

**NORTHERN IRELAND POLICING BOARD**

**MINUTES OF MEETING OF AUDIT AND RISK ASSURANCE COMMITTEE HELD  
ON THURSDAY 6 OCTOBER 2022 AT 2.30PM 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  
Mr Maurice Bradley MLA  
Ms Liz Kimmins MLA  
Ms Nuala McAllister MLA

**IN ATTENDANCE:**

**DEPARTMENT OF JUSTICE**

Mrs Sharan Dustagheer

**INTERNAL AUDIT**

Mr Michael Matthews  
Mrs Cathy Hadden

**NORTHERN IRELAND AUDIT  
OFFICE**

Mr Gary Currie\*

**ASM ACCOUNTANTS**

Mrs Judith Shortall\*

**OFFICIALS**

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

Two Board Officials

\*Attended the meeting via video conference.

**1. APOLOGIES**

Apologies were received from Mr Tomas Wilkinson, NIAO and Mr Michael McKavanagh, PSNI.

## 2. CONFLICTS OF INTEREST

No conflicts of interest were declared and the agenda for the meeting was agreed.

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

## 3. DRAFT MINUTES OF THE ARAC MEETINGS HELD ON 17 JUNE 2022 AND 28 JUNE 2022

It was **RESOLVED**:-

- That the minutes of the ARAC meetings held on 17 June 2022 and 28 June 2022 be approved.

## 4. COMMITTEE ACTION LOG

The Committee noted the updates detailed within the Action Log and the related verbal overview provided by the Director of Resources in relation to the actions from the meeting on 17 June 2022.

### **Action Point 1**

The Director of Resources noted that following a request at the previous meeting in June 2022 the Committee Terms of Reference had been updated to include a strategic objective, which had been highlighted in the meeting papers. The Committee confirmed they were content with this addition and **APPROVED** the Terms of Reference.

### **Action Point 2**

The Director of Resources advised that the Board's anticipated carbon emission once the relocation to James House takes place will be 30.97Mwh which is significantly lower than the current figure in Waterside Tower of

217Mwh.

### **Action Point 3**

The Chief Executive advised that the promotion of the Annual Report and Accounts is part of a broader communications plan which highlights key areas of Board business and work. The Chief Executive noted the following plans to highlight the Annual Report and Accounts:

- Article in Policing Matters on report publication with outcomes infographic (distributed to 700 registered stakeholders)
- Video of Chair outlining report content for use with social media
- Series of social media posts to facebook and twitter highlighting aspects from the report and Chair's foreword
- News release /publication onto Board website homepage
- Forwarded to NI Assembly Library for distribution to MLAs as part of laying
- Letters to the Chief Constable / Minister of Justice for dissemination within PSNI / DOJ.

### **Action Point 4**

The Director of Resources advised that with regard to Injury On Duty (IOD) provision for historic cases a project will be commenced to review the existing provision list and make improvements.

### **Action Point 6**

The Director of Resources advised that the Police Pension and Injury Benefit team have met the Independent Medical Referee (IMR) and have also delivered an information presentation on all the processes. In general, IMRs who undertake Selected Medical Practitioners' (SMP) work attend ongoing forums and information sharing with Board Officials to build up their knowledge.

It was agreed that Action Points 5,7, 8 and 9 may be closed.

## **5. CHAIRPERSON'S BUSINESS**

The Chair noted he had 5 items of Chair's business to report.

### **5.1 Police Pension Board Chair's Annual Report**

The Chair asked Members to note the Police Pension Board Chair's Annual Report which was issued to ARAC Members by Board Officials on 31 August 2022.

Members **NOTED** the report.

### **5.2 Departmental ARAC Meeting**

The Chair advised that at the Q & A session with DoJ after the Board meeting on 7 July 2022 he had commented on the importance of the tripartite accountability arrangements between the DoJ/PSNI and NIPB. Following this exchange senior DOJ officials spoke with the Permanent Secretary and concluded that it would be disproportionate to have NIPB/PSNI attend all DoJ ARAC meetings. However, they believe it would be helpful to have NIPB/PSNI attend annually and on occasions where specific agenda items are relevant. It has also been agreed that the Department will seek to reinstate a meeting between the Chair of DoJ's ARAC and ARAC Chairs from other internal Agencies and Arms Length Bodies (ALBs), this will be arranged via the relevant Directorate within the Department. In response to a Members' question the Chair confirmed that DoJ does have a risk register which was separate to the Boards, however the Board needed to be cognizant of and understand where we as an ALB fit into the wider Justice family..

### **5.3 PSNI Risk Register**

The Chair updated Members on a discussion he had with the Chief Executive and the Director of Resources regarding the PSNI Risk Register and items which are on it that require further scrutiny by the Board, most likely by a Committee other than ARAC. These include risks around mandatory training, records management, crime recording, custody healthcare, PSNI internal governance and escalation issues. The Chair asked Members if they were content for these issues to be referred to the appropriate Committees of the Board to ensure oversight of these risks – Members **AGREED** and confirmed they were content with this approach. Committee Chair to liaise with Chief Executive and Director of Resources to take forward. **(AP1)**

#### **5.4 Government Internal Audit Agency Training**

The Chair referred Members to the email issued to all ARAC Members from the Department of Justice (DoJ) on 12 September 2022 inviting them to attend Government Internal Audit Agency Training on various dates in 2022 and 2023 and encouraged all Members to avail of the selection of courses on offer.

