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# **Nottinghamshire Police Annual Governance Statement 2015/16**

## Table of contents

|            |  |           |
|------------|--|-----------|
| <b>1.0</b> | <b>Introduction</b> .....  | <b>3</b>  |
| <b>1.1</b> | <b>Scope of responsibility</b> .....   | <b>3</b>  |
| <b>1.2</b> | <b>The purpose of the governance framework</b> .....   | <b>3</b>  |
| <b>2.0</b> | <b>The governance framework</b> .....  | <b>3</b>  |
| <b>2.1</b> | <b>Principle 1: Focusing on the purpose of the Force, outcomes for the community and creating and implementing a vision for the local area</b> ....                | <b>3</b>  |
| 2.1.1      | The Police and Crime Plan.....   | 3         |
| 2.1.2      | Strategic Policing Requirement .....   | 3         |
| 2.1.3      | Delivery and monitoring.....   | 4         |
| <b>2.2</b> | <b>Principle 2: Leaders, officers and partners working together to achieve a common purpose with clearly defined functions and roles</b> .....                     | <b>4</b>  |
| 2.2.1      | Police Reform and Social Responsibility Act 2011 (PRSR) .....  | 4         |
| 2.2.2      | The Policing Protocol .....  | 4         |
| 2.2.3      | Scheme of Good Corporate Governance and Working Together.....  | 4         |
| 2.2.4      | The role of the Chief Financial Officer .....  | 6         |
| 2.2.5      | Partnership working.....   | 6         |
| 2.2.6      | Collaborative working .....  | 7         |
| <b>2.3</b> | <b>Principle 3: Promoting values for the Force and demonstrating the values of good governance through upholding high standards of conduct and behaviour</b> ..... | <b>8</b>  |
| 2.3.1      | Our Values and the Code of Ethics .....  | 8         |
| 2.3.2      | Monitoring standards.....  | 9         |
| 2.3.3      | Information assurance.....   | 10        |
| <b>2.4</b> | <b>Principle 4: Taking informed and transparent decisions which are subject to effective scrutiny and managing risk</b> .....                                      | <b>12</b> |
| 2.4.1      | Decision making .....  | 12        |
| 2.4.2      | Joint Audit and Scrutiny Panel.....  | 13        |
| 2.4.3      | Risk management .....  | 13        |
| 2.4.4      | Audit and inspection .....   | 14        |
| 2.4.5      | Managing legislative change .....  | 14        |
| <b>2.5</b> | <b>Principle 5: Developing the capacity and capability of the Force to be effective</b> .....  | <b>14</b> |
| 2.5.1      | Delivering the Future (DtF) .....  | 14        |
| 2.5.2      | Induction .....  | 15        |
| 2.5.3      | Training .....   | 15        |
| 2.5.4      | Career pathways.....   | 16        |
| 2.5.5      | Succession planning .....  | 16        |
| <b>2.6</b> | <b>Principle 6: Engaging with local people and other stakeholders to ensure robust public accountability</b> .....   | <b>16</b> |
| 2.6.1      | Community engagement and consultation.....   | 16        |
| 2.6.2      | Workforce engagement and consultation .....  | 18        |
| <b>3.0</b> | <b>Review of effectiveness</b> .....   | <b>18</b> |
| <b>4.0</b> | <b>Improvement actions</b> .....   | <b>18</b> |
|            | <b>Appendix A: Identified improvement actions from 2015/16</b> .....   | <b>20</b> |
|            | <b>Appendix B: Update of improvement actions from 2014/15</b> .....  | <b>22</b> |

## **1.0 Introduction**

### **1.1 Scope of responsibility**

Nottinghamshire Police is responsible for ensuring that its 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. The Force has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised.

In discharging this overall responsibility, Nottinghamshire Police is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and which includes arrangements for the management of risk.

The Chief Constable of Nottinghamshire Police and the Police and Crime Commissioner (PCC) for Nottinghamshire have adopted a Joint Code of Corporate Governance, which is consistent with the principles of the CIPFA/ SOLACE Framework 'Delivering Good Governance in Local Government'. A copy of the Code of Governance can be obtained from the Nottinghamshire Office of Police and Crime Commissioner (NOPCC) website at <http://www.nottinghamshire.pcc.police.uk>.

This Statement explains how the Force has complied with the Code and also meets the requirements of Accounts and Audit (England) Regulations 2011, regulation 4(3), which requires all relevant bodies to prepare an annual governance statement.

### **1.2 The purpose of the governance framework**

The governance framework comprises the systems and processes, culture and values by which the Force is directed and controlled and the activities through which, it accounts to and engages with the community. It enables the Force to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.

## **2.0 The governance framework**

The principles which form the basis of the governance framework and how they are applied within the Force are described in the following sections.

### **2.1 Principle 1: Focusing on the purpose of the Force, and on outcomes for the community, and creating and implementing a vision for the local area**

#### **2.1.1 The Police and Crime Plan**

The local direction and priorities for the Force are set in the Police and Crime Commissioner's (PCC's) Police and Crime Plan, which was created following a comprehensive multi-agency strategic assessment. The Force and local partner organisations each completed a Local Profile assessment. Local Profiles were aggregated together with outcomes of community consultation and engagement, to inform the Police and Crime Needs Assessment (PCNA) and subsequently the refresh of the Police and Crime Plan.

The PCC has provided a commitment to the public to deliver safer communities; improved trust and confidence in policing and value for money policing services.

#### **2.1.2 Strategic Policing Requirement**

At a national level, the Force work to the Strategic Policing Requirement (SPR) which is issued by the Home Office to articulate current national threats and the appropriate

national policing capabilities required to counter those threats. The SPR is considered as part of the Force Strategic Crime Intelligence Assessment which in turn informs the PCNA and the Police and Crime Plan.

### **2.1.3 Delivery and monitoring**

The monthly Performance and Insight Pack (P&I Pack) reports against the strategic priority themes set out in the Police and Crime Plan. This considers performance against target as well as trends over time. Additional insight is also given for those areas of performance which are of concern to the Force.

The P&I Pack is reported to the Force Executive Board (FEB) and the Force Performance Board on a monthly basis. It is also presented to the NOPCC's Strategic Resources and Performance Meeting to inform them of the key performance headlines. The minutes of this meeting, along with the P&I Pack, are made available on the NOPCC website so they are accessible to members of the public.

