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Gwent Police & Crime Commissioner and Chief Constable for Gwent Police

Joint Audit Committee 5 June 2020 – Update Paper

Annual Audit Plan 2020 - impact of COVID-19 update letter

The COVID-19 national emergency has had an unprecedented impact on the UK and will significantly impact on public bodies' preparation of the 2019-20 accounts and our audit work, both financial audit and performance audit.

In response to the government advice and subsequent restriction on movement, we have stopped all on site work at audited bodies and our own offices have closed. Audit Wales staff are working from home and will continue to make whatever progress we can whilst working and engaging with audited bodies remotely.

In light of the above, there are some aspects of the audit plan we issued to you on 5 March 2020 that need to be updated. Our *Annual Audit Plan 2020 – impact of COVID-19 update letter* issued to Gwent Police on 1 May 2020, sets out the key issues identified as a result of the impact of COVID-19.

2019-20 financial statements

Interim audit work

We commenced our initial planning in January 2020.

Our second interim audit visit took place in March. During this visit we documented the key financial systems and processes, as required under the International Standards of Auditing and we undertook our transaction testing for the 2019-20 financial year in the following areas:

- Non-pay expenditure, income and payroll testing on periods 1 to 9; and
- Capital expenditure testing on periods 1 to 9.

We also agreed the accounting treatment for the termination of the Ystrad Mynach Police Station PFI scheme.

Since the national lockdown due to the COVID-19 pandemic, we have maintained regular weekly contact with the Finance Team to discuss progress against the year-end closedown plan and to provide support as issues have arisen.

The Finance Team have continued working towards producing the draft financial statements by 31 May 2020, although some delays in obtaining information from external sources have been encountered. That said, we understand that the draft financial statements will be available to enable us to commence the final account audit week commencing 8 June 2020.

We have also continued to monitor progress made against the recommendations included within our Management Letter that was presented to the December 2019 JAC meeting. An update of the progress being made can be found in **Appendix 1** and **2**.

Other matters for consideration

Value for money conclusion work

In addition to our standard audit programme for our value for money work, we undertook a more focused piece of work, reviewing the arrangements in place for securing economy, efficiency and effectiveness when undertaking collaborative working between police forces in Wales. We presented our emerging conclusions for this work to the All Wales Finance and Resources Group (AWFRG) meeting on 4 February 2020, and had planned to present our findings to the Collaboration Management Board (CMB) on 9 March 2020 and the All Wales Policing Group on 12 March 2020, however the CMB meeting was cancelled. We have since presented our Audit Findings briefing to the AWFRG meeting on 14 May 2020 and now plan to share our findings to the CMB, the Collaboration Programme Board and the Welsh Chief Officers Group in June 2020 and to the All Wales Policing Group in September.

Audit Wales review of Shared Resource Service (SRS)

This review will seek to consider whether the SRS collaboration is sustainably delivering an effective, efficient and economic provision within this dynamic environment, for now and for the future, for its partners both individually and collectively.

Work with the five partners commenced in February 2020, which involved running workshops, discussions with key personnel and gathering information. We had planned to share our findings from this review at a joint feedback and action planning workshop with each of the partners in April 2020, followed by a short joint report, summarising our findings and including our proposals for improvement or recommendations where relevant later in the year. However, due to the COVID-19 pandemic, the Auditor General communicated to all audited bodies in April 2020, his decision to postpone all on-site performance audit work until COVID-19 restrictions are lifted. Therefore, the joint feedback and action planning workshop will be rescheduled for later in the year, once restrictions are lifted.

Audit Wales publications

Our publications can be accessed via https://www.audit.wales/publications including:

Annual Plan 2020-21 – April 2020

Our Annual Plan sets out our overall ambitions and objectives, alongside our associated work programmes and KPIs for 2020-21. However, our immediate priorities have been fundamentally altered by the extraordinary circumstances of the Covid-19 outbreak.

So, what's different – May 2020

Findings from the Auditor General's Sustainable Development Principle Examinations. During 2018-19 and 2019-20, we carried out 71 examinations across the 44 Welsh public bodies named under the Act and reported back to each body.

