

## **Port - CCTV Full Audit (extract from audit report)**

### **Executive Summary**

An audit of the processes and procedures surrounding CCTV operation at Portsmouth International Port has been undertaken in accordance with the 2018/19 Audit Plan.

**Achievement of Organisation's Strategic Objectives Assurance Level:** Limited Assurance

#### *CCTV Policy*

Initial testing in December 2018 revealed that there was no current CCTV policy, and that staff were not aware of the existing Code of Practice. Copies of a newly formed CCTV Policy and Impact Assessment, dated February 2019, were provided during the course of audit testing.

A high-risk exception has been raised.

**Compliance with Policies, Laws and Regulations Assurance Level:** Limited Assurance

#### *Compliance with Surveillance Camera Code of Practice*

Audit testing sought to establish that CCTV camera operation at Portsmouth Port is being undertaken in accordance with the twelve guiding principles of the Surveillance Camera Code of Practice. Compliance with these principles was evaluated with reference to a completed self-assessment tool, with clarification and further evidence provided by the Duty Port Operations Manager.

Seven key issues were identified, where the CCTV operation at the port was not compliant with the expectations of the Code of Practice.

A high-risk exception has been raised.

**Safeguarding of Assets Assurance Level:** Limited Assurance

#### *Staff Qualifications*

Details of all twenty-five staff with access to the CCTV system were obtained from the Duty Port Operations Manager, alongside certificates of any relevant training. Testing established that:

- 24/25 (96%) staff had received certification in HABC Level 2 Award for Working as a CCTV Operator (Public Space Surveillance) within the Private Security Industry. This qualification is endorsed by the Security Industry Authority, a regulatory body affiliated with the Home Office.
- 1/25 (4%) did not have any formal CCTV-specific training; however, their role is as a download technician, working as part of IT services, rather than as a CCTV operative.

No issues were raised in respect of the above testing.

#### *Access to the Control Room*

Door access logs were obtained from the Duty Port Operations Manager, to show the members of staff that had gained access to the security lobby and port control main doors, between 31/12/18-01/03/19.

Access records were compared against the list of twenty-five staff with CCTV system permissions, in order to highlight any potentially inappropriate access to CCTV data. The following results were observed:

- 1547 separate entries were recorded during the time parameters tested. Of these, 1250 (81%) related to entries made by staff with CCTV permissions.
- 297 (19%) entries were made, either by named staff not on the CCTV permission list, or unnamed staff gaining access under a security pass.

A copy of the CCTV visitor log was obtained and reviewed in addition to the above records. The log is handwritten, and digital analysis was not possible; however, it is clear from the log that there are a large number of staff accessing the control room for a variety of listed reasons, including 'keys', 'photocopying', 'water' and 'delivery'. There is an option on the form to indicate that the visitor had been accompanied by an appropriate staff member; however, this had only been completed for 125/247 (51%) visits. Although there may be other reasons for staff to access the room in which CCTV equipment is held, the above results show that there is the potential for data to be viewed by unauthorised individuals, and a high-risk exception has been raised.

#### *Backup of Data*

A response was received from the Duty Port Operations Manager to state that regular backups of CCTV data are not undertaken. To mitigate the risk of any potential data loss, the system is supported by an Uninterrupted Power Supply (UPS) and generator, which is designed to maintain power to the equipment in the event of a total failure.

Principle six of the Surveillance Camera Code of Practice states that images should not be stored for more than that which is required for the stated purpose of the system, and that such information should be deleted once that purpose has been discharged. In compliance with this requirement, the Port's Privacy Impact Assessment Form states that images are typically retained for thirty days before being deleted. Thirty days has been designated an appropriate timeframe, as it is anticipated that Police would make a representation quickly, in the event of a serious incident.

A policy statement, made in February 2019, states that data may be stored for longer than thirty days, but only in response to receiving a lawful information request, made under the Data Protection Act 2018 or Freedom of Information Act 2000. The Duty Port Operations Manager has indicated on the self-assessment form that the Port would have no backup of data, if the Police should seize the CCTV hard drive; however, information sharing procedures indicate that if disclosure is required, DVD copies would normally be made, and this situation is unlikely.

