

**ANNUAL GOVERNANCE STATEMENT FOR
THE POLICE AND CRIME COMMISSIONER FOR NORFOLK AND
THE CHIEF CONSTABLE OF NORFOLK 2017/18**

1. Background

- 1.1 This Annual Governance Statement (AGS) covers the financial year 2017/18 [but extends to cover the period to the signing of the Statements of Accounts in August 2018]. This statement is an opportunity to demonstrate compliance with the Code of Corporate Governance.
- 1.2 The Police and Crime Commissioner (PCC) and the Chief Constable for Norfolk are responsible for ensuring that their business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.
- 1.3 In discharging this overall responsibility, the PCC and Chief Constable are also responsible for putting in place proper arrangements for the governance of their affairs and facilitating the exercise of their functions, which includes ensuring a sound system of governance (incorporating the system of internal control) is maintained through the year and that arrangements are in place for the management of risk.
- 1.4 The Corporate Governance Framework which sets out how governance ‘works’ for the PCC and Chief Constable can be found on the PCC’s website (www.norfolk-pcc.gov.uk) or may be obtained from the Office of the Police and Crime Commissioner for Norfolk, Building 8, Jubilee House, Falconers Chase, Wymondham, Norfolk, NR18 0WW.
- 1.5 This Framework includes the joint Code of Corporate Governance (the Code) which is consistent with the principles of the CIPFA/SOLACE Framework: Delivering Good Governance in Local Government [April 2016] (as expanded by a Guidance Note for Police [June 2016]).
- 1.6 The PCC’s and Chief Constable’s financial management arrangements conform to the governance requirements of the CIPFA Statement on the Role of Chief Financial Officers in Policing (draft update May 2017). However, please see further commentary at 3.7 below.
- 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 The governance framework has been in place throughout the financial year 2017/18 (ending 31 March 2018) 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, employees, contractors or volunteers. Staffs 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 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. (Inserted by Gemma)
- 3.7 Since 1st April 2014 the Norfolk PCC's Chief Financial Officer (CFO) has acted in a dual capacity (as Section 151 officer) for both the Norfolk PCC and the Chief Constable. The CIPFA Code says that some PCCs and Chief Constables have agreed locally to combine the two CFO posts and designate a single officer. It also says that whilst this arrangement may be regarded as a pragmatic and cost saving solution, it is essential that the potential risks are recognised and that the governance framework is structured in a way that accommodates and responds to any compromises which might arise. The guidance confirms that combined CFO arrangements do not contravene the provisions of the Police Reform and Social Responsibility 2011 Act. The local arrangements have been considered by the Audit Committee and appropriate safeguards put into place.

Principle B - Ensuring openness and comprehensive stakeholder engagement

- 3.8 The PCC's website contains details of the meetings the PCC holds with the public, partners, Chief Constable, Audit Committee and Police and Crime Panel. Agendas, reports and minutes are available for public scrutiny where appropriate and social and digital media are frequently used to inform people unable to attend and to summarise meetings and key decisions.
- 3.9 The Constabulary offers regular, direct updates via its social and digital channels including Twitter, Facebook, the force website, and indirectly via the local media. In addition, members of the public can sign up to the free Police Connect service to receive details of local crimes, initiatives and engagement opportunities via e-mail, voicemail or text.
- 3.10 The Constabulary Community Engagement Strategy sets out how the Constabulary 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 the public, using 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. Seven Community Engagement Officers have been appointed to each

of the policing districts within the county and are using social media in a number of different ways to communicate effectively with the public.

