

Enquiries to: #JAC

Telephone: (01278) 646188

E-mail: JAC@avonandsomerset.pnn.police.uk

Date : February 2025

To: ALL MEMBERS OF THE JOINT AUDIT COMMITTEE

- i. David Daw (Chair), Zoe Rice, John Vanstone, James Madsen, Nassir Mahmood
- ii. Chief Constable (“CC”), CFO for CC and Relevant Officers
- iii. The Police & Crime Commissioner (“PCC”)
- iv. The CFO and CEO for the PCC
- v. External and Internal Auditors

Dear Member

NOTICE OF MEETING

You are invited to a meeting of the **Joint Audit Committee** to be held at Police and Fire HQ, Portishead, at **13:00** on **11 March 2025**.

Joint Audit Committee Members are invited to attend a pre-meeting at 10:00 and a Members Briefing session at 11:00, both also in person at Police and Fire HQ.

The agenda for the meeting is set out overleaf.

Yours sincerely

Vicky Ellis
Office of the Police and Crime Commissioner

INFORMATION ABOUT THIS MEETING

(i) Car Parking Provision

Visitor Car Parking is available via Weatherly Drive, please follow the directions.

(ii) Wheelchair Access

The Meeting Room has access for wheelchair users and there will be a disabled parking bay nearby, this is within the main car parking area and will need to be accessed via the intercom with reception using the staff entrance. Please let us know in advance if you will require this so that we can make arrangements with reception.

(iii) Emergency Evacuation Procedure

The attention of Members, Officers and the public is drawn to the emergency evacuation procedure for the **Conference Room**: Follow the Green Fire Exit Signs to the Circular Car Park to Front of Admin Building Assembly Point

(iv) If you have any questions about this meeting, require special facilities to enable you to attend. If you wish to inspect Minutes, reports, or a list of the background papers relating to any item on this agenda, please contact:

Office of the Police and Crime Commissioner
Valley Road
Portishead
BS20 8JJ

Telephone: 01278 646188

Email: JAC@avonandsomerset.pnn.police.uk

(v) REPORT NUMBERS CORRESPOND TO AGENDA NUMBER

AGENDA

11 March 2025, 13:00 – 16:00

1. Apologies for Absence

2. Emergency Evacuation Procedure

In the event of an emergency, the evacuation procedure for the **Conference Room** is as follows: Follow the Green Fire Exit Signs to the Circular Car Park to the Front of the Admin Building where there is an Assembly Point.

3. Declarations of Gifts/Offers of Hospitality

To remind Members of the need to record any personal interests or any **prejudicial interest** relating to the agenda and disclose any relevant receipt of offering of gifts or hospitality

4. Public Access

(maximum time allocated for this item is 30 minutes)

Any member of the public wanting to attend a JAC meeting must submit a written application and secure written agreement of the JAC Chair. Statements and/or intentions to attend must be received no later than 12.00 noon on the working day prior to the meeting and should be emailed to JAC@avonandsomerset.pnn.police.uk

The JAC Chair reserves the right to refuse or suspend access if there is any security risk to the public or a member of the public's behaviour is disruptive in any manner. A member of the public may only address the meeting, for a maximum of five minutes, where a statement has been previously provided to the JAC Chair and prior sanction has been granted.

5. Minutes of the Joint Audit Committee Meeting held on 19 December 2024 (Report 5) 13:00

6. Office of the Police and Crime Commissioner Strategic Risk Register (Report 6) 13:15

7. Constabulary Strategic Risk Register and Verbal Organisational Risk Update from the Chief Constable/ Deputy Chief Constable (Report 7) 13:30

8. Internal Audit Progress Review (Report 8) 14:00

9. External Audit: (Report 9) 14:15
a) Progress Report

10. Business from the JAC 14:30
a) Governance and Scrutiny Board Update (Oral Update)
b) Update on IOPC Investigations (Oral Update)

11. Avon and Somerset PEEL Assessment 2023-2025 (Oral Update) 14:45
 12. Internal Audit (Report 12): 15:00
 - a) SWAP Quarterly Update
 - b) Q1-2 2025/26 Internal Audit Plan
 - c) ASP Business Continuity – Final Report
 - d) ASP Culture Within Specialist Teams – Final Report
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Part 2

Items for consideration without the press and public present

13. Business from the JAC 15:45
 - a) ERP (Written update)

POLICE AND CRIME COMMISSIONER FOR AVON AND SOMERSET

MINUTES OF THE JOINT AUDIT COMMITTEE (JAC) MEETING HELD ON THURSDAY 19 DECEMBER 2024 AT 13:00. MEETING HELD VIA TEAMS.

Members in Attendance

David Daw
Zoe Rice
Nassir Mahmood
John Vanstone
James Madsen

Officers of the Constabulary in Attendance

Sarah Crew, Chief Constable
Nick Adams, Constabulary CFO
Will White, Assistant Chief Constable, (part of the meeting)
Catherine Karlson, Head of Compliance and Data Protection Officer (part of the meeting)
James Riccio, Detective Superintendent (part of the meeting)

Officers of the Office of the Police and Crime Commissioner (OPCC)

Alice Ripley, OPCC Chief of Staff
Paul Butler, OPCC CFO
Ben Valentine, OPCC Senior Performance and Governance Manager
Vicky Ellis, OPCC Secretariat Manager

Also in Attendance

Clare Moody, Police and Crime Commissioner
Charlotte Wilson, SWAP
Juber Rahman, SWAP
George Amos, Grant Thornton
Julie Masci, Grant Thornton

40. Apologies for Absence

Jon Reilly, Deputy Chief Constable
Louise Hutchison, Chief Officer – People and Organisational Development
James Davis, Delivery Manager – Portfolio

41. Emergency Evacuation Procedure

The emergency evacuation procedure for each TEAMS call participant was left for them to determine.

42. Declarations of Interest / Gifts / Offers of Hospitality

None.

43. Public Access

There were no requests for public access received before the 12.00 noon deadline the working day prior to the meeting.

44. Minutes of the Joint Audit Committee (JAC) Meeting held on 12 September 2024 (Report 5)

RESOLVED THAT the minutes of the meeting held on 12 September 2024 were confirmed as a correct record.

Action update:

- Minute 20** Members had attended induction activities such as participating in Ride Alongs. There were no additional documents identified to share with Members. **Close action.**
- Minute 20 (i)** The Constabulary confirmed there had been no requirement to discuss the CLOUD migration at the Ethics Committee. There was a clear process to do so should this become required. **Close action.**
- Minute 25b (ii)** A section on learning, leadership, culture and equality and diversity had now been included in all internal audit reports. **Close action**
- Minute 32** The Police and Crime Plan had been finalised and published and the link was shared with the Members. The PCC would share the action plan with Members when it was complete, noting this would likely be in April 2025. Members accepted the offer to receive the presentation provided to the Police and Crime Panel. **Close action.**
- Minute 33 (i)** The information relating to staff turnover had been shared with Members. **Close action.**
- Minute 33 (ii)** The Constabulary had provided a report to be discussed at Item 7a to explain the mapping of organisational to corporate risk. **Close action.**
- Minute 33 (iii)** The Constabulary had provided a report to be discussed at Item 7b to provide the high level risk information and major milestones of the 8 change programmes. **Close action.**
- Minute 34** The Constabulary had published the [Summary Statement of Accounts](#). **Close action.**
- Minute 35 (i)** The actuary had confirmed there would be no significant impact on the prior year pension position. **Close action.**
- Minute 35 (ii)** Grant Thornton had sent the IT Audit Report to Members. **Close action.**
- Minute 36a** The Minutes of the Governance and Scrutiny Board had been sent to Members and it was noted that the future minutes would also be provided. **Close action.**
- Minute 36c** The PEEL presentation had been sent to Members. **Close action.**

- Minute 36 (i)** ERP had been added as a standing agenda item. **Close action.**
- Minute 37c** The Constabulary had amended the policy for corporate credit cards to highlight the exceptions and resent it to all card holders. **Close action.**
- Minute 37d** The JAC Chair and SWAP would meet to discuss how to involve Members in the Audit Planning process.
- Minute 38** Internal Audit Progress Review would be discussed at every other JAC meeting. **Close action.**

45. Office of the Police and Crime Commissioner (OPCC) Strategic Risk Register (Report 6)

The Senior Performance and Governance Manager orally highlighted the important points and changes to risk assessments from the paper.

SR1 – Governance Failure

The revised process for the PCC's Governance and Scrutiny Board had been agreed and would begin in February. The meeting would align to the Constabulary Management Board and the PEEL questions and allow more in-depth discussions.

SR2 – Failure to deliver the Police and Crime Plan

The PCC had published the new plan and had begun work on the action plan to sit behind it to direct the work required to deliver it.

SR3 – Financial incapability or ineffectiveness

This had already changed significantly since the paper had been written following the Government's funding settlement announcement.

SR4 – Failure to act as the voice of local people

This risk had reduced due to the significant engagement in the form of consultation and forums the PCC had held, which had been seen to strengthen the connection to local people.

SR5 – Lack of capacity, or capability, or poor wellbeing within the OPCC

Members had received an update on the work of the plan and the resourcing of the work coming out of the action plan would be considered by OPCC senior leaders.

SR6 – Failure to deliver commissioned services

The increase in risk to deliver commissioned services was driven by the financial pressures on the services following national announcements and the as yet unknown impact of these. The Ministry of Justice had also just announced the reduction in Victims funding of 4.2% and Members sought to understand the impact this might have on the service victims received and the subsequent effect on public confidence. The PCC acknowledged this was a risk.

Members raised concerns where the failure to deliver commissioned services risk after mitigation had now been flagged as red which would lead to victim support services being reduced and ultimately confidence in ASP declining further.

The Chief Constable accepted it is a challenging environment and that this risk would be kept under review.

The OPCC Senior Performance and Governance Manager confirmed that the risk to victim support services and confidence in the police force are considered under separate categories in the risk register.

SR7 - Failure to support delivery of effective and efficient collaborations with other forces

The South West police forces were looking at opportunities for collaboration, such as IT systems. Members queried the significance of The Police Foundation Report about reforming national policing. The Chief Constable advised this was potentially a very significant report that had opened up debate around policing structures. The Constabulary would be linking in with the lead officer for the work.

SR8 – Failure to deliver effective and efficient collaborations or outcomes with other partners

The final Reducing Reoffending strategy had been delayed due to feedback from partners. A workshop was planned to discuss the feedback and consider the national paper.

Members noted the PCC's forums had been informative and engaging. The Members discussed the importance of partners to delivering the plan and the implementation plan which would identify the mitigations to bring the risk at SR2 down.

46. Constabulary Strategic Risk Register and Organisational Risk Update (Report 7)

Corporate Risk Register

The Chief Constable identified the risk register showed a tightening of risk disciplines and gradings of risks. Each entry was owned by a member of the Chief Officer Group and these were managed through the Constabulary Committee meetings. Three changes had been made as a result of the process in People, Finance and Infrastructure.

The changes in Finance and Infrastructure were due to the changes in the MTFP projection and the inability to set a firm plan until the funding settlement had been announced. The Constabulary would now be able to finalise a plan following the announcement since the report had been written and it was likely some items in the capital plan would need to be delayed.

The changes in the People risk had been driven by the results of the People Survey, the leadership review, engagements with staff as well as the Hot Debrief from the HMICFRS Inspection.

The Chief Constable confirmed the risks highlighted in the register reflected her concerns. The Chief Constable was concerned about the condition, capacity, capability, wellbeing and morale of the workforce in the frontline teams. Some of the issues affecting this were national and some were Avon and Somerset specific. The Chief Constable acknowledged the impact this would have on the service the public received and the subsequent impact on public confidence in the police.

The Chief Constable noted the HMICFRS Inspection report due to be published in January and some of the concerns it was expected to raise. The Chief Constable discussed the funding settlement announcement and the savings that ASP would be required to make,

noting that other public services were also in a challenging position and the impact this would have on the increase in calls to the police for assistance.

The Chief Constable was working with her Chief Officer team to identify the ways to improve the conditions for the workforce, such as technology interventions and other changes to mitigate some of the risks highlighted in the paper.

The Chief Constable described the four delivery mechanisms that would be used to address this: Change Programme; Continuous Improvement; Business as Usual; Leadership Behaviours.

Members thanked the Chief Constable for the open and honest updates. Members requested a presentation at a Member's Briefing from the Director of People and Organisational Development on the people survey, noting that half the workforce had not responded. The results had shown a split workforce, with some having very difficult experiences, mostly on the frontline, while in other areas there had been improvements. The Chief Constable noted the Identifying Disproportionality report and the documentary that had aired in the year as providing a unique platform for ASP to speak about some of the challenges and struggles policing was facing.

Members queried how overall positive outcome rates for crime were around 11% and how this compared to other police forces across the country. The Chief Constable confirmed that the rates were similar to comparable police forces

a) Mapping of Organisational risks to Corporate Risk Overview

Members welcomed the report which had answered their previous questions and provided a useful overlay. Members queried whether there should be more organisational risks under finance, which was red and increasing on the corporate risk register but had the least number of Organisational risks and only two being red. The ASP Chief Finance Officer agreed to reflect on that.

b) Change Programme Risks and Milestones

Members welcomed the report. Members sought to understand the RAG status of the programme risks, highlighting in particular the ERP project which was Red but the programme it was part of was green. The Chief Finance Officer agreed to review this. Members noted a description of the status would be helpful to ensure it was understood what a green status meant and how it was decided upon..

RESOLVED THAT

- i. the Director of People and Organisational Development would be invited to present to the Members at a future briefing.
- ii. Chief Finance Officer OCC to reflect on whether there is / should be a linkage and the actual number of organisational risks to the overall Corporate Risks.
- iii. Chief Finance Officer OCC to review the RAG status of the change programme risks and that an explanation / description of why a particular status is given is provided.
- iv. All reports provided to the JAC to highlight in the text where changes have been made, if it is a report Members have seen previously. This applies not just to Risk reports but any paper / document which is presented on a regular basis to the

committee. It is recommended that consideration should be given to applying this practice to other committees' papers.

47. Annual Accounts and Governance Statement (Report 8):

The Constabulary CFO confirmed the Annual Accounts and Governance Statement had been completed with the external auditors and had been published on the Avon and Somerset Police website.

It was noted that while the government deadline for the work had not been met, Avon and Somerset were more advanced than many forces, some had not yet started their audit work.

Members recognised the good work of the ASP Finance Team and also the External Auditors and congratulated them on this.

48. External Audit (Report 9)

a) Finalised Auditor's Annual Report

The external auditors issued an unqualified opinion on the financial statements for the PCC and the Chief Constable on 5 November 2024. The report detailed one improvement recommendation for the ERP programme.

b) Joint Audit Findings Report

The draft report had been discussed at the September meeting, and this was the finalised report and the auditors had started planning their work for 2024/25. The Chair expressed thanks on behalf of the members and checked the restatement of disposals process was in place. It was noted that additional work and extra testing had been required following a previous recommendation. This was reliant on the adequacy of records kept and may be required again. In response to a question from the committee it was advised that the additional work on the journals had not led to any concerns and the auditors were confident that the ASP management team understood the limitations of SAP and the mitigations required. The Committee noted that the external auditors were satisfied with the mitigations in place.

49. Business from the JAC:

a) Governance and Scrutiny Board (GSB) Update

The OPCC CFO gave an update on the discussions at the most recent GSB on 18 December 2024, noting most topics had already been discussed at the JAC Pre-Meeting and earlier in agenda items. Discussions had included:

- The spending settlement announced by the government and the impact on the MTFP
- The OPCC budget and the Mid-Year Treasury Management report
- ERP – the governance and risk of the project
- Business cases generally and the need to review how initial estimates are completed for projects to ensure they are robust and accurate
- The Chief Constable discussed the impacts of the financial cuts for partners on ASP and staffing and the need to mitigate this

- The turnover of PCDA students and the leaver rate of 25% in the first 3 years. The majority of these are in the first year and ASP will look at improving this to ensure we are not expending resources in an inefficient way.

Minutes of all previous GSB meetings are available on the PCC's website.

b) Update on Independent Office of Police Conduct (IOPC) Investigations

The Chief Constable provided an oral briefing to Members on the current IOPC cases.

A&S currently have 15 investigations, 6 had been closed since the last meeting and 6 new ones had been opened. 5 were from 2023 and the remaining 10 were from 2024. 3 of the closed cases had been referred to the CPS awaiting a criminal prosecution decision and related to standards of driving. Members were assured that ASP have a gold group in place to review this and to provide extra scrutiny on the standards of driving. Telematics had also been introduced to vehicles to monitor this.

Of the other 3 closed cases, one was no case; another was closed for reflective practice and 1 was found to be misconduct.

c) Update on PEEL Inspection

The Assistant Chief Constable provided an oral update to the Members on the PEEL Inspection. The draft report had been received by ASP for comments and any data inaccuracies to be highlighted and publication of the final report was expected in February.

Members received some highlights from the Hot Debrief that ASP had received from the Inspection team, areas of good feedback and areas for improvement. There were areas of innovation that had been recognised by the Inspectors. ASP were anticipating 16 AFIs to be issued from the Inspection when the report was published.

Members asked if ASP felt it was a fair reflection of the force. ASP recognised it was helping to drive the areas of focus and noted nationally policing is struggling and has challenging targets.

d) Update on ERP Programme Management and implementation progress

Members had received a detailed update on the ERP programme at the Briefing session that morning. The Chief Finance Officer provided an oral update to the Committee to summarise. The programme was red in all measures and recognising the importance of the programme the Director of IT had taken on the lead for the work. Following the failure of part of the User Acceptance Testing, ASP had to redesign the way Time is managed in the system and were working on this, which would align with the way other forces approached this element.

ASP had also decided to seek a new implementation partner and were in the process of closing the relationship with the current provider and procuring a new partner.

ASP were managing the live legacy system risks and were working to mitigate those. ASP would provide a written update for Members for future meetings and this would include details of original and updated cost estimates.

Members requested sight of the lessons learned from the programme once these were completed.

RESOLVED THAT

- i. ASP would provide written updates to Members on the ERP project for future meetings.
- ii. ASP would provide the lessons learned report on ERP once it was complete.

50. Internal Audit (Report 11):

The Internal Auditors advised Members that a new CEO, Richard Clarke, had been appointed and would start in February next year. The new CEO would be looking to attend JAC meetings where possible. Members were also advised that Rupert Bamburger was moving on at the end of December and his post would remain vacant until the new CEO had joined to make a decision regarding his replacement.

The Chair requested a meeting with Richard once he had started.

a) SWAP Quarterly Update

Since the report had been provided to Members the Culture Audit had also been finalised and this would be reported to the next meeting. The Business Continuity Audit was due for finalisation imminently and the field work for the Audit of Ammunition and Armoury had nearly completed. The OPCC Audit of Statutory functions was due to commence in January. Work had started on the plan for Q4 and the auditors would be meeting with the Audit Inspection Team in relation to this.

Members queried the process for agreeing regional audits. The CFO advised that these were agreed by the Regional CFOs who jointly agree the areas of mutual risk and feed these back to each Joint Audit Committee. It was noted there were new CFOs across the region and there might be scope to refresh the approach.

Members queried the level of confidence the auditors had in the delivery of the plan and were assured that although there was some movement in the team SWAP remained confident of delivery by year end.

Members queried the extra steps triggered by a limited assurance rating and were advised that limited or no assurance ratings would be subject to a follow up plan and a follow up audit.

b) ASP Information Governance Final Report

The Audit had received a reasonable opinion and highlighted some areas of good practice.

Members highlighted the issues with ROPA and ASP holding data longer than they should which had been flagged in the risk report but elsewhere it states compliance and sought clarification as to whether the risk report sufficiently reflected the findings of this audit. Members were advised there is a template in place now and a programme of work has commenced with IT to address this.

Members acknowledged that the themes of leadership, culture and positive feedback had been included in the reports again.

Members queried SWAP the length of the timescales set for two of the actions to be completed (11 months and 23 months) and whether SWAP challenged Management's offered timescales for completion of actions.

Members were advised actions were agreed collaboratively to ensure unachievable actions were not set.

c) Criminal Justice

A limited assurance opinion was given in respect of the Criminal Justice Audit. Members were advised that since the audit the Criminal Justice team had undertaken a transformational restructure and part of the aim was to reduce the number of action plans. This had not shown consistent improvement and this had impacted on assurance.

Members sought to understand what was making the improvements challenging. ASP advised that since the report improvements in file quality had been seen and ASP were now working above the national average. ASP now had daily conversations with staff in both the Magistrates and the Crown Courts to ensure full understanding of requirements. There has been an increase in checking and testing files before submission to reduce the number returned by CPS. It was noted that both ASP and CPS have a high number of new in service and inexperienced staff which can cause issues but the relationships being built has seen them learning together and working as a team.

There had been 61 actions listed in the audit report and 40 of those had been closed, 10 were deemed no longer appropriate and 11 were in progress.

Members were keen to understand how the good progress made could be maintained. Members were told about Op Holmes, the tactical delivery group that was considering next steps and continuing the learning for inexperienced staff.

d) Treasury Management

A reasonable assurance opinion was given for the Treasury Management audit. Somerset County Council provide the Treasury Management services and the contract was due to be renewed in the new year. It was noted there would be a revision of the annual fee as there had been no increase since the contract had started. The contract now also provides for an annual discussion of inflation and review.

51. Any Other Business

Members agreed to hold the next meeting in person at Police and Fire HQ.

The Chief Finance Officer highlighted the public consultation launched by the Government on public audit and agreed to send the link to Members.

RESOLVED THAT

- i. The meeting on 11 March 2025 would be held in person at Police and Fire HQ
- ii. The CFO would send the link to the public consultation launched by the Government on public audit to Members.

Part 2

Items for consideration without the press and public present

No items.

The meeting concluded at 15:55

CHAIR

DRAFT

ACTION SHEET

MINUTE NUMBER	ACTION NEEDED	RESPONSIBLE MEMBER/ OFFICER	DATE DUE
Minute 32 OPCC Strategic Risk Register 12 September 2024	The action plan for Police and Crime Plan will be shared with members once it is available.	OPCC Senior Performance and Governance Manager	April 2025
Minute 37d Internal Audit – Six Monthly Audit Plan 12 September 2024	Internal Audit would involve JAC members in the Audit Planning process. The Chair to meet with SWAP to discuss how.	SWAP	March 2025
Minute 44 Action updates 18 December 2024	Partial action closure re PCC induction papers. Residual action for PCC CFO to investigate secure document sharing process.	PCC CFO	Update March 2025
Minute 46 (i) Constabulary Risk Register 18 December 2024	The Director of People and OD would be invited to present to the Members at a future briefing on the people survey.	Secretariat Manager	January 2025
Minute 46 (ii) Constabulary Risk Register 18 December 2024	OCC CFO to review the linkage and number of organisational risks to ensure accurately reflects the position on the corporate risk register	OCC CFO	March 2025
Minute 46 (iii) Constabulary Risk Register 18 December 2024	OCC CFO to review the RAG status of change programme risks	OCC CFO	March 2025
Minute 46 (iv)	All reports provided to the JAC to highlight where changes have been	All report writers	Ongoing

Constabulary Risk Register 18 December 2024	made, if it is a report Members have seen previously		
Minute 49d (i) Update on ERP Programme Management 18 December 2024	ASP would provide written updates to Members on the ERP project for future meetings	OCC CFO	Ongoing
Minute 49d (ii) Update on ERP Programme Management 18 December 2024	ASP would provide the lessons learned report on ERP once it was complete	OCC CFO	March 2025
Minute 51 (i) Any Other Business 18 December 2024	The meeting on 11 March 2025 would be held in person at Police and Fire HQ	Secretariat Manager	March 2025
Minute 51 (ii) Any Other Business 18 December 2024	The OCC CFO to send the link to Members for the public consultation launched by the Government on public audit	OCC CFO	January 2025



Office of the Police and Crime Commissioner for Avon and Somerset

Strategic Risk Register

February 2025 v2

A Strategic Risk is anything that might impede the delivery of the organisational objectives. Risk management is the process by which these risks are identified, assessed and controlled. This risk register is the document which records these risks and related information.

