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# **JOINT AUDIT COMMITTEE (JAC)**

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**Minutes from public  
meeting held on 22  
December 2021**

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**JOINT AUDIT COMMITTEE (JAC)  
PUBLIC MINUTES**

Notes of the meeting held on 22 December 2021 at 9:30am.  
This meeting was held virtually and broadcast live on YouTube

**Present:**

Sue Davis	:	Chair
Richard Hollands	:	Vice Chair
Cath Hannon	:	Board Member
Mark Kenyon	:	Chief Finance Officer – PCC
Lynn Joyce	:	Head of Internal Audit – PCC
Jonathan Jardine	:	Chief Executive – PCC
Gemma Brookes	:	Internal Audit - PCC
Parmila Dadra	:	Internal Audit - PCC
Vanessa Jardine	:	Deputy Chief Constable – WMP
Neil Chamberlain	:	Director of Commercial Services - WMP
Sam Ridding	:	Head of Professional Standards - WMP
Veronica Ejizu	:	Governance, Risk and Assurance Senior Manager - WMP
Harry Barton	:	Head of Strategy and Direction - WMP

<b>502</b>	<b>Item 1 - Apologies</b>  The Chair welcomed everyone to the meeting.  Apologies were received from Organisational Learning and Risk Manager Rachel Jones-Burns and Board Members Charmaine Burton and Bhupinder Gakhal.
<b>503</b>	<b>Item 2 - Declarations of Interest</b>  There were no declarations of interest raised.
<b>504</b>	<b>Item 3 – Minutes of the last meeting</b>  The minutes of the previous meeting held on 29 September 2021 were considered and one amendment identified – The Deputy Chief Constable was not listed as an attendee when she was in attendance and is referenced in the minutes. This will be corrected.
<b>505</b>	<b>Item 4 - Matters Arising</b>  As discussed within the previous Committee Meeting, Members will be undertaking a risk training session in January 2022 which will include their input into the risk appetite statement.

**506 Item 5 – Risk Management Update, including Force Risk Register and OPCC Risk Register**

*Presented by Mark Kenyon and Veronica Ejizu.*

The report was circulated in advance of the meeting and therefore Mark Kenyon and Veronica Ejizu highlighted the key points from this report:

Force Risk Register

- Since the previous meeting there has been one additional risk added to the Corporate Risk Register and one risk has been closed.
- There is a slight reduction in two risks. The police cadet leader safeguarding risk has seen mandatory training compliance increase from 60 to 81%. Due to staff turnover, this may never reach 100%. The police uplift has slightly reduced as the application programme has been temporarily paused until the spring, but there does remain an inherent risk around the student training programme.
- Due to increased infection rates and government restrictions, the pandemic may have a further impact on the number of risks.
- The risk concerning Resourcing Mutual Aid for COP 26 has been closed. This is now being managed under a reflective learning process.
- A new risk has been added to the Corporate Risk Register concerning probation and data sharing. This is categorised as critical.
- For the next quarter the Force plan to develop action plans in order to mitigate risks down as the risk scores have remained stable.

The Chair advised that the Committee are pleased to hear that the cadet leaders who are awaiting the mandatory training are paused from carrying out leadership duties.

- Richard Hollands thanked Veronica Ejizu for the detailed report and asked if there was an estimated completion date for when the cadet leaders have completed training within a reasonable percentage.

Veronica Ejizu responded that the figure provided is as of November 2021 and an updated figure and indicative date can be obtained and provided within the next Committee Meeting if required.

- Richard Hollands asked if this figure stays at 81%, what would be the operational impact on the organisation?

Veronica Ejizu advised that this would be dependent upon the number of cadet leaders and could result in reducing the number of intakes or reducing the services of the cadet programme. The number of leaders in place reflects the services and offering that the Force can provide.