- 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 Strategy setting out how it will obtain the views of the community and victims of crime regarding policing. This was updated for 2016-2020. The OPCC has recently appointed a Consultation and Engagement Officer to review, develop and deliver its engagement activities and oversee delivery of its overarching Strategy.
- 3.12 The PCC held a countywide budget consultation asking Norfolk people whether they agreed to a 2% precept rise for 2017/18. More than 2,200 people responded with 76% in favour of a rise. Key partners were also consulted. The PCC holds regular public meetings (Police Accountability Forum) to hold the Chief Constable to account.
- 3.13 The PCC has established a Victims' Panel which is enabling him to consult directly with victims on a wide range of subjects and issues. The OPCC manages a key independent advisory panel, the Independent Advisory Group (IAG).
- 3.14 The Constabulary measures the satisfaction of service users through the use of victim surveys and reports to the Office of the PCC on levels of satisfaction as one of the agreed Police and Crime Objectives.
- 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 along with the Chief Constables to consider issues impacting on the organisations and to discharge the governance responsibilities between Norfolk and Suffolk. 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 Collaboration Programme has been established (this is essentially the three strategic collaborations of Norfolk/Suffolk, Kent/Essex and Bedfordshire/Cambridgeshire/Hertfordshire) with a mission to develop options for wider collaboration in order to make efficiencies and drive out further savings. The programme 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 Following his arrival in May 2016, the PCC has consulted widely on his Police and Crime Plan (2016/20) and this was published in March 2017. The Plan sets out seven core priorities for Norfolk and outlines the PCC's vision for tackling and preventing crime, protecting the most vulnerable and supporting victims.

The seven priorities are:-

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

3.18 The Plan is monitored through two public forums:

- The Police Accountability Forum 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 where the PCC is held to account by the Panel for delivery against the Police and Crime Plan.

All of these performance reports are published on the OPCCN website <https://www.norfolk-pcc.gov.uk/police-accountability-forum/> 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>

- 3.19 There is a co-ordinated process for strategic and medium-term financial planning (MTFP) that uses Outcome Based Budgeting principles (OBB).. The budget for 2017/18 was set by the PCC based on a 'cash level' government funding settlement. The ability to maintain direct funding at 'cash level' was dependant on the precept being increased by 2% and as a result, the PCC recommended this increase and this was supported by the Police and Crime Panel. With funding the same in cash terms (as in 2016/17), budget reductions were required to finance pay awards, price inflation and service pressures over the medium term. 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 in order to ensure that the MTFP can finance the strategic aims of the Constabulary and the PCC.
- 3.20 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 and to the Commissioner on performance against objectives. This includes detailed analysis and scrutiny of performance and compares performance against the most similar family of forces.
- 3.21 Proposals for collaboration go through a detailed process, designed to ensure that all options are considered and that all parties can sign up to formal agreements in the knowledge that future policy, performance and resource levels are recognised at the offset. Dedicated resources are in place to support those units subject to Norfolk / Suffolk collaboration, including the formulation of detailed business cases. The business cases are subject to review by senior officers and the Joint Chief Officer Teams of the two constabularies. Proposals are further discussed before final sign off by the two PCCs. This is underpinned by formal agreements covering the legal aspects of collaboration. A similar process applies to regional proposals.
- 3.22 A Programme Management Office oversee the planning, implementation and delivery of Norfolk and Suffolk Constabularies' overarching change programme in accordance with the two force's strategic priorities and reports upwards via the Joint Strategic

Planning and Monitoring Board meeting into a Joint Norfolk and Suffolk Chief Officer Team.

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

- 3.23 Norfolk and Suffolk Constabularies gather data and intelligence from a range of sources to produce an annual Strategic Assessment. The Strategic Assessment takes into account 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. The 2017 Strategic Assessment expanded on that completed in 2016 and looked at the operational threats Norfolk and Suffolk constabularies face in the context of capacity and capability. One key difference was that the 2017 document included an organisational threat assessment – using outcome based budgeting, this section looks at how the constabularies could review internal processes and structures, such as overtime and sickness management, to make financial savings and improve efficiencies. All operational issues are risk assessed using the nationally recognised Management of Risk in Law Enforcement (MoRiLE) framework. The Strategic Assessment is then used to inform the development and review of the Police and Crime Plans and the local policing plans and performance frameworks. It also leads to the setting of the Operational Control Strategy for which there are identified strategic leads for each theme area. 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.
- 3.24 The Constabulary also undertakes strategic analysis in the form of Strategic Profiles. Where relevant, these are produced jointly for Norfolk and Suffolk, highlighting any cross force and single force issues. The profiles cover a range of strategic crime and thematic topics, including some looking at organisational issues such as sickness and absence management and overtime. 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 to ensure they are widely informed. These strategic profiles are used to inform the overall Strategic Assessment.
- 3.25 The Joint Performance and Analysis Department (JPAD) undertakes analysis, research, consultation and improvement and evaluation activity across the Constabulary. 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 the best available evidence regarding ‘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.
- 3.26 The 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. 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 provision of data for a large proportion of Freedom of Information Requests.

