



Llywodraeth Cymru
Welsh Government

A Report by Internal Audit Services

Emergency Planning, Preparedness and Response

May 2018

Assurance Rating				
	<p>Reasonable Assurance: Management can take reasonable assurance that arrangements to secure governance, risk management and internal control within those areas under review are suitably designed and applied effectively. Some matters require management attention in control design or compliance with moderate risk exposure until resolved.</p>			

Observations	Fundamental	Significant	Merits Attention
	0	4	2
	Immediate remedial action required	Requires remedial action as soon as possible.	Would benefit from improved control

Portfolio:	EPS
Audit Manager:	Name Redacted
Auditors:	
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Final Report Distribution

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Timing

The audit was undertaken between November 2017 and February 2018.

Acknowledgements

Internal Audit would like to thank colleagues in the Welsh Government Resilience Team and Resilience Policy Leads for their help and co-operation during our review.

Disclaimer

The opinions and assurances provided in this report are given solely for the use of the Welsh Government.

1 INTRODUCTION

- 1.1 The audit of Emergency Planning and Preparedness was identified as part of the 2017/18 audit plan, as agreed by the EPS Audit and Risk Committee. This area was previously audited in 2007 (Planning and Response to Civil Emergencies), 2010 (Swine Flu Pandemic) and 2014 (Resilience in Welsh Government).
- 1.2 The Welsh Government (WG) Resilience Team sits in the Community Safety Division and is responsible for co-ordinating resilience activity corporately for the WG as a whole and for public services at an all Wales level, among other things, making effective links between local responders and the UK Government in the event of a civil contingency situation.
- 1.3 The team also has responsibility for the co-ordination of planning, exercising, preparedness and response activities across WG through the Civil Contingencies Group (CCG) and Resilience Steering Group (RSG). In addition to the central Resilience Team, there is a network of local leads in WG with responsibility for resilience activities specific to their policy areas. The team supports the Wales Resilience Forum, the extensive membership of which provides the First Minister with assurance on Wales' readiness.
- 1.4 The Resilience Team leads on the operation of the Emergency Co-ordination Centre (Wales) ECC(W). The ECC (W)'s role is critical to gathering information and providing Welsh Ministers and the UK Government with a consistent, timely and quality flow of data as to the implications of emergencies in Wales as they develop and progress. The decision on whether to activate the ECC(W) will depend upon the nature and extent of any emergency in, or affecting, Wales and will generally be taken following discussion between the relevant policy Division and the Resilience Team.
- 1.5 Following a Wales Audit Report in 2012, the First Minister has agreed to the transfer of executive functions supporting Part 1 of the Civil Contingencies Act 2004 (CCA) through the Wales Act 2017. This is likely to take place by June 2018. This will give Welsh Ministers brand new powers to exercise additional functions including:
- Issuing guidance in relation to the civil contingency duties;
 - monitoring devolved responders and requiring them to produce information about how they have complied with their duties under Part 1 of the Act; and
 - bringing enforcement proceedings in respect of a failure by a devolved responder to comply with their duties under the Act.
- 1.6 With these functions comes the responsibility (and accountability) for the Welsh Ministers to ensure responders are fully prepared to fulfil their roles in the event of an emergency.
- 1.7 The budget for resourcing the Resilience Team is mainly the Direct Running Costs and is included with the overall budget for EPS. There are frequent requirements for additional resources and these are managed on an ad-hoc basis.

2 SCOPE OF REVIEW

2.1 The scope of the audit was to review:

- roles and responsibilities of the Resilience Team and lead departments in emergency planning, response & recovery with a specific focus on the readiness and capability of lead policy Departments;
- communication & coordination between the central Resilience Team and policy departments with resilience responsibilities;
- resource & facilities for the management and coordination of major incidents, including the ECC(W) in CP2, back up ECC(W) in Merthyr and their technical efficiencies;
- mechanisms to develop personal skills and resilience of critical policy and response staff including training and guidance;
- continuous improvement of emergency planning arrangements;
- preparedness of WG to accept the transfer of functions under Part 1 of the Civil Contingencies Act 2004 with effect from April 2018 and to exercise those functions appropriately.

