



NORFOLK
CONSTABULARY
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ANNUAL GOVERNANCE STATEMENT FOR THE POLICE AND CRIME COMMISSIONER FOR NORFOLK AND THE CHIEF CONSTABLE OF NORFOLK 2021/22

Significant leadership changes arising during the period covered by the Annual Governance Statement

During 2021/22 there was a significant change in terms of the most senior leadership roles of the Police and Crime Commissioner (PCC) and Chief Constable.

Following an election on 6th May 2021, Giles Orpen-Smellie was elected the new Police and Crime Commissioner for Norfolk taking up his post on 13th May 2021. One of the first actions the PCC had to take was to appoint a new Chief Constable after the retirement of former Chief Constable Simon Bailey. Following a full recruitment process in line with requirements from the Home Office and College of Policing, Paul Sanford was appointed Chief Constable on 2nd December 2021. Prior to this Paul had been Deputy Chief Constable of Norfolk and held the role of Temporary Chief Constable in the period following Simon Bailey's retirement up to the permanent appointment.

The PCC's other key responsibility was to draw up his new Police, Crime and Community Safety Plan. The PCC announced that the previous plan drawn up by his predecessor would still apply for the first year of his term and his new plan would run from 2022-2024. The financial accounts 2021/22 therefore reflect the priorities of the previous plan.

However, this Annual Governance Statement (AGS) does consider the period up to the point the accounts are finalised following a full external audit and therefore as the new plan runs from 1st April 2022 the priorities of this plan are also considered in the AGS where appropriate to do so.

The Office of Police and Crime Commissioner for Norfolk (OPCCN) has also taken on responsibility for the Norfolk Community Safety Partnership and the governance of the Partnership sits within the OPCCN who report to the County Council.

1. Background

- 1.1 This Annual Governance Statement (AGS) covers the financial year 2021/22 but extends to cover the period to the signing of the Statements of Accounts in April 2024. This statement is an opportunity to demonstrate compliance with the Code of Corporate Governance and the CIPFA Financial Management Code.
- 1.2 The Police and Crime Commissioner (PCC) and the Chief Constable for Norfolk are responsible for ensuring that their business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.
- 1.3 In discharging this overall responsibility, the PCC and Chief Constable are also responsible for putting in place proper arrangements for the governance of their affairs and facilitating the exercise of their functions, which includes ensuring a sound system of governance (incorporating the system of internal control) is maintained through the year and that arrangements are in place for the management of risk.
- 1.4 The Corporate Governance Framework, which sets out how governance 'works' for the PCC and Chief Constable, can be found on the PCC's website (www.norfolk-pcc.gov.uk) or may be obtained from the Office of the Police and Crime Commissioner for Norfolk, Building 7, Jubilee House, Falconers Chase, Wymondham, Norfolk, NR18 0WW.
- 1.5 This Framework includes the joint Code of Corporate Governance (the Code) which is consistent with the principles of the CIPFA/SOLACE Framework: Delivering Good Governance in Local Government [April 2016] (as expanded by a Guidance Note for Police [June 2016]).
- 1.6 The PCC's and Chief Constable's financial management arrangements conform to the governance requirements of the latest CIPFA Statement on the Role of Chief Financial Officers in Policing issued March 2021.
- 1.7 This AGS also explains how the PCC and Chief Constable have complied with the Code and also meets the requirements of Regulation 6 of the Accounts and Audit (England) Regulations 2015 in relation to the review of the effectiveness of the system of internal control and the publication of an annual governance statement.

2. The Purpose of the Governance Framework

- 2.1 The governance framework comprises the systems and processes and culture and values by which the PCC and Chief Constable are directed and controlled, and the activities through which they account to and engage with the community. It enables the PCC and Chief Constable to monitor the achievement of their strategic objectives and to consider whether those objectives have led to the timely delivery of appropriate, cost-effective services, including achieving value for money.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve

policies, aims and objectives; it can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the PCC's and Chief Constable's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them effectively, efficiently, and economically.

- 2.3 However, good governance is not only about processes, rules and procedures. The governance framework should be applied in a way which also demonstrates the spirit and ethos of good governance. Shared values which are integrated into the culture of an organisation and are reflected in behaviour and policy are essential hallmarks of good governance.

3. The Governance Framework

- 3.1 The Chief Constable is responsible for operational policing matters, the direction and control of police officers and police staff, and for putting in place proper arrangements for the governance of the Constabulary. The PCC is required to hold the Chief Constable to account for the exercise of those functions and those of the persons under the Chief Constable's direction and control. It therefore follows that the Commissioner must satisfy himself that the Constabulary has appropriate mechanisms in place for the maintenance of good governance, and that these operate in practice.

- 3.2 The PCC has adopted a Corporate Governance Framework (including the Code of Corporate Governance) and a Scheme of Governance and Consent which includes Financial Regulations and Contract Standing Orders. These are reviewed periodically in accordance with requirements.

- 3.3 A governance framework has been in place throughout the financial year 2021/2022 (ending 31 March 2022) and [up to the date of the approval of the Statements of Accounts]. There was an opportunity to review and amend the governance framework to reflect the new PCC arrangements and this work is progressing well at the time of writing this report.

