Cumbria Shared Internal Audit Service

Internal Audit report for Cumbria Constabulary

Audit of Collision Reduction Officers

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Audit Report Distribution

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Audit Committee:	The Joint Audit Committee which is due to be held on 17th March 2021 will receive the report.

Note: Audit reports should not be circulated wider than the above distribution without the consent of the Audit Manager.

Executive Summary

Background

This report summarises the findings from the audit of **Collision Reduction Officers**. This was a planned audit assignment which was undertaken in accordance with the 2020/21 Audit Plan.

Collision reduction activity is important to the organisation because it helps to reduce the number of people killed and seriously injured on the county's roads each year. This contributes directly to the strategic priority of keeping Cumbria safe and the delivery of objectives in the Police and Crime Plan for Cumbria 2016-20 and Vision 2025.

Following internal and external consultation in 2018, Chief Officer Group approved the recruitment of three Collision Reduction Officers (one per territorial policing area), with funding via the Safety Camera Partnership. The Business Proposal clearly sets out the agreed responsibilities and expected benefits of the Collision Reduction Officer role. It also includes an intention to review the proof of concept proposal on an annual basis.

Collision Reduction Officer responsibilities include the co-ordination of Casualty Reduction and Safer Highways Group (CRASH) meeting actions with partners to solve road safety issues, the development of local community speed watch schemes, the planning and facilitation of road safety education and enforcement events and the deployment of speed indication devices and traffic data units. The focus is on killed and seriously injured (KSI) priority locations, areas of community concern and disrupting the use of vehicles for criminal and anti-social behaviour.

Audit Approach

Audit Objectives and Methodology

Compliance with the mandatory Public Sector Internal Audit Standards requires that internal audit activity evaluates the exposures to risks relating to the organisation's governance, operations and information systems. A risk-based audit approach has been applied which aligns to the five key audit control objectives. Detailed findings and recommendations are set out within the Management Action Plan.

Audit Scope and Limitations

The Audit Scope was agreed with management prior to the commencement of this audit review. The Client Sponsor for this review was Rob O'Connor (T/Chief Superintendent). The agreed scope of the audit was to provide assurance over management's arrangements for governance, risk management and internal control around the arrangements for delivering collision reduction activity and the governance, co-ordination and monitoring of this.

There were no instances whereby the audit work undertaken was impaired by the availability of information.

Assurance Opinion

Each audit review is given an assurance opinion, and this provides Joint Audit Committee and Officers with an independent assessment of the overall level of control and potential impact of any identified system weaknesses. There are 4 levels of assurance opinion which may be applied. The definition for each level is explained in **Appendix A.**

From the areas examined and tested as part of this audit review, we consider the current controls operating within Collision Reduction provide **Reasonable Assurance**.

Note: as audit work is restricted by the areas identified in the Audit Scope and is primarily sample based, full coverage of the system and complete assurance cannot be given to an audit area.

Summary of Audit Findings and Recommendations

Controls were operating effectively in the following areas:
- There is an approved Business Case that outlines the requirements of Collision Reduction Officers, the benefits they will deliver and how they will contribute to strategic policing priorities.
- Arrangements are in place to provide clear direction and oversight of road safety at a senior level through regular reporting to the Force Tasking and Co-ordination Group chaired by the Assistant Chief Constable.

- Collision Reduction Officers receive formal road safety training to allow them, as trainers, to deliver specific courses to Police Officers and PCSOs across the force in order to increase capacity in areas such as the use of drug wipes and intoxiliser equipment.
- Collison Reduction Officers co-ordinate CRASH meetings with partners and play a pivotal role in the multi-agency problem solving process around road safety issues. The development of strong working relationships with partners has enhanced this process.
- Risks associated with road safety are discussed and assessed at CRASH meetings to determine priorities and agree appropriate actions.
- The team is involved in regional road safety groups, participates in regional and national road safety events, has incorporated HMICFRS recommendations around road safety in the Cumbria Constabulary Improvement Plan (CCIP) and has systems in place to capture community concerns and issues around road safety. This helps the team to stay abreast of, and understand, national guidance, best practice and requirements at a local level.
- The Collision Reduction Officers meet on a regular basis to discuss issues, share best practice, highlight new approaches and generally ensure consistency across the team.

