



THE CHIEF CONSTABLE FOR CLEVELAND

[HR: Training](#)

Internal audit report 2.23/24

Final

29 September 2023

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1. EXECUTIVE SUMMARY

With the use of secure portals for the transfer of information, and through electronic communication means, a proportion of our audit has been conducted remotely. Remote working has meant that we have been able to complete our audit and provide you with the assurances you require. Based on the information provided by you, we have been able to sample test, or undertake full population testing using data analytics tools, to complete the work in line with the agreed scope.

Why we completed this audit

This review has focused on whether the Force has adequate systems in place to ensure mandatory training requirements are managed, recorded and refreshed within the required timeframe, and we have focused on officer training.

The Force has been subject to a national and external evaluation in relation to its training arrangements, which has resulted in numerous findings which have been consolidated into a transformation project. The Force is currently in the first year of its transformation project. The Force has established a Compliance and Course Attendance Group, which is chaired by the Chief Inspector Learning and Development and attended by the stakeholders from the HR Team, Resource Management Unit (RMU) and the Learning and Development Team to raise any issues or non-attendance at in-person training.

The Force has developed a Developing You, Learning and Development Policy and the Learning and Development Procedure, which were undergoing consultation at the time of our audit and due for Executive Management Board sign off on 12 September 2023.

The Force uses the Oracle system to record and manage in-person mandatory training. In-person training that is mandated for officers include first aid training (refreshed annually), personal safety training (refreshed annually) and driver training (initial basic driver assessment, standard driver and/or advanced driver training). Supervisors are required to inform the Training Administration (TA) Team of officers requiring initial first aid, personal safety, and driver training. This is then booked onto the Duty Management System (DMS) by the RMU. Once training is completed, the expiry date is recorded on Oracle which informs the RMU Planning Officer to book any refreshers. Supervisors are required to inform the TA Team of officers requiring refreshed driving training, which is completed every five years.

Mandatory e-learning training is completed and recorded on College Learn which is the national police digital learning system. College Learn contains learning products created by the College of Policing and bespoke packages created in-house by the Digital Learning Team.

Conclusion

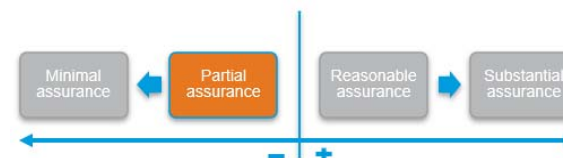
Our review identified weaknesses in the design of the controls in place to ensure training requirements are managed, recorded, and refreshed within the required timeframe. Our testing of 10 new starters (officers and specials) and 10 existing officers and specials identified non-compliance with the completion of e-learning training and initial and refresher personal safety, first aid and driver training. Our review also identified that supervisors are responsible for monitoring the completion of mandatory training which officers and specials are required to complete; however, the Force does not report on the compliance of mandatory in-person training through the Force's governance structure.

Our testing has identified a number of non-compliance with controls and as a result we have agreed **one high, four medium, and 10 low** priority actions and **one advisory action** with management. The one high priority management action relates to the compliance rates for mandatory e-learning training.

Internal audit opinion:

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

Action is needed to strengthen the control framework to manage the identified area.



Key findings

We have identified the following one high priority issue for which an appropriate action has been agreed with management. Details on the four medium and 10 low priority actions are provided in section two of this report.



We selected a sample of 10 new starters and 10 officers to determine whether e-learning had been completed for 10 selected mandatory courses. Our results evidenced low compliance rates, which has been supported by the data analysis carried out as part of this review (see Appendix A). For one course in the sample, only two individuals from our sample had completed this course (10%). Compliance rates from our sampling for another six courses ranged from 26% to 55%, and the final three course compliance rates were over 60%.

Given that these courses are mandatory e-learning packages, where officers have not carried out the required e-learning, there is a risk that they are not adequately trained to carry out their duties effectively. **(High)**

We identified the following areas of good control design which, based on our testing, were being complied with in practice:



The Force has developed a costed Training Needs Analysis (TNA) 2023/24 with the Heads of Department, Chief Inspectors and Chief Superintendents within each business area which covers internal and external requirements. Items on the TNA have been prioritised using a red, amber, or green (RAG) rating and costed with the Chief Finance Officer. The TNA informs the annual Training Plan 2023/24 which has been developed and maintained by the Learning and Development Team. The TNA and Training Plan were approved by the Chief Officer Team on 30 May 2023.



Review of the agenda for the Learning and Development Governance Group meeting held on 17 January 2023, 17 May 2023 and 26 June 2023 confirmed that 'Governance TNA delivery' is a standing agenda item. We confirmed this agenda item includes review of the TNA 2023/24 and the associated Training Plan to ensure these remain up to date of external and internal training requirements.

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.

