

ANNUAL GOVERNANCE STATEMENT FOR THE POLICE AND CRIME COMMISSIONER FOR NORFOLK AND THE CHIEF CONSTABLE OF NORFOLK 2020/21

1. Background

- 1.1 This Annual Governance Statement (AGS) covers the financial year 2020/21 [but extends to cover the period to the signing of the Statements of Accounts in xxxxx 2021]. This statement is an opportunity to demonstrate compliance with the Code of Corporate Governance and the CIPFA Financial Management Code.
- 1.2 The Police and Crime Commissioner (PCC) and the Chief Constable for Norfolk are responsible for ensuring that their business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.
- 1.3 In discharging this overall responsibility, the PCC and Chief Constable are also responsible for putting in place proper arrangements for the governance of their affairs and facilitating the exercise of their functions, which includes ensuring a sound system of governance (incorporating the system of internal control) is maintained through the year and that arrangements are in place for the management of risk.
- 1.4 The Corporate Governance Framework, which sets out how governance 'works' for the PCC and Chief Constable, can be found on the PCC's website (www.norfolk-pcc.gov.uk) or may be obtained from the Office of the Police and Crime Commissioner for Norfolk, Building 1, 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 latest CIPFA Statement on the Role of Chief Financial Officers in Policing issued March 2021.
- 1.7 This AGS also explains how the PCC and Chief Constable have complied with the Code and also meets the requirements of Regulation 6 of the Accounts and Audit (England) Regulations 2015 in relation to the review of the effectiveness of the system of internal control and the publication of an annual governance statement.

2. The Purpose of the Governance Framework

- 2.1 The governance framework comprises the systems and processes and culture and values by which the PCC and Chief Constable are directed and controlled, and the activities through which they account to and engage with the community. It enables the PCC and Chief Constable to monitor the achievement of their strategic objectives and to consider whether those objectives have led to the timely delivery of appropriate, cost-effective services, including achieving value for money.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives; it can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the PCC's and Chief Constable's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them effectively, efficiently and economically.
- 2.3 However, good governance is not only about processes, rules and procedures. The governance framework should be applied in a way which also demonstrates the spirit and ethos of good governance. Shared values which are integrated into the culture of an organisation and are reflected in behaviour and policy are essential hallmarks of good governance.

3. The Governance Framework

- 3.1 The Chief Constable is responsible for operational policing matters, the direction and control of police officers and police staff, and for putting in place proper arrangements for the governance of the Constabulary. The PCC is required to hold the Chief Constable to account for the exercise of those functions and those of the persons under the Chief Constable's direction and control. It therefore follows that the Commissioner must satisfy himself that the Constabulary has appropriate mechanisms in place for the maintenance of good governance, and that these operate in practice.
- 3.2 The PCC has adopted a Corporate Governance Framework (including the Code of Corporate Governance) and a Scheme of Governance and Consent which includes Financial Regulations and Contract Standing Orders. These are reviewed periodically in accordance with requirements.
- 3.3 The governance framework has been in place throughout the financial year 2020/2021 (ending 31 March 2021) and [up to the date of the approval of the Statements of Accounts].
- 3.4 The key elements of the systems and processes that comprise the PCC's and Chief Constable's governance arrangements and how these adhere to the seven principles in the Code are set out below: -

Principle A – Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

- 3.5 The Police Code of Ethics, produced by the College of Policing, describes the principles that every member of the policing profession in England and Wales is expected to uphold and the standards of behaviour they are expected to meet. This Code applies to all those who work for the Constabulary, be they police officers, police staff, contractors or volunteers. Staff have been made aware of the Code of Ethics and its implications. Policies, procedures and training products are reviewed in line with the Code and it is

central to decision making using the National Decision Making Model. Where there are breaches of the Code of Ethics or the Standards of Professional Behaviour there is a positive duty to report these matters. The Joint Professional Standards Department receives such reports and these are investigated appropriately and in accordance with Police Regulations. A Code of Conduct based on the Code has also been adopted by the PCC and staff of the OPCC.