- 3.4 The key elements of the systems and processes that comprise the PCC's and Chief Constable's governance arrangements and how these adhere to the seven principles in the Code are set out below: -

Principle A – Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

- 3.5 The Police Code of Ethics, produced by the College of Policing, describes the principles that every member of the policing profession in England and Wales is expected to uphold and the standards of behaviour they are expected to meet. This Code applies to all those who work for the Constabulary, be they police officers, police staff, contractors or volunteers. Staff have been made aware of the Code of Ethics and its implications. Policies, procedures and training products are reviewed in line with the Code and it is central to decision making using the National Decision Making Model. Where there are breaches of the Code of Ethics or the Standards of Professional

Behaviour there is a positive duty to report these matters. The Joint Professional Standards Department receives such reports, and these are investigated appropriately and in accordance with Police Regulations. A Code of Conduct based on the Code has also been adopted by the PCC and staff of the OPCC.

- 3.6 Following the enactment of the Police and Crime Act 2017, several Police Regulations changed on 1st February 2020 and these changes include the Chief Constable no longer being the appeal body for complaints from the public with the PCC now becoming the review body. Appeals are now referred to as a 'right to review'. Other changes include less serious misconduct matters being dealt with as 'Practice Requiring Improvement' which will involve line managers in improving the officer's performance rather than instigating formal misconduct proceedings. The OPCCN and the Constabulary continue to work together to consolidate the implementation of the new regulations and processes. The OPCCN appointed a part time Police Complaints Review Officer to deal with the new process and they have been in post since January 2020. The implementation of the new model has now been in operation since February 2020 and although there have been no issues there is a high volume of requests being submitted and the OPCCN have looked at options for additional resourcing to assist the part time Police Complaints Review Officer role to ensure the efficient and effective delivery of the service. In addition, regular reporting on the number of complaint reviews is carried out through the Norfolk Police and Crime Panel Complaint's Sub-Panel.
- 3.7 Formal policies also exist in respect of whistle blowing, public complaints, anti-fraud and corruption, declaration of business interests, gifts, loans and hospitality and disclosable associations. An Ethics Committee has been established to enable staff to raise for consideration ethical issues affecting the Constabulary to enable further improvement in the transparency, professionalism and ethical approach of staff, policies and procedures to such issues. A Joint Integrity Board has also been established with the aim of securing the internal confidence of staff and officers in the fair application of policy and process in matters of integrity and ethics and to ensure that the organisations manage risk and learn from cases to improve the service provided.

Principle B - Ensuring openness and comprehensive stakeholder engagement

- 3.8 The OPCCN's website contains details of the meetings the PCC holds with the public, partners, Chief Constable, Audit Committee and Police and Crime Panel. Agendas, reports and minutes are available for public scrutiny where appropriate and social and digital media are frequently used to inform people unable to attend and to summarise meetings and key decisions.
- 3.9 The Constabulary offers regular, direct updates via its social and digital channels including Twitter, Facebook, Instagram, Next Door, LinkedIn, the force website, and indirectly via the local media parish newsletters and parish and council meetings. In addition, members of the public can sign up to the free Police Connect service to receive directly details of local crimes, initiatives and engagement opportunities via e-mail, voicemail or text.

- 3.10 The Constabulary has a Communications and Engagement Strategy, and this sets out how the force will effectively engage with the residents of Norfolk in accordance with Section 34 of the Police Reform and Social Responsibility Act 2011. Key aims include actively engaging with local communities, using offline platforms and online digital technology to reach a wider audience, ensuring officers and staffs have a clear understanding of expectations, working with partners, and acting on feedback to ensure we meet needs and requirements.
- 3.11 Representatives of the PCC attend meetings regularly to ensure that the arrangements the Constabulary has in place are effective. The PCC's Office (OPCC) also has its own Communications Strategy and Engagement Plans setting out how it will obtain the views of the community and victims of crime regarding policing. The OPCCN has a Consultation and Engagement Officer to review, develop and deliver its engagement activities and oversee delivery of the Engagement Strategy. Following the PCC elections in May 2021 the Communications Plans and Engagement Strategy has been updated to take account of new PCC priorities.
- 3.12 The PCC held a countywide budget consultation asking Norfolk people whether they agreed to a precept rise for 2022/23. Key partners were also consulted. The results of the police budget 2022/23 consultation show that 49% of those who took part said they would be prepared to pay extra through the policing element of their council tax. The PCC holds regular public meetings (PCC Accountability Meetings) to hold the Chief Constable to account and hosts online surgeries for the public to engage directly with the PCC.
- 3.13 The OPCC manages a key independent advisory panel, the Independent Advisory Group (IAG).
- 3.14 The Constabulary measures the satisfaction of service users through the use of victim surveys and reports to the Office of the PCC on levels of satisfaction as one of the agreed Police and Crime Objectives. It also reviews public confidence through monitoring of results through the Crime Survey of England and Wales. In addition, Norfolk Constabulary undertakes a public perceptions survey that can be broken down to district level, which can be used to assess qualitative performance on feelings of safety and community confidence in policing and will shortly be running a hyperlocal survey amongst it's followers to understand what information and platforms they would like us to use.
- 3.15 Norfolk Constabulary collaborates extensively with Suffolk Constabulary as it has done since 2008. This formal collaboration is across a range of services including operational policing and back-office functions. The PCC is required to give approval to collaborative opportunities before they can commence. The PCCs of Norfolk and Suffolk meet during the year to discuss and discharge their governance responsibilities. In addition to this there are governance arrangements that cover operational managers and Chief Officers. The main drivers have been to maintain the effectiveness of operational and organisational support and to drive out savings through economies of scale and efficiencies in order to protect front line resources wherever possible.

- 3.16 There are also services that are subject to ongoing regional collaboration. A Seven Force Strategic Network has been established (this is essentially the three strategic collaborations of Norfolk / Suffolk, Kent / Essex and Bedfordshire / Cambridgeshire / Hertfordshire). This network looks for opportunities to converge processes and practices where relevant, and also looks for wider collaboration opportunities where it is practical to do so. The network is governed jointly by the seven PCCs and seven Chief Constables.

