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Overpayments	Work Life Balance/Family Friendly Leave Schemes	Strategy, Policy & Procedures	Main Findings & Recommendations	Audit Report	Executive Summary	Contents	Circulation Control	Cover Page	Description of Document	Requester Name: Sean McCarthaigh - Audit Report Absence & Attendance Management
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		Part 1(n) of Schedule 1	Part 1(n) of Schedule 1; Section 36 (1)(b)		Part 1(n) of Schedule 1				Relevant Section of FOI Acts	sence & Attendance Management
		Outside the Scope of the FOI Act	Outside the Scope of the FOI Act; Commercially Sensitive Information		Outside the Scope of the FOI Act				Reason for Redaction	File FOI- 000225-2020
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38-43	Garda Occupational Health Service Appendix	0	······································	Part 1(n) of Schedule 1 & Section 37	Part 1(n) of Schedule 1 & Section 37 Personal Information

AUDIT REPORT



Absence & Attendance Management

May 2019

Circulation Control

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1. Executive Summary

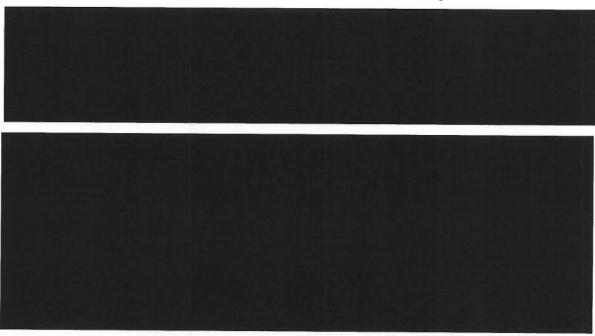
1.1 Introduction

This report represents an audit of the management and control systems in place for Absence and Attendance Management within An Garda Síochána, which forms part of a programme of audits focusing on the governance and management of HRPD within the organisation.

HRPD Directorate is responsible for the recruitment, deployment, management, development and departure of in excess of 16,000 people. This figure is set to rise to 21,000 by 2021 and with each new recruitment campaign he administration burden is increased.

The objective of the audit was to assess the strength of oversight and the robustness of management controls and procedures in place for the management of absence and attendance. The audit also focused on the adequacy of the IT systems, their outputs and the prevention of fraud.

In the course of the audit it was revealed that previous findings and recommendations are still not addressed, mainly due to the availability of resources which is currently at a critical level. It was found that sickness absence policy is the responsibility of the HR&PD Directorate but accountability and responsibility for ensuring strict compliance and enforcement of policy and procedures lies with local management.



is not being fully adhered to regarding referrals to the Chief Medical Officer (CMO) after 28 days' absence from the Division/Office. A large number

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of respondents to a survey of SAMS administrators, in Divisional offices, stated that while in "theory" staff were referred to the CMO after 28 days, in reality the wait times for a referral are not in line with the sickness policy. Following enquiries to the CMO regarding delays, the auditor was advised that there are huge backlogs due to staffing challenges in the Garda Occupational Health Service (GOHS).

1.2 Audit Opinion

Garda Internal Audit Service (GIAS) can provide limited assurance regarding the adequacy, application and effectiveness of the system of internal control employed in relation to Absence and Attendance management. This represents medium risk.

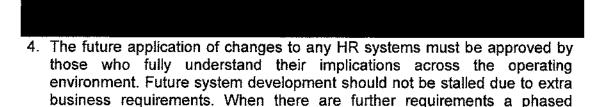
In relation to the specific audit objectives;

- We can provide no assurance that the human resources required to manage and control an effective absence management system are in place. This represents high risk.
- We can provide no assurance that SAMS administrators, managers and supervisors are supported by continuous policy review, training and development. This represents high risk.
- 4. We can provide limited assurance that the records held on both Garda Employee Management System (GEMS) and SAMS are accurate and corresponding. This represents medium risk.
- 5. We can provide limited assurance that the measurement and analysis of statistics obtained to report on absence management across the organisation are complete and accurate. This represents medium risk.
- 6. We can provide limited assurance that the records held on both SAMS and Garda members D.5 (personnel record) are accurate and corresponding. This represents medium risk.
- 7. We can provide limited assurance that HRPD are accessing and monitoring individual sickness absence to identify patterns requiring intervention and improve staff performance. This represents medium risk.

1.3 Priority 1 Recommendations:

approach should be taken.

- To ensure that HRPD are in a position to implement the following recommendations additional resources must be put in place as soon as possible.
- 2. A single integrated human resource management system needs to be put in place as soon as possible to manage absence, attendance and overpayment functions.



- 5. GIAS recommend that RDMS is rolled out nationally to digitally record time and attendance of all Garda members and staff. In order to ensure that the data recorded is providing best value it is imperative that a link is set up with the HR data warehouse and the RDMS so that Business Intelligence (BI) tools can be developed to analyse the data. An electronic interface should be developed with payroll to reduce the risk of errors in paying overtime.
- The SAMS system should be phased out as the Roster and Duty Management (RDMS) system is rolled out and fully integrated with GEMS. The hard copy SR1 form should also be phased out when all employees are using the RDMS.
- 7. Business Intelligence tools should be developed to query the GEMS system and reports should be run by HR on a regular basis to oversee the compliance and implementation of Sickness and Absence policy.
- 8. There should be one clear guidance manual detailing the obligations and responsibilities for those charged with managing sickness and absences. This document should be a living document and easily accessible on the Portal to ensure that absence is consistently reported and recorded correctly. This clarification is required for both Garda Members and Garda Staff.
- 9. Local management should be reminded of their responsibility to address sickness absence in their local policing plans and to consider disciplinary action where individuals continuously fail to comply. Regular inspections should be conducted at a local level to address sickness and absence and to allow for prompt intervention.
- 10.A review of the SAMS administrators should be undertaken as soon as possible. Only those charged with carrying out the functions should be given the title on the address book on the internal email system.
- 11.GIAS recommend that the 5/7 method used in An Garda Síochána for reporting days lost to sickness to DPER is terminated. It is not a reliable and

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- accurate method of statistical reporting. The methodology should be based on actual calendar days, working days and working hours lost. Discussions should take place with DPER in relation to finding a method that is appropriate.
- 12. Representatives from both the Finance Directorate and HR must work together to put a process in place to ensure that remittances are received from the Department of Employee Affairs and Social Protection (DEASP) outlining details of all payments. These remittances should be received in an agreed format that can be used to reconcile with both the SAMS and Bank Account.
- 13. Formal procedures and controls should be agreed between An Garda Siochána and the National Shared Services Centre (NSSC) to enable accurate exchange of data. Reconciliation procedures need to be developed and implemented as a matter of priority to identify absence and resumption dates and ascertain what payments are due for an individual claimant (of disability payments).
- 14. Regularly organised HR training days should be put in place to give HR users the opportunity to provide feedback on difficulties encountered in Divisions and Districts for recording absence so that appropriate measures can be implemented to rectify problems identified between the HR systems and processes and procedures.
- 15. The calculation of member's parental leave in terms of pay needs to be addressed as soon as possible. There is a loss to the Garda Vote as the member is not available for 10 hours duty but only losing 8 hours pay.

