

**ANNUAL GOVERNANCE STATEMENT FOR  
THE POLICE AND CRIME COMMISSIONER FOR NORFOLK AND  
THE CHIEF CONSTABLE OF NORFOLK 2023/24**

**1. Background**

- 1.1 This Annual Governance Statement (AGS) covers the financial year 2023/24 but extends to cover the period to the signing of the Statements of Accounts in xxxx. 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](http://www.norfolk-pcc.gov.uk)) or may be obtained from the Office of the Police and Crime Commissioner for Norfolk, Building 7, Falconers Chase, Wymondham, Norfolk, NR18 oWW.
- 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 2023/2024 (ending 31 March 2024) and [up to the date of the approval of the Statements of Accounts].
- 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 Policing and Crime Act 2017, a number of 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 considered a range of options for additional resourcing to assist the part time Police Complaints Review Officer role to ensure the efficient and effective delivery of the service. The Complaints and Compliance Officer post has been reviewed and an additional responsibility has been added with regards to conducting and administering complaint review validity assessments. The role has now evolved into the Complaints and Compliance Manager and as part of this now provides support to the Police Complaints Review Officer. In addition, regular reporting on the number of complaint reviews is carried out through the Norfolk Police and Crime Panel Complaint's Sub-Panel. There are also now quarterly meetings between OPCCN, Norfolk and Suffolk Professional Standards Department and the Independent Office for Police Conduct (IOPC) to discuss performance and identify any emerging trends.
- 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 regularly shares information about policing activity to keep communities informed, aware and educated about local issues. This is achieved through content on social and digital media channels including X (formerly Twitter), Facebook, Instagram, Next Door, LinkedIn, the force website, and indirectly via news media, parish newsletters and parish and council meetings. Members of the public can also sign-up to receive messages directly via email through Police Connect.
- 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 and Engagement Plans, setting out how it will obtain the views of the community and victims of crime regarding policing for a rolling twelve-month period. The OPCCN has a Consultation and Engagement Officer to review, develop and deliver its engagement activities and oversee delivery of the Engagement Strategy. The Communications and Engagement Plan is reviewed and updated annually to take into the account the PCCs priorities as set out in the Police and Crime Plan, and new and emerging priorities; either strategic or tactical. Engagement is carried out through established fora such as the Independent Advisory Group and Youth Commission, strategic and operational partnerships and bespoke activity and events at a national, regional and local level.
- 3.12 The PCC held a countywide budget consultation asking Norfolk people whether they agreed to a precept rise for 2024/25. Key partners were also consulted. The results of the police budget 2024/25 consultation show that 56% 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 (Police 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). The IAG engages with a range of stakeholders for different purposes, ranging from developing strategy, assessing the efficiency and effectiveness of the police force and commissioning services, to promoting community safety indicatives and building confidence.
- 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 has undertaken public perception surveys 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. Due to saving requirements, this survey will no longer be carried out from March 2024 and the constabulary is currently reviewing alternative options to replace this service.
- 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 Giles Orpen-Smellie, the Police and Crime Commissioner for Norfolk took up his post following the elections in May 2021. He then set out a Police Crime and Community Safety Plan that covered the period 2022-2024. The financial accounts 2023/24 therefore reflect the priorities of the plan as shown below. Subsequently, at the May 2024 elections Sarah Taylor was elected Police and Crime Commissioner. Therefore, a new plan will be drawn up in due course.
- 3.18 The Plan of the former PCC set out six pillars for Norfolk and outlined the PCC's vision for tackling and preventing crime, protecting the most vulnerable and supporting victims.

The six pillars are: -

- Sustain Norfolk Constabulary
- Visible and Trusted Policing
- Tackling Crime
- Prevent offending
- Support victims
- Community Safety

3.19 The Plan has been monitored through two public forums:

- The Police Accountability Meetings (PAM) 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 PAM 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 2023/2024 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 maintain 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. 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.

