



Police and Crime Commissioner for Cumbria and Cumbria Constabulary

Assurance Review of Force - Personal Safety Training

2022/23

September 2022

Executive Summary

OVERALL ASSESSMENT



ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

There is a risk that officers will use force on members of the public while being out of date with their mandatory Personal Safety Training (PST) and Job-Related Fitness Test (JRFT).

SCOPE

The review considered the delivery of Personal Safety Training (PST) in accordance with the College of Policing Guidance on PST. The review also assessed the actions taken to address the reduced training provided during the pandemic to bring training delivery back to the expected level.

KEY STRATEGIC FINDINGS



Approximately 500 officers have not completed their personal safety training (PST) within the last 12 months. This includes circa 150 who are currently recorded by Occupational Health as unfit to undertake the training.



175 staff with overdue training have not yet been booked onto a future course.



Resource co-ordinating meetings monitor the progress made in completing actions undertaken that are aimed at reducing the number of staff with overdue training.

GOOD PRACTICE IDENTIFIED



The police job-related fitness test (JRFT), which officers are required to complete prior to undertaking any personal safety training, is undertaken on the first day of the PST course.

ACTION POINTS

Urgent	Important	Routine	Operational
0	2	0	0

Assurance - Key Findings and Management Action Plan (MAP)

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
1	Directed	<p>A spreadsheet provided by the Specialist Training Manager contained the expiry dates of individual staff personal safety training (PST) courses. This highlighted where the PST had expired and showed that 483 staff had expired PST (including 146 where occupation health had noted that they were unfit to undertake the training) – a net position of 337 eligible members of staff overdue.</p> <p>Analysis of these staff showed that 175 did not have a future course date booked. This represents approximately 52% of the staff with overdue training. The majority of the remaining staff were booked onto courses in July and August 2022.</p> <p>An exercise should be undertaken to prioritise those officers with expired training to ensure that courses are booked at the earliest opportunity. This will assist in providing assurance to Workforce Bronze that the force will achieve a fully compliant position with regards to PST training.</p>	Course dates be booked without delay for all officers with expired PST.	2	<p><i>Courses are scheduled up to the end of March 2023, and a potential training plan for 2023/24 has been produced, pending approval.</i></p> <p><i>There is course availability for all officers that have expired or due to expire until the end of March 2023.</i></p> <p><i>Resource Coordinators have recently been restructured to have more oversight on course bookings. However, they have recently prioritised changes to Crown and force restructure due to Government reform. Officers shift patterns have also been reviewed and changed. This has also taken priority over PST bookings.</i></p> <p><i>Once all the changes to Crown have been made due to LGR and change in shift pattern, Resource Coordinators will be able to look to book officers on to courses that are currently out of date, or due to expire. Regular L&D and Resource Coordination meetings will review the list of Officers with expired skills.</i></p>	<p><i>To be raised and actioned at the next L&D and Resource Coordination meeting 16th September 2022</i></p>	C/Insp Charlotte Nutter

PRIORITY GRADINGS

1 **URGENT** Fundamental control issue on which action should be taken immediately.

2 **IMPORTANT** Control issue on which action should be taken at the earliest opportunity.

3 **ROUTINE** Control issue on which action should be taken.

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
2	Directed	Although course dates are held within Chronicle, the spreadsheet provided and used by the Specialist Training Manager did not contain the date that the training expired. It was therefore not possible to establish how overdue officers' PST was. This data should be utilised to prioritise those whose PST course expired first.	The expiry date of PST courses be logged within the spreadsheet to enable those officers with the oldest course dates to be identified and prioritised when booking onto courses.	2	<p><i>Chronicle Manager currently provides a list to duties of when officer's skills will expire so they can be booked on the course in a timely manner.</i></p> <p><i>Chronicle is able to produce a list of all police officers and their PST expiry date. At present Chronicle will not show how long an officer's skills have been expired for.</i></p> <p><i>Determining a list of officer's priority is multi-faceted depending on role, specialist skills, operational commitments and various other aspects. These need to be considered when booking courses.</i></p> <p><i>Streamlining the system so there are not as many spreadsheets for Resource Coordinators to look at will simplify the process.</i></p> <p><i>From 5th September, when the force structure changes, the current spreadsheet will need revising to match the new structure.</i></p> <p><i>L&D are looking to produce Teams solution to simplify the management of expiry dates.</i></p>	To be raised and actioned at the next L&D and Resource Coordination meeting 16 th September 2022	C/Insp Charlotte Nutter