The recommendations arising from this review can be summarised as follows:

High	Medium	Advisory	Total
0	3	1	4

The three levels of audit recommendation are defined in **Appendix A**.

Areas for development: Improvements in the following areas are necessary in order to strengthen existing control arrangements:

High Priority Issues: None identified.

Medium Priority Issues:
- An annual review of the Collision Reduction Officer concept model has not been undertaken in accordance with the original Business Proposal.

- Collison Reduction Officer reporting lines and responsibilities have changed since the original proposal was approved by chief officers. The changes have been agreed and communicated on an informal basis.
- Performance management arrangements do not highlight issues in a clear and effective manner for informed management action.

Advisory issues:
- Cumbria Constabulary's road safety events and campaigns calendar is not synchronised across all partners.
- Feedback is not actively sought following road safety events, campaigns and operations to inform improvement activity.

Assistant Chief Constable Comments

I am very grateful for a comprehensive piece of work on this matter.
I aware of the actions the Constabulary has signed up and have arrangements in place to monitor their implementation through the Business Improvement Unit and via the Force Tasking and Coordination Group.
I am satisfied that the actions identified by the relevant managers address the issues and risks identified within the audit to an acceptable level.
The report can now be finalised and reported to the March 2021 meeting of the Audit & Assurance Committee via the internal audit quarterly progress report.

Andrew Slattery
Assistant Chief Constable
10/11/2020

Management Action Plan

Medium Priority

Audit finding	Management response
Annual Review In November 2018 Chief Officer Group approved a business proposal to recruit three Collision Reduction Officers (CROs). The posts were to be funded on a short-term basis by the Cumbria Safety Camera Partnership and subject to review on an annual basis (the business proposal states that the review has also been requested by the Constabulary's County Council partners). An annual review was due to take place by April 2020. The review was intended to reflect on the CRO model as a new concept for Cumbria and report on the value of the model and realisation of benefits set out in the original business proposal (i.e. a proof of concept review). The review has not taken place. Internal Audit was informed that plans to undertake the review were frustrated by the COVID-19 outbreak as a number of activities to prove the model were delayed. As a proof of concept model there is a need to demonstrate that the work undertaken by the CROs reflects the requirements of the original business case, provides value for money and expected benefits have been realised. The partnership receives some funding via a cost recovery process linked to the National Driver Offender Retraining Scheme. It is	Agreed management action: The annual review will be undertaken in accordance with the original COG Business Case. It will cover the benefits of the CRO posts, measured qualitatively and quantitatively in line with original business case expectations. It will also include recommendations on the continued viability of the role and costed options considering the impact of a reduction in NDORS recharges on Safety Camera Partnership finances.

acknowledged that COVID-19 will have had an impact of the level of funding available through the partnership because there were fewer vehicles on the roads during the restrictions (with a reduced number of offences) and this reinforces the need for a timely review.	
Recommendation 1: An annual review should be taken, in accordance with the Collision Reduction Officer Business Proposal and shared with chief officers and the partnership.	
Risk exposure if not addressed: • Continued funding for Collision Reduction Officer posts is not secured. • Failure to deliver road safety improvements and contribute to strategic priorities (including those in the Police & Crime Plan). • Loss of trust in Cumbria Constabulary amongst partners.	**Responsible manager for implementing:** Chief Inspector – Operational Support **Date to be implemented:** 02/2021

Medium Priority

Audit finding	Management response
Accountability The CRO Business Proposal, CRO Business Case and CRO Job Description clarify the role and responsibilities of Collision Reduction Officers, structure and reporting lines. The audit review highlighted that both reporting lines and responsibilities have changed since the original proposal was approved by chief officers. The audit review identified that the changes have been made on an informal basis and knowledge and understanding of them is inconsistent.	Agreed management action: Following extensive consultation on the initial approved business case there's a need to obtain formal ratification for the informal changes made. This is due to the stakeholders involved and the financial considerations applied to the original case. As the timeliness