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

- 3.27 Norfolk and Suffolk Constabularies have a Leadership Development Programme called Best I Can Be and run a quarterly series of professional development events as part of the work being delivered under the Leadership Strategy. The Constabularies are also rolling out a Succession Planning and Talent Identification process which utilises career conversations and a nine-box grid matrix to identify and develop potential as part of its overall leadership and workforce planning strategies.
- 3.28 The Leadership Strategy promotes the idea that Leadership is not necessarily about rank. It advocates 'Courageous, Inclusive and Ethical' leadership. It goes further to describe the development of the whole workforce which is engaged not only in day to day activity but also in strategic projects and change programmes.
- 3.29 The Professional Development Review (PDR) process continues to be improved and embedded and work continues to develop an ePDR system.

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

- 3.30 The PCC and Chief Constable have Risk Policies in place to ensure that the risks facing the organisation are effectively and appropriately identified, evaluated and reported. The Joint Norfolk and Suffolk (Constabularies) Risk Management Policy includes details of the risk management framework within the governance structure of Norfolk Constabulary.). It sets out risk management requirements and practices that should be undertaken; by whom and when, and outlines the consequences of non-adherence. The policy supports a robust risk management approach for ensuring that strategic objectives are achieved and shows how risk is dealt with, by mitigation and/or escalation to the appropriate level in the organisations. A similar policy has been drawn up by the Norfolk Office of the PCC (OPCC). The Audit Committee routinely sees the Strategic Risk Registers.
- 3.31 The Crime Registry and Audit functions for Suffolk and Norfolk, which are part of the Joint Performance and Analysis Department (JPAD) 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 detailed on the risk register.
- 3.32 As noted in the 2016/17 Annual Governance Statement, following the introduction of Athena (a new major operational policing system) a detailed action plan was introduced to ensure the quality of crime recording was improved to levels that give confidence in the data. In response to this action plan; bespoke training is being delivered to supervisory staff to ensure a greater operational understanding of Crime Data Integrity (CDI). In addition specially trained data quality staff has been introduced to manage the data quality issues currently within the Athena system, supported by quality assurance measures within the business as usual Athena

processes. Data quality remains a key focus for the organisations with activity coordinated at Athena and Crime Data Integrity meetings

3.33 Project Athena remains on the Constabulary Strategic Risk Register. There are strong governance mechanisms in place locally and regionally to manage and monitor Athena risks, issues, developments and changes. The Norfolk and Suffolk Athena Strategic Board oversees all issues and risks as well as monitoring general performance, development of the systems and the Athena change work. Relevant updates are presented to the Joint Organisational Board chaired by the Deputy Chief Constable and all strategic risks and issues also reported into the Joint Chief Officer Team meeting. Regionally the governance matrix extends through the Athena Management Organisation (hosted by Essex) to PCCs and Chief Constables through Athena Management Boards.

3.34 Key areas of focus in relation to Athena have included:

- system performance issues (recent upgrades to the system have improved system performance);
- the interface between Athena and Police National Computer (manual workarounds have been implemented whilst system developments are being designed and rolled out to permanently resolve the issues);
- data quality (regular monthly audits are undertaken to identify any issues and ensure crime data integrity, reporting into Chief Officers); and
- the ability to access, query and extract management information (two change control notices have been developed and are being considered through the regional Athena governance mechanisms in order to provide alternate management information functionality and local options are also being considered).