- 3.6 Following the enactment of the Police and Crime Act 2017 a number of Police Regulations changed on 1st February 2020 and these changes include the Chief Constable no longer being the appeal body for complaints from the public with the PCC now becoming the review body. Appeals are now referred to as a 'right to review'. Other changes include less serious misconduct matters being dealt with as 'Practice Requiring Improvement' which will involve line managers in improving the officer's performance rather than instigating formal misconduct proceedings. The OPCC and the Constabulary continue to work together to consolidate the implementation of the new regulations and processes. The OPCCN has appointed a part time Police Complaints Review Officer to deal with the new process and they have been in post since January 2020. The implementation of the new model has now been in operation since February 2020 and there have been no issues and the process is operating smoothly.
- 3.7 Formal policies also exist in respect of whistle blowing, public complaints, anti-fraud and corruption, declaration of business interests, gifts, loans and hospitality and disclosable associations. An Ethics Committee has been established to enable staff to raise for consideration ethical issues affecting the Constabulary to enable further improvement in the transparency, professionalism and ethical approach of staff, policies and procedures to such issues. A Joint Integrity Board has also been established with the aim of securing the internal confidence of staff and officers in the fair application of policy and process in matters of integrity and ethics and to ensure that the organisations manage risk and learn from cases to improve the service provided.

Principle B - Ensuring openness and comprehensive stakeholder engagement

- 3.8 The OPCCN's website contains details of the meetings the PCC holds with the public, partners, Chief Constable, Audit Committee and Police and Crime Panel. Agendas, reports and minutes are available for public scrutiny where appropriate and social and digital media are frequently used to inform people unable to attend and to summarise meetings and key decisions.
- 3.9 The Constabulary offers regular, direct updates via its social and digital channels including Twitter, Facebook, Instagram, Next Door, LinkedIn, 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 has recently revised their Community Engagement Strategy, and the updated version is to be published shortly and sets out how the force will effectively engage with the residents of Norfolk in accordance with Section 34 of the Police Reform and Social Responsibility Act 2011. Key aims include actively engaging with 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.
- 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 Strategy and Engagement Plans setting out how it will obtain the views of the community and victims of crime regarding policing. The OPCCN has a

Consultation and Engagement Officer to review, develop and deliver its engagement activities and oversee delivery of the Engagement Strategy. Following the PCC elections in May 2021 the Communications Plans and Engagement Strategy will be reviewed to take account of new PCC priorities.

- 3.12 The PCC held a countywide budget consultation asking Norfolk people whether they agreed to a precept rise for 2021/22. Key partners were also consulted. The results of the police budget 2021/22 consultation show that 54% of those who took part said they would be prepared to pay extra through the policing element of their council tax. The PCC holds regular public meetings (Police Accountability Forum) to hold the Chief Constable to account and hosts public Q&A meetings around the county where residents can quiz senior police officers about the policing of their neighbourhoods.
- 3.13 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. It also reviews public confidence through monitoring of results through the Crime Survey of England and Wales. Norfolk Constabulary also undertake a public perceptions survey that can be broken down to district level, which can be used to assess qualitative performance on feelings of safety and community confidence in policing.
- 3.15 Norfolk Constabulary collaborates extensively with Suffolk Constabulary as it has done since 2008. This formal collaboration is across a range of services including operational policing and back office functions. The PCC is required to give approval to collaborative opportunities before they can commence. The PCCs of Norfolk and Suffolk meet during the year to discuss and discharge their governance responsibilities. In addition to this there are governance arrangements that cover operational managers and Chief Officers. The main drivers have been to maintain the effectiveness of operational and organisational support and to drive out savings through economies of scale and efficiencies in order to protect front line resources wherever possible.
- 3.16 There are also services that are subject to ongoing regional collaboration. A Seven Force Strategic 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 The PCC elections in May 2020 were cancelled due to the COVID-19 pandemic and the elections took place in May 2021. The priorities and plan have continued as below for the extension of the PCC's term for the period of the accounts.

