



# PEEL Review Action Plan

August 2017

(Final)

# Contents

- 01 Introduction
- 02 Background
- 03 Key Findings
- 04 Conclusion

## Appendices

- A1 Detailed Audit Findings
- A2 Audit Information
- A3 Statement of Responsibility

## 01 Introduction

This audit forms part of the agreement between Mazars LLP and the Office of the Police & Crime Commissioner (OPCC) for Nottinghamshire and Nottinghamshire Police. It has been carried out as an addition to the approved Internal Audit Plan for 2017/18, upon request of the Police & Crime Commissioner.

The audit review focused on Force responses and actions taken to address the issues in the Monitoring Assurance Framework that was produced by the OPCC following the publication of the HMIC PEEL: Police Effectiveness Report in March 2017. The audit focused on whether:

- The Force has effective and robust plans in place to address the issues raised in the PEEL report.
- The action plans specifically address the issues raised in the PEEL report.
- The plans have been approved and communicated, and there are effective processes in place to monitor their delivery.

We engaged with a number of staff members across the Force and OPCC during the review and are grateful for their assistance during the course of the audit.

## 02 Background

The Force were subject to a Her Majesty's Inspectorate of Constabulary ("HMIC" inspection in September 2016 as part of annual inspections of police effectiveness, efficiency and legitimacy (PEEL), HMIC assesses the effectiveness of police forces across England and Wales.

The outcome of the inspection was published in a HMIC report in March 2017. The report made a number of observations of how the Force could improve and, overall, it was rated as 'requires improvement'. The OPCC reviewed the report in full and created an Assurance Monitoring Framework, which includes 78 observations or comments in the HMIC report that the Force needed to action. Moreover, the Police & Crime Commissioner wrote an open letter in response to the report, and asked for the internal auditors to review the Force responses to ensure they were addressing HMIC concerns.

There were two specific areas of concern highlighted by the PCC; these were in respect of observations in relation to domestic abuse and the Force understanding of local communities. As a consequence, internal audit selected the observations in the Assurance Monitoring Framework that related to these two areas and carried out a review of the Force response.

Following the inspection in September 2016, a 'hot de-brief' was undertaken with HMIC, and the Force reviewed and responded to the observations that HMIC raised. A gold meeting group was formed and has been meeting regularly to action the concerns raised. Audit were informed that one of the key findings in the HMIC report highlighted a difference over the handling of vulnerability at the Force compared with HMIC's expectations. Therefore, at the request of the Chief Constable, a two day visit by HMIC is planned for August to directly address these differences in approach.

In addition to the Gold Group meetings, the Risk & Business Continuity Advisor has been monitoring the Force responses to the HMIC report and actions have been added to the '4action' monitoring software, which the OPCC have access to, which enables them to also track progress.

## 03 Findings

The Force have put in place an action plan where they have recorded all agreed actions following the PEEL inspection de-brief meeting and the subsequent publication of the report. Audit reviewed each of the observations under two areas 1) Domestic Abuse and 2) Local Communities. A detailed review of each Force action is documented in Appendix A1, with the findings summarised below.

### 3.1 Domestic Abuse

There are a total of 13 individual observations within the Monitoring Assurance Framework that related to domestic abuse, however there are a number of responses that address more than one observation. Audit confirmed that a Daily Management Briefing Process is now in place. This includes a daily review of outstanding Domestic Incidents and Domestic Abuse for appropriate priority rating and the resource allocation to address them. The aim is to prevent backlogs being created and abuse victims not receiving appropriate visits.

In addition, work has been carried out by the Force Crime Registrar to review the recording of incidents and crimes. A daily audit process is in place that highlights any incidents that are recorded with key markers, including domestic abuse, that have not been 'crimed'. These incidents are then allocated the appropriate response so victims are not missed. Moreover, updated guidance has been produced by the Contact Management Centre to ensure they are made aware of how to correctly record domestic incidents and domestic abuse. These factors combine to ensure victims are correctly recorded when the Police are made aware of them and that they receive a timely response through daily monitoring of outstanding incidents. Whilst general response times are monitored by the Force, at present they do not break these down by type of incident and therefore cannot see the response times for victims of domestic incidents. Whilst the information has been requested from the Performance Team, it is not in place as yet with no timetable for this to be completed.

