

SUMMARY OF RECOMMENDATIONS

Audit Report & Recommendations	Priority 1 or 2	Timescale for completion of Recs.	Manager Responsible	Date of JIAC Mtg Recs. Presented To
<p>Counter Fraud – February 2020 – Rec. 4.3 The Force and OPCC should review the current Fraud Awareness training that is provided to new starters to confirm if it meets the needs of the Force and OPCC. The Force/OPCC should ensure that regular refresher training is completed so that staff have awareness of Fraud and Corruption. It should also be considered how and who will monitor the completion of any training. The Force/OPCC should consider carrying out a training needs analysis to establish which areas of the Force have a higher risk of fraud and corruption and then consider if tailored training needs to be rolled out.</p> <p>Management Response – a) Anti-fraud and Corruption Steering Group (AFCSG) agree that formal training needs analysis (TNA) should be conducted. RPO to investigate scope and commissioning with the Commercial Partnership Team in the first instance. B) Following completion of the TNA a training action plan will be developed and agreed by the AFCSG for implementation.</p> <p>Update May 2020 – Training Needs Analysis (TNA) requirements have been discussed with L&D (and they have provided supporting documentation). A brief questionnaire has been sent out to those organisational areas identified as higher risk (based on the Fraud Risk register). The existing mandatory induction training module is being assessed to ensure it remains relevant / current. The survey will be returned to L&D by the 15 May 2020 and L&D has been asked to prepare an update for the next AFCSG meeting on the 3 June 2020.</p> <p>Update Jul 2020 – The training needs analysis proposal was presented to the AFCSG on the 30 June 2020. The group did not accept the proposal and decided that further work was required to fully meet the counter fraud training requirements. The group decided to consider further what the wider counter fraud training requirements are, specifically including the procurement fraud related elements. This has been placed on the agenda for the next scheduled AFCSG meeting in October 2020.</p> <p>Update Sept 2020 – September AFCSG meeting requested that further information be sought by the RPO regarding the scoping process for counter fraud training needs – RPO to consult with LCFP on their approach to scoping of counter fraud / corruption training needs. RPO to report back to December 2020 AFCSG.</p> <p>Update Jan 2021 – The October AFCSG requested that the RPO investigate how scoping for counter fraud training was conducted by the LCFP and report back to the December AFCSG to help inform the next steps in revising the training provision. At the December AFCSG it was agreed that a separate meeting outside of the AFCSG schedule be arranged to discuss in more detail the scope and agree next steps in determining the training required and how it should be delivered.</p>	2	<p>Original Timescale a) 31.03.20 b) Dependent on the above date</p> <p>Revised Timescale 30.06.20</p> <p>Revised Timescale 31.12.20</p> <p>Revised Timescale 31.12.21</p>	RPO	<p>10.06.2020</p> <p>25.11.2020</p> <p>26.01.2021</p> <p>28.04.2021</p> <p>11.11.2021</p>

