



## **Report of the PCC CFO to the Chair and Members of the Joint Audit Committee**

**26 September 2024**

**Presenting Officer: Mr Michael Porter, Chief Finance Officer**

**Status: For information**

### **Internal Audit Recommendations Update Report – September 2024**

#### **1. Purpose**

- 1.1 The purpose of this report is to provide Members of the Cleveland Audit Committee with a status update in relation to the Office of the Police and Crime Commissioner (OPCC) recommendations following internal audit reviews.

#### **2. Recommendations**

- 2.1 It is recommended that Members note the content of the report.

#### **3. Background**

- 3.1 During 2023, as part of the internal audit plan the OPCC have been subject to two internal audits: namely **Commissioning** and **Police and Crime Plan**.
- 3.2 Both of these areas feature on the OPCC Strategic Risk Register, as a result the internal audits go a long way to supporting the management of and mitigation of risk.
- 3.3 Progress against the audit recommendations are discussed quarterly in internal governance meetings involving relevant OPCC team members. Quality assurance and accountability is further provided through the OPCC Senior Management Team Meetings – again on a quarterly basis.
- 3.4 In 2024 the OPCC was subject to one internal audit: Complaints. Although the actions had not been signed off at the time of writing this report, the actions have been included on the internal audit tracker for awareness.

#### **4. Progress**

- 4.1 The OPCC internal audit tracker includes 16 existing recommendations, of

these recommendations, 13 have been identified as complete by the OPCC and are highlighted as green on the action plan.

4.2 The remaining live actions continue to be progressed. As the Committee will be aware, a new PCC was elected in May 2024. The new police and crime plan is currently in development and will be presented to the Police and Crime Panel in November 2024, therefore the delivery date for actions 12,14 and 15 have been changed to reflect this.

4.3 All remaining live actions will continue to be progressed through the governance described above including report to Audit Committee members.

## **5. Implications**

### **5.1 Finance**

There are no financial implications arising from this report.

### **5.2 Diversity and Equal Opportunities**

There are no diversity or equal opportunities implications arising from the content of this report.

### **5.3 Human Rights Act**

There are no Human Rights Act implications arising from the content of this report.

### **5.4 Sustainability**

There are no sustainability implications arising from this report.

### **5.5 Risk**

Failure to deliver against the recommendations of the internal audits could significantly impact on the management of risk within the OPCC.

## **6. Conclusion**

6.1 As can be seen at appendix 1, significant effort has been ongoing to fulfil the recommendations agreed following internal audits. With a culture of continuous improvement, the continued implementation of all audit actions will go a long way to support the delivery of the PCCs statutory responsibilities and the management of any associated strategic risks.

Office of the Police and Crime Commissioner – Internal Audit Recommendations

Ref.	Report Date	Report title	Action	Priority	Original delivery date	Revised delivery date	Responsible Owner:	Action Update	Status
1	Mar 23	Commissioning	The OPCC will develop a commissioning policy outlining the process from start to finish. The policy will be made available to staff in a shared location.	Medium	30 September 2023	31 January 2024	Head of Policy, Partnerships and Delivery	<p>Document is in final stage of draft and will provide a broader structure and policy for all OPCC related commissioning activity (including procurement and grant funding).</p> <p>This document will be an essential toolkit for OPCC staff to utilise when leading and supporting any commissioning process. This will include processes for grant funding and formal procured contractual arrangements including ongoing performance, delivery, financial and risk management/ monitoring.</p> <p>As part of the development of this policy 1:1s have taken place with all OPCC staff involved in the commissioning process to set clear standards and consistency across team members.</p> <p>A final draft has been submitted to SMT and has been approved.</p>	complete
2	Mar 23	Commissioning	A declarations of interest process will be created to help identify potential conflicts of interest.	Low	31 December 2023		Head of Policy, Partnerships and Delivery	<p>Cleveland Police Head of Procurement is now in post.</p> <p>Meeting arranged between Head of Policy, Partnership and Delivery and Head of Procurement early December to ensure declarations of interest process is in place and utilised consistently across the OPCC / Cleveland Police.</p>	
3	Mar 23	Commissioning	<p>Where an organisation receiving funding is not set up correctly and no credit check details can be provided, additional due diligence and monitoring will be undertaken and the decision to continue with funding will be formally documented.</p> <p>Staff will also be reminded that checks should be undertaken before the grant agreement is signed and before the funding period begins.</p>	High	30 April 2023		Head of Policy, Partnerships and Delivery	<p>This process is in place and has been embedded across the team.</p> <p>Process for such situations is built into the commissioning document as described at point 1 above.</p> <p>Approval for such organisations described at point 3 require approval by the OPCC Chief Finance Officer prior to any arrangements being put in place with appropriate risk mitigation and risk management in place. Communications are saved on file for audit purposes.</p>	
4	Mar 23	Commissioning	Staff will be reminded of the requirement to ensure insurance documentation is obtained and this has been provided before the grant agreement is signed and before the funding period begins. All insurance documents will be obtained in a timely manner and this requirement will be enforced through the audit activity if a decision is made to restart it.	High	30 April 2023		Head of Policy, Partnerships and Delivery	<p>This process is in place and have been embedded across the team for all new contract / grants awarded. Like above this requirement will be clearly set out in the document referred to at point 1 above.</p> <p>To support the embedding across the team the importance of this recommendation has been stressed to the team on a number of occasions including at 1:1 meetings, during team meetings and quarterly Contract and Grant Management Overview</p>	

