

**Minutes of the 53rd Meeting of the
Office for Legal Complaints Audit and Risk Committee
Monday 7 March 2022**

Members Present:

Harindra Punchihewa, Chair

Alison Sansome

Annette Lovell

Martin Spencer

In Attendance:

Elisabeth Davies, OLC Chair – observing

Paul McFadden, Chief Ombudsman

Michael Letters, Head of Finance

Laura Stroppolo, Head of Programme Management and Assurance

David Anderson, Head of IT (items 10 to 12)

Luke Hutcheson, Performance & BI Manager (item 13)

David Peckham, Operations Manager – observing

External Attendees:

Matthew Hill, CEO, Legal Services Board – observing

Ella Firman, National Audit Office

Rebecca Palmer, Deloitte

Jorjie Woodroffe, Government Internal Audit Agency

Juan Garzon, Business Partner, Ministry of Justice

Apologies:

Sandra Strinati, Chief Operating Officer

Alison Wedge, Ministry of Justice

Alex Clark, National Audit Office

Matthew Ellis, Government Internal Audit Agency

Board Secretary

Kay Kershaw

Item 1 - Welcome, Apologies and Declarations of Interest

1. The Chair welcomed all those in attendance.
2. Apologies were noted.
3. The meeting was quorate.
4. There were no declarations of interest reported

Item 2 - Previous Minutes

5. The minutes of the ARAC meeting held on 10 January were approved as an accurate record of the meeting.

Item 3 – Previous Actions and Matters Arising

6. Verbal updates were provided on the following actions:

Item 3, paragraph 8 from the January meeting: The ARAC Chair reported on a meeting had taken place with GIAA where the MoJ's 2021/22 Core Internal Audit Plan had been considered; feedback had been provided and no further items had been identified for inclusion in the plan. Considering that a new MoJ Core Audit Plan for 2022/23 would be shared with ARAC in due course, GIAA and ARAC were in agreement that this action should now be closed.

GIAA reported that some audit engagements proposed in the 2021/22 Functional MoJ Audit Plan had been postponed and may appear in the 2022/23 plan.

ACTION: The Board Secretary to close action 3 paragraph 8.

Item 4, paragraph 16 from the January meeting: Executive colleagues were currently reflecting on the strategic risk SR01 as part of their end of month review and update of risks. Consideration was to be given to whether the reputational risk of an underspend in 2022/23 had been sufficiently drawn out and clear and the risk register would be updated accordingly.

It was agreed that this action would remain on the ARAC action log for further consideration at the May ARAC meeting.

Item 9, paragraph 71 from the January meeting: The Executive reported that assumptions used for the business plan are being reviewed each month to inform business intelligence and financial forecasting.

ACTION: The Board Secretary to close action 9 paragraph 71.

7. The ARAC Chair reported that a private meeting had taken place before the ARAC meeting with Internal and External Auditors, in line with ARAC's Terms of reference. Auditors had expressed appreciation and recognition of the good work and improvements that had been made by LeO over the last year. The improvements made in the finance function were noted specifically. Auditors were

keen to ensure that single points of failure were addressed and policies and procedures were well documented to mitigate the risks associated with this.