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 (OBB) principles. The budget for 2020/2021 proposed by the PCC was based on an increase in the council tax (following consultation) of £14.94 per annum for a Band D equivalent property. The increase in the precept has been used to invest in and improve services for the communities of Norfolk. The PCC's proposal was unanimously supported by the Police and Crime Panel. Savings were required to balance the budget but through central government funding for Operation Uplift it is possible to increase police officer numbers. 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, the Commissioner and the Norfolk Police and Crime Panel on performance against objectives. This includes detailed analysis and scrutiny of performance and compares performance against the most similar family of forces.

3.21 Proposals for collaboration go through a detailed process, designed to ensure that all options are considered, outcome and risk assessed and that all parties can sign up to formal agreements in the knowledge that future policy, performance and resource levels are recognised at the offset. Dedicated resources are in place to support those units subject to Norfolk / Suffolk collaboration, including the formulation of detailed business cases. The business cases are subject to review by senior officers and 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 the 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 considers all relevant internal and external factors that might impact upon policing, crime and disorder at county and local level, highlighting emerging issues, risks and threats. All operational issues are risk assessed using the nationally recognised Management of Risk in Law Enforcement (Morile) framework The Strategic Assessment is then used to inform the development and review of the Police and Crime Plans, and the local policing plans and performance frameworks. It also leads to the setting of the Operational Control Strategy 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 Norfolk Constabulary also produce an annual force management statement (FMS), which is a self-assessment that chief constables prepare and give to HMICFRS each year. The FMS explains the demand the forces expects to face in the foreseeable future and assesses this against the constabulary's workforce (capacity, capability and security of supply) and the extent to which current force assets will be able to meet the expected future demand. The FMS also assesses how the constabulary will change to cope with future demand and the potential effect of any residual risk of service failure.
- 3.25 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 such as drug offending, whilst also looking at organisational issues such as policing in a diverse society. 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 and help inform operational decision making.
- 3.26 The Strategic Business and Operational Services (SBOS) department undertakes analysis, research, and improvement and evaluation activity across the Constabulary, covering strategic, operational and performance reporting. SBOS also leads on policy, corporate risk management, programme management and joint operational or organisational project work (including business analysis), along with crime registry and audit functions. 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. During 2020 SBOS was called upon to create both a COVID19 police data hub and an Information Handling Hub. Both were designed to provide the best available data and insight to support the critical incident known as Op Response20.

- 3.27 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. SBOS also produces analysis in collaboration with external organisations and partners (including ambulance, fire and rescue service, county council, youth offending team, trading standards, etc.) in order to better understand performance in the context of shared demand. SBOS is also one of the founding partners of the Norfolk Office of Data Analytics (NODA), which went live at the end of 2019. NODA brings together local authority and police data to help inform 'whole system' analysis on high priority areas. NODA played a key role in data provision during the COVID19 pandemic, linking data from different county services to help build a picture of the situation in a dynamic and joined up way. NODA were also instrumental in supporting the identification of the most vulnerable through multiple partnership datasets, as well as working with the University of East Anglia on predicted forecasting of infection rates. NODA linked directly to the Strategic Coordination Group, providing insight into countywide data to help inform decision makers during this exceptional period. 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.

