



Enquiries to: Mrs J Head
Telephone: 01768 217734

Our reference: jh

29 March 2016

AGENDA

TO: THE MEMBERS OF THE EXECUTIVE BOARD

CUMBRIA POLICE & CRIME COMMISSIONER'S EXECUTIVE BOARD

A public meeting of the Police and Crime Commissioner's Executive Board will take place on **Wednesday 6th April 2016** in Conference Room 3, Police Headquarters, Carleton Hall, Penrith, at **10.00am**.

S Edwards
Chief Executive

COMMITTEE MEMBERSHIP

Police & Crime Commissioner - Mr Richard Rhodes (Chair)
OPCC Chief Executive - Mr Stuart Edwards
OPCC Chief Finance Officer - Mrs Ruth Hunter
Chief Constable - Mr Jerry Graham

AGENDA

PART 1 – ITEMS TO BE CONSIDERED IN THE PRESENCE OF THE PRESS AND PUBLIC

1. APOLOGIES FOR ABSENCE

2. URGENT BUSINESS AND EXCLUSION OF PRESS AND PUBLIC

To consider (i) any urgent items of business and (ii) whether the press and public should be excluded from the Meeting during consideration of any Agenda item where there is likely disclosure of information exempt under s.100A(4) and Part I Schedule A of the Local Government Act 1972 and the public interest in not disclosing outweighs any public interest in disclosure.

3. DISCLOSURE OF PERSONAL INTERESTS

Members are invited to disclose any personal/prejudicial interest which they may have in any of the items on the Agenda. If the personal interest is a prejudicial interest, then the individual member should not participate in a discussion of the matter and must withdraw from the meeting room unless a dispensation has previously been obtained.

4. MINUTES OF MEETING

To receive and approve the minutes of the meeting held on the 17th March 2016 (copy enclosed)

5. QUESTIONS FROM THE PUBLIC

An opportunity (not exceeding 20 minutes) to deal with any questions which have been provided in writing within at least three clear working days before the meeting date to the Chief Executive.

6. ARRANGEMENTS FOR GOVERNANCE 2016-17 – Decision 018/2016

The Commissioner is asked to approve a framework for governance arrangements and the arrangements for the review of that framework.

6.1 CODE OF CORPORATE GOVERNANCE 2016-17 (for approval)

6.2 RISK MANAGEMENT STRATEGY 2016-17 (for approval)

6.3 INTERNAL AUDIT PLAN & INTERNAL AUDIT CHARTER 2016-17 (for approval)

6.4 JOINT AUDIT PLAN FOR POLICE AND CRIME COMMISSIONER FOR CUMBRIA AND THE CHIEF CONSTABLE FOR CUMBRIA CONSTABULARY (to receive and note)

6.5 ANNUAL AUDIT LETTER (to receive and note)

7. HMIC

To receive and note actions taken by the Constabulary following recent HMIC inspections

7.1 PEEL EFFECTIVENESS REPORT (copy enclosed)

7.2 FIREARMS REPORT (copy enclosed)

7.3 CUSTODY REPORT (copy enclosed)

7.4 VULNERABLE LOCALITIES INDEX (copy enclosed)

8. OPCC OFFICE OF PUBLIC ENGAGEMENT – update report

To receive and note an OPCC report on the Office of Public Engagement activities (copy enclosed)

9. OPCC – ICV SCHEME AND ANIMAL WELFARE ANNUAL REPORT

To receive and note the Independent Custody Visiting Scheme Annual report (copy enclosed)

10. ETHICS & INTEGRITY PANEL REPORT

To receive and note the Ethics and Integrity Panel quarterly report (copy enclosed)



Agenda Item No 04

**CUMBRIA POLICE & CRIME COMMISSIONER
EXECUTIVE BOARD**

Minutes of a Meeting of the Executive Board held on
Thursday 17 March 2016 in Conference Room 2, Police Headquarters,
Carleton Hall, Penrith, at 10.00am

PRESENT

Police & Crime Commissioner - Mr Richard Rhodes (Chair)
Chief Constable - Mr Jerry Graham
OPCC Chief Executive - Mr Stuart Edwards

Also present:

Deputy Chief Constable (Michelle Skeer)
Assistant Chief Constable (Darren Martland)
OPCC Head of Communications & Business Services (Gill Shearer)
OPCC Head of Partnerships and Commissioning (Vivian Stafford)
OPCC Governance Manager (Joanne Head) – taking minutes
Constabulary Marketing & Communications Manager (Helen Lacey)

Her Majesty's Inspector of Constabulary – Robbie Slater

PART 1 – ITEMS CONSIDERED IN THE PRESENCE OF THE PRESS AND PUBLIC

421. APOLOGIES FOR ABSENCE

Apologies for absence were received from Mrs Ruth Hunter, OPCC Chief Finance Officer.

422. URGENT BUSINESS AND EXCLUSION OF THE PRESS AND PUBLIC

There were no items of urgent business to be considered by the Board.

423. DISCLOSURE OF PERSONAL INTERESTS

There were no disclosures of any personal interest relating to any item on the Agenda.



424. MINUTES OF MEETING

The Chair presented the minutes of the Executive Board Meetings held on 16th February 2016 and 24th February 2016 which had previously been circulated with the agenda. The minutes were agreed as an accurate record and signed by the Chair.

At the meeting on the 24th February 2016 the Constabulary had presented the Fleet Strategy for the Commissioner to approve. It was unclear whether the document presented had been the most up to date strategy. The Commissioner asked that the Director of Corporate Support provide him with the most up to date strategy. The Deputy Chief Constable advised she would progress this action.

RESOLVED, that, the

- (i) Minutes of the meetings of the Executive Board held on 16th February and 24th February 2016 be confirmed as a correct record and signed by the Chair;
- (ii) Director of Corporate Support provide the Commissioner with a copy of the most up to date Fleet Strategy.

425. QUESTIONS FROM MEMBERS OF THE PUBLIC

No questions had been received from members of the public prior to the meeting.

426. CUMBRIA CONSTABULARY PERFORMANCE REPORT – Performance to end January 2016

ACC Martland presented a report which detailed Constabulary performance for a rolling 12 month period to the end of January 2016. For the year to date the force was 6% above last years' figures, 4% above target and 6% above the rest of the UK forces.

All crime had seen an increase of 7% of which 13% had a domestic violence element. ACC Martland advised that there had been a seasonal increase however this had stabilised over the last few months. The increase in reported crimes was attributed to a greater proportion of reports of crime being recorded during the year following improved compliance with national recording standards by police forces. The Constabulary was now required to record all offences immediately whereas previously they may have been able to deal with matters informally where appropriate. The Commissioner asked whether this had resulted in a change in public attitudes. He was advised that the Constabulary were taking a number of steps regarding crime such as PCSO's in schools to provide education to young people. There was also an increased focus on vulnerability and identifying what the issues and threats were to communities.



The Deputy Chief Constable advised that with the new Command and Control System officers would assess vulnerability when dealing with a call and would provide the correct response for each incident.

Violence against the person had also seen an increase of 17.6%, although it was noted that the majority of increased instances had occurred with no or only minor injuries. The number of harassment offences had increased by 26% and made up 20% of the total increase in violence against the person. Again this increase was attributed to the changes in recording practices by the Constabulary. There were no links with Anti-Social Behaviour, more issues were occurring on-line with a 14% increase of those with a domestic violence marker.

Criminal Damage had seen an 8% increase and the Commissioner asked whether any patterns or trends had been identified. ACC Martland gave assurance that the Constabulary were monitoring the increase to identify any possible trends, however to date none had been identified and there had been no targeting of vulnerable people or communities. He advised that in many instances these were reported by members of the public to simply advise the police of the matter and receive a crime recording number. Any spikes or trends would be picked up at the daily tasking meetings, with resources deployed and appropriate action taken.

There had been a 5% increase in the number of robberies reported. ACC Martland advised that this could be as simple as a mobile telephone being stolen from an individual which would have to be recorded as a robbery. Recently there had been two armed robberies however the offenders had been traced, arrested and charged with the relevant offences. Compared with other forces against per 1,000 population Cumbria was the second lowest in the country.

Rape and Other Sexual Offences had seen an increase of 43% and 15% respectively with many of these cases relating to historical offences. A more detailed report would be discussed later in the agenda. ACC Martland advised that the Constabulary had increased the number of staff within its public protection unit, provided further training for officers and staff, were making better use of The Hub and The Bridgeway; and having local and regional meetings with the Crown Prosecution Service to obtain consistency.

It was noted that the conviction rate at court for domestic abuse offences had seen an 83% conviction rate which was attributed to dealing with the matter as quickly as possible. There had been a decline in the number of repeat offences which had been as a result of support mechanisms with a view to preventing further offences. The Commissioner reiterated the importance of working with partners and spoke about the agencies which the Office of the Police and Crime Commissioner had provided funding to.

ACC Martland reported that the Highways Agency had carried out researched relating to the A66 and the A69 roads in Cumbria. Options to upgrade these roads were being considered, with a decision anticipated to be made by October 2016. ACC Martland would provide a copy of the report to the Commissioner.

RESOLVED, that

- (i) the report be noted; and
- (ii) a copy of the Highways Agency report to be provided to the Commissioner.

427. CONSTABULARY EQUALITY & DIVERSITY REPORT – Update March 2016

The Deputy Chief Constable presented at report which outlined activities undertaken by the Constabulary throughout the year, building confidence by the public to engage with the Constabulary and report matters. The Constabulary aspired to increase the number of reported hate crimes by at least 7% on the previous year.

The Constabulary had recently re-structured the Strategic IAG for it to consider more strategic issues affect the Constabulary. New terms of reference for the group were currently being drawn up and this group would be utilised to assist with the increased reporting of issues. The Constabulary aspired to reach diverse communities by using a number of the diversity strands. These included recruiting from these communities, raising awareness, encouraging reporting, having not only third party centres but the ability to report on-line.

Safe places had been introduced in many town centres where vulnerable people could go to for assistance.

Following a discussion, the report was noted.

RESOLVED, that the report be noted.

428. CONSTABULARY STOP & SEARCH ANNUAL REPORT

Her Majesty's Inspectorate of Constabulary (HMIC) had inspected the Constabulary in November 2015 in relation to Stop Search as part of the Legitimacy Inspection element of the PEEL regime, with Cumbria being recognised as requiring improvement. Subsequently the Constabulary had provided training to all officers and staff using case studies to reiterate the issues identified by HMIC. Quality assurance of all forms was now undertaken by Sergeants ensuring the grounds for stopping and searching someone were clearly defined.

A peer review had been undertaken by the Met at the request of the Constabulary who had made 2 recommendations which were being actioned. This area of business was monitored on a weekly basis by TPA's with the Operations Board monitoring it on a monthly basis.

The Ethics and Integrity Panel had carried out a dip sample of stop search forms and had raised their concerns regarding the documenting of grounds for stop and search on the forms. This information had been fed back to the Constabulary and the recommendations would be used to amend forcewide procedures. The Panel were to again review a sample of records in August which would enable direct comparisons to be made to previous forms. Following discussion it was agreed that the Ethics and Integrity Panel would carry out this review, prior to



the Constabulary speaking with HMIC, and to invite them to review the work undertaken by the Constabulary in relation to Stop Search.

RESOLVED, that the

- (i) report be noted; and
- (ii) Ethics and Integrity Panel review a sample of Stop Search forms in August 2016.

429. CONSTABULARY BUSINESS CONTINUITY PLAN UPDATE

In 2015 Internal Audit had reviewed the Constabulary's business continuity arrangements and as a result had made five recommendations. These recommendations had been actioned by the Constabulary the details of which were contained within the report presented to the meeting. A new policy and strategy had been developed and were now in place with the strategy being reviewed on a six monthly basis.

The Commissioner asked whether the adverse weather conditions in December 2015 had had any impact on the Constabulary's business continuity plan. ACC Martland advised that the plan had held up well, 24 hour coverage was maintained with Gold Command being in place for a week.