Principle C - Defining outcomes in terms of sustainable economic, social and environmental benefits

- 3.17 The PCC elections in May 2020 were cancelled due to the COVID-19 pandemic and the elections took place on 6th May 2021. Giles Orpen-Smellie was elected the new Police and Crime Commissioner for Norfolk taking up his post on 13th May 2021. The PCC announced that the previous plan drawn up by his predecessor would still apply for the first year of his term and his new Police, Crime and Community Safety Plan would run from 2022-2024. The financial accounts 2021/22 therefore reflect the priorities of the previous plan as shown below.
- 3.18 The former PCC consulted widely on his Police and Crime Plan (2016/20) following his election in 2016 and this was published in March 2017. The Plan set out seven core priorities for Norfolk and outlined the PCC's vision for tackling and preventing crime, protecting the most vulnerable and supporting victims.

The seven priorities were: -

- Increase visible policing
- Support rural communities
- Improve road safety
- Prevent offending
- Support victims and reduce vulnerability
- Deliver a modern, innovative service
- Good stewardship of taxpayers' money.

- 3.19 The Plan has been monitored through two public forums:

- The Police Accountability Forum (PAF) where the Chief Constable is held to account by the PCC for delivery against the Police and Crime Plan.
- The Norfolk Police and Crime Panel (PCP) where the PCC's work is scrutinised by the Panel for delivery against the Police and Crime Plan.

The public can submit their questions to both the PAF and the PCP, and this aids transparency and community confidence in policing potentially and provides additional governance.

All these performance reports are published on the OPCCN website [PCC Accountability Meeting | Norfolk PCC \(norfolk-pcc.gov.uk\)](https://www.norfolk-pcc.gov.uk)

and the Police and Crime Panel section of the Norfolk County Council website:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/crime-and-disorder-partnerships/police-and-crime-panel>

- 3.20 There is a co-ordinated process for strategic and medium-term financial planning (MTFP) that uses Outcome Based Budgeting (OBB) principles. The budget for 2021/2022 proposed by the PCC was based on an increase in the council tax (following consultation) of £14.94 per annum for a Band D equivalent property. The increase in the precept has been used to invest in and improve services for the communities of Norfolk. The PCC's proposal was supported by the Police and Crime Panel. Savings were required to balance the budget but through central government funding for Operation Uplift it is possible to increase police officer numbers. The work involved in preparing the budget and the MTFP requires close liaison with operational staff and budget managers followed by a detailed process of scrutiny and challenge by Chief Officers and the PCC and OPCC Executive in order to ensure that the MTFP can finance the strategic aims of the Constabulary and the PCC.
- 3.22 There is a clearly defined corporate performance management framework. Objectives and key performance indicators are established and monitored both at a corporate and local level. Regular reports are made to senior managers, the Command Team, the Commissioner and the Norfolk Police and Crime Panel on performance against objectives. This includes detailed analysis and scrutiny of performance and compares performance against the most similar family of forces.
- 3.22 Proposals for collaboration go through a detailed process, designed to ensure that all options are considered, outcome and risk assessed and that all parties can sign up to formal agreements in the knowledge that future policy, performance and resource levels are recognised at the offset. Dedicated resources are in place to support those units subject to Norfolk / Suffolk collaboration, including the formulation of detailed business cases. The business cases are subject to review by senior officers and the Joint Chief Officer Teams of the two constabularies. Proposals are further discussed before final sign off by the two PCCs. This is underpinned by formal agreements covering the legal aspects of collaboration. A similar process applies to regional proposals.
- 3.23 A Programme Management Office oversee the planning, implementation and delivery of Norfolk and Suffolk Constabularies' overarching change programme in accordance with the two force's strategic priorities and reports upwards via the Joint Strategic Planning and Monitoring Board meeting into the Joint Norfolk and Suffolk Chief Officer Team.

Principle D - Determining the interventions necessary to optimise the achievement of the intended outcomes

- 3.24 Norfolk and Suffolk Constabularies gather data and intelligence from a range of sources to produce an annual Strategic Assessment. The Strategic Assessment considers all relevant internal and external factors that might impact upon policing, crime and disorder at county and local level, highlighting emerging issues, risks and threats. All

operational issues are risk assessed using the nationally recognised Management of Risk in Law Enforcement (MoRiLE) framework. The Strategic Assessment is then used to inform the development and review of the Police and Crime Plans, and the local policing plans and performance frameworks. It also leads to the setting of the Operational Control Strategy for which there are identified strategic leads for each theme area. In 2021/22 the Control Strategy and overarching Strategic Assessment were also woven into the Norfolk Force Management Statement (FMS). Partners are consulted in the development of the Strategic Assessment and the final document is also shared with them to help aid their decision making and planning.