Risk is assessed by considering the causes of the risk and the consequences if that risk were to happen. The scoring is therefore based on the likelihood multiplied by the impact. The below grids explain the scoring in more detail. Risk is about planning for the future so when considering the assessment it goes beyond current performance.

Impact	5 Extreme	5	10	15	20	25
	4 High	4	8	12	16	20
	3 Moderate	3	6	9	12	15
	2 Low	2	4	6	8	10
	1 Negligible	1	2	3	4	5
		1 Rare	2 Unlikely	3 Possible	4 Likely	5 Almost Certain
Probability						

Probability	
5 Almost Certain	Likely to occur within a twelve-month time period, or about a 75% probability of occurrence
4 Likely	Likely to occur within a two-year time period, or about a 50% probability of occurrence
3 Possible	Likely to occur within a three-year time period, or about a 25% probability of occurrence
2 Unlikely	Likely to occur within a five-year time period, or about a 15% probability of occurrence
1 Rare	Likely to occur in a ten year period, or about a 5% probability of occurrence

Impact	
5 Extreme	<ul style="list-style-type: none"> • Fatality of any individual • Financial impact greater than £1/2 m • Vote of no confidence from Local Authorities - failed • National media attention • Government/ HO intervention • Total disruption to service • Exceptional / long term reduction in public confidence
4 High	<ul style="list-style-type: none"> • Serious life-threatening injury of any individual • Financial impact greater than £1/4 m • Vote of no confidence from Local Authorities - failed • Regional media attention • Adverse comment by Minister / auditor • Major service disruption / reduction in public confidence
3 Moderate	<ul style="list-style-type: none"> • Serious non-life-threatening injury of any individual • Financial impact greater than £100k • Criticism from the Police and Crime Panel • Local media attention • Significant service disruption • Significant reduction in public confidence
2 Low	<ul style="list-style-type: none"> • Minor injury of any individual • Financial impact up to around £100k • Multiple thematic complaints • Some service disruption • Some reduction in public confidence
1 Negligible	<ul style="list-style-type: none"> • Slight injury of any individual • Low level financial loss • Isolated complaints • Minor service disruption • Minor / contained negative consequences

The unmitigated scores are the assessment based on the current position with no action taken or controls in place. The mitigated scores are based on the success of the controls (anticipated or actual) in reducing the risk.

It should be noted that the OPCC and the Constabulary are separate organisations and therefore each may assess the same risk as being at a different level. This is most evident in the risk of failure to deliver the Police and Crime Plan. This exists on both Strategic Risk Registers but may score differently. One of the main reasons for this is that the OPCC assess delivery of the plan as a whole which relies on agencies, other than the Constabulary to fully deliver e.g. the CPS and Courts. Whereas when the Constabulary assess this risk they need only consider the parts of the plan they are expected to deliver. A difference may also be caused whether considering the risk in the short, medium or long term.

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Governance Failure	SR1	Chief of Staff	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			3	4	12
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> Joint Governance Framework complexity not fully understood in all aspects by ASP. There are too many 'priorities' for the ASP workforce and this may mean the Police & Crime Plan is not understood or prioritised. New duties and expectations of PCCs being created by central government, potentially without additional 'levers' to support delivery. Taking on new responsibilities means there are more likely to be governance failures whilst the team learn. OPCC failure to engage on the design element of the '3 Ds' ways of working. Failure to ensure effective risk management and support the delivery of service. Information governance failure. Ineffective scrutiny and oversight of services and outcomes delivered by the Constabulary including SPR. Ineffective scrutiny and oversight of the OPCC Equality Duty. Failure to ensure adequate transparency of the OPCC and/or the Constabulary. Failure to ensure Chief Constable sets appropriate culture, ethics and values. Lack of control/influence over Criminal Justice agencies or other partners. 		<ul style="list-style-type: none"> Lack of oversight and scrutiny of the Constabulary. Failure to deliver the Police & Crime Plan (SR2). Financial loss (SR3). Reduced public confidence and trust. Failure to deliver OPCC statutory requirements. The Constabulary and/or OPCC will be inefficient/ineffective. Damaged relationship with Constabulary, commissioned services or partners. Government criticism or penalties. Panel criticism. Sub-standard performance results and poor inspection outcomes. Risks not managed. Failure to improve the delivery of the broader Criminal Justice Service. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> Governance & Scrutiny Board (GSB). OPCC Management Board (OMB) - oversight of performance, risks and issues and provides a formal decision making mechanism for internal (non-Constabulary) business. Joint Governance Framework to be kept under review to ensure up-to-date and fit for purpose OPCC policies and procedures being reviewed. OPCC self-assessment of compliance with their Equality Duty. Quarterly performance report and dashboard. PCC and Chief Constable 1:1s. OPCC attend CMB, SPM and other strategic meetings (open invitation from the CC). Joint Audit Committee, External Audit, Internal Audit and annual governance statement. Police and Crime Panel meetings. COG attendance at weekly OPCC SLT. Compliance with statutory reporting requirements. Victim Services appointed and managed by the OPCC Commissioning Team. Independent scrutiny panels for complaints, use of police powers & OOC. OPCC Information Governance Group oversees compliance with GDPR and DPA 2018. PCC chairs the Local Criminal Justice Board Review publication scheme and check website is compliant with relevant requirements. ASP Leadership Days. 	Mar-25	Director of P&A CoS	<ul style="list-style-type: none"> New format GSB went live in Feb-25. 		
	Mar-25	CoS CFO Head of HR & BS	<ul style="list-style-type: none"> A review of the Joint Governance Framework is ongoing, informed by guidance and best practice from a national level. HR Policy review is progressing, with staggered publication to staff continuing through 2024/25. A digital record is being kept when staff confirm they have read the documents with a few completions outstanding. Legal review of policies and procedures carried out to ensure legal compliance. OPCC has decided to expand this work to include APCC self-assessment on equality and race, which was updated and reissued in autumn 2024. 		
	Mar-25	CoS	<ul style="list-style-type: none"> Legal review of policies and procedures carried out to ensure legal compliance. OPCC has decided to expand this work to include APCC self-assessment on equality and race, which was updated and reissued in autumn 2024. 		
	Apr-25	Director of P&A PCC CoS CFO	<ul style="list-style-type: none"> Reports will be revised to reflect the Police & Crime Plan 2024-29 and the Implementation Plan. The internal audit report on governance concluded that the PCC and CC have an adequate and effective framework for risk management, governance and internal control. 		
	Apr-25	CoS CoS CoS Director of P&P Director of P&A CFO PCC CoS Director of P&A	<ul style="list-style-type: none"> Specified Information Order - quarterly performance reports and complaints overview on PCC website. IOPC now publishing regular quarterly date and working with APCC and the IOPC to refine data sets with the aim of providing more useful insight for OPCCs. Although the governance process is working well the outcomes do not necessarily reflect this. Publication scheme has been updated and changes are being implemented. Leadership days held in Jan/Feb-25 which sought to explain ASP priorities with a focus on service delivery to the public and the importance of one-to-one meetings between managers and teams. 		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to deliver the Police and Crime Plan	SR2	Chief of Staff	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	16
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> Significant increases in recorded and allocated crime putting the ASP workforce under pressure and impact on service to the public. Savings requirements will result in a significant reduction in Police Staff Investigators – this will reduce the capacity of CID and likely cause further impact on Patrol. Savings requirements have resulted in a significant reduction in PCSOs – this will reduce the capacity to deliver Neighbourhood Policing. Areas for Improvement (from PEEL) relate to significant areas of the Plan also. Spontaneous operational needs divert resources from work that delivers against the Plan. Prevention is hard to measure/evidence and needs more than the police to deliver. Internal police culture and leadership at an operational level. Male violence against women and girls carries significant volume and harm. Limited capacity/capability within the Constabulary – inexperienced workforce (particularly in Patrol). Positive Outcomes – not seeing the improvements hoped for. Police response to 'neighbourhood crimes' does not meet public expectations. Disproportionate outcomes particularly for Black, Asian, mixed and minoritised communities. Workforce not representative of the communities of A&S; insufficient progress has been made. Court backlogs means justice is not being delivered effectively or efficiently. Limited control/influence over partnership agencies e.g. CJS. More officers will result in more people going through an already overstretched criminal justice system. Constabulary staff survey results show a decline in 2024. Limited oversight of improvement activity and related outcomes. Underpinning the delivery risk of all of this is the financial uncertainty and the increased public expectation from the additional funding that policing has received both through central government grant and local taxpayers' increase in precept funding. 		<ul style="list-style-type: none"> Loss of legitimacy in the OPCC and Constabulary. Loss of public confidence/trust in the OPCC and Constabulary. Undermines the Peelian Principle of policing by consent. Failure to keep people safe. Failure to protect and support vulnerable people. Failure to bring offenders to justice. People will feel unsafe. Police and Crime Panel criticism and/or fail to agree precept increase. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> Government's Neighbourhood Policing Commitment. Serious violence hotspot and ASB fund. Develop a Police & Crime Plan 2024-29. Develop an Implementation Plan to support delivery of Police & Crime Plan 2024-29. Governance & Scrutiny (GSB). OPCC Business Plan focusses the work of the OPCC on supporting the Police & Crime Plan. OPCC attend CMB and other strategic meetings (open invitation from the CC). PCC and Chief Constable 1:1s. Audits and Inspections (HMICFRS & SWAP) overseen by Joint Audit Committee. Internal assurance mechanisms are in place to evaluate delivery of the Plan's objectives. Oversight of all strategic constabulary data through Qlik. 	Apr-25	CFO	<ul style="list-style-type: none"> The national commitment aligns with Priority 1 of the Plan. £4.6 million allocated to ASP for 2025/26. Awaiting details of the model for delivering additional neighbourhood officers. Funding confirmed for the same level in 2025/26. Plan published in Dec-24. Feedback categorised into police, partners or PCC with OPCC senior leads for each workstream. Implementation Plan due to be live from Apr-25. 		
	Apr-25	Director of P&P Director of P&A CoS			
	Apr-25	Director of P&A CoS	<ul style="list-style-type: none"> Plan and objectives will be refreshed for 2025/26 to incorporate the relevant parts of the Implementation Plan. OPCC attendance at CMB and other committees and governance meetings which allows for OPCC to play an active role in ASP governance and feeding through points of escalation to GSB which follows this. ASP governance and performance structure changed Sept-23; aligns with PEEL. 		
		CoS PCC CFO CFO Director of P&A			

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Financial incapability or ineffectiveness	SR3	CFO	4	5	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	16
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> Single year funding settlement for 2025/26. Uncertainty of the requirements/conditions of the Neighbourhood Policing Grant. Cost increases due to high inflation and interest rates. Pay awards may exceed central government projections and effectively be unfunded. Pressure on elements of savings plans due to performance challenges. May not be able to achieve maximum precept increase from 2026/27 onwards. Risks around pension funds due to wider economic impact. Increasing pension costs for officers and staff schemes; although this will probably be funded. Revenue and capital budgets not fully funded for term of MTFP. Diminishing potential for capital receipts. Scale of capital programme increased. National work will require local funding with limited control over decision making e.g. ESMCP, NPAS, national IT. 		<ul style="list-style-type: none"> Officer numbers protected so may lead to using officers in roles currently undertaken by civilians. Failure to set a sustainable revenue budget or capital plan across the medium term. Failure to meet heightened expectations of stakeholders. Loss of public confidence. Unable to fund expected service. Unable to fund delivery of PCC priorities (SR2). Unable to afford change. Revenue budget underspends may undermine support from PCP for sustainable increases to the precept. Failure to ensure value for money. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> Joint work on savings plans being progressed through clear governance process. Includes consideration of 'spend to save' plans. Medium and long term financial planning. Regular oversight of revenue & capital budget. Maintain adequate risk-assessed reserves. Subject to external and internal audit both overseen by the Joint Audit Committee. Treasury Management strategy in place outcomes reviewed by CFOs. HMICFRS inspection regime. 		CFO CFO CFO CFO CFO CFO	MTFP Forecast after planned savings: 2025/26 balanced 2026/27 -£3.9 million 2027/28 -£5.0 million 2028/29 -£8.3 million 2029/30 -£10.6 million Key assumptions: Income – from 2026/27 core grant funding will increase by 0.9% p.a. and precept funding will increase by £10 in each of the years 26/27 and 27/28 then returning to 2% p.a. increase thereafter. Pay – will increase by 2.8% in 2526, 2.5% in 26/27 and 2.0% p.a. thereafter Inflation (non-pay) – 3.0% in 2024/25, decreasing to 2.0% p.a. thereafter		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to act as the voice of local people	SR4	Chief of Staff	4	4	16
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			3	4	12
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> PCC establishing and building on public connections and networks. Failure to engage with the public and other stakeholders. Lack of public awareness of the PCC. Lack of public confidence in the PCC. Engagement methods do not always reach a wide audience or different communities or groups; failure to engage with young people. 		<ul style="list-style-type: none"> Loss of legitimacy. Failure to understand people's priorities and issues re policing and crime and which could be biased by only hearing those individuals already proactive/engaged. Police and Crime Plan and delivery not aligned to public concerns and priorities. Failure to hear the victim's voice may mean services do not meet the actual need. Police and Crime Panel criticism and/or fail to agree precept increase. Lack of public confidence in the PCC. Could undermine the working relationship between the Constabulary and OPCC. Low voter turnout in PCC elections. Loss of political support for the need for PCCs. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> Police & Crime Plan consultation. Annual Precept Survey. PCC engagement programme. Overarching approach to communications with more focus on strategic priorities and objectives. Creation of tactical communications plans for particular workstreams (including public engagement/events) with ownership and delivery allocated to one person who is accountable. OPCC / ASP Corp Comms joint meetings. Calendar of regular media appearances / communications activities which will also link to national days or weeks where relevant. Stakeholder mapping and management. New contact management system to facilitate better contact analysis. Tackling Disproportionality programme supported by the OPCC Discharging good governance (SR1) and delivery of the Police and Crime Plan (SR2) are critical to ensuring confidence in the PCC. Gold Groups manage critical issues of public confidence in the police. A&S Police & Crime Survey collects data on public awareness of and confidence in the PCC. 	Apr-25	Head of C&E	<ul style="list-style-type: none"> There will be a published version of the Implementation Plan which will be used as part of the 'you said, we did' element of this consultation. 2025/26 survey closed. Planning for the next survey will begin in summer 25. The format and content of this will be reconsidered. This will include public forums held every other month, starting May-25, covering all local authority areas. New form and App live which records, visualises and analyses stakeholder engagement. Stakeholder mapping still ongoing. New Contact Management System (iCase) further delayed. Go live expected Mar-25. Delivery of this work involves community engagement including an independent scrutiny panel. The OPCC has a standing invite to all Gold Groups. 		
	Jun-25	Head of C&E			
		Head of C&E			
		Head of C&E Head of C&E			
		Head of C&E Head of C&E			
	Apr-25	Head of C&E			
Mar-25	Director of P&A Head of C&E PCC / CoS				
	CoS Director of P&A				

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Lack of capacity or capability, or poor wellbeing within the OPCC	SR5	CoS	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			3	4	12
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> • Vacancies and absence have a significant impact in the small OPCC team and can contribute to stress and sick absence. • Increased demand on HR while ERP is being tested and implemented and SharePoint migration completed. • Increased government legislation and other activity in policing and crime prevention places greater demands on the OPCC, frequently with short notice making it difficult to manage resource. • High levels of recruitment in terms of employees, volunteers or panel member roles. • As a result of new police misconduct regulations there is an anticipated increase in Police Appeal Tribunals (PATs). • Short-term projects funded by government require resource to be recruited or moved within short time-scales. 		<ul style="list-style-type: none"> • Increased likelihood of materialisation of all other strategic risks through delivery failure. • Delivery of work is late or not to standards of quality desired. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> • PDR process and regular 1:1s between line managers and direct reports. • Annual staff survey, supplemented by pulse surveys, to inform internal policy and ways of working. • Learning and Development Plan with commensurate training budget maintained. • Wellbeing resources and support offered and promoted, including Health and Wellbeing Passports. • Salary levels set at a reasonable market rate and in line with other OPCCs. • Regular team meetings to share knowledge and resolve issues. • Online Applicant Tracking System implemented to make recruitment process more effective and efficient for Hiring Managers, HR team and candidates. • Implement new HR and Finance back-office system (ERP Oracle) with ASP to make processes more effective and systems led. • Police Appeals Tribunals training delivered to relevant OPCC staff. 	Apr-25	Head of HR & BS Head of HR & BS	<ul style="list-style-type: none"> • 2024 staff survey had 86% completion rate, and overall another set of positive indicators. Some areas improved including L&D, others saw decrease and are being addressed including work-life balance. • OPCC Learning & Development Plan (Sept-23). Training opportunities and resources developed and promoted. Developing competency framework – Apr-25. • Wellbeing and financial support initiatives promoted to the team. • Wellbeing strategy launched Aug-23. Review of strategy and policy under way looking at how it has been embedded and any improvements required - Mar 25. • Extended Talos contract for an additional year due to ERP delays. • HR working alongside ASP colleagues to test and implement new system. Go live delayed to Autumn-25 with a review of the risks and viability of this date to take place. ASP looking to appoint new implementation partner. Delays likely to extend beyond Oct-25. 		
	Mar-25	Head of HR & BS			
	Oct-25	Head of HR & BS Head of HR & BS Head of HR & BS			
		Director of P&A			

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to deliver commissioned services	SR6	Director of P&P	5	4	20
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	4	16
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> Employer national insurance increase; and higher wages due to the increase in minimum wage and VCSE sector pay increases will negatively impact services – unknown how they will respond to this. Cost of living / inflationary increases reduce the capacity of commissioned services to deliver. Short term Home Office funding arrangements and cuts to budgets in agreement period. Reduced MOJ funding for victim services for 2025-26 (MOJ formula and general grants). Reduction in MoJ funding. Home Office funding for DRIVE ends Mar-26. Services without sustainable funding and cliff-edge arrangements. Reduction in rape support fund means less funding for therapeutic services. Victims and Prisoners Act is proposing only modest funding to deliver the Collaborative Commissioning Duty. Lighthouse (the primary commissioned service) not delivering to the agreed standard. Increasing demand including victim support services; particularly DA and SV. Significant additional reporting requirements for compliance purposes. Failure to hear the victim's voice may mean services do not meet the actual need. Contractor vetting delays putting some commissioned services at risk. SARCs required to meet the Forensic Science Regulator (FSR) Statutory Code of Practice, including ISO standard, by Oct-25. Compliance will be more expensive and complex than originally predicted. There are many SARCs (including the one in A&S) that may not meet this deadline. 		<ul style="list-style-type: none"> Failure to support and protect, victims particularly vulnerable victims – PCP Priority 1 (SR2). Failure to reduce harm. Loss of public confidence in the PCC. Damaged relationships with Constabulary and partners. Non-compliance with Government grants. Reduction or withdrawal of victims grant from Government. Failure to devolve further funding/commissioning. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> Commissioning Strategy. Victim Services recommissioning for 2025/26. Lighthouse victims' service jointly established with the Constabulary: service under joint review. Maintain a sufficiently resourced commissioning team within the OPCC. Victim Services Provider forum and AWP Partnership Board are regular joint strategic meetings with commissioned services. 6-monthly monitoring of services financial returns. Scan and apply for additional funding as available. Lobbying to increase funding for Victims and Prisoners Act requirements. Pursuing funding from MoJ related to Victim's Code of Practice. Vetting exemptions sought as necessary for contractors to mitigate delays. Independent evaluation of DRIVE to demonstrate value of the programme and secure further funding. Reduction in MoJ victim services funding offset by PCC in Jan-25. OPCC team working closely with providers to manage impacts. SARC mitigation plans are being developed for each domain area and additional funding will be resolved through the collaborative commissioning agreement. National guidance being developed if SARCs do not meet the compliance deadline. 	Apr-25	Director of P&P	<ul style="list-style-type: none"> Commissioning Plan signed-off Mar-24. Service providers appointed with new contracts to start Apr-25. Third party review carried out and draft report received in Nov-24. Working with ASP to agree future ways of work. 		
	Mar-25	Director of P&P Director of P&P			
	Apr-25	Director of P&P Director of P&P	<ul style="list-style-type: none"> Preliminary findings received in Jan with full report by Mar-25. 		
	Apr-25	Director of P&P			

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk
Failure to support delivery of effective and efficient collaborations with other forces	SR7	Chief of Staff	5	3	15
			Mitigated Probability	Mitigated Impact	Mitigated Risk
			4	3	12
			Mitigated Risk change:		
Cause		Impact			
<ul style="list-style-type: none"> Challenges with staff retention and capacity in South West Forensics. Ineffective governance and scrutiny over existing collaborations – particularly SWROCU. NPAS is particularly challenging in terms of lack of consensus on future direction and sustainable funding. Failure to agree effective models for collaboration. Ineffective governance and ownership of regional projects and programmes. Tension between local forces and collaborations in terms of competing interests and lack of uniformity of people and processes. Lack of direct influence/control in order to make changes i.e. everything must be done by (multi-force) committee. 		<ul style="list-style-type: none"> Governance failure as a duty of the PCC (SR1). Failure to deliver value for money. Failure to deliver specific services provided by existing collaborations. Inefficient compared to other regions/areas. Criticism from HMICFRS. Government scrutiny/intervention. Lack of resilience otherwise provided by a collaboration. Forced to accept others' terms from future alliances or mergers. 			
MITIGATION					
Controls	Review date	Owner	Commentary / Controls updates		
<ul style="list-style-type: none"> Regional Collaboration Advisor and Coordinator roles recruited to support PCCs. External review of SW Forensics was commissioned. Collaboration Governance. SWAP are the Internal Auditor – working in partnership with other regional forces. Regional ACC is in place (in line with HMICFRS recommendations). PCC is national lead on Minerva collaboration, alongside CC as police lead. 		CoS CoS CoS CoS CoS	<ul style="list-style-type: none"> Regional Collaboration Advisor started Feb-24 and Coordinator Jul-24. SW Chief Constables and PCCs agreed to implement review recommendations and extra investment. Two SW Operational Boards chaired by ACCs, feed into SW Strategic Board. CC Crew charring regional group exploring scope for closer collaboration on IT systems. Regional PCC representation at the NPAS Board. Op Scorpion – regional anti-drugs operation – has been running (approximately) quarterly from Jan-22. New Regional ACC recruited in November, with OPCC involvement in selection. 		