#### **5.5 New Board Member Training**

The Chief Executive advised that the Board Senior Management Team had been considering training (refresher and otherwise) for new Board Members. The Chief Executive explained that due to the current recruitment competition ongoing for new Independent Board Members to replace those whose term is coming to an end over the next several months, and also as a result of the current political situation and the likelihood of new political Members being appointed to the Board over the next few months, it has been decided to defer this training until the new year and progress it once any changes to Board Membership have been finalised. Members confirmed they were content with this approach.

## **6. VERBAL UPDATE OF THE PSNI ARAC MEETINGS HELD ON 29 JUNE 2022 AND 27 SEPTEMBER 2022**

The Chief Executive provided an update on key issues from the PSNI ARAC meetings on 29 June 2022 and 27 September 2022.

In respect of the meeting on 27 September 2022 the Chief Executive gave an overview of the issues discussed at the meeting which included:

- Scrutiny of retention and disposal schedules and some particular issues around fully implementing the retention and disposal arrangements for soft copy papers.
- Internal Audit plans for the coming year, including the number of planned audits and that a significant proportion had yet to commence. Members noted that discussion had taken place on what could be done in future years to mitigate any slippage in timeframes for completion but acknowledged the assurances given by IA that sufficient audits would be completed to give ARAC and the Accounting Officer the required assurances.
- Discussion around governance arrangements for Professional Standards Department (PSD)
- An update in respect of the PSNI Corporate Risk Register, including the de-escalation of the information risk and data quality, and the increasing impacts of the residual risk in year from the funding situation; PSNI ARAC were also advised that there are no specialist firearms officers without requisite licensed training.
- Scrutiny of the custody healthcare arrangements and the challenges faced in delivering the current system concurrently with a transformation programme.
- Significant discussion on the funding/budget position and the recognition that if this issue is not addressed soon, there will be significant risks starting to emerge which PSNI ARAC should be

sighted on.

- Work taken forward by Internal Audit in respect of governance arrangements in PSNI. The November PSNI ARAC will receive a further update on this.

With regard to the meeting on 29 June 2022 the Chief Executive advised that key issues included many of those noted above in the September report, including impact of the budget situation on service delivery and where risks might emerge, deliverability of the audit programme, delay in GAD updating their valuations and the impact this had on annual report and accounts and how it would impact in the future. At that meeting there was also scrutiny on the Professional Standards Department issues, similar to various briefings provided to Members over recent months.

## **7. NIPB INTERNAL AUDIT**

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

The Head of Internal Audit presented a paper which noted that since the previous meeting in June 2022 one final report from the 2022/23 Internal Audit Plan had been issued. This was in respect of Mid & East Antrim (MEA) PCSP 2020\21 & 2021\22 Funding Verification Exercise. The overarching purpose of this review was to provide assurance to the NIPB (and Joint Committee) on the adequacy and effectiveness of MEA's administration and management of the MEA PCSP for the 2020/2021 and 2021/2022 financial years.

The Head of Internal Audit advised the audit identified a number of issues, the most significant of these relating to a lack of detailed breakdown maintained of costs claimed, including details of how these costs were determined, resulting in difficulties in verifying aspects of expenditure claimed for either 2020/2021 or 2021/2022. As a result of the audit, four Priority 2 recommendations, one Priority 3 recommendation and two Best Practice recommendations were identified. In response to a question from a Member the Chief Executive noted

that Board Officials will seek the necessary assurances from MEA on the implementation of the recommendations. Members raised concerns regarding the possibility that this could be the case across other PCSPs also, however the Chief Executive advised that this work is the responsibility of each council Chief Executive to manage, and arrangements are in place which allow for robust monitoring and added that the PCSP's are audited on a regular/annual basis – Chief Executive to check and confirm frequency. **(AP2)**

The Head of Internal Audit advised there are two further assignments on the 2022/2023 Internal Audit Plan, Complaints, an assurance review and Corporate Governance, an advisory review. The contingency/consultancy is intended to cover any additional audit work that may arise in year. A meeting is scheduled with the Chief Executive next week to discuss the timing and scope of the remaining assignments on the Internal Audit Plan and also the remaining days allocated to contingency/consultancy.

A Member raised concerns regarding the number of audits to be undertaken in this year's plan, the number of days in totality of the plan and also the ratio of the split of the remaining days in this year's audit plan against the two areas outlined above – Complaints and Corporate Governance and commented that in their opinion the ratio was disproportionate. The Chief Executive explained that over the past several years the majority of high risk areas have already been subject to an audit and there have been no major discrepancies found as a result. Board officials to issue the schedule of audits undertaken over the past few years so that current Committee Members can see what business areas have been covered. **(AP3)**

The Chief Executive confirmed that a conscious decision was made to reduce the number of days in the audit plan from 40 to 35, however if that is deemed to be insufficient we can revert back to 40 days if necessary. The Chief Executive advised she will discuss and review the number of days in the audit plan, and how to utilise these days to best effect with the Head of Internal



Audit at their meeting next week.

