

**ANNUAL GOVERNANCE STATEMENT FOR  
THE POLICE AND CRIME COMMISSIONER FOR NORFOLK AND  
THE CHIEF CONSTABLE OF NORFOLK 2024/25**

**1. Background**

- 1.1 This Annual Governance Statement (AGS) covers the financial year 2024/25 but extends to cover the period to the signing of the Statements of Accounts on 26/2/26. 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 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 themselves 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 2024/2025 (ending 31 March 2025) and up to the 26/2/26.
- 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 College of Policing have recently published the 2024 National Police Code of Ethics (COE). The Code provides the framework ethical behaviours that promote and reinforce the high standards of professional behaviour expected by all members of the policing profession in England and Wales both on and off duty. The Code applies to all those who work for the Constabulary, be they warranted police officers, police staff, volunteers or someone contracted to work in a police environment. The Code has been adopted by Norfolk Constabulary and all Officers and Staff have been made aware of the three ethical Policing Principles: namely “Courage”, “Respect and Empathy” and “Public Service”. This is reinforced with the Constabulary’s “Core of Policing” and “Right Culture” programmes. Organisational policies, procedures and training products are reviewed in line with the Police Code of Ethics 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 placed upon all officers and staff to report these matters. Norfolk Constabulary has a Professional Standards Department (PSD), and it is this department who receives and investigates such reports. The PSD incorporates the organisation’s Anti-Corruption and Vetting teams alongside a Serious Case Investigations team, together they are responsible for managing the application of the police misconduct regulations and compliance with national vetting standards.

A Code of Conduct based on the Code has also been adopted by the PCC and staff of the OPCC.

- 3.6 During 2024/25 the OPCCN has continued to monitor the demand and complexity of police complaint reviews and has retained the role of a dedicated part time Police Complaints Review Officer which is supported by the Complaints and Compliance Manager role. Regular performance reporting is undertaken on the timeliness of conducting complaint reviews with comparisons monitored with most similar force areas and the Independent Office for Police Conduct (IOPC). These performance reports are presented to the Norfolk Police and Crime Panel on behalf of the Police and Crime Commissioner (PCC). The quarterly meetings that were introduced with the IOPC during 2023/24 continue to provide additional oversight and scrutiny for the PCC.
- 3.7 Norfolk Constabulary has formal policies in place to ensure its employees are not Influenced by prejudice, bias or conflicts of interest. These include public complaints, anti-fraud and corruption, declaration of business interests, gifts, loans and hospitality, confidential reporting, whistle blowing and notification of disclosable associations. The constabulary intranet site is proactively used on a regular basis to remind Officers and staff of their various responsibilities relating to ethical behaviour. The confidential reporting policy is also available on the intranet site and aims to ensure that officers and staff are aware of their obligations, whilst being supported and empowered to

report actual or suspected wrongdoing. The policy explains the process for how to do this.

### **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 2025/26. Key partners were also consulted. The results of the police budget 2025/26 consultation show that 80% 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 ceased a contract in March 2024 that supplied survey results giving a measure of satisfaction of the constabulary's service users. The Crime Survey of England and Wales has therefore been the method by which the Constabulary assesses key metrics regarding confidence, satisfaction and engagement. This will be further developed by the government who will track progress of the additional resources provided for neighbourhood policing in the Neighbourhood Policing Guarantee. The drawback of the Crime survey of England and Wales is the regularity and the granularity of the results. As such, the Police and Crime Commissioner has funded a temporary post to expand the survey provision of the communities of Norfolk.
- 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 2024/25 therefore reflect the priorities of this plan. Subsequently, at the May 2024 elections Sarah Taylor was elected Police and Crime Commissioner. A new Police and Crime Plan was approved in January 2025

- 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

The current PCC's plan has three priorities:

- Preventing Crime
- Cohesive Communities
- Reducing Harm

- 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 \(norfolk-pcc.gov.uk\)](#)

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 2024/2025 proposed by the PCC was based on an increase in the council tax (following consultation) of £12.96 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. Of note, this year we have adopted a new methodology, Organisational Risk Indicator (ORI) scoring, that assesses how effectively the forces can respond to risk. This method assists in assessing and preventing some of the reoccurring themes of crime within Norfolk and Suffolk and aids understanding of the cross-cutting factors across the thematic threats. 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.