The Constabulary had implemented the recovery of Kendal and Workington Police stations during the acute stage of the adverse weather in December with custody provision being temporarily provided at Barrow and Carlisle. Control room back-up facilities had been made available at Durranshill, Carlisle if they were required.

ACC Martland advised that following this extended period of Gold Command involving a large number of outside agencies and partnerships it had been recognised that in the longer term Police Headquarters was not fit for purpose in terms of the needs of Gold Command. The Commissioner had recently agreed the provision of a Strategic Command Centre on the Police Headquarters site to address the identified shortcomings. This project, jointly funded with partners, would ensure Cumbria was well placed to deal with future emergencies.

Following a discussion, the report was noted.

RESOLVED, that the report be noted.

430. OPCC BUSINESS CONTINUITY PLAN UPDATE

The OPCC Chief Executive advised that during the development of an updated Business Continuity Plan for the OPCC an Internal Audit review had taken place. He presented a report which highlighted the findings of the Internal Audit and the work carried out following the identified recommendations.



All the recommendation had now been addressed; a policy and plan had been developed and were in place which had been fully tested. The Joint Audit and Standards Committee had signed off the action plan and the OPCC would continue to monitor the plan's robustness.

Following a discussion, the report was noted.

RESOLVED, that the report be noted.

431. DECISION 016-2016 – POLICE AND CRIME COMMISSIONER'S ANNUAL REPORT

The Police and Crime Commissioner is required to produce an Annual Report every financial year identifying how he has carried out his statutory functions, including setting the budget, developing a Police and Crime Plan and how he has held the Chief Constable to account.

The report was a culmination of work undertaken by the Commissioner and the OPCC over the past 12 months and 3½ years. It would be published at the beginning of May and it was noted that it would contain up to date performance and financial information at that time.

The Commissioner wished to thank the OPCC Engagement Officer for all her hard work in producing the Annual Report and the support of all the staff within the OPCC to deliver against his priorities.

RESOLVED, that, the report be noted.

432. CONSTABULARY REPORT ON CRIME OUTCOMES

ACC Martland presented a report which outlined outcomes of reported crimes for the period 1 February 2015 to 31 January 2016. Over 89% of offences recorded by the Constabulary had been assigned an outcome with the remaining crimes still being under investigation. Of those recorded crimes 18.3% had resulted in charge or summons which was higher than the national average of 14%. Table two within the report detailed the outcome for all offences recorded within the reporting period.

ACC Martland advised that the Constabulary were required to crime incidents within 24 hours of reporting, however Cumbria carried out this function immediately which meant that they could not investigate prior to the recording or change the offence. Officers within the Control Room had received training and Sergeants had been trained to a higher level to enable them to record crimes. The Professional Discretion Framework had been introduced which supported officers and staff in assessing risk and threat.

In response to a question from the Commissioner on who oversees the Constabulary's recording of Crime, he was advised that the Crime Management Unit review and sign off and ensure compliance.

Following a discussion, the report was noted.

RESOLVED, that, the report be noted.

433. CONSTABULARY RAPE & SEXUAL OFFENCES OUTCOMES REPORT

A report had been prepared by the Constabulary which detailed outcomes in relation to Rape and other sexual offences for the period 1 April to 30 December 2015. Of the 201 rape offences recorded during the reporting period 50% related to children between the ages of 13 years and 18 years. Eighty six were historical cases, ie over 12 months, with 20 relating to adults and 66 against young people. It was noted that 10 people had been charged with offences out of the 201 reported incidents. Offences of rape and other sexual offences did take a long time to investigate and some were challenging particularly those of a historical nature in being able to secure evidence. In all cases advice would be provided by the Crown Prosecution Service (CPS) prior to charging an offender.

The Commissioner asked whether there was any regional collaboration in relation to such offences and what resources were available within the Constabulary. ACC Martland advised that there was a regional approach to dealing with Rape and other sexual offences such as working closing with Lancashire and a national link with the National Crime Agency (NCA). Increased staffing resources had been provided within force along with accredited training especially with regard to those officers who initially deal with such matters.

Following discussion the report was noted.

RESOLVED, that, the report be noted.

434. CCTV REPORT

In 2015 the Commissioner launched a county-wide CCTV system comprising of 53 cameras which are centrally monitored from police headquarters. The system has the potential to be expanded in a second phase by a further 31 cameras up to a total of 84 cameras.

The Office of the Police and Crime Commissioner had contacted all district councils, the Cumbria Association of Local Councils (CALC) and a number of parish/town councils who had expressed an interest in having additional cameras. At the time of the meeting the OPCC had received one initial expression of interest. Such organisations would be required to identify relevant locations with the design, costing and implementation costs being borne by the requesting council. The Constabulary would need to become involved in discussions regarding the monitoring of any new cameras.

The Commissioner stated that it would be important to co-ordinate any additional cameras to the system should more expressions of interest be received. He complimented the



Constabulary on the work they had undertaken in installing the initial phase and its successful use in fighting crime.

Following discussion the report was noted.

RESOLVED, that, the report be noted.

Meeting ended at 12.00 pm

Signed: _____

Date: _____

DRAFT



Agenda Item No 06

Office of the Police & Crime Commissioner

REQUEST FOR POLICE & CRIME COMMISSIONER DECISION - (N° 018 / 2016)

TITLE: Arrangements For Governance 2016-17

Executive Summary: (Précis not more than 100 words)

The Commissioner approves a framework for governance on an annual basis and puts in place arrangements for the review of that framework. The governance framework is set out in a Code of Corporate Governance. It is supported by a specific strategy for managing risks. The arrangements for internal audit and external audit support the annual review of that framework and provide independent assessment of the effectiveness of internal controls, governance and risk management. This item on the agenda asks the Commissioner to approve the Code of Corporate Governance, the Risk Management Strategy and the Internal Audit Plan and Charter for 2016-17. The Commissioner is also asked to note the External Auditors Audit Plan 2016-17 and Annual Audit Letter 2015.

Recommendation:

It is recommended that the Commissioner:

- (a) Approves the Code of Corporate Governance for 2016-17, delegating to the Chief Executive, where relevant, any minor amendments arising from the introduction of police specific guidance due during 2016-17 and any recommendations arising from the review of the Code by the Joint Audit and Standards Committee**
- (b) Approves the Risk Management Strategy 2016-17**
- (c) Approves the Internal Audit Plan & Internal Audit Charter for 2016-17**
- (d) Receives and notes the plans of the External Auditors as set out in their Joint Audit Plan for the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary**
- (e) Receives and notes the External Auditors Annual Audit Letter**

Police & Crime Commissioner

I confirm that I have considered whether or not I have any personal or prejudicial in this matter and take the proposed decision in compliance with the Code of Conduct for Cumbria Police & Crime Commissioner. Any such interests are recorded below.

I hereby approve/do not approve the recommendation(s) above

Police & Crime Commissioner / Chief Executive (delete as appropriate)

Signature: **Date:**

PART 1 – NON CONFIDENTIAL FACTS AND ADVICE TO THE PCC

1. Introduction & Background

The Police and Crime Commissioner is responsible for ensuring that business is conducted in accordance with the relevant statutory and regulatory frameworks and the proper standards that apply to the Office. In fulfilling this responsibility the Commissioner must put in place proper arrangement for governance, including risk management and the arrangements for ensuring the delivery of the functions and duties of the office. These arrangements include a Code of Corporate Governance that sets out the framework for governance and a Risk Management Strategy setting out the arrangements for managing risk. The Code of Corporate Governance has been developed to comply with the Chartered Institute of Public Finance and Accountancy 2016-17 Good Governance Framework. The Risk Management Strategy has been substantially revised during 2016-17 to reflect development work that has sought to continually improve our arrangements for managing risks.

These arrangements for governance are supported by an Internal Audit Plan. The Plan is risk based and developed in consultation with Chief Officers and senior management within the OPCC and Constabulary. It aims to provide assurance on the arrangements within the Commissioner’s office and supports arrangements for holding the Chief Constable to account. The Audit Plan is supported by an Internal Audit Charter, in compliance with Public Sector Internal Audit Standards (PSIAS) that ensure that the arrangements for Audit operate on the basis of best practice.

The External Auditors prepare an annual programme of work, the External Audit Plan, that provides additional assurance and culminates in the presentation of an annual opinion in respect of the financial statements and a value for money conclusion. The External Auditors also present an Annual Audit Letter setting out the key findings from their audit of the prior financial year. The External Auditors are independent and determine the scope of work necessary to form their statutory judgements. The External Auditors reports are presented to the Commissioner for receipt and note as part of the arrangements for Governance.

2. Issues for Consideration

The Code of Corporate Governance 2016-2017: The Code of Corporate Governance is a new code (rather than an update of the 2015-16 Code). The new Code applies the standards set out in the consultation by CIPFA during 2015-16 on a new Framework for Good Governance. The CIPFA good governance framework is the best practice standard for Public Sector governance. The new CIPFA framework is effective from April 2016 and for this reason the Code of Corporate Governance is presented to the Commissioner for approval at the April meeting of the Executive Board. The new governance framework is based on seven principles, as set out in the proposed Code and has a much broader focus on delivering value for money, including outcomes and demonstrating effective performance, often working in partnership to achieve this.

Whilst the CIPFA good governance framework applies to the 2016-17 financial year, the Institute has yet to finalise the documents it will issue to publish the framework. In addition there will be specific guidance on application of that framework to Police. At the date of preparing this report there has not been any firm guidelines on the timing of that guidance. In the absence of these publications the proposed Code of Corporate Governance has been prepared on the basis of the CIPFA consultation document in order that it can be put in place at the start of the 2016-17 financial year. Also, there is not expected to be any substantial differences between the governance framework that has been presented by CIPFA for consultation and the final governance standard. Once the CIPFA documents have been published they will be reviewed to ensure our arrangements remain compliant. The Code will also be subject to review by the Joint Audit and Standards Committee at their earliest available meeting in 2016-17, which is being held on May 3rd. On this basis it is recommended that responsibility is delegated to the Chief Executive to undertake a high level review of the Code against the published Good Governance Framework as it becomes available. It is also recommended that the Chief Executive is delegated to make any minor amendments to the Code, should they be required, following that review and any recommendations arising from the meeting of the Joint Audit and Standards Committee. Where any changes are considered to be necessary that are more than minor, an updated Code will be presented for formal approval by the Commissioner.

The Risk Management Strategy 2016-2017: The Risk Management Strategy has been subject to review by the Joint Audit and Standards Committee. The Committee and the Committee's lead member for risk have been supportive in the changes to the arrangements for risk that have been made to the proposed Strategy for 2016-17. This has included changes to the way risks are assessed, scored and recorded to make risk management processes more dynamic and integral to the operation of the business and achievement of objectives. Changes have been made with professional support from the Chartered Institute of Public Finance and Accountancy.

The Internal Audit Plan and the Internal Audit Charter 2016-2017: The Internal Audit Plan and the Internal Audit Charter have been subject to review by the Joint Audit and Standards Committee. The Committee has not made any recommendations to the Commissioner in respect of the Plan and Charter. The Plan provides for a higher number of days of audit activity during 2016-17, primarily in respect of Constabulary requirements for assurance in respect of areas of operational risk.

External Audit Plans 2015-16 Financial Year and the Annual Audit Letter 2015: The Joint Audit and Standards Committee have received for review the Annual Audit Plan of the External Auditors for the 2015-16 financial year and the Annual Audit Letter 2015, noting the Auditor's conclusions in respect of their audit of the 2014-15 financial year. The Committee were pleased to note the positive comments made by the External Auditors in respect of the arrangements in place for the financial statements and the positive opinion on value for money in respect of the Police and Crime Commissioner and the Chief Constable. The Commissioner may wish to note the external auditor's intention, for the audit of the 2015-16 Statement of Accounts, to sign the financial statements and issue a certificate of closure of the audits by July 2016, 2 years ahead of the statutory requirement to meet this deadline.

