



**Enquiries to:** #JAC

**Telephone:** (01278) 646188

**E-mail:** [JAC@avonandsomerset.pnn.police.uk](mailto:JAC@avonandsomerset.pnn.police.uk)

**Date :** 16th January 2022

**To: ALL MEMBERS OF THE JOINT AUDIT COMMITTEE**

- i. David Daw, Jude Ferguson (Chair), Zoe Rice, Martin Speller
- ii. Chief Constable ("CC"), CFO for CC and Relevant Officers
- iii. The Police & Crime Commissioner ("PCC")
- iv. The CFO and CEO for the PCC
- v. External and Internal Auditors

Dear Member

## **NOTICE OF MEETING**

You are invited to a meeting of the **Joint Audit Committee** to be held virtually **via Teams** at **09:30** on **24<sup>th</sup> January 2023**.

The agenda for the meeting is set out overleaf.

Yours sincerely

**Alaina Davies**  
**Office of the Police and Crime Commissioner**

## INFORMATION ABOUT THIS MEETING

- (i) Car Parking Provision

N/A – virtual meeting

- (ii) Wheelchair Access

N/A – virtual meeting

- (iii) Emergency Evacuation Procedure

N/A – virtual meeting

- (iv) If you have any questions about this meeting, require special facilities to enable you to attend. If you wish to inspect Minutes, reports, or a list of the background papers relating to any item on this agenda, please contact:

Office of the Police and Crime Commissioner  
Valley Road  
Portishead  
BS20 8JJ

**Telephone:** 01278 646188

**Email:** [JAC@avonandsomerset.pnn.police.uk](mailto:JAC@avonandsomerset.pnn.police.uk)

- (v) REPORT NUMBERS CORRESPOND TO AGENDA NUMBER

## **AGENDA**

**24<sup>th</sup> January 2023, 09:30 – 13:30**

**Meeting to be held via Teams**

**Timings are listed below as a rough guide only**

**1. Apologies for Absence**

**2. Emergency Evacuation Procedure**

The Chair will draw attention to the emergency evacuation procedure in the Information About This Meeting above.

**3. Declarations of Gifts/Offers of Hospitality**

To remind Members of the need to record any personal interests or any **prejudicial interest** relating to the agenda and disclose any relevant receipt of offering of gifts or hospitality

**4. Public Access**

(maximum time allocated for this item is 30 minutes)

Any member of the public wanting to attend a JAC meeting must submit a written application and secure written agreement of the JAC Chair. Statements and/or intentions to attend must be received no later than 12.00 noon on the working day prior to the meeting and should be emailed to

[JAC@avonandsomerset.pnn.police.uk](mailto:JAC@avonandsomerset.pnn.police.uk)

The JAC Chair reserves the right to refuse or suspend access if there is any security risk to the public or a member of the public's behaviour is disruptive in any manner. A member of the public may only address the meeting, for a maximum of five minutes, where a statement has been previously provided to the JAC Chair and prior sanction has been granted.

**5. Minutes of the Joint Audit Committee Meeting (Report 5) 09:30**

**a) 11<sup>th</sup> October 2022**

**b) 7<sup>th</sup> November 2022**

**6. Office of the Police and Crime Commissioner Strategic Risk Register (Report 6) 09:40**

**7. Constabulary Strategic Risk Register (Report 7) 09:55**

**8. Business from the Chair (Report 8) 10:10**

**a) Governance and Scrutiny Board (Verbal Update)**

**b) Update on IOPC Investigations (Verbal Update)**

**9. Internal Audit (Report 9)**

**a) SWAP Quarterly Update 10:30**

**BREAK 10:50 – 11:00**

**b) Policy and Procedure Management Audit Report 11:00**

**c) Risk Management Follow Up Audit Report 11:20**

**d) Complaints Handling Follow Up Audit Report 11:40**

**10. External Audit (Report 10) Reports to follow**

- a) Progress Report 12:00
- b) Auditors Annual Report 12:20

## **Part 2**

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**Items for consideration without the press and public present**

- 11. **Exempt Minutes of the Joint Audit Committee Meeting**
  - a) held on 11<sup>th</sup> October 2022 (Report 11) 12:40

**MINUTES OF THE JOINT AUDIT COMMITTEE (JAC) MEETING HELD ON TUESDAY 11<sup>TH</sup> OCTOBER 2022 AT 13:00. MEETING HELD VIA TEAMS.**

**Members in Attendance**

Jude Ferguson (Chair)  
Zoe Rice  
Martin Speller  
David Daw

**Officers of the Constabulary in Attendance**

Sarah Crew, Chief Constable  
Nikki Watson, Deputy Chief Constable  
Nick Adams, Constabulary CFO  
Michael Flay, Governance and Risk Manager  
Emma Snailham, Corporate Business Partner Financial (part of the meeting)  
Glen Bremner, Firearms Licencing Manager (part of the meeting)  
Jessica Hardie, HR Business Partner – Talent Acquisition (part of the meeting)  
Rebecca Roberts, Assistant HR Business Partner (part of the meeting)  
Abby Rollings, Inspection and Audit Lead (part of the meeting)

**Officers of the Office of the Police and Crime Commissioner (OPCC)**

Alice Ripley, OPCC Chief of Staff  
Paul Butler, OPCC CFO  
Ben Valentine, OPCC Senior Performance and Governance Manager  
Alaina Davies, OPCC Resources Officer

**Also in Attendance**

Claire Hiscott, Deputy Police and Crime Commissioner  
Jackson Murray, Grant Thornton (part of the meeting)  
Gail Turner-Radcliffe, Grant Thornton (part of the meeting)  
Juber Rahman, SWAP  
David Hill, SWAP  
Cllr Jonathan Hucker (observing)

**28. Apologies for Absence**

Mark Shelford, Police and Crime Commissioner  
Dan Wood, Chief Officer – People and Organisational Development

**29. Emergency Evacuation Procedure**

The emergency evacuation procedure for each call participant was left for them to determine.

**30. Declarations of Interest / Gifts / Offers of Hospitality**

None.

### 31. Public Access

There were no requests for public access received before the 12.00 noon deadline the working day prior to the meeting.

### 32. Minutes of the Joint Audit Committee Meeting held on 19<sup>th</sup> July 2022 (Report 5)

**RESOLVED THAT** the minutes of the meeting held on 19<sup>th</sup> July 2022 were confirmed as a correct record and will be signed by the Chair:

Action update:

**Minute 19(ii)** A draft summary version of the Annual Accounts, based on recommendation of the Redmond Review, was circulated to JAC Members. It was noted that there has not yet been a change in regulation making this a requirement so producing this would go beyond what is required. It was also noted that should this become regulation then the format of the summary provided to JAC Members is likely to change. **Close action**

**Minute 32b(ii)** Members were assured that the recommendation around IT access from the external auditors has been actioned and closed. **Close action**

**Minute 7(i)** Action to report back on timescales for putting in place an action plan to take forward the Data Strategy. The Constabulary reported that progress has been made around the next steps for information governance within the Constabulary. This has included discussions to define the risk appetite and the presentation of a business case to September Constabulary Management Board agreeing growth in the information governance function providing the capacity to develop the framework further and move forward plans. Continued monitoring of this will be through the risk register reporting. **Close action**

**Minute 19(i)** The wording of sections 5 and 6 of the Group Statement of Accounts has been made clearer and a 2021/22 column added to the table. **Close action**

**Minute 19(ii)** Wording has been added to the Statement of Accounts to direct people to the website for the annual gender pay report. **Close action**

**Minute 19(ii)** Members have fed back their questions on the

Statement of accounts and the full set of questions and answers will be presented at the Joint Audit Committee on 7<sup>th</sup> November 2022. **Close action**

**Minute 23** JAC Members were sent the Member/Chair role profiles and person specifications. These will be re-issued to one of the Members but it was noted that the other three have provided feedback. **Close action**

**Minute 24e(i)** The Internal Audit Representative Workforce report was amended to include wording at the start which adds context around the complexity of this area of business. **Close action**

**Minute 24(ii)** JAC Members have provided further thoughts to the OPCC CFO on what success looks like to them in relation to Representative Workforce. **Close action**

### **33. External Audit: Progress Report (Report 10)**

The audit of the Accounts is well under way and the report provides an update on the three areas of risk in the plan. Detailed testing work began in August with a hybrid approach which has been of benefit. The Audit Findings report will be submitted to the Joint Audit Committee meeting on 7<sup>th</sup> November 2022.

The 2020/21 audits are now fully closed with the audit certificates having been issued – the delay was due to whole of government accounts work.

Updates on the three areas of risk were discussed:

#### **1. Management Override of Controls**

A new control process is in place (Assyst Portal) which is reducing the number of Journal requests but limitations of the SAP system mean that the issue of control is difficult to address – this means that the number of entries the external auditors look at are higher than they otherwise would be. The external auditors have asked to be involved in conversation around the new Enterprise Resource Planning (ERP) system to ensure the right controls are in place. It was noted that no errors or instances of fraud have been found to date but the risk remains.

The Constabulary confirmed that IT colleagues have made updates regarding access as recommended. The messaging around the use of the Assyst Portal will be reinforced. It was noted that the budgetary controls provide mitigation and quarterly financial performance reports are reported to CMB and GSB.

#### **2. Valuation of Land and Buildings**

A recommendation was raised last year around specialised assets e.g. HQ. There is a challenge in terms of third party evidence to support the number of assumptions.

#### **3. Valuation of the Pension Fund Net Liabilities (Local Government Pension Scheme and Police Pension Scheme)**

There were conversation late last year on comparing the actuary estimate to the actual. Members were assured that additional controls and processes have been built in this year to avoid similar delays. It was noted that the pension assets and liabilities will be reported on a gross basis going forward rather than the net position.

The recent communication from the PSAA regarding procurement and the expected significant increase in external audit fees was highlighted. It is the ambition of audited bodies that an increase in fees such as this would increase audit resource and shorten the length of time audits take to complete.

The external auditor highlighted that a wider member of the Grant Thornton team is joining Avon and Somerset Police. The Committee was assured that Grant Thornton have consulted and this is not seen as an issue as the person is not working on the Avon and Somerset Police audit and will not be joining the police in a finance based role. There will be a full representation of this in the Audit Findings Report.

#### **34. Office of the Police and Crime Commissioner (OPCC) Strategic Risk Register (Report 6)**

The OPCC Strategic Risk Register was reviewed at the Organisational Management Board (OMB) a few weeks ago and there were no movements in risk gradings. The JAC Chair requested that failure to recruit a new JAC Chair be added to the risk register.

SR1 Governance Failure – due to capacity issues within the OPCC a revised version of the Joint Governance Framework has not been produced. Updates will be made to the current Joint Governance Framework as an interim measure while the in depth review is awaited. Members requested that the final revised version of the Joint Governance Framework be shared with the JAC when it is available – the OPCC CFO will confirm the timescales for this work. It was confirmed that once the OPCC have completed the initial work on this it will go to the Constabulary for consultation as part of this joint piece of work.

SR2 Failure to Deliver the Police and Crime Plan/ SR3 Financial Incapability and Ineffectiveness – the uncertain financial situation was discussed and the potential to need to make significant savings which may impact on service delivery and the ability to deliver the Police and Crime Plan.

SR4 Failure to Engage with the Public and Other Stakeholders – the OPCC has set up Councillor forums which is a really positive engagement opportunity to discuss local issues with local representatives.

SR5 Lack of Public Confidence in or Awareness of the PCC – media narrative was highlighted and the impact this has on public perception of the police which links to the PCC.

SR6 Lack of Capacity, Capability, or Poor Wellbeing within the OPCC – the OPCC Chief of Staff gave a full update to the JAC at the July meeting on the OPCC Review and background to this. The OPCC is now in a period of transition to the new



structure. A business plan and action tracker has been produced as well as the people strategy and performance development review (PDR) process being worked on. It was noted that some of the review may take longer to deliver while the capacity and capability is built.

SR7 Failure to Deliver Commissioned Services – concerns were raised that there may be extra duties for OPCC coming out of the Victims Bill with no additional funding. It was highlighted that a number of contracts are coming to an end over the coming years and recommissioning processes have commenced which places additional demand on the team. JAC Members raised concerns around the risks providers face from inflation and what mitigations are being looked at around this emerging risk. The OPCC CFO confirmed that this is a concern which the OPCC has been looking into and have approached other areas to find out what they are doing and there are a range of approaches. This was highlighted as part of the Commissioning Budget conversations and whether provision should be made.

SR8 Failure to Deliver Effective and Efficient Collaborations with other forces – the regional Chief Constables are looking at options in relation to South West Forensics. Members sought assurance on how the options are being taken forward. The Constabulary want to be operationally confident that they are getting the right service. An assurance report is being submitted to November 2022 CMB on the service to Avon and Somerset – this will give an insight into what is working well and is not.

SR9 Failure to Deliver Effective and Efficient Collaborations or Outcomes with other Partners – the impact political and economic changes have on partners was highlighted.

#### **RESOLVED THAT**

- (i) Failure to recruit a JAC Chair be added to the OPCC Strategic Risk Register; and
- (ii) The final revised version of the Joint Governance Framework should be shared with JAC Members and the OPCC CFO should confirm the timescales for when this will be available as soon as possible.

### **35. Constabulary Strategic Risk Register (Report 7)**

The increase in the number of risks recorded on the register to 137 was highlighted. This is a positive sign indicating the risk management process in being properly embedded across the organisation with an improved culture in the approach to risk.

Corporate Risk 2 Financial – this risk has increased to reflect uncertainty around inflation, interest and exchange rates, the change in administration and the impact of budget announcements. This is a difficult time to pull together the 5 year Medium Term Financial Plan (MTFP) with challenges around inflation, pressure relating to pay awards, residual challenges around pension costs to pick up and managing delivery of uplift whilst needing to make savings. It was noted that some savings pressures may be temporary.

Corporate Risk 3 Service Delivery – in assessing this risk the Constabulary looked at public confidence data from the last 12 months and the beating crime plan. The Constabulary will continue to work on ways to make a more informed assessment of risk.

Corporate Risk 4 People – it was noted that there will be more of a focus on this risk when it is reported to the December JAC.

Corporate Risk 5 Information Governance, Digital and Data – the Constabulary are confident in progress being made in relation to information governance. A business case and investment decision has been approved and the Constabulary will be moving forward with the model as approved – this is a key part of mitigating this risk.

Corporate Risk 6 Infrastructure and Assets – this has increased as a reflection of economic pressures.

The Constabulary will have data visualisation through Qlik available for the December JAC meeting and will be able to present the data in different ways.

**RESOLVED THAT** a demonstration of the data visualisation on Qlik should be scheduled for a Joint Audit Committee pre-meet in December 2022.

### **36. Business from the Chair (Report 8):**

Members discussed the potential significant increase in external audit fees as per the recent communication from the PSAA (they have indicated 150% increase in 2023/23 based on bid prices). They are hoping the audit duration will come down. Members discussed whether it would be appropriate to raise this nationally or regionally as a concern but it was noted that fees will have more validity having gone through a market exercise.

#### **a) Governance and Scrutiny Board (GSB) Update**

Members have received the minutes of the GSB meetings held on 6<sup>th</sup> July 2022 and 1<sup>st</sup> August 2022. The OPCC CFO gave a summary of the discussions at the GSB on 7<sup>th</sup> September 2022:

- The Deputy Chief Constable update focused on public confidence, costs of living impacts and national increases in serious violence.
- A business case in relation to workforce planning was agreed for growth of £300,000 recognising that this is an area of priority.
- IPQR – the PCC sought assurance on how the Constabulary are held to account for performance around investigation standards.
- A Mental Health Assurance report was presented – key point of discussion was around aligning the police approach to the health approach in adhering to practitioner guidelines. High intensity users were also discussed and the Constabulary is working with the Integrated Care Group to consider this.
- Early high level assumptions around the MTFP were presented and discussed.

## **b) Update on Independent Office of Police Complaints (IOPC) Investigations**

There are 16 live investigations with the oldest being from January 2020. Themes of the investigations include concern for welfare and missing people, dissatisfaction around police response, use of force, inappropriate sexual behaviour and social media. Members were assured around the social media case that, whilst the case relates to a historic incident before the officer joined the force, the Constabulary are checking there are no current issues.

## **c) Update on JAC Chair Recruitment**

The JAC Chair recruitment is on hold pending resource availability in the OPCC (there is only 1 person dealing with HR). Efforts to recruit another resource have been unsuccessful so far so the work cannot be programmed in yet. The Chair position will either become vacant or an extension of the current Chair until March 2023 will need to be agreed. The JAC Chair sought assurance that options were being looked at for the JAC Chair recruitment. JAC Members also raised concerns that their tenures would come to an end in March 2023 posing a risk to continuity. The CFOs will meet to discuss JAC Recruitment, ensuring continuity and simplifying the approach.

It was agreed that a paper should be presented to JAC Members setting out the process for the JAC Chair and Member recruitment, what the mitigating options are, the question over the number of Members and ensuring the right skills.

### **RESOLVED THAT**

- (i) OPCC and OCC CFO will discuss a way forward in terms of JAC Recruitment, ensuring continuity and a more simplified approach; and
- (ii) a paper should be presented to JAC Members setting out the process for the JAC Chair and Member recruitment, what the mitigating options are, the question over the number of Members to maintain quoracy and ensuring the right skills.

## **37. Internal Audit Reports (Report 9):**

### **a) South West Audit Partnership (SWAP) Quarterly Update**

No significant risk have been identified to date. Quarter 3 audits have commenced with scoping for Quarter 4 audits underway. The remaining 2 follow up reports will be complete by the end of the year.

Regional audits – a new Assistant Director has been appointed to the Emergency Services Team and part of that role will be to progress the regional programme and manage the police partners. The new person will be in post to attend the December 2022 JAC Meeting.

Members were assured that the 5 contingency days can be carried forward if not used.

SWAP highlighted the changes they are making to audit delivery next year which will bring all police partners in line. The new approach is designed to give wider assurance and be more proactive than having an annual plan which is not as responsive to a quick changing risk landscape. SWAP confirmed that their data product went live in October and will include the police next month. As Members were not involved in discussions regarding these changes they requested a meeting with SWAP to discuss questions they have.

Members asked for clarification regarding the suggestion in the report that other forces engage at a Chief Constable level rather than Deputy Chief Constable (DCC) as in Avon and Somerset. It was confirmed that engagement at DCC level is consistent across other forces.

**RESOLVED THAT** JAC Members will meet with SWAP to discuss questions they have in relation to the change in approach to audit delivery.

#### **b) Key Financial Controls**

This audit looked at whether the force has effective key control frameworks in place for accounts payable and budgetary control processes. A reasonable level of assurance was given with 5 actions raised and some lower level recommendations around duplicate suppliers.

The finding in relation to Fleet related payments is something the Constabulary specifically asked SWAP to look at as these are managed on a separate Fleet system rather than the finance system – the Constabulary will be reenforcing the message on segregation of duties and will also be looking at whether it is possible to integrate this into the new ERP system.

The issues around duplicate suppliers have been raised before and the Constabulary will look at this again but it might be that some suppliers appear to be duplicate but aren't e.g. Fleet suppliers where different dealerships of a larger company are dealt with. It was noted that small samples are looked at routinely by business partners and the OCC CFO will be picking this up in his quarterly monitoring meetings.

Members queried whether the wording of the action around unpaid invoices was sufficient. The Constabulary are exploring what improvements can be made to the current system and will also be considering this action as part of the new ERP roll out.

#### **c) Firearms Licencing**

This audit looked at whether there is a sound framework in place in Avon and Somerset Police for the issuing and management of firearms licenses. A reasonable assurance opinion was given and 3 actions raised in relation to high-risk applications and confirming risk when making decisions regarding grant and renewal applications.

Members queried whether consideration is being given to moving to a regional model for this going forward. This is not actively being considered but all forces work to the same national standards and share intelligence locally, regionally and nationally. The close working relationship Avon and Somerset Police have with GPs was highlighted. This is a big responsibility in local policing and there would be nervousness in moving away from local delivery of this as the connection to local/neighbourhood policing is important.

The Constabulary reported that all issues in the report have been addressed and actions taken.

A regional audit of this was discussed but this would have been complicated. Instead, 3 other forces have this in their audit plans for this year and there will then be the opportunity to pool the information and share the findings (potentially in quarter 4).

#### **d) Reasonable Adjustments**

This audit looked at the effectiveness of the force's reasonable adjustment process which support individuals with disabilities, neurodiversity and other long term health conditions. A limited assurance opinion was given which was based on record keeping. It was noted that conversations around the new ERP system should seek to address issues raised in the report.

It is recommended that the quality of the reasonable adjustments made should be checked and feedback should be sought from individuals who have undergone the process to identify any learning. Also, the process for reasonable adjustment requirements should be in train before individuals begin working in the organisation so that adjustments are in place on day 1 of their employment. Members discussed how needs may vary overtime and the need to raise awareness with managers on employee rights.

The OCC CFO is the force Lead for Disability and Neurodiversity. The force has introduced Health and Wellbeing Passports to record individual needs and inform discussions regarding reasonable adjustments. The force has the framework to take this work forward but recognise the need to do more to embed and track the reasonable adjustments.

Members asked if there is a legacy responsibility the force has for those suffering from Post Traumatic Stress Disorder (PTSD), injury on duty etc. when they have left the force. The Constabulary will consider this and bring back a response. The Government Covenant around Health and Wellbeing extends to retired officers and staff. This is a question of legal and moral responsibility. The Constabulary is seeking to become a much more trauma informed and responsive organisation which means providing mechanisms for people to cope.

Members asked how the breakdown of disabilities provided in the pie chart compares with other forces. This comparison has not been done.

