


**APPENDIX A - INTERNAL AUDIT / INSPECTION RECOMMENDATIONS – CONSOLIDATED ACTION PLAN**

Ref No	Recommendation Description	Responsible Officer	Milestones / Date of Completion	Progress to Date	Assurance Level	Status
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<b>Follow Up of Previous Internal Audit Recommendations (9.14/15)</b>						
POCA & Cash Seizures (13.13/14) 3a	<p>All cash bags should be signed by two officers when the cash is seized.</p> <p>The Constabulary should review their current cash bags and determine whether these can be updated to include a second signature upon seizure. If they cannot, procedures need to be updated to reflect the requirements for dual signatures and identify where and how these signatures should be recorded.</p>	Head of Business Support	Sep 15	<p>A new Cash Handling Policy / Standard Operation Procedure (embedded below) has now been developed and adopted by the Constabulary, which clearly requires all cash bags to be signed by two officers when cash has been seized.</p> <p>Cash seizures will be audited quarterly by the Seized Property Supervisor, responsible for property officers / stores.</p> <p> cash_handling_policy_new (June 2015).docx</p>	Medium	Green
POCA & Cash Seizures (13.13/14) 5a	<p>Cash should be dual signed as counted every time it is handled. This includes at the point of seizure if it is counted, and prior to banking.</p> <p>When tamperproof bags are opened and cash counted, this should be dual counted and dual signed within the Property Books.</p>	Head of Business Support	Sep 15	<p>The new Cash Handling Policy reinforces that:</p> <p>“The physical handling of cash should be kept to a minimum and all cash will be bagged and sealed immediately when making a seizure. Seized cash will be sealed in a new tamperproof bag in the presence of another officer and the person in charge of the cash who will be invited to sign both bags. This will ensure any evidential value is preserved and also safeguard the integrity of officers.</p> <p>If the cash being seized is a very large amount that will not fit into a cash bag – then the cash should be bagged twice and sealed twice – both seal numbers to be</p>	High	Green

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				recorded On PMS and/or Sec 18 slip and in the pocket note book of the officer seizing. It should be noted that each bag is one of two, two of two etc for that item on the property listed.”		
POCA & Cash Seizures (13.13/14) 5b	<p>Paying in slips should be retained within the Property Log for every cash seizure banked, to evidence that the amount banked reconciles to the amount recorded within the log.</p> <p>This should reconcile to the amount recorded either at the time of seizure, or when the cash was counted at the Station. All logs should be updated once cash has been counted to record the amount.</p>	Head of Business Support	Sep 15	<p>The new Cash Handling Procedure makes it mandatory to count all cash seizures – other than in very exceptional circumstances.</p> <p>This will ensure that amounts of cash seized can be easily reconciled with cash subsequently banked.</p>	Medium	Green
POCA & Cash Seizures (13.13/14) 7	<p>An audit checklist should be devised that includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• Review of evidence bags to ensure dual signed;</li> <li>• Review of property logs to ensure paying in slips have been retained and cash has been dual signed as counted; and</li> <li>• Cash seized can be traced to the cash banked to</li> </ul>	Head of Business Support	Sep 15	<p>In line with the new Cash Handling Policy, cash will be audited quarterly by the Seized Property Supervisor, responsible for property officers / stores.</p> <p>This will include reconciliation of amounts seized to amounts banked.</p>	Medium	Green


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	<p>ensure accuracy and transparency.</p> <p>Quarterly audits could be undertaken of small samples to ensure compliance with the control framework and the process should be formally documented and added to the procedure documents.</p>					
<p>Follow Up (15.13/14) 1</p>	<p>Recommendations should not be removed from the audit recommendation tracking documentation until all aspects have been fully completed.</p>	<p>CDD Chief Inspector</p>	<p>Sep 15</p>	<p>Audits recommendations are now monitored and tracked through the Constabulary Organisational Review Panel (ORP), as well as the JAC.</p> <p>No recommendations are removed from the audit recommendation tracking documentation outside of JAC processes, and this is monitored through follow up audits, JAC, and the ORP.</p> <p>High and medium recommendations continue to be monitored through the JAC.</p>	<p>Medium</p>	<p>Green</p>
<p>Business Continuity 1.12/13 - 3.1.3.9</p>	<p>Management should design and document an annual plan of BC tests. A Tri-force-wide process for recording, monitoring and reporting the completion and results of BC tests should be developed.</p>	<p>Head of Resilience and Civil Contingencies</p>	<p>01/04/15</p>	<p>Update from Auditors:</p> <p>“During discussion with the Head of Resilience and Civil Contingencies we were advised that a Business Case has been submitted to the JPS Governance Board for approval by the three tri-force Chief Constables; and which detailed the next steps to be development of a detailed implementation plan and Section 23 collaborative agreement. At the time of the</p>	<p>Medium</p>	<p>Amber</p>

