



HMCPSI

HM Crown Prosecution
Service Inspectorate

SFO response to COVID-19: 16 March to 8 May 2020

**An inspection of the SFO during
the period prior to and during
the national lockdown**

July 2020

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Who we are

HM Crown Prosecution Service Inspectorate inspects prosecution services, providing evidence to make the prosecution process better and more accountable.

We have a statutory duty to inspect the work of the Crown Prosecution Service and Serious Fraud Office. By special arrangement, we also share our expertise with other prosecution services in the UK and overseas.

We are independent of the organisations we inspect, and our methods of gathering evidence and reporting are open and transparent. We do not judge or enforce; we inform prosecution services' strategies and activities by presenting evidence of good practice and issues to address. Independent inspections like these help to maintain trust in the prosecution process.

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1. Summary

Context

1.1. This report examines the immediate response of the Serious Fraud Office (SFO) to the severe acute respiratory syndrome coronavirus 2 (the virus which causes COVID-19). The inspection has been limited to the period immediately prior to the lockdown announced by the Prime Minister on 23 March and for the following eight weeks. The inspection covers the period from 16 March to 8 May 2020.

1.2. After it emerged in China in December 2019, coronavirus spread rapidly to other parts of the world. This included the United Kingdom, where the first cases were confirmed in January 2020.

1.3. On 30 January 2020, the World Health Organisation declared an international public health emergency. In common with most other countries, the United Kingdom entered a period of great uncertainty. Up to mid-March, there were some indications from the government and public health experts that a period of restriction and lockdown may become necessary to curtail the spread and impact of the virus. The week before the Prime Minister's official announcement on 23 March, restrictions on movement were starting. The SFO, in anticipation of a total lockdown, began to warn staff to keep laptops with them when in the office or at home.

1.4. Virtually all SFO staff work from its office near Trafalgar Square in London. The lockdown and consequent office closure had a big impact on the SFO.

Summary

1.5. The immediate crisis caused by the spread of coronavirus has been a significant challenge for the SFO but, on the whole, it is a challenge it has dealt with effectively. Prior to the lockdown, the SFO was not an organisation where large numbers of staff worked from home, and its IT architecture was not designed for that purpose. Despite that, over a very short period, the SFO successfully moved to a position where the vast majority of staff were working from home and the business has continued to operate.

1.6. Over the past several years, the SFO's IT development activity has focused on providing a stable and secure case management system and upgrading its document review system. The SFO's operating framework has been built around the majority of staff accessing systems from the

office. As such, there has been limited opportunity or need for staff to work from home. At the advent of lockdown, the overnight shift to the majority of staff working from home and requiring access to such systems raised a number of new IT issues for the SFO.

1.7. In the weeks immediately preceding lockdown, the SFO recognised the potential for large numbers of staff to require access to its network from home. As a result, it instigated a large scale purchase of remote access tokens. This dramatic upscaling of remote access did put a significant strain on the network capacity and caused a number of issues. However, by staggering logins by staff and limiting access to high demand evidence during peak times, the SFO has managed to maintain network access throughout lockdown without major disruption, though this has been slow at times.

1.8. Two weeks prior to the announcement of the lockdown, whilst responding to staff displaying COVID-19 symptoms, the SFO was required to invoke its business continuity plan and a full office closure. This fact was in some way helpful to future planning. The SFO executive group (the senior leadership team) were able to use this opportunity to prepare for an anticipated lockdown situation.

1.9. At the advent of the office closure in mid-March, the SFO set up a contingency planning group of senior managers chaired by the Chief Operating Officer. The group operated along similar lines to those anticipated in the business continuity plan process and met daily to make decisions where required. From the start, this group provided regular and clear messaging to be cascaded to staff. Importantly, it also provided an email address by which staff could directly access the group to voice their thoughts and questions. This has been used to quickly give answers and clarify issues. This approach served the SFO well throughout the subsequent full lockdown.