3. Implications

(List and include views of all those consulted, whether they agree or disagree and why)

- 3.1. Financial: The work of External Audit is subject to an audit fee set out on page 18 of the External Auditor's Audit Plan. Fee levels are set nationally. The work of internal audit is charged on a daily rate as part of the arrangements for shared services through the County Council. The Internal Audit Plan provides for 274 days audit including 15 days carried forward from 2015-16 as set out on page 3 and 4 of the report.
- 3.2. Legal: The arrangements set out in the accompanying documents support the Commissioning in meeting his statutory and regulatory duties.

- 3.3. Risk: The arrangements set out in the accompany documents support the Commissioner in effectively managing risk and in holding to account the Chief Constable for the management of Constabulary risks.
- 3.4. HR / Equality: The Code of Corporate Governance sets out the arrangements in place in respect of HR and managing the arrangements for equality including through consultation and engagement and in respect of decision making.
- 3.5. I.T.: n/a
- 3.6. Procurement: The Code of Corporate Governance sets out the arrangements in place in respect of procurement.
- 3.7. Victims: The Code of Corporate Governance sets out the arrangements in place in respect of victims.

4. Backgrounds / supporting papers

- a) The Code of Corporate Governance 2016-2017
- b) Risk management Strategy 2016-2017
- c) Internal Audit Plan and Audit Charter 2016-2017
- d) Joint Audit Plan for the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary
- e) External Auditors Annual Audit Letter 2015

<p>Public Access to Information</p> <p>Information in this form is subject to the Freedom of Information Act 2000 (FOIA) and other legislation. Part 1 of this form will be made available on the PCC website within 3 working days of approval. Any facts/advice/recommendations that should not be made automatically available on request should not be included in Part 1 but instead on the separate Part 2 form. Deferment is only applicable where release before that date would not compromise the implementation of the decision being approved.</p>
<p>Is the publication of this form to be deferred? NO</p> <p>If yes, for what reason:</p> <p>Until what date (if known):</p>
<p>Is there a Part 2 form - NO</p> <p>(If Yes, please ensure Part 2 form is completed prior to submission)</p>

ORIGINATING OFFICER DECLARATION:

I confirm that this report has been considered by the Chief Officer Group and that relevant

financial, legal and equalities advice has been taken into account in the preparation of this report.

Signed: **Date:**

OFFICER APPROVAL

Chief Executive / Deputy Chief Executive (delete as appropriate)

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Police and Crime Commissioner / Chief Executive (delete as appropriate).

Signature: **Date:**

Media Strategy

The decision taken by the Police & Crime Commissioner may require a press announcement or media strategy.

Will a press release be required following the decision being considered? NO

If yes, has a media strategy been formulated? YES / NO

Is the media strategy attached? YES / NO

What is the proposed date of the press release:



Cumbria Office of the Police and Crime Commissioner
Code of Corporate Governance 2016-2017

Foreword



Welcome and thank you for taking the time to read the Police and Crime Commissioner for Cumbria's Code of Corporate Governance. I am pleased to introduce this Code, which sets out the Commissioner's commitment to continue to uphold the highest possible standards of good governance. This document clearly demonstrates his drive to ensure that this is in place. Good governance is about how the Commissioner will ensure that he is doing the right things, in the right way, for the communities he serves, in a timely, inclusive, open, honest and accountable way.

The Code provides clarity about how the Commissioner and Chief Constable will govern their organisations both jointly and separately, in accordance with their statutory responsibilities. It will do this by highlighting the key enablers for ensuring good governance. The Code sets out how the organisations will govern, using the seven good governance principles as the structure for setting out the statutory framework and local arrangements.

Robust governance enables the Commissioner to pursue his vision effectively as well as underpinning that vision with mechanisms for control and management of risk.

A handwritten signature in black ink, appearing to read 'Stuart Edwards' in a cursive, slightly stylized script.

Stuart Edwards

Chief Executive and Monitoring Officer

Office of the Police and Crime Commissioner

Introduction

The Police Reform and Social Responsibility Act 2011 (PR&SRA) established Police and Crime Commissioners as elected officials with statutory functions and responsibilities for Policing and Crime within their area. Those responsibilities include: setting the strategic direction and objectives for policing and crime and disorder reduction in their area; maintaining the police force; and holding the Chief Constable to account. Police and Crime Commissioners also have wider responsibility for community safety, enhancing criminal justice and supporting victims.

The statutory and regulatory framework setting out the responsibilities, powers and duties of Police and Crime Commissioners is continually developing. The PR&SRA is supported by the Policing Protocol Order 2011, the Home Office Strategic Policing Requirement 2015 and the Home Office Financial Management Code of Practice 2013. The Anti-Social Behaviour, Crime and Policing Act 2014 has developed and conferred further powers in respect of the wider responsibilities of Police and Crime Commissioners. These powers will be extended through the draft legislation in the current Policing and Crime Bill.

The Police and Crime Commissioner for Cumbria (the Commissioner) is responsible for ensuring that business is conducted in accordance with this statutory and regulatory framework and in accordance with proper standards. This includes ensuring that public money is safeguarded, properly accounted for and used economically, efficiently and effectively. In fulfilling this overall responsibility, the Commissioner is responsible for putting in place proper arrangements for governance, including risk management and the arrangements for ensuring the delivery of the functions and duties of his office.

In doing this, the Commissioner approves and adopts annually this Code of Corporate Governance, 'The Code'. The Code gives clarity to the way the Commissioner governs and sets out the frameworks that are in place to support the overall arrangements for the Cumbria Office of the Police and Crime Commissioner (COPCC). The Code is based on the core principles of governance set out within the CIPFA/SOLACE Delivering Good Governance in Local Government Framework 2016. The Code is appended with a schematic that sets out diagrammatically all the key elements of the governance framework.

On an annual basis the Commissioner will produce an Annual Governance Statement (AGS). The AGS reviews the effectiveness of the arrangements for governance and sets out how this Code of Corporate Governance has been complied with.

The Code of Corporate Governance

This code of corporate governance sets out how the Police and Crime Commissioner will govern. It is based on the seven good governance core principles highlighted by the CIPFA/SOLACE Delivering Good Governance in Local Government Framework 2016, and supported by the Nolan Principles of Public Life.

This Code uses those principles of governance as the structure for setting out the statutory framework and local arrangements that are in place to achieve them. The seven good governance principles are:

- Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- Principle B: Ensuring openness and comprehensive stakeholder engagement
- Principle C: Defining outcomes in terms of sustainable economic, social, and environmental benefits
- Principle D: Determining the interventions necessary to optimize the achievement of the intended outcomes
- Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it
- Principle F: Managing risks and performance through robust internal control and strong public financial management
- Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability

NOLAN PRINCIPLES OF PUBLIC LIFE

SELFLESSNESS: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.

HONESTY: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP: Holders of public office should promote and support these principles by leadership and example.

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

Police and Crime Commissioners are accountable not only for how much they spend, but also for how they use the resources under their stewardship. This includes accountability for outputs, both positive and negative, and for the outcomes they have achieved. In addition, they have an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. It is essential that, as a whole, they can demonstrate the appropriateness of all their actions and have mechanisms in place to encourage and enforce adherence to ethical values and to respect the rule of law.

Business Code of Conduct: Staff shall:

Maintain the highest possible standards of probity in all commercial relationships;

Reject business practice which might reasonably be deemed improper and never use authority for personal gain;

Enhance the proficiency and stature of the organisation by acquiring and maintaining technical knowledge and the highest standards of behaviour;

Ensure the highest possible standards of professional competence, including technical and commercial knowledge;

Optimise the use of resources to provide the maximum benefit to the organisation.

INTEGRITY: *Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.*

Ethics and Integrity

The arrangements for governance within the Office of the Police and Crime Commissioner are based on a culture of ethics, integrity and acting in the public interest. This is demonstrated and communicated through a number of policies and codes that set out the standards of conduct and personal behaviour expected in the Commissioner's office. Specifically:

- A Code of Conduct commits to the Nolan Principles of Public Life. The Code sets out commitments with regard to how people will be treated, the use of resources, disclosure and conflicts of interest, disclosure of information and transparency.
- A Code of Ethics developed by the Association of Police and Crime Commissioners (APCC) has also been adopted by the Commissioner. It sets out how the Commissioner

has agreed to abide by the seven standards of conduct recognised as the Nolan Principles. This Ethical Framework allows transparency in all areas of work of the Police and Crime Commissioner. These principles encompass the Commissioner's work locally and whilst representing Cumbria in national forums. The principles are listed in the Code of Ethics with examples of how these are achieved.

- The Commissioner's arrangements for anti-fraud and corruption make clear the duty everyone has with regard to their own conduct and those of others. The arrangements incorporate an anti-fraud and corruption policy and plan covering the culture expected within the organisation and provide contact information for confidential reporting (whistleblowing).

- Anti-fraud and corruption procedures cover arrangements for integrity in respect of gifts and hospitality, completion of a register of interests, supplier contact and declarations of related party transactions. These ensure staff avoid being engaged in any activity where an actual or perceived conflict may exist and that there is transparency in respect of any personal or business relationships. Staff are reminded on a monthly basis of the need to make declarations.

- The Office of Cumbria Police & Crime Commissioner is responsible for investigating complaints about the Chief Constable, any appointed Deputy Commissioner, the Office of Cumbria Police & Crime Commissioner's own staff and Independent Custody Visitors. A formal process exists for dealing with complaints. The arrangements are clearly set out, including the role of the Police and Crime Panel, on the 'contact us' section within the Commissioner's website.

The protocol for managing complaints is set out in the Commissioner's complaints Policy and reinforces the commitment to upholding the highest ethical standards.

- Complaints against the Police & Crime Commissioner are referred by the Commissioner's Monitoring Officer to Cumbria County Council's Monitoring Officer who investigates the complaints and then seeks to either resolve them locally with the complainant, refers them to the Police and Crime Panel or the Independent Police Complaints Commission.

- The Commissioner's Procurement Regulations incorporate a Business Code of Conduct, re-enforcing the integrity requirements within the anti-fraud and corruption policy in the context of procurement activity.

- Financial Regulations make arrangements for the proper administration of financial affairs. They also seek to reinforce the standards of conduct in public life, particularly the need for openness, accountability and integrity.

- Grant regulations are based on a framework that provides minimum standards and terms and conditions for the grant award process that seek to ensure grants are awarded within the public interest.

- The Commissioner and all staff are required to sign up to an anti-discrimination Code that sets out values and standards with regard to the prevention of any kind of discrimination.

All policies and codes are reviewed on a cyclical basis to ensure they are operating effectively. Independent external assurance is provided through the work of an Ethics and Integrity Panel

and Joint Audit and Standards Committee. The purpose of the Panel is to promote and influence professional ethics in all aspects of policing and within both organisations. It provides scrutiny and review in respect of the arrangements for codes of conduct, integrity and complaints. It also provides assurance to the public that any issues or concerns are highlighted and monitored. The Joint Audit and Standards Committee has responsibility for standards matters covering hearings and determining appeals in relation to the Commissioners personnel policies and decisions of the Chief Executive. The Committee also provides scrutiny and review in respect of the Commissioner's arrangements for anti-fraud and corruption and financial, procurement and grant regulations. Agendas and papers are available to the public on the Commissioner's website to aid transparency.

The leadership values for the organisation have been developed by our staff to support good governance and advocate high standards of integrity and ethical behaviour. They are set out in the Police and Crime Plan and our Corporate Plan. All staff within the OPCC have been appointed following open and transparent appointment processes. Following appointment staff commit to the various codes of conduct and ethical standards that are in place for the OPCC. All staff also undertake a structured induction process arranged by the Governance and Business Services Manager.