A review of the Force's approach to performance management was commissioned during 2015/16 to focus on the commission, production, circulation and consumption of performance management information. The review will also examine the types of performance decisions that are made across the organisation. Additionally, and in order to deliver a performance framework that aligned to future changes, there are opportunities to link in with and help shape regional developments in performance management. This review is still on-going.

## **2.2 Principle 2: Leaders, officers and partners working together to achieve a common purpose with clearly defined functions and roles**

### **2.2.1 Police Reform and Social Responsibility Act 2011 (PRSR)**

Each PCC and their respective Chief Constable is established in law as a corporation sole within the PRSR 2011 Act. As such, both are enabled by law to employ staff and hold funds in their official capacity. Chief Constables are changed with the impartial direction and control of all constables and staff within the police force that they lead.

### **2.2.2 The Policing Protocol**

The Force is compliant with the Policing Protocol, which was issued in accordance with the Police Reform and Social Responsibility Act 2011 and sets out how the functions of the PCC, Chief Constable and Police and Crime Panel will be exercised in relation to each other.

### **2.2.3 Scheme of Good Corporate Governance and Working Together**

The NOPCC and Force operate under a comprehensive 'Working Together Agreement' which comprises of the scheme of consent, the Joint Code of Corporate Governance, Financial Regulations and Contract Standing Orders. The document was introduced in 2014 to give clarity to the way the NOPCC and the Force will govern both jointly and separately to ensure that they are conducting business in the right way, for the right reason at the right time.

#### **Scheme of Consent**

The Scheme of Consent sets out the extent of, and any conditions attached to, the PCC's consent to the Chief Constable and their respective staff. It outlines the Chief Constable's functions and powers and any statutory restrictions on the powers and conditions of consent from the PCC.

## DRAFT

The Force's internal auditors, Mazars, undertook a review of the Force's Core Financials during 2015/16. It was identified that the current Scheme of Delegation does not reflect the purchasing embedded within the Multi Force Shared Services (MFSS) process and therefore there is a risk that spending is not authorised and controlled in line with Financial Regulations. A recommendation was made to for the NOPCC, the Force and MFSS to establish how the current authorisation limits, as agreed within the scheme of delegation, can be embedded into the current purchasing process. This is highlighted as an action for improvement during 2016/17.

Mazars also identified lack of up to date guidance for staff with regard to expenses, which may lead to inappropriate or invalid claims being made. The Force's Expenses Policy will be reviewed and updated during 2016/17 to ensure it is fit for purpose and includes clear guidance on all categories of expenses and consequences for staff who breach the policy. The policy will be reissued via Weekly Orders to all staff and officers to ensure awareness and compliance.

### **Joint Code of Corporate Governance**

The Joint Code of Corporate Governance (the Code) has been developed by the PCC and the Chief Constable using the six principles of Good Corporate Governance as the framework for setting out local arrangements to deliver the 'Delivering Good Governance in Local Government' framework.

The Force's internal auditors reviewed the Code in 2015 and found that it is fully embedded within the governance framework and supports the focus and direction of both corporations sole. However, it was identified that the PCC's 'Governance and Decision Making Framework', which was last reviewed in November 2012, is not up to date and that it conflicts with the 'Working Together' document. This may lead to decisions not being made in line with current guidance and expectations and not subject to the correct approval and accountability process.

It was recommended that the NOPCC should undertake a review of the Governance and Decision Making Framework to ensure it remains up to date and fit for purpose in terms of the way decision are required to be made. This applies particularly to those with non-financial impact, or of significant public interest, which are not currently covered in the Working Together Document. This action will be progressed under the Governance Workstream of the Strategic Alliance.

### **Financial Regulations**

The Force's Financial Regulations are designed to establish overarching financial responsibilities, to confer duties, rights and powers upon the PCC, the Chief Constable and their statutory officers and to provide clarity about the financial accountabilities of groups or individuals. They apply to every member and officer of the service and anyone acting on their behalf.

### **Contract standing orders**

Procurement at a local level is carried out in line with the Contract Procedure Rules and Standing Orders. The document updates the previous standing orders and reflects how the East Midlands Strategic Commercial Unit (EMSCU) manage strategic procurement across partner forces. The Orders set out the Business Code of Conduct for the NOPCC and the Force to advise on the minimum standards expected of all staff to ensure fairness and consistency of approach in line with sound commercial practice.

During an audit of procurement activity in 2015/16 Mazars identified some areas in the control environment where there is scope for improvement.

## DRAFT

- The Force should consistently ensure that contracts are in place for all purchases over £25000 and these should be signed prior to commencement of the contract.
- A formal approval process should be established within the Force before new suppliers are entered onto the Oracle system.
- Management should look to implement an exception reporting system in conjunction with the MFSS to monitor payments which are outside of the approved process.

These actions are being robustly managed and reported to the FEB on a quarterly basis.

### **2.2.4 The role of the Chief Financial Officer**

The role of Chief Financial Officer (CFO) is fulfilled by the Assistant Chief Officer for Finance and Resources for Nottinghamshire, Northamptonshire and Leicestershire.

As a key member of the leadership team, the CFO helps to develop and implement strategy and resource, and deliver the PCC's strategic objectives sustainably and in the public interest. They are actively involved in and able to bring influence to bear on, all business decisions to ensure immediate and longer term implications, opportunities and risks are fully considered, and aligned with the financial strategy. They lead and encourage the promotion and delivery of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively.

### **2.2.5 Partnership working**

The Force is committed to working in partnership to deliver its priorities. By working with other organisations and agencies the Force can provide the very best service to its communities. It is essential that working in partnership with others is underpinned by a common vision that is understood and agreed by all parties.

#### **City partnerships**

There are strong governance processes in place for the City partnerships. Each of the partnerships under the One Nottingham umbrella, including the Crime Drugs Partnership (CDP), have clear terms of reference including a clearly defined purpose, arrangements for information sharing, community engagement and governance and finance.

The CDP Plan 2015-20 sets out the overall aims and delivery and performance framework of the partnership to deliver the 'safer' agenda of the 'Nottingham Plan to 2020'. The Partnership Plan has been developed with regard to the priorities of the Police and Crime Commissioner. It is informed by an annual assessment of threat, risk, harm, volume and response, which identified priorities for the City.

There is a robust governance framework in place to oversee the delivery of the Plan. This is directed by the Partnership Board, which provides strategic governance of the partnership. There is also a Citywide Priority Tasking Group, which provides leadership in operational matters and Themed Strategic Groups and Task and Finish Groups, which coordinate action at an operational level. Neighbourhood Action Teams coordinate action with a strong focus on high impact neighbourhoods.