We have categorised these recommendations by reference to the level of risk that we found to be attributed to each (See **Appendix 1** for the categorisation used).

2 Audit Report

2.1 Background

In recent times a series of external reports and previous Internal Audit Reports has found "Governance Failures" throughout An Garda Síochána. The Garda Internal Audit Service (GIAS) is currently undertaking a series of audits to examine the governance and management of the HRPD.

The Garda Inspectorate report of the Garda Síochána 2015 (Changing Policing in Ireland) outlined key actions to include:-

"Develop a system to provide accurate attendance management data for both members and Garda staff..... "Updating sickness absence policies and guidance to simplify the management of sick leave".

These actions have also been included in the latest Garda Inspectorate report (Policing with Local Communities December 2018) and have been noted as not implemented.

HRPD Directorate is responsible for the recruitment, deployment, management, development and departure of in excess of 16,000 people. This figure is set to rise to 21,000 by 2021 and with each new recruitment campaign the administration burden is increased.

The number of whole time equivalent employees at the 30th September 2018

Garda *	13907
Reserves	544
Garda Staff **	2351
TOTAL	16,802

 ^{*} Actual number of employees (WTE not available)

Effective management of this process is crucial and relies on strong corporate governance. It is the responsibility of the HRPD Directorate to ensure that all employees of An Garda Síochána are appropriately directed and controlled to support the strategic objectives of the organisation. While operating in a tight financial environment, the HRPD Directorate must have robust processes in place to monitor and respond quickly to operational needs and risks as they arise. Pay sanctions and recent changes to illness benefits have dominated work output in this area reducing the capacity of the Sick Section to respond to operational needs and risks.

HRPD also has a responsibility to identify inefficiencies and deliver improvements in services to the organisation. Any growing organisation supported by a heavily-manual HR function will inevitably reach a point where it becomes over-worked, in turn resulting in a substandard service. If not dealt with, the impact on the organisation can be serious, especially if the organisation needs to scale quickly.

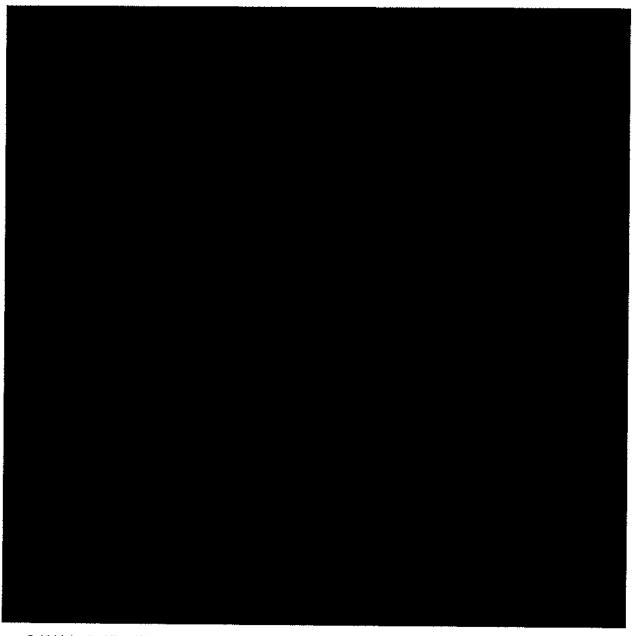
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^{**} WTE (Whole Time Equivalent)

Compliance and oversight reporting is also a major issue in An Garda Síochána and HR are currently required to provide more information without solid HR processes.

2.2 Audit Methodology and Scope

GIAS audits use a risk-based approach in accordance with the Standards for Professional Practice of Internal Audit as set out by the Chartered Institute of Internal Auditors and the Professional Standards for Internal Audit in the Irish Civil Service (DPER December 2018). This audit focused on current controls and IT structures in place for the management of absence and attendance.



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3. Main Findings and Recommendations

3.1 HR Information Systems

3.1.1 HR Management Systems

Expected Control

A Human Resource management system is in place that combines several HR functions and processes such as the recruitment process, employee data storage, payroll management, pension management and maintaining employee performance and attendance records.

Finding

There are several systems currently being utilised by the Human Resources and People Development Directorate (HR&PD).

The PeopleSoft system has been developed by the Department of Public Expenditure and Reform (DPER) and records all types of leave for Garda staff. It is also a central HR database for all HR data in relation to Garda staff. HR depend on hardcopy forms to be sent back to them so they can be accurately recorded on PeopleSoft where there is no access to this system in local offices. The KELIO clocking system is used to record absence and attendance of Garda Staff.

The Garda Employee Management System (GEMS) has replaced Garda Regional Integrated Personnel System (GRIPS) and records all types of leave for Garda members. It is also a central HR database for all HR data in relation to Garda members.

The Sickness Absence Managements System (SAMS) records sickness and days/tours lost. GEMS interfaces from SAMS nightly to extract information in relation to sick leave but the data is a day behind.

The Roster and Duty Management System (RDMS) also has a capability to interface with GEMS daily and provides some of the information SAMS provides in terms of sick records and tours lost. This is currently in pilot stage in the DMR East Division.

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Priority 1

A single Human resource management system needs to be put in place as soon as possible to manage the following HR functions. Each HR function should manage various aspects ranging from employment to retirement of employees and everything in between.

 Time and Attendance and Payroll function – this is concerned with obtaining employee attendance records and creating uploads for the National Shared Service Centre (NSSC), while taking into account deductions for social welfare benefits and unpaid leave.

Pension administration function - this should be used to track employees' pension benefits and their pension contribution with specific reference to any

unpaid leave that does not incur pension benefits.

 Training function and skills register - this offers a facility to manage and track worker training and advancement programmes. It makes it possible for the HR to monitor employee education, qualification and skills while determining the best way to train, educate and deploy them.

4. The analytics function – this enables the production of timely oversight reports and trend analysis to assist in strategic decision making on workforce planning and deployment. This in turn allows the organisation to obtain, store, disseminate and dispense employee data to different stakeholders.