8. ARAC noted the update on previous actions and matters arising.

Item 4 – Risk Assurance Review

9. Head of Performance Management and Assurance (Head of PM&A) drew ARAC's attention to the following key points:

- A Risk Manager had been appointed and would start in post on 11 April 2022.
- Business Performance reviews were currently being undertaken in line with LeO's standard month end process. Risks would then be updated in preparation for discussion at the next Executive Team meeting where further consideration would be given to the strategic risk SR01 and the reputational risk associated with any potential underspend in 2022/23.
- The score for SI03 remained unchanged because of continuing corporate recruitment challenges. The Head of PM&A reported on plans to test regional recruitment markets and then utilise LeO's hub strategy if regional recruitment was successful. The score for this strategic issue would be reduced subject to successful recruitment and the stabilisation of attrition.
- As part of an ongoing Internal Audit on Change and Transformation, GIAA would be testing strategic risk SR02. This risk score would be reviewed once GIAA had confirmed the audit rating. A change and transformation communications plan had now been approved.
- The score for SR03 remained unchanged. The Head of PM&A reported on plans to remove all Covid restrictions in LeO's office; the Government's Covid guidelines would continue to be followed. HR support would be available on a case-by-case basis for staff deemed clinically vulnerable, or those caring for someone clinically vulnerable. The Head of PM&A would be recommending to the Executive that this risk score was reduced.
- A business unit risk relating to Operational transformation and third-party suppliers was to be escalated to the Executive.
- Mitigations to reduce the business unit risk associated with the absence of a Team Leader in the External Affairs Team were having a positive impact. To better support internal and external communications, the Internal Communications Manager and Stakeholder Engagement Manager regularly meet with the CO monthly Executive Team meetings with the CO now attending External Affairs Team meetings.
- Risk appetite measures and the assurance mapping framework were being reviewed and developed for presentation at the ARAC meeting in May.

- Four Internal Audit actions remained overdue in line with previous ARAC updates. All other internal Audit actions were on track to be closed within agreed deadlines.
- The completion of two overdue actions relating to the audit of Financial Management were dependent on information on principals for ALBs on procurement policy being received from the MoJ. The Executive has raised with the MoJ about the delay in receiving this information and brought to their attention the implications of this on LeO's ability to procure goods and services.
- GIAA had agreed that the Case Progression audit action should be closed. The completion of this action had been delayed because of IT resourcing and it has now been agreed that the feasibility report and the associated links to CMS would now form part of the MI and BI project commencing in Q1.
- Field work had commenced for the Change and Transformation audit.
- GIAA and the Executive had continued discussions on the 2022/23 Internal Audit plan.

10. ARAC had been pleased to note the appointment of a Risk Manager and that a review of risks, risk measures and assurance mapping was underway in preparation for further discussions at the ARAC meeting in May.

11. In discussion, it was recommended that as part of the risk review, a more detailed breakdown of the strategic risk SR01 and the mitigating actions was provided; this would help ARAC to check the impact of the mitigating actions.

ACTION: The Head of PM&A to arrange for a more detailed breakdown of the strategic risk SR01 and the mitigating actions to be provided to ARAC.

12. The Head of PM&A reported that the Risk Manager would be testing the risk controls at the end of Q1 / beginning of Q2, with a view to providing greater assurance on risk to the Executive and ARAC.

13. It was suggested that consideration should be given to including a cyber-attack risk on the strategic risk register. In response, ARAC was advised that cyber security was already captured as an IT business unit risk and this risk was kept under regular review. LeO had recently been required to report on the robustness of its cyber security measures to the MoJ. The Head of PM&A agreed that the Executive would give further consideration to whether the cyber-attack risk should be escalated to a strategic risk.

ACTION: The Executive to consider whether the IT business unit risk relating to a cyber-attack should be escalated to the strategic risk register.

14. The ARAC Chair advised that the Committee expected to see the score for S103 reduce following the appointment of key corporate staff and a large number of other staff mainly investigators joining the organisation following large operational recruitment campaigns. In circumstances where the score remained unchanged, ARAC would expect to receive an explanation of why the score hadn't reduced.

15. A typographical error was identified on page 4 of the Risk Report; the residual risk rating referred to in the penultimate column related to Q4 2021/22 and not Q2 2021/22.

16. The ARAC Chair stated that he was keen to ensure that all Internal Audit actions were completed within the agreed deadline. When barriers were encountered that prevented actions being completed, as happened with the action arising from the Casework Compliance audit, the Executive was asked to ensure that alternative ways of completing the actions were identified. This would prevent an additional risk arising from the failure to complete the internal audit action.

17. Acknowledging the point made by the ARAC Chair, the CO advised consideration would be given to finding alternative ways to completing audit actions wherever possible. The Executive had considered utilising alternative resource from within the business to complete this audit action, but this would have had implications on operational performance. On balance, it had been decided that the risk to performance outweighed the risk of not completing the audit action.

