

Police and Crime Commissioner for Gwent and the Chief Constable Gwent Police

Summary Internal Controls Assurance (SICA) Report

November 2024

Draft



Summary Internal Controls Assurance

Introduction

1. This summary controls assurance report provides the Joint Audit Committee with an update on the emerging Governance, Risk and Internal Control related issues and the progress of our work for Gwent Police as at 18th November 2024.

New Internal Audit Code of Practice (Global Internal Audit Standards)

2. The new Internal Audit Code of Practice (the Code), which sets out fundamental principles for running a strong and effective internal audit function, for the first time presents a unified Code that encompasses the financial services, private, and third sectors.

The Code reflects the final recommendations of the Independent Internal Audit Code of Practice Review Committee and has received full endorsement by the Chartered Institute of Internal Auditors' Council. The Global Standards urge Boards and Audit Committees across the financial, private and third sectors to adopt and implement the Code's principles, embarking on their path to full compliance. Embracing these principles will maximise the value of internal audit and unlock the full potential of the profession.

The purpose of the Code

The principles of the Code are aimed at enhancing the overall impact and effectiveness of internal audit within organisations operating in the UK and Ireland. They are regarded as a benchmark of good practice against which organisations should assess their internal audit function.

Who is it for?

The intended audience for the Code includes members of the board and audit and risk committees, chief audit executives, non-executive directors, senior management, and, where appropriate, regulatory bodies. The Code is intended to be applied by all organisations in the financial services, private and third sectors with an internal audit function and a board audit committee of independent non-executive directors or their equivalent. This Code may prove useful for internal audit in the public sector, but it is not drafted with the public sector specifically in mind. Public sector internal audit functions should continue to follow the Public Sector Internal Audit Standards.

How should it be applied?

The Code should be applied in conjunction with the International Professional Practices Framework and the Global Internal Audit Standards. The Code builds on these Standards and seeks to increase the impact and effectiveness of internal audit. The Code is principles-based. It is expected that the principles are applied proportionately, in line with the nature, scope and complexity of the organisation. Internal audit functions should apply the Code in the context of internal audit regulatory standards applicable to the organisation.

See Appendix D for further information and available resources



Audits completed since the last SICA report to the Joint Audit Committee

3. The table below sets out details of audits finalised since the previous meeting of the Joint Audit Committee.

Audits completed since previous SICA report

			Number of Recommendations					
Review	Evaluation	Draft issued	Responses Received	Final issued	1	2	3	OEM
Vetting	Substantial	20 th August 2024	16 th October 2024	16 th October 2024	-	-	-	1
Collaborative - Health and Safety	Reasonable	3 rd October 2024	5 th November 2024	7 th November 2024	-	4	7	-
HR Management – Absence Management	Reasonable	2 nd October 2024	7 th November 2024	11 th November 2024	-	2	6	-

4. There are no issues arising from these findings which would require the annual Head of Audit Opinion to be qualified.

Progress against the Annual Plans 2023/24 and 2024/25

5. Our progress against the Annual Plan for 2023/24 and 2024/25 is set out in Appendix A and Appendix B. Three of eighteen (17%) of planned reviewed have been issued as Final and further four reviews have been issued as draft (22%).

Changes to the Annual Plan 2024/25

6. No changes have been made to the planned work for 2024/25.

Progress in actioning Urgent (Priority 1) recommendations

7. We have made no Priority 1 recommendations (i.e. fundamental control issue on which action should be taken immediately) since the previous SICA.

Frauds/Irregularities

8. We have not been advised of any frauds or irregularities in the period since the last SICA report was issued.

Other Matters

9. We have issued a number of briefing notes and fraud digests since the previous SICA report, shown in Appendix C.

Responsibility/Disclaimer

10. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. The matters raised in this report not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. No responsibility to



any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.