 Discipline and performance function – this should enable tracking of issues, the development of training plans and a skills database through the PALF and

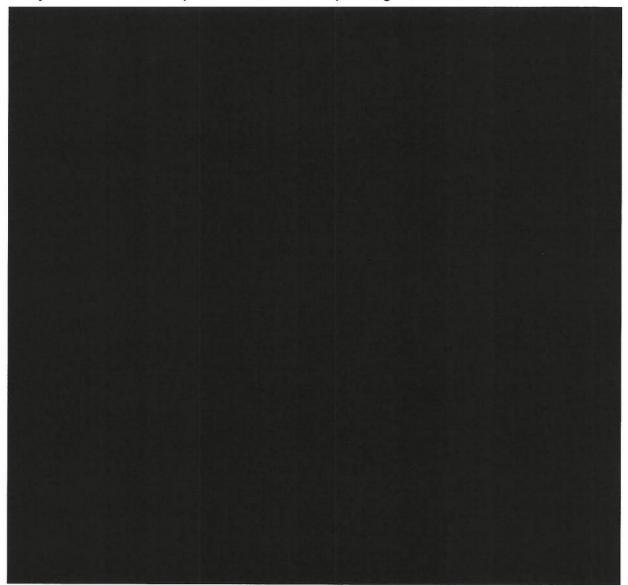
PMDS performance management systems.

6. Employee self-service function - This will enable the employees to take over some duties that are currently being carried out by HR staff. This should include employees updating their own records and querying attendance records while supervisors can view and approve or decline overtime requests from employees. Having employees check their own data will improve the integrity of the data held in HR systems.

The practice of updating two separate systems for Garda staff and members should be addressed as a priority. Only one system should be in place to record information in relation to Absence and Attendance. GIAS recommends that the RDMS system is rolled out nationally as soon as possible and SAMS is withdrawn.



The future application of changes to any HR systems must be approved by those who fully understand their implications across the operating environment.



Management Response:

Priority 1:

HR&PD fully support the recommendation of a single HRIS. In 2018 HR&PD undertook a review of HR in the context of re-designing the HR Operating Model and in this regard recommendations were made to the organisation regarding the need to scope, procure and implement a single integrated HR Information System (HRIS) to

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address the challenges faced by HR&PD and the wider organisation with regard to HR technology. Subsequently a business case to secure funding for the procurement of a HRIS for the organisation was drafted and is currently being considered. The process to secure funding, scope, procure and implement a single integrated HRIS is envisaged to be 3 to 4 years duration.



GIAS Note:

GIAS recognises that it is unlikely that the risks identified in this report in terms of a single integrated HRIS will be mitigated by the time we review this audit. GIAS suggests that the risk is added with a very high rating to HRPD Managements risk registers and escalated up through the Risk Management System.

3.1.2 SAMS System Processes

Expected Control

The Sickness and Absence Management System (SAMS) provides system controls to ensure the integrity of the data entered is reliable and reporting is complete and accurate.

Finding

SAMS has no functionality to provide system prompts to for those approaching 28/92/183 days' sickness absence. It is not clear to those managing sickness and absence locally who is responsible for alerting payroll in relation to changes in payroll following an absence exceeding 28/92/183 days.

SAMS does not have the ability to update records when a staff member moves to another section within the organisation. GIAS noted in one example that a sickness absence occurring in the individual's current section was still being recorded in the employee's previous section. The SAMS system counts weekend days into the total number of days lost to sick leave. Manual calculations are required to report the correct number of days lost.

SAMS is not relied upon by HR when probation reports are reviewed at 3/6/9 months before issuing a permanent contract.

There is no audit trail in place to identify who has created or amended a record on the SAMS system. Where issues are identified on the system, HR staff do not have the ability to follow up with the user to advise.

The survey found that 75% of SAMS users have never been contacted by HR to question any records they have created on the system. When SAMS users contacted HR with issues, 45% reported being advised to enter data that fits the system but may not be accurate. This is required to manipulate the system to ensure that correct information is recorded. The Data fields in SAMS are too rigid due to lack of system development.

For members, the SR1 is sent to the District Office for input on SAMS by the SAMS administrator. The supervisor is required to complete SR1 (Part B) on the members return to duty, this form is then sent to the District Office for updating on SAMS and filing on the members file. Excessive time spent on duplication of work has proven to increase the level of error and irregularity in the data stored as both systems are incompatible.

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60% of the SAMS administrators in Divisions/Districts who responded believe that SAMS does not accurately record shift/roster hours correctly.

72% of the SAMS administrators in Divisions/Districts reported that the required reports on non-effectiveness are not forwarded to HRPD within the required timelines.

68% of the SAMS administrators in Divisions/Districts have to perform their own checks on SR1's to ensure all absences are correctly recorded and forwarded for input, 32% say they don't perform any checks.

62% of the SAMS administrators in Divisions/Districts said no disciplinary action is triggered by the Divisional office where Med1 and IB1 (formerly MC1/2) forms are continuously not submitted by members.

Current SAMS functionality does not cover the following basic features;

- No recognition of PRSI class.
- No facility to record and receipt subsequent medical certificates and return to work forms.
- > Open absences are not automatically highlighted when the system is activated
- No way to prevent duplicate recording of absences.
- No clear instruction on when the commencement and resumption days for recording sickness absence should be, which is resulting in the incorrect number of sick days being recorded on SAMS. This was tested as part of the recent audit of the Meath Division. Records for each sample selected were cross checked to the individual's record on SAMS and GIAS noted that 4 samples on SAMS report a higher number of days absent than is recorded on the SR1/D5 (personnel record).
- GIAS also learned from testing that there is a way of identifying who has created a record on SAMS.
- > The SAMS user is not always the HRPDS user. 53% of survey respondents stated they were both SAMS and HRPDS users, 47% said they were not.
- Light duties are not recorded on SAMS.
- Data contained is basic and does not facilitate any complex analysis of trends, costs or useful management information.
- > There is no facility to look at reduced hours worked, costs and causes associated with absences, timelines on receipt of medical certificates and onward transmission.
- Statistics are not available regarding disciplinary procedures invoked in respect of sworn member's non-compliance as this is managed at local level.

Recommendations:

Priority 1

The SAMS system should be phased out as the Roster and Duty Management (RDMS) system is rolled out. The SR1 form should also be phased out when all members and staff are using the RDMS.

Business Intelligence tools should be developed to query the GEMS system and regular reports should be run by HR to oversee the implementation of Sickness and Absence policy. The use of exception reporting should be developed to identify:

- Staff out sick at 28/92/180 days
- medical certificates expiring
- repeat absences
- required referrals
- back to work reports.

Local management should be reminded to address sickness absence in their local policing plans and enforce rules to follow up on the production of medical certificates and IB1's and consider disciplinary action where individuals continuously fail to comply. It is the responsibility? of local management to notify HRPD when disciplinary procedures have been invoked.

Where the absence of medical certificates and IBI's leads to overpayments, the employee should be informed and the overpayments section should be notified immediately to arrange recoupment. As the payroll is run in advance there is an inherent risk of overpayments.