3.21 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, where required, the Joint Chief Officer Teams of the two constabularies. New collaboration or significant changes to existing collaborated functions 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 Portfolio Management Office (PMO) oversee the planning, implementation and delivery of Norfolk and Suffolk Constabularies' overarching change programme in accordance with the two forces' strategic priorities and reports upwards via the Joint Strategic Planning and Monitoring Board meeting into the Joint Norfolk and Suffolk Chief Officer Team. Reporting information is produced, that includes an overarching milestone plan including project metrics, portfolio level highlight reports, programme RAID logs, benefits tracking and organisational capacity analysis.

**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 and is 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. An example of this is the consideration of the Strategic Assessment in the OPCC's Serious Violence Needs Assessment.
- 3.25 Norfolk Constabulary produce an annual 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. The FMS is now an evergreen product and refreshed throughout the financial year on a quarterly basis, with a full refresh taking place each May. The results of which are used to consider prioritisation of change projects and programmes along with the overall consistency of decision making for areas such as the annual Service and Financial Planning (OBB) process.

- 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 local as well as national strategic crime and thematic topics such as Serious and Organised Crime (SOC local profile) and the Police Race Action Plan (PRAP National profile), whilst also looking at organisational issues such as the 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. There is now a national requirement to update certain profiles on a routine basis, such as Violence against Women and Girls (VAWG).
- 3.27 The Strategic, Business and Operational Services (SBOS) department undertakes analysis, research, and evaluation activity across the Constabulary. SBOS undertake analysis covering strategic, operational, organisational and corporate performance, with the introduction of new management information reporting capabilities coming online in 2023/24. SBOS also leads on policy, corporate risk management, portfolio management and project prioritisation, benefits identification and the delivery of joint programme / project change (including business analysis). The 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. SBOS is also developing a small data science capability, which is likely to expand over time. Finally, SBOS also lead on compliance with the Home Office Counting 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.
- 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) in order 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 over the years, allowing the provision of its own dedicated if small analytical capability which has been utilised by the Constabulary. NODA has expanded during 2023/24 with active engagement from more local authorities and now Health. This has allowed NODA to agree a strategic plan that was confirmed at the end of 2023/24 and will focus capacity around various workstreams in the future, including the scoping of a shared linked data set.

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

- 3.30 Leading with Care (LWC) continues to be the leadership development framework used in Norfolk and Suffolk Constabularies. It is in the process of being updated in line with the launch of a new LMS platform. A Development for All section is available now for everyone to access. It has a variety of content for staff to 'pick and mix' CPD from and there is content suited to all levels of leadership. The new pathways are progressing well and are due for launch this summer. The pathways will be more inclusive for staff as well as officers and still used to assess promotion suitability.
- 3.31 The College of Policing has launched the National Police Leadership Centre, this will progress the national standardisation of leadership development, progression and promotion. The LWC framework is well placed to align to national changes including development prior to promotion, this is a requirement of the new Sergeant and Inspector Promotion process (SiPP). The STRIPES programme for Police Constables aspiring to the rank of Sergeant is in place to provide technical learning to support operational capability and leadership skills appropriate for first line management; a further course for aspiring Inspectors is now being developed under the operating name STARS and is due to be rolled out in 2024.
- 3.32 In line with the Constabulary's 'The Right Culture' programme in response to the Casey Review and Angiolini Inquiry, the one-day leadership training event has been running since January with twenty-six sessions completed in Norfolk and a further thirty-three sessions planned throughout 2024. The training has been adapted and updated to support the Constabulary's Culture Objectives and in response to feedback from participants and our Staff Support Networks. This also supports the College of Policing's Upstander Training Programme. Further training is being planned for wider delivery in 2025.
- 3.33 Leadership apprenticeships continue to be offered and completed for police staff to replicate the qualifications offered to officers via the Police Officer National Promotion Framework.
- 3.34 The Police Education Qualification Framework (PEQF) is in its third year and the programme includes leadership level 1 within the curriculum.