Members raised concerns about missing information when people don't want to identify as having a disability but they do have one of the conditions that come under that. The way the system is set up to ask for this data was discussed.

**RESOLVED THAT** the Constabulary will consider if they should have a legacy responsibility for officers and staff leaving the organisation due to PTSD, injury on duty etc.

**e) Remote Working Follow Up**

There is one action outstanding which is in progress and planned for completion by the end of the month. Members were assured that this action does have a Lead and that the OCC CFO asks for updates on progress on a very regular basis.

**38. Audit Progress Review from Finance and Assets Committee (Report 11)**

There are 54 open recommendations with 3 overdue. The process for setting new deadlines for completion of recommendations and agreeing original dates against the recommendations was discussed. The Business Leads, with their expert knowledge, advise when new dates need to be set. It was noted that any risks relating to overdue actions are considered by the Finance and Assets Committee.

SWAP will be working on a dashboard that will show outstanding actions and the risks associated with that. This dashboard will be reported to the JAC.

**Part 2**

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**Items for consideration without the press and public present**

**39. Exempt Minutes of the Joint Audit Committee Meeting held on 19<sup>th</sup> July 2022 (Report 12)**

**40. Regional Internal Audit Work (Report 13): Regional Pensions Administration**

**SEE EXEMPT MINUTES**

The meeting concluded at 16:05

**CHAIR**

## ACTION SHEET

<b>MINUTE NUMBER</b>	<b>ACTION NEEDED</b>	<b>RESPONSIBLE MEMBER/ OFFICER</b>	<b>DATE DUE</b>
<b>Minute 10c</b>  <b>Internal Audit Report: Criminal Justice</b>  <b>16<sup>th</sup> March 2022</b>	A Criminal Justice Follow Up report should be presented to Members in 12 months – this should include numbers as well as percentages	SWAP	15 <sup>th</sup> March 2023
<b>Minute 22</b>  <b>Constabulary Strategic Risk Register</b>  <b>19<sup>th</sup> July 2022</b>	The constabulary should make it clear in the dialogue the reasons for the increased volume of police misconduct cases. The increase due to confidence in reporting is positive and should be highlighted as such.	Constabulary Governance and Risk Manager	14 <sup>th</sup> December 2022 JAC Meeting
<b>Minute 23a</b>  <b>Draft JAC Annual Report</b>  <b>19<sup>th</sup> July 2022</b>	A meeting should be scheduled on an annual basis (after 31 <sup>st</sup> March) prior to the production of JAC Annual report to review the contents and training updates.	OPCC Strategic Planning and Performance Officer	Prior to the July 2023 JAC Meeting
<b>Minute 24d</b>  <b>Internal Audit: IT Service Desk</b>  <b>19<sup>th</sup> July 2022</b>	SWAP will send the OPCC CFO the schedule of national issues.	SWAP	Immediate
<b>Minute 34 (i)</b>  <b>OPCC Strategic Risk Register</b>  <b>11<sup>th</sup> October 2022</b>	Failure to recruit a JAC Chair be added to the OPCC Strategic Risk Register.	OPCC Senior Performance and Governance Manager	Immediate
<b>Minute 34 (ii)</b>  <b>OPCC Strategic Risk Register</b>  <b>11<sup>th</sup> October 2022</b>	The final revised version of the Joint Governance Framework should be shared with JAC Members and the OPCC CFO should confirm the timescales for when this will be available as soon as possible.	OPCC CFO	TBC – update 14 <sup>th</sup> December 2022 JAC
<b>Minute 35</b>  <b>Constabulary Strategic Risk</b>	A demonstration of the data visualisation on Qlik should be scheduled for a Joint Audit Committee pre-meet in	OPCC to liaise with the Constabulary Governance and	14 <sup>th</sup> December 2022

<b>Register</b> <b>11<sup>th</sup> October 2022</b>	December 2022.	Risk Manager	
<b>Minute 36c (i)</b> <b>Business from the Chair: Update on JAC Chair Recruitment</b> <b>11<sup>th</sup> October 2022</b>	OPCC and OCC CFO will discuss a way forward in terms of JAC Recruitment, ensuring continuity and a more simplified approach	OPCC/OCC CFO	Immediate
<b>Minute 36c (ii)</b> <b>Business from the Chair: Update on JAC Chair Recruitment</b> <b>11<sup>th</sup> October 2022</b>	A paper should be presented to JAC Members setting out the process for the JAC Chair and Member recruitment, what the mitigating options are, the question over the number of Members to maintain quoracy and ensuring the right skills.	OPCC CFO	14 <sup>th</sup> December 2022
<b>Minute 37a</b> <b>Internal Audit: Quarterly Update</b> <b>11<sup>th</sup> October 2022</b>	JAC Members will meet with SWAP to discuss questions they have in relation to the change in approach to audit delivery.	SWAP	Immediate
<b>Minute 37d</b> <b>Internal Audit: Reasonable Adjustments</b> <b>11<sup>th</sup> October 2022</b>	The Constabulary will consider if they should have a legacy responsibility for officers and staff leaving the organisation due to PTSD, injury on duty etc.	OCC CFO	14 <sup>th</sup> December 2022



**MINUTES OF THE JOINT AUDIT COMMITTEE (JAC) MEETING HELD ON MONDAY 7<sup>TH</sup> NOVEMBER 2022 AT 13:30. MEETING HELD VIA TEAMS.**

**Members in Attendance**

Jude Ferguson (Chair)  
Zoe Rice  
Martin Speller  
David Daw, Joint Audit Committee Member

**Officers of the Constabulary in Attendance**

Sarah Crew, Chief Constable  
Nick Adams, Constabulary CFO  
Claire Hargreaves, Head of Finance  
Emma Snailham, Corporate Business Partner Financial

**Officers of the Office of the Police and Crime Commissioner (OPCC)**

Paul Butler, OPCC CFO  
Alaina Davies, OPCC Resources Officer

**Also in Attendance**

Mark Shelford, Police and Crime Commissioner  
Jackson Murray, Grant Thornton  
Gail Turner-Radcliffe, Grant Thornton  
George Amos, Grant Thornton  
Juber Rahman, SWAP  
David Hill, SWAP

**41. Apologies for Absence**

Alice Ripley, OPCC Chief of Staff  
Nikki Watson, Deputy Chief Constable  
Dan Wood, Chief Officer – People and Organisational Development  
Michael Flay, Governance and Risk Manager  
Ben Valentine, OPCC Senior Performance and Governance Manager

**42. Emergency Evacuation Procedure**

The emergency evacuation procedure for each call participant was left for them to determine.

**43. Declarations of Interest / Gifts / Offers of Hospitality**

None.

**44. Public Access**

There were no requests for public access received before the 12.00 noon deadline the working day prior to the meeting.

#### **45. Business from the Chair**

The Joint Audit Committee (JAC) Chair thanked everyone for attending this additional JAC Meeting to discuss the annual accounts. The Chair also thanked the team responsible for putting the annual accounts together and recognised the immense amount of work undertaken each year to produce these.

#### **46. Annual Accounts and Governance Statement (Report 5)**

##### **a. Annual Accounts and Governance Statement**

The covering paper summarises the main areas of changes to the presentation of the accounts as a result of Avon and Somerset being selected, this year, by Grant Thornton as one of the Forces included in a special review. This meant that the specialist technical accounting team reviewed the accounts in line with the CIPFA Code and best practice.

Members were assured that no changes in values have been made just movement in presentation of some of the numbers – notes have been added to the accounts to indicate where this has occurred. A detailed review of the critical judgements section has been carried out on both sets of financial statements and further narrative on the accounting treatment between the PCC and OCC entities added.

Changes to the valuation process include a recategorization of Yeovil as a surplus asset as it is not currently in use. The Constabulary have proposed to Grant Thornton that this be shown as non-adjusted for 2021/22 but amended for 2022/23. It was noted that work continues on linking note 6 back to the 2021/22 outturn.

**RESOLVED THAT** the Joint Audit Committee recommends that the Police and Crime Commissioner and Chief Constable sign the 2021/22 Annual Accounts subject to satisfactory responses to outstanding queries from the External Auditors.

##### **b. Joint Audit Committee Member Questions and Answers**

JAC Members were satisfied with the answers that had been provided to their questions but asked for some clarification and changes in the formatting for publication:

**RESOLVED THAT** the Joint Audit Committee (JAC) Members will flag clarification points and requested changes in formatting for the Questions and Answers. An updated version should then replace the one published on the JAC page of the PCC's website.

#### **47. External Audit: Audit Findings Report (Report 6)**

Initial findings and significant areas of risk are highlighted in the report and were discussed at the previous meeting of the Joint Audit Committee in October 2022.

Grant Thornton highlighted that there are still a number of small areas to close in relation to note 6 e.g. evidence in relation to Journals. The External Auditors are proposing to issue an unqualified opinion in relation to 2021/22, subject to satisfactory responses to outstanding queries. It was noted that there will be a similar delay in issuing the audit certificates as there was for 2020/21 while the whole of government accounts audit work concludes. Value for Money will be reported at the December 2022 Joint Audit Committee looking at governance, financial sustainability and improving economy, efficiency and effectiveness.

Significant risk areas were highlighted again:

- Management override of controls relating Journals etc was discussed at the previous JAC Meeting. Management responses to recommendations are included.
- Valuation of pension fund liability – awaiting final pension fund assurance letter.
- Land and buildings – this was discussed at the previous JAC meeting and the Yeovil recategorization is highlighted at minute 46b. The CIPFA flow chart followed regarding Yeovil was highlighted – as this is currently not used it is classed as surplus and should be valued in a different way (fair valuation – what would be market value). Members were assured that the proposal from the Constabulary for this to be shown as non-adjusted for 2021/22 does not cause any issues in terms of the External Auditors issuing their opinion. A classification issue was also picked up in terms of part of Kenneth Steel House which is rented out so is an investment, this will need to be reflected in the balance sheet.
- The IT findings from the previous year around user access and privileges have been addressed. Users will have the same capabilities but there is now an audit log of activity.

Annual Governance Statement letters of representation will need to be signed by the PCC and Chief Constable.

The Audit Findings report highlights, at section 4 – Independence and ethics, that a Grant Thornton colleague is joining Avon and Somerset Police on a detective programme. Once Grant Thornton became aware that the colleague had applied they put safeguarding in place to ensure that they were not working on or privy to the audit. The PCC and Chief Constable were also made aware and assured that this person was not seeking to join the Constabulary in a finance role.

A proposed breakdown of the audit fees is included in the report with the final fee being confirmed as part of the Annual Report to the Joint Audit Committee.

Members were assured that Grant Thornton are not suggesting any fraud and that additional testing of Journals undertaken did not raise any concerns and are just awaiting responses to the final requests for evidence.

The Committee, again, discussed the protracted nature of the audit and the pressure this puts on the Finance Team and whether there was anything further that could be done to alleviate this. This is as a result of audit capacity issues and where the Force sits in the audit plan. The Constabulary flagged to Members that the focus of the Finance Team has now had to shift to budget planning for 2023/24.

Members were assured that once the 2021/22 final accounts are signed off and published the Constabulary will look to produce a summary for publication alongside these.

**RESOLVED THAT** once the 2021/22 final accounts are signed off and published the Constabulary will look to produce a summary for publication alongside these.

The meeting concluded at 14:10

**CHAIR**

### ACTION SHEET

MINUTE NUMBER	ACTION NEEDED	RESPONSIBLE MEMBER/ OFFICER	DATE DUE
<b>Minute 10c</b>  <b>Internal Audit Report: Criminal Justice</b>  <b>16<sup>th</sup> March 2022</b>	A Criminal Justice Follow Up report should be presented to Members in 12 months – this should include numbers as well as percentages	SWAP	15 <sup>th</sup> March 2023

<b>Minute 22</b> <b>Constabulary Strategic Risk Register</b> <b>19<sup>th</sup> July 2022</b>	<p>The constabulary should make it clear in the dialogue the reasons for the increased volume of police misconduct cases. The increase due to confidence in reporting is positive and should be highlighted as such.</p>	<p>Constabulary Governance and Risk Manager</p>	<p>14<sup>th</sup> December 2022 JAC Meeting</p>
<b>Minute 23a</b> <b>Draft JAC Annual Report</b> <b>19<sup>th</sup> July 2022</b>	<p>A meeting should be scheduled on an annual basis (after 31<sup>st</sup> March) prior to the production of JAC Annual report to review the contents and training updates.</p>	<p>OPCC Strategic Planning and Performance Officer</p>	<p>Prior to the July 2023 JAC Meeting</p>
<b>Minute 24d</b> <b>Internal Audit: IT Service Desk</b> <b>19<sup>th</sup> July 2022</b>	<p>SWAP will send the OPCC CFO the schedule of national issues.</p>	<p>SWAP</p>	<p>Immediate</p>
<b>Minute 34 (i)</b> <b>OPCC Strategic Risk Register</b> <b>11<sup>th</sup> October 2022</b>	<p>Failure to recruit a JAC Chair be added to the OPCC Strategic Risk Register.</p>	<p>OPCC Senior Performance and Governance Manager</p>	<p>Immediate</p>
<b>Minute 34 (ii)</b> <b>OPCC Strategic Risk Register</b> <b>11<sup>th</sup> October 2022</b>	<p>The final revised version of the Joint Governance Framework should be shared with JAC Members and the OPCC CFO should confirm the timescales for when this will be available as soon as possible.</p>	<p>OPCC CFO</p>	<p>TBC – update 14<sup>th</sup> December 2022 JAC</p>
<b>Minute 35</b> <b>Constabulary Strategic Risk Register</b> <b>11<sup>th</sup> October 2022</b>	<p>A demonstration of the data visualisation on Qlik should be scheduled for a Joint Audit Committee pre-meet in December 2022.</p>	<p>OPCC to liaise with the Constabulary Governance and Risk Manager</p>	<p>14<sup>th</sup> December 2022</p>
<b>Minute 36c (i)</b> <b>Business from the Chair: Update on JAC Chair Recruitment</b> <b>11<sup>th</sup> October 2022</b>	<p>OPCC and OCC CFO will discuss a way forward in terms of JAC Recruitment, ensuring continuity and a more simplified approach</p>	<p>OPCC/OCC CFO</p>	<p>Immediate</p>
<b>Minute 36c (ii)</b>	<p>A paper should be presented to JAC Members setting out the</p>	<p>OPCC CFO</p>	<p>14<sup>th</sup> December</p>

<b>Business from the Chair: Update on JAC Chair Recruitment</b> <b>11<sup>th</sup> October 2022</b>	process for the JAC Chair and Member recruitment, what the mitigating options are, the question over the number of Members to maintain quoracy and ensuring the right skills.		2022
<b>Minute 37a</b> <b>Internal Audit: Quarterly Update</b> <b>11<sup>th</sup> October 2022</b>	JAC Members will meet with SWAP to discuss questions they have in relation to the change in approach to audit delivery.	SWAP	Immediate
<b>Minute 37d</b> <b>Internal Audit: Reasonable Adjustments</b> <b>11<sup>th</sup> October 2022</b>	The Constabulary will consider if they should have a legacy responsibility for officers and staff leaving the organisation due to PTSD, injury on duty etc.	OCC CFO	14 <sup>th</sup> December 2022
<b>Minute 46b</b> <b>Annual Accounts and Governance Statement: Joint Audit Committee Members Questions and Answers</b> <b>7<sup>th</sup> November 2022</b>	Joint Audit Committee (JAC) Members will flag clarification points and requested changes in formatting for the Questions and Answers. An updated version should then replace the one published on the JAC page of the PCC's website.	JAC Members to liaise with the Constabulary CFO	Immediate
<b>Minute 47</b> <b>External Audit: Audit Findings Report</b> <b>7<sup>th</sup> November 2022</b>	Once the 2021/22 final accounts are signed off and published the Constabulary will look to produce a summary for publication alongside these.	Constabulary CFO	ASAP

MEETING: <b>Joint Audit Committee</b>	DATE: <b>24<sup>th</sup> January 2023</b>	AGENDA NO: <b>6.1</b>
NAME OF PAPER: <b>OPCC Strategic Risk Management Update</b>	AUTHOR: <b>Ben Valentine</b>	PURPOSE: <b>Information and Discussion</b>

## 1. PURPOSE OF REPORT AND BACKGROUND

This report provides members of the Joint Audit Committee (JAC) with an overview of any significant changes to the Office of the Police and Crime Commissioner (OPCC) Strategic Risk Register (SRR), and other points related to the management of risk, in the period of time since the last JAC meeting held on 11<sup>th</sup> October 2022.

## 2. POINTS OF NOTE

The Strategic Risk Register was reviewed by the OPCC Management Board on 21<sup>st</sup> November. It was agreed there had not been anything significant enough to change any of the risk assessments: all scores remain the same.

### SR1 – Governance Failure

A review has commenced of the Governance and Scrutiny Board to improve its effectiveness.

### SR2 – Failure to deliver the Police and Crime Plan

The most significant risk to this is caused by the financial situation which could, once again, require the police to make cuts to staff levels which will impact on service delivery.

### SR3 – Financial incapability or ineffectiveness

The MTFP currently being drafted shows significant deficits across the term. Whereas the previous version showed balanced budgets across the first three years and a deficit of £6.2 million by year five; it is now only balanced in year 1 (using £3.4 million reserves) with the year 5 deficit projected to be £19 million.

The true financial risk here is not taking appropriate and timely steps to reduce expenditure and relying on depleting reserves to fund remaining deficits.

### SR4 – Failure to engage with the public and other stakeholders

A review has commenced of the Performance and Accountability Board in order to try and increase the engagement of the meeting. The revised format will go live from March 2023.

The OPCC knife crime survey closed on 21<sup>st</sup> November with over 2,500 responses. The remarkable point is that 1,200 of those responses (47%) were from people under 18 years of age. This survey also achieved a more ethnically diverse set of respondents (although still not representative of the population).

The annual precept survey launched on 21<sup>st</sup> December; this has again included a postal element to increase the ethnic diversity of the response base.

### SR5 – Lack of public confidence in or awareness of OPCC

A session has been scheduled at the February OPCC Management Board to discuss this risk and, in particular, the survey results and what we can learn from these.

### SR6 – Lack of capacity, capability, or poor wellbeing within the OPCC

Since last reported the temporary HR Support Officer and temporary VRU Comms Manager have both started in their roles. It should be noted that the VRU Comms Manager role is only 50% funded with VRU money so she is able to support on broader communications and engagement work. There have been periods of absence in the Comms and Engagement team which have placed additional pressure on this area of work and the Engagement and Events Manager role has not been filled after two unsuccessful rounds of recruitment.

The new PA also started in January which will start to enable the Secretariat Manager to build their new role.

An OPCC staff pulse survey – particularly about the review – was conducted in November and the results shared and discussed with the wider team in December.



**Office of the Police and Crime Commissioner for Avon and Somerset**

**Strategic Risk Register**

**December 2022**

A Strategic Risk is anything that might impede the delivery of the organisational objectives. Risk management is the process by which these risks are identified, assessed and controlled. This risk register is the document which records these risks and related information.

Risk is assessed by considering the causes of the risk and the consequences if that risk were to happen. The scoring is therefore based on the likelihood multiplied by the impact. The below grids explain the scoring in more detail. Risk is about planning for the future so when considering the assessment it goes beyond current performance.

<b>Impact</b>	5 Extreme	5	10	15	20	25
	4 High	4	8	12	16	20
	3 Moderate	3	6	9	12	15
	2 Low	2	4	6	8	10
	1 Negligible	1	2	3	4	5
		1 Rare	2 Unlikely	3 Possible	4 Likely	5 Almost Certain
<b>Probability</b>						



Probability	
5 Almost Certain	Likely to occur within a twelve-month time period, or about a 75% probability of occurrence
4 Likely	Likely to occur within a two-year time period, or about a 50% probability of occurrence
3 Possible	Likely to occur within a three-year time period, or about a 25% probability of occurrence
2 Unlikely	Likely to occur within a five-year time period, or about a 15% probability of occurrence
1 Rare	Likely to occur in a ten year period, or about a 5% probability of occurrence

Impact	
5 Extreme	<ul style="list-style-type: none"> <li>• Fatality of any individual</li> <li>• Financial impact greater than £1/2 m</li> <li>• Vote of no confidence from Local Authorities - failed</li> <li>• National media attention</li> <li>• Government/ HO intervention</li> <li>• Total disruption to service</li> <li>• Exceptional/long term reputational damage</li> </ul>
4 High	<ul style="list-style-type: none"> <li>• Serious life-threatening injury of any individual</li> <li>• Financial impact greater than £1/4 m</li> <li>• Vote of no confidence from Local Authorities - failed</li> <li>• Regional media attention</li> <li>• Adverse comment by Minister / auditor</li> <li>• Major service disruption/reputational damage</li> </ul>
3 Moderate	<ul style="list-style-type: none"> <li>• Serious non-life-threatening injury of any individual</li> <li>• Financial impact greater than £100k</li> <li>• Criticism from the Police and Crime Panel</li> <li>• Local media attention</li> <li>• Significant service disruption</li> <li>• Significant reputational damage</li> </ul>
2 Low	<ul style="list-style-type: none"> <li>• Minor injury of any individual</li> <li>• Financial impact up to around £100k</li> <li>• Multiple thematic complaints</li> <li>• Some service disruption</li> <li>• Some negative consequences relating to reputation</li> </ul>
1 Negligible	<ul style="list-style-type: none"> <li>• Slight injury of any individual</li> <li>• Low level financial loss</li> <li>• Isolated complaints</li> <li>• Minor service disruption</li> <li>• Minor/contained negative consequences</li> </ul>

The unmitigated scores are the assessment based on the current position with no action taken or controls in place. The mitigated scores are based on the success of the controls (anticipated or actual) in reducing the risk.