Regular reviews should be conducted at local level to address sickness and absence to allow for prompt intervention. In order to ensure accurate recording of sickness, cross checking is essential with SR1's, SAMS and the D.5 for members. This should be considered when making

Management Response:

Priority 1:

HR&PD is supportive of simplifying and unifying HR technology but understands that RDMS capability is not currently of a specification that would fully meet the needs of the organisation in respect of the overall management of leave and consequently it not possible to phase out SAMS in this circumstances.

HR&PD fully support the recommendation of a single HRIS. In 2018 HR&PD undertook a review of HR in the context of re-designing the HR Operating Model and in this regard recommendations were made to the organisation regarding the need to scope, procure and implement a single integrated HR Information System (HRIS) to

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address the challenges faced by HR&PD and the wider organisation with regard to HR technology. Subsequently a business case to secure funding for the procurement of a HRIS for the organisation was drafted and is currently being considered. The process to secure funding, scope, procure and implement a single integrated HRIS is envisaged to be 3 to 4 years duration.

Sickness Absence is managed by local managers and supervisors in the first instance. Sickness absence is centrally regulated across the Civil and Public Service and the main policy governing sickness absence is Public Service Management (Sick Leave) Regulations 2014 (S.I. No. 124 of 2014) which is available to all employees on the Portal under An Garda Síochána complies with the implementation of these regulations in respect of both Garda Members and Garda Staff. All of the sick absences are recorded on SAMS and GEMS for Garda Members and SAMS and HRMS for Garda Staff. An Garda Síochána reports on Sickness absence to DPERs on an annual basis in common with all civil and public sectors.

HRMS is required to be maintained for all Garda Staff, who are Civil Servants of the Government, and accordingly it is the HRMS data that is used at 3/6/9 and 12 month intervals for the purpose of probation assessment.

GIAS Note:

GIAS recognises that it is unlikely that the risks identified in this report in terms of a single integrated HRIS will be mitigated by the time we review this audit. GIAS suggests that the risk is added with a very high rating to HRPD Managements risk registers and escalated up through the Risk Management System.

3.1.3 Systems Development of SAMS (2)

Expected Control

All business processes and end user capability is reviewed when designing and implementing new systems.

Finding

GIAS understand that SAMS (2) was developed and tested for roll out across AGS to replace SAMS as an interim measure until a fully integrated HRPDS system was developed.

- > SAMS (2) had the functionality to capture additional data such as PPS numbers
- > Notify when medical certs are required
- Differentiate between PRSI Class A & B
- Active system prompts for SAMS users
- > Report on light duties



SAMS is the only system available at this time that captures sickness absence.

Recommendations:

Priority 1

Business Intelligence tools should be developed to query the GEMS system and regular reports should be run by HR to oversee when medical certs are required and also to report on persons assigned to light duties.

Future system development should not be stalled due to extra business requirements. When there are further requirements a phased approach should be taken. The system should be released and the further requirements developed and released in phase 2 to ensure value for money.

Management Response:

The requirement for medical certificates is dealt with under Public Service Sick Leave Regulations and monitored by local management and SAMS administrators.

HR&PD has no issue with the recommendation regarding future system development.

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3.1.4 Time and attendance - Flexi Clock

Expected Control

Effective oversight by line managers to ensure staff under their remit adhere to guidelines for the flexi clocking system.

Finding

GIAS found that Garda staff in the DMR are not using the flexi clock and have refused to record their time and attendance on the flexi system.

GIAS selected a sample to review the clocking procedures and to evaluate if controls were in place. GIAS found that flexi leave was being recorded and validated by the line manager when staff in the section were showing minus balances on their clocks. This is a loss to the vote and an infringement of flexi clock rules. There is also a risk that these staff members are in an overpayment situation.

There are no reports or KPI's produced by HR to assess whether there are infringements or abuses of the system. Any issues noted are rarely followed up with local management.

Recommendations:

Priority 2

All Garda staff across the organisation must be enrolled on the flex clock system to accurately record time and attendance.

Line managers should be reminded it is their responsibility to monitor and address clocking infringements.

Reviews of the flexi clocking system should be carried out by HR on a periodical basis.

Any issues identified should be followed up with line management.

Management Response:

An Garda Síochána must have in place provisions to enable staff to record their time & attendance and ensure compliance with the provisions of the Working Time Act. HR&PD agrees that all Garda Staff should be utilising the electronic time and attendance system to this end.

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ocal managers and supervisors are responsible, in the first instance, for ensuring dherence to Time & Attendance policy. Local managers and supervisors are enabled access reports on the electronic Time & Attendance system in respect of their direct aports.	1

3.1.5 Roster and Duty Management System (RDMS)

Expected Control

The new RDMS system, which is at pilot stage, is expected to alleviate much of the data integrity issues that are currently being experienced across every section of the organisation due to the overlap of different IT systems and the manual process of recording absence and attendance.

Finding

GIAS conducted a walk through test on the RDMS pilot scheme in the DMR East Division.

The system has the functionality to record sickness absences in the same way that the current SAMS system operates, while also recording details required for the manual A85 which records overtime and attendance and the D5 which records all leave.

Recommendations:

Priority 1

GIAS recommend that RDMS is rolled out nationally to digitally record time and attendance of all Garda members and staff.

In order to ensure that the data recorded is providing best value it is imperative that a link is set up between the HR data warehouse and the RDMS so that Business Intelligence tools can be developed to analyse the data.

An electronic interface should be developed with payroll to reduce the risk of errors in paying overtime.

Management Response:

HR&PD is supportive of this recommendation in the context of having the best possible HR data and information available to the organisation to inform decision-making, strategy and policy, having regard to the functionality specification of the RDMS being rolled out.

3.2. Strategy, Policy and Procedures

3.2.1 HR Policies and Procedures

Expected Control

Written policies and procedures governing Absence and Attendance Management are distributed to all staff, and are also easily accessible and available on the Portal. There is a process in place for HR to oversee the implementation of absence and attendance policies. HR are actively reviewing these policies and procedures to ensure they are efficient and effective.

Finding

The Absence Management Guidebook on the Portal is out of date.

SAMS administrators reported that the first place they look for assistance on how to follow procedures for managing and reporting absence in a District/Division is the Portal. Auditors carried out some initial searching on the Portal and found that the information was not easily accessible.

There was no evidence provided to auditors that HR are actively reviewing current policies and procedures to ensure they are efficient and effective.

Recommendations:

Priority 1

There should be one clear guidance manual detailing the obligation and responsibilities for those charged with managing sickness and absences. This document should be a living document and easily accessible on the Portal to ensure that absence is consistently reported and recorded correctly. This clarification is required for both Garda Members and Garda Staff.

Any circulars, directives and up to date policies on absence management should also be included in one area on the Portal. The guidance manual should be updated with any relevant changes to ensure that the policies and procedures are kept up to date in one searchable document.

Periodic reviews should be carried out centrally by HR to ensure that policies and procedures governing absence and attendance are efficient and effective.