Area: Policies and procedures				
Control	Partially missing control		Assessment:	
	The Force has drafted a Developing You, Learning and Development Policy and a Learning and Development Procedure.		Design	×
	The Developing You, Learning and Development Policy is currently under review and will be approved by the Executive Management Board in September 2023.		Compliance	-
Findings / Implications	<p>Discussions with the Head of Learning and Development confirmed that the Force has drafted a Developing You, Learning and Development Policy and a Learning and Development Procedure, both of which are currently under review. The Force is planning to report the Developing You, Learning and Development Policy and the Learning and Development Procedure to the People and Wellbeing Assurance Board on 22 August 2023 and then the Executive Management Board on 12 September 2023 for final approval. The supporting procedure is due to be reported to the Learning and Development Governance Group on 26 June 2023.</p> <p>The draft policy included regulations which underpin the policy, key processes such as the TNA, scheduling and planning training, and also attendance at training. However, the policy does not highlight what training is considered mandatory or how the Force determines what is considered mandatory.</p> <p>Without an approved policy which outlines mandatory training requirements, there is a risk that requirements for mandatory training may not be understood across the Force.</p> <p>We further noted through review of the procedure and discussions with key staff, that the process for requesting mandatory in-person training, booking this and managing refresher training was not clearly outlined within the procedure or fully understood across the Force. As the managing of in-person training requires involvement from multiple departments, it would be beneficial to ensure that the procedure clearly records this process, to mitigate any risk of confusion which could lead to non-compliance with mandatory training requirements.</p>			
Management Action 1	The Developing You, Learning and Development Policy or the Learning and Development Procedure will be updated to record the training that is mandatory for officers to complete and outline roles and responsibilities for managing in-person training between departments.		Responsible Owner:	Date:
	Once the policy and procedure is approved, the documents will be made available and communicated to all officers.		Head of Learning and Development	31 January 2024
				Priority:
				Low

Area: Mandating training requirements

Control	<p>The requirement for officers to complete and refresh first aid, personal safety and driver training is a national requirement.</p> <p>Mandatory e-learning training, including training refresher requirements, is requested by a sponsor from within the Force and is approved by the Learning and Development Governance Group.</p>	Assessment:		
		Design		✓
		Compliance		×
Findings / Implications	<p><u>In-person training</u></p> <p>Three in-person training courses are considered mandated for all officers: first aid training; personal safety training; and driver training. These courses are a national requirement and are therefore included in the Force's Training Plan 2023/24.</p> <p>Forces are required to consider the proportion of officers who are required to complete and refresh driver training to meet the demand of the Force. The Chief Superintendent Local Policing identified this as 60% of neighbourhood response drivers and 80% of incident response drivers at the Force. It was decided by the Chief Superintendent Local Policing at the IMPACT meeting (to note, this meeting is not minuted) that all officers are required to undertake a level of driver training, ranging from initial basic to advanced. Initial driver training allows an officer to drive a police vehicle, but an officer would not be permitted to respond to an incident using blue lights.</p> <p>There is no evidence available to ratify the decision in respect of initial basic driver training. It would be recommended that the Force ensure actions and decisions are clearly documented, to provide adequate audit trail of key decisions.</p>			
	<p><u>E-learning training</u></p> <p>Chief Inspectors and above can request the Digital Learning and Design Team to produce e-learning packages, and request that these be mandated using a digital learning commissioning form. The requestor is contacted to discuss the request, including who should complete training and whether refreshers are required.</p> <p>The Learning and Development Governance Group was asked to review e-learning training with sponsors to confirm which packages continue to be mandated. The Chief Inspector Learning and Development reported to the Group which packages are mandated on June 2023, although there are no meeting minutes to evidence this. Going forward, all e-learning package requests will be reported to the Group for approval, which includes decisions around mandating and refresher training.</p>			
Management Action 2	<p>The Force will ensure the decision and approval to mandate training will be recorded for example within the relevant action and decision log. This will be included an agenda item at the Learning and Development Governance Meeting.</p>	Responsible Owner:	Date:	Priority:
		Head of Learning and Development	31 October 2023	Low

