



THE POLICE AND CRIME COMMISSIONER FOR CLEVELAND AND THE CHIEF CONSTABLE OF CLEVELAND

[Follow Up of Previous Internal Audit Management Actions: Visit 2](#)

Internal audit report 12.23/24

FINAL

12 February 2024

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

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

1. EXECUTIVE SUMMARY

Background

As part of the approved internal audit plan for 2023/24, we have undertaken a review to follow up on the progress made to implement the previously agreed management actions in respect of the following internal audit reports completed by RSM:

- Integrated Offender Management (16.21/22);
- Cyber Security Review (3.22/23);
- General Data Protection Regulation (GDPR) (7.22/23);
- De-Collaboration: Cleveland and Durham Special Operations Unit (CDSOU) (12.22/23);
- Criminal Disclosure (13.22/23);
- Overtime (1.23/24);
- HR: Training (2.23/24);
- Sickness Absence (3.23/24);
- Vetting (6.23/24); and
- Data Quality – Monitor and Audit Compliance Against NCRS and HOCR (10.23/24).

The Force has reported a total of 27 management actions as complete from the above reports, comprising of three high, nine medium, and 15 low priority management actions. We note one of the three high priority actions had been split by the Force, and we followed up on the other part of this action during our follow up visit one of 2023/24.

Conclusion

We were provided with satisfactory evidence in respect of 26 management actions and therefore have agreed that these actions had been fully implemented (23) or superseded (3). In respect of **one medium priority** management action, based on our discussions with action owners and the support provided, we have considered the implementation of this action to be ongoing, but have revised the action to **low priority** to reflect the progress made.

Taking account of the issues identified in the remainder of the report and in line with our definitions set out in Appendix A, in our opinion the Force has demonstrated **good progress** in implementing agreed management actions.

Progress on actions

The following table includes details of the status of each management action:

Implementation status by review	Number of actions agreed	Status of management actions				
		Impl. (1)	Impl. Ongoing (2)	Not impl. (3)	Superseded (4)	Completed or no longer necessary (1) + (4)
Low	15	13	0	0	2	15
Medium	9	7	1*	0	1	8
High	3	3	0	0	0	3
Total	27	23	1	0	3	26
	(100%)	(85%)	(4%)	(0%)	(11%)	(96%)

* re-prioritised to low priority to reflect progress made.

2 FINDINGS AND MANAGEMENT ACTIONS

Status	Detail
1	The entire action has been fully implemented.
2	The action has been partly though not yet fully implemented.
3	The action has not been implemented.
4	The action has been superseded and is no longer applicable.
5	The action is not yet due.

Assignment: HR Training (2.23/24)

Original management action / priority	<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.</p> <p>Priority: Medium</p>
--	---

Audit finding / status	<p>The Force informed us that driver training compliance is monitored by the Driver Training Manager who will email line managers to advise them of the upcoming expiry of driver training. Managers are responsible for reviewing their areas and individuals are responsible for booking themselves onto courses. If driver training expires, individuals are still able to drive police vehicles with their basic training and normal license; however, cannot carry out blue light activity.</p> <p>We evidenced a copy of an email sent by the Driver Training Manager showing permit expirations within the next 120 days. The table shows the due date, organisation, driver grade, collar name and details.</p> <p>We met with the Learning and Development Co-ordination Manager to discuss the review of controls in place and any changes made. The Force has not implemented further controls, as line managers should be aware of which officers have received blue light training, and through the reports should be aware of when officer training is due to expire. Additionally, driver training is reported to the Chief Officer Team on a quarterly basis to show progress against quarterly targets of 60% of neighbourhood officers and 80% of response officers to be trained and authorised. This monitoring provides oversight and further highlights any instances where training has expired.</p> <p>Although a notification has been put in place to advise line managers when driver training is to expire, the Force has not implemented a control to ensure that this is followed up, and when training expires there is something to ensure that officers are not carrying out blue light activity. We would suggest the Driver Training Manager sends a further report as training expires showing those who have not been booked onto a course and action has not been taken since the email report advising of upcoming expiry is sent to ensure it is explicit that these officers would not be permitted to drive a vehicle with blue lights. There is a risk that officers could drive police vehicles with blue lights and unknowingly have expired training.</p> <p>To reflect that the Force has introduced reporting, we have revised the priority of the action to low priority.</p>
-------------------------------	--

Assignment: HR Training (2.23/24)**2: The action has been partly, although not yet fully implemented.**

Management Action 1	The Driver Training Manager will send subsequent reminders to line managers if drivers are not booked onto courses and the training has expired to remind officers not to drive vehicles with blue lights (and that officers are not carrying out blue light activity without the correct training).	Responsible Owner: Learning and Development Coordinator	Date: 30 June 2024	Priority: Low
----------------------------	--	---	------------------------------	--------------------------------

APPENDIX A: DEFINITIONS FOR PROGRESS MADE

The following opinions are given on the progress made in implementing actions. This opinion relates solely to the implementation of those actions followed up and does not reflect an opinion on the entire control environment.

