

IAG Specified Information Audit Report

Background and purpose of the audit report

Police and Crime Commissioners (PCCs) are required to publish certain information to allow the public to hold them to account. The Police Reform and Social Responsibility Act 2011 requires an elected local policing body (the PCC) to publish any information specified by the Secretary of State. The Elected Local Policing Bodies (Specified Information) Order 2011 ('The Order') and amendment 2021, sets out the information which must be published. The Order ensures that PCCs will make available to the public information on:

- Who they are and what their role is
- What they spend and how they spend it
- How they make decisions
- What their priorities are and how they are performing
- Lists and registers

Since 2014 CoPaCC, an independent organisation designed to compare PCC's, have carried out annual assessments in order to judge whether the Office of Police and Crime Commissioner's (OPCC's) fulfil their statutory obligations for transparency as required by The Order (also known as SIO) based on the information published on their websites. Each year, the OPCC's who were judged as having reached a satisfactory standard were awarded the CoPaCC Open and Transparent Quality Mark. As of 2021 however, CoPaCC are no longer able to provide this service due to lack of funding.

With CoPaCC no longer carrying out their annual assessments, this left a gap in the independent scrutiny of the OPCCN. In order to rectify this, the OPCCN have created an annual auditing arrangement with members of the Independent Advisory Group (IAG) in order to ensure the office's ongoing transparency. The Home Office will also carry out assessments of the SIO's nationally. The Independent Advisory Group is a group of residents from different community backgrounds who share their views and advice with the aim of improving the quality of policing services. The diversity within the group and their knowledge of policing whilst remaining independent residents of Norfolk, makes the IAG members ideal candidates for carrying out an independent assessment of the SIO on the behalf of the OPCCN. For more information on the group please see here: [Independent Advisory Group | Norfolk PCC \(norfolk-pcc.gov.uk\)](https://www.norfolk-pcc.gov.uk/independent-advisory-group)

Findings for October 2022 - Overall summary and recommendations:

The website is well presented, easy to navigate and contains a large volume of useful information. With respect to the specific SIO information the vast majority was successfully found and, in most cases, it was relatively simple to find. However, a number of issues were identified:

1. It is difficult to be confident that the information found is current, apart from minutes of meetings. Whilst most reports have dates on them (they are not always in a consistent format) there is nothing to say it is the latest/current version. The complaints procedure dates from 2019 – is that current or not? They could for example have a last updated and next review date.
2. Some external reporting is either out of date or not annual as specified in the SIO. As an example, section 7b (part a) refers to an annual report on effectiveness, efficiency and legitimacy

of the police force maintained by the elected local policing body. The SIO page links to the Police Effectiveness, Efficiency and Legitimacy report from PEEL report from 2018/2019?

3. There are plenty of details on the grants made, albeit slightly hard to find. However there doesn't appear to be much feedback on whether the grants achieved what they were aimed to achieve. There is a lack of detail on who requests grants and the roles of the staff making financial decisions.
4. Some of the information was only found via the SIO page – it would be helpful if the public knew the SIO page linked to information that allowed the public to hold the PCC to account.
5. This report has had to assume that the website is accurate when defining the scope of activity. For example, section 5d asks for information on each decision of significant public interest. There is a section on decisions but it's hard to comment on whether these are all the decisions of public interest made, particularly when they may have been made "in a meeting or otherwise".

Recommendations

1. Agree a standard approach to documentation that allows the user to know that the information on the website is current and when it will next be updated.
2. Provide more details and transparency on financial decisions and the success/failure of grants. Include job titles for OPCC Officers making decision. Show where the initial enquiries or applications for funding arrived at the door of the PCC and to whom in the first instance they were allocated and who was promoting them. Name, address, role, why, what for etc. such information would add further transparency. Detail how successful or no grants were.
3. Promote the fact that the SIO page contains statutory information for the public to assess the performance of the PCC.
4. Keep an updated list of all the public meetings that should/do take place and all the decisions that have been taken.
5. Ensure where annual/quarterly reports are supposed to exist that they do or there is an explanation of why the data is not present.
6. Monitor Freedom of Information request to see how successful the website is at providing the information the public needs

Findings per section/IAG member

Audit report date: 12/10/22

Audit carried out by: Juels Copley

SIO areas audited: Section one and two

Findings:

Section One - In relation to the relevant office holders of the elected local policing body

Section Content

- Name of relevant Office Holder
- Address for correspondence of each relevant office holder
- Salary of each relevant office holder
- Allowance paid to each office holder
- Register of interests
- Number of complaints brought to crime panel