Risk	URN	Owner	Unmitigated Probability	Unmitigated Impact	Unmitigated Risk	
Failure to deliver effective and efficient collaborations or outcomes with other partners	SR8	Chief of Staff	4	4	16	
			Mitigated Probability	Mitigated Impact	Mitigated Risk	
			4	3	12	
			Mitigated Risk change:			↔
Cause		Impact				
<ul style="list-style-type: none"> The broader Criminal Justice System is not operating effectively with significant delays in cases getting to court and insufficient capacity in prisons. Locally, Op Bluestone/Soteria has put more people and cases into the CJS and this may further increase because of Op Bright Light. Limited control/influence over other criminal justice agencies. New duties and expectations of PCCs arising from the national review. PCCs appear to have extra responsibility but without additional 'levers' to support delivery. Macro-economic factors could have a detrimental effect on partners, particularly Local Authorities. This financial position could cause partners to withdraw or reduce levels of service to partnerships. This increases the risk of demand and funding requests moving to ASP and OPCC. OPCC unable to effectively support the growing number of partnership programmes. Failure to put in place effective governance and ownership of partnership working. Differing priorities and leadership of agencies. Changing political and economic landscape can make partnership working more challenging. Lack of meaningful 'live' information sharing. National review of CSPs. Violence Reduction Unit and Serious Violence Duty funding from Home Office is a single year settlement until Mar-2026. This funding is critical to the delivery of A&S's VRP activity, including paying for key staffing roles and interventions. Serious Violence Duty – data sharing a particular challenge. Safer Streets funding ending Mar-25: no further rounds of funding available. 		<ul style="list-style-type: none"> Offenders fail to be brought to justice in a timely manner, or at all. If convicted they may not receive/serve sentences which match public expectations. This damages confidence in the CJS and may lead to future additional harm to victims and the wider public. Governance failure as a duty of the PCC (SR1). Failure to deliver the Police and Crime Plan (SR2). Failure to deliver a whole systems approach to crime and continue the 'revolving door' of offending and victimisation. Failure to deliver value for money. Reduced ability of responsible authorities across A&S to effectively deliver their statutory obligations under the Serious Violence Duty and loss of an A&S wide approach. Sudden end or reduction of services and interventions funded by the A&S VRP structure causing gaps resulting in vulnerable young people not being supported and incidents of serious violence increasing. 				
MITIGATION						
Controls	Review date	Owner	Commentary / Controls updates			
<ul style="list-style-type: none"> Violence Reduction Partnerships (VRPs) facilitated by VRP Directorate of OPCC. Serious Violence Duty governance. Partnership Strategy. Governance of Community Safety Plans. A&S Reducing Reoffending Board and Strategy. Combatting Drugs Partnerships. PCC chairs the Local Criminal Justice Board. PP&C team have leads for victims, CJS and reducing re-offending. OPCC continue to be represented at CSPs. Regular meetings (outside of Boards) with LA chairs/CEOs. Information sharing relevant to all partnership working; particularly CJ, reducing reoffending and VRPs. National reviews of sentencing (Gauke), courts (Leveson) and prisons (Timpson) to improve the CJS issues. 	Apr-25	VRP Director	<ul style="list-style-type: none"> VRP structure in place with roles filled. SV Duty governance in place. Convening function for the SV Duty at A&S level will be managed by VRP Directorate. A draft sustainability plan has been developed following HO announcements over funding. Planning for work delivery for 2025/26 is underway with the spokes and a deadline of 30th March for the Delivery plan is being worked towards Formal notification of a 1-year roll over of VRU grant and SV Duty grant funding has been received for the year 2025/26. Partnership Strategy 'as is' review complete. This will now be taken forward as part of the development of the Police and Crime Plan implementation plan (OPCC and partner pillars). Need to improve OPCC oversight of these plans but that has to be considered in the context of the national CSP review which is now on hold pending White Paper on police landscape reform. CSPs provided feedback on draft A&S RR strategy. A further development session will take place in Feb-25 to discuss this feedback and reflect on the updated Local Government Association policy paper. 5 CDPs went live in Sept-22. Aligned to local authorities and reporting to their boards. 			
		Apr-25	Director of P&P			
		Apr-25	Director of P&P			
		Mar-25	Director of P&P			
			Director of P&P CoS CoS Respective Strategic Groups CoS			

AVON & SOMERSET CONSTABULARY

CORPORATE RISK

QUARTERLY REPORT – Q4 2024/25

JANUARY TO MARCH 2025



Corporate Risk Report

The Constabulary manages risk at two levels.

Corporate Risks – These are seven static strategic risks updated quarterly and reported via the Joint Audit Committee.

Organisational Risks – These are tactical risks identified by Directorate and Departments and managed through the formal Governance Framework at Constabulary Management Board, Committee or local Directorate / Department Leadership meeting depending on the level of mitigated risk.

This report provides a quarterly overview of Corporate Risks for the Joint Audit Committee.

Report Title	Corporate Risk Report
Period covered	Q4 2024/25
Date of report	28/02/25
Report author	James DAVIS (PMO)
Joint Audit Committee date	11/03/25

Part 1 – Corporate Risk Management approach

Part 1 describes the overall approach to Corporate Risk Management developed and implemented by the Portfolio Management Office (PMO).

The PMO seeks to mature the organisational approach to Corporate Risk. The seven Corporate Risks were reviewed with Chief Officer Group leads as part of the annual review process in Q1 2024/25. The PMO has revisited the Corporate Risks and risk record management looking to achieve the following:

- Ensure the Corporate Risks are described as outcomes as opposed to the failure of any local processes.
- Ensure the causes of all Corporate Risks are clear.
- Ensure that completed mitigations are evidenced.
- Ensure that new mitigations for the next quarter are identified.
- To reflect mitigations as “risk controls”.
- Ensure the risk mitigation score (Likelihood versus Impact) is reviewed and updated.
- Ensure the risk mitigation score is driven by defined measurable controls.
- Ensure the trigger points for changes in risk scores are objective and clearly articulated.

Through the identification and tracking of quantifiable risk controls, risk mitigations have become objective, and it is possible to begin to include risk forecasts and projections.

Part 2 – Corporate Risk overview

Part 2 provides an overview of the mapping of the Corporate Risks based on mitigation scores based on the 5 x 5 matrix.

The current Corporate Risk assessments (as of February 2025) are as below.

Corporate Mitigated Assessments		Risk Value	Impact				
			Negligible (1)	Minor (2)	Moderate (3)	Significant (4)	Severe (5)
Likelihood	Very likely (5)						
	Likely (4)					People	
	Possible (3)			Governance	Service Information Governance (IG) Infrastructure	Finance Confidence	
	Unlikely (2)						
	Very unlikely (1)						

Part 3 – Corporate Risk projections

Part 3 provides a summary of projected Corporate Risk assessments for the next 12 month period.

The Corporate Risk projections (mitigated risk score) are captured below and reflect the current assessment of risk management controls and expected progress against their measures. The grid below provides a summary overview. Additional information is provided on the individual Corporate Risk Records (records referenced with a PR number).

Constabulary Corporate Risk Roadmap – Q4 2024/25 update
Joint Audit Committee

Providing a high level overview of the Constabulary Corporate Risks, risk mitigation scores, headline activity and future risk mitigation projections.

Constabulary Corporate Risk Roadmap									
Risk Reference & Title	Historic risk assessments last 12 months (mitigated values)				Risk Management Context (please refer to individual PR records for more detail)	PMO Forecast risk assessments next 12 months (mitigated values)			
	Q1 2024/25	Q2 2024/25	Q3 2024/25	Q4 2024/25		Q1 2025/26	Q2 2025/26	Q3 2025/26	Q4 2025/26
PR/735 Finance	15	15	20	15	Potential for lower risk towards latter part of 2025/26 if medium term savings plans are developed.	15	15	15	10
PR/736 Service	12	12	12	12	Reduction in risk is linked to the formal closure of HMICFRS performance AFIs – potentially achievable later in year.	12	12	12	8
PR/737 People	15	15	20	20	Risk mitigation linked to updated People Survey 2025 – available from the autumn (reflecting FLL/MLL activity).	20	20	20	15
PR/738 Infrastructure	8	8	12	12	Potential for reduced risk score later in 2025/26 but this will require Capital Plan balanced for at least three years.	12	12	12	8
PR/739 Information Governance	12	12	12	12	Potential to reduce risk with increased % of Information Governance Framework Themes meeting requirements.	12	12	8	8
PR/740 Governance	9	9	9	9	Reduction in risk score linked to implementation of Post Implementation Review recommendations when known.	9	9	6	6
PR/1436 Confidence	15	15	15	15	Reduction in mitigated risk score linked to national confidence data / position.	15	15	15	15

Part 4 – Corporate Risk development activity

Part 4 provides an overview of activity supported by the PMO to continually mature and develop the Constabulary approach to Corporate Risk management and also Organisational Risk management.

The PMO has the following areas of focus for risk management in Q1 2025/26.

- **Annual Q1 review** of Corporate Risk Themes to ensure the corporate risks are still appropriate.
- The development and inclusion of a **new Corporate Risk for Digital** to provide transparency and clarity specifically for digital risks (retaining PR/739 for Information Governance).
- Ongoing identification and tracking of **new risk controls** for each risk (indirectly identified through reporting through Constabulary governance).
- Refine the process to ensure key themes from Organisational Risk Register influence Corporate Risk Assessments (noting there is not necessarily a direct read across).
- Mapping of Organisational Risks to the **Constabulary Strategic Outcomes** to help with theming and development of Corporate Risk Assessments.
- **Review of Q1 Corporate Risk assessments** in June 2025 ahead of July 2025 Joint Audit Committee.

- Identify time to development of the **risk appetite** concept (activity delayed).
- Development of **Organisational Risk Management Dashboard on VERTO** (record management) system to provide additional management information.
- Continued CPD in relation to risk management through attendance at **National Risk Management Forum** and newly formed **SW Regional Risk Management Group**.

The PMO assesses risk management currently at **Level 3 on the Capability Maturity Model Integration (CMMI)** which is described as “Defined” with risk proactively managed across the organisation. These are annual capability assessments conducted across the organisation for a range of capabilities. The last assessment was completed in November 2024.

Part 5 – Organisational Risk summary

Part 5 provides a brief overview of the Organisational Risk Register (ORR) metrics for information.

The Organisational Risk Register is managed on a continual basis by the PMO with support from Risk Super-Users and Risk Owners. The current assessment of the ORR as of 24/02/25 is as below. There are currently **198** organisational risks mapped – this number has remained relatively static for over a year – although this figure shows a **small reduction of 4** from the last reported position in December.

LIKELIHOOD 🔍		IMPACT 🔍				
	-	1	2	3	4	5
-	7	-	-	-	-	-
5	-	1	2	1	2	1
4	-	2	11	20	18	3
3	-	3	8	22	22	1
2	-	0	13	23	26	1
1	-	0	1	4	2	4

The assessment of these risks on the 5 x 5 matrix shows:

- Red RAG risks account for 13.1% of the register – an increase from 11.4%
- Amber RAG risks account for 33.8% of the register – a decrease from 37.1%
- Green RAG risks account for 53.1% of the register – an increase from 51.5%

The alignment of organisational level risks to the corporate risk themes are as follows:

- Finance – 10 risks (5.1%)
- Service – 84 risks (42.4%)
- People – 30 risks (15.2%)

- Infrastructure – 15 risks (7.6%)
- Data – 38 risks (19.2%)
- Governance – 14 risks (7.1%)
- Confidence – 7 risks (3.5%)

Joint Audit Committee have asked for details of some of the tactical themes captured on the Organisational Risk Register mapped against the Corporate Risk themes. The PMO has provided a brief overview in the table below focussing on Organisational Risks with a red RAG mitigated value. Data is taken from the QLIK Dashboard on 24/02/25. The risks highlighted here are selective. Full details of the Organisational Risk Register are available on request.

Corporate Register Risk Theme	Selective Organisational Register Risks (red RAG mitigated scores 15+)
Finance	Overtime budgets
Service	ERP implementation Backlog with DVDS Resources for ICAT
People	Representative Workforce Operational training requirements
Infrastructure	n/a
Information Governance / Data	Cyber security Generative Artificial Intelligence
Governance	n/a
Confidence	n/a

Part 6 – Report conclusions

Part 6 provides the key highlights from the quarterly Corporate Risk Report for Joint Audit Committee consideration.

- The Corporate Risks have been subject to a Q4 review with Chief Officer colleagues.
- One Corporate Risk has seen a reduction.
- PR/735 – Finance – has decreased from 20 to 15 on the 5 x 5 matrix.
- There are no other significant changes to the Corporate Risk Register from Q4.
- The Corporate Risk Register will be expanded to include an eighth corporate risk (digital) from Q1 as part of the annual PMO review of approach.
- The PMO has completed its forecast for risk mitigations for 2025/26 and there is the potential for risk mitigated values to decrease in Q3 or Q4 for several risks if the objective mitigation criteria can be evidenced.
- The Organisational Risk Register remains relatively static at circa 200 risks with the consistent discipline of risk review linked to formal governance well established.
- The Constabulary Risk Management process is assessed as being at Level 3 maturity (using the CMMI scale) – an assessment of Level 4 in the future remains realistic.

The PMO can offer additional commentary on this report and the individual Corporate Risks on request.

Part 7 – Corporate Risks – individual risk records

Part 7 provides a consolidation of the seven corporate risk records from the PMO VERTO Management System.

The records are attached in the following order:

- **PR735 – Finance** – Inability to deliver a sustained balanced budget.
- **PR736 – Service** – Failure to meet the five public outcomes and achieve required PEEL gradings.
- **PR737 – People** – Failure to develop a workforce capable of achieving our vision.
- **PR738 – Infrastructure** – Failure to develop our infrastructure assets in order to achieve our vision.
- **PR739 – Information Governance** – The Constabulary fails data management inspections or is subject to a data breach.
- **PR740 – Governance** – Business decisions are made outside of due process and without audit trail.
- **PR1436 – Confidence** – The Constabulary has decreasing public confidence survey results.

Green text reflects information repeated from previous Joint Audit Committees. Red text reflects the latest 2024/25 Q4 updates.

AVON & SOMERSET CONSTABULARY

Corporate Risk Register



Date of register 03/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR000735	Current Mitigated Score	15
Corporate Risk Title	Finance - Inability to deliver a sustainably balanced budget	Mitigated Impact Score	5
Corporate Risk Owner(s)	Nick Adams	Mitigated Likelihood Score	3
		Date of Risk Review	31/05/2025

Corporate Risk Description	Our ability to deliver quality policing services and value for money for residents of Avon and Somerset is dependent of our ability to put the Constabulary on a sustainable financial footing allowing us to invest in the needs of the present without compromising the ability to meet the challenges of the medium to longer term. Prudent financial management and sustainable investment enable the organisation to work towards delivery of its strategic objectives and also those set out in the Police and Crime Plan.
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Corporate Risk initial assessment - unmitigated risk

Unmitigated Assessment	25
Unmitigated Impact Score	5
Unmitigated Likelihood Score	5

Rationale	<p>The financial context for Avon & Somerset Constabulary includes the following:</p> <ul style="list-style-type: none"> • Since 2010/11 it has been necessary for Avon & Somerset to find more than £100M in revenue savings to balance our budgets, which is nearly a third of our size – there is no part of our organization that has not had to reduce to deliver savings. • Our financial position continues to operate in the context of the way in which funding for policing is distributed across England and Wales. For example, if you compare our funding to those forces with one of the top 10 cities as measured by population size (of which Bristol is one), we receive the lowest overall funding per head of population. If we were to receive the average of the other 9 force areas with a large city, we would receive £128.8m (33% of our 24/25 budget) more in funding each year (this would be £55.2m [14% of our budget] more if you were to exclude London). <p>The Medium-Term Financial Plan (MTFP) is updated annually to forecasts over a 5-year planning horizon. The last MTFP published in February 2024 looked out to 2028/29, while the MTFP being developed at this time looks out to 2029/30. These forecasts predict a continued increase in costs, driven by our assumptions around pay awards, pay progression of a relatively inexperienced workforce, non-pay inflationary pressures and challenges around costs of pensions. Despite the forecast increase in funding, it is clear that across the</p>
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medium term our costs will continue to outgrow our funding. On latest forecasts as set out in our draft MTFP we predict a deficit against which we have identified savings to balance the budget in 2024/25 and for 2025/26 leaving a further saving requirement for later years in the MTFP window. We recognise that savings will largely be achieved through targeted police staff headcount reduction. Our Capital Programme continues to reflect a mixture of local and national projects, and similar to our revenue forecasts, predicts increases to costs driven by inflationary pressures. Within this the cost of transitioning our fleet to electric vehicles, including the cost of managing a substantial programme of work to install charging infrastructure, is beginning to be quantified. Managing this alongside our other ambitions without the provision of additional funding will place pressure on our capital funding and require us to challenge the timing and prioritisation of some of our plans. Our reserve levels are forecast to reduce across the medium term, particularly as we use these to fund our Capital Programme.

Corporate Risk - latest assessment - mitigated risk

Mitigated Assessment	15
Mitigated Impact Score	5
Mitigated Likelihood Score	3

Rationale

Quarter 4 Risk Mitigations update

Risk PR/735 was reviewed with Nick ADAMS on 03/02/25 and considered five elements

- (1) Risk description.
- (2) Causes of the risk.
- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

(1) Description

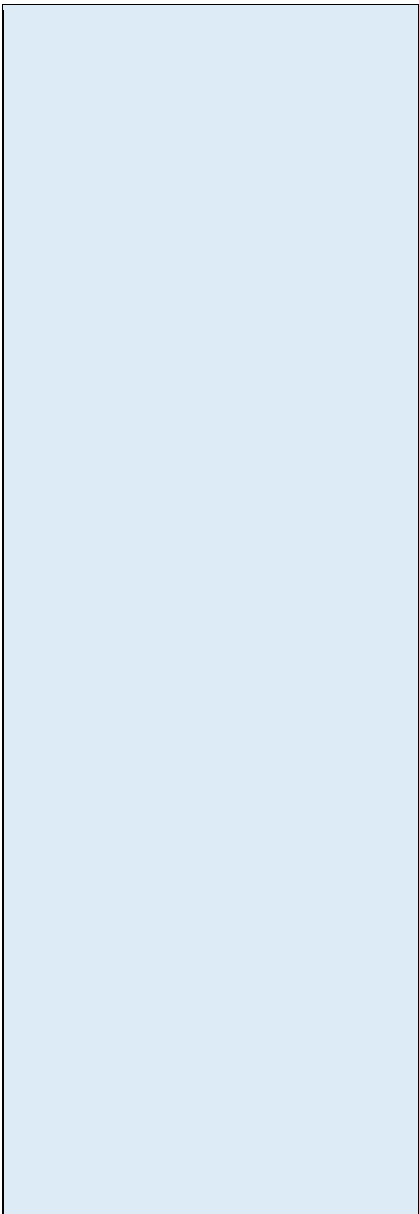
The Corporate Risk is confirmed as "Finance - Inability to deliver a sustainably balanced budget" to reflect the outcome as opposed to not adhering to local processes.

(2) Cause of the risk

The causes of this risk are associated with central government underfunding, inflation and insufficient resources to meet demand.

(3) Controls / Mitigations completed

- Alignment of Annual Financial Planning Cycle with the Constabulary Strategic Planning Cycle and Portfolio of Change.
- Comprehensive understanding of national finance landscape and key funding decision points.
- Flexible management and implementation of Police Officer Uplift numbers.
- Proactive response to the Constabulary savings challenge to identify and deliver short term savings for immediate financial years.
- Management of the Capital Plan to meet organisational objectives making use of reserves to supplement budgets as required.
- Formal submission of the 2025/26 Avon & Somerset Constabulary MTFP.



(4) Controls / Mitigations planned

- The Avon & Somerset Constabulary MTFP for 2025/26 was formally submitted late January 2025 noting a requirement to submit a amendment clarification note. The MTFP was submitted ahead of the Police & Crime Panel meeting on 04/02/25 and the endorsement of the £14 Band D Council Tax uplift, central to our MTFP modelling.
- The Constabulary has received notification of ring-fenced funding to cover increased employer National Insurance contributions for 2025/26.
- With regards to the Neighbourhood Policing guarantee, an increase in additional funding was announced 31/01/25 with the settlement for Avon & Somerset increasing to £4.6M with an expectation to spend on Officers and PCSOs but also potentially Police Staff positions - but any requirement here must be clearly articulated. Although we are therefore now a little clearer on the Neighbourhood Policing Guarantee, there is an expectation for the Constabulary to develop a proposal to draw down on the grant funding and additional clarity is required of how this process will work.
- We have only received a one year central funding settlement covering 2025/26 but are aware of plans for a Government Spending Review at some point during the 2025/26 financial year with budgets being set for the remaining years in the parliamentary term covering until 2028/29. The provision of an indicative three year forecast through the National Spending Review work is welcome.
- We have submitted our latest 2025 data to the NPCC Finance & Co-ordination Committee noting our 2024 financial management assessment of High Risk High Resilience. We are expecting an updated assessment early in March.
- Through the NPCC, we continue to raise wider funding concerns notably capital provision and the requirement for a significant increase in capital to help finance significant considerations such as the move to the Emergency Services Network and Electric Vehicles - neither of which appear affordable. We recognise our need to spend within our capital means so will flex our Capital Plan accordingly. Through a revenue lens, we are highlighting growing operating costs, increasing complex demand and that our understanding of risk may differ from core government priority areas and those assumed by the public.
- Locally we have started discussions about the next tranche of revenue savings and are considering aspects of pay and non-pay including tightening the controls on overtime spend. Proposals are being managed via the Constabulary Management Board and Strategic Planning Meeting.
- We recognise the Governance Reform Agenda and the expected White Paper in the Spring from the Commercial Efficiency and Collaboration Programme with increased scrutiny on police efficiencies. This will look to expand collaborative thinking and practice across the sector.

(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and is assessed high as 5/5.
- **Likelihood** - The likelihood score had previously revised to reflect a worsening MTFP position reflecting the cost pressures described above. However, the 2025/26 MTFP position for revenue is now balanced. Therefore, the likelihood score has been decreased back to 3. We don't yet have the detail of how the revenue gap for 2026/27 will be closed but we have commissioned work sufficiently in advance of future formal financial planning activity for now. The risk mitigation score will increase in the future if our confidence to close the 2026/27 revenue gap lessens.

Earlier assessments

Mitigated risk score Q1 2024/25
Mitigated risk score Q2 2024/25
Mitigated risk score Q3 2024/25

15
15
20

Mitigated risk score Q4 2024/25

15



Date of register 12/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR000736	Current Mitigated Score	12
Corporate Risk Title	Service - Failure to meet the five public outcomes and achieve required PEEL grading	Mitigated Impact Score	4
Corporate Risk Owner(s)	Jon Reilly	Mitigated Likelihood Score	3
		Date of Risk Review	31/05/2025

Corporate Risk Description	<p>When we consider the expectations of policing from the public and current government, we recognise they expect improvements to be seen on the back of investment in policing following years of austerity. When we consider that over the last 5 years precept (council tax contribution) has increased 35%, with the backdrop of the 'additional' 20,000 new police officers pledged by the government and the media attention and public opinion of policing in the past few years, scrutiny of what we do has never been as fierce.</p> <p>The organisation has achieved its Police Officer Uplift numbers, exceeding it in fact, to support the National imperative to achieve 20,000 new officers. Where we have not yet seen the benefit is where our new officers are still in their initial period spent in Response policing, meaning we haven't yet been able to fill new posts created through uplift. We also continue to manage the abstraction of new officers who require to undertake studies for their degree programme. We are also acutely aware of the requirement for savings that policing will need to deliver in the coming years, which is leading the organisation to review its savings requirements and uplift plans, while at the same time delivering services within the financial envelope, we have available.</p> <p>The Strategic Policing Requirement (SPR) sets out the Home Secretary's view of what the current national threats are, and the national policing capabilities needed to counter those threats. The 2023 version introduced violence against women and girls as an additional national threat and reaffirms the validity of the existing threats. The inclusion of violence against women and girls as a national threat sets clear expectations for local and regional police capabilities to tackle violence against women and girls and how local forces work with others, including collaborating with other agencies.</p>
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Corporate Risk initial assessment - unmitigated risk

Unmitigated Assessment	20
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Unmitigated Impact Score
Unmitigated Likelihood Score

5
4

Rationale

Our priorities are set out through various national frameworks and local priorities, which mean we continue to have a large number of expectations placed on us. At present these numerous plans remain complimentary of each other, but in light of organisational growing pains, it may become necessary to prioritise and focus on specific areas of improvement. We continue to manage challenges with non-core demand (calls for service relating to non-crime incidents). Additional data also tells us that a large percentage of officer time at scene relates to non-crime incidents. We previously sent a Task Force to visit Humberside Police to understand more on their approach called 'Right Person, Right Care'. This reflects the National Police Chiefs Council national approach to 'Right Care, Right Person' to help Forces reduce the number of deployments in respect of specific types of calls relating to mental health and concern for welfare. This will help Police Staff in Control Rooms focus, from the outset, on getting the right person and agency, with the right skills, training, and experience to respond to the incident. We continue to be in dialogue with local partners and stakeholders as we seek to introduce RCRP having adopted a more cautious approach than other Forces to ensure the public were not adversely affected by the changes. Programme #1 as part of our Constabulary Portfolio of Change will look to deliver our solutions here. We recognise the synergy between the other corporate risks and this one, mainly when scrutiny of the police culture, behaviour and incidents of misconduct in a public office has been well documented. We have seen referrals to our Professional Standards Department increase, aligned with media coverage of conduct in other police forces. The Constabulary currently has its highest level of suspensions due to ongoing investigations. There is an intrinsic link to these factors underpinning the public's trust and confidence in our service delivery. It is reasonable to expect misconduct cases to increase as the organisational culture evolves and we root out attitudes and behaviours that do not align with our values. We have created an additional seventh Corporate Risk (reference PR/1436) to reflect this.