- 3.25 Norfolk Constabulary also produce an annual force management statement (FMS), which is a self-assessment that chief constables prepare and give to HMICFRS each year. The FMS explains the demand the forces expect to face in the foreseeable future and assesses this against the constabulary's workforce (capacity, capability and security of supply) and the extent to which current force assets will be able to meet the expected future demand. The FMS also assesses how the constabulary will change to cope with future demand and the potential effect of any residual risk of service failure.
- 3.26 The Constabulary undertakes strategic analysis in the form of strategic profiles. Where relevant, these are produced jointly for Norfolk and Suffolk, highlighting any cross force and single force issues. The profiles cover a range of strategic crime and thematic topics such as drug offending (e.g., drug market profile), whilst also looking at organisational issues such as Engagement in Policing profile. They provide a comprehensive account of the topic, taking into consideration any existing research or 'what works' evidence to inform strategic and tactical action plans and decision making. Partnership data is utilised wherever possible, and consultation is also undertaken with stakeholders outside of policing as a key part of the process. These strategic profiles are used to inform the overall Strategic Assessment and help operational decision making.
- 3.27 The Strategic Business and Operational Services (SBOS) department undertakes analysis, research, and improvement and evaluation activity across the Constabulary, covering strategic, operational, organisational and performance reporting. SBOS also leads on policy, corporate risk management, programme management, benefits identification and joint operational or organisational project work (including business analysis). Finally, SBOS also lead on compliance with the Home Office County Rules through a crime registry and audit function. The collaboration of these distinct areas of business within one department allows for more informed analysis to take place which could relate to any part of the organisation, whether operational or organisational. This collaboration also results in the greater use of a variety of techniques to aid tactical and strategic decision making and to formulate problem solving approaches. The department seeks to use an evidenced based approach to its work ensuring that 'what works' is considered as part of the Constabulary's problem-solving activity and evaluations are conducted to ensure lessons are learnt and successes identified. During 2022 SBOS reorganised slightly establishing a new Organisational Analysis function integrating risk management, benefits and the Force Management Statement (FMS). This new team will undertake quarterly reviews of the FMS that is produced annually, providing constant updates to aid decision making,

along with providing an ability to assist project managers in identifying trackable benefits from their delivery.

- 3.28 The SBOS department produces analytical work to support a number of forums and groups, including the Tasking and Co-ordination Group meetings and Performance and Accountability meetings, delivering strategic and tactical products which facilitate forward resource planning and the identification and management of threat, risk and harm, thereby minimising costs to the organisation. SBOS also produces analysis in collaboration with external organisations and partners (including ambulance, fire & rescue service, county council, youth offending team, and trading standards) to better understand performance in the context of shared demand.
- 3.29 SBOS is also one of the founding partners of the Norfolk Office of Data Analytics (NODA). NODA brings together local authority and police data to help inform 'whole system' analysis on high priority areas. NODA has developed during 2021/22 allowing the provision of its own dedicated if small analytical capability which has been utilised by the Constabulary. NODA played a key role in data provision during the COVID19 pandemic throughout 2021/22, linking data from different county services to help build a picture of the situation in a dynamic and joined up way, helping identification of the most vulnerable through multiple partnership datasets and working with the University of East Anglia on world class predictive forecasting of infection rates. The SBOS department supports the Constabulary in meeting its statutory and legislative requirements regarding information and data provision including the Annual Data Returns as set out by the Home Office and data requirements from HMICFRS. SBOS also provide data for a large proportion of Freedom of Information requests.

Principle E - Developing the entity's capacity, including the capability of its leadership and the individuals within it.

- 3.30 Norfolk and Suffolk Constabularies have continued to develop the Leading With CARE, Leadership Development Programmes for supervisors, middle and senior leaders. CARE is available to both officers and staff which are in the form of pathways for development, hosted and tracked on our learning management system. These pathways contain operational, management and leadership development and online content from the College of Policing. The pathways use the Performance Development Review (PDR) conversations throughout and incorporate other development tools such as 360-degree feedback, reflective practice, a shadowing scheme, mentoring and coaching (including trained and/or qualified to ILM level 5). Within the mentor pool there is a group of officers and staff with a particular interest in supporting the development of officers and staff from underrepresented groups.
- 3.31 Leadership apprenticeships are offered for police staff to replicate the qualifications offered to officers via the NPPF. Coaching skills for all managers and reverse mentoring is also part of our strategy to develop a coaching culture of leadership in the Constabularies. The development pathways have been complemented by CPD workshops to help embed the CARE behaviours (Connectivity, Accountability, Risk Competence and Energy) in the workplace. The officer promotion processes in both Constabularies use the CARE leadership behaviours for selection. A new operational

skills pre-promotion course has been developed for aspiring Sergeants to ensure they develop the knowledge and skills they need, in a timely way, before they are placed into their first Acting Sergeant role.

- 3.32 The Learning Management System (LMS), "The Best I Can Be", continues to expand with a greatly increasing amount of operational, personal and leadership content hosted on it. With the expansion, the LMS site has been re-designed and re-launched to improve customers experience allowing them to locate exactly what they need more easily. A number of new products have been developed including a dedicated tile to support the roll-out of the Modern Workplace Programme, an Onboarding package, which can be accessed by new-starters before they join and which provides a 'one-stop shop' for all Constabulary information a new starter needs in their induction period. In addition, a multimedia, fully interactive work experience programme for schools has been introduced which has been awarded the prize for Innovation by the National Learning Network and has also been nominated for the prestigious Tilley Awards in Policing. This package has the potential to make a significant contribution in attracting young people to Policing. Flexible blended learning technology will continue to develop in sophistication and grow apace, allowing access to learning 24/7, so increasing inclusion and continuing to reduce abstraction, travel and venue costs.
- 3.33 The Constabularies have designed and launched an electronic PDR process which makes the form more accessible, automatically links to the individual, their manager and senior managers and enables management reporting across the organisation to help drive performance improvement, succession planning, talent and career development. The launch of the new ePDR is supported by a dedicated site on our LMS which includes drop in surgery dates, a User Guide and a series of instructional videos explaining how to navigate the form. In terms of Governance, the People Board will continue the development, standardisation and monitoring the effectiveness of PDR via the management information generated.
- 3.34 Our Apprenticeship Programme is embedded well with the aim of providing training for officers and staff in emerging, hard to recruit or retain skills and to upskill our staff for 21 Century Policing. Managers are now fully engaged with the concept and are identifying opportunities for upskilling staff and for recruiting new people who have potential to develop, particularly in new skill areas. We currently have 71 live Apprenticeships across 13 different Apprenticeship Standards ranging from Level 3 (A level) to Level 7 (Master's) including leadership and management, intelligence and data analysts, digital and technical solutions, improvement practitioner and procurement. Both constabularies first Police Constable Degree Apprenticeships, the PCDA, started in June, working with our higher education partner, Anglia Ruskin University.

