


Executive summary

Report classification	Total number of findings				
	Prioritisation of agreed action				
 Limited subject to the scope and limitations of scope set out in Section 2 of this report	Control	1	2	3	
	Control design	-	1	3	-
	Operating effectiveness	-	-	-	-
	Total	-	1	3	-

Headlines / summary of findings:

There are six key aspects to managing social media effectively – Social Strategy, Social Governance, Social Policy, Social Resilience & Crisis Management, Data Privacy & Control and Regulatory Compliance.

Whilst this review focused on Social Governance aspects of PSNI social media management, the review identified several broader weaknesses which collectively impacts upon PSNI's ability to harness value from social media platforms.

There is no strategy which defines how PSNI wishes to use social media and linkages through to PSNI objectives but rather the focus is on tactical application of specific social media products.

The lack of dedicated permanent resource within Corporate Communications Department creates challenges and risk as there is an over reliance on two officers within the Department, both of whom are on restricted duties and likely to transfer back into front line policing roles at some point in the short to medium term. This comes at a time when both officers are delivering social media training and also working to ensure appropriate coverage at District level given the structural changes currently being implanted at Districts.

There is a lack of policy / procedural guidance for governing social media at present. This is important given the potential reputation risks associated with this form of media engagement and given PSNI's plans to increase the number of officers who will use social media, it is important that the policy and procedural framework is robust.

The construct of the PSNI website makes navigation to and from the various social media platforms difficult at present but there is an opportunity to refresh the overall PSNI social media framework as part of the broader realignment of Districts.

2. Background and scope

Background

PSNI operates two main types of social media platforms namely Facebook and Twitter with over 64 separate accounts (32 Facebook pages and 32 twitter accounts). This review focused on the high level governance arrangements relating to use of social media by PSNI as a communication and engagement channel.

There are 250 social media users within PSNI and the Corporate Communications team is currently rolling out social media training; of which at the date of our fieldwork, 140 users had received with plans to train a further 130 individuals. PSNI has also recently acquired a 3rd Party social media Management Product (Hootsuite) which provides specific functionality in relation to social media postings and reporting.

At the date of our fieldwork, PSNI has 314k followers across twitter and Facebook of which 150k had been added in the previous 12 months.

Scope and limitations of scope

The scope for this assignment was as follows:

Sub-process	Objectives	Preliminary risk assessment
Ownership	Clear ownership for social media within PSNI	<p>✓ Unclear responsibility for social media usage within PSNI</p> <p>Lack of clarity on social media links within overall communications strategy and broader PSNI objectives</p>
Defined Governance arrangements	Defined governance structures and definition of acceptable use of social media with appropriate monitoring.	<p>Lack of approved policy for Social Media including acceptable use and or policy does not align with other corporate PSNI policies including code of ethics</p> <p>Policy does not deal with internal and external social media usage</p> <p>Policy does not address following matters:</p> <ul style="list-style-type: none"> ✓ • Processes for setting up and or deleting social media channels ✓ • Access to social media channels (at a strategic level only) ✓ • Processes for adding social media content ✓ • Use of monitoring tools on a consistent and regular basis ✓ • Social media abuse and incident reporting including clarity of escalation arrangements ✓ • Removal of content , if necessary (and related monitoring)

		✓ Lack of reporting on outcomes / value derived from social media (specific defined metrics)
Training	Provision of training to users	✓ Training needs not identified ✓ Training delivered does not align with needs of different user types (e.g. ACC various line manager) ✓ Lack of refresher training ✓ Training records incomplete
<i>Limitations in Scope</i>		
<p>This review focused on an assessment of the high level governance arrangements only. It did not cover the following</p> <ul style="list-style-type: none">• Data privacy and control - (including penetration testing, data protection and data retention matters)• Social resilience and crisis management• Regulatory compliance including legal implications• All other matters other than those noted within the scope section above.		

