



# THE CHIEF CONSTABLE OF NORTH YORKSHIRE

## Communications

FINAL Internal Audit report: 13.21/22

27 May 2022

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# 1. EXECUTIVE SUMMARY

## Why we completed this audit

As part of the approved internal audit plan for 2021 / 2022, we have undertaken a review of the Force's communications process to ensure that internal and external communications are managed and co-ordinated and that media enquiries are appropriately responded to. As part of the review, we have assessed several areas within the corporate communications team including their process for responding to media enquiries, the process for producing and releasing internal communications and reviewing communications with time-limited usefulness (such as website articles). This has involved the use of sample testing to determine compliance with policies and procedures.

The corporate communications team are responsible for responding to the media and incoming communications and releasing official Force communications to the public. The team is separated into three workstreams comprising of:

- The digital and evaluation team who are responsible for managing and co-ordinating the Force's social media;
- The internal engagement team who manage all internal communications within the Force such as through intranet articles or force-wide emails; and
- The external engagement team who work with local and regional elements of the Force with their communication to constituents.

The Force are currently implementing a new social media platform to help manage the Force's many social media accounts and to provide greater oversight and monitoring of messages received and content posted on each account. As the Force have a limited number of licences for the platform, only certain staff will be able to access the platform and they will only be granted a licence once they have completed training. This is being rolled out alongside a new social media policy (currently under development) which the corporate communications team hope will allow for greater guidance and advice for those responsible for social media.

The corporate communications team has numerous "desks" with those assigned to the desk responsible for differing responsibilities. For instance, the "newsdesk" is responsible for responding to all media enquiries that the Force receive that day and the "digital editor desk" responsible for social media posts. This is organised through a rota system available on all team members' Outlook calendar. All team members rotate working on the "desk" with (typically) a different member of staff assigned to the desk each day.

A service level statement was implemented in late 2020 by the corporate communications team to more effectively manage media enquiries and the media's relationship with the Force. The service level statement saw a stricter approach on enquiries sent by the media and what the Force will respond to. Since this introduction, media enquiries to the Force have significantly decreased.

## Conclusion

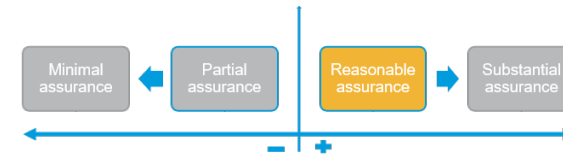
Most of the areas tested during our review of the communications process have controls in place and are working as designed by the Force. However, we noted three instances of controls not operating as intended and one instance of a missing control. The three instances where controls are not working as designed relate to the completion of a content strategy to provide guidance to staff when posting content to staff, the media and the public, a decision being made on whether social media posts require approval before they can be made public and reminding corporate communication staff that CCTV and local appeals should be removed from the Force website once they have exceeded the length set out in the CCTV and local appeals process document.

We noted one instance of a missing control which relates to the lack of a communications strategy that has been aligned with the Force's strategic objectives. As such, we have agreed **two medium** priority management actions and **two low** priority management actions.

### Internal audit opinion:

Taking account of the issues identified, the Chief Constable of North Yorkshire can take **reasonable assurance** that the controls upon which the organisation relies to manage this area are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified area.



## Key findings

### We identified the following finding that has resulted in two medium priority management actions being agreed:



The Force do not have a documented communications strategy in place which aligns with the Force's overall strategic objectives. We did however verify that a service plan is in place which lists the functions of the corporate communications team and how these functions link with the Force's strategic objectives.

There is a risk that if a communications strategy is not implemented, the corporate communications team may struggle to provide a consistent approach to communications and those communications that are released may not align with the Force's overall strategic objectives. **(Medium)**



During our review, we confirmed that social media posts are not reviewed and approved by a manager or specialist expert before being posted on the Force's social media accounts. The Force are currently implementing a social media platform which will be used to monitor and post content to the Force's many social media accounts (such as Twitter and Facebook) and as part of this platform we were informed that there is an option to allow all posts to go to the digital and evaluation workstream within the corporate communications team for sign off before being posted. The Corporate Communication Manager explained that this is currently being discussed and no decision has been made on whether this function should be implemented.