Principle F - Managing risks and performance through robust internal control and strong public financial management.

- 3.35 The PCC and Chief Constable have Risk Policies in place to ensure that the risks facing the organisation are effectively and appropriately identified, evaluated and reported. The Joint Norfolk and Suffolk (Constabularies) Risk Management Policy includes details of the risk management framework within the governance structure of Norfolk

Constabulary. It sets out risk management requirements and practices that should be undertaken; by whom and when and outlines the consequences of non-adherence. The policy supports a robust risk management approach for ensuring that strategic objectives are achieved and shows how risk is dealt with, by mitigation and/or escalation to the appropriate level in the organisations. A similar policy has been drawn up by the Norfolk Office of the PCC (OPCC). The Audit Committee routinely sees the Strategic Risk Registers.

- 3.36 Due to the introduction of the PCC's new Police, Crime and Community Safety Plan the Strategic Risk Registers (SRR) have been revised to map to the new priorities contained within the plan. The revised versions of the SRR are now regularly presented to the Audit Committee.
- 3.37 The Crime Registry and Audit functions for Suffolk and Norfolk, which are part of SBOS, carries out independent and rigorous audit of crime and incident recording. It provides an objective assessment of how the Constabularies are complying with the National Crime and Incident Recording Standards. The audit reports produced are reviewed by Chief Officers and if areas for improvement are identified, action is allocated and taken accordingly. As necessary, any areas of risk in relation to Crime Data Integrity are also raised at the Force Crime Data Integrity meetings and, where relevant, at Force performance meetings. They are also detailed on the risk register.
- 3.38 In 2019 Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services (HMICFRS) conducted a Crime Date Integrity Inspection which found an estimated 8700 crimes had been under reported. As a result, the force was graded as Requiring Improvement in this area. This created 6 Areas for Improvement (AFI) and 3 recommendations allocated to the force. Whilst the inspectorate identified outstanding leadership in this area of business, they found that staff did not understand the increasingly complex crime recording rules.
- 3.39 A Crime Data Integrity meeting chaired by the Assistant Chief Constable was established and precept funding was used to recruit a Crime Data Integrity Quality Assurance Team (CDIQAT) team to ensure all incidents are correctly recorded on notification to police, as they come to the control room. HMICFRS re-inspected the force in 2022 and removed the AFIs and recommendations as a result of the CDI compliance evidenced. Internal Crime Data Integrity audits show recent compliance rates of 96% which if graded would be expected to be either Good or Outstanding.
- 3.40 Even with the additional flexibility available to the PCC for precept increase in 2022/23; over the medium term, efficiencies will continue to be identified so that operational demand and cost pressures can be met. By the 31 March 2022 some £40m of annually recurring savings will have been found. Over the MTFP period to 2025/26 a further £2.9m has been identified. Reserves are forecast to reduce from £17.7m at 31 March 2022 to £12.0m by 31 March 2026 and these levels remain within the acceptable range defined in the Reserves Strategy of the PCC.

Principle G - Implementing good practices in transparency, reporting, and audit to deliver effective accountability

- 3.41 The Commissioner has a statutory duty to produce and publish an Annual Report which details performance for the previous year against the objectives and performance measures set in the Annual Policing Plan. Financial performance against the revenue budget, capital programme and levels of reserves is reported regularly through the Police Accountability Forum. The Annual Report and financial performance papers are published on the OPCC website.
- 3.42 The OPCCN continued to receive an annual award for meeting its statutory requirements on openness and transparency. The OPCC Transparency Quality Mark was previously issued by CoPaCC and assessed compliance with the Specified Information Order for Elected Local Policing Bodies. The OPCCN received a 'highly commended' award for the first time in 2020-21. Following on from this last award CoPaCC announced they would no longer be conducting their assessment process. The OPCCN has now planned an internal audit to ensure continued compliance in this area for 2021/22 which will include the additional requirements set out in the amended Specified Information Order published in May 2021 which was a recommendation from the governments PCC Stage One review. From 2022/2023, OPCCN has arranged for the Norfolk Independent Advisory Group (IAG) to take on the role of independent assessment to ensure the OPCCN maintains compliance with the Specified Information Order and the IAG have completed one assessment which is available on the OPCCN website.
- 3.43 The Audit Committee has overseen the full programme of internal and external audit activity. See paras 4.20 to 4.22.

4. Review of Effectiveness

- 4.1 The PCC and Chief Constable have responsibility for conducting an annual review of the effectiveness of the governance framework, including the system of internal control.
- 4.2 This review of effectiveness is informed by
- the work of executive managers within the Constabulary and the OPCC who have the responsibility for the development and maintenance of the governance environment,
 - the head of internal audit's annual report and
 - comments made by the external auditor and other review agencies and inspectorates.
- 4.3 A full report will be presented to the Audit Committee ahead of the sign-off of the accounts. The groups and processes that have been involved in maintaining and reviewing the effectiveness of internal control include the following:

Corporate Governance Working Group

- 4.4 This Group has been established to review the corporate governance framework and systems of internal control and to oversee the preparation of this Annual Governance Statement. The group comprises the Chief Executive of the PCC, the Director

(Performance and Scrutiny) OPCC, the PCC's CFO, the Chief Constable's Assistant Chief Officer, the Head of Strategic Business and Operational Services and one co-opted member of the Audit Committee. These officers are involved in the oversight of the governance framework and its processes and are able to review its effectiveness.