Section Findings

- Information on the relevant office holder, address, salary, allowances and interests is present and easily accessible via specifically indicated arrows and links. There are some additional documents which supports the web based content.
- All the supporting documents were present and in an easily accessible format (e.g. PDF), this ensures that all devices can assess the information and will meet the accessibility criteria.
- The information within the documents is clear (e.g. expenses and complaints), the content on expenses is individually dated and clearly allocated to specific office holders.
- All the documents are dated and within six months of issue however, the date format is inconsistent, some documents have a stated date, others an updated or reviewed date. For consistency the date formats should be standardised (e.g. Last updated and Next review date).
- The complaints part of section 1 includes a range of web page content on the complaints process, who to contact and the mechanisms for contact including postal address, email addresses and telephone numbers. There are 2 complaint panel reports the latest dated 6/22 indicates no complaints received but 4 FOI request all cost related. It is not clear who sits on this panel or how regularly it is formed. There is information on the delegated authorities to the OPCC's office.

Section Two -In relation to the staff (and, in relation to gifts and hospitality, also the relevant office holders) of the elected local policing body

Section Content

- the number of members of the staff
- Proportion of Staff
- Organisational Structure
- Job Title, Responsibilities and Salaries

Section Findings

- 28 staff indicated with a breakdown of full/part time, the information didn't include a proportion although the reader could work it out it also didn't include any corporate goal on gender diversity. The information did not include a date when the information was last updated.
- The numbers of staff by male and female gender are indicated but not the proportions/percentages and there is nothing present for other gender identifications or ethnic minorities. This maybe that there is no representation rather than an omission of data collection and transparency. The information is not dated so it is not possible to say whether this information is current.
- There is an organisational chart with role titles but no allocated names to the roles, this numbers are consistent with the numbers of FTE indicated in 1.
- Job titles and descriptions are only available for CEO Mark Stokes and CFO Jill Penn who have their own dedicated pages which includes a raft of additional PDF documents on interests and appointments.

There is a breakdown of salaries and grades in a separate document for the 28FTE which aligns with the organisational structure chart.

Audit Report Date: 12/10/22

Audit carried out by: Les Rowlands

SIO areas audited: Sections three and four

Findings:

Section Three - In relation to the income and expenditure of the elected local policing body

Section Content

- Total budget of the elected local policing body
- The precept issued by the commissioner
- Each anticipated source of revenue of the elected local policing body
- Proposed expenditure of the elected local policing body
- Annual investment strategy of the elected local policing body
- Each crime and disorder reduction grant made by the elected local policing body
- Each item of expenditure of the elected local policing body exceeding £500

Section Findings

- Grant information is easily accessible but there does not appear to be any consistent information about why the grants have been made or for what specific purpose. The LMS document asks for “purpose and reasons” but there is no information to say that the grants have ‘made a difference’ or been ‘good value for money’. However, general thank you type feedback from the Public Body is occasionally available. Although its appreciated that the information may be ‘sensitive’ and not strictly for public knowledge does grant funding ever have any SMART objectives attached to what is regular tranches of tax-payers money paid to them? As it stands I’m unsure there is enough information about this. EG: BRITISH RED CROSS £6.047.45 & SUE LAMBERT TRUST £45.000 x2 within two weeks “Grants to Voluntary Bodies” why, what for, how is money going to be used, etc would add more transparency.
- I cannot find an audit trail for grants given to VICTIM SUPPORT apart from: amount paid: £78.750 “Grants to Voluntary bodies” which may be because Norfolk & Suffolk Victim Care is run by NATIONAL VICTIM SUPPORT which has a budget of around £41.000.000. Again, it would be helpful to know what each grant paid out is being specifically spent on.

The decisions page on the OPCC website shows a very wide range of financial allocations which are justified by each individual OPCC Officer (I would like to see their job title) but it does not show how the initial enquiries or applications for funding arrived at the door of the PCC and to whom in the first instance they were allocated and who was promoting them. Name, address, role, why, what for etc. such information would add further transparency.

Section Four - In relation to the property, rights and liabilities of the elected local policing body

Section Content

- The identity of any premises or land owned by, or occupied for the purposes of, the elected local policing body

- A copy of each contract with a value exceeding £500 to which the elected local policing body is or is to be a party
- A copy of each invitation to tender issued by the elected local policing body in relation to a contract which the body expects will have a value exceeding £500.

Section Findings

- No major issues.

Audit report date: 12/10/22

Audit carried out by: Simon Guest

SIO areas audited: Sections five and six

Findings:

Section Five - In relation to the decisions of the elected local policing body

Section Content

- The date, time and place of each public meeting to be held by the elected local policing body
- The agenda for each public meeting held by the elected local policing body, and any report or other document that is the subject matter of an item on the agenda
- The minutes of each public meeting held by the elected local policing body, and of each meeting which is not a public meeting but at which matters of significant public interest arising from the exercise of the body's functions are discussed
- A record of each decision of significant public interest arising from the exercise of the elected local policing body's functions, whether made by the body at or as a result of a meeting or otherwise.