It should be noted that the OPCC and the Constabulary are separate organisations and therefore each may assess the same risk as being at a different level. This is most evident in the risk of failure to deliver the police and crime plan. This exists on both Strategic Risk Registers but may score differently. One of the main reasons for this is that the OPCC assess delivery of the plan as a whole which relies on agencies, other than the Constabulary to fully deliver e.g. the CPS and Courts. Whereas when the Constabulary assess this risk they need only consider the parts of the plan they are expected to deliver. A difference may also be caused whether considering the risk in the short, medium or long term.

RISK			ASSESSMENT		
Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Governance Failure	SR1	Chief of Staff	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			3	4	<b>12</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Joint Governance Framework overdue for review and some areas of uncertainty.</li> <li>New duties and expectations of PCCs arising from the national review. PCCs appear to have extra responsibility but without additional 'levers' to support delivery.</li> <li>Taking on any new responsibilities means there are more likely to be governance failures whilst the team learn.</li> <li>Proposed amendments to the Policing Protocol Order could impact PCC governance.</li> <li>OPCC failure to engage on the design element of the '3 Ds' ways of working.</li> <li>Failure to ensure effective risk management and support the delivery of service.</li> <li>Information governance failure.</li> <li>Ineffective scrutiny and oversight of services and outcomes delivered by the Constabulary including SPR.</li> <li>Ineffective scrutiny and oversight of the OPCC Equality Duty.</li> <li>Failure to ensure adequate transparency of the OPCC and/or the Constabulary.</li> <li>Failure to ensure Chief Constable sets appropriate culture, ethics and values.</li> <li>Lack of control/influence over Criminal Justice agencies or other partners.</li> <li>Lack of governance over initiation of collaborations or performance of collaborations.</li> <li>OPCC policies and procedures overdue for review.</li> <li>Difficulty recruiting JAC Chair and members - Chair's term ends in March 2023.</li> </ul>		<ul style="list-style-type: none"> <li>Lack of oversight and scrutiny of the Constabulary.</li> <li>Failure to deliver the Police &amp; Crime Plan (SR2).</li> <li>Financial loss (SR3).</li> <li>Damaged reputation and reduced public confidence (SR5).</li> <li>Failure to deliver OPCC statutory requirements.</li> <li>The Constabulary and/or OPCC will be inefficient/ineffective.</li> <li>Failure to deliver the Beating Crime Plan.</li> <li>Damaged relationship with Constabulary, commissioned services or partners.</li> <li>Government criticism or penalties.</li> <li>Panel criticism.</li> <li>Sub-standard performance results and poor inspection outcomes.</li> <li>Risks not managed.</li> <li>Failure to improve the delivery of the broader Criminal Justice Service.</li> </ul>			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>CoS will lead a review of the OPCC which will act as a check and test of governance.</li> <li>OPCC Management Board (OMB) - allows greater oversight of performance, risks and issues and provides a formal decision making mechanism for non-Constabulary business.</li> <li>Joint Governance Framework</li> <li>OPCC policies and procedures being reviewed by external agency.</li> <li>OPCC self assessment of compliance with their Equality Duty.</li> <li>Oversight Boards - Performance &amp; Accountability and Governance &amp; Scrutiny.</li> <li>PCC and Chief Constable 1:1s</li> <li>OPCC attend CMB and other strategic meetings (open invitation from the CC).</li> <li>Joint Audit Committee, External Audit, Internal Audit and annual governance statement.</li> <li>JAC Chair/member recruitment</li> <li>Police and Crime Panel meetings.</li> <li>COG attendance at weekly OPCC SLT.</li> <li>Compliance with statutory reporting requirements.</li> <li>Victim Services appointed and managed by the OPCC Commissioning Team.</li> <li>Independent scrutiny panels for complaints, use of police powers &amp; OOC.</li> <li>Transparency Checklist</li> <li>Constabulary governance redesigned through 2022; this will allow greater oversight of risk and assurance by the OPCC.</li> <li>OPCC Information Governance Group meets 6 weekly to ensure compliance with GDPR and DPA 2018.</li> </ul>	Dec-22	CoS	<ul style="list-style-type: none"> <li>New organisational structure implemented from 1 Nov. Business Plan and related workstream tracker published during Oct.</li> <li>OPCC pulse survey run to get feedback on implementation and identify areas for further development.</li> </ul>		
	Jan-23	Director of P&A	<ul style="list-style-type: none"> <li>Highlight report needs to be refreshed/reinvigorated to reflect new Police &amp; Crime Plan and Business Plan.</li> </ul>		
	Dec-22	CoS CFO	<ul style="list-style-type: none"> <li>OPCC and ASP have done an initial review and the joint feedback is currently being worked on by the OPCC to create a first draft. Best practice examples being researched.</li> <li>Joint Governance Framework review due to be finalised in July 22.</li> </ul>		
	Dec-22 Jan-23	Head of HR & BS CoS	<ul style="list-style-type: none"> <li>Initial assessment discussed with CoS and Head of HR &amp; BS. Worked delayed due to lack of capacity.</li> </ul>		
		CoS PCC CoS CFO	<ul style="list-style-type: none"> <li>Replaced PCB and together will continue to be the principal joint decision making forum and provides the PCC formal oversight of the Constabulary.</li> <li>Formalised OPCC attendance at Strategic Planning Meeting (from Jan 22).</li> <li>The internal audit report on governance concluded that the PCC and CC have an adequate and effective framework for risk management, governance and internal control.</li> </ul>		
	Dec-22	CFO	<ul style="list-style-type: none"> <li>JAC members agreed to second (3 year) term. Chair retiring, recruitment started. New Chair could be existing JAC member so additional recruitment will be needed for a new member if so.</li> </ul>		
		PCC CoS CoS Director of PP&C Director of P&A Head of HR & BS Director of P&A	<ul style="list-style-type: none"> <li>Amended Specified Information Order - quarterly performance report published and complaints overview on PCC website.</li> </ul>		
		Director of P&A	<ul style="list-style-type: none"> <li>CoPaCC transparency award received for many years (not running 2022).</li> <li>New constabulary governance framework implemented but not all KPQs assessed and risk management process not fully embedded.</li> </ul>		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to deliver the Police and Crime Plan	SR2	Chief of Staff	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	<b>16</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Plan is broad and ambitious.</li> <li>Lack of oversight of improvement activity and related outcomes.</li> <li>Underpinning the delivery risk of all of this is the financial uncertainty and the increased public expectation from the additional funding that policing has received both through central government grant and local taxpayers' increase in precept funding.</li> <li>Prevention is hard to measure/evidence and needs more than the police to deliver.</li> <li>Internal police culture and leadership at an operational level.</li> <li>Male violence against women and girls (includes the national rape crisis) carries significant volume and harm.</li> <li>Disproportionate outcomes particularly for Black, Asian, mixed and minoritised communities.</li> <li>Workforce not representative of the communities of A&amp;S; insufficient progress has been made.</li> <li>Lack of capacity/capability within the Constabulary - significant vacancies in CID; inexperienced workforce in Patrol concern about demand and capacity and staff turnover in Comms.</li> <li>Lack of oversight and scrutiny of the Constabulary.</li> <li>Positive Outcomes - not seeing the improvements hoped for.</li> <li>Police response to 'neighbourhood crimes' does not meet public expectations.</li> <li>Court backlogs means justice is not being delivered effectively or efficiently.</li> <li>Lack of control/influence over partnership agencies e.g. CJS.</li> <li>More officers will result in more people going through an already overstretched criminal justice system.</li> <li>Constabulary staff survey results show a decline in 2021.</li> </ul>		<ul style="list-style-type: none"> <li>Loss of legitimacy in the OPCC and Constabulary.</li> <li>Loss of public confidence/trust in the OPCC (SR4) and Constabulary.</li> <li>Undermines the Peelian Principle of policing by consent.</li> <li>Failure to keep people safe.</li> <li>Failure to protect and support vulnerable people.</li> <li>Failure to bring offenders to justice.</li> <li>People will feel unsafe.</li> <li>Police and Crime Panel criticism and/or fail to agree precept increase.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>Police and Crime Plan 2021-25 engagement.</li> <li>Governance and scrutiny arrangements will be reviewed during 2022.</li> <li>OPCC Business Plan to focus the work of the OPCC on the Police and Crime Plan</li> <li>Local plans will be developed to further engage partners</li> <li>Police and Crime Board (PCB) discusses performance, assurance and risk</li> <li>PCC and Chief Constable 1:1s</li> <li>OPCC attend CMB and other strategic meetings (open invitation from the CC).</li> <li>Audits and Inspections (HMICFRS &amp; SWAP) overseen by Joint Audit Committee</li> <li>Internal assurance mechanisms are in place to evaluate delivery of the Plan's objectives</li> <li>Oversight of all strategic constabulary data through Qlik</li> <li>Contacts analysis</li> </ul>	Jan-23	CoS	<ul style="list-style-type: none"> <li>Final version published Jan 22. Public digital platform delayed due to lack of capacity. PCC planning 'internal' ASP roadshow.</li> </ul>		
	Dec-22	CFO	<ul style="list-style-type: none"> <li>OPCC and ASP have done an initial review and the joint feedback is currently being worked on by the OPCC to create a first draft. Best practice examples being researched.</li> <li>A proposed new Director of Performance &amp; Accountability will bring together scrutiny functions into new team, providing enhanced oversight and support to the PCC in this space.</li> </ul>		
	Dec-22	CoS	<ul style="list-style-type: none"> <li>Five strategic aims and key deliverables agreed. Published with related workstream tracker during.</li> </ul>		
	Dec-22	Director of PP&C	<ul style="list-style-type: none"> <li>BANES, N Somerset, Somerset &amp; S Glos have had content approved by respective Boards. Bristol target date pushed back to Dec 22.</li> <li>OPCC will coordinate design and publication of these.</li> </ul>		
		CoS	<ul style="list-style-type: none"> <li>OPCC attendance at CMB and the PCB which follows this continues to work well in terms of assurance and open dialogue about areas of concern where the plan may not be delivered. OPCC renewed attendance at SPM.</li> </ul>		
		PCC	<ul style="list-style-type: none"> <li>Improved visibility of performance and risk through the Constabulary Integrated Performance &amp; Quality Report.</li> </ul>		
		CoS	<ul style="list-style-type: none"> <li>Performance reporting of new plan being developed for public facing reporting and PCB.</li> </ul>		
		CFO			
		CFO			
		Director of P&A			
		Director of P&A			

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Financial incapability or ineffectiveness	SR3	CFO	4	5	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	<b>16</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Global factors impacting policing and wider economy. No additional funding for policing in Autumn Statement 2022.</li> <li>Cost increases due to inflation and interest rates - inflation in 2022 significantly higher than expected; also resulting in higher interest rates which make debt more expensive to service.</li> <li>Pay awards may exceed central government projections and effectively be unfunded.</li> <li>Over-reliance on reserves to fund the budget deficit through the medium term is a risk.</li> <li>3 year settlement from 2022/23 with additional central funding for Op Uplift only.</li> <li>May not be able to achieve maximum precept increase from 2023/24 onwards; especially considering 'cost of living' crisis already impacting the public.</li> <li>Time required for the new PCC to establish budget and estates strategies</li> <li>Risks around pension funds due to wider economic impact.</li> <li>Increasing pension costs for officers and staff schemes; although this will probably be funded.</li> <li>Capital budget not fully funded in 2025/26 – borrowing already at prudent levels and diminishing potential for capital receipts.</li> <li>National work will require local funding with no control over decision making e.g. ESMCP, NPAS, national IT.</li> <li>Uncertainty of local costs in high value areas: IT and replacement of SAP.</li> </ul>		<ul style="list-style-type: none"> <li>As officer numbers are protected it may mean using officers in roles currently undertaken by civilians if other savings do not materialise.</li> <li>Failure to set a sustainable revenue budget or capital plan across the medium term.</li> <li>The need for further savings after 10 years of austerity presents further challenges.</li> <li>Failure to meet heightened expectations of stakeholders.</li> <li>Loss of public confidence (SR5).</li> <li>Unable to fund adequate or minimum service.</li> <li>Unable to fund delivery of PCC priorities (SR2).</li> <li>Unable to afford change.</li> <li>Revenue budget underspends may undermine support from PCP for sustainable increases to the precept.</li> <li>Failure to ensure value for money.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>Joint work on savings plans being progressed through SPM in 2022. Includes consideration of 'spend to save' plans.</li> <li>Medium and long term financial planning.</li> <li>Regular oversight of revenue &amp; capital budget.</li> <li>Maintain adequate risk-assessed reserves.</li> <li>Subject to external and internal audit both overseen by the Joint Audit Committee.</li> <li>Treasury Management strategy in place outcomes reviewed by CFOs.</li> <li>HMICFRS inspection regime.</li> </ul>		CFO  CFO CFO CFO CFO CFO	<ul style="list-style-type: none"> <li>MTFP after planned savings:              2023/24 balanced (with the use of £3.4 million reserves)              2024/25 -£10.0 million              2025/26 -£13.4 million              2026/27 -£16.9 million              2027/28 -£19.0 million</li> </ul>		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to engage with the public and other stakeholders	SR4	Chief of Staff	4	4	16
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	<b>16</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Limited resources within the OPCC to support meaningful and proactive engagement; staffing reduced by 1/3 from Q3 21/22.</li> <li>Engagement methods do not always reach a wide audience or different communities or groups; failure to engage with young people.</li> <li>Lack of awareness from the public.</li> <li>Police and Crime Plan has not been properly 'launched'. Local plans will be ready before this happens and partners will want to publicise. Conflicting priorities.</li> </ul>		<ul style="list-style-type: none"> <li>Reputational damage to both the OPCC and Constabulary.</li> <li>Loss of legitimacy in both the OPCC and Constabulary.</li> <li>Lack of public confidence in or awareness of OPCC (SR5).</li> <li>Partnership relationships damaged.</li> <li>Failure to understand people's priorities and issues re policing and crime and which could be biased by only hearing those individuals already proactive/engaged.</li> <li>Police and Crime Plan and delivery not aligned to public concerns and priorities (SR10 &amp; SR2).</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>PCC - Councillor forums</li> <li>PCC - Constabulary roadshow</li> <li>PCC engagement two days a week.</li> <li>Two new proposed roles created from the review including an Engagement &amp; Events Manager.</li> <li>External PR agency supporting engagement.</li> <li>Creation of an overarching strategic approach to communications to work in a more focused way on strategic priorities and objectives.</li> <li>Creation of tactical communications plans for particular workstreams (including public engagement/events) with ownership and delivery allocated to one person who is accountable.</li> <li>OCC/OPCC Corp Comms joint meetings.</li> <li>Calendar of regular media appearances / communications activities which will also link to national days or weeks where relevant.</li> <li>Oversight of Operation Remedy Communications Plan through ongoing meeting structure.</li> <li>Joint working with the Constabulary on EDI portfolio.</li> <li>Revised stakeholder mapping and management.</li> <li>New contact management system.</li> </ul>	Feb-23	Head of C&E	<ul style="list-style-type: none"> <li>9 forums taking place from October 22 - February 23</li> <li>Roadshow delayed due to capacity within C&amp;E team to support.</li> <li>VRU Comms role started 7 Nov. No appointable candidates in Nov 22 for E&amp;E role.</li> <li>Strategy has been developed for new PCC with overarching theme focusing on vulnerable and under-represented communities to build trust and confidence.</li> <li>Further delays due to capacity; this will be taken forward by new team member.</li> <li>New system replacing IKEN; launch delayed to 2023/24.</li> </ul>		
	Jan-23	Head of C&E			
	Dec-22	Head of C&E			
	Feb-23	Head of C&E			
	Mar-23	Director of P&A			

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Lack of public confidence in or awareness of OPCC	SR5	Chief of Staff	4	4	16
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	<b>16</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>● Risk that the new PCC fails to deliver on manifesto pledges and/or P&amp;C Plan.</li> <li>● A lot of negative media attention about the problems in policing - public confidence in the police is falling and this is inextricably linked to confidence in the PCC.</li> <li>● Failure to deliver outcomes in terms of disproportionality (ethnicity), VAWG or 'green agenda'.</li> <li>● Governance failure likely to damage confidence in PCC (SR1).</li> <li>● The increased visibility of performance presents both an opportunity and risk to confidence depending on that performance.</li> <li>● Limited resources within the OPCC to support meaningful and proactive engagement; staff vacancy has meant capacity reduced by 1/3 from Q3 21/22.</li> <li>● PCC engagement will increase contacts and raise expectations which the OPCC are not resourced to deliver.</li> <li>● Policing failures/adverse incidents (even at an operational level) can impact on the perception of the OPCC also.</li> <li>● Protests and police handling of them are a very divisive issue and these are likely to be more frequent.</li> <li>● Failure to engage with the diverse public (especially young people) and other stakeholders (SR4).</li> <li>● Failure to deliver the Police and Crime Plan (SR2).</li> <li>● Public expectation of the PCC role may not be matched by available funding or powers of the PCC.</li> <li>● Failure of the Constabulary to deliver Op Uplift or failure to improve outcomes.</li> <li>● Court backlogs and national rape crisis reduces confidence in the entire criminal justice system.</li> <li>● Misconduct hearings for police officers may be delayed or LQCs may be risk averse due to potential personal liability in relation to sanctions. Fewer LQCs available.</li> </ul>		<ul style="list-style-type: none"> <li>● Loss of legitimacy in the OPCC.</li> <li>● Failure to demonstrate value for money.</li> <li>● Could undermine the working relationship between the Constabulary and OPCC.</li> <li>● Police and Crime Panel failure to support precept increases.</li> <li>● Low voter turnout in PCC elections.</li> <li>● Loss of political support for the need for PCCs.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>● Police and Crime Plan 2021-25 raises profile of work of OPCC.</li> <li>● Improve data capture about confidence in the PCC.</li> <li>● Engagement activity recorded against SR4 is the primary direct mitigation against this risk.</li> <li>● Discharging good governance (SR1) and delivery of the Police and Crime Plan (SR2) are critical to ensuring confidence in the PCC.</li> <li>● Gold Groups manage critical issues of public confidence.</li> <li>● Regional LQC lists being explored.</li> </ul>	Jan-23	CoS Director of P&A Head of C&E PCC / CoS	<ul style="list-style-type: none"> <li>● Final version published Jan 22. Launch and digital platform delayed due to capacity.</li> <li>● 34.5% of precept survey respondents and 26.7% local survey respondents (2 Qs) had confidence in the PCC.</li> </ul>		
	Jan-23				
	Jan-23	Head of C&E Director of P&A	<ul style="list-style-type: none"> <li>● The OPCC has a standing invite to all Gold Groups.</li> </ul>		



Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Lack of capacity, capability or poor wellbeing within the OPCC	SR6	CoS	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	<b>16</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Several of the team are struggling with stress and absence is increasing. People feeling exhausted and overwhelmed with work (Nov 22)</li> <li>Capacity/demand still an issue while roles are being recruited (Nov 22).</li> <li>Lack of HR support for the Head of HR &amp; BS.</li> <li>Additional engagement by PCC increasing demand on OPCC.</li> <li>Demand too high for current resource levels - no clear direction on demand reduction.</li> <li>Loss of skills and experience including senior roles and four maternity leaves and cover in 2021-23.</li> <li>Change to OPCC structure and roles as a result of the review commissioned by the PCC.</li> <li>Small size of the organisation and varied specialisms also makes building resilience challenging.</li> <li>A number of single points of failure within the OPCC (can cause risk to materialise temporarily during periods of prolonged absence).</li> </ul>		<ul style="list-style-type: none"> <li>Increased likelihood of materialisation of all other strategic risks through delivery failure.</li> <li>Delivery of work is late or not to standards of quality desired.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>OPCC is subject of review led by the Chief of Staff.</li> <li>Resource planning is part of OMB and informal SLT - all vacancies are being filled.</li> <li>Create Wellbeing Strategy</li> <li>Health and Wellbeing Passports to be launched</li> <li>Create Development Plan</li> <li>PDR process and regular supervisory sessions.</li> <li>Annual staff survey which forms the basis of a delivery plan.</li> <li>Skills matrix maintained.</li> <li>Training and development budget maintained.</li> <li>Salary levels set at a reasonable market rate and in line with other OPCCs.</li> <li>Regular team meetings to share knowledge and resolve issues.</li> <li>Values and teamwork embedded and recruited to improving retention.</li> </ul>	Dec-22	CoS  SLT Head of HR & BS SLT CoS  SLT CFO CoS/CFO SLT SLT	<ul style="list-style-type: none"> <li>New organisational structure implemented 1 Nov.</li> <li>Business Plan and related workstream tracker published.</li> <li>Several new roles filled internally, further recruitment taking place throughout Q3/Q4 22/23.</li> <li>Phoenix Life &amp; Wellbeing Coaching will be supporting SLT and new directorates.</li> <li>New PDR process launched Oct 22.</li> <li>Pulse survey run in March 22 showed 83% were happy or very happy at work. However 57% rated their wellbeing at work positively, and only a third commented positively on work-life balance. Pulse survey conducted in Nov 22; results will be analysed and published. Full staff survey pushed back to Q4 22/23.</li> <li>Skills matrix refreshed as part of the review with organisational and team requirements identified. However the OPCC will need to identify where there are skills gap for people in those roles and provide appropriate development.</li> </ul>		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to deliver commissioned services	SR7	Director of PP&C	4	3	12
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	3	<b>12</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Victims Bill may introduce additional duties and demand but without funding to support.</li> <li>Inflationary pressures on these services - some working on the same budget for many years.</li> <li>Increasing demand.</li> <li>Backlogs in Lighthouse (the primary commissioned service).</li> <li>Lack of robust performance framework around commissioned services.</li> <li>Additional demand on victim support services; particularly DA and SV.</li> <li>Significant additional reporting requirements for compliance purposes.</li> <li>Services without sustainable funding and cliff-edge arrangements.</li> <li>Contracts ending in March 23 - sexual violence therapeutic services, BASE and Adult Appropriate Adult services</li> </ul>		<ul style="list-style-type: none"> <li>Failure to support victims particularly vulnerable victims - PCP Priority 1 (SR2).</li> <li>Loss of public confidence in or awareness of OPCC (SR5).</li> <li>Relationship with Constabulary and partners.</li> <li>Reduction or withdrawal of victims grant from Government.</li> <li>Failure to devolve further funding/commissioning.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>Re-commissioning process for services ending March 23.</li> <li>Commissioning Strategy being developed for Q3 22/23.</li> <li>Lighthouse victims' service jointly established with the Constabulary: service under joint review.</li> <li>Maintain a sufficiently resourced and prioritised commissioning team within the OPCC.</li> <li>Victim Services Provider forum and AWP Partnership Board are regular joint strategic meetings with commissioned services.</li> <li>Scan and apply for additional funding as available.</li> </ul>	Dec-22 Jan-23 Feb-23	Director of PP&C Director of PP&C Director of PP&C  Director of PP&C Director of PP&C  Director of PP&C	<ul style="list-style-type: none"> <li>Processes commenced with each process owned by a Senior PP&amp;C Manager.</li> <li>Reported to GSB in Oct 22. Business Case to be refined and update brought to GSB in Dec 22. PCC will consider withdrawing MoJ grant funding if there is not sufficient confidence in the plan.</li> <li>PP&amp;C team at full establishment after review process.</li> <li>£1.6 million in additional funding achieved in 2021/22.</li> </ul>		



Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to deliver effective and efficient collaborations with other forces	SR8	Chief of Staff	4	3	12
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	3	<b>12</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>SWROCU projected to fall short of Uplift target for 31/03/23.</li> <li>Challenges with staff retention and capacity in South West Forensics.</li> <li>Ineffective governance and scrutiny over existing collaborations.</li> <li>Failure to agree effective models for collaboration.</li> <li>Increased funding for police means the imperative to collaborate is not so pressing.</li> <li>Ineffective governance and ownership of regional projects and programmes.</li> <li>Tension between local forces and collaborations in terms of competing interests and lack of uniformity of people and processes.</li> <li>Lack of direct influence/control in order to make changes i.e. everything must be done by (multi-force) committee.</li> <li>NPAS, which A&amp;S OPCC are the regional lead for, is particularly challenging.</li> </ul>		<ul style="list-style-type: none"> <li>Governance failure as a duty of the PCC (SR1).</li> <li>Failure to deliver value for money.</li> <li>Failure to deliver specific services provided by existing collaborations.</li> <li>Inefficient compared to other regions/areas.</li> <li>Criticism from HMICFRS.</li> <li>Government scrutiny/intervention.</li> <li>Lack of resilience otherwise provided by a collaboration.</li> <li>Forced to accept others terms from future alliances or mergers.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>SW Chief Constables working through options for SW Forensics.</li> <li>South West Regional PCCs are politically aligned and have agreed to collaborate.</li> <li>Strategic Collaboration Governance.</li> <li>Regional commissioning and programme boards and policy officer.</li> <li>SWAP appointed as Internal Auditor (from April 2019) - working in partnership with other regional forces.</li> <li>Regional ACC is in place (in line with HMICFRS recommendations).</li> </ul>	Dec-22 Dec-22	CoS CoS CoS CFO CFO	<ul style="list-style-type: none"> <li>Further review at December SW Strategic Board.</li> <li>SW Regional Policy and Research Officer started in 2022. Improving governance of collaboration performance is one of their workstreams.</li> <li>Op Scorpion - regional anti-drugs operation - has taken place twice in 2022 with a further operation planned later in the year.</li> </ul>		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to deliver effective and efficient collaborations or outcomes with other partners	SR9	Chief of Staff	4	4	16
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	3	<b>12</b>
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> <li>Lack of control/influence over other criminal justice agencies.</li> <li>New duties and expectations of PCCs arising from the national review. PCCs appear to have extra responsibility but without additional 'levers' to support delivery.</li> <li>Partner funding remains under pressure with financial settlements not keeping pace with inflation and demand. This increases the risk of demand and funding requests moving to the ASC and OPCC.</li> <li>Macro-economic factors could have a detrimental effect on partners, particularly Local Authorities. This financial position could cause partners to withdraw or reduce levels of service to partnerships.</li> <li>Failure to put in place effective governance and ownership of partnership working.</li> <li>Differing priorities and leadership of agencies.</li> <li>Changing political and economic landscape can make partnership working more challenging.</li> <li>Lack of meaningful 'live' information sharing.</li> <li>Lack of OPCC oversight of safeguarding across A&amp;S.</li> </ul>		<ul style="list-style-type: none"> <li>Governance failure as a duty of the PCC (SR1).</li> <li>Failure to deliver the Police and Crime Plan (SR2).</li> <li>Failure to deliver a whole systems approach to crime and continue the 'revolving door' of offending and victimisation.</li> <li>Failure to deliver value for money.</li> </ul>			
<b>MITIGATION</b>					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> <li>Development of local police and crime [community safety] plans for each CSP area.</li> <li>Partnership Strategy being developed for Q4 22/23.</li> <li>PCC chairs LCJB and OPCC continue to be represented at CSPs, Children's Trusts, Health and Wellbeing Boards.</li> <li>Meetings (outside of Boards) with LA chairs/CEOs; CSP Chairs.</li> <li>PP&amp;C team have leads for victims, CJS and reducing re-offending.</li> <li>Violence Reduction Units.</li> <li>PCC applying to sit on Fire Authorities.</li> <li>Information sharing relevant to all partnership working; particularly CJ, reducing reoffending and VRUs.</li> </ul>	Dec-22 Jan-23	Director of PP&C Director of PP&C CoS  CoS Director of PP&C Director of PP&C CoS Respective Strategic Groups	<ul style="list-style-type: none"> <li>BANES, N Somerset, Somerset &amp; S Glos have had content approved by respective Boards. Bristol target date pushed back to Nov. OPCC will coordinate design and publication of these.</li> <li>HO confirmed A&amp;S increased funding for 2022/23 - 2024/25.</li> <li>PCC accepted onto D&amp;SFRS; need to attend AFRS Authority meeting to progress.</li> <li>PCC Chairs multi-agency Data Accelerator Group.</li> </ul>		



<b>MEETING NAME</b>	<b>DATE</b>	<b>AGENDA NO</b>
Joint Audit Committee & Constabulary Management Board	14 <sup>th</sup> December & 22 <sup>nd</sup> December 2022	Item 7 (JAC) Item 4.2 (CMB)
<b>DIRECTORATE / DEPARTMENT</b>	<b>AUTHOR</b>	<b>COG SPONSOR</b>
Portfolio Management Office	9796 Michael Flay, Governance, Risk and Organisational Learning Manager	DCC Watson
<b>NAME OF PAPER</b>	<b>PURPOSE OF THE PAPER</b>	<b>SESSION</b>
Constabulary Corporate Risk Register Report	Information	Open

## 1. PURPOSE OF REPORT

This report provides the Joint Audit Committee (JAC) members with a summary of Avon and Somerset Constabulary (ASC) Corporate Risk Register. Following the JAC meeting, this paper will be presented to the Constabulary Management Board on 22<sup>nd</sup> December 2022.

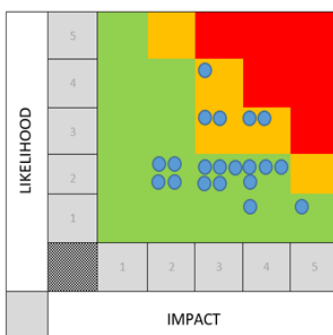
The content of this report was informed by the outcomes of the Risk Management Advisory Group meeting held on Tuesday 22<sup>nd</sup> November 2022.

## 2. QUARTERLY ANALYSIS OF OUR ORGANISATIONAL RISK REGISTER

The constabulary has (as of 21<sup>st</sup> November, date of drafting this report), a total of **158** risks captured across our organisational risk register. This figure represents an increase from the last reporting period of **21** additional risks being identified and managed. The primary driver for the increase in overall numbers of risks during the previous 3 corporate risk reports is the embedding of risk management practices at directorate level. Our Improvement Consultants across our Directorates and Department are engaged in supporting the leaderships teams with risk capture and ongoing review, and continues to evolve and mature as colleagues build confidence and knowledge in our ways of working.

Through the analysis undertaken, we have produced a selection of 'heat maps' of organisational risk type, showing the overall number of risks by type based on their mitigated assessment of likelihood and impact of materialising. See Figure 1 below.

### Governance



**Key: Likelihood & Impact definitions**

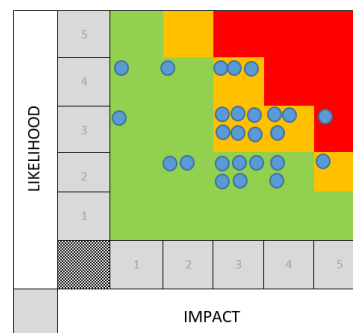
**Likelihood:**

1. Very Unlikely
2. Unlikely
3. Possible
4. Likely
5. Very Likely

**Impact:**

1. Negligible
2. Minor
3. Moderate
4. Significant
5. Severe

### Financial



**Key: Likelihood & Impact definitions**

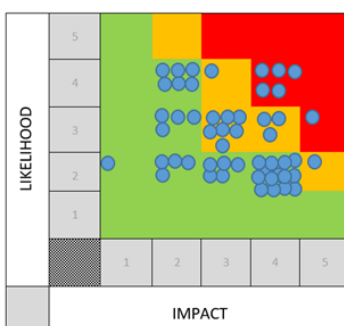
**Likelihood:**

1. Very Unlikely
2. Unlikely
3. Possible
4. Likely
5. Very Likely

**Impact:**

1. Negligible
2. Minor
3. Moderate
4. Significant
5. Severe

### Service Delivery



**Key: Likelihood & Impact definitions**

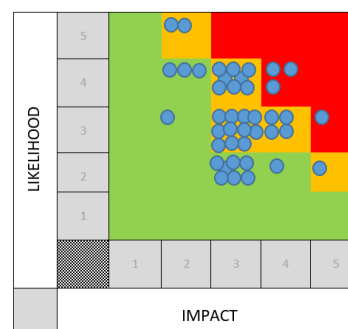
**Likelihood:**

6. Very Unlikely
7. Unlikely
8. Possible
9. Likely
10. Very Likely

**Impact:**

6. Negligible
7. Minor
8. Moderate
9. Significant
10. Severe

### People



**Key: Likelihood & Impact definitions**

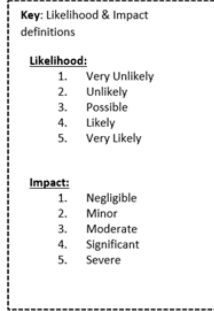
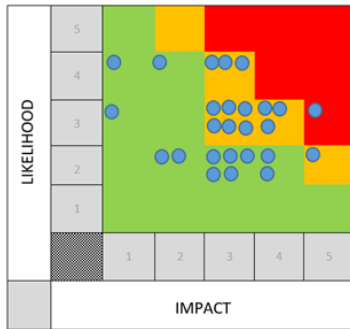
**Likelihood:**

6. Very Unlikely
7. Unlikely
8. Possible
9. Likely
10. Very Likely

**Impact:**

6. Negligible
7. Minor
8. Moderate
9. Significant
10. Severe

### Information Governance, Digital and Data



### Infrastructure and Assets

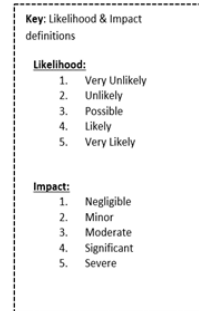
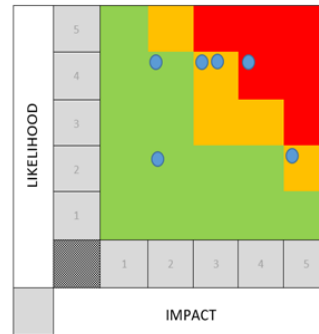


Figure 1: Six heat maps visualising the risk type categories and assessed level of mitigated risks within each category using data from the organisational risk register.

## 3. CORPORATE RISK REPORT - HEADLINES

The six corporate risks records, with the page numbers for each record within this report are listed below

Full details for each risk, including rationale for risk score changes can be found in the update section of the corporate risk records on the relevant page of this report.

**Corporate Risk 1:** Pages 4 through 8

**Governance arrangements are not understood, appropriately applied and are ineffective**

The risk management advisory group have taken the decision to **retain** the current risk score, with the unmitigated assessment rising from remaining as **12**, and the mitigated assessment remaining as **9**.

**Corporate Risk 2:** Pages 9 through 13

**Inability to deliver a sustainably balanced budget**

The Chief Finance Officer has taken the decision to **retain** the current risk score, with the unmitigated assessment rising from remaining as **25**, and the mitigated assessment remaining as **16**.

**Corporate Risk 3:** Pages 14 through 17

**Failure to meet expectations of improved performance and service delivery**

The risk management advisory group have taken the decision to **retain** the current risk score, with unmitigated assessment as **20** and the mitigated assessment of the risk being **12**.

**Corporate Risk 4:** Pages 18 through 22

**Failure to grow, develop and then maintain the workforce and leadership culture, capacity, and capability**

The risk management advisory group have taken the decision to **retain** the current risk score, with unmitigated assessment still being **20** and the mitigated assessment of the risk remaining at **15**.

**Corporate Risk 5:** Pages 23 through 26

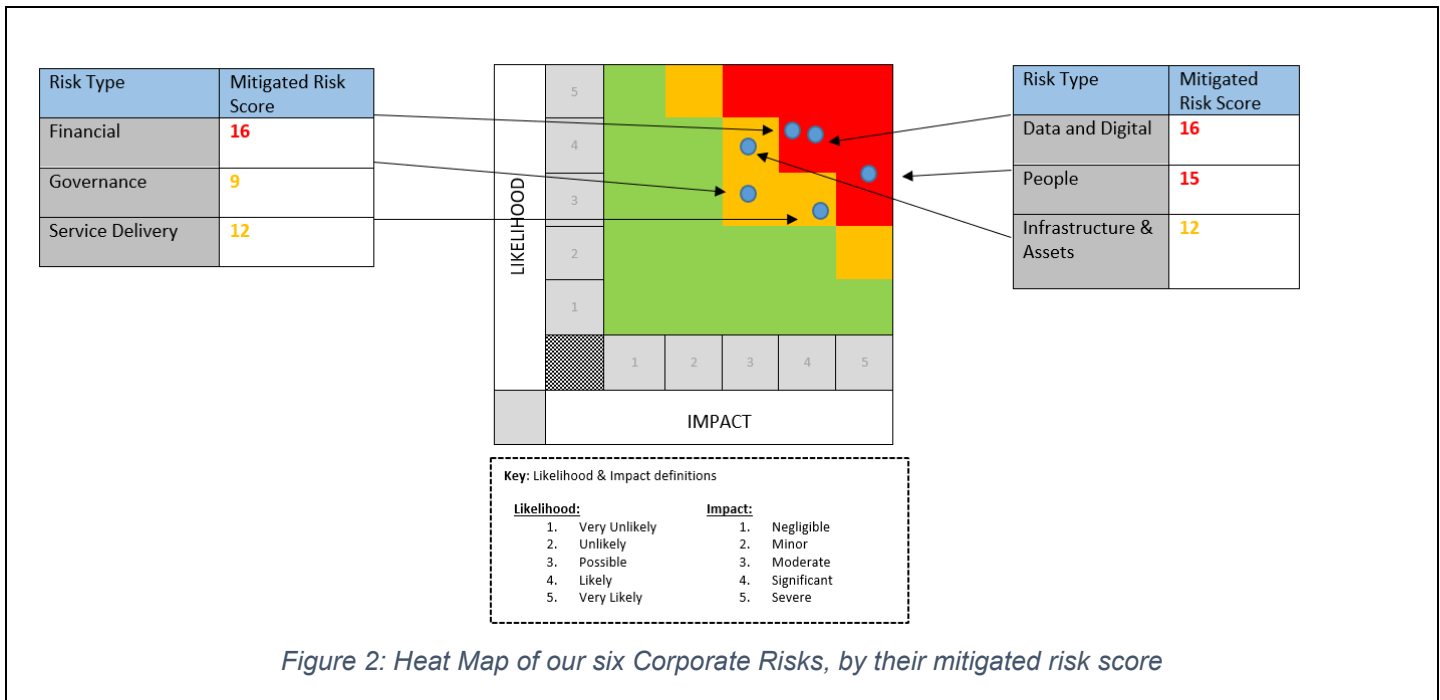
**Information Governance practices, data and digital assets are not governed and controlled or used legitimately, ethically, appropriately, or effectively for policing purposes**

The risk management advisory group have taken the decision to **retain** the current risk score, with unmitigated assessment still being **20** and the mitigated assessment of the risk remaining at **16**.

**Corporate Risk 6:** Pages 27 through 29

**Failure to maintain, invest in or optimise our infrastructure and assets**

We have taken the decision to **retain** the current risk score, with unmitigated assessment as remaining at **15** and the mitigated assessment of the risk increasing to **12**.



#### 4. SWAP AUDIT Q3 2022/23

During this reporting period, we have been subject to a follow up audit of our Risk Management framework by our internal auditors. I have been the business lead for the audit, working with the lead auditor, Jake Sibbert, from SWAP. The Constabulary has provided approximately 30 separate pieces of documentation to support the auditors review, this included items such as:

- Terms of Reference for CMB, and its sub-committees, this meeting, and where available Directorate Leadership Meetings
- Copies of meeting capture notes from CMB (when the corporate risk report is featured)
- Copies of meeting capture notes from the last 4 months of the People, Finance and Asset and Confidence and Legitimacy committees
- Copies of the risk register reports that are presented at the above-mentioned committees
- Copies of last 3 Corporate Risk Register reports, which are submitted to Joint Audit Committee
- Copy of the Risk Management Procedural Guidance
- Copy of the documentation provided to the Risk Management Advisory Group

The final report will be presented to the Joint Audit Committee in December 2022.

#### 5. RECOMMENDATIONS FOR THE COMMITTEE

There are no specific recommendations to present to the committee. I welcome your observations and feedback on content of this report and will be available to respond to members questions during the meeting.



## Corporate Risk 1: Governance

December 2022

### Corporate Risk - overview information

<b>Corporate Risk URN</b>	PR000740	<b>Current Mitigated Score</b>	9
<b>Corporate Risk Title</b>	<b>Governance arrangements are not understood, appropriately applied and are ineffective</b>	<b>Mitigated Impact Score</b>	3
<b>Corporate Risk Owner(s)</b>	Sarah Crew, Nikki Watson, Nick Adams, Dan Wood, Jon Reilly, Will White	<b>Mitigated Likelihood Score</b>	3
		<b>Date of Risk Review</b>	28/02/2023

<b>Corporate Risk Description</b>	We are very clear on our vision to provide outstanding policing. Within a professional environment as large and complex as Policing, effective and well-understood governance arrangements are critical to keeping us on track. A robust governance framework will help us ensure we are fulfilling our mission to Serve, Protect and Respect Avon and Somerset's communities. Furthermore, it will enable the delivery of our vision for outstanding policing. The starting point for good governance is having absolute clarity on the rules within which we choose to (and indeed must) operate to ensure consistent, transparent, evidence-based and ethical decision making.
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### Corporate Risk initial assessment - unmitigated risk

<b>Unmitigated Assessment</b>	12
<b>Unmitigated Impact Score</b>	4
<b>Unmitigated Likelihood Score</b>	3

**Rationale**

The constabulary adheres to the CIPFA\*: Delivering Good Governance in Local Government (2016) framework, which sets the standard for local authority governance in the UK. Furthermore, the publication of the International Framework: Good Governance in the Public Sector (CIPFA/IFAC\*\*, 2014), contains seven principles for good governance applicable to local government, which the constabulary has adopted and built its own governance framework around. The principal statutory framework within which the corporations sole (ASC and OPCC) operate includes the following:

- Police Reform and Social Responsibility Act 2011
- Policing Protocol Order 2011
- Financial Management Code of Practice (Home Office, 2013)
- Strategic Policing Requirement (Home Office, 2015)

Without a framework in place to adhere and comply with the requirements outlined in these frameworks, we would be vulnerable to scrutiny from several sources, and exposed to reputation damages undermining confidence in policing.

We also recognise that the scheme of governance between the Constabulary and Police and Crime Commissioners Office is yet to be refreshed since the change of PCC. We will need to reflect and respond accordingly to any changes in an update version of the scheme, introducing controls into our governance framework.

**Corporate Risk latest assessment - mitigated risk**

<b>Mitigated Assessment</b>	<b>9</b>
<b>Mitigated Impact Score</b>	<b>3</b>
<b>Mitigated Likelihood Score</b>	<b>3</b>

## Rationale

A joint scheme of governance is established between the Constabulary and Office on the PCC, as required under statutory frameworks noted above. The primary purpose of the Scheme of Governance is to:

- Set out the respective roles of the PCC and Chief Constable;
- Set out the common understanding and agreed ways in which certain functions will be governed and managed to enable proper and effective management of the Constabulary
- Set out the delegations by the PCC and the CC to give effect to that common understanding
- Incorporate Financial Regulations and Standing Orders relating to contracts.