The HMIC report highlighted that a high number of DASH forms were awaiting secondary assessment, resulting in cases involving abuse victims not being thoroughly assessed. Additionally, there was no process in place for escalating repeat victimisation. Audit confirmed that a Managing Demand Gold Group meeting is now in place and meet on a monthly basis to allow senior management to highlight any issues of concern across key areas in the Force. Since the HMIC inspection, the department in question, DASU, have increased its resources, they have also established a monitoring spreadsheet within the department so twice daily they are able to see how many DASH forms are awaiting the secondary assessment. This allows management in the department to allocate resources accordingly and ensure backlogs do not escalate.

The Force have also introduced a monthly management information report that highlights any repeat victims. These are reviewed by management at the Monthly Operational Performance Review and the risk level updated or escalated as required following review.

HMIC highlighted an inconsistency across the Force area in relation to Multi-Agency Safeguarding Hubs (MASH) and the Force has liaised with the OPCC and partners and a MASH was opened in June 2017 and has subsequently been visited by HMIC.

There was also an inconsistency in the Force approach to Multi-Agency Risk Assessment Conferences (MARAC) where the approach in the city and the county differed when referring high risk cases. The Force has a documented referral process for high risk victims to the DART (Domestic Abuse Referral Team). Agreement has recently been made with the Force's city partners to host a city MARAC on a more frequent basis to ensure all high risk cases will be reviewed at a MARAC. This is due to be put in place from September onwards.

A number of observations by HMIC focused on ensuring officers understanding of how children can be affected by domestic abuse. Audit confirmed that a Voice of the Child action plan had been created within the Public Protection department. This action plan included increasing awareness of staff and, as a result, a number of bite size videos have been produced and are available for staff to view on the Force intranet.

### 3.2 Local Communities

There are a total of nine observations made in the Monitoring Assurance Framework in respect of communities, with a number of these all relate to the Force's understanding of the communities that it serves. The Force response focuses on the creation of Community Profiles for each of the Force areas and the development of Engagement Plans for each area to reflect the needs and priorities of that area.

Audit confirmed that progress had been made in the development of the community profiles and engagement plans, with 23 profiles and associated engagement plans being put in place. The Force have put in place a Support and Scrutiny process for its individual engagement plans where the Neighbourhood Police Inspectors (NPI's) present their plans to senior management and open discussions are held to support the inspector and provide feedback on areas on which the plan could be further developed. The process is to be completed bi-annually to ensure NPI's remain focused on their engagement plans. In addition to the engagement plans, the Neighbourhood Policing Team are currently in the process of writing an Engagement Strategy, although there is no timeline for completion of this document at present.

An observation by the HMIC was that the Force did not effectively share information with its partners. The Force has worked with the OPCC on the implementation of the E-Cins software, a web based sharing portal, where the Force intends to hold the community profiles so partners can have access to appropriate levels of Force information. However, this process is still ongoing and a review of E-Cins found that data had not been uploaded as yet and levels of access for relevant police staff and partners was yet to be formalised.

The community profiles and engagement plans are considered 'live' documents and the NPI's are responsible for the regular update of these documents. However, at present this responsibility is not clearly documented and guidance is not in place to inform NPI's how this updating should be completed.

One of the other observations by HMIC was that the Force did not use the MoRiLE risk assessments methodology and this included how the Force assesses the vulnerability of communities. Audit confirmed that the Force have recently put in place a Strategic Intelligence Assessment that has adopted MoRiLE as its methodology.

## 04 Conclusion

The Force have clearly made progress against implementing actions to directly address HMIC concerns and to prevent a repeat of previous issues.

However, in a number of the actions taken they remain on-going and the Force should consider re-iterating the need to complete the agreed actions in a timely manner, these being:

- Implementation of E-Cins for sharing information, including processes for managing the information stored on the system and keeping it up to date;
- The completion, and approval, of an Engagement Strategy for local communities; and
- Management Information for breakdown of Force response time to visit domestic abuse victims.

There were also a number of actions that could be further strengthened to ensure the processes are clearly embedded, these being:

- Documentation of responsibilities for NPI's in managing the community profiles and engagement plans;
- Regular updating of the community profiles and engagement plans; and
- Reconciliation of NICHE records to MARAC records to ensure all high risk cases recorded have been submitted for review.