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								meetings which have recently been introduced and discussed further at point 10 below.	
5	Mar 23	Commissioning	A decision will be made on whether an audit activity will be restarted to provide additional oversight that appropriate documentation is on file (DRF, grant agreement, due diligence documents) and the commissioning process has been undertaken in the correct order. For example, checking to make sure due diligence has been undertaken after the DRF is signed but before the grant agreement has been signed before the funding period begins.	Medium	30 September 2023		Chief Finance Officer	The Chief Finance Officer has considered the reintroduction of the audit activity as described. However, given clear policy and procedures will be in place with robust quality assurance by the Head of Policy, Partnership and Delivery he is satisfied at this time the additional due diligence activity is not required.	
6	Mar 23	Commissioning	Minutes and / or action logs will be maintained and kept on file for all commissioned services.	High	30 April 2023		Head of Policy, Partnerships and Delivery	A template has been developed for the team to utilise in support of contract/grant performance meetings. Currently all contracts/grants are managed in the same way.  The commissioning document referred to at point 1 will provide some guidance in relation to proportionality so that the high value contracts can be managed more robustly.	
7	Mar 23	Commissioning	Staff will be reminded of the importance of performance reporting and ensuring this is reviewed and kept on file. If a provider fails to provide performance reports, this should be escalated within the OPCC.	Medium	1st April 2023		Head of Policy, Partnerships and Delivery	Please see updates at point 4 and 6.	
8	Mar 23	Commissioning	Authorisation limits will be added to the authorised signatories list.	Low	30 April 2023		Chief Finance Officer	This action has been complete.	
9	Mar 23	Commissioning	All grant agreements will be signed after the DRF has been signed by the Monitoring Officer and the Commissioner, and always before the funding period begins.	High	31 March 2023		Head of Policy, Partnerships and Delivery	As per updates above.	
10	Mar 23	Commissioning	An internal reporting process will be started highlighting all active partnerships, the total amount due, amount paid out and whether the organisation is delivering against requirements set out in the grant agreement.  An agreed frequency will be established, and consistent reporting provided to relevant staff members.  The reporting could also include reference to the Police and Crime Plan to make clear how commissioned services are delivering against the objectives highlighted within the Plan. This could also be used to feed into the annual report and future commissioning decisions.	Medium	31 March 2023		Head of Policy, Partnerships and Delivery	A quarterly grant / contract management overview and planning meeting has been introduced with a clear terms of reference outlining the purpose and importance of the meeting.  This meeting is Chaired by the Head of Policy, Partnership and Delivery. To support discussion at the meeting on a quarterly basis grant/contract managers are required to risk rate their grants/contracts for discussion in the meeting. A risk rating structure has been provided to encourage consistency in grading. The grading is based on service delivery, risk and finances. Those contracts identified as very high and high risk are	

