

**NORTHERN IRELAND POLICING BOARD**

**MINUTES OF MEETING OF AUDIT AND RISK ASSURANCE COMMITTEE HELD  
ON WEDNESDAY 16 MARCH 2022 AT 2PM AT THE NORTHERN IRELAND  
POLICING BOARD WATERSIDE TOWER, BELFAST AND VIA ZOOM**

**PRESENT:**

**MEMBERS**

Mr Colm McKenna (Chair)\*  
Mr Edgar Jardine (Vice-Chair)  
Mr Michael Atkinson\*  
Mr Frank McManus\*  
Mrs Carmel McKinney\*  
Mr Gerry Kelly MLA

**IN ATTENDANCE:**

**DEPARTMENT OF JUSTICE**

Mrs Sharan Dustagheer\*

**INTERNAL AUDIT**

Mrs Cathy Hadden\*

**NORTHERN IRELAND AUDIT  
OFFICE**

Mr Gary Currie\*

**ASM ACCOUNTANTS**

Mrs Christine Hagan\*

**OFFICIALS**

Mrs Sinead Simpson, Chief Executive  
Ms Jenny Passmore, Director of  
Resources

Three Board Officials

\*Attended the meeting via video conference.

**1. APOLOGIES**

Apologies were received from Mr Trevor Clarke MLA, Mr Michael Matthews,  
Mr Tomas Wilkinson and Ms Fiona Scullion.

## 2. CONFLICTS OF INTEREST

No conflicts of interest were declared and the Agenda was agreed.

No Member raised any matters for discussion under 'Any Other Business'.

## 3. DRAFT MINUTES OF THE MEETING HELD ON 9 DECEMBER 2021

The Vice-Chair referred to Page 5, Item 7 Corporate Risk Register and the sentence "During discussion it was noted that the residual score of certain risks, due to the very nature of them would always remain a major risk, regardless of the mitigations in place". The Vice-Chair suggested that the word "major" be removed – this amendment was **AGREED** by all.

The minutes of the meeting of 9 December 2021 were **AGREED** subject to this change being made.

## 4. COMMITTEE ACTION LOG

The Chief Executive noted that there were no new actions arising from the meeting on 9 December 2021 and suggested that the 2 actions from the meeting on 30 September 2021 could now be closed as both were discussed at the December meeting and no further action was required. Members agreed to close these actions.

## 5 CHAIRPERSON'S BUSINESS

The Chair noted he had no items of Chair's business to report.

## 6. VERBAL UPDATE – PSNI'S ARAC MEETING ON 25 JANUARY 2022

The Chief Executive provided an update on key issues from the PSNI ARAC

meeting on 25 January 2022. The Chief Executive advised that she had an introductory meeting with the Chair of PSNI ARAC in advance of this meeting who indicated he is keen for her to be a regular attendee at the PSNI ARAC meetings. The PSNI ARAC Chair advised that although the Chief Executive is attending in an observation role he encouraged her to participate in the discussions. The Chief Executive advised the Chair of the PSNI ARAC suggested a joint workshop between themselves and this Committee at the appropriate time and she gave an overview of the issues discussed at the meeting such as ongoing and completed audit reports, corporate governance arrangements, the continuous improvement agenda, raising concerns/whistleblowing, key service risks including holiday pay, budget and consequent pause on recruitment and impact this would have on objectives around representativeness and issues which can enhance service performance including the new SET, the new PULSE performance management tool and developments on cyber security and technology.

A Member noted a caution around the observation role of the Chief Executive morphing into one where the views of the Board were expected, including on issues which the Board had not discussed, and a similar note of caution re the NIPB ARAC Chair's level of involvement and participation in PSNI's meetings.

In this context Members agreed to give further consideration to the merits of future workshops between the ARACs of the two organisations.

A Member asked if the issue regarding PSNI Professional Standards and Discipline/Code of Conduct was included on the PSNI Risk Register – the Chief Executive advised she would check the meeting papers and revert to the member. **(AP1)**

## **7. NIPB INTERNAL AUDIT**

### **7.1 NIPB Internal Audit Progress Report**

The Internal Audit Manager presented a paper which noted that since the previous meeting in December 2021 two final reports from the 2021/22 Internal Audit Plan had been issued. These were in respect of Police Pensions and Internal Dispute Resolution Procedures and Information Security and Management. Both audits were awarded a '**Satisfactory**' rating and both also received two Priority 2 recommendations.