Senior managers have recognised the importance of keeping staff informed and up to date

1.10. Senior managers have recognised the importance of keeping staff informed and up to date. This is reflected by the positive comments from managers and staff we spoke to about communication throughout this period. Staff were happy with the amount and quality of communication that they had from

managers, and most felt they had been kept up to date with decisions made and that routine contact with managers had worked well. The

intranet, staff emails, division and team meetings have all played an important part.

1.11. This has to be seen in context of the lack of video conferencing facilities available to the SFO during this period. Whilst video conferencing has quickly become the norm across many companies and civil service organisations, this is not the case in the SFO. During lockdown, this has proved a source of frustration for staff, where reliance has been on telephone conferencing.

It is clear that the SFO has been committed to the health and well-being of its staff during lockdown

1.12. It is clear that the SFO has been committed to the health and well-being of its staff during lockdown. As well as following central government and Public Health England guidance and directives, the SFO has provided a range of health and well-being advice and guidance to staff. This has been through formal updates and also in

staff and manager blogs. Staff have also used the intranet to support colleagues. Updates from the SFO's Mental Health and Well-being Group and the Culture Change Team have also been widely welcomed by staff we spoke to. The SFO also recognised that face to face contact is helpful to mental health and well-being, and therefore has widely supported the use of external video platforms on personal devices for anything other than official business.

1.13. The SFO has had a small number of staff working at its office throughout the lockdown period, many of whom have been doing the vital role of ingesting and processing digital material and evidence. Some staff we spoke to felt that there was an expectation that they would work from the office, and there were mixed opinions as to how effectively their health and well-being had been supported. Social distancing did prove difficult to manage for some who were working in the office. The SFO did, however, provide meals to limit the need for them to leave the building, put in place measures to assist them with travelling to and from the office, and introduce a shift rota, thereby reducing the amount of staff present at any one time.

1.14. The SFO has provided good support for members of staff with reasonable adjustments, ensuring that equipment needs were quickly put into place, but staff expressed some resentment about the decision not to provide peripheral IT equipment or any other office equipment to all staff. This has had a potential impact on their health and well-being.

1.15. The SFO has shown that it is prepared to support staff who are unable to work through the flexible application of special leave. It has increased the amount of special leave allowed and afforded its managers discretion to apply special leave policy where necessary in excess of this.

2. Framework and methodology

Inspection framework

2.1. The framework for this inspection consisted of an overarching inspection question and four sub-sections of questions. The inspection question was: “How effective was the Serious Fraud Office’s immediate response to the COVID-19 pandemic? (An inspection of action and activity by the SFO between 16 March and 8 May 2020)”.

2.2. The four sub-sections of questions can be found in annex A. These were:

- digital capability
- communication
- health and well-being
- business continuity planning.

2.3. A decision was made to limit the inspection to focus on the SFO’s response and not to test how any engagement by the SFO landed with, or was affected by, other criminal justice partners and stakeholders.

2.4. This inspection is a first stage or immediate report. It sets out our findings about how the SFO managed and reacted to the pandemic in the immediate aftermath of the crisis. We plan to undertake a more extensive inspection, likely in 2021, which will examine the recovery phase in greater detail and also look more closely at the stakeholder relationships and their impacts, both at the initial stages and as recovery plans are developed. This further inspection will test how other stakeholders, both national and international, felt that the SFO’s response affected and worked for them. This will require more detailed inspection activity to engage stakeholders.

Methodology

2.5. The inspection has been conducted at speed to allow for the publication of the report as close to the period of lockdown as possible. This will ensure that issues covered in the report are fresh in readers’ minds. We have followed our usual inspection methods but truncated the timescales of some aspects. The core aspects of evidence gathering and judgement testing have taken place as always.

2.6. In line with our inspection methodology, we requested and examined documents before starting our on-site activity. (It should be noted that, because of COVID-19, we too have had to adapt our methodology. 'On-site' now means a virtual visit, with all interviews taking place over telephone conference calls.) Some of the information gathered was already held by the SFO to support reports prepared for the Attorney General and Ministerial Strategy Board in March 2020 and May 2020, and these were shared with us. During the course of the inspection, we requested additional documents and analysed them to support our interviews and focus group discussions.

