

## IAG Specified Information Audit Report

### Background and purpose of the audit report

Police and Crime Commissioners (PCCs) are required to publish certain information to allow the public to hold them to account. The Police Reform and Social Responsibility Act 2011 requires an elected local policing body (the PCC) to publish any information specified by the Secretary of State. The Elected Local Policing Bodies (Specified Information) Order 2011 ('The Order') and amendment 2021, sets out the information which must be published. The Order ensures that PCCs will make available to the public information on:

- Who they are and what their role is
- What they spend and how they spend it
- How they make decisions
- What their priorities are and how they are performing
- Lists and registers

Since 2014 CoPaCC, an independent organisation designed to compare PCC's, have carried out annual assessments to judge whether the Office of Police and Crime Commissioner's (OPCC's) fulfil their statutory obligations for transparency as required by The Order (also known as SIO) based on the information published on their websites. Each year, the OPCC's who were judged as having reached a satisfactory standard were awarded the CoPaCC Open and Transparent Quality Mark. As of 2021 however, CoPaCC were no longer able to provide this service due to lack of funding.

With CoPaCC no longer carrying out their annual assessments, this left a gap in the independent scrutiny of the OPCCN. To rectify this, the OPCCN have created an annual auditing arrangement with members of the Independent Advisory Group (IAG) in order to ensure the office's ongoing transparency. The Home Office will also carry out assessments of the SIO's nationally. The IAG is a group of residents from different community backgrounds who share their views and advice with the aim of improving the quality of policing services. The diversity within the group and their knowledge of policing whilst remaining independent residents of Norfolk, makes the IAG members ideal candidates for carrying out an independent assessment of the SIO on the behalf of the OPCCN. For more information on the group please see here: [Independent Advisory Group | Norfolk PCC \(norfolk-pcc.gov.uk\)](https://norfolk-pcc.gov.uk/independent-advisory-group/)

## Findings for 2023 - Overall summary and recommendations

### Overall summary

The website is well presented, easy to navigate and contains a large volume of useful information. With respect to the specific SIO information the vast majority was successfully found, and in most cases, it was relatively simple to find. There was an overall improvement on the quality and consistency of the website from last year's audit. However, a few issues were identified:

1. It is still difficult to be confident that all the information found is current, apart from minutes of meetings. There has been an improvement since last year with a number of documents now having a last update and next review/update date – this approach should be a standard.
2. There are plenty of details on the grants/service contracts made. However there doesn't appear to be much feedback on whether the grants achieved what they were aimed to achieve and whether they provided value for taxpayer's money.
3. It would appear from the information that a lot of time and effort is spent undertaking work to satisfy HMCIS. Is this a good use of police time?
4. No annual statistics on complaints – the link for annual data went to the quarterly data.
5. There is a concern that the force allocates resources in a way that can be contrary to how the Police & Crime panel and the public view things.
6. Some of the information was only found via the SIO page – it would be helpful if the public knew the SIO page linked to information that allowed the public to hold the PCC to account.
7. This report has had to assume that the website is accurate when defining the scope of activity. For example, section 5d asks for information on each decision of significant public interest. There is a section on decisions but it's hard to comment on whether these are all the decisions of public interest made, particularly when they may have been made "in a meeting or otherwise".

### Recommendations

1. Agree a standard approach to documentation that allows the user to know that the information on the website is current and when it will next be updated. Use the standard on all documentation.
2. Provide more details and transparency on financial decisions and the success/failure of grants. Detail how successful or no grants were.
3. Ensure that the use of Police time on preparing data for HMCIS is appropriate.
4. Ensure there is an explanation of how the force allocates resources against the demands of and the crime panel and the public.
5. Promote the fact that the SIO page contains statutory information for the public to assess the performance of the PCC.

6. Keep an updated list of all the public meetings that should/do take place and all the decisions that have been taken.
7. Ensure where annual/quarterly reports are supposed to exist that they do or there is an explanation of why the data is not present. Provide annual data on complaints as required.
8. Monitor Freedom of Information request to see how successful the website is at providing the information the public needs

## Findings per section/IAG member

### Section One - In relation to the relevant office holders of the elected local policing body

**Audit Report Date: 10 January**

**Audit carried out by: Les Rowlands**

#### Section Content

- Name of relevant Office Holder
- Address for correspondence of each relevant office holder
- Salary of each relevant office holder
- Allowance paid to each office holder
- Register of interests
- Number of complaints brought to crime panel

#### Section Findings

- This information is readily available on the OPCC website. No further comment.