Progress in implementing actions	Overall number of actions fully implemented	Consideration of high priority actions	Consideration of medium priority actions	Consideration of low priority actions
Good	75% +	None outstanding.	None outstanding.	All low actions outstanding are in the process of being implemented.
Reasonable	51 – 75%	None outstanding.	75% of medium actions made are in the process of being implemented.	75% of low actions made are in the process of being implemented.
Little	30 – 50%	All high actions outstanding are in the process of being implemented.	50% of medium actions made are in the process of being implemented.	50% of low actions made are in the process of being implemented.
Poor	< 30%	Unsatisfactory progress has been made to implement high priority actions.	Unsatisfactory progress has been made to implement medium actions.	Unsatisfactory progress has been made to implement low actions.

APPENDIX B: ACTIONS COMPLETED OR SUPERSEDED

From the testing conducted during this review we have found the following actions to have been fully implemented and superseded.

Assignment title	Management actions
Integrated Offender Management (16.21/22) Revised action: Follow Up: Visit 1 (4.23/24)	Implemented Revised action issued August 2023: The IOM working Group Terms of Reference will be updated on a regular basis in line with requirements. Priority: Low We note this action was marked as ongoing at our previous follow up review (August 2023). Based on confirmation that the terms of reference are included in a report from the Probation Service that has not been received from them yet, the priority of this action, and the evidence provided that the HMIC Liaison Officer had requested the updated report and followed up this request for over three months, we have agreed to mark this action as fully implemented. We additionally note that the Force is not able to hold the Probation Service to account, and the Force is not able to, themselves, update the Terms of Reference.
Cyber Security Review (3.22/23) Revised action: Follow Up: Visit 2 (11.22/23)	Implemented Revised action issued March 2023: Management will logically enforce stronger password requirements for privileged accounts. Priority: Medium
General Data Protection Regulations (7.22/23)	Implemented Upon appointment of the Information Governance Manager, there should be sufficient priority placed on the outstanding requirements outlined within the ICO Self-Assessment toolkit. Priority: Low
General Data Protection Regulations (7.22/23)	Implemented b). Upon the appointment of the Information Governance Manager, a full review of each asset owner area will be conducted to identify areas where consent is required. Following the area review, a development plan will be created to prioritise areas which require consent. Priority: High We noted that the full action agreed as part of our General Data Protection Regulations Review was split by the Force into two parts. We followed up on the first section of this action during our previous follow up review - Follow Up of Previous Internal Audit Management Actions Visit 1 (4.23/24). The second section of this action was considered fully implemented during this review.

Assignment title	Management actions
De-Collaborations (12.22/23)	<p>Implemented</p> <p>Following the Force-wide restructure, the Force will ensure all CPSOU reporting structures are defined to allow for effective decision making.</p> <p>Key decisions following the mass restructure, will be clearly documented, and communicated to staff to allow for authorisation and challenge, where appropriate.</p> <p>Priority: Low</p>
De-Collaborations (12.22/23)	<p>Implemented</p> <p>The Force will undertake analysis on the de-collaboration to identify benefits and weaknesses following the de-collaboration and report on the lessons learnt through the governance structure.</p> <p>Priority: Low</p>
Criminal Disclosure (13.22/23)	<p>Implemented</p> <p>The Leadership Team will communicate to all supervisors the importance of reviewing files and investigating officers the importance of lines of inquiry and the recording of them in the IMD, MG5/MG6.</p> <p>Priority: High</p>
Overtime (1.23/24)	<p>Implemented</p> <p>The Oracle System Administrator Team will ensure multiple recalls to duty are processed manually on the payroll system.</p> <p>Priority: Low</p>
Overtime (1.23/24)	<p>Implemented</p> <p>Once police officers have been assigned to the correct command on Oracle, as per the restructure, the Force will ensure police officers who have worked over 32 hours over a four-week period are reported at each monthly Management Team meeting across the commands.</p> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Superseded</p> <p>The Force will review College Learn to ensure the requirements to complete refresher e-learning are accurately set and assigned to the correct groups.</p> <p>Priority: Low</p> <p>The Head of Learning and Development stated that the Force does not use the College Learn audience selection facility, and instead uses the learning governance to decide the mandatory packages that apply to officers, and compliance is reported through a PowerBI dashboard; officers are only shown the courses that are relevant to them as mandatory.</p>