Section Findings

- This report has had to assume that the website is accurate when defining the scope of activity. For example:
 - section 5a asks for date and time of each public meeting and provides a list of public meetings. I cannot comment whether this is all the public meetings that have taken place.
 - section 5d asks for information on each decision of significant public interest. There is a section on decisions but it's hard to comment on whether these are all the decisions of public interest made, particularly when they may have been made "in a meeting or otherwise".
- It is not clear whether the information is up-to-date - the documents did not have statements saying they are current and you could only go on the date on the document to see if that was a reasonable date for currency. The complaints procedure is from 2019 so it may or may not be current.

Section Six -In relation to the policies of the elected local policing body

Section Content

- The policy of the elected local policing body in relation to the conduct of relevant office holders, including procedures for the handling of qualifying complaints and conduct matters
- The policy of the elected local policing body in relation to the making of decisions of significant public interest
- The policy of the elected local policing body in relation to records management
- The policy of the elected local policing body in relation to the handling of qualifying disclosures

Section Findings

- Most of the information was easy to find and it was all clear. Some of the documentation could only be found via the SIO direct link which I don't think is good enough - the general public won't understand that unless it is made clearer.

Similar issues on how do you know if the information is up-to-date as with section 5.

Audit report date: 12/10/22

Audit carried out by: Simon Guest

SIO areas audited: Sections seven and eight

Findings:

Section Seven - In relation to the prevention of crime and disorder

Section Content

- A copy of any report required by the elected local policing body from the responsible authorities for a local government area
- Key national priorities for policing
- HMICFRS Inspections and Reports
- Reporting in relation to complaints

Section Findings

- Most of the reports in these sections had to be accessed via the SIO page – not sure how members of the general public would know about this unless the site is much clearer on what the SIO and is signposted as a recommended route in for this type of information.
- Some of the data accessible via the SIO page is either out of date or doesn't reflect annual reporting. There seem to be other reports on the OPCC services/performance page which are more up-to-date but are different reports to those linked to from the SIO. These other reports are OPCC reports and thus may not be relevant as they are not HMICFRS reports. As an example section 7b part a refers to an annual report on effectiveness, efficiency and legitimacy of the police force maintained by the elected local policing body. The SIO page links to the Police Effectiveness, Efficiency and Legitimacy report from PEEL report from 2018/2019 and the PCC comments on that report. Is this the right report and the latest review – if so it is clearly not annual? There are other OPCC reports such as the annual report which reviews the police operation but that isn't an HMICFRS report?
- I couldn't find the quarterly reporting data - the reports identified all contained annual figures.

Section Six - In relation to the independent custody visitor arrangements

Section Content:

- Information as to the operation of the arrangements

Section findings:

- No specific comments – information is available.

OPCCN response to the Overall summary and recommendations:

1. It is agreed that some information and documents are not clear as to whether they are the latest and most current versions. To rectify this the OPCCN will include creation dates, last updated or reviewed dates and/or next review date as applicable.
2. Due to the pandemic and other extenuating circumstances some external reports were suspended for some time and thus not in line with the usual annual requirements. However, the OPCCN should have ensured that the website was updated to relay that these reports were suspended for a time for full transparency to the public and will take this learning forward. The specific report mentioned by IAG was the HMICFRS PEEL report. This report had been suspended since the 2018/19 report due to the pandemic. A new report has now been released and can be found along with the OPCCN response here: [Inspections | Norfolk PCC \(norfolk-pcc.gov.uk\)](https://www.norfolk-pcc.gov.uk/inspections)
3. We should clarify that organisations and charities are either grant funded or contracted to deliver services and those are subject to a rigorous governance and performance framework managed by the OPCCN. We also utilise the [7Force](#) procurement policy during this process. Outputs and measures are published through grant agreements and contracts which are in the public domain. The PCC also provides reports to the [Police and Crime Panel](#) (PCP), a bi-monthly meeting which is held in public, detailing performance against his Police, Crime and Community Safety plan priorities.
There is a section on the OPCCN website dedicated to IAG and their role, however, the OPCCN is now developing further information around the SIO and the IAG's role in its assessment for website inclusion.
4. The SIO requires certain information to be publish under 'The Order' and to achieve this with minimal duplication, the OPCCN have created the dedicated SIO page on our website to ensure this information is easily found, which has meant some information can only be found via this dedicated page as the information does not necessarily sit within other areas of the website. However, we will take this feedback and see what can be done to make the SIO page more relevant and give more clarity to the public what information can be found and the SIO's purpose overall. We hope that by having IAG members carry out the audit process that this too will increase public knowledge around the OPCCN and the SIO.
5. All decisions are made in line with the [decision making framework](#), which outlines how the OPCCN assesses the public interest in decisions made either by the organisation or during meetings such as the Strategic Governance Board (SGB). The OPCCN's decision notice webpage contains a link to each decision notice by year and links to an additional webpage where information regarding confidential decision notices are held. The confidential decision notices are regularly audited to establish if any notices can now be made public for greater transparency.
6. The OPCCN FOI decision maker will monitor FOI requests to review themes of requests made to ensure the website is providing the information the public needs.