3.35 As referenced in paragraphs 3.31 and 5.5, the Crime Registrar's team conducts regular audits of the Constabulary's Crime Data Integrity (CDI) compliance. These audits have highlighted a risk regarding the grading level the force may receive following its HMICFRS CDI inspection. There are various reasons for this, but primarily a failure to adequately record, or negate, allegations of crime at the first point of contact; often within the Violent Crime classification will impact on the grading. The local situation is being monitored by the CDI Group, chaired by T/ACC Sanford. Audit has been increased, visits to forces obtaining 'Good' grades have recently taken place to look at best practice, a member of the Norfolk audit team has supported HMICFRS in undertaking other inspections and the Norfolk 2020 team is currently reviewing working practices within the Control Room.

3.36 Even with the additional flexibility available to the PCC for precept increases in 2018/19 and 2019/20; over the medium term, real terms reductions to balance the budget are required to protect reserves, finance inflation and pay awards (the public sector pay cap has been lifted) and meet operational demand pressures. By the end of the current year some £34m of annually recurring savings will have been found. Over the MTFP period to 2021/22 a further £9.2m is estimated to be required of which £4.6m has been identified. An earlier start was made on the 2018/19 budget and MTFP processes and this gave opportunity for the Chief Constable and PCC to take measured decisions as regards the budget reductions and investments that were required for 2018/19. Reserves of £5.5m are planned to be used over the MTFP period reducing them to around £10m, the minimally acceptable level, by 31 March 2022. Operational demands continue to put pressure on the budget and there was a budget overspend in 2017/18.

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

- 3.37 The Commissioner has a statutory duty to produce and publish an Annual Report which details performance for the previous year against the objectives and performance measures set in the Annual Policing Plan. Financial performance against the revenue budget, capital programme and levels of reserves is reported regularly through the Police Accountability Forum. The Annual Report and financial performance papers are published on the OPCC website.
- 3.38 The OPCC has received an award (for the third year running) for the quality of its website, which includes the transparency requirements set out by Regulations.
- 3.39 The Audit Committee (now meeting in public) has overseen the full programme of internal and external audit activity. See para 4.5 below.

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 also by comments made by the external auditor and other review agencies and inspectorates.
- 4.3 A full report was presented to the April meeting of the Audit Committee and the groups and processes that have been involved in maintaining and reviewing the effectiveness of internal control include the following:

4.4 Corporate Governance Working Group

- 4.4.1 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 PCC's and Chief Constable's Chief Finance Officer, the Head of Strategic, Business and Operational Services and the Head of Joint Finance together with one co-opted member of the Audit Committee. The officers have involvement in the oversight of the governance framework and its processes and are in a position to review its effectiveness.

4.5 Internal Audit

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

out the numbers of implemented recommendations and those which remain outstanding.

- 4.5.2 The external auditor (Ernst and Young LLP), re-appointed by Public Sector Auditor Appointments in 2017) is able to place reliance on the work of internal audit.
- 4.5.3 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.
- 4.5.4 The overall opinion for 2017/18 from the Head of Internal Audit was:

“TIAA is satisfied that, for the areas reviewed during the year, the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies have reasonable and effective risk management, control and governance processes in place. Also, there was evidence to support the achievement of value for money with regard to economy, efficiency or effectiveness of the systems reviewed. 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 which must be obtained by the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies from its various sources of assurance.”

The Head of Internal Audit’s Annual Report also includes the following statement:

“Control weaknesses: There were 8 areas reviewed by internal audit where it was assessed that the effectiveness of some of the internal control arrangements provided ‘limited’ assurance’. Recommendations were made to further strengthen the control environment in these areas and the management responses indicated that the recommendations had been accepted. It is noted that management directed internal audit to the weak areas, to assess the controls and support the organisations to improve on these areas. Action has already commenced on improvements to the control areas, which reduced the overall number of urgent recommendations and supports a positive overall opinion.”

More information on the ‘Limited Assurance’ audits is set out in paragraph 5.2.