- 3.35 In 2024 evaluation will take place around 'Push Far', to better understand the impact it has had. Norfolk and Suffolk were one of six forces initially taking part in a National Coaching and Mentoring pilot, which is now planned for wider rollout across forces. The scheme provides a national coaching pool designed to support leadership and personal development and increases our diversity and pool of coaches and mentors available.
- 3.36 A new online system has been introduced to replace the existing Learning Management System (LMS). This new system has improved user interface, with the capability to monitor compliance data, provide signposting pathways and notification reminders and timely updates. The system has been positively received and continues to develop with increasing use and tracking capability. The LMS system will be used where possible to deliver training requirements and host force wide digital learning packages for personal and leadership development.
- 3.37 The force is now using an electronic PDR, this has enabled the tracking of completion rates across all of the commands. Further development work will take place to streamline the form and improve the usability. Data pulls from PDR will focus on progression and promotion, identifying high potential and linking into retention strategies. The People Board continues to monitor PDR and push for improved engagement and consistency across departments. PDRS are the central document used in promotion processes.
- 3.38 The People Directorate business case investment is entering its final phases and the development of Strategic Workforce Planning and succession planning is now being progressed. The work will support talent management and the development of plans to support future capability demands.
- 3.39 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 41 live Staff Apprenticeships across 16 different Apprenticeship Disciplines 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. In addition, we have 239 officers across both forces currently live on the Police Constable Degree Apprenticeship.
- 3.40 To compliment the online onboarding programme, the force has re-introduced face to face induction days. These events provide the opportunity for new joiners to be fully briefed on the learning & Development opportunities available, career/leadership pathways and working in the force.

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

- 3.41 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. 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. The policy is subject to regular review and was last updated at the end of 2023. A similar policy has been drawn up by the Norfolk Office of the PCC (OPCC). The Audit Committee routinely sees the Strategic Risk Registers.
- 3.42 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.
- 3.43 In last year's report we provided an update on our Crime Data Integrity (Home Office crime recording rules) compliance which forms part of the inspection programme of His Majesty's Inspectorate of Constabularies, Fire and Rescue Services (HMICFRS). Our last full Crime Data Integrity (CDI) inspection was in 2019 when we received a 'Requires Improvement' grading, with six associated Areas for Improvement (AFIs) and three Recommendations. This led to the Crime Data Integrity Quality Assurance Team being formed. Their work, together with a series of other actions taken by the constabulary, saw the removal of these AFIs and recommendations when we were reinspected by HMICFRS as part of our 2021/22 PEEL (Police Effectiveness, Efficiency, and Legitimacy) assessment.
- 3.44 Our latest and ongoing PEEL inspection has included a full Crime Data Integrity audit, which HMICFRS conducted in February 2024. In advance of our PEEL inspection report being published later this year, HMICFRS have reported that the headline findings from our CDI audit were:
- We are recording 97.96 percent (with a confidence interval of +/- 1.56 percent) of all reported crime (excluding fraud) in accordance with Home Office Counting Rules.
  - We are recording 99.03 percent (with a confidence interval of +/- 1.59 percent) of sexual offences in accordance with Home Office Counting Rules.
  - We are recording 96.08 percent (with a confidence interval of +/- 3.73 percent) of violent offences in accordance with Home Office Counting Rules.

Based on these results, we can expect to receive a 'Good' or 'Outstanding' CDI grading when our final report is published.

- 3.45 Even with the additional flexibility available to the PCC for precept increase in 2023/24; over the medium term, efficiencies will continue to be identified so that operational demand and cost pressures can be met. By the 31 March 2024 some c£45m of annually recurring savings will have been found. Over the MTFP period to 2027/28 a further c£3m has been identified. Reserves are forecast to reduce from £16.5m at 31 March 2023 to £13.6m by 31 March 2027 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**

- 3.46 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 meeting. The Annual Report and financial performance papers are published on the OPCC website.
- 3.47 Following on from previous years whereby the OPCCN has received the Transparency Quality Mark for meeting its statutory requirements for openness and transparency the office undertook to develop a new process using members of the community who sit on the Norfolk Independent Advisory Group (IAG) to help assess our compliance and ensure continued independent scrutiny. Membership of the IAG includes independent residents of Norfolk which makes them ideal candidates for carrying out an independent assessment of the OPCCN.

