

Police & Crime Commissioner for Gwent
Internal Audit Recommendations - Status Report as at 9th September 2016

1. RECOMMENDATIONS REQUIRING MEMBERS' AGREEMENT TO AN EXTENSION OF THE PLANNED COMPLETION DATE

REPORT RECOMMENDATIONS			IMPLEMENTATION			
RED – HIGH PRIORITY/RISK BLUE – MEDIUM BLACK - LOW			GREEN – UPDATES			
Ref	Narrative	Risk	Original Plan Date	Current Plan Date	Responsible Officer	Current Status
	<u>WALES INTERPRETATION & TRANSLATION SERVICES (WITS) 2014/15</u> - <u>April 2015</u>					
R01	<p style="color: red;"><i>Clarity over Responsibilities, Liabilities and Insurance:</i></p> <p style="color: red;">It is recommended that WITS seeks legal advice in order to clarify the responsibilities and liabilities involved in operating WITS as a matter of urgency. In the absence of interpreters holding professional indemnity insurance, an alternative type of insurance or protection should be secured to mitigate the serious risk of legal action in relation to a misinterpretation. Gwent Police, WITS, partner organisations, non-partner organisations and interpreters should be made aware of the responsibilities and liabilities as soon as they are clarified.</p>	H	Apr 16	Oct 16	WITS Manager	<p>The pilot with CIOL took place in March 2016. This involved examination and the option of student membership that in turn enables interpreters to obtain insurance. Discussions with The Director of Resources and Cardiff Council are at an advanced stage around the transfer of the service.</p> <p style="color: green;">Transfer processes are underway and Cardiff Council are at an advanced stage in the decision making process. It is anticipated that this will be completed by December 2016. Much of the governance concerning people, assets and location is being finalised and proposed to reach WITS Governance Board for decision in December 2016. Recommended Completion Date: December 2016.</p>

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R04	<p><i>Documentation of WITS' Governance Structure:</i></p> <p>It is recommended that clear, formal and up to date documentation of the governance structure in place at WITS is established.</p> <p>In addition, up to date terms of reference should be defined for the WITS Partnership Management Board.</p>	H	Oct 15	Apr 16	WITS Manager	<p>Legal advice has been received and planning work has commenced to manage the handover of WITS to a Local Authority. The LA met with force reps on the 9th October 2015, A draft MoU has been received from JLS and that will be used for the new collaboration and will be considered by the WITS Executive Board. .</p> <p>Cardiff Council intends to revise the governance structure and will defer the next Executive Board meeting until transfer in December 2016. No further action is required at this time. Chairing and Executive Board arrangements are being discussed by Cardiff Council and Cardiff and the Vale UHB. Interim organisation governance is being managed by the Assistant Chief Officer – Resources, Gwent Police.</p> <p>Revised Completion Date: December 2016.</p>
R06	<p><i>Procurement Process:</i></p> <p>It is recommended that a formal procurement process is established, documented and applied to all new interpreters added to the WITS Register of Interpreters. WITS should ensure that its operations are compliant under European procurement requirements.</p>	M	Apr 16		WITS Manager	<p>The contract framework documents are drafted with support of the National Procurement Service.</p> <p>Ongoing and with Cardiff Legal team.</p> <p>Revised completion date December 2016.</p>
	<p><u>ICT – NETWORK CONTROL ARRANGEMENTS 2015/16</u></p> <p>- <u>October 2015</u></p>					

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R03	Processes be put in place to notify SRS of the departure of any South Wales Police account holders with access to Gwent Police networks so that access can be rescinded in a timely manner.	M	Dec 15	Mar 16	Head of People Services	<p>A schedule of the SWP staff with access will be provided to the ICT JOINS Group to confirm continuing access requirements.</p> <p>Revised Completion date 31 March 2016.</p> <p>To be reviewed following the re-structure of transactional HR & payroll services and the implementation of a new HR and payroll system in April 2017.</p> <p>Revised Completion date: April 2017.</p>
	<p><u>CREDITORS ARRANGEMENTS 2015/16</u></p> <p><u>January 2016</u></p>					
R02	An exercise be undertaken to determine the reason for late payments in order that effective action is taken to reduce the number so that the Force pays suppliers and contractors in accordance with the Late Payment of Commercial Debts Regulations 2013.	M	Sep 16		PMA	<p>A dashboard was being developed to help assist identifying bottlenecks within systems. This has been prioritised behind other systems for development. This issue will therefore now be addressed as part of the implementation of Unit4 Business World.</p> <p>Revised Completion Date: April 2017.</p>
	<p><u>DUTY RESOURCE MANAGEMENT</u></p> <p><u>ARRANGEMENTS 2015/16 - February 2016</u></p>					