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			Oct 15	<p>review the recommendation was not due for implementation and we acknowledge the progress made to date.</p> <p>Update from Head of Resilience and Civil Contingencies:</p> <p>“Earlier in the year JPS Command decided to withdraw the collaboration Business case just before it was due for ratification, and since then have revised their view on the future of the Resilience/Civil Contingencies Business world, therefore these recommendations are still outstanding.</p> <p>A new proposal was I believe tabled at JPS Governance Board in October 2015, which if approved will see a new unit merged with some other workstreams, and the Civil Contingencies staffing level reduced. Therefore it is possible that the staffing levels will be unable to implement these recommendations.”</p>		
Business Continuity 1.12/13 - 3.1.3.11	Management should ensure compliance with the programme of regular test restores and system backups of business critical applications. Appropriate records should be maintained to evidence compliance.	Head of Resilience and Civil Contingencies	Oct 15	<p>Update from Head of Resilience and Civil Contingencies:</p> <p>“Earlier in the year JPS Command decided to withdraw the collaboration Business case just before it was due for ratification, and since then have revised their view on the future of the Resilience/Civil Contingencies Business world, therefore these recommendations are still outstanding.</p>	Medium	Amber

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				A new proposal was I believe tabled at JPS Governance Board in October 2015, which if approved will see a new unit merged with some other workstreams, and the Civil Contingencies staffing level reduced. Therefore it is possible that the staffing levels will be unable to implement these recommendations.”		
Information Governance 3.2.3.3.1	<p>The Information, Assurance, and Strategy Board, or similar, should undertake the following:</p> <ul style="list-style-type: none"> <li>• Document the roles and responsibilities of the Senior Information Risk Owner; and</li> <li>• Formally approve the Terms of Reference and membership of the IASB, or similar, at their first meeting.</li> </ul>	BCH Chief Information Officer	Dec 2015	<p>Update from the Chief Information Officer:</p> <p>BCH SIROs have attended the Police SIRO Training Course provided by Advent IM which gives them the details of their responsibilities.</p> <p>BCH SIRO for all three forces is now Ian Bell (Head of ICT).</p> <p>IASB Terms of Reference have been formally approved, and are embedded below. These will be update to reflect the change in SIRO.</p>  <p>BCH IA Board Tol</p>	Medium	Green
Information Governance 3.2.3.3.2	Management should ensure that the draft Tri-Force Information Assurance Strategy and Information Assurance Policy are approved by the IASB, or similar	BCH Chief Information Officer	Oct 15	<p>Update from the Chief Information Officer:</p> <p>The BCH Information Assurance Policy is approved and published on the Joint Policies Library – review date 01/12/2017.</p> <p>There has been significant change in Information Assurance since this audit and</p>	Medium	Green

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	and made available to staff/officers.			<p>so these recommendations are largely historic. BCH now has accreditation for our national systems and we are engaging with the Cabinet Office on an assessment relating to the Critical National Infrastructure.</p> <p>Historically we have had three separate IA audits for each force. We should now move to a single BCH IA audit.</p>		
<b>Risk Management (8.14/15)</b>						
1.2	<p>A review of the way in which 'operational risk' is recorded and managed at Service Area/Department level is required by the Risk Review Board. We would recommend that:</p> <ul style="list-style-type: none"> <li>• Before policy documents and registers are updated the RRB consider a risk management training workshop.</li> <li>• The current risk management arrangements to be reviewed to ensure effective risk escalation across the organisation.</li> <li>• Appointment of a risk lead in each case to manage the</li> </ul>	Force Risk Manager	Apr 15	<p>Update from Force Risk Manager (with proposed implementation dates):</p> <ul style="list-style-type: none"> <li>• Consideration will be given to providing a risk management training workshop but update of documents and registers will not be placed on hold. (31/10/15)</li> <li>• A review of the current risk management arrangements is part of the work underway since the setting up of the RRB. The formal escalation process is being rolled out. This will be more specifically referenced by amending the wording of S12h of the procedure and guide document. (31/12/2015)</li> <li>• The appointment of a risk lead in each case to manage the register and monitor the risk review process is part of the work underway since the setting up of the RRB. RIO Co-ordinators</li> </ul>	Medium	Green