The Constabulary has provided feedback on the planned refresh of the joint scheme of governance, we are awaiting further communication on the timescales for the finalisation of the new framework from the commissioners office.

The constabulary implemented its current governance framework in February 2021 which has been described in our Governance Framework Handbook, available on our Intranet pages. Our framework aligns to to the seven CIPFA principles of good governance, and as part of the CIPFA framework compliance, an annual governance statement is written each year to accompany the annual statements of accounts, providing an annual checkpoint for an internal self-assessment of our governance, risk management and internal controls. This document is made available to the public.

Each meeting in our governance framework has a defined Terms of Reference (ToR), which are monitored regularly and updated, formal annual reviews as part of our internal controls. The ToR for each meeting specific the level of responsibility and scrutiny monitoring service delivery and business functions. Further internal controls are referenced in the Governance Handbook, such as Risk Management, Change Commissioning, Performance Management and Assurance Management.

The OPCC has launched its Performance and Accountability Board, as well as the Governance and Scrutiny Board following a review of their governance arrangements in how they hold to account the Chief Constable and her team for the delivery of policing services.

We are making significant progress with the planning and implementation of the recommendations from the Leapwise review. Their final report was presented in June 2022, and alongside recommendations for improvements there was acknowledgement of our "**clear, comprehensive model**" aligned to CIPFA principles and a level "**exceptional documentation**", specifically our Governance Handbook which clearly outlines governance structures and practices, and documentation is regularly updated for Committees.

Our Portfolio Management Office have written a delivery plan of activity and have already completed several of the required activities. These include:

- Rewriting of governance committee terms of reference, incorporating changes such as overall reduction in meetings, revised focus on specific themes and a review of membership for each forum
- Revised templates for governance documentation have been designed and went live for the October cycle of governance meetings.
- Producing guidance for deployment of micro-commissioning menu in Governance Meetings for Chairs
- Producing briefing notes for meeting chairs and presenters to support the right behaviours and culture.

Our new governance committee, the Change Portfolio Committee, was launched in October 2022, with a quarterly cadence scheduled through until March 2024. We have now scoped the terms of reference for an Improvement Committee, which will be chaired by the Assistant Chief Constable for Neighbourhoods, Partnership and Response. The scope of the committee is to provide management, scrutiny, and assurance specifically of the delivery of improvement activities from the Constabulary Single Delivery Plan, HMICFRS recommendations and our Integrated Performance and Quality Report recommendations. The committee will also act as the conduit to track progress of other improvement outputs from formal Constabulary Governance Framework meetings.

Our Governance Handbook is now being re-written to reflect these changes, with a target delivery date of end of January 2023.



**Earlier assessments**

Mitigated risk score Q4 2021/22
Mitigated risk score Q1 2022/23
Mitigated risk score Q2 2022/23
Mitigated risk score Q3 2022/23

8
9
9
9

**Corporate Risk - audit trail of risk management**

<b>Date of update</b>
28/11/2022
05/10/2022

<b>PMO notes</b>
<p>The Risk Management Advisory Group reviewed this risk on 22nd November 2022. We acknowledge the progress being made with the implementation of the final recommendations from the Leapwise Governance review.</p> <p>We are now in the final stages of design and implementation of the technical changes to the governance framework, the wider understanding of which are underpinned by the Governance Handbook product. However, we need to consider what cultural barriers might undermine the effectiveness of the changes and work with our senior leaders to ensure we have the right behaviours being modelled.</p> <p>The position for Quarter 3 2022/23 remains unchanged, with the unmitigated risk value of <b>12</b> and the mitigated (residual risk) value of <b>9</b> remaining unchanged from Quarter 2.</p> <p>The next planned review of this risk will take place in February 2023.</p>
<p>The risk was reviewed by the Risk Management Advisory Group on 5th October 2022.</p> <p>Good progress is being made with the planned changes to the governance framework, but as these are not yet fully implemented, we took the decision to <b>retain</b> the current level of risk score (<b>9</b>), and intend to review this position again in December.</p> <p>By the time we review this risk again in December, we are optimistic that all recommendations will be complete and we can assess the risk with a view to reducing the mitigated score.</p>

28/06/2022	<p>The risk was reviewed by the Risk Management Advisory Group on 28th June 2022.</p> <p>While we have been fairly stable through Q1 of 2022/23, we know that in Q2 and beyond, we will make changes to the governance arrangements following the Leapwise review recommendations. There is a considerable amount of planning, coordination and communication to ensure that the changes being made to our governance structure are understood and appropriately executed by internal stakeholders. In addition, there is a requirement to refresh several documents such as Terms of Reference(s) and the Governance Handbook, which the review cited as 'exceptional documentation'.</p> <p>Effective risk management is forward looking, and we know the challenge ahead of us is to successfully implement the recommended improvements and without clear communication and execution of the change, the understanding and application of governance may be affected.</p> <p>It is for these reasons, we have <b>increased</b> to the <b>unmitigated score to 12</b> and the <b>mitigated score to 9</b>, to be reviewed again in September 2022 when the implementation is under way / complete in respect of changes to the governance framework.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 14th September 2022.</p>
16/02/2022	<p>This risk was reviewed at the Risk Management Advisory Group on 15th February by members of Chief Officer Group. The content the risk record was agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>10</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>8</b>.</p> <p>Our rationale for the risk being reduced is that we believe that we have implemented the processes, structures and guidance to support the discharge of effective governance across the organisation. The restructuring of the organisation enabling services in 2021 created the Portfolio Management Office, whose remit is to provide enterprise level support across our corporate change projects, governance, risk management and strategic planning cycle.</p> <p>Our new governance framework has bedded down into the organisation over the last 12 months and the focus is now shifting to optimising our leadership and culture to make our decision-making even more effective, through the work with Leapwise.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 28th June 2022. At this time, we will have received conclusions from Leapwise in their assessment of our governance arrangements.</p>



Rationale

will present challenges, and therefore will work closely with the OPCC to understand if any different scenarios should be modelled and considered. In broad terms each £1 on our precept generates c. £0.6m in additional funding;

The Home Office has continued to acknowledge the need for a review of the formula used to distribute grant funding and has commissioned work to formally review this. In 2022/23 Avon and Somerset will receive the equivalent of £122.98 per head of population in grant funding, compared to a national average of £153.66 – an overall difference the equivalent of £52.7m. While we would be hopeful that the review into the formula goes some way to addressing this position, we recognise the uncertainty of the review and the will to see the outcome fully implemented. We are therefore making no assumption as to whether the review results in an increase or decrease to our grant funding position, but will continue to keep this in view;

We recognise several revenue cost uncertainties in the short and medium term, including: -

- Inflationary pay increases expected annually – Our last MTFP (as of February 2022) assumed that pay would increase by 3.5% in 2022/23, 2.5% in 2023/24 and 2% in 2024/25, in line with NPCC position. The actual pay award for officers was settled with an increase of £1.9k to each spinal point throughout the ranks. The police staff pay award was originally settled at 2.1% (w/e from April not September as has been tradition), however this is subject to renegotiation and is expected to be brought more in line with that agreed for police officers. The cost of this exceeds our 3.5% assumption, however additional grant funding has been made available (£140m in total for policing in 22/23) which partially offsets these cost pressures. Future pay awards are likely to exceed our previous assumptions, and consequently we recognise there will be need to adjust these assumptions as part of our new MTFP. We will work closely with regional and national forces to ensure our assumptions mirror those being made by others;
- Incremental pay increases driven by an inexperienced workforce becoming more experienced over time will increase the average cost of an officer in the long term. The impact of this is unlikely to be felt until the final years of the MTFP and beyond, and therefore is likely to be a key area of discussion as part of the next Spending Review discussions.
- Pensions costs are likely to see increases in employer contribution costs because of valuation exercises which are ongoing at present. These valuations will consider a range of factors, including the impact of the wider economic challenges and the costs and impacts of delivering McCloud remedy. These valuations will set employer contribution rates for police staff pensions w/e from April 2023 (initial indications are an increase in the employer contribution rate by 2.3%, offset by reductions to the deficit recovery lump sum payment) and for police officer pensions w/e from April 2024 (which we won't know until autumn 2023).
- Inflationary non-pay cost increases rising significantly in the short term particularly driven by areas such as utilities and fuel, because of increases in the wholesale markets for these commodities driven by a range of geo-political factors. Current forecasts suggest significant increases for gas and electricity, albeit we have been able to mitigate this to some extent through the pricing basket we are part of under the Crown Commercial Services (CCS) framework agreements. Likewise, fuel is also expected to see further increases, despite the recent reductions in pump prices from their peak earlier in the year. We also recognise wider pressures in other non-pay budgets as a consequence of these challenges, and are seeking to mitigate as much as we can through continued regional procurement activity – with recent successes including the new custody healthcare contract for all Southwest forces which commenced on 1st October 2022;

Capital projects are driven by mixture of local and national factors: -

- The Emergency Services Mobile Communication Programme (ESMCP) is a national programme, led by the Home Office, to replace TETRA radio with a digital alternative. We know that to deliver this programme locally will require significant local investment in medium term, but recent announcements have confirmed that this project is unlikely to see the changeover to new devices happen until towards the end of the current decade. The costs of this project remain significant, and therefore we will need to ensure our longer-term planning retains the funding to support this project;
- The replacement of our Enterprise Resource Planning (ERP) systems requires local investment, This project is progressing, with procurements now completed and expectation that the FBC will be approved in October enabling this project to progress into implementation phase towards an expected go live of our new systems from April 2024;
- Estates projects informed by our local estates plans and carbon reduction ambitions and expectations will require investment. This includes both larger scale projects (e.g., Trinity Road police station in Bristol, Yeovil police station) through to smaller scale

- refurbishment projects to ensure our estate continues to support and enable effective operational policing;
- IT Infrastructure and personal issue assets need to be replaced over the medium term, including a gradual transition into the cloud thereby resulting in a transfer of previous capital costs into revenue, all of which needs to be planned for through our MTFP;
  - Fleet replacement is required to maintain and refresh our fleet of c. 1,000 vehicles. Supply chain pressures mean that we are having to plan further and further into the future in order to ensure we are placing orders in sufficient time so as to ensure we retain sufficient availability of our fleet to maintain operational effectiveness.

Our Reserve levels are sustainable over medium term and will be informed by annual risk assessment completed by PCC CFO.

We know that over the medium term continued revenue savings will be required to balance the budget. This will remain the case as long as increases to our funding continue to not keep pace with the increases in our costs. Our last MTFP identified that we would need to find c. £6.5m by 2026/27 to balance the budget. We are working on our new MTFP which is likely to show that the requirement for savings has grown significantly considering inflationary pressures. We will therefore need to carefully plan where we can achieve savings alongside continuing to deliver and sustain the officer uplift, with it being likely that we will need to rely on reserves to balance our 2023/24 revenue budget.

### Corporate Risk latest assessment - mitigated risk

<b>Mitigated Assessment</b>	<b>16</b>
<b>Mitigated Impact Score</b>	4
<b>Mitigated Likelihood Score</b>	4

## Rationale

Where possible we will ensure that the **assumptions**, we include within our new MTFP, both for funding and for costs, are benchmarked against those of other forces, to ensure that these remain appropriate in our context.

We recognise within our cost forecasts that there are several areas where we have more **immediate cost pressures** which we know will not continue into the medium term. We intend to clearly identify these and make the case for funding through **use of reserves** as opposed to creating short-term revenue savings pressures. These include: -

- The increases made to police officer starting pay agreed earlier in 2022, which will generate pressure in the current year and in 2023/24 because of the number of officers we will have on this entry pay level. However, thereafter our recruitment volumes are expected to reduce to maintain, rather than grow officer numbers, and consequently this will require less additional funding.
- The costs of support officers on our degree holder entry programme (DHEP). We have invested in this area to accelerate the growth in our detective numbers, however unlike PCDA, the cost of DHEP is not covered by the apprenticeship levy and therefore are funded directly from our budget. The costs of this are currently high, reflecting the number of officers introduced through this route. However, as our recruitment numbers settle back, we expect this cost to reduce in time.
- In further support of our ambitions to grow detective numbers we have introduced the use of targeted variable payments (TVP), to both reward those completing their detective accreditation and those who are already accredited and who remain in post. We expect the use of this to continue while we grow our detective numbers. Once our detective numbers have been grown and stabilised, we anticipate reviewing and reducing our use of this temporary payment, thereby reducing the overall cost of this.

We recognise that **creating capacity** will be a key focus for us, both in terms of releasing the full potential of our officer uplift, but also in providing the opportunity to reduce cost. We already have emerging plans around areas of non-pay budgets, including some anticipated procurement savings as a consequence of our collaborative procurement with other southwest forces. In addition, we recognise the potential to further unlock the potential for savings through leveraging existing and planned investments, including our innovative use of Robotic Process Automation, the introduction of a new ERP system and continuing to mature our annual planning processes to build upon a detailed understanding of our processes to better inform risks and opportunities.

We will carefully consider, in collaboration with the OPCC, the extent to which we anticipate the cost pressures created by inflation reflect long-term re-basing of our recurring revenue costs or are more reflective of a short-term blip in costs which could reasonably be expected to reduce back (at least some way) over the medium term. Where we are confident in this assessment, we will consider **use of reserves** to help with short-term smoothing of our budget position.

The PCC and the Police and Crime Panel have supported an increase in council tax precept of £10, the maximum possible, for 2022/23 financial year. Our current MTFP continues to assume an average council tax increase of £10 in 2023/24 and £10 again in 2024/25. Thereafter it assumes an increase of 2% p.a. We recognise that future precept decisions will need to be made against a backdrop of cost-of-living challenges, and consequently we will work closely with the OPCC to understand thinking and how we can best support this decision which will be made in February 2023.

## Earlier assessments

Mitigated risk score Q4 2021/22

12

Mitigated risk score Q1 2022/23

12

Mitigated risk score Q2 2022/23

16

Mitigated risk score Q3 2022/23

16

## Corporate Risk - audit trail of risk management

Date of update	PMO notes
21/11/2022	<p>This risk was reviewed by the Constabulary Chief Finance Officer on 17th November following the Autumn Statement 2022 announcement, on behalf of members of Chief Officer Group.</p> <p>There is no change to the unmitigated score of <b>25</b> or mitigated (residual risk) score of <b>16</b>. However, we have updated the narrative to reflect current understood position.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group in February 2023, however we will remain attentive to the current factors influencing the assessment of this risk and review it, should it be necessary, earlier than the planned date noted above.</p>
05/10/2022	<p>This risk was reviewed by the Constabulary Chief Finance Officer on 4th October 2022 on behalf of members of Chief Officer Group. The content of the risk record was reviewed and agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>25</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>16</b>, reflective of the inherent uncertainties that remain at this stage in our planning cycle against a challenging economic backdrop.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group in November 2022.</p>
28/06/2022	<p>This risk was reviewed by the Constabulary Chief Finance Officer on 28th June 2022 on behalf of members of Chief Officer Group.</p> <p>The content the risk record was reviewed and agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>15</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>12</b>.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 14th September 2022.</p>
16/02/2022	<p>This risk was reviewed at the Risk Management Advisory Group on 15th February by members of Chief Officer Group. The content the risk record was agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>15</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>12</b>.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 28th June 2022.</p>



## Corporate Risk 3: Service Delivery

December 2022

### Corporate Risk - overview information

<b>Corporate Risk URN</b>	PR000736	<b>Current Mitigated Score</b>	12
<b>Corporate Risk Title</b>	<b>Failure to meet expectations of improved performance and service delivery</b>	<b>Mitigated Impact Score</b>	4
<b>Corporate Risk Owner(s)</b>	Sarah Crew, Nikki Watson, Jon Reilly, Will White, Dan Wood, Nick Adams	<b>Mitigated Likelihood Score</b>	3
		<b>Date of Risk Review</b>	28/02/2023

<b>Corporate Risk Description</b>	<p>When we consider the expectations of policing from the public and current government, we recognise they expect improvements to be seen on the back of investment in policing following years of austerity. When we consider that over the last 5 years precept (council tax contribution) has increased 35%, with the backdrop of the 'additional' 20,000 new police officers pledged by the government and the media attention and public opinion of policing in the last 18 months, scrutiny of what we do has never been as fierce.</p> <p>The Beating Crime Plan sets out the government's approach to cutting crime: cutting homicide, serious violence and neighbourhood crime; exposing and ending hidden harms; and building capability and capacity to deal with fraud and on-line crime. Our performance against key metrics of the plan in ASC is measured and provided to the OPCC.</p>
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### Corporate Risk initial assessment - unmitigated risk

<b>Unmitigated Assessment</b>	20
<b>Unmitigated Impact Score</b>	5
<b>Unmitigated Likelihood Score</b>	4



**Rationale**

Our priorities are set out through various national frameworks and local priorities, which mean we continue to have a large number of expectations placed on us. At present these numerous plans remain complimentary of each other, but in light of organisational growing pains, detailed in Corporate Risk 4, it may become necessary to prioritise and focus on specific areas of improvement.

We recognise the relationship between this risk and Corporate Risk 4, as this risk manifestation of the challenge of delivering expected performance.

The political landscape in the UK has shifted somewhat since the last review (time of writing, October 202), with a new cabinet in government we will await to hear if they plan to continue with measures introduced by the previous leadership and what it means for policing moving forward.

There is also a new His Majesty's Chief Inspector of Constabulary, Andy Cook, who with the change of leadership is bringing a different focus on performance and outcomes.

During the pandemic, the National Public Confidence survey was paused and has not resumed now that we have returned to some semblance of the new normality. Our public confidence insights, which we know to be influenced by national policing narratives, media coverage and social commentary, are now informed by a local survey commissioned by the PCC.

**Corporate Risk latest assessment - mitigated risk**

<b>Mitigated Assessment</b>	12
<b>Mitigated Impact Score</b>	4
<b>Mitigated Likelihood Score</b>	3

Rationale

The Constabulary has developed its Performance Control Strategy, reported through the Integrated Performance and Quality Report (IPQR) which informs the Management Board (CMB) monthly of our performance. Our Performance Control Strategy has set the force level performance priorities for local focus and delivery, these six areas are:

- Crime Data Integrity
- Rape and Serious Sexual Offences
- Investigative Standards
- Response Timeliness
- Victim Contact and Follow up
- Case File Quality

We have considered the 6 areas of local service delivery focus in the performance control strategy and reviewed the reported performance measures against these between July and October 2022. Crime Data Integrity and Rape & Serious Sexual Offences have shown **strong improvement** over this time, with Investigative Standards and Case File Quality showing a **moderate improvement**, while Response Timeliness and Victim Contact/Follow up remains **stable**.

The framework is linked to key national (Beating Crime Plan outcomes, PEEL assessment) and local priorities (Police and Crime Plan priorities, our 16 key performance question self-diagnostics). Each report features detailed data analysis of our performance priorities with specific 'in-focus' spotlights each month on our some of our thematic performance areas.

A further suite of measures to assess our performance against the key areas (see list below) of the beating crime plan, and these are regularly reported to the Police and Crime Commissioners office.

**Priority Areas of Beating Crime Plan:**

- Reduce Murder and Other Homicide
- Reduce Serious Violence
- Tackle Drugs Supply and County Lines
- Reduce Neighbourhood Crime
- Tackling Cyber Crime
- Improve Victim Satisfaction, with a Particular Focus on Domestic Abuse Victims
- Better Criminal Justice Outcomes for Rape Cases

The most recent data (October '22) shows that ASC has stable trend / outlook over most areas of the plan outcomes, with a large increase in both volume of RASSO referrals and charge volumes for RASSO offences. Elsewhere, there has been a reduction in the number county lines disrupted and in the number of drug trafficking offences.

Also taken into consideration during the review of this risk is the Public Confidence data, in which the 12-month rolling is 72%, which represents the lowest it has been in the 8 years the survey has been running. We are keen to commission work to understand the differences in the questions posed by the previous national survey and the local survey, commissioned by the PCC. We need to ensure we understand the key areas of concerns emerging and the themes among the public responses to inform our effective response.

Earlier assessments

Mitigated risk score Q4 2021/22

12

Mitigated risk score Q1 2022/23	12
Mitigated risk score Q2 2022/23	12
Mitigated risk score Q3 2022/23	12

### Corporate Risk - audit trail of risk management

Date of update	PMO notes
29/11/2022	<p>The Risk Management Advisory Group reviewed this risk on 22nd November 2022.</p> <p>We have reviewed the most recent performance data available, as noted above, and given the relatively short period of time between the last risk review and this review, there is little to no change in the key performance areas. Therefore, the position for Quarter 3 2022/23 remains unchanged, with the unmitigated risk value of <b>20</b> and the mitigated (residual risk) value of <b>12</b> remaining unchanged from Quarter 2.</p> <p>Prior to the next scheduled review in February 2023, there will be 3 months' worth of performance and quality framework reporting, public confidence survey reporting and another round of reporting in the Specified Information Order too, which will inform our continual assessment of this risk.</p>
28/09/2022	<p>The risk was reviewed by the Risk Management Advisory Group on 5th October 2022.</p> <p>Taking into consideration the performance information available, the decision was made to retain the risk score at its current score of <b>12</b>.</p> <p>We also reflected on the growing pains of the organisation and our limitations in terms of resources coming through recruitment, training and gathering the skills and experience in role to contribute towards effective service delivery. The interconnectivity between this risk and Corporate Risk 4 (People), is crucially important to reflect on when assessing this risk.</p>
28/06/2022	<p>The risk was reviewed by the Risk Management Advisory Group on 28th June 2022.</p> <p>After assessing the risk information available through our organisation risk register analysis and considering our latest performance data (June CMB), which shows strong improvement in our force performance priorities of Crime Data Integrity and Rape and Serious Sexual Offences, as well moderate improvement across Victim follow up and Investigative Standards and a stable position in our Case File Quality and Response timeliness, we have taken the decision not change the risk score, with remaining at a mitigated assessment of <b>12</b>.</p> <p>We also noted the fluctuating nature of the last two Public Confidence data sets, which saw a decrease before a recent upturn. These are influenced by national affairs and not always representative of the views of our communities, but none the less provide a baseline measure. The Deputy Chief Constable wishes to review the next set of data before factoring its insight into the decision making on this particular risk.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 14th September 2022.</p>
23/02/2022	<p>This risk was reviewed at the Risk Management Advisory Group on 15th February by members of Chief Officer Group. The content the risk record was agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>20</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>12</b>.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 28th June 2022.</p>



## Rationale

roles. Recruiting to target officer numbers does not immediately translate to a fully deployable officers on the front line and as a result our response timeliness rates are impacted. A more experienced, deployable workforce will happen, but it will take time to achieve.