Management Response:

Policy ownership, review, monitoring and overall governance is an organisation-wide challenge, hence the establishment of the Policy & Governance Unit to assist, advise and support Policy Owners in addressing policy issues.

The Public Service sick leave regulations 2014 came into effect at end of March 2014 and have been supplemented and amended by a number of enhancing features such as strengthening and protection of pregnancy related sickness provisions and enhancement of critical illness provisions. DPER has already conducted a significant review of the regulations since their introduction and AGS were part of and contributed to that review. All amendments and changes to sick leave regulations were communicated to and explained to all employees in the organisation by way of HQ Directives notices. Furthermore, the sickness absence management section is currently developing a number of policies that deal with supported return to work and accidental injuries, these are in response to gaps identified in the Garda Code.

Sickness Absence is managed by local managers and supervisors in the first instance. Sickness absence is centrally regulated across the Civil and Public Service and the main policy governing sickness absence is Public Service Management (Sick Leave) Regulations 2014 (S.I. No. 124 of 2014) which is available to all employees on the Portal under

An Garda Síochána complies with the implementation of these regulations in respect of both Garda Members and Garda Staff. All of the sick absences are recorded on SAMS and GEMS for Garda Members and SAMS and HRMS for Garda Staff. An Garda Síochána reports on Sickness absence to DPERs on an annual basis in common with all civil and public sectors. Previous responses regarding a single HRIS are also relevant.

HR&PD are working with the Portal Office to revise and update the Garda Staff Handbook, update the circulars library, create a new HR home page and revise/update its contents. This body of work has recently commenced and is expected to be complete by end of Q3 2019 following which the HR homepage content will be monitored and controlled centrally in HR&PD.

3.2.2 HR Administration of Absence

Expected Control

A register of SAMS users is in place and reviewed regularly by HR to ensure appropriate access controls are in place. There is a process in place to ensure starters, movers and leavers authorisation controls are updated.

Finding

In the course of the audit it was revealed that previous findings and recommendations are still not addressed, mainly due to the lack of resources which is currently at a critical level. Pay sanctions and recent changes to illness benefits have dominated work output in this area reducing the capacity of the sick section to respond to operational needs and risks.

From the survey conducted with SAMS administrators, GIAS noted that 857 people are listed as SAMS administrators. There were 57 responses from recipients of this email advising that they are not SAMS administrators.

From reviewing responses to the SAMS survey the most common issues were:

- 1. Lack of training
- 2. Users having to guess how to use the system
- 3. Issues with Garda Occupational Health Service office to get referrals
- 4.
- 5. Duplication of data entry in both PeopleSoft and SAMS
- 6. No function on SAMS to input dental or other absence certs

Recommendations:

Priority 1

To ensure that HRPD are in a position to implement the recommendations in this report additional resources must be put in place as soon as possible.

It is recommended that a fully integrated HRPD system is put in place throughout the whole organisation which can provide assurance that efficient and effective controls are in place for managing and reporting sickness and absences. The integrity of the data recorded on this system must be robust so that it can be relied upon to provide accurate reporting and analysis.

A review of the SAMS administrators should be undertaken as soon as possible and only those charged with carrying out the functions should be given the title on the address book on the internal email system.

Management Response

HR&PD agree that additional resources are required.

HR&PD fully support the recommendation of a single HRIS. In 2018 HR&PD undertook a review of HR in the context of re-designing the HR Operating Model and in this regard recommendations were made to the organisation regarding the need to scope, procure and implement a single integrated HR Information System (HRIS) to address the challenges faced by HR&PD and the wider organisation with regard to HR technology. Subsequently a business case to secure funding for the procurement of a HRIS for the organisation was drafted and is currently being considered. The process to secure funding, scope, procure and implement a single integrated HRIS is envisaged to be 3 to 4 years duration.

GIAS Note:

GIAS recognises that it is unlikely that the risks identified in this report in terms of a single integrated HRIS will be mitigated by the time we review this audit. GIAS suggests that the risk is added with a very high rating to HRPD Managements risk registers and escalated up through the Risk Management System.

3.2.4 Divisional/District Administration of Absence

Expected Control

Sick leave files are readily available for inspection at District and Divisional level. Responsibility for maintaining complete sick leave files is assigned to a designated staff member at each location.

Finding

As part of the Meath Audit, GIAS noted when conducting District audits that sick records for Garda staff were maintained in several different locations and not where Garda staff are based. Some files were not readily available for review by the local Superintendent or auditors when required.

Absence recording and maintenance of sick files are not completed by one designated staff member. The SAMS survey states that there are several different administrators in place in Districts and Divisions carrying out different aspects of recording absence and attendance.

SR1 absence forms are completed for all employees in the Districts. The SR1 for Garda Staff is sent to the Divisional EO for input on SAMS and is also input on PeopleSoft. This process is not efficient. The SR1 record is inputted on both SAMS and PeopleSoft on receipt of medical certificates and notification of resumption of duty.

Recommendations:

Priority 2

District and Divisional administrators responsible for maintaining sick records should keep all documentation, including relevant medical certificates and sick leave forms, on file in the District Office to ensure the audit trail.

One SAMS administrator should be assigned for each District who has overall responsibility for recording and maintaining files for absences in their area. A further member of staff should be trained to ensure the process is carried out when the SAMS administrator is not there.

SR1 forms should be phased out on the introduction RDMS.

Management Response:

I agree with the recommendation. HR&PD will issue a HQ Directive to all divisions to reinforce this.

The number of administrators should be at a minimum with a regular review to ensure that access is only as required.

Seirbhísí gairmiúla póilíneachta agus slándála a sholáthar le hiontaoibh, muinín agus tacaíocht na ndaoine ar a bhfreastalaímid

3.2.5 Calculation of days lost to absenteeism

Expected Control

There is a process in place to record and report the number of days lost due to sickness and absenteeism. This report is complete and accurate and is a true representation of actual absence.

Finding

The 5/7 method is used in An Garda Síochána for reporting days lost to sickness to DPER. This allows for a pattern of 104 rest days. GIAS queried with DPER whether there was a policy in place to support this methodology. We were advised that there was no formal policy in place.

There is a risk that this calculation is not a true reflection of the days lost to sickness as the majority of member's work six x ten hour shifts followed by four rest days. The 5/7 calculation is a suitable calculation generally used for employees that work the standard Monday to Friday, however, this work pattern is not representative of the majority of employees working in An Garda Síochána.

GIAS were advised that the 5/7 method is used to align An Garda Siochána with other public sector workers, with the same method used to calculate sickness in the defence forces. GIAS carried out research and found that other Police forces have now moved to a practice of calculating days lost due to sick leave in terms of calendar days, working days, and working hours.

