



Cumbria Shared Internal Audit Service

Internal Audit report for Cumbria Constabulary

Audit of the COVID-19 Response

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Audit Report Distribution

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Audit Committee:	The Joint Audit Committee which is due to be held on 16 th March 2022 will receive the report.

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Executive Summary

Background

This report summarises the findings from an audit of the Constabulary's Covid-19 Response. This was a planned audit assignment which was undertaken in accordance with the 2021/22 Audit Plan.

The Covid-19 pandemic presented a period of unprecedented change and the need for the Constabulary to manage difficult circumstances and complex risks. The policing world changed during this period, and it was important for the Constabulary to respond appropriately, move towards recovery and renewal and continue to support the delivery of objectives in the Police and Crime Plan for Cumbria 2016-20 and Vision 2025.

The Constabulary responded to the Covid-19 pandemic through a gold, silver, bronze command and control structure. This is the established framework for emergency services to respond to major incidents. The response was named 'Operation Lectern' and fed into the Cumbria wide multi-agency command structure of the Local Resilience Forum.

A Coronavirus Business Continuity Plan was developed to support the Constabulary to put threat mitigation measures in place to protect critical services. An Operation Lectern Action Plan was created to capture and manage actions agreed to mitigate the risks presented by Covid-19 and respond effectively.

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 Jonny Blackwell (T/Assistant Chief Constable). The agreed scope of the audit was to provide assurance over management's arrangements for governance, risk management and internal control around the following:

- Structures in place to respond to Covid-19 with a specific focus on governance and risk management
- Business Continuity Planning
- Arrangements to equip and support officers to apply Covid-19 Regulations
- Staff communications during the pandemic

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 around the Covid-19 Response provide **Substantial Assurance**.

This opinion recognises the level of controls in place and the notable strengths, as set out below. The Covid-19 pandemic made it necessary for the Constabulary to progress business continuity arrangements at an unprecedented pace and scale, under constant public scrutiny so that they could continue to provide effective policing services to the people of Cumbria.

An operational policing response and command structure was applied to manage the incident, taking decisions, and making changes at speed. This inevitably meant that in some instances, established controls were not applied as fully as would be expected under normal circumstances. For example, the Government announcements about new or amended regulations were frequent, and often at short notice, which presented a need to produce guidance and brief staff, sometimes within hours and at times without going through the usual approval process. Similarly, there was a need to produce a Business Continuity Plan quickly that would consider the longevity of the Covid-19 pandemic, and its wide ranging implications, and then update the plan to reflect changes as the virus evolved. Formal approval was not always secured and evidenced for the various versions of the plan. However, in the context of a fast-moving pandemic and constant public scrutiny this does not appear unreasonable in the circumstances, and the Deputy Chief Constable had oversight of what was happening.

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:

Structures in place to respond to COVID-19:

Governance

- The governance structure provided clear lines of command and allowed for key decisions to be made in a fast-changing environment due to the frequency of meetings and seniority of staff involved in the meetings. Key decisions were captured in decision logs for transparency and reference.
- The Covid-19 governance structure included senior officers, directors and heads of department from across the organisation and ensured representation across the various functions, both operational and support.
- The governance structure allowed for effective information flow between the command levels within the force but also externally through representation on multi-agency Covid-19 groups.

Risk management

- An Operation Lectern Action Plan captures actions to mitigate the key risk areas and the actions are clearly allocated, with deadlines and regular progress updates. The system provides for effective monitoring of actions with status updates in table or graphical format and at summary or detailed level depending on requirements. At the time of the audit review there were over 1,200 actions allocated to more than 200 individual action owners, with only 10 actions incomplete. This demonstrates the level of quality assurance and monitoring arrangements in place to oversee plan progress.

Business Continuity Planning:

- The Coronavirus Business Continuity Plan was prepared with reference to national and local guidance and learning from previous business continuity events (such as significant flooding) to improve organisational resilience.

- The Coronavirus Business Continuity Plan was updated and adapted as the threat in Cumbria evolved, different variants emerged, and a pattern of Covid-19 waves developed, to ensure an appropriate and proportionate response was maintained. Examples of this include changing the frequency of operation lectern silver and gold meetings and staff briefings, reconfiguring the workspace and transferring staff to alternative sites.
- It is clear that Cumbria Constabulary was at the forefront of police Covid-19 response planning, developing and building on much of the guidance material distributed nationally via the National Police Chiefs' Council (NPCC) and providing assistance at an international level through the Joint International Police Hub. Examples include providing a copy of Cumbria Constabulary's Coronavirus Plan to the Ghana Police Service.
- Opportunities have been taken to review the Constabulary's response to Covid-19 and share learning. The chair of Operation Lectern Silver meetings and the Chief Superintendent Gold support (Strategic Advisor to UK NPCC Civil Contingencies Lead) prepared a presentation entitled 'Business Continuity Management, Covid-19 and Lessons Learned to Improve Organisational Resilience'. The presentation was delivered to the Nigerian Law Enforcement Community and included Cumbria's response to the UK's national experience of policing in a pandemic (HMICFRS Review). The Chief Constable received a letter of thanks from the Nigerian High Commissioner for this support.

Staff communications during the pandemic

- A Covid-19 Information Cell was quickly established to receive national communications via 'Operation Talla', and other sources, for review by the appropriate professional leads and timely dissemination across the organisation. Care was taken to choose the most appropriate communication methods and styles, provide clarity and consistency and reduce information overload wherever possible. Communications were concise, but provided hyperlinks and embedded documents for readers to access additional, and more detailed information if required.
- A Covid-19 SharePoint site was established to provide staff with easy access to all communications and supporting information (guidance, bulletins, procedures, regulations, forms etc.). A Yammer channel was also developed on the SharePoint site to share and reinforce information, promote positive news stories and generally support staff.
- Operation Lectern Silver and Gold meetings included standard agenda items for staff communications and both meetings included senior representation from the Marketing and Communications Team. Minutes show that the Deputy Chief Constable was involved in discussions and decision making around staff communications and participated in staff video messages.

Arrangements to equip and support officers to apply Covid-19 Regulations:

- The constabulary made wider and improved use of technology as working practices were forced to adjust. Examples include moving from traditional spreadsheets for tracking actions towards better utilisation of Microsoft technology, the provision of equipment to support agile working and better use of management information software to provide more timely data and analysis (e.g. staff absence, Covid-19 test results, and action plan progress).
- Good arrangements were in place to equip and support officers to apply Covid-19 Regulations in practice. Regulations received from Operation Talla and the College of Policing were translated into clear procedures in a local format, communicating exactly what was expected of staff in different roles. Further steps were taken to guide officers through Covid-19 breaches utilising the 4E's Strategy (Engage, Explain, Encourage and Enforce) with the innovative development of a 4E's App. The application provided forms for officers to complete when engaging with individuals breaching Covid-19 regulations and ensured all relevant information was captured. The process reinforced the Constabulary's commitment to maintaining community cohesion whilst enforcing regulations.

There are no audit recommendations arising from this audit review.

Deputy Chief Constable Comments

I note the substantial assurance opinion. This was a difficult policing and management challenge for all involved, and required the whole organisation to demonstrate flexibility and agility in a very dynamic environment where the 'ask' of government was ever-changing. The officers and staff did this very effectively, demonstrating their very best in doing so. I am pleased that these efforts have been recognised on the inspection.

DCC M Webster
25th Feb 2022

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.