Appendix A: Progress against Annual Plan 2023-24

System	Planned Quarter	Current Status	Comments						
Collaborative									
Data Protection Act	2	Final Report Issued 18/07/2024	All four forces. Lead force: Gwent Police Presented to JAC September 2024						
Payroll	3	Final Report issued: 01/02/2024	All four forces. Lead force: North Wales Police Presented to JAC March 2024						
Debtors	3	Final Report issued: 08/02/2024	All four forces. Lead Force: Dyfed-Powys Police Presented to JAC March 2024						
Counter Fraud	3	Final Report issued: 08/05/2024	All four forces. Lead Force: North Wales Police Presented to JAC June 2024						
Telematics	4	Final Report issued: 19/06/2024	All four forces. Lead force: South Wales Police Presented to JAC July 2024						
Creditors	2	Final Report issued: 22/01/2024	The three forces are South Wales Police, Gwent Police and Dyfed Powys Police. Lead force: Dyfed Powys Police Presented to JAC March 2024						
Treasury Management	3	Final Report issued: 18/12/2023	The three forces are South Wales Police, Gwent Police and North Wales Police. Lead force: North Wales Police Presented to JAC March 2024						
Risk Management	3	Final Report issued: 15/12/2023	The three forces are Gwent Police, Dyfed Powys Police and North Wales Police. Lead force: Gwent Police						
Joint Scientific Investigation Unit (Gwent Police and South Wales Police)	2	Final Report issued: 06/10/2023	The two forces are Gwent Police and South Wales Police. Lead force: South Wales Police Presented to JAC March 2024						



System	Planned Quarter	Current Status	Comments
Firearms Licencing (Gwent Police and South Wales Police)	3	Final Report issued: 08/02/2024	The two forces are Gwent Police and South Wales Police. Lead force: Gwent Police Presented to JAC March 2024.
Information Disclosures (Gwent Police and South Wales Police)	4	Final Report issued: 04/12/2023	Suggested that dates are brought forward in light of high-profile FOI breaches. The two forces are Gwent Police and South Wales Police. Lead force: Gwent Police Presented to JAC March 2024
HR Recruitment and Training	4	Fieldwork commenced: 22/01/2024	Deferred to 2024/25
Gwent Police Only			
Strategic Planning	1	Final Report issued: 19/11/2023	Presented to JAC November 2023
Proceeds of Crime Act 2002 (POCA)	1	Final report issued: 24/10/2023	Presented to JAC November 2023
Complaints Handling (OPCC)	1	Final report issued: 10/11/2023	Presented to JAC November 2023
Expenses and Additional Payments	2	Final report issued: 09/02/2024	Presented to JAC March 2024
Budgetary Control	3	Final Report issued: 22/01/2024	Presented to JAC March 2024
Pensions	3	Final Report issued: 16/05/2024	Presented to JAC June 2024
Commissioning	3	Final Report issued: 01/12/2023	Presented to JAC November 2023
Contract Management	4	Final Report Issued 18/07/2024	Presented to JAC September 2024
Service Improvement Board	4	Final Report Issued 18/07/2024	Presented to JAC September 2024
Estates Management - Delivery	4	Draft Report issued: 06/11/2024	
Follow Up – Interim	3	Interim Draft Report issued: 20/03/2024	
Follow Up – Year End	4		To be confirmed.
Contingency	1-4	ТВС	2 Days – not used.



System	Planned Quarter	Current Status	Comments
Annual Planning	1-4	Final Plan issued: 19/06/2024	
Annual Report	1	Draft Report issued: 30/05/2024	
Audit Management	1-4		

KEY:



Appendix B: Progress against Annual Plan 2024-25

System	Planned Quarter	Current Status	Comments
Collaborative			
Uniform Stores	2	Draft report issued 11/10/2024	
Health and Safety	2	Final report issued 07/11/2024	Presented to JAC November 2024
Sustainability	2	Fieldwork to commence 02/12/24	
Payroll	3	Fieldwork to commence :27/11/2024	
ISO Accreditation	3	Cancelled by each force	
Connect Teams Channel	4	Cancelled by each Force	
Gwent Police Only			
Proceeds of Crime Act 2002 (POCA)	1	Final Report Issued: 01/07/2024	Presented to JAC September 2024
HR Management – Absence Management	1	Final report issued 11/11/2024	Presented to JAC November 2024
Business Continuity Management	2	Draft report issued 18/11/2024	
Contract Management	2	Suggested date 10/03/2025	
Vetting	2	Final report Issued: 16/10/2024	Presented to JAC November 2024
HR Management – Skills Map and Planning	2	Suggested date 03/02/2025	
Occupational Health – Referral, Process and Cost	2	Draft report issued 25/10/2024	
Whistleblowing	2	Draft report issued 26/09/2024	
General Ledger	3	Suggested date: 03/02/2025	
Creditors	3	Field work completed	



System	Planned Quarter	Current Status	Comments
Capital Programme	4	Suggested date: 20/01/2025	
Estates Management – Strategy	4	Suggested date: 17/02/2025	
Follow Up - Interim		Fieldwork completed	
Follow up – Year End		Dates to be agreed	
Contingency	1-4	To be used as required	
Annual Planning	1-4	Revised Draft Issued 30/05/24	
Annual Report	1		
Audit Management	1-4		

KEY:

	To be commenced		Site work commenced		Draft report issued			Final report issued	
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Appendix C: Briefings on Developments in Governance, Risk and Control

TIAA produce regular briefing notes to summarise new developments in Governance, Risk, Control, Counter Fraud and Security Management which may have an impact on our clients. These are shared with clients and made available through our Online Client Portal. A summary list of those briefings issued in the last three months which may be of relevance to Gwent Police is given below:

Summary of recent Client Briefings and Alerts

Date Issued	Sector	Briefing Type	Subject	Website Link	TIAA Comments
16 OCTOBER 2024	ALL	TIAA News	Give a Helping Hand Charity Team Building	Give a Helping Hand Charity Team Building - TIAA	Our Head Office staff recently took part in a team building event, organised by team tactics, which saw them building a number of prosthetic hands destined for individuals in developing countries.
11 OCTOBER 2024	ALL	Newsletter	Security Focus Newsletter Edition 8	Security Focus Newsletter Edition 8 - TIAA	Security and risk management is a key challenge for any organisation, this newsletter contains lots of useful advice and tips to help ensure a safe and secure environment for your staff and visitors. No organisation wants the disruption or bad publicity that incidents of violence and aggression against your staff or crimes against your property create.
07 OCTOBER 2024	ALL	Industry News	Protect Duty Update – (The Terrorism (Protection of Premises Bill)	Protect Duty Update - (The Terrorism (Protection of Premises Bill) - TIAA	An update and key points on the Terrorism (Protection of Premises) Bill.
01 OCTOBER 2024	ALL	TIAA Article	Celebrating Cyber Security Month: Protecting Our Digital World	Celebrating Cyber Security Month: Protecting Our Digital World - TIAA	As we step into Cyber Security Month, it's a perfect time to reflect on the importance of safeguarding our digital lives. In an era where technology is deeply intertwined with our daily activities, understanding and implementing robust cyber security measures is crucial. Find out about the importance of cyber security, getting the basics right and emerging trends.
26 SEPTEMBER 2024	ALL	Anti-Crime Alert	Mandate Fraud Alert	Mandate Fraud Alert - TIAA	A TIAA client has been targeted by fraudsters in an attempted mandate fraud. Read the full details in our alert.





