



THE CHIEF CONSTABLE OF CLEVELAND

Positive Action (Workforce Representation, Attraction, Recruitment, Progression and Retention)

Internal audit report 15.20/21

FINAL

11 May 2021

This report is solely for the use of the persons to whom it is addressed.

To the fullest extent permitted by law, RSM Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party.

1. EXECUTIVE SUMMARY

With the use of secure portals for the transfer of information, and through electronic communication means, remote working has meant that we have been able to complete our audit / assignment and provide you with the assurances you require. It is these exceptional circumstances which mean that 100 per cent of our audit has been conducted remotely. Based on the information provided by you, we have been able to sample test the control framework.

Why we completed this audit

All public sector organisations have a legal duty for Equality, Diversity and Inclusion known as the Public Sector Equality Duty (PSED), which came into force in 2011. The Equality Act 2010 protects people from discrimination and covers nine protected characteristics: age, disability, sex, gender reassignment, race, marriage and civil partnership, pregnancy and maternity, religion or belief, and sexual orientation.

The HMICFRS Peel Assessment report conducted in 2018 highlighted that 'the Force does not treat its workforce with fairness and respect and does not effectively communicate with or engage its workforce'.

In late 2018, the National Police Chiefs' Council (NPCC) issued the 2018-2025 Workforce Representation, Attraction, Recruitment, Progression and Retention toolkit with the aim to provide guidance to enhance positive action to regional constabularies. The NPCC / the Association of Police and Crime Commissioner (APCC) Policing Vision 2025 states that (by 2025) policing will be a profession with a more representative workforce that will align the right skills, powers and experiences to meet challenging requirements. The NPCC toolkit is a template for forces and sets out six key components to successfully achieving the vision by focusing and we have considered these components as part of our review:

- Leadership and Culture;
- Attraction / Recruitment;
- Retention;
- Progression;
- Wellbeing and fulfilment; and
- Exit from service with dignity.

The Office of the Police and Crime Commissioner (OPCC) works with Cleveland Police to deliver the equality, diversity and inclusion (EDI) programme. The Everyone Matters programme was reinvigorated in 2019. The vision is to create an organisation, which encourages people to thrive by valuing difference. A newly formed team comprising of two EDI Managers and three EDI Officers was in post for March 2020 with the aim of providing a programme approach to deliver projects that improve the organisational capacity and capability on EDI, as well as providing support, advice and scrutiny to the Force.

The objective of our review was to ensure the organisation has an appropriate framework in place to monitor the implementation of the NPCC's Workforce Representation – Attraction, Recruitment, Progression and Retention toolkit.

At the time of the audit, the Force did not have an approved position action delivery and progress plan in place to set out actions against the NPCC Workforce Representation – Attraction, Recruitment, Progression and Retention toolkit. The EDI Manager collaborated with key contributors in positive action initiatives to provide an update on the Force's position in relation to positive action. We have used this update to sample test initiatives to comply with the key components of the NPCC Workforce Representation – Attraction, Recruitment, Progression and Retention toolkit.

Conclusion

At the time of the audit, the Force did not have a formalised action and delivery plan against the NPCC Workforce Representation – Attraction, Recruitment, Progression and Retention toolkit. The toolkit is intended to be used by forces as a template for positive action planning to support the NPCC / APCC Policing Vision 2025; however, it is not described as mandatory.

The EDI Manager, Head of HR, Recruitment Manager, Head of L&D and the OD Manager worked in collaboration to develop a holistic position on the Force's approach to positive action benchmarked against the NPCC Workforce Representation – Attraction, Recruitment, Progression and Retention toolkit. Our opinion is based on the holistic position provided by the EDI Manager; however, we also recognise that the Force still have work to complete in implementing a formalised positive action and delivery plan (as per the NPCC toolkit) and we have agreed a management action to this effect.

In late March 2021, the Director of People and Development (P&OD) took a draft report to the EDI Board for comment, and the final draft will be taken to the next meeting at the end of May. The Director of P&OD along with the two ACCs are working together as joint sponsors to ensure that the Force has one joined up seamless plan. The role of the EDI team will then be to act as advisors to support the delivery of the plan.