### Section Two -In relation to the staff (and, in relation to gifts and hospitality, also the relevant office holders) of the elected local policing body

**Audit Report Date: 10 January**

**Audit carried out by: Les Rowlands**

#### Section Content

- the number of members of the staff
- Proportion of Staff
- Organisational Structure
- Job Title, Responsibilities and Salaries

#### Section Findings

- There is information readily available on the OPCC website. No further comment.

## Section Three - In relation to the income and expenditure of the elected local policing body

**Audit Report Date: 10 January**

**Audit carried out by: Les Rowlands**

### Section Content

- Total budget of the elected local policing body
- The precept issued by the commissioner
- Each anticipated source of revenue of the elected local policing body
- Proposed expenditure of the elected local policing body
- Annual investment strategy of the elected local policing body
- Each crime and disorder reduction grant made by the elected local policing body
- Each item of expenditure of the elected local policing body exceeding £500

### Section Findings

- This information is readily available on the OPCC website.
- **HMCIS** - It is evident that a good deal of time and effort goes into anticipating potential disparities in service delivery within the force ahead of the regular inspections by HMCIS although no significant shortcomings are identified within Norfolk Police's approach. As an outside observer the only consideration would be how resource intensive is all this work to satisfy HMCIS. It would be helpful to know the resource input/ financial/ workforce hours). In layman's terms, if you are resourcing this issue are you therefore less able to put visible police officers out on the streets to catch criminals and or deter crime.
- **Service contracts** - As mentioned in last years' audit although there is information about how contracts are awarded, for example to domestic violence providers EG: Leeway 2/10 £43,028 2/10 £319,54800 2/10 £26,450.00 etc. Similarly, St Giles Trust, Open Doors, Sue Lambert Trust, The Change Portfolio etc. However, there does not appear to be any mechanism for how they are subsequently audited by the OPCC's office to guarantee "value for taxpayers' money" etc. The standard report template approach via a named OPCC official, with a sign off by the PCC, doesn't necessarily demonstrate on the website if the financial resources allocated have achieved their proposed objectives. Would applying SMART objectives to any allocation be helpful? Who audits the providers (if at all) and or is any meaningful feedback given to the PCC?

## Section Four - In relation to the property, rights and liabilities of the elected local policing body

**Audit Report Date: 10 January**

**Audit carried out by: Les Rowlands**

### Section Content

- The identity of any premises or land owned by, or occupied for the purposes of, the elected local policing body
- A copy of each contract with a value exceeding £500 to which the elected local policing body is or is to be a party
- A copy of each invitation to tender issued by the elected local policing body in relation to a contract which the body expects will have a value exceeding £500.

### Section Findings

- This information is readily available on the OPCC website. However, comments made at the Police & Crime Panel meeting tends to reflect the general unease throughout the county at the loss of police stations and therefore an obvious loss of visible police presence within key local communities. Large hubs are all very well but they are essentially anonymous and often far away from the residents they serve. I also find relying on SNAP meetings to identify where visible policing should be targeted unscientific as SNAP meetings, as presently constructed, are very poorly attended by members of the public.

## Section Five - In relation to the decisions of the elected local policing body

**Audit Report Date: 08/01/2024**

**Audit carried out by: Simon Guest**

### Section Content

- The date, time and place of each public meeting to be held by the elected local policing body
- The agenda for each public meeting held by the elected local policing body, and any report or other document that is the subject matter of an item on the agenda
- The minutes of each public meeting held by the elected local policing body, and of each meeting which is not a public meeting but at which matters of significant public interest arising from the exercise of the body's functions are discussed
- A record of each decision of significant public interest arising from the exercise of the elected local policing body's functions, whether made by the body at or as a result of a meeting or otherwise.

## Section Findings

- As per last year's audit, this report has had to assume that the website is accurate when defining the scope of activity. For example:
  - section 5a asks for date and time of each public meeting and provides a list of public meetings. I cannot comment whether this is all the public meetings that have taken place.
  - section 5d asks for information on each decision of significant public interest. There is a section on decisions but it's hard to comment on whether these are all the decisions of public interest made, particularly when they may have been made "in a meeting or otherwise".
- Most of the information was easy to find and it was all clear. Some of the documentation, particularly the policies, could only be found via the SIO direct link which is not good enough - the general public won't understand that unless it is made clearer.
- Not always clear whether the information is up-to-date but a significant improvement on last year. Some documents had a date and a next review date which is helpful and it would benefit if all documents had this. Other documents had an issue date whilst some documents had no dates - not clear for either of these whether the information is current.