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Ref.	Report Date	Report title	Action	Priority	Original delivery date	Revised delivery date	Responsible Owner:	Action Update	Status
								discussed in detail at the meeting with a point of escalation to OPCC Senior Management Team if required.	
11	October 2023	Police and Crime Plan	<p>The performance framework for 2023/23 will be completed and made available to staff within the OPCC and relevant individuals within the Force.</p> <p>This will include a list of individuals that are responsible for managing performance for each area or the source of the information and data</p>	Low	31 December 2023		Head of Policy, Partnerships and Delivery	<p>The performance framework for 2023/24 was completed in September 2023 and was used to provide a quarter 1 update to the Police and Crime Panel. It is likely this will continue to expand over time as our recording as an OPCC improves and the data becomes more reliable for us to report on.</p> <p>Quarter 1 performance and delivery report can be found <a href="#">here</a>. This report and information within it is discussed in the OPCC Police and Crime Plan Delivery and Performance Meeting to identify any issues, opportunities for development and where relevant to support scrutiny of the force.</p> <p>Responsibility for performance management sits with the Police and Crime Plan priority lead – this will be clearly displayed in the performance framework and improved upon further following the May elections.</p>	
12	October 2023	Police and Crime Plan	As part of the planning process for the next delivery plan and Police and Crime Plan, the OPCC should consider outlining measures and objectives for each deliverable to outline how the action will be achieved	Medium	31 July 2024	1 November 2024	Head of Policy, Partnerships and Delivery	A new PCC was elected in May 2024, the police and crime plan is currently in development and measures and objectives for each deliverable will be set with an outline of how the action will be achieved. The new plan will be presented to the Police and Crime Panel in November 2024 so the delivery date has been changed to reflect this.	Ongoing
13	October 2023	Police and Crime Plan	An action log or set of minutes should be retained for the meeting between the Head of Policy, Partnership and Delivery and the PCC.	Low	31 October 2023		Head of Policy, Partnerships and Delivery	This has been implemented from quarter 2 period onwards.	
14	October 2023	Police and Crime Plan	As part of the planning process for the next delivery plan and Police and Crime Plan, the OPCC will ensure a reference number is added to deliverables in the delivery plan that corresponds to a performance metric in the performance framework. Where it is not possible to monitor a deliverable, this should be clearly documented and the OPCC should continue to include updates to the action.	Medium	31 July 2024	1 November 2024	Head of Policy, Partnerships and Delivery	See item 12 above	Ongoing
15	October 2023	Police and Crime Plan	Each action will be given a 'target completion date', which should not be altered to reflect progress. Instead, the OPCC should document a separate column of 'revised end date' to ensure that any slippage is clearly recorded and evidenced.	Medium	31 July 2024	1 November 2024	Head of Policy, Partnerships and Delivery	See item 12 above	Ongoing
16	October 2023	Police and Crime Plan	Terms of reference will be created and approved for the expanded SMT meetings	Low	31 September 2023		Chief Executive	Terms of reference have been produced and approved by SMT.	

**Office of the Police and Crime Commissioner – Internal Audit Recommendations**

Ref.	Report Date	Report title	Action	Priority	Original delivery date	Revised delivery date	Responsible Owner:	Action Update	Status
17	August 2024	Complaints	Management will ensure that the SLA and SOP is reviewed and approved in line with the annual review requirement.	Low	30 July 2024		Head of Policy, Partnerships and Delivery	A meeting has been arranged between the OPCC and DSE to discuss this	Ongoing
18	August 2024	Complaints	The Complaints Resolution Team will be reminded of the requirement to ensure all complaints are acknowledged in writing as soon as possible, or within two working days of receipt.	Low	30 September 2024		Team Leader – Resolution Team	This will be delivered within the target date	Ongoing
19	August 2024	Complaints	The Complaints Resolution Team will be reminded of the requirement to ensure all complaints are fully documented via a policy log, and recorded on Centurion. We will also ensure that where complaints have been put on hold, these are revisited every six months to identify if the complaint can now be progressed.	Low	30 September 2024		Team Leader – Resolution Team	This will be delivered within the target date	Ongoing
20	August 2024	Complaints	A process will be implemented to ensure that complaint investigations are monitored for progression, and prioritised where this is not the case, allowing complaints to be updated within 28 days, where possible.	Low	30 September 2024		Team Leader – Resolution Team	This will be delivered within the target date	Ongoing
21	August 2024	Complaints	Consideration will be given to whether it would be beneficial to expand their customer feedback survey, to allow complainants who do not have email access to provide feedback.	Suggestion	N/A		N/A	This suggestion will form part of the team’s customer service accreditation work	Ongoing
22	August 2024	Complaints	A reporting and review mechanism will be implemented to allow for the customer feedback survey results to be collated, reviewed, and reported through a suitable governance structure, to allow for the effective identification and remediation of any dissatisfaction trends, where necessary.	Medium	31 December 2024		Team Leader – Resolution Team	This suggestion will form part of the team’s customer service accreditation work	Ongoing

	Identified by the OPCC as closed – awaiting RSM sign off.
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Office of the Police and Crime Commissioner – Internal Audit Recommendations

Report Title	Grading
Commissioning 2023	Minimal Assurance
Police and Crime Plan – October 2023	Reasonable Assurance

Colour coding

Status – RSM Definitions	
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.
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.
Low	There is scope for enhancing control or improving efficiency and quality.