Assignment title	Management actions
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Implemented</p> <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> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>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.</p> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>Priority: Medium</p>
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>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.</p> <p>Priority: High</p>

Assignment title	Management actions
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>Priority: Low</p>
HR Training (2.23/24)	<p>Implemented</p> <p>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.</p> <p>Priority: Medium</p>
HR Training (2.23/24)	<p>Superseded</p> <p>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.</p> <p>Priority: Medium</p> <p>The Head of Learning and Development informed us that the Force cannot evaluate College Learn products themselves through the system but can provide feedback and withdraw a package if they receive information that it is not useful or working for staff or officers. We note that whilst the Force has considered their approach to obtaining feedback and evaluating courses, as these are provided through College Learn, the Force has opted not to change its approach and implement a further process to obtain feedback. E-learning courses would be considered on an ad-hoc basis, should internal feedback be provided to indicate a lack of effectiveness or irrelevant content. As the Force has decided not to change its approach, we have therefore superseded this action.</p>

Assignment title	Management actions
Sickness Absence (3.23/24)	<p>Superseded</p> <p>Upon receipt of pay appeals and decisions from the People and Development Team, the Payroll Team will store all communication electronically for additional security and allow easy accessibility for future audits.</p> <p>Priority: Low</p> <p>The Head of Payroll Services explained that the People Team send emails with instructions for any pay to be amended if a decision is made to override regulations based on the appeal decision; instructions are then filed in manual personal payroll files. All payroll processing work is currently completed manually.</p> <p>Whilst the Force would like to implement electronic filing within payroll, due to the cost of implementation, there is currently no agreed date that this will be implemented by. We have agreed to close this management action, due to the limiting factor being the cost of implementing an electronic system.</p>
Vetting (6.23/24)	<p>Implemented</p> <p>The Force will undertake a dip sampling exercise on cleared applicants to identify if there are consistent issues where supporting evidence has not been uploaded or retained on CoreVet as per the APP guidance.</p> <p>Priority: Medium</p>
Vetting (6.23/24)	<p>Implemented</p> <p>The Force Vetting Manager will instruct a volunteer vetting audit to be conducted in conjunction with the Citizens in Policing Coordinator to confirm that volunteers remain active and vetting clearance is still required. This audit will be kept under review and conducted at least annually to ensure regular review.</p> <p>Decisions in respect of vetting status will be made in line with the 're-joiners' section within the Code of Practice on Vetting. For any current volunteers, it is recommended that the Force attach evidence of identification to the CoreVet system to ensure adequate audit trail is retained.</p> <p>Priority: Medium</p>
Vetting (6.23/24)	<p>Implemented</p> <p>The Force will ensure audit evidence such as rationale is retained to confirm they have appropriately reviewed the access to the CoreVet system and confirmed the users are appropriate.</p> <p>Upon completion of the audits, evidence retained will be stored centrally.</p> <p>Priority: Medium</p>
Data Quality: Monitor and Audit Compliance Against	<p>Implemented</p> <p>The Force will consider the risk of transferred crimes and whether an appropriate review needs to be scheduled to ensure compliance with NCRS and HOCR.</p>

Assignment title	Management actions
NCRS and HOCR (10.23/24)	Priority: Low
Data Quality: Monitor and Audit Compliance Against NCRS and HOCR (10.23/24)	Implemented The Quality and Compliance Team will ensure they update the detailed feedback sheet within the audit workbook, to ensure there is an effective audit log of actions resolved to allow management to monitor the current rate of resolved actions. Priority: Medium

Debrief held	30 January 2023
Draft report issued	9 February 2024
Responses received	12 February 2024
Final report issued	12 February 2024

Internal audit contacts	Dan Harris, Partner and Head of Internal Audit Philip Church, Associate Director Hollie Adams, Assistant Manager Grace Kunzler, Lead Auditor
Client sponsor	HMIC Liaison Officer
Distribution	HMIC Liaison Officer

We are committed to delivering an excellent client experience every time we work with you. If you have any comments or suggestions on the quality of our service and would be happy to complete a short feedback questionnaire, please contact your RSM client manager or email admin.south.rm@rsmuk.com

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 **Police and Crime Commissioner for Cleveland and 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 UK 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 UK 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 UK 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.