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R01	Development of the requirements for the new duty resource management system be considered alongside the implementation of the new finance, human resources and payroll systems either as a combined HR / payroll and duty resource management system implementation or to take into account the requirements in a separate, later implementation.	M	Sep 16		ACOR	<p>This is agreed and will be considered as part of the FIRMS Programme in collaboration with SWP.</p> <p><b style="color: green;">Revised Completion Date: 31 March 2018 (Phase 3 FIRMS)</p>
R03	Responsibility for ensuring that all training records and databases are accurate and up to date, and that all databases hold the same records be determined.	M	Aug 16		Head of People Services	<p>Agreed. This is a large piece of work and will require resource to cleanse all data sets.</p> <p>It will be co-ordinated as part of the SA8 reviews of the IRSC and L & D to allow ownership and accountability.</p> <p><b style="color: green;">A group has been established under the Chair of the ACO-Resources to review all data flows into and out of the HR/Payroll and training system (ITrent). A targeted stepped improvement will be achieved by the end of the financial year.</p> <p><b style="color: green;">Revised Completion date April 2017.</p>

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2. HIGH PRIORITY RECOMMENDATIONS WHERE THE PLANNED COMPLETION DATE HAS NOT YET EXPIRED

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Ref	Narrative	Risk	Original Plan Date	Current Plan Date	Responsible Officer	Current Status
	<u>IT DISASTER RECOVERY 2010/11</u> <u>- June 2011</u>					
R03	<p>We recommend that management produce and test a formal Disaster Recovery Plan covering force wide IT infrastructure, systems and processes. The Plan should include timescales of when an appropriate solution will be in place to mitigate the risk of prolonged loss of the Force's IT infrastructure and systems.</p> <p>The Plan should include procedures for the recovery and reconfiguration of critical systems and data, network links, hardware (including servers), software, operating systems, communication links (built in redundancy and alternative routing), systems interfaces, activation of hot/ cold/ warm/ duplicate information processing site facilities as well as office facilities and functions, within specified time frames. Such procedures should exist for varying levels of disasters and should support the Force's Business Continuity Planning arrangements.</p>	H	Apr 12	Nov 16	Assistant Director SRS	<p>Confirmation received at JOINS-IT Board on 12 Feb 2016 that the Fairwater DR site has now been handed over to SWP ICT from the supplier. Revised completion date Nov 16.</p> <p>The design and planning is progressing.</p> <p>The new Netapp SAN Data Storage will be developed in cluster-mode and located in the Blaenavon data centre. A migration process will then commence to transfer all the existing Gwent Police systems and data to the new Netapp SAN. Once this exercise has been completed the original Netapp SAN will be rebuilt from 7-mode to cluster-mode so that it can be relocated to the data centre facility in Fairwater, Cardiff providing the Disaster Recovery SAN storage for Gwent Police. Ongoing.</p>

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	<u>IT GENERAL CONTROL:</u> <u>CHANGE MANAGEMENT 2012/13</u> - <u>November 2012</u>					
R02	Introduce a test environment.	H	Dec 13	Nov 16	Infrastructure Services Manager	<p>We will develop a business case for Gwent Police through the BDG / BTCG process to take this recommendation forward.</p> <p>Revised completion date (based on potential DR dates with SWP – end of August 2014 for building works and 6 months commissioning work for ICT – end of February 15 – April 15.</p> <p>Revised completion date April 2015.</p> <p>See report IT Disaster Recovery 2010/11 above, recommendation R03.</p> <p>Revised completion date Sept 2015 Revised completion date July 2016.</p> <p>SWP current estimate for completion of the build for the Fairwater DR site is Dec 2015. Therefore installation of networking and IT equipment can commence post build date with a target commission date for the DR service of Sep 2016.</p> <p>Revised completion date November 16.</p> <p>For latest position, see IT DR June 2011, recommendation R03, above.</p>

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3. RECOMMENDATIONS THAT HAVE BEEN COMPLETED OR REJECTED

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	<u>BUSINESS CONTINUITY & DISASTER RECOVERY</u> <u>2013/14 - June 2014</u>					

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R06	<p><i>Formal BCP/BCM awareness training for staff:</i></p> <p>A sample of staff should be selected annually to confirm their understanding of processes to follow under agreed scenarios. Where weaknesses are identified these should be assessed and appropriate actions result.</p>	L	Aug 14	Apr 16	T/DSupt. Warrender	<p>A model for BCM training has now been developed by Planning Dept and successfully tested 29th June 2016 with senior officers during a table top exercise. Feedback from the officers has been positive and a plan of training delivery is being completed to cover all management across the force.</p> <p>Force training day plans are being finalised between L & D and Planning Dept to deliver critical incident refresher and BCM input to all front line supervisors and constables. Delivery is expected before end of 2016.</p> <p>Specific BCP tests have been completed within the FCS environment with the introduction of a new resilient force communication suite at Vantage Point. A revised BCP has been completed for FCS accommodating recent changes to systems and processes.</p> <p>Completed.</p>
<p><u>WALES INTERPRETATION & TRANSLATION SERVICES (WITS) 2014/15</u> - <u>April 2015</u></p>						

