

**ORIGINATOR: TIAA (INTERNAL AUDITORS)**

**PAPER NO: AC24/08**

**SUBMITTED TO: AUDIT COMMITTEE – 15 MARCH 2024**

**SUBJECT: SUMMARY INTERNAL CONTROLS ASSURANCE (SICA) REPORT 2023/24**

**SUMMARY:**

1. The summary report provides an update on the progress of internal audit. The report is based on internal audit work carried out by TIAA and management representations that have been received during the period since the last progress report.
2. The follow up of internal audit recommendations undertaken by TIAA is undertaken throughout the year and reported to the Audit Committee during the year at each meeting.

**RECOMMENDATION:**

1. The Audit Committee is requested to consider the attached report.



Internal Audit

FINAL

Office of the Police and Crime Commissioner  
for Suffolk and Chief Constable of Suffolk  
Constabulary

Summary Internal Controls Assurance (SICA) Report

2023/24

March 2024

# Summary Internal Controls Assurance

## Introduction

1. This summary controls assurance report provides the Audit Committee with an update on the emerging Governance, Risk and Internal Control related issues and the progress of our work at the Office of the Police and Crime Commissioner for Suffolk and Chief Constable of Suffolk Constabulary as the 6<sup>th</sup> March 2024.

## Tackling and Managing Fraud Risks

### 2. The Challenge

Everyone is under increasing financial pressure from the escalating costs of goods and services and increasing inflation leading to the current cost-of-living crisis. The knock-on effects of the pandemic, and the increase in remote working practices, linked with the escalating cost of living has increased the risk of opportunistic fraud against organisations. All organisations are at risk and will be targeted where weaknesses are identified. It is at times such as these where organisations have unfilled vacancies, positions filled by temporary employees, or where existing employees may be struggling with financial or emotional wellbeing that all organisations need to be more aware of the risks and take steps to keep their money, people and data safe.

Recently reported data shows that how some organisations in the UK have been affected by fraud over the last year and how they perceive their fraud risk.

**58% - think the risk of fraud is going to increase over the next 12 months.**      **55% - of reported frauds were perpetrated by staff or volunteers.**  
**40% - said hybrid working has increased the risk of fraud.**                      **69% - experienced financial loss due to fraud.**

**Recommended Actions:** To ensure your organisation is addressing this risk and putting in place measures to combat fraud risk, TIAA recommend that several key steps are taken to assess your organisation's exposure, ensure controls are effective and to safeguard should the worst happen.

- **Assign Responsibility:** to a suitably trained employee/Board Member to act as your organisation's Fraud Champion.
- **Train:** Line Managers and Board Members, on fraud risk awareness and managing concerns and, all employees on emerging fraud risk awareness.
- **Govern the risk:** by ensuring your organisation had developed a clearly written Anti-Fraud Policy and Response Plan.
- **Raise Awareness:** with all employees and Members of their responsibilities to protect your organisation's assets.
- **Identify and Record:** the specific types of fraud that are perceived to be a risk to your organisation and what steps are required to manage these.
- **Compliance Test:** at regular intervals, how well your recorded fraud prevention controls are working.
- **Undertake Checks:** on any individual or organisation with whom you have a financial relationship.

### TIAA's Proactive Fraud Risk Reviews

TIAA recognises that all sectors and all organisations are susceptible to fraud and is able to provide support in helping ensure your employees are aware of their responsibilities and specific risks facing your organisation. We have also developed a series of reviews that are designed to provide your organisation with external assistance in achieving compliance with our key recommended actions and to provide your Board with assurance over key fraud risk areas.

**Audits completed since the last SICA report to the Audit Committee**

- 2. No final reports have been issued since the last Audit Committee meeting.

**Audits currently in draft**

- 3. The table below lists the audits that are currently in draft and have been a draft for a while and are due to be reported as final to the next audit committee meeting.

Review	Draft issued	Comments
Firearms Management and Training	6 <sup>th</sup> December 2023	
Subscriptions	8 <sup>th</sup> December 2023	
Sustainability	5 <sup>th</sup> January 2024	
Grievance Reporting	22 <sup>nd</sup> January 2024	
Ill Health Retirement	30 <sup>th</sup> January 2024	
Community Safety Partnership (Norfolk OPCC only)	9 <sup>th</sup> February 2024	
Agile Working	13 <sup>th</sup> February 2024	
Firearms Licensing	6 <sup>th</sup> March 2024	

**Progress against the 2023/24 Annual Plans**

- 4. Our progress against the Annual Plan for 2023/24 is set out in Appendix A.