- Richard Hollands asked if training was solely delivered in person and if the Force are limiting themselves by doing so in light of the ongoing pandemic. (CRR 16 & 18)

Veronica Ejizu advised that the current training backlog was as a result of the pandemic along with cancellations due to various reasons, including staff absences. In most cases training is delivered in person. The Force are completing a review to consider alternative options to deliver certain types of training but some training required for particular skills may still need to be delivered in person.

- Richard Hollands advised it would be helpful for members to receive information as to whether the Force are making inroads into the training backlog and if this will be a long-term issue.

Veronica Ejizu agreed to report back on this.

- Cath Hannon referred to the number of new risks appearing on the Corporate Risk Register and questioned if this was due to the new regime or if there is an issue developing within those particular areas. Cath also referred to the data for the Parole Board and asked what

has changed to add this onto the Register. Finally, Cath asked how student officers may be failing their university modules, as in previous meetings a rigid structure of providing support has been discussed.

Veronica Ejizu responded that the new risks have been added to the register due to the new regime. For this particular quarter there has been one additional risk added to the Corporate Risk Register as the new regime has been embedded into the organisation with risks being escalated upwards. The Force now have a process in place around risk management, highlighting even those risks that are temporary; they are identified and highlighted with mitigations taking place as soon as possible due to the implementation of the action plan. The new risks added to the register are well recognised and have more oversight and scrutiny as a result.

- The Chair recognised that this describes a dynamic risk process which is what the Committee wants to see.

In terms of recruitment, Veronica Ejizu advised that she could provide information relating to this within the next Committee meeting as a cohort of student officers have recently graduated. The portfolio is aware of this particular risk and additional support measures are being put into place.

- Richard Hollands referred to Paragraph 2.6 of the report and asked for clarification on whether the IT system has been implemented or has a vendor/product been chosen?

Veronica Ejizu clarified that the Probation Service and National Freedom of Information Team are close to finalising the information sharing agreement which aims to control risks better. At present, an IT solution is under consideration in order to mitigate risks. The gross risk and net risk remain the same.

- Richard Hollands highlighted that the risk concerning alarms management was discussed within the previous meeting as an area of concern and asked if there has there been any progress?

Veronica Ejizu confirmed that there has not been a significant amount of progress although the ownership of this risk has moved to a new portfolio area within the Force. The main issue is that the system is outdated and if parts require repairments, alternative parts are not available. A decision needs to be made on how to effectively manage and treat this risk moving forward. This could possibly involve investment in an updated digital system.

- The Chair added that this does not appear to demonstrate sufficient forward thinking. The Committee would like to see improved forward planning and recognition of risks to avoid meeting a critical problem.

Veronica Ejizu assured members that throughout the next quarter the Force will be focusing on the implementation of action plans. There may not be a change in scores, however the profile will be different.

#### OPCC Risk Register

- The OPCC Risk Register is still work in progress, however the document provides a structure of how the OPCC will respond to risk.
- The risks will be managed around the functions of the PCC as well as any risks relating to the delivery of the Police and Crime Plan. There is a slight overlap between delivering the Police and Crime Plan and the functions of the PCC.
- There are scores against risks relating to the particular functions of the PCC and then general themes have been collated from the delivery of the Police and Crime Plan for those items within the delivery plan categorised as red.
- The OPCC aim to bring in a new category on the register if actions are complete. Tracking scores and direction of travel features will be introduced as the register is further developed.

- General themes identified affect a number of areas, for example Resources. The VRU is specifically grant funded and the OPCC are unsure on future commissioning activity which may impact services across the organisation. The organisation also faces a number of cost pressures, including inflation, potential pay awards etc.
- The development of performance indicators within the Police and Crime Plan is still work in progress, and performance in some of the Force areas is a concern. This will be brought to the Member's training session in January 2022.
- The consequences of the risks can be developed further within the report.
- The OPCC are reliant on public sector partners for the delivery of the Police and Crime Plan

The Chair highlighted that it's helpful there is information included from the outset concerning the risks of the functions of the OPCC. The previous Risk Register did not include this.