The Partnerships Support Team have a clear remit to build and manage strategic and tactical plans, monitor performance, identify risks and provide coordination between agencies.

#### **County partnerships**

There is robust governance in place to manage County partnership working. The strategic partnerships to which the Division belongs are underpinned by a common

## DRAFT

vision and objectives, which are outlined in terms of reference for the Safer Nottinghamshire Board (SNB).

The SNB is responsible for setting strategic direction for community safety and substance misuse. The Board ensures the effective delivery of the Nottinghamshire Community Safety Strategy, supports the statutory local Community Safety Partnerships (CSPs) to deliver their community safety strategies and ensures effective performance management arrangements are in place.

The four statutory CSPs are responsible for the delivery of local community safety strategies and action plans. The SNB Delivery Groups support the SNB and CSPs to implement the community safety strategies.

Each of the three CSPs in the County produce performance information on a monthly basis. This includes reporting on current performance against targets, comparison against most similar force peers and performance of Partnership Plus areas. The SNB Performance Group brings together the CSP Chairs to discuss performance risks and highlights.

Performance is managed through a process of Strategic Assessment which highlights the business areas that need addressing. Problem profiles support a greater understanding of established and emerging crime or incident series, priority locations and other identified high risk issues in an area. Action plans are developed from this process to help deliver measurable outcomes for local communities.

### **2.2.6 Collaborative working**

Collaborative opportunities are increasingly being explored and arrangements put in place within the East Midlands region in order to maintain and improve service delivery whilst continuing to deliver significant cost savings.

The Collaboration Programme has established a governance structure to support the development of collaboration. This includes the East Midlands Police and Crime Commissioners Board (EMPCCB), which meets every two months and is attended by the regional PCCs, their Chief Executives and Finance Officers and the Chief Constables. The Board is constituted as a business meeting to coordinate strategic oversight and performance management of strategic assets. Members receive updates on collaborative projects, performance, threat and risk assessment and collaboration budgets. This is supported by the PCC and CEO Business Meeting, attended by the CEOs and PCCs and the Collaboration Efficiency Board.

In September 2015 the EMPCCB agreed to nominate a lead Police and Crime Commissioner for each area of regional collaboration to provide further scrutiny and assurance across that specific area. It was proposed that each head of each service would provide access to all appropriate strategic, tactical and performance information including finance reports and budgets to provide the level of assurance necessary to enable appropriate support and challenge through the PCC Board.

Building on the success of existing regional collaborations such as EMOpSS, EMCJS, Legal Services and EMSOU, a Strategic Alliance is now being pursued between Leicestershire, Northamptonshire and Nottinghamshire to explore the potential of further collaboration, to share resources and better protect the public.

Clear roles, responsibilities and meeting structures have been established to ensure robust governance arrangements as the Strategic Alliance is developed. The three DCCs and PCC Chief Executives have been given lead responsibility for developing a detailed design for each of the proposed portfolios within the Strategic Alliance.

## DRAFT

A Design Authority meeting is held every two weeks, chaired by the Leicestershire DCC, this meeting brings together the three DCCs, three Chief Executives and the Programme Director. The Strategic Alliance Board meeting is held monthly, and allows the three Chief Constables and three Police and Crime Commissioners to hear the latest programme developments and make key decisions, based on recommendations from the Design Authority.

Each of the established collaborations has a Collaboration Agreement in place in line with Section 22a of the Police Act 1996 which outlines arrangements between two or more forces when working in collaboration. This includes the aims of the collaboration, the governance and accountability framework, roles and responsibilities, financial contributions, audit and inspection and information management arrangements. The Agreements are formally signed off by the PCCs and Chief Constables for the forces concerned and are continually reviewed and amended by the East Midlands Police Legal Services (EMPLS) to ensure they are fit for purpose.

### **2.3 Principle 3: Promoting values for the Force and demonstrating the values of good governance through upholding high standards of conduct and behaviour**

#### **2.3.1 Our Values and the Code of Ethics**

The PROUD Value campaign, which was launched in 2012, included a full communications plan, personal briefings to teams by managers and incorporation of PROUD values in promotion processes.

When the Code of Ethics was introduced in July 2014, the Force explicitly linked it to the PROUD values. An email was sent to all officers and staff from the DCC informing them of the Code of Ethics, with links to the video and information from the College of Policing.

A clear structure of responsibility was established for embedding the Code by appointing strategic, operational and tactical leads.

The plan for the initial phase of embedding the Code was informed by national best practice from the College of Policing, as well as links with regional forces. It included briefings to senior managers and the NOPCC, communications on the intranet page and identification of business area champions across the organisation. The approach focused upon making staff aware of the Code of Ethics and how to use it, it was not a process based approach of a 'standing item' on policy documents and operational orders.

In 2015, the Force moved to the next phase of embedding the Code. This included a review of best practice from other forces. The next stage of communications, involving ethical dilemmas on the force intranet was started in March 2015. This included a weekly dilemma to encourage staff to consider and apply the Code of Ethics to.

The force Professional Standards and Integrity Board was amended to a 'Professional Standards, Integrity and Ethics Board'. The first ethical issue considered at this board was the offer of free bus travel to officers by local bus companies.

The Code of Ethics sits at the centre of the National Decision Model, so is explicitly referenced and considered in any decision making situation. It is emphasised during training such as Officer Safety Training, where decision making about use of force is



covered. It is clearly set out in the policy booklets used by officers in command situations. It is also applied to personnel processes, policies and explicitly included in areas of work such as dealing with grievances.

### **2.3.2 Monitoring standards**

#### **Conduct and behaviour**

Standards of conduct and personal behaviour required of all officers and staff are embedded in the Police Conduct Regulations, 2012, and the Police Staff Misconduct Policy and Procedure.

Standards are governed by the Professional Standards, Integrity and Ethics Board, which is chaired by the Deputy Chief Constable (DCC). The meeting's remit is to oversee integrity and monitor standards of behaviour and conduct within the Force, ensuring that they are in line with the Force values and have a positive impact on Force reputation and public confidence.

A report on IPCC investigations is presented at the NOPCC's Audit and Scrutiny Panel to inform the PCC on cases the Force has referred to the Independent Police Complaints Commission (IPCC). It also details any outcomes and recommendations the IPCC has referred back to the Force during this period, and other learning identified.

The 'early intervention process', which was introduced in 2014/15, has proved effective in enabling PSD to intercede as soon as possible where Officers or members of staff highlighted as being at particular risk of breaching conduct standards.