- 3.28 Norfolk and Suffolk Constabularies have Leadership Development Programmes for supervisors, middle and senior managers, both officers and staff. These are in the form of pathways for development, hosted and tracked on our learning management system. These pathways contain operational, personal and leadership development sessions and extensive and wide-ranging online content from the College of Policing and other organisations such as the Open University. The pathways use Performance Development Review (PDR) conversations throughout and weave in other development tools such as 360-degree feedback, reflective practice, the Insights Discovery profiling tool, a shadowing scheme and access to an internal pool of Mentors (including trained and/or qualified to ILM level 5). Within the mentor cadre there are a group officers and staff with a particular interest in supporting the development of officers and staff from underrepresented groups. Leadership apprenticeships are offered for police staff to replicate the qualifications offered to officers via the NPPF. Coaching skills for all managers and reverse mentoring is also part of our strategy to develop a coaching culture of leadership in the Constabularies.
- 3.29 In Norfolk, the SPIRIT (Supportive, Professional, Integrity, Respect, Impartial, Transparent) behavioural model has been launched and in Suffolk the Leading with CARE (Connectivity, Accountability, Risk Competence, Energy) leadership behaviours model has been launched. Both reflect the Code of Ethics and the Competency and Values Framework.
- 3.30 The Constabularies have re-designed the PDR process to include the opportunity for all staff and officers to have career conversation with their manager and build a plan for development and where appropriate progression. The PDR follows the College of Policing PDR principles. The PDR process continues to be improved and practice is supported with PDR conversation workshops available to all managers via the leadership pathways and their teams on request. Work is underway for an electronic PDR system and an IT specification has been developed. Both the existing ERP HR

system and the Learning Management System are being explored for suitability. In terms of Governance, a PDR project Board and PDR working group are operating with the aim of developing, standardising and monitoring the effectiveness of PDR. Board representatives also participate in the College of Policing PDR project, this has led to newly published national PDR principles that are aligned to our own forces ambition to improve PDR effectiveness.

- 3.31 The Learning Management System- “The Best I Can Be” continues to expand with an increasing amount of operational, personal and leadership content hosted on it. Covid has accelerated both the development of and engagement with the LMS products and its use has been promoted across the constabularies. The design of the learning material has also changed significantly with interactive, multimedia packages, guided tracked pathways and an automated booking function for workshops. The LMS has been used for student officers across both forces to carry out pre-learn packages and to enhance classroom teaching, for PST training, interviewing skills and valuing difference packages to provide some examples. Flexible blended learning approaches have become the core methodology with classroom time and travel reduced and providing 24/7, remote access to learning programmes in the workplace.
- 3.32 An apprenticeship strategy, policy and processes has been developed to align with the Constabularies’ People Strategy and is operating well across both forces to provide training for officers and staff in emerging, hard to recruit or retain skills and to upskill our staff for 21 Century Policing.

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

- 3.32 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.
- 3.33 The Crime Registry and Audit functions for Suffolk and Norfolk, which are part of SBOS, carries out independent and rigorous audit of crime and incident recording. It provides an objective assessment of how the Constabularies are complying with the National Crime and Incident Recording Standards. The audit reports produced are reviewed by Chief Officers and if areas for improvement are identified, action is allocated and taken accordingly. As necessary, any areas of risk in relation to Crime Data Integrity are also raised at the Force Crime Data Integrity meetings and, where relevant, at Force performance meetings. They are also detailed on the risk register.
- 3.34 As noted in previous Annual Governance Statements, Norfolk and Suffolk Constabularies have implemented a single IT system which joins up four key areas of the business; Intelligence, Investigation, Case and Custody as part of a nine-force consortium. The Norfolk/Suffolk Athena development plan has been implemented and is now business as usual, making efficient use of the application. Further collaborative opportunities are being reviewed which are continuing to explored increasing efficiencies with crime recording and quality assurance of investigations. This includes increased

desk-based investigations where appropriate. Both forces intend to explore collaborative opportunities with other Athena forces to streamline back office functions.

