



STAFFORDSHIRE FIRE & RESCUE SERVICES

Driver Training

Internal audit report 1.23/24

REVISED FINAL

22 November 2023

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1. EXECUTIVE SUMMARY

Why we completed this audit and background

An audit of Driver Training was undertaken at Staffordshire Fire & Rescue Service, following a specific additional request by Management, as part of the internal audit coverage for the 2023/24 financial year.

The Fire & Rescue Service has a minimum number of officers who have passed the Emergency Fire Appliance Drivers (EFAD) examination per station (on average 4-6). However, the number of trained officers may not be equally allocated across the shift patterns. The Service is struggling to encourage people to complete the necessary driver training and therefore have experienced a reduced number of trained drivers in recent years.

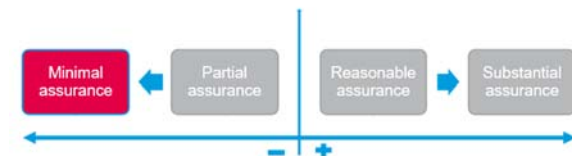
Conclusion

Throughout our audit, we identified significant issues relating to managerial leadership and visibility for driver training. Our testing identified exceptions across basic controls regarding the completion of mandatory license checks (used to inform of any disqualified drivers), recording training documentation and effective visibility of retiring officers to inform future demand needs. In order to improve and obtain consistent levels of trained drivers across stations and shifts and to ensure it is both effective and sustainable, the control framework (both design and application) needs to be strengthened.

Internal audit opinion:

Taking account of the issues identified, the Service can take minimal assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Urgent action is needed to strengthen the control framework to manage the identified risk(s).



Key findings

We identified the following findings which resulted in the agreement of four high and six medium priority management actions:



Policy Framework

Our review of the Driver Training and Test procedures, together with the four separate training documents identified multiple documents that were in a draft format and therefore had not been approved. Documentation should be finalised and approved to confirm current processes are consistent and reflective within the documentation. **(Medium)**



Documentation Recording

We completed a walkthrough of the system with the Learning and Development lead and identified that the PDRpro system does not hold all training related records for individuals. For example, we were informed that the theory test certificates are held in a paper format in a fireproof file with no scanned copy held. All certificates and test based documentation should be transferred and held centrally and electronically to efficiently record the training status for each officer and to ensure corresponding management information can be easily produced and reported. **(High)**



Record of Retirement

There is currently no process or mechanism in place to identify or inform the number of drivers who are likely to retire within the next three years. This will provide the opportunity to prepare and prioritise those teams and resources that will potentially be impacted by the retirement of trained drivers. **(Medium)**



KPI Reporting

A set of KPI's should be developed to ensure the Service can track and monitor their achievement in the completion of mandating the Large Goods Vehicle (LGV) and Emergency Fire Appliance Driving (EFAD) effectively. **(Medium)**



Reporting of Driver Training Status

There are monthly Emergency Response Team (ERT) meetings, which are minuted and a monthly action log is updated. Driver training is captured as part of these meetings. The updates on the status of driver training needs to be escalated in order to demonstrate oversight and scrutiny of the current and planned certified driver numbers and other driving training challenges and priorities. **(Medium)**



Mandating LGV Tests

The current issue regarding the number of appropriately trained drivers is driven by the number of officers choosing to take the driving tests. There is a need to encourage the officers to become trained drivers and therefore it would be beneficial to undertake some workshops across the locality. Across our client base it is noted that some other services ensure the requirement to complete the LGV is made mandatory for officers. Naturally with a larger number of officers qualified in the LGV there will be a larger intake for the EFAD. This will provide the Service with more choice when selecting officers to complete the EFAD. **(High)**



License Checks

The Risk Management Team perform monthly license checks using software - Continuum. The software performs license checks on all current fire service officers to confirm any license certificate they hold has not expired. In addition, the software will flag if any of the officers have received points on their license or had their license revoked since the last check. We were informed that fire service officers are mandated to provide their license details upon starting the job. However, on review of the overdue task document created by the Risk Management Team, we noted it included a list of nearly 100 officers who had either not provided or updated their information. (Of these 100 officers, not all will be driving vehicles). **(High x 1, Medium x1)**

