

ANNUAL GOVERNANCE STATEMENT FOR THE POLICE AND CRIME COMMISSIONER FOR NORFOLK AND THE CHIEF CONSTABLE OF NORFOLK 2015/16

1. Background

- 1.1 This Annual Governance Statement covers the financial year 2015/16 but extends to cover the period to the signing of the Statements of Accounts at the end of September 2016. This statement is an opportunity to demonstrate compliance with the Police and Crime Commissioner's 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 a newly adopted 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]). **NB This new guidance is effective from 2016/17 but the opportunity has been taken, with the arrival of the new PCC, to use it to update the governance arrangements and draft this Statement.**
- 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 the Chief Finance Officer of the Police and Crime Commissioner and the Chief Finance Officer of the Chief Constable (as amended December 2013). However, please see further commentary at 3.7 below.
- 1.7 This statement 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 internal controls 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 2015/16 (ending 31 March 2016) 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. All staffs have been made aware of the requirements of the Code of Ethics and where necessary this is enforced for police officers by the Police (Conduct) Regulations and for police staff by the Police Staff Council Misconduct Procedures. A Code of Conduct based on the Code has also been adopted by the PCC, Deputy PCC and staff of the OPCC.

- 3.6 Formal policies also exist in respect of whistle blowing, public complaints, anti-fraud and corruption and the need to maintain a register of interests. 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.
- 3.7 **Note:** 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 Norfolk Chief Constable. The CIPFA Code says that a joint CFO is not 'envisaged' in view of the separate corporations sole, but the arrangement has been working well. There are separate employment contracts in place for each of the two roles and the arrangement has been extended until May 2017.

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 make arrangements for providing information and obtaining the views of people within each neighbourhood in accordance with Section 34 of the Police Reform and Social Responsibility Act 2011.
- 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.
- 3.12 The previous PCC held a countywide budget consultation asking Norfolk people whether they agreed to a 2% precept rise for 2016/17. More than 2,300 people responded with over 64% in favour of a rise. Political groups and key partners were also consulted. The PCC holds regular public meetings (Police Accountability Forum) to hold the Chief Constable to account. The new PCC wants to engage much more widely for the 2017/18 budget.
- 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 number of independent advisory panels including the Independent Advisory Group (IAG).

- 3.14 The Constabulary measures the satisfaction of service users through the use of public surveys and reports to the Office of the PCC on levels of satisfaction as one of the agreed Police and Crime Objectives. This is done in accordance with Home Office requirements.
- 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 driver has been to maintain the effectiveness of operational and organisational support but to drive out savings through economies of scale 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 costs. 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 The previous Commissioner published the first Police and Crime Plan for the period 2013/14 to 2016/17 in accordance with the Police Reform and Social Responsibility Act 2011. This established the PCC's vision and objectives for residents and service users. Following the PCC's first year in office the Plan was refreshed in 2014 to take account of the commissioning strategy and framework and to also make it more user-friendly and accessible. This approach has been endorsed by the Norfolk Police and Crime Panel. An annual report is also produced that provides an update on the PCC's progress against the delivery of the Police and Crime Plan.
- 3.18 The new PCC has consulted widely on his new Plan (2016/20) which will be published in the autumn.
- 3.19 There is a co-ordinated process for strategic and medium-term financial planning (MTFP). The most recent MTFP covers the period 2016/17 to 2019/20. The Chancellor announced in his autumn statement on the 25th November 2015 that the funding settlement for police would be significantly better than previously expected, and the overall settlement for total police funding would be 'protected' at 2015/16 cash levels. In the provisional Police Grant Report on 17th December 2015, the Minister of State for Policing said "For 2016/17 direct resource funding for each PCC, including precept, will be protected at flat cash levels, assuming that precept income is increased to the maximum amount available." As a result, and whatever the PCC decides about precept increases, budget reductions will still be required to finance pay awards, price increases 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 Plan reflects the strategic aims of the Constabulary and the PCC. The financial strategy reflects the corporate and operational objectives of the Constabulary and 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 has been established to oversee all collaborative activities on a day-to-day basis, monitor progress against the agreed programme and report upwards into a Joint Norfolk and Suffolk Chief Officer Team and the PCCs.

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. This is then used to inform the development/review of Police and Crime Plans, inform the development of local policing plans and performance frameworks and is shared with partners to 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 and provide a comprehensive account of the issues, taking into consideration of any existing research or 'what works' evidence to inform strategic and tactical action plans and decision making. These strategic profiles are then used to inform the overall Strategic Assessment.
- 3.25 The Joint Performance and Analysis Department (JPAD), under the lead of the Head of Department, 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 Both Norfolk and Suffolk Constabularies have accepted that this area requires improvement and have recently approved a new Leadership and Development Strategy.

The 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.

The Professional Development Review process has been relaunched and the documentation will be electronic.

HMIC's PEEL Spring 2016 inspection covered Legitimacy, Leadership and Efficiency. The results of the inspection will be known later in the year and will be covered in the 2016/17 Annual Governance Statement.

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

- 3.28 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.
- 3.29 The Crime Registry and Audit functions for Suffolk and Norfolk are also now part of JPAD. By carrying out independent and rigorous audit of crime and incident recording, they provide 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.
- 3.30 The introduction of Athena (a new major operational policing system) in October 2015 had the effect of reducing the quality and availability of performance data to the PCC. An action plan to deal with emerging Athena issues is being worked through to ensure the quality of crime recording returns to satisfactory levels.