No exception has been raised in relation to the above testing.

**Effectiveness & Efficiency of Operations Assurance Level: Reasonable Assurance**

### *Monitoring & Maintenance*

The Duty Operations Manager advised that weekly user checks are undertaken by the Security Supervisor. Logs are stored within the Comino system, with copies held by the Engineering Manager and Deputy Port Operations Managers. Audit testing sought to evidence that weekly monitoring has been undertaken, and maintenance logs from 1<sup>st</sup> January 2019-29<sup>th</sup> March 2019 were requested from the Duty Operations Manager.

Logs were provided for 9/13 (69%) of the weeks requested, and the Duty Operations Manager advised that logs for the remaining four weeks (31%) were not available. Examination of the logs revealed that at least one minor issue was identified for 6/9 (67%) weeks provided.

Clarification from the Head of Engineering revealed, however, that maintenance checks on the system are also undertaken. These cover a similar set of criteria, and records were provided for each of the weeks in which the user checks were missing. Although

both sets of checks are considered necessary, the maintenance checks should mitigate any risk regarding the condition of the system, and an exception has not been considered necessary.

### *Image Quality*

Principle eleven of the Surveillance Camera Code of Practice states that surveillance camera systems should '...be used to support public safety and law enforcement with the aim of processing images and information of evidential value.' This aim is supported by a defined set of minimum standards, as set out by the British Standards Institute.

The Duty Operations Manager advised that, at present, the system does not meet the required threshold; the quality of some recorded images renders them inadmissible in court, particularly with regard to facial recognition. This is due to image pixilation, which cannot be rectified as the replacement parts are no longer available.

The completed self-assessment form recognises that investigation into the provision of a new digital system is required; however, no further details are yet known.

Further confirmation was sought from the Network and Server Technician, who provided a technical specification for the CCTV system. The specification states that the system is compliant with British Standard BS8418. This standard provides a range of conditions for such systems, with BS8418:2015 (11.3) stating that, where data and/or images are stored digitally and might be required as evidence for a crime, then this should be in accordance with further standard BS IEC 62676-4:2014.

As such, it is reasonable to assume that the system 'as new' was compliant with evidential standards.

Although the self-assessment form indicates that the image quality has degraded, this view is not supported by the CCTV management group, and is not possible to substantiate without specialist analytical tools. The group have advised that there has been no negative feedback from the Police, and nothing to indicate that there is an issue with the image quality. As a result, no exception has been raised.

**Reliability & Integrity of Data Assurance Level: Limited Assurance**

### *Retrieval & Use of CCTV Data*

Audit testing sought to ascertain that clear records are held of all requests made for CCTV footage, as well as records to show a clear management trail of the retrieval of any such data. Details of all requests and retrieval from 01/01/19-29/03/19 were requested, and records were examined with reference to the port's CCTV Access and Disclosure Work Instruction for staff.

Issues were noted in respect of all five sets of data within the sample, including the errors in the completion, or absence, of records, errors in the data, and supporting evidence for the request.

A high-risk exception has been raised.

**Completion of the audit Assurance Level: No Assurance**

Four high-risk exceptions have been raised as a result of audit testing. A *no assurance* audit was issued in March 2017, and, despite work being undertaken to reduce the level to *limited* in January 2018, several actions remained outstanding. Although some of these areas have now been addressed, subsequent to the start of this audit (audit commenced November 2018), it is not clear that these issues would have been progressed otherwise.

Despite the work undertaken, the audit identified several key issues with CCTV operations at Portsmouth Port, affecting compliance with the Surveillance Commissioner's Code of Conduct and internal policy.

Some additional evidence has been provided since the issue of the first 'final' report, and two exceptions have been removed, with this report noting that improvements across various areas have since been made, however there is acknowledgement by the Port that this was not the case as at testing. As a result of the remaining issues, Internal Audit are giving a no assurance opinion, based on the testing and evidence supplied at the time.