Recommendations:

Priority 1

GIAS recommend that the 5/7 calculation is ceased as it is not an accurate method of reporting sickness for statistical purposes outside the organisation. The methodology used should be based on actual calendar days, working days and working hours lost. Discussion should take place with DPER to ensure an acceptable framework for reporting days lost.

Management Response

The introduction of a single HRIS will provide AGS with an opportunity to strengthen data recording and overall data quality and data analytics capability. Until then the 5/7 calculation is utilised as the means of factoring in rest days and weekends for persons on long term sick leave. The 5/7 calculation is currently used in the DPER statistical return.

GIAS Note:

GIAS recognises that it is unlikely that the risks identified in this report in terms of a single integrated HRIS will be mitigated by the time we review this audit. GIAS suggests that the risk is added with a very high rating to HRPD Managements risk registers and escalated up through the Risk Management System.

Seirbhísí gairmiúla póilíneachta agus slándála a sholáthar le hiontaoibh, muinín agus tacaíocht na ndaoine ar a bhfreastalaímid

3.2.6 Management of Benefit Receipts

Expected Control

Illness and Maternity benefit monies received from the Department of Employee Affairs and Social Protection (DEASP) have an appropriate remittance advice included with each weekly payment outlining details of payments to ensure that correct payments are allocated to the correct individuals.

Finding

There is no formal process in place with the DEASP to exchange data in relation to benefit payments despite this data being shared with the Office of the Revenue Commissioners to change tax credits. The Office of the Revenue Commissioners shares this data with the National Shared Services Centre (NSSC). The NSSC will not share this data with An Garda Síochána.

There is an interim process in place in the Finance Directorate to de-code the data received from the DEASP. This process converts to a readable format the receipt details provided by DEASP following the electronic transfer of payments to the appropriate Garda bank account. This information is then sent to HR weekly with the list of payees.

HR advised GIAS that there are errors in the data received resulting in a high level of queries back and forth. This issue is outside the control of The Finance Directorate who are dependent on the encrypted information being uploaded correctly with each payment received into the bank account.

A reconciliation is not carried out by HR between payment details and the SAMS system to verify whether all funds due are received. There is a serious risk that the Garda Vote is not receiving all benefit payments due as there are no checks and balances carried out. The audit was informed that this reconciliation is not carried out due to the high number of payments and resource constraints. If there is no reconciliation carried out there is a risk that Garda members and staff can mandate illness benefit payments to their own bank account instead of the Garda bank account.

There have been cases identified by HR were the Garda Síochána bank account details have not been filled in on the MED 1 form sent to the DEASP from the local offices. In these cases members personal bank accounts have received the funds despite the monies being due to the Garda Vote. All correspondence to Chief Superintendents in relation to these issues is by hard copy letter in the post which delays the rectification of these issues and results, in the employee becoming overpaid.

Recommendations:

Priority 1

Representatives from both the Finance and HR Directorates must work together to put a process in place to ensure that remittances are received from the DEASP outlining details of all payments. These remittances should be received in an agreed format that can be used to reconcile the payments with both the SAMS and Bank Account.

Formal procedures and controls should be agreed between HRPD and the NSSC to enable accurate exchange of data. Reconciliation procedures need to be developed and implemented as a matter of priority to identify absence and resumption dates between DEASP, NSSC and An Garda Síochána to ascertain what payments are due for an individual claimant.

As this body of work was introduced in 2018, where additional resources are required effort should be made to put them in place.

Priority 3

All queries to Chief Superintendents regarding any benefit payments to members and staff should be scanned and sent by email to speed up response times so that the issue can be rectified promptly.

Management Response:

Following the significant changes in processes both in Revenue and DEASP in January 2018 significant work has been done with HRPD and the Executive Director Finance to establish a methodology of identifying individual payments received in respect of each member of staff who avails of sick leave and in streamlining a process to ensure that NSSO are instructed to adjust employees pay appropriately. This process has been complicated by DEASP making blanket payments to staff who have actually returned to work. Staff from HRPD have met with DEASP and are scheduled to meet with REVENUE to address outstanding issues which continue to complicate the process further.

3.2.7 Training and Development

Expected Control

Evidence that all staff who are assigned as SAMS users are trained appropriately on current policies and procedures and regularly receive refresher training when new circulars, government directives and policies are issued regarding sickness and absence.

Finding

81% of those actively working as SAMS administrators reported that they had received no training in the last 3 years and had to use guesswork on how to create and update a record on SAMS.

96% of SAMS administrators who responded to the survey said that they have received no refresher training to assist them in fulfilling their roles in managing leave at District/Divisional level.

98% of SAMS administrators reported that they would avail of additional training if provided.

Recommendations:

Priority 1

Whilst training for An Garda Síochána is the responsibility of the Garda College, Garda HRPD cannot abdicate their responsibility for the provision of training to ensure that all policies and procedures regarding sickness and absence management are understood and implemented across the organisation.

Regularly organised HR training days should be put in place to give HR users the opportunity to provide feedback on difficulties encountered in Divisions and Districts for recording absence so that appropriate measures can be implemented to rectify problems identified between the HR systems and processes and procedures.

Management Response:

It is agreed that SAMS training days should be organised and is essential to the efficient functioning of the HR PD Sick Absence Management Section and to the correct implementation of policy throughout the organisation. Again, pending the availability of resources this will be actioned as soon as is practicable.

3.3 Work Life Balance / Family Friendly Leave Schemes

Expected Control

Established policies and procedures to manage all leave schemes are available for all employees on the Garda Portal.

Finding

There is no updated FAQ guide available on the Portal outlining the different leave schemes available and where to find the policies and procedures which apply for these schemes.

There is no dedicated HR section mailbox for queries. Emails are sent directly to the section HEO who then assigns the queries to the relevant team member.

There are two different types of file referencing, neither of which follows a logical order, detailed as follows:

- Original File Number allocated to correspondence that the member or staff had first made where there may be more than one application during the duration of service (for example, in the first application for parental leave, carers leave, career breaks – the original file number is the number that is quoted on all letters to the member / staff).
- 2. Payroll Number allocated for payroll purposes (this number differs each time a member or staff makes an application for leave). In some cases, for example, paternity leave or unpaid maternity leave, the payroll number is also used as the file number because there will only be one application relating to that leave (one paternity leave per child / one unpaid maternity leave per child).

Separate teams within the section manage either members or staff schemes. Data is entered and maintained on spreadsheets which are reconciled to GEMS and PeopleSoft respectively.

HR staff copy and paste data responses to queries by email which represents a data breach risk.

There is a disparity between how parental leave is calculated for Garda staff and Garda members who avail of unpaid parental leave. Members are not deducted for a full 10 hour shift when they take one day's parental leave; they are deducted what equates to 8 hours pay. Members who avail of half a day's parental leave are deducted 4 hours pay from a 10-hour shift. New rosters were introduced in 2012 and the calculation of parental leave was never agreed.

