Police and Crime Commissioner Cumbria and Cumbria Constabulary

Assurance Review of Absence Management

2023/24

November 2023

Executive Summary

OVERALL ASSESSMENT

REASONABLE ASSURANCE

- SUBSTANTIAL ASSURANCE
- REASONABLE ASSURANCE
- LIMITED ASSURANCE
- NO ASSURANCE

ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

As at 31st March 2023, there were 5,113 full-time equivalent (FTE) police officers on long-term absence in the 43 forces in England and Wales (equivalent to 3.5% of all officers).

SCOPE

The review considered the arrangements for: recording, reporting and monitoring absence. The scope of the review also considered the arrangements to promote wellbeing and reduce absence.

KEY STRATEGIC FINDINGS

The process is directed by a number of appropriate and up-to-date policies.

Training and support have been provided to line managers by the Human Resources team.

Testing showed that review meetings with staff are not regularly conducted on a consistent basis.

No risks have been identified in relation to absence management.

GOOD PRACTICE IDENTIFIED

Regular performance reports are presented to Workforce Bronze and Workforce Gold.

Support and wellbeing information is made available to staff via a dedicated section on the staff intranet.

ACTION POINTS

Urgent	Important	Routine	Operational
0	2	1	0

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
1	Directed	The Temporary Chief Superintendent confirmed that there are no strategic risks recorded in relation to absence management. Although it is acknowledged that absence levels at the Constabulary are below national averages, and therefore this may not be considered a major concern and strategic risk, operational risks should be recorded, particularly in relation to the completion of review meetings, and mitigating controls identified.	Risk(s) relating to staff absence be recorded and mitigating controls identified.	2	S – Add operational risk to the risk register regarding completion of informal review meetings M – Check risk register A – Add to the register R – Managers should be adhering to the attendance support processes to ensure the Constabulary is supporting staff during absences, contributing to overall welfare, wellbeing, and retention of people in the workplace who are able to perform their role T – With immediate effect	With immediate effect	D Johnson HR Manager
2	Directed	A series of meetings were undertaken with Senior HR Advisors and HR Advisors to review a sample of cases of staff members who had been, or were currently, on sickness absence. The intention was to establish what actions had been taken by line managers and members of the HR Team in relation to the completion of review meetings, Stage 1 meetings, where applicable, and what support and advice had been offered to staff. The sample of 17 cases identified seven where informal review meetings (IRMs) had	Line managers be reminded of the importance of completing informal review meetings in the early stages of staff absence and at regular intervals thereafter.	2	S – Ensure attendance support processes are adhered to in relation to conducting timely informal review meetings This is as per the attendance support processes and clearly defined within the attendance policy M – Senior HR Advisors work with managers in their Command on individual cases and can track completion of IRMs.	With immediate effect	Di Johnson HR Manager

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.	2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.	3	ROUTINE	Control issue on which action should be taken.

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
		not been undertaken in a timely manner following commencement of the sick leave, or long periods were noted between the meetings. This also included one IRM that was undertaken after the employee had returned to work. These meetings are important as they set out what activities should be taken by the member of staff and by the Constabulary, and set timescales for a return to work or additional actions to be undertaken.			*IRMs are required for everyone who is long term absent, all managers receive an email from HR advising re the process and has a link to the IRM form* *If managers are not progressing IRMs timely, these are flagged to closed work force silver and will be discussed at weekly HR checkpoint meetings with Senior HRA.* *This part of the attendance process is covered in management training.* *Work is being undertaken in relation to using a Microsoft form as the IRM template which will provide better management information to track compliance.* *Absence data and compliance of processes will feature in future Performance Development Conferences for each Command, these are strategic inspection meetings chaired by the DCC.* *A – The IRM is part of the attendance process and guidance is provided to managers regarding completion and the reasons for conducting these meetings* *A message will be circulated to all work force bronze meetings as a reminder regarding this part of the process*		