**Changes to the Annual Plan 2023/24**

- 5. There has been one further change proposed to the 2023/24 internal audit plan since the last audit committee meeting. Management have requested the Change Management audit to be postponed into 2024/25. This is due to the current external consultation to reconfigure the department, with a proposal to undertake the audit on completion of this and a bedding in period.

**Progress in actioning priority 1 & 2 recommendations**

6. We have not made any Priority 1 recommendations (i.e. fundamental control issue on which action should be taken immediately) since the previous SICA. There are no outstanding Priority 1 recommendations and eight Priority 2 recommendations overdue. More information is provided in Appendix B.

#### **Frauds/Irregularities**

7. We have not been advised of any frauds or irregularities in the period since the last SICA report was issued.

#### **Responsibility/Disclaimer**

8. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. The matters raised in this report not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

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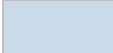
## Progress against Annual Plan

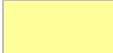
System	Audit Days	Planned Quarter	Current Status	Comments
22/23 Risk Management	10	4	Final report	
22/23 Local Procurement including compliance with standing orders	10	4	Final report	
22/23 Overtime and Additional Allowances	14	4	Final report	
23/24 Expenses	8	1	Final report	
23/24 Business Interest, Secondary Employment and Declaration of Interest	12	1	Final report	
23/24 Fuel Usage and Security of Fuel Cards	12	1	Final report	
23/24 Business Continuity	12	1	Final report	
23/24 Planned and Preventative Estate Maintenance	12	2	Final report	
23/24 Firearms Management and Training	12	2	Draft report issued 6 <sup>th</sup> December	Private report
23/24 Subscriptions	8	3	Draft report issued 8 <sup>th</sup> December	
23/24 Sustainability	12	3	Draft report Issued 5 <sup>th</sup> January	
23/24 Grievance Reporting and Management	12	3	Draft report issued 22 <sup>nd</sup> January	
23/24 Ill Health Retirement	10	2	Draft report issued 30 <sup>th</sup> January	
22/23 Agile Working	10	2	Draft report issued 13 <sup>th</sup> February	
22/23 Firearms Licensing	10	3	Draft report issued 5 <sup>th</sup> March	Private report
22/23 Community Safety Partnership	12	3	Draft report issued	Norfolk OPCC only – Private report
22/23 Succession Planning	10	2	Quality review for draft report issue	


23/24 Staff Appraisals	12	2	Quality review for draft report issue	
22/23 Commissioners Grants	10	2	Quality review for draft report issue	
22/23 Security of Seized Proceeds of Crime (Cash and Assets)	10	2	Quality review for draft report issue	Private report
22/23 Resource Management Unit	10	3	Quality review for draft report issue	Delays due to teams involved and working patterns across teams. Debrief held w/c 4 <sup>th</sup> March
22/23 Vetting	10	4	Fieldwork in progress	Fieldwork in progress, debrief w/c 11 <sup>th</sup> March
23/24 Data Quality	12	3	Fieldwork in progress	Delays due to working patterns. Fieldwork in progress, debrief w/c 11 <sup>th</sup> March
23/24 Out of Court Disposals (OOCs)	12	3	Fieldwork in progress	Private report
23/24 Procurement Strategy and Compliance	12	3	Fieldwork in progress	Delays due to involvement of 7F, ICT, Estates, Transport and Uniforms for contract selection.
23/24 Key Financial Controls	16	4	Fieldwork in progress	Debrief expected by 31 <sup>st</sup> March
23/24 Absence Management including Limited Duties	16	3	Fieldwork in progress	Audit moved to quarter 4 at the request of management, start date agreed 18 <sup>th</sup> February
23/24 Culture and Required Behaviour	12	4	Fieldwork in progress	Fieldwork commenced 9 <sup>th</sup> January
22/23 ICT Cyber Security Maturity	12	3	In progress	Audit days from the 2022/23 have been transferred to the 2023/24 audit so that in-depth 23/24 internal audit can be undertaken.
23/24 New E-recruitment systems	12	3	In progress	Fieldwork commenced
23/24 Risk Management	10	4	Scheduled	The audit is proposed to commence 21 <sup>st</sup> March
22/23 Data Protection / Freedom of Information	12	2	Scheduled	Transferred from the 2022/23 internal audit plan, paused due to data breach
23/24 Fleet Management Strategy	12	4	Scheduled	It has been requested that the audit is undertaken in quarter 4 of the financial year due to the fleet management strategy being reviewed.
22/23 ICT Strategy combined with ICT Project Management	22	2	Scheduled	Postponed until 14 <sup>th</sup> March.