Internal Audit

4.5 Internal audit (delivered under contract by TIAA from 1 April 2015) provides independent and objective assurances across the whole range of the PCC's and Constabulary's activities and regularly presents findings to the Audit Committee of the PCC and Chief Constable. TIAA has taken a managed audit approach in conjunction with external audit to ensure that all necessary areas of compliance are covered. The audit programme for the year was prepared and agreed with the PCC and Chief Constable following a risk-based assessment. The managed audit approach has been developed successfully over past years, in agreement with external audit to bring further efficiency to audits. At each meeting of the Audit Committee the Head of Internal Audit also presents a 'Follow-Up' Report which sets out the numbers of implemented recommendations and those which remain outstanding.

4.6 The contract with TIAA ended on 30 June 2021. A tender exercise was undertaken. However, this did not result in a successful award. TIAA were reappointed until 30 June 2022. This did involve a short break in service and a revised audit plan for the year covering the main risk areas. This did not impact on the ability for the Head of Internal Audit to give an opinion as described below.

4.7 A fresh procurement exercise was undertaken, and the result is that TIAA were appointed as auditors for a further contract period.

4.8 Internal audit is required to give an overall opinion on the adequacy and effectiveness of the framework of the internal control and risk management environment.

4.9 The overall opinion for 2021/22 from the Head of Internal Audit is shown below:

“Reasonable assurance can be given that there is a generally sound system of internal control, designed to meet the organisation's objectives, and that controls are generally being applied consistently.

TIAA is satisfied that, for the areas reviewed during the year, for the Police and Crime Commissioner for Norfolk and Chief Constable of Norfolk Constabulary effective risk management, control and governance processes are in place.

This opinion is based solely on the matters that came to the attention of TIAA during the course of the internal audit reviews carried out during the year and is not an opinion on all elements of the risk management, control and governance processes or the ongoing financial viability or ability to meet financial obligations which must be obtained by the Police and Crime Commissioner for Norfolk and Chief Constable of Norfolk Constabulary from its various sources of assurance.”

- 4.10 Out of 12 audits, 8 received reasonable assurances, and four substantial assurances. One limited assurance audit relating to the prior year was reported in 2021/22 and more information on this audit is set out in paragraph 5.3.

External Audit and Other External Review Bodies

- 4.11 The external auditor (Ernst and Young LLP), was re-appointed by Public Sector Auditor Appointments in 2017). External Audit provides a further source of assurance by reviewing the annual accounts and value for money assessment and reporting upon internal control processes and any other matters relevant to their statutory functions and codes of practice. An unqualified audit report was issued on the 2020/21 Statement of Accounts in November 2021 together with an unqualified value for money conclusion. The External Auditor’s Annual Audit Letter was issued in December 2021, and it did not identify any matters to be addressed.
- 4.12 There was a new PSAA procurement process underway in the year of the accounts, and an announcement was made in autumn 2022 as to who the external auditor will be for the PCC and Chief Constable for the period beyond 2022/23. This for both the Constabulary and the OPCCN will be the current external auditors Ernst and Young LLP.
- 4.13 His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) assesses police forces across England and Wales under the Police Effectiveness, Efficiency, and Legitimacy (PEEL) inspection programme. A model of continuous assessment has been adopted to achieve a broader and more comprehensive understanding of force performance.
- 4.14 The Constabulary was last subject to a PEEL inspection between June 2021 and June 2022, with HMICFRS publishing their findings report in October 2022. A copy of the inspection report can be found on the HMICFRS public website: [PEEL 2021/22: An inspection of Norfolk Constabulary](#)

The Constabulary received the following gradings:

Outstanding	Good	Adequate	Requires improvement	Inadequate
Good use of resources	Preventing crime	Investigating crime	Treatment of the public	
	Managing offenders	Responding to the public		
	Developing a positive workplace	Protecting vulnerable people		

- 4.15 In addition to awarding these gradings, HMICFRS set the Constabulary eleven Areas for Improvement (AFIs). The progress that the Constabulary continues to make against each AFI is monitored through a monthly meeting chaired by the Deputy Chief Constable. HMICFRS will re-inspect these AFIs as part of the 2023 – 2025 assessment process.