<p>Update Apr 2021 – On the 7th of April 2021 Members of the AFCSG held a counter fraud and corruption Training review meeting. (outside of the quarterly meeting schedule)</p> <p>Key points / actions arising are:</p> <ul style="list-style-type: none"> • The training needs analysis produced in Feb 2020 was used as a basis for discussion covering the 3 top risk areas and the primary elements of training i.e. revised Induction training / introduction of refresher training (inc. monitoring & management) / and new role specific training. • Generic induction training module (delivered via NCALT) is being refreshed and will be completed by the end of April 2021 – implementation date is to be confirmed. • Refresher training is to be introduced (using generic module – for non-specialist roles). There will need to be further work conducted on how completion of refresher training will be monitored and managed (a 2-year refresher cycle was proposed). • Role specific training for managers / budget holders will be introduced – utilising an off the shelf module from an external provider. • Specialist procurement training / guidance will be provided to appropriate team members as and when required i.e. those involved in project work e.g. Tech Futures / Estates who are involved in the procurement process / evaluation of bids etc. • Financial regulations training package previously developed to be re-assessed for suitability / implementation. <p>All actions were assigned owners from across the AFCSG membership – target delivery dates for key actions are to be confirmed by each owner following circulation of the action log and progress reported at the next scheduled AFCSG meeting on 9th June 2021. Further extraordinary meetings of the AFCSG are to be arranged should the need arise.</p> <p>Update Aug 2021 – (Note: Planned June AFCSG Meeting rescheduled to July 2021).</p> <ul style="list-style-type: none"> • Induction and refresher training module content updated by Head of PSD and copy provided to July AFCSG for feedback / approval. • L&D awaiting completion of recruitment process for specialist role to convert new module content into format appropriate for use on NCALT training system. (Recruitment scheduled for completion by the end of August 2021). • Responsibility for establishing a method of scheduling refresher training was passed to the head of L&D – who will be invited to the next AFCSG meeting. • Timescales for AFCSG action log contents are to be confirmed at their next meeting - rescheduled for October 2021. <p>Note: Due to the current high workloads in multiple departments involved in this work the finalisation / confirmation of planned delivery dates was moved back from July to the next AFCSG meeting.</p>				
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<p>Update Nov 2021 – (Note: Planned Sept AFCSG Meeting rescheduled to 4th October 2021).</p> <ul style="list-style-type: none"> • Induction and refresher AF&C training module content completed by PSD and ‘translated’ into NCALT package by L&D – images used are now being refreshed to better reflect diversity of workforce, complete package should be ready for rollout across the force from End of December 2021 – start of January 2022. • L&D have no automated system for tracking who has completed the training – manual monitoring by departmental officers / supervisors proposed as solution for tracking uptake. • Timescales for AFCSG action log contents were discussed at October 2021 meeting – some training requirements for financial and procurement workstreams require further discussion between CFO’s to determine available capacity and confirm solutions for delivery of the proposed work– target delivery dates deferred to next AFCSG meeting in December 2021. <p>Note: Due to the current high workloads in multiple departments involved in this work the finalisation / confirmation of planned delivery dates was again moved back from October to the next AFCSG meeting in December 2021.</p>				
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<p>Counter Fraud – February 2020 – Rec 4.4 The Force and OPCC should consider ensuring that the fraud risk register is specific in nature and thus does not replicate existing risk management systems.</p> <p>Management Response – Roles and responsibilities for the management of the Fraud Risk Register and the reporting mechanisms associated with it were agreed at the AFCSG meeting in January 2020 (action plan in place). The update of policies and procedures associated with the fraud risk register scheduled within action plan dependent on each document/stage of implementation.</p> <p>Update May 2020 - The Antifraud and corruption policy (PD161) has been refreshed to incorporate reference to the Fraud Risk Register and bring it up to date with recent changes in police regulations. (Completed and Approved by HoPSD and RPO) Minor updates to policy template underway – due for completion by the end of May. A new joint Anti-fraud and corruption strategy has been drafted and approved by HoPSD and RPO – due for ratification by OPCC CEX by the end of May. Review of content of Draft Fraud risk register scheduled for completion by end of June (to be conducted by FRPRO and RPO). Refresh of Risk management policies and strategies to include reference to fraud risk register and associated processes – scheduled for completion by end of September 2020. Briefings for Fraud risk register SPOCS and associated staff are under construction – schedule for completion by end Sept 2020. The AFCSG meeting which was scheduled to be held in April was cancelled due to availability of attendees. Agenda items will be rolled over to the June meeting.</p> <p>Update Sept 2020 – 1. The Antifraud and corruption policy (PD161) refresh has been completed. (Approved by Force / OPCC). 2. A new joint Anti-fraud and corruption strategy has been completed. (Approved by Force / OPCC). 3. Review of content of Draft Fraud risk register– Issues raised during discussion at September 2020 AFCSG prompted further meeting between Internal Auditor, RPO / FRPRO on 29th Sept 2020. Actions arising from this meeting include consideration by RPO / FRPRO of alternative format for recording of fraud risks and greater engagement with operational leads within risk areas / functions. Potential solutions to the issues raised are to be agenda item at Dec 2020 AFCSG. 4. Refresh of Risk management policies and strategies to include reference to new fraud risk register and associated processes – progress is pending decision on above point (3). 5. Briefings for Fraud risk register SPOCS – progress is pending decision on above point (3). Note- programme of planned AFCSG meetings affected by availability of key attendees some meetings cancelled / postponed – revised workplan under construction.</p>	2	<p>Original Timescale 30.09.20</p> <p>Revised Timescale 31.12.20</p> <p>Revised Timescale 31.12.21</p>	OPCC / Force	<p>10.06.2020</p> <p>25.11.2020</p> <p>26.01.2021</p> <p>28.04.2021</p> <p>11.11.2021</p>