In comparison Garda staff who avail of a day's parental leave per week are deducted a full day's pay and half a day's pay respectively.

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It should be noted that the staff in this section do set targets and keep measurements of their performance to date.

Recommendations:

Priority 1

The calculation of member's parental leave in terms of pay must be addressed as soon as possible. There is a loss to the Garda Vote as the member is not available for 10 hours duty but is only losing 8 hours pay.

Management Response

HR&PD can confirm that the instruction issued to NSSO in respect of Garda members sets out a deduction based on full day or half day absences only as there are no arrangements for avail of parental leave on an hourly basis. The Executive Director of Finance may wish to add to this in respect of the payroll arrangements in place for hourly rates of pay for Garda members.

From Finance Directorate

Finance Directorate has no access to or involvement with Members' personnel records.

HR&PD is aware that there are a number of anomalous variables in respect of the recording, monitoring, calculation and administration of paid and unpaid leave, both in respect of partial (e.g. leave in hours) and full (e.g. leave in days) leave arrangements. In this regard a wider view must be considered that incorporates the administration of the Garda payroll and how calculations in respect of Garda Members pay are dealt with overall. HR&PD consider it appropriate that examination and resolution of such anomalous variables should be incorporated into the Terms of Reference of the Rosters Working Group and the Allowances Review Group under the CFPI arrangements.

Priority 2

It is recommended that FAQ for family friendly schemes is made available on the Portal for the organisation, together with samples and scenarios for all schemes. This FAQ should also link to forms and relevant circulars on how to apply for this leave.

Due to the large volume of enquires directed to the section it is recommended that a dedicated mailbox is set up. When set up it will ensure these queries are answered as several people can access it. It is also useful to track the number and types of queries received for forward planning.

GEMS has the functionality to provide automated letters for staff queries, these forms should be used instead of copying and pasting data.

Seirbhísí gairmiúla póilíneachta agus slándála a sholáthar le hiontaoibh, muinín agus tacaíocht na ndaoine ar a bhfreastalaímid

GIAS recommend one file referencing system is put in place. The primary key for this system should be member registration number or Garda staff number for file referencing.

Maintaining and updating leave schemes on spreadsheets should be eliminated as soon as possible and records updated and queried from the GEMS system.

Management Response:

The requirement for an FAQ document will be addressed for Garda Staff in the updated/revised Garda Staff Handbook. Dedicated mailboxes have been put in place Remaining recommendation will be considered and progressed subject to resources becoming available to the team.

3.4 Overpayments

3.4.1 Overpayments Process

Expected Control

Those individuals with repeated overpayments are removed from the payroll in a timely manner when pay has been exhausted due to exceeded sick leave entitlements. A robust system exists to identify when allowances and pay are affected after 28 days absence.

Finding

There is no formal procedure in place to capture repeated overpayments.

Quarterly reports don't identify whether an individual has more than one overpayment making it difficult for the overpayment unit to actively monitor individuals who have repeated overpayments.

The unit is not assigned full time to managing overpayments, staff duties are split across various functions.

The Unit is dependent on SAMS administrators to input sick leave on SAMS in order to generate absence reports after 28 days as per absence management policy guidelines and to contact Killarney to identify what allowances are pay affected.

91% of SAMS administrators from the GIAS survey say there are no system prompts to alert them when sick leave with pay has been exhausted which is leading to overpayments and unauthorised allowances.

Recommendations:

Priority 1

It was recommended as part of the 2017 GIAS review of overpayments of pay & pensions that staff in the unit should be assigned on a full time basis to the management and review of overpayments and to recommend cases for Positive Input.

A Human resource management system needs to be put in place as soon as possible to manage losses to the Garda Vote in relation to overpayments of pay & pensions.

3.4.2 Positive Input

Expected Control

There is a structured policy and process to place those who are consistently absent on Positive Input to reduce the risk of overpayments.

Finding

Positive Input is a system where the individual is paid for actual hours worked which mitigates the risk of future overpayments.

Only 2 cases have been reported to GIAS were the individual has been placed on Positive Input.

The overpayment unit don't have the necessary resources to review cases that would benefit from Positive Input.

Recommendations:

Priority 1

It was recommended as part of the 2017 GIAS review report on Overpayments that a resource is assigned to both the overpayment unit and SAMS unit to review and recommend cases for Positive Input. The roll out of the RDMS system should aid this process and HR should liaise with the RDMS team to develop required reports and processes.

Management Response:

The respective section of HR&PD tasked with the administration and oversight of absence management and overpayments work collaboratively to address issues of concern regarding an individual's propensity to avail of unpaid absences and accrue overpayments where appropriate to best serve the interests of the organisation and the needs of the individual. This collaborative working practice will continue.

3.5 The Garda Occupational Health Services

3.5.1 Referrals to Chief Medical Officer (CMO)

Expected Controls

is the basis document for the interaction between sickness absence management section and the Garda Occupational Health Services (GOHS).

Referrals from ordinary illness are made after 28 days sickness absence as per the directive and those referred should be seen in a timely manner.

Referrals to GOHS are taking place if an employee has a pattern of short term absences (Circular 05/2018).

The correct process is followed when referring an employee to the GOHS (circular 05/2018).

The GOHS provides regular prompt appointments for those absent on long term sickness including from Injury on Duty.

Finding

There is lack of clarity as to who is responsible for completion of the SAMS system regarding GOHS referrals / appointments.

A new procedure is in place since February 2018 where the line manager and HR hold at least one sick leave review meeting with the employee to address consistent short term absenteeism.

SAMS Users as part of the anonymous survey were asked about their experience with referrals to the GOHS. A large number of respondents said that it took too long to get someone referred and even longer to get a response from the GOHS.

There are considerable backlogs for referrals in the past 12 months due to staff challenges in respect of shortage of occupational health physicians, the increasing numbers in the organisation and numbers seeking entry into the organisation.

The current physician staff compliment of GOHS comprises of (2)	full time physicians
including the CMO and (1) Sessional physician	
only 3 occupational nurses that work alongside these physicians.	There are currently

Recommendation

Priority 2

As per circular 05/2018 it is under the remit of GOHS, not HR, to decide that an appointment is required when an employee is referred. Correct protocols for referrals should be followed.

Based on the responses from the CMO and the current backlog of referrals noted, the numbers of physicians and nurses employed are not sufficient to run an effective occupational health service for An Garda Síochána given the large numbers employed in the organisation and to reduce the number of sickness absences.

It is recommended that a full review is carried out by the CMO to identify efficiencies in order to reduce the current backlog of referrals. Regionalising aspects of GOHS services should be seriously explored to reduce the cost of travel and sub associated with GOHS appointments.

The backlog of referrals requires immediate attention to reduce waiting times and to mitigate the cost of sickness absences to the organisation.