- 4.16 Through the 2021 – 2022 PEEL inspection programme, HMICFRS separately assessed how good police forces are at disrupting serious and organised crime (SOC). The framework for this part of the inspection examined how well forces respond to SOC, both regionally and locally. HMICFRS published their findings report following their inspection of the eastern regional response to SOC in May 2023. The Constabulary was pleased to see the Eastern Region Special Operations Unit (ERSOU), which is made up of officers from across the region including Norfolk, receive a 'Good' grading. This was the highest grading awarded to any Regional Organised Crime Unit in the round of inspections. At a local level, Norfolk Constabulary received a 'Requires Improvement' grading, with four Areas for Improvement. Since the inspection, the Constabulary has made significant progress towards addressing these AFIs.
- 4.17 In November 2022 Andy Cooke, His Majesty's Chief Inspector of Constabulary, wrote to all Chief Constables with notification of the preliminary 43-force PEEL inspection schedule for 2023 – 2025 and the updated PEEL Assessment Framework (PAF), which outlines the core question and the characteristic of good for each, against which forces will be inspected. We anticipate that the field inspection stage of our PEEL assessment will take place in April 2024, with our final report likely to be published in August 2024. This is however subject to change and we await our formal notification letter from HMICFRS which will confirm the dates of our inspection activity.
- 4.18 The Constabulary continues to progress recommendations allocated to all forces in England and Wales by HMICFRS that result from their national thematic inspections. The following reports were published in 2022/23:
- [An inspection of how well the police tackle serious youth violence.](#)
 - [An inspection into how well the police and other agencies use digital forensics in their investigations.](#)
 - [An inspection of vetting, misconduct, and misogyny in the police service.](#)
 - [Twenty years on, is MAPPA achieving its objectives?](#)
 - State of Policing: The Annual Assessment of Policing in England and Wales 2021.
 - An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children.
- 4.19 Norfolk Constabulary was one of six forces that were inspected in November 2022 in relation to the police response to group-based child sexual exploitation (CSE). The report is expected to be published in autumn 2023.
- 4.20 Regarding data protection, data breaches continue to be reported via the appropriate channels. Each breach is investigated, and appropriate action and mitigation is taken to contain and manage any risk. The Deputy Chief Constables of Norfolk and Suffolk are the Senior Information Risk Owner (SIRO) and are involved in reviewing the high-risk data breaches that are considered for referral to the Information Commissioner's Office (ICO). Norfolk and Suffolk Constabularies made 5 referrals (2 Norfolk, 3 Suffolk) in financial year 2021/22. None of these have resulted in formal action from the ICO. 8 referrals (6 Suffolk, 2 Norfolk) were made to the ICO in financial year 2022/23. None of these have resulted in formal action from the ICO, however 3 are currently still under

review (1 Norfolk, 2 Suffolk). The 3 outstanding reviews with the ICO relate to the breach of personal data within FOI responses. The Constabularies immediately launched a response in relation to this incident resulting in the referrals to the ICO, a rapid review of processes and procedures, changes to internal practices and a detailed analysis of the data involved and who was impacted. The process of updating those individuals who need to be notified about an impact to their personal data is complete. Norfolk and Suffolk Constabularies have made 9 referrals (4 Suffolk, 5 Norfolk) so far in financial year 2023/24. 5 of these have been closed by the ICO and have not resulted in any regulatory action. 4 referrals currently remain open (1 Suffolk, 3 Norfolk).

- 4.21 The Chief Executive of the OPCCN is the Data Controller for that organisation and manages data breaches of which there have been none for the OPCCN during 2021-22.

Police and Crime Panel

- 4.22 The Police and Crime Panel provides checks and balances in relation to the performance of the PCC and scrutinises the PCC's exercise of his statutory functions. The Panel is independent of the PCC and consists of 3 county councillors, 7 district councillors and 2 independent co-opted members.

Audit Committee

- 4.23 The members of the Audit Committee are entirely independent people recruited for their scrutiny skills. They have no conflicts of interest and provide objective advice on audit and wider governance issues. The Committee provides advice, to the PCC and Chief Constable, on audit and governance issues and champions both audit and the embedding of risk management. Specifically, it receives and scrutinises the review of the system of internal control and agrees and monitors any action plans resulting from those reviews. The Committee regularly reviews its own performance and prepares an annual report for submission to the PCC and Chief Constable.
- 4.24 In addition to this the Committee also examines and considers the draft Annual Governance Statement and reviews the draft accounts of the PCC and Chief Constable to make recommendations in this respect. Also, it reviews the annual draft Treasury Management Strategy, monitors its application during the year and makes recommendations as appropriate.
- 4.25 Committee members have continued to receive briefings and training through the year.

5. Significant Governance Issues

- 5.1 In January 2023 the constabulary identified a data breach relating to a small number of Freedom of Information (FOI) requests for crime statistics. A technical issue led to raw data being included in digital files in FOI responses for crime statistics requested between April 2021 and March 2022. It related to 18 FOIs – which represents 1.3% of responses issued in a year by the constabularies. The data was hidden from anyone opening the files but shouldn't have been included.

- 5.2 As the audit of the Statement of Accounts had not been concluded, the constabularies were required to assess the impact on the accounts. To that end, the 2021/22 accounts include an updated disclosure on Events After the Reporting Period that outlines that the PCC and Constabularies recognise the issue but are not yet able to assess a liability to include in the accounts.
- 5.3 One internal audit undertaken in 2020/21 but reported in 2021/22 received 'Limited Assurance' (it should be noted that all audits relating to 2021/22 received either reasonable or substantial assurances):
- **Seized monies** – The result of the audit concluded with one urgent, six important and two operational recommendations. A follow up audit in March/April 2022 concluded that five recommendations had been implemented, one recommendation was not yet due, and one was overdue and a revised date for implementation had been requested was considered appropriate and approved.
- 5.4 All recommendations in Internal Audit Reports are subject to follow up with a detailed report being presented to each meeting of the Audit Committee and to the Joint Constabularies Organisational Board (Delivery) that is chaired by the Deputy Chief Constable. The recommendations from the above limited assurance audit will be included in this follow up process.
- 5.5 There was a need to re procure the internal audit service for Norfolk and Suffolk. TIAA were appointed after a tender process for a further contract period.
- 5.6 The timings of external audits have slipped in recent years due to pressure on resources in the audit firm, and this has put additional pressure on a small but effective constabulary finance team. There is reputational risk with not having audited accounts published on the PCC / CC websites by the statutory deadline of 30 November 2022. This date will be missed as the auditors cannot undertake their audit until after that date. There is an explanation on the website to help members of the public understand why publication will be after the statutory deadline. The deadline for future years will be 30 September of each respective year, and this may further increase the risk of not meeting publication dates from an external audit resource perspective.