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Operational - Effectiveness Matter (OEM) Action Plan

Ref	Risk Area	Finding	Suggested Action	Management Comments
No operational effectiveness matters were identified.				

ADVISORY NOTE

Operational Effectiveness Matters need to be considered as part of management review of procedures.

Findings



Directed Risk:

Failure to properly direct the service to ensure compliance with the requirements of the organisation.

Ref	Expected Key Risk Mitigation	Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.	In place	-	-
RM	Risk Mitigation The documented process aligns with the mitigating arrangements set out in the corporate risk register.	In place	-	-
C	Compliance Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	Partially in place	1 & 2	-

Other Findings



There had previously been no forward planning of PST courses with these being booked at relatively short notice, albeit allowing six weeks' notice in order for officers to ensure that their physical condition was sufficient to pass the fitness test.

The new arrangements involve staff being booked onto a course 12/13 months after taking their current course.

Course dates are created by the Specialist Training Manager and provided to the Chronicle Team who book officers onto the course. The PST course dates booked will also be entered onto Crown, which will enable officers' duties to be scheduled with the knowledge of who will be unavailable for duty due to attending a course. This should alleviate staff not being able to attend a course due to operational needs.



Prior to undertaking any personal safety training (PST), officers are required to complete and pass the police job-related fitness test (JRFT). This is to ensure that officers have a minimum level of fitness to be able to undertake the PST. Discussions with the Specialist Training Manager identified that the fitness test is scheduled to be undertaken on the first day of the PST and has a failure rate of approximately 1%

Other Findings



The Learning and Development Risk Register contains the following entry: "There is a risk that officers will use force on members of the public while being out of date with their mandatory Personal Safety Training (PST) and Job-Related Fitness Test (JRFT), caused by training being postponed due to the Covid pandemic resulting in officers authorisation expiring and reputational risk to the Constabulary". The latest update relating to mitigating actions, dated February 2022, records that PST delegate numbers have been increased from 12 to 20 to try and reduce the numbers of officers out of authorisation and the current number of officers out of authorisation was 398.

It was noted that an action recorded within the Risk Register was to "take a risk-based approach to prioritising training with response officers being the highest priority". It was established that this is a manual process carried out by the Resource Co-ordinators who take into consideration the skills and specialisms held by officers when booking in course dates.



Delivery Risk:

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation	Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
PM	Performance Monitoring There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.	In place	-	-
S	Sustainability The impact on the organisation's sustainability agenda has been considered.	Out of scope	-	-
R	Resilience Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.	In place	-	-

Other Findings



Resource co-ordinating meetings are held approximately every two weeks in order to monitor the progress made in completing actions undertaken that are aimed at reducing the number of staff with overdue training. Attendees at these meetings include the Specialist Training Manager, the Resource Coordinator Team Supervisor, Chronicle Manager, Strategic Development Manager, Inspector in charge of resource coordination, the Superintendent managing the Police Office shift review and the Chief Inspector (Head of People).

A review of the minutes/notes of the initial meeting in February 2022 and subsequent meetings in April and May showed that subjects discussed included:

- Planning for the next 12-18 months and to establish the aims and purpose of the group (for information the define purpose of the group is to "devise a co-ordinated and tactical approach to create and deliver a training calendar planned on duties with a 12-month advance");
- How the process currently works including what systems are used and how training notifications are communicated;
- Ensuring that the disruption to training is minimised by the effect of external events such as the Appleby Horse Fair and the Commonwealth Games; and
- The option to co-ordinate PST with first aid training.