4.6 External Audit and Other External Review Bodies

- 4.6.1 External Audit provides a further source of assurance by reviewing the annual accounts and value for money assessment and reporting upon internal control processes and any other matters relevant to their statutory functions and codes of practice. An unqualified audit report was issued on the 2016/17 Statement of Accounts at the end of September 2017 together with an unqualified value for money conclusion. The External Auditor’s Annual Audit Letter was issued in October 2017 and it did not identify any matters to be addressed.
- 4.6.2 The Constabulary is subject to almost continuous review by Her Majesty’s Inspector of Constabulary and Fire Service (HMICFRS) and a number of inspections were carried out over the period. Reports relating to Norfolk can be found on HMIC website:-
<https://www.justiceinspectorates.gov.uk/hmicfrs/?type=publications&force=norfolk&s&cat&year>

In the last audit report a number of Areas for Improvement (AFI) were reported on. During the 2017 fieldwork the HMIC considered evidence presented by the force for

those areas in their inspection key lines of enquiry, and accepted the force had improved in those areas. One AFI was carried forward from 2016 (**highlighted in bold**).

Of note are the following reports ([Comments/actions taken by the Constabulary in blue text](#)):-

PEEL: Police Effectiveness 2017

Only two areas were inspected,

- Protecting vulnerable people - Good
- Specialist capabilities - ungraded

The Constabulary maintained its gradings for the other three areas

- Preventing crime and tackling anti-social behaviour – Outstanding
- Investigating crime and reducing re-offending – Good
- Tackling serious and organised crime – Good.

Areas for improvement:

The force should ensure that appropriate supervision is put in place consistently to monitor the quality and progress of investigations involving vulnerable people.

In February 2018 the Force published its Investigation Management Policy for Children and Vulnerable Persons. The policy covers management oversight and investigation review periods with strategic aims to:

Prepare: Reduce harm caused to children & vulnerable persons & make the county a safe place for them to live

Prevent: children & vulnerable persons from becoming victims & prevent repeat victimisation

Protect: Safeguard children & vulnerable persons

Pursue: Prosecute those responsible for offending against children and vulnerable persons

The force should review its use of DVPOs/DVPNs and Clare's Law to ensure it is making best use of these powers to safeguard victims of domestic abuse.

Domestic Violence Protection Notices (DVPN) and their associated Orders (DVPO) have been used to good effect across Norfolk since they became available as an additional response to safeguard victims. Their use remains based upon a high risk assessment by the first attending officer at a Domestic crime, using the DASH question set to inform this risk assessment. The vast majority of DVPNs are awarded following request by Custody Investigation Unit which seeks them as part of their safeguarding responsibilities when dealing with perpetrators arrested for domestic related offences. Norfolk is fortunate to have

an embedded legal services team which manages the process through the magistrate's court. The MASH Domestic Abuse Safeguarding Team (DAST) is made aware of the issue of a Notice and monitors to see if that is turned into an Order at Court. It is then part of the safeguarding planning for the vulnerable victim, as well as the gateway to additional support from the IDVA service, provided by Leeway.

The issuing of DVPN/O is in the process of being formally recorded on the Force Crime and intelligence system, Athena, and this recording is being reviewed by CIU Management at the request of the head of CJS. We are also closely monitoring the new Domestic Violence and Abuse Bill as it contains new Domestic Abuse Protection Notices. The widening of the Notice to include Abuse rather than Violence would be welcome.

Clare's Law, or the domestic Violence Disclosure Scheme (DVDS) process has now been fully embedded into the Domestic Abuse Safeguarding Team (DAST) within Norfolk MASH. This places the process at the heart of the multi-agency environment, which aids the prompt formation of the Multi-Agency Panel to discuss and, where appropriate, agree disclosures. There are three main agency representatives on the panel, being the Police, Children's Services and Leeway (a domestic abuse charity), who provide the Norfolk IDVA service. If disclosure is authorised by the Panel then one of the disclosure team within the DAST will make the disclosure face to face, usually alongside one of the IDVAs. This process has recently been subject to review by the Detective Inspector in charge of the DAST team due to the Child Sexual Offences Disclosure (CSODs) process being brought into the Disclosure Team's terms of reference.