3 EXECUTIVE SUMMARY

- 3.1 Based on the findings of our review, IAS can provide **Reasonable Assurance** on the controls in place over Emergency Planning, Preparedness and Response.
- 3.2 Roles and responsibilities of the Resilience Team in emergency planning response and recovery towards the corporate response are defined. However, the roles and responsibilities and expectations of WG policy leads to respond corporately were less well defined. In addition, discussion with policy leads on the capacity and capability of some divisions to respond to emergencies over a prolonged period was limited.
- 3.3 Communication mechanisms between policy departments, co-ordinated by the Resilience Team include attendance by senior officials at the RSG and the CCG. However, we identified a lack of appropriate engagement within the two groups from senior policy officials which creates risks around the ability to plan for and respond to situations and lessons learnt not being appropriately disseminated and addressed by those responsible. We recognise the difficulties faced by the Resilience Team in gaining buy-in from policy departments, both into the Groups and the corporate resilience activity, because participation towards the corporate response across Welsh Government (despite this being a business critical and reputationally risky area) is not mandatory. We have made an observation for the Resilience Team to review the existing governance arrangements, including the purpose of both groups and a review of membership.
- 3.4 We reviewed the resources and facilities available to co-ordinate an emergency response. Desk instructions were found to be in place for all ECC(W) locations and operating equipment. However, there are a number of issues regarding ECC(W) such as the lack of a routine maintenance policy for the facility; lack of clarity around the IT; or development programme to ensure that the functional requirements of the ECC(W) keep pace with advances in technology and developments elsewhere (e.g. UK Government).

- 3.5 There is a variety of training mechanisms in place for volunteers, co-ordinated by the Resilience Team. There is no minimum training programme in place and, as a result, the Resilience Team is unable to mandate the uptake of the provision to prepare volunteers fully. We understand a new approach to train and utilise volunteers is being developed by the Resilience Team and have made some suggestions about what could be considered for development going forward.
- 3.6 Lessons learnt from exercises and real events are captured by the Resilience Team in a central log following major events and exercises which has contributed to the improvement of resilience processes and procedures. In our view, the inclusion of sector specific lessons and a robust follow up process will enhance learning further.
- 3.7 Resource requirements have been identified by the Resilience Team to be able to carry out the new duties and activities required to support Ministers' responsibilities. The First Minister wrote to the UK Government on a number of occasions outlining the case for a transfer of resources associated with delivering the new functions but this was declined. Resources must therefore be found from within the Welsh Government.
- 3.8 WG officials have been liaising with HR and Finance colleagues and a minute was submitted to the Permanent Secretary in February 2018 to consider the case for additional resources. Whilst we can be assured the Resilience Team has assessed their forward needs, final decisions about the level of additional resources now rests elsewhere. Until the outcome is known, the team has judged its current capacity to be insufficient to take on the new functions.
- 3.9 Management has accepted all of the observations made in our report and we are content with their proposed action plan and the proposed timescales to implement recommendations (see section 5). The EPS Operations Group will undertake the follow-up of the actions and report this to the EPSG Audit and Risk Committee.

4 AUDIT NEEDS ASSESSMENT (ANA)

- 4.1 The ANA for this area (see Annex 2) previously scored as 13 (Medium Risk) following a Reasonable Assurance report (RN2014). Our revised rating of risk for the area going forward is 13 (Medium) based on the scores given below. The control score has been reduced to reflect the assurances given in this report. The inherent score has increased to 5 to take into consideration the additional responsibilities from the transfer of functions.

Revised Audit Needs Assessment	Financial	Reputational	Control	Inherent	Total
	2	4	2	5	13

