| Committee(s):                            |                          | Item no.  |        |
|--|--------------------------|-----------|--------|
| Performance & Resource Management        | 5 <sup>th</sup> Septembe |           |        |
| Sub-Committee (Police Committee)         |                          |           |        |
| Subject:                                 | Public                   |           |        |
| Internal Audit Update Report Financial Y |                          |           |        |
| (Quarter 2)                              |                          |           |        |
| Report of:                               |                          | For Infor | mation |
| The Chamberlain                          |                          |           |        |

## **Summary**

- 1. The Audit and Risk Management Committee Members, in consultation with the Chairman of the Police Committee, agreed that the Police Performance & Resource Management sub-committee should be provided with an internal audit update report on activity for the City of London Police (CoLP). It was agreed by Members that these 6 monthly update reports should also be copied to the Audit and Risk Management Committee Members.
- 2. This is the first update report made to your sub-committee and contains details of the Internal Audit Plan for the current financial year ending 31<sup>st</sup> March 2013, (Appendix 1), together with the 5 year strategic Internal Audit Plan for the CoLP 2012/2017 (Appendix 2).
- 3. No significant control issues have been identified so far by Internal Audit work completed in the first two quarters of 2012/13 (period ending 30<sup>th</sup> September 2012). A review of the CoLP compliance with Her Majesty's Government (HMG) Information Assurance Maturity Model (IAMM) was finalised in the first quarter of 2012/13 (period ended 30<sup>th</sup> June 2012), the main work for these reviews was undertaken in 2011/12. The fieldwork for a review of the CoLP Value for Money Initiatives has recently been completed and the draft report issued to the Commissioner. Other work completed to date includes a small review of Cash Collection & Banking and follow-up reviews of Business Continuity Planning and CoLP administration of bank accounts holding defendants' funds. In addition, the Commissioner requested that Internal Audit examined details of an allegation made by a former employee concerning compliance with Standing Orders related to the Engagement of External Consultants.

#### **Recommendations**

• That this report be noted.

#### **Main Report**

## **Background**

4. Update reports on Internal Audit activity within the CoLP will be presented to the Performance & Resource Sub Committee on a 6 monthly basis following agreement between the Audit and Risk Management Committee and the Chairman of the Police Committee. This report includes details of the progress made in completing the 2012/13 Internal Audit Plan and also provides a schedule of the Internal Audit Plan 2012/13 which was discussed and agreed with the Director of Corporate Services (Appendix 1). It also includes details of the five years Strategic Internal Audit Plan for the City Police (Appendix 2).

Summary of Audit work undertaken during 2012/13 HMG Information Assurance Maturity Model (5 days)

## Assurance Level Green/Substantial

- 5. An exercise was conducted during 2011/2012 at the request of CoLP to establish how compliant the City of London (CoL) is as a 3<sup>rd</sup> Party Supplier under the HMG Information Assurance Maturity Model (IAMM).
- 6. The IAMM questionnaire introduced a number of concepts and highly specific controls which the CoL has not previously encountered. An evidence based approach was used to establish the compliance level for each control listed, often the specific control was not in place as stated, but an alternative control exists which addresses the risk presented. For example strong encryption is enforced on portable and removable devices, and the government 'Protecting Information' training is conducted.
- 7. It is Internal Audit's view that the information control environment within CoL is robust although there is room for some improvement. There is currently no protective marking scheme within CoLP. It has been agreed with the Commissioner that the HMG marking scheme or an alternative will be investigated and considered for implementation. The review made five observations to the CoLP Information Officer.

## **City Police Value for Money Initiatives (City First Programme) (10 days)**

## Assurance Level Green/Substantial

8. The primary purpose of this review was to examine the work undertaken by the CoLP City First Programme Project Team. It was established that a thorough and comprehensive exercise has been undertaken by the Team. Work undertaken in producing the Revised Policing structure for the CoLP included a number of work streams assessing the requirements of the Force for effective delivery of the Policing Plan, together with the appropriate Support Services. A detailed assessment of Emerging and Future Threats was undertaken, a benchmarking exercise for support services was commissioned from an external agency and value for money assessments of each CoLP service completed as part of the project. The draft report for this Internal Audit exercise is currently being considered by the Commissioner, there were no recommendations made as a result of this review.