This report provides an overview of what we looked for, what we found and what we will expect to see in future. It also draws on other relevant findings across the breadth of our audit work

Tracy Veale - Audit Manager 27 May 2020

Appendix 1 - Matters arising from the audit of the Police and Crime Commissioner (PCC) for Gwent's and Chief Constable (CC) for Gwent's 2018-19

Exhibit 1: final audit - as per ISA 260

Detail	For management to consider	Management Response	Progress update as at May 2020
	Draft accounts quality	y and submission	
The draft accounts submitted for audit were not complete. For example, the draft accounts did not include the Movement in Reserves Statement (MIRS), Expenditure and Funding Analysis (EFA), the Cashflow Statement and associated cashflow notes. These elements of the accounts were not received until we received Draft 2 of the financial statements, two weeks after the 31 May 2019 deadline.	The year-end closedown plan should be revisited to ensure the draft accounts are complete and have been through a suitably robust quality review process before the accounts are submitted for audit.	The year-end close-down plan has been reviewed and updated following the completion of the audit. A further review will be carried out by 31 December 2019 following the post-audit learning exercise on 30 September. The resourcing of the plan will also be considered as part of the review.	We have met with the finance team and have agreed to be on commence the financial statement audit on 8 June 2020, working remotely. This will provide the finance team with a week to ensure the accounts and all working papers are fully completed and have received a robust quality assurance review ahead of the audit starting.

Detail	For management to consider	Management Response	Progress update as at May 2020
The draft accounts had not undergone a suitably robust quality assurance review by 31 May deadline which has resulted in the audit identifying a significant number of formatting and numerical amendments.			Following the restructure of the finance team, additional capacity has been built into the year-end closedown processes to enable a robust quality assurance review to take place.
The need to produce a Draft 2 of the financial statements early in the audit process, resulted in key Finance Officers being sometimes unavailable for audit questions during the first two weeks of the audit which delayed audit progress.			Audit Wales and the finance team have agreed to share planned leave/meetings during the audit period.
In March 2019, we had fed back comments on the financial statements template which we understood would be used to produce the draft accounts. This exercise included agreeing the prior year's comparative figures.	Training should be arranged to ensure finance staff fully understand how to maximise the benefits of using the BRB software to prepare the financial statements.	BRB training has already been arranged for relevant staff within the finance team and will be completed by January 2020. This will be extended to the Audit Wales audit team to identify	Audit Wales audit lead has received a demonstration from Jackie Glossop as to how the BRB software works. The finance team have told Audit Wales improvements have been

Detail	For management to consider	Management Response	Progress update as at May 2020
However, this template was not used due to limitations with the BRB system which requires reformatting of the accounts outside of BRB every time a new version of the accounts is run. As a result, the work undertaken in March had to be repeated on the draft accounts received during June.		opportunities to improve the audit process.	made to the information within BRB which will help with this matter. We will keep under review during the audit process.
	Working papers and	staff availability	
Working papers were generally of a good standard and overall, provided a good audit trail to source information. However, there is room for improvement in a number of working papers such as remuneration and reserves.	Working papers to support the figures within the financial statements must be prepared in accordance with the deadlines as agreed within the audit deliverables schedule. We will work with the Finance Team to revisit the audit deliverables schedule for the 2019-20, building in any scope for auditing account areas earlier.	The finance team will work with Audit Wales to improve the content and timing of items within audit deliverables schedule for 2019/20.	The Audit Deliverables schedule has been drafted by Audit Wales and shared with the finance team for comment. Audit Wales met with the finance team on 27 February 2020 to provide clarification around audit evidence and guidance on how to improve working papers.