Respecting the Rule of Law

The Chief Executive is the Commissioner's Monitoring Officer with responsibility for ensuring that the Commissioner and staff of the Office of

Our Values

We are a single team with a culture of trust and confidence

We develop the capacity and capability of our office to be effective and recognise high performance

We have empowered staff who are high performing, professional and have high levels of satisfaction in their roles

We embrace and deliver change, achieve national recognition for what we do and are exemplars of best practice

We hold ourselves to account for what we deliver, measuring our outcomes, customer satisfaction and value for money, striving for continuous improvement

We promote our values and demonstrate the values of good governance through upholding high standards of conduct and behaviour

the Police and Crime Commissioner do not contravene any rule of law or engage in any activity that constitutes maladministration or injustice. The responsibilities of the Chief Executive are codified within legislation, within the Commissioner's scheme of delegation and within the documents comprising the Commissioner's wider governance framework. The Chief Executive is responsible to the Commissioner for ensuring that agreed procedures are followed and that all applicable statutes and regulations are complied with. The Chief Executive is supported by an internal legal team and will instruct external legal advisers where there are significant legal complexities or legal risk. The office structure provides for a post of a deputy Monitoring Officer to ensure continuity in the delivery of this role in the absence of the Chief Executive.

Principle B: Ensuring openness and comprehensive stakeholder engagement

Police and Crime Commissioners and their Offices are run for the public good, they therefore should ensure openness in their activities. Clear, trusted channels of communication and consultation should be used to engage effectively with all groups of stakeholders, such as individual citizens and service users, as well as institutional stakeholders.

Openness

The Commissioner operates in accordance with the Elected Local Policing Bodies (Specified Information) Orders 2011 & 2012 and the guidance provided by the Information Commissioner. This is demonstrated, documented and communicated through an information publication scheme that ensures the openness of all key information to the public and wider stakeholders. This includes information in respect of the Commissioner, his staff, income and expenditure, property, decisions, policies and the independent custody visiting scheme. The Commissioner's Monitoring Officer has overall responsibility for ensuring compliance with the Orders and Scheme.

To ensure transparency of decision making, all key decisions are taken at public meetings of the Commissioner's Executive Board and all decisions are recorded and published on the Commissioner's website for public scrutiny. A forward plan provides public notification of key decisions and papers are published a week in advance of meetings. The monthly agenda provides the opportunity for public questions. The Police and Crime Panel may call in any decisions for further public scrutiny.

Decision Making Policy: Principles of Decision Making

Decision-making will be well informed

The decision-making process will be open and transparent

To have 'due regard' within the decision making process

Be rigorous and transparent about how the decisions are taken

All decisions of significant public interest will be recorded and published.

The PCC will uphold the highest standards of integrity and honesty when taking decisions, as set out in the Nolan Principles.

The Commissioner adopts rigorous standards in his decision-making and all decisions are taken solely in the public interest. This is achieved by adherence to a decision making policy that sets out the parameters and the application of a set of principles that guide decision making. The approach within the policy adheres to the Good Governance Standard for Public Services and the Good Administrative Practice 2.

Reports for decision are based on a template that ensures the consequences of any recommendations are clearly explained and that there is clear

reasoning and evidence for decisions. This includes relevant financial, legal, human resources, equality, procurement, IT and risk management advice.

Engaging Comprehensively with Institutional Stakeholders

The Police and Crime Plan recognises the importance of stakeholder engagement and collaborative working in developing and delivering priorities for the future direction of policing, crime reduction, and supporting victims. The process for development of the Plan includes consultation with the Police and Crime Panel, wider partners and the Constabulary. Consultation processes support the development of objectives and outcomes prior to the formal approval and publication of the Plan on the Commissioner's website.

The Plan recognises that in preventing crime and supporting victims a commitment to collaborative working is needed from a range of organisations involved in policing, community safety and criminal justice. The Plan commits to utilising the existing partnership structures across the County to do this wherever possible. This enables the Commissioner and partners to build commitment to shared priorities and to exercise oversight of the delivery of shared outcomes.

As part of these arrangements the Commissioner has signed up to the Cumbria Compact, an agreement and set of principles that govern effective relationships between public and third sector organisations.

The purpose, objectives and intended outcomes from partnership and collaborative working will be set out in a Partnership Strategy included within the Police and Crime Plan. Grant agreements govern the funding arrangements with partners and the third sector and set out the purpose, objectives and shared outcomes which that funding is planned to deliver.

Joint boards, collaborative procurement and third sector partnerships are central to the Commissioning Strategy that seeks to efficiently and effectively deliver the Police and Crime Plan. The underlying Commissioning Plan uses commissioning approaches and a grant framework that enable partners to determine interventions that will be appropriate and effective in delivering outcomes.

Engaging Stakeholders Effectively including Citizens and Service Users

A Community Engagement Strategy sets out how the Commissioner will make arrangements for obtaining the views of the community on policing and for obtaining the views of victims of crime. The strategy aims to ensure clear channels of communication are in place with all sections of the community and other stakeholders. As part of the Community Engagement Strategy the Commissioner undertakes formal consultation with the public, partners and other stakeholders in respect of the Police and Crime Plan and the budget.

The Office of Public Engagement is instrumental in giving the people of Cumbria the ability to communicate with the Commissioner and plays a key role in ensuring public opinion can influence the Commissioner's decision making. The Office ensures a wide range of engagement approaches so that the Commissioner actively listens, considers and effectively uses the views of the people of Cumbria. The office plays a critical role in ensuring that two-way communication with communities take place and that the Commissioner is publically available to speak to communities and individuals.

The Office of Public Engagement has responsibility for keeping people informed, ensuring that activities and decisions are transparent and that effective, transparent and accessible arrangements are in place for providing feedback. A wide range of communication tools are used to achieve open and transparent communication with communities. This includes the statutory requirement of producing and publishing an Annual Report setting out what has been achieved in a 12 month period.

The Office of Public Engagement also supports the Commissioner around public affairs, if necessary highlighting the impacts on policing and people in Cumbria.

A complaints process and quality of service procedure provides clarity over the arrangements to respond to the breadth of concerns raised by local people. If trends are identified these are used to improve customer service from the Constabulary and influence the decisions of the Police and Crime Commissioner.



Principle C: Defining outcomes in terms of sustainable economic, social, and environmental benefits

The long-term nature and impact of many of the Police and Crime Commissioners' responsibilities mean that they should define and plan outcomes and that these should be sustainable. Decisions should further the purpose of Police and Crime Commissioners, contribute to intended benefits and outcomes, and remain within the limits of authority and resources. Input from all groups of stakeholders, including citizens, service users, and institutional stakeholders, is vital to the success of this process and in balancing competing demands when determining priorities for the finite resources available

The Commissioner's Police and Crime Plan can be found on our website at www.cumbria-pcc.gov.uk

Defining Outcomes

The Police Reform and Social Responsibility Act (PRSR) 2011 and the Policing Protocol Order set out the purpose of the Police and Crime Commissioner, conferring statutory duties and responsibilities. These include the requirement to issue a Police and Crime Plan. The Plan sets out the vision and strategic direction for policing and reducing crime for the local area. It outlines police and crime objectives, priorities and outcomes for policing and victims that the Commissioner will focus on in carrying out his purpose. The Police and Crime Plan sets out a Pan-Cumbrian vision.

Key performance indicators are set to support the objectives within the Police and Crime Plan. This is supported by a comprehensive performance management framework. The performance framework and HMIC inspection and value for money reports support the Commissioner in holding the Chief Constable to account for the performance of the force and its efficiency and

effectiveness. User Satisfaction Performance measures are included in the Performance Management Framework.

The Police and Crime Plan is developed alongside a Medium Term Financial Strategy that ensures funding is aligned to the resources needed to deliver priorities and outcomes. The forecast supports the Commissioner in setting a robust budget and in his purpose of maintaining the force for the Cumbria police area.

A Commissioning Strategy and framework supports the delivery of the Commissioner's wider duties and responsibilities and the objectives and outcomes within the Police and Crime Plan. The strategy sets out how the Commissioner will work with partners, including community and voluntary sector groups, to deliver activity and interventions that will support victims, improve community safety, reduce crime and enhance criminal justice. The strategy is underpinned by a commissioned services budget and programme. The budget funds the Office of Victims Services, supported by

a Victims Advocate, to commission and promote effective support services that will help victims to cope and recover.

Sustainable economic, social and environmental benefits

A process is in place to support policy and strategy development. Oversight of the central policy record, including compliance with procedure and equality impact assessments, is managed by the Executive Team. This ensures that the sustainability of policies and strategies and the wider benefits and interrelationships across the business are fully understood.

When developing strategies, policies or business plans the Office of the Police and Crime Commissioner will seek to impact assess such documents prior to their development. The outcomes of these assessments will inform development work and be taken into consideration when policies and strategies are approved. In this way, our policies and strategies provide a framework to support decision making.

The process for making decisions, particularly those that involve expenditure, includes an assessment of the longer term impact of proposals to ensure sustainability. Decisions on human resource planning, the most significant factor influencing the delivery of sustainable economic, social and environmental benefits, take account of the longer term financial outlook alongside projections of future turnover. This enables workforce planning and recruitment in a way that supports the economic management of training and supervision requirements and maximizes the benefits to the business.

All decision reports include a section which allows the author to identify any equality issues. These will be taken into account by the Commissioner when considering the decision.

To manage risk and ensure transparency of interests in decision making, the Commissioner and officers are required to make declarations where there are or may be perceived to be conflicts of interest. The role of the Monitoring Officer and the Commissioner's Oath of Office further supports decisions being made in the wider interest of the people of Cumbria, rather than representing any particular political interests.

The Police and Crime Plan and the policy and strategy documents that support it are developed to cover a four year rolling timeframe and take into account feedback from public consultation and engagement.

All of these documents and the outcomes from consultation are published and are publicly available on the Commissioner's website. Information is published in a variety of mediums. The OPCC website has the functionality to assist in the access to information held. The COPCC would look to assist with translation of information or send information to a third party who can assist them. The COPCC are scoping the possibility of including the functionality to translate information on their website.



Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes.

Police and Crime Commissioners achieve their intended outcomes by providing a mixture of legal, regulatory, and practical interventions. Determining the right mix of interventions is a critically important strategic choice and Commissioners have to make sure they achieve their intended outcomes. They need robust decision-making mechanisms to ensure that their defined outcomes can be achieved in a way that provides the best trade-off between the various types of resource inputs while still enabling effective and efficient operations. Decisions made need to be reviewed continually to ensure that achievement of outcomes is optimized.

Determining Interventions

The Commissioner sets the strategic direction for Policing and wider interventions within the Police and Crime Plan. The Plan is reviewed annually to ensure decision making on activity and outcomes remains robust. The Commissioner's decision making policy adopts a set of principles to ensure all decision making is well informed, that options are rigorously considered and information is provided on potential risks.

The Constabulary is the primary provider of policing services and the recipient of the substantial proportion of funding from the Commissioner to deliver the Police and Crime Plan. Achieving best value through the delivery of an effective policing strategy is a condition of the arrangements for funding between the Commissioner and the Constabulary. Decisions are made annually on the level of resources and how they should be directed as part of the Commissioner's budget setting process.

The performance, outcomes and costs of the Constabulary are monitored through a framework that includes external comparators (HMIC Value for Money Profiles), Police Effectiveness, Efficiency and Legitimacy (PEEL) inspection reports and an annual Value for Money Conclusion from the External Auditors. Recommendations from PEEL inspections are used to review decisions in year on resources and determine whether intervention are needed to respond to inspection findings.

Grant and Procurement Regulations set out a framework for commissioning and procurement activity that supports the achievement of best value and practical interventions to support Police and Crime Plan outcomes within wider commissioned services. An annual report to the Joint Audit & Standards Committee reviews value for money in respect of the costs of the Commissioner's Office, providing external oversight of staffing and wider financial resources committed to fulfilling the legal and regulatory requirements of the Office.

Medium Term Financial Strategy Objectives

To deliver a robust and balanced medium term financial plan and annual budget supported by an in-year reporting framework that monitors its delivery.

To ensure arrangements for funding between the Commissioner and Constabulary deliver value for money and support the priorities of the Police and Crime Plan

To ensure capital expenditure plans are robustly scrutinised, fully funded for a minimum of four years and are supported by capital strategies that meet the needs of the business

To maintain a risk assessed level of reserves to meet unplanned expenditure and to provide revenue budget smoothing for intermittent costs.