## **City Police Cash Income (3 days)**

## Assurance Level Green/Substantial 🥥

- 9. This minor spot check review included an examination of a sample of transactions for income collection, recording, security and banking and division of duties at Bishopsgate, Wood Street and Snow Hill Police Stations.
- 10. Sample testing established that there are satisfactory controls over the collection, safe custody and banking of income at Front Desk sites with an adequate division of duties. There is, however, a weakness in controls over recording income at Bishopsgate and Snow Hill Police Stations where there are no independent records being maintained. In addition, it is noted that receipts to verify income collections at Snow Hill were not being provided by Shared Services who are based on site. There is also a weakness concerning the safe key at Wood Street which needs to be held by a member of staff during the day and over the banking of a small amount of income taken from the sale of personal attack alarms at Bishopsgate which needs to be undertaken on a more regular basis. All four green recommendations made as a result of weaknesses identified have been agreed with the Commissioner and will be implemented by 30th September 2012.

## Investigation of a complaint made by a former civilian support officer

## **Assurance Level Green/Substantial**

- 11.An examination of the information supplied concerning the appointment of Pareto Management Ltd. as a consultant was undertaken by Internal Audit. It is understood that the officer has alleged that this appointment was not made in accordance with the City of London Corporation's (the City's) Financial Regulations.
- 12.On the basis of the documentation provided and interrogation of CBIS Accounts Payable, it has been determined that the engagement of Pareto Management Ltd. to undertake the role of independent advisor and critical friend to the City First Programme was in accordance with the City's Financial Regulations. E-mail and memoranda correspondence examined by Internal Audit demonstrated an awareness of the requirements of Standing Order 49 as expressed within the City's Procurement Guidance, specifically, that consultant appointments with a contract value up to £50,000 are at the discretion of the Chief Officer. In this instance it is noted that the Commissioner approved the engagement of Pareto Management Ltd. and the value of the contract was within the £50,000 threshold required by Standing Order 49.

## **CoLP Business Continuity Planning – Follow-up exercise**

Summary of Current Position (20<sup>th</sup> August 2012)

| RAG    | Recommendations | Implemented | Partially   | Outstanding |
|--------|-----------------|-------------|-------------|-------------|
| Rating |                 |             | Implemented |             |
|        | 0               | 0           | 0           | 0           |
|        | 11              | 8           | 3           | 0           |
|        | 1               | 1           | 0           | 0           |
| Total  | 12              | 9           | 3           | 0           |

13.An on-going follow up exercise has been undertaken of the above audit to review progress in the implementation of recommendations. The review identified that of the twelve recommendations made, nine have been implemented. The partially implemented recommendations are discussed below.

# **Recommendations 6 & 7 (Partially Implemented)**

14. The Emergency Planning and Business Continuity Team (EPBCT) are reviewing departmental plans and reporting back to departments where

the relevant information has not been found together with deadline dates for plans to be reviewed again.

# **Recommendations 9 (Partially Implemented)**

- 15. The EPBCT state that it has not been possible to plan a major exercise because of commitments for The Queen's Jubilee Celebrations and Olympic Games in July 2012. There are, however, exercises scheduled following completion of the Olympic Games in September 2012.
- 16. It is understood that some resilience work has already begun in June 2012 with live testing of the e-mail system scheduled for August 2012. It has been agreed that the outcome of this test will be reported to Internal Audit to confirm full completion of this exercise.

## Bank Accounts for Defendants' Funds – Follow-up exercise

Summary of Current Position (20<sup>th</sup> August 2012)

| RAG         | Recommendations | Implemented | Partially   | Outstanding |
|-------------|-----------------|-------------|-------------|-------------|
| Rating      |                 |             | Implemented |             |
|             | 0               | 0           | 0           | 0           |
| $\triangle$ | 0               | 0           | 0           | 0           |
|             | 2               | 1           | 0           | 1           |
| Total       | 2               | 1           | 0           | 1           |

17. The outstanding recommendation relates to reconciling bank account balances to approved deposits and withdrawals. At the time of this follow-up review (May 2012) this task had not been undertaken since December 2011. It was agreed with the Interim Director of Finance that reconciliations would be brought up to date as soon as possible. The completion of this task will be reviewed again by Internal Audit before the end of September 2012.

#### Conclusion **②**



18.Good progress is being made in the completion of the 2012/12 Internal Audit Plan. There have been no major control weaknesses identified to date.