2.7. To speed up the inspection, we also held a number of initial fact-finding conversations with the Chief Operating Officer, the Head of Communications and the Head of Corporate Services in the week of 29 June 2020. In these conversations, we discussed some of the actions taken by the SFO to support communication, staff health and well-being.

2.8. During the weeks of 29 June and 6 July, the inspection team interviewed key senior officials and held focus groups and one to one interviews with SFO staff using telephone conference calls. We also spoke with representatives from the First Division Association, Prospect Union and the Public and Commercial Services Union, who represent staff who work for the SFO.

3. Business continuity planning

3.1. All organisations should have effective systems and processes in place to ensure that they can continue to deliver core aspects of business despite significant and major disruption. This is sensible and for most it is essential. To do this, organisations usually develop a range of measures, which often include risk registers and business continuity plans. Such plans help organisations determine what they would do if such a catastrophic event happened.

3.2. In line with good governance, the SFO has in place a business continuity plan and command structure¹. The SFO's plan and structures were recently subject to an independent audit review. In line with a cross-government agreement, the SFO is audited by the HM Revenue and Customs audit service. The business continuity audit was part of the agreed 2019–20 Internal Audit plan. It was included to assess the adequacy, and provide assurance, of the SFO's controls on risk management, control effectiveness and governance in respect of business continuity. The audit report, published on 10 June 2020, concluded that effective controls were in place to support identifying risks, and planning and responding to business continuity incidents. Our inspectors' views accorded with the audit findings: that the SFO's business continuity arrangements seemed effective.

3.3. One key aspect of ensuring the effectiveness of business continuity plans is regular and routine training and testing. The last time the SFO business continuity plan was formally tested was 12 July 2017. Recognising that the testing of its plan was overdue, the SFO had planned to carry out a formal test in April 2020. In preparation for this planned test, the SFO had carried out a series of training sessions and updated its business continuity plan in January and February 2020. Although this training was in preparation for the planned test, it proved fortuitous in light of the COVID-19 situation, which directly affected the SFO in March 2020.

3.4. Following a small number of suspected COVID-19 cases reported amongst staff at the SFO offices on 12 March 2020, the SFO initiated its business continuity plan and instructed an immediate office closure. This resulted in the office being vacated and deep cleaned during the weekend following the closure. This decision to close and the subsequent dissemination of information followed the business continuity plan

¹ A gold–silver–bronze command structure is a command hierarchy used for major operations and designed for responding to sudden major incidents. These categories designate different responsibilities of decision making, usually between strategic, tactical and operational command levels.

processes and were enacted using the command structure, as scheduled in the plan. It is clear that the business continuity plan update and training carried out in January and February 2020 significantly helped the SFO to respond to this situation as effectively as it did.

3.5. Following the weekend deep clean, the SFO reopened the office on 16 March and officially revoked the business continuity planning situation. National events, including lockdown, then impacted on the SFO like all organisations the following week.

3.6. Staff and managers felt that the initial evacuation of the office was handled well. In addition, communications over the weekend of closure and deep cleaning were effective and staff were kept informed of

developments in preparation for a return on 16 March.

Staff and managers felt that the initial evacuation of the office was handled well

3.7. During the week of 16 March, a week ahead of lockdown, the Executive Group had daily conversations to prepare for a potential lockdown situation. Throughout the week, managers started to advise staff

to work from home if they could, and indicated that laptops should be taken home in case lockdown was announced with limited notice.

3.8. Following the national lockdown announcement on 23 March, the SFO did not formally invoke the business continuity plan again – but from that point onward, it has followed the main organisational decision making and communication principles within the plan. A contingency planning group of senior managers was created, chaired by the Chief Operating Officer. This group met daily for the two weeks following lockdown and set out key actions to deal with the impact of COVID-19. After this, the group met three times a week.