Senior management are confident that full evidence will be available to significantly improve this position in any future reviews. The CCTV management group's action plan has been attached to this report, to indicate the current position.

## **Home to School Transport Full Audit (extract from audit report)**

### **Executive Summary**

PCC currently coordinates home to school transport services to 640 children. An audit into Home to School Transport has been undertaken in accordance with the 2018/19 Audit Plan.

**Compliance with Policies, Laws and Regulations Assurance Level: No Assurance**

#### Insurance

Testing sought to establish that third party operators had provided evidence to show that they have had the required types and levels of insurance at all times, whilst providing transport services for the council. In addition, testing sought to establish that drivers operating for PCC had met the required conditions to be covered under PCC's fleet insurance.

It was not possible to confirm the list of PCC drivers operating home to school routes, in order to undertake a reconciliation with training records. Furthermore, testing was unable to evidence that operators employed to undertake home to school routes had provided the insurance documentation required under the procurement framework.

A critical-risk exception was raised in 2014/15, as operators were not being asked to provide evidence that they held the required insurances. Although corrective action was taken at the time, this has not continued, and a critical risk exception has again been raised.

#### Licensing & DBS

PCC provided home to school transport across 145 routes during 2018/19. Home to school transport is provided by PCC staff and local taxi companies, under a Dynamic Purchasing System (DPS) that was negotiated in 2016. All drivers and Passenger Assistants involved in the provision of this service are required to provide evidence to PCC of an enhanced DBS check.

Taxi drivers must provide evidence of their DBS check to PCC Licensing, in order to gain their taxi licence. Evidence of licence and DBS checks for PCC staff and Public Service Vehicles are held by the Safer Travel Manager's team, and were provided in response to audit testing. Issues were raised in respect of 5/22 (23%) drivers and 8/108 (7%) passenger assistants, for whom current DBS checks could not be located.

A critical risk exception was raised during the 2014/15 audit, as it was not possible to reconcile lists of taxi drivers undertaking the routes with the appropriate vetting records. As a result, an action was agreed to obtain the names of all drivers undertaking home to school routes, with confirmation of their DBS status, for reconciliation with PCC Licensing records. This practice was to occur annually during the spring term, and was to be subject to spot checks. The Safer Travel Manager advised that, due to personnel changes within the team, this action has not been carried out since 2016.

A critical risk exception has been raised

## Tender Process

### *Framework*

A high-risk exception has been raised, as it has not been possible to clarify the details of the framework under which the home to school transport team procure their services

### *Tenders*

Twenty-seven routes were put out to tender, during the most recent tender exercise in September 2018. Testing sought to establish that clear records were held in relation to the tender returns, and that the lowest price had been selected, in the absence of any other clarifying information. The information submitted during the exercise was compared with the finance spreadsheet, showing current contracts and pricing.

Testing found that records were held on Intend in respect of all tender responses received. Prices and operators were matched, or otherwise explained, in 21/27 (78%) routes. Audit testing raised queries in respect of the remaining six (22%), for which discrepancies were identified between the two sets of records.

A response was provided by the Integrated Transport Co-ordinator, who advised that:

- Three routes (11%) did not run, and so were not present within the monitoring spreadsheet.
- Two routes (7%) were amended, by removing an address and adding a wheelchair client, changing the final price.
- The details of one route (4%) changed; however, the daily price was also not correctly entered on to the monitoring spreadsheet.

A medium risk exception has been raised in respect of the erroneous entry within the monitoring spreadsheet.

### Invoices

An EBS transaction report was run under the relevant departmental cost code, and a sample of twenty-five invoices, received from operators in respect of home to school transport provision, was selected for testing. Scanned copies of the relevant invoices were obtained from the departmental home drive and the details were compared with the team's financial monitoring spreadsheet.