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 at set times throughout the financial year, 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 Child Sexual Assault or Exploitation (CSAE), whilst also looking at organisational issues such as the Racial Disparity in Criminal Justice decisions 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 Homicide or 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 through a visualisation tool called Power BI starting from 23/24. 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 has been developing a small data science and engineering capability, which is likely to expand during 25/26. 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 Tactical 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. Ever evolving, SBOS introduced a new Strategic Tasking and Co-ordination meeting during 24/25 to assist with strategic profile prioritisation. 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. NODA's agreed Vision, Mission and Purpose focusses on four core areas of 'people', 'infrastructure', 'partnerships' and 'insight'.

### **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 evolve as the core leadership development framework used in Norfolk and Suffolk Constabularies. Foundation and Established pathways were launched this year and significant work has been undertaken to maximise the potential of the new LMS platform, refreshing and building on accessible content suited to all levels of leadership. In addition to online content, Leading with CARE workshops were developed in line with People Opinion Survey feedback to offer development through a blended approach of face to face and online workshops which included topics such as courageous conversations, managing performance, resilience & wellbeing and decision making.

3.31 Work is ongoing to map the Leading with CARE framework against the national standards set out by the National Police Leadership Centre. The new Sergeant and Inspector Promotion process (SiPP) is still in development by the College of Policing, and we are monitoring progress with this to ensure alignment to any changes that follow. The STRIPES programme for Police Constables aspiring to the rank of Sergeant continues to provide technical learning to support operational capability and leadership skills appropriate for first line management.

3.32 In line with the Constabulary's 'The Right Culture' programme which was implemented in response to the Casey Review and Angiolini Inquiry, our one-day leadership training (Right Education) has been running since January 2024 and concludes in July 2025. The training supports the College of Policing's Code of Ethics and is aligned to the Constabulary's Vision and Mission and our culture objectives

3.33 Leadership apprenticeship numbers have increased as a consequence of increased funding sourced through the levy transfer process, enabling us to support and develop our staff.

3.35 In addition to 'Push Far', a scheme which provides a national coaching pool designed to support leadership and personal development, the Norfolk and Suffolk internal Coaching network re-launched this year, offering Professional Development coaches to support development across both forces.

3.36 The Learning Management System (LMS) which launched in '24, has an improved user interface, and enabled monitoring of compliance data, with all mandated training added to the system. The LMS system has been used to deliver a wide range of training requirements and host force wide digital learning packages for personal and leadership development, including improved Leading with CARE content training and packages for effective PDR conversations.

3.37 To support engagement with the PDR's, a suite of resources has been created and hosted in the LMS, in addition to this virtual 'how to' sessions, exploring different aspects of the PDR process have been run. The electronic PDR system has also been improved with hover prompts against each item to assist users and a new prompt to ensure completion. Completion rates are monitored and reviewed through People Board and PDRs are still the central document used in promotion processes.

3.38 Following the creation of our combined People Analytics and Workforce Planning function work is in progress to enhance our Workforce Planning activity and succession planning is now being progressed. The work will support talent management and the development of plans to support future capability demands.

3.40 The introduction of the face-to-face induction days, to compliment the online onboarding programme, has been well received. Given the importance of these events, the decision was taken to mandate attendance. New joiners are briefed on the values and purpose of the organisation, core working practices and the opportunities to develop and progress. The online content continues to evolve and ensures a valuable, blended approach to onboarding and induction.

## **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 was subject to a full update in 2023, with continuous improvements made leading to the latest version published in 2025. A similar policy has been drawn up by the Norfolk Office of the PCC (OPCC). The Audit Committee routinely sees the Strategic Risk Registers, the format of which evolved during 24/25 to take account of national best practise.

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 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 (CDI) 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 HMICFRS conducted a Crime Data Integrity (CDI) audit of Norfolk Constabulary's crime recording standards in February 2024 as part of the Constabulary's most recent PEEL inspection. They published their findings in September 2024 and Norfolk received the highest grading of 'Outstanding'.

3.44 HMICFRS estimated that the Constabulary recorded 98 percent (with a confidence interval of +/- 1.6 percent) of all reported crime (excluding fraud) in accordance with Home Office Counting Rules, awarding the Constabulary the highest grading that a police force can achieve. Norfolk Constabulary is one of only five forces to be awarded this grading as part of the current PEEL inspection process (note: inspection reports are still to be published for six police forces).