Corporate Risk - latest assessment - mitigated risk

Mitigated Assessment
Mitigated Impact Score
Mitigated Likelihood Score

12
4
3

Rationale

Quarter 4 Risk Mitigations update

Risk PR/736 was reviewed with DCC REILLY on 12/02/25 considered five elements

- (1) Risk description.
- (2) Causes of the risk.
- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

(1) Description

The Corporate Risk should be reframed to "Service - Failure to meet the five public outcomes and achieve required PEEL grading".

(2) Cause of the risk

The Constabulary is unable to efficiently manage increasing demand. There are inefficient process. There are challenges with an a relatively inexperienced workforce in some parts of the business. There is an inconsistent approach to the delivery of core policing services.

(3) Controls / Mitigations completed

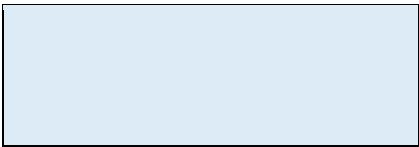
- Performance priorities are defined within the Constabulary Performance Control Strategy and routinely reported via the IPQR product at the monthly Constabulary Management Board highlighting progress and areas for improvement as required.
- The Constabulary provides transparency in terms of its national / Most Similar Group (MSG) performance for key metrics via the quarterly Specified Information Order returns.
- The commencement of activity to develop the first Constabulary Workforce Plan (contingency planning, skills gaps).
- The definition and implementation of the Seasonal Demand Plan for 2024 as below.
- Seasonal summer demand this year has been managed similarly to 2023 starting with an Operation RESET and with Response and NPT dealing with BAU and incoming demand. This year NPT are not being deployed outside of their LPAs. Operations are supporting with daily demand, prison recalls, most wanted and public order incidents. Three days per week CID join Patrol to deal with incoming demand.
- As of August, immediate attendance has remained relatively stable so far this summer at 79.4%, however, priority attendance has worsened and is at 56.2% currently. The Force has also been in Demand Level 2 at the start of July and continued for a three-week period to the end of July. Tactical options were put in place to assist with the demand levels.
- The summer demand period has included unexpected demand from protests and riots. Twelve hour shifts were implemented for all Police Officers and Operational Staff were asked to volunteer to extend their shifts. SLAs and the demand level were maintained at their usual levels through the period of extra demand created by the protests and riots.
- The recognition of technological solutions to address aspects of demand management (e.g. telephone upgrades, exploring the potential of voice analytics, the development of artificial intelligence through STAR bids).
- The implementation of a Constabulary Portfolio of Change (8 x Programmes) to deliver outstanding policing.
- The first phase of the Right Care, Right Person initiative went live in the Constabulary in July and already we are seeing a significant reduction in the number of calls attended by frontline uniformed officers putting much needed capacity back into the system. The reduction in logs attended is being monitored and recorded to quantify the saving.
- Mental Health Link Officers have been reintroduced into Ambulance Control rooms 24/7 and also have a positive impact on reducing the number of Mental Health calls response colleagues are attending. The initiative is now also funded 50% by the Integrated Care Boards across the Force areas.
- Call scripts have been reviewed and improved resulting in the average length of calls reducing and creating more system wide capacity.
- The switchboard function in the Control Room has been altered to provide greater availability of call handlers combined with a temporary uplift of 25 x Call Handlers to allow technological solutions to be implemented. These changes have seen strong improvements in 999 call answering and abandoned rates for 101.
- Of the 17 HMICFRS AFIs from 2022, the status (as of July 2024) is 3 x Improving, 5 x Work Ongoing, 9 x Closure Pending. Eleven of these HMICFRS AFIs have now been submitted for filing and a further four will be submitted by the end of September showing a step change in performance.
- Constabulary HMICFRS PEEL Presentation delivered in August complementing earlier document submissions and fieldwork.
- October Strategic Planning Meeting used to seek consensus views of the approach the Constabulary will take to manage HMICFRS AFI recommendations on receipt from the 2024 PEEL Inspection Cycle.

(4) Controls / Mitigations planned

- We continue to use our monthly Constabulary Management Board to review progress against our performance priorities. The latest analysis (from January 2025) reports stable performance for Investigative Standards, Response Timeliness, Crime Prevention and Protecting the Vulnerable with strong performance improvement for RASSO.
- Our First Point of Contact Call Handling continues to improve - we are now ranked 7th nationally for our 999 performance and the 101 abandonment rate is routinely below 10% (only 3% for February).
- We recognise the role that the Constabulary Change Portfolio and associated projects will continue to play. Enhanced Video Response (EVR) has now been rolled out Forcewide improving satisfaction outcomes for victims and reducing workload for Response Officers. We are formalising our plans for investment in the E-BIT software to help with our initial crime assessment and allocation. A Final Business Case is being prepared for consideration via governance routes in February / March. We continue with our Proof of Value activity for SOZE software which will provide efficiencies with the processing of investigative source materials and make quick time data links. An interim SOZE Benefit Assessment Report is due at the Portfolio Steering Board in April.
- We recognise areas of service delivery where performance needs to improve - these include areas such as Internet Child Abuse Case backlogs, processing of Domestic Violence Disclosure Scheme applications (we have introduced some automated processes here to improve efficiency) and Offender Management. For these areas we have made recent business decisions (end of 2024) to invest resources and can already evidence performance improvements. The number of Registered Sex Offender ARMS assessments has reduced from 22% to 15%, the number of outstanding RSO visits has reduced from 18% to 11% and the number of Offender Managers with a caseload of over 50 has reduced from 12 to 8. We have GOLD Groups in place to provide scrutiny of performance delivery for these areas.
- Recognising specific feedback from the HMICFRS PEEL Inspection 2024 in relation to our Operating Model, we have commissioned a new Programme of Work as part of our revised Constabulary Change Portfolio. We are developing a Stage 1 Concept Report for initial shaping of the work at the February Portfolio Steering Board. Monthly updates have been scheduled for the revised OPCC Governance & Scrutiny Board starting 13/02/25. Additionally, we have a Project focussing on interim geographic solutions covering Talk Group alignments, considerations for the Tactical Firearms Commander and Force Duty Officer roles and a pilot for Patrol attending Code 1 and 2 calls only with a separate investigative function. These proposals will be presented as a Stage 4 Continuous Improvement Paper at the March Portfolio Steering Board.
- We are responding to the Neighbourhood Guarantee award central government noting we will receive £4.6M for 2025/26 to uplift Neighbourhood resources. We are working hard to understand how to deliver the maximum additional capacity for Neighbourhood Policing. Planning activity has commenced early February. We are recommended PCSO recruitment.
- This corporate risk is based on delivering against five public outcomes. We have revised our Performance Control Strategy and Performance Framework to focus on these outcomes. The revised approach was introduced at our Leadership Days in January and February and the framework will provide accountability at strategic through to Team level. The Strategic Framework is to be presented at the February Constabulary Management Board for review with the Tactical / Team Level Framework due for presentation at March Constabulary Management Board.
- We have received our formal HMICFRS2024 PEEL Inspection grading of "Requires Improvement" with associated 16 Areas for Improvement. Our governance processes for managing these AFIs is strong. We have introduced a new HMICFRS Recommendations Steering Group to move AFIs to a point of formal closure (via HMICFRS evidence submission) sooner. Each AFI has been aligned to a formal part of the Constabulary Governance Framework / GOLD Groups for scrutiny of progress and delivery.

(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and assessed as 4/5 given the primacy of any AFI's identified through the formal HMICFRS process.



- **Likelihood** - The likelihood score of 3 remains for now. The likelihood assessment will continue to be directly linked to the PEEL Inspection Outcomes and AFIs. We note our 2024 assessment of "Requires Improvement" but have introduced strong governance processes to ensure we appropriately expedite AFI closure. When the performance AFIs are formally closed, this provides an evidence base to reduce the likelihood score to 2 - but for Q4 2025/25, the likelihood remains as 3.

Earlier assessments

Mitigated risk score Q1 2024/25
Mitigated risk score Q2 2024/25
Mitigated risk score Q3 2024/25
Mitigated risk score Q4 2024/25

12
12
12
12



Date of register 25/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR000737	Current Mitigated Score	20
Corporate Risk Title	People - Failure to develop a workforce capable of achieving our vision	Mitigated Impact Score	5
Corporate Risk Owner(s)	Louise Hutchison	Mitigated Likelihood Score	4
		Date of Risk Review	31/05/2025

Corporate Risk Description	If we fail to, properly and at sufficient pace, institutionalise inclusion by embedding the right leadership and culture throughout the organisation while effectively managing unprecedented workforce growth, development and change, trust and confidence of the public, our partners and colleagues will drop, performance will falter and our legitimacy to protect and serve will be eroded.
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Corporate Risk initial assessment - unmitigated risk

Unmitigated Assessment	20
Unmitigated Impact Score	5
Unmitigated Likelihood Score	4

Rationale	<p>There are 3 headline areas where our risks assessment is focused, these are:</p> <p>Unprecedented growth and a changing workforce composition:</p> <ul style="list-style-type: none"> The high logistical exercise of attracting, vetting, conducting medicals, inducting and on-boarding, training, tutoring, posting and supporting the high numbers of new and inexperienced officers places record demands on our enabling services such as Recruitment and HR, Training and Tutors, Vetting, Occupational Health and others and entails significant collaboration and coordination between operational and enabling services and our HEI partner to deliver the numbers on time and effectively. The level of abstraction of PCDA and DHEP officers while undertaking their studies alongside performing their police officer roles. Recruiting to target officer numbers does not immediately translate to a fully deployable officers on the front line and as a result our response timeliness rates are impacted. A more experienced, deployable workforce will happen, but it will take time to achieve.
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- The growth in officer numbers does not immediately translate to the growth in specialist areas we want to grow. This is true across all specialist areas and is particularly the case as we build our investigative capacity and capability. We have plans in place to realise this specialist growth, but again they will take time to fully realise. As a result, our overall positive outcome rate remains too low, reflecting the continued efforts we need to make in improving investigative standards as we build capability.
- The changes introduced this year through the Attorney General guidelines for disclosure and the Director General guidelines for charging have created additional pressures on front line officers and staff. Un-addressed this has the potential to significantly impact on officer and staff capacity, undermining the benefits of officer Uplift. We are working with other forces to highlight these concerns and seek pragmatic solutions.

Attraction and retention in an increasingly challenging marketplace:

We are seeing locally and nationally increases against the projected leaver rates for police officers

- A number of roles have become ‘harder to fill’ as the pay rates in the market have risen quite rapidly and a lot in some areas, particularly where there are shortages for in-demand technical skills
- Many have talked about the impact of the pandemic on ‘the great resignation’ linked to employees re-evaluating what they want from their work and work/life balance
- Public sector pay has been relatively stagnant for some time with it be argued that police officers especially have fallen behind compared to cost of living increases and pay in other roles that are less complex, risky and demanding
- The attractiveness of policing as an ‘employer’ has taken a hit alongside wider trust and confidence following the widely publicised incidents of serious misconduct and concerns about sub-cultures in policing. This has a suppressive effect on our ability to recruit, especially from under-represented communities in whom there is already a trust deficit, and it also potentially dents morale and the ability to retain.

Institutionalising inclusion, investing in leadership and culture:

- Serious questions have arisen about policing culture and leadership against the backdrop of declining public confidence in wake of a series of misconduct cases nationally and stubborn inequalities in the police workforce and service delivery
- Increase in volume and seriousness misconduct referrals/reporting and misconduct cases locally
- Stubborn disparities in workforce experience and service delivery adversely affecting under-represented communities especially and adding to a trust and confidence deficit; understandable concerns about the relative glacial pace of change in some areas/aspects of our work
- Growing levels of consciousness, internal and external activism, on the issues and impacts associated with inequality and discrimination, diversity and inclusion deficits
- Concerns from some that there is too much negative focus on the “<1%” and that this will dent morale of the majority
- A lack of understanding and acceptance in some quarters that there are deep systemic and institutional roots that also need confronting in a systemic way
- High levels of scrutiny and media attention to these issues
- Some reluctance and challenges in engaging all parts of the workforce in learning the knowledge and competencies we expect them to have in order to be able to promote an inclusive culture
- Impacts of wellbeing and procedural justice on behaviour
- Questions about the effectiveness and rigour of our recruitment/selection processes in identifying, predicting and addressing those who do not demonstrate the right values and behaviours joining policing
- Questions about the capacity of our internal professional standards, counter corruption, complaints and grievance management capabilities to meet need and demand
- Questions about the maturity and extent of our ability to use our data effectively to identify patterns or early warning signals to enable targeted and tailored intervention

Mitigated Assessment
Mitigated Impact Score
Mitigated Likelihood Score

20
5
4

Rationale

Quarter 4 Risk Mitigations update

Risk PR/737 was reviewed with Lou HUTCHISON on 24/02/25 and considered five elements

- (1) Risk description.
- (2) Causes of the risk.
- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

(1) Description

The Corporate Risk should be reframed to "People - Failure to develop a workforce capable of achieving our vision" through not growing, developing and maintaining our workforce.

(2) Cause of the risk

Leadership is ineffective. There is a lack of Workforce Planning. There is an inadequate welfare / support offer. There is insufficient support in terms of staff development.

(3) Controls / Mitigations completed

- Programme #4 as the delivery vehicle for key deliverables including the Occupational Health Review and Strategic Workforce Planning.
- The implementation of the Occupational Health Business Case has enabled the unit to recruit to its identified vacancies.
- The implementation of the First Line Leadership Programme.
- The completion of the Recruitment Improvement Project.
- The initial development of Mid Line Leadership proposals.
- Performance & Insight Committee Performance Report including comprehensive metrics for key performance indicators such as TRIM offers, sickness trends and completion of mandatory College of Policing courses.
- The development of the Wellbeing Strategy
- The developing role of the People Committee to manage initiatives noting the annual review of the Terms of Reference in July.
- Establishment of the Senior Leadership Group (SLG) as a cohesive forum for presenting, consulting and cascading key messages in relation to people development.
- The continued introduction of the Trauma Informed approach -16 cross-Directorate educators have been trained, and this has been complemented by a Trauma Informed toolkit and Train the Trainer training.

(4) Controls / Mitigations planned

- The risk describes maintaining our workforce and we can demonstrate updated activity / mitigations here. We remain on track to exceed our recruitment target for Police Officers for March 2025 - we have a target of 3351 under the Police Maintenance Programme - noting our local requirement to exceed our Avon & Somerset figure to mitigate under-recruitment by the Metropolitan Police Service. Our ability to achieve our target reflects the collaborative work between our Workforce Planning and Recruitment Teams.
- We are also using our Workforce Planning and collaborative skills to manage the requirement to implement the recently announced Neighbourhood Guarantee.
- Police Officer retention remains stable noting that nationally there is an increase in Police Officer leavers reported. Police Staff numbers continue to see a reduction in areas where we are looking to realise savings.
- We maintain our strong organisational wellbeing offer. 700 NHS Health Checks were offered to staff throughout the winter - 2456 flu vouchers were issued - up 24%. The Health Checks were held across the Force area covering all shifts including weekends. We continue to use Oscar Kilo vans and wellbeing dogs and signpost staff to our wellbeing services. We have 55 Mental Health First Aiders with 43 active. We have 43 wellbeing single points of contact (SPOCs). We have 168 Welfare Officers providing support for grievances and disciplinarys.
- We have received the UWE Evaluation of our First Line Leadership Programme. The feedback is positive recognising the good content but providing recommendations that some content could be stripped back allowing for more time for reflective practice during course delivery. We will look to introduce a more modular approach recognising a 5 day abstraction can be a significant commitment. This feedback is also influencing the development of the Mid Line Leadership Programme. We have seen 735 course attendees completing the First Line Leaders Course over the last 12 months. We ran the Mid Line Leaders pilot in January with the second cohort starting in February and other 10 cohorts planned for 2025.
- Recently we have launched our Senior Leadership Programme called Elevate - this is aimed at Superintendent and Chief Superintendent rank. The first sessions have been held. Course content has been linked to College of Policing materials. Module 1 relates to Leading and Managing Organisational Change. Module 2 relates to Creating a Performance Enhancing Culture.
- The Sergeant Inspectors Promotion Process has now launched. The Inspector process is now live with applications closing in mid-March. Virtual briefings have been given to Sergeants.
- We continue to review our people processes with effective scrutiny through our People Committee. The recent February Committee saw decisions in relation to moderated duties and shift patterns. The meeting is comprehensive and continues to mature.
- We have completed our Leadership Events held in Bristol and Taunton in January and February with over 800 leaders as attendees. The sessions covered the themes of service leadership, organisational change, innovation and progress in releasing capacity back into the organisation.

(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and assessed as 5/5.
- **Likelihood** - The likelihood score has been reviewed reflecting the People Survey results published in the autumn on 2024. The key metrics of low turnover and staff sickness remain but we have seen a drop in engagement and recognise workload pressures for some of our core frontline policing teams. The survey shows two clear pictures - more engagement from colleagues in Enabling Services and less engagement from operational colleagues. We will continue to use FLL and MLL interventions to address this and then check progress with updated outcomes from the People Survey in 2025. Therefore, the likelihood score was increased from a 3 to a 4 in Q3 2024/25 and is unlikely to change until the new People Survey data is available later in 2025.

Earlier assessments

Mitigated risk score Q1 2024/25
Mitigated risk score Q2 2024/25
Mitigated risk score Q3 2024/25
Mitigated risk score Q4 2024/25

15
15
20
20



Date of register 03/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR000738	Current Mitigated Score	12
Corporate Risk Title	Infrastructure - Failure to develop our infrastructure assets in order to achieve our vision	Mitigated Impact Score	4
Corporate Risk Owner(s)	Nick Adams	Mitigated Likelihood Score	3
		Date of Risk Review	31/05/2025

Corporate Risk Description	<p>Our infrastructure should enable the delivery of our vision to deliver outstanding policing for everyone. It is therefore important that our infrastructure, assets, and services achieve this and are developed sustainably, in a way that is mindful of our financial, political, social and environmental landscape and, in a way that offers value for money. For clarity, this risk focuses on infrastructure, which includes our physical assets (buildings, fleet, equipment, uniform) and facilities, as well as the specialist services that provide and maintain those assets. It also encompasses a range of professional services that support our operational directorates. Our IT infrastructure is also a critical enabler of our success, but it is outside the scope of this risk as it is reflected within Corporate Risk - Digital and Data.</p>
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Corporate Risk initial assessment - unmitigated risk

Unmitigated Assessment	20
Unmitigated Impact Score	5
Unmitigated Likelihood Score	4

Rationale	<p>Officers, staff and volunteers need to be able to count on having the working environment, tools, equipment and information available to them do their jobs effectively. Geopolitical issues are affecting the global marketplace and supply chains, causing challenges for us in securing the infrastructure we need to function as a Police service.</p> <p>Estate</p> <p>Since the pandemic we have moved a significant proportion of our staff (c.1600) to blended working, with a hybrid of home and office working. This change in our ways of working impacts on our estates usage, providing some opportunities while also requiring us to think</p>
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about what our people need from their office environment. These considerations are reflected in our estates strategic plan, presented to the Constabulary Management Board in August 2023, and to the PCCs Governance and Scrutiny Board in September. The cost of our buildings has increased significantly, driven by inflationary pressures on the costs of utilities and in the cost of business rates following the changes which were implemented with effect from April 2023. We have some specific challenges within our estate which are informing our forward plans. In particular we are progressing decisions in relation to our estate in South Somerset (Yeovil and Chard) after a period of indecision. We know this is important both in terms of providing reassurance to our communities about our presence in this area, as well as to provide positive progression for the morale of our officers and staff based here. We are also at various stages of project delivery around our estate in Bath, Central Bristol (Trinity Road), South Bristol (Broadbury Road) and Minehead. Our estate will also need to support the infrastructure required to charge electric vehicles as we gradually transition to these over the coming years.

Vehicles

The market for vehicles is undergoing substantial change, coinciding with global and more local supply chain challenges. Prior to the conflict in Ukraine, we were already seeing some challenges presented from the shortage of semi-conductors, and the early stages of manufacturers plans to end production of internal combustion engine (ICE) powered vehicles. The conflict in Ukraine has only added to these challenges, which means lead time for new vehicles is often many months and for parts is also proving to be a challenge. We have seen improvement in manufacturing of vehicles, but reliable delivery and conversion for policing purposes remain a challenge.

As a result of incidents concerning BMW police vehicles with certain engines, we removed a number of these vehicles from operational use in Spring 2022. This presented acute challenges in relation to specialist operations roles. These challenges remain but have eased as replacement vehicles have been introduced into the fleet. Over the medium term we recognize that it will be necessary to transition our fleet gradually to alternative fuel, with the majority expected to transition to electric by 2030, reflecting the pace at which the market is transforming its manufacturing capabilities. This will require significant investment in charging infrastructure, as well as careful management around training and operational deployment all of which will need to be effectively co-ordinated.

Uniform and equipment

There continue to be supply chain challenges requiring ongoing management in relation to the provision of uniform and equipment. This does not necessarily present consistently, with some items being more readily available and others less so from time to time.

Corporate Risk - latest assessment - mitigated risk

Mitigated Assessment	12
Mitigated Impact Score	4
Mitigated Likelihood Score	3

Rationale

Quarter 4 Risk Mitigations update

Risk PR/738 was reviewed with Nick ADAMS on 03/02/25 and considered five elements

- (1) Risk description.
- (2) Causes of the risk.

- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

(1) Description

The Corporate Risk should be reframed to "Infrastructure - Failure to develop our infrastructure assets in order to achieve our vision" to reflect the outcome as opposed to not adhering to local processes.

(2) Cause of the risk

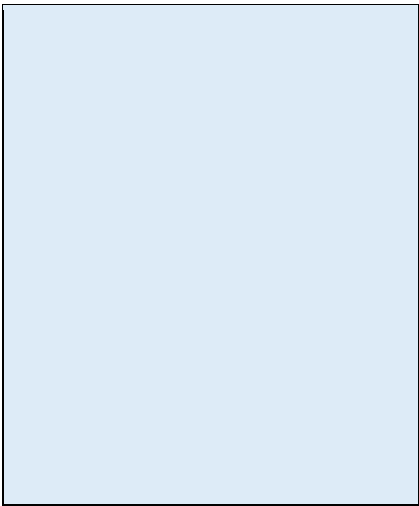
Causes of this risk have been identified as insufficient capital funding, market pressures, inefficient local processes and availability of local resources.

