



**Minutes of Audit and Risk Committee
5 April 2023**

Attendance

Committee:	Paul Dempsey (Chair), James O'Boyle and Emily Logan
Secretary:	Pauline Byrne, item 5
Management/Staff:	Aileen Healy (Director of Administration), Amanda McLoughlin (Head of Finance) item 6.2, Valerie Woods (Principal Officer of Administration) Ellen Kenny (Data & Governance), Louise Prendergast & Barbara Page (Transition) item 4.2 Joanne O'Donohue, item 7
Visitor:	Neil Hughes (Grant Thornton) item 4.1 Robert Bourke (Mazars) item 6.1.

1. Committee Chair Opening Statement

The agenda was approved and no conflicts of interest were declared.

2. Minutes and Matters Arising

The minutes of the ARC meeting on 1 February 2023 were reviewed and approved.

3. Director of Administration Update

The Director of Administration briefed the Committee on the main developments since the last meeting, including:

- The Policing and Security Community Safety Bill (PSCS Bill) is at second stage of the Dáil, Committee stage dates are scheduled for 25 April and 9 May 2023. The Department of Justice (DOJ) remains confident that the Bill enacted before the summer recess and remains committed to a commencement date of 1 January 2024.
- A draft of the Grant Thornton Report has been received and is under consideration. This will inform GSOC's business case for future resources, which is expected to be made to the DOJ in May/June in advance of the 2024 estimates process. The importance and scale of work involved in GSOC's business case was acknowledged.

- GSOC held a Townhall meeting for staff on 2 March 2023 with high attendance, interest and engagement. Grant Thornton presented a summary of their high-level finding and recommendations to staff.
- The draft 2022 Financial Statements were signed by the Chairperson and submitted to the Comptroller and Auditor General (C&AG) on 30 March 2023.
- GSOC's 2022 Annual Report has been submitted to the Minister of Justice by the statutory deadline of 31 March 2023.
- Continued progress with the Risk Register, noting that the new Risk Management Group are scheduled to meet at the end of the month.
- The Departmental Council is now in place and a positive first meeting was reported, noting willingness to engage constructively with the transition process.
- Staffing levels, noting a number of new starters including a senior legal advisor and a number of ICT apprentices. It was noted, however, that GSOC continues to have a high level of staff turnover, noting in particular the departure of the Head of Legal Services on promotion.
- The tender for a Case Management System (CMS) procurement specialist has gone to market and responses will be evaluated in the coming weeks. A business analyst has commenced work on the mapping processes for the new CMS. The first meeting of the CMS Project Board is scheduled for next week.

The Committee was briefed on GSOC's new Monthly Activity, noting that the format of the report would continue to develop as a management tool. There was a discussion on the information provided by GSOC's Operations Unit and it was emphasised that data relating to unit performance, which would allow trends to be monitored, were required. The Committee noted that it would expect to see more information on performance linked to the organisation's objectives, better categorisation of cases, case numbers and status and the use of proxies for outcomes and effectiveness. While it was acknowledged that the current CMS is not capable of providing all the data required, it was emphasised that this will need to be addressed in the new CMS and that the automated production of management and performance data needs to be in scope for the development of the new system. Overall, there was concern at the lack of informative data to inform management decisions, noting that the KPI's in use in the organisation and how they are used, are inadequate. It was noted that GSOC's analysts produce quarterly reports and it was agreed that the most recent report would be circulated for the Committee's information.

4. Transition

4.1 Grant Thornton Presentation

The Committee welcomed the Grant Thornton representative, who gave a presentation on the high-level finding of their Organisation Review of GSOC. The prompt action already taken by the Commission in response to some of the findings, resulting in, positive changes being implemented very quickly, was noted.

The attendance and engagement at the recent Town Hall meeting and the apparent appetite for change were also emphasised as indicative of the level of engagement by staff in the process.

Grant Thornton outlined the extensive benchmarking exercise undertaken with comparable organisations, noting different remits and highlighting some factors for comparison with GSOC including caseloads and KPI's. The Committee suggested that it would be beneficial for GSOC to examine the benchmarking material collected by GT to inform the development of a performance management system for the new organisation.

The Committee queried the evidence base for the recommendation of additional resources, noting that the estimated increase in workload did not appear consistent with the additional resource ask. It was explained that new remit, including the option for complainants to seek a review of certain decisions, together with an increasingly complex workload, meant that the increase in resource requirements was not pro-rata to expected increases in case numbers. The Committee emphasised the need for scientific data to provide an evidence base for seeking additional resources.