#### **Complaints**

There are robust mechanisms in place with respect to the governance of complaints in Force. Complaints are managed in accordance with statutory guidance provided by the IPCC. To provide internal assurance, a Performance and Insight Report, monitoring the complaints process, is produced on a monthly basis. This report provides statistical data and analysis on public complaints and allegations recorded by Division and Department, diversity monitoring of complainants and Officers and Staff receiving complaints, mode of resolution, timeliness and outcomes. The report is discussed in detail at the Professional Standards, Integrity and Ethics Board. All learning is captured and fed into a service improvement plan. Full detailed reports are also produced on a quarterly basis, which are a retrospective of the previous 12 months.

A monthly progress report is provided for Divisional and Departmental Heads detailing officers who are currently under suspension notices and restricted duties, outstanding local resolutions, employees subject to three or more complaints and stop and search complaint allegations.

The Force's AGS for 2014/15 highlighted a recommendation made by HMIC following the inspection of 'Police Integrity and Corruption', that the Force should 'review its capacity and capability to carry out proportionate investigations into public complaints to minimise delays'<sup>1</sup>. Assurance has been provided that resources within PSD are regularly reviewed and fixed term contracts used where necessary to manage workload; recent data from the Independent Police Complaints Commission (IPCC) shows that the Force is now in line with national averages.

During 2015/16 HMIC inspected the Force to ascertain 'how legitimate the Force are at keeping people safe and reducing crime'. The overall judgement was 'good' and it was found that the Force dealt with complaints and misconduct fairly and consistently

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<sup>1</sup> HMIC: Police Integrity and Corruption, November 2014, <http://www.justiceinspectorates.gov.uk/>

and investigations were free from bias. Furthermore the report stated that 'there were procedures in place which ensured consistent decision-making complaint investigations across officers and staff'.

### **Confidential reporting**

There are clear processes in place around confidential reporting. The Professional Standards Reporting Procedure sets out the ways in which individuals within the Force can report breaches of PSD in a supportive and confidential environment. The Procedure was reviewed and refreshed in 2014 to reflect the introduction of Integrity Messenger, the Force's online confidential reporting tool.

### **Local resolution**

Where appropriate, for less serious conduct issues, a process of local resolution may be used to address a complainants concerns quickly and effectively, without the need for formal investigation. A 'guide to locally resolving complaints against police or police staff' is provided by PSD. The IPCC target time for locally resolving complaints is 28 days from the date it was first recorded. The Force's performance is measured against this target and against other forces.

### **Conflicts of interest**

Force procedure regarding Business Interests and Additional Employment for Police Officers and Police Staff was revised during 2015/16 following HMIC's report 'Police Integrity and Corruption'. It was recommended that the Force should ensure that any secondary employment or business interest applications which have been declined or withdrawn are followed up on to ensure compliance. The Procedure has since been updated to ensure all refused interests are subject to review by line managers.

A redacted version of the Register of Approved Business Interests is published on the Force website annually; any changes are reported on a monthly basis to the Professional Standards, Integrity and Ethics Board.

The Notifiable Associations for Police Personnel Procedure was also reviewed during 2015/16. It identifies the procedures that should be followed should police personnel consider themselves the subject of, or suspect another member of staff to have, a notifiable association.

### **Integrity Health Check**

A new process was introduced in 2014/15 whereby staff and officers receive an annual Integrity Health Check alongside their Personal Development Review (PDR). It has been identified, however, that as PDRs have not been carried out consistently during 2015/16 Integrity Health Checks have also not been completed for all officers and staff. A new electronic PDR process has now been introduced which incorporates the Integrity Health Check. It is recommended that the completion of PDRs is reported to Divisional and Departmental Heads to ensure compliance with the Integrity Health Check process.

## **2.3.3 Information assurance**

### **Information management**

Information management is governed through the Force Information Assurance Board (FIAB), chaired by the DCC as the Senior Information Risk Officer (SIRO). The role of the Board is to manage the effectiveness of information management arrangements to ensure that information held, processed and accessed by members of the Force and stakeholders is managed in line with legislative requirements.

During 2014/15 HMIC conducted 'Building the Picture', an inspection of police information management. As part of a local response to the 'Building the Picture'

## DRAFT

recommendations, a new Information Management Strategy (IMS) was developed and published. The purpose of the IMS is to set out a roadmap for further developing information management capability and effectively embedding an information assurance culture across the Force in line with guidance and standards issued as part of Authorised Professional Practice.

Information management training is managed and commissioned regionally via the Regional Information Assurance Group (RIAG). Due to the prioritisation of Niche implementation during this time it was decided that the new Information management training package will be scheduled for completion later in 2016.

### **Information Asset Owners (IAOs)**

In 2014, the Force undertook an Information Asset Register Project. This project constituted of three stages, the first being engagement with identified IAOs in order to identify their information assets, their sensitivity/importance and through life management. Stage 2 constituted engagement with nominated Information Asset Delegates (IADs), who have day-to-day administrative responsibilities of each asset, in order to ensure correct protection and use of each asset.

The project has now entered Stage 3 'Continuous Improvement'. The sensitivity/importance of the identified information assets has been catalogued, allowing for closer scrutiny of each. This allows for the continual identification of Information Assurance improvements.

During the governance review it was identified that further training with IAOs is required during 2016/17 to ensure they fully understand their roles and responsibilities, including ownership of information risk and attendance at FIAB.

### **Data protection and 'Freedom of Information'**

Nottinghamshire Police as a public authority have a legal responsibility to respond to Freedom of Information Act (FOIA) and Data Protection Subject Access Requests (DP SARs) within legislative deadlines. An annual report is presented to the Audit and Scrutiny Panel to provide the Panel with data on legislative compliance with the FOIA and DP SARs. This data is also presented at the FIAB quarterly.

The Force has a number of Information Sharing Agreements (ISAs) in place with partners and other agencies. ISAs identify the statutory or common law basis for sharing personal information and the extent and nature of the personal information to be shared. They also set out common standards for the processing and handling of such information, including quality, retention and security considerations.

All ISAs are formally approved by the SIRO who holds the National Police Chief's Council (NPCC) Portfolio for Information Sharing. In order to ensure all ISAs are fit for purpose they were reviewed during 2015/16.

Records Management requirements are currently identified as an area for review under the Standards and Change programme for the Strategic Alliance. A Strategic Initiative Plan for Records Management has also been established under the umbrella of the Information Management Strategy. Each action is allocated ownership and the progress against actions is reported on quarterly at the FIAB.