To ensure treasury management activities provide for the security of the Commissioner's funds whilst meeting the cash management needs of the Commissioner and Constabulary

To provide a framework for financial governance that ensures the proper administration of the Commissioner's financial affairs

Planning Interventions

A Commissioning Strategy and joint Procurement Regulations set out how services will be planned, procured and delivered. The Safer Cumbria Partnership provides a flexible and supportive mechanism through which services can be developed and delivered with shared risk. Grant and contract management arrangements are in place to monitor and review service quality.

The Medium Term Financial Strategy sets out the financial plans for revenue and capital expenditure and forms the basis of an annual funding arrangement for the Chief Constable. The arrangement codifies the amounts and conditions of funding based on a financial proposal from the

Constabulary. It sets out how the budget will be monitored including financial information and reporting requirements. Financial reporting provides a control to assess the extent to which planning assumptions for the budget have been matched by actual activity and expenditure in year. Further controls over the management of income and expenditure are detailed in the Commissioner's financial regulations. Key Performance Indicators for finance are agreed as part of the arrangements for the funding agreement and incorporated within the Finance Services Business Plan. Wider financial targets, for example prudential indicators, are set as part of the budget process, and monitored on a quarterly basis to ensure they are being met.

The Medium Term Financial Strategy sets out revenue forecasts of income and expenditure and the key financial assumptions and policies on which the forecasts are based. This supports a strategic approach to operational planning, savings requirements and decision making in support of the objectives within the Police and Crime Plan. It also ensures that the financial liabilities, risks and the level of provision and reserves within the budget are fully understood. The budget includes a 10 year capital programme aligned to plans for ICT, the estate and fleet, ensuring resources are balanced in the medium and longer term to meet the requirements of the business.

Financial, operational and commissioning plans are developed taking into account the feedback from the public and wider stakeholders. The Engagement Strategy sets out how the Commissioner will engage with a wide range of people and partners encompassing and including

diversity within the County. The Commissioner in his role of consulting with the public uses the guiding principles of we asked, you said, we did as many engagement activities personally involve the Commissioner. To formally support the role of two-way engagement a six monthly paper is presented to the Executive Board outlining trends from the various forms of engagement and this information is used as an integral part in the process of any key decisions. Further communication tools are used to ensure target audiences are kept up to date of developments and key decisions for the Commissioner.

Optimising Achievement of Intended Outcomes

The Medium Term Financial Strategy integrates the budget and funding arrangements for the Constabulary with the Commissioner's directly managed budgets. The totality of estimated funding forms the basis for considerations regarding the trade-off between resources for commissioning and resources for policing to optimise outcomes within the Police and Crime Plan. Strategic priorities within Plan support decision making on the respective policing and commissioning strategies. This determines for example, the number of police officers, the balance between people resources verses equipment and the balance between supporting victim's verses crime prevention activity.

The budget process is based on a proposal from the Constabulary. It takes a zero based approach, working closely with the business to forecast operational requirements over 4 years for revenue expenditure and 10 years for capital expenditure. This includes a series of 'star chambers' providing

Chief Officers with the forum through which budget holders can be challenged. Through the budget process targets and plans are developed for savings and consideration is given to growth bids to resource new and changing requirements.

The Medium Term Financial Strategy includes information on national financial settlements for policing and what is known about settlements in future years. It also sets out the key financial risks that could impact on funding and expenditure nationally and locally. Sensitivity analysis provides information on the potential impact of changes to assumptions. Collectively this supports decisions on resources, services, performance and outcomes and ensures the business has a robust understanding of risks to the affordability of future plans. The Strategy incorporates information on plans for savings and the impact of funding changes for the number of police officers, PCSO's and police staff. This supports an on-going dialogue and monitoring between the Commissioner and Constabulary in respect of the necessary business change and its impact on outcomes and performance.

Through our Commissioning Strategy we engage and consult with the wider community on support and service provision gaps, this ensures that commissioning objectives and outcomes align with the needs of the local community as well as creating an opportunity for providers to innovate. Commissioning to local based providers ensures the economic, social and environmental well-being of the wider Community. Awarding of Contracts or Grant Agreements are based on the social outcomes and measures which meet local priorities and needs as opposed to financial gains and benefits.

Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it

Police and Crime Commissioners need appropriate structures and leadership, as well as people with the right skills, appropriate qualifications and mindset, to operate efficiently and effectively and achieve their intended outcomes within the specified periods. Commissioners must ensure that they have both the capacity to fulfil their mandate and to make certain that there are policies in place to guarantee that management has the operational capacity for the entity as a whole. Because both individuals and the environment in which Commissioners operate will change over time, there will be a continuous need to develop its capacity as well as the skills and experience of individual staff members. Leadership is strengthened by the participation of people with many different types of backgrounds, reflecting the structure and diversity of their communities

Developing the entity's capacity

Legislation provides that the Commissioner must appoint a Chief Executive and a Chief Finance Officer (statutory officers). The Chief Executive is the Commissioner's Head of Staff with responsibility for overall management of the Commissioner's office. Both the Chief Executive and Chief Finance Officer have statutory responsibilities with regards to determining the requirements in respect of staffing resources.

The Chief Executive is a member of the Association of Police and Crime Chief Executives (APACCE) and operates within the APACCE statement on the role of the Chief Executive and Monitoring Officers for Police and Crime Commissioners. The Chief Executive's job profile is based on the APACCE model to ensure the right skills, experience and qualifications for the role.

The role and functions of the Chief Finance Officer to support the Commissioner's mandate is set out within the Home Office Financial Management Code of Practice and by the Chartered Institute of Public Finance and Accountancy (CIPFA), the CIPFA statement. The job profile for this role is based on the CIPFA Statement. Compliance with the statement is self-assessed on an annual basis and reviewed by the Joint Audit and Standards Committee. Professional body subscriptions ensure the Chief Finance Officer has access to up to date Codes of Practice, guidance and professional standards

The structure and arrangements for staffing ensures the Chief Executive has management of overall staffing as Head of Paid Service with responsibility for effective succession planning and resilience on matters of business within a small team.

A framework for the development and review of the corporate plan and underlying business plans ensures action plans and performance targets are delivered to support continuous improvement. The Commissioner's Office is reviewed annually with a report on Value for Money presented to the Joint Audit and Standards Committee. The report benchmarks staffing resources, capacity and costs within the HMIC most similar group of policing areas.

The costs of the Commissioner's Office and the Constabulary are benchmarked annually through HMIC value for money profiles with reports presented for scrutiny to the Joint Audit and Standards Committee. Comparisons to most similar group policing areas are used to inform the budget savings programme and reduce costs.

Procurement regulations are developed jointly with the Constabulary and supported by a procurement strategy. The regulations incorporate procurement policy and procedures that aim to support the understanding and skills of all staff engaged in the procurement process. The procurement strategy sets out how the function will develop to deliver best value from procurement activity. The procurement regulations are supported by a set of grant regulations governing commissioning activity through a grant based process.

Developing the entity's leadership

The key functions and roles of the Commissioner, the Chief Executive/Monitoring Office and Chief Finance Officer are set out in the Police Reform and Social Responsibility Act 2011 (PRsRA) and the Policing Protocol Order 2011 (PPO). These

Key functions and role of the Commissioner

Sets strategic direction & objectives of the force, issues the Police and Crime Plan (the Plan) & an annual report

Holds the Chief Constable to account for the exercise of his/her functions and force performance; Monitors complaints.

Receives all funding, decides the budget & precept; allocates funding to maintain an efficient and effective police force

Provides the link between the police and communities; publishes information on Commissioner and force performance

Responsible for the delivery of community safety, crime reduction, the enhancement of criminal justice and victim support

functions and roles define the responsibilities for leadership and are codified in the Commissioner's Scheme of Delegation and wider documents within the Corporate Governance Framework.

The Chief Executive is the Commissioner's lead advisor. Key responsibilities include working with the Commissioner to enable delivery against his vision, strategy and identified priorities and facilitating the accurate and appropriate scrutiny of the Constabulary's activities. The Chief Executive is also the Commissioner's statutory Monitoring Officer, providing support to ensure the Commissioner's functions are carried out and has specific legal, financial and governance duties in addition to those which derive from statutory responsibilities. The Chief Executive operates in accordance with professional standards and the legislative and fiduciary responsibilities of the statutory office.

The Chief Finance Officer is the lead financial advisor to the Commissioner and has statutory responsibility to ensure that the financial affairs of the Commissioner are properly administered. The

CFO provides all financial advice, provides a statutory report on the robustness of the budget and ensures systems of internal financial control are effective.

The Commissioner's Scheme of Delegation is part of a wider governance framework that further details specific decision making and wider responsibilities of key officers in relation to areas of governance and ensure all staff have a shared understanding of the roles, responsibilities and decision making authority within the Commissioner's Office. All governance documents are regularly reviewed and updated as roles develop to respond to changing legislation, regulations and other new requirements.

A member/officer protocol further sets out the roles of political office holders (the Commissioner/Deputy Commissioner) and non-political office holders (staff employees) to provide clarification on respective responsibilities and expectations around how relationships are anticipated to work. This is supported by arrangements for the declaration of interests to ensure the Commissioner, members and staff are free from relationships that would materially interfere with decisions making and their roles.

A project plan for transition ensures appropriate arrangements are put in place to prepare for Police and Crime Commissioner Elections. This includes providing information for potential candidates on the website and holding open briefing sessions to explain the role and provide information that can support a wide range of people to stand for election. The transition project plan includes a plan for the arrangements and information for inducting a new Police and Crime

Commissioner. The plan is supported by a risk register.

Members of the Joint Audit and Standards Committee are recruited for their specific skills and experience to fulfil the role of the Committee. Role profiles include a person specification that requires applicants to demonstrate a sound understanding and relevant professional experience. The Committee has clear terms of reference and membership that is consistent with the requirements of the Home Office Financial Management Code of Practice, and CIPFA guidance. Development sessions, access to relevant publications and CIPFA/Grant Thornton external workshops support members continued development.

The Cumbria ICV Scheme comprises four panels of Custody Visitors. Every new volunteer is required to undertake a half-day basic induction course, followed by an accompanied observation visit; thereafter, new visitors are trained "on the job" by attending visits in the company of a more experienced colleague for the first six months. On-going ICV training is provided at the regular panel meetings and annual local and regional conferences.

The Police and Crime Commissioner subscribes as a member of the Association of Police and Crime Commissioners (APCC). The APCC delivers daily written briefings received by the Commissioner and office staff, covering press and parliamentary reporting on those areas within the Commissioner's responsibilities to ensure the Office is kept updated on current developments.

The APCC and APACCE deliver national events to ensure Commissioners and their Chief Executives

remain informed and have the opportunity to discuss significant issues and develop collective approaches. There are also bi-monthly regional meetings of Chief Executives and quarterly regional meetings of Commissioners and Chief Executives. The Chief Executive/Monitoring Officer leads for the Commissioner on ensuring that appropriate policies and procedures are adopted and followed to ensure the COPCC complies with relevant statutes and regulations and has the capacity to deliver across these requirements.

The CFO subscribes to the Police and Crime Commissioners' Treasurers' Society (PaCCTS), supporting continuous development and ensuring the CFO maintains a breadth of understanding on policing finance. Further capacity and expertise is commissioned to support specialist services for treasury management, taxation and insurance brokerage.

Arrangements for staff appraisal provide the opportunity to discuss and review individual performance and training and development needs.

Developing the capability of individuals within the entity

The Commissioner has adopted a number of joint personnel policies with the Constabulary in addition to operating within a suite of COPCC specific policies that provide a framework for all issues related to employee management, terms and conditions. This includes policies on how staff and staff associations will be engaged in any change processes. There is a general principle for on-going consultation and engagement during any areas of business change, creating an environment

where staff can perform well and where ideas and suggestions are welcomed.

Personnel policies aim to promote a motivated and competent workforce whilst supporting the health and well-being of staff. They include arrangements for work-life balance through a scheme of flexible working and facilitate access to wider benefits e.g. special leave at times of specific personal need.