There is a risk that if a decision is not made on whether this function should be allowed, staff that may require oversight and training (such as those outside of the corporate communications team) could have access to post on Force social media accounts. **(Medium)**

For details of the remaining **two low** priority actions, please see section two of this report.

**Our audit review identified that the following controls are suitably designed, consistently applied and are operating effectively:**



The Force has several supporting processes on the Force intranet to help assist and guide both corporate communication staff and others from within the Force, when dealing with communications and the media. We confirmed that a media definition guide is available to staff to help them when dealing with the media and to provide guidance on how and when they should speak to the media. We confirmed that this document had been released to staff in June 2021 and was available to them on the intranet. A social media policy was released in April during our audit and helps provide a framework and guidance for staff using social media. A supporting social media playbook is currently in development to help provide additional guidance and support though this has not yet been released.



Corporate communications have a rota in place to help identify the individuals in charge of desks on specific days. Each desk has different roles and responsibilities and ensuring a clear rota is in place and available to look at on their Outlook calendar allows the team to know who is responsible each day. We confirmed this process with four separate members of the corporate communications team and from discussion with each it was clear that they were aware of the process and what their responsibilities are when on each desk. We reviewed the rota and confirmed that this had been set up several weeks in advance with the individual's name and what desk they are working on each day. This allows management to confirm sufficient coverage and resourcing for incoming communications and to ensure all incoming communications can be responded to within a timely manner.



A service level statement (SLS) has been created and implemented which outlines how the Force manage media responses and enquiries. One of the main reasons for this was to reduce the number of enquiries received by the Force as many were duplicates or a response had been uploaded to the Force website. We reviewed the SLS and confirmed that a clear set of standards had been set out for both the Force and the media to adhere to. During discussion with three Corporate Communications Managers, we noted that they all confirmed that media enquiries have decreased since the implementation of the SLS and those that are received are more appropriate – a clear indication that the media and internal staff are aware of the standards. We confirmed that the SLS was available on both the internal Q drive (accessible to all staff) and the Force website which is accessible to the public.



We confirmed that outgoing communications are not reviewed and approved before being released and that it is the responsibility of the staff member to ensure the content is to the standard required and that the piece does not contain any mistakes. The Corporate Communications Lead explained that this was due to the large volume of outgoing communications and the excessive time this would take to review and approve all before release. Despite this, we confirmed that only corporate communications staff can make outgoing communications on the Force website, intranet or to the media and that all staff are reminded of their responsibilities as part of initial training.



Incoming communications are not triaged as the Force do not receive enough, especially given the release of the service level statement with the media. For instance, we noted the Force received only 958 enquiries over the 2021-22 financial year which averages out at approximately 2.6 per day. Regardless, all media enquiries are logged on the Vuelio system which allows for a log of questions and an audit trail. The Vuelio system also has a function which allows staff to respond directly to the enquirer with the response saved on the system. We selected 10 media enquiries and confirmed that all 10 had been correctly logged on Vuelio and a response had been provided by the newsdesk within one working day (as specified within the service level statement). We noted eight of the 10 had been responded to on the same day with many being within an hour of receiving the enquiry.



We conducted sample testing of internal communications released within the Force consisting of two weekly bulletins, three force wide emails and five intranet articles to determine whether they were appropriate for the target audience (such as style, format and wording), had been released in a timely manner (where appropriate) and had been reviewed or signed off.

We did note that there is no requirement for internal communications to be signed off before release though during our testing we identified no issues and also noted several instances where an informal review or discussion had been undertaken by other staff members. Discussions with management indicated that they were satisfied with these arrangements as it was considered that the volume of activity made it impractical to counter-check everything and the cost of having someone to do it outweighed any perceived risk. We were not able to test whether each communication was in line with the Force's communication strategy as one is currently not in place.