- 3.35 The accuracy of crime recording had been identified as requiring improvement by HMICFRS. Whilst the inspectorate identified outstanding leadership in this area of business, they found that staff did not understand the increasingly complex crime recording rules, which had at the time led to an estimated underreporting of 8700 crimes a year. Bespoke action plans have been in place and are improving the quality of crime recording. This work is overseen by a Crime Data Integrity meeting, Chaired by the Assistant Chief Constable. An early action was the retraining of all supervisors and Athena champions in understanding of Crime Data Integrity (CDI). Precept funding was used to recruit a Crime Data Integrity Quality Assurance Team (CDIQAT) team to ensure all incidents are correctly recorded on notification to police, as they come to the control room. This team has now been established for approximately one year and is seen as a centre for advice and guidance for officers as well as its primary function of quality audit for the first stage of the Constabulary's crime recording.
- 3.36 The Constabulary has now recruited three extra staff to support the existing team of three who are responsible for maintaining Athena data quality standards. These resources ensure compliance with Management Of Police Information (MOPI) and other relevant legislation. This task has been assisted by the development of software which automates much of the cleansing process. Beyond Athena, a data quality group has been established, operating across Norfolk and Suffolk, to oversee effort to improve the creation and management of all data. This group is Chaired by an Assistant Chief Constable and also oversees the work of an active Steering Group, with participants from all suitable business areas.
- 3.37 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 Constables 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 the Strategic Athena Management Boards.
- 3.38 Key areas of focus in relation to Athena have included:
- achieving implementation and establishment of the application across all nine forces; thereby moving the focus to a service maintenance and development structure
 - the delivery of refresher training to all supervisors and Athena champions; this including technical use of the system in conjunction with legislative updates and CDI compliance
 - the management of system performance, which is achieved through the aforementioned governance structures
 - the agreed plan to move all nine forces onto an automated update between Athena and Police National Computer has now been completed
 - improving data quality (regular monthly audits are undertaken to identify any issues and ensure crime data integrity, reporting into Chief Officers)
 - the replacement of the current management information system (MI) providing a stable ability to access, query and extract management information has now taken place
 - establishing a road map of changes and improvements to the Athena application
 - conclusion of the organisational review which led to a restructure, now established as business as usual with further efficiencies and DQ improvements being made.

- 3.39 Even with the additional flexibility available to the PCC for precept increases in 2020/21 and 2021/22; over the medium term, efficiencies will continue to be identified so that operational demand and cost pressures can be met. By the 31 March 2021 some £36m of annually recurring savings will have been found. Over the MTFP period to 2024/25 a further £4m has been identified. The financial envelope for 2021/22 will be affected by the Covid-19 pandemic and beyond will be determined by the Spending Review in late 2021. The additional 'flexibility' on precept for 2021/22, an increase of £14.94 per annum at Band D equivalent, will enable investment in improving key services for the communities of Norfolk. Reserves are forecast to reduce from £20.08m at 31 March 2021 to £14.63m, by 31 March 2025.

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

- 3.40 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.
- 3.41 The OPCC has continued to receive an annual award for meeting its statutory requirements on openness and transparency. The OPCC Transparency Quality Mark is issued by CoPaCC and assesses compliance with the Specified Information Order for Elected Local Policing Bodies. The OPCCN received a 'highly commended' award for the first time in 2020-21.
- 3.42 The Audit Committee has overseen the full programme of internal and external audit activity. See paras 4.21 to 4.23.

4. Review of Effectiveness

- 4.1 The PCC and Chief Constable have responsibility for conducting an annual review of the effectiveness of the governance framework, including the system of internal control.
- 4.2 This review of effectiveness is informed by
- the work of executive managers within the Constabulary and the OPCC who have the responsibility for the development and maintenance of the governance environment,
 - the head of internal audit's annual report and
 - comments made by the external auditor and other review agencies and inspectorates.
- 4.3 A full report will be presented to the Audit Committee ahead of the sign off of the accounts. The groups and processes that have been involved in maintaining and reviewing the effectiveness of internal control include the following:

Corporate Governance Working Group

- 4.4 This Group has been established to review the corporate governance framework and systems of internal control and to oversee the preparation of this Annual Governance Statement. The group comprises the Chief Executive of the PCC, the Director (Performance and Scrutiny) OPCC, the PCC's CFO, the Chief Constable's Assistant Chief Officer, the Head of Strategic Business and Operational Services and one co-opted member of the Audit Committee. These officers are involved in the oversight of

the governance framework and its processes and are in a position to review its effectiveness.