(3) Controls / Mitigations completed

- The significant future changes for our Infrastructure and Fleet delivery have been mapped to Constabulary Portfolio delivery vehicle under Programme #8.
- We have progressed through a number of Project Stage Gate Reviews for significant projects such as Bristol ('Trinity Road'), Bath ('Plymouth House'), Yeovil ('Horsey Lane') plus consideration of a number of strategic options for HQ. These are managed through joint Constabulary and OPCC governance arrangements (Outline Business Cases for Bath and Yeovil have been approved in the summer 2024).
- Building utilisation metrics are now readily available and reported through the Finance & Asset Committee.
- A Building Users Survey has been developed to help with the consistent reporting of Estate Project benefits information.
- New estate developments are cognisant of our trauma informed strategic imperative (Trauma-Informed checklists).
- We can demonstrate high levels (90%+) of fleet availability through the management of our fleet by Transport Services.
- We are committed to sustainable solutions where appropriate and are standing up a Programme of Work in support of vehicle electrification.
- Estates Capital Planning continues to flex over a five-year period to meet changing needs.
- The Constabulary is well placed to ensure alignment of infrastructure activity to the priorities of the new Police & Crime Plan.
- Programme #8 is beginning to develop regional collaboration plans for HQ.
- A number of Project Stage Gate Reviews approved during the autumn (Almondsbury Feasibility, Force Collisions Investigation Unit accommodation, SW Forensics Digital Forensic Unit accommodation).
- Implementation and adherence to National Fleet Maintenance Standards.
- Reprofiting of the Capital Plan and Estates Roadmap to ensure sufficient funding for approved Projects.

(4) Controls / Mitigations planned

- The Capital Plan provision (included with the MTFP) was presented at the January 2025 Strategic Planning Meeting. This models capital spend of £24.3M for Estate Projects and £10.2M for Fleet Projects covering the period 2025/26 to 2029/30. The Capital Plan is largely balanced for the next two years (there is a small deficit for 2026/27).
- We have continued to successfully progress a number of Estate Projects on the Constabulary Portfolio of Change. These include the opening of a new Police Station at Minehead, the refurbishment of Chard Police Station and the major works at Bristol Broadbury Road. All three of these projects are expected to formally close at the April Portfolio Steering Board on 24/04/25 (with continued benefit tracking by the Portfolio Management Office). Additionally, the Forensic Collisions Investigation Unit has relocated from Almondsbury to HQ in February.



- Final Business Cases for Yeovil Horsey Lane and Bath Plymouth House are still expected for the spring / summer.
- The December Portfolio Steering Board included a briefing of on the Electrical Vehicle Charging Infrastructure and updated Delivery Plan. There is a clear 2025 Roadmap with two Outline Business Cases due (Pilot Rapid Charging - May 2025 and EVCI Forcewide Infrastructure - December 2025).
- Regional conversations continue with fleet management around the sharing of best practice to develop telematics data and ensure closer procurement alignment across the South West region.
- We recognise emerging considerations in relation to the fleet insurance market whereby a recent procurement tender process attracted only one bidder with premiums increasing by 96% - this reflects market conditions and local operational challenges.

(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and assessed as 4/5.
- **Likelihood** - The likelihood score remains as 3 for Quarter 4 based on the updated capital position which is balanced only for 2025/26. The likelihood risk score can be reduced to 2 once a balanced three year budget is reported and reduced further to 1 once a balanced five year Capital Plan is presented.

Earlier assessments

Mitigated risk score Q1 2024/25

Mitigated risk score Q2 2024/25

Mitigated risk score Q3 2024/25

Mitigated risk score Q4 2024/25

8
8
12
12

AVON & SOMERSET CONSTABULARY

Corporate Risk Register



Date of register 24/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR000739	Current Mitigated Score	12
Corporate Risk Title	Information Governance - The Constabulary fails Information Governance inspections or is subject to a data breach	Mitigated Impact Score	4
Corporate Risk Owner(s)	Ellena Talbot, Catherine Karlson	Mitigated Likelihood Score	3
		Date of Risk Review	31/05/2025

Corporate Risk Description	<p>The Information Governance Framework provides the parameters for effective information management. Information is a critical asset for the Constabulary and significant investment has been made to facilitate operational use of information. Effective and innovative use of information will be critical for the force to deliver its vision of outstanding policing for everyone and show sustained improvement against the four priorities in the Police and Crime Plan 2021 to 2025. In order to fully realise the ambition to be an information-driven organisation, officers and staff need easily accessible, trusted data and analytics with clear purpose to help make evidence-based decisions to drive internal and public-focused outcomes. The recent Data Strategy and Roadmap for change, co-developed with an external partner, outlined the recommended steps for the force to continue on this trajectory of pushing boundaries and innovating with data and information. However, the Strategy also recognised the increasing demand on Information Governance & Data Ethics, and related functions, to ensure innovation is secure, ethical and compliant.</p>
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Corporate Risk initial assessment - unmitigated risk

Unmitigated Assessment	20
Unmitigated Impact Score	5
Unmitigated Likelihood Score	4

Rationale	<p>Avon & Somerset Constabulary has a successful track record in using our data and information to build insight and inform decision making – democratizing this through the provision of tools to all officers and staff across the organization. However, we recognize that this has been achieved despite the complex data and information architecture we have in place, where data is held in multiple systems – thereby compromising our ability to confidently build a single view of the data and information we hold to inform our decision making and planning activities. Data and information literacy across the organisation is improving but will continue to remain an area where we will want to do more to fully realise our ambition to become more data and information driven as an organisation. The Constabulary has</p>
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made strong investment in future technologies such as advanced analytics, robotics and automation. However, the aforementioned foundational issues may pose obstacles to the success of innovative techniques. We also recognise the challenge posed by the evolution of Artificial Intelligence and the continued threats relating to data and information security.

Corporate Risk - latest assessment - **mitigated risk**

Mitigated Assessment	12
Mitigated Impact Score	4
Mitigated Likelihood Score	3

Rationale

Quarter 4 Risk Mitigations update

Risk PR/739 was reviewed with Ellena TALBOT and Catherine KARLSON on 10/02/25 and considered five elements

- (1) Risk description.
- (2) Causes of the risk.
- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

The risk is being considered through the lenses of (a) Management (b) Governance (c) Legal (d) Ethics.

(1) Description

The Corporate Risk should be reframed to "Information Governance - The Constabulary fails data and/or information management inspections or is subject to a data breach" to reflect the outcome as opposed to not adhering to local processes.

(2) Cause of the risk

Insufficient local processes and frameworks, insufficient understanding and adherence to policies and frameworks, insufficient technical "design" to mitigate risks.

(3) Controls / Mitigations completed

- Approval of the Constabulary Information Governance approach for management of UK GDPR and DPIA 2018 moving us to a state of mature compliance.
- Adopted the Operational Security Assessment for Policing.
- Adopted the Constabulary Information Governance Framework.
- Integration of the Information Governance Team as part of the Constabulary Ethics Committee.
- Implementation of sound governance processes for oversight of Data risks (e.g. Joint Audit Committee, Confidence & Legitimacy Committee - Information, Data & Security) plus Legal and Information Technology Directorate Leadership Meetings.
- Formal closure of the Information Governance Framework Project at the September Portfolio Steering Board with a Post Implementation Review scheduled for September 2025 to ensure continuation of benefits delivery.

(4) Controls / Mitigations planned

- The Information Governance Framework provides the overarching structure to mitigate the Information Governance Corporate Risk. Delivery of part of the Framework includes the automation of internal and public facing links in support of Data Protection Impact Assessments, Subject Access Requests and Freedom of Information Requests. The implementation of iCASE and associated internet portal will help achieve this.
- The implementation of the Joint Information Management Plan between the I.T. Directorate and Compliance Services is progressing supported by a monthly meeting between the two departments with an Action Plan in place. This meeting is still scheduled and supports collaborative working and decisions which are communicated to the wider Force. This Action Plan will be in delivery for some time.
- We recognise the concerns flagged by the SWAP Information Assurance Report (GDPR compliance). Work continues in relation to the development and implementation of retention schedules and policies. Here the work is twofold. The policy has been rolled out via a PocketBook communication but implementation links to the Information Management Action Plan. We recognise relatively low levels of adherence to this plan further to a recent audit and the need to understand retention risks at a Directorate level. We recognise the need to drive our ROPA compliance levels and this activity links back to the joint Information Governance and I.T. Directorate Action Plan. We continue to adopt a risk based approach looking at record retention by system working towards a locally agreed timescale of August 2026 to progress our approach to records management pragmatically (noting we won't achieve full compliance by this time). There is additional scrutiny here from the Confidence and Legitimacy Committee - Information, Data and Security.
- We recognise the requirement to ensure we check that Directorates are compliant. We will develop a process for checking that effective record weeding is taking place - the Information Asset Owner has a lead role here. We will need to develop an auditable approach to ensure our policies are being followed and consider the most appropriate method to ensure retention rules are being adhered to.
- The development of ROPA and the identification of Information Asset Owners remains in progress. A Guidance Manual has been rolled out to Information Asset Owners, and we are moving the technological solution from Meta-Compliance to SharePoint.
- We continue to work with South West Police Procurement at a regional level to discuss non-functional requirements to assure compliance standards that includes information security for suppliers are assessed. We are now linked in with local procurement to introduce a more streamlined process around requests for service received below the current £50K threshold (although this is indicated to be reduced) where Information Governance requirements may not have been considered. Training will be developed by the Information Governance Team. This approach is to be mirrored across the South West procurement area.
- Work continues to progress well in relation to the Constabulary Data Strategy with 28 activities owned by the Information Governance lead (Head of Compliance and Data Protection Officer). Of these 28, 14 are completed with 7 in progress and 7 still to be started. We are looking to move the Information Governance Hub to the intranet via a SharePoint platform - first meetings are scheduled for February to understand the steps to do so.
- We have adopted an Information Governance Framework Accountability Tracker to understand our levels of compliance. The key metric is the % of Information Governance themes fully meeting requirements. The rating was 72% as of 10/02/25.

(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and assessed as 4/5.
- **Likelihood** - The likelihood score of 3 remains unchanged for Q4. In order to measure mitigated risk scores with an objective metric, we have now aligned this risk to the Information Governance Accountability Tracker and % of Information Governance Framework themes fully meeting requirements. The scale to be applied for likelihood scores is as follows - 90% =1, 80% =2, 70% =3, 60% =4 and 50% =5.

Earlier assessments

Mitigated risk score Q1 2024/25
Mitigated risk score Q2 2024/25
Mitigated risk score Q3 2024/25
Mitigated risk score Q4 2024/25

12
12
12
12



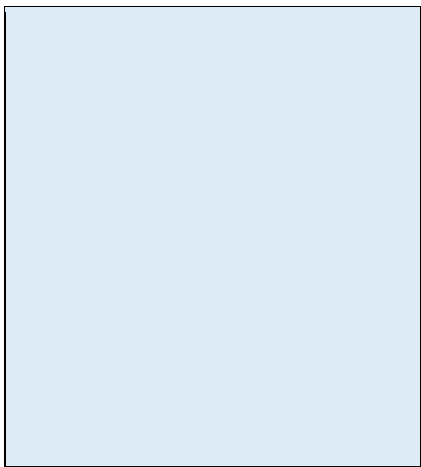
Date of register 03/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR000740	Current Mitigated Score	9
Corporate Risk Title	Governance - Business decisions are made outside of due process and without audit trail	Mitigated Impact Score	3
Corporate Risk Owner(s)	Will White, James Davis	Mitigated Likelihood Score	3
Corporate Risk Description	<p>Within a professional environment as large and complex as Policing, effective and well-understood governance arrangements are critical to keeping us on track. A robust governance framework will help us ensure we are fulfilling our mission to Serve, Protect and Respect Avon & Somerset's communities. Furthermore, it will enable the delivery of our vision for outstanding policing. The starting point for good governance is having absolute clarity on the rules within which we choose to, and indeed must, operate to ensure consistent, transparent, evidence-based and ethical decision making.</p>		
		Date of Risk Review	31/05/2025

Corporate Risk initial assessment - unmitigated risk

Unmitigated Assessment	12
Unmitigated Impact Score	4
Unmitigated Likelihood Score	3
Rationale	<p>The Constabulary adheres to the Chartered Institute for Public Finance Accountants (CIPFA): Delivering Good Governance in Local Government (2016) framework, which sets the standard for local authority governance in the UK. Furthermore, the publication of the International Framework: Good Governance in the Public Sector (CIPFA/IFAC**, 2014), contains seven principles for good governance applicable to local government, which the constabulary has adopted and built its own governance framework around. The principal statutory framework within which Constabulary operates, includes the following:</p> <ul style="list-style-type: none"> • Police Reform and Social Responsibility Act 2011 • Policing Protocol Order 2011 • Financial Management Code of Practice (Home Office, 2013) • Strategic Policing Requirement (Home Office, 2015)



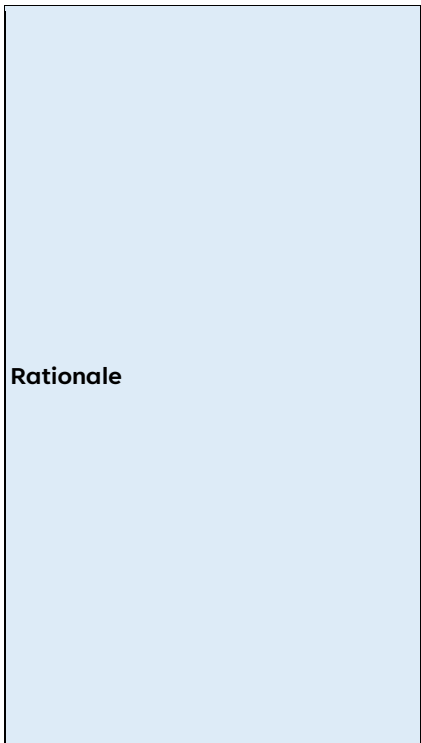
Without a framework in place to adhere and comply with the requirements outlined in these frameworks, we would be vulnerable to scrutiny from several sources and exposed to reputation damages undermining confidence in policing. Locally we have a joint scheme of governance in place between the Police and Crime Commissioner and the Constabulary, through which we set out how we will conduct business efficiently and effectively in accordance with the statutory framework within which we operate. Earlier in 2023 it was recognised that the capacity at Chief Officer level to oversee planning and performance management has been challenging to manage, with limited capacity to lead the breadth of organisational activity across the Chief Officer portfolio. To address this a third ACC role was introduced in the spring of 2023, to head up our “Strategic Planning & Performance” Portfolio.

Across the South West region there are several collaborative partnerships in which Avon & Somerset is a member. These include operational functions such as the South West Regional Organised Crime Unit (SWROCU), South West Forensics (SWF) and organisational functions such as the South West Police Procurement Service (SWPPS). Each of these have their own governance and oversight arrangements, which ultimately report into a regional strategic board where regional PCC’s and CC’s retain oversight. While these arrangements exist, it is recognise that more could be done to clarify the governance arrangements, particularly to ensure that the provide clarity in the support and enabling of performance and strategic objectives.

Corporate Risk - latest assessment - mitigated risk

Mitigated Assessment
Mitigated Impact Score
Mitigated Likelihood Score

9
3
3



Rationale

Quarter 4 Risk Mitigations update

Risk PR/740 was reviewed with ACC Will WHITE on 03/02/25 and considered five elements

- (1) Risk description.
- (2) Causes of the risk.
- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

(1) Description

The Corporate Risk should be reframed to "Governance - Business decisions are made outside of due process and without audit trail" to reflect the outcome as opposed to not adhering to local processes.

(2) Cause of the risk

Local governance documentation is not defined, reviewed, updated, communicated and applied to ensure understanding. Behaviours are not compliant with defined governance processes.

(3) Controls / Mitigations completed

- New Governance Framework introduced May 2022 further to external Consultancy activity.
- Final refinements to the Governance Framework with new meetings introduced to ensure optimised governance framework.
- Central ownership of Governance Framework by Portfolio Management Office (covering logistics and documentation).
- Annual Governance Statement completed providing transparent overview of delivery of governance arrangements in 2023/24.
- Alignment of the Constabulary Strategic Planning Cycle to the Strategic Planning Meeting (SPM) - mutually beneficial.
- Standardisation of PMO support documentation (Agendas, Meeting Capture, Action Logs) and publication via MS Teams Space.
- Identification of key areas of responsibility for specific meetings (e.g. Financial Reporting, Project Stage Gate Reviews, Risk Escalations).
- Clarity of OPCC Governance & Scrutiny thresholds for referrals.
- Regional governance arrangements in place and reported at CMB (SWROCU, CTPSW, PCC/CC, Regional I.T.)
- 2024/25 review of Governance Framework TORs to ensure agenda planning, reporting cadence and attendees are up to date.
- Governance logistics for 2025/26 being managed by the PMO - Outlook invites to be issued September 2024 up to March 2026.
- PMO Post Implementation Review commenced December 2024.

(4) Controls / Mitigations planned for Q4

- The HMICFRS PEEL 2024 Report recognised the clear Constabulary governance arrangements that are in place. The governance structures are strong, but we recognise the requirement for these structures to support and deliver tangible improvement outcomes and this is reflected in our overall mitigated risk assessment score. Governance must effectively close our outcome gaps and improve performance accountability.
- The Governance Framework Post Implementation Review has commenced with a comprehensive MS Forms survey issued to Senior Leaders. However, the survey was issued in December, a little later than intended, and in order to maximise replies, the deadline extended. The survey has now closed with results due for analysis later in February. The final Post Implementation Review recommendations are now due in March - also slightly delayed.
- The Governance Framework continues to complement and support the Constabulary Strategic Planning Cycle. The consolidated output of this cycle is the Annual Organisational SWOT Analysis (Strengths, Weaknesses, Opportunities, Threats) and this is central to the Strategic Planning Day 1 agenda on 02/04/25.
- A new HMICFRS Recommendations Steering Group has been introduced from January 2025 to maintain their consistent management and progression to closure.
- We have revised / updated Terms of Reference as required to capture the role the governance framework now has to formally manage HMICFRS PEEL Inspection Areas for Improvement and Part 1 ANGIOLINI Recommendations (also via GOLD Groups).

(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and assessed as 3/5.
- **Likelihood** - The likelihood score of 3 remains for now. The HMICFRS PEEL Inspection is welcome but the effectiveness of our governance arrangements to support performance accountability and address outcome gaps remain. The Post Implementation Review will identify a number of areas for improvement that will help refine the framework still further, but these will not be available towards the end of the 2024/25 financial year. There is the potential for the likelihood score to reduce to 2 during 2025/26 but this will require the implementation of Post Implementation Review recommendations but also an improvement in outcomes managed through core governance such as the Constabulary Management Board.

Earlier assessments

Mitigated risk score Q1 2024/25
Mitigated risk score Q2 2024/25
Mitigated risk score Q3 2024/25
Mitigated risk score Q4 2024/25

9
9
9
9



Date of register 12/02/2025

Corporate Risk - overview information

Corporate Risk URN	PR001436	Current Mitigated Score	15
Corporate Risk Title	Confidence - The Constabulary has decreasing public confidence survey results	Mitigated Impact Score	5
Corporate Risk Owner(s)	Jon Reilly	Mitigated Likelihood Score	3
		Date of Risk Review	31/05/2025

Corporate Risk Description

The latest Public Confidence figures will be updated to this Corporate Risk Record in due course.

Public Confidence is delivered against a national narrative from the CASEY Review. The review discussed whether leadership, recruitment, vetting, training, culture, and communications support the standards the public should expect. It made recommendations for how high standards can be routinely met so that levels of public trust and confidence can be restored and maintained. We are clear that the report is potentially one of the most important moments for UK Policing in a generation. The wider coverage of the report described widespread racism, sexism and homophobia throughout the Metropolitan Police systems and culture. The report dealt with much more than discrimination and Baroness CASEY has provide a succinct diagnosis of her report.

1. Services to women and children are not good enough.
2. Policing is at its most threadbare closest to the frontline – closest to the public.
3. There is institutional racism, sexism, and homophobia.
4. The Metropolitan Police needs to clean itself up and must root out the bad.

The report was not written about Avon & Somerset Police but under the same test criteria we need to understand how we would measure up. We reflect that many parts resonate, and we acknowledge elements that are true for us. We are committed to confronting and addressing them. The inclusion of this Corporate Risk reflects the various mitigations we have identified and work outstanding to deliver. Aside from CASEY, the scope of Police delivery remains at the forefront of national debate with the recent focus on the Humberside Right Care Right Person Model and announcement from the Metropolitan Police Service to move back from supporting incidents of mental health later in 2023 with wider interpretations how this is out of kilter with founding PEEL principles of wider community wellbeing. There remains continued media interest in local disciplinary hearings managed by Professional Standards with outcomes published via local media outlets. We recognise how some local cases would have caused concern with the public. We understand that our own culture will directly impact on how the public feels about us. We are also aware of the impact of complaints and the impact on complainants and their levels of confidence.

Corporate Risk initial assessment - **unmitigated risk**

Unmitigated Assessment	20
Unmitigated Impact Score	5
Unmitigated Likelihood Score	4

Rationale

The unmitigated assessment score of 20 is based on the combination of a number of considerations that are interlinked. These include the latest declining public confidence figures, the publication of the CASEY Review and the wider implications for UK policing and the recognition of local misconduct and cultural issues within Avon & Somerset. The aggregation of these creates a high unmitigated risk assessment whereby the continued legitimacy of the Constabulary could be subject to public debate.

Corporate Risk - latest assessment - **mitigated risk**

Mitigated Assessment	15
Mitigated Impact Score	5
Mitigated Likelihood Score	3

Rationale

Quarter 4 Risk Mitigations update

Risk PR/1436 was reviewed with DCC Jon REILLY on 12/02/25 and considered five elements

- (1) Risk description.
- (2) Causes of the risk.
- (3) Controls / Mitigations completed.
- (4) Controls / Mitigations planned.
- (5) Projections for future mitigated risk assessment scores.

(1) Description

The Corporate Risk should be reframed to "Confidence - The Business has decreasing public confidence survey results" reflecting a risk whereby the Constabulary is not able to maintain confidence and legitimacy which affects our ability to Police by consent. **We recognise confidence has three elements: (a) policing competence (b) engagement (c) policing standards.**

(2) Cause of the risk

National policing narrative impacts locally. High profile local failure of police delivery. High profile local conduct / standards issue reported.

(3) Controls / Mitigations completed

- Transparency of Constabulary Service delivery through the publication of the Force Management Statement #6 document in May 2024 covering the 2023/24 Financial Year.
- Story Films documentary broadcast in January / February 2024.
- Existence of a strong Independent Advisory Group Network.
- The implementation of Programme #7 on the Constabulary Portfolio as a delivery mechanism for change further to the formal sign-off of the Programme Brief at the Strategic Planning Meeting in July.
- Implementation of the Deferred Prosecution Model as part of the Out of Court Resolutions Project.
- Continued CPD for Front Line Officers.
- Revised Stop & Search Force Procedure.
- Implementation of changes to misconduct regulations.
- Reporting of Operation HARDY in the local media.
- Implementation of Operation HARMONY through Neighbourhood Teams.
- Delivery of the Cultural Behaviour Insights Discovery Project.
- Publication in the summer of "Race Matters - Action After Words" - a report one year on since Avon & Somerset's institutional racism declaration. The Constabulary Anti-Racism Strategy, created in partnership with our communities and now guiding our Race Matters Work, sets out how we will become an anti-racist police service aligned to our wider organisational values. The strategy is framed around a four pillar structure (1) Represented (2) Not over Policed (3) Involved (4) Not Under Protected.
- Implementation of the new Sexual Misconduct Advocate service supporting anyone in the organisation who experiences inappropriate sexual behaviour in the workplace.
- Local public sentiment towards the Police was very strong, particularly from minority communities, asylum seekers and those who represent them, following the national disorder. The proactive work of our neighbourhood policing teams across the Force to reassure and support those communities most in fear was excellent and the feedback received from partners and the community was very complementary. Similarly, the fair yet robust response to protect received similar levels of praise. Officers worked extended shifts to keep communities safe and this was well received driving up public trust and confidence.