OPCCN Response to other comments and feedback from IAG

Sections One and Two

Section One

Feedback around the complaints panel reports and who sits on this panel. This information can be found via a link on both the SIO page and the complaints page of the OPCCN website, which takes the user to the Norfolk County Council panel page. This page outlines the composition of the panel when the meetings are held as well as the related documents. To add this to the OPCCN page would be a duplication of information as this is a county council held meeting.

Section Two

Feedback received in relation to the staff of the elected local policing body. The Policy, Research and Equalities Officer has taken this feedback and when updating the information will provide an updated date to ensure full transparency. In addition, we have discussed the implications of providing a further breakdown of genders beyond male and female. The SIO presently only has the legal requirement to provide the number of women working for the OPCCN. It is felt that at this stage, to provide data around Non-Binary and other genders would have the potential to 'out' people who may not wish to be so.

The auditor correctly established the OPCCN has no set corporate goal on gender diversity. However, using the Association of Police and Crime Commissioners (APCC) Equalities Framework the OPCCN has created a 4-year strategy. A review of recruitment is part of the strategy and will have the aim of ensuring the processes, procedures and policies are as inclusive and flexible.

Sections Three and Four

Section Three

Grant agreement details are contained within the decision notices published on the OPCCN website under the decision notice page and therefore it would aid transparency if a link was included on the grant funding pages of the OPCCN website to the decision notice pages to allow individuals to see more information on the objectives of the grant allocation. Performance monitoring is undertaken within the OPCCN by the commissioning team and performance reports are provided to the Norfolk Police and Crime Panel. It is noted that job titles should be included when a member of OPCCN staff is populating a decision notice, and this will be fed back to the team and built into the Quality Assurance process for all future decision notice publications.

Section Four

No issues were found with this section.

Sections Five and Six

Section Five

Query presented around the dates and times for public meetings. Future meeting dates for the public PCC Accountability Meeting (PAM) are listed on the OPCCN website along with the frequency and information regarding the private Strategic Governance Board (SGB) and Estates Governance Board

(EGB) meetings. The agendas, papers and minutes for previous PAM's are found on the website and kept in line with the OPCCN's retention schedule.

The auditor correctly noted the complaints procedure document is from 2019 and not clear if this is the most recent document. The complaints procedure document is currently being reviewed and amended so will be published as soon as possible and will include the relevant review dates for future versions.

Section Six

Feedback received concerning the SIO webpage being the only way some information could be found, this was addressed in the overall summary and recommendations section above. The OPCCN will look to see how documents and the SIO overall can be presented with better clarity but avoiding duplication.

Sections Seven and Eight

Section Seven

Comments received relating to the some of the data accessible via the SIO page being out of date or not reflecting the publication requirements. Where the reporting is provided by third parties such as the Independent Office for Police Conduct (IOPC), the OPCCN is unable to influence an increase in frequency for the publication due to extenuating circumstances within the IOPC. As soon as reports are made available these are uploaded onto the IOPC website which is linked from the SIO page. Other comments relating to this section have been responded to in the overall summary and recommendations response above.

Section Eight

No specific comments relating to this section received.

Audit Conclusion

After CoPaCC were unable to continue their annual assessment of the OPCC websites regarding the Specified Information Order, the OPCCN worked with members of IAG to establish a new annual audit routine. The OPCCN feels this has been a success and valid feedback from the members has been received. The staff of the OPCCN will work to rectify any issues not already corrected that were relayed during this audit to better serve the people of Norfolk in a transparent manner. The OPCCN will seek to continue this method of annual auditing of the SIO and will work with the IAG members who choose to volunteer their time for this project. The Complaints and Compliance Officer will engage with IAG in August 2023 to ask three to four IAG members (should this year's audit team no longer wish or are unable to participate) to carry out the second annual audit in October. Should new members become auditors, they will receive training in September 2023 to ensure they are happy with the process and report writing. The OPCCN will also seek to improve the way the SIO and audit process are publicised on the website.