PEEL: Police Efficiency 2017

HMIC Overall Judgement: Good

Areas for Improvement

The force should undertake appropriate activities to understand fully its workforce's capabilities, in order to identify any gaps and put plans in place to address them. This will enable the force to be confident in its ability to be efficient in meeting current and likely future demand.

Workforce planning is an ongoing area of development for the force. Current key areas of work are:

- Launch of the new Local Policing Model. The new '2020 model' will help the Constabulary to meet current and future challenges by prioritising the biggest risks to Norfolk's communities, investing in safeguarding, investigations and proactive capabilities.
- Building on the work undertaken in 2016 to centralise workforce data a corporate needs analysis was undertaken, and a force training plan has been completed.
- Detective and Investigators Career Pathway programme has been developed for officers and staff and will be rolled out in 2018.
- A Succession Planning and Talent Identification programme has been drawn up, and will be roll out from February 2018.

PEEL: Police Legitimacy 2017

HMIC Overall Judgement: Good.

Areas for improvement:

The force should improve the quality and timeliness of updates to complainants, including matters of misconduct, in line with IPCC statutory guidance.

Guidance has been made available on the intranet advising those conducting investigations of their responsibility to update complainants every 28 days with meaningful updates and to make a record of all contacts. Contact with complainants is reviewed during the quality assurance process when the complaint is finalised by PSD. Complaints and conduct matters handled within PSD all include a contact log which includes contact with complainants, witnesses and subjects of the allegations.

The force should improve the level of understanding among its workforce so they can identify and respond appropriately to initial reports of discrimination at the earliest opportunity

Guidance on how to investigate allegations involving complaints of discrimination is available on the Professional Standards Department Force intranet site. This guidance also points to the Independent Office for Police Conduct guidance on these matters. Further research of the complaints data is required to establish whether there are lessons to be learned. This is covered within initial recruitment and then refreshed within Personal Safety Training.

The force needs to ensure that selection and promotion processes are open and fair, and are perceived to be so by the workforce.

The National Police Promotion Framework process for Sergeants and Inspectors has been revised and the Constabulary now works with College of Policing in the design of its assessment exercises. Feedback has been positive following the pilot process in the latter part of 2017. The Recruitment and Selection Code of Practice has been drafted and contains appendices concerning promotion at levels above Inspector, and how to manage acting and temporary appointments. The new promotion process, for more senior ranks is being piloted in Norfolk for Superintendents. Again the Constabulary is working with College of Policing in the design of assessments. Additional work is being undertaken to develop a postings framework that will identify when and how posts, particularly Sergeant posts, should be filled.

The force needs to ensure that the staff performance assessment framework is applied consistently and fairly across the entire organisation and that staff consider it valuable in supporting their development

The PDR process was launched in April 2016 and continues to be developed. A working group with a diverse range of stakeholders is developing this, and running focus groups in their area, for the improved process to go live in April 2018. The overarching aim for the group is to ensure that the PDR process is relevant, not time consuming and appropriate for everyone regardless of their career or development aspirations. Phase 1 of the project is focused upon ensuring that the process is fit for purpose and is being used throughout the organisation, whilst Phase 2 will focus on an online solution to allow easier reporting, tracking and updating of PDRs.

- 4.6.3 Information Management - Following the audit undertaken by the Information Commissioner's Office (ICO) in April 2016 across Norfolk/Suffolk Constabularies, work has progressed to action the recommendations to help reduce the risk of non-

compliance with the Data Protection Act. Resourcing levels were reviewed and three temporary appointments, to end March 2019, are in place, addressing the information sharing, auditing and compliance requirements. The audit findings continue to be progressed and managed through the Information Management Steering Group.

- 4.6.4 Information Management dealt with a number of data breaches in 2017 of which none were referred to the Information Commissioner's Office (ICO) as they have either been contained between the relevant parties or not of serious enough impact to warrant referral. All data breaches reported to Information Management are thoroughly investigated and the final report is considered by the respective force Deputy Chief Constable (Senior Information Risk Owner (SIRO)) for a final decision as to whether to refer to the ICO. At present there is no mandatory requirement to refer data breaches to the ICO, however, this will change when the new Data Protection Act 2018 becomes law in May 2018. High risk data breaches have to be referred to the ICO within 72 hours.