## 507 **Item 6 – HMICFRS Update**

*Presented by Harry Barton.*

The report was circulated in advance of the meeting and therefore Harry Barton highlighted the key points from this report:

- The outcome of the PEEL inspection was received in October 2021. The report includes an outline of this inspection and a link to the full document.
  - There are two upcoming thematic inspections concerning online sexual abuse and the exploitation of children along with serious youth violence.
  - At least 3 other inspections will take place in the first half of 2022, one of which is a joint inspection following the death of Arthur Labinjo-Hughes.
- The Chair observed that the inspection has picked up concerns that were subject of internal audit reports and asked if internal audit reports are provided to the inspectorate?

Harry Barton responded that there is not a specific request from HMICFRS to view internal audit reports habitually. Should there be a thematic inspection covering an area that internal audit has reported on then the report may be shared.

Lynn Joyce added that occasionally, where the internal audit team has undertaken an audit that HMICFRS are aware of, they will request the report. HMICFRS will also meet with the auditor that completed the review to discuss the findings; interaction has taken place during the missing people and RASSO audits. We are continuing to build this relationship and HMICFRS have access to findings if necessary.

- The Chair asked the Deputy Chief Constable if the findings of the PEEL inspection coincide with where WMP think they are?

DCC Vanessa Jardine responded that broadly speaking the findings reflect the Force's view of the organisation. Before the inspection the Force completed a strategic briefing with HMICFRS providing an up to date current position and HMICFRS shouldn't find anything we don't already know about. The Force were broadly pleased with the findings of the inspection. However, the Force challenged HMICFRS in relation to the concerns raised regarding Neighbourhood Policing that needed greater clarification. This was an impact of the pandemic and the inability of HMICFRS being unable to visit the Force and talk to focus groups, undertake interviews and complete drop in sessions. HMICFRS accepted the Force's comments.

- Cath Hannon highlighted that demand is a key theme and the crime recording rules have changed adding to a paperwork system.

DCC Vanessa Jardine responded that the HMICFRS recognised areas of improvement in Crime Data Integrity. Overall, the Force are comfortable with the level of crime recording although on occasion

this isn't always at the benefit of the victim. The inspection revealed that the Force are not resourced well enough to meet demand and the Chief Constable is in discussion with HMICFRS in relation this.

- Cath Hannon referred to the recommendation that investigating staff should undertake training around vulnerability and asked how this will be delivered given the backlog for staff training?

Harry Barton advised that not all the recommendations are specific to individual forces. HMICFRS recognised the associated initiatives the Force have put into place, such as the THRIVE assessments. There is a recovery plan for training in place that will run over the next 3-6 months which is in line with the recommendations in PEEL for improving our investigative practices.

- Cath Hannon advised it would be helpful for Members to receive further insight into what the training recovery plan entails as it has a number of implications for the PEEL recommendations.

The Chair responded that how to action each individual reference to training moving forward will be discussed with Lynn Joyce outside of the Committee Meeting.

DCC Vanessa Jardine added that she will speak to Veronica Ejizu outside of the Committee Meeting in relation to this being on the risk register and will report back to the next meeting. The Force are aware of the training that staff require; due to the recent changes in government guidance around coronavirus face to face training will again become difficult to deliver.

**508** **Item 7 – Anti-Fraud Bribery and Corruption Annual Effectiveness Review**  
*Presented by Mark Kenyon and Sam Ridding.*

The report was circulated in advance of the meeting and therefore Mark Kenyon and Sam Ridding highlighted the key points from this report:

- A Committee role is to monitor the policies relating to fraud and corruption. Both the Commissioner and Chief Constable have zero-tolerance in this area.
- The Committee have been updated on the areas of concern raised by Internal Audit during the year. Some areas of control were paused temporarily during the pandemic which internal audit advised on in terms of compensating controls.
- The National Fraud Initiative and data matching exercise identified overpayments of £342,000, some of which is still being recovered.
- The Force have attempted to use learning from previous years, including the use of key words within data to streamline searches to identify internal fraud.
- The Force have reported 9 internal fraud cases within the 12-month period. 5 of these have been dealt with as no further action necessary. 4 are still ongoing and under investigation.
- Business interests have not been subject to this report, although there have been 6 reports relating to this. Such matters are dealt with as reflective learning and ensuring staff are aware of their role and responsibilities in relation to business interests.
- In terms of corruption there are two matters of significant interest, including abuse of position for sexual purpose and disclosure of information.
- Work has been completed around prevention and intervention – inputs are detailed to new recruits and members of staff. These are completed by members of the department to allow for questions and increased understanding.
- Professional Standards publish a dilemma of the month, including concluded cases that are anonymised. This allows staff to explore answers and understand cases.
- Teams are reminded to use the annual integrity health check.
- Good practice is recognised and shared with the organisation.
- There are a number of policies that are being reviewed at present, including business interests and gift and hospitality.



	<ul style="list-style-type: none"> <li>- Cath Hannon referred to the table of allegations and abuse of overtime detailed within the report, does this mean that no action was required because the investigation showed there was no case to answer or because it couldn't be substantiated? In relation to the allegation of an Inspector claiming overtime payments, Cath questioned if Inspectors are salaried and if the system would allow for them to claim overtime.</li> </ul> <p>Sam Ridding responded that the information has been explored and unsubstantiated, or where the information is anonymous there is not enough information for the Force to complete an investigation into these matters. In relation to the allegation of an Inspector claiming overtime, Inspectors are not entitled to overtime. This instead related to the time worked over and above their hours, so it was overtime in terms of time owing.</p> <ul style="list-style-type: none"> <li>- Cath Hannon highlighted the case of a staff member providing property to another person and asked for some context and if an update could be provided.</li> </ul> <p>Sam Ridding advised that this matter is still ongoing and therefore she cannot provide a full update. It was suggested the case involved the sale of police uniform and Sam confirmed that this is not the case and does not involve the sale of police uniform and is instead the use of the purchasing system to purchase items that the individual was not entitled to. As soon as the case has been concluded the relevant information can be shared with the Committee.</p> <ul style="list-style-type: none"> <li>- Richard Hollands questioned if there are controls in place in correlation with access rights to the purchasing system and if power to purchase is proportionate to roles and functions?</li> </ul> <p>Lynn Joyce responded that there are segregation of duty controls within the system against ordering and invoicing. If orders are above contract standing order limits, approval is needed. It is unknown if the individual in this case has breached this.</p> <p>Neil Chamberlain added that individuals have access to order against their own budget. This governance exists within the police uniform ordering system. A police officer in a certain role only has access to goods that are required for their duty.</p>
509	<p><b>Item 8 – Corporate Governance Framework</b> <i>Presented by Mark Kenyon.</i></p> <p>The report was circulated in advance of the meeting and therefore Mark Kenyon highlighted the key points from this report:</p> <ul style="list-style-type: none"> <li>• The framework is the scheme of governance between the Chief Constable and Commissioner regarding how they operate on a day to day basis.</li> <li>• This has been through a detailed officer review from senior members within the Force and the OPCC.</li> <li>• There has not been any fundamental change comparing this year to last. The £1m threshold requiring PCC decision has been made clearer.</li> <li>• The revised scheme will be subject to a PCC decision.</li> </ul> <p>The Chair advised that the Committee have explored the theme of shared learning which is touched on in the framework. This is an area we can aim to explore in practice moving forward.</p>
510	<p><b>Item 9 – Public Sector Audit Appointments</b> <i>Presented by Mark Kenyon.</i></p> <p>The report was circulated in advance of the meeting and therefore Mark Kenyon highlighted the key points from this report:</p> <ul style="list-style-type: none"> <li>• The report provides an update in terms of the procurement of external audit services.</li> <li>• We currently procure Grant Thornton through Public Sector Audit Appointments which offers a collaborative approach to procuring external audit services.</li> </ul>