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R03	<p><i>Accreditation and Grading of Interpreters:</i></p> <p>It is recommended that WITS verifies the accreditation of all interpreters before they are added to the Register of Interpreters.</p> <p>In addition, WITS should ensure that all interpreters on the Register are appropriately graded and that it is clear what the grades signify, when they were attained or when they should be renewed.</p>	H	Oct 16	Oct 16	WITS Manager	<p>The pilot examination took place and 25 interpreters in key languages took part. The CIOL are evaluating the examination. The electronic booking system is embedded and interpreters are graded on a 1-10 basis with jobs being allocated to the best qualified interpreter who is available at the time. Personal records including qualifications are captured and held in a folder in the WITS drive. Revised completion date October 2016 (the proposed handover date).</p> <p>The final update to the new system went live on 1 August 2016. Regrading and allocation policies are complete.</p> <p>Completed.</p>
<p><u>DATA PROTECTION – INFORMATION ASSET OWNERSHIP 2014/15 - May 2015</u></p>						

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R03	<p><i>Policies and Procedures for Information Asset Management:</i></p> <p>It is recommended that training specific to the Force's Information Asset Management policy and procedures should be provided to all Information Asset Owners which should be updated and amended as changes occur. Training should then be provided for all Information Asset Owners as they gain the responsibility of maintaining an Information Asset Register.</p> <p>Training should also be provided to all staff so that they may become aware of any unidentified Information Assets to be registered and maintained appropriately.</p> <p>A programme should be put in place to ensure that all staff also complete the compulsory NCALT training – Protecting Information Level 2 e-learning, and all Information Asset Owners complete the Protecting Information Level 3 e-learning.</p>	H	Sep 15	Aug 16	Manager Of Data Management Unit	<p>Once allocation of the information asset ownership has been completed, mandatory NCALT training at the appropriate level will be rolled out. The IAO Guidance document will be re-produced in accordance with the Force Policy and Procedure template. NCalt Training completion will be reported and monitored via the Accountability forum by L&D. The e learning programmes have been commenced and progress will be reported at JAC. The current status is:</p> <p>Level 1 – 1,425 complete, Level 2 – 468 complete, Level 3 – 103 complete</p> <p>This was discussed at the IAB on 17th June at which line managers were reminded to ensure compliance in Level 1 in their Service areas with completion by April 2016.</p> <p>Signed off at IAB August 2016.</p> <p>Completed.</p>

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R04	<p><i>Mapping of Information Asset Ownership:</i></p> <p>It is recommended that an Information Asset Ownership map should be created to adhere to APP guidelines, showing a hierarchy of the responsibility for Information Assets. This should be reviewed and updated regularly in accordance with an Information Asset Management policy.</p> <p>Even though it appears that the Head of Criminal Justice, Data Management and Information Security holds responsibility for creating an Information Asset Management system increased involvement from the SIRO is required to identify and map Information Asset Ownership.</p> <p>The map must include the Chief Officer, identified Information Asset Owners and any respective Senior Information Risk Owner as a minimum to be APP compliant. The map may also include any person empowered by the Chief Officer to manage the everyday Information Asset Registers of police information within the force and other persons such as those working in IT, security and Information Management who have been assigned related roles within the function. This applies to all teams in all roles across the Force.</p>	H	Aug 15	Aug 16	Manager Of Data Management Unit	<p>This recommendation is fully accepted and will form the initial stage of the work that will be completed in Gwent. An IAO Register Template is incorporated as part of the IAO Guidance document. This will identify IA Owners. The Information Assurance Team will co-ordinate the completion of the IA Register.</p> <p>Revised completion date January 2016.</p> <p>Following JAC intervention for completion by November 2015 the status is as below: Asset owners identified – 100% Template issued to asset owners - 100% ISO visit to asset owners – 40% Returns completed - 20%</p> <p>Progress will be considered at the next Information Assurance Board.</p> <p>At 17th Feb 16. Asset owners identified – 100% Template issued to asset owners - 100% ISO visit to asset owners – 24 of 24 depts Returns completed – 24 of 24 Revised completion date 31 Aug 2016.</p> <p>Signed off at IAB August 2016. Completed.</p>