### **Information security and assurance**

The Information Security Team ensures that the Force continues to meet the required security standards to allow it to connect to the Public Services Network for Policing (PSNP) in line with Codes of Connection. The team engages with the National Accreditors and maintains a current PSN certificate of accreditation.

The team liaises with the National Policing Information Risk Management Team (NPIRMT), based at the Home Office, on national initiatives and projects. They also attend the local Regional Information Assurance Board (RIAG), chaired by DCC Fish, for regional initiatives and projects and the Police Information Assurance Forum (PIAF), biannually.

### **Information risk**

An Information Risk Management Strategy was developed and published in 2015/16. The Strategy describes how the Force Risk Management Policy will be applied across all business areas, so that the management of risk becomes an integral part of the management of information assets. An Information Risk Register has been developed and risks are reported quarterly to FIAB.

It is acknowledged that the Information Risk Management process requires further development and this has been identified in an earlier action with the development of Corporate Risk Management.

## **2.4 Principle 4: Taking informed and transparent decisions which are subject to effective scrutiny and managing risk**

### **2.4.1 Decision making**

Corporate Development and Finance are jointly responsible for implementing mechanisms to ensure all appropriate considerations are made when making a key decision, for example when writing business cases, scopes, project initiation documents, policies, procedures and strategy.

Decision making is recorded as part of minutes, action plans and decision logs. Key decisions from the FEB are no longer published on the Force's intranet, it is recommended that this requirement is reviewed and addressed in 2016/17. Additionally it is a requirement of the ICO Publication Scheme that the Force publish how key decisions are made on the external website. This should take the form of minutes of key Force meetings, such as the FEB. This is not currently done and has also been identified as an area for improvement for 2016/17.

An internal review of the current Force meeting structure was commissioned following a Chief Officer Team restructure in 2015. The objective of the review is to streamline the current meeting structure to facilitate an efficient and effective decision making framework. Outcomes will also include up to date, concise terms of reference for each meeting, standardised templates for agendas and action and decision recording and clear meeting guidelines. This review is on-going.

### **Business planning**

The Force has made significant developments in the introduction and governance of new activity during 2015/16. The 'Activity Request' process has been developed to implement further control over the introduction of new activity, outside of business as usual. The objective of this process is to ensure prioritisation of available resource in supporting departments, including Finance, HR, Assets and IS, and full oversight of improvement activity taking place in Force. This process has omitted duplication of activity and appropriate allocation of resource for prioritised activity.

There has also been improved governance and oversight of efficiency savings with a more robust process for identification and subsequent monitoring of realisation. Senior Responsible Officers (SROs) are responsible for producing business case for the efficiency targets and how these will be achieved; it will then be validated by both Finance and HR. This process ensures that all costs are accounted for and staff savings are accurately identified and not double counted across departments.

Delivery of the savings programme and the achievement of efficiency targets are monitored and reported to the Transformation Board. To ensure comprehensive management overview of the DtF Programme and associated efficiency savings, a dashboard has been developed which will be presented at the Board on a monthly basis. This includes an update on workstreams, key risks and issues and individual updates from Finance, HR and Procurement. This tool will enable proportionate monitoring and achievement of savings for the forthcoming year.

#### **2.4.2 Joint Audit and Scrutiny Panel**

In accordance with the Financial Management Code of Practice for the police service, issued by the Home Office, the PCC and the Chief Constable established a Joint Audit and Scrutiny Panel (the Panel) in 2013. The role of the Panel is to advise the PCC and Chief Constable on the adequacy of the corporate governance and risk management arrangements in place and the associated control environment, advising according to good governance principles and proper practices.

The Panel also assist the PCC and the Chief Constable in fulfilling their responsibility for ensuring value for money and they oversee an annual programme of scrutiny of key areas of policing activity on behalf of the PCC.

The Panel meets four times a year and consists of five independent members. The terms of reference for the Panel, meeting agendas, minutes and associated reports are published on the NOPCC's website in the interests of transparency and accountability.

#### **The role of the Head of Internal Audit**

In compliance with CIPFA guidance, the NOPCC and the Force have appointed a Head of Internal Audit. This role is contracted out to Mazars, who are responsible for the organisation's internal audit service, on behalf of the CFO, including drawing up the internal audit strategy and annual plan and giving the internal annual audit opinion.

#### **2.4.3 Risk management**

The joint Risk Management Policy of the Force and the Office of the PCC has been in place since mid-2015. A Risk Management Process Guide has been produced alongside this to support managers in understanding how to apply the policy to the decision making process. Since the departure of the registered Risk Practitioner in July 2015, professional support and advice on corporate risk management has been provided to the Force and the NOPCC by the Planning and Policy Team within the Corporate Development department.

Whilst the current process satisfies the Force's risk management responsibilities it is not as effective or proactive as the agreed procedure was. It has been agreed with the DCC that the formal risk reviews process will be reintroduced and that that the process for identifying potential new risks would be further developed.

An Information Risk Management Strategy has been approved by the FIAB and is now being implemented by IAOs. Risk management strategies for other business portfolios and programmes are still in development. Risk management maturity within the Force remains relatively low, but is expected to improve as processes becomes embedded and experience in its use increases.

The Planning and Policy Team provides a quarterly report on strategic risk management to the FEB and the Audit and Scrutiny Panel. This includes a summary of current strategic risks and an overview of risk management activity during the reporting period.

## **2.4.4 Audit and inspection**

### **Internal audit**

The Force's risk based Internal Audit Plan (the Plan) for 2015/16 was agreed and presented to the Joint Audit and Scrutiny Panel (the Panel) in June 2015. The Plan was informed by the assurance mapping process which gives a dashboard view of assurance levels against functional areas and Force risks. Where an area is deemed to have limited assurance it will be recommended for inclusion in the Plan.

### **External audit**

In respect of external audit, progress reports are provided to the Panel by KPMG to provide a summary of the work they plan to undertake for the audit year, together with a high level assessment of the risks that have been considered as part of the initial planning process.

KPMG conduct an 'interim audit visit', which takes place in April, and a 'final accounts visit', which takes place in July. Communication is on-going with the Force Finance team throughout the year and feedback is provided to the Panel on any potential risk areas arising during the year.

### **Outcomes from audit and inspection**

An Audit and Inspection Report is presented to the FEB and the Panel on a quarterly basis to enable the Panel to fulfil its scrutiny obligations to oversee and consider Force arrangements to deliver against audit and inspection recommendations.