The Specified Information Order (SIO) is a statutory requirement for Elected Local Policing Bodies which sets out what information should be maintained and published on our website.

In 2022/23 the OPCCN commissioned members of the IAG to undertake an internal audit to ensure continued compliance of the OPCCN with the SIO in the absence of the Transparency Quality Mark process. The results of this audit are published on the OPCCN website and can be accessed by click on this [link](#). A further audit was undertaken in 2023/24 and again the report has been published on the website.

- 3.48 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 is 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. New members, the Head of PSD and the Data Protection Officer have been co-opted onto the group for 2024/2025. These officers are involved in the oversight of the governance framework and its processes and can review its effectiveness.

#### **Internal Audit**

- 4.5 Internal audit delivered under contract by TIAA since 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. 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 original contract with TIAA ended on 30 June 2021. A tender exercise was undertaken. However, this did not result in a successful award. Arrangements with TIAA were therefore extended until 30 June 2022. A fresh procurement exercise was then undertaken with TIAA reappointed as the PCC and Chief Constable's internal auditors. The contract period was from 1 July 2022 for two years with the option of a 2 x 1 year extension.
- 4.7 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.
- 4.8 At the time of writing the 2023/24 draft Head of Internal Audit opinion has been issued and is as follows: TIAA is satisfied that, for the areas reviewed during the year, Office

of the Police and Crime Commissioner for Norfolk and Chief Constable of Norfolk Constabulary has reasonable and effective risk management, control and governance processes 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 your ability to meet financial obligations which must be obtained by the Office of the Police and Crime Commissioner for Norfolk and Chief Constable of Norfolk Constabulary from its various sources of assurance.

### External Audit and Other External Review Bodies

- 4.9 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.
- 4.10 There was a new PSAA procurement process undertaken to appoint auditors for the next 5 year appointing period and notification was received in autumn 2022 as to who the external auditor will be for the PCC and Chief Constable. Ernst and Young LLP were reappointed under the procurement.
- 4.11 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.
- 4.12 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](#)
- 4.13 The Constabulary received the following graded judgements:

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		

- 4.14 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 are re-inspecting these AFIs as part of our 2023 – 2025 assessment process which is currently ongoing.
- 4.15 The current framework against which HMICFRS inspect forces under the PEEL programme can be viewed [here](#). The framework assesses the following core questions:
- Q1 - How good is the force's service for victims of crime? (ungraded).
- Q2 - How good is the force at treating the public fairly, appropriately, and respectfully?
- Q3 – How good is the force at preventing and deterring crime, antisocial behaviour, and vulnerability?
- Q4 – How good is the force at responding to the public?
- Q5 – How good is the force at investigating crime?
- Q6 – How good is the force at protecting vulnerable people?
- Q7 – How good is the force at managing offenders and suspects?
- Q8 – How good is the force at disrupting serious and organised crime?
- Q9 – How good is the force at building, developing, and looking after its workforce and encouraging an ethical, lawful, and inclusive workplace?
- Q10 – How good is the force at planning and managing its organisation efficiently, making sure it achieves value for money both now and in the future?
- Q11 – Counter-corruption units and vetting.
- 4.16 The evidence collection process for the PEEL inspection programme includes a document request which helps HMICFRS to develop their knowledge about a force ahead of the designated inspection period. Our document request was returned by the deadline of 24<sup>th</sup> November 2023.
- 4.17 Other PEEL inspection activity which has taken place during this reporting period includes meeting observations, staff and officer focus groups, Stop & Search Body Worn Video review, a specialist inspection of the Safeguarding Children Online Team (SCOLT) and Public Protection Unit (PPU), a two-day inspection of the Contact and Control Room, and our Victim Service Assessment (VSA), which included the Crime Data Integrity audit. A workforce survey was also shared across the organisation in February 2024. Throughout March 2024 a series of interviews were held with strategic leads, and the Strategic Briefing was delivered by the Chief Officer team to

His Majesty's Inspector of Constabulary, Roy Wilsher, on 25<sup>th</sup> March 2024. Other inspection activity in March included an audit of the written ground recorded on a sample of Stop & Search forms which were randomly selected by HMICFRS.