#### **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.

3.48 The Audit Committee has overseen the 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 For 2024/25 the Head of Internal Audit's Annual Opinion was as below:

"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 will be 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 the performance of police forces across England and Wales under the Police Effectiveness, Efficiency, and Legitimacy (PEEL) inspection programme.

4.12 Following a period of inspection, HMICFRS published their PEEL Assessment 2023 - 2025 inspection of Norfolk Constabulary report on 24th September 2024. The Constabulary received the following graded judgements, with 17 associated identified 'Areas for Improvement' (AFIs):

4.13 [The Constabulary received the following graded judgements:](#)

Outstanding	Good	Adequate	Requires improvement	Inadequate
Recording data about crime	Preventing crime	Police powers and public treatment	Responding to the public	
		Investigating crime	Protecting vulnerable people	
		Developing a positive workplace	Managing offenders	
		Leadership and force management		

4.14 The Chief Constable’s and Police & Crime Commissioner’s response to the report was published on the Office of the Police & Crime Commissioner for Norfolk’s (OPCCN) website in November 2024. The report and the associated AFIs were discussed in detail with the Police and Crime Commissioner at the Strategic Governance Board meeting on 2nd October 2024

4.15 The Constabulary has developed an action plan to address the AFIs that HMICFRS identified. This is overseen by the Deputy Chief Constables who meets with Heads of Department on a bi-monthly basis to review progress and prepare for the next round of PEEL inspections, for which the framework has been published – [PEEL assessment framework 2025-2027](#)

4.16 In January 2024 the Police and Crime Commissioner asked HMICFRS to carry out an inspection of the Constabulary’s handling of 999 calls for certain incident types involving vulnerable people. HMICFRS published their letter of findings on 24th May 2024.

4.17 HMICFRS also undertake regular thematic inspections which focus on a particular area of policing. These reports result in recommendations being set which all police forces across England and Wales are expected to implement. Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond to and publish comments on all inspection reports within 56 days of report publication. In accordance with this requirement, the Chief Constable provided the Police and Crime Commissioner with his response to every thematic report that was published in 2024/25. These responses can be found on the OPCCN website. The Constabulary accepted all the recommendations and AFIs that were included in these national thematic reports, assessing its position against each and where necessary developing plans to achieve the standards required.

4.18 In May 2024 the Constabulary was one of seven forces inspected by HMICFRS as part of their thematic inspection on how effectively the police investigate crime. The findings report was published on 27th March 2025.

4.19 In conjunction with Ofsted, the Care Quality Commission, and His Majesty’s Inspectorate of Prisons, HMICFRS also undertake Joint Targeted Area Inspections to assess how local authorities, the police, health, and Probation are working together in an area to identify, support, and protect vulnerable children and young people. In November 2024 the inspectorates announced that they were undertaking a Joint Targeted Area Inspection of the multi-agency response to children who are victims of domestic abuse in Norfolk. The inspection took place in December 2024. The joint

inspectorate published their letter of findings on 27th February 2025, praising Norfolk's strong partnership arrangements and concluding that Domestic Abuse is seen as a 'priority for everyone' in Norfolk. The inspectorate reported many strengths but also identified some areas where improvement is needed across the local partnership. Activity in response to the findings has already commenced and a multi-agency action plan is being developed.

- 4.2 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 3 referrals (2 Suffolk, 1 Norfolk) in financial year 2024/25. 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.
- 4.21 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 2024-25.

### **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 after District Council elections in May 2024 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.

4.29 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. In addition, an independent report into the breach was undertaken that resulted in a number of recommendations. The constabulary has implemented these recommendations and the Internal Auditors, TIAA, have conducted a full audit of the implementation and given a Substantial Assurance rating in their audit report. All the relevant information has been shared with external audit.

5.3 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 2024/25 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.

**Signed**



Sarah Taylor  
Police and Crime Commissioner for Norfolk



Paul Sanford  
Chief Constable of Norfolk



Mark Stokes  
Chief Executive  
Office of the Police and Crime Commissioner



Simon George  
Chief Finance Officer  
Office of the Police and Crime Commissioner



Peter Jasper  
Assistant Chief Officer  
Constabulary Chief Finance Officer

Date: 26 February 2026

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.