## **2.4.5 Managing legislative change**

EMCHRS L&D provide a monthly horizon scanning report for the East Midlands Region. 'Skyline' draws on a number of sources including West Yorkshire's 'On the Horizon', the IPCC 'Learning the Lessons Bulletin' and the 'College of Policing Digest'.

Any changes to finance legislation is monitored through professional network subscriptions, such as CIPFA. Potential changes are discussed by the Finance team and action taken as appropriate.

Planning and Policy have identified a requirement for improvement in the proactive identification of risk and opportunity arising from changes to legislation and national crime and justice policy. It is recommended a process is implemented to ensure robust oversight of horizon scanning outcomes and subsequent identification and assessment of risk and opportunity in consultation with the relevant lead officer.

## **2.5 Principle 5: Developing the capacity and capability of the Force to be effective**

### **2.5.1 Delivering the Future (DtF)**

The Capacity and Capability workstreams which were launched in 2015, they are key to the Force meeting its objectives under 'Principle 5' 'developing the capacity and capability of the Force to be effective'. The Capacity workstream will look to ensure that the Force understands the workforce as it is now and how it will be until 2020 and how to match resource to demand. It will explore our current systems and processes, allowing the Force to identify how to make them lean, yet effective, releasing capacity for the Force.

The workstream aims to review the Force's capacity, with a view to ensuring it can meet current and future demand, with the resources it has at its disposal. The Force needs to consistently review how it works and why (Check, Plan, Do), and by

## DRAFT

reviewing the processes and systems in place, the work stream will aim to provide recommendations to improve/increase Force capacity, thereby ensuring the Force continues to deliver an efficient and effective service to the public and the communities it serves.

The workstream has initiated a formal review process, based on an annual continuous review cycle, with a right first time approach to dealing with and managing demand, reducing duplication, time delays and handovers, completing tasks in an effective and efficient way, reassessing proportionality, particularly concerning the investigation of crime and reduction in the victim journey.

The main aims of the Capability workstream are to understand what officers and staff can do, what skills they have and what skills will be required in the future. The Force must ensure that officers and staff have the training, equipment and technology to meet the demand faced in protecting its communities. To achieve this, the Force has recently agreed five recommendations:

- Explicitly use the Strategic Threat and Risk Assessment as a specific category within all training request templates;
- Where there is an agreed minimum level of trained officers for statutory requirements e.g. Public Order and Civil Emergencies; the force monitors these levels and reports by exception to the Training Priorities Panel (TPP);
- Where the skills fall outside of the minimum levels prescribed by the National Policing Requirement the force agrees what levels the force requires and ensures these are both maintained and monitored via the TPP;
- The external training request template be amended to show current numbers of officers who are trained and currently hold that skill;
- To allocate an operational client lead for each area of training.

### **2.5.2 Induction**

On commencement of 'employment' all new police officers complete the Police Constable Student Officer Learning and Assessment Portfolio (PC-SOLAP) as part of their Initial Police Learning and Development Programme (IPLDP). An equivalent SOLAP is also completed by PCSOs and Special Constables. The Professionalising Investigations Programme (PIP) provides accredited training for the development of investigative skills.

Following their initial training on the IPLDP programme all student officers complete the Police Constable Student Officer Learning and Assessment Portfolio (PC-SOLAP). A role-focused assessment portfolio is also completed in a similar way by PCSO's and Special Constables. The Professionalising Investigations Programme Level 1 (PIP) forms a part of the PC-SOLAP, and is an accredited assessment of initial investigative skills for priority and volume crime.

An 'Induction Checklist' was developed by HR which all line managers are required to complete within three months of new members of staff commencing their role, however, this was never fully implemented. It is recommended that this action is refreshed to ensure a robust and consistent induction process for new starters.

### **2.5.3 Training**

Learning and development is delivered collaboratively by EMCHRS L&D. Each force within the collaboration holds quarterly Training Priority Panels which set the learning and development priorities. Training priorities are based on consideration of risk and forthcoming legislative changes; they are informed by both emerging national issues and local priorities.

## DRAFT

Completion of training is formally monitored with regular reports being produced and completion / non completion records sent to BCU and department leads. Completion is discussed at every TPP meeting as part of the KPI reports.

The National Centre for Applied Learning Technologies (NCALT) Managed Learning Environment (MLE) is used to provide a range of e-learning courses to officers and staff, who are required to complete mandatory packages on topics such as Health and Safety and Information Assurance.

A link to the force e-learning calendar is provided on the EMCHRS L&D intranet page to give advanced notification of the release of NCALT packages. E-learning is also promoted via Weekly Orders and the intranet to encourage completion. Reports are received from EMCHRS on staff and officer who have completed NCALT exercises. This is also reported to the Training Priorities Panel.

Individual training needs should be assessed as part of the PDR process however there is limited assurance that PDRs have taken place consistently across the Force during 2015/16. This finding is supported by HMIC's PEEL Legitimacy Inspection. In response to this, a new PDR process went live in April 2016 which will allow officers and staff to store evidence and update objectives online throughout the year. Competency gaps can also be recorded and training and development needs identified as a result. Reports will be generated for divisional and departmental heads to assess the level of compliance within their respective areas.

### **2.5.4 Career pathways**

Career pathways have been introduced for investigating officers during 2015/16. There is also a Senior Detective Panel which seeks to identify requirements and develop officers in specific areas. 2015/16 is also the second year of the Annual Detectives Conference which comprises of four days training for all Force detectives.

### **2.5.5 Succession planning**

A Succession Planning Framework was agreed at the FEB in June 2015. The existing process for senior detective succession planning was extended and enhanced to include all senior police officer posts within the Force at Chief Inspector and above. Due to limited resources, the agreed Framework has not yet been implemented. Succession planning does take place in Force although not in a consistent and structured manner, it is recommended this is reviewed as part of the Strategic Alliance.

## **2.6 Principle 6: Engaging with local people and other stakeholders to ensure robust public accountability**

### **2.6.1 Community engagement and consultation**

#### **Neighbourhood policing engagement**

There are a number of engagement mechanisms in place for services delivered in the community. Formal mechanisms include Victim Satisfaction Surveys, Neighbourhood Watch Meetings, Locality Boards, Key Individual Networks and Independent Advisory Groups.

The Force has developed a robust structure of strategic and local Independent Advisory Groups (IAGs) which represent different community groups across the City and County Divisions. They provide an invaluable service to the Force in three core areas; critical incidents, building trust and confidence and advising on strategies, policies and procedures.