We reviewed the overdue license detailed list and compared the names to the list of drivers who had passed the LGV and EFAD within the last 12 months. We identified five names on the EFAD list which were also detailed within the overdue license list. Furthermore, in four of these cases, the officer had not given permission for the Service to review their license and were still driving on shift, therefore until they agree and share licence details, there is a risk that the Service is unable to check the individual licensee for points or suspension and therefore there is a risk that there are drivers who should not be driving, could pose a health and safety risk to the public and a reputational risk to the service. **(High)**

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: Polices and Procedures		
Control	The Service have an established set of Driver Training procedures in place created by the Learning and Development Team. The procedures are accessible to all relevant staff via Staffnet.	Assessment: Design ✓ Compliance ×
Findings / Implications	<p>On review of the Draft Driver Training and Testing procedures dated 19 May 2022, it was noted that the purpose of the document as stated is <i>“This document details the driver training and testing arrangements applicable to Whole-time, On-Call and non-uniformed staff and volunteers where applicable”</i>. We were provided with a screenshot confirming the procedures can be accessed via Staffnet. We were provided with the following further training documentation:</p> <p>Vehicle Manoeuvres - The document was created by the Driver Training and Learner Development Team and was issued on 19 May 2023, however the document is currently in draft format. The document details the step-by-step process for planning and completing a manoeuvre, appointing a breaksperson and a banksperson and the hand signals a banksperson will use during a manoeuvre and what they indicate.</p> <p>Audible Visible Warning Devices - The document was created by the Driver Training and Learner Development Team and was issued on 23 May 2023, however the document is currently in draft format. The document details the importance of the warning devices fitted to emergency vehicles and the considerations/precautions that must be taken before using them.</p> <p>Driving Training/ Testing Procedures - The document was created by the Driver Training and Learner Development Team and was issued on 19 May 2023. The document details how officers can apply the course procedure and requirements for both LGV and EFAD.</p> <p>Emergency Response Drivers Responsibility - The document was created by the Driver Training and Learner Development Team and was issued on 19 January 2023. The procedure was approved by the Area Manager. The document details the responsibility of the drivers when dealing will different situations and environment.</p> <p>Through discussion with Management we understand that new procedure documentation is created when new technology or vehicles are brought into the Service. The Learning and Development Team will travel to the manufacturer to receive personal training. Following this a procedure document/training package is created. However, on review we identified that multiple documents were in draft form and therefore had not been finalised or appropriately approved. There is a risk that if policies/procedures are in draft that they do not reflect current practice and/or are not adhered to as they are not the finalised documentation.</p>	

Area: Polices and Procedures

Management Action 1	The Service will finalise all draft policies, procedures and training documentation, updating the version control to include approval. The documentation will be communicated and made accessible to all key officers.	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: Medium
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Area: Training

Control	The Service record all certificates, training records and any other related driver training documentation for all members on the PDRpro system.	Assessment:	
		Design	✓
		Compliance	x

Findings / Implications	<p>Through review of screenshots provided we confirmed the following information is held in each individual PDRpro profile:</p> <ul style="list-style-type: none"> • Tasks outstanding; • Requalification's (EFAD); • Core skills; • Module Competency; • Activities of Training (planner); and • Additional Training (Driving – whether they are a qualified driver or not) <p>We completed a walkthrough of the system with the Learning and Development lead and identified that the PDRpro system does not hold all training related records for individuals. For example, we were informed that the theory test certificates are held in a paper format in a fireproof file with no scanned copy held. There is a risk that accessing the documentation does not reflect an effective and efficient measure for data collection and management. All certificates and tested based documentation should be transferred and held centrally and electronically to efficiently record the training status for each officer and to ensure corresponding management information can be easily produced and reported.</p>
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Management Action 2	All training documentation and certificates should be held centrally and electronically.	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: High
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Area: Training