22/23 System ERP / Enact / DMS / Chronicle Interface	12	2	Audit scoped	Transferred from the 2022/23 internal audit plan
22/23 Change Management	11	3	Proposed postpone to 24/25	Transferred from the 2022/23 internal audit plan. Requested postponing due to Change Consultants review
Follow Up	10	All		
Annual Planning	1	All		
Annual Report	1	All		
Audit Management	15	All		
<b>Total b/fwd Days</b>	<b>173</b>			
<b>Total 2023/24 Days</b>	<b>275</b>			

**KEY:**

 To be commenced

 Site work commenced

 Draft report issued

 Final report issued



## Recommendations Updated as at the 5<sup>th</sup> March 2024

### Recommendations Summary

Audit	Implemented since last Audit Committee	Not due	Overdue	Comments
23/24 Business Interest, Secondary Employment & Declaration of Interest	1		1	
22/24 Key Financials		1		
23/24 Planned and Preventative Estates Maintenance		2		
22/23 Risk Management		2	3	
20/21 NSC2128 Recruitment			2	
21/22 Dog Handling			2	
21/22 Establishment, Capacity, Recruitment & Retention			2	
21/22 Absence Management with Limited Duties			1	
22/23 Fuel Usage and Security of Fuel Cards	2			
<b>Total Recommendations</b>	<b>3</b>	<b>5</b>	<b>11</b>	

**Recommendations implemented since the last Audit Committee meeting:**

Audit	Recommendation	Priority	Management Comments	Original Due Date	Responsible Officer	Progress
Business Interest, Secondary Employment & Declaration of Interest	Officers and staff be reminded of their responsibilities in respect of business interests, in particular the requirement to update PSD if there are any changes.	3	A reminder will be added to the learning times publication in August 2023. Also completing an internal audit of older BI's to establish if they are still active.	28/02/24	Ps CHAPMAN	4 Update 29/02/24. A special edition of the learning times was produced in August 2023, highlighting the need to notify PSD of any changes to BI's. The internal audit requirement to remove records relating to ex-employees was also completed.
Fuel usage and security of fuel cards	Use the data provided by Allstar in a targeted manner to address issues with users not choosing the most economical means of refuelling, for example not using bunkered fuel when this is an option or using branded petrol stations rather than supermarkets.	3	Agree with the auditor's findings. Both AllStar and inhouse data is available to analyse and proactively target opportunities to reduce future fuel spend. Monthly reports will be forwarded to Policing Commanders and Departmental Heads identifying those transactions where a more cost-effective alternative refuel was available. This will be escalated where required. Consideration to Force Orders. 60 Second Briefing, vehicle logbook wording etc will also be given.	30/11/23	Head of Transport and Uniform	This has been addressed, the data is being used for further analysis.
Fuel usage and security of fuel cards	Vehicle users to be reminded of the need to provide odometer reading when refuelling, and reports to be run to identify where vehicle users are not providing odometer readings so that they can be chased up accordingly.	3	Agree with the auditor's findings. Monthly reports as detailed at 1. above will include a section for transactions where odometer readings are not provided by the vehicle user. It should be noted that telematics provides real-time odometer readings.	30/11/23	Head of Transport and Uniform	This has been addressed, reminders have been issued and reports are being run to identify non-compliance.

The following table lists the recommendations that are not yet due:

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
Key Financials	Checks be completed for Norfolk accommodation costs booked with Agiito.	3	<i>The accommodation booking process and accounting of those costs will be reviewed for Norfolk.</i>	31/03/24		Head of Finance / Head of Transactional Services	N/A
Planned and Preventative Estates Management	Appropriate agreed procurement arrangements to be complied with. Contracts to be agreed with appropriate contractors to enable deliver of the estates planned, preventative and estates maintenance contractors.	2	<i>Accepted, this will be raised with the seven-force procurement team to ensure that appropriate procurement arrangements are followed.</i>	31/03/24		Joint Head of Estates and Seven Force Procurement	N/A
Planned and Preventative Estates Management	The use of single tender action forms to be reduced and contract to be tendered appropriately.	2	<i>Accepted, we will work with the seven-force procurement team to ensure that appropriate procurement arrangements are followed an this should lead to reduction in single tender action forms.</i>	31/03/24		Joint Head of Estates and Seven Force Procurement	N/A
Risk Management	The definition of the Constabularies risk appetite, as well as the Constabularies risk appetite itself be updated. Going forward the overarching and specific risk appetite to be reviewed annually as part of the strategic planning and annual outcome-based budgeting process.	2	<i>This will be reviewed and updated as part of the Risk Management Policy and procedure review, due in December 2023. This will be taken forward as part of the wider FMS and OBB annual planning processes that feeds into SPM.</i>	30/04/24		Organisational Change Management and Risk Manager	N/A