Area: Mandatory e-learning set up

Control	<p>The mandatory e-learning training including the requirement to refresh training is recorded on the College of Policing's College Learn national e-learning platform. The mandatory e-learning training required to be completed by officers is communicated during the induction process.</p> <p>Communications are sent to officers by the sponsors of the e-learning package to remind officers to complete refresher mandatory e-learning training.</p>	Assessment:	
		Design	✓
		Compliance	×
Findings / Implications	<p><u>Accuracy of e-learning course set up</u></p> <p>The requirements for officers to complete mandatory e-learning training is documented on the College of Policing's College Learn platform in a course catalogue, outlining the requirements for police constables (including specials) and police staff (including police community support officers (PCSOs)), and these have been defined in the back office function of the system. 15 packages are mandated for officers, 14 of which also include specials, and 13 of which are mandated for PCSOs. Five of the 15 courses require refreshers.</p> <ul style="list-style-type: none">• We reviewed the College Learn platform to determine whether courses were accurately set up, and noted:The Emergency Procedures training was released in May 2023 as a nationally mandated requirement and should be completed every three years. However, the College Learn system does not have this recorded as requiring a refresher.• The Emergency Procedures and the Initial and Specialist Operational Response (IOR / SOR) Chemical Biological Radiological and Nuclear (CBRN) e-learning is mandatory for teams, such as, the Incident Response Team. However, the College Learn system is set up for all officers, PCSOs and specials to complete the training. <p>Where mandatory training and refresher requirements are not accurately allocated, there is a risk officers may not undertake the required e-learning and may not be trained on key aspects of their role.</p> <p><u>Informing officers of e-learning requirements</u></p> <p>All officers are informed of mandatory e-learning requirements at induction, and once a new starter is set up on the Oracle system, a notification is sent to the Digital Learning and Design Team for them to be added to College Learn. Once this account has been set up, the Digital Learning and Design Team will send the officer an email (template email) introducing them to the College Learn platform. The welcome email states that for mandatory training, officers should be guided by their course tutors on which courses to complete, and does not outline specific mandatory training requirements. It is also the responsibility of training sponsors for e-learning packages to send communications to officers outlining the requirements to complete the mandatory training course. We obtained an example communication on behalf of the Head of DSE to remind officers to complete the Managing Information e-learning.</p> <p>However, our review identified that the welcome email itself does not clearly inform officers that they can access the course catalogue to identify what e-learning packages are mandatory for their role. Where this is not clearly signposted on the welcome email, there is a risk that officers are not aware of the course catalogue available on College Learn and consequently, training may be missed, which could lead to officers being uninformed of key responsibilities.</p>		

Area: Mandatory e-learning set up

Management Action 3	The Force will review College Learn to ensure the requirements to complete refresher e-learning are accurately set and assigned to the correct groups.	Responsible Owner: Learning and Development Manager	Date: 31 October 2023	Priority: Low
Management Action 4	The welcome email sent to officers once a College Learn account is created, will be updated to clearly signpost officers to the course catalogue on College Learn, which details the e-learning training that is mandated to officers and any requirements to refresh mandatory e-learning training.	Responsible Owner: Learning and Development Manager	Date: 31 October 2023	Priority: Low

Area: In-person training set up

Control	The requirement for officers to complete and refresh mandatory in-person training has been defined on the PowerBI dashboard. Supervisors are responsible for communicating the requirement for officers to complete and refresh mandatory in-person training.	Assessment:		
		Design		✓
		Compliance		×
Findings / Implications	<p>Supervisors are responsible for informing officers of what in-person training is mandatory and any refresher requirements in place as part of the induction process. The Digital Learning Designer outlined that the PowerBI dashboard held on the intranet is accessible to all officers, and officers can enter their collar number to identify what training is mandatory to them, which includes first aid and personal safety training.</p> <p>However, the dashboard does not include driver training. In 2020, driver training refresher requirements changed from every three years to every five, therefore the Oracle system currently flags training completed in 2019 as expired, for example, when under new refresher requirements, it would not expire until 2024. This would mean that if the data was currently published in the dashboard, it would not appear accurate. The Head of Learning and Development explained driver training requires a more sophisticated system than the dashboard, and the Force is reviewing its current system, Mercury, with a plan to use this system to record driving training instead and report on compliance.</p> <p>As the dashboard does not currently included driver training, supervisors and officers may be unaware of required expiry dates to ensure that driver training is refreshed, as required. In addition, where the dashboard is not used for driver training, there is no efficient monitoring tool for driver training compliance. Our sample testing below under 'in-person training completion' has identified four cases where officers had not completed a refresher of advanced training, and this finding has been incorporated within the below medium priority management action. The roles for the four exceptions were Dog Handler Constable, Special Constable, Complaints and Discipline Constable and HIU Constable. Further discussions with the Head of Learning and Development explained that only the Dog Handler Constable requires in date advanced driver training, as the other individuals have moved roles within Force, therefore no longer require the advanced training. Without appropriate mechanisms in place to monitor completion of driver training, there is a risk that officers could drive a police vehicle with blue tights and unknowingly have expired training.</p>			
Management Action 5	<p>The Force will introduce a mechanism to monitor driver training compliance for officers so that officers and supervisors have access to accurate training expiry information so driving training refresher requirements are known.</p> <p>The Force will review the controls in place to prevent officers without an appropriate level of driver training being able to drive certain police vehicles, e.g. a vehicle with blue lights. (See findings 'in-person training completion' below).</p>	Responsible Owner:	Date:	Priority:
		Learning and Development	30 April 2024	Medium

Area: New starter training compliance (in-person)