Of the 10 internal communications we selected:

- All 10 communications contained clear and conscience language with all containing either guidance, links and images to assist the reader.
- Six of the internal communications had a time element (such as an upcoming event or organisational change) and we verified that in all six instances the communication was released within a timely manner.
- Four of the 10 internal communications had direct input and review from separate members of staff which we confirmed through review of email trails. An additional four internal communications have been taken directly from other staff members (such as a warning issued by senior staff regarding an upcoming storm) with the corporate communications team informally reviewing the content before release.



The Force has a CCTV and local appeals process document in place to cover time-limited communications that are posted on Force channels with regular reviews by the corporate communications team to ensure this is being adhered to. We reviewed postings of CCTV, wanted appeals and missing persons appeals on Force channels to determine whether communications that are currently available to the public are in line with the CCTV and local appeals process. For missing persons, we noted only one instance of an appeal that had been available longer than required.

The Corporate Communications Manager confirmed (through checking the crime number and police record) that this individual is still missing and therefore the appeal can still be on the website. For wanted appeals, we verified that there were only two appeals still available that were not recent (October and November). We confirmed this with the Corporate Communications Manager who again verified that these individuals are still missing, and the appeal is still appropriate to be on the Force website.

## 2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Area: Communications				
<b>Control</b>	<b>Missing control</b> The Force do not have a communications strategy in place but do have a service plan which details how the communications team will adhere to the Force's strategic objectives.		<b>Assessment:</b> <b>Design</b> × <b>Compliance</b> -	
<b>Findings / Implications</b>	<p>The Force do not have a documented communications strategy in place, but they do have a service plan which is used in place of a strategy and highlights the functions of the corporate communications team, the team's goals and strategy to achieve this and how they align with the Force's strategic objectives.</p> <p>The service plan is available to staff via the department's Q drive and we confirmed it is accessible to all staff within the corporate communications team.</p> <p>There is a risk that if the Force do not have a communications strategy that aligns with the overall strategic objectives, the Force may not have a consistent approach to communications as a whole and those communications that are released may not align with the Force's strategic objectives.</p>			
<b>Management Action 1</b>	The Force will create a documented communications strategy (using the corporate communications service plan as a supporting document) and align this to the Force's strategic objectives.	<b>Responsible Owner:</b> Corporate Communications Lead	<b>Date:</b> 31 October 2022	<b>Priority:</b> <b>Medium</b>

## Area: Communications

<b>Control</b>	The Force has several supporting processes on the Force intranet to support the implementation of the communication strategy including a content strategy and a media definition guide.	<b>Assessment:</b>  <b>Design</b> ✓ <b>Compliance</b> ×
<b>Findings / Implications</b>	<p>A number of process documents have been created and are available on the Force intranet which we have verified.</p> <p>A media definition guide is available on the intranet to help staff understand what is meant by the media, what information can be supplied to media and the general responsibilities to note when meeting with such individuals. We verified that this is a fairly recent creation and was implemented in June 2021 by the corporate communication team.</p> <p>A Corporate Communications Manager explained that a content strategy for The Source is currently in draft but when finalised will be used to provide guidance on what can and can't go on The Source. An estimated time for completion has been given as the next two-three months (finished in June 2022). There is a risk that if this is not completed, inconsistent formats may be used which could confuse readers of any communications released by the Force.</p> <p>A social media policy has been developed and is used as supporting documentation for social media. We confirmed that this had been released during the week of the audit (April 2022) and is used to support all social media processes and provide guidance to staff that are undertaking these processes. A social media playbook is currently in development and will also be used to help support the communications strategy and processes used by the communications team.</p> <p>We have not been able to determine whether these processes align with the communications strategy as there is currently no strategy in place. As such, our testing of this control has been limited.</p>	
<b>Management Action 2</b>	The content strategy for the Source will be finalised and provided to corporate communications staff.	<b>Responsible Owner:</b> Corporate Communications Manager  <b>Date:</b> 31 October 2022  <b>Priority:</b> <b>Low</b>