4.7 Police and Crime Panel

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

4.8 Audit Committee

- 4.8.1 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.
- 4.8.2 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.
- 4.8.3 Members have continued to receive briefings and training through the year and one vacancy has been filled.

5. Significant Governance Issues

- 5.1 Those internal control issues identified in the 2016/17 Annual Governance Statement have been subject to follow up by Internal Audit. Reconciliation of tax and national insurance deductions relating to 2015/16 remains outstanding; however, payments have been made to HMRC. The latest position is that an 'Earlier Year Update' process will be run and HMRC provided with the correct information on the 70 affected staff records.
- 5.2 However, there were eight areas reviewed by internal audit in 2017/18 where it was assessed that the effectiveness of some of the internal control arrangements provided 'limited assurance' (Purchase Cards, Data Quality Arrangements for Athena, Absence Management, Management of Police Information [MOPI], Payroll, Overtime, Expenses and Additional Payments, Corporate Policies and Learning and

Development – Skills). Recommendations were made to further strengthen the control environment in these areas and the management responses indicated that the recommendations had been accepted. A summary of the findings in each business area is set out below:

- The Purchase Cards audit has resulted in a 'limited assurance' assessment for 2 years in a row now. The spending on the cards is not material (£93,000 for April to August 2017) and there is no evidence of any inappropriate use of the cards. The 'limited' assessment arises because there were 5 priority 2 and 3 recommendations; all of which are in hand. A full review of the number of cards in use, the spending being charged to the cards and the policy and procedures will be carried out over the next few months.
- The Athena Data Quality audit recommendations are complex and Athena is referenced elsewhere in this report. The audit report contained 4 priority 2 and 3 recommendations.
- The Absence Management audit identified that the various systems in use record sickness in different ways (not user errors). Further training of managers is needed to ensure that rest days and free days are not included within sickness periods (this does not affect reported sickness figures as 'working days lost' exclude rest and free days). Line managers also need to be reminded of the requirement for Attendance Support Meetings and of the option to refer to occupational health. There were 5 priority 2 and 3 recommendations.
- The Overtime, Expenses and Additional Payments audit has revealed examples of invalid claims not complying with guidelines and a risk that expenses could be claimed through two separate systems. There were 4 priority 2 and 3 recommendations.
- The Review of Policies Management has identified policies that are outside the scope of the Policy Unit, and for which accountability is unclear. 25% of policies are past their review date although this is a big improvement on the 81% when the Unit was formed. There were 7 priority 2 and 3 recommendations.

The final 3 'Limited Assurance' audit reports each contain one 'Urgent' (priority 1) recommendation. These relate to serious control failures that need to be put right as soon as possible.

- Compliance with the Management of Police Information (MOPI) requirements is an issue for all police forces. A project has been underway for some time and software developed to interrogate some 35 systems which hold information. Some manual records need to be transferred to electronic format. The matters identified by Internal Audit are known and a Project Board is in place to oversee the activity. The priority 1 recommendation is set out in Appendix A along with the management response and the timetable for dealing with the issue.
- The Payroll audit again highlighted the problem described at 5.1 above and also made recommendations about continuing to ensure there is compliance with IR35 (contractors to be paid via payroll) and about self-certification of on-call payments where an immediate system change is being implemented. The priority 1 recommendation is set out in Appendix A along with the management response and the timetable for dealing with the issue.
- The Learning and Development (L&D) Recording of Police Officer Skills report has identified problems with the recording of skills on the ERP system, especially if the training has not been arranged by L&D. Also the system is not being used effectively to book and fill courses. The priority 1 recommendation is set out in Appendix A along with the management response and the timetable for dealing with the issue.