18. The ARAC Chair sought assurance that the Executive was in control of the risks associated with the imminent departure of two members of the IT Team, enquiring whether there were adequate mitigations in place and whether the associated business unit risks would need to be escalated. In response, the CO confirmed that there was a succession plan in place to mitigate the risks associated with the departure of these members of staff.

19. ARAC **noted** the update on the Risk Assurance report and thanked the Head of PM&A for the clear and well-structured Risk Assurance paper.

Item 5 – Internal Audit update

20. GIAA drew ARAC's attention to the following key points:

- The Audit of Performance Reporting had completed, receiving a moderate audit rating. Some low and medium priority recommendations had been made, which included a periodic review of performance metrics to ensure that they aligned to strategic objectives and ensuing performance metrics on the agreed data set were supported by general technical notices.
- The audit report for the Recruitment audit was in draft, pending management actions.
- Fieldwork had commenced for the Finance (payroll) and Change and Transformation audits.
- GIAA remained on track to deliver the 2021/22 audit plan.

21. Considering that two audits were still in the fieldwork stage, one final audit report was still in draft, and that final audit reports would therefore not be presented to ARAC before year end, the Executive sought clarity on when GIAA would share its Annual Audit Opinion, what opportunity ARAC would have to discuss it, and whether

there would be any adverse impact on the timetable for the production of the 2021/22 Annual Report and Accounts.

22. In response, GIAA advised that all remaining audits would be completed by year end and final audit reports would be presented to ARAC, along with the draft Annual Audit Opinion at its meeting in May.

23. Concerned that ARAC may have insufficient time for a detailed discussion on this at the May meeting, and considering the concerns that had been raised regarding the very limited time given for ARAC to discuss and understand the rationale for last year's Annual Audit Opinion, the ARAC Chair requested that the remaining final audit reports and the draft 2021/22 Annual Audit Opinion were circulated as soon as possible outside of committee ahead of the May; this would maximise the time available to review beforehand, enabling a detailed discussion at the May meeting.

24. In response, GIAA confirmed that the final audit reports for the Finance (payroll) and Change and Transformation would be shared with the Executive for circulation to ARAC in early April and the draft 2021/22 Annual Audit Opinion would be shared with the Executive for circulation to ARAC in mid- April to allow ARAC sufficient time to consider the information ahead of the May ARAC meeting.

ACTION: GIAA to circulate the final audit reports on Finance (payroll) and Change and Transformation to the Executive in early April and share the draft 2021/22 Annual Audit Opinion with the Executive in mid-April.

ACTION: The Executive to arrange for the final audit reports on Finance (payroll) and Change and Transformation and the draft 2021/22 Annual Audit Opinion to be circulated to ARAC upon receipt.

25. It was agreed that feedback from the Executive on audit reports and the 2021/22 Annual Audit Opinion would be provided to GIAA by email in time for GIAA to finalise the final report for submission to ARAC in May.

ACTION: The Executive to provide feedback on the final audit reports (Finance (payroll) and Change and Transformation) and the 2021/22 Annual Audit Opinion in good time for GIAA for finalise the reports for circulation to ARAC members in advance of the meeting in May.

26. In response to a request for clarification of the action required in response to recommendation 3.1 set out in the Performance Reporting Audit report, GIAA explained that Auditors recommended that further consideration was given to the way data within the Agreed Data Set was presented to maximise how it was used.

27. How LeO used the Agreed Data Set in terms of decision making had fallen outside of the scope for the Performance Reporting Audit. It was suggested that this could be included in the 2022/23 Internal Audit plan. In response GIAA explained that further improvements were planned by LeO regarding the way performance data was captured and used therefore any further audits would need to be undertaken after the planned improvements had been made.

28. GIAA presented the draft Internal Audit Plan for 2022/23, which had been developed in discussion with the Executive. Six audit themes had been identified in

line with LeO's current risk profile: Budget and Business Plan; Service Complaints; Staff Complaints and Grievances; GDPR and Information Assurance; Risk Management Framework, and Performance Management Framework.

29. Other areas of audit focus had been considered (Expenses; Learning and Development; Diversity and Inclusion, and Cyber Security) but had been re-prioritised due to the size of the proposed 2022/23 Audit Plan.