(4) Controls / Mitigations planned

- This Corporate risk references Policing Competence, Engagement and Policing Standards.
- For Policing Competence, our plans to mitigate the Service Risks are identified and referenced as part of record PR/736. These explain our approach and focus on both public outcomes and the requirement to address formal outcomes from HMICFRS. Improved service delivery will demonstrate the competence and development of the Avon & Somerset policing service and therefore underpin public confidence.
- For Engagement, we now have a new lead within Neighbourhood Policing working closely with colleagues in Corporate Communications on an Engagement Strategy developing local Action Plans to support its delivery. Work continues through Programme #7 on our Constabulary Portfolio of Change to identify and close engagement gaps. We have introduced a new internal network called "30 Under 30" to understand how to close the engagement gap with younger generations.
- For Policing Standards, we continue to focus on the completion of Code of Ethics Upstander Training and have high completion rates for the e-learning module. We are now building on this to develop in-person Upstander content for Police Staff roles. We are subject to an HMICFRS Integrity Inspection in February and will action any recommendations identified by the Inspectorate as part of their formal feedback. We understand the requirement to manage an effective organisational learning process and continue to map sources of learning for capture by the central Portfolio Management Office (PMO) and subsequent communications. We have introduced formal feeds from Legal Services and Professional Standards into our Organisational Learning process with the next area of attention being operational points of learning from GOLD Groups.



(5) Risk assessment score projections

- **Impact** - The impact of this risk will remain relatively static and assessed as 5/5.
- **Likelihood** - The likelihood score of 3 remains for now. The assessment of this score is based on the delivery of the controls listed about plus a baseline relating to confidence data and national positions. Our "mid-range" result for public confidence drives our likelihood score and therefore a Q4 assessment score of 3 feels appropriate. The latest confidence rate for Avon & Somerset (June 2024) is 66.7% - a small increase from the figure for March 2024 (65.8%), but still 21st position nationally.

Earlier assessments

Mitigated risk score Q1 2024/25
Mitigated risk score Q2 2024/25
Mitigated risk score Q3 2024/25
Mitigated risk score Q4 2024/25

15
15
15
15



Avon & Somerset Constabulary

SWAP Internal Audit

Progress Review

March 2025



ASC SWAP INTERNAL AGREED MANAGEMENT ACTIONS PROGRESS REVIEW – March 2025**INTRODUCTION:**

This report is from the Inspection and Audit Team and provides an update on the following points:

- Overall number of open actions
- Number outstanding and overdue for action
- Total awaiting review for closure by CFO Nick Adams
- Total approved for closure by CFO Nick Adams

OVERVIEW:

Internal audit agreed management actions are tracked and closed once the internal auditors (for audits graded Limited or below) or CFO Nick Adams (for audits graded Reasonable or above) agree the action is complete. Governance is provided via the Joint Audit Committee. SWAP undertake follow up audits throughout the year to review progress. The Inspection and Audit Team (I&AT) meet with SWAP every month to review progress.

The Auditors review all actions where the overall audit opinion is limited or below, however, this is only performed through the follow-up report once the last original date for completion has been reached; I&AT track all actions that fall due in the meantime. The I&AT track all actions that result from an audit with an overall opinion of 'reasonable' and above. The business lead confirms when an action is considered closed or where a revised date for completion is required; the auditors are advised where a follow-up is due but has not been completed.

UPDATE ON ALL AGREED MANAGEMENT ACTIONS <i>Please note, a brief update has been provided against open actions from prior to 23/24 that are outstanding and/or overdue and also for all overdue actions.</i>		Action status – Number at each stage as follows				
Audit titles and dates <i>(Nb. audits are removed from list once all actions have been closed)</i>	Business lead	Total In audit	Open – Not yet due	Open – Overdue	Open – Awaiting closure by CFO	Completed
SWAP 2019/20						
IT Cyber Security – Referred for closure November 2024 – Further action/clarification requested by Nick Adams. Awaiting response from BL.	Nick Lilley	3	0	1	0	2
Total		3	0	1	0	2
SWAP 2020-21						
Health & Safety Management of Frontline Officers and Staff <i>x2 Outstanding: 1.2a - Review Risk management records and procedure update – Reviews underway and should be complete by end Feb 25. 1.4a – Is it possible to capture further incident and ill health data more granularly? - Relates to SAP EH&S and new system (Oracle) which has now been delayed until Dec 2025.</i>	Jason Scott	4	1	0	1	2
Total		4	1	0	1	2
SWAP 2021 - 22						
Victim Support Services <i>x1 Outstanding: 1.6 - Ensure that outcomes from the feedback review include a focus on informing improved performance and extending surveys to a wider spectrum of victims. – Update – The survey has been built, there are just a few outstanding queries with IT re DPIA. (awaiting estimated date of completion from BL)</i>	Victoria Caple / Liz Hughes	6	0	1	0	5
Total		6	0	1	0	5
SWAP 2022-23						
Evidential Property Management <i>x3 Outstanding: 3 open actions require various improvements to systems and practices – work on all actions is progressing and an update is due end of Feb 25.</i>	Teresa Leadbetter	6	3	0	0	3
Regional Digital Forensics <i>x2 Outstanding: 1.2a - Ensure that the ability to recognise and record the complexity of cases can be captured on Fortress or elsewhere to help build the picture of true demand on the DFUs. – Summary</i>	Martyn Bradford	12	3	0	0	9

of update from MB June 24: - 'The current digital CMS (Fortress) includes the recording of case complexity, number of exhibits, and suspects etc. However, more detailed information eg amounts of data, are not. SWF have been in the process of tendering for a new digital CMS since 2023. This action requires substantial IT development so timeframe needs significant extension. Procurement process ongoing and hopefully the new system (BlackRainbow) will be in place by June 2026. This is capable of fulfilling the requirements. The functionality can be reported on following implementation in Q3/4 2026/27 to complete this action.' <i>1.5a - Ensure sufficient consideration is given to how the sharing of workloads and capacity could be maximised across the region as part of the internal gatekeeping and demand review or should be further explored in order to realise further benefits of the Collaboration.</i> Update from MB June 24: - Sufficient investment in ICT networking required to achieve this. The intention is to extend the current manager service contract to include "digital pipes" across the region but this is not expected to be implemented until 2025 at the earliest due to technical and budget constraints. Funding agreed in 2023. In Feb. 2024 BL reported that the ICT infrastructure and server storage within DFU's is improving. The technology to effectively workload share across the region remains a distance away. Once the DF infrastructure is fully stabilised then a supplier of an ICT managed service could scope the connectivity options. Also, SWF are engaged with the NPCC DF Board who are progressing the HMIC DF recommendations - but a national cloud-storage solution is also a distance away. Update June 2024 - Work ongoing with BT for connectivity, this is unlikely to happen before Dec. 2027. Due to the amount of work required to implement this action it will take until at least the end of 2027.'						
IT Service Desk - Referred for closure November 2024 – Further action/clarification requested by Nick Adams. Awaiting response from BL.	Nick Lilley	8	0	1	0	7
Reasonable Adjustments x2 Outstanding: 1 requires implementation of the new Oracle system, 1 referred for closure	Bethan Atwell	2	1	0	1	0
Key Financial Controls x2 Outstanding: Require implementation of new Oracle system (now due Dec 24)	Claire Hargreaves	5	2	0	0	3
Policy & Procedure Management x4 Outstanding – 1 rec is awaiting implementation of Oracle. 3 OPCC recs expected to be completed soon following delays due to capacity and new PCC.	Kate Watson / James Davis	7	4	0	0	3
Assurance Mapping – Referred to NA for closure sign off 15/8/24, further clarification was required. This has been provided and submitted to NA for closure Feb 25	Claire McFadden	2	0	0	1	1
Total		42	13	1	2	26
SWAP 2023-24						
Estates: Compliance with Statutory Obligations	Hannah Watts	13	2	0	1	10

Cash Handling	Anna Elliott	5	1	0	0	4
Strategic approach to IT - Referred for closure November 2024 – Further evidence/clarification requested by Nick Adams. Awaiting response from BL.	Paul Wigginton	2	0	1	0	1
Victim Support Services	Various	5	2	0	1	2
Total		25	5	1	2	17
SWAP 2024-25						
Personal Development Unit – Tutoring – All referred to NA for closure	Ross Williams	4	0	0	4	0
Information Governance	Catherine Karlson	3	3	0	0	0
Key Financial Controls – Treasury Management	Paul Butler	5	3	0	2	0
Criminal Justice	Sharon Baker	3	3	0	0	0
Business Continuity	Ian Norrie	2	2	0	0	0
Culture within Specialist Teams	Rob Cheeseman	1	1	0	0	0
Total		18	12	0	6	0

	Total actions	Total open – not yet due	Total open - overdue	Total - awaiting closure	Closed
	98	31	4	11	52
		Total of above – all open actions			
		46			



Avon & Somerset Police Audit Progress Report and Sector Update

Year ending 31 March 2025

27 February 2025



Agenda

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Introduction



Your key Grant Thornton team members are:

Julie Masci

Key Audit Partner

T: 029 2034 7506

E: Julie.masci@uk.gt.com

George Amos

Manager

T: 0117 305 7780

E: George.WM.Amos@uk.gt.com

Linnet Tutcher

Assistant Manager

T: 0117 305 7702

E: Linnet.RC.Tutcher@uk.gt.com

This paper provides the Joint Audit Committee with a report on progress in delivering our responsibilities as your external auditors

The paper also includes a summary of emerging national issues and developments that may be relevant to you.

Members of the Joint Audit Committee can find further useful material on our website where we have a section dedicated to our work in the public sector. Here you can download copies of our publications.

If you would like further information on any items in this briefing or would like to register with Grant Thornton to receive regular email updates on issues that are of interest to you, please contact either your Engagement Lead or Engagement Manager.

We continue to bring specialists to our update conversations where appropriate to share any learning from our position as a leading audit supplier to the police sector.

You will also have access to our annual Chief Accountant Workshops and any other networking opportunities we create for the various stakeholders.

Progress at February 2025

Key areas

Financial Statements Audit

Our audit of your financial statements for 2023/24 was completed between June and November 2024, and we issued an unqualified opinion on 5 November 2024.

In March 2025 we will commence our detail audit risk assessment for 2024/25. We will issue a detailed audit plan, setting out our proposed approach to the audit of the 2024/25 financial statements to management before the end of April, and this will be presented to the Joint Audit Committee in the July meeting.

We plan to commence our audit fieldwork in late June 2025, subject to draft financial statements being published. We will discuss with management whether this timescale is realistic, given the statutory deadline for the publishing of draft financial statements is 30 June 2025.

Value for Money

We aim to complete all 2024/25 value for money audit reviews by 31 December 2025.

From current trends around cost pressures and service demand, we anticipate that risks around financial sustainability and reserves will require consideration across most value for money reviews for 2024/25. Arrangements for governance and improving economy, efficiency and effectiveness will also be reviewed. The current estimated financial trajectory of the sector is shown within the sector update in this report.

Where there are lessons to be learnt from the findings for our 2023/24 value for money reviews, we will seek to share them on a timely basis, to inform future practice.

Progress at March 2025

Other areas

Meetings

We presented our Final Audit Findings Report for the 2023/24 financial statements to the Joint Audit Committee in December 2024. The planning stage for our 2024/25 financial statements audit is to commence from the beginning of March 2025 and we will be in discussion with Finance Officers during this time. We last met with the Chief Finance Officers in December ahead of the JAC meeting.

Events

We provide a range of workshops, along with network events for members and publications to support the Police and Crime Commissioner and Chief Constable. Your officers have been invited to attend our Accounts Workshop in March 2025, where we will highlight financial reporting requirements for the 2024/25 accounts and give insight into elements of the audit approach.

Further details of the publications that may be of interest to the Police and Crime Commissioner, Chief Constable and JAC members are set out in our Sector Update section of this report.

Audit Fees

PSAA have published their scale fees for 2024/25: [2024/25 auditor appointments and audit fee scale – PSAA](#).

For the Police and Crime Commissioner and Chief Constable's of Avon & Somerset these fees are £118,727 for the Police and Crime Commissioner and £63,398 for the Chief Constable. These fees are derived from the procurement exercise carried out by PSAA in 2022. They reflect both the increased work auditors must now undertake as well as the scarcity of audit firms willing to do this work.

2023/24 deliverables

2023/24 Deliverables	Status
<p>Accounts Joint Audit Plan</p> <p>We are required to issue a detailed accounts joint audit plan to the Joint Audit Committee setting out our proposed approach in order to give our opinions on the 2023/24 financial statements.</p>	Delivered
<p>Joint Audit Findings (ISA260) Report</p> <p>The Interim Joint Audit Findings Report was reported to the September Joint Audit Committee and the Final version of this report was taken to the December meeting.</p>	Delivered
<p>Auditors Reports</p> <p>These are the opinions on your financial statements and annual governance statements.</p>	Delivered
<p>Auditor's Annual Report</p> <p>The key output from local audit work on arrangements to secure VFM is an annual commentary on arrangements, which will be published as part of the Auditor's Annual Report (AAR). A draft of the AAR was taken to the September Joint Audit Committee and the final version was presented at the December meeting.</p>	Delivered

2024/25 deliverables

2024/25 Deliverables	Planned Date	Status
<p>Accounts Joint Audit Plan</p> <p>We are required to issue a detailed accounts joint audit plan to the Joint Audit Committee setting out our proposed approach in order to give our opinions on the 2023/24 financial statements.</p>	<p>April 2025 to management July 2025 to JAC</p>	<p>Not due yet</p>
<p>Joint Audit Findings (ISA260) Report</p> <p>The Joint Audit Findings Report is planned to be reported to the September Joint Audit Committee.</p>	<p>September 2025</p>	<p>Not due yet</p>
<p>Auditors Reports</p> <p>These are the opinions on your financial statements and annual governance statements.</p>	<p>September 2025</p>	<p>Not due yet</p>
<p>Auditor's Annual Report</p> <p>The key output from local audit work on arrangements to secure VFM is an annual commentary on arrangements, which will be published as part of the Auditor's Annual Report (AAR). A draft of the AAR will be taken to the September Joint Audit Committee.</p>	<p>September 2025</p>	<p>Not due yet</p>

Policing Sector Update

Policing services are rapidly changing. Increased demand from the public and more complex crimes require a continuing drive to achieve greater efficiency in the delivery of police services. Public expectations of the service continue to rise in the wake of recent high-profile incidents, and there is an increased drive for greater collaboration between Forces and wider blue-light services.

Our sector update provides you with an up-to-date summary of emerging national issues and developments to support you. We cover areas which may have an impact on your organisation, the wider Police service and the public sector as a whole. Links are provided to the detailed report/briefing to allow you to delve further and find out more.

Our public sector team at Grant Thornton also undertake research on service and technical issues. We will bring you the latest research publications in this update. We also include areas of potential interest to start conversations within the organisation and with audit committee members, as well as any accounting and regulatory updates.

More information can be found on our dedicated public sector and police sections on the Grant Thornton website by clicking on the logo below:



Grant Thornton Publications
Insights from sector specialists
Accounting and regulatory updates



Home Office

Home Office January 2025

Police Funding Settlement 2025-26

Within the Police Funding Settlement, overall funding for policing will total up to £19.6 billion in 2025-26, an increase of up to £1.1 billion when compared to the 2024-25 settlement.

Of this amount, funding available to Police and Crime Commissioners (PCCs) for their local police force will be up to £17.5 billion an increase of up to an additional £1.1 billion in 2025-26, a 6.6% cash increase and 4.1% real terms increase.

This includes an additional £100 million for Neighbourhood Policing above that announced at the provisional police funding settlement. This assumes PCCs make use of the full precept flexibility of £14 for English forces.

The full statement can be found [here](#).

HMICFRS January 2025

2024/25 Value for Money profiles



HMICFRS' value for money dashboards provide comparative data on a wide range of policing activities from 2011 up to the most recent data release (January 2025).

They allow detailed analysis of:

- how much forces spend on different policing activities;
- how crime levels compare across forces, as well as what outcomes forces achieve; and
- workforce costs, broken down by role, rank and gender.

The dashboard can be found [here](#).



Home Office

Home Office November 2024

Home Secretary announces major policing reforms

In her first major speech at the annual conference hosted by the National Police Chiefs' Council and Association of Police and Crime Commissioners, the Home Secretary set out her plans to deliver major policing reforms, including:

- a new Police Performance Unit to track national data on local performance and drive up standards
- a Neighbourhood Policing Guarantee to get policing back to basics and rebuild trust between local forces and the communities they serve
- a new National Centre of Policing to harness new technology and forensics, making sure policing is better equipped to meet the changing nature of crime

The Home Secretary also announced more than half a billion pounds of additional central government funding for policing next year to support the government's Safer Streets Mission, including an increase in the core grant for police forces, and extra resources for neighbourhood policing, the NCA and counter-terrorism. A full breakdown of the funding will be published as part of the police settlement in December.

The full article can be found [here](#).

Accounting Update – IFRS 16

A briefing for audit committees on the implementation of IFRS16

IFRS 16 - Leases

Lessee accounting up to 31 March 2024

Until April 2024, when the police body gained the use of an asset under a lease agreement, it had to determine whether it was a finance lease or an operating lease. The distinction was based on which entity had substantially all the risks and rewards of ownership. It was important because finance leased assets were deemed capital and accounted for on the authority's balance sheet, whereas operating lease costs were charged to expenditure over the life of the lease.

Lessee accounting from 1 April 2024

From the adoption of IFRS 16 leases on 1 April 2024, the distinction between operating and finance leases for lessees has been removed. Now all leases, apart from those that are deemed low value or short term, are accounted for on balance sheet by lessees.

Asset and liability recognised

Under IFRS 16, lessees recognise their right to use an asset and also a liability for the present value of the total amount they expect to pay over the period of the agreement. Initially, the right of use asset and the liability are usually recognised at the same value, unless there have been any relevant payments before the start of the lease.

After initial recognition, the right of use asset is valued the same way as owned assets of a similar type and the liability is increased for interest due or changes in expected payments due to the application of a rate or index such as RPI, and decreased for amounts paid.

Public sector adaptation

In the public sector, the definition of a lease has been extended to include the use of assets for which little or no consideration is paid, often called "peppercorn" rentals. This is one instance where the right of use asset and associated liability are not initially recognised at the same value. For peppercorn rentals, the right of use assets are initially recognised at market value and any difference between that and the present value of expected payments is accounted for as income, similar to the treatment of donated assets.

IFRS 16 - Leases

Judgements required

Most of the information needed to determine the appropriate figures for the accounts will come from the lease agreement. However, sometimes judgements may need to be made by management. Such judgements may include:

- determining what is deemed to be a low value lease. This is based on the value of the underlying asset when new and is likely to be the same as the authority's threshold for capitalising owned assets.
- determining whether an option to terminate or extend the lease will be exercised. This is important as it affects the lease term and subsequently the calculation of the lease liability based on the expected payments over the lease term
- the valuation of the right of use asset after recognition. An expert valuer may be required to support management in this.

Lessor accounting

IFRS 16 has preserved the distinction between finance and operating lease accounting for lessors. The key things that lessors need to be aware of are:

- assets leased out for a peppercorn rental should be treated as finance leases if they have, in substance, been donated to the operator
- if the asset is sub-let, the consideration of whether the sub-lease is a finance lease or an operating lease takes account of the value and duration of the head lease rather than the value and life of the underlying asset

IFRS 16 - Leases

Questions to consider

Questions for policing bodies to ask themselves include:

- How have you gained assurance on completeness, that you have identified all your leases including those for a peppercorn rent?
- Have you set your threshold for low value leases?
- How have you identified all options to terminate or extend existing leases and assessed the lease term on the basis of the likelihood you will exercise them?
- Have you reconciled your operating lease commitments as disclosed in your 31 March 2023 accounts under IAS 17 to your lease liability under IFRS 16 on 1 April 2024?
- How have you gained assurance that right of use assets are carried at the appropriate value at the balance sheet date?
- If you are an intermediate lessor, have you reassessed whether the leases out are finance or operating leases with reference to the terms of the head lease?
- Have you updated your systems to ensure that the budgetary and accounting impact of all leases is identified in a timely and effective manner.



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Avon & Somerset Constabulary and Office of the Police and Crime Commissioner Joint Audit Committee (JAC)

Report of Internal Audit Activity – March 2025

Internal Audit ■ Risk ■ Special Investigations ■ Consultancy

Executive Summary

SWAP is required to provide an annual opinion to support the Annual Governance Statement.

As part of our plan progress reports, we will look to provide an ongoing opinion to support the end of year annual opinion.

We will also provide details of any significant risks that we have identified in our work. A reminder of our assurance opinions and risk assessment is on our [website](#).

The Chief Executive for SWAP reports company performance on a regular basis to the SWAP Directors and Owners Boards.

Audit Opinion & Significant Risks

We are able to provide a reasonable rolling assurance opinion, based on work completed in 2024/25 to date. We have identified no significant risks via our work this year.

Audit Plan Progress

Since the last committee in December 2024, the following audits have been completed:

- Culture within Specialist Teams
- Business Continuity

These audit reports are submitted with this update. Further detail is provided on the status of each audit in **Appendix A** and performance against the annual budget is summarised in the table below:

Performance Measure	2024/25 Performance
<u>Delivery of Annual Audit Plan</u>	
Completed	41%
Reporting	2%
In Progress	43%
Scoping	3%
Ongoing Support (Planning, reporting & Advice)	11%

The remaining six audits from the 2024/25 Internal Audit Plan are now all in progress. The **Regional Vetting** review is currently at scoping stage, however, we are awaiting confirmation from CFOs whether we should proceed in light of an internal review already undertaken.

The fieldwork for the 2023/24 deferred **Regional Recruitment & Retention** is now also complete and a report is being prepared.

Internal Audit Plan Progress 2024/25

Appendix A

Audit Area	Period	Estimated Cost	Status	Opinion	No of Recs	1 = Major	↔		3 = Minor
						Recommendations			
						1	2	3	
2023/24									
Information Governance	Q4	£4,635.00	Completed	Reasonable	3	-	2	1	
2024/25									
ERP Programme Management	Q1	£5,970.00	Completed	Reasonable	0	0	0	0	
Estates – Compliance with Statutory Obligations Follow Up	Q1	£3,184.00	Completed	Advisory	N/A	-	-	-	
Corporate Credit Cards	Q1	£3,184.00	Completed	Limited	1	0	1	0	
Criminal Justice	Q2	£3,862.50	Completed	Limited	3	0	0	3	
Treasury Management	Q2	£4,776.00	Completed	Reasonable	5	0	2	3	
Culture within Specialist Teams	Q2	£5,970.00	Completed	Reasonable	1	0	1	0	
Business Continuity	Q3	£4,776.00	Completed	Reasonable	2	0	1	1	
Regional – Recruitment and Retention Benchmarking Review	Q1	£3,862.50	Reporting	Agreed with S151 Officer to defer audit to 2024/25.					
ICT User Access Management	Q2	£4,776.00	In Progress	-	-	-	-	-	
OPCC Statutory Functions	Q3	£4,776.00	In Progress	-	-	-	-	-	
Ammunition and Armoury Management	Q3	£5,970.00	In Progress	-	-	-	-	-	
Regional – Vetting	Q3	£1,990.00	Scoping	-	-	-	-	-	
Property Stores and Records Management	Q4	£5,970.00	In Progress	-	-	-	-	-	



SWAP work is completed to comply with the mandatory elements of the IIA’s International Professional Practices Framework, further guided by interpretation provided by the UK Public Sector Application Note and the CIPFA Code of Practice for the Governance of Internal Audit in UK Local Government.