Detail	For management to consider	Management Response	Progress update as at May 2020
			An Audit Deliverables document has been agreed between both parties
In addition, due to technical issues regarding saving working papers to the newly issued laptops in Finance, not all working papers were available to us at the start of the audit in agreement with our agreed deliverables schedule, and finance staff were not always available to us to answer audit queries in a timely manner.	Every effort should be made to ensure that key finance staff are available during our 'tight audit window' and an accurate schedule of finance staff availability is provided to us prior to the start of the audit. Any changes to the schedule should be communicated to the audit team as soon as possible to avoid unnecessary delays.	Scheduling the availability of key finance and Audit Wales staff will be undertaken as it is key to improving the audit process.	A timetable of staff availability (key finance staff and Audit Wales staff) will be agreed closer to the final audit start date. Gwent Police have shared their annual leave schedule for key staff with Audit Wales.
	Amended acco	unts quality	
On 18 July we received amended financial statements for both the PCC Group and CC. Our review of the amended financial statements identified numerous instances	Amended financial statements must be subject to a robust quality review process to ensure that amendments have been processed as expected prior to	Late pension disclosure adjustments caused a number of late amendments. We will revisit the level of contingency within the	Following the restructure of the finance team, additional capacity has been built into the year-end closedown processes to enable

Detail	For management to consider	Management Response	Progress update as at May 2020
where numbers and text had not been amended as expected. The volume of further amendments could have been reduced had a robust quality assurance review been undertaken on the financial statements before being provided to us. Further revised sets of accounts were received on 22 July containing all amendments as expected.	submission to the audit team, to enable the tight deadlines to be met.	timetable for the year-end closedown plan to mitigate this for 2019/20.	a robust quality assurance review to take place. Audit Wales will continue to alert the finance team to any audit issues that come to light as soon as possible.
	Control Account R	econciliations	
In our June 2019 Audit Update Briefing to Joint Audit Committee members, which was based on our March 2019 audit visit, we noted that the Sundry Creditor account reconciliation (one of 12 accounts payables reconciliations) had only been completed up to Month 2.	Monthly control account reconciliations must be completed promptly and thoroughly, including resolving unreconciled differences, to give assurance over year-end balances.	The finance team have been reminded of the importance of completion and review of control account reconciliations during the finance year. There is now a robust management process for oversight and authorisation.	We were informed at a meeting with the finance team on 10 February 2020, that all reconciliations have been completed up to month 10. All monthly control account reconciliations will be reviewed during our interim audit visit commencing 9 March 2020.

Detail	For management to consider	Management Response	Progress update as at May 2020
As a result, we undertook additional testing of in-year and year-end transactions to ensure the expenditure and creditor balances within the draft financial statements were not materially misstated. Following completion of the sundry creditor reconciliations we found the year-end sundry creditor reconciliation was not signed off as reviewed and dated. In addition, during our testing of control account reconciliations, we identified the following issues: • Bank reconciliations during the year are automatically completed and no manual reconciliation is completed except at year-end. However, there was no evidence of review of these automatic reports and there are some large unmatched differences. • Payroll reconciliations were reviewed, however, there were significant delays in			The latest schedule of reconciliations we have is for the 27 April 2020. At that time, all reconciliations were complete up to month 11, except for the VAT account, which was last reconciled at month 10. The month 12 reconciliation for all control accounts work was on- going as part of the year end processes.

Detail	For management to consider	Management Response	Progress update as at May 2020
 doing so, e.g. both month 3 & 6 reconciliations were not reviewed until 1 March 2019. VAT reconciliations were not signed off as completed and reviewed and they included a number of unreconciled items. 			
	Treatment o	f Levies	
We raised a query with the Chief Finance Officer around the consistency of levies and whether they should be above or below the line in the Comprehensive Income and Expenditure Statement (CIES). Gwent Police includes Police National Computer costs (PNC) and the helicopter levy in its levies line which falls below the costs of services. However, discussions suggested these	The treatment of levies should be reviewed by Gwent Police and also considered at an all- Wales level to ensure consistency of treatment across each of the four Welsh Police Forces.	This will be reviewed as part of the planning for the 2019/20 accounts and audit.	It has been agreed that levies will now be reflected in Cost of Services.

Detail	For management to consider	Management Response	Progress update as at May 2020
items relate to day to day business and should therefore be included within cost of services.			
	Correction of errors in Agress	so Business World (ABW)	
 From our account payable substantive testing, we identified instances where corrections had not been made in the ledger: A number of VAT only invoices (Carl Furnish v Gwent Police against GL code 11516) had been input onto the ledger at their correct VAT only amount but had also been input at their net invoice value under a different transaction number. We established that the total net value of the invoices concerned was £20,812.69 	Consideration should be given as to whether further training on VAT accounting is needed and the need to ensure any corrective action is taken on a timely basis.	Further training to specific members of the finance team will be provided by January 2020 along with desk notes that will reflect the changes.	Interim transaction testing has been undertaken for periods 1 to 9. We intend to complete the testing for the remainder of the financial year when we commence the final audit. We have not identified issues of the nature reported previously.