The latest data available from Chronicle showed that there are 540 Officers with out of date PST (from a total of 1,338 officers), however this includes 257 that are not eligible for PST due to a restriction or on recuperative duties. The adjusted figure is therefore 283/1,081 or approximately 26% out of date. The Specialist Training Manager stated that prior to the Covid-19 pandemic, approximately 90% of officers had completed their PST. For information, an action contained within the Risk Register is for officers that are exempt from JRFT or PST due to being either long- or short-term injury/restriction to be removed from the list of expired officers. This cannot be recorded within Chronicle and therefore the performance figures have to be manually adjusted.

Other Findings



At the meeting undertaken in February 2022 it was agreed that the main reason for staff not attending their booked PST course was 'operational demand'. A discussion took place at the meeting regarding when this is acceptable and what elements are cultural. It was also stated that "there was an agreed protocol that officers needed their Chief Inspector's permission to miss PST. This needs to be re-invigorated and agreed as a process across the Force". Discussions with the Specialist Training Manager identified that, with the exception of some officers with specific skills, for example firearms or Taser, who would lose their skill if they did not complete the PST, although a list of officers who have not turning up for their course is discussed at the Workforce Bronze meetings, there is currently no consequence to an officer for failing to ensure that their PST remains in date.



The Specialist Training Manager stated that although up to 18 places were previously available for each PST course, only around 12 officers actually attend. Although data to substantiate this assertion could not be obtained, this would result in one additional course having to be booked for each three previously taking place (to accommodate the six non-attendees for each course). Courses are now, however, planned on the basis that 12 attend.

EXPLANATORY INFORMATION

Appendix A

Scope and Limitations of the Review

- The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

Disclaimer

- The matters raised in this report are only those that came to the attention of the auditor during the course of the review, and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Effectiveness of arrangements

- The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

Assurance Assessment

- The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

Acknowledgement

- We would like to thank staff for their co-operation and assistance during the course of our work.

Release of Report

- The table below sets out the history of this report.

Stage	Issued	Response Received
Audit Planning Memorandum:	17 th June 2022	17 th June 2022
Draft Report:	15 th August 2022	13 th September 2022
Final Report:	13 th September 2022	

AUDIT PLANNING MEMORANDUM

Appendix B

Client:	PCC Cumbria & Cumbria Constabulary		
Review:	Force – Personal Safety Training		
Type of Review:	Assurance	Audit Lead:	David Robinson

Outline scope (per Annual Plan):	The review will consider the delivery of Personal Safety Training (PST) in accordance with the College of Policing Guidance on PST. The review will also assess the actions taken to address the reduced training provided during the pandemic to bring training delivery back to the expected level.		
Detailed scope will consider:	<p>Directed</p> <p>Governance Framework: There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.</p> <p>Risk Mitigation: The documented process aligns with the mitigating arrangements set out in the corporate risk register.</p> <p>Compliance: Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.</p>	<p>Delivery</p> <p>Performance monitoring: There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.</p> <p>Sustainability: The impact on the organisation's sustainability agenda has been considered.</p> <p>Resilience: Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.</p>	

Planned Start Date:	20/06/2022	Exit Meeting Date:	19/07/2022	Exit Meeting to be held with:	Specialist Training Team Manager
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SELF ASSESSMENT RESPONSE

Matters over the previous 12 months relating to activity to be reviewed	Y/N (if Y then please provide brief details separately)
Has there been any reduction in the effectiveness of the internal controls due to staff absences through sickness and/or vacancies etc?	N
Have there been any breakdowns in the internal controls resulting in disciplinary action or similar?	N
Have there been any significant changes to the process?	N
Are there any particular matters/periods of time you would like the review to consider?	N

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