Business is carried out supported by policies and procedures that support the full range of human resource management responsibilities and all policies are subject to cyclical review in accordance with the Commissioner's policy framework. This supports continuous improvement, ensuring updated guidance is available for staff on how to carry out their roles and the wider responsibilities they should take into account.

All officers have clearly defined role descriptions and reporting lines based on the roles and the functions for which they are accountable, to ensure service delivery responsibilities are clear and can be monitored. Individual capabilities, performance and development requirements are assessed annually through a review process to agree the support, training and development staff need to carry out their duties and responsibilities.

Professional staff undertake continued professional development in line with the requirements of their professional bodies. The budget setting process provides for training and development budgets to support mandatory and discretionary training and development requirements.

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

Police and Crime Commissioners need to ensure that the entities and governance structures that they oversee have implemented—and can sustain—an effective performance management system that facilitates effective and efficient delivery of planned services. Risk management and internal control are important and integral parts of a performance management system and crucial to the achievement of outcomes. They consist of an ongoing process designed to identify and address significant risks involved in achieving outcomes. A strong system of financial management is essential for the implementation of policies and the achievement of intended outcomes, as it will enforce financial discipline, strategic allocation of resources, efficient service delivery and accountability.

Managing risk

The Commissioner's Risk Management Strategy sets out the overall arrangements for managing risk including the arrangements for holding to account the Chief Constable in respect of those risks that fall within his functions. The Strategy establishes how risk is embedded throughout the various elements of corporate governance of the COPCC, whether operating solely or jointly with the Constabulary. The Strategy incorporates a clear framework of objectives, designates roles and responsibilities for risk management and provides a mechanism for evaluating and scoring risks, and supporting decision making in respect of mitigating action.

The 2016-17 strategy and risk registers have been fundamentally reviewed with support from CIPFA to ensure a clear alignment between risk management activity and the organisation's objectives. As part of this process reporting formats have been updated to ensure

arrangements are dynamic and support the early identification of strategic and operational risks. Identified risks are logged on a risk register with clear ownership and are reviewed cyclically based on a score that denotes the severity and impact of the risk should it occur. Every project run by the COPCC has a separate risk register. All decision and report forms include a section for the author to complete in which to identify any risks or potential risks. To ensure effective ownership and monitoring of risks, the Office of the Police and Crime Commissioner provides risk management training, commissioned through CIPFA, to all staff.

The arrangements for risk management are subject to on-going monitoring and review to ensure their continued effectiveness. This comprises review by internal audit and review by the Joint Audit and Standards Committee. The strategic risk register is presented to the Committee at each quarterly meeting. The Committee also receives the Risk Management Strategy and a report from the Chief Executive

annually reporting on the effectiveness of arrangements for managing risk.

Managing performance

An Executive Board structure comprising the Commissioner, Chief Constable, Chief Executive and Chief Finance Officer supports and facilitates the arrangements for monitoring service delivery. The Executive Board receives regular reports providing an oversight and scrutiny function in respect of Constabulary activity and performance. Decisions of the board are subject to the Commissioner's decision making policy and principles, ensuring relevant information and advice is provided.

The Police and Crime Panel is the statutory body that provides the public accountability checks and balances in relation to the performance of the Commissioner and scrutiny of any decision made. The Panel receives cyclical information and reports on service delivery plans and progress towards outcomes. The Panel is consulted on the development of the Police and Crime Plan and budget, with a power of veto over the Commissioner's precept. The panel receives an Annual Report setting out what has been achieved in respect of delivery of the Police and Crime Plan objectives, and a financial outturn report comparing actual expenditure against the budget and including summary financial statements.

Robust internal control

The Commissioner is responsible for reviewing the effectiveness of his governance framework including the system of internal control. This work is informed by the work of Chief Officers and Senior Managers who undertake an overarching

Police and Crime Panel Functions

The functions of the Police and Crime Panel include reviewing the draft police and crime plan, public scrutiny of the annual report and the power of veto over the level of the Commissioner's proposed precept

review of key controls and governance arrangements in support of the key principles in this Code.

Senior Managers with responsibility for financial systems provide annual management assurances using a CIPFA internal control framework as part of this process. This is further supported by an annual fraud risk assessment completed by the Chief Finance Officer and reviewed by the external auditors. Arrangements for anti-fraud and corruption are subject to cyclical internal audit review. The auditor's conclusion is that these internal controls provide Substantial assurance.

An independent internal audit service is commissioned through shared service arrangements with the county and district councils. Internal audit develops and delivers a risk based annual audit plan of work that reviews internal controls. This supports an annual opinion from the Chief Internal Auditor on the overall adequacy and effectiveness of the framework of governance, risk management and control.

An independent Joint Audit and Standards Committee assures cyclical internal reviews of key governance documents (e.g. financial regulations, arrangements for anti-fraud and corruption and the risk management strategy) at its November meeting and receives annual reports reviewing the effectiveness of arrangements for risk, governance and internal control in May and July. The Joint

Audit and Standards Committee receive a copy of all internal and external audit reports, can table reports for discussion and monitor the implementation of audit recommendations. The Committee undertakes an annual self-assessment to ensure on-going compliance with the CIPFA framework for Police Audit Committees.

Managing Data

The Office of the Police and Crime Commissioner operates within the parameters of legislation, such as the Data Protection Act. It ensures that all data, including personal data, is appropriately stored and shared where necessary. Data is held in accordance with the COPCC Retention Schedule, removed or destroyed appropriately and access to information is restricted where appropriate to relevant members of staff. Data will not be held for longer than is necessary. Appropriate security measures are taken for both electronic and physical data. All staff are aware of their responsibilities when handling and storing both electronic and physical data.

Strong public financial management

Arrangements for financial management support for the Commissioner in achieving outcomes and delivering strong operational and financial performance by ensuring that resources are used in accordance with approved plans for service delivery and investment. The arrangements for financial management are codified within a suite of financial governance documents and comply with the relevant CIPFA Codes of Practice and guidance. Financial management controls ensure

expenditure is only committed in accordance with the approved budget and the purpose for which approvals have been given. Financial monitoring supports the early identification of variances between actual expenditure and income, supporting timely decision making on remedial action.

A funding arrangement between the Commissioner and Constabulary sets out the consents and arrangements for financial management between the Commissioner and Chief Constable. This ensures funding within the Constabulary is directed toward the achievement of the Policing Strategy and priority outcomes within the Police and Crime Plan.

Financial regulations set out the role and responsibilities of Chief Officers and senior staff for financial management and governance. They include financial management standards to be adhered to by all staff across the organisation and the wider framework of controls including the arrangements for the statement of accounts.

Financial risks and mitigations are set out within the Medium Term Financial Strategy and are managed within the Commissioner's overall framework for managing risk. The Commissioner's Chief Finance Officer takes ownership of all financial risks and reports to the Joint Audit and Standards Committee on the management of strategic financial risks. Arrangements for financial management are cyclically reviewed by the internal auditors for assurance and form part of the arrangements reviewed by the external auditors in forming their conclusions on the financial statements and value for money.

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

Accountability is about ensuring that those making decisions and delivering services are answerable for them. Effective accountability is concerned not only with reporting on actions completed, but also ensuring that stakeholders are able to understand and respond as the organisation plans and carries out its activities in a transparent manner. Both external and internal audit contribute to effective accountability.

Implementing good practice in transparency

The Commissioner's annual report is the primary communication through which the public can access and understand the performance and activities of the Commissioner and his Office. Design work for the report is commissioned from external media and communication professionals which alongside the written style aims to support transparency and public accessibility of the report.

All public documents are published on the COPCC website and are available in accessible formats. Further options can be offered on request. The intention is to ensure that all documents are written in such a way as to make them accessible to readers that may not have a detailed knowledge of the subject matter, though with some complex issues this is not always possible. The publication of key documents, such as the Police and Crime Plan, is supported by a media release to raise awareness of the document and its purpose.

Arrangements for financial reporting aim to ensure the accessibility of financial information for readers and users of financial reports. On complex matters of communication, for example consultation on budget, precept and services,

professional support has been procured to ensure a robust public understanding of complex issues.

Implementing good practices in reporting

The Office publishes an annual report, scrutinised by the Police and Crime Panel, to communicate the Commissioner's activities, achievements and performance and that of the Chief Constable and the force. The annual report presents the performance outcomes achieved against an agreed framework of targets and measures.

The Commissioner is subject to the Accounts and Audit (England) Regulations 2011 and prepares a set of accounts in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting. Compliance with the Code of Practice ensures the comparability of financial information within the statements with other similar entities and their publication in accordance with statutory timeframes. The financial statements include a comprehensive income and expenditure statement and the Police Objective Analysis (POA), a methodology for reporting expenditure on policing to help readers better understand policing activities and their cost. An introduction and commentary by the Chief Finance Officer sets out

the overall financial performance for the year within an accessible summary statement. The financial statements include the external auditors report setting out the overall opinion and conclusions on value for money.

The Commissioner's overall arrangements for governance are reviewed annually against this Code of Corporate Governance with a report made on how it has been complied with. This 'Annual Governance Statement (AGS)' is subject to internal audit and review by the Joint Audit and Standards Committee. The AGS includes an action plan setting out the work that will be undertaken over the following year to support continuous improvement in line with the principles of this Code and the CIPFA good governance framework.

The Commissioner's Executive Board and Joint Audit and Standards Committee receive annually a report reviewing the governance arrangements for internal audit against the requirements of the Public Sector Internal Audit Standard (PSIAS).

Assurance and effective accountability

Grant Thornton UK LLP are the external auditors appointed to both the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary, to report key matters arising from audits of the Commissioner and Chief Constable's financial statements. The external auditors also reach a formal conclusion on whether the Commissioner and Chief and Constable have put in place proper arrangements to secure economy, efficiency and effectiveness in the use of resources. The audit findings report is published in the financial statements and

presented to the Commissioner's Executive Board and Joint Audit and Standards Committee for review. The Joint Audit and Standards Committee monitors the implementation of recommendations arising from the audit and have the expertise to challenge the external audit approach, supporting assurance of its effectiveness.

Further accountability is provided through the arrangements for internal audit. Internal audit is delivered through a shared service and in accordance with an Internal Audit Charter that ensures compliance with the PSIAS. An annual review of the effectiveness of the internal audit service, including the arrangements for the Joint Audit and Standards Committee, is undertaken annually by the Commissioner's Chief Finance Officer against CIPFA best practice standards. The report is presented to the Executive Board and published on the Commissioner's website to support assurances on internal control.

The arrangements for accountability further incorporate challenge, reviews and inspections from HMIC. Whilst these are primarily aimed at Constabulary performance, elements of specific reviews include jointly delivered activities and specifically commissioned reports that cover governance across both organisations. Recommendations are reported to and monitored by the Commissioner's Executive Board and Joint Audit and Standards Committee.

The Ethics and Integrity Panel also monitors and reports on some specific areas of activity, such as complaint handling and ethical issues, and is beginning to develop a series of detailed "deep dives" into specific areas of Constabulary and COPCC activity.

The arrangements in this document set out our framework for governance in accordance with CIPFA's Good Governance Principles and guidance. Annex A to this Code sets out our governance schematic, summarising the arrangements we have in place internally and sources of external guidance and support. Further information on the arrangements for Governance can be found on the Commissioner's website under the tab headed Governance and Transparency.



We welcome your views on the Commissioner's Code of Corporate Governance. You can do this by using the contact information below:

Office of the Police & Crime Commissioner

Carleton Hall

Penrith

Cumbria CA10 2AU

Telephone: 01768 217734

E-mail: commissioner@cumbria-pcc.gov.uk





Cumbria Office of the Police and Crime Commissioner

**Risk Management Strategy
2016/2017**

Contents

Page

- 3.** Introduction
- 4.** Our Approach to Risk Management
- 5.** Risk Management Objectives
- 6.** Risk Management Framework
- 10.** Risk Management Methodology
- 13.** Risk Management Responsibilities
- 16.** Strategic Risk Register Template

Introduction

The Office of the Police and Crime Commissioner for Cumbria is committed to providing the highest quality of policing services to the people of Cumbria. We do this in a constantly changing and challenging environment. This strategy is about the approach and arrangements we have in place to manage the risks we encounter in doing this.