Control	<p>Officers are required to complete three mandatory in-person training courses: first aid, personal safety and driver training.</p> <p>Supervisors are responsible for informing the TA Team of officers requiring in-person training courses. The TA Team inform the RMU who is responsible for allocating and scheduling officers to the training courses and record this on the DMS.</p> <p>For initial basic driver assessment training, this is booked by the Driver Training Team (part of the Learning and Development Team) following a request from an officer's supervisor.</p>	<p>Assessment:</p> <p>Design ✓</p> <p>Compliance ×</p>
Findings / Implications	<p><u>First aid training</u></p> <p>For a sample of 10 new starters (five officers and five specials), the records on the Oracle system confirmed nine officers had completed first aid training. The final case related to the Assistant Chief Constable (ACC) who had transferred to the Force in March 2023. First aid training had not been completed by the ACC, and the Force was yet to receive the training record history from the previous force. In cases where an officer transfers from another force, the Recruitment Team requests the learning history and provides this to the TA Team. The information is recorded on Oracle with dates assigned. The Head of Learning and Development however informed us that obtaining training records from another force for transferees is a reoccurring challenge. Although we did note that in the case of the ACC, they may choose to not undertake all training as they are not operational.</p> <p>However, where mandatory training records are not on file, there is risk that officers are not well equipped to safely and effectively carry out their duties.</p> <p><u>Personal safety training</u></p> <p>For seven of the 10 new starters, personal safety training had been completed and recorded on Oracle. In two further cases (both specials), the training had not yet been completed, although one special had not been deployed and resigned in April 2023. In the second case, the Assistant Chief Officer Special Constabulary informed us the special had not yet been deployed and was still completing initial training.</p> <p>The final case related to the ACC (as above), whose records had not yet been received from the previous force.</p> <p><u>Driver training</u></p> <p>In four cases, the initial basic driver training was completed. In another case, relating to the special who resigned in April 2023 (as above), training had not been completed. There was also no record to confirm the ACC had completed driver training, for the reasons mentioned above. In the final four cases (all relating to specials), no driver training was completed. We understand that specials are not prioritised for driver training as the Force prioritises neighbourhood response and incident response drivers.</p>	

Area: New starter training compliance (in-person)

Management Action 6	<p>The Force will ensure learning records for officers transferring from another force are obtained within a reasonable timeframe and recorded on Oracle.</p> <p>Where learning records are not obtained from the previous Force within an agreed timeframe, the officer will undertake mandatory training as required by the Force.</p>	Responsible Owner: Recruitment Manager and supervisors.	Date: 31 October 2023	Priority: Low
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Area: Scheduling of in-person training

Control	The date officers are booked to attend in-person training (initial training courses and refresher training courses) is recorded on the Oracle system. This then triggers an automated mail flow which informs officers via email when the training is first booked. The Oracle system will also automatically send officers an email to remind them of upcoming training six weeks and seven days prior to the scheduled training date. Initial basic driver assessment training is booked by the Driver Training Team. The Driver Training Team informs the officer that they have been booked on the initial basic driver assessment.	Assessment:		
		Design	✓	
		Compliance	×	
Findings / Implications	The Training Coordinator showed us an example of training booked and recorded on Oracle, and how this triggers a reminder email to the individual providing detail of the training. Oracle automatically issues reminders six weeks and seven days prior to the scheduled training date. The RMU books officers on initial training courses for first aid and personal safety, and this is reflected on the DMS (duty management system) which supervisors have access to and officers can view in rotas. Since 19 June 2023, the Training Administration (TA) Team has started sending weekly emails to the Chief Inspectors and Superintendents to flag any officer non-attendance at booked training courses. Officers are then booked on the following week. However, driver training is booked by the Driver Training Team and bookings are not recorded on Oracle or the DMS. Once booked onto training, the officer is informed via email and this process is manually completed. Where the process is not automated and driver training is not reflected on the Oracle or DMS, there is a risk that the Force may not be effectively managing driver training bookings to maximise attendance rates.			
Management Action 7	The Driver Training Team will ensure that the Training Administration (TA) Team is informed of officers booked to attend the initial basic driver assessment training. The date the officer is booked to attend the training will be recorded on the Oracle system by the TA Team to ensure officers receive automated emails to inform and remind them of upcoming training.	Responsible Owner: Learning and Development Co-ordination Manager RMU	Date: 31 December 2023	Priority: Low