3. Detailed current year findings

1. Accountability and Resilience – control design

<i>Finding</i>		
<i>Social Governance</i>		
<p>The Head of Corporate Communications is ultimately accountable for social media with her functional area maintaining responsibility for oversight whilst local Districts and Neighbourhood renewal teams manage the content flow at a local level. However there are no formal role descriptions which define responsibilities for individuals with specific social media related responsibilities either within Corporate Communications or District. Given the changes within Districts including the introduction of “blended” service delivery teams, there has not been any formal plans developed to ensure clear accountability for social media updates and local monitoring at District level during the transition.</p> <p>Within Corporate Communications, the monitoring of the social media feeds is undertaken by two temporary post holders both of who are on restricted duties. Given the operational pressures facing PSNI, it is highly probable that both officers will be asked to return to front line duties. Internal Audit had sight of a document which referenced that it was likely that both individuals would return to core policing duties by the Autumn of 2015. The current resourcing arrangements are not sustainable, create resilience pressures and present a number of risks which at a minimum could cause significant reputational damage for the organisation. The Head of Corporate Communications acknowledges the risks but also acknowledges the broader financial pressures facing PSNI.</p> <p>The two officers within Corporate Communication who provide the majority of support if any issues arise work between Monday to Friday, 9am and 5pm. Therefore if issues arise during “out of hours” there is no resilience / support available to respond. We understand that there were some initial discussions that the call handling function would provide some monitoring support during the hours of 2am to 9am but this proposal has not been implemented to date. Specific ACPO / national policing policy states “Social media is a two way communication channel and people will reply to tweets and will send messages on Facebook. Wherever possible, respond to content posted by others, whether positive or negative. Social media is 24/7 and forces should have procedures in place for monitoring and responding daily you are legally responsible for what is published on social media sites that you moderate. If a member of the public posts a racist comment on your Facebook page it must be removed or you, as the page administrator, are legally responsible.”</p>		
<i>Implication</i>		
<p>The current lack of permanent resource at Centre, lack of defined roles and responsibilities across the organisation in relation to social media could result in lack of clear understanding and accountability for specific risks associated with social media, specific vulnerabilities which may result in reputational damage / missed opportunities for engagement. The inconsistency of current service provision heightens the inherent risk that PSNI does not meet national policy requirements relating to social media.</p>		
<i>Action plan</i>		
<i>Priority</i>	<i>Agreed action</i>	<i>Responsible person / title</i>
1	A bid will be made to the next Resourcing Forum for specialist resource to undertake the role of developing governance, compliance and audit policy and processes.	Liz Young, Head of Corporate Communications
		<i>Target date:</i>
		September 2015

2. **Social Media Strategy - control design**

<i>Finding</i>		
<i>Social Media Strategy</i>		
<p>There is no defined strategy for social media within PSNI in terms of objectives, linkages through to the PSNI policing plan together with targets/ KPI's to measure what success is in the context of social media usage for the organisation. The strategic outline case for 'Project Quebus' (October 2013) contained some narrative regarding the potential use for social media engagement within PSNI focused upon widening access and community engagement but was limited in content and did not constitute a strategy aligned with PSNI objectives.</p>		
<i>Implication</i>		
<p>Without a clear strategy, it is hard for PSNI to implement controls which will enable the organisation to meet social media related goals whilst at the same time managing related risk.</p>		
<i>Action plan</i>		
<i>Priority</i>	<i>Agreed action</i>	<i>Responsible person / title</i>
2	<p>Dependent on adequate budget being available, progress recruitment for skilled persons to lead the development of social media strategy, implement effective governance policy and process arrangements.</p>	<p>Liz Young, Head of Corporate Communications</p> <p><i>Target date:</i> September 2015</p>

3. **Social Media policy – control design**

<i>Finding</i>		
<p>There is currently no formal policy / procedural documentation in relation to the following inter alia:</p> <ul style="list-style-type: none"> • Process for setting up / deleting social media channels; • Access to social media channels (at a strategic level); • Process for adding social media content; • Use of monitoring tools on a consistent and regular basis; • Social media abuse and incident reporting including clarity of escalation arrangements; and • Removal of content, if necessary (and related monitoring). 		
<i>Implication</i>		
<p>The lack of procedural guidance together with the resilience issues identified previously “Accountability and Resilience” creates an over reliance on individuals to understand and apply what they believe are appropriate standards to social media rather than what PSNI defines as acceptable. This could result in lack of control/ inappropriate usage, failure to respond in a way which is consistent with PSNI’s strategic requirements and also potential risk of litigation.</p>		
<i>Action plan</i>		
<i>Priority</i>	<i>Agreed action</i>	<i>Responsible person / title</i>
2	<p>Dependent on adequate budget being available, progress recruitment for skilled persons to lead the development of social media strategy, implement effective governance policy and process arrangements.</p>	<p>Liz Young, Head of Corporate Communications</p> <p><i>Target date:</i></p> <p>September 2015</p>