The Committee discussed a number of significant challenges and risks for the organisation arising from the presentation, including performance management, quality and timeliness, leadership and vision, culture, communication and engagement. They emphasised that additional resources are not the panacea to many of these issues, emphasising the critical role of line managers and their understanding of their role, and the importance of developing capability, particularly in terms of leadership skills. It is also crucial to define a resourcing model by categorising cases in terms of difficulty/complexity and specifying the competencies required for each.

It was noted that the term for the current members of the Ombudsman Commission would end in December 2023. The Committee advised GSOC not to underestimate the time taken to fill the designate positions under the new legislation and the impact of uncertainty concerning who will fill these roles, noting difficulties in the absence of the designate team in place.

The Committee thanked Grant Thornton for their presentation and look forward to seeing the recommendations in their report, noting that a lot of their findings also apply to business as usual and need to be addressed urgently.

4.2 Transition

The GSOC Transition Team confirmed that the Grant Thornton Report is still to be finalised. This needs to feed into the business cases that will be required to seek additional resources in the estimates bid. It is also anticipated that further detail will be required to address issues which DOJ have indicated they will expect to see addressed in the business case.

The Committee asked about the governance arrangements for the transition project, noting that a proper project structure, with a project or programme board, needed to be in place with responsibility for resolving issues, escalating them to the Commission if necessary and reporting on a monthly basis to the Commission.

The Committee noted that feedback received from staff following the Townhall meeting was positive and there was a continued engagement with staff through Communications Days and the bi-weekly Organisation Bulletin. However, they emphasised the importance of continued staff engagement with the transition effort.

5. Data Protection

The Data Protection Officer (DPO) briefed the Committee on the current position of GSOC's Data Protection Policies and their revised timescales. The Committee noted the current workload within GSOC's Data Protection Unit and discussed the nature of data breaches received and the process involved in dealing with them. It was agreed that the risk associated with some data breaches could be serious and therefore this category should be added to GSOC's Risk Register.

The DPO outlined recent changes made to the processing of Subject Access Requests (SARs) in order to streamline and simplify the process, which include processing SARs under GDPR or Part 5 of the Data Protection Act 2018. The Committee noted that new redaction and telephone software is currently being sourced to assist in the processing of SAR's.

6. Audit

6.1 Internal Audit

The Committee welcomed the representative from GSOC's Internal Audit service, Mazars, who joined the meeting via Zoom. He briefed the Committee on the development of the Audit Universe, noting that it has been prepared after review of the Risk Register, the C&AG's management letter, the organisational chart and other GSOC documentation, and meeting with each member of SMT. The Committee welcomed the comprehensive document noting the broad coverage of the organisation and of both generic topics and matters specific to GSOC.

The Committee considered the draft Internal Audit Plan for 2023-34, noting that it was impossible to cover the whole remit of the organisation in a 2-year timeframe and the necessity of prioritising high-risk areas. There was discussion on some areas that were considered to present a higher risk and should be prioritised. Internal Audit advised that the Internal Audit Plan was a living document and there was scope within the plan to address alternative areas if the Committee wished.

After discussion, it was agreed that an audit of performance management should be prioritised in the 2023 audit plan, as this would inform changes required in advance of the Office of the Police Ombudsman being established in January 2024 and would align with the development of the organisation's new Statement of Strategy.

6.2 Follow-up Audit Recommendations

The Committee considered a report from DOJ Internal Audit in relation to their follow-up review of audit recommendations. The Head of Corporate Services briefed the Committee on the current position in relation to the outstanding audit recommendations.

The Committee noted the work in progress and asked that:

- The revised Corporate Procurement Plan be submitted to the Committee in Q3; and
- The Head of ICT to brief the Committee at its next meeting on the Disaster Recovery Plan.

7. Risk Management

The Chief Risk Officer (CRO) briefed the Committee on the ongoing development of the Risk Register and the Committee acknowledged the quality of the work done to date. There was a discussion in relation to particular areas of potential risk and it was agreed that these would be considered and added to the register as appropriate.

The establishment of the Risk Management Group, the role of which will be to review, evaluate and identify emerging risks within GSOC, to monitor the status of mitigating actions, and keep the risk rating under review, with the first meeting of the Group scheduled for 25 April 2023. The Committee noted that GSOC staff have been made aware of the Risk Management Policy and the dedicated internal risk site on Orion. The Risk Register will be submitted to the Commission for approval, once the Risk Management Group has reviewed the consistency of risk ranking and assigned ownership of risks and actions. The register will then be subject to ongoing update and will evolve over time in terms of the level of detail required.

8. AOB

The next ARC meeting is scheduled for 28 June 2023.

9. Closed session

The Committee members held a closed session without the Executive present.