5 AUDIT FINDINGS/OBSERVATIONS AND ACTION PLAN					
Ref	Finding / Observation	Risk / Impact	Agreed Action	Owner	Date
Significant Findings/Observations					
1.	<p>Roles and Responsibilities</p> <p>The Pan Wales Response Plan provides a framework for the management of an emergency affecting several or all areas of Wales and can be used in response to a major incident in one Local Resilience Forum area.</p> <p>However, there is not a similar framework in place detailing Welsh Governments internal roles and responsibilities and procedures. Specifically, for policy leads to escalate a sector-specific resilience response into a cross-cutting corporate response which is then co-ordinated by the Resilience Team.</p>	<p>Roles and responsibilities of policy leads are unclear.</p>	<p>While the role and responsibilities of the Team are clear, there is a practical issue regarding how WG policy leads engage during emergencies. Occasionally, that means the Team needs to assume functions and activities which otherwise should be carried out by the policy leads. Along with clarification of the respective roles, there needs to be a more defined practical contribution from policy leads and their departments. To address this, discussions will be held with the Perm Sec and DGs to consider issuing letters to Directors and Deputy Directors formalising their responsibilities and accountability on Civil Contingencies and their roles in corporate planning and response. The CCG is also establishing arrangements to escalate a sector-specific resilience response into a cross-cutting corporate response.</p>	Reg Kilpatrick	June 2018
2.	<p>Capacity and Capability</p> <p>The current process for identifying resource to respond to corporate emergencies within ECC(W) includes the use of a volunteer system, co-ordinated by the Resilience Team.</p> <p>Discussions with policy leads indicated that the capability and capacity for some policy teams to respond to an event for a prolonged period of time was unsustainable.</p> <p>In addition, there is no mechanism in place for co-ordinating volunteers quickly to respond to an unplanned event. The current process involves the Resilience Team contacting each volunteer individually via telephone. This process would be inefficient if an emergency response to an unplanned event was required.</p>	<p>Resources allocated within departments do not have the capability for rapid / long term response.</p> <p>Ineffective communication and co-ordination of volunteers to respond quickly to an unplanned event.</p>	<p>The draft letter to be considered in discussion with the Perm Sec and DGs will place responsibility on Directors and Deputy Directors to identify posts within their Department, with key roles to play in emergency planning and response and will ensure this is recognised in their job descriptions, assessed against this role under the Performance Management process and that training is provided to fulfil their roles effectively. Departments will be asked to ensure that, where required, resources are released appropriately to deal not only with the response but also to engage in the longer-term recovery process.</p> <p>The Team has purchased a web-based BT Text Messaging system which will be operational from June to send text messages to all volunteers where the ECC(W) is activated in response to an emergency.</p>	<p>Reg Kilpatrick</p> <p>Name Redacted</p>	<p>June 2018</p> <p>June 2018</p>

5 AUDIT FINDINGS/OBSERVATIONS AND ACTION PLAN					
Ref	Finding / Observation	Risk / Impact	Agreed Action	Owner	Date
Significant Findings/Observations					
3.	Communication and Co-ordination We reviewed mechanisms of communication between policy departments to ensure they are operating as intended and that the forthcoming transfer of functions is being communicated effectively across WG. There are two internal forums; Civil Contingencies Group (CCG) and Resilience Steering Group (RSG). The CCG brings together a focused Group of senior officials to discuss strategic issues of emergency planning and response across WG. It manages the activation of an emergency response. The RSG supports the CCG in providing good communications and support to the ECC(W) during an emergency and assists the CCG in facilitating the recovery and regeneration process following emergencies. We identified the following issues: <ul style="list-style-type: none"> • The terms of reference for both groups were outdated, including the core membership details. • The chair of the CCG had previously written out to senior officials from policy departments highlighting the importance of attending the group and requesting confirmation of membership. However, there had still been a lack of senior official attendance at the CCG. This meant the CCG was often attended by deputies also attending the RSG, resulting in duplication across the two Groups. • Many policy leads were not in attendance at the groups and were not included on the core membership list. • Some policy leads highlighted that the agenda was broad in nature and often not relevant to them, which could have contributed to the lack of attendance. 	Lack of appropriate engagement between members could lead to ineffective communications and resilience risks not being appropriately addressed by policy departments. Key messages may not be effectively communicated to all relevant parties.	The Terms of Reference for both groups will be revisited to provide more detail around the roles and responsibilities and to agree a clear purpose and differentiation between the two groups. A process will be put in place to review these on an annual basis. The draft letter to be considered in discussion with the Perm Sec and DGs will ensure that Senior Civil Servants, who have policy responsibilities which include emergencies, attend the corporate Civil Contingencies Group to ensure there is cross-Government engagement on civil contingencies matters. There will be a requirement for Executive Bands to attend the Resilience Steering Group. Attendance will be monitored regularly and reported to the Perm Sec and DGs.	Name Redacted	July 2018
				Reg Kilpatrick	June 2018
			Departments will be asked to take some responsibility for setting the agenda for these meeting to ensure they remain relevant for all.	Name Redacted	July 2018