An issue was raised in respect of one route (4%), for which an invoice had been submitted at £8, when the monitoring spreadsheet indicated that it should be £12. The Integrated Transport Coordinator advised that this was because the requirements of the route had changed since it was agreed in 2017/18, but the price was mistakenly copied and pasted onto 2018/19 spreadsheet.

A low-risk exception has been raised.

**Effectiveness & Efficiency of Operations Assurance Level: Limited Assurance**

### Monitoring & Complaints

Audit testing sought to establish that there was effective monitoring of provider performance and compliance, and that there was a thorough method by which to record and address any complaints made against the service.

It was not possible to establish any formalised compliance or performance monitoring and, whilst some complaint records were located, they did not correlate with information obtained from the Safer Travel Manager, nor were they recorded with reference to a defined complaints procedure.

A high-risk exception has been raised.

**Completion of the audit Assurance Level: No Assurance**

Six exceptions: two critical-risk, two high-risk, one medium-risk and one low-risk, have been raised as a result of audit testing. There are particular concerns around the lack of DBS records for PCC employees, and the monitoring of the framework for external operators, including DBS and insurance verification. Until the risks associated with these exceptions can be mitigated, Internal Audit can give no assurance that the processes and procedures around home to school transport are of low risk to the authority.

## **Hire Cars Full Audit (extract from audit report)**

### **Executive Summary**

A review of the administration and control of hire cars at PCC was conducted as part of the 2018/2019 Internal Audit Plan.

PCC currently have a contract in place for the supply of a vehicle hire service for work related journeys.

The results of testing have been summarised below under the following assurance levels.

**Compliance with Policies, Laws and Regulations Assurance Level:** Limited Assurance

#### **Contract:**

Testing included a review of the Vehicle Hire Service Framework on the procurement supplier management system 'Intend' to ensure that there is a current signed contract in place which is compliant with the PCC Contract Management Procedures and which has been signed by both parties.

The Vehicle Hire Service Framework specifies that a contract (valued at £300,000) has been in place for the period 01/04/2016 to 31/02/2019 and this contract was given an extension until 31/03/2021. However, there is no evidence of a contract either on Intend or held by the Safer Travel Manager.

The PCC Contract Management Procedures, which are located on the intranet, includes the "Contract Set up Form." The Contract Set up Form stipulates under the header "Document Storage" that "Contracts with lifetime value of £100k and over must be executed under seal by Legal Services, who will upload a copy of the contract to In-tend."

Discussions with Legal Services confirmed a signed copy of the contract had been in their possession, and that an electronic copy had been forwarded to the procurement professional on 24/05/2017 to be uploaded on intend. As at the date of testing no contract was located on In-tend.

In addition, the PCC Contract Management Procedures, which are located on the intranet, stipulate that Key Performance Indicators (KPIs) should be monitored and recorded and that formal performance review meetings should take place at appropriate intervals depending on the classification of the contract.

Testing highlighted that the 'person responsible' for the management of the Contract has now left the Authority and the 'person responsible' for monitoring of the KPIs has now left the department. In addition, there is no evidence of either monitoring, recording of the KPIs or formal performance review meetings for this 'contract.'

Based on testing conducted, one high risk exception has been raised under contracts.

Financial Rule R7 - Hire Car Purchases:

Financial Rule R7 states 'Where an item is available through the corporate contract then the corporate contract must be used. If it is not available and is likely to be a recurring item of spend, or a one off high value item of spend, then consultation must take place with the Assistant Director of Contracts, Procurement and Commercial to obtain the best price.'

A Purchase Order report was obtained from the Business Support Manager for the period 01/04/2018 to 14/02/2019 and a Purchase Cards Transaction report was extracted from Barclaycard Spend Management for the same period.

IDEA Data Analysis Software was used to compare the two reports using the narrative details "Hire Cars" to highlight any purchases which may have related to this area of activity.

The match highlighted 15 records and all 15 were reviewed further via Barclaycard Spend Management to confirm that 15/15 (100%) were compliant with the requirements of Financial Rule R7.

Based on testing conducted, no exceptions were raised under this area.