- The growth in officer numbers does not immediately translate to the growth in specialist areas we want to grow. This is true across all specialist areas, and is particularly the case as we build our investigative capacity and capability. We have plans in place to realise this specialist growth, but again they will take time to fully realise. As a result our overall positive outcome rate remains too low at 12%, reflecting the continued efforts we need to make in improving investigative standards as we build capability.
- The changes introduced this year through the Attorney General guidelines for disclosure and the Director General guidelines for charging have created additional pressures on front line officers and staff. Un-addressed this has the potential to significantly impact on officer and staff capacity, undermining the benefits of officer Uplift. We are working with other forces to highlight these concerns and seek pragmatic solutions.

### **Attraction and retention in an increasingly challenging marketplace:**

- We are seeing locally and nationally increases against the projected leaver rates for police officers
- A number of roles have become 'harder to fill' as the pay rates in the market have risen quite rapidly and a lot in some areas, particularly where there are shortages for in-demand technical skills
- Many have talked about the impact of the pandemic on 'the great resignation' linked to employees re-evaluating what they want from their work and work/life balance
- Public sector pay has been relatively stagnant for some time with it be argued that police officers especially have fallen behind compared to cost of living increases and pay in other roles that are less complex, risky and demanding
- The attractiveness of policing as an 'employer' has taken a hit alongside wider trust and confidence following the widely publicised incidents of serious misconduct and concerns about sub-cultures in policing. This has a suppressive effect on our ability to recruit, especially from under-represented communities in whom there is already a trust deficit, and it also potentially dents morale and the ability to retain.

### **Institutionalising inclusion, investing in leadership and culture:**

- Serious questions have arisen about policing culture and leadership against the backdrop of declining public confidence in wake of a series of misconduct cases nationally and stubborn inequalities in the police workforce and service delivery
- Increase in volume and seriousness misconduct referrals/reporting and misconduct cases locally
- Stubborn disparities in workforce experience and service delivery adversely affecting under-represented communities especially and adding to a trust and confidence deficit; understandable concerns about the relative glacial pace of change in some areas/aspects of our work
- Growing levels of consciousness, internal and external activism, on the issues and impacts associated with inequality and discrimination, diversity and inclusion deficits
- Concerns from some that there is too much negative focus on the "<1%" and that this will dent morale of the majority
- A lack of understanding and acceptance in some quarters that there are deep systemic and institutional roots that also need confronting in a systemic way
- High levels of scrutiny and media attention to these issues
- Some reluctance and challenges in engaging all parts of the workforce in learning the knowledge and competencies we expect them to have in order to be able to promote an inclusive culture
- Impacts of wellbeing and procedural justice on behaviour
- Questions about the effectiveness and rigour of our recruitment/selection processes in identifying, predicting and addressing those who do not demonstrate the right values and behaviours joining policing
- Questions about the capacity of our internal professional standards, counter corruption, complaints and grievance management capabilities to meet need and demand
- Questions about the maturity and extent of our ability to use our data effectively to identify patterns or early warning signals to enable targeted and tailored intervention

Mitigated Assessment
Mitigated Impact Score
Mitigated Likelihood Score

15
5
3

Rationale

**Unprecedented growth and a changing workforce composition:**

- A tightly managed uplift programme with high-levels of collaborative and coordinated action across operations and enabling services which has so far met the targets largely thanks to good governance, forward planning, disciplined delivery controls, and pump-primed capacity increased to key delivery functions; careful tracking and monitoring of the data; lots of local, regional and national reporting and scrutiny
- An agreed clear uplift design for where the new resources will go within our operating model to achieve the benefits we are aiming for; a workforce planned approach to sequencing the on-boarding and posting of those resources in a controlled and considered way as the numbers and capabilities are realised
- Introduction of a wider range of entry routes and mechanisms
- Influencing national and local curriculum delivery to balance abstraction against the need to get the investment in learning right for now and the future
- Targeted focus on addressing the shortfall in detectives/investigations capability with a multi-faceted strategy
- Concerted efforts to minimise growing pains and implementation dip with a strategic approach alongside investments in leadership and culture development
- Focused programme of work to release productive capacity and minimise bureaucracy so that more time can be focused on what matters most
- Proactively continuing to work on internal engagement, narrative and communication through staff survey to avoid hazard fixation and to build hope, optimising and future focus

**Attraction and retention in an increasingly challenging marketplace**

- We are focused on a range of actions and activity to better understand what is driving attrition and retention and we have established a multi-pronged retention strategy.
- We are exploring interventions to address market pay challenges including market pay supplements and we are also considering where alternative means of meeting our resourcing requirements needs to be used, for example commercial arrangements with suppliers.
- Through our leadership and culture work and the action on the People Survey we are working to create an environment in which people want to stay and are positive about working with us. The People Survey shows agreement with 'I am happy at work' remaining high at 70% and high levels of people saying that they would recommend working for here to others.
- We have wherever possible introduced through the post pandemic resetting work measures to enable staff to benefit from hybrid/blended working which we know many value as it supports flexibility.
- We are working on the culture, trust and confidence issues as above and continue to present the many positive aspects of our organisation through our employer brand and through proactive positive communications.
- We continue to invest in a proactive outreach capability to shape and influence sentiment towards us as an employer and to support and encourage people to work for us, especially those from underrepresented communities.
- We're providing leadership to make clear the kind of behaviours and standards we expect and to promote a culture of Institutional Inclusion.
- We've gained a raft of industry awards for our work that set us out as a progressive, modern, and highly regarded employer

within our sector and beyond.

**Institutionalising inclusion, investing in leadership and culture:**

- We are in the process of strengthening independent confidential reporting systems
- We're accelerating a piece of work to enable us to exploit our data to provide early warnings and insight into patterns of behaviour to enable targeted preventative intervention
- We're investing further in our counter corruption capacity and capability
- We are going to make some considered investments to expand our internal communications and engagement capacity and capability so that we can influence and inform cultural change, including courageous conversations (which have started in earnest) and move the passive and disengaged
- We have used recognised industry standards and independent assessment to drive systemic improvement (e.g. NES, Workforce Equality Index Top 100 Employer, Disability Confident Leader, ENEI, CIPD People Awards); we continue to strive for further improvement achieve these to enhance our inclusive practices. We've drawn learning from our Recruit for Difference Pilot and we're tackling alignment through our selection processes.
- We have built a range of mechanisms for listening to employee engagement and measuring inclusion sentiment including our award winning People Survey and our response to it.
- We have invested in multi-layered training for leaders and practitioners to build confidence and capability, influence and inform including Inclusive Policing with Confidence in Partnership with local providers and Cultural Intelligence Training. We're investing in equipping leaders with tools, language and guidance to role model and lead for inclusion effectively.
- We engage in a number of positive action and developmental schemes designed to support progression of those from underrepresented backgrounds including Stepping Up.
- We are working systematically on the findings of the Desmond Browne report into disparities and have a rigorous governance and project discipline to oversee this. We have senior governance oversight of diversity and inclusion activity and results through both the Confidence and Legitimacy Committee and the People Committee.
- In total we have 1901 officers and staff booked to attend Leadership Courses in the next 3 months through the Leadership Academy.
- 60.4% agreement with Learning and Development theme in People Survey, representing a 5.9% increase on 2020 at a time when other themes saw reductions on last year; 11.2% increase agreement in 'there are opportunities for me to develop my career' since 2019;
- Leadership academy offers clear pathways or leadership journeys to support development and progress - to support this work, we have commissioned an external consultancy (Leapwise)
- Segmented development options from first line to senior leaders aligned to a national framework; substantial investment in leadership development for the whole workforce.
- Our outreach work is building relationships and breaking down barriers to joining policing but also helping to influence and develop our culture through constructive challenge and engagement.
- We have an active programme of engagement and strong communication and consultation channels with our staff associations and staff networks.

**Earlier assessments**

Mitigated risk score Q4 2021/22

15

Mitigated risk score Q1 2022/23

15

Mitigated risk score Q2 2022/23

15



## Corporate Risk - audit trail of risk management

## Date of update

01/12/2022

## PMO notes

The Risk Management Advisory Group reviewed this risk on 22nd November 2022.

The position for Quarter 3 2022/23 remains unchanged, with the unmitigated risk value of **20** and the mitigated (residual risk) value of **15** remaining unchanged from Quarter 2. There are several reasons behind the decision retain the risk value such as the current high level of vacancies that the organisations are carrying, challenges in the recruitment market and our police officer Uplift programme have not fully completed yet (due by March 2023).

The Constabulary Management Board continues to govern progress on the 6 'steppingstone' work strands (Leadership, Growing Pains, Culture, Rebuilding the CID capability, Uplift and Creating Capacity, which will support the delivery of our ambitions over the next 18 months.

Finally, to address an action (minute 22) set in October 2022 Joint Audit Committee, our Professional Standards Department have provided some narrative on the data behind increased police misconduct cases. (This information has also been reported to the OPCC's Governance and Scrutiny Board). Overall, the total volume of complaints remains high with September, October and November 2022 are higher than average. The last period resulting in high numbers of complaints was after the conviction of Wayne Couzens on the 30th Sept 21, likely to be linked to trust and confidence in the police service being undermined. PSD have provided complaint data to our Performance and Insight team to ascertain if there are any themes to inform organisational learning and to help reduce referrals.

05/10/2022

The risk was reviewed by the Risk Management Advisory Group on 5th October 2022.

The Director of People was unfortunately unable to attend the meeting, therefore the remaining members reflected on the current mitigation activity and concluded that the risk score will remain unchanged at **15**.

12/07/2022

This risk was reviewed by the Chief Officer for People and Organisational Development on 8th July 2022.

There is no change to the mitigated risk value, which remains as **15**. While there are variations in the nature of how the risk is playing out, it is a broad and multifaceted risk and overall given the mitigations in place, I do not think on balance that it is any more likely to materialize at the at the present time than since it was last reported.

16/02/2022

This risk was reviewed at the Risk Management Advisory Group on 15th February by members of Chief Officer Group. The content the risk record was agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is **20**, and based on the internal controls and mitigating activities, we assess the mitigated score to be **15**.

Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 28th June 2022.





## Corporate Risk 5: Information Governance, Data and Digital

December 2022

### Corporate Risk - overview information

<b>Corporate Risk URN</b>	PR000739	<b>Current Mitigated Score</b>	16
<b>Corporate Risk Title</b>	<b>Information Governance practices, data and digital assets are not governed and controlled or used legitimately, ethically, appropriately or effectively for policing purposes</b>	<b>Mitigated Impact Score</b>	4
<b>Corporate Risk Owner(s)</b>	Sarah Crew, Nikki Watson, Nick Adams, Dan Wood, Jon Reilly, Will White	<b>Mitigated Likelihood Score</b>	4
		<b>Date of Risk Review</b>	28/02/2023

<b>Corporate Risk Description</b>	<p>Data is a critical asset for the constabulary and significant investment has been made to facilitate operational use of data. Effective and innovative use of data will be critical for the force to deliver it's vision of outstanding policing for everyone, and show sustained improvement against the four priorities in the Police and Crime Plan 2021-25. In order to fully realise the ambition to be a data-driven organisation, officers and staff need easily accessible, trusted data and analytics with clear purpose to help make evidence-based decisions to drive internal and public-focused outcomes.</p> <p>The recent Data Strategy and Roadmap for change, co-developed with an external partner, outlined the recommended steps for the force to continue on this trajectory of pushing boundaries and innovating with data. However, the Strategy also recognised the increasing demand on Information Governance and Data Ethics, and related functions, to ensure innovation is secure, ethical and compliant.</p>
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### Corporate Risk initial assessment - unmitigated risk

<b>Unmitigated Assessment</b>	20
<b>Unmitigated Impact Score</b>	5
<b>Unmitigated Likelihood Score</b>	4

**Rationale**

There is a complex data architecture with a lack of interoperability between systems and data. We hold data in multiple systems and across personal files and hard drives, which compromise the ability to build a single view of the data to inform making, planning and activity.

MOPI and CPIA compliance are a key focus for the constabulary and we recognised that both statutory/legislative compliance and Crime Data Integrity require improvement.

Data literacy is improving, however it should remain a focus in order to keep pace with the organisational appetite to be more data driven.

There has been strong investment in future technologies such as advanced analytics, robotics and automation. However, the aforementioned foundational issues may pose challenges to the success of innovative techniques.

Our commercial partner (Agilysis) has supported the development of the Data Strategy Roadmap relating to Information Governance (IG) and carried out a further review of our Information Governance and Data Ethics. It was identified within these reviews that the Constabulary does not have a fit for purpose IG function to support not only its strategic ambitions through the use of its data but also to ensure the organisation, as a whole, is compliant and has the appropriate assurance mechanisms in place.

**Corporate Risk latest assessment - mitigated risk**

<b>Mitigated Assessment</b>	<b>16</b>
<b>Mitigated Impact Score</b>	4
<b>Mitigated Likelihood Score</b>	4

## Rationale

The Data Strategy and Roadmap was presented to our Strategic Planning Meeting (SPM) in January 2022, having been developed following extensive engagement with key stakeholders and a commercial partner (Agilysis). The aim of the Data Strategy is "to understand and safely unlock the power of data across the Constabulary and our partners to best support outstanding policing, whilst building staff, partner and public trust and confidence in its use". There are four key investment areas identified in the strategy and roadmap, those are:

- Modern data platform
- Data entry solution
- Data quality and review retention and deletion solution
- Information governance and data governance demand and capacity review.

While the data strategy and roadmap represent a step in the right direction, we are yet to agree how we will deliver on the direction set in these documents and consequently we cannot at this stage rely on these to reduce the risk.

During the Quarter 2 2022/23, a business case has been finalised and presented to the Management Board which responds to the recommendations made in the Data Strategy Roadmap relating to Information Governance (IG) and the subsequent recommendations from the Information Governance and Data Ethics review carried out by external Consultants Agilysis. It was identified within these reviews that the Constabulary does not have a fit for purpose IG function to support not only its strategic ambitions through the use of its data but also to ensure the organisation, as a whole, is compliant and has the appropriate assurance mechanisms in place. The Constabulary has followed the first Agilysis recommendation and set its risk appetite position in relation to data as Open/Cautious and that it is willing to tolerate low risk decisions being taken by activity owners This is in small part, one of the investment interventions, which will be supporting the delivery of the Data Strategy/Roadmap. The business case was approved, and we now progress to delivery of the new ways of working and operating structure in this area, which will take 9 to 12 months to embed and start realising the benefits.

We continue to invest in areas where we can create capacity to enable us to be as efficient as we can be with technology enabling agile ways of working and exploiting opportunities to automate processes. We have implemented 38 automated processes, covering areas including procure to pay, crime recording, vetting, victim care, data quality, intel, and the IT Service Desk. This has resulted in over 2.6 million processed cases, freeing staff from mandatory tasks and enabling them to focus on frontline duties. This is estimated to have gained £4m in efficiencies.

## Earlier assessments

Mitigated risk score Q4 2021/22

20

Mitigated risk score Q1 2022/23

16

Mitigated risk score Q2 2022/23

16

Mitigated risk score Q3 2022/23

16

## Corporate Risk - audit trail of risk management

Date of update	PMO notes
29/11/2022	<p>The Risk Management Advisory Group reviewed this risk on 22nd November 2022. As referred to in the previous update from October 2022, there is a longer-term element to implementing the effective mitigation to this risk. The Constabulary has been carrying vacancies in critical management functions across the Information Governance area for some time and is currently recruiting for these posts.</p> <p>There is very little by way of updates and progress, given the short 6-week gap between reporting.</p> <p>The position for Quarter 3 2022/23 remains unchanged, with the unmitigated risk value of <b>20</b> and the mitigated (residual risk) value of <b>16</b> remaining unchanged from Quarter 2.</p>
05/10/2022	<p>The risk was reviewed by the Risk Management Advisory Group on 5th October 2022.</p> <p>After discussion by the advisory group, the mitigated risk score will be retained at a score of <b>16</b>. We recognise that the investment decision to support the Information Governance business case is a critical enabler to mitigating this risk successfully. Our expectation is that once this new model of operations becomes embedded into the fabric of the organisation, the risk exposure should begin to reduce. However, we acknowledge that this will take significant time to yield results, given the recruitment challenges and scope of change to be delivered across the information governance team.</p>
28/06/2022	<p>The risk was reviewed by the Risk Management Advisory Group on 28th June 2022.</p> <p>We discussed the risk mitigation score and reflected that while we have yet to make investment decisions on the interventions required to enable the Data Strategy delivery, we continue to undertake other activity which is mitigating the risk materialising. Our commercial partners have continued to support us on the journey, delivering critical work to understand requirements around Information Governance and Data Ethics, which will form the building blocks of the proposed future state outlined in the Data Strategy.</p> <p>Additionally, we have seen the innovation such as Robotic Process Automation (RPA) yield significant gains in the management of our live and legacy data sets. The continual reduction in overall data quality errors is encouraging and shows the signs of cultural understanding on the importance of data being understood.</p> <p>The investment needed will ultimately be the intervention that moves the needle and enables us to greatly reduce the risk, but as we plan and consider what our next step might be, we recognise there are some positive outcomes to reflect upon. With this in mind, the risk has been reviewed and the unmitigated risk assessment remains <b>20</b>, while the mitigated risk assessment has reduced to <b>16</b>.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 14th September 2022.</p>
16/02/2022	<p>This risk was reviewed at the Risk Management Advisory Group on 15th February by members of Chief Officer Group. The content the risk record was agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>20</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>20</b>.</p> <p>We recognise the inherent risk, however, as yet no decisions have been made on the investment needed and business cases are being developed to scope the level of investment options available to us. As reflected in the mitigating assessment, as we develop our delivery plans more clearly we would expect this risk to begin to reduce.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 28th June 2022.</p>



## Corporate Risk 6: Infrastructure and Assets

December 2022

### Corporate Risk - overview information

<b>Corporate Risk URN</b>	PR000738	<b>Current Mitigated Score</b>	12
<b>Corporate Risk Title</b>	<b>Failure to maintain, invest in or optimise our infrastructure and assets</b>	<b>Mitigated Impact Score</b>	3
<b>Corporate Risk Owner(s)</b>	Sarah Crew, Nikki Watson, Nick Adams, Dan Wood, Jon Reilly, Will White	<b>Mitigated Likelihood Score</b>	4
		<b>Date of Risk Review</b>	28/02/2023

<b>Corporate Risk Description</b>	<p>Our infrastructure should help us to be at the forefront of best practice, and enable the organisation to be modern, innovative and future-proof. We must ensure that our infrastructure, assets and services are developed sustainably, in a way that is mindful of our financial, political, social and environmental landscape and, in a way that offers value for money.</p> <p>For the clarity, this risk focuses on infrastructure, which includes our physical assets (buildings, fleet) and facilities, as well as the specialist services that provide and maintain those assets. It also encompasses a range of professional services that support our operational directorates. We recognise the IT infrastructure is also a critical enabler of our success and the risks associated with IT infrastructure are reflected on Corporate Risk 5 - Digital and Data.</p>
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### Corporate Risk initial assessment - unmitigated risk

<b>Unmitigated Assessment</b>	15
<b>Unmitigated Impact Score</b>	3
<b>Unmitigated Likelihood Score</b>	5

**Rationale**

Officers, staff and volunteers need to be able to count on having the working environment, tools, equipment and information available to them do their jobs effectively. We must ensure that our estate is maintained to support delivery of services and that the public have access to us when needed. In the post pandemic world and move to blended working arrangements for our workforce, the estate requirements will need to be reviewed to ensure they support the model of working. Our estate also requires managing to ensure it is optimised and that maximum value is being utilised from each asset. The energy consumption and carbon footprint of our estate requires careful management and investment in electric charging infrastructure for electric vehicles, which form part of the fleet of the future. We also need to take into consideration our corporate social responsibility for sustainable practices.

Our estate management plan requires a refresh having not been updated since the change of Police and Crime Commissioner.

Geopolitical issues are affecting the marketplace and supply chains causing challenges for us in areas such as fleet replacement and asset upgrades (laptops, mobile phones).

**Corporate Risk latest assessment - mitigated risk**

**Mitigated Assessment**

12

**Mitigated Impact Score**

3

**Mitigated Likelihood Score**

4

**Rationale**

The Constabulary approved its third Sustainability Plan at Constabulary Management Board (CMB) in December 2021. The plan established new, stretching targets for the organisation by 2026/7, within a framework of broader Sustainability objectives aligned to four over-arching themes:

1. Climate Action
2. Responsible Consumption
3. Sustainable Communities
4. Partnerships – internal and external to deliver change

The annual Sustainability Report was presented to Constabulary Management Board in June 2022, with performance updates, headline risks and next steps against each of the four over-arching themes noted above. The report brings into sharp focus where we need to do significantly more to decarbonise heat in our buildings, understand and reduce the carbon footprint of our supply chain and design sustainability in to new or substantially refurbished buildings from the start. We are applying this learning into our existing and planned built infrastructure projects, as well as implementing a new Regional Sustainable Procurement policy will help to drive sustainability benefits from our supply chain.