- We have been asked to sign up to an arrangement for a five-year period starting 2023/24. The recommendation is to sign up to the PSAA arrangement, which will need to be completed before March 2022.
  - The external audit market has been turbulent over the recent years, highlighting issues around capability and quality. It is anticipated that fees will go up in future years.
  - There are not many organisations that procure external audit outside the PSAA arrangement.
- The Chair advised that previously the Committee supported the view for joint action. The Chair has attended national meetings and referred to the previous contracts being too successful at driving costs down and a number of the firms providing the contracts had done so on the basis of assumptions of using cheaper labour. A lot of organisations did not receive the service they have paid for. This didn't affect us in the same way, but are we satisfied that PSAA can do the right level of due diligence on the firms bidding to deliver what we need?

Mark Kenyon responded that PSAA have learnt a lot over the last few years. We have focused on the cost element of this, however we have also considered and developed the audit profession in terms of quality and corporate failure. PSAA have learnt from previous issues and factored this into the valuation of contracts in the bidding stage.

- Richard Hollands asked if the rotation of external auditors is a requirement for public sector organisations.

Mark Kenyon responded that unfortunately we cannot find a definite answer to this. We are aware of a rotation system within the firms themselves to ensure there is independence within such relationships.

Members confirmed they were happy to support the use of PSAA for procurement and to act in cooperation with other bodies.

## 511 **Item 10 – Internal Audit Update**

*Presented by Lynn Joyce.*

The report was circulated in advance of the meeting and therefore Lynn Joyce highlighted the key points from this report:

- 4 audits have been finalised since the previous Committee Meeting.
  - 6 audits are in draft awaiting management comments.
  - Recommendations from 37 audits have been followed up during the year showing an 81% implementation rate.
  - The list of outstanding recommendations detailed in Appendix 4 is reducing, demonstrating positive movement and that significant recommendations are starting to be addressed.
  - In terms of the internal audit team's performance, we have completed 50% of the audit plan.
  - We have taken the opportunity to revise the plan due to changes in risk. As a result, two audits were taken out of the plan and one included relating to Commonwealth Games resources.
  - The external assessment of internal audit is looking to take place at the end of June 2022. Members may be contacted to input into this exercise.
  - There were two limited opinions given relating to management of suspects and victim satisfaction.
  - There are similarities in these audits in terms of record keeping with Connect, which was implemented in April 2021. This is largely a legacy issue from the previous system. The Force are running proactive exercises to address this.
- Cath Hannon highlighted the issues concerning supervisory reviews and the high importance regarding decision making around suspects and the demand on officers. How will the Force ensure officers have time to complete these reviews?



	<p>DCC Vanessa Jardine responded that demand is quite extraordinary on supervisors. At present, the Force are going through an investigations review process and may alter the process considering what these reviews need to look like. A risk-based decision may need to be included. ACC Claire Bell is leading on this.</p> <ul style="list-style-type: none"> <li>- Cath Hannon recognised this is not the first review Internal Audit have undertaken of victim's satisfaction highlighting the issues around training and officers understanding of their responsibilities around the victim Code. It is disappointing to see that victim statements are either not being taken or are disappearing into the system and not taken to the court process.</li> </ul> <p>DCC Vanessa Jardine responded that she is equally frustrated by this issue as it seems to be an issue that is difficult to resolve. Student officers are rotated and consequently work in different departments. The Force are aiming to increase the length of their rotations to ensure student officers are upskilled in a more consistent way. It will also form part of the investigations review so we can deliver the service we all aspire to for our communities</p> <p>The Chair responded that the Force need to consider the management actions and ensure they are followed through.</p>
<p><b>512</b></p>	<p><b>Item 11 – External Audit – Joint Audit Findings Report For Information.</b></p> <p>There was no one in attendance from Grant Thornton to present the report. There were no questions from members on the report.</p>
<p><b>513</b></p>	<p><b>Item 12 – JAC Work Programme For Information.</b></p> <p>The Chair asked to include a discussion on risk appetite within the next meeting.</p>