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	<p>register and monitor the risk review process.</p> <ul style="list-style-type: none"> <li>Identify additional cross forces training requirements as collaboration increases risk will require a joined approach</li> </ul>			<p>(leads) are identified in CDD, Estates, Finance (including Insurance Services and Strategic Procurement), Fleet, ICT, Investigations, L&amp;D and Territorial Policing. Currently, the heads of HR and Corp Comms act as RIO Co-ordinators for their areas pending formalisation in their areas. The embedding of local registers and roll out of the formal process has taken longer than originally anticipated but will continue over the next few months. (31/12/15)</p> <ul style="list-style-type: none"> <li>The identification of cross forces training requirements is in hand. Liaison with Bedfordshire Police and Hertfordshire Constabulary is ongoing with a view to agreeing a common approach in the fullness of time. (31/03/2016 and ongoing)</li> </ul>		
1.3	<p>We would recommend that the RRB review all entries to ensure that suitable information is recorded against a risk to ensure that:</p> <ul style="list-style-type: none"> <li>Risk descriptions explain the risk not causes or effects.</li> <li>Actual controls are not statements.</li> <li>Provide clear detail as to what the control does.</li> </ul>	Force Risk Manager		<p>Update from Force Risk Manager (with proposed implementation dates):</p> <ul style="list-style-type: none"> <li>Risk descriptions will be reviewed and updated. (31/07/15)</li> <li>Controls will be reviewed, updated and clarified. (31/07/15)</li> <li>Assurances will be reviewed and updated – as below. (31/10/15)</li> <li>Assurances will be reviewed and updated by the Force Risk Officer</li> </ul>	Medium	Green

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	<ul style="list-style-type: none"> <li>• Controls are not proposed actions.</li> <li>• Assurances should be reviewed in line with the level of risk exposure.</li> <li>• Assurances need to be more specific as to their validity to support a control, i.e. agenda, minutes, document x/y:                             <ul style="list-style-type: none"> <li>○ A mention as to what was covered,</li> <li>○ Were there any issues that could affect a control?</li> <li>○ If there is a performance link what was the actual performance level?</li> </ul> </li> </ul> <p>Assurances should only be recorded where there is an actual outcome, not a theoretical outcome.</p>			<p>(FRO) and Force Risk Manager (FRM), liaising with the RIO co-ordinators where appropriate. The updated assurances will be presented to RRB in a report for comment and thereafter, reviewed by the FRO in accordance with the existing schedule (at least six-monthly) and presented to RRB six-monthly. (31/10/15)</p> <ul style="list-style-type: none"> <li>• ‘Third party’ assurances are identified wherever possible but in practice as such opportunities are not commonplace and are not always directly attributable, most assurances will continue to be ‘management’. (31/10/15)</li> </ul>		
<b>Seized and Lost Property Follow Up (11.14/15)</b>						
Seized and Lost Property (13.12/13) 4	Following communication of the Cash Handling Procedure; safe checks should be completed periodically to enable the values of the cash held at each of the Property stores to be checked, to ensure they are within the	Head of Business Support	Jun 15	A full safe audit was undertaken by Sarah Truss in the June 2015.  The new Cash Handling Policy / Standard Operation Procedure (embedded below) has been implemented and safe checks will be included as part of the bi-monthly	Medium	Green



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	amounts stated within the Insurance Policy.			audits to be undertaken by the Business Support officers.   cash_handling_policy_new (June 2015).docx		
Seized and Lost Property (13.12/13) 7	Both persons checking and receiving firearms for destruction must on all occasions sign off the paperwork to provide confirmation that correct procedures have been followed in the process.	Head of Business Support	Jun 15	Update from Head of Business Support: “I can confirm that the relevant firearms disposal documents are at Thorpe Wood and have been signed and are stored correctly.  Copies of these are also stored with the firearms officers at FHQ  Future disposals will have a system generated disposal list which will be signed by appropriate parties and stored at the property offices.”	Medium	Green
Seized and Lost Property (13.12/13)	Progress and implement plans to re-introduce dip-sampling of activities / and compliance with required controls for the property stores and report upon outcomes over ‘key controls’ to provide assurances over required procedures.	Head of Business Support	Jun 15	Update from Head of Business Support: “An audit system was put into place but only undertaken once. It has now been reiterated to BSOs and will be completed bi-monthly.”	Medium	Green