## **Appendices**

**Appendix 1: Schedule of Internal Audit Projects 2012/13** 

**Appendix 2: Five Year Strategic Audit Plan 2012/17** 

# **Contact:**

Jeremy Mullins, Audit Manager Telephone 020 7332 1279 Email: jeremy.mullins@cityoflondon.gov.uk

# **Schedule of Internal Audit Projects 2012/13**

| Full Reviews   |                 |                                 |                  |              | Recomn         | nendations     |       |
|--|-----------------|---------------------------------|------------------|--------------|----------------|----------------|-------|
| Project  | Planned<br>Days | Planned<br>Completion<br>Date   | Current<br>Stage | Total<br>Red | Total<br>Amber | Total<br>Green | Total |
| POLICE ICT SERVICE SUPPORT<br>CONTRACTS  | 10              | 30 <sup>th</sup> September 2012 | Planning         | -            | -              | -              | -     |
| The Force operate a variety of ICT service contracts to support the City's policing arrangements. Controls over the procurement of ICT support contracts will be examined.   |                 |                                 |                  |              |                |                |       |
| POLICE SUPPLIES AND SERVICES   | 20              | 31 <sup>st</sup> December 2012  | Not Started      | -            | -              | -              | -     |
| The City Police requires a wide range of items to support delivery of its policing plan. This review will examine the control of the procurement, payment and asset management aspects will be examined.   |                 |                                 |                  |              |                |                |       |
| POLICE FLEET MANAGEMENT VFM  | 10              | 31 <sup>st</sup> March<br>2013  | Not Started      | -            | -              | -              | -     |
| The City Police Force operates a diverse fleet of vehicles to enable a responsive policing presence within the square mile and beyond. Arrangements for the procurement, maintenance and usage of vehicles will be examined, including potential efficiency savings. |                 |                                 |                  |              |                |                |       |

| Full Reviews  |                 |                                    |                             | Recommendations |                |                |       |  |  |
|---|-----------------|------------------------------------|-----------------------------|-----------------|----------------|----------------|-------|--|--|
| Project   | Planned<br>Days | Planned<br>Completion<br>Date      | Current<br>Stage            | Total<br>Red    | Total<br>Amber | Total<br>Green | Total |  |  |
| VALUE FOR MONEY INTIAITIVES   | 5               | 30 <sup>th</sup> June 2012         | Draft Report<br>Issued      | 0               | 0              | 0              | 0     |  |  |
| In the current economic climate, City departments need to continuously identify expenditure savings and income generation opportunities. This review will examine ongoing efficiency savings against proposals introduced by the Commissioner.                                  |                 |                                    |                             |                 |                |                |       |  |  |
| POLICE COMPENSATION CLAIMS  | 20              | 31 <sup>st</sup> December 2012     | Planning                    | -               | -              | -              | -     |  |  |
| During the course of police operations there are inevitable incidents where innocent parties are inadvertently affected by police activity. The management of claims made against the Police including arrangements to mitigate the risk of claims being made will be examined. |                 |                                    |                             |                 |                |                |       |  |  |
| Spot Check Reviews Petty Cash   | 3               | 31st March                         | Not Started                 | -               | -              | -              | -     |  |  |
| Cash Income   | 3               | 2013<br>30 <sup>th</sup> June 2012 | Management<br>Letter issued | 0               | 0              | 3              | 3     |  |  |
| Property & Front Offices (All Police<br>Stations)   | 4               | 30 <sup>th</sup> September 2012    | Not Started                 | -               | -              | -              | -     |  |  |
| Police Officers' Allowances & Ad Hoc<br>Payments  | 5               | 30 <sup>th</sup> September 2012    | Planning                    | -               | -              | -              | -     |  |  |
| Interpreters Fees   | 5               | 31 <sup>st</sup> December 2012     | Not Started                 | -               | -              | -              | -     |  |  |

| Follow-up reviews   |             |     |       |       |       |     |       |       |       |             |
|---|-------------|-----|-------|-------|-------|-----|-------|-------|-------|-------------|
| Project Follow-up Date Recommendations Made Recommendations Implemented |             |     |       |       |       |     |       |       |       |             |
|   |             | Red | Amber | Green | Total | Red | Amber | Green | Total | Outstanding |
| <b>Business Continuity Planning</b>                                     | August 2012 | 0   | 11    | 1     | 12    | 0   | 8     | 1     | 9     | 3           |
| Defendants' Funds Bank A/c's  | June 2012   | 0   | 0     | 2     | 2     | 0   | 0     | 1     | 1     | 1           |
| Police Clothing Store   | Not Yet Due | 0   | 0     | 9     | 9     | -   | _     | -     | -     | -           |