Date Issued	Sector	Briefing Type	Subject	Website Link	TIAA Comments
16 SEPTEMBER 2024	Emergency Services	TIAA Article	Empowering Emergency Services with Comprehensive Business Assurance	Empowering Emergency Services with Comprehensive Business Assurance - TIAA	TIAA's assessment of the current risks in the Emergency Services Sector.
11 SEPTEMBER 2024	ALL	Briefing Note	Authorised Push Payment Scams	Authorised Push Payment Scams - TIAA	An implementation date of 7 October 2024 for Authorised Push Payment scam protection, is confirmed by the Payment Systems Regulator. Authorised Push Payment (APP) fraud is a significant issue and can have a devastating impact on victims. The PSR is taking a leading role in improving outcomes for consumers by introducing new protections for victims of APP scams, while incentivising industry to implement enhanced fraud prevention tools.
09 SEPTEMBER 2024	Education	Data Protection Alert	Schools' usage of children's data	Schools' usage of children's data - TIAA	UK schools are increasingly using social media to engage with communities. However, it is far from clear that using images of children in this way is lawful under the UK GDPR, and there is currently no data protection guidance available from the ICO for schools on social media use. The government has recently published an update regarding this issue, highlighting their planned Digital Information and Smart Data Bill.
03 SEPTEMBER 2024	ALL	Video	TIAA's B Corp Story	TIAA's B Corp Story - TIAA	TIAA is proud to be a certified B Corporation (or B Corp), joining a growing movement of companies that are reinventing business for the benefit of all people and our shared planet. Watch our B Corp Story.





Appendix D: Updates to Global Internal Audit Standards

In January 2024, the Institute of Internal Auditors released the long-awaited changes to the industry's Standards that will have far-reaching impact on the year(s) ahead.

The standards will be adopted by 9th January 2025.

There are some significant changes that will provide internal audit functions with a refreshed framework and clearer requirements.

Key Innovations and Enhancements

Among the significant new requirements include:

- Establishment of an internal audit strategy.
- Heightened governance and oversight by the board and senior management.
- Enhanced reporting including ratings/rankings considerations.
- External quality assessments to be conducted by a team that includes at least one CIA.
- Technology considerations for the internal audit function's evolving needs.

Elevating the mandate and stature of Internal Audit

- Defining internal audit's purpose business stakeholders should understand and be able to articulate the value of internal auditing and the mandate must be included in the internal audit charter.
- Separating independence and objectivity Clear definitions.
- Enhancing stakeholder coordination.
- Building trust Developing an approach to building relationships with key stakeholders and promote effective communication across all stakeholder groups.

Maximising use of Technology

- Enabling technology as a key resource.
- Using technology in audit operations including audit planning, human and technology resource allocation.
- Technology use in audit delivery using technology to test more effectively and efficiently, for example, using applications to test full populations instead of a sample.

Delivering more valuable results





- Promoting continuous improvement responsible for measuring the performance of the internal audit function and ensuring it continuously improves.
- Enhancing and elevating engagement level A formal requirement of engagement reporting, including rating or ranking of audit findings, formulating recommendations, obtaining management's action plans and developing an engagement conclusion.
- Performing external quality assessments (EQAs) The board of directors must review EQA results, and the assessment team must include at least one individual with an active certified internal auditor (CIA) designation.

Structure of standards into 5 domains containing principles and standards. The key domain for Audit Committee members is Domain 3.

- **Domain 1** Purposes of internal auditing and adding value
- **Domain 2** Ethics and professionalism -behavioural expectations.
- Domain 3 Governing the Internal Audit Function (Relationship between IA and Board (Committee) and responsibilities)
- **Domain 4** Managing the Internal Audit function
- **Domain 5** Performing Internal Audit services expectation on engagement

Topical Requirements – such as Cyber / Fraud and Environmental Social Governance (ESG) will have updated standards against which TIAA must audit those topics when they come into the audit plans.

Useful Resource:

Title	
Audit Committee Presentation (IIA-UK)	CIIA%20-%20Audit% 20Comm ittee-presen
Audit Committee Check List (IIA-UK)	CIIA-Au dit%20Comm itte <i>e</i> %20Annual%20A
IIA-UK Fact Sheet	code-of-practice-doc ument_september202