Area: In-person training completion

Control	Once in-person training is completed, the TA Team receives an attendance report and records attendance on the Oracle system, with an expiry date allocated based on agreed refresher dates. The RMU books officers requiring refreshers for first aid and personal safety training using the expiry dates on Oracle. Supervisors are required to inform the TA Team of officers requiring driver training refreshers.	Assessment: Design ✓ Compliance ×
Findings / Implications	<p>The RMU is responsible for booking officers onto first aid and personal safety refresher training; however, the RMU does not currently have direct access to Oracle to run reports to facilitate this process. The RMU therefore relies on the TA Team providing reports on training expiry, although we were informed these are not always issued in a timely manner. The Duty Planners within RMU therefore have collated manual records to support with training expiry using their own spreadsheets, meaning the Force may not be efficiently using system-generated reporting to support refresher training. Using the spreadsheets, Duty Planners book officers onto the two courses and inform the TA Team so Oracle is updated.</p> <p>We selected five officers and five specials and noted the following from training records:</p> <p><u>First aid training</u></p> <p>Seven of the 10 cases, first aid training was refreshed in the last 12 months. In three cases relating to an officer, first aid training had been completed over 12 months and therefore expired. The dates of last training attendance were May 2006, March 2014 (booked to attend in April 2016, but no attendance) and May 2021 (booked to attend in January 2023, but no attendance). We noted that the one officer where training was last completed in 2014 has been on restrictive duties since 2020.</p> <p><u>Personal safety training</u></p> <p>In seven cases, personal safety training was completed in the last 12 months. In the remaining three cases relating to officers, training had been completed over 12 months ago and therefore expired. The dates of last training attendance were January 2015 (booked to attend in January 2021, but no attendance), March 2022 (awaiting training place to become available), and September 2019 (officer on restricted duties).</p> <p>Where mandatory training has not been completed in accordance with refresher requirements, there is a risk that officers are not adequately trained to carry out duties, which could risk their own safety or the safety of the public.</p> <p><u>Driver training</u></p> <p>In six cases, driver training had been completed and was in date. In the remaining four cases, the standard or advanced driver training had expired. To note, initial basic driver training does not require refresher and the three officers and one special had completed initial training, meaning the officers and special can drive a police vehicle without blue lights. The Driver Training Manager informed us the role of the three officers and one special would not require standard or advanced driver training. However, the standard or advanced training for these four had expired in February 2012, September 2016, February 2020 and May 2023. The role of the officers were Dog Handler Constable, Special Constable, Complaints and Discipline Constable and HIU Constable. We asked the Force what controls are in place to prevent an officer without the required training driving a vehicle with blue lights, and we were informed that it is the responsibility of the line</p>	

Area: In-person training completion

manager and individual to ensure that they do not drive with blue lights. However, as raised under management action five, the Force does not currently publish driver training compliance figures on the PowerBI dashboard, which risks line managers and officers being unaware of training expiry, which could lead to unauthorised individuals driving vehicles with blue lights and could therefore risk the safety of the officer or the public.

We used data analysis to support our findings, and analysed compliance reports for mandatory training on the Oracle system to provide compliance results on the complete population within Oracle; the results of which are documented under Appendix A of this report and strengthen our conclusions. In addition, the report information from Oracle only shows those who have ever completed the training however, and it should therefore be noted that the training compliance may indeed be lower than the documented percentages outlined under Appendix A.

Management Action *See management action five.*

Management Action 8	The RMU will utilise the PowerBI dashboard to export data which details the expiry dates for first aid and personal safety training to identify officers requiring refresher training and book officers onto refresher training courses.	Responsible Owner: Inspector RMU	Date: Implemented – process in place since audit.	Priority: Medium
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Area: Monitoring attendance

Control	Once the training is completed, the TA Team receives an attendance report. The TA Team records attendance and non-attendance on the Oracle system. Where the training was not attended by an officer and this is recorded on the Oracle system, this triggers an automated mail flow which informs the officers and their supervisor of non-attendance. The officer is required to respond to the email stating the reason for non attendance.	Assessment:		
		Design		✓
		Compliance		×
	Non-attendance to in-person training is reported to the Chief Inspectors and Superintendents on a weekly basis.			
Findings / Implications	The Training Coordinator provided an example in which they booked themselves onto training through Oracle and recorded non-attendance at the training. The Training Coordinator then received an automated email to notify them of non-attendance. The officer must provide the reason for non-attendance in response to the email. However, this does not trigger an email to be sent to the officer's supervisor informing them of the non-attendance and the Force is reviewing the system to understand the cause of this. Where supervisors are not informed of non-attendance, there is a risk this may go unaddressed and corrective action may not be taken for repeat occurrences.			
	Chief Inspectors and Superintendents now receive a weekly email from the TA Team to inform them of any officer non-attendance recorded on Oracle, and we obtained examples from June and July 2023. This process was implemented recently as the Force has identified non-attendance at mandatory training as a reoccurring issue.			
	The draft Learning and Development Procedure does outline an escalation process in relation to non-attendance. It states that non-attendance will be reported to the relevant line manager who will meet with the individual and the Chief Inspector will update the TA Team on the reason for non-attendance. This procedure is in draft and yet to be implemented.			
Management Action 9	The Force will review the Oracle system to ensure non-attendance at training triggers an automated email to the relevant officer's supervisor to inform them of non-attendance.	Responsible Owner: Head of Business Support	Date: 30 April 2024	Priority: Low

Area: E-learning completion

Control	Officers are responsible for ensuring mandatory e-learning training is completed and refreshed where required. Mandatory e-learning courses are completed and recorded on the College Learn platform.	Assessment:
		Design ✓
		Compliance ×