30. A longer-term audit plan setting out the areas of audit focus over the next three years had also been identified.

31. ARAC was advised that there was an element of flexibility within the proposed 2022/23 Audit Plan to allow GIAA to respond to any changes in organisation and its risk profile throughout the year.

32. In response to the proposed 2022/23 Internal Audit Plan, ARAC made the following comments:

- The HR policies linked to the Performance Management Framework should be included within the scope of the Performance Management Framework audit.
- An audit of Performance Reporting (making best use of performance reports for decision making and action planning) should be added to a reserve list of audits for 2022/23.
- An audit on the Quality of casework should be added to a reserve list of audits for 2022/23.
- Consideration should be given to merging the longer-term Audit Plan with the reserve audit list.
- It would be important to consider the timing of audits to ensure that they added the most value to LeO's continuous improvement journey.

33. Acknowledging ARAC's feedback, GIAA reported that the 2022/23 Audit Plan could be updated to reflect that the HR policies linked to the Performance Management Framework should be included within the scope of the Performance Management Framework audit and, if required, it would be possible to merge the longer-term audit plan with the reserve audit list and highlight the priority audits that should be undertaken earlier if scheduling allowed.

34. The CO drew ARAC's attention to the significant changes to the business process that were expected in response to the proposed Scheme Rule Changes and the imminent review of the Quality Framework. Recognising the strong rationale for including an audit on the Quality of Casework, the CO **agreed** that the Executive consider whether this audit would add most value if it was undertaken before, or after, the Scheme Rules changes and Quality Framework review and feedback to GIAA accordingly.

ACTION: The Executive to consider whether an audit of the Quality of Casework would add most value if it was undertaken before or after the

Scheme Rules changes and Quality Framework review and feedback to GIAA accordingly.

35. Considering the planned improvements to performance reporting, which included the use of Power BI, the CO also **agreed** to consider when an audit of Performance Reporting (part 2) would best be undertaken to add most value to the organisation and feedback to GIAA accordingly.

ACTION: The Executive to consider when an audit of Performance Reporting (part 2) would add most value to the organisation and feedback to GIAA accordingly.

36. Following a detailed discussion, ARAC **agreed** to the proposed 2022/23 Audit Plan as presented, subject to:

- The 2022/23 Audit Plan being updated to reflect that the HR policies linked to the Performance Management Framework should be included within the scope of the Performance Management Framework audit.
- Audits on Performance Reporting Part 2 (making best use of performance reports for decision making and action planning) and Quality of Casework being added to a reserve list and the timing of these audits being planned so that they added best value to the organisation.
- A degree of flexibility being incorporated into the Audit Plan to allow for audits to be rescheduled in response changes in risk profile during the year, as required.

37. ARAC **noted** the update from Internal Audit.

Item 6 – External Audit Update

38. External Auditors presented the audit planning report, advising that significant progress had been made on audit planning and the assessment of risk for the 2021/22 Financial Statements Audit. The following key points were made:

- Management override would continue to be a significant risk. This was consistent with previous audits and was a presumed risk.
- The risk associated with the accounts production had been downgraded to area of focus. This was because of the significant improvements that had been seen in the accounts production in 2020/21.
- IRFS 16 continued to be an area of focus; this was because it would be the first year of implementation and adoption.
- Board member expenses was no longer highlighted as a risk.
- Revenue was not considered to be an area of significant risk.
- Materiality had been identified as £270,000 (2% of gross expenditure) with an error reporting threshold of £5000.

39. In response to inquiries made by Auditors, ARAC members stated that:

- They had no awareness of any suspected or actual fraud.
- They had no awareness of any non-compliance with laws and regulations (including regularity).
- They had no awareness of any other areas of focus to be included in the 2021/22 Financial Statements audit, other than those already identified by Auditors.
- They had no additional risks for inclusion in the audit and confirmed that the risks highlighted in the audit planning report were the key risk areas that they had expected to see included in the audit.

40. Auditors reported that the main audit work would commence on 9 May 2022.

41. The Executive confirmed that a clear project plan was in place to support the production of the Annual Report and preparatory work had been undertaken to support the 2021/22 Financial Statements Audit.