The Organisational Development Manager is leading on the attraction strategy, and the Recruitment Manager has proposed several improved approaches to positive action on a continuous basis and a task and finish group to align the recruitment approach with community engagement, building on work already being done with the communities.

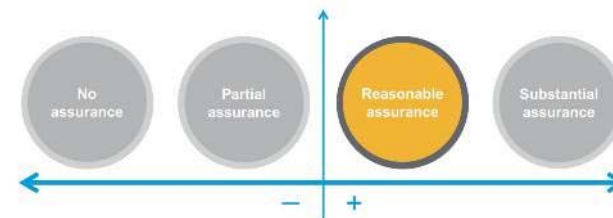
Whilst the Force accept that there is still plenty of work to be completed in respect of positive action, our review of a sample of 18 workstreams from the NPCC toolkit established that the Force are making good progress in implementing positive action initiatives, which are overseen by the EDI Strategic Board (chaired by the Deputy Chief Constable). There is collaboration between the EDI Team and the Force on key initiatives in respect of positive action, such as, recruitment bulk campaigns, induction, and communications. We have outlined the Force's uplift figures under Appendix B.

As a result of our review, we have agreed **two medium** and **four low** priority management actions.

Internal audit opinion:

Taking account of the issues identified, the Chief Constable of Cleveland can take **reasonable assurance** that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk.



Key findings

Our audit identified the following exceptions resulting in two medium priority actions:



The EDI Manager has collaborated with key Force contributors to establish the Force's position in relation to the positive action plan (as benchmarked against the NPCC toolkit). At the time of the audit, the Force did not have an approved and established action and delivery plan in place for positive action; however, we found evidence that the Force was making progress in respect of positive action through the implantation of the EDI Team. Reporting on positive action occurs at the EDI Strategic Board, which is chaired by the Deputy Chief Constable, to ensure that development and delivery on the Force's EDI strategy (2020-2025) is sufficiently monitored. The Force's EDI strategy is set out within three key strategic themes: Our People and Organisation, Our Communities, and Our Partners.

As per the scope of our audit, we conducted a sample test of NPCC toolkit workstreams to evaluate the actions taken by the Force in addressing each selected workstream. We would suggest the Force implement an approved action and delivery plan against the NPCC toolkit and consider the findings of this review. Where the Force do not have an action and delivery plan in place for positive action, there is a risk that the Force do not have an appropriate framework to monitor the implementation of positive action initiatives. **(Medium)**



Attraction / Recruitment

Forces must equip selection panels with unconscious bias training for all those involved in the recruitment process (tactical).

The Force have an e-learning mandatory training module in place for unconscious bias training through the National Centre for Applied Learning Technologies (NCALT). There have been 918 module completions to date (comprising of 37% police staff and 63% officers and special constables).

We met with the Recruitment Manager to verify that selection panels within the recruitment process had completed unconscious bias training; however, it was explained that records of selection panels are not maintained. Where selection panels are not documented, there is a risk the Force cannot evidence selection panels were fair and transparent in the event of a complaint. **(Medium)**

For details of the low priority management actions, please see section two of this report.

Our audit review also identified that the following controls are suitably designed, consistently applied and are operating effectively:

Leadership and Culture



Police leaders should develop a culture where staff feel confident to disclose their protected characteristics (strategic).

Through discussions with the Recruitment Manager, we established that the Home Office have requested forces complete a data standardisation exercise to ensure that all forces use a standardised data set for protected characteristics. This task must be completed by 31 March 2021. The Force are in the process of completing this data standardisation exercise and have enabled a self-service data input facility within the Oracle system to allow individuals to update protected characteristics, as and when required.

The Force intend on releasing a communications campaign once the data standardisation has been completed to promote the update of protected characteristics, and as such, we have considered the progress taken by the Force to be sufficient against the NPCC toolkit.

Attraction / Recruitment



Each Force to undertake a detailed analysis of workforce data (strategic).

The EDI Annual monitoring report for 2019 / 2020 is available on the Cleveland Police and Crime Commissioner websites. The report outlines comparative workforce representation data for the 2018 / 2019 and the 2019 / 2020 financial years. The data outlines gender and ethnicity demographic data for officers and staff for both the Chief Constable and the Office of the Police and Crime Commissioner.