3.9. The contingency planning group mainly focused on how to manage the effects of the office closure on the SFO's staff and operations, and on facilitating quick decisions to minimise any negative impact. The group faced a number of major issues during this period, including:

- maintaining an effective and stable IT platform which allowed suitable access for staff
- supporting staff while they were working at home
- supporting staff who had to continue attending the office.

3.10. The view of senior managers that we spoke to was that this process provided a good level of clarity. The group also provided staff in general with regular updates of key decisions. We discuss this aspect in chapter 5.

3.11. In the recent COVID-19 Cabinet Office survey², 85% of respondents indicated they were happy with the way senior leaders handled the impact of the COVID-19 outbreak.

² A survey of civil servants carried out by the Cabinet Office in May 2020, to see how government officials have been affected by the coronavirus pandemic.

4. Digital capability

4.1. Over the past several years, the Serious Fraud Office's (SFO's) IT development activity has focused on providing a stable and secure case management system and upgrading its document review system. Investment in case systems has been a priority. Over the past few years, the SFO has developed a new document review system and an artificial intelligence system, Axcelerate, which have both delivered casework and efficiency benefits.

4.2. The SFO's IT operating framework has been built around the majority of staff accessing such systems from the office. As such, there has been limited opportunity or need for staff to work from home. At the advent of lockdown, the overnight shift to the majority of staff working from home and requiring access to such systems raised a number of new IT issues for the SFO.

4.3. The SFO's IT architecture and corresponding remote access capabilities were never designed to accommodate such a large number of staff working remotely. Consequently, the SFO's network has for the first time been put under a significant amount of pressure.

4.4. Early in April, the SFO's network had a maximum of 587 people logged on at one time, which represented 96% of the network's capacity. Being able to handle this level of remote traffic was a real challenge, but also showed that the business could continue to operate in the extreme circumstances of the pandemic.

4.5. However, this level of network traffic tested the system to breaking point, and there was concern that this level of usage could result in major disruption. Therefore, the SFO set in place a number of approaches to help prevent the network being overloaded. This included requesting staff to log on outside of peak times where possible, and to avoid accessing high demand evidence (such as large files and high definition videos). Unsurprisingly, some SFO staff told inspectors of their frustrations with very slow network speeds and how they had had to change their working patterns and times to be able to keep working in an effective way.

4.6. Given the focus on developing corporate IT systems, as set out in paragraph 4.1, little thought has been given to developing software and systems which would have aided user connectivity during lockdown. This strategic decision to develop the casework systems made sense, given the environment that the SFO was operating in; however, this meant that at the beginning of lockdown, the SFO had very few IT tools to support remote working or aid communication.

4.7. As a consequence of concerns raised in the past, there is no video conferencing system at the SFO, and laptop cameras and microphones are disabled. The only means of communication, therefore, are voice calls and email. The lack of connectivity was raised as a source of significant frustration by staff in our inspection and in the COVID-19 Cabinet Office survey, where 40% of respondents shared concerns about the lack of video conferencing.

4.8. The wide use of video conferencing by other organisations has brought into sharp focus the lack of video conferencing facilities at the SFO. An example of this is court hearings. The SFO is represented by external counsel at court hearings; SFO staff provide instructions in advance of these hearings and then receive the outcome of the hearing from counsel. In addition, they routinely sit in on hearings. However, in those hearings which continued throughout lockdown, all participants other than SFO staff were linked in via video, while SFO staff had to rely on the ability to listen in via telephone. Staff told us that this made them feel as though they were at a disadvantage, with a perceived lack of immediate involvement in hearings. Some staff also told us that the judiciary has, on occasion, expressed frustration at the lack of SFO video connectivity and its impact on the flow of the hearings. It should be noted, however, that no court hearings were abandoned as a result of the constraints of the SFO's IT capabilities.