42. ARAC **noted** the External Audit update.

Item 7 – Annual Report & Accounts Update

43. The Head of Programme Management and Assurance updated ARAC on the progress being made on the 2021/22 Annual Report and Accounts, drawing ARAC's attention to the following key points:

- A planning meeting had taken place with External Auditors on 4 May to discuss the audit timetable and how it would align to the internal Annual Report and Accounts project plan.
- The Financial Statements audit would commence on 9 May and a three-week audit plan had been agreed.
- On 30 June, ARAC would be meeting to assure the 2021/22 accounts ahead of a Board meeting later that day where the Board would be asked to approve the 2021/22 Annual Report and Accounts.
- It was likely that the Annual Report and Accounts would be laid in Parliament on 14 July. This would allow sufficient time for the Board to provide out of committee approval in the event of not being able to approve the Annual Report and Accounts at the Board meeting on 30 June.
- The Annual Report project kick off was launched internally on 28 February; work has since been commissioned, a brief was issued for the procurement of design work, a main drafter was appointed.
- This production of the Annual Report and Accounts would be managed in line with a project plan.

- A summary of the internal project plan and timetable had been shared with External Auditors; this would be shared with ARAC in due course.

44. ARAC sought to understand the main thrust of the narrative to be included in the Annual Report and the extent to which Board members could influence the narrative. In response, the Head of Programme Management and Assurance advised that:

- The Annual Report would be structured in line with NAO best practice and guidance from the MoJ and would include an overview and an analysis of performance and more visual representations of key information.
- Included in the key messages would be information on the PAP reduction initiatives; the work undertaken as part of the Governance and Contracts project initiatives; information of the work undertaken to refresh internal policies.
- ARAC was to review the draft accounts at its meeting in May. The Board would have sight of the draft Annual Report and Accounts at its meeting in May; this would also include a financial commentary; a Governance statement and a re-numeration statement.

45. In discussion, ARAC reflected on the need to ensure that the key messages within the Annual Report were aligned to the key strategic objectives set out in the Business Plan, and that the improvement journey and the progress made during the year was highlighted and balanced against the challenges that remained.

46. Auditors advised that the Annual Report's Governance statement should set out the key risks during the last year and the mitigating actions that had been put in place to address them. Auditors had asked for the Governance Statement to be available to them for the start of the audit.

47. ARAC **noted** the update on the Annual Report and Accounts.

Item 8 – Financial Governance

48. The Head of Finance reported on the full year financial forecast underspend against budget and other key financial reporting as at January month end. ARAC's attention was drawn to the following key points:

- The forecast was updated each month.
- Adjustments had been made to forecast to reflect an updated position on legal provision assumptions.
- Case fee debtors were stable and low.
- Payment to creditors was mainly being made within 28 days.
- Work being undertaken by the Finance Team for the audit of 2021/22 Financial Statements was aligned to the overall Annual Report and Accounts timetable.

49. Reflecting on the new 2022/23 budget, ARAC had been keen to understand whether the preparation of budget forecasts had highlighted any potential risk of underspend. In response, the Head of Finance reported that:

- The 2022/23 budget had not yet been agreed.
- Once agreed, the budget would be phased; any potential underspend would most likely be a timing issue.
- The Executive would seek to mitigate any potential staffing underspend with additional recruitment; the assumptions for mid-year recruitment would be modified accordingly.
- There will be several corporate vacancies that will impact Q1 which will use up the increased vacancy factor.
- Currently there was nothing to suggest that there would be an underspend, or overspend, in 2022/23, but there would be ample opportunities to take appropriate mitigating action in the event of an emerging underspend or overspend being identified during the year. This will be reported as part of the forecast.

50. ARAC **noted** the update on financial governance.

Item 9 – Attestations & Single Tenders

51. ARAC noted that there were no single tenders or attestations reported for January or February 2022.

Item 10 - Information Rights and Security Incidents Report

52. The Head of IT presented the Information Rights and Security Incidents report, drawing ARAC's attention to the following key points:

- The number of information rights and security incidents remained low and stable and no emerging trends had been identified.
- The information security protection regime remained proportionate and effective and no emerging security threats had been identified.