- 5.3 In 2016/17 a number of internal audit recommendations made reference to the Enterprise Resource Planning System. A project is underway (commenced May 2017) to ensure that the system is running as efficiently and effectively as possible with business processes aligned and reducing the administrative burden for supervisors and managers.
- 5.4 All recommendations in Internal Audit Reports are subject to follow up with a detailed report being presented to each meeting of the Audit Committee and to the Joint Constabularies Organisational Board (Delivery)

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

Lorne Green
Police and Crime Commissioner for Norfolk

Simon Bailey QPM
Chief Constable of Norfolk

Mark Stokes
Chief Executive
Office of the Police and Crime Commissioner

John Hummersone FCPFA
Chief Finance Officer

Date: 24 August 2018

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.

PAYROLL

Rec.	Risk Area	Finding	Recommendation	Priority	Latest Update	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
4	Compliance	The Enact system does not have adequate system controls in place for approving of on-call payments. Audit sample testing identified that Enact allows employees to self-approve on-call payments, as well as those not designated as the authorised signatory for that employee.	System controls on Enact to be investigated, to ensure Enact forms can only be approved by the relevant authorised signatory and prevent employees from approving their own Enact forms.	1	<i>Enact has only one more year under contract, and the intention is not to renew this product. Instead a review is underway into products that are either already part of the Oracle ERP suite, or integrate into that platform.</i> <i>The supplier of EnAct has developed a solution at no cost to us. The update will be released when testing is completed.</i>	31 August 2018	Head of Transactional Services

Management of Police Information

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
2	Directed	<p>Police information is currently stored on 35 computer systems. The 35 computer systems that are currently used by the Constabularies are held on a series of separate, unlinked systems.</p> <p>There is a search engine called GENIE in place, which provides the capacity to find information in 30 of the 35 systems that have been used by the Constabularies for recording of police data. The remaining five electronic systems cannot be searched through GENIE and require separate searches to be made.</p> <p>A project plan has been developed within Information Management, however requires resource allocation and completion to take forward.</p> <p>There is a risk that the other five systems are not fully searched and incorrect information is given out and or incorrect decisions are taken. In addition, hardcopy data is also held and in some cases may need to be checked (refer to recommendation 4).</p>	<p>A project plan, including allocation of resources/IT resources be completed, to enhance GENIE and enable the five electronic systems excluded from the GENIE search to be incorporated into this search. The project plan to have clear target dates and officers assigned to each action so that progress can be monitored accordingly.</p>	1	<p><i>It is planned to include these systems in the next phase.</i></p> <p><i>We are currently looking at implementing the Genie Data Quality tools over the information that we currently have in Genie and develop these so that the MoPI grouping and dates can be generated by the system. This has been identified as a greater advantage than having the other systems within Genie at this time due to the inability to target reviews and deletions other than by a manual process of it being triggered by an external input e.g. person writing in for deletion. The Clearcore work will take many months to fully implement this will be totally resource dependent.</i></p>	1 April 2020	Records Manager

Learning and Development – Skills

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
7	Compliance	<p>ERP does not have an accurate record of police officers skills. Individual departments provide training outside of Learning and Development, such as intoximetre, as well as departments such as Firearms and Specialist Operations maintaining separate / differing records to the central Learning and Development department.</p> <p>The Resource Management Unit, when assigning shifts, will refer to ERP to ensure that they select staff that have the appropriate qualification/skills.</p> <p>Without utilising ERP as the central record for all training and skills, training officers may not be fully utilised and appropriately trained and skilled officers may not be selected for suitable shifts or the same officers selected for extensive periods of time.</p>	<p>A full review of the skills data recorded on ERP to be undertaken, requesting skills data held and trainers from individual departments, to ensure that ERP has an accurate record and can be used to identify skill requirements and gaps across the forces.</p>	1	<p><i>The ERP skills review is well underway. The findings are being fed into the ERP Board for future changes to the ERP system, which will require change requests. The ERP Board has agreed the procurement of new management information software for the ERP system, which will also provide assistance in this area.</i></p>	06/07/18	<p><i>Temporary Chief Inspector – Operational Training Manager</i></p>