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R05	<p><i>Information Asset Ownership Guidance:</i> It is recommended that when constructing each of; an Information Asset Register, Information Asset Mapping, Information Asset Guidance and Information Asset Ownership Training careful attention is paid to each of the sources of information and guidance policies available on the APP website. Further clarification should be requested to better define the main source of guidance that the Force is required to adhere to. This clarification should be sought from the ICO in response to the letter received on 17 February 2015.</p>	M	May 15	Aug 16	Manager Of Data Management Unit	<p>Clarification has been requested from the ICO and any required action will be included in the work plan developed.</p> <p>NCALT complies with APP, so it is just the compliance rates which are available at a team level on qlikview and force level provided by L+D to IAB.</p> <p>Signed off at IAB August 2016.</p> <p>Completed.</p>

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	<u>GOVERNANCE COLLABORATION ARRANGEMENTS 2015/16 - September 2015</u>					
R01	In accordance with the 'Collaboration Principles' report (dated 31 January 2013) the Chief Constable Gwent Police is to define the Force's approach to Partnering / Collaborative arrangements through a Policy or Framework to underpin the Collaboration Strategy agreed in January 2013.	M	Jan 16	Jun 16	Chief Supt Rhiannon Kirk	A policy framework will be developed that articulates the force's approach partnering / collaboration. This will be completed once R02 below is complete. Report submitted to COT 10 th June 2016. Completed.
R02	The 'Collaborative Schemes' document should be used as a foundation to form a complete register of all partnership / collaborative activities in existence by the Force, which is to be held centrally incorporating the commencement of each arrangement, the partners involved, whether a formal agreement is in place and if so when it is due to end or be reviewed.	M	Jan 16	Jun 16	Chief Supt Rhiannon Kirk	A register detailing the collaborations (police and other public services) will be developed. A scoping study identified 21 areas of Gwent Police and the OPCC where Partnership / Collaborative Arrangements may exist. 31 SPOCs were nominated by Heads of Area/Dept. and a data collection exercise is underway to identify the breadth/scope of extant Arrangements. Review meeting on 21st ^h June 2016. Completed.

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	<u>REVIEW OF THE CORPORATE COMMUNICATIONS ARRANGEMENTS OF THE OFFICE OF THE POLICE and CRIME COMMISSIONER 2015/16 - June 2016</u>					
R01	<p style="color: blue;">As a matter of urgency a meeting be held between the Office of the Police and Crime Commissioner’s Chief of Staff and Communications Manager with representatives of the Chief Constables staff who can provide clarity on the current range of issues following the implementation of the restructure of the Corporate Communications Department.</p>	M	July 16		<p>Communica-tions Manager</p> <p>DCC pro tem</p>	<p>Meeting to be arranged now that the new Police and Crime Commissioner elected into office. OPCC Communications Manager to provide details of unresolved issues and ‘pinch’ points following the restructure of the Corporate Communications Department and discuss how we move forward and take positive steps to resolve issues.</p> <p style="color: green;">New Head of Corporate Communications has been appointed and he is not aware of any issues within the department following the restructure. He is therefore happy for this item to be closed.</p> <p style="color: green;">Completed.</p>

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	<u>REVIEW OF THE MARKETING SOCIAL NETWORKING ARRANGEMENTS 2016/17</u> - <u>August 2016</u>					
R01	Twitter accounts be reviewed, and either actively managed or closed down.	M	Aug 16		Corp Comms Officer West	Twitter accounts that are currently not in use need to be closed by notification to the SRS Project Team. Followers will be notified and redirected. Routine monitoring of the account usage will be implemented. SRS has been advised of the accounts that are to be closed and this has been actioned. Completed.
R02	The @heddlugwent twitter feed to post Welsh language tweets simultaneously to the English language tweets on @gwentpolice.	M	Aug 16		Corp Comms Officer West	This Welsh Language account will be cleared and re-established under the requirements of the Welsh language Standards. Completed.
R03	Develop and implement a policy on the management and update of social media account passwords.	M	Aug 16		Corp Comms Officer West	There are 50 accounts and inappropriate entries are already deleted by supervisors. - The password will be reset every 6 months. Completed.

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R05	The OPCC's Facebook page be updated to reflect the election of a new Commissioner.	L	Aug 16		SRS Project Team	This has now been updated. Completed.
R07	Instagram and Pinterest accounts be either properly maintained or else deleted.	L	Sep 16		SRS Project Team & Corp Comms Manager	The Pinterest account will be closed. Corporate Comms Officers will manage Instagram. Completed.
R08	Blog posts be organised to signpost/link to similar blogs.	L	Sep 16		SRS Project Team	The SRS will create a link from the internet page to a specific blog page containing all Inspectors blogs. Completed.
R09	Set and monitor social media communications performance targets.	L	Aug 16		Corp Comms Manager	This will continue to be monitored. New Corp Communications Operational Manager appointed August 2016. Update from DCC – we will not be setting targets. Completed.

PFA - Principal Financial Accountant HOP – Head of Procurement