The Internal Audit Manager noted that one further assignment, in relation to the Police Property Fund commenced on 14 February 2022 and fieldwork is currently ongoing. The Internal Audit Manager advised that after discussion with the Chief Executive it was agreed to enhance the scope of this audit and as such the numbers of days allocated to it had increased to 10 from the 2 previously allocated. In response to a Member's query the Chief Executive explained that as this is a new area of the business there would be greater value in having a broader scope for the audit, to ensure the appropriate governance mechanisms and controls were in place from the beginning and ultimately reduce the risk of any reputational damage at a later date.

The Internal Audit Manager also advised that following consultation with the Chief Executive it was agreed to defer the previously planned PCSP audit to the 2022\23 financial year. The 15 days allocated to this have been returned and it was agreed to revise the overall total allocation for 2021/22 from 40 days to 30 days, with an additional 5 days held in contingency should they be needed. The Internal Audit Manager confirmed that the Head of Internal Audit is content that there is sufficient internal audit coverage to allow him to provide his annual audit opinion at year end.

A Member raised a query in relation to the Board's Retention and Disposal schedule which was included in an Internal Audit review of Freedom of Information (FOI) and GDPR in the 2020/21 financial year and asked for clarification on the process. The Chief Executive explained the process for the

development and implementation of the Retention and Disposal schedule and the Member requested a copy of the Records Management handbook/best practice guidance – Chief Executive to provide to the Member. **(AP2)** The Member also asked if the PSNI's Retention and Disposal schedule followed the same process – Chief Executive to check and confirm. **(AP3)**

## **7.2 Internal Audit Open Recommendations**

The Chief Executive presented a paper which provided Members with an update on the progress taken to implement open internal audit recommendations.

The Chief Executive noted there are currently nine open recommendations. Of these nine recommendations, two are partially achieved.

Three recommendations arising from the Business Continuity Planning (BCP) Review continue to be progressed. Board officials are scheduled to meet at the end of March/April 2022 to take stock of progress to date and consider next steps. Engagement has also taken place with partner agencies in respect of methodologies for the future testing of the updated BCP. The development of a new James House BCP has also been added as an action to our internal James House Project Work Breakdown Schedule (WBS).

In relation to the recommendation regarding the backlog of FOI requests the Chief Executive noted that in the week since these papers were issued the number of outstanding cases has reduced, albeit the final sign off on replies awaits clearance by the Compliance Officer. The Compliance Officer continues to monitor the total number of outstanding FOI requests and reports to SMT on a monthly basis. The Chief Executive advised that SMT are endeavouring, within budget constraints, to add resource to this area of the business, even if only for a short period.

The Chief Executive advised that in relation to the open recommendation from 2016/17 regarding the Senior Officer Discipline Policy this has been progressed as far as Board officials can; we now need to seek independent qualified assistance from someone specialised in misconduct hearings before the draft policy is forwarded to Crown Solicitors Office (CSO). (AP4)

In response to a Members' question regarding the 2 security breaches reported within the last 12 months, the Chief Executive explained that 1 was an internal administrative error relating to the use of an incorrect email address, and the other related to a staff medical certificate that went to PSNI in error instead of HR Connect. The Chief Executive reassured Members that Board officials have reviewed and updated the internal processes to mitigate any risk of a reoccurrence.

A Member also requested that the format of this report be updated going forward to include the date that each audit was undertaken. (AP5)

### **7.3 NIPB Audit Plan for 2022/23**

The Internal Audit Manager presented a paper outlining the NIPB proposed Internal Audit work plan for 2022/23. The Internal Audit Manager advised that in consultation with the Chief Executive and ARAC Chair, in compiling this plan they have considered the results of Internal Audit work completed to date in the previous 3 financial years, any new or emerging risks, areas where previous audit coverage highlighted issues; the audit resources available and any key risk areas identified by management on the corporate and directorate level risk registers.

The Internal Audit Manager noted that areas for the Audit Plan for 2022-23 included assurance work on PCSPs, including follow up to fact finding review of Belfast PCSPs and any other emerging issues; assurance work on the Board's complaints handling process, and process for dealing with complaints

about Board Members; and advisory work in relation to corporate governance. The Internal Audit Manager advised that this work plan indicates a resource requirement of 35 days. This plan will be reviewed on a quarterly basis in conjunction with the quarterly updates to the risk registers and discussions with Senior Management.