Internal Audit recognises the need for an agile and adaptable management approach that is responsive to changing circumstances and empowers managers to make changes within their areas of business. However, this needs to be balanced with complete transparency and clear communications around what is expected of individuals and what they will be held accountable for. There is a particular need to define these arrangements in areas of high staff turnover. There is an intention to undertake an annual review and progress the proof of concept model through the appropriate boards and up to chief officers in a formal manner. As part of this process the role and responsibilities of CROs and governance structure should be re-defined and communicated.	of recommendation 1 enables recommendation 2 to be incorporated within the overall review, then this is an appropriate means of formalising any change in CRO responsibilities or governance arrangements (in the event of the CRO role continuing). Governance arrangements will be communicated post review.
Recommendation 2: CRO responsibilities and governance arrangements should be re-defined and formally communicated to those concerned.	
Risk exposure if not addressed: • Inefficiency, inconsistency and misunderstandings due to a lack of clarity around responsibilities. • Poor performance because individuals are unclear about management expectations / what they will be held accountable for.	**Responsible manager for implementing:** Chief Inspector – Operational Support **Date to be implemented:** 02/2021

Medium Priority

Audit finding	Management response
Performance Management Robust performance management arrangements for the CRO model were clearly set out, from the start, in formal documents. The CRO Business Proposal included a number of key benefits to be realised so that achievement could be reported as part of the annual review. The CRO Business Case incorporated a template for monthly key performance indicator (KPI) reporting, structured around key areas of business / operations to clearly align CRO activity to the achievement of corporate objectives and better demonstrate the contribution made. The KPIs included Killed and Seriously Injured (KSI) and vehicle borne anti-social behaviour (ASB) figures, thus linking to two of the expected benefits in the original Business Proposal. This data can be used to help demonstrate whether the expected benefits are being achieved as part of the annual review to be undertaken. Management have recognised the need to develop and document their arrangements to plan, monitor and manage CRO activity. These arrangements were formally captured in the CRO Business Plan as development actions with target dates for progress monitoring. Internal audit testing highlighted a number of issues around performance monitoring, management and reporting: -	Agreed management action: The performance contributions of the CRO's, as defined within the KPI document and Business Case will be included as an appendix to the aforementioned recommendation 1 and 2 for the annual review. The review will incorporate: - - consideration of performance expectations and reporting requirements, both qualitative and quantitative, with a focus upon service delivery improvements (road safety measured by perception and collision reduction; overall road safety reduction; confidence and satisfaction, dependent upon the reporting frequency post COVID-19). - development of a manageable performance reporting template which

KPIs

The KPIs referred to in the Business plan are numerous and in most cases are a total figure to be calculated e.g. number of vehicles seized, number of fatal road traffic collisions. Whilst informative, figures alone do not give a measure of performance and do not lend themselves to progress monitoring and tracking whether agreed benefits are being realised.

There is a need to determine key areas where performance information is required so that realistic targets / goals can be developed to measure performance against on a regular basis and compare to previous periods. Any system should clearly highlight exceptions (e.g. RAG rating) for management attention.

KPI Reporting

The CROs maintain information on activities they undertake and KPI figures in a spreadsheet that is submitted to management for review on a monthly basis. The information is collated and used for reporting to senior management. A KPI reporting document produced for management for the period January to July 2020 differs in format and content to the template within the Business Plan. It isn't framed around key areas of business and whilst it includes figures, they are very much embedded into lots of narrative. The report demonstrates the level and nature of activity undertaken by the CROs, but actual performance is lost within the text that spans 13 pages. A slicker, more focussed monitoring report, highlighting key activity and performance on an exception basis would be more effective for performance management purposes.

Kelvin App

At the time of the audit review the CROs were trialling the submission of performance data via an application on their Kelvin devices (electronic police notebooks) on a daily basis.

focusses upon key activity undertaken, to be provided to an agreed governance meeting (TCG; SLT; Ops).

- evaluation of the performance recording requirements of the CRO's (specifically in relation to the usability of the Kelvin App).