Impact of Covid 19

- 5.7 As a result of the Covid-19 pandemic the Constabulary established a dedicated command model to focus on our response to the disease. This command structure was set up in collaboration with Suffolk Constabulary and enabled a consistent approach to our activity both in each force and across the extensive range of collaborated services.
- 5.8 This structure initially operated a Gold-Silver-Bronze model with Gold Command operating across both forces, and a Silver Commander nominated in each force. However, at the tail end of 2021, the silver role was amalgamated, and one Silver Commander was appointed for the two forces. A Strategic Gold plan was written which was implemented by the Silver at an operational, tactical level. A review of the

command structure took place as the infection rates started to reduce and alignment with business-as-usual activity commenced. Whilst the existing dedicated command structure was officially and formally stood down from 10th June 2022, the retention of the Gold and Silver commanders will ensure oversight of the local and national position and will ensure a mechanism to facilitate the dissemination of information across both organisations from Op Talla (the national policing response) and other Government departments when and as required.

- 5.9 The Constabulary governance model has remained in place throughout the whole year, allowing the Chief Constable and his Chief Officers to continue to run the force and hold officers and staff to account through different meeting structures. This was done in conjunction with Suffolk Constabulary and the continued use of virtual meetings has allowed appropriate governance arrangements to be delivered as normal across the collaborated functions as well as in Norfolk only functions. In short, the Joint Chief Officer Team (JCOT), Joint Organisational Board, Joint Strategic Planning and Monitoring meetings all took place as planned. In addition, Norfolk Command Team met regularly with all meetings mentioned being held virtually via video enabled Microsoft Teams.
- 5.10 Moving into the new financial year there has been a move to some governance meetings returning to be on force premises, and a mixed approach for others with some attendance in physical meeting rooms, with other attendees at other force premises, or working from home and attending virtually. This is likely to be a model that continues going forward as the force embeds its new Modern Workplace Programme with one of the key principles being "Our work takes place at the most effective locations and at the most effective times".
- 5.11 As a result of the Covid-19 pandemic the OPCCN established a strategic model to focus on our response to the disease and the opportunity to work in a different way moving forward; whilst ensuring that the Police and Crime Commissioner (PCC) continued to maintain effective governance to fulfil the statutory role and support the wider sector through commissioning of services.
- 5.12 The strategy confirmed how the core functions of the Office of the Police and Crime Commissioner (OPCC) can be maintained and, in some cases, developed, to continue to perform effectively in a changing environment. The extension of agile working ensured people were equipped with appropriate technology to enable them to work from home and this continues to a lesser extent currently. Owing to the changes which have taken place across the county other changes have resulted for the OPCCN. Many meetings with agencies that work with victims are now conducted in other ways, such as via phone or via Teams and this has been more efficient and effective in terms of costs and time. However, some face to face meetings are being put into diaries following the removal of restrictions and suitable risk assessments.
- 5.13 Hybrid working is now considered to normal practice within the organisation and plans are being drawn up to redesign office spaces to reflect the change. Virtual governance

practices have been developed so that the PCC is still able to hold the Chief Constable to account and these practices have continued during the period of the accounts.

- 5.14 In addition, during this year, the OPCCN has worked with statutory and non-statutory (third sector/charity) organisations to address the additional needs required for victims of crime and those organisations who are supporting them. The OPCCN has proactively sought, bid for and were successful with a variety of national funds to bring financial support to the county and these are set out in the table below:

Fund	District	FY2021/22
Home Office - Safer Street Fund 3	All	£383,099
Home Office - New IDVA funding	Breckland, Kings Lynn, North Norfolk, 1xVA all	£173,258
Home Office - Sexual Violence Fund	All	£97,353
Home Office - Provision of SV/DA Uplift	SV - All, DA-Broadland, Gt Yarmouth, Norwich, South Norfolk	£171,412
National Probation Service	Norwich	£17,500
Public Heath (Pathway Out)	All	£30,000
DWP (Pathway Out)	All	£35,000
Public Heath (Wonder +)	All	£67,250
TOTAL		£974,873

Crime Recording

- 5.15 As outlined in the main body of the report HMICFRS re-inspected the force in 2022 and removed the areas for improvement and recommendations as a result of the CDI compliance evidenced. Internal Crime Data Integrity audits show recent compliance rates of 96% which if graded would be expected to be either Good or Outstanding.

6. Conclusion and Assurance Summary

- 6.1 This report has highlighted the issues which have been identified during the year and which are being addressed.
- 6.2 The Corporate Governance Working Group has concluded that the governance arrangements are fit for purpose in accordance with the governance framework.
- 6.3 Finally, we are satisfied that this report is an accurate commentary on the governance arrangements in place in the Constabulary and the OPCC and of their effectiveness during this period.

Signed



Police and Crime Commissioner for Norfolk



Chief Constable of Norfolk



Mark Stokes
Chief Executive
Office of the Police and Crime Commissioner



Jill Penn CPFA
Chief Finance Officer
Office of the Police and Crime Commissioner



Peter Jasper
Assistant Chief Officer
Constabulary Chief Finance Officer

Date: 16/04/2024

Signed on behalf of the senior staff of the Police and Crime Commissioner for Norfolk and on behalf of the Chief Officers of Norfolk Constabulary.