The SFO recognises that not having video capability is a limitation

4.9. The SFO recognises that not having video capability is a limitation. Since lockdown, it has been working hard to adopt the necessary IT infrastructure and hardware to implement this capability. By working with its internet service provider,

the SFO is increasing its network's bandwidth and looking for solutions to activate laptop and microphone connectivity without the need for physical involvement by the office based IT staff.

4.10. In the weeks immediately preceding lockdown, in recognition of the potential for large numbers of staff to require access to the SFO's network and systems from outside of the SFO building, the SFO made a large scale purchase of RSA tokens³. This dramatic upscaling of remote access did cause a number of problems in the initial stages (immediately prior to and during lockdown).

³ RSA tokens are electronic tokens required to gain access to a network via a passkey.

4.11. The maintenance of the SFO's IT systems and hardware is primarily centralised within its office building. Therefore, issuing and setting up RSA tokens required staff to be in the office, so IT staff could set up their laptop access. Some staff experienced problems getting either a token, or access, or both in this early period.

4.12. Between January and May 2020, the number of RSA tokens issued by SFO IT increased by over 200 (a 40% increase). Staff we spoke to as part of this work highlighted their concerns and frustrations experienced at this time. However, the SFO moved quickly and within three weeks all staff requiring RSA token access had it.

4.13. The SFO's laptop and connectivity facilities are serviced by an in-house team. For new laptops to be set up and network connectivity established, physical intervention by the IT team is needed. This requires office attendance; it cannot be done remotely when staff are working from home. This has caused the SFO problems with providing 100% connectivity for all staff away from the office. The SFO acknowledges that a number of staff have had to be placed on special leave because of IT issues; for example, laptop breakdowns or other matters which would normally require physical intervention. Replacing non-functioning laptops or providing new laptops generally requires both a member of IT staff and the laptop recipient to physically visit the office. This has affected around 30 staff, who have been limited in what work they can usefully do whilst at home.

During the period of home working, the lack of provision of peripheral IT equipment was raised as a significant concern by many staff

4.14. During the period of home working, the lack of provision of peripheral IT equipment was raised as a significant concern by many of the staff we spoke to. Early in the lockdown, the contingency planning group made a firm decision that the SFO would not provide any additional equipment to staff working from home, other than those that had reasonable adjustments⁴. There were a number of

factors behind this decision, including the cost – which would have had budget implications – the difficulty of managing the wholesale couriers of equipment from the office to staff, and the associated risk of loss. The

⁴ Reasonable adjustments are changes to the work environment that allow people with disability to work safely and productively. Under the Equal Opportunity Act 2010, 'disability' includes: physical, psychological or neurological disease or disorder, illness, whether temporary or permanent

contingency planning group also anticipated that staff would only be working from home in such large numbers for the short term.

4.15. It is clear from our interviews that the decision not to provide peripheral equipment has caused some resentment from staff. When the COVID-19 Civil Service survey asked in which areas staff wanted more communication or support, access to tech and equipment featured in 69% of responses.

4.16. In our interviews, we were told that a number of staff had purchased their own screens and keyboards to make life easier while working at home. On some occasions, line managers had also purchased items for staff from their own pockets without any expectation of recompense. Staff were aware that some other civil service departments had quickly funded or provided such peripheral equipment for their staff and this has added to the resentment and frustration felt by SFO staff. It was fed back to us that the lack of equipment fuelled a feeling of not being valued.

4.17. The SFO has acknowledged, as events have progressed, that home working is no longer a short term situation. As a result, it is now reconsidering its position. We have been told that it is likely to provide additional equipment as is appropriate, and the contingency planning group has decided to reimburse staff up to £50 for monitors and up to £15 for keyboards/mice. This will cover purchases made from 23 March onward.

5. Communication

In the COVID-19 Cabinet Office survey, 92% of staff said that they were positive about the level of support from their managers and team

5.1. In our interviews and focus groups, we heard that staff and managers at the Serious Fraud Office (SFO) were very positive about the level and quality of communication since lockdown. In the COVID-19 Cabinet Office survey, 92% of staff said that they were positive about the level of support from their managers and team.