The Chair raised a query regarding the possibility of considering a 3 year audit strategy. The Internal Audit Manager advised that due to the uncertainty around Covid-19 restrictions/implications and with the Chief Executive's agreement, at this time Internal Audit are working on 1 year plans only. The Chief Executive added that a 3 year strategy could potentially be considered at the beginning of the 2023\24 financial year.

After discussion Members **AGREED** to approve the draft work plan for 2022/23.

## **8. EXTERNAL AUDIT**

### **8.1 NIAO Strategy for NIPB External Audit 2022/23**

The Director from ASM Accountants presented a paper which briefed Members in relation to the NIAO Audit Strategy for the certification of the Board's Annual Report and Accounts for the year ended 31 March 2022. The audit strategy detailed the NIAO approach to the audit, the roles and responsibilities of Board and Audit staff, the cost of the audit, associated risks, and also a detailed audit project plan which included a proposed commencement date of 16 May 2022. Members were advised that The Annual Report and Financial Statements had to be laid in the Assembly before 8 July 2022 when summer recess will commence. Members **NOTED** the timetable but during discussion, explained that these timescales will be subject to the re-constitution of the Board following the NI Assembly elections in May 2022 but will endeavour to meet the deadlines if possible.

The ASM Accountant Director highlighted the section at the bottom of page 1 of Appendix A regarding ARAC Members responsibilities and considerations and asked if any Member had anything they would like to raise – all Members confirmed they had no issues to raise.

## 9. NIPB CORPORATE RISK REGISTER

The Chief Executive presented the Corporate Risk Register (CRR) and advised this is reviewed by the senior management team (SMT) at regular intervals and was last reviewed at length in February 2022. The total number of Corporate Risks is seven and the Chief Executive advised that SMT were of the view that these risks still remained valid. The Chief Executive noted that SMT added some additional mitigating actions in respect of the risks, and concluded that there were no new risks to be added to the register at this stage.

The Chief Executive noted that the change that Members requested and agreed with regard to Risk 4 relating to the Independent Medical Referee Process had been made (as outlined in bold in the CRR) to clearly articulate the cause of the risk.

The Chief Executive advised that it is SMT's intention to carry the current Risk Register over into 2022\23 and keep it under review at SMT.

Members discussed the inherent and residual scores in relation to Risk 4 and whilst they accepted that the residual score of certain risks, due to the very nature of them would mean they would always remain a risk, regardless of the mitigations in place, requested that consideration be given to reviewing and updating the mitigating actions regarding Risk 4, with the possible introduction of a "target" risk score. **(AP6)**



Members also asked Senior Management to give consideration to the presentation of the Risk Register, in particular with regard to a summary sheet highlighting the inherent and residual risk scores and any movement on each.

**(AP7)**

The Chief Executive also noted that SMT will be considering holding an annual risk workshop and additional focus will be brought to this at the internal Corporate Management Group meetings going forward.

#### **10. NIPB COMPLAINTS UPDATE**

The Chief Executive advised Members that no further Complaints had been received since the last update to the Committee in December 2021. However, Members were advised that the one complaint previously noted at the December Committee which was received in August 2021, had progressed to Stage 2 of the Complaints Handling Policy in January 2022.

In line with that process, the complaint was assigned to a Senior Board Official, the Director of Partnership, for consideration. Following further detailed review by the Director of Partnership, a response was issued to the complainant's representative in which she concurred with the outcome of Stage 1 and did not uphold the complaint. This response was issued on 22 February 2022 (within the 20 day timeframe detailed in our Complaint's Policy). This remains the only complaint processed under the Board's Complaints Policy during the 2021-2022 period.

#### **11. NIPB GIFTS AND HOSPITALITY REGISTER**

This item is considered quarterly. Members were asked on 9 February 2022 to advise the updated position regarding Gifts and Hospitality and to date Members have reverted with a nil return. A further update will be requested next quarter.

**12. NIPB DIRECT AWARD CONTRACTS**

Officials noted that there were no new Direct Award Contracts (DACs) to report to the Committee. A DAC reported to the Committee in September 2020 remained in place.

**13. COMMUNICATION ISSUES/ OPPORTUNITIES**

No communication issues were raised.

**14. ANY OTHER BUSINESS**

No other business was conducted.

**15. DATE OF NEXT MEETING**

The next meeting will be confirmed following the Assembly elections in May 2022.

(Meeting closed at 15.40)

**CORPORATE SERVICES**

**Date: March 2022**