<p>Update Jan 2021 – The rollout of the current Fraud risk register has been paused while its format is reviewed with a view to developing a new format that highlights and focusses more on the ‘day to day’ practical fraud risks faced rather than the currently very broad approach encompassing generic ‘theoretical’ fraud risks. The FRPRO, RPO and the internal audit manager are to schedule an initial meeting to discuss the proposed new format in early 2021.</p> <p>Update Apr 2021 – A meeting between the Audit manager, FRPRO and RPO will be held before the June 2021 AFCSG to allow for a revised approach to the current draft register be proposed at the meeting. Subject to approval of the proposal an action plan will then be produced including new target delivery dates. At this stage the revised timescale for implementation remains December 2021 as available resources and capacity to conduct the work are yet to be confirmed.</p> <p>Update Aug 2021 – (Note Planned June AFCSG Meeting rescheduled to July 2021) A meeting between the Internal Audit Manager, FRPRO and RPO is scheduled for 3rd September to discuss the proposed use of a fraud risk matrix to manage specific fraud risk without duplicating existing risk processes. An action plan including timescales is pending the outcome of this meeting. The work of the Future Services Programme (FSP) will also need to be considered in any implementation plan. (Target date remains December 2021).</p> <p>Update Nov 2021 – (Note: Planned AFCSG meeting moved from September to 4th October 2021). A meeting between the Internal Audit Manager, FRPRO and RPO was held on 3rd September to discuss the proposed use of a fraud risk matrix to manage specific fraud risk without duplicating existing risk processes. A revised approach was agreed and the RPO is to provide a DRAFT version of the Fraud Risk Matrix and briefing to the December 2021 AFCSG meeting for discussion / approval before an implementation plan can be created. (Target date and plan for implementation likely to be revised following December meeting plus the work of the Future Services Programme (FSP) will also need to be considered in the timeline of any implementation plan).</p>				
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<p>Payments & Creditors – Mar 2021 – Rec. 4.2 Procurement Exceptional Purchase Action (EPA) – The Force should investigate the six contracts reviewed by audit further, to determine why this has happened and identify any additional instances where this has occurred. The Force should also consider procurement training to all relevant staff. This should include guidance on the use of exceptions to the Contract and Procurement Regulations and the stages which need to be satisfied before the service delivery of the contract can begin.</p> <p>Management Response The PCC/CC take the breaches of Contract and Procurement Regulations extremely seriously. We will be looking to issue clear communications to all appropriate officers and staff on this matter. We will also review our guidance on EPA's to ensure that it's both clear and appropriate.</p> <p>Update Apr 2021 – Details have been obtained of the 6 contracts for which retrospective EPA's were raised and the circumstances in which this occurred. The findings will be discussed by the Chief Officer Team and a future action plan agreed by 30 April 2021.</p> <p>Update Aug 2021 – The issues regarding retrospective EPA's has been discussed with the Chief Officer Team and a procedure agreed going forward. No further instances have since occurred. This recommendation is now complete.</p>	1	<p>Original Timescale 30.04.21</p> <p>COMPLETE</p>	Force CFO	<p>28.04.2021</p> <p>11.11.2021</p>
<p>Collaboration – Business Continuity – Mar 2021 – Rec. 4.2 EMSOU should ensure that BC Plans across the unit are in place and up to date. Once the Plans are up to date the unit should ensure that they are regularly reviewed and updated, it should be considered that the Risk, Assurance & Compliance Meeting are provided with oversight to ensure that the review and updates take place.</p> <p>Management Response BC Plans have now been written and approved by Notts BC Manager. A tabletop exercise now needs to take place to test these (being planned) and once this is done the plans can be published within EMSOU.</p> <p>Update Aug 2021 – The BC plans have now been written and approved by the Notts BC Manager. A test exercise has taken place and the plans have been published. This recommendation is now complete.</p>	2	<p>Original Timescale 30.04.21</p> <p>COMPLETE</p>	Muhammad Patel	11.11.2021

