	Reasonable											3
NSC1910	Capital Programme	Nov-18	Reasonable											1
NSC1912	Allowances	Nov-18	Limited								1	2		

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Ref	Area	Date	Assurance											
NSC1915	Establishment	Mar-19	Reasonable											4
NSC1917	Vetting	Nov-18	Reasonable		1							1		1
NSC1919	Transport Procurement	Mar-19	Reasonable		1									
NSC1921	Estates Strategy	Nov-18	Reasonable		1									
NSC1922	Stations	Nov-18	Reasonable									1		1
NSC1929	Lone Working	Nov-18	Reasonable									1		1
NSC1930	Ethical Standards	Mar-19	Reasonable											3
TOTALS				**1**	**13**	**0**	**0**	**0**	**0**	**0**	**1**	**12**	**0**	**17**
DMS Project and L&D Project														
NSC1804	L&D Skills	Jul-18	Limited								1	7		
NSC1707	Duty Management	Dec-16	Limited									3		
NSC1916	Duty Management	Nov-18	Limited									5		4
DMS Project and L&D Project Totals				**0**	**0**		**0**	**0**	**0**	**0**	**1**	**15**	**0**	**4**
TOTALS				**1**	**13**		**0**	**0**	**0**	**0**	**2**	**27**	**0**	**21**

KEY FINDINGS

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

   3.1 Allowances (NSC1912) – this is regarding revised policy and procedures for claiming dog handling allowances.

   3.2 L&D Skills (NSC1804) – this issue is around the skills data held by Learning and Development, this is being addressed as part of a project and business case to improve the way in which this is recorded, with expected implementation in September 2019.

4. A review of all outstanding recommendations was undertaken and revised deadlines applied in consultation with management, dependent on realistic progress and ability to implement the recommendations.

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

6. Duty Management recommendations are being addressed as part of a development project, estimated for completion in September 2019.

7. All recommendations are now being agreed and progressed with ACOs and DCCs, to improve response and progression.

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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.

- 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 Overdue – 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.

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

SCOPE AND LIMITATIONS OF THE REVIEW

8. 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.

9. 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.

10. 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.

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RELEASE OF REPORT

11.   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:	21st May 2019

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Detailed Report

FOLLOW UP

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

13.   The following matters were identified as either a revised deadline not yet reached or the original deadline has not been reached:

Job	Recommendation	Priority	Management Comments	Responsible Officer	Chief Officer	Due Date	Revised Due Date	Last Update	Latest Response
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	ACOs	30/06/17	01/12/19	04/01/19	The alignment of the policy and procedures will require additional time, to agree the interpretation of the requirements and the implications for officers.
NSC1812 Business Interests	Employment contracts be reviewed for staff that attend police funded courses to be	2	The policy has been revised to reflect setting restrictions on geographical area for working and on course	Senior Complaints, Appeals & Policy Manager	DCC	30/09/18	01/07/19	04/12/18	Work continues and progress has been made. Engagement has taken place

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	required to reimburse the Constabularies if they leave within set time periods of attending the course. As well as setting restrictions on working within a set geographical area for a given period.		reimbursement. Consideration is being given to including reimbursements within employment contracts and what would be enforceable. An implementation date of 30th September 2018 is provided for the consideration period, to ascertain whether this is feasible to fully implement.						with HR regarding employment law. Legal advice is required regarding the business interest policy, a revised version has been written and sent out for consultation.
NSC1814 Risk Management – Mitigating Controls	Controls on the strategic risk register be made specific, applying the 'so what' 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	ACOs	08/06/18	01/07/19	06/02/19	The risk register is going through a full review.
NSC1823 Overtime, Expenses and Additional Payments	Sample testing on 10% of claims to include the validity of the claim and whether they are submitted within the guidelines.	2	A sample of claims are checked for compliance with policy. With regards to the validity it had been agreed that through publication of the appropriate policy along with an potential	Head of Transactional Services	ACOs	30/09/18	01/07/19	04/01/19	This Audit report along with recent PSD issues raised has led to the conclusion the risks are higher than can be

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			disciplinary proceedings for non-compliance that the Constabulary would manage the remaining risk. iExpenses, does not identify duplicates and other information with regards to validity. A new reporting solution is now in place and being configured and an early priority is to design reports for Finance, PSD and Heads of Departments to manage this going forward.						tolerated and as a result has been added to the Constabulary risk register. The reporting tool is currently being developed and is anticipated to be complete for the new financial year 2019/20, following which testing will commence.