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
Risk Management	Agreed mitigating actions to include a date by which the action be completed, to ensure that the risk is managed in a timely manner.	3	<i>This will be included in the procedure document once reviewed. The Risk Manager will also start to embed this practice through consultation / engagement and a review of training materials (linked to policy and procedure review).</i>	30/04/24		Risk Manager	N/A

The following table lists the recommendations that are overdue:

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
Business Interest, Secondary Employment & Declaration of Interest	Review the arrangements for cover in the absence of the Business Interest Administrator, including training for other members of staff within the team and preparing procedure notes/guidance on the key parts of the process.	2	<i>Agreed that resilience is an issue with regards to processing business interests. Plan to upskill PSD Administrator. Detailed process maps will also be devised.</i>	28/02/24		PSD	<i>Update 23/02/24. The PSD administrator has not been upskilled due to a change in her role / responsibilities. The resilience of the role is being reviewed by the head of department, with plans for the service improvement team to be integrated into the Anti-corruption unit. The aim is to add significant resilience to the team by upskilling other analysts in ACU to be able to perform the basic BI functions. We now have detailed guides for BI administration. These are stored centrally on the W drive.</i>
Recruitment	A recruiting of police officer policy be produced and made accessible.	2	<i>The production of this policy remains a key priority, but the key dependencies (the introduction of PEQF and the OLEEO E-</i>	30/06/22	<i>30/04/23 &amp; 30/06/23 &amp; 31/03/24</i>	<i>Head of Resourcing</i>	<i>The policy is being reviewed to take into account changes that are being brought in following the implementation of OLEEO. The Constabularies are implementing a</i>

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
			<p>Recruitment System) remain outstanding. The Implementation Date therefore takes these into account.</p>		<p><b>Requesting</b> 30/06/24</p>		<p>new recruitment system. The OLEEO project has been delayed, the policy will be amended to reflect revised changes that are required following implementation of OLEEO.</p> <p><b>Revised due dates have been approved by the last audit committee and a further revised date is requested.</b></p>
Recruitment	<p>The recruiting of police staff policy be reviewed to ensure that it reflects current legislation.</p>	2	<p>As stated within the finding, this has been delayed by the expected implementation of the new e-recruitment system. The review will take place as soon as implementation allows.</p>	30/06/22	<p>30/04/23 &amp; 30/06/23 &amp; 31/03/24 <b>Requesting</b> 30/06/24</p>	<p>Head of Resourcing</p>	<p>The policy is being reviewed to take into account changes that are being brought in following the implementation of OLEEO. The Constabularies are implementing a new recruitment system. The OLEEO project has been delayed, the policy will be amended to reflect revised changes that are required following implementation of OLEEO.</p> <p>The policy is going to JNCC on 05/06/24, with publication expected following this.</p> <p><b>Revised due dates have been approved by the last audit committee and a further revised date is requested.</b></p>
Police Dogs	<p>A designated system to be used for police dogs.</p>	2	<p>We currently record dog deployments via officers submitting records monthly. We are seeking SBOS assistance to capture some of this data from STORM however Chronicle will also be able to capture and record deployments however this will still need submissions of data by</p>	30/11/23	30/04/24	<p>Dog Inspector</p>	<p>Work is progressing to get this addressed, consultation across 7 forces members has commenced. Officers do still submit monthly returns and there has been some updates from SBOS but not totally automated as yet.</p> <p>There is a draft consultation for the police dog app, which doesn't stipulate the use of</p>