The estates management plan is currently (time of writing October 2022) being rewritten and will inform discussions with the Police and Crime Commissioners team to prioritise investment in our estate, in the form of large capital expenditure projects or smaller investments.

In order to mitigate against not having adequate fleet provisions, we have taken the decision to procure vehicles outside of the National Procurement arrangements to ensure our RPU fleet remains sustainable.

Further activity is planned through our leadership forums to support our leaders understand and promote cultural behaviours and standards around the upkeep and maintenance of our assets.

**Earlier assessments**

Mitigated risk score Q4 2021/22
Mitigated risk score Q1 2022/23
Mitigated risk score Q2 2022/23
Mitigated risk score Q3 2022/23

10
10
12
12

**Corporate Risk - audit trail of risk management**

Date of update
29/11/2022
29/09/2022
28/06/2022
23/02/2022

PMO notes
<p>The Risk Management Advisory Group reviewed this risk on 22nd November 2022.</p> <p>The mitigated score of this risk was increased to its current level in October 2022, linked to the geopolitical and financial challenges which underpinned the decision to increase Corporate Risk 2 at the same time. Given the short period of time between that decision in October and this review, there has not been any significant change in the positioning of this risk. Therefore, the position for Quarter 3 2022/23 remains unchanged, with the unmitigated risk value of <b>15</b> and the mitigated (residual risk) value of <b>12</b> remaining unchanged from Quarter 2.</p>
<p>The risk was reviewed by the Risk Management Advisory Group on 5th October 2022.</p> <p>Reflecting on the continuing geopolitical and economic backdrop, and the current mitigation activity for this risk the decision was made to increase the mitigated risk score from <b>10</b> to <b>12</b>.</p>
<p>The risk was reviewed by the Risk Management Advisory Group on 28th June 2022.</p> <p>Following the review of our associated organisational risks in this area and considering our strategic position currently, the group made the decision that the risk would remain <b>unchanged</b> at a mitigated level of <b>10</b>. There are several areas where we continue learn and develop our understanding of what is required as an organisation to achieve the goals we have set ourselves in our strategy, will our annual sustainability report in June 2022 providing opportunity for reflection on our currently trajectory to achieving our objectives.</p> <p>The Leapwise governance review, see Corporate Risk 1, has recommended some addition control and assurance needed for Corporate Change activity and these will help support and strengthen our estate and asset management governance in the future.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 14th September 2022.</p>
<p>This risk was reviewed at the Risk Management Advisory Group on 15th February by members of Chief Officer Group. The content the risk record was agreed and an assessment of the risk score was made. As reported above, our unmitigated assessment of this risk is <b>15</b>, and based on the internal controls and mitigating activities, we assess the mitigated score to be <b>10</b>.</p> <p>Our rationale for the risk being reduced is we recently refreshed court infrastructure strategy, and the sustainability plan within it. We have also strengthened our governance of our delivery by establishing to boards that sit under the Finance and Asset Committee, these being Fleet Asset Management Board and Estate Asset Management Board, which led by senior leaders are overseeing service delivery and change projects.</p> <p>Our next review of this risk is scheduled for the next meeting of the Risk Management Advisory Group on 28th June 2022.</p>





Report 9a

# Avon & Somerset Constabulary and Office of the Police and Crime Commissioner Joint Audit Committee (JAC)

Report of Internal Audit Activity- December 2022



## Executive Summary

SWAP is required to provide an annual opinion to support the Annual Governance Statement.

As part of our plan progress reports, we will look to provide an ongoing opinion to support the end of year annual opinion.

We will also provide details of any significant risks that we have identified in our work. A reminder of our assurance opinions and risk assessment is on our [website](#).

The Chief Executive for SWAP reports company performance on a regular basis to the SWAP Directors and Owners Boards.



### Audit Opinion and Summary of Significant Risks

#### **Progress of the 2022/23 Internal Audit Plan**

Work is underway to complete the 2022/23 audit plan and copies of the following reports which have been finalised since the last Committee in September 2022 are submitted with this update:

- Policy and Procedure Management;
- Risk Management Follow Up; and
- Complaints Handling Follow Up.

Scopes for both the Detective Numbers and Assurance Mapping audits scheduled to commence in quarter four have been agreed. Further detail is provided on the stage of each audit in Appendix A and progress is summarised in the table below:

Performance Measure	Performance
<b><u>Delivery of Annual Audit Plan</u></b>	
Completed	67%
In Progress	8%
Ready to Start	17%
Scoping	0%
Not Started	8%

#### **Audit Opinion:**

We are able to provide a **Reasonable** assurance opinion based on work completed to date.

#### **Significant Risks:**

We have not identified any significant risks in our work since the previous update to this Committee.

#### **Follow Ups:**

To date, two (of three) follow up audits have been completed. The final follow up of Clinical Governance within Custody is planned for completion in quarter four.

### **Regional Audit Work**

Our regional work will commence in December 2022. We will endeavour to finalise these by the end of quarter four. However, these timescales will be dependent on engagement from required parties.

### **Contingency**

Five days were set aside for contingency in this year's audit plan. Members have agreed to carry these days forward into the 2023/24 audit plan.

### **Added Value**

We attended the Police Audit Group (PAG) in November 2022 which brings together internal audit providers from across the country. This year, PAG had representation from around 75% of forces nationally. This was a two-day event with speakers from CIPFA, the Institute of Internal Audit (IIA), Grant Thornton and force speakers from across the UK. Innovation and change were discussed as aspirations for all providers including the development of a One Page Report, agile auditing, and use of data analytics which SWAP could demonstrate advancement and maturity in. The content and discussions from PAG will be taken into consideration when planning for 2023/24.

SWAP's Counter Fraud Team has delivered mandate fraud awareness training to the Force's Finance and Payroll team (c.60 in attendance). The session was recorded and will be shared with anyone who did not attend. This training has been offered to all our police partners at no additional cost.

# Internal Audit Plan Progress 2022/23

# Appendix A

Link(s) to Corporate Risk Register	Audit Area	Period	Audit Days	Status	Opinion	No of Recs	1 = Major	↔	3 = Minor
							Recommendations		
							1	2	3
Risk 4 - People_ Growing, developing and then maintaining the workforce and leadership culture, capacity and capability we need.	Representative Workforce	Q1	15	Completed	Reasonable	3		0	3
Risk 3_ Service Delivery_ Failure to meet expectations of improved performance and service delivery. Risk 6 – Infrastructure and Assets _ Maintaining, investing in and optimising our infrastructure and assets.	IT Service Desk	Q1	15	Completed	Limited	8		4	4
Risk 3_ Service Delivery_ Failure to meet expectations of improved performance and service delivery.	Management of Evidential Property	Q1	15	Completed	Limited	6		4	2
Risk 2 - Finance - Ability to deliver a sustainably balanced budget.	Key Financial Controls	Q2	18	Completed	Reasonable	5		1	4
Risk 3_ Service Delivery_ Failure to meet expectations of improved performance and service delivery	Firearms Licencing	Q2	15	Completed	Reasonable	3		2	1
Risk 4 - People_ Growing, developing and then maintaining the workforce and leadership culture, capacity and capability we need.	Reasonable Adjustments	Q2	15	Completed	Limited	2		1	1
Risk 1 - Governance - The application of effective and well-understood governance arrangements and internal controls.	Policy and Procedure Management	Q3	13	Completed	Reasonable	7		3	4

Link(s) to Corporate Risk Register	Audit Area	Period	Audit Days	Status	Opinion	No of Recs	1 = Major	↔	3 = Minor
							Recommendations		
							1	2	3
Risk 1 - Governance_ The application of effective and well-understood governance arrangements and internal controls.	Risk Management Follow Up	Q3	7	Completed	Reasonable	0		-	-
Risk 3_ Service Delivery_ Failure to meet expectations of improved performance and service delivery Risk 4_ People_ Growing, developing and then maintaining the workforce and leadership culture, capacity and capability we need.	Detective Numbers	Q4	15	Ready to Start	-	-	-	-	-
Risk 1 - Governance - The application of effective and well-understood governance arrangements and internal controls.	Assurance Mapping	Q4	12	Ready to Start	-	-	-	-	-
Risk 1 - Governance - The application of effective and well-understood governance arrangements and internal controls.	Follow Up (2/3 Completed)	Q1-4	5	In Progress	N/A – Follow Up Work	-	-	-	-
Collaborations	Contribution to Regional Police Audits	Q4	10	Not Started	-	-	-	-	-
N/A	Carry Forward into 2023/24		5	N/A	-	-	-	-	-

**Audit Objective**

To provide assurance over the effectiveness of the Force and OPCC's management of local policies and procedures.

Report 9b

**Link to CRR**

CRR 1: The application of effective and well-understood governance arrangements and internal controls.

Assurance Opinion	Number of Actions		Audit Assessment of Agreed Themes	
	Priority	Number	Theme	
	Priority 1	0	Leadership & Culture	
	Priority 2	3	Learning	
	Priority 3	4	Diversity & Inclusion	
	<b>Total</b>	<b>7</b>	<i>Please see Appendix 1 for more details.</i>	

Risk Reviewed	Assessment
Inadequate management of policies and procedures could lead to inefficient operation of day-to-day processes, non-compliance with laws and regulations and poor decision making which may result in financial loss, reputational damage and/or a loss of confidence in policing.	Medium
<b>Risk Management Awareness</b>	<b>Satisfactory</b>

**Key Findings**

- At the time of writing, 20% (47) of the Force's policies and procedures (hereafter referred to collectively as 'policies') are out of date and 7% (15) are awaiting approval. Some of which have been out for date for more than 3yrs. The Force's Portfolio Management Officer (PMO) is responsible for flagging policies due to expire and where necessary, chasing policy owners to update them. This was found to be occurring for all outdated policies sampled in our review. Delays in updating policies were either found to be a result of capacity issues within HR or Legal Services or where the Force was waiting on information from external organisations such as the Home Office. Further work is also required for the Force to ensure Equality Impact Assessments (EIA) are completed and retained where appropriate and for the PMO to draft additional guidance for policy owners.
- Pocketbook is used to store the Force's policies. Pocketbook traffic data was reviewed for a sample of policies. Traffic over the last 12mths implied that officers and staff may not be reading these. Further work may therefore be required to ensure individuals read policies and traffic is monitored on a regular basis for key policies that the Force expects all officers and members of staff to read.
- The OPCC is currently in the process of reviewing all their policies (around 40 in total). Some of these policies have been out of date since 2012. Due to a lack of resource to review these internally, they have instructed legal firm Burge Salmon to update them on their behalf. All policies should be approved by early 2023. Going forward, the OPCC plan on recruiting a HR Support Officer who will be responsible for maintaining policies. They should be in post by November / December 2022. Several actions have been raised to improve the controls related to the management of policies at the OPCC and to ensure reviews do not lapse.

**Audit Scope**

- We considered the following areas as part of the audit:
- The overarching record of policies and procedures in place.
  - Whether policies and procedures are in line with agreed templates / formats.
  - The accessibility of policies and procedures including from an inclusivity perspective.
  - Mechanisms for flagging review and any prioritisation system/risk assessment in place.
  - How the Force and OPCC records compliance and review by officers and staff.
  - Horizon scanning processes for required updates.
  - Governance and approval mechanisms for policies and procedures.

**Conclusion**

Generally, the framework of controls to manage the Force's 230 policies and procedures were found to be operating effectively. The PMO uses Verto (a work management solution) to assist them in this task. Verto holds a variety of information related to each policy which is regularly updated by the PMO. Management information can be extracted from Verto easily and is used by the PMO to flag policies coming up for review (usually 4 months in advance of the review date). The PMO will keep an audit log of all correspondents related to a policy within Verto and attachments are stored within a dedicated email inbox. Whilst the controls to help manage policies and procedures at the Force were found to be working well generally, our audit opinion has been impacted by the work at the OPCC. It is our view that the OPCC may benefit from reviewing the areas of good practice identified at the Force and implementing a similar approach to manage their own policies. Actions have been raised for both organisations to strengthen their controls which have been detailed at Appendix 1 below.



Appendix 1

Findings & Action Plan

<b>1. Force</b>													
<p><b>1.1 Finding: - Read and understand policies and procedures.</b></p> <p>Police officers and staff are made aware of policies and procedures (collectively referred to hereafter as ‘policies’) as part of their induction and are required under the conditions of their contract of employment to read these. However, employees are not required to confirm that they have read and understood the policies relevant to their role. It is the responsibility of their line managers to ensure this is done. All policies are stored on Pocketbook and although not routinely done, traffic to Pocketbook pages where policies are held can be monitored.</p> <p>A sample of 10 random policies were selected and Pocketbook traffic data for each was provided. Over a period of 12 months, 1.1k visits on average to Pocketbook pages were made across all 10 policies reviewed. Given that the Force employs over 5,000 people, average traffic is low and therefore, we can conclude that all employees are not reading policies. This conclusion is further supported when reviewing the statistics for weekly newsletters which are used to communicate new policies or changes / revisions. Newsletters contain hyperlinks to new or updated policies which are auditable. Newsletters covering a period of six months were reviewed. Seven policies were communicated via these newsletters over that period, and we found that no more than 20 employees had clicked on the hyperlink.</p> <p>The Force should implement a mechanism where data for key / essential policies required to be read by all officers and staff (e.g., Codes of Conduct, Whistleblowing etc.) is reported on regularly and scrutinised. This should provide some assurance that policies are being read by employees.</p>	<p><b>1.1a Recommendation</b></p> <p>The Delivery Manager – Portfolio and Portfolio Management Officer in liaison with senior management, agrees a suite of key policies and procedures which must be read by all officers and staff irrespective of their role. Data should be reported in relation to this to provide assurance that these are being read by employees. The information should be reported to an appropriate governance board for scrutiny.</p> <p><b>Agreed Action</b></p> <p>The PMO will identify with the new Head of HR Operations (and with support from PSD) those core procedures that must be read by all Officers and Staff. This activity will be completed via a Task &amp; Finish exercise. These procedures should all be sign-posted via updated induction materials. Currently, we can capture data traffic in relation to procedures accessed from Pocketbook. This is further to sign-posting of procedures via the weekly Need to Know Bulletin. However, this management information is relatively basic as it just advises “page clicks”. We will explore the potential of new functionality from M365 where mandatory read options could be available (via a replacement intranet system). The recommendation is accepted noting we are unable to provide a firm date at this time for the completion of the second part of the proposed solution described above.</p> <table border="1"> <tr> <td><b>Priority</b></td> <td style="background-color: #FFD700;">2</td> <td><b>SWAP Ref.</b></td> <td>47798</td> </tr> <tr> <td><b>Responsible Officer</b></td> <td colspan="3">Delivery Manager – Portfolio and Portfolio Management Officer</td> </tr> <tr> <td><b>Timescale</b></td> <td colspan="3">31/03/2023</td> </tr> </table>	<b>Priority</b>	2	<b>SWAP Ref.</b>	47798	<b>Responsible Officer</b>	Delivery Manager – Portfolio and Portfolio Management Officer			<b>Timescale</b>	31/03/2023		
<b>Priority</b>	2	<b>SWAP Ref.</b>	47798										
<b>Responsible Officer</b>	Delivery Manager – Portfolio and Portfolio Management Officer												
<b>Timescale</b>	31/03/2023												
<p><b>1.2 Finding: - Equality Impact Assessments.</b></p> <p>There are around 90 policies which require an Equality Impact Assessment (EIA). These should be shared with the Portfolio Management Officer (PMO) where appropriate. In 21 cases however, we found that an EIA had not been shared with the PMO despite one being stated as completed by the policy owner.</p>	<p><b>1.2a Recommendation</b></p> <p>The Portfolio Management Officer to obtain and retain copies off all Equality Impact Assessment completed where appropriate.</p> <p><b>Agreed Action</b></p> <p>Activity is already underway. To date, 21 Procedures have been identified, and all authors have been contacted to request the EIA. This recommendation is accepted.</p> <table border="1"> <tr> <td><b>Priority</b></td> <td style="background-color: #000080; color: white;">3</td> <td><b>SWAP Ref.</b></td> <td>47796</td> </tr> <tr> <td><b>Responsible Officer</b></td> <td colspan="3">Delivery Manager – Portfolio and Portfolio Management Officer</td> </tr> <tr> <td><b>Timescale</b></td> <td colspan="3">31/12/2022</td> </tr> </table>	<b>Priority</b>	3	<b>SWAP Ref.</b>	47796	<b>Responsible Officer</b>	Delivery Manager – Portfolio and Portfolio Management Officer			<b>Timescale</b>	31/12/2022		
<b>Priority</b>	3	<b>SWAP Ref.</b>	47796										
<b>Responsible Officer</b>	Delivery Manager – Portfolio and Portfolio Management Officer												
<b>Timescale</b>	31/12/2022												



<p><b>1.3 Finding: - Policy template.</b></p> <p>The Force has an agreed policy template to help ensure consistency. A random sample of 10 policies were reviewed against the template and found to be broadly in line with it. There were however some instances where certain sections were omitted or merged with another. The template outlines key headers to be included within a policy but contains no information on what should be covered within these headers / sections. An action has therefore been raised to include guidance for Policy Owners when completing each of the sections.</p>	<p><b>1.3a Recommendation</b></p> <p>The Portfolio Management Officer to include section specific guidance for Policy Owners within the Policy Template.</p> <p><b>Agreed Action</b></p> <p>Activity is already underway. This recommendation is accepted.</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 25%;"><b>Priority</b></td> <td style="width: 25%; text-align: center;"><b>3</b></td> <td style="width: 25%;"><b>SWAP Ref.</b></td> <td style="width: 25%; text-align: center;">47794</td> </tr> <tr> <td colspan="2"><b>Responsible Officer</b></td> <td colspan="2" style="text-align: center;">Delivery Manager – Portfolio and Portfolio Management Officer</td> </tr> <tr> <td colspan="2"><b>Timescale</b></td> <td colspan="2" style="text-align: center;">31/12/2022</td> </tr> </table>	<b>Priority</b>	<b>3</b>	<b>SWAP Ref.</b>	47794	<b>Responsible Officer</b>		Delivery Manager – Portfolio and Portfolio Management Officer		<b>Timescale</b>		31/12/2022	
<b>Priority</b>	<b>3</b>	<b>SWAP Ref.</b>	47794										
<b>Responsible Officer</b>		Delivery Manager – Portfolio and Portfolio Management Officer											
<b>Timescale</b>		31/12/2022											

<p><b>1.4 Finding: - Out of date policies and procedures.</b></p> <p>The Force has over 230 policies. At the time of writing, 20% (47) were out of date and 7% are awaiting approval. Around 46 of these have been out of date for over 12 months. We reviewed a c.10% sample of outdated policies to ensure these delays could be explained. In most cases, the policy was awaiting HR and/or legal approval. We were informed by the PMO that these departments lacked resource to review and approve policies. In addition, some policies could not be revised as the Force was waiting for further information from external organisations such as the Home Office. In all cases sampled, we found evidence to support that the policy was regularly being chased by the PMO and Pocketbook had been updated to include a statement for readers highlighting that the policy was out of date and to contact the owner if necessary. We are therefore satisfied that policies are being flagged for review on time by the PMO and those that are out of date cannot be controlled by the PMO and in some instances, where information is required from external organisations, the Force. Therefore, no action will be raised. The findings have been included for management consideration only.</p>
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<p><b>1.5 Finding: - The PMO’s email retention periods.</b></p> <p>The Force uses Verto (a work management solution) to manage and monitor its policies. Verto holds key information on each policy which is reportable. This information is used to assist the PMO in flagging policies coming up for review (usually four months before a policy’s review date). It is not a tool to store actual files (e.g., documents, emails etc.). As such, evidence to support, for example, the PMO chasing a Policy Owner to update a policy is held elsewhere. One of these locations is the PMO’s dedicated ASP Procedure email inbox. As per the Force’s retention schedule, all emails are deleted after a year. The PMO has established a partial work around by capturing key information in the form of a written log on Verto which acts as an audit trail / record for each policy. Our testing was therefore reliant in part on the confirmation held on Verto as the source information had been deleted. Where possible, the Force should consider extending the PMO’s retention period on its email inbox. However, given that all email inboxes are subject to the same retention schedule across the Force to ensure a consistent approach, no formal actions will be raised. The findings have been noted for consideration.</p>
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**2. OPCC**

<p><b>2.1 Finding: - Out of date policies and procedures at the OPCC.</b></p> <p>The OPCC has around 40 policies in total which are all currently being reviewed and updated. Some policies have been out of date since 2012 due to limited capacity and resource to be able to update these. Following an internal recommendation to the PCC in summer 2022, legal firm Burges Salmon were instructed to review and update all the OPCC’s policies. All policies and procedures are due to be updated, approved and published early in the new year (2023). We have been informed by the Head of HR and Business Support that Burge Salmon has not raised any concerns about the legality of the policies that are currently out of date. Going forward, the OPCC are recruiting a HR Support Officer whose role will including maintaining these policies. They are</p>	<p><b>2.1a Recommendation</b></p> <p>The Head of HR and Business Support (HR&amp;BS) and HR Support Officer (HRSO) (once in post) to consult with the PMO in order to review their processes and implement a similar policy management framework to ensure OPCC policies are reviewed on a timely basis.</p> <p><b>Agreed Action</b></p> <p>Head of HR&amp;BS and HRSO to meet with the PMO to understand the Verto system and how the OPCC might use this to support a management framework for reviewing the OPCC HR policies. Framework to be in place by Feb 23.</p>
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likely to be in post November / December 2022. To ensure policies and procedures do not lapse following Burges Salmon's work, it is our view that the OPCC may benefit from implementing a similar policy management framework as the Force and an action has been raised accordingly.