53. ARAC raised concern that the number of security incidents arising from the use of an incorrect recipient email address was not reducing and suggested that further action should be considered to mitigate the risk of sensitive data being sent to the wrong recipient. In response, the Head of IT reported that:

- The number of emails sent to incorrect recipients was low and had remained stable over the last two years.
- Benchmarking had been undertaken and the number of emails sent by LeO to the incorrect recipients was broadly in line with other similar organisations.

- The current number of incidents was considered proportionate to the risk.
- The mitigating actions in place to reduce the number of incidents was proportionate. Mitigating actions included the auto populate function in outlook being disabled and training provided to all staff on the actions required to prevent emails being sent to incorrect recipients; new starters received this training as part of their induction.
- The number of incidents was closely monitored. Action would be taken in response to any new trends identified.
- There would be a cost associated with any further interventions to reduce the number of incidents, both in terms of the impact on staff time and changes to systems and processes.

54. Reflecting on this, ARAC sought to understand what feedback was provided to staff who had sent an email to an incorrect recipient and what individual and organisational learning was captured because of this.

55. In response, the Head of IT **agreed** to ensure that future Information Rights and Security Incidents Reports included information on the feedback provided to staff who had sent an email to an incorrect recipient and what individual and organisational learning had been captured because of this.

ACTION: The Head of IT to ensure that future Information Rights and Security Incidents Reports included information on the feedback provided to staff who had sent an email to an incorrect recipient and what individual and organisational learning had been captured because of this.

56. Following discussion, the ARAC Chair recommended that the Executive gave further consideration to what additional, proportionate, interventions could be introduced to reduce the number of emails being sent to incorrect recipients.

ACTION: The Executive to consider that that additional, proportionate, interventions could be introduced to reduce the number of emails being sent to incorrect recipients.

57. Referring to information set out in the Q4 non-breaches section of the Information Rights and Security Incidents report, ARAC sought clarity on whether Rule 39 applied to LeO. In response, the Head of IT agreed to make enquires from the Data Protection and Information Compliance Officer and report back to the Committee.

ACTION: The Head of IT to make further enquires on whether Rule 39 applied to LeO and report back to ARAC.

58. ARAC **noted** the Information Rights and Security Incidents Report

Item 11 – Annual DPA Mandatory Training Compliance Report

59. The Head of IT reported that 244 of the 278 staff at LeO, had completed the mandatory DPA training in 2021/22. Of the 34 staff that had been unable to complete the training, the majority had now left the organisation, whilst others were on long term sick leave, maternity leave or had had system issues. Currently, 10% of staff had not completed the training and action was being taken by managers to ensure compliance.

60. ARAC raised strong concerns about the 10% of staff that had not complied with this mandatory training. Commenting the response rate was not acceptable and that 100% compliance was expected, ARAC stressed that managers should give a clear message to staff that completing this training was required.

61. Considering that the year-end was approaching, the ARAC Chair suggested that an amnesty was given to those staff who had not completed the training in 2021/22 on the understanding that they were required to complete it in April 2022/23 along with all other staff. In any case to set a clear deadline for all staff to complete the mandatory training was suggested.

62. ARAC **noted** the DPA mandatory training compliance report.

Item 12 – Annual Review of Business Continuity

63. The Head of IT reported on the progress that had been made on Business Continuity.

64. ARAC was advised that GIAA audit of the revised Business Continuity Plan had received a substantial rating. Some minor recommendations had been made, the majority of which had been actioned in Q3, with the remaining actions on target for completion in line with the action plan.

65. Business Continuity training and rehearsals had been scheduled for 2022/23.

66. ARAC was advised that the Head of IT who would be leaving LeO at the end of March. A new IT Manager was to be appointed to replace the IT Development Manager who had also recently led the organisation. The IT Manager would lead on Business Continuity, but in the intervening period until their appointment, existing staff would be responsible for this.