Detail	For management to consider	Management Response	Progress update as at May 2020
 which had not been corrected in the ledger. Transaction 4006603 had been input onto the general ledger against code 11495 on the incorrect basis that it was vatable. This £56,681.92 understatement of expenditure was flagged to the client during our interim testing in February 2019, however no corrective action was taken until 12 July 2019. 			
	Related Par	ty Note	
Our audit testing of the related party note identified several omissions, including a missed related party disclosure and the need to include debtors and creditors for all related parties.	The related party note should include all related parties and should be fully compliant with the Code requirements.	This will be addressed for 2019/20.	We have been alerted to the fact there may be issues in relation to obtaining all the related party disclosures for staff who are not currently working or who have left employment.

Detail	For management to consider	Management Response	Progress update as at May 2020
			We will provide an update on progress at the next JAC meeting. In terms of the related part note, the finance team have confirmed that they are aware of the disclosure requirements.
	FIRMS Service Level	Agreement (SLA)	
There is still no SLA in place for FIRMS support which may give rise to risks around data protection, backup or access rights issues. We have been monitoring this position over the past year however an SLA remains outstanding. We acknowledge there have been changes in the leadership of the FIRMS team with a new Project Manager taking up position in February 2019.	A FIRMS SLA should be put in place with immediate effect.	A draft S22a agreement has been produced that is under review by Joint Legal Services for approval at the Digital Services Division (DSD) Gold meeting in December 2019.	This will be reviewed during out interim audit visit commencing 9 March 2020. We will provide an update on progress at the next JAC meeting. The SLA is now in place.

Appendix 2 – Progress of prior-year recommendations

Exhibit 3: progress of prior-year recommendations

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
	Accounts qu	uality and submission		
The draft accounts were not appropriately formatted and incomplete due to the first time use of CIPFA's Big Red Button. The draft accounts were also submitted to us after the agreed timetable. It was evident that the draft accounts had not been through a robust quality review process before being submitted to us for audit. In addition, the draft accounts contained, and the final amended accounts still contained, numerous rounding errors. We understand that these rounding errors were created by the Big Red Button, and despite many attempts to rectify them, the	Finance need to reconsider their close-down plan following the issues encountered this year ensuring enough time is built in for a robust quality review process before the accounts are submitted to us for audit.	A full review and update of the closure plan will be completed before 31 December 2018. Sufficient time will be included in the plan for a robust quality assurance review of the draft financial statements by senior managers. Target Date: 31 December 2018.	Ongoing This has not been fully implemented as similar issues have arisen during our 2018-19 audit. This recommendation has therefore been superseded by the 2018-19 recommendation in Appendix 1 above.	See Appendix 1.

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
Finance Team have been unable to do so.				
	Working pape	ers and staff availability		
Working papers were of a good standard and, overall, provided a good audit trail to source information. However, the working papers were not submitted to us in line with our agreed deliverables schedule but on a request basis. In addition, we were not made fully aware of all annual leave and other work commitments of the Finance Team. As a result, we could not effectively plan our work to ensure that the required finance officers were available when needed. Further problems arose due to the fact that audit queries could only be resolved by the staff responsible for individual account areas. This led to further delays in receiving working	Audit Wales will look to revisit our deliverables schedule for the 2018-19 audit process building in any scope for auditing account areas earlier following discussions with Finance. Finance need to ensure they sign up and deliver on the working paper deadlines as agreed. In addition, Finance need to ensure every effort is made that key finance staff are available during our 'tight audit window' and an accurate availability	We will work with Audit Wales to ensure the deliverables schedule reflects an agreed list of working papers, as well as the key contacts for individual areas and their availability during the accounts/audit process. Target Date: 31January 2019	Ongoing This has not been fully implemented as similar issues have been experienced during our 2018-19 audit. This recommendation has therefore been superseded by the 2018-19 recommendation in Appendix 1 above.	See Appendix 1.