Risk management involves the identification, assessment and prioritisation of risks and taking action to control, minimise and monitor them. Risks are threats that have potential to impact on our organisation and the delivery of our objectives and services. Sometimes they can be positive as well as negative. Risk management activity ensures we protect against negative threats whilst recognising and taking advantage of positive opportunities.

Our strategy sets out responsibilities for risk management, what we do and how we do it. It incorporates a number of key objectives and what we aim to achieve from the arrangements we have in place. In doing so our strategy provides assurance and contributes to the overall arrangements we have for governance.

Our Approach to Risk Management

Police and Crime reduction services are delivered in a high risk environment. Like many public service organisations we are continually challenged to change the way we do things, to improve and to reduce cost. In doing this the level of risk we take as an organisation increases. Our approach to risk management recognises this by seeking to ensure we have a structured approach to manage those risks. Our approach seeks to ensure that our people and organisation are protected without stifling innovation or adversely restricting the taking of risks where we can see there are positive benefits from doing so. We describe this as being risk aware. This strategy sets out the things we have in place to embed a risk aware culture. These are:

- **Risk Management Objectives:** Our overall aims that set out what we want to achieve from the arrangements we have in place for risk
- **Risk Management Methodology:** The way we review our risks to understand their impact and decide how we will manage them
- **Risk Management Framework:** The specific things we have in place that supports the delivery of our objectives
- **Risk Management Responsibilities:** Specific responsibilities for different areas of risk for which our Commissioner, chief officers, staff, committee and auditors are accountable

The rest of this strategy sets out more information on our objectives, framework, methodology, responsibilities and sets out how we record our risks on our risk register.

Risk Management Objectives

Risk management makes an important contribution in helping to achieve our aims and deliver better services. Through being aware of risk and having an understanding of its impact we can make better decisions about what and how we do things. Risk management works best when we have a culture that is risk aware. Our strategy aims to achieve this by providing a framework that helps to integrate and embed risk management into our day to day business. To do this we have identified a number of objectives that we are committed to. This section of our strategy sets out what they are and what we will do to achieve them.

Objective 1: We will ensure that Risk management is part of the process for delivering policing and crime reduction in Cumbria through the Constabulary and our wider Partners. We will do this by:

- Maintaining an effective risk management strategy, a framework through which the strategy is implemented and a risk register to manage risks
- Holding the Constabulary and wider Partners to account in respect of their arrangements for risk management

Objective 3: We will ensure that there is clear ownership and accountability for risks. We will do this by:

- Establishing clear roles and responsibilities in relation to risk management within our strategy
- Ensuring all risks on our risk register has a risk owner and an action owner

Objective 2: We will ensure that our organisation is risk aware and that arrangements for risk management comply with best practice. We will do this by:

- Providing communications and guidance through our website to spread good practice
- Ensuring our officers are appropriately trained in risk management practice
- Subjecting our risk management arrangements to annual review

Objective 4: We will provide a framework for evaluating and responding to risks that is easy to understand and supports decision making. We will do this by

- Setting out a framework for risk management
- Including within the framework a methodology for scoring risks and timescale for risk review based on the risk score.

Risk Management Framework

Our risk management framework sets out the things we have in place to manage risk and who is responsible for them. They form the substantive part of what we do to achieve our risk management objectives. The framework comprises:

RISK MANAGEMENT FRAMEWORK

Risk Register

Our risks are recorded on a risk register. The register holds key information about each risk including a description of the risk, a score for the risk, what we are doing to manage the risk currently and any further actions we plan to take. It identifies the risk owner and the score determines how frequently that owner will review the risk to ensure we are taking appropriate action. The risk register groups risks into three risk categories; strategic risks, operational risks and project risks.

RISK MANAGEMENT FRAMEWORK

Risk Classification

Risks are grouped on our risk register into one of three classifications. The classification determines who is responsible for managing the risk and how those risks are managed. The classifications are:

- Strategic Risks – risks that threaten the achievement of strategic objectives such as those in our policing plan and other core strategies.
- Operational Risks – these are risks to our operating systems, service delivery and the objectives in our business plans.
- Project Risks – risks identified as being significant to the projects being undertaken by the Commissioner.

RISK MANAGEMENT FRAMEWORK

Risk Methodology

Risk Methodology is about how we score our risks. Our strategy sets out a consistent way to do this that takes account of the impact of the risk and likelihood of it occurring. The higher the risk score the more frequently we will assess the actions that we have in place to mitigate the risk. We score both the inherent risk and the mitigated risk. The inherent risk score tells us what the impact of the risk could be if we took no action whilst the mitigated score tells us how much we have reduced the risk as a result of things we do to manage it.

RISK MANAGEMENT FRAMEWORK

Police & Crime Plan

The Police and Crime Commissioner has a Police and Crime Plan which identifies the work to be undertaken by the Commissioner, the Office of the Police and Crime Commissioner; and how policing will be delivered in Cumbria. The development of the plan informs our work in relation to

strategic risks. Strategic risks are incorporated within the strategic risk register which is approved by the Police and Crime Commissioner and presented to the Audit and Standards Committee for scrutiny. Operational risks are included within the operational risk register and are actively managed through the Commissioner's Office under the direction of the Chief Executive.

RISK MANAGEMENT FRAMEWORK

Project Risks

Project risks are managed very dynamically due to the more limited timescale across which projects are typically delivered. They are reviewed prior to each project board and presented to each meeting. This means that the pace of the project and the frequency of meetings are aligned to the review of risks. The terms of reference for all project boards includes responsibility for managing project risks.

RISK MANAGEMENT FRAMEWORK

Risk Review

Our overall arrangements for risk are reviewed annually by the Chief Executive as part of the review of wider governance arrangements. The review is reported in the Annual Governance Statement alongside our Statement of Accounts, which is approved by the Police and Crime Commissioner. The statement is subject to external audit and presented with the Accounts to our Audit and Standards Committee.

RISK MANAGEMENT FRAMEWORK

Risk Appetite & Tolerance

Risk appetite is developed in the context of the organisation's risk management capability. It is not a single, fixed concept and there will be a range of appetites for different risks which need to align. Risk appetite must take into account differing views at a strategic and operational level and these may vary over time. If a level of risk is not acceptable then it must be managed accordingly. Risk tolerance allows for variations in the amount of risk COPCC is prepared to tolerate for a particular activity or project. How COPCC will deal with risk tolerance for all its risks and this is addressed within the methodology section of this strategy.

COPCC will strive to manage both strategic and operational risks to a level which is acceptable or where it is negated, taking into account the costs of any mitigations which are required. Depending upon the circumstances it may be necessary to set a different risk appetite for a particular area of business or project but the general default position for COPCC will be medium/cautious.

The OPCC has a Risk Matrix which illustrates assessments of the likelihood and impact scores which are plotted onto a (4 x 4) Risk Matrix. This determines the level of inherent risk and, later, to demonstrate the residual position after the application of controls to mitigate and reduce risk

LIKELIHOOD	Very High	4	4	8	12	16
	High	3	3	6	9	12
	Medium	2	2	4	6	8
	Low	1	1	2	3	4
			1 Low	2 Medium	3 High	4 Catastrophic
Magnitude of Impact						

Key

Risk Management Action Level	Low Priority No additional action needed Maximum review time frame 12 months	Some additional activity may be necessary Maximum review time frame 6 months	Activity required in current year Maximum review time frame 3 months
-------------------------------------	---	---	---

RISK MANAGEMENT FRAMEWORK

Risk Responsibility

Our strategy allocates specific roles and responsibilities to members and officers for Risk Management. This ensures there is clarity and accountability for ensuring our practices are embedded and our objectives are achieved.

RISK MANAGEMENT FRAMEWORK

Fraud Risk Assessment

Fraud risk assessment is used to assist staff to identify and deal with any suspected risk of fraud and ensure that adequate and effective internal control arrangements are in place. As part of the preparation process for the financial statements of accounts, evidence and assurances are provided for scrutiny to the external auditors. This information is then assessed and incorporated into the final statement of accounts. Our independent Audit and Standards Committee is provided with a copy of the final statement of accounts for consideration and can monitor any fraud issues which are raised.

We have an Anti-Fraud and Corruption Policy which provides staff with information on fraud and corruption including contact details for the reporting of any concerns. Our independent Audit and Standards Committee reviews the policy and ensures that it meets recommended practices. Also in place is a Whistleblowing Policy (Confidential Reporting) which provides effective mechanisms for ‘open’ and ‘confidential’ reporting of wrongdoing.

RISK MANAGEMENT FRAMEWORK

Internal Audit

Our arrangements for risk management and those of the Constabulary are subject to internal audit provided as part of a shared internal audit service within Cumbria. The service has adopted the Public Sector Internal Audit Standards (PSIAS) which ensures that they undertake risk based internal auditing. This methodology is used to help our organisation accomplish its objectives. Our independent Audit and Standards Committee receives the findings of audit work and monitors the implementation of actions following any audit recommendations.

RISK MANAGEMENT FRAMEWORK

Decision Making and Risk

Our reporting formats include a section on the risk implications of any decision and course of action. This ensures that decisions are taken on an informed basis and agreement can be reached on how risks should be managed.

RISK MANAGEMENT FRAMEWORK

Lead Officer for Risk

Our Governance & Business Services Manager is designated as lead officer for risk. This means that one of our staff has specific responsibility for maintaining an up to date awareness of risk management practices and ensuring we embed a risk aware culture. Our lead officer attends risk management meetings with the Constabulary to assure their arrangements and that our risk registers are aligned where it is appropriate. This is one of the ways we hold the Constabulary to account for their risk management arrangements.

Collectively this framework ensures that we have a systematic approach to managing our risks. It facilitates proper consideration of the implications of decisions and actions and provides a mechanism through which we can evaluate how well our approach is working in practice. Internal and external audit provide a further layer of validation and scrutiny of our arrangements.

Risk Management Methodology

This strategy adopts a risk management methodology to assess the impact of a risk should it materialise and the likelihood of this happening. This methodology plays an important part in determining how much attention we need to give to managing specific risks through helping us to consider the implications should they arise. The methodology involves scoring risks based on the likelihood of the risk happening and the impact. It uses a 4x4 matrix that produces a risk score of between 1 and 16.

RISK MATRIX : LIKELIHOOD		
Likelihood Score	Description of likelihood over the next 4 years	
4	Very High	Will undoubtedly happen, possibly frequently
3	High	Will probably happen, but not a persistent issue
2	Medium	May happen occasionally
1	Low	Not expected to happen, but is possible

RISK MATRIX: IMPACT

Impact Score	Description					
		IMPACT ON SERVICE OBJECTIVES	FINANCIAL IMPACT	IMPACT ON PEOPLE	DURATION OF IMPACT	IMPACT ON REPUTATION
4	Catastrophic	Unable to function, inability to fulfil obligations – total failure of at least 2 areas of activity	Severe financial impact (Above £5m / budget implications)	Internally – wholesale resignation, unable to staff OPCC Externally – service user death	In excess of 1 year to recover pre event position	Severe damage to reputation Sustained and prolonged national media interest PCC resignation
3	High	Significant impact on service provision – total failure of at least 1 area of activity with impact across all areas of business	Significant financial impact (over £1m)	Internally – increased staff turnover/ shortage Externally – general/systemic poor user experience	Between 6 months to 1 year to recover to pre event position	Significant damage to reputation Short term national / longer term local media interest

2	Medium	Material impact on service objectives – at least 2 areas of business / several personal objectives	Material financial impact (over £250k - £1m)	Internally – high level of staff absences Externally – multiple poor service user experience	Between 2 to 6 months to recover to pre event position	Adverse publicity, noticeable damage to reputation. Short term local media interest
1	Low	Some impact on service objectives – single area of business/ individual objectives	Some financial impact (up to £250k)	Internally - low morale Externally – some poor service user experience	Up to 2 months to recover	Some damage to reputation 1 day local media interest

RISK MANAGEMENT METHODOLOGY

Using the Methodology

There are a number of steps to using our methodology to ensure that risks are effectively considered and appropriate controls are put in place to manage them.