Management Response:

The Office of the CMO is not responsible for updating SAMS and has no SAMS administrator rights. All information relating to absenteeism is recorded by HRPD and SAMS administrators on SAMS.

The CMO acknowledges that there were considerable backlogs due to staff shortages and legacy cases. However, since September 2018 a third full-time occupational physician has been employed in the service and a new configuration of how the workload is shared among the physicians has been implemented. The backlog and associated risks are in the process of being mitigated.

The CMO, as part of the workforce planning project, would welcome a fourth and final full-time physician and a further 4 occupational health nurses as this is in line with published recommendations on occupational health staffing ratios and would improve the efficiency of GOHS considerably. This will be followed up with HRPD.

GOHS is currently working on refining and updating its practices and processes and improving efficiencies, and the CMO supports the recommendation of regionalising aspects of GOHS services across Ireland.

3.5.2 Recuperative (Light) Duties and Restricted Duties

Expected Control

That a report is sent to the Assistant Commissioner of the employee and HRPD as per chapter 11.40 of the Garda Code when a member is on recuperative (light) duty for 30 days within a 60 day period.

Finding

72% of respondents to the SAMS survey do not send these reports.

This function within the role of a SAMS administrator is not clear. The reports are not submitted.

Sickness section in HRPD reported that it was a very tedious task when it comes to getting quarterly returns from some Divisions and it is difficult to obtain the returns in a timely manner.

The table below outlines the current number of sworn members reported as being on light/restricted duties to December 2017.

Data for 2018 were not available to GIAS.

2015	383	No rank breakdown av	ailable
2016	Head Count	2017	Head Count
Garda	379	Garda	429
Sergeant	43	Sergeant	36
Inspector	2	Inspector	1
Total	424	Total	466

Returns for light duties are compiled manually from data received from the Divisional offices.

There is currently no automated system in place to capture this data.

Recommendations

Priority 2

While it is acknowledged that ill health is unavoidable and outside the control of the Divisional Officer, absence management and return to work is a combined effort between line management, HRPD and the GOHS (Garda Occupational Health Service). The GOHS has a key role to play in structured return to work where recuperative (light) duties are required.

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This should include setting targets and providing regular reviews to HRPD based on the clinical progression of such cases. One of the significant risks for An Garda Síochána is if there are no set plans in place there is the perception that members who do not want to go back to front line policing duties or have a poor work ethic are seen to have a cushy number on light duties for lengthy periods of time. This in turn has a knock on effect on other members / staff morale.

When a member is assigned to recuperative (light) duties it should not automatically be taken to mean that they are assigned to clerical work. GIAS recommends that Task Analysis define core policing and varying grades of operational capabilities. This will ensure that each member is utilised to their full capacity.

GIAS recommend the performance of members on light duties should be subject to continuous review and report by direct supervisors. Where it is considered a member cannot return to full duties or would not be in a position to make adequate contribution to the work of policing in the long term it must be reported to senior management with the view to transferring to an administrative grade, early retirement, or retirement on ill health grounds.

Management Response:

In respect of HRPD, work is underway which would see the introduction of a new policy to assist and support employees returning to work following absence including provisions for reduced hours and duties. The co-operation of GOHS will be a key component of this policy in providing timely periodic reviews of employee's fitness.

In respect of CMO, there is a proposal to introduce a module as part of the Sergeant and Inspector courses on how to more effectively engage and support members experiencing health challenges. This should include, but not be limited to, their responsibilities as line managers in respect to absence management.

The CMO believes that the recently released 2019 Census will shed more light on the number of members on recuperative (light) duties and those on long term restrictions. Following the release of these statistics the CMO aims to review all such cases and ensure continuity and consistency.

The CMO fully supports the introduction of various grades of operational capacity to help efficiently allocate members not in a position to undertake full operational policing duties as a result of illness or injury in the short or longer term.

3.5.3 Health and Wellbeing for employees

Expected Control

The organisation actively promotes health and wellbeing for all employees through the provision of seminars and information on the Portal.

The directorate under the CMO which includes, GOHS alongside the Garda Employee Assistance Service is developing a health and wellbeing strategy for all employees. This will help to reduce tours of duty lost to sickness and injury through better health.

Finding

GIAS queried what health and wellbeing services are currently being provided by the GOHS. We were advised that there are seminars delivered through the Garda College as part of trainee's induction and that presentations are made at pre-retirement courses.

There are occupational health information pages on the Garda Portal, and health promotional talks provided as part of the consultation with GOHS clinical staff. GOHS also deliver a preventative health programme for circa 600-800 Garda recruits each year. This is provided by an outsourced arrangement with the GP who provides primary care services to the trainees at the Garda College.

GOHS provides a periodic health surveillance programme to members involved in safety critical roles or duties in compliance with specified health and safety regulations or legislation.

GIAS found it difficult to clearly identify widely available material on health and wellbeing services offered within the organisation that is geared towards both Garda members and Garda staff. The GOHS portal page has a very limited amount of information on health and wellbeing services.

Recommendations

Priority 2

Workplace wellbeing programmes aid the employee, their family and the organisation. GIAS recommend that a working group is set up to review operational stress, occupational stress and lifestyle, health and wellbeing of all staff with a view to introducing more regular seminars that are targeted at health and wellbeing initiatives.

Management Response:

The CMO aims to deliver a health and wellbeing strategy in partnership with other areas of the organisation such as the Garda College, Health and Safety and the Employee Assistance Service.

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The CMO will be the business sponsor for this strategy. Prior to the completion of the strategy and launch of same, and as part of the next policing plan, each district will be required to identify one health and wellness initiative already in place or to be introduced in their respective districts.

The CMO is currently working with the AGS Portal team to create a Health and Wellbeing information hub on the portal.

4 Acknowledgement

Garda Internal Audit Section would like to express our gratitude to the Executive Director of HRPD and his staff, Representatives from ICT and the Chief Medical Officer for their assistance during the course of this audit.

Niall Kelly

Head of Internal Audit Date: 21/05/2019

APPENDIX 1 - Categorisation of Audit Findings

The findings in this report have been categorised using a formalised risk assessment process as follows;

Priority 1: Where both the impact of the control weaknesses on the operations of the Division and the likelihood of occurrence is considered to be high. Priority 1 issues need to be given immediate attention by management as this represents **high risk**.

Priority 2: Where one of either the impact of the control weakness on the operations of the Division or the likelihood of occurrence is considered to be high and the other is considered medium. Priority 2 issues need to be given attention by management as this represents medium to high risk.

Priority 3: Where one of either the impact of the control weakness on the operations of the Division or the likelihood of occurrence is considered to be medium and the other is considered low. Priority 3 issues need to be given attention by management as this represents medium to low risk.

Priority 4: Where both the impact of the control weak on the operations of the Division and the likelihood of occurrence is considered to be low. Management should keep Priority 3 issues under review as this represents **low**.