Control	The Driver Training Team deliver driver training efficiently making sure that they are completing as many driver training sessions as possible to the shifts and stations that need it most.	Assessment: Design ✓ Compliance ×
Findings / Implications	<p>The Service has the number of qualified drivers in accordance with the requirements outlined within the Crewing Policy. However, the drivers are not equally distributed across shift patterns. Therefore, one shift may have multiple trained EFAD and LGV drivers and another have very few. Therefore, there is a risk that shifts and/or locations may not be resourced with the appropriate number of trained drivers.</p> <p>Through discussion with the Learning and Development Manager, we were informed that the problem is not the time it takes officers to complete the training but the current uptake of service members themselves. Through discussion with the Learning and Development Manager and review of the PDRPro Timetable we recognised that the Driver Training Team are working at closer to 100% capacity between the number of trainers they have and the resources (vehicles) available, at any point in time. Therefore, it would be difficult to perform an increased number of examinations with the current level of resources/capacity.</p> <p>There is a need to encourage the officers to become trained drivers and therefore it would be beneficial to undertake some workshops across the locality to share the benefits of becoming a trained driver and the requirements that an officer will need to meet.</p> <p>Across our client base it is noted that other fire services ensure the requirement to complete the LGV is made mandatory for officers. Naturally with a larger number of officers qualified in the LGV there will be a larger intake for the EFAD. This provides the Service with more choice when selecting officers to complete the EFAD.</p>	
Management Action 3	The Service will organise workshops across the locality to share the benefits of becoming a trained driver and the requirements that an officer will need to meet to become a driver.	Responsible Owner: Martin Weaver & Tim Wareham Date: 31/03/2024 Priority: Medium
Management Action 4	The Service will make LGV a mandatory requirement for relevant officers.	Responsible Owner: Martin Weaver & Tim Wareham Date: 31/03/2024 Priority: High

Area: Strategic Aims and Goals

Control	<p>Missing Control</p> <p>The Service have a set of strategic aims or KPI's detailing how they are going to increase the intake of Large Goods Vehicle (LGV) and Emergency Fire Appliance Driving (EFAD) exams. These KPI's are regularly reported and reviewed.</p>	Assessment: Design × Compliance		
Findings / Implications	<p>A set of KPI's should be developed to ensure the Service can track and monitor their achievement in the completion of mandating the LGV and EFAD effectively.</p> <p>With no set of KPIs there is a risk that there is no oversight or focus of the key measures for delivering effective driver training.</p>			
Management Action 5	<p>KPI'S will be created to allow the Service to monitor driver training completion rates and any shortfall.</p> <p>Data analysis and resulting KPIs will be produced on a station and shift pattern basis.</p> <p>Additional training will be carried out where completion rates all below the targets.</p> <p>These KPI's will be regularly reviewed and reported.</p>	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: Medium

Area: Reporting

Control	<p>The Service record training performance information and this data is reported to management within monthly meetings.</p>	Assessment: Design ✓ Compliance ×		
Findings / Implications	<p>We were provided with the Emergency Response Team (ERT) meeting agendas for January and March 2023 (the February meeting was cancelled due to multiple members of staff on leave). On review of the papers we confirmed that driver training had been discussed at the meetings. Alongside each meeting is an action log detailing planned actions and decisions the Service intends to take, who is responsible, the due date and any progress/comments on the action since the previous meeting.</p> <p>We were provided with three months' (June, July and August 2023) email correspondence relating to performance meetings held with the Group Manager of the Learning & Development / ERT and the Learning & Development Manager. These meetings occur on a monthly basis and cover various topics, such as the current months driving test plans for EFAD and LGV tests, the forecast for the following month, and any other activities or training that will be completed in the near future. If any issues arise during these meetings, they are documented in the action log during the ERT meetings. It is important to note that the action log is not escalated further within the governance structure. This increases the risk that any issues, backlog or actions not completed in relation to driver training are not being highlighted to Senior Management.</p>			
Management Action 6	<p>Updates on the status of driver training needs to be escalated to senior management in a timely manner.</p> <p>This should include the current and planned certified driver numbers and other driving training challenges and priorities, and action being taken to address the issues.</p>	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: Medium

Area: License Check

Control	<p>The Risk Management Team complete monthly license checks in Continuum (software) to confirm that officers have not received any driving penalties.</p> <p>This report is checked by the Learning and Development Team.</p>	<p>Assessment:</p> <p>Design ✓</p> <p>Compliance x</p>
Findings / Implications	<p>The Service utilises software called Continuum. This software creates multiple reports to confirm all Service members with either Driver Status Summary or a Permit to Drive summary. It does this by completing the following driver license checks.</p> <ul style="list-style-type: none"> • CPC (Certificate of Professional Competence) expiry dates (by each driver it will detail the LGV valid dates and the CPC expiry date and individuals missing either of these will be flagged and checked); • The Service can also see if the individual has received any points on their license or if the members license has been revoked. We were informed that any change to a status of a members license will be discussed immediately. <p>We were informed that all reports are generated on a monthly basis to ensure the records are held up to date.</p> <p>We have reviewed the monthly Continuum reports entitled ‘LGV Cat expires 3 months’ and ‘Overdue Tasks’ dated 26 June 2023. We were informed that there are only two different types of overdue task – License information required and No response to driving licence information request.</p> <p>We were also informed that once the report has been produced by the Risk Management Team, the report is forwarded to the Delivery Group leads who then disseminate to the Station Managers to follow up with individuals.</p>	
Findings / Implications	<p>The Risk Management Team routinely conducts proactive checks to verify if anyone’s license has been suspended. If someone has indeed lost their license, it will result in their suspension in the system. Before any individual embarks on a training course, the driver trainers perform a standard check to ensure that their license is valid and that their photo ID has not expired. If someone has already commenced a course and arrives at a commercial license facility with an outdated or inaccurate photo, they will need to renew before continuing.</p> <p>Through discussion with Management, we established that fire service officers are mandated to provide their license details upon starting the job. However, through review of the overdue task document created by the Risk Management Team, this detailed a list of nearly 100 officers who had not provided their information. This increases the risk of an individual losing their license, the Service not being aware but the officer potentially continuing to drive appliances.</p>	