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<p>Collaboration – Business Continuity – Mar 2021 – Rec. 4.3 EMSOU SOC, EMCJS and EMCHRS OHU should carry out testing/exercising of all Business Continuity Plans on a regular basis to ensure they remain fit for purpose. Consideration should be given for the Force BC Managers to assist all the collaboration units with appropriate tests of their plans e.g. desktop-based exercises.</p> <p>Management Response EMSOU – We intend to introduce BC testing once our plans have been updated. The EMSOU Support Manager will coordinate the testing for EMSOU SOC in consultation with Notts Police. The frequency of testing will also be consistent with Notts police. Discussions are ongoing about the best form for a test to take. It is hoped to carry this out within a few weeks.</p> <p>Update Aug 2021 – As above we have introduced testing for BC plans and the first test has taken place. The EMSOU Support Manager will coordinate future testing requirements for EMSOU SOC in consultation with Notts Police. The frequency of testing will also be consistent with Notts police and we have asked the Notts BC Manager to incorporate EMSOU in their planning cycle. This recommendation is complete.</p>	2	<p>Original Timescale 30.04.21</p> <p>COMPLETE</p>	Muhammad Patel	11.11.2021
<p>Workforce Planning – May 2021 – Rec 4.1 The Force should complete a mapping exercise and produce a centralised log of all key roles across the organisation, including non-leadership roles which are critical or specialised. Alongside this exercise, individuals who are able to assume these positions in a short / medium / long term capacity should be highlighted.</p> <p>Management Response – Agreed. A Force Lead will be identified to work to identify the key roles. HR will support the Force lead in developing succession planning models for the roles and maintain the centralised log going forward.</p> <p>Update Aug 2021 – A Force lead has not yet been identified but this will be addressed at the People Board. The Target Operating Model has been determined and is in the implementation stages running through to April 2023. Initial observations are the development of a succession planning model for Detective roles and Firearms roles – consideration will be given to the newly developed Roads Policing Unit roles. These are those areas whereby enhanced training is given and there are multiple roles to meet the demand force wide. Whilst a framework is in its infancy, once a Force lead is identified to lead this, we are yet to determine the capabilities of the ERP system (t-Police) which will hold data and produce information enabling robust succession planning. Without the investment and development here, this moves to a manual task which is not conducive to efficient planning. In summary, this will be addressed within the People Board and aligned to the strategic priorities overall within the IT function who will be instrumental in enabling the system use. This is in motion as part of the tactical training group work and will be finalised at the People Board in the first quarter of 2022/23.</p>	1	<p>Original Timescale To be agreed. This cannot be completed until the Target Operating Model work within the Future Services Programme has been completed.</p> <p>To be finalised at the People Board in the first quarter of 2022/23</p>	Director of People Services	11.11.2021

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<p>Workforce Planning – May 2021 – Rec 4.3 Lincs should undertake a Skills Analysis or associated activity of their current Workforce that can be used to benefit the training programme. A centralised log to record when training has been undertaken and when it needs to be re-taken should be developed and used when reviewed future training needs.</p> <p>Management Response – There is scope within the existing ERP system – t-police – to capture a skills profile required against each role within the Force. This will enable details to be reported upon whereby skills are required for officers in particular roles and assist with the annual training planning and training demand and delivery thereafter. The immediate requirement is for the Force to identify what competencies they require each role to hold. This is being scoped initially and will be taken to a COT/CPT lead for sign off before implementation into t-police. It is anticipated that this will be developed in the first quarter of 2021/22.</p> <p>Update Aug 2021 – This is already in situ. T-Police captures training completed and tracks when the next training is due thereby enabling our mandatory training demand to be identified for the following years training plan. A full skills analysis and skills matrix is yet to be developed and additional resources would be required to dedicate time to this over a defined period. In the first instance, now we have clarity that t-Police as the ERP system will be remaining in place for at least the next two years we are able to work with Cap Gemini to identify how the skills matrix can be held on the system under each established role. This is still in the development stages amongst a range of priorities. This is subject to the demands on the IT programme delivery and Cap Gemini works but will aimed to be in the second quarter of 2022/23.</p>	1	<p>Original Timescale 30.06.21</p> <p>Revised To Second Quarter of 2022/23</p>	Director of People Services	11.11.2021
<p>Commissioning Follow Up – June 2021 – Rec. 4.1 The Commissioning Framework should be finalised to ensure a clear and consistent approach to commissioning to adopted.</p> <p>Audit Finding – June 2021 – Audit have confirmed that the Commissioning Strategy has been finalised, with an introduction date of April 2021. It is next due for review in February 2022. Through review of the Strategy, it has been noted that this includes a framework that outlines the strategic approach to commissioning. This is based on a four-step approach that results in a cyclical treatment of commissioning, with activities under the subheadings of “understand, plan, do and review”. This should support Lincolnshire in ensuring that a consistent approach to commissioning is maintained.</p>	2	Outcome Implemented	Partnership & Delivery Manager	11.11.2021