The Force accept there is a proportion of data where officers and staff have outlined data in respect of protected characteristics is unknown. Discussions with the Recruitment Manager established that this is a historic issue in the data set, and appropriate data is obtained at the point of recruitment. The Force outline its commitment to maintaining the 'prefer not to say' option in its protected characteristics data set, particularly given that Cleveland Police is a small force. We are satisfied with the approach the Force are taking with regards to its workforce data set.



NPCC to review its vetting approach to diversity ARRP, with a priority to BME (strategic).

The Force have developed a process for reviews of vetting refusals and vetting applications for BME applicants. The Deputy Chief Constable (DCC) oversees the vetting processes, including refusals of vetting clearance.

The Force do not currently have a BAME appeals panel in place; however, as the Force sees a very small number of BAME candidates fail the vetting process, we would suggest that this is a reasonable approach. In 2020, Core Vet system data states that only 28 applicants from a total of 1,095 applications processed within the same year, were refused vetting clearance. Of the 28 failed applicants, only one applicant was declared as one of the listed ethnicities.

For future development and as part of the Force's commitment to EDI, the Director of Standards and Ethics Superintendent has set up a working group with key collaborators to ensure that findings from the NPCC's Understanding Disproportionately in Police Complaint and Misconduct for BAME Police Officers and Staff 2019 are considered.



Consider longer-term engagement with schools and colleges in arranging work shadowing, placements and experience in order to attract future applicants (tactical).

The Force engage with local young people through School Liaison Officers who provide a range of programmes at local schools. From January 2020 to January 2021, the School Liaison Officers have delivered interventions to 24,520 pupils. Interventions have included sessions on online safety, anti-social behaviour and knife crime. The interventions further include more general sessions focused on policing careers, such as career input, the boys in blue and meet the police. It was noted that the School Liaison Officers have continued to deliver a wide range of programmes despite the Covid-19 pandemic; however, numbers of children engaged may be lower due to school closures.

The Force previously offered a ride along scheme; however, this scheme has had to be suspended due to the Covid-19 pandemic. It is unclear when or if this scheme will be re-introduced.

Evidence of further engagement with local universities, colleges and community groups was provided during the audit, for example:

- The Chief Constable delivered a recruitment session to Teesside University students in 2020;
- The Force have appointed single point of contacts (SPOC) in the EDI Team for community groups to further collaborate with local communities; and
- Involvement with the Tees Valley Girls Network through collaboration with the Assistant Chief Constable (ACC). The Force delivered positive action recruitment events in February 2021 for female and BAME candidates.

Retention



Forces are encouraged to recognise good work, bravery, innovation and community engagement (strategic).

The Force has a variety of awards available to recognise good work, bravery, innovation, and community engagement. Awards include Recognition of Outstanding Service and Excellence (Rose) Awards, long service and good conduct ceremonies (including Chief Constable commendations), the Chief Constable's Award and informal reward and recognition. Due to Covid-19 restrictions, the Force has not been able to hold an awards ceremony in 2020.

In recognition of this and with an unclear timetable of when large gatherings will be permitted, the Force is currently running an amended awards process to reward and recognise outstanding contributions throughout the previous year. The nominations process is currently open and includes nominations for EDI, policing through the Covid-19 pandemic, and care and compassion.



Review flexible working practices together with cultural / religious observance (tactical).

The HR and EDI Team collaborate to issue briefings and guidance on various cultural and religious observances to ensure flexible working practices are adopted across the Force. Communications are issued via email and SharePoint, and have included detail on Ramadan, Diwali and religious and cultural New Year celebrations. The EDI Calendar outlines dates for cultural and religious observances throughout the year and is available for all employees, including line managers, to access via SharePoint. Further support is provided by the EDI Team, where required.

Progression



HR colleagues responsible for progression should be encouraged to understand the connectivity and interdependencies of a diverse workforce and cohesion leading to improved legitimacy with communities (strategic).

The Legal, HR, Communications and EDI Team collaborate when planning bulk recruitment campaigns. During the development of campaigns, the Recruitment Team and the EDI Team have developed a collaborative approach, which is further strengthened by regular meetings between both teams.