For one of the observations this was not listed on the Force action plan being monitored by the Risk Advisor. This related to a HMIC observation around the Operation Vanguard Team. The Forces' response in the monitoring assurance framework focused on the fact that this team has now been incorporated into a new structure. Clarification on how the new structure addressed the observation was sought and, although a response was provided to audit, the Force should review what processes it has in place within the new structure to ensure that the HMIC observation has clearly and fully been addressed.

## A1 – Detailed Audit Findings

### Local Community Understanding

We identified all instances of HMIC observations in relation to local community understanding listed in the action plan and reviewed the Force response to the observation, with the findings summarised in the table below.

HMIC Observation (Reference in Assurance Monitoring Template)	Force Response in Assurance Monitoring Template	Audit Findings
<p>The Force's understanding of the communities it serves, the risks they face and their priorities is limited (Reference Page 17, Item 2).</p> <p>Local teams still do not have sufficient information to enable them to improve their understanding of local communities (Reference Page 18, Item 3).</p> <p>Nottinghamshire Police has a limited detailed understanding of the communities it serves and the risks they face and their priorities (Reference Page 24, Item 10).</p> <p>We said that the force should ensure that its local teams have sufficient information available to enable them to improve their understanding of local communities. This situation has not improved. Local policing teams still do not have access to a comprehensive range of information (Reference Page 25, Item 12).</p> <p>There are inconsistent local arrangements to meet with communities and sometimes a limited understanding of their priorities (Reference Page 25, Item 14).</p> <p>The force should work with partner organisations to share information and improve its understanding of local communities (Reference Page 6, Item 1)</p>	<p>The force has updated the community profiles for each of its communities within the Neighbourhood Policing Teams. Every area now has a community profile and an engagement plan. The profiles and documents are 'live' and subject to regular review and update.</p> <p>Supt Fretwell is meeting each Neighbourhood Policing Inspector individually to review the profiles and plans to embed the process and share best practice across the force. The Community Profiles are shared with local authority partners and there has been positive feedback with some areas looking to now further develop joint community profiles. This will be systemised and shared through ECINS when all partners have access.</p> <p>The development of new partnership hubs in the County area, similar to those in existence already within the City, have been developed on the established best practice of Op Aurora 2.</p> <p>Mansfield Officers and staff now collocate with a range of partners in the Council offices, as do Ashfield. Both are proving effective in further developing the community profiles and engagement plans and increasing the knowledge of the communities in the areas.</p> <p>The force have completed a first round of support and challenge performance meetings and this cycle will repeat</p>	<p>The Force response to lack of local community understanding focuses around the development and ongoing monitoring of Community Profiles and Engagement Plans.</p> <p>Audit reviewed existing processes that have been developed and found the implementation of bi-annual support and scrutiny meetings to ensure Neighbourhood Police Inspectors are monitoring and updating engagement plans.</p> <p>Audit were provided with an example of an engagement plan and a community profile. It was noted that the profile stated that it was last updated in September 2016. Whilst it is a live document, care should be taken to ensure they are updated regularly.</p> <p>The Force has an Engagement Strategy in place, however there is a proposed addendum to this policy that will reflect how the Neighbourhood Policing Teams will engage with their local areas. It was noted there is no timetable for the completion of this strategy.</p> <p>Audit also observed in the Engagement Plans that a variety of ways to engage with the community are listed by type i.e. social media, joint events etc.</p> <p>Audit also agrees with the Force response in that engagement will be bespoke to the area and so will not</p>

	<p>every 6 month. Each Neighbourhood Policing Inspector will report on progress made to achieve the agreed engagement and identification of vulnerability.</p> <p>Our staff who work in the county are linked in to the SNB 'new and emerging communities' work stream.</p> <p>In the city our officers and staff work within the Cohesion Team to develop our understanding and engagement with communities, both existing and emerging.</p> <p>The force also works closely with the Officer of the Police and Crime Commissioner in developing the Police and Crime Needs Assessment.</p> <p>The Office of the Police and Crime Commissioner has funded a web based solution (ECINS) that allows for information sharing and tasking between partners to take place in an efficient way</p> <p>Community profiles, engagement plans and problem solving plans are uploaded onto the system and where appropriate then these can be shared on ECINS with relevant partners.</p> <p>Nottinghamshire Police has undertaken significant work to co-locate with partner organisations for example Central Police station and Mansfield District Council to name two, where fast time information sharing and partnership assets are deployed to service local need.</p> <p>The work within the city unitary council area and sharing of information through the joint working has been favourable reported upon by the Home Office in terms of Community Cohesion and Serious and Organised Crime.</p> <p>Since the last inspection Nottinghamshire Police has signed an Information Sharing Agreement with the Strategic Analytical Unit of the County Council to improve information sharing</p>	<p>necessarily be consistent across areas. However, the introduction of the template for all plans ensures a consistent way to document the approach.</p>
--	--	---