<b>Priority</b>	2	<b>SWAP Ref.</b>	47793
<b>Responsible Officer</b>	Head of HR and Business Support		
<b>Timescale</b>	28/02/2023		

**2.2 Finding: - Read and understand policies and procedures.**

The OPCC's policies are accessible to staff on a shared drive. Staff are required to read these as part of their induction process. However, there are no mechanisms in place to ensure that they do. Given that the OPCC is a relatively smaller organisation in comparison to the Force, the OPCC should request that all staff confirm that they have read and understood their policies and procedures and a record kept on their personnel files confirming this.

**2.2a Recommendation**

The Head of HR and Business Support to ensure all existing and new members of staff sign a declaration confirming that they have read and understood the OPCC's policies and procedures. These declarations should be held within the personnel files of staff.

**Agreed Action**

Head of HR&BS will make this part of the OPCC induction pack. If new policies are implemented staff to declare that they have read and understood. Also, if training is provided to support a particular policy again staff to sign that they have received training. Records to be kept on personnel files. Business Support Officer to implement.

<b>Priority</b>	2	<b>SWAP Ref.</b>	47799
<b>Responsible Officer</b>	Head of HR and Business Support		
<b>Timescale</b>	31/12/2022		

**2.3 Finding: The completion and retention of Equality Impact Assessments.**

Equality Impact Assessments (EIA) are planned to be added to OPCC policies and procedures once approved. This will likely be the role of the HR Support Officer once in post. Given the importance of these, an action has been raised to ensure these are completed and retained where necessary.

**2.3a Recommendation**

The Head of HR and Business Support to ensure Equality Impact Assessments are completed and retained for policies and procedures requiring them.

**Agreed Action**

Waiting on HRSO to start to provide capacity to undertake this piece of work.

<b>Priority</b>	3	<b>SWAP Ref.</b>	47797
<b>Responsible Officer</b>	Head of HR and Business Support		
<b>Timescale</b>	28/02/2023		

**2.4 Finding: - Agreed template for policies and procedures.**

The OPCC does not currently have an agreed template for their policies. One should be agreed as soon as possible to ensure consistency and all policies and procedures currently being reviewed should follow the format agreed.

**2.4a Recommendation**

The Head of HR and Business Support to draft and agree a template for the OPCC which should be followed for all policies and procedures.

**Agreed Action**

Most OPCC policies are in a standard format. Business Support Officer to develop a template for any new policies and put any non-compliant policies into the template format.

<b>Priority</b>	3	<b>SWAP Ref.</b>	47795
<b>Responsible Officer</b>	Head of HR and Business Support		
<b>Timescale</b>	31/01/2023		





Audit Assessment of Agreed Themes		
Theme	RAG Rating	Rationale
Leadership & Culture	Amber	The rating that we have been able to provide over this area has been impacted by our findings at 1.1 which suggests a large proportion of employees may not have read key policies. In addition, the OPCC currently lacks any mechanism to provide assurance that their members of staff are reading policies.
Learning	Amber	Learning opportunities for the OPCC have been identified with regards to their current processes.
Diversity & Inclusion	Amber	Actions in respect to Equality Impact Assessments have been raised for both the OPCC and Force.

Follow Up Audit Objective

An agreed light-touch review to provide an assurance opinion following on from the Risk Management review of 2021/22.

Report 9c

Assurance Opinion	Number of Recommendations		Audit Assessment of Agreed Themes	
	Priority	Number	Theme	
	Priority 1	0	Leadership & Culture	
	Priority 2	0	Learning	
	Priority 3	0	Diversity & Inclusion	
	<b>Total</b>	<b>0</b>	<i>Please see Appendix 1 for more details.</i>	

Risk Reviewed	Assessment
The Force does not adequately identify, evaluate and/or manage risk, resulting in an adverse event occurring which negatively impacts the Forces' ability to achieve strategic objectives.	Low
<b>Risk Management Awareness</b>	<b>Satisfactory</b>

Key Findings

	A planned maturation activity timeline for the implementation of key risk management milestones has been developed and is on schedule to be delivered. Since July 2022, roles and responsibilities for Improvement Consultants (ICs), responsible for updating directorate risk registers, have been defined; a force wide PowerPoint presentation giving basic information with regards to risk management has been published on Pocketbook for all staff; and a Risk Management specific CPD activity is in development, among a range of other updates and improvements. There are still some key areas on the timeline to be implemented which have been discussed in Appendix 1 below.
	The Portfolio Management Office (PMO) is developing their horizon scanning service through the future publishing of a quarterly Horizon Scanning Report. The report will summarise information pulled together from the wider policing environment and will be shared with the Chief Officer Group and pre-agreed cohorts. The first iteration of this report is due for publication in December 2022 and will help further strengthen risk management knowledge and risk identification across the force.
	VERTO, the force's risk management and risk register database, has been developed further since our original audit. ICs now regularly update their directorate's risks in line with reporting deadlines; updates to risks are reviewed by the Governance and Risk Manager (GRM) on a weekly basis. Risk reports are currently downloaded from VERTO and presented at committees. Work to integrate VERTO information into Qlik, the force's data visualisation software, is in the Beta testing phase with the system due to go live from the end of November 2022. The GRM is due to brief Joint Audit Committee members on the new dashboards on 14 <sup>th</sup> December.
	Each of the four recommendations raised in the previous review have now been implemented and are therefore complete. The evidence to support this assessment has been outlined in Appendix 1 below.

Audit Scope

We considered the following areas as part of the audit:
<ul style="list-style-type: none"> <li>The Risk Management Policy/ Strategy and supporting procedures, including risk escalation and transparency.</li> <li>The training, CPD, support, and awareness in place to undertake risk management activities at all levels of the Force.</li> <li>The oversight of organisational risk reports through the governance framework, checking and testing of appropriate escalation and actions taken by governance committees.</li> <li>Processes in place for risk horizon scanning, and risk escalation.</li> <li>A follow up of recommendations agreed in the advisory report issued in March 2022.</li> </ul>

Conclusion

The force has improved their risk maturity and the importance of risk management is starting to embed across many areas of the organisation. This has mainly been achieved through the work the Governance and Risk Manager (GRM) and Portfolio Management Office (PMO) have completed but also through adopting the recommendations raised as part of the previous reviews from SWAP and Leapwise. We are unable to provide a higher assurance opinion as some aspects of risk management are in the pipeline and have yet to be implemented, such as the Horizon Scanning quarterly report, risk management CPD session and the defining of the force's risk appetite. The GRM and PMO have, however, developed an approach to defining risk appetite which has been used to create an Information Governance business case, which has since been approved. Our follow up assessment of the four recommendations raised in the original review is detailed in Appendix 1, below.



## Appendix 1

## Agreed Actions & Follow Up Assessment

1.1a	Recommendation				
<p>We recommend that the Governance &amp; Risk Manager develops a roadmap to include the different risk management milestones they intend to reach and a target date in order to achieve this, to help define the organisation's path in developing their risk management maturity.</p>					
<b>Agreed Action</b>			<b>Follow Up Assessment</b>		<b>Complete</b>
<p>A roadmap of milestones dates for delivery of the risk management framework was presented to the CMB in May 2021. The Governance and Risk Manager accepts the recommendation and recognises the need to refresh the timeline for delivery given that there has been some slippage in meeting these dates, in part due to the volume of work associated with maturing the force approach to risk management.</p>			<p>A planned maturation activity timeline for the implementation of key risk management milestones has been developed and is on schedule to be delivered. This was shared at the Risk Management Advisory Group on 5<sup>th</sup> October 2022.</p> <p>Some of these milestones have already been delivered such as the publication of the roles and responsibilities of the Improvement Consultants, development of a 6-slide PowerPoint presentation aimed at educating all staff with the basics and benefits of risk management, and the risk appetite research activity.</p> <p>More milestones will be completed between now and March 2023, most notably, the Leadership Academy - offering more in-depth Risk Management training, the publication of a Risk Management Policy, and the completion of risk appetite statements to align to the Force Strategy. With regards to risk appetite, a methodology has been developed by the GRM and PMO to create an Information Governance business case which has since been approved.</p> <p>The GRM confirmed that the planned maturation activity timeline is still mostly accurate, but some areas mentioned in the timeline may be completed slightly later than planned. This will not, however, disrupt the direction the force is currently moving in.</p>		
<b>Priority</b>	2	<b>Timescale</b>	30/06/22	<b>SWAP Ref:</b>	46794
1.2a	Recommendation				
<p>We recommend that the Deputy Chief Constable discusses how Chief Officer responsibilities for risk management are best reflected in the role profiles they hold.</p>					
<b>Agreed Action</b>			<b>Follow Up Assessment</b>		<b>Complete</b>
<p>The Constabulary will review the content of role profile descriptions for the identified roles to ensure that risk management responsibilities are appropriately reflected.</p>			<p>The recommendation was discussed with Chief Officer Group (COG) members in April 2022. It was agreed that job descriptions would be amended to clearly reflect the risk management responsibilities of members of the COG, with the request supported by the Deputy Chief Constable.</p> <p>The GRM provided the updated job profile descriptions amended by Human Resources. We can confirm there is now an entry on each COG job profile description which states that one of the main responsibilities is to "Discharge the responsibilities for Risk Management associated with the role as set out in the Risk Management Procedure". We are therefore satisfied that the agreed action has been implemented.</p>		
<b>Priority</b>	2	<b>Timescale</b>	30/06/22	<b>SWAP Ref:</b>	46796



1.2b Recommendation					
We recommend that the Governance & Risk Manager reflects the changes agreed above within the Risk Management procedure so that the responsibilities of Chief Officers are consistent in both documents.					
Agreed Action		Follow Up Assessment			Complete
On completion of recommendation 1.2a, the Governance & Risk Manager will make the required updates to the procedural guidance.		As seen in the follow up assessment above, the job profile descriptions have been amended so that they now reflect the responsibilities of the COG. The GRM has provided an updated version of the Risk Management Procedural Guidance. As can now be seen in the version control table of the document, Version 5, updated on 30 <sup>th</sup> June 2022, states that <i>“in response to internal audit recommendations, section 7 – Roles and Responsibilities has received a minor amendment. The term ‘Head of Internal Audit’ has been removed from the Chief Officer for Finance. An amendment has been made to Appendix D – slightly renaming one risk type”</i> . We are satisfied that the amendments to the roles and responsibilities within the Risk Management Procedural Guidance addresses the recommendation raised in the original review.			
Priority	3	Timescale	30/06/22	SWAP Ref:	46830

1.3a Recommendation					
We recommend that the chairs of the Constabulary Management Board and other Committees, ensure that risks discussed are captured in meeting minutes or via action/decision logs.					
Agreed Action		Follow Up Assessment			Complete
The Constabulary will implement the recommendation, while also considering the findings of the Leapwise review, to ensure make progress in strengthening our governance leadership and internal controls.		<p>Following receipt of the Leapwise report in June 2022, the force has improved their recording of risk discussions, actions and outcomes at the Constabulary Management Board (CMB) and other committees. The Leapwise report recommended that the force should discuss risk as the first agenda item at all committees (other than the CMB). Requested copies of the two latest People Committee, Finance and Assets Committee, and Confidence and Legitimacy Committees were provided for review. We can confirm that all copies provided evidence risk management as an agenda item following recaps of the previous meetings.</p> <p>Additionally, it is now evident that risks are being reported into and being captured at committees with actions being recorded in action logs. This is also evidenced in the March and July 2022 CMB capture sheets.</p> <p>We are satisfied that the recording of risk is starting to improve, and this has been evidenced in the committee capture sheets requested.</p>			
Priority	2	Timescale	30/09/22	SWAP Ref:	46798



Audit Assessment of Agreed Themes		
Theme	RAG Rating	Rationale
Leadership & Culture		Leadership and culture have improved since our original review. Meeting capture sheets from multiple committees has evidenced a greater priority to risk management and a better overall capturing of risks within action logs and recording in committee minutes.
Learning		The RAG rating reflects the learning from previous reviews and recommendations implemented alongside the improvements to risk management and overall governance.
Diversity & Inclusion		Our assessment remains unchanged from the original review. Strategic and directorate risk registers evidence risk regarding workforce planning with a view to ensuring all staff and officer groups are fairly represented.



**Follow Up Audit Objective**

To provide assurance that the agreed actions to mitigate against the risk exposure identified within the 2021/22 Limited opinion audit of Complaints Handling have been implemented.

**Follow Up Progress Summary**

Priority	Complete	In Progress	Not Started	Summary
Priority 1	0	0	0	0
Priority 2	6	0	0	6
Priority 3	0	1	0	1
<b>Total</b>	<b>6</b>	<b>1</b>	<b>0</b>	<b>7</b>

**Follow Up Assessment**

The original audit of Complaints Handling processes was completed in October 2021 and received a Limited assurance opinion. The objective of that audit was to provide assurance over the Force’s and OPCC’s control framework with regards to handling complaints in adherence with the national guidance.

This audit sought to ‘Follow Up’ on the implementation of recommendations made as part of the original audit. Audit testing was performed in relation to the priority 2 recommendations and supporting evidence obtained where possible to demonstrate their implementation.

**Key Findings**



A recommendation was raised in our original audit, for the Force to establish whether a person under investigation is entitled to receive a copy of an Investigation Report, where reflective practice processes are determined as the outcome. The Force has established that the Independent Office for Police Conduct (IOPC) do not share their full reports with involved parties for data protection reasons. Instead, the IOPC completes a short synopsis of their investigation which is shared with the parties involved. The Force are exploring a similar approach for their internal investigations which should be in place by the end of the calendar year.



The Professional Standards Department (PSD) have received training on crucial administration and recording requirements for an investigation. The Head of PSD has sighted the department’s investigators on the learning identified in our original audit. Bi-monthly dip sampling has also been introduced to review the quality of data and case recording within Centurion (the Force’s complaints management system) which is reported via a Qlik dashboard to the department’s senior leaders. The Head of PSD hopes improvements to data quality within Centurion will be seen over the next 12 months.

**Conclusion**

A total of seven recommendations were raised within the original audit. Six of the higher priority recommendations (Priority 2) are complete. One Priority 3 action is currently in progress and is due to be implemented by the end of the calendar year (2022).



Appendix 1

Agreed Actions & Follow Up Assessment

1.1a Recommendation

We recommend that the Head of Professional Standards ensures that the complainant, person under investigation and any interested party is kept informed of the progress of their case. This should include processes to ensure that a Terms of Reference is produced and shared with the complainant and person under investigation to seek their agreements to the scope of the investigation, comments, or concerns. Evidence to support correspondents with the above individuals should be retained centrally.

Agreed Action

We have reviewed the recommendation and recognise some of the issues cross over into each area. These issues can be considered themes and are valuable insight which will be captured on the department’s Single Delivery Plan for onward scrutiny.

Beyond the key themes, the audit has identified multiple administration and recording issues in particular these include updates to Centurion and saving of documents, and some non-regulatory compliance including contact, updates and communication. The department will reflect and embed appropriate changes to improve in these areas recognising the importance for legitimacy.

However, it is also relevant to provide some context which has likely impacted on compliance by PSD. PSD agreed to handle all complaint investigations between March – November 2020 to release front line capacity to respond to policing the public health crisis. Both national and regional PSD meetings indicate ASC was one of only a small number of forces to have allocated all complaints to its PSD to protect front line resources. We have not identified another force that undertook this exceptional position. This was on the backdrop of a change in Regulations and a significant increase in complaints. In only the last 12 months, complaints have increased by over 68%. The additional pressure in PSD has impacted on timeliness, effective supervisor reviews and administrative inconsistencies.

Follow Up Assessment

Complete

The Head of the Professional Standards Department (PSD) has delivered training to PSD reminding them of the importance of completing the Terms of Reference; consulting with all parties involved in an investigation; and data quality and recording within Centurion. Evidence to support this training was requested as part of our follow up review. However, this had not been retained by the Head of PSD and therefore, assurance surrounding the delivery of this training is based on their confirmation only.

Data quality within Centurion is reviewed bi-monthly through dip checks. The findings and any learning from these checks is reported to PSD’s Senior Leadership Team. The Head of PSD hopes that improvements in terms of data quality within Centurion and compliance with investigatory practices will be seen over the next 12 months.

Priority	2	Timescale	31/01/2022	SWAP Ref:	46102
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<b>1.1b Recommendation</b>					
We recommend that the Head of Professional Standards ensures all officers and staff in charge of investigating a complaint, conduct or performance matter ensure:					
<ul style="list-style-type: none"> <li>Cases that are reassessed on review as either requiring an investigation under Sch. 3 of the Police Reform Act (or not) or those that require no further action to be taken are updated on Centurion accordingly.</li> <li>Centurion is updated with any learning identified from an investigation.</li> </ul>					
<b>Agreed Action</b>			<b>Follow Up Assessment</b>		<b>Complete</b>
Agreed to communicate these requirements to all Investigators as part of our monthly CPD training.			The importance of ensuring information within Centurion is accurate has been communicated to investigators via the training delivered by the Head of PSD (see above).		
<b>Priority</b>	<b>2</b>	<b>Timescale</b>	31/01/2022	<b>SWAP Ref:</b>	45977
<b>1.1c Recommendation</b>					
We recommend that the Head of Professional Standards ensures all Investigating Officers record a written declaration confirming whether or not there is anything that could reasonably give rise to a concern about whether they or any member of the investigation team could act impartially at the earliest opportunity.					
<b>Agreed Action</b>			<b>Follow Up Assessment</b>		<b>Complete</b>
Agreed to ensure this is introduced into our processes and that Investigators are reminded of this requirement under the legislation as part of our monthly CPD training.			The Head of PSD has confirmed that all Investigating Officers were reminded in an email of the requirement to ensure a written declaration is completed for all cases.		
<b>Priority</b>	<b>2</b>	<b>Timescale</b>	15/12/2021	<b>SWAP Ref:</b>	45978
<b>1.1d Recommendation</b>					
We recommend that the Head of Professional Standards implements regular dip checking of resolved complaints, conduct and performance matters to ensure that they are compliant with statutory requirements and agreed processes.					
<b>Agreed Action</b>			<b>Follow Up Assessment</b>		<b>Complete</b>
This will be built into the Sergeant Review Process which was introduced at the end of 2020 and is scrutinised at our monthly SLT meetings.			As noted above, data quality within Centurion is reviewed on a bi-monthly basis. The findings together with any learning from these checks is reported to PSD's Senior Leadership Team.		
<b>Priority</b>	<b>2</b>	<b>Timescale</b>	31/01/2022	<b>SWAP Ref:</b>	45979
<b>1.2a Recommendation</b>					
We recommend that the Head of Professional Standards clarifies whether or not a person under investigation is entitled to receive a copy of an Investigation Report where Reflective Practice Review Process (RPRP) is determined as the outcome and ensures that this is implemented into the current process where it is determined that it should occur.					
<b>Agreed Action</b>			<b>Follow Up Assessment</b>		<b>In Progress</b>
A copy of the Investigation Report should be shared with the person under investigation where appropriate and in line with the regulatory framework. This will be communicated to all Investigators as part of our monthly training.			The Head of PSD has established that the IOPC do not share their reports with interested persons due to the personal data included. They complete a short synopsis that is used instead. The Force are exploring a similar approach which should be in place by the end of the calendar year.		
<b>Priority</b>	<b>3</b>	<b>Timescale</b>	15/12/2021	<b>SWAP Ref:</b>	45980
			<b>Revised Timescale</b>		31/12/2022





**1.3a Recommendation**

We recommend that the Head of Professional Standards ensures all officers and staff in charge of completing RPRP ensure:

- An account from the participating officer is obtained.
- The Appointment of Investigator Form is completed.
- Learning identified through RPRP is captured within Centurion.
- Cases are correctly categorised as RPRP and not Reflective Practice in Centurion.

In addition, the Head of Professional Standards clarifies whether the Appropriate Authority ought to be informed of the outcome of RPRP in cases.

Agreed Action		Follow Up Assessment		Complete
Agreed to discuss and communicate this as part of our monthly CPD Training.		The requirements noted within the recommendation were confirmed to have been communicated to Investigating Officers via email as well as at the training sessions delivered to investigators following the completion of the original audit. With regards to learning to be captured within Centurion for RPRP cases, this is not a national requirement and has therefore not been introduced.		
Priority	2	Timescale	15/12/2021	SWAP Ref: 45981

**1.3b Recommendation**

We recommend that the Head of Professional Standards implements regular dip sampling to ensure learning is being captured and recorded properly within Centurion and that there is evidence to support that any learning identified has been implemented (e.g. through confirmation from line managers etc.). For example, this could include running regular reports from Centurion on resolved conduct, complaints, performance and RPRP cases with no learning recorded and checking whether or not this is accurate by reviewing source data (e.g., an Investigation Report, RPRP Report etc.). Appropriate action should be taken where poor or unsatisfactory performance is identified.

Agreed Action		Follow Up Assessment		Complete
PSD will conduct a regular review to ensure learning is being captured and recorded appropriately.		As noted above, data quality within Centurion is reviewed on a bi-monthly basis. This includes a review of whether learning has been captured and recorded within Centurion for the cases sampled, where applicable. The findings together with any improvements identified from these checks is reported to PSD's Senior Leadership Team.		
Priority	2	Timescale	31/01/2022	SWAP Ref: 45982