Force connections with staff networks help share progression opportunities with their members and the Force are further developing these relationships. The EDI Manager provided us with examples of collaborative work undertaken for the Force Control Room (FCR) Office campaign from October 2020 and the Police Community Support Officer (PCSO) campaign, which is still ongoing. The information provided includes EDI Team action plans in respect of positive action for each campaign, dedicated workshops and guidance documents.

The EDI Manager outlined that dedicated campaigns in bulk recruitment is the 'short-term' approach to positive action. The EDI Team is supporting further development to a move sustained approach for ongoing campaigns, rather than on a campaign-by-campaign basis. The EDI Team intend on collaborating further with the Community Engagement Team and local communities, for example, the Force have engaged digitally with the Ubuntu Multi Cultural Centre. The Force recognise there is further work to complete in respect of positive action recruitment processes; however, we were satisfied with the Force's current approach and future plans. The Force's uplift statistics are documented under Appendix B and benchmarked against other local forces.



Staff who are underrepresented in policing should at the commencement of their service be signposted to support groups to seek early guidance should it be required (tactical).

New recruits into Cleveland Police receive a Cleveland Police Welcome Pack, which includes signposts to staff networks, such as the Staff Association for Minority and Ethnic staff (SAME), Lesbian, Gay, Bisexual and Transgender (LGBT+) Network, and the Disability Support Network and Autism Association. Further guidance is provided on the Force's Code of Ethics, key policies and training courses, and the Force's values and behaviours. The new recruitment programme further includes education and signposting to staff networks and is included within the Force's brand induction workshops.

Wellbeing and fulfilment



Forces should focus on their staffs' emotional health and happiness and implement wellbeing initiatives to improve people's quality of life whilst at work.

RSM conducted a review of the Force's wellbeing processes in November 2020, which resulted in reasonable assurance. The Force have many wellbeing and fulfilment initiatives in place, including the Blue Light Network, Wellbeing Wednesdays, and weekly wellbeing newsletters. We further established that the EDI Team issue briefings in relation to key messaging and culturally focused events, for example, World Vegan Day, protests in history and communications on understanding white privilege.

Exit from service with dignity



Forces to scope partnership working opportunities and / or secondments outside of the organisation (tactical).

The HR Manager is reviewing current entry routes and conducting planning on revised entry routes for Cleveland police recruitment. The HR Manager submitted a business case for the development and delivery of an in-house graduate entry programme (lasting two years) to negate the need to use Police Now (a not for profit organisation which supports UK forces to attract individuals who have not considered working for the police or working within the police service). The focus would be to focus on a programme delivered in collaboration within a Higher Education Institution (HEI) provider, such as, Teesside University.

The HR Manager is further reviewing the current performance and development review (PDR) system and processes to improve the Force's talent identification model.



Forces to widely advertise re-joining opportunities (tactical).

The Force advertise re-joiner opportunities through the Force's recruitment platform. An example was provided of re-joiner advertisement for police constables issued in May 2020. The Force address re-joining on an ad-hoc basis depending on the individual's personal situation, for example, how far they are moving or how much service they have. We have raised management action six in relation to the Force's review of exit information, which will inform Force decisions going forward.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Risk: Risk Reference: 31		
Control	Missing control <p>The Force have established an action and delivery progress plan for positive action.</p> <p>The EDI Manager, Head of HR, Recruitment Manager, Head of L&D and the OD Manager worked in collaboration to compile the Force's position in relation to the NPCC Workforce, Representation, Attraction, Recruitment, Progression and Retention toolkit.</p>	Assessment: Design × Compliance -
Findings / Implications	<p>The EDI Manager has administered an exercise between all key contributors to understand the Force's position in relation to the NPCC Workforce Representation, Attraction, Recruitment, Progression and Retention toolkit. The findings have been compiled in a spreadsheet with responsible owners and commentary to provide an update on the Force's position in relation to each aspect of the toolkit.</p> <p>The benchmarking exercise has enabled the Force to confirm its current position in relation to positive action and will feed into the development of a positive action delivery and action progress plan. The implementation of which will be reported to the EDI Group.</p> <p>We have used the information provided within the benchmarking exercise to facilitate the testing of the audit of the five key areas in the NPCC toolkit: leadership and culture; attraction / recruitment; retention; progression; wellbeing and fulfilment; and exit from the service with dignity.</p> <p>Where the Force do not have an action and delivery plan in place for positive action, there is a risk that the Force do not have an appropriate framework to monitor the implementation of positive action initiatives.</p> <p>In late March 2021, the Director of People and Development (P&OD) took a draft report to the EDI Board for comment, and the final draft will be taken to the next meeting at the end of May. The Director of P&OD along with the two ACCs are working together as joint sponsors to ensure that the Force has one joined up seamless plan. The role of the EDI team will then be to act as advisors to support the delivery of the plan.</p> <p>The Organisational Development Manager is leading on the attraction strategy, and the Recruitment Manager has proposed several improved approaches to positive action on a continuous basis and a task and finish group to align the recruitment approach with community engagement, building on work already being done with the communities.</p>	