	<p>which has now commenced.</p> <p>Data used within the Neighbourhood profiles is obtained from a number of partnership sources provided by the Strategic analytical unit at the County Council.</p> <p>Data sets used includes Nottingham Insight, census data, CCG data etc. Work is underway to access additional data sets to make the profiles even more meaningful and informative.</p> <p>The profiles are new and currently stored on force systems but they will go on to ECINS in the very near future and through that platform they will be shared with partners. All of the NPIs have had a one to one support and challenge meeting and in the next six months they have been tasked to approach Local partners and share the profiles with them and look at what data sets are held locally in order to grow the profiles and make them more informative at the local level.</p> <p>We are working with the County New and Emerging Communities Group to look at how the profiles can be further developed.</p> <p>We are also working with the Strategic Analytical Unit to develop improved data that can be made available on ECINS for partners.</p> <p>Nottinghamshire Police is committed to maintaining a substantial dedicated Neighbourhood Policing throughout the county and this supports vast community engagement activity thus ensuring that we understand local community priorities.</p>	
<p>In some areas there is a good understanding, for example, the community cohesion team in Nottingham has good links with minority communities, including Polish, Kurdish and Somali. However, this understanding is not widespread (Reference Page 25, Item 13).</p>	<p>The engagement plans that have been developed are bespoke around the local communities so will not look the same in all areas.</p> <p>Specific examples are:</p> <ol style="list-style-type: none"> <li>1. Emerging Romanian community in Warsop has led to</li> </ol>	<p>The work completed by Insp Kaur, in the Community Cohesion Team, in co-ordinating, liaising and communicating with local communities and partner organisations was highlighted as best practice. Insp Kaur has been involved in leading on the community engagement and advising on the engagement approaches taken and will</p>

	<p>bespoke plans around engagement</p> <p>2. Large Gypsy Roma Travelling community in Newark and refreshed engagement plan</p> <p>It should also be noted that Insp Kaur attends the NP 1/4ly meeting to share best practice. She has also led on a piece of work to develop the KIN network and utilise ECINS to share this information.</p> <p>Insp Kaur is also tactically advising Supt Firth around engagement approaches to identify and engage with at 'risk communities' around SOC, cyber-crime and fraud etc. This is a really good example of the sharing of best practice.</p>	<p>feed into the ongoing Engagement Strategy that will be completed to share this best practice approach.</p> <p>Consistency in engagement plans across the areas also assists in sharing best practice.</p>
<p>Although the link to the strategic assessment is not clear. It has not yet adopted the MoRiLE risk assessment process, which is the preferred model of assessment within the East Midlands region. The force currently <b>assesses the threat and risk</b> from organised crime using a <b>risk assessment methodology</b> which <b>does not consider the capability or capacity of the force</b> to deal with the problem, and is <b>limited</b> in how it assesses vulnerability in its communities.</p>	<p>The force is using MoRiLE in all tactical tasking and strategic processes</p>	<p>The Force published the Strategic Intelligence Assessment in April 2017 that clearly includes the MoRiLE risk assessment methodology.</p>
<p><b>Operation Vanguard team:</b> While staff in this team are aware that the force's priorities are to cut crime and keep people safe, they <u>have limited knowledge of the national serious and organised crime priorities</u>. Work assignments do not routinely assess the threat, harm and risk of the organised crime group or its impact on local communities (Reference Page 44, Item 58)</p>	<p>This now sits within the Integrated Offender Management structures and is part of that governance process.</p> <p>The Vanguard Plus team has now been moved under the IOM structure. The cohort is now managed to IOM standards using systems and processes which have been rated as good practice by the HMIC. (Daily risk review, weekly multi agency case conference, intel and PND monitoring).</p> <p>The cohort is also now subject to a case management system (ECINS).</p> <p>The pertinent offences (knife and gun crime particularly) have been added to the IOM selection and risk matrix and as of April 2017. The Vanguard Plus managed cohort has been absorbed into the wider IOM cohort.</p>	<p>This particular observation was not part of the Force action log being managed by the Risk Advisor, however this was due to the fact the Force believe the new structure for Organised Crime covers the observation that was made in reference to the Operation Vanguard Team.</p> <p>The Force feel that the tasking element within the new structure ensures staff are tasked in regard to the national serious and organised crime priorities.</p>