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The Neighbourhood Alert Electronic Communication System is designed to help members of the public communicate with their local Neighbourhood Policing Team and their local Neighbourhood Watch Coordinator. The system can be used to report information about suspicious behaviour and antisocial behaviour and to allow users to be sent information about crime trends in their area and community safety and crime reduction advice. The aim is to provide up-to-date information direct to registered members to support two-way communication between members of the public, Nottinghamshire Police and Neighbourhood Watch.

There are also a number of partnership mechanisms in place to consult and engage with communities in the City. The City Council Community Cohesion Team work to reduce inequalities, discrimination and levels of deprivation and increase community engagement, promote interaction and increase safety and respect of individuals and communities.

The Respect for Nottingham Survey is commissioned by the CDP. The Survey explores the views of local residents about their local area in relation to ASB, crime and community safety and the strategic partnership between the Police and Council.

HMIC's PEEL Legitimacy inspection identified that officers and staff have a good understanding of the people they serve, however this understanding is not formally recorded, which means it cannot be shared across teams. It was recommended that 'the Force should ensure that its local teams have sufficient information available to them to improve their understanding of local communities<sup>2</sup>'. This action is being progressed by the City and County divisions to ensure adequate assurance can be provided in this area.

### **Digital media**

At a universal level engagement takes place through social media platforms, including Facebook, Twitter and YouTube. The Force website also provides a forum for local updates from each Neighbourhood Policing Team (NPT) area along with priorities, contact details and details of engagement events. The Neighbourhood Priority Survey was introduced as part of a commitment to creating safer neighbourhoods; it allows individuals in the community to influence how their area is policed by completing a short survey which is available on the Force website.

Thematic online events are held regularly to enable the public to interact with the Chief Officer Team, with other members of the Force and the NOPCC on relevant matters.

### **Victim Satisfaction Surveys**

The Market Research Team currently undertakes a large survey project with victims of crime, in addition to other ad hoc pieces of consultation, such as Staff Surveys, Professional Standards Directorate External Complainant Survey and engagement support.

Market Research currently manage the sampling, feedback and reporting of approximately 5,500 telephone surveys with members of the public, per year, for victim satisfaction purposes. Victim Satisfaction Surveys are structured around a number of core questions, exploring satisfaction around contacting the police, the actions taken by the police, being kept informed, how the victim was treated. The results are reported within monthly the Performance & Insight Report, Confidence and Satisfaction dashboard, Satisfaction by Team report and also at Organisation Performance Review meetings.

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<sup>2</sup> HMIC: PEEL Legitimacy, February 2016, p.29, <http://www.justiceinspectors.gov.uk/>

## **2.6.2 Workforce engagement and consultation**

The Force consults with the trade unions when proposing changes in pay and conditions which are not set nationally. Consultation with Police Staff Associations takes place at the Joint Negotiating and Staff Consultative Committee, chaired by the Chief Constable.

A Memorandum of Understanding between the Force and the Diversity Staff Support Associations (DSSAs) documents agreed arrangements between the Force and DSSAs in terms of funding, use of ICT and facilities and the implementation of a DSSA Support Manager who will receive regular updates on DSSA agendas.

The People Survey, which was developed by Durham University, took place in June 2015. Outcomes were explored by Senior Managers through further interviewing of officers and staff. The resulting data was assessed qualitatively by the Research function and discussed at a Senior Leadership Conference in order to identify and prioritise actions. Implementation of the actions is being monitored via the People Board, which provides a forum for attendees from across the organisation to discuss ideas and suggestions to improve the working environment.

The Force intranet provides an informal forum for internal feedback including online chats and discussion forums which enable staff to voice issues that matter to them with members of the Chief Officer Team or relevant department such as the MFSS discussion forum.

## **3.0 Review of effectiveness**

Nottinghamshire Police has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework. The review of effectiveness is informed by the work of the Chief Officer Team, the Heads of Divisions and Departments and other senior managers within the Force who have responsibility for the development and maintenance of the systems of internal control. It is also informed by the reports of the Force's internal auditors and external inspectorates, such as HMIC.

During the review, each Chief Officer Team member and Divisional and Departmental Head have provided the Chief Constable with a comprehensive, signed Statement of Assurance which outlines their compliance with the Force's governance framework during 2015/16. An overall Force response has been summarised in this Statement.

Where weaknesses in internal controls have been identified, improvement actions have been established, which will be addressed during the forthcoming financial year. Outcomes will be monitored by the FEB and the Joint Audit and Scrutiny Panel, on a quarterly basis.

## **4.0 Improvement actions**

The review process to support the production of the Annual Governance Statement in 2015/16 identified a number of improvement actions, which are summarised in Appendix A of this report. These have been agreed with the respective Divisional and Departmental Heads to address weaknesses identified in the Force's systems of internal control. These issues are significant in that they cover a large proportion of the organisation's activities and/ or are key risk controls and therefore require a corporate solution.

Please see Appendix B to this Statement for an update on the improvement actions identified in the Force's 2014/15 Statement.

## Chief Constable and Chief Finance Officer Declaration

We propose over the coming year to take steps to address the improvement actions identified in Appendix A to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation as part of our next annual review.

Signed \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

Date \_\_\_\_\_

Chris Eyre  
Chief Constable

Paul Dawkins  
ACO Finance and Resources  
Chief Financial Officer

## Appendix A: Identified improvement actions from 2015/16

The following improvement actions were identified for 2015/16, these are summarised according to the relevant governance principle.

### Principle 2: Leaders, officers and partners working together to achieve a common purpose with clearly defined functions and roles

| Identified improvement action(s):  | Lead Dept.      |
|--|-----------------|
| Negotiation should take place between the PCC, Nottinghamshire Police and MFSS to establish how the current authorisation limits, as agreed within the scheme of delegation, can be embedded into the current purchasing process. All approval of purchases should then be in line with the agreed Scheme of Delegation and Financial Regulations. (Mazars, Core Financials)                     | Finance         |
| The Force should review its Expenses Policy to ensure it remains fit for purpose and includes clear guidance on all categories of expenses and those which are appropriate to be claimed through the self-serve systems. The review should also ensure that authorised limited for categories of expenditure remain valid. (Mazars, Core Financials)   | Human Resources |
| The NOPCC should undertake a review of the Governance and Decision Making Framework to ensure it remains up to date and fit for purpose in terms of the way decisions are required to be made. Particularly those with a non-financial impact (or of significant public interest) which are not currently covered in the Working Together document. (Mazars, Joint Code of Corporate Governance) | NOPCC           |
| Contracts should be in place for all purchases over £25000 and these should be signed by all parties prior to the commencement of the contract. (Mazars, Procurement)  | EMSCU           |
| A formal approval process should be established within the Force before new suppliers are entered into the Oracle system. (Mazars, Procurement)  | Finance         |
| Management should look to implement an exception reporting system in conjunction with the MFSS to monitor payments which are outside of the approved process. (Mazars, Procurement)  | Finance         |