Management Action 1	<p>The Force will develop an action and delivery plan for positive action to outline actions in respect of the NPCC toolkit.</p> <p>Actions will be assigned appropriate responsible owners in line with the three strategic workstreams:</p> <ul style="list-style-type: none"> • Organisation and People; • Communities; and • Partnerships. <p>Progress against the actions will be regularly reported to EDI Board.</p>	<p>Responsible Owner:</p> <p>Director of P&OD, ACC Local Policing, ACC Crime Head of HR Recruitment Manager</p>	<p>Date:</p> <p>31 August 2021</p>	<p>Priority:</p> <p>Medium</p>
----------------------------	--	--	---	---------------------------------------

Risk: Risk Reference: 31

Control	Leadership and Culture <u>Toolkit workstream: Appoint a NPCC lead in each Constabulary (DCC / ACC / ACO)</u> The Force have appointed the Deputy Chief Constable (DCC) as the Force leader for EDI.	Assessment: Design ✓ Compliance x
Findings / Implications	<p>The Everyone Matters Vision is outlined within the Force's EDI Strategy for 2020 to 2025. The Force's vision is to be diverse, inclusive and representative of the communities they serve, where every employee is an individual leader, with individual responsibility; and an organisation which encourages its people to prosper by valuing difference in the workplace. The responsibilities of the EDI Group have been outlined within the strategy.</p> <p>The DCC is the Force leader for equality, diversity and inclusion and has identified a need for further support and accountability across the Force to drive positive action goals (as per the NPCC toolkit). The aims of the NPCC toolkit will be organised into three key workstreams, with a responsible leader for each area for implementing the aims of the positive action plan. The workstreams will sit as follows:</p> <ul style="list-style-type: none">• Organisation and People: Director of People & Development• Communities: Assistant Chief Constable, Local Policing; and• Partnerships: Assistant Chief Constable, Crime. <p>The EDI Team will provide advice to each workstream lead in the development of action plans and key performance indicators (KPI) to measure the achievement of objectives. There is further work to be completed in respect of cross-cutting dependencies in relation to action plans that the EDI Team and workstream leaders will need to collaborate on and agree action plans which avoid duplication.</p> <p><i>See management action one.</i></p>	

Risk: Risk Reference: 31

Control	Attraction / Recruitment <u>Toolkit workstream: Forces must equip selection panels with unconscious bias training for all those involved in the recruitment process (tactical).</u> The Force have a mandatory e-learning through the National Centre for Applied Learning Technologies (NCALT) for unconscious bias training.	Assessment: Design ✓ Compliance ×		
Findings / Implications	Discussions with the Organisational Development (OD) Manager established that the Force have a mandatory training module through the NCALT system on unconscious bias training. The Organisational Development (OD) Manager confirmed that there have been 918 completions on the unconscious bias training package (totalling 37% police staff and 63% officers and special constables). The unconscious bias training was first released in March 2018. There are further supplementary tools on the Force's 'leadership skills for all' resource on the intranet, which is available to all Force employees. We understand that the Force have undertaken a leadership audit of all employees (based on College of Policing (CoP) competency and values framework and Force values) to understand learning capacity and capability. This ended 14 February 2021 and results are currently being reviewed. The results of the audit are set to be included in the development of a Leadership Development Framework, which will be available to police staff and police officers at all levels. Work is due to commence at the end of March 2021 once results have been reviewed. The Leadership Development Framework will deliver Personal, Organisational and Command development opportunities. We met the Recruitment Manager to discuss unconscious bias training in relation to selection panels. The Recruitment Manager explained that a member of the selection panel will always have completed the unconscious bias training; however, as the Recruitment Team do not document selection panel members, we were unable to verify that selection panels were appropriately trained in unconscious bias training. Where selection panels are not documented, there is a risk the Force cannot evidence selection panels were fair and transparent in the event of a complaint.			
Management Action 2	The Recruitment Manager will ensure that members of selection panels are documented.	Responsible Owner: Head of HR Recruitment Manager	Date: 31 July 2021	Priority: Medium