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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. 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	ACOs	30/06/18	01/07/19	04/01/19	Work has progressed to the extent that the new reporting tool is anticipated to be implemented by the end of Q1 in 2019/20, with reporting availability following this.
NSC1901 Strategic Control, Corporate Governance and Whistleblowing	A police bonus and honorarium policy be developed or incorporated into an existing staff policy, and made available to staff to refer to.	2	Work has commenced on the development of an Honorarium and Bonus policy. This will be subject to the normal consultation process.	Policy, Reward and Employee Relations Manager	DCC	30/09/19		13/03/19	

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NSC1901 Strategic Control, Corporate Governance and Whistleblowing	A form be developed for each member of the selection / promotion panel, requiring them to formally declare whether there are any potential conflicts of interest in relation to the recruitment process.	2	Action will be taken to add this detail to the shortlisting form and interview paperwork which is currently carried out by line managers. Before this is introduced, work will be undertaken to ensure that there is process to follow when a conflict is identified as well as ensuring that there is an available understanding of what is regarded as a conflict of interest for managers.	Head of HR	DCC	30/06/19		13/03/19	
NSC1901 Strategic Control, Corporate Governance and Whistleblowing	HR to develop and maintain a conflicts of interest register in relation to recruitment and promotion exercises.	2	The forms outlined above will be held within HR, so that they can be referred to in case of any investigation into a recruitment process.	Head of HR	DCC	30/06/19		13/03/19	

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NSC1906 Enact Replacement Project	Management to ensure that a local installation of the Apex development tool is completed as soon as possible so that the relevant forms and other tools that are to replace the Enact system can be developed and implemented in a timely manner.	2	Apex has been installed onto our test database to allow development to begin. Some minor configuration is being finalised this week. Whilst this development is underway, Apex will be installed into our change controlled environment and production environment databases. This will not affect the forms development as these can be extracted from the test database and uploaded into each of the new environments without the need to recreate the whole form.	Toni Osborne ERP Systems and Development Manager	ACOs	23/11/18	01/06/19	03/01/19	The installation of APEX has been on-going since December. Issues are causing large trace files to be produced within the test environments. This issue has been resolved and once testing is completed, we will look to install APEX into Production which will be followed by iForms being loaded into APEX after confirmation of the successful installation.

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NSC1909 Key Financial Controls	A designated administrator be assigned to undertaken regular reviews of staff access rights on ERP to ensure that access rights are appropriate.	2	A review of ERP access rights to be undertaken by the ERP team. A designated administrator to be assigned upon the development of the Shared Service Transaction Centre. The requirement for a designated administrator for the ERP system to be included within the Shared Service Transaction Centre Business Case.	Head of Transactional Services	ACOs	31/03/20		20/05/19	
NSC1909 Key Financial Controls	A flagging system be developed to identify /Iforms that are not being processed promptly by Line Managers so that these can be escalated accordingly.	2	A solution will be implemented upon "Go-Live". The nature of this will develop as the IForms project continues.	HR Service Centre Manager	ACOs	30/09/19		20/05/19	

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NSC1909 Key Financial Controls	Staff raising retrospective purchase orders be reminded that purchase orders are to be raised in advance of procuring of goods/services.	2	The Assistant Chief Offices will formally notify heads of department that it is not acceptable for purchase orders to be raised retrospectively.	Head of Transactional Services	ACOs	30/06/19		20/05/19	
NSC1910 Capital Programme	Business case template documentation be used consistently across both forces for all capital bids, to ensure consistency of information presented and decisions made and recorded.	2	The PMO are currently reviewing the Business Case template for re-design for a consistent template that captures all relevant information to prioritise projects and evaluate how they are contributing to strategic priorities, thus enabling a check on benefits realisation, post implementation review etc. As key stakeholders Finance, HR and ICT will be consulted on along with PM and other internal department resources.	Head of Programme Management Office	ACOs	30/04/19	30/06/19	12/11/18	The rollout of the business case template is progressing alongside departmental restructure.