Area: License Check

This could pose a health and safety risk, a reputation risk to the service and the employee may be in breach of the law.

Furthermore, we reviewed the overdue license list and compared the names to the list of drivers who had passed the LGV and EFAD within the last 12 months. We identified five names on the EFAD list which were also detailed within the overdue license list. We also identified in four of these cases, the officer had not given permission for the Service to review their license and were still driving fire appliances on their shift. Until they agree to share their driving licence details, there is a risk that the Service is unable to check the individual's license for points or suspension. There is a risk that employees could be driving fire appliances whilst disqualified or with points on their license without the service being aware which could result in reputational damage to the service.

Management Action 7	The review of the monthly Continuum report will be evidenced and assurance sought that the Delivery Group leads and Station Managers have actioned the report.	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: High
Management Action 8	The standard checks that are completed by the driver trainers will be evidenced and recorded on Continuum.	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: Medium
Management Action 9	All officers who have not provided their driving license will be requested to provide this information immediately. All information once provided will be copied and held electronically by the service. Anyone not complying with the request may be removed from driving fire appliances. Regular management information will be presented to Senior Management of those officers who have not provided the required licence / information for further action.	Responsible Owner: Martin Weaver & Tim Wareham	Date: 31/03/2024	Priority: High

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 actions		
			Low	Medium	High
Planning, Resilience and Response	7	3	0	6	4
Total			0	6	4

* 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: INTERNAL AUDIT OPINIONS

Graphic	Opinion
	<p>Taking account of the issues identified, the board can take minimal assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.</p> <p>Urgent action is needed to strengthen the control framework to manage the identified risk(s).</p>
	<p>Taking account of the issues identified, the board can take partial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.</p> <p>Action is needed to strengthen the control framework to manage the identified risk(s).</p>
	<p>Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.</p> <p>However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).</p>
	<p>Taking account of the issues identified, the board can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.</p>

APPENDIX C: SCOPE

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

Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following objective:

Objective of the risk under review

Planning, Resilience and Response.

The audit will consider the following;

- Policy and procedures are in place
- Roles and responsibilities have been defined in the Driver Training Team
- Training specs and requirements have been developed
- Links to voluntary and mandatory training requirements
- Centralised records are maintained on training delivered
- A sample of staff members who have completed driver training in the last 12 months will be selected
- Efficiency of training delivery will be reviewed for the above
- Pipeline considerations based on strategic goals and aims are built into the training delivery model to ensure the correct number of officers possess relevant driver training
- Governance arrangements in place to monitor and manage driver training
- Management information and performance data is produced and reported

Limitations to the scope of the audit assignment:

- We will not confirm compliance with guidelines, legislation and statutory requirements;
- Testing will be completed on a sample basis
- The results of our work are reliant on the quality and completeness of the information provided to us

Our work does not provide assurance that material error, loss or fraud do not exist.

Please note that the full scope of the assignment can only be completed within the agreed budget if all the requested information is made available at the start of our fieldwork, and the necessary key staff are available to assist the internal audit team. If the requested information and staff are not available we may have to reduce the scope of our work and/or increase the assignment budget. If this is necessary we will agree this with the client sponsor during the assignment.

To minimise the risk of data loss and to ensure data security of the information provided, we remind you that we only require the specific information requested. In instances where excess information is provided, this will be deleted, and the client sponsor will be informed.

Debrief held 20 October 2023
Draft report issued 24 October 2023
Responses received 20 November 2023

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Revised Final report issued 22 November 2023

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We thank you again for working with us.

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