## Area: Communications

<b>Control</b>	<p>Staff are expected to ensure their own work is to a high standard before being released.</p> <p>No authorisation process is in place for outgoing communications.</p>	<p><b>Assessment:</b></p> <p><b>Design</b> ✓</p> <p><b>Compliance</b> ×</p>
<b>Findings / Implications</b>	<p>The Corporate Communications Lead confirmed that internal and outgoing communications are not authorised by a senior manager. This was reiterated by several Corporate Communications Managers during discussions across the audit. It was noted that staff are given the responsibility to create and publish content themselves and that it is not feasible resource-wise to have all content reviewed and approved before going live. Informal advice can be sought from colleagues or other staff within the Force though this is not a requirement and is at the discretion of the individual.</p> <p>During discussion with the Corporate Communications Manager in charge of social media, it was explained that a new social media platform is currently in development and is due to be released in the near future. As part of this platform, only 200 licences will be available for staff to use to access and post on all Force social media. As part of gaining a licence, training will be required to ensure all licence-holders are fully trained in what they can and cannot post and are aware of their responsibilities. This has yet to be implemented and as such we have not been able to test this.</p> <p>A function of the platform is that all posts must require approval before being posted on social media. The Corporate Communications Manager informed us that discussions are currently ongoing to determine whether this function will be implemented and if so, to what extent.</p> <p>There is a risk that if a decision is not made on whether approval is needed for posting to social media, staff that may require oversight and training (such as those outside of the corporate communications team) could have access to post on Force social media accounts.</p>	
<b>Management Action 3</b>	<p>A decision will be made on whether social media posts are required to go to the Digital Editor desk for internal quality review and approval before being released.</p> <p>This will include review of systems functions to determine whether specific groups or individuals (such as those outside corporate communications) require their posts to be approved before being posted</p>	<p><b>Responsible Owner:</b> Corporate Communications Manager</p> <p><b>Date:</b> 31 July 2022</p> <p><b>Priority:</b> <b>Medium</b></p>



## Area: Communications

<b>Control</b>	<p>Missing persons appeals, and wanted appeals are left on the Force’s website/social media until the person is found and confirmation by the relevant officer.</p> <p>CCTV appeals are left on Force channels for one month and it is then removed by the corporate communications team.</p>	<p><b>Assessment:</b></p> <p><b>Design</b> ✓</p> <p><b>Compliance</b> ×</p>
<b>Findings / Implications</b>	<p>A CCTV and local appeals process document has been created and used by the Force to ensure appeals are kept on the website and social media for the appropriate amount of time. The Corporate Communications Manager explained that regular review of both social media and the Force website are conducted by staff to ensure communications are removed when no longer required.</p> <p>We visited the Force website and reviewed the missing persons, wanted persons and CCTV appeal sections. For missing persons, we noted only one instance of an appeal that has been on the website for longer than required. We discussed this with one of the Corporate Communication Managers who explained that this individual is still missing, and the appeal is still ongoing. This was confirmed by briefly checking the crime number and record on the Force’s systems (Niche) to verify that the person is still missing.</p> <p>We reviewed the wanted appeals and noted only two individuals that were still on the website and were not recent (October and November respectively). We again discussed this with the Corporate Communications Manager who verified through review of the Niche system that these individuals were still missing and therefore valid to be still available.</p> <p>We noted only one CCTV appeal that has been on the website for longer than one month (originally posted 11 January 2022). As per the CCTV and local appeals process, this should have been removed after one month.</p> <p>There is a risk that if these posts are not removed in a timely manner, they could contain inaccurate or outdated information.</p>	
<b>Management Action 4</b>	<p>Corporate communication staff will be reminded to follow the CCTV and local appeals process to ensure these posts are not on the Force website longer than required.</p>	<p><b>Responsible Owner:</b> Corporate Communications Manager</p> <p><b>Date:</b> 31 May 2022</p> <p><b>Priority:</b> <b>Low</b></p>