Area: Risk Reference: 31

Control	Missing control Retention <u>Toolkit workstream: Forces are encouraged to promote and utilise cultural exchange programs within law enforcement to enhance community cohesion (tactical).</u> The Force are conducting a leadership training needs analysis audit, which can include consideration of a cultural exchange program.	Assessment:		
		Design		x
		Compliance		-
Findings / Implications	<p>The positive action plan overview provided by the EDI Manager and key collaborators outlined that the promotion and utilisation of cultural exchange programs within law enforcement is currently a gap within the Force's response to positive action. The NPCC toolkit outlines that Forces should review established relationships and look to develop new ones to add opportunities for an increased use of a cultural exchange scheme.</p> <p>We understand that this can be explored further within the leadership training needs analysis to determine whether a cultural exchange program would be advantageous. Where the Force have not explored the possibility of promoting and utilising cultural exchange programs, there is a risk the Force are missing networking opportunities and the chance to exchange best practise with other forces.</p>			
Management Action 3	The promotion and utilisation of cultural exchange programs within law enforcement will be considered as part of the Force's leadership training needs analysis review.	Responsible Owner:	Date:	Priority:
		Organisational Development Manager	31 August 2021	Low

Risk: Risk Reference: 31

Control	Progression <u>Toolkit workstream: Forces to review their promotion and lateral progression policies and procedures (strategic).</u> The Force operate numerous policies in relation to promotion and lateral progression. An equality impact assessment is completed for all policies to ensure a fair and transparent approach is adopted.	Assessment:		
		Design		✓
		Compliance		x
Findings / Implications	<p>The Force have numerous policies in place relating to promotion and lateral progression. We were provided with three relevant policies: Mentoring Scheme Policy; Acting up and Temporary Duties Policy; and Succession Planning Policy.</p> <p>Each policy outlines the Force's commitment to a fair and transparent approach in applying the policies and we verified all policies had undergone an equality impact assessment as part of the review process. However, it was noted the Mentoring Scheme Policy was last reviewed and approved by the Management Board on 4 January 2017. The next review date was scheduled for November 2020; however, this is still to be completed.</p>			

Risk: Risk Reference: 31

The Organisational Development Team are working to make improvements to the existing Mentor Scheme and prepared a report to the People and Wellbeing Board in January 2021 to outline plans. The purpose is for the Force to transition from a 'traditional' form of mentoring (linked to succession, talent, and career progression) to mentoring around a broad range of areas to support our staff and community.

The NPCC's workstream suggests that forces consider removing line manager support for all advertised roles or promotion opportunities. Discussions with the Recruitment Manager established line managers still have an input on the promotions and temporary rank appointments. Line manager recommendation forms must be completed to ensure a consistent approach is applied.

We understand the timing around exams is currently being reviewed on a national level. The Exam Officer liaises with the College of Policing to allow for reasonable adjustments to be made.

Where promotion and lateral progression policies have not been appropriately updated and considered in respect of positive action, there is a risk that the Force are not adopting a fair and transparent approach.