PRIORITY GRADINGS

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Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
					Forms part of attendance support training to mangers within the Leadership Development Courses and bespoke training to specific departments ie: CCR. Additional inputs and training can be arranged if required for specific departments.		
					R – An individual's wellbeing is important, and managers should offer the right support to enable people to attend work and be properly supported. An individual's manager is key in putting this support in place.		
					The IRM is a process to ensure this support is considered and put in place, as well as providing the ability to progress through the formal support process.		
					The current IRM form has lots of relevant information and signposting to different support.		
					T – With immediate effect		
3	Directed	It was noted that, in the sample tested, there were two members of staff where returned to work dates had been recorded within the Crown system, however it was established that they remained off sick. It is likely that the return-to-work date recorded was an anticipated return date and not an actual return date.	It be ensured that only actual return to work dates are recorded in this field within Crown Duties.	3	*S – Ensure managers understand their responsibility regarding updating absences on CROWN DMS.* *This forms part of attendance support training.* *M – Accurate recording on CROWN DMS for absent staff.*	*Completed*	*Di johnson* *HR Manager*

PRIORITY GRADINGS

1	**URGENT**	Fundamental control issue on which action should be taken immediately.		**2**	**IMPORTANT**	Control issue on which action should be taken at the earliest opportunity.	**3**	**ROUTINE**	Control issue on which action should be taken.

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
					The Attendance Support SharePoint page provides a link to the managers CROWN guidance.		
					HR send weekly emails to managers if a return-to-work interview has not been completed. This email also contains a link to the managers CROWN guidance regarding how to update a period of absence if the individual is still absent. This has been in place for several weeks.		
					A – Guidance provided to managers		
					Guidance is available and signposted to managers. Resource Co-ordination are commencing CROWN master classes mid-October covering different aspects of the system, including absence management.		
					R – Managers are responsible for accurately recording absences to ensure the correct support can be put in place for individuals and the establishment figures for deployable and non-deployable are correct		
					T – Ongoing		
					This issue was raised as part of the RTWI process and guidance was put in place immediately.		

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.	2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.	3	ROUTINE	Control issue on which action should be taken.

Operational - Effectiveness Matter (OEM) Action Plan

Ref	Risk Area	Finding	Suggested Action	Management Comments	
No operational effectiveness matters were identified.					

Operational Effectiveness Matters need to be considered as part of management review of procedures.

Assignment Engagement Details

TIAA Auditors	Title	Contact Email	Telephone
Andrew McCulloch	Director of Audit	Andrew.McCulloch@tiaa.co.uk	07980787926
David Robinson	Audit Manager	David.Robinson@tiaa.co.uk	07766553339

Constabulary Staff	Title
Diane Johnson	HR Manager
Emma Chalmers	Senior HR Advisor
Shannon Parker	Senior HR Advisor
Jessica Pepper	HR Advisor
Kara Neeson	HR Advisor
Gillian McEwan	Senior HR Advisor

Exit Meeting Date	5th September 2023
Attendees	Diane Johnson, HR Manager

Director/Commander Comment	I am pleased to note that this review of Absence Management within the Constabulary has resulted in an overall assessment of reasonable assurance which I feel is fair reflection of the overall position.
	The audit recognises that processes and policies are up to date and that training for managers is provided alongside robust reporting the Workforce structures.
	The review did observe that review meetings with staff are not conducted on a consistent basis with the recommendations to address being agreed and progressed by HR Management. HR have now introduced fortnightly checkpoint meetings to review and manage progress of the informal review processes.

	In summary, the Constabulary will action the recommendations made within this review in order to build on the good work already in place which is evidenced by the continued low level of absences experienced.
	Stephen Kirkpatrick – Director of Corporate Support
Deputy Chief Constable's Comments	I have read this report and the comments from Stephen above and I am encouraged to see that actions raised are being addressed. Activity in relation to return to work interviews and processes will see an increase in focus as current levels of compliance within the Constabulary are unacceptable. A piece of work has been tasked to the Chief Superintendent (Westmorland & Furness Command) and this will be closely monitored through the monthly Workforce Board meetings. DCC Darren Martland
Considered for Risk Escalation	No

Findings

Directed Risk:

Failure to properly direct the service to ensure compliance with the requirements of the organisation.