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<p>Commissioning Follow Up – June 2021 – Rec. 4.2 The OPCC should ensure that a signed copy of all commissioning contracts are retained. The OPCC should consider whether signed copies of commissioning contracts should be retained by themselves or the Force Procurement team.</p> <p>Audit Finding – June 2021 – Audit have confirmed that in line with the Financial contract and procurement regulations, master contracts are retained by the Strategic Procurement Unit, with the commissioning team also retaining a copy of the contract. Audit performed a walkthrough over five commissioned contracts entered into since November 2020, where it was confirmed that in all instances the OPCC had retained a signed copy.</p>	2	Outcome Implemented	Partnership & Delivery Manager	11.11.2021
<p>Commissioning Follow Up – June 2021 – Rec. 4.3 The OPCC should review the Decision Note Policy and provide clarity on how and when it will publish decisions made in regard to commissioning activities. It should further review the decision records and include the rationale behind why the selected method for commissioning was deemed to be the most suitable in that instance.</p> <p>Audit Finding – Audit have noted that Lincolnshire have not updated the decision-making policy. Lincolnshire have introduced a Commissioning Strategy, in line with recommendation 4.1, however this does not address the ambiguity in respect of the publication of decisions. Further to the above, Audit noted that six Commissioning contracts were entered into since November 2020. Of these, Audit were only able to evidence the upload of two respective decision notes. Therefore, four decision notes have not been uploaded or published for transparency.</p> <p>Management Comments – There is no ambiguity in the Decision-Making Policy in terms of commissioning. Paragraph 1.7 is clear that the PCC's decisions in respect of commissioning are considered to be of significant public interest. That is why the PCC has recently taken and published a decision setting out his Commissioning Strategy and Plan for 2021/22. Many of the decisions which will flow from the Commissioning Strategy and Plan will be taken by the Commissioners staff, in accordance with powers delegated to them. Where subsequent decisions involve the PCC, they will be published in accordance with the Decision-Making Policy.</p> <p>Of the six commissioning contracts entered into since November 2020, four were the subject of delegated decision making and were not therefore published as a PCC decision.</p>	2	Outcome Not Implemented	Partnership & Delivery Manager	11.11.2021

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<p>Wellbeing – Oct 2021 – Rec. 4.2 The Force should ensure that all wellbeing initiatives are supported by data monitoring and analysis, so that the need for initiatives can be clearly evidenced and resources can appropriately be allocated. Management information should be produced for new wellbeing initiatives and management information reports should be presented at the appropriate governance forums on a regular basis e.g. monthly or quarterly. Where HR attend EMOHU meetings which include management information discussions, relevant information should be shared back to the Wellbeing Programme Board which HR also attend.</p> <p>Management Response – a) – The EMOHU meetings are now attended by the Head of Wellbeing, which resolves the data sharing aspect. The Head of Occupational Health also now attends the Wellbeing Programme Board, this should ensure that following any publication of EMOHU KPIs there is someone at the Wellbeing Programme Board that could summarise these statistics to the group. b) – The Head of Health & Wellbeing will also ensure consideration of statistical data has been considered when procuring new services. c) – The introduction of a new software system (Qlik) may allow the sharing of more meaningful data once the HR source system is added to into Qlik (timeframes currently unknown).</p>	2	<p>Original Timescale</p> <p>a) 30.09.21 COMPLETE</p> <p>b) 31.12.22 or until such a time that no new services are introduced</p> <p>c) 30.09.22 estimated timeframe provided of 6-12 months to link HR source system to Qlik</p>		11.11.2021

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<p>Recruitment – Follow Up – April 2021 – Rec. 4.4</p> <p>This recommendation is an addition and is in reference to action 363. Management Response with progress update has been added below.</p> <p>Temporary Contracts – The Force should develop a clear policy on the use of temporary contracts. This should include but not be limited to: - Extensions to temporary contracts, Maximum length of temporary contracts, Process to be followed when end date of temporary contract is approaching. The Force should review all staff on temporary contracts that are approaching their expiration date to ensure a clear and consistent approach is followed. The Force should ensure that, for any staff moving from temporary to permanent contracts, a fair and transparent recruitment process has been followed.</p> <p>Management Response – Extensions to FTC always need approval through whatever process is current at the time (currently P785 process). There is no maximum length other than the legislative 4-year point – the Force would not want to impose a maximum length as is dependent upon circumstances. The temporary to permanent issue was raised solely due to one individual's appointment as a selection process wasn't applied, they didn't go through a selection process at the outset, whereas all others have always done so. The current recruitment policy sets out a clear selection process for permanent appointments which ensures a fair and transparent process is followed. This was an isolated event in which this selection process was not followed due to exceptional circumstances and unlikely to recur. As such, there is no policy in place for this at the moment.</p>	2	Original Timescale	Head of HR / FCFO	11.11.2021