## Section Six -In relation to the policies of the elected local policing body

**Audit Report Date: 08/01/2024**

**Audit carried out by: Simon Guest**

### Section Content

- The policy of the elected local policing body in relation to the conduct of relevant office holders, including procedures for the handling of qualifying complaints and conduct matters
- The policy of the elected local policing body in relation to the making of decisions of significant public interest
- The policy of the elected local policing body in relation to records management
- The policy of the elected local policing body in relation to the handling of qualifying disclosures

## Section Findings

- Most of the information was easy to find and it was all clear. Some of the documentation could only be found via the SIO direct link which I don't think is good enough - the general public won't understand that unless it is made clearer.
- It would be helpful if all policy details were kept in one place and could be accessed directly.
- Similar issues on how you know if the information is up to date as with section 5, but an improvement on last year.

## Section Seven - In relation to the prevention of crime and disorder

**Audit Report Date: 09/01/2024**

**Audit carried out by: Simon Guest**

### Section Content

- A copy of any report required by the elected local policing body from the responsible authorities for a local government area
- Key national priorities for policing
- HMICFRS Inspections and Reports
- Reporting in relation to complaints

### Section Findings

- Most of the information was easy to find and it was all clear. Some of the documentation could only be found via the SIO direct link which I don't think is good enough - the general public won't understand that unless it is made clearer.
- The data appeared to be up-to-date.
- No annual data available on complaints.

## Section Eight - In relation to the independent custody visitor arrangements

**Audit Report Date: 09/01/2024**

**Audit carried out by: Simon Guest**

### Section Content:

- Information as to the operation of the arrangements

### Section findings:

- Data readily available and easily accessed under custody visiting, available on the "Get Involved" section of the website.

## OPCCN response to the Overall summary and recommendations

1. This has been raised with the OPCCN staff, and as mentioned above an improvement has been made with documents labelled with creation dates and review dates. A reminder will be provided to the OPCCN staff and new staff will be provided with an induction email or meeting (whichever is possible) to outline aspects of Information Management such as dates on documents. Additionally, the Performance and Scrutiny team are planning several workshops and training for the office as a whole and this aspect will be included within this training set. The team will investigate a new set template for the office to ensure dates are included as standard.
2. The grants under the Ministry of Justice (MoJ) Victims Formula Based and General Grants are reported on twice a year (October covering April-September outcomes and April covering a full financial year). The MoJ matrix provides a full breakdown of referrals, clients supported, demographics, new initiatives for those with Protected Characteristics and finances. Each organisation also has an annual 'health' check for their governance, policies, insurances, DBS (Disclosure and Barring Service)/CRB (Criminal Records Bureau) and annual accounts. For those who are both funded by the MoJ and the core commissioning budget, quarterly contract/grant monitoring reports and meetings take place. It is at these meetings where we address critical success factors, KPIs/outcomes/outputs, and victim case studies. Commissioned services are also covered in the annual report which can be found here: [Performance | Norfolk PCC \(norfolk-pcc.gov.uk\)](https://www.norfolk-pcc.gov.uk/performance). I have noted that in last year's audit we advised we would action putting a link on the grant funding page to the decision notices to give individuals access to the decisions and grant agreements they may wish to gain further insight on. This had not been actioned but has now been done.
3. HMICFRS inspections and reports are statutory, inspected externally and used by the Police and Crime Panel to aid their scrutiny responsibilities. We feel it may be beneficial to organise having an input with IAG members to outline aspects of scrutiny and performance, such as the HIMCFRS requirements.
4. Responses to HMICFRS inspections and reports do have a direct impact on the provision of policing services in Norfolk by ensuring best practices are put in place. This aspect can also be covered in an IAG input and information put onto the website if appropriate to explain this further. During the quarterly Police Accountability Meeting (PAM), the Chief Constable and Police and Crime Commissioner discuss Norfolk's policing priorities. One of which is 'Visible and Trusted Policing', the discussions around this shows the priority given to ensuring an effective local policing resource remains available to deal with community issues. Additionally, the public are encouraged to ask questions to be answered by the Chief Constable and Police and Crime Commissioner. These can be found within the meeting agendas and minutes on our website here: [PCC Accountability Meeting | Norfolk PCC \(norfolk-pcc.gov.uk\)](https://www.norfolk-pcc.gov.uk/pcc-accountability-meeting)
5. After the audit process of the Specified Information Order page, our communications team provides social media updates to promote the work that must be published as well



as the audit process itself. We will work with the communications team to see if there is anything further that can be done to promote the SIO and the information it holds.