Internal Audit

- 4.5 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. The contract with TIAA will end on 30 June 2021 when as a result of a 7 Force procurement tender exercise RSM have been appointed as internal auditors from 1st July 2021.
- 4.6 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.
- 4.7 Internal audit is required to give an overall opinion on the adequacy and effectiveness of the framework of the internal control and risk management environment.
- 4.8 The overall opinion for 2020/21 from the Head of Internal Audit was:
- “TIAA is satisfied that, for the areas reviewed during the year, for the Police and Crime Commissioners for Norfolk and Chief Constable of Norfolk Constabulary has reasonable and effective risk management, control and governance processes are in place.
- This opinion is based solely on the matters that came to the attention of TIAA during the course of the internal audit reviews carried out during the year and is not an opinion on all elements of the risk management, control and governance processes or the ongoing financial viability or your ability to meet financial obligations which must be obtained by the Police and Crime Commissioner for Norfolk and Chief Constable of Norfolk Constabulary from its various sources of assurance.”
- 4.9 Out of twenty-three audits; three had limited assurance, fourteen reasonable, and six substantial assurance. More information on three 'Limited Assurance' audits is set out in paragraphs 5.1 and 5.2.

External Audit and Other External Review Bodies

- 4.11 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 2019/20 Statement of Accounts in November 2020 together with an unqualified value for money conclusion. The External Auditor's Annual Audit Letter was issued in November 2020 and it did not identify any matters to be addressed.
- 4.12 The Constabulary is subject to continuous review by Her Majesty's Inspector of Constabulary and Fire & Rescue Services (HMICFRS) (inspections have now recommenced after suspension as a result of Covid-19). There have been a number of

national thematic inspections carried out over the period. Reports relating to Norfolk can be found on the HMICFRS website: -

<https://www.justiceinspectors.gov.uk/hmicfrs/?force=norfolk&type=publications>

- 4.13 As part of the yearly inspection programme the HMICFRS also undertook a PEEL inspection, the inspection framework has now evolved from previous years into an Integrated PEEL Assessment (IPA) which comprises of three elements:
1. PEEL inspections
 2. Force Management Statements (FMS)
 3. Force Monitoring
- 4.14 With regard to PEEL inspections, these were amalgamated into one inspection and one report rather than twice per year. The latest PEEL inspection was published in May 2019 and the overarching question sets are set out below:
- Effectiveness – How effectively does the force reduce crime and keep people safe?
 - Efficiency – How efficiently does the force operate and how sustainable are its services to the public?
 - Legitimacy – How legitimately does the force treat the public and its workforce?
- 4.15 The force achieved ‘Good’ for Effectiveness, ‘Outstanding’ for Efficiency and ‘Good’ for Legitimacy. The force was congratulated on how it keeps people safe and reduces crime. HMICFRS also commended Norfolk Constabulary for the progress it has made over the period and was confident it was well-equipped for its strong performance to continue.
- 4.16 Force Management Statements are a self-assessment that Chief Constables prepare and give to HMICFRS each year. It is a statement and explanation of:
- o The demand the force expects to face in the next four years
 - o How the force will change and improve its workforce and other assets to cope with that demand
 - o How the force will improve its efficiency to make sure the gap between future demand and future capability is as small as it can reasonably be; and
 - o The money the force expects to have to do all this
- 4.17 HMICFRS have announced a revised inspection framework for the 2021 PEEL Inspection, and it is not anticipated that the force will be assessed using the current criteria. The revised inspection criteria include a Victim Service Assessment (VSA) which predominately looks at quality of service provided to victims from point of contact to outcome. The current PEEL themes of Effectiveness, Efficiency and Legitimacy will be assessed as woven through the VSA. The current Areas for Improvement (AFI) assigned to the force will also be reviewed during this 2021 inspection. The HMICFRS have also announced an addition to the four tier assessment grading used at present. The grading of “Adequate” creates a fifth tier and will be positioned between Requires Improvement and Good.
- 4.18 Regarding data protection, data breaches continue to be reported to the relevant areas. Each one is investigated, and appropriate action is taken to contain and manage the risk. The Deputy Chief Constables (Senior Information Risk Officers (SIRO)) are involved in the high-risk data breaches that are considered for referral to the Information Commissioners Office. Norfolk and Suffolk Constabularies made 10 referrals (6 Norfolk, 4 Suffolk) in financial year 20/21 (compared to 5 in the previous year). None of these