5 AUDIT FINDINGS/OBSERVATIONS AND ACTION PLAN					
Ref	Finding / Observation	Risk / Impact	Agreed Action	Owner	Date
Significant Findings/Observations					
4.	<p>ECC (W) Maintenance & Up-grade</p> <p>The Resilience Team is responsible for the management and upkeep of the ECC (W). The budget for its maintenance and upgrade is held corporately.</p> <p>Whilst we recognise that there is a process in place for requesting ICT equipment, through WG's policies and procedures, there is no maintenance policy or a programme of equipment upgrades. If this was in place, this would help to identify specific costs, clear lines of authority and priority for the Resilience Team to utilise budgets for updating existing equipment and / or requests for new technologies.</p> <p>In addition, in terms of wider IT functionality, the Resilience Team experienced connectivity problems with the WG network during the recent adverse weather conditions which, potentially would have prevented them from effectively responding to any emergencies whilst home working.</p>	<p>Unable to keep pace with advances in technologies and communications to respond effectively to emergencies.</p> <p>Lack of availability of IT to support the emergency response.</p>	<p>The Resilience Team will re-visit the accommodation and ICT requirements both in terms of the physical and virtual needs of ECC(W). Discussions will be held with the Chief Digital Officer, ICT, Facilities and EPS Operations Team on establishing a dedicated budget for an ongoing upgrade and maintenance programme for the ECC(W) to ensure it remains fit-for-purpose and resilient.</p> <p>The Corporate Business Continuity Team is producing a list of users to have priority access to the Stratus service in the event of a disruption. The problems encountered by the Team in terms of access during the recent severe weather played a part in the Business Continuity Steering Group's decision to produce a list of priority users.</p>	<p>Wyn Price</p> <p>Name Redacted</p> <p>Wyn Price</p>	<p>September 2018</p> <p>June 2018</p>

5 AUDIT FINDINGS/OBSERVATIONS AND ACTION PLAN				
Ref	Finding / Observation	Risk / Impact	Agreed Action	Owner
Merits Attention Findings/Observations				
5	<p>Mechanisms to identify & sustain resources for corporate response</p> <p>At present there is variety of training in place for volunteers which includes exercises, e-learning, workshops and hot shot sessions. However, there is no minimum training programme and the Resilience Team have no ability to mandate training.</p> <p>As part of a new approach to train and utilise volunteers which is being developed by the resilience team, all volunteers have been contacted to reaffirm their commitment to remain as a volunteer. The new approach will see the establishment of smaller, skilled volunteer teams who will operate the ECC (W), independent of the resilience team. The approach will be piloted in December 2018 and will include a training and development programme for the dedicated teams. We consider the following important in its development:</p> <ul style="list-style-type: none"> • Training needs - requirements for different groups of individuals e.g. Volunteers, resilience team, policy leads, WGLOs, SCS and specialist roles; • Methods of delivery - including identifying the type of training and support required e.g. face to face, e-learning, specific targeted training for specific skills or emergencies, exercising; mandatory vs optional. • Training schedules to refresh & confirm the level of commitment and ensure all volunteers are utilised and remain practised in emergency responses, regularly update training materials to ensure they remain relevant. • The level of support available for staff during and after an event e.g. counselling. 	<p>Insufficient resources and available expertise to manage and respond to emergencies.</p> <p>Lack of uptake and provision to enforce training for ECCW which could impact on the ability to respond to unplanned / planned emergencies.</p>	<p>The Resilience Team are developing a new training approach which will include the following:</p> <ul style="list-style-type: none"> • Bespoke ECC(W) training for dedicated teams of volunteers. • Specialist technical training for volunteer staff on all ECC(W) equipment. • A specialist WGLO training package. • Engagement of volunteers in external planning meetings and exercises/training. • Establishing a working group of volunteers to agree training needs and methodology. 	<p>Name Redacted</p>
				Dec 2018

5 AUDIT FINDINGS/OBSERVATIONS AND ACTION PLAN				
Ref	Finding / Observation	Risk / Impact	Agreed Action	Owner
Merits Attention Findings/Observations				
6	<p>Lessons Learned</p> <p>Lessons learned are co-ordinated by the Resilience Team on a lessons learned log following major events and exercises. Policy leads contribute to this process and have ownership for some lessons identified. However, on review of the log we identified there were key fields that had not been populated. Specifically, for the UEFA Champions league the 'owner from the resilience team', 'completion date' and 'status' fields were not populated for any of the recommendations identified.</p> <p>Although lessons learned were discussed at the CCG and the RSG we could not identify a mechanism to follow up on these.</p> <p>In addition, policy leads indicated that lessons learned for specific sector emergencies were not always formally recorded and / or shared with other policy areas who may find these useful.</p>	Incomplete audit trail.	<p>Through the CCG and RSG, as well as part of training and exercising activities, Policy Leads will be asked to capture lessons which are pertinent solely to their role as Policy Leads. Any lessons which have cross-Departmental or corporate relevance will be maintained by the Resilience Team and considered, in the first instance, by the RSG.</p> <p>Gaps within the lessons learned log will be addressed.</p>	<p>Name Redacted</p>
				July 2018