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
			<i>officers to Chronicle inputters. Which may require uplift of staff in the future.</i>				<i>a system such as Chronicle so whilst this may come it is not mandated.</i>
Police Dogs	Use of chronicle to be explored for recording of police dog handlers training.	2	<i>Very recently the authoring officer of the forthcoming Police Dogs APP has posed to the region would we want Chronicle for dogs. From N&amp;S I have replied positively but am at this point unaware on the whole regional response, but I believe it was a very positive acceptance of Chronicle being introduced. Once this is agreed regionally procurement will source as a region and then I will work towards implementation with L&amp;D who are expanding the modules on Chronicle for other areas of business.</i>	30/11/23	30/04/24	Dog Inspector	<i>Work is progressing to get this addressed, consultation across 7 forces members has commenced. Regionally there are differing views on this, across all areas of policing. It may be that initially alternative methods continue to record the training requirements until the APP has been embedded and then we look at investment into the Dog Module on Chronicle.  With regards to dog handler performance measures this is continued ongoing work with SBOS leading on it.</i>
Establishment, Capacity, Recruitment and Retention	A trajectory to be developed to support the resourcing team to be multi-disciplinary and able to undertake both police officer and police staff recruitment.	2	The team will move to a multifunctional model on launch of e-recruitment system OLEEO, for efficiency it felt reasonable to prevent training in two separate processes, current and future, given impending launch. Training on OLEEO will be across the whole department, ensuring a multidisciplinary team that are able to respond to meet changes in demand.	30/09/23	31/03/24	HR Manager	<i>Delayed due to the OLEEO system implementation.</i>

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
Establishment, Capacity, Recruitment and Retention	KPIs to be developed for recruitment and progress against these formally monitored.	3	KPIs to be implemented as part of OLEEO delivery. To create realistic and achievable targets, we will need to understand process speeds within the new system before setting these.	30/09/23	31/03/24	HR Manager	Delayed due to the OLEEO system implementation.
Absence Management	The limited duties policy to be finalised and made accessible to all.	2	Agreed, this will be addressed. The police is out for consultation. Once reviewed the policy will be made accessible.	30/09/23	30/06/24	HR Manager	The policy is currently out for consultation. This is anticipated to be published following JNCC on 05/05/24.
Risk Management	The Joint Norfolk and Suffolk Risk Management Policy and Procedure be reviewed and updated in light of good practice and aligned with the Corporate Governance Framework. The Risk Management Policy be expanded to include a clear definition of Risk Management, Risk Identification, Risk Assessment the mechanism by which risk is categorised, the use of Risk Appetite in managing the Constabulary business and the Committee roles in overseeing risk management. In addition, the following are to be included within the policy/procedures, An Executive Lead be identified for Risk Management. A summary of the alignment process with the annual statements. The process for reviewing and moderating risks to ensure consistency. The process for reviewing risks for escalation and/or aggregation onto the Strategic Risk Register. The process for	2	Accepted in part. The policy and procedure will be updated in line with its review deadline (December 2023) to reflect the enhanced practices we now have in place. Definitions are already included within the documents, so we do not fully accept this part of the recommendation. We agree that the list of “areas to be included” will be reviewed and considered as part of the policy and procedure refresh outlined above. The Risk Management policy and procedure are scheduled to be reviewed and revised before the current December 2023 deadline. All the changes requested to the policy procedures noted will be	31/12/2023		Risk Manager	Update imminent.

Audit	Recommendation	Priority	Management Comments	Original Due Date	Revised Due Date (s)	Responsible Officer	Latest update
	closing risks. Detail of where oversight and scrutiny of management of risks is undertaken to reflect current practices.		reviewed and included within the new documents.				
Risk Management	Dates of updates are included on all risk register entries, and risk register updates be provided monthly as per the guidance.	3	Accepted in part. Risk Manager to review R&Is and ensure dates are included on an ongoing basis. However, we are happy to accept that some low scored risks may not be updated monthly and therefore we will make sure the RM policy and procedure guidance reflects this.	31/12/2023		Risk Manager	Update imminent.
Risk Management	Controls and assurances be listed separately. Performance outcome measures be included and updated regularly to support reporting on assurance on the SRR.	32	Accepted in part. There is further adaption required to both Forces SRRs in light of new priorities and plans that are now in place. As part of that work we will work with Chief Officers to show controls and assurances separately. Not accepted. This is a much wider piece of work and will create a significant increase in demand. At present we do not have capacity to take this extra work on but is something we will keep in mind.	31/12/2023		Risk Manager	Update imminent.



**Priority Gradings (1 & 2)**

1	URGENT	Fundamental control issue on which action should be taken immediately.
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2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.
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3	ROUTINE	Control issue on which action should be taken.
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