Audit Area	Period	Estimated Cost	Status	Opinion	No of Recs	1 = Major	↔	3 = Minor
						Recommendations		
						1	2	3
Interpreters – Value for Money	Q4	£3,862.50	In Progress	-	-	-	-	-
Network Boundary Defences	Q4	£4,776.00	In Progress	-	-	-	-	-
Regional – Telematics	Q4	£1,990.00	In Progress	-	-	-	-	-
Planning, Reporting & Advice	Q1-4	£7,960.00	Ongoing	N/A	-	-	-	-



Avon & Somerset Constabulary and Office of the Police and Crime Commissioner Joint Audit Committee (JAC)

Proposed 2025-26 Internal Audit Plan Q1-2
and Internal Audit Charter

The Internal Audit Plan: Summary

The internal audit plan represents a summary of the proposed audit coverage that the internal audit team will deliver in the first six months of the 2025/26 financial year.

Delivery of an internal audit programme of work that provides sufficient and appropriate coverage, will enable us to provide a well-informed and comprehensive year-end annual internal audit opinion.



Introduction and Objective of the Internal Audit Plan

Internal audit provides an independent and objective opinion on the Force and OPCC's risk management, governance, and control environment, by evaluating its effectiveness.

The outcomes of each of the audits in our planned programme of work, will provide senior management and Members with assurance that the current risks faced by the Force and OPCC in these areas are adequately controlled and managed.

It should be noted that internal audit is only one source of assurance, and the outcomes of internal audit reviews should be considered alongside other sources, as part of the 'three lines' assurance model. Key findings from our internal audit work should also be considered in conjunction with completion of the Annual Governance Statement for the Force and OPCC.

It is the responsibility of the Force and OPCC Leadership Teams, and the Joint Audit Committee (JAC), to determine that the audit coverage contained within the proposed audit plan is sufficient and appropriate in providing independent assurance against the key risks faced by the organisation.

When reviewing the proposed internal audit plan (as set out in Appendix 1), key questions to consider include:

- Are the areas selected for coverage this coming period appropriate?
- Does the internal audit plan cover the organisation's key risks as they are recognised by the Leadership Teams and Audit Committee?
- Is sufficient assurance being received within our annual plan to monitor the organisation's risk profile effectively?

Internal audit coverage can never be absolute and responsibility for risk management, governance and internal control arrangements will always remain fully with management. As such, internal audit cannot provide complete assurance over any area, and equally cannot provide any guarantee against material errors, loss or fraud.

The Internal Audit Plan: Approach

The work of internal audit should align strategically with the aims and objectives of the organisation, taking into account key risks, operations and changes.

In order to do this Internal Audit needs to be flexible in adapting audit plans to handle rapidly changing risks, priorities and challenges.



Approach to Internal Audit Planning 2025/26

Our approach to internal audit planning throughout 2025/26 will be a continuous risk assessment and rolling plan approach. Rather than present a proposed annual plan at the start of the year, which is subject to a high level of uncertainty and change, we will build our plan in conjunction with management as the year progresses, presenting a six-month rolling plan with a pipeline list of potential areas for consideration for future audit plans. This is then reviewed each quarter to ensure that the six-month rolling plan is relevant. This rolling planning process will provide the same assurances as an annual plan but will better reflect the changing risk landscape.

Quarterly audit planning meetings will be held with the Chief Officer – Finance, Resources and Innovation and the OPCC's Chief Finance Officer (S.151 Officers) prior to presenting a proposed plan to this Committee for formal approval. In addition, we will also aim to meet regularly with the Deputy Chief Constable and the Chief of Staff to ensure the plan remains relevant.

These meetings will lead to a 12 month 'rolling wave plan' place-marking key areas of coverage to support the annual opinion. This is then underpinned by quarterly risk-based work plans which draw from meetings with management and the 'rolling plan' throughout the financial year to ensure we are auditing the right areas, with the correct scope, at the right time and reported through our quarterly progress updates.

The resulting programme will be a combination of requested audit work aligned to service priorities, combined with audit work recommended by SWAP driven by our continuous risk assessment. This risk assessment will be based on the live status of both the Force's and OPCC's strategic risk registers. Overlaid onto this assessment will be the Police and Crime Plan, the Force Management Statement (FMS) and SWAP's sector-wide top 10 risk areas. The results of our risk assessments will be shared with senior management to obtain their view on the value of internal audit involvement. In developing risk assessments, we will also take account of other sources of assurance, where relevant.

The Internal Audit Plan: Approach

To develop an appropriate risk-based audit plan, SWAP have consulted with senior management, as well as reviewing key documentation, in order to obtain an understanding of the organisation’s strategies, key business objectives, associated risks, and risk management processes.

Approach to Internal Audit Planning 2025/26

The factors considered in putting together the 2025/26 internal audit plan have been set out below:



Due to the pace of change within the policing sector and now the impact of social economic factors, it is becoming increasingly difficult to accurately predict longer-term key organisational risks. Our approach to internal audit planning therefore reflects this. The risk-assessed work plan contains key areas of coverage, to ensure that we are auditing the right areas at the right time. The precise scope of each audit will be determined at the start of the review, in line with local risk factors at that time.

The Internal Audit Plan: Risk Assessment

A documented risk assessment prior to developing an internal audit plan, ensures that sufficient and appropriate areas are identified for consideration.



Internal Audit Annual Risk Assessment

Our 2025/26 internal audit programme of work is based on a documented risk assessment, which SWAP will revisit regularly, but at least annually. The input of senior management as well as a review of the organisations' risk register will be considered in this process.

Below we have set out a summary of the outcomes of the risk assessment for Avon and Somerset Police and OPCC:

As above, it is the responsibility of the leadership teams for the Force and OPCC and the JAC to ensure that, following our risk assessment, the proposed plan contains sufficient and appropriate coverage.



The Internal Audit Plan: Coverage

Following our SWAP Risk Assessment above, we have set out how the proposed plan presented in Appendix 1 provides coverage of the key components set out in the Force Management Statement (FMS), against which we have aligned our audit universe, as well as the areas within the Police and Crime Plan.

Internal audit is only one source of assurance; therefore, where we have highlighted gaps in our coverage, assurance should be sought from other sources where possible, such as HMICFRS, in order to ensure sufficient and appropriate assurances are received.

The 2025/26 Internal Audit Plan does not afford coverage to the areas highlighted as red. Assurance should either be sought from alternative sources or considered for inclusion in future Internal Audit Plans.

Previous Internal Audit Plan coverage against the FMS areas can be seen in Appendix 2.



Internal Audit Coverage in 2025/26

Following our SWAP risk assessment, we have set out below the extent to which the proposed Q1-2 plan presented in Appendix 1, provides coverage of Avon and Somerset Police's key corporate objectives and risks, as well as our core areas of recommended audit coverage:



Internal audit coverage can never be absolute and responsibility for risk management, governance and internal control arrangements will always remain fully with management. As such, internal audit cannot provide complete assurance over any area, and equally cannot provide any guarantee against material errors, loss or fraud.

The Internal Audit Plan: SWAP

SWAP Internal Audit Services is a public sector, not-for-profit partnership, owned by the public sector partners that it serves. The SWAP Partnership now includes 25 public sector partners, crossing nine Counties, but also providing services throughout the UK.

As a company, SWAP has adopted the following values, which we ask our clients to assess us against following every piece of work that we do:

- Candid
- Relevant
- Inclusive
- Innovative
- Dedicated



Your Internal Audit Service

Audit Resources

The 2025/26 internal audit programme of work will be equivalent to £74,000. The current internal audit resources available represent a sufficient and appropriate mix of seniority and skill to be effectively deployed to deliver the planned work. The key contacts in respect of your internal audit service for Avon and Somerset Police and OPCC are:

Charlotte Wilson, Assistant Director – charlotte.wilson@swapaudit.co.uk, 020 8142 5030

Juber Rahman, Principal Auditor – juber.rahman@swapaudit.co.uk, 020 8142 5030

External Quality Assurance

SWAP work is completed to comply with the International Professional Practices Framework of the Institute of Internal Auditors (IPPF).

Every five years, SWAP is subject to an External Quality Assessment of Internal Audit Activity. The last of these was carried out in January 2025 which confirmed general conformance with the IPPF.

Conflicts of Interest

We are not aware of any conflicts of interest within Avon and Somerset Constabulary and OPCC that would present an impairment to our independence or objectivity. Furthermore, we are satisfied that we will conform with our IIA Code of Ethics in relation to Integrity, Objectivity, Confidentiality, & Competency.

Consultancy Engagements

As part of our internal audit service, we may accept proposed consultancy engagements, based on the engagement's potential to improve management of risk, add value and improve the organisation's operations. Consultancy work that is accepted, will contribute to our annual opinion and will be included in our plan of work.

The Internal Audit Plan: SWAP

Over and above our internal audit service delivery, SWAP will look to add value throughout the year wherever possible. This will include:

- **Benchmarking and sharing of best-practice between our public-sector Partners**
- **Regular newsletters and bulletins containing emerging issues and significant risks identified across the SWAP partnership**
- **Communication of fraud alerts received both regionally and nationally**
- **Annual Member training sessions**

Approach to Fraud

Internal audit may assess the adequacy of the arrangements to prevent and detect irregularities, fraud and corruption. We have dedicated counter-fraud resources (contact details below) available to undertake specific investigations if required. However, the primary responsibility for preventing and detecting corruption, fraud and irregularities rests with management who should institute adequate systems of internal control, including clear objectives, segregation of duties and proper authorisation procedures.

SWAP Confidential Reporting Line – 020 8142 8462, confidential@swapaudit.co.uk

Our Reporting

A summary of internal audit activity will be reported quarterly to senior management and the Audit Committee. This reporting will include any significant risk and control issues (including fraud risks), governance issues and other matters that require the attention of senior management and/or the Audit Committee. We will also report any response from management to a risk we have highlighted that, in our view, may be unacceptable to the organisation.

It should be noted that the audit titles and high-level scopes included below are only indicative at this stage for planning our resources. At the start of each audit, an initial discussion will be held to agree the specific terms of reference for the piece of work, which includes the objective and scope for the review.

Audit Title	Area of Coverage	Estimated Cost	Proposed Quarter
<p>Hybrid Working</p>	<p>Following the COVID-19 pandemic, a significant proportion of Avon and Somerset Police staff (c.1600) moved to a hybrid model of home and office working. This has also been extended to officers.</p> <p>This audit would aim to assess the governance, operational efficiency, compliance, data security and overall effectiveness of the hybrid working model for both police staff and officers.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Corporate Risk Register: Risk PR737 / PR738 – People / Infrastructure Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 11 – Force-wide Functions</p>	<p>£6,150.00</p>	<p>Q1</p>
<p>Corporate Credit Cards – Follow Up</p>	<p>A follow up review to provide assurance that actions to mitigate against the risks identified in this recent limited assurance audit have been implemented.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Corporate Risk Register: Risk PR735 – Finance Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 1 – Finance</p>	<p>£615.00</p>	<p>Q1</p>
<p>ICT Disaster Recovery</p>	<p>To ensure that the Force has identified the IT systems and data critical to the delivery of its services and made sufficient provision to recover those systems and data from a partial or total loss of computing and business services in a timely and organised manner. Digital disruption features in the IIA’s top 10 risks and this area also received Limited Assurance at another Partner site.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Corporate Risk Register: Risk PR739 – Data Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 10 – Knowledge Management and ICT</p>	<p>£4,920.00</p>	<p>Q1</p>

Audit Title	Area of Coverage	Estimated Cost	Proposed Quarter
Benefits Realisation	<p>This area was originally suggested by the Joint Audit Committee for inclusion on the internal audit pipeline.</p> <p>The audit would look to review how the Force captures and reports benefits of both large projects and smaller exercises. We will assess whether benefits are clearly defined, measured, and reported across the Force, ensuring benefits realisation is embedded in decision making.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Corporate Risk Register: Risk PR735 – Finance Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 1 / 11 – Finance / Force-wide Functions</p>	£6,150.00	Q2
ICT Procurement and Contract Management	<p>Procurement and contract management are critical to achieving an organisation’s strategic goals. They ensure that the right goods, services, and works are sourced and delivered on time and within budget while mitigating risks, ensuring compliance, and optimising supplier relationships. This audit aims to review how ICT procurement and contracts are being managed and monitored across the Force.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Corporate Risk Register: Risk PR735 – Finance Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 1 / 10 – Finance / Knowledge Management and ICT</p>	£6,150.00	Q2
Criminal Justice – Follow Up	<p>A follow up review to provide assurance that actions to mitigate against the risks identified in this recent limited assurance audit have been implemented.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 5 – Investigations</p>	£1,025.00	Q2
KFC – Overtime and Shift Allowances	<p>This audit review will look to provide assurance regarding the Forces accurate application of overtime and shift allowance regulations and provisions following a limited assurance review at another Partner site.</p> <p><u>Links to Core Areas of Recommended Coverage:</u> Corporate Risk Register: Risk PR735 – Finance Police and Crime Plan: Priority 5 – Improve standards of policing Force Management Statement: Section 1 / 11 – Finance / Force-wide Functions</p>	£4,920.00	Q1
TOTAL estimated cost of delivery of above proposed Audits		£29,930.00	

Support Activities and Follow Up Work – 2025-26 Annual Allocation			
Contribution to Regional Work	As agreed across all South West Police Forces, an allocation has been allotted to take forward audits of common interest, enabling benchmarking of approach and position across the region as a whole. The areas to be reviewed will be agreed by the Directors of Finance from each of the South West Police Forces.	£4,100.00	Throughout Year
Follow up of Limited Assurance Reviews	Allocation of time to allow for follow up of agreed actions not subject to separate consideration.	£2,050.00	Throughout Year
Planning, Reporting & Advice	Agreed attendance at quarterly audit committees, undertaking audit planning and any corporate advice.	£8,200.00	Throughout Year
TOTAL estimated cost of delivery of support activities and follow up work for 2025/26		£14,350.00	
TOTAL estimated cost of delivery for Q3-4 Audits		£29,520.00	
TOTAL estimated cost of delivery of above proposed Internal Audit Plan for 2025/26 (Inc. costs for Q3-4)		£73,800.00	
TOTAL agreed cost of delivery for the Internal Audit Plan for 2025/26		£73,800.00	
Pipeline Audits - <i>These audits are potential areas for inclusion as part of future Internal Audit Plans</i>			
Audit Title	Type of Work	Priority	Notes
ASP Payroll and Expenses – Pipeline 2025/26	Assurance	Higher priority	<p>This audit aims to provide assurance that key financial controls in relation to the payroll function are operating effectively and areas vulnerable to fraud are sufficiently well controlled post ERP implementation.</p> <p>In addition, we will also seek to provide assurance in relation to Chief Officer and OPCC expenses. Both the Force and OPCC have committed to publishing Chief Officer expenses on their respective websites as part of their transparency in financial reporting. In order to support this, we aim to undertake whole data analysis to provide assurance that Chief Officers’ and OPCC expenses (claims and credit card expenditure for expenses) are made in line with agreed policy, subject to independent scrutiny and transparently published.</p>

Audit Title	Type of Work	Priority	Notes
ASP FMS Assurance Mapping - Pipeline	Advisory	Medium priority	Advisory review to map out where assurance is coming from for all areas of the FMS to provide Management and Members with the extra confidence that the Force is gaining full assurance of areas of the FMS not covered by Internal Audit.
ASP Governance of Use of Force - Pipeline	Assurance	Medium priority	Following an incident in Manchester, in July 2024, whereby an Officer was filmed using excessive force, we are suggesting a review to provide assurance on the effectiveness of the governance arrangements regarding the 'use of force' across the constabulary. This area has not been previously audited by SWAP.
ASP Value for Money Review - Pipeline	Assurance	Medium priority	The checklist from the new Financial Management Code by CIPFA recommends that value for money reviews are included in the Internal Audit Plan.
ASP Forensics Team Accreditation - Pipeline	Assurance	Medium priority	<p>Identified by the Police Audit Group (PAG) as a key risk facing the sector.</p> <p>Force forensics teams are crucial to ensure the quality, reliability, and integrity of forensic evidence used in criminal investigations and legal proceedings. The primary accreditation standard for forensic laboratories in the UK is ISO/IEC 17025, which sets out general requirements for the competence of testing and calibration laboratories.</p> <p>The management of achieving this accreditation should be considered for review.</p>
ASP Management of Recommendations from Inspection Bodies - Pipeline	Assurance	Medium priority	Review to provide assurance that recommendations from other assurance providers are being monitored and implemented appropriately.
ASP Workforce Planning - Pipeline	Assurance	Lower priority	Proposed review of how effectively the Force plans, manages, and optimises it's workforce to achieve its strategic objectives. There is currently a number of workforce planning risks featured on the Force's risk register.

The table below sets out the extent to which previous Internal Audit plans for Avon and Somerset Police provides coverage of the key components set out in the Force Management Statement (FMS).

	2022-2025*		2024/25		2023/24		2022/23	
	Coverage	Average Opinion	Coverage	Average Opinion	Coverage	Average Opinion	Coverage	Average Opinion
Finance	Good	Reasonable	Good	Reasonable	Adequate	Reasonable	Some	Reasonable
Wellbeing	Adequate	Reasonable	Some	Reasonable	Some	Reasonable	Some	Limited
Responding to the Public	Some	Reasonable	None	N/A	Some	Non-Opinion	Some	Reasonable
Prevention & Deterrence	None	N/A	None	N/A	None	N/A	None	N/A
Investigations	Adequate	Limited	None	N/A	Some	Limited	Some	Limited
Protecting the Vulnerable	Some	Reasonable	None	N/A	Some	Reasonable	None	N/A
Managing Offenders	None	N/A	None	N/A	None	N/A	None	N/A
Managing Serious & Organised Crime	Some	Non-Opinion	None	N/A	None	N/A	Some	Non-Opinion
Major Events	None	N/A	None	N/A	None	N/A	None	N/A
Knowledge Management and ICT	Adequate	Reasonable	Some	In Progress	Some	Reasonable	Some	Limited
Force-Wide Functions	Good	Reasonable	Good	Reasonable	Good	Reasonable	Adequate	Reasonable
Collaboration	Some	Reasonable	Some	Reasonable	None	N/A	Some	Non-Opinion
<p><i>*Audits completed over 1 year from Feb 2025 have a reduced impact on audit coverage</i></p>								



Internal Audit Charter for SWAP Internal Audit Services (SWAP)

Background

SWAP Internal Audit Services are the internal auditors for both Avon and Somerset Constabulary (the Force) and the Office of the Police and Crime Commissioner (OPCC) for the area in line with the Home Office Financial Management Code of Practice for the Police Forces of England and Wales.

This Charter defines Internal Audit's purpose, authority, responsibility and scope of activity and sets out SWAP's position within the Force and OPCC. It explains the nature of the SWAP Assistant Director (chief audit executive), as the Head of Internal Audit, reporting relationship with "those charged with governance" i.e. the Police and Crime Commissioner (PCC) and the Chief Constable (CC). The PCC and Chief Constable are required to maintain an effective internal audit of their affairs by the Accounts and Audit (England) Regulations 2015, which states that a relevant body must "undertake an adequate and effective internal audit of its accounting records and of its systems of internal control in accordance with the proper practices in relation to internal controls".

The PCC's Chief Financial Officer (PCC CFO) and the CC's Chief Officer for Finance, Resources and Innovation (CC CFO) have statutory responsibility under Section 151 of the Local Government Act 1972 for ensuring an effective system of internal financial control and proper financial administration of the PCC's and Force's affairs.

The Financial Management Code of Practice for the Police Forces of England and Wales recommends a Joint Internal Audit Service to cover both the OPCC and Force.

This Charter covers engagement with the; Chief Officer Group (COG), OPCC Statutory Roles, and the Joint Audit Committee¹.

Purpose

SWAP Internal Audit Services creates, protects, and sustains value by providing the Joint Audit Committee (JAC) and senior management with independent, risk-based, and objective assurance; advice, insight, and foresight, that meets rigorous professional standards.

The internal audit function enhances:

- Successful achievement of the Forces' objectives.
- Governance, risk management, and control processes.
- Decision-making and oversight.
- Reputation and credibility with the Forces' stakeholders.
- Ability to serve the public interest.

¹ The Joint Audit Committee performs the function of the board as defined by the Public Sector Internal Audit Standards.

The internal audit function is most effective when:

- Internal auditing is performed by competent professionals in conformance with the Institute of Internal Auditors Global Internal Audit Standards™ which are set in the public interest.
- The internal audit function is independently positioned with direct accountability to the PCC, Chief Constable and Audit Committee.
- Internal auditors are free from undue influence and committed to making objective assessments.

Commitment to Adherence to the Professional Standards

The Accounts and Audit (England) Regulations, state that: *“A relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account the public sector internal auditing standards or guidance.”*

The internal audit function will adhere to the mandatory elements of The Institute of Internal Auditors' International Professional Practices Framework, which are the Global Internal Audit Standards and Topical Requirements subject to the Application Note for UK Public Sector Internal Audit. The chief audit executive will report annually to the partner audit committee and senior management regarding the internal audit function's conformance with the Standards, which will be assessed through a quality assurance and improvement program, managed and monitored by the SWAP senior management team and the SWAP board.

Mandate

Authority

The PCC, Chief Constable and Audit Committee grants the internal audit function the mandate to provide the audit committee and senior management with objective assurance, advice, insight, and foresight.

The internal audit function's authority is created by its direct reporting relationship to the audit committee. Such authority allows for unrestricted access to the PCC, Chief Constable and audit committee.

The PCC, Chief Constable and audit committee authorises the internal audit function (subject to the appropriate vetting and security requirements for access) to:

- Have full and unrestricted access to all functions, data, records, information, physical property, and personnel and premises pertinent to carrying out internal audit responsibilities. Internal auditors are accountable for confidentiality and safeguarding records and information. Access extends to partner bodies and external contractors working on behalf of both organisations.
- Allocate resources, set frequencies, select subjects, determine scopes of work, apply techniques, and issue communications to accomplish the function's objectives.
- Obtain assistance from the necessary personnel of the Force and OPCC and other specialised services from within or outside both organisations to complete internal audit services.

Independence, Organisational Position, and Reporting Relationships

The chief audit executive will be positioned at a level in the organisation that enables internal audit services and responsibilities to be performed without interference from management, thereby establishing the independence of the internal audit function. The chief audit executive will report functionally to the audit committee and administratively (for example, day-to-day operations) to the PCC's Chief Financial Officer and the CC's Chief Officer for Finance, Resources and Innovation. This positioning provides the authority and status to bring matters directly to senior management and escalate matters to the audit committee, when necessary, without interference and supports the internal auditors' ability to maintain objectivity.

The chief audit executive will confirm to the audit committee, at least annually, the organisational independence of the internal audit function. If the governance structure does not support organisational independence, the chief audit executive will document the characteristics of the governance structure limiting independence and any safeguards employed to achieve the principle of independence. The chief audit executive will disclose to the audit committee any interference internal auditors encounter related to the scope, performance, or communication of internal audit work and results. The disclosure will include communicating the implications of such interference on the internal audit function's effectiveness and ability to fulfil its mandate.

Changes to the Mandate and Charter

Circumstances may justify a follow-up discussion between the chief audit executive, audit committee, and senior management on the internal audit mandate or other aspects of the internal audit charter. Such circumstances may include but are not limited to:

- A significant change in the Global Internal Audit Standards.
- A significant acquisition or reorganisation within the organisation.
- Significant changes in the chief audit executive, audit committee, and/or senior management.
- Significant changes to the organisation's strategies, objectives, risk profile, or the environment in which the organisation operates.
- New laws or regulations that may affect the nature and/or scope of internal audit services.

Audit Committee Oversight

To establish, maintain, and ensure that the internal audit function has sufficient authority to fulfil its duties, the audit committee will:

- Discuss with the chief audit executive and senior management the appropriate authority, role, responsibilities, scope, and services (assurance and/or advisory) of the internal audit function.
- Ensure the chief audit executive has unrestricted access to, communicates, and interacts directly with the audit committee, including in private meetings without senior management present.