Findings / Implications From the 15 mandated e-learning packages, we selected a sample of 10 packages to confirm these had been completed and refreshed (where required) by our sample of 10 new starters and 10 officers. Below we have outlined how many of the sample were required to complete each training, and from that total how many had completed the training, including the percentage:

Training course	Total required	Total completed (%)
Emergency Procedures	11	4 (36%)
Unconscious Bias	20	2 (10%)
Operation Plato	20	8 (40%)
Abuse of Position for Sexual Purpose	20	16 (80%)
Victims' Code	20	12 (60%)
Act Your Vital Role	20	9 (45%)
National Union of Journalist (NUJ) Public Press Order and Police	20	8 (40%)
Public Order Core Themes	20	8 (40%)
Managing Information (Operational)	20	11 (55%)
Introduction to Government Security Classification	20	13 (65%)

Our testing demonstrates non-compliance with undertaking mandatory e-learning training. The Digital Learning Designer stated that the Force does not have a learning management system, and whilst the College Learn platform is used for mandatory e-learning, it does not include a bespoke profile for each individual on what e-learning should be completed. This would require a heavily manual process whereby each individual profile is reviewed and allocated specific learning packages, which the Force does not have resource to complete. The platform does not issue email notifications to remind officers to complete the training as this is not assigned to direct accounts. For this reason, the Force relies on officers taking responsibility to complete mandatory e-learning and supervisors ensuring oversight through performance review meetings, or similar.

Area: E-learning completion

The Force uses the PowerBI dashboard to support training compliance, which is accessible to all officers and can be drilled down at an individual level. The 15 mandated e-learning packages are included on the dashboard.

We have used data analysis as part of our review to analyse complete training compliance rates, the results of which are documented under Appendix A and support these findings.

The Head of Learning and Development further outlined that courses assigned as mandatory e-learning are selected by the Force and work will be undertaken to determine what courses should be mandated. However, given that current compliance rates are particularly low, evidenced through our sample testing and data analysis, a high priority action has been agreed.

Management Action 10	The Force will issue a communication outlining the mandatory e-learning packages to all officers, and outline the requirements for completing the packages. The responsibility for ensuring officers complete the training will be communicated to supervisors.	Responsible Owner: Learning and Development Manager	Date: 31 October 2023	Priority: Low
Management Action 11	The Force will review the e-learning training compliance reports from College Learn to identify officers who have not completed mandatory e-learning training, including refresher e-learning training. This information will be cascaded to the relevant teams and supervisors for actioning. The Force will assign responsibility to the relevant group or team to provide central oversight of the above to ensure actions are taken to address mandatory e-learning training.	Responsible Owner: Chief Inspector Learning and Development All Force Chief Inspectors	Date: 31 January 2024	Priority: High

Area: Quality of training

Control	<p>Personal safety and driver training is delivered internally by the Force. The quality of personal safety and driver training is assessed via evaluation forms completed by attendees of the training session.</p> <p>First aid is delivered by an external training provider and the Force undertakes observation of delivery to ensure the quality of training. Attendees of first aid training are requested by the training provider to provide feedback by completing a candidate feedback form.</p> <p>Partially missing control</p> <p>The Force does not currently have a process in place to monitor the quality of mandatory e-learning training and report on officer satisfaction with e-learning training to address areas for improvement.</p>	<p>Assessment:</p> <p>Design ×</p> <p>Compliance -</p>
Findings / Implications	<p><u>Driver training and personal safety training</u></p> <p>Discussions with the Learning and Development Manager and the Training Co-ordinator confirmed after the completion of training, individuals are emailed an evaluation form to be completed. The evaluation forms are created and completed using Microsoft Forms. We reviewed examples of the evaluation forms sent to officers which record whether the trainer regularly checked understanding, whether aims and the objectives of the course were explained, a trainer satisfaction score and a course satisfaction score. If the score is seven or below, or a respondent has provided a negative response, this triggers an email to the trainer and business area manager.</p> <p>Internal observations are undertaken for both training courses. The Driver Training Manager provided an example of the plan in place to undertake observations. Observation outcomes are recorded on an internal quality assurance form, which records the outcomes of assessment and any actions needed.</p> <p>The Learning and Development Manager who manages the delivery of personal safety training confirmed that they are yet to establish and implement a schedule for the Force's personal safety trainers to undertake peer observations. Where peer observations are not undertaken for personal safety training, there is a risk that the Force does not effectively monitor the quality of its training to ensure it is adequate and meets the objectives the training intends to achieve.</p> <p><u>First aid training</u></p> <p>First aid training is delivered by an external training provider. The Learning and Development Co-ordination Manager last undertook an observation of first aid training on 8 December 2021 and review of the report produced confirmed they were happy with the level of tuition. However, the training delivery has not been reviewed since, meaning the Force risks any quality issues not being identified and addressed with the training provider. Although, we note that candidate feedback forms are completed by officers attending first aid and where improvements are identified, these are discussed with the external training provider.</p> <p><u>E-learning</u></p> <p>The Force does not currently have a process in place to monitor the quality of e-learning training through obtaining feedback and evaluations from officers. This is an area that the Force is planning to develop to ensure feedback and evaluation is provided by officers.</p>	

Area: Quality of training

Although, we note that the Digital Learning and Design Team do request all sponsors or subject matter experts to review e-learning packages on an annual basis, and evidence dated September 2022 demonstrated this.