Ref	Expected Key Risk Mitigation		Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework	There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.	In place	-	-
RM	Risk Mitigation	The documented process aligns with the mitigating arrangements set out in the corporate risk register.	Not in place	1	-
C	Compliance	Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	Partially in place	2, & 3	-

Other Findings

The overarching document in relation to absence management is the Constabulary's Police Staff Attendance Capability Policy and Procedure. This was approved by the Operations Board in September 2021 and was last reviewed in October 2022. This covers the processes involved in the formal stage one and two reviews, hearings, dismissals and appeals and capability on health grounds. A flowchart provides guidance in relation to the various steps to be taken, including where these differ for police officers and other staff.

There are a number of supporting documents to the Policy, which include the Attendance Support Policy and Procedure (February 2023), Flexible Working Policy and Procedure (February 2023), Leave Policy and Procedure (June 2023) and the Limited Duties for Police Officers Policy and Procedure (July 2021).

Furthermore, the Constabulary People Strategy 2022-2025 includes details of absence data for 2018 onwards, engagement activities in place aimed at reducing long-term and stress related absences and the 2022-2025 Future Plan to analyse sickness, to identify trend and engage with business leads to identify and implement proactive interventions aimed at reducing absence.

Other Findings

The Attendance Support Policy and staff member's Terms and Conditions inform staff that they should report all periods of absence to their line manager who subsequently enter this into the Crown Duties system. This in turn feeds into the iTrent payroll system to ensure that the correct sick pay is paid. Documented guidance has been provided in relation to how to place an individual on sick leave, the requirement to complete regular reviews and a return to work note with the member of staff, uploading fit notes and updating the expected return to work date.

The Human Resources team generate daily sickness report from Crown Duties in order to identify periods of long-term absence (where a trigger has been hit or a period of 28 days or more). They send out a template email to the relevant line manager to instruct them to review the absence with the member of staff. A standard Informal Review Meeting (IRM) form is completed. These record any updates from the member of staff on the absence, underlying reasons for absences, previous actions / supportive measures put in place, how improvements can be made or ongoing support provided and details of the agreed outcomes. The expiry date of the current fit note and return to work or next review date are also recorded.

Each Senior Human Resources (HR) Advisor has a portfolio area and they, supported by the Human Resources Assistants, are responsible for monitoring the review dates and requesting line managers to complete the next steps. Case files are set up for each employee on the shared G drive, which is accessible only by members of the HR team and all cases are logged on a tracker spreadsheet.

All relevant staff have received training from the Senior HR Advisors. This included the management of long-term sickness, sick/fit notes, the consideration of temporary recuperative duties and the completion and agreement of Fair Passports, which are a record of agreed long term reasonable adjustments. In early 2023, specific training sessions were also provided to managers and supervisors and to sergeants. These covered: the attendance support process; different leave types and support mechanisms; the requirements of the flexible working process; and managing performance.

Delivery Risk:

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation		Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
PM	Performance Monitoring	There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.	In place	-	-
S	Sustainability	The impact on the organisation's sustainability agenda has been considered.	Out of scope	-	-
R	Resilience	Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.	In place	-	-

Other Findings

A significant volume of absence related data is reported to various groups, which include the Workforce Bronze, who meet fortnightly and include senior managers and the Human Resources Advisors, and Workforce Gold, chaired by the DCC with input from the Human Resources and Occupational Health teams, who review data and activities related to recruitment, learning and development, absence, and attendance.

Information collated includes: the percentage of employees absent at month end (split by all staff, officers only and staff excluding PCSOs). This data is also broken down by Business Command Unit and sickness reason. For information, excluding the categories of miscellaneous and unknown, the highest percentage of cases are in the groups of psychological and musculoskeletal problems.

Specifically in relation to long-term sickness, weekly reports show the reason for the absence and the number of days lost (at the time of the latest report being produced, 28th June, there were 56 cases on long-term sickness).