Feedback received at the time of the audit review raised questions around the efficiency of a daily routine, the suitability of an application that was developed for another team and arrangements for extracting the data and converting it into meaningful management information.

The audit review highlights a need for management to reconsider the current performance reporting arrangements and set out their expectations going forwards. These should include key areas of focus, performance goals / aspirations, data collection methods, frequency of reporting and report format and length. Consideration should be made of the style of the monthly CRASH report presented to Force Tasking and Co-ordination Group. This uses infographics and narrative to report on activity and performance whilst linking to the expected benefits set out in the original Business proposal.

Recommendation 3:
Management should define their expectations regarding performance management and update arrangements accordingly.

Risk exposure if not addressed:	Responsible manager for implementing:
• Failure to achieve strategic objectives.	Chief Inspector – Operational Support
• Flawed decision making due to poor quality management information.	Date to be implemented:
• Loss of trust in Cumbria Police amongst partners due to inefficient use of partnership funding.	02/2021

Advisory issue

Audit Finding	Management response
Campaigns & Events Calendars CRO activity is very much determined by the calendar of road safety events and campaigns e.g. June and December drink driving campaigns. The Cumbria Police calendar reflects the national police calendar and efforts have been made to link into the Fire Service calendar too. However, discussions throughout the audit review have highlighted a lack of synchronicity with the calendars of some other partners such as Cumbria County Council. There is a recognition that this area needs to be addressed to improve the co-ordination of road safety activity, impact and efficiency. Customer Feedback Arrangements are not currently in place to proactively seek feedback from communities, stakeholders and partners following road safety activities, operations and specific events. However, feedback is occasionally received via Facebook and Twitter comments, and this was evidenced as part of the audit review. Feedback could help to demonstrate the impact road safety activities have on individuals and the contribution CROs make to keeping the people of Cumbria safe. It can also help inform changes and improvements.	Agreed management action: Make and evidence efforts to coordinate planning calendars across all interested partners and CRASH stakeholders. Undertake consultation with a view to measuring success (or otherwise) where geographically specific operations or events have been undertaken.
Recommendation 4:	

a) Action should be taken to synchronise road safety event and campaign calendars across partner organisations. b) Feedback should be sought to identify any learning that can be taken forward as part of a commitment to continuous improvement and to inform the annual review process.	
Risk exposure if not addressed: • Inefficiency and reduced impact because opportunities are not maximised for joint road safety activity with partners. • Failure to identify shortcomings in road safety events, campaigns and operations. • Opportunities not taken to make improvements.	**Responsible manager for implementing:** Chief Inspector – Operational Support **Date to be implemented:** 02/2021

Appendix A

Audit Assurance Opinions

There are four levels of assurance used, these are defined as follows:

Assurance Level	Definition
Substantial	Sound frameworks of governance, risk management and internal control are in place and are operating effectively. Recommendations, if any, will typically be no greater than advisory.
Reasonable	Frameworks of governance, risk management and internal control are generally sound with some opportunities to further develop the frameworks or compliance with them. Recommendations will typically be no greater than medium priority.
Partial	Weaknesses in the frameworks of governance, risk management and/or internal control have been identified or there are areas of non-compliance with the established control framework which place the achievement of system / service objectives at risk. Recommendations will typically include high and medium priority issues.
Limited	There are significant gaps in the governance, risk management and/or internal control frameworks or there are major lapses in compliance with the control framework that place the achievement of system / service objectives at significant risk. Recommendations will include high priority issues.

Grading of Audit Recommendations

Audit recommendations are graded in terms of their priority and risk exposure if the issue identified was to remain unaddressed. There are three levels of audit recommendations used; high, medium and advisory, the definitions of which are explained below:

Grading	Definition
High	A recommendation to address a significant gap in governance, risk management or internal control frameworks or to address significant non-compliance with controls in place.
Medium	A recommendation to address a gap in governance, risk management or internal control frameworks or to address aspects of non-compliance with controls in place.
Advisory	A recommendation to further strengthen governance, risk management or internal control frameworks or to improve compliance with existing controls.