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

- 3.31 The Commissioner produces and publishes an Annual Report which details performance for the previous year against the objectives set in the Annual Policing Plan. Financial performance against the revenue budget, capital programme and levels of reserves is reported regularly.
- 3.32 The OPCC has received an award for the quality of its website, which includes the transparency requirements set out by Regulations.
- 3.33 The Audit Committee (now meeting in public) has overseen the full programme of internal and external audit activity. See details 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 June 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 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. They have 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.
- 4.5.2 The external auditor (Ernst and Young LLP, appointed by the Audit Commission in 2012) 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 2015/16 from the Head of Internal Audit was

“I am satisfied that sufficient internal audit work has been undertaken to allow me to draw a positive conclusion as to the adequacy and effectiveness of Norfolk Police and Crime Commissioner’s and Chief Constable’s risk management, control and governance processes. In my opinion, Norfolk Police and Crime Commissioner and Chief Constable have adequate and effective management, control and governance processes in place to manage the achievement of their objectives.”

4.5.5 This positive opinion is an improvement on the prior year.

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 2014/15 Statement of Accounts at the end of September 2015 together with an unqualified value for money conclusion. The External Auditor’s Annual Audit Letter was issued on 9 October 2015 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 (HMIC) 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/hmic/?type=publications&force=norfolk&s&cat&year>

Of note are the following reports:-

PEEL: Police Effectiveness (Vulnerability) – 15 November 2015

HMIC Overall Judgement: Good. No areas for improvement.

PEEL: Police Efficiency – 20 October 2015

HMIC Overall Judgement: Outstanding. No areas for improvement.

Child Protection Post Inspection Review – 27 October 2015

Review with no grading.

Findings summary “Norfolk Constabulary had developed a robust governance process to ensure that officers correctly recorded information on the use of police protection powers. Overall, the constabulary had made good progress with safeguarding children involved in domestic abuse – an action plan on domestic abuse was in place and being actively implemented. However, problems remained in the multi-agency safeguarding with the lack of assessment for cases considered as standard risk.” In response additional staff have been deployed to ensure that incidents assessed as presenting a “standard” risk are reviewed.

PEEL: Police legitimacy 2015

HMIC Overall Judgement: Good.

Areas for improvement:

“The force should ensure that stop and search records include sufficient reasonable grounds to justify the lawful use of the power, and that officers fully understand the grounds required to stop and search.” In response the Force has adopted ‘Best Use of Stop Search’ (Home Office best practice). Work is ongoing to increase officers’

understanding of what constitutes 'reasonable grounds'. Additional training and monitoring are helping to ensure compliance.

PEEL Police effectiveness 2015

HMIC Overall Judgement: Good.

Areas for improvement

The Constabulary should add relevant data from partner agencies to its serious and organised crime local profile, and ensure that it has a local partnership structure in place with responsibility for tackling serious and organised crime.

All strategic profiles (including those on organised crime based issues/themes) include partner agency data where possible and can be accessed. In addition, the Head of JPAD sits on a number of forums which are all looking at data and information sharing and joint working. Joint work is also underway with Norfolk County Council to conduct joint analysis around domestic abuse looking at indicators and interventions as well as looking at case study analysis of offenders and victims.

National Recommendations

When HMIC completes Thematic Inspections both Force specific and National Reports are produced. Often the National Reports list a number of recommendations for all forces to consider.

In August 2016 a request was received from HMIC to review a template with 81 recommendations taken from National Reports dating back to 2013. Information was sort on recommendations:

- Not being progressed
- That will be progressed
- That are being progressed
- Completed.

Out of the 81, 66 were submitted as being complete with work being progressed on the remaining 15. One of the outstanding actions predates the 2015 reports (2013). Progress is being monitored by Chief Officers.

NB. A response to the submission is awaited from the HMIC.

4.6.3 The Information Commissioner's Office (ICO) carried out some audit work in April 2016 across Norfolk/Suffolk Constabularies.

The ICO is responsible for enforcing and promoting compliance with the Data Protection Act 1998 (DPA) and the audit covered (1) Records Management (Electronic & Manual), and (2) Data Sharing.

From a rating of (1) High Assurance, (2) Reasonable Assurance, (3) Limited Assurance and (4) Low Assurance, the ICO rated Norfolk/Suffolk Constabularies as having Reasonable Assurance, i.e. there is a reasonable level of assurance that processes and procedures are in place to deliver data protection compliance. The audit identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with the DPA.

To effectively address some of the areas of non-compliance and satisfy the ICO during their follow up audit scheduled next year, resourcing levels will need to be reviewed (and they will be as part of the 2017/18 budget considerations), particularly if the recommendations associated with Data Sharing and annual Data Protection training are to be fully adopted.

The audit findings will be progressed and managed through the Information Management Steering Group.

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.
- 4.7.2 The Panel has powers of veto in relation to the appointment of the Chief Constable and the PCC's proposed precept. This latter power was exercised for the 2016/17 precept proposal. The new PCC is establishing his engagement with the Panel on all relevant matters.

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.
- 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 The Committee has assessed its own performance during the year and the need for a number of small improvements has been identified. Members have continued to receive briefings and training through the year. Two vacancies within the committee have been filled during the summer months.

5. Significant Governance Issues

- 5.1 The significant governance issues identified in the 2014/15 Annual Governance Statement have been addressed as described in that Statement. Physical access to buildings remained an issue but a follow-up audit by Internal Audit (TIAA) concluded that security arrangements had been greatly improved and were now fully acceptable.
- 5.2 There were three 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.
- 5.3 The three areas were Payroll, Purchase Cards and Proceeds of Crime arrangements. All the audit recommendations have now been completed with the exception of payroll where reconciliation of tax and national insurance deductions with payments made to HMRC is ongoing.

6. Assurance Summary

- 6.1 The Corporate Governance Working Group has concluded that the governance arrangements are fit for purpose in accordance with the governance framework. Those areas to be specifically addressed are set out in Section 5 above.
- 6.2 Finally, we are satisfied that this report is an accurate summary of 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: 27th September 2016

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.