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NSC1912 Allowances	The policy and processes for dog handler allowances and associated expenses to be clarified, adopted within the policy, communicated to relevant staff/officers and accurate records maintained.	1	This will be referred to the Superintendent Specialist Operations, who will form a policy and process.	Supt Specialist Ops	ACOs	31/03/19	31/12/19	14/11/18	The alignment of the policy and procedures will require additional time, to agree the interpretation of the requirements and the implications for officers.
NSC1912 Allowances	A standard approach be adopted regarding the use of forms for claiming allowances. This is to be incorporated within guidance for staff and available on the intranet.	2	The content of the Payroll and HR Intranet pages are under review as part of the SSTC project. Forms will be loaded onto the intranet for staff to use and the teams will direct them to use the appropriate form. Future developments of forms on line will follow.	Head of Transactional Services	DCC	31/03/19	30/06/19	14/11/18	The SSTC Project Board have reviewed the content on the HR and Payroll On Line new Intranet pages and this will be live by 30 June 2019. The claim forms referred to are included on these pages.

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NSC1912 Allowances	The process and methodology be reviewed for making honorarium payments, to enable transparency and compliance with Constabularies' policy.	2	A Joint Good Work Recognition Policy is being developed. The policy will standardise the process for honorariums.	Policy , Reward and Employee Relations Manager	DCC	31/03/19	30/09/19	14/11/18	Work has commenced on the development of an Honorarium and Bonus policy. This will be subject to the normal consultation process.
NSC1915 Establishment, Capacity, Recruitment and Retention	The setting up of IT profiles at least a week in advance of the new starter commencing employment be investigated, so that the profile can be checked to ensure that it works. IT to provide the new starter with their password on the day that they start.	2	This is an issue that the business has highlighted since the launch of the ERP solution. The ERP System Team/ICT have advised that the Sailpoint Solution, which will be implemented as part of the Desktop Modernisation Project will address this issue. An update will be provided in due course.	ERP Systems Team/ICT	ACOs		30/09/19	12/03/19	

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NSC1915 Establishment, Capacity, Recruitment and Retention	Reports of amendments to contracts length be produced monthly, to verify whether leaving / extended and permission groups checked for appropriateness to amend.	2	The provision of reports will be scoped by the Management Information Team, and if possible, will be reviewed monthly by HR Business Partners/HR Advisors.	Head of Resourcing/ Head of HR	ACOs	30/06/19		12/03/19	
NSC1915 Establishment, Capacity, Recruitment and Retention	Approval and rationale for why officers and staff are acting up be recorded for all officers/staff.	2	The new Acting and Temporary Promotions Policy will be published in the Spring of 2019. This will standardise the process and this detail will therefore be captured. Staff are already covered within other HR policies and process.	Head of Resourcing	ACOs	30/06/19		12/03/19	
NSC1915 Establishment, Capacity, Recruitment and Retention	The workforce plan be amended so that agency staff are included, to accurately reflect vacant posts and staffing levels.	2	The document will include details related to Agency Staff from the start of the new financial year.	Senior Recruitment and Workforce Planning Manager	DCC	31/05/19		12/03/19	

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NSC1917 Vetting	The vetting renewals backlog be cleared in order that renewal vetting is done in a timely manner.	2	Due to resource pressures, new force applicants and increase in the level of checks to be undertaken on each applicant, the backlog has gained pace. The team are running with one post down and no applicants applied to the first advert, this has gone out to advert again. The post will need to be resourced before this can be progressed. There are three temporary roles that finish on 31st March 2019, however this is unlikely to be met by then. If resource issues can be resolved it would still put back implementation by at least six months after the original deadlines. Other ways to process these are being investigated. A business case around web forms	Senior Complaints, Appeals and Policy Manager	DCC	31/12/19		22/11/18	

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			has been prepared which would help the process.						
NSC1917 Vetting	The Vetting Policy be reviewed, approved, and communicated.	2	The existing policy has been withdrawn as non-compliant. Now working to a seven force policy in line with APP, with local guidance. Once the national guidance is produced in September 2018, the seven force approach will be agreed and local guidance produced on this basis.	Senior Complaints, Appeals and Policy Manager	DCC	31/03/19	30/06/19	22/11/18	The policy is being discussed between PSD and HR, regarding the elements of reimbursement within employment contracts and what would be enforceable by law, following which consideration is to be made by Unison and the Federation, along with both Executives. This requires additional time to resolve.