- Ensure arrangements are in place to notify the chief audit executive of all suspected or detected fraud, corruption, or impropriety.
- Discuss with the chief audit executive and senior management other topics that should be included in the internal audit charter.
- Participate in discussions with the chief audit executive and senior management about the “essential conditions,” described in the Global Internal Audit Standards, which establish the foundation that enables an effective internal audit function.
- Approve the internal audit function’s charter, which includes the internal audit mandate and the scope and types of internal audit services.
- Review the internal audit charter [annually] with the chief audit executive to consider changes affecting the organisation, such as the employment of a new chief audit executive / head of internal audit or changes in the type, severity, and interdependencies of risks to the organisation; and endorse the internal audit charter [annually].
- Approve (but not direct) the risk-based internal audit plan.
- Collaborate with senior management to determine the budgets, qualifications, and competencies the organisation expects in a chief audit executive, as described in the Global Internal Audit Standards.
- Review the chief audit executive’s performance, provide feedback to the SWAP CEO, plus senior management, and the organisation’s CEO.
- Receive communications from the chief audit executive about the internal audit function including its performance relative to its plan.
- Ensure a quality assurance and improvement program has been established.
- Review of the results of the quality assurance and improvement program annually.
- Make appropriate enquiries of management and the chief audit executive to determine whether scope or resource limitations are inappropriate.

Chief Audit Executive Roles and Responsibilities

Ethics and Professionalism

The chief audit executive will ensure that internal auditors:

- Conform with the Global Internal Audit Standards, including the principles of Ethics and Professionalism: integrity, objectivity, competency, due professional care, and confidentiality.
- Understand, respect, meet, and contribute to the legitimate and ethical expectations of the Partner organisation and be able to recognise conduct that is contrary to those expectations.
- Encourage and promote an ethics-based culture in the organisation.

- Report organisational behaviour that is inconsistent with the organisation's ethical expectations, as described in applicable policies and procedures.

Objectivity

The chief audit executive will ensure that the internal audit function remains free from all conditions that threaten the ability of internal auditors to carry out their responsibilities in an unbiased manner, including matters of engagement selection, scope, procedures, frequency, timing, and communication. If the chief audit executive determines that objectivity may be impaired in fact or appearance, the details of the impairment will be disclosed to appropriate parties.

Internal auditors will maintain an unbiased mental attitude that allows them to perform engagements objectively such that they believe in their work product, do not compromise quality, and do not subordinate their judgment on audit matters to others, either in fact or appearance.

Internal auditors will have no direct operational responsibility or authority over any of the activities they review. Accordingly, internal auditors will not implement internal controls, develop procedures, install systems, or engage in other activities that may impair their judgment, including:

- Assessing specific operations for which they had responsibility within the previous year.
- Performing operational duties for the Partner organisation or its affiliates.
- Initiating or approving transactions external to the internal audit function.
- Directing the activities of any Partner organisation's employee that is not employed by the internal audit function, except to the extent that such employees have been appropriately assigned to internal audit teams or to assist internal auditors.

Internal auditors will:

- Disclose impairments of independence or objectivity, in fact or appearance, to appropriate parties and at least annually, such as the chief audit executive, audit committee, management, or others.
- Exhibit professional objectivity in gathering, evaluating, and communicating information.
- Make balanced assessments of all available and relevant facts and circumstances.
- Take necessary precautions to avoid conflicts of interest, bias, and undue influence.

Managing the Internal Audit Function

The chief audit executive has the responsibility to:

- At least annually, prepare, in consultation with the PCC (or delegated senior representative), Chief Constable (or delegated senior representative) and PCC CFO and CC CFO, and submit a risk-based internal audit plan to the audit committee and senior management for review and approval.
- Communicate the impact of resource limitations on the internal audit plan to the audit committee and senior management.

- Review and adjust the internal audit plan, as necessary, in response to changes in the Partner organisation's business, risks, operations, programs, systems, and controls.
- Communicate with the audit committee and senior management if there are significant interim changes to the internal audit plan.
- Ensure internal audit engagements are performed, documented, and communicated in accordance with the Global Internal Audit Standards.
- Follow up on engagement findings and confirm the implementation of recommendations or action plans and communicate the results of internal audit services to the audit committee and senior management [annually] and for each engagement as appropriate.
- Ensure the internal audit function collectively possesses or obtains the knowledge, skills, and other competencies needed to meet the requirements of the Global Internal Audit Standards and fulfil the internal audit mandate.
- Identify and consider trends and emerging issues that could impact the Partner organisation and communicate to the audit committee and senior management as appropriate.
- Consider emerging trends and successful practices in internal auditing.
- Establish and ensure adherence to methodologies designed to guide the internal audit function.
- Ensure adherence to the Partner organisation's relevant policies and procedures unless such policies and procedures conflict with the internal audit charter or the Global Internal Audit Standards. Any such conflicts will be resolved or documented and communicated to the audit committee and senior management.
- Coordinate activities and consider relying upon the work of other internal and external providers of assurance and advisory services. If the chief audit executive cannot achieve an appropriate level of coordination, the issue must be communicated to senior management and if necessary escalated to the audit committee.

Communication with the Audit Committee and Senior Management

The chief audit executive will report [annually] to the audit committee and senior management regarding:

- The internal audit function's mandate.
- The internal audit plan and performance relative to its plan.
- Significant revisions to the internal audit plan.
- Potential impairments to independence, including relevant disclosures as applicable.
- Results from the quality assurance and improvement program, which include the internal audit function's conformance with The IIA's Global Internal Audit Standards and action plans to address the internal audit function's deficiencies and opportunities for improvement.

- Significant risk exposures and control issues, including fraud risks, governance issues, and other areas of focus for the audit committee.
- Results of assurance and advisory services.
- Management’s responses to risk that the internal audit function determines may be unacceptable or acceptance of a risk that is beyond the Partner organisation’s risk appetite.
- Clarification over the responsibility to complete a fraud risk assessment, and presentation of this where responsibility belongs to SWAP.

Quality Assurance and Improvement Program

The SWAP Senior Leadership Team, in collaboration with the chief audit executive, will develop, implement, and maintain a quality assurance and improvement program that covers all aspects of the internal audit function. The program will include external and internal assessments of the internal audit function’s conformance with the Global Internal Audit Standards, as well as performance measurement to assess the internal audit function’s progress toward the achievement of its objectives and promotion of continuous improvement. The program also will assess, if applicable, compliance with laws and/or regulations relevant to internal auditing. Also, if applicable, the assessment will include plans to address the internal audit function’s deficiencies and opportunities for improvement.

Annually, the chief audit executive will communicate with the audit committee and senior management about the internal audit function’s quality assurance and improvement program, including the results of internal assessments (ongoing monitoring and periodic self-assessments) and external assessments. External assessments will be completed at least once every five years by a qualified, independent assessor or assessment team from outside both SWAP and the Partner Organisation; qualifications must include at least one assessor holding an active Certified Internal Auditor credential.

Scope and Types of Internal Audit Services

The scope of internal audit services covers the entire breadth of the organisation, including all the Partner organisation’s activities, assets, and personnel. The scope of internal audit activities also encompasses but is not limited to objective examinations of evidence to provide independent assurance and advisory services to the audit committee and management on the adequacy and effectiveness of governance, risk management, and control processes for the Partner organisation.

The nature and scope of advisory services may be agreed with the party requesting the service, provided the internal audit function does not assume management responsibility. Opportunities for improving the efficiency of governance, risk management, and control processes may be identified during advisory engagements. These opportunities will be communicated to the appropriate level of management.

Internal audit engagements may include evaluating whether:

- Risks relating to the achievement of the Partner Organisation’s strategic objectives are appropriately identified and managed.

- The actions of the Partner organisation’s officers, directors, management, employees, and contractors comply with the Partner organisation’s policies, procedures, and applicable laws, regulations, and governance standards.
- The results of operations and programs are consistent with established goals and objectives.
- Operations and programs are being carried out effectively and efficiently.
- Established processes and systems enable compliance with the policies, procedures, laws, and regulations that could significantly impact the Partner organisation.
- The integrity of information and the means used to identify, measure, analyse, classify, and report such information is reliable.
- Resources and assets are acquired economically, used efficiently and sustainably, and protected adequately.

Approval/Signatures

Chief Audit Executive

 Date

Audit Committee Chair

 Date

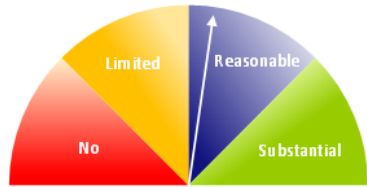
Chief Executive Officer (SWAP)

 Date

Audit Objective

To provide assurance that the Force has effective internal arrangements in place to continue the delivery of services in times of crisis or emergency.

Executive Summary



Assurance Opinion

The review highlighted a generally sound system of governance, risk management and control in place. We identified some issues, non-compliance or scope for improvement which may put at risk the achievement of objectives.

Management Actions

Priority 1	0
Priority 2	1
Priority 3	1
Total	2

Organisational Risk Assessment

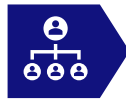
Low

Our audit work includes areas that we consider have a low organisational risk and potential impact. We believe the key audit conclusions and any resulting outcomes still merit attention, but could be addressed by service management in their area of responsibility.

Key Conclusions



Police forces are required to regularly test/exercise their Business Continuity Plans (BCPs) to ensure they are reliable and effective. The Force’s BCPs include a section for recording tests/exercises. We were cited on recent incidences where plans had been tested/exercised. However, our review of the strategic level BCP and a sample of eight service/tactical level BCPs found no documentation in relation to these incidences of testing/exercising. In addition, the Force does not test/exercise the workability of service/tactical level BCPs where functions are not one of the priority areas listed within the strategic level BCP. Therefore, we are unable to provide assurance on the actual reliability and workability of service/tactical level BCPs in the event of a disruption or emergency.



Service/tactical level BCPs are not always reviewed and approved by senior management. Senior management approval reinforces leaderships commitment to business continuity planning and highlights its importance to the organisation.



BCPs are reviewed annually, with the Contingency Planning Team (the ‘Team’) providing oversight and management of the process. The Team have been trained to the industry recognised standards Certificate Business Continuity Institute Good Practice Guidelines 2018. Business Impact Assessment (BIAs) have been conducted to assess the impacts of potential disruptions on service delivery, identify associated risks, outline mitigations and establish Recovery Time Objectives (the stated amount of time for restoring a business activity, process or system) (RTOs). BCPs are available on Pocketbook and Resilience Direct, with hard copies maintained within the respective service areas.

Audit Scope

- Corporate and service/tactical level BCPs in place to ensure that they are sufficient, comply with regulatory requirements and up to date.
- Scenario planning, tabletop exercises and recovery time testing of BCPs.
- Communication systems and protocols in the event of an emergency.
- Training and awareness of business continuity arrangements.

Conclusion

A generally sound system of governance and controls are in place to ensure BCPs are reviewed and updated annually. However, the Force should ensure BCPs receive formal approval from senior management and that any testing/exercising of BCPs is appropriately captured. BIAs have been completed to identify risk and mitigations for business activities across the Force, with RTOs assigned to service critical/priority functions. The key findings from our audit, together with actions, have been outlined below.



Appendix 1

Findings and Action Plan.

1.1 Recording testing/exercising of Business Continuity Plans.	1.1a Action												
<p>Police forces have a legal duty under the Civil Contingencies Act 2004 to prepare a Business Continuity Plan (BCP) to cover and mitigate the loss of critical business activities. A BCP cannot be considered reliable unless it is exercised and proven to be workable. The legislation therefore requires regular exercising/testing of BCPs but does not specify the frequency of testing/exercising as this is dependent on the organisation and activities that they perform.</p> <p>The Force has outlined the priority areas of its business that must be maintained in the event of an incident or emergency within its strategic BCP. These areas include Command and Control, Patrol, Operations, Investigations, Criminal Justice and others. The strategic BCP also includes mitigating activities for each of these priority areas to reduce the impact of potential disruption. National exercises that are set by the Home Office are completed annually to test the Force’s Command and Control structure. In addition, the Contingency Planning Team cited recent incidences of BCPs being enacted in live environments. For example, a Force-wide MS Teams outage which affected services across the organisation and protests in the summer of 2024 which impacted resources and increased demand on frontline services. Whilst testing/exercising takes place in relation to priority areas, these are not being captured within relevant BCPs as required under Force policy.</p> <p>We queried whether service/tactical BCPs that cover lower priority areas of the business were regularly tested/exercised to verify the achievability of their Recovery Time Objectives (RTOs) for service critical/priority activities listed within. We were informed that this was not done. We understand the difficulty, challenge and resource required to verify whether RTOs are actually achievable for lower priority areas. However, as these have not been tested, we are unable to provide assurance on the actual reliability and workability of service/tactical level BCPs in the event of a disruption or emergency. The Force would benefit from periodic testing of these, but we recognise that these are lower priority areas of the business that fall outside of the strategic BCP, and therefore it may not be practical and efficient to do so. As such, no action has been raised around testing the workability of service/tactical BCPs, however, we do advise that, if possible, these should be tested.</p>	<p>The Chief Inspector Operations Department to ensure testing/exercising of Business Continuity Plans is formally captured and recorded.</p> <table border="1" data-bbox="1444 890 2150 1061"> <tr> <td>Priority</td> <td>2</td> <td>SWAP Ref.</td> <td>5590</td> </tr> <tr> <td>Responsible Officer</td> <td colspan="3">Chief Inspector Operations Department</td> </tr> <tr> <td>Timescale</td> <td colspan="3">31/03/2025</td> </tr> </table>	Priority	2	SWAP Ref.	5590	Responsible Officer	Chief Inspector Operations Department			Timescale	31/03/2025		
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<p>1.2 Approval of BCPs.</p> <p>Eight service/tactical level BCPs (c.30% of all service/tactical level BCPs in place) were reviewed as part of our audit. The approval of these BCPs was checked ensure they had been reviewed and authorised by the appropriate individual. In the majority of cases, a Directorate Lead (or above) had reviewed and approved the BCP. However, in one instance (Estates BCP for Bridewell), a Facilities Manager was found to have approved the plan. We were informed by the Contingency Planning Team that the level of sign off for BCPs is determined by the department/service based on who they believe is the most suitable to do so. Given the nature of BCPs, an individual at a senior level should review and approve a BCP. This will help reinforce leaderships commitment to business continuity planning and highlight its importance to the rest of the organisation.</p>	<p>1.2a Action</p> <p>The Chief Inspector Operations Department to ensure BCPs are reviewed and approved by senior management.</p> <table border="1" data-bbox="1444 1257 2150 1420"> <tr> <td>Priority</td> <td>3</td> <td>SWAP Ref.</td> <td>5589</td> </tr> <tr> <td>Responsible Officer</td> <td colspan="3">Chief Inspector Operations Department</td> </tr> <tr> <td>Timescale</td> <td colspan="3">31/03/2025</td> </tr> </table>	Priority	3	SWAP Ref.	5589	Responsible Officer	Chief Inspector Operations Department			Timescale	31/03/2025		
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Responsible Officer	Chief Inspector Operations Department												
Timescale	31/03/2025												



1.3 Contacting officers and staff detailed within BCPs.

BCPs provide the contact details of key stakeholders who may be required in the event of an emergency or disruption. We called around 10% of stakeholders listed across our sample of eight BCPs to ensure their details were correct. Of the 24 individuals were called, 18 (75%) did not connect or went to voicemail. Of the 6 individuals that did answer, one was no longer responsible for the service, and another connected to a general enquiry line as opposed to the individual specifically noted. We accept that the testing performed to verify the accuracy of contact details is somewhat limited in that these calls were made on one specific day, during a certain timeframe and with no follow up calls undertaken. Therefore, no action has been raised in relation to the results from the testing. The findings have been detailed for management to determine whether any improvements could be made in light of them.

1.4 Training.

The Civil Contingencies Act 2004 requires police forces to put in place training programmes for those directly involved in the execution of BCPs should they be invoked. Training should cover the contents of the plan, how it should be invoked and implemented, key decision making, and the skills required to respond to a crisis or emergency. As part of the annual review of BCPs, the Contingency Planning Team engages with business continuity leads to discuss these key areas. However, no formal training is provided to those responsible for implementing BCPs. It is understood that existing training packages related to business continuity may be too generic and lack relevance to the specific needs of policing. As a result, we have not raised an action to introduce formal training for relevant individuals at this stage. Management however should monitor the availability of training programs and consider their adoption in the future if they become relevant to policing.

Audit Assessment of Agreed Themes

Theme	RAG Rating	Rationale
Leadership & Culture	Green	Good governance arrangements are in place to ensure BCPs are reviewed and updated annually with BIAs found to have been completed for service areas sampled.
Learning	Yellow	Our findings/observations above highlight gaps in documenting testing/exercising of BCPs.
Diversity & Inclusion	N/A	We have been unable to provide an opinion on diversity and inclusion specific to the business continuity processes we have reviewed.

Audit Objective

To provide assurance that the culture within the Tactical Support Team is in line with the Force's values.

Executive Summary



Assurance Opinion

The review highlighted a generally sound system of governance, risk management and control in place. We identified some issues, non-compliance or scope for improvement which may put at risk the achievement of objectives.

Management Actions

Priority 1	0
Priority 2	1
Priority 3	0
Total	1

Organisational Risk Assessment

Medium

Our audit work includes areas that we consider have a medium organisational risk and potential impact. The key audit conclusions and resulting outcomes warrant further discussion and attention at senior management level.

Key Conclusions



Data specific to the Tactical Support Team (TST), which includes Firearms, Roads Policing and Dogs, as well as whole Force data was reviewed. In addition, a survey was issued to around 200 TST employees and interviews were conducted with individuals from the department across both TST sites (Bridgwater and Almondsbury). The key findings/observations have been noted below with an action agreed to improve the culture within TST. This includes activity/initiatives to uphold a zero-tolerance approach to discrimination, bullying, and harassment; enhance the work-life balance of TST employees; change the perception of TST across the organisation; ensure that the efforts of TST staff are recognised by a visible senior management; and strengthen relationships within TST.



Those interviewed and surveyed spoke positively about the teamwork, professionalism, communication, support from direct line management and training opportunities within TST.

Audit Scope

- The Force's mission, vision and values of 'Caring', 'Courageous', 'Inclusive' and 'Learning' are present within TST and how these are applied within the department and if they are being adhered to by TST employees.
- A review of data and key performance indications specific to the TST and the Force as a whole to provide an insight into the culture within TST. This included recruitment, retention, diversity and inclusion, vacancies, promotion sickness, wellbeing, professional standards/conduct and overtime data. Other data was considered but could not be reviewed within the budget of the audit.
- A survey issued to officers and staff within the TST as well face-to-face interviews conducted with TST officers and staff during site visits to gauge an understanding of culture within TST.

Conclusion

The results from our data analysis and survey revealed a generally inclusive and respectful work environment, though concerns around discrimination, bullying, and harassment were reported by a minority. Issues such as poor work-life balance, limited recognition from leadership, and a lack of diversity were highlighted, alongside concerns about senior management visibility. While teamwork, professionalism and development opportunities within the TST were noted as strengths, there are some challenges in collaboration across teams, units and locations. The need to improve the perception of the TST across the organisation was also identified. Individuals we engaged throughout the audit were receptive of the review and open to discussions. The key findings and observations from our review are detailed within the Findings and Action Plan below.



1.1 Data analysis, survey and interview findings and observations.

We conducted a review of TST and whole Force data and issued a survey to approximately 200 TST employees, of whom 70 (35%) responded. Interviews were also carried out with officers and staff at both TST locations in Bridgwater and Almondsbury. The key findings and observations are summarised below and help provide an insight into and understanding of the culture within TST:

- 81% of respondents stated that they had not witnessed or experienced discrimination, bullying or harassment within TST personally, towards a colleague and/or to a member of the public. However, 13% reported that they had, while 6% preferred not to say. Among those who reported witnessing or experiencing such behaviour, one individual mentioned feeling that they did not fit the mould of a 'traditional TST officer'. Another reported overhearing criticism of a woman for being on long-term sick leave, and another cited incidences of verbal bullying and singling out of certain officers. One respondent described receiving provocative comments about their body and having social media photos of them circulated within the department. Data analysed over a three-year period revealed that approximately 3% of all cases referred to the Professional Standards Department involved a TST employee.
- 38% of respondents rated their work-life balance as poor or very poor. Over 50% of survey respondents expressed satisfaction with their current role, while over a quarter were dissatisfied, and about 20% remained neutral. Overtime data revealed that approximately 11% of TST employees worked over 48 hours in one or more weeks within a 12-month period compared to 2% of the rest of the organisation. TST employees also accounted for around 6% of all overtime hours claimed during the same period and 4% of total absence/sickness hours.
- 73% of survey respondents either agreed or strongly agreed the work environment was inclusive and respectful. However, some expressed a need for greater diversity within TST, noting a 'male-dominated' environment. Currently, 80% of TST employees identify as male, compared to 46% across the rest of the organisation. Additionally, 86% of TST employees identify as white, compared to 90% Force-wide.
- Some respondents expressed feeling a lack of recognition from senior leadership and the Chief Officer Group (COG). Just over 50% of respondent reported feeling appreciated for the work that they did, while a quarter felt unappreciated, and another quarter remained neutral. Additionally, 50% of respondents either agreed or strongly agreed that they received regular feedback on their performance.
- Survey respondents highlighted concerns regarding senior management visibility within TST, with around 26% indicating that leaders were not approachable. However, 73% of participants either agreed or strongly agreed that they felt supported by their line management
- Individuals we spoke with at Bridgwater (an open-plan PFI building housing multiple services) felt that the team at Almondsbury were siloed and isolated. Some individuals felt that Almondsbury should be demolished. In contrast however, those we spoke to at Almondsbury (a building exclusively for TST employees) did not share these views.
- Survey respondents highlighted a strong sense of teamwork, professionalism, and collaboration within TST. However, individuals we spoke with onsite mentioned that collaboration between different teams and locations could be improved,

1.1 Action

The Head of Tactical Support to:

- Reinforce a zero-tolerance approach to discrimination, bullying and harassment within TST.
- Improve the work life balance of TST employees through a wider departmental change programme that will introduce a change to shift patterns, which should reduce the need for overtime. This work is planned to be completed by July 2025.
- Ensure efforts/work of TST employees is recognised through the Force's wider recognition processes and to explore how this could be done more locally.
- Change the perception of TST across the organisation by increasing visibility and engagement across the Force. This will be an objective of the wider change programme.
- Increase visibility of senior management at TST locations/sites by creating leadership weekly plans which should ensure more time is spent by senior management at different locations.
- Build and improve relationships across TST units, teams and locations. This will be an objective of the wider departmental change programme.
- Improve TST resources and the use of existing resources. This will be an objective of the wider departmental change programme.

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Responsible Officer	Head of Tactical Support		
Timescale	31/07/2025		



though accepted that shift patterns and geography often make it challenging to build relationships with colleagues from other teams, units and locations.

- Respondents also highlighted inadequate resourcing and staffing as a concern. As of the end of July 2024, TST had an 11% vacancy rate, which is higher than the Force-wide average of just under 4%. Additionally, some respondents felt that TST specialist skills were not being utilised effectively, with officers assigned to jobs/tasks unrelated to their specialisms/skills.
- Survey respondents and individuals we interviewed emphasised the need to improve the perception of TST across the organisation and to raise its profile, with some noting that TST is viewed as an elitist department.

Audit Assessment of Agreed Themes

Theme	RAG Rating	Rationale
Leadership & Culture		Our rating is reflective of the comments made by those interviewed and surveyed in relation to senior management and the COG.
Learning		Our findings/observations above highlight potential areas of learning.
Diversity & Inclusion		Our rating is reflective of the current diversity profile of officers and staff within TST.