## APPENDIX A: CATEGORISATION OF FINDINGS

### Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*		Non Compliance with controls*		Agreed management actions		
	0	(10)	4	(10)*	Low	Medium	High
Communications	0	(10)	4	(10)*	2	2	0
<b>Total</b>					<b>2</b>	<b>2</b>	<b>0</b>

\* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

## APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

### Objective and risk relevant to the scope of the review

The internal audit assignment has been scoped to provide assurance on how the Chief Constable of North Yorkshire manages the following area.

#### Objective of the area under review

The organisation has adequate and effective processes in place to ensure that internal and external communications are managed and co-ordinated and that media enquiries are appropriately responded to.

### Scope of the review

Being able to communicate effectively, clearly and on a timely basis with all interested parties within and without is very important for any organisation. North Yorkshire Police is currently in the process of introducing a social media management platform and has organised its corporate communication activities into three key streams:

- A Digital and Evaluation Team which manages the Force's social media accounts (incoming and outgoing) as well as the Force's website / internet presence. The Force currently has accounts on Facebook, Twitter, Instagram and LinkedIn, and a TikTok account is shortly to be launched following clearance by Information Management. The Force also has a community messaging service to which members of the public can subscribe.
- An internal engagement team which manages communications via the Force's internal channels: internal intranet, news bulletins and other internal publications.
- An external engagement team with members tagged to the geographic command areas and Specialist Operations to enhance communication with communities.

In addition, all members of the team cover off a daily news desk rota to handle incoming and outgoing communications with the media. A Service Level Statement was introduced in late 2020 to govern the Force's responses to media enquiries.

Following implementation of its new social media platform, the Force will issue its Social Media Policy which is currently out to consultation in the Force.

Our review will focus on the following areas:

- The Force has a communications strategy which is clearly aligned to the Force's overall strategic objectives.
- The Force has supporting processes which are aligned to its communications strategy and are known and understood by all relevant staff.

- Authority and responsibility for communications are clearly set out and understood by all relevant staff.
- The Force has a set of service standards and processes for the management of responses to media enquiries which are known and available to all relevant staff.
- Outgoing communications (internal or external) are subject to internal quality and accuracy checks and are authorised prior to release.
- Responsibility for monitoring incoming communications has been clearly allocated to ensure that no channels are missed.
- Monitoring incoming communications has sufficient coverage to ensure that responses can be made on a timely basis.
- Incoming communications are triaged and logged to ensure that responses are made in line with priority.
- Responses to media enquiries are made in line with agreed service standards.
- Internal communications are:
  - Linked to the Force's overall communications strategy.
  - Appropriately tailored to the requirements of the Force as well as the needs of staff and officers (in terms of style, content and means of communication).
  - Issued on a timely basis (for those considered to be time sensitive, i.e. in advance of changes, promptly following new developments).
  - Subject to checking and approval prior to release.
- Communications which have time-limited usefulness (e.g. website articles, publication of criminal justice outcomes) are subject to regular, periodic review to ensure that no outdated or superseded items remain available to access.

**The following limitations apply to the scope of our work:**

- The scope of this audit is limited to those areas examined and reported upon in the context of the objective set out for this review.
- Any testing undertaken as part of this audit will be compliance based and sample testing only.
- Our review will not consider, or guarantee, compliance with any legislation or regulatory standards in relation to communications by any means.
- Our review will not seek to endorse or approve the content of any communications and should not be considered as doing so.
- We will not consider the security, management, suitability or operation of any IT or other equipment used for communication purposes during the course of this review.
- Our review also does not guarantee the outcome of any future inspection by HMICFRS.
- Our work does not provide an absolute assurance that material errors, loss or fraud do not exist.

**Debrief held** 6 May 2022  
**Draft report issued** 20 May 2022  
**Responses received** 27 May 2022

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**Final report issued** 27 May 2022

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