5.2. The contingency planning group who met to deal with the impact of the lockdown, as discussed in chapter 3, were very aware of the need to keep managers and staff up to date and as fully informed as possible. In the initial stages of the lockdown, discussions in the contingency planning group were routinely followed by an update email from the Chief Operating Officer to the senior management team, Human Resources Manager, Head of Communications and other key individuals at the SFO. The communications strategy was that this email should be used to cascade key messages through line management, to keep all staff informed of the developing situation and of any decisions. Managers were able to decide how they used the emails; we heard that some managers simply forwarded them, while others tied this in with verbal updates they held regularly with their teams. Generally, staff in our interviews and focus groups appeared aware of the updates and felt informed about the decisions made by the contingency planning group. This demonstrates that this route of communication worked well.

5.3. The contingency planning group's updates formed a fundamental part of the SFO's coordinated communications plan. Whilst these updates were key, the SFO has also used other methods to supplement and to keep staff up to date. Staff we spoke to felt that the initial office closure was handled well and the process of communication has been clear, as they have been kept very well informed throughout.

5.4. The SFO's intranet has also been crucial in aiding effective communication during lockdown. It has been well used by the organisation and welcomed by staff as a means to keep them informed. The SFO ensured that the weekly Executive Board meeting minutes were routinely and regularly shared to keep staff updated, and sent out quick updates of key organisational discussion and decisions.

5.5. The SFO's communication strategy has also been supported by managers. In all the conversations we had with managers, they recognised that they had a key role in engaging with their staff and

keeping themselves and their staff updated. Heads of Division held weekly divisional meetings with case controllers and other section heads. Some staff we interviewed said that they have never had so much contact with their managers.

5.6. Throughout lockdown, there has been a consistency in decisions and messaging, which staff have welcomed. Despite information being disseminated through a range of methods, staff we spoke to were quite happy that there was little ambiguity around the key messages they were receiving. This has helped reduce uncertainty and build confidence in senior management during COVID-19.

So that senior managers could hear the thoughts of staff early in lockdown, the SFO set up a dedicated email address for staff

5.7. So that senior managers could hear the thoughts of staff early in lockdown, the SFO set up a dedicated email address for staff to directly access the contingency planning group. This email address was for COVID-19 related questions or queries. Following consideration by the contingency planning group, responses were either fed back directly or answered on the intranet. This

approach was well used in the early stages of the pandemic and provided open and speedy responses which were welcomed by staff.

5.8. The SFO would have liked to be able to make the Director and Chief Operating Officer highly visible from an early stage, but owing to the IT infrastructure limitations, this could not be realised by direct video contact. The potential of placing video clips of the Director or Chief Operating officer on the intranet was also considered, but if a large number of staff accessed these, it could have placed excessive demand on an already stretched network. Even without video blogs, staff we spoke to in our focus groups felt as though communication had been well handled.

5.9. In an attempt to overcome the limitations of IT during the lockdown period, the Director joined conference call meetings across each of the divisions. This was to allow the Director to engage directly. We were told that even this approach encountered a number of difficulties because of the limitations of telephone conference calls. Because of the size of some of the divisions, the Director had to attend a number of separate telephone calls and, in some instances, this resulted in technical difficulties which prevented the Director's messages coming across clearly. Staff recognised that the Director tried.

5.10. On 18 March, the Director issued an open message on the intranet, explaining the situation and the SFO's approach. The Chief Operating Officer also posted corporate messages and blogs on the intranet for staff to read. Staff we spoke to remembered these updates and, while many appreciated the approach from the Director and Chief Operating Officer, some expressed a view that there could have been more contact from senior management across the lockdown period.

5.11. From early in the lockdown period, the SFO made the strategic decision not to provide excessive amounts of external communiques about the impact of COVID-19. Accepting that the organisation is not primarily a public facing one, it placed a statement on its website explaining how it was operating during the lockdown period. There was also an expectation that managers at all levels would provide information to their key links, and liaise with any external bodies as appropriate to their position in the organisation, to back up this message at a personal level.