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
papers and information when staff were not available.	schedule of finance staff is provided on the outset of the audit to allow us to plan our work around this.			
	Financ	ce Staff Training		
Finance staff had not received the appropriate level of training regarding the new financial system. A number of difficulties arose as part of the implementation of the new Agresso Business World (ABW) finance system during the year, for example, relating to the scheme of delegation and the processing of invoices. Finance staff involved in the original implementation of ABW have since left and this loss of knowledge has put additional pressure on the Finance Team. Inexperience amongst the remaining Finance Team was evident when reports to enable reconciliations	Finance staff need to ensure they are adequately trained in respect of new systems, notably ABW and CIPFA's BRB to aid future year's accounts production. Desk instructions should also be updated following implementation of new systems.	PwC are currently mapping the processes within the finance systems and we will be supplementing these process maps with additional notes where necessary. All finance staff will be briefed on the account's closedown process and timetable for 2019/20. This briefing will include the working papers and reports required from BW and the BRB to support	Partially Completed The Finance team have invested time to improve the mapping and knowledge amongst the finance team for the production of the 2018-19 accounts.	See Appendix 1 in relation to BRB training.

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
were not run at the appropriate time and could not be reworked due to the live nature of the system.		the production of the accounts. Target Date: 31 March 2018		
In addition, Finance staff had not received the appropriate level of training regarding the use of CIPFA's Big Red Button software. CIPFA's Big Red Button software was used to compile the accounts for the first time this year. The use of the new Big Red Button software to compile the accounts resulted in difficulties as the Finance Team were unfamiliar with the software and, in several instances, had to rely on CIPFA consultants to provide answers. This meant that audit queries took longer to resolve than usual. These issues should reduce next year as the finance team become more experienced with the finance system and the accounts compilation process.				

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
	Control Acc	count Reconciliations		
In our June 2018 Audit Update Briefing to Joint Audit Committee members, which was based on our March 2018 audit visit, we highlighted that control account reconciliations had not been completed during the year. Although the Finance Team were able to complete the accounts receivable reconciliations retrospectively, this was not possible for the year-end accounts payable reconciliation. The new finance system is a live system and no report was run as at 31 March 2018 to enable the accounts payable reconciliation to take place. As a result, we undertook additional testing of year-end transactions to ensure the creditor balances within the draft financial statements were not materially misstated.	It is important, going forward, that the finance team implement robust internal controls to ensure that monthly reconciliations are completed promptly and thoroughly to give assurance over year-end balances. Finance need to ensure suitable evidence of timely review of control account reconciliations is implemented.	The monthly task plan list includes a sheet to track the production and review of control account reconciliations throughout the year. This sheet will be updated at each month end to record that reconciliations are taking place and have been reviewed. Target Date: 30 September 2018	Partially Completed All reconciliations, except for the Sundry Creditor control account, were completed during 2018-19. However, some issues were identified during our audit testing which have been reflected in our recommendations in Appendix 1 above.	See Appendix 1.

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
Control account reconciliations were also not printed and signed off by preparer or by reviewer, therefore little evidence that they had in fact been reviewed by the Head of Finance.				
	Bank	Reconciliations		
Bank reconciliations had not been completed as at 31 March 2018. No cashbook report was run as at 31 March 2018. As a result, the Finance Team were unable to complete a full year-end bank reconciliation between the bank statement, the cashbook and the general ledger. However, whilst the Finance Team were able to complete a reconciliation between the ledger and the bank statement, unreconciled items amounting to £13,105 remained unsupported.	It is important going forward that the finance team implement robust internal controls to ensure that monthly reconciliations are completed promptly and thoroughly to give assurance over year-end balances. Finance need to ensure suitable evidence of review of the bank reconciliation is implemented.	The monthly task plan list (above) includes bank reconciliations. Target Date: 30 September 2018	Completed We did not identify any issues in our 2018-19 audit work.	n/a