Driving Assessments:

The Driving for Work policy stipulates 'Employees who drive vehicles owned/leased to the council as part of their core activities, should receive appropriate driver training.'

In addition, the PCC Intranet states 'All staff that drive vehicles owned or leased to the council as part of their job must complete a driving assessment.'

An Excel Spreadsheet which details 'passed' and 'failed' driving assessments is maintained by the Home to School & Fleet Coordinator on the w; drive. The spreadsheet indicates that 119 employees have passed the driving assessments since April 2017

and 27 employees either did not complete the driving assessment or failed. There is no evidence that any of these 27 employees subsequently booked a hire car from the sample tested.

A sample of 25 employees who hired a car during the period April 2018 to February 2019 was selected from the list of car hire statements for that period and compared to the Driving Assessment spread sheet. (It should be noted that due to the format of information held on the statement it was not possible to determine the full population size).

Testing highlighted that for 20/25 employees (80%) there was no evidence on the spreadsheet that a driving assessment has been completed, for 2/25 employees (8%) the assessment appeared to have been completed after the hire of the car and for 3/25 (12%) the assessments were completed before the hire of the car.

Based on testing conducted, one high risk exception has been raised under Driving Assessments.

**Effectiveness & Efficiency of Operations Assurance Level:** Limited Assurance

#### Pre-Journey Checks:

The Safer Travel Manager confirmed during the course of the review that a new process has been introduced to evidence pre and post journey checks. (The requirement to undertake Pre/ Post journey checks has always existed, although the request and recording method was not clear). Once a hire vehicle has been booked, an electronic booking confirmation is sent to the user. The booking confirmation prompts a message to be sent with a 'PCC Damage Inspection form' for the user to acknowledge and evidence that they have completed the pre and post journey checks to the vehicle. At the conclusion of the journey, the Damage Inspection form is required to be returned to the fleet management team and the contractor. By completing these checks PCC are more able to refute claims of damage, without such checks the Authority is exposed and more likely to be liable to insurance claims.

This process was implemented on 20/02/2019 and there were no completed forms to review for testing purposes. However, the contents of the message and document were reviewed for adequacy and the following points were noted;

- The email prompt and Damage Inspection form do not specify a timeframe within which the exercise needs to be reported to Fleet / the contractor.
- It is not possible to identify the originator of the completed form.
- There is no evidence that an escalation process is in place if damage occurs or if a form is not completed / sent to Fleet / the contractor.

Based on testing conducted, one high risk exception has been raised under Pre-Journey Checks.

*Driving Accidents and Incidents:*

The Driving for Work Policy specifies "in the event of an accident or incident involving a vehicle owned/leased/hired by PCC a completed 'motor claim/incident report' form must be forwarded to the PCC Insurance team within twenty four hours of the incident."

Discussions with the Insurance Support Officer confirmed details of all claims in relation to hire car vehicles are held on the claim management software called 'Evo Claims.'

A report was extracted from 'Evo Claims' of all accidents and incidents for the period 01/04/2018 to 31/01/2019. Testing highlighted a total of 17 hire car claims made during the testing period at a total cost of £4,333.17 which was then recharged to departmental budgets.

Testing highlighted that 5/17 (29%) accidents were reported by the employee to the PCC Insurance team within 24 hours of the incident. However, 12/17 (71%) of the claims had no evidence that notification had been sent to the PCC Insurance Team, but the damage was reported to the team by an employee of the contractor.

Based on testing conducted, one high risk exception has been raised under Driving Accidents and Incidents.

**Completion of the audit Assurance Level: No Assurance**

Overall four high risk exceptions have been raised as a result of testing. There is particular concern in relation to the lack of transparency in publishing the contract on In-Tend and KPI monitoring, failure to report incidents and accidents and failure of users to carry out sufficient pre and post journey checks all of which place the Authority in a potentially vulnerable position in the event of a dispute with the hire car provider. For these reasons, Internal Audit has given a no assurance opinion that this area is of low risk to the Authority.