4. Facebook Accounts – control design

<i>Finding</i>		
The existing Facebook accounts used by PSNI do not align with existing Districts e.g. PSNI Fermanagh and PSNI Foyle and it is also difficult to navigate to various Facebook accounts from the PSNI website.		
<i>Implication</i>		
<p>Feedback from the Corporate Communications team indicates that Facebook is being used successfully within specific Districts to engage with certain community groups that historically PSNI has found challenging to engage with.</p> <p>The current naming conventions and the navigation process required to find specific PSNI Facebook accounts may mean that it is difficult for users to identify a local PSNI Facebook account that they wish to follow. This means that PSNI is not maximising the potential social media as a communication / engagement tool offers.</p>		
<i>Action plan</i>		
<i>Priority</i>	<i>Agreed action</i>	<i>Responsible person / title</i>
2	Dependent on adequate budget being available, progress recruitment for skilled persons to lead the development of social media strategy, implement effective governance policy and process arrangements.	Liz Young, Head of Corporate Communications
		<i>Target date:</i> September 2015

Appendix 1. Basis of our classifications

Individual finding ratings

The priority ratings for individual findings / action plans are as prescribed by the Department of Finance and Personnel, reference HIA (DFP) 01/12 and are as follows:

Priority	Assessment rationale
1**	An issue which requires urgent management decision and action without which there is a substantial risk to the achievement of key business/system objectives, to the reputation of the organisation, or to the regularity and propriety of public funds.
2	An issue which requires prompt attention, as failure to do so could lead to a more serious risk exposure.
3	Improvements that will enhance the existing control framework and / or represent best practice.


** Any priority 1 issue that is considered to be critical (and not just significant) in nature, will be separately identified.



Report classifications

The report classification is determined by allocating points to each of the findings / action plans included in the report as follows:

Priority	Points
1 (Critical)	40 points per finding
1	10 points per finding
2	3 points per finding
3	1 point per finding

We adopt a classification system for the assurance achieved in each audit. This classification system is as per DAO (DFP) 07/13.

Report classification	Points (Indicative ^{**})
 Substantial There is a robust system of governance, risk management and control which should ensure that objectives are fully achieved.	6 points or less
Satisfactory Overall there is an adequate and effective system of governance, risk management and control. While there is some residual risk identified this should not significantly impact on the achievement of objectives. Some improvements are required to enhance the adequacy and/or effectiveness of governance, risk management and control.	7– 15 points

<i>Report classification</i>		<i>Points (Indicative²²)</i>
 Limited	<p>There is an inadequate and/or ineffective system of governance, risk management and control in place. Therefore there is significant risk that the system will fail to meet its objectives.</p> <p>Prompt action is required to improve the adequacy and/or effectiveness of governance, risk management and control.</p>	16– 39 points
 Unacceptable	<p>The system of governance, risk management and control has failed or there is a real and substantial risk that the system will fail to meet its objectives.</p> <p>Urgent action is required to improve the adequacy and/or effectiveness of governance, risk management and control.</p>	40 points and over

The report classification assigned to any audit remains a matter of professional judgement for the Chief Audit Executive. The number of points leading to each report classification is therefore indicative only. There may be exceptional circumstances where, in the opinion of the Chief Audit Executive, the adequacy and / or effectiveness of the underlying system / process subjected to audit, is not consistent with the report classification derived using the scoring mechanism outlined above. In this instance, the formulaically derived classification can be overridden. Where this override has been utilised, this will be fully explained.

An override has not been used in arriving at the report classification for this audit.

Appendix 2. Limitations and responsibilities

Limitations inherent to the internal auditor's work

We have undertaken the review of Social Media, subject to the limitations outlined below.

Internal control

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Future periods

Our assessment of controls relating to Social Media for the February to March 2015. Historic evaluation of effectiveness is not relevant to future periods due to the risk that:

- the design of controls may become inadequate because of changes in operating environment, law, regulation or other; or
- the degree of compliance with policies and procedures may deteriorate
- the change in governance arrangements subsequent to the date of testing covered as part of this review.

Responsibilities of management and internal auditors

It is management's responsibility to develop and maintain sound systems of risk management, internal control and governance and for the prevention and detection of irregularities and fraud. Internal audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.

We endeavour to plan our work so that we have a reasonable expectation of detecting significant control weaknesses and, if detected, we shall carry out additional work directed towards identification of consequent fraud or other irregularities. However, internal audit procedures alone, even when carried out with due professional care, do not guarantee that fraud will be detected.

Accordingly, our examinations as internal auditors should not be relied upon solely to disclose fraud, defalcations or other irregularities which may exist.