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
	Mapping a	nd Chart of accounts		
A large number of amendments in the financial statements were in respect of classification issues which arose due to incorrect mapping of the trial balance. In addition, the introduction of the Big Red Button highlighted weaknesses with Gwent Police's Chart of Accounts.	Finance should undertake a review of their mapping ahead of the 2018-19 audit. In addition, they should also look to eliminate weaknesses in their Chart of Accounts with additional Trial balance codes being created for the 2018-19 financial year. The Finance Team should consider whether there is scope to produce month 9 accounts which would help to identify problems before year-end.	This will be carried out before 31 March 2019 as part of the year-end closure process. Target Date: 31 March 2018	Completed The Finance team have invested time in improving the mapping during 2018-19. Month 9 accounts including comparative figures only and formatted template were provided to the Wales Audit Office.	n/a

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
	I	Provisions		
The year-end listing of provisions was provided by the legal team. However, audit testing identified that one of the provisions tested had been closed before year-end and therefore should not have been included on the year-end listing.	Joint Legal Services need to ensure they review this listing to include only 'true' year-end provisions.	Joint Legal Services will be briefed on the requirements for the accounts as part of the year-end closure process.	Completed We did not find any further instances of this during our 2018-19 audit.	n/a
	Ledg	er Corrections		
 During our audit, we identified a couple of ledger corrections that were needed, although the accounts correctly reflected these: the write-off of impairment and depreciation on the decommissioning/disposal of computer hardware had been posted to the incorrect codes. 	Finance should ensure corrections are made in the ledger so that prior-year comparatives are accurately reflected in the 2018-19 accounts.	These two corrections have been actioned. Target Date: 30 September 2018	Completed These ledger corrections have now been made.	n/a

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
• the balances on two AHFS codes were incorrect. The incorrect balances were on codes: 50762 - AHFS Opening balances and 50256 Cumulative Depreciation - AHFS which showed balances of £4,384,401 and -£2,035,055 respectively.				
	Chief Financ	e Officer Secondment		
The Chief Finance Officer has undertaken a part-time secondment to South Wales Police during 2017-18, however no disclosure was included in the draft financial statements for this in terms of the Remuneration and Related Party Notes and amendments were required late in the audit process.	Finance should ensure all known activities are given consideration and included within the draft financial statements to avoid late amendments in the audit process.	We will agree a list of individuals requiring related party returns with Audit Wales as part of the closure process and agree any additional disclosures required before year-end. Target Date: 31 January 2019	Complete We did not identify any further issues during our 2018-19 audit.	n/a

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
	FIRMS sys	stem administrators		
At the time of the audit, there were 23 members of staff with FIRMS system admin access. This seems to be a high number of staff having admin access rights within the system.	 The FIRMS team should review these rights, and consider: whether they are appropriate to meet the business need; and whether Gwent Police are happy to accept any risks associated with having a high number of staff with full administrative access rights to the system. Having high numbers of users with system admin access presents an increased risk to system security and inappropriate system use. 	Access levels will be considered and amended where necessary on an ongoing basis. Target Date: 30 November 2018	Completed We did not find any further issues during our 2018-19 audit.	n/a

Detail	For management to consider	Management Response	Status as at 2018-19 audit	Management Response
		Journals		
ABW includes a feature to allow supporting schedules for journals raised to be saved in the system with the journal. This feature however is not currently used. Staff store journal workings within a series of folders on the Gwent Police server. Our audit experience has found that it is more time consuming obtaining this information from the Gwent Police server rather than ABW.	Finance should ensure all supporting documentation to journals raised is stored in ABW, in order to improve the audit trail.	Staff will be reminded of the need to attach relevant supporting documentation to transactions within BW. Target Date: 31 March 2018 Status: Ongoing	Ongoing This feature is currently not being fully utilised by finance staff. Training should be arranged to ensure finance staff understand how to fully maximise the benefits of using the BRB software to prepare the financial statements.	This will be implemented in this financial year. A desk note is currently being drafted on backing documentation for journals. Training will then be provided to the finance team and to Audit Wales to enable access for review. Audit Wales Update: This will be reviewed during our final audit visit commencing 8 June 2020. We will provide an update on progress at the next JAC meeting.

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