Where officers are not asked to review e-learning completed, there is a risk that feedback on e-learning training may not be received or findings addressed.

Management Action 12	The Force will ensure a plan for undertaking peer reviews for personal safety training is produced and that observations are undertaken in line with the plan.	Responsible Owner: Learning and Development Manager	Date: 31 December 2023	Priority: Low
Management Action 13	The Force will ensure observations are undertaken of first aid training provided to officers on a cyclical basis to ensure quality of training is monitored and areas for improvement are addressed.	Responsible Owner: Learning and Development Co-ordination Manager	Date: 31 December 2023	Priority: Low
Management Action 14	The Force will consider its approach to obtaining feedback and evaluating the effectiveness of courses through the e-learning system, noting that the Force cannot affect changes to College Learn packages.	Responsible Owner: Learning and Development Manager	Date: 31 December 2023	Priority: Medium

Area: Reporting

Control	Partially missing control	Assessment:		
	The Force reports on the compliance of mandatory e-learning training to the People and Wellbeing Assurance Board every two months.	Design		×
	The Force does not yet report on the compliance of mandatory in-person training to the People and Wellbeing Assurance Board on a regular basis.	Compliance		-
Findings / Implications	<p>The People and Wellbeing Assurance Board meetings are not minuted. Instead, the Force maintains an action and decision log for the People and Wellbeing Assurance Board meeting. The Head of Learning and Development informed us that meetings are held on a monthly basis, although these alternate between the People and Wellbeing Assurance Board performance meetings and general meetings. Compliance with e-learning training is considered as part of the performance meetings using PowerBI dashboard data. We confirmed these updates through review of previous agendas and received evidence of a presentation delivered in January 2023. However, the People and Wellbeing Assurance Board has not received an update on mandatory e-learning since January 2023 as the Force is in the process of reviewing its governance arrangements. An annual learning and development performance update was presented by the Inspector Learning and Development in March 2023. The presentation detailed the number of requests for driver, first aid and personal safety training on the TNA, places offered, taken and the remaining places available. However, the presentation did not cover mandatory training compliance, for either in-person sessions or e-learning. We were informed in-person training compliance rates are not currently reported.</p> <p>Where compliance with mandatory in-person and e-learning training is not reported through the Force's governance structure on an agreed frequency, there is a risk that there is no central oversight to ensure actions in relation to mandatory training are driven within the Force to improve compliance rates.</p>			
Management Action 15	The Force will ensure compliance of mandatory e-learning and in-person training is reported on a routine basis through the relevant governance arrangements, and ensure any instances of non-compliance are addressed and monitored.	Responsible Owner: Learning and Development Co-ordination Manager	Date: 31 January 2024	Priority: Medium

APPENDIX A: DATA ANALYTICS

The following is a summary of findings from our analytical work which we have discussed with management.

Mandatory in-person training

We obtained a report from Oracle which detailed the number of officers including specials with expired first aid, personal safety, and driver training. The report also identified where this training was in date. The results of our testing have been summarised in the table below.

Training course	Refresher requirements	Number of officers on Oracle report	Percentage of officers recorded on Oracle with valid training completed	Number of officers with valid training recorded on Oracle	Number of officers with out of date training recorded on Oracle
First Aid Training	Annually	1480	70.61%	1045	435
Personal Safety Training	Annually	1370	65.91%	903	467
Driver Training	Initial basic driver assessment does not require refresher training. Standard and Advanced driver training is refreshed on a five yearly basis.	958	65.55%	628	330

It was noted that the reports from Oracle only list officers who have undertaken training and not officers who have never undertaken first aid, personal safety, or driver training. This has been a limitation in our analysis, and therefore the number of officers with valid training could indeed be lower than reported above.

Mandatory e-learning training

We focused our review of the e-learning training that is mandatory to PCSOs, officers and specials. The Force mandates 15 e-learning packages to officers, 14 of which are also mandated to specials and 13 of which are mandated to PCSOs. Six of the 15 e-learning packages require refresher training. It was noted that one of the 15 e-learning packages named 'Pre-Course Personal Safety Training' encompasses six separate e-learning training courses. We undertook full population testing using a e-learning report generated from College Learn to confirm the percentage of roles complying with mandatory e-learning training including refresher requirements. We also compared the compliance rates identified through our analysis to the compliance rates reported on the PowerBI dashboard for PCSOs, officers and specials. It was noted that the PowerBI excludes roles on suspension, long term sickness absence and on long term leave. The results of our testing have been summarised in the table below.