The Workforce Bronze meetings also review the progress made in individual cases of absence.

Commentary supporting the data tables presented to the Workforce Board detail the top three absence types within the reporting month and updates regarding any trends, initiatives and updates to guidance and support available to staff and line managers. The May 2023 report contained significant additional notes including updates on the Police Covenant, the use of Fair Passports, occupational therapy referrals and the emerging risk of the impact of the new Personal Safety Training on response officers, in particular the over 40's.

It was also noted that the report highlighted that return-to-work interviews were not being consistently undertaken with a completion rate of only 37%. Audit testing also confirmed that informal review meetings had not been completed in all cases and a recommendation has been made in relation to improving performance in this area.

Other Findings

The Constabulary utilises its Yammer social network to communicate with staff. Examples of communications provided in relation to absence management included reminding managers to record absence in the Crown Duties system and information regarding the Fair Passport.

The Constabulary utilises the Wellbeing and Inclusion Hub on its intranet page to promote welfare and support that is available to all members of staff. This includes links to information in relation to chronic illness, domestic abuse, mental health wellbeing, the menopause, carers, positive action and family support. A number of these areas have also been discussed at the monthly Wellbeing meetings.

The Management of Limited Duties for Police Officers Policy and Procedure sets out the arrangements in relation to police officers who are to be considered for recuperative, adjusted, or restricted duties. A spreadsheet is maintained recording all staff who are on recuperative or adjusted duties, and this is reviewed weekly by the Senior Human Resources Advisors, identifying any cases where an intervention is required. Data provided showed that there were 83 officers and 11 police staff on limited duties at the time of the audit review. Appropriate notes had been recorded against each entry on the Limited Duties spreadsheet.

Full quarterly reviews are undertaken to evaluate the status of all staff who are on sick leave. This includes a review of which staff are not in their substantive role and where they are currently placed. The Occupational Therapy team review any ongoing adjustments in place, for example in hours or days worked. For any staff who are not at work, consideration is given to redeployment on medical grounds into vacant posts within their command. A trail period (of a minimum of four and maximum of 12 weeks) may be used and additional training provided where required.

Scope and Limitations of the Review

1.	The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

Disclaimer

2.	The matters raised in this report are only those that came to the attention of the auditor during the course of the review, and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. 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. 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.

Effectiveness of arrangements

3.	The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

Assurance Assessment

4.	The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

Acknowledgement

5.	We would like to thank staff for their co-operation and assistance during the course of our work.

Release of Report

6.	The table below sets out the history of this report.

Stage	Issued	Response Received
Audit Planning Memorandum:	16th June 2023	23rd June 2023
Draft Report:	20th September 2023	13th November 2023
Final Report:	13th November 2023	

Client:	Police and Crime Commissioner Cumbria and Cumbria Constabulary		
Review:	Absence Management		
Type of Review:	Assurance	Audit Lead:	David Robinson

Outline scope (per Annual Plan):	The review considered the arrangements for: recording, reporting and monitoring absence. The scope of the review also considered the arrangements to promote wellbeing and reduce absence.	
Detailed scope will consider:	**Directed** Governance Framework: There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation. Risk Mitigation: The documented process aligns with the mitigating arrangements set out in the corporate risk register. Compliance: Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	**Delivery** Performance monitoring: There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner. Sustainability: The impact on the organisation's sustainability agenda has been considered. Resilience: Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.
Requested additions to scope:	(if required then please provide brief detail)	
Exclusions from scope:		

Planned Start Date:	13/07/2023	Exit Meeting Date:	30/08/2023	Exit Meeting to be held with:	Human Resources Manager

SELF ASSESSMENT RESPONSE

Matters over the previous 12 months relating to activity to be reviewed	Y/N (if Y then please provide brief details separately)
Has there been any reduction in the effectiveness of the internal controls due to staff absences through sickness and/or vacancies etc?	N
Have there been any breakdowns in the internal controls resulting in disciplinary action or similar?	N
Have there been any significant changes to the process?	N
Are there any particular matters/periods of time you would like the review to consider?	N

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