Management Action 4	The Force are making improvements to the existing Mentor Scheme from its 'traditional' form to a 'broader' mentoring format. The Mentoring Scheme Policy will be updated and approved once the review is completed.	Responsible Owner: Head of HR Organisational Development Manager	Date: 31 October 2021	Priority: Low
----------------------------	---	---	---------------------------------	--------------------------------

Risk: Risk Reference: 31

Control	Missing control Progression <u>Toolkit workstream: Forces should at the conclusion of the selection processes, grievance procedures and misconduct-related procedures, specially review any learning in respect of disadvantages or barriers relating to protected characteristics (tactical).</u> The Head of HR intends to report to the People and Wellbeing Delivery Board regarding grievances by the end of the current calendar year. This will include common themes, lessons to be learnt and what learning has been implemented.	Assessment: Design × Compliance -
Findings / Implications	As Cleveland Police are a small force, we understand that the number of grievance and misconduct-related proceedings whereby protected characteristics are disadvantages or barriers are relatively low. The Head of HR outlined some examples in discussions; however, these were historic.	

Risk: Risk Reference: 31

To ensure the confidentiality of those involved, reporting structures in place are currently minimal for these types of occurrences. Lessons learnt, common themes and what learning has been implemented is considered on an ad-hoc basis. However, if the Force do not adopt a lessons learnt approach, which is thoroughly documented and considered, there is a risk that the Force do not improve processes in relation to grievances, selection processes and misconduct.

Management Action 5	The Head of HR will develop a confidential review process for selection, grievances and misconduct-related processes in respect of protected characteristics to ensure a lessons learnt approach is adopted and documented. Additional advice will be provided from the EDI Team.	Responsible Owner: Head of HR Superintendent, DSE	Date: 31 December 2021	Priority: Low
----------------------------	--	--	----------------------------------	--------------------------------

Risk: Risk Reference: 31

Control	Exit from service with dignity <u>Toolkit workstream: Forces are to undertake a review of current exit from service procedures (strategic).</u> The Force have an Exit Policy, questionnaire, and HR process in place to understand unplanned leavers motivations. Chief Officers also offer all leavers an exit meeting opportunity.	Assessment: Design ✓ Compliance ×
----------------	--	--

Findings / Implications	<p>The Force's Exit Policy is currently under review. The next review date for the policy was originally recorded as May 2020.</p> <p>The workstream actions state that the Force should review what steps are currently in place to capture exit information from all those leaving the organisation. The Force capture this information through exit questionnaires, the HR process and through Chief Office exit meeting opportunities. Further, a representative from DSE makes telephone contact after leaving to discuss with the leaver and confidential issues they may wish to raise.</p> <p>However, discussions with the Head of HR established that data regarding motivations for leaving is not currently shared with the EDI Manager. As Cleveland Police are a small force, exit information is kept highly confidential as it can identify individuals which may inadvertently lead to a breach of GDPR. Notwithstanding the confidentiality of such information, the EDI Team would benefit from receiving data regarding exit information to make informed decisions, particularly in relation to protected characteristics.</p> <p>Where exit information is not appropriately, yet still confidentially, shared across the Force, there is a risk that the Force cannot make key decisions in respect of leaver motivations.</p> <p>The management action raised also feeds into the NPCC toolkit retention strategic workstream, which outlines that Forces should undertake an evolution of retention figures and determine rationale for colleagues leaving prematurely.</p>
--------------------------------	--

Risk: Risk Reference: 31

Management Action 6	<p>The Force are currently reviewing the Exit Policy.</p> <p>A confidential reporting structure for exit information will be developed with the intention of ensuring that the EDI Team have access to key information in relation to protected characteristics.</p> <p>The EDI Team will investigate and propose whether there is further work to be done to support those with protected characteristics from leaving the Force.</p>	Responsible Owner: Head of HR Senior Business Partner (ER)	Date: 31 December 2021	Priority: Low
----------------------------	--	---	----------------------------------	--------------------------------

APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Risk	Control design not effective*		Non Compliance with controls*		Agreed management actions		
					Low	Medium	High
Risk Reference: 31	3	(19)	3	(19)	4	2	0
Total					4	2	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: FORCE UPLIFT FIGURES (ETHNICITY AND GENDER)

Cleveland Police provide police officer uplift statistics to the Home Office on a monthly basis. The below data highlights the Force's position by North East Force and Region for gender and ethnicity for current officers (C) and new recruits (NR) as at December 2020.