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NSC1922 Stations, including building access and vehicle security	A review be undertaken of the Great Yarmouth police station security arrangements, including changing of locks when staff leave the station.	2	A programme to roll out site lock boxes, to store site keys for sign in/out is in progress as an interim measure to improve security, this is expected to be completed by 31/12/2018. A programme is also in place for replacing locks with salto access, this is ongoing across 2018 and 2019, with the expected completion date for all sites by 31/12/2019.	The Joint Information Security and Estates and Facilities departments	ACOs	31/12/19		03/10/18	
NSC1922 Stations, including building access and vehicle security	A review of officers that have access to the Bury St Edmunds armoury be undertaken to ensure that only officers that have current in date fire arms training and require access are able to access the armoury.	2	Firearms Officers use the Chronical application to access the armoury and the contents contained in it. e-Personnel files need to be updated to reflect the officers' current training status. ERP does not have an accurate record of officers that have	The Joint L&D and The Joint Information Security Dept	DCC	30/11/18	01/10/19	12/11/18	The Chronicle solution is now being re-configured to become a 7Force 'cloud hosted' application that all 7Forces access. This is to be built and hosted by

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			undertaken firearms training. Work is underway to address the inaccuracies of records within ERP. Only officers that have undertaken firearms training are granted access to the armoury, it is the training records on ERP being incorrect.						Suffolk and Norfolk ICT in their DC. Integrating ERP records etc. will be included in the development of this new application. A revised date will be applied to assess progress of the application to address the risk of unauthorised officers having access.

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NSC1929 Lone Working	A central record of all lone working roles be maintained.	2	HR Records, e.g. job description profiles spreadsheet could be used to capture roles where lone working is likely or will occur. Matter to be raised at Joint Health and Safety Committee, and upward referral to People Board.	Health & Safety Manager	DCC	01/07/19		19/10/18	
NSC1929 Lone Working	A more thorough check of risk assessments be conducted, at least on a sample basis, to ensure that all risks, including those relating to lone workers have been identified and appropriate controls measures have been put in place.	2	Heads of Department are responsible for health and safety risk assessments. Line Managers/Commanders are also expected to ensure that risk assessments are in place and this includes identifying and ensuring that persons who are lone workers have specific control measures in place where a hazard and risk to them exists for lone working. The Health and Safety Team undertake	Health and Safety Manager / Advisors	DCC	01/11/18	01/07/19	19/10/18	A template form has been produced but due to the reduction of 1 FTE H&S Advisor this has not yet been actively used due to workloads. When a part time admin person starts the remaining H&S Advisors will be in a position to use

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			periodic reviews of risk assessments and this is recorded via our monitoring spreadsheet. The Health and Safety Team provides support and guidance to the Constabularies on complying with health and safety legislation. The Health and Safety Advisors have an objective to 'audit' risk assessments more thoroughly and a template form to support this process has been designed.						the audit form and where practicable audit lone working arrangements.

The Health and Safety Team are actively ensuring that lone working is captured in risk assessments where it is considered to be a significant hazard. |

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NSC1930 Ethical Standards (Relationships Conduct)	Guidance be developed on personal relationships at work. The guidance should incorporate managing staff within close relationships at work where potential conflicts may arise.	2	The NPCC issued draft guidance for informal feedback in July 2018. Further national consultation then took place before a joint NPCC and College of Policing guidance document was published w/c 18/02/19 and is available on the COP website. Local discussions are now taking place to implement and raise awareness.	Head of ACU	DCC	01/07/19		13/03/19	

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NSC1930 Ethical Standards (Relationships Conduct)	A standard form be developed for police staff and police officers to disclose a personal relationship at work, which is submitted to PSD for review and identification of any conditions to be imposed to manage any identified risk.	2	The NPCC issued draft guidance for informal feedback in July 2018. Further national consultation then took place before a joint NPCC and College of Policing guidance document was published w/c 18/02/19 and is available on the COP website. Local discussions are now taking place to implement and raise awareness.	Head of ACU	DCC	01/07/19		13/03/19	

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NSC1930 Ethical Standards (Relationships Conduct)	A register be developed for recording all staff personal relationships at work, which is maintained by the Professional Standards Department (PSD) and updated accordingly.	2	The NPCC issued draft guidance for informal feedback in July 2018. Further national consultation then took place before a joint NPCC and College of Policing guidance document was published w/c 18/02/19 and is available on the COP website. Local discussions are now taking place to implement and raise awareness, prior to publication.	Head of ACU	DCC	01/07/19		13/03/19	