Firstly the inherent or base risk score is calculated. This is the risk score that would result if there is no action taken to manage the risk. Using the matrix above a score would be calculated by multiplying the likelihood score with the impact score. It is important to understand this base risk as it helps us to assess what might happen if the measures we put in place to manage the risk fails or if we put nothing in place. It supports decision making on the level of effort that should be directed towards reducing the risk.

Once the base risk has been scored, consideration is given to what we can do and what we are doing to reduce the risk. These are our risk control measures. The risk is then scored again, taking into account the effects of our actions. This produces a mitigated risk score against which we can then decide to do one of four things:

- Take/Tolerate - We decide to accept the risk and take no further measures
- Transfer - We transfer all or part of the risk, for example through insurance or to other agencies/contractors
- Reduce - We introduce additional control measures to reduce the risk
- Avoid – We aim to eliminate the risk, for example by ceasing to provide a service or by doing something a different way

If we choose to transfer, treat or terminate the risk we then update our mitigated risk score once these actions have been taken. The overall inherent and mitigated risks scores are reviewed cyclically with the score determining how often we do the review. Risks with scores of between 8 and 16 are reviewed on a quarterly basis; and those scoring between 4 and 6 are reviewed every 6 months. All other risks are reviewed annually. The exception is project risks that are reviewed at each project board meeting due to the limited life of project activity and the impact of risk on project delivery.

The inherent and mitigated risk score, control measures and any additional planned control measures are documented within our risk register. We assign a 'RAG' rating (Red, Amber and Green) to identify whether a risk is Acceptable (Green); Tolerable with actions (Amber); or Unacceptable with urgent action required (Red) to each of the COPCC risks. This assists in the easy identification of those risks which require urgent attention or close monitoring to those which can be reviewed on a less frequent basis.

The register identifies the review frequency and the officer responsible for managing the risk. Strategic risks under the direction of Police and Crime Commissioner are presented at least annually to Audit and Standards Committee with this risk strategy. At each quarterly meeting of the Committee, strategic risks which have been reviewed during the last quarter are presented for their oversight.

Risk Management Responsibilities

Our strategy allocates specific responsibilities to key individuals, and any OPCC committees and boards to ensure clear lines of accountability for managing risk. This section of our strategy sets out those responsibilities.

RISK MANAGEMENT RESPONSIBILITIES

The Police and Crime Commissioner

The Police and Crime Commissioner has strategic responsibility for the overall arrangements for risk management. An annual governance statement is approved annually by the Commissioner which includes a commentary on the effectiveness of risk management arrangements by the Commissioner's Chief Internal Auditor.

The Commissioner is responsible for strategic risks as identified within the strategic risk register and for understanding and challenging risks as part of their processes for developing policy and decision making.

The Commissioner has responsibility for holding the Constabulary and wider partners to account for their arrangements in respect of risk management and providing public assurance of such. The Commissioner annually approves the risk management strategy and takes overall responsibility for the strategic risk register.

RISK MANAGEMENT RESPONSIBILITIES

Chief Officers

The OPCC Chief Executive has responsibility for maintaining sound systems of internal control including risk management processes. The Chief Executive also has responsibility for ensuring an operational risk register is maintained to support the management of those risks that may impact on the delivery of the OPCC business plan.

The Chief Executive reports on the effectiveness of arrangements for risk management within the Annual Governance Statement to the PCC and to the Audit and Standards Committee. The Chief Finance Officer has responsibility for ensuring appropriate internal audit arrangements are maintained and for insurance in respect of those risks that are transferred.

RISK MANAGEMENT RESPONSIBILITIES

Managers and Staff

Managers and staff - have responsibility for the strategic and operational risks arising in their service areas. They must ensure teams carry out risk assessments to inform control measures and mitigating action. They are responsible for ensuring risks that may impact on the delivery of their business objectives are recorded in the strategic and operational risk register and actively managed.

Where a risk is identified by a manager or member of staff which affects another part of COPCC's business then this will be highlighted to the appropriate manager or member of staff for inclusion within the register. A risk which is considered to have a significant effect on medium to long term

objectives can be escalated to the Executive Team for consideration, inclusion within the strategic risk register and appropriate action identified and instigated. Following their consideration it may be reported to the Commissioner to appraise him of the issues.

OPCC staff are able to receive direction and instruction regarding their responsibilities for operational risk from a number of sources. These include – information contained within policy/strategy and procedure manuals; as part of their induction process; from their line manager; the lead officer for risk and specific training courses where required.

RISK MANAGEMENT RESPONSIBILITIES

Project Managers

Project managers are responsible for ensuring any project risks are actively recorded on a project risk and issues log. All risks should be scored in line with the agreed risk methodology within this risk strategy and reported to the project board to ensure appropriate action is taken. As part of updates or project reports any identified risks should be reported upon, with particular attention to those which may disrupt or halt the project.

RISK MANAGEMENT RESPONSIBILITIES

Independent Audit and Standards Committee

The Office of the Police and Crime Commissioner and the Constabulary have in place a Joint Audit and Standards Committee which has independent membership.

The Committee will examine evidence provided by internal and external audit and other governance areas to ensure that we demonstrate we are actively managing our risks. This provides independent assurance to the Commissioner, Chief Executive and Chief Finance Officer.

The relevant terms of reference of the Joint Audit and Standards Committee are:

- Monitor the effective development and operation of risk management, review the risk profile, and monitor progress of the Police and Crime Commissioner and the Chief Constable in addressing risk-related issues reported to them.
- Consider reports on the effectiveness of internal controls and monitor the implementation of agreed actions.
- Review arrangements for the assessment of fraud risks and potential harm from fraud and corruption and monitor the effectiveness of the counter-fraud strategy, actions and resources.

RISK MANAGEMENT RESPONSIBILITIES

Internal and External Audit

Internal audit are responsible for periodically reviewing the effectiveness of risk management processes including the verification that controls are operating as intended. This source of independent assurance is a fundamental part of the evidence used to discharge our accountability for reviewing the effectiveness of our governance arrangements. External auditors review the annual governance statement that sets out how we have complied with our arrangement for risk

management and will test a number of financial controls that mitigate against financial risks as part of their audit work on the financial statements

RISK MANAGEMENT RESPONSIBILITIES

Lead Officer for Risk

The OPCC Governance & Business Service Manager is the lead officer for risk. This responsibility includes:

- Pro-actively driving forward the management of risk
- Liaison with the Constabulary, other partners and major contractors to monitor compliance with and the effectiveness of their risk management arrangements and reporting thereon to the Police and Crime Commissioner
- Monitoring the implementation of the risk management action plans of both the OPCC and Constabulary
- Bring to the attention of the Police and Crime Commissioner and/or Audit and Standards Committee any concerns about the arrangement for risk management
- The provision of a risk register system to aid the recording, review, analysis and reporting of strategic and operational risks
- Maintaining an up to date awareness of risk management practice and leading on communications and guidance to support the embedding of a risk aware culture

OFFICE OF THE POLICE & CRIME COMMISSIONER – STRATEGIC RISK REGISTER

Risk Mitigation Strategies:	
Avoid	Stop the risk completely or stop it having an impact.
Reduce	Reduce the likelihood and/or impact of the risk
Transfer	Outsource, use contractors or insure against things going wrong
Accept	The risk is tolerable/accepted

Risk Score		Likelihood – over the next 4 years
1	Low	Not expected to happen, but is possible
2	Medium	May happen occasionally
3	High	Will probably happen, but not a persistent issue
4	Very High	Will undoubtedly happen, possibly frequently

Risk No.	Risk Title	Total Score	Risk Owner		Actions		Reviews
			Risk Owner	Action Owner	Any outstanding actions YES/NO	Date for actions to be completed	Date of next review
R1	Strategic Finance	12	Chief Executive	Chief Finance Officer	No		May 2016

Scores:

8 – 16	Review within 3 months
4 - 6	Review within 6 months
3 or less	Review within 12 months

Risk No: R1	Risk Title: STRATEGIC FINANCE	The Police and Crime Commissioner is required to set a balanced budget. Resources from central Government formula grant provide the significant majority of funding to deliver police services. Reductions in that funding will have a substantial impact on the level of policing that can be provided and on the potential to deliver the Commissioner's wider responsibilities.
------------------------------	--	--

Risk Mitigation Strategies:	
Avoid	Stop the risk completely or stop it having an impact.
Reduce	Reduce the likelihood and/or impact of the risk
Transfer	Outsource, use contractors or insure against things going wrong
Accept	The risk is tolerable/accepted

Risk Score		Likelihood – over the next 4 years
1	Low	Not expected to happen, but is possible
2	Medium	May happen occasionally
3	High	Will probably happen, but not a persistent issue
4	Very High	Will undoubtedly happen, possibly frequently

What is the cause of the risk? (Lack offailure to.....)	What is the consequence of the described risk? (Results in.....leads to.....)	Unmitigated Score			Mitigated Score			Risk Owner & Mitigation Strategy (Avoid, reduce, transfer, accept)	Actions				
		Impact	Likelihood	Risk Score	Impact	Likelihood	Risk Score		Current Controls in Place to Mitigate the Risk	Assurances	Future or further actions to be taken	Action Owner(s)	Review Date
Lack of resources within the medium term budget to provide sufficient funding for the Constabulary to deliver current levels of policing service. High levels of funding uncertainty are impacting on this risk from 2017/18 (expected implementation date for the new formula)	This risk may lead to a reduction in the level of police services and/or result in Cumbria Constabulary not being viable as an independent force. Alternative options for delivering a police service in Cumbria may have to be considered. This may impact on the extent to which services respond to local needs in Cumbria. During the period of change there may be reductions in public assurance/confidence.	4	4	16	3	4	12	Chief Executive (Reduce)	Work continues to model the potential financial impact ensuring the change team develop proposals for the full potential range of income reductions. The constabulary is implementing a scalable model of policing. Work is on-going to establish a minimum funding requirement. The Constabulary and OPCC have responded to the government funding consultation and made representations regarding the impact of current proposals.	Budget monitoring processes and internal controls ensure that financial commitments do not exceed planned expenditure. The financial control environment is tested annually by internal and external audit. HMIC Peel inspections and external auditors review overall financial resilience and the track record of delivering savings.	Work is being undertaken to develop a potential future operating model for policing in Cumbria The Commissioner and Chief Constable will fully engage in the on-going process for formula review	Chief Finance Officer	May 2016



Cumbria Office of the Police and Crime Commissioner

Executive Board April 6th 2015
Item 6.3

Draft Internal Audit Plan & Internal Audit Charter 2016/17

Report of the Chief Finance Officer

1.0 EXECUTIVE SUMMARY

- 1.1 The draft plan has been prepared in consultation with senior management and in conformance with the Public Sector Internal Audit Standards (PSIAS).
- 1.2 The Standards require that the Audit Manager prepares an annual risk based audit plan for review by Senior Management and Joint Audit & Standards Committee and approval by the Executive Board.
- 1.3 The attached draft plan has been prepared in accordance with the planning methodology agreed by the Shared Internal Audit Services Board. The approach included:
 - Consultation with senior management across the Office of the Police and Crime Commissioner and Cumbria Constabulary
 - Review of the strategic risk register and annual governance statement action plans for 2015/16
 - Review of outcomes of previous audit reviews and other inspections
 - Consideration of national, regional or emerging issues; and
 - A risk assessment to rank the audits in priority order
- 1.4 Where appropriate, consideration has also been given to other sources of assurance to avoid duplication and ensure the best use of Internal Audit resources.
- 1.5 The arrangements for follow up of internal audit reviews is also attached as an appendix to the plan.

2.0 RECOMMENDATION

- 2.1 The Commissioner asked to approve the draft internal audit plan for 2016/17.

Joint Cumbria Office of the Police and Crime Commissioner and Cumbria Constabulary Internal Audit Plan 2016/17

1. Introduction