- 4.18 We can expect our final PEEL report to be published in September 2024.
- 4.19 At the time of writing, fourteen other forces have received their PEEL gradings. The common theme seen is grade deflation across all question areas of the assessment framework, and in particular Responding to the Public (Question 4), Investigating Crime (Question 5), Protecting Vulnerable People (Question 6), Managing Offenders and Suspects (Question 7) and Developing a Positive Workplace (Question 9).
- 4.20 The Constabulary also continues to progress AFIs and Recommendations allocated by HMICFRS to all forces and Chief Constables across England and Wales which result from their national thematic inspections.
- An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children.
  - Values and Culture in the Fire and Rescue Service (which included one recommendation for policing).
  - PEEL spotlight report - Police performance: Getting a grip.
  - State of Policing - The Annual Assessment of Policing in England and Wales 2022.
  - An inspection of how effective police forces are in the deployment of firearms.
  - An inspection of the police contribution to the prevention of homicide.
  - An inspection of race disparity in police criminal justice decision-making.
  - A review of the police service's leadership and governance arrangements for race-related matters.
  - An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation. Norfolk Constabulary was one of six police forces that were inspected for this report.
  - Meeting the needs of victims in the criminal justice system - An inspection of how well the police, the Crown Prosecution Service, and the Probation Service support victims of crime.
  - Joint case building by the Police and Crown Prosecution Service – interim report.



- 4.21 The Constabulary has accepted all the national thematic report recommendations and AFIs that have been published in this reporting period and we have assessed our position against each. Where necessary a plan has been developed to achieve the standards outlined within the timescales set by HMICFRS.
- 4.22 Where required under Section 55 of the Police Act (1996), the Chief Constable has provided the Police and Crime Commissioner with a response for each recommendation made by the inspectorate. These responses have been published on the Office of the Police and Crime Commissioner for Norfolk's website.
- 4.23 On 15<sup>th</sup> December 2023, HMICFRS, the College of Policing, and the Independent Office for Police Conduct (IOPC) published a report in response to a super-complaint submitted by the Criminal Justice Alliance (CJA) about the police's use of Section 60 of the Criminal Justice and Public Order Act 1994, and the scrutiny of all Stop and Search powers. One of the recommendations that resulted from this report required the Constabulary to publish on our public website how we have responded, or will respond, to the seven other recommendations that were directed to all police forces and Chief Constables across England and Wales. Our response can be viewed [here](#).
- 4.24 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 12 referrals (5 Suffolk, 7 Norfolk) in financial year 2023/24. None of these have resulted in formal action from the ICO, however 2 referrals (1 Suffolk, 1 Norfolk) currently remain ongoing. Any recommendations from the ICO have been actioned, as necessary. 3 referrals (2 Suffolk, 1 Norfolk) remain ongoing from 2022/23, these relate to data breaches following the dissemination of Freedom of Information (FOI) responses.
- 4.25 The Chief Executive of the OPCCN is the Data Controller for that organisation and manages data breaches of which there have been one for the OPCCN during 2023-24.

### **Police and Crime Panel**

- 4.26 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 after District Council elections in May 2023 consists of 3 county councillors, 7 district councillors and 2 independent co-opted members.

### **Audit Committee**

- 4.27 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.

4.28 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.

4.29 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 A significant number of mitigating steps have been taken to prevent similar data breaches from re-occurring. These steps have been shared with external audit.

5.3 As the audit of the 2021/22 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 outlined that the PCC and Constabularies recognised the issue but were not yet able to assess a liability to include in the accounts. For the 2022/23 accounts it was concluded that a contingent liability should be included to recognise the fact that claims will be received connected to the data breach, but their timing and quantum were not known.

5.4 In respect of the 2023/24 accounts recognition has been made in the accounts for the low number of claims received in respect of the data breach either as settled claims or estimated.

## **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.

DRAFT

## 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:

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.