	<p>The engagement staff from Vanguard Plus have been relocated to the City YOT (which also sits under the IOM structure) to deliver statutory/non statutory, early intervention and diversion work (including schools delivery). In addition to this the seconded officer within social care now operates under IOM with a view to coordinating action across CSE, Girls and Gangs and the exploitative part of the national EGVE strategy.</p> <p>DWP has also co-located within the IOM multi agency premises to share information more effectively and deliver pathways work around training, education and employment.</p>	
--	--	--

## Domestic Abuse

We identified all instances of HMIC observations in relation to domestic abuse listed in the action plan and reviewed the Force response to the observation, with the findings summarised in the table below.

HMIC Observation (Reference in Assurance Monitoring Template)	Force Response in Assurance Monitoring Template	Audit Findings
<p>During fieldwork, HMIC identified serious concerns with crimes still not being recorded for those incidents that are not allocated to an officer...they include crimes of domestic abuse where victims have not been visited, in some cases for many weeks, and are not recorded as a crime. (Reference Page 24, Item 9)</p> <p>The force reports that on most days there are 130 unallocated incidents and these are described as lower-risk incidents. During our fieldwork, we found <b>247 unallocated incidents</b>, none of which had been assessed to see if a crime needed to be recorded. Of these, <b>61 were domestic incidents</b> and when these were examined, 23 incidents were immediately brought to the attention of the force because of serious concerns regarding welfare and safeguarding (Reference Page 38, Item 39).</p> <p>There are significant delays in attending some of these incidents; one domestic related incident had <b>still not been attended after four weeks</b> and the victim did not wish to have any further police contact. Appointments are booked with victims and witnesses, but sometimes these appointments take place a considerable time after the incident (Reference Page 39, Item 41).</p> <p>HMIC is seriously concerned about the number of incidents which remain unallocated and which involve victims who are</p>	<p>Nottinghamshire Police identified that as a result of reducing the Crime Management Bureau (the unit that traditionally conducted audits and compliance work) staff in an attempt to release staff to deal with demand, the force began to see a dip in overall NCRS compliance.</p> <p>To remedy this dip in NCRS performance, Nottinghamshire Police introduced a daily audit regime looking at closed incidents, prioritising violence and sexual offences, to provide assurance that our compliance would improve.</p> <p>Rather than simply look at current incidents, the force led an internal review of all incidents over the period from when the CMB team was disbanded. This identified a number of incidents where NCRS standards were not achieved and all of these were allocated crime numbers retrospectively and further reviewed to ensure that a proper service had been given to the victims. Nottinghamshire police highlighted these shortfalls to the HMIC when they visited.</p> <p>Going forward, Nottinghamshire Police will have an established review and audit team (NCRS Champions team) who will work closely with the CRIM to ensure that all incidents are reviewed to ensure NCRS compliance.</p> <p>Until fully established, the daily audits remain in place to ensure compliance going forward.</p>	<p>An audit is undertaken on a daily basis by the NCRS Team – headed by Paul Cook, the Force Crime Registrar. Internal Audit carried out a review of this area of work in May 2017 with Satisfactory Assurance Opinion give.</p> <p>As part of this teams work, they identify where incidents are not recorded as crimes when they should do and therefore prevent any domestic incidents being incorrectly recorded and thus not being allocated to officers in a timely manner.</p> <p>Audit were provided with the updated Contact Management Process – this states any incidents of domestic abuse will be a Grade 2 (out of 5 grades) and this will have a quicker response to it.</p> <p>Each Head of Dept is provided with a daily management briefing which includes a review of all incidents that are outstanding from the last 24 hours. IT provides a breakdown of outstanding incidents across the policing areas. However, it also includes a list of individual incidents that are recorded as Domestic Incident, Domestic Abuse and Vulnerabilities. During the meeting the management team in that area review each case to ensure the grading is correct and then they will allocate the necessary resources to ensure it is dealt with.</p> <p>The Force does have performance monitoring in general for its response times to incidents however, at present, it does not break this information down at a type of incident level. Det Ch</p>