6. Health and well-being

6.1. It is clear that the Serious Fraud Office (SFO) has been committed to the health and well-being of its staff during this difficult period. Communications throughout lockdown have been supportive of this corporate commitment.

6.2. The SFO closely followed central government and Public Health England guidance and directives from the initial stages of the situation. On 16 March, the contingency planning group encouraged staff to work from home following government advice, but the office remained open. When government advice changed on 23 March, an all staff email, an intranet announcement and divisional communications from Heads of Division all set out that staff should work from home. Some staff felt that this was a rigid approach and did not offer any level of flexibility. One example raised was an individual returning from a foreign country prior to lockdown, who was told by the SFO to follow government and Public Health England guidance and work from the office, rather than work from home in isolation. Some staff felt this approach did not give a personal or “SFO specific” feel.

6.3. One of the main sources of health and well-being information, advice and guidance to staff was the SFO intranet. Both formal guidance and blogs have included advice on taking suitable breaks while working from home, correct seating and setting up working with laptops. Advice and hyperlinks to a Healthwise assessment on home working were provided to help make sure staff were as comfortable as possible during the working day. Staff were also offered support through the employee assistance programme and access to an online general practitioner service. Whilst the general practitioner service did see a slight increase in usage, mainly around COVID-19 symptoms advice, the number of enquiries to the employee assistance programme changed little from the previous year.

6.4. There has been good support for staff with reasonable adjustments; the SFO ensured that equipment needed in accordance with these adjustments was quickly put into place and delivered to relevant staff members’ homes. However, the SFO acknowledges that it could not risk assess everyone’s home working environment. As discussed in chapter 4, the SFO decided not to provide any other peripheral IT equipment or office equipment, such as office chairs, to support home working. Some staff reported that they have experienced difficulties whilst working from home, such as having limited space and unsuitable seating, and that this was impacting their health and well-being.

The SFO has supported staff through the use of special leave

6.5. The SFO has supported staff through the use of special leave. As mentioned in chapter 4, a small number of individuals have been on special leave throughout the lockdown period because of IT problems that could not be easily remedied. In response to the lockdown, the SFO increased the five-day special leave allowance to ten days and gave Heads of Division latitude to apply special leave policy where necessary in excess of this. Where staff have been unable to work through no fault of their own, the special leave policy has been applied. Special leave has been used for staff with caring responsibilities, those who were shielding, or those who could not work remotely. Over the period covered by this inspection (16 March to 8 May) the SFO granted 399 working days of special leave.

There has been a strong focus on staff well-being during lockdown

6.6. There has been a strong focus on staff well-being during lockdown. We found numerous examples of well-being support on the intranet. Blogs have focused on the need for mental as well as physical well-being. Advice and tips on a range of topics have been made available, including the importance of exercising, proper working from home techniques, balancing childcare, creating a new daily routine and genuinely taking care of mental health. The organisation's learning vouchers have also been opened up to allow staff to use them for the Headspace app, which includes a range of mental well-being resources.

6.7. The focus on mental well-being has been well supported and driven by the SFO's own Mental Health and Well-being Group and Culture Change Team. The mental health awareness week was well supported and the event went down well. Managers appreciate the hard work and input from staff. Advice on self-help has been abundant; examples include:

- an SFO quiz published every Friday
- reading recommendations from the staff book club
- advice to call a colleague using the "supporting each other" list.

6.8. Whilst accepting its lack of a business video platform, the SFO has strongly supported staff using external video platforms on their personal devices for anything other than business purposes. Skype, WhatsApp,

Viber, Zoom and Google Hangouts, amongst many others, are clearly being used by staff and managers alike. This has been encouraged for keeping in touch virtually. Weekly team based quizzes and social drinks are being used, as are virtual yoga classes and meditation groups.

6.9. Whilst the majority of staff were able to work from home, the SFO had to have a small number of essential staff working from the office in the interests of business. This included a small number of staff from the IT team, Facilities Management, Finance, the Departmental Security Unit and the Digital Forensics Unit (DFU). Staff from the DFU and Facilities Management worked from the office throughout the period. The senior management team have expressed their gratitude to these staff for voluntarily attending the office throughout lockdown to enable work to continue. We noted in our interviews that some staff felt this was more of an expectation than a voluntary request, but as some of their colleagues had been absent on special leave, it appeared to inspectors that this was more a lack of understanding and communication than a management directive that staff should attend the office against their wishes.

6.10. The SFO's resourcing model relies on a high proportion of temporary staff. Throughout the pandemic, the SFO has supported temporary staff employed through agencies where it has been able to. The SFO's policy has been that temporary staff would continue to be paid if the SFO closed the office and they were unable to work through no fault of their own. Around five or six temporary staff have been unable to work because of caring responsibilities or digital issues, and while this is essentially an issue for the contract agency and not the SFO, the SFO decided not to break such contracts and has paid the agency 80% of the individuals' salaries. To minimise the number of temporary staff affected, the SFO has been flexible about moving work and resources around to ensure that temporary staff have been gainfully employed.

6.11. Amongst individuals that have attended the SFO's offices through lockdown, we found mixed opinions about how effectively their health and well-being had been supported. Staff were provided with meals to limit the need for them to leave the building. The SFO also assisted with travelling to and from the office by paying taxi fares or parking costs. However, when in the office, we were told that hand sanitiser was not easily found, and that social distancing signage was not in place – and was difficult to achieve in some of the smaller offices (the DFU being an example quoted regularly to inspectors).

6.12. We were also told that there were cleaning issues in the DFU at the start of lockdown. In an attempt to alleviate the pressures on space in

the DFU, staff were put on split shifts in two separate teams to reduce the risk of contamination between the teams. However, on occasion, it seems that a decision was made not to carry out this split at weekends, as staff from both teams worked together.

Annex A

Inspection framework

Inspection question

How effective was the Serious Fraud Office's immediate response to the COVID-19 pandemic?

(An inspection of action and activity by the SFO between 16 March and 8 May 2020)

Sub-sections

The following were the lines of enquiry that featured as the core question set for the inspection.

Digital capability

- There were clear routes for making decisions to support the IT infrastructure that was needed to be able to conduct day to day business in an effective manner.
- All staff had access the right kit and appropriate access rights to allow for business to operate in line with the business continuity plan and to process work in an efficient way.
- There was an effective level of internal support to deliver work in line with need through an effective IT platform.

Communication

- There was a clear internal communications strategy in place which supported the immediate changes needed.
- Communications to staff were clear and unambiguous.
- All staff understand what they needed to do and what they were expected to do to support the delivery of the business.
- There was a clear external communications strategy in place which supported the immediate changes needed.
- The SFO's communication strategy took account of the immediacy of messaging, using the most appropriate methods and flexing as necessary as the nature of the crisis/lockdown changed.

Human resources – health and well-being

- The SFO supported staff with clear human resources advice and guidance, which was in line with government advice.
- The SFO provided effective support for all staff throughout the initial stages of the pandemic and as things developed and changed.
- Staff in the SFO were supported and, where it was necessary for them to travel or attend court/offices, there was clear advice about how to stay healthy.
- Staff impacted by the pandemic were supported by policies and there was consistent and fair application of policy across the SFO.
- Staff felt supported in their health and well-being throughout this period.

Business continuity planning

- The SFO's business continuity plan was effective in setting out how it would react to a major disaster.
- The business continuity plan was enacted effectively, with lines of communication being clear and staff understanding their roles and responsibilities.
- A clear route for decision making was established, in line with the business continuity plan.

HM Crown Prosecution Service Inspectorate

London Office

7th Floor, Tower
102 Petty France
London SW1H 9GL
Tel. 020 7210 1160

York Office

Foss House, Kings Pool
1–2 Peasholme Green
York, North Yorkshire, YO1 7PX
Tel. 01904 54 5490

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