By Gender

By Force (North East)	Male		Female		Prefer to self-describe		Not stated		Total	
	C	NR	C	NR	C	NR	C	NR	C	NR
Cleveland	994	64	411	48	-	-	-	-	1405	112
Durham	794	42	402	35	-	-	-	-	1196	77
Northumbria	2225	169	1170	152	-	-	-	-	3395	321

By Region	Male		Female		Prefer to self-describe		Not stated		Total	
	C	NR	C	NR	C	NR	C	NR	C	NR
North East	4013	275	1983	235	-	-	-	-	5996	510
North West	11504	538	5925	413	-	-	-	-	17429	951
Yorkshire and the Humber	7545	429	4264	310	-	-	-	-	11809	739

By Ethnicity

By Force (North East)	White		Black		Asian		Mixed		Other		Prefer not to say		Not Stated		Total		BAME %	
	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR
Cleveland	1353	104	-	-	25	3	6	1	-	1	-	3	21	-	1405	112	2.2	4.6
Durham	1174	76	1	-	6	1	11	-	1	-	-	-	3	-	1196	77	1.6	1.3
Northumbria	3184	182	3	1	39	12	42	7	7	3	-	-	120	116	3395	321	2.8	11.2

By Region	White		Black		Asian		Mixed		Other		Prefer not to say		Not Stated		Total		BAME %	
	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR	C	NR
North East	5711	362	4	1	70	16	59	8	8	4	-	3	144	116	5996	510	2.4	7.4
North West	16154	851	105	13	485	53	315	18	65	5	72	4	233	7	17429	951	5.7	9.5
Yorkshire and the Humber	11174	670	91	7	350	37	79	10	68	9	47	6	-	-	11809	739	5.0	8.6

APPENDIX C: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The internal audit assignment has been scoped to provide assurance on how the Chief Constable of Cleveland manages the following risk:

Objective of the area under review	Risk relevant to the scope of the review	Source
The organisation has an appropriate framework in place to monitor the implementation of positive action initiatives.	Risk Reference: 31	Chief Constable's strategic risk register

Scope of the review

The HMICFRS PEEL Assessment report highlighted 'The Force does not treat its workforce with fairness and respect and does not effectively communicate with or engage its workforce.' As a mitigating control the Force will take positive action in terms of recruitment. In late 2018, the National Police Chiefs' Council (NPCC) issued the 2018-2025 Workforce Representation, Attraction, Recruitment, Progression and Retention toolkit with the aim to provide guidance to enhance positive action to regional constabularies.

Our review will confirm the toolkit used to formulate and direct a positive action delivery and progress plan has been undertaken, and in particular we will consider the following key components:

- Leadership Culture;
- Attraction / Recruitment;
- Retention;
- Progression;
- Wellbeing and fulfilment; and
- Exit from service with dignity.

We will review the action plan in place to confirm this reflects the key requirements of the Workforce Representation – Attraction, Recruitment, Progression and Retention Toolkit. We will confirm, through sample testing, that key initiatives have been achieved and confirm this back to source documentation.

We will also consider the governance reporting arrangements throughout the organisation on the achievement of the key components.

The following limitations apply to the scope of our work:

- Testing will be completed on a sample basis, so we cannot confirm all components have or will be achieved.
- We will not review the whole control framework of the areas listed above. Therefore, we will not provide assurance on the entire risk and control framework.
- We will not review policies and procedures for adequacy or confirm their application in practice.
- We will not comment on the appropriateness of the actions taken, but confirm they are in place or being worked towards.
- We will not confirm all actions will be completed in the required timeframe.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

Debrief held	9 March 2021	Internal audit Contacts	Daniel Harris, Head of Internal Audit
Draft report issued	22 March 2021		Angela Ward, Senior Manager
Responses received	11 May 2021		Philip Church, Client Manager
			Mike Gibson, Assistant Manager
			Hollie Adams, Senior Auditor
Final report issued	11 May 2021	Client sponsor	Director of HR
		Distribution	Director of HR

rsmuk.com

The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of **The Chief Constable of Cleveland**, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

This report is released to you on the basis that it shall not be copied, referred to or disclosed, in whole or in part (save as otherwise permitted by agreed written terms), without our prior written consent.

We have no responsibility to update this report for events and circumstances occurring after the date of this report.

RSM Risk Assurance Services LLP is a limited liability partnership registered in England and Wales no. OC389499 at 6th floor, 25 Farringdon Street, London EC4A 4AB.