<p>vulnerable, particularly domestic abuse victims. At the time of our inspection, there were <b>61 domestic-related incidents</b> where the victim had yet to receive a visit from the force, the oldest of which dated <b>back four weeks</b>. This level of backlog is unacceptable. It means that the force is not giving vulnerable victims any form of protection for several days and is missing valuable opportunities to collect evidence and move an investigation forward (Reference Page 40, Item 46).</p>	<p>This finding was immediately actioned by the force with the establishment of the Vulnerability Gold Group Chaired by the ACC.</p> <p>This has cross references with the Demand Gold Group that is planning to mitigate seasonal demand spikes.</p> <p>Key Police officers and staff attended these meetings and a series of actions were created and completed to address the concerns raised.</p> <p>The Review of unallocated domestic abuse at the Daily Management Meeting ensures that this is no longer possible.</p> <p>A review of incidents on the 27/4/17 showed that there were 17 domestic incidents in total that were yet to be resourced and of those 8 were older than 24 hours and the eldest was 8 days.</p> <p>The daily review ensures that the force is constantly making attempts to see the victim and in cases where we are not able to attend it is usually because of an uncooperative victim rather than because we have been unable to identify a resource to attend.</p>	<p>Insp Foster informed audit that he has requested that this information become available from the Performance Team, and it is anticipated that this will be in place by Sept 2017.</p> <p>Audit were informed that a HMIC Vulnerability and Managing Demand meeting now takes place on a monthly basis and heads of departments review their staffing level against current demand to highlight where outstanding incidents maybe increasing. Audit confirmed that a specific Managing Demand Action Plan is in place where agreed actions are tracked to confirm they are completed.</p>
<p>The appointments which involve a domestic abuse incident are booked for a two-hour slot, which means that although this gives sufficient time to conduct an initial investigation, it means that there is sometimes a lack of resources to cover other appointments (Reference Page 39, Item 42)</p>	<p>The response to this point reflects the observation and also comments made during the inspection 'Hot debrief'</p> <p>Nottinghamshire Police continues to make use of scheduled appointments to respond to the needs of victims of domestic abuse and a 2 hour slot provides sufficient time for an officer to attend and make relevant enquires. Officers attending these incidents are trained to provide a response in line with force policy.</p> <p>The number of diary appointments available is regularly reviewed by contact management and the Scheduled Appointments Inspector</p>	<p>The Force carried out a review of its scheduled appointments and found that they believed a 2 hour slot was still required to give sufficient time to conduct investigations into the domestic abuse incidents.</p> <p>Lack of resources are managed through the Daily Management Briefing, see the audit finding recorded above, where outstanding DV incidents are reviewed and resources allocated where required.</p>