E-learning training package	Mandatory for Police Constables ?	Mandatory for Specials?	Mandatory for PCSOs?	Refresher requirements	Percentage of officers recorded on the PowerBI dashboard with valid training completed	Percentage of officers recorded on College Learn with valid training completed	Variance between the compliance recorded on College Learn and the PowerBI Dashboard
Introduction to Government Security Classification	✓	✓	✓	Two yearly	81%	80%	-2%
Unconscious Bias (TSAB)	✓	✓	✓	N/A	38%	37%	-1%
Initial and Specialist Operational Response (IOR/ SOR) Chemical Biological Radiological and Nuclear (CBRN)	✓	✓	✓	N/A	32%	27%	-5%
Emergency Procedures	✓	✓	✓	Three yearly	54%	48%	-6%
Mental Health and The Police	✓	✓	✓	N/A	85%	84%	-1%
Operation PLATO video	✓	✓	✓	N/A	73%	71%	-2%
Abuse of Position for Sexual Purpose	✓	✓	✓	N/A	93%	93%	-1%
NCRS National Crime Recording Standard	✓	✓	✓	N/A	82%	81%	-1%
Victims' Code	✓	✓	✓	N/A	94%	94%	-1%
Kidnap and Extortion	✓	x	✓	N/A	85%	85%	0%
ACT - Your Vital role	✓	✓	✓	N/A	90%	89%	0%
NUJ Public Order Press and Police	✓	✓	x	Three yearly	76%	74%	-2%
Public Order Core Themes	✓	✓	x	Three yearly	67%	65%	-2%

E-learning training package	Mandatory for Police Constables ?	Mandatory for Specialists?	Mandatory for PCSOs?	Refresher requirements	Percentage of officers recorded on the PowerBI dashboard with valid training completed	Percentage of officers recorded on College Learn with valid training completed	Variance between the compliance recorded on College Learn and the PowerBI Dashboard
Managing Information - Operational	✓	✓	✓	Two yearly	58%	64%	6%
<u>Pre-Course Personal Safety Training eLearning:</u> Medical Survey	✓	✓	✓	Annually	49%	48%	-1%
Acid and Corrosive	✓	✓	✓	Annually	69%	7%	-62%
Spit and Bite Guards	✓	✓	✓	Annually	20%	22%	2%
Water Safety	✓	✓	✓	Annually	23%	22%	-1%
Stop and Search	✓	✓	✓	Annually	24%	24%	0%
National decision model Knowledge Check	✓	✓	✓	Annually	14%	16%	2%

Our review found the following exceptions where the variance between our analysis and PowerBI was greater than 2%:

- Acid and Corrosive e-learning is video content completed on an annual basis as part of the Pre Personal Safety Training e-learning. The Digital Learning Designer highlighted that the College Learn report does not track re-completion of watching e-learning content delivered over video. As a result, the 7% compliance rate is the number of individuals who have first watched the video in the last 12 months. The e-learning report does not identify users who have re-watched the video and only record their initial completion date. The Digital Learning Designer confirmed that the College of Policing are aware of this and are currently working to correct this system error. In the meantime, the Force uses the first date the training was completed to inform the compliance rate recorded on the PowerBI dashboard. As a result, the PowerBI dashboard reports a compliance rate of 69%.
- In the remaining three cases (Managing Information – Operational, Initial and Specialist Operational Response (IOR/ SOR) Chemical Biological Radiological and Nuclear (CBRN) and Emergency Procedures), the Senior Performance Analyst confirmed the variance is due to the PowerBI dashboard excluding individuals on suspension, long term leave and sickness absence.

Excluding the compliance rate reported for the Acid and Corrosive e-learning for reason noted above, we noted an average compliance rate of 59% across mandated e-learning training. As identified by our review, compliance of mandatory training both in-person and e-learning is not formally and frequently reported across the Force to ensure issues are resolved and actions are taken.

APPENDIX B: 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.

Area	Control design not effective*	Non Compliance with controls*	Agreed actions		
			Low	Medium	High
HR: Training	3 (17)	8** (17)	10	4	1
Total			10	4	1

* 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.

** More than one action raised against one control.

Debrief held	11 July 2023
Draft report issued	2 August 2023
Revised draft reports issued	12 September 2023
	13 September 2023
Responses received	29 September 2023
Final report issued	29 September 2023

Internal audit Contacts	Dan Harris, Head of Internal Audit
	Philip Church, Senior Manager
	Hollie Adams, Assistant Manager
	Rajan Takhar, Senior Auditor

Client sponsor	Director People and Development
	Head of Learning and Development
	DCI, Learning and Development

Distribution	Director People and Development
	Head of Learning and Development
	DCI, Learning and Development

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We thank you again for working with us.

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