have resulted in formal action from the ICO (2 are currently still outstanding). However, procedure changes were implemented in light of 4 of these instances. Words of advice and further training in data protection is provided as a consequence of every breach. The Chief Executive of the OPCCN is the Data Controller and manages data breaches of which there have been none during 2020-21.

- 4.19 An internal audit took place in March 2020 for the OPCCN in the areas of Information Management and Information Security, the OPCCN received substantial assurance for its activity in this area.

Police and Crime Panel

- 4.20 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.

Audit Committee

- 4.21 The members of the Audit Committee are entirely independent people recruited for their scrutiny skills. They have no conflicts of interest and provide objective advice on audit and wider governance issues. The Committee provides advice, to the PCC and Chief Constable, on audit and governance issues and champions both audit and the embedding of risk management. Specifically, it receives and scrutinises the review of the system of internal control, and agrees and monitors any action plans resulting from those reviews. The Committee regularly reviews its own performance and prepares an annual report for submission to the PCC and Chief Constable.
- 4.22 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.
- 4.23 Committee members have continued to receive briefings and training through the year.

5. Significant Governance Issues

- 5.1 In 2020/21, three audits (of the 23 providing an overall assurance opinion) have received 'Limited Assurance':
- Seized monies
 - Data Quality
 - MOPI
- 5.2 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) that is chaired by the Deputy Chief Constable. The recommendations from the above limited assurance audits will be included in these follow up process.

Impact of Covid 19

- 5.4 As a result of the Covid-19 pandemic the Constabulary established a dedicated command model to focus on our response to the disease. This command structure was set up in collaboration with Suffolk Constabulary and enables a consistent approach to

our activity both in each force and across the extensive “joint” collaborated services. This structure operates a Gold-Silver-Bronze model with Gold Command operating across both forces, and a Silver Commander nominated in each force. A Strategic Gold plan has been written which is implemented by the Silvers at an operational, tactical level. Current work is underway to review the existing structure and reduce it to align with the reducing infection rate and a move to increased alignment with business as usual activity. The retention of the Gold and Silver commanders will ensure oversight of the local and national position and will ensure a mechanism to facilitate the dissemination of information across both organisations from Op Talla (the national policing response) and other Government departments.