<p>In this inspection, we found the backlog had been considerably reduced, but there were <b>171 DASH forms still awaiting</b> secondary assessment by domestic abuse specialists.</p> <p>We found that only those cases involving victims at high risk are thoroughly assessed and there is no escalation process in terms of repeat victimisation (Reference Page 40, Item 49)</p>	<p>The influx of additional resource into this area of business has enabled the Domestic Abuse Support Unit to completely clear this backlog.</p> <p>The issue described is not whether the DASH form had been completed and initially assessed and graded by the attending Officer. This relates to the “backlog” within the unit re-assessing the DASH forms. The backlog was caused by a lack of resourcing which has now been addressed and the team are now established.</p>	<p>Audit confirmed that the DASU Team that handles the DASH forms has been further resourced, they have also implemented a monitoring system so twice a day management have a clear view of the number of outstanding forms and can allocate resources to ensure backlogs are managed in a timely manner.</p> <p>Audit confirmed that management have an automated reporting system to highlight any potential repeat victims and these are reviewed on a monthly basis and risk escalated where necessary.</p>
<p>However, there is <b>inconsistency across the force area</b> in how the processes work and the type of information shared between the multi-agency safeguarding hub (<b>MASH</b>) located in the county area, involving Nottinghamshire County Council and the domestic abuse referral team (DART), covered by Nottingham City Council. For example, in the MASH there are daily ‘Encompass’ meetings to review all high and medium-risk domestic abuse incidents where a child lives within the family unit and a referral is made to the education authorities. This allows for the early exchange of information and a safeguarding function with schools. There is no equivalent process in the city, and, in addition, city-based partner organisations which were co-located with police have moved out to other premises. This reduces the opportunities for sharing information and working together (Reference Page 41, Item 51).</p>	<p>The City Encompass meeting has been running since November 2016, and mirrors the arrangements that already existed in the County. A Daily meeting now takes place, each morning with both City and County in the same way.</p> <p>Agreement has been reached with partners in the city to establish a City MASH accommodation has been identified and agreed and final arrangements are being implemented around IT and data security arrangements that will enable the team to commence work together in the next few weeks.</p>	<p>A business case was put forward for the implementation of a Multi-Agency Safeguarding Hub (MASH) in the City in March 2017, and the unit was opened on 1<sup>st</sup> June 2017 and has since been visited by the HMIC during their last visit in June 2017.</p>
<p><b>National Report:</b> Figure 28: Rate of ‘Evidential difficulties: victim does not support action’ outcomes recorded in the 12 months to 30 June 2016 for domestic abuse-related offences. <b>Notts unable to provide this data. (Reference Page 45 Item 64).</b></p>	<p>Nottinghamshire Police is reviewing any data that it was unable to provide when requested for this inspection to ensure that it is able to respond to future data requests.</p>	<p>The Management Information Team, headed by Kate Hemstock, are responsible for providing HMIC with appropriate data sets. Audit were informed the process for collating data for the next inspection in Sept 17 is currently ongoing and at present the Force are on track to provide all data sets.</p>

<p>The force should ensure that officers and staff understand how children can be affected by domestic abuse....., and that there is a process to ensure they undertake safeguarding actions and make referrals to other organisations which have a role in safeguarding (Reference Page 9, Item 4)</p>	<p>Following the HMIC visit in September 2016, Public Protection conducted a further audit/review of our approach to children in the context of Domestic abuse. An action plan was then developed, which is RAG rated and designed specifically to further embed the “Voice of the Child “ in our response to Domestic abuse incidents.</p>	<p>The action plan included the production of bite size training videos that were rolled out to officers to increase understanding. These are available on the Intranet for officers and staff to view.</p> <p>It also includes how to place MARAC flags on Niche to refer cases to other organisations, and mentioned including other agencies to Encompass meetings to support families and children. The Domestic Abuse Procedure makes reference to the DASH Form Pathway and shows high risks needed to be referred to MASH, or Women’s Aid, IDVA or DART. The Operating Protocol for the Nottingham City MARAC clearly states that all High Risk evaluated cases should be forwarded to MARAC via the DART so procedure can be seen within the Police.</p> <p>A pre-programmed search of the Niche System is undertaken that shows all High Risk cases and is compared to the Case Logs created by the Administrators to confirm all cases have been referred. However this reconciliation process is not documented or recorded.</p>
<p>Moreover, repeated incident reports relating to domestic abuse but graded as standard risk would not receive any additional scrutiny or review by partner organisations. It is unclear whether children’s services would escalate any <b>child referrals within this context</b>, so it is therefore possible that nothing would be done to limit the effect on a child’s welfare in respect of exposure to on-going domestic abuse (Reference Page 41 Item 50).</p> <p>The force <b>does not refer all high-risk cases to multi-agency risk assessment conferences (MARACs)</b>. High risk domestic abuse victims are those who are at risk of murder or serious harm and the criteria differ between the county and city areas for those cases that will and will not be</p>	<p>Repeat victimisation is now identified through an automated search developed by MI for the Head of PP, and features in the monthly Operational Performance review.</p> <p>The review at OPR then triggers a “re-view” of repeats (at any level, including standard) by the DASU, who then determine whether or not the information needs to be shared.</p> <p>All County high risk cases are now referred to and considered by a Multiagency risk assessment conference on a weekly basis.</p>	<p>A monthly Operational Performance Review includes Management Information that highlights repeat victimisation and these are reviewed at this forum and they escalate based on level of risk where they feel it is appropriate to do so. There is an on-going Domestic Abuse Action Plan, which included the review of repeat victims. Audit observed the monthly report of repeat victims’ data that is produced and reviewed.</p> <p>There has been a recent agreement by the Force and City partners to resource a City MARAC that is able to meet more frequently and thus all high risk referrals are able to be reviewed.</p>