# Five Year Strategic Audit Plan City of London Police

|   | Last    |         |         |         |         |         | 5 Year   |
|---|---------|---------|---------|---------|---------|---------|----------|
| FULL REVIEWS  | Audited | 2012/13 | 2013/14 | 2014/15 | 2015/16 | 2016/17 | Coverage |
| DEPARTMENTAL GOVERNANCE AND FIN.MAN (INC BUD            |         |         |         |         |         |         |          |
| CONTROL) PART CSA                                       | 2010.07 | 0       | 0       | 0       | 25      | 0       | 25       |
| POLICE ICT SERVICE SUPPORT CONTRACTS                    | NEW     | 10      | 0       | 0       | 0       | 0       | 10       |
| POLICE SUPPLIES AND SERVICES                            | 2007.01 | 20      | 0       | 0       | 0       | 0       | 20       |
| POLICE PREMISES RELATED EXPENDITURE                     | 2007.01 | 0       | 0       | 0       | 0       | 20      | 20       |
| POLICE USE OF THIRD PARTY PAYMENTS (INC                 |         |         |         |         |         |         |          |
| CONSULTANTS)  | 2007.11 | 0       | 20      | 0       | 0       | 0       | 20       |
| POLICE FLEET MANAGEMENT VFM                             | 2006.02 | 10      | 0       | 0       | 0       | 0       | 10       |
| POLICE FEES & CHARGES (inc income maximisation and debt |         |         |         |         |         |         |          |
| management)   | 2006.03 | 0       | 20      | 0       | 0       | 0       | 20       |
| POLICE BUSINESS CONTINUITY PLANNING                     | 2011.11 | 0       | 0       | 0       | 0       | 15      | 15       |
| POLICE CLOTHING STORE (INCL. COMP. SYSTEM)              | 2007.01 | 0       | 0       | 0       | 0       | 5       | 5        |
| POLICE BANK ACCOUNTS                                    | 2010.10 | 0       | 0       | 0       | 10      | 0       | 10       |
| POLICE GOVT GRANTS, OTHER GRANTS &                      |         |         |         |         |         |         |          |
| REIMBURSEMENTS (incl CJU)                               | 2010.10 | 0       | 0       | 0       | 10      | 0       | 10       |
| POLICE BERNARD MORGAN HOUSE VFM                         | 2010.08 | 0       | 0       | 15      | 0       | 0       | 15       |
| POLICE OVERTIME   | NEW     | 0       | 0       | 20      | 0       | 0       | 20       |
| VALUE FOR MONEY INTIAITIVES                             | NEW     | 5       | 5       | 5       | 8       | 6       | 29       |
| POLICE COMPENSATION CLAIMS                              | 2005.12 | 20      | 0       | 0       | 0       | 0       | 20       |
| POLICE SEIZED GOODS                                     |         | 0       | 5       | 0       | 5       | 0       | 10       |
| TOTAL MAN DAYS FULL REVIEWS                             |         | 65      | 45      | 40      | 53      | 46      | 249      |

| SPOT CHECKS REVIEWS  |    |    |    |    |    |     |
|--|----|----|----|----|----|-----|
| PETTY CASH   | 3  | 0  | 3  | 0  | 0  | 6   |
| CASH INCOME (incl. Unofficial funds at Snowhill, Accommodation (etc) | 3  | 0  | 3  | 0  | 0  | 6   |
| PROPERTY & FRONT OFFICES (ECD - 7, CP4 - 21 and CP6 - 21)            | 4  | 4  | 4  | 4  | 4  | 20  |
| PROCUREMENT PROCESS INC CREDITOR DEPTH TESTS                         | 0  | 5  | 0  | 5  | 0  | 10  |
| INFORMANTS FUND  | 0  | 0  | 10 | 0  | 5  | 15  |
| POLICE BANK ACCOUNTS   | 0  | 0  | 5  | 0  | 5  | 10  |
| BVPIs and LBVPIs CSA   | 0  | 3  | 0  | 3  | 0  | 6   |
| TRAVEL EXPENSES  | 0  | 5  | 0  | 5  | 0  | 10  |
| PRE EMPLOYMENT SCREENING   | 0  | 5  | 0  | 0  | 5  | 10  |
| RISK REGISTER MAINTENANCE CSA  | 0  | 0  | 0  | 0  | 5  | 5   |
| RECRUITMENT – CSA  | 0  | 3  | 0  | 0  | 0  | 3   |
| USE OF PROCUREMENT CARDS – CSA                                       | 0  | 10 | 0  | 10 | 0  | 20  |
| POLICE OFFICERS PENSIONS   | 0  | 0  | 10 | 0  | 10 | 20  |
| POLICE OFFICERS ALLOWANCES AND AD HOC PAYMENTS                       | 5  | 0  | 5  | 0  | 5  | 15  |
| INTERPRETERS FEES  | 5  | 0  | 5  | 0  | 0  | 10  |
| POLICE SEIZED GOODS  | 0  | 5  | 0  | 5  | 0  | 10  |
| TOTAL MAN DAYS SPOT CHECK REVIEWS                                    | 20 | 40 | 45 | 32 | 39 | 176 |
|  |    |    |    |    |    |     |
| TOTAL MAN DAYS   | 85 | 85 | 85 | 85 | 85 | 425 |