## **7.2 Internal Audit Open Recommendations**

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

The Director of Resources noted there are currently fifteen open recommendations. Of these fifteen, 7 recommendations are as a result of recently completed audit in respect of Mid & East Antrim (MEA) PCSP 2020\21 & 2021\22 Funding Verification Exercise as referenced in item 7.1 above.

The Director of Resources noted a recommendation from the 2021 Audit of FOI and GDPR is in relation to the backlog of FOI requests. Since then, the position with processing FOI/GPDR requests has been kept under review by the Senior Management Team with the Chief Executive providing regular updates to the Board. At the 1 September 2022 Board Meeting, Members were advised that the backlog has now been cleared and that resourcing issues associated with processing of requests has been addressed and as a result this recommendation has now been closed. As of 7 September 2022 work is ongoing to progress a total of 3 FOI requests (all received within the last 3 months).

Work is ongoing on the implementation of 2 recommendations arising from an audit on Information Management and Security in March 2022, in particular with regard to the Retention and Disposal Policy and Schedule and the updating of the Records Management Policy and associated Handbook and three recommendations arising from the Business Continuity Planning (BCP) Review continue to be progressed.

The Director of Resources acknowledged that there are still 2 recommendations open from 2016/17 and from 2019/20 which have been delayed due to resourcing difficulties and need to be fully implemented as soon as possible. The Chair commented he would be keen to see these older recommendations closed as soon as possible.

## **8 EXTERNAL AUDIT**

### **8.1 Final Report to those charged with Governance**

The Committee noted the Final Report to Those Charged with Governance in relation to the Annual Report and Financial Statements for the year ended 31 March 2022.

External Audit Representatives provided an overview of the Final Report noting that it proposed an unqualified audit opinion without modification. A representative from the NI Audit Office advised the Committee that the Comptroller & Auditor General had certified the Board's Annual Report and Accounts on 4 August 2022 and they were laid before the NI Assembly on 11 August 2022.

## **9. NIPB CORPORATE RISK REGISTER**

The Director of Resources 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 September 2022. The total number of Corporate Risks is six. No new risks have been added to the register since the previous meeting in June 2022. The Director of Resources advised that following consideration at the meeting on 7 September 2022 SMT were of the view that Risk 6 relating to the FOI/GDPR Backlog which was added to the register in September 2021, could now be de-escalated to the Partnership Directorate Risk Register given that the backlog has been cleared

and that resourcing issues associated with processing of requests have been addressed. Members **AGREED** they were content for this to be de-escalated and the Director of Resources will liaise with the Director of Partnership to update the Corporate Risk Register. **(AP4)**

Members also **NOTED** the Police Pension Board Risk Register.

A Member raised concerns regarding how effective the mitigations in respect of Risk 1 “PSNI’s Actions on the Policing Board Reputation” were. The Chief Executive acknowledged the importance of the relationships and communication between the Board and PSNI representatives and noted that whilst there have been developments in this regard there are still areas that could be improved upon. The Chair noted that this may well be a risk where the residual score will always remain an Amber or Red rating.

#### **10. ACCOUNTING OFFICER BI-ANNUAL STEWARDSHIP STATEMENT 2022/2023**

Members **NOTED** the Chief Executive’s Mid Year Stewardship Statement for the period 01 April 2022 to 30 September 2022 which was submitted to the DoJ earlier this week.

#### **11. NIPB COMPLAINTS UPDATE**

The Director of Resources provided the Committee with an update on the position of a complaint which was recently dealt with by the Board. The Director of Resources advised at the June 2022 meeting of the Committee one complaint was being progressed under our Complaints Policy. The Director of Resources advised that, following repeated requests to the complainant seeking further information to allow us to investigate the complaint, no further information was provided. The complainant was advised in July 2022 that should the requested information not be received within 21

days we would, in line with the Board's policy, move to discontinue the complaint. No additional information was received and therefore on 4 August 2022 correspondence was issued advising that the complaint had been discontinued.

The Director of Resources confirmed there are currently no other complaints being progressed under the Board's complaints policy.

The Chief Executive added that with regard to the planned Internal Audit of the Complaints Handling process scheduled for later this year, this audit will also cover the Complaints against Board Members policy.

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

The Chair noted that in the period 01 July 2022 to 30 September 2022 there were no Gifts or Hospitality to report.

## **13. COMMUNICATIONS ISSUES**

None.

## **14. ANY OTHER BUSINESS**

None.

## **15. DATE OF NEXT MEETING**

The next meeting will take place on Tuesday 20 December 2022 at 2pm.

(Meeting closed at 15.30)

## **CORPORATE SERVICES**

**Date: October 2022**

**Chair**