<p>considered. In this inspection we again saw that this triage process does not involve all partner organisations and is <b>contrary to national guidance.</b> <b>(Reference Page 41, Item 52)</b></p> <p>The force should improve the way it works with partner organisations to share information and safeguard victims of domestic abuse and their children, specifically in relation to addressing the backlog of cases that require further assessment and referral to other organisations (Reference Page 10 Item 5)</p> <p>The force should improve its approach to safeguarding victims of domestic abuse who are assessed as high risk. It should review the referral process to multi agency risk assessment conferences to ensure that victims of domestic abuse are not being placed at risk as a result (Reference Page 10, Item 6)</p>	<p>When we were inspected City Partners were unable to resource sufficient MARAC meetings for all high risk cases and so the following approach was being followed:</p> <p>Nottinghamshire Police is committed to running additional meetings to ensure that all High Risk Cases go to MARAC. This position was articulated by the Head of PP at the City MARAC Steering group on 11<sup>th</sup> April, 2017. – Where the proposal has been agreed.</p> <p>The current establishment for risk assessors within DASU is 8. For a number of reasons (including sickness and some challenges with recruitment), the team had been running with 4 assessors. Inevitably, this had meant an ever growing backlog in risk assessments, which hit its high point in and around the HMIC Inspection in September 2016, when the figure was 273. The resource position as of today (26th April 2017) is, 8 staff operating full time. The figure now reads 40-50 on a daily basis - which is approximately equal to one-days work. It is felt that now the team are up to full strength there is sufficient resilience to meet demand and this risk is constantly being monitored, not only in the daily PP management meeting but also on the force risk register.</p>	<p>The previous 'triage process' that had a pre meeting review of the high risks to reduce the number of referrals has been removed as all high risks will now be submitted.</p> <p>The MARAC has all partner organisations so the review of all high risk referrals will be in line with national guidance.</p> <p>The Daily Management Briefings are now reviewing all outstanding incidents of domestic abuse (see audit findings to the first action noted above).</p>
---	---	--



## A2 - Appendix 2 – Audit Information

Audit Control Schedule	
<b>Client contacts:</b>	Charlie Radford, OPCC Chief Financial Officer Chief Supt, Paul Winter DCI Leigh Saunders DCI Phil Davies Amanda Frogatt, Risk and Business Continuity Officer
<b>Internal Audit Team:</b>	David Hoose, Partner Brian Welch, Internal Audit Senior Manager Mark Lunn, Senior Auditor
<b>Finish on Site \ Exit Meeting:</b>	6 <sup>th</sup> July 2017
<b>Draft report issued:</b>	24 <sup>th</sup> July 2017
<b>Management responses received:</b>	25 <sup>th</sup> August 2017
<b>Final report issued:</b>	29 <sup>th</sup> August 2017

### Scope & Objectives

Our audit considered the following area objectives:

- The Force has effective and robust plans in place to address the issues raised in the PEEL report.
- The action plans specifically address the issues raised in the PEEL report.
- The plans have been approved and communicated, and there are effective processes in place to monitor their delivery.

The objectives of our audit were to evaluate the adequacy and effectiveness of the Force response to the observations highlighted in the HMIC PEEL report.

In giving this assessment it should be noted that assurance cannot be absolute. The most an Internal Audit Service can provide is reasonable assurance that there are no major weaknesses in the framework of internal control.

We are only able to provide an overall assessment on those aspects of the Force response and actions that we have tested or reviewed. Testing has been performed on a sample basis, and as a result our work does not provide absolute assurance that material error, loss or fraud does not exist.

## A3 - Statement of Responsibility

### **Status of our reports**

*We take responsibility to the Office of the Police & Crime Commissioner for Nottinghamshire and Nottinghamshire Police for this report which is prepared on the basis of the limitations set out below.*

*The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.*

*We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.*

*The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.*

*This report is confidential and must not be disclosed to any third party or reproduced in whole or in part without our prior written consent. To the fullest extent permitted by law Mazars LLP accepts no responsibility and disclaims all liability to any third party who purports to use or reply for any reason whatsoever on the Report, its contents, conclusions, any extract, reinterpretation amendment and/or modification by any third party is entirely at their own risk.*

*Registered office: Tower Bridge House, St Katharine's Way, London E1W 1DD, United Kingdom. Registered in England and Wales No 0C308299.*