- 5.5 The Constabulary governance model has remained in place throughout the whole year, allowing the Chief Constable and his Chief Officers to continue to run the force and hold officers and staff to account through different meeting structures. This was done in conjunction with Suffolk Constabulary and through use of virtual meetings has allowed appropriate governance arrangements to be delivered as close to normal as possible across the collaborated functions as well as in Norfolk only functions. In short, the Joint Chief Officer Team (JCOT), Joint Organisational Board, Joint Strategic Planning and Monitoring meetings all took place as planned. In addition, Norfolk Command Team met regularly with all meetings mentioned being held virtually via video enabled Skype / Microsoft Teams. Since the end of July there has been a mixed approach with some attendance in physical meeting rooms, with other attendees working from home and attending virtually. This is likely to be a model that continues for an extended period of time to maintain social distancing and also as new ways of working are reviewed.
- 5.6 The OPCCN established a strategic model to focus specifically on the response to the disease and ensured that the PCC could continue to maintain effective governance to fulfil the statutory role and support the wider sector through commissioning of services.
- 5.7 The strategy has been revised since March 2020 and confirms how the core functions of the Office of the Police and Crime Commissioner (OPCC) are able to be maintained and, in some cases, developed, to continue to perform effectively in a variety of situations. This has now been adopted as the new workstyle and will be under regular review to help support staff and deliver efficiently and effectively. The senior management team are in regular contact and the Chief Executive and other members of staff have appointments with the PCC by video enabled Skype/MS Teams on a consistent basis. Virtual governance practices have been put in place so that the PCC is still able to hold the Chief Constable to account as normal. The Police and Crime Panel also was able to meet virtually so still able to hold the PCC to account.
- 5.8 During this year and throughout the Coronavirus pandemic, the OPCCN has worked with statutory and non-statutory (third sector/charity) organisations to address the additional needs required for victims of crime and those organisations who are supporting them. It became very clear during this period that the delivery of services, including specialist services have had to be changed to incorporate a whole new operating model. To this end the OPCCN has proactively, sought, bid for and were successful with a variety of national funds to bring financial support to the county. This process is still ongoing with further funds being sought and applied for.

Fund	District	Value	Service/Status
Safer Streets Fund	Norwich City	£363,000	Secured - To target harden the most vulnerable wards against acquisitive crime
Safer Streets Fund – Round Two	Great Yarmouth	£78,837	Secured- To target harden the most vulnerable wards against acquisitive crime within the Gt Yarmouth District
Extraordinary Fund	All	£250,000	Secured - To support those services delivery to victims of domestic abuse and sexual violence
Extraordinary Fund – Round Two	All	£102,503	Secured - To support those services delivery to victims of domestic abuse and sexual violence
Sexual Violence Fund	All	£178,000	Secured - To support those with protected characteristics who have victim to serious sexual offences/rape
National Probation Service	Great Norwich	£35,000	Secured - To support prison leavers who continually revolve around the Criminal Justice System
St Giles Trust	All	£45,078	Contribution to the WONDER+ Project
Public Health - Project ADDER	All	£10,000	Contribution to OPCCN Staffing Costs
Public Health - Project ADDER	All	£60,000	To support 'Pathway Out' Programme
Public Health Project ADDER – WONDER+	All	£67,250	Contribution to WONDER+ Project - Project Spend Commences 1st April 2021
Modern Slavery Fund	All	£3,000	To support work of the Modern Slavery Network
Home Office – Cumbria PCC	All	£127,755	To support work of Project ATOM – Enhanced digital forensic capability
Department of Works and Pensions	All	£35,000	To support 'Pathway Out' Programme
TOTAL SECURED			£1,355,423

Crime Recording

- 5.9 As outlined in the main body of the report the accuracy of crime recording had been identified as requiring improvement by HMICFRS. Paragraphs 3.35 and 3.36 outline the positive action that has been taken to address these issues including the establishment of the new Crime Data Integrity meeting chaired by the ACC, the establishment of the new Crime Data Integrity Quality Assurance Team (CDIQAT) that has been place for over a year, and further investment in additional resources. This approach has seen significant improvement in compliance ahead of any further assessment by HMICFRS.

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

Police and Crime Commissioner for Norfolk

Chief Constable of Norfolk

Mark Stokes
Chief Executive
Office of the Police and Crime Commissioner

Jill Penn CPFA
Chief Finance Officer
Office of the Police and Crime Commissioner

Peter Jasper
Assistant Chief Officer
Constabulary Chief Finance Officer

Date:

Signed on behalf of the senior staff of the Police and Crime Commissioner for Norfolk and on behalf of the Chief Officers of Norfolk Constabulary.