AUDIT OPINION – ASSURANCE RATING

Assurance	Definition
Substantial	Arrangements to secure governance, risk management and internal control, within those areas under review, are suitably designed and applied effectively.
Reasonable	Arrangements to secure governance, risk management and internal control, within those areas under review, are suitably designed and applied effectively. Some matters require management attention in control design or compliance with moderate risk exposure until resolved.
Limited	Arrangements to secure governance, risk management and internal control, within those areas under review, are suitably designed and applied effectively. Some significant matters require management attention with moderate to high risk exposure until resolved.
None	Management has no assurance that arrangements to secure governance, risk management and internal control, within those areas under review, are suitably designed and applied effectively. Urgent action is required to address the whole control framework in this area with high residual risk exposure until resolved.

OBSERVATION CLASSIFICATION

Category	Definition
Fundamental	A weakness of control where there is a major risk of loss, fraud, impropriety, poor value for money or a failure to achieve Departmental objectives. Immediate remedial action required.
Significant	A weakness of control which, though not fundamental, could expose the system to level of significant risk. Such a risk could impact on the operational objectives of the Department and should be a concern to senior management. – Requires remedial action as soon as possible.
Merits Attention	Areas that individually have no major impact but where management would benefit from improved control and/or have the opportunity to achieve greater effectiveness and/or efficiency.

AUDIT NEEDS ASSESSMENT (ANA)

Our ANA identifies systems and activities across the Group and scores each system in accordance with four key risk areas – Financial, Reputational, Control and Inherent (explained at Annex 2). The ANA informs the audit strategy and allows us to plan ahead and concentrate our resources on the areas of greatest risk with balanced coverage across the Welsh Government directorates. Each area is scored from 1-5, giving a total maximum score of 20. The scores equate to a risk ranking of High (14-20), Medium (7-13) and Low (1-6). The purpose of these ratings is to determine the frequency and depth of future audits.

Scoring Guide

<p>Financial</p> <p>Takes into account the financial commitment of the activity. Scores could be assigned to increasing amounts e.g.</p> <ul style="list-style-type: none"> • Over £100m, and/or high level of state aid involved - 5 • Over £50m, and/or medium level of state aid involved - 4 • Over £15m - 3 • £1m and over - 2 • Below £1m - 1 	<p>Reputational</p> <p>Evaluation of the activity based on how essential delivery is and potential for WG embarrassment if errors or failure occurs. For example:</p> <ul style="list-style-type: none"> • Core activity, key PfG commitment, high media interest - 4,5 • Supporting activity, Project, medium media interest - 3 • Local system / activity, local / regional media interest only - 2,1
<p>Control</p> <p>Rating of 1 to 5 depending on what we know about the activity. Consider:</p> <ul style="list-style-type: none"> • Are there any historical or ongoing concerns or issues affecting the system / area? This could include outstanding fundamental or significant IAS (or other compliance function) recommendations that have not been implemented by their target date. • Have management raised any serious concerns to IAS or within their department regarding the area? • Have any recent inspections or compliance reviews (within 12 months), including IAS, highlighted significant or fundamental concerns regarding the operation of the system / area? • Has there been a long period since (3 years and over) area was last inspected, either by IAS or other body (WAO etc.)? • Do risks that could affect the successful operation of the system / activity appear on departmental risk registers? Consider how they have been scored and what control mechanisms have been identified. 	<p>Inherent</p> <p>Rating of 1 to 5 based on the potential for errors and misappropriations that may go undetected. Consider:</p> <ul style="list-style-type: none"> • Are the activities dependent for delivery on third parties in higher risk categories. i.e. individuals, private companies or third sector? • Are there direct payments to individuals or private companies through grant or procurement? • Are there interdependencies between different WG teams, divisions or directorates? • Is there a high number of outcomes, or is this an area which has responsibility for delivering one or more key government priorities (as currently defined by Programme for Government but this will change over successive elections)? • Is there a high volume of transactions? • Have processes / systems changed significantly over the last 12 months? • Is there a high volume / value of procurement activity? • Do laws or State Aid regulations apply that if breached would result in serious consequences for WG or stakeholders?