67. The ARAC Chair thanked the Head of IT for his hard work and commitment and wished him well for the future.

68. ARAC **noted** the Annual review of Business Continuity.

Item 13 – Annual Data Assurance Report

69. ARAC was advised that the focus on data assurance had changed since the last Data Assurance report was last presented to ARAC in 2021.

70. Since then, improvements had been made to the operational data assurance framework, this included the development of a new forecasting model, underpinned by business assumptions effecting productivity within operations. Assumptions were now reviewed monthly in collaboration with Operations, Finance and HR to ensure the accuracy of the ongoing forecast and to provide greater assurance of assumptions and performance data presented to the Performance and Quality Task and Finish Group and the Board.

71. With this work now incorporated into BAU, the focus had moved to digital reporting using Power BI and the integrity of data within the data warehouse. A Power BI Developer would be commencing in role at the end of March to focus on creating an automated and accessible reporting function within Power BI. They would work closely with the Business Intelligence /SQL Specialist to connect data within LeO's existing data systems to Power BI and to assure its accuracy.

72. The ARAC Chair was keen to understand the outputs from Power BI and when to expect them. In response, the Business Intelligence reported that:

- A first draft of the KPI wireframe had been shared with the Board at its workshop in February and a second draft was to be shared in March.
- Underpinning the wireframe was a range of lower-level reporting that fed into the Agreed Data Set. The same process would be used to create the front-end dashboards in Power BI.
- In preparation for this, a prioritisation exercise would be undertaken to look at the lower-level reporting to identify what was required to feed into the KPI dashboards that would replace the Agreed Data Set.
- It would be necessary to run the old and new data systems in parallel for a while, but once the Agreed Data Set had been incorporated into Power BI, the Agreed Data Set could be switched off.
- It was expected that all reports would be incorporated into Power BI within the first 6 months of the new financial year, with a deadline of 30th of September 2022.

73. In response to a question raised, the Business Intelligence Manager confirmed that the data in Power BI would be presented in the form of a high-level dashboard with options to drill down to interrogate the data sitting beneath it.

74. The OLC Chair advised she would be following up with colleagues at the LSB and MoJ to ensure that the revised performance reporting package worked effectively for all parties.

75. ARAC had been pleased with the progress being made on delivering the improvements to data reporting and how it had been articulated on the Data Assurance paper presented to the Committee.

76. ARAC **noted** the Annual Data Assurance report.

Item 14 – Annual Health & Safety Policy

77. The Head of PM&A reported that a revised Health and Safety Policy had been reviewed by RemCo at its meeting in February. In response to RemCo's feedback, guidance on managing the Health and Safety of remote workers had been produced; this was intended to be read alongside the revised Health and Safety Policy.

78. The guidance on managing the Health and Safety of remote workers and the revised Health and Safety Policy had since been circulated to RemCo out of Committee for approval. One member of RemCo had confirmed their approval of the documents and responses were awaited from other members of the committee.

79. As a member of RemCo, Alison Sansome confirmed her approval of the Health and Safety policy.

80. RemCo had also recommended that consideration should be given to whether the Health and Safety policy should be updated to include information on managing the Health and Safety of staff working in regional hubs. Having reflected on this, it was decided that a decision would be made once the regional hubs were in place, when there would be more clarity on whether LeO's staff would be covered by the Health and Safety policies in place by the organisations hosting the hubs. Any updates to the Health and Safety policy and the supporting guidance would be undertaken as required.

81. ARAC recommended that both the Health and Safety Policy and the Remote Working Guidance are reviewed to ensure clarity on what was policy and what was guidance and to make sure consistent use of language across both documents.

ACTION: The Head of PM&A to arrange for the Health and Safety Policy and the Remote Working Guidance to be reviewed to ensure clarity on what was policy and what was guidance and to ensure the consistent use of language across both documents.

82. The updated documents will be circulated to ARAC for approval.

Item 15 – Any Other Business

83. At the January ARAC meeting, the OLC Chair had advised the Committee that the next letter updating the MoJ Permanent Secretary on financial governance and risk management would be issued at the end of February. Since then, there had been several contacts with the MoJ and it had been agreed that the next letter to the Permanent Secretary would be issued after the March ARAC meeting instead.