### Principle 3: Promoting values for the Force and demonstrating the values of good governance through upholding high standards of conduct and behaviour

| Identified improvement action(s):   | Lead Dept.             |
|---|------------------------|
| Conduct further training with IAOs during 2016/17 to ensure they fully understand their roles and responsibilities, including ownership of information risk and attendance at FIAB. | Information Management |
| Implement a strategy for the further development of MoPI in Force, which provides a detailed improvement delivery plan.   | Information Management |

**Principle 4: Taking informed and transparent decisions which are subject to effective scrutiny and managing risk**

| <b>Identified improvement action(s):</b>   | <b>Lead Dept.</b>     |
|--|-----------------------|
| Introduce a mechanism for publishing key decisions made at the FEB, both internally and externally, in line with the ICO Publication Scheme.   | Corporate Comms       |
| Ensure consistency in publishing key decisions from the FEB on the intranet to promote internal transparency and engagement.   | Corporate Comms       |
| Introduce a quarterly update to the FEB on improvement actions identified in the AGS to ensure robust oversight of implementation.   | Corporate Development |
| Evaluate, review and further develop the risk management and information risk management process to enable effective decision making within the Force and the NOPCC.                             | Corporate Development |
| Re-establish a formal quarterly risk review and reporting process and further develop the process for identifying potential new risks.   | Corporate Development |
| Implement a process to ensure robust oversight of horizon scanning outcomes and subsequent identification and assessment of risk and opportunity in consultation with the relevant lead officer. | Corporate Development |

**Principle 5: Developing the capacity and capability of the Force to be effective**

| <b>Identified improvement action(s):</b>   | <b>Lead Dept.</b> |
|--|-------------------|
| It is recommended that proper recording and reporting mechanisms are developed for skills and training of officers and staff through MFSS. This is critical to ongoing delivery of appropriate training. | MFSS              |
| Review the requirement for formal succession planning framework as part of the Strategic Alliance.   | Human Resources   |

**Principle 6: Engaging with local people and other stakeholders to ensure robust public accountability**

| <b>Identified improvement action(s):</b>   | <b>Lead Dept.</b>        |
|--|--------------------------|
| The Force should ensure that its local teams have sufficient information available to them to improve their understanding of local communities. (HMIC: Legitimacy) | City and County Division |

**Appendix B: Update of improvement actions from 2014/15**

The following is a summary of recommendations for improvement identified in the 2014/15 AGS alongside the Force's response.

| Identified improvement action(s)   | Force response  |
|--|---|
| <p>The Force should implement its plans for a new and affordable operating model in order to reduce long term risks to policing services.</p> <p>(HMIC: Valuing the Police Inspection, October 2014)</p>   | <p>This recommendation continues to be addressed under the Designing the Future Programme (DtF). New Response and Public Protection operating models were implemented during 2015. A new Thematic Policing Model is set to be introduced during mid-2016.</p>   |
| <p>Address concerns about inconsistencies with investigation offending, the importance of supervision and the need for professional training.</p> <p>(HMIC: Crime Inspection, October 2014)</p>  | <p>The Force is dedicated to professionalising investigations, in order to address inconsistencies and to improve supervision the following has been implemented. Every month there is a Professionalising Investigations meeting that has several work streams including Disclosure, Investigative Interviewing, Proportionality and Investigations Standards. These areas are dip tested to ensure consistency and high standards are maintained.</p> <p>Supervisors' briefings have been implemented for Investigations, which include hints and tips around the Golden Hour and the 5 Building Blocks. Sergeants have also been on a back to basics training course that looks to refresh their knowledge on disclosure and file quality. The Force has also implemented Career Pathways which aims to rotate the skills of the DC's and DS' to ensure an omni-competent workforce. In March 2016 there were four Crime Conferences for DC's, PIO's and DS' which delivered CPD learning to about 400 officers.</p> |
| <p>Address the potential for improvements in management oversight of child protection work, including the benefits of service reviews and the use of performance data to improve services and develop work with partner agencies.</p> <p>(HMIC: National Child Protection Inspections, September 2014)</p> | <p>Work continues in this area to address a number of interdependent recommendations from HMIC with regard to child protection. Implementation of actions will be overseen by the FEB and the Joint Audit and Scrutiny Panel.</p>   |
| <p>The Force should review its capacity and capability to carry out proportionate investigations into public complaints to</p>   | <p>Action complete. Resources within PSD are regularly reviewed to manage workload; recent data from the</p>  |

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|  |   |
|--|---|
| <p>minimise delays.</p> <p>(HMIC: Police Integrity and Corruption, November 2014)</p>  | <p>Independent Police Complaints Commission (IPCC) shows that the Force is now in line with national averages with regard to investigations into public complaints.</p>   |
| <p>Recommend development of an information management strategy, which should clarify responsibilities and procedures across areas including records management, information security and data quality.</p> <p>(Baker Tilly: Information Management, July 2014)</p>                         | <p>Action complete. An Information Management Strategy was developed in 2015/16 to set out a roadmap for further developing IM capability and effectively embedding an information assurance culture across the Force. Implementation is on-going.</p>  |
| <p>Recommend tighter procedures and documenting of actions taken in compliance with the Code of Practice for Victims, and also a more formal approach to the delivery and monitoring of training with the Code.</p> <p>(Baker Tilly: Code of Practice for Victims of Crime, July 2015)</p> | <p>Action partially complete. A briefing has been published on the Force intranet to give officers and staff 'Important Victim of Code of Practice Pointers' to ensure compliance with the Code. Sergeants on Division have also been asked to brief their teams with regard to changes and requirements. These will also be communicated through weekly orders.</p> <p>Officers are required to document details of the needs assessment at the point of entering a crime occurrence onto Niche, unless there are extenuating circumstances.</p> <p>Training continues to be monitored through EMCHRS.</p> |
| <p>Develop and deliver the Force's Special Constabulary and Volunteers Strategy.</p> <p>(Baker Tilly: Volunteering, April 2015)</p>  | <p>Action complete. The Citizens in Policing Department Strategic Plan and associated delivery plan is now being implemented.</p>   |