6. The Scheme of Governance and Consent is what governs our activity, including a 'decision making and accountability framework' to show how decisions are made. It may be worth making the decision notices page more robust in its explanation around this area.
7. Annual statistics are provided via the link from the Specified Information Order page of the OPCCN website to the IOPC website. However, the IOPC label the annual statistics as 'Performance Data – Quarter 4', which does not make it clear that it holds all statistics for that year up to and including the 4<sup>th</sup> quarter. We have raised this with our IOPC liaison who has spoken with the IOPC performance team. They have confirmed this is something they have been working on and are looking at the descriptions for the statistical bulletins to make them clearer.
8. We review all FOI requests to monitor and identify any emerging issues or trends in the information being requested to ensure that this is clearly labelled and made available to the public.

## **OPCCN Response to other comments and feedback from IAG**

### **Sections One and Two**

#### Section One

No issues found – no further comment required.

#### Section Two

No issues found – no further comment required.

### **Sections Three and Four**

#### Section Three

These issues are responded to in the 'OPCCN response to the Overall summary and recommendations' above. And have further suggested that an input with IAG members may be beneficial to aid their understanding of the performance and scrutiny roles undertaken by the OPCCN on behalf of the PCC. I have fed back to the commissioning team regarding the SMART objectives via this report to see if this is something that is actionable. Additionally, the commissioning team are working with the communications team to show a spotlight on getting the work of commissioned services out on our media platforms.

## Section Four

Information readily available on the website. However, the additional comments have been noted and fed back to the Senior Management Team.

## Sections Five and Six

### Section Five

We include all dates of our next scrutiny meetings in the PCC Accountability Meeting (PAM) agenda, which is in the public domain on our PAM webpage here: [PCC Accountability Meeting | Norfolk PCC \(norfolk-pcc.gov.uk\)](#) The page also shows when the next meeting will be held. Our social media page advertises this meeting as we request questions from the Norfolk public as well as offer spaces for people to attend in person.

A summary of the Out of Court Disposals Scrutiny Panel meetings are published on our Scrutiny webpage, and this contains the date of the next meeting.

If one of our meetings is postponed or cancelled for any reason, then we do publish this announcement on the relevant webpage (e.g., following the recent PAM postponement) to ensure we are always being transparent.

### Section Six

There is a document library which houses all documents that sit on the website and one of the selectable categories is 'policies and plans' which brings up all the policies that are available on the website, so it is felt this would not be reasonable and proportionate to create a new page to monitor and maintain solely for policies.

I am pleased to see an improvement has been noted regarding clarity on whether documents are up to date. We are aware that further improvements are required, and remedies are noted in the 'OPCCN response to the Overall summary and recommendations' section above.

## Sections Seven and Eight

### Section Seven

Will discuss with the Communications team to see if anything further can be done to advertise the SIO page. The search function will also help the public to navigate the website and find relevant pages. However, it is not possible to have separate pages for all the information that we are required to publish, hence the requirement for the SIO page to house this information.

### Section Eight

No issues found – no further comment required.

## **Audit Conclusion**

The OPCCN are grateful to the members of IAG for taking the time to carry out their independent audit of our website. There are elements of the feedback which the OPCCN have already rectified or taken steps to rectify comments that have come from this year's audit. Overall, the OPCCN are pleased that it is working to provide a transparent service to the people of Norfolk. The Complaints and Compliance Manager will engage with IAG in August 2024 to ask three to four IAG members (should this year's audit team no longer wish or are unable to participate) to carry out the second annual audit in October. Should new members become auditors, they will receive training in September 2024 to ensure they are happy with the process and report writing. The OPCCN will also seek to attend some IAG meetings to grow knowledge and increase engagement between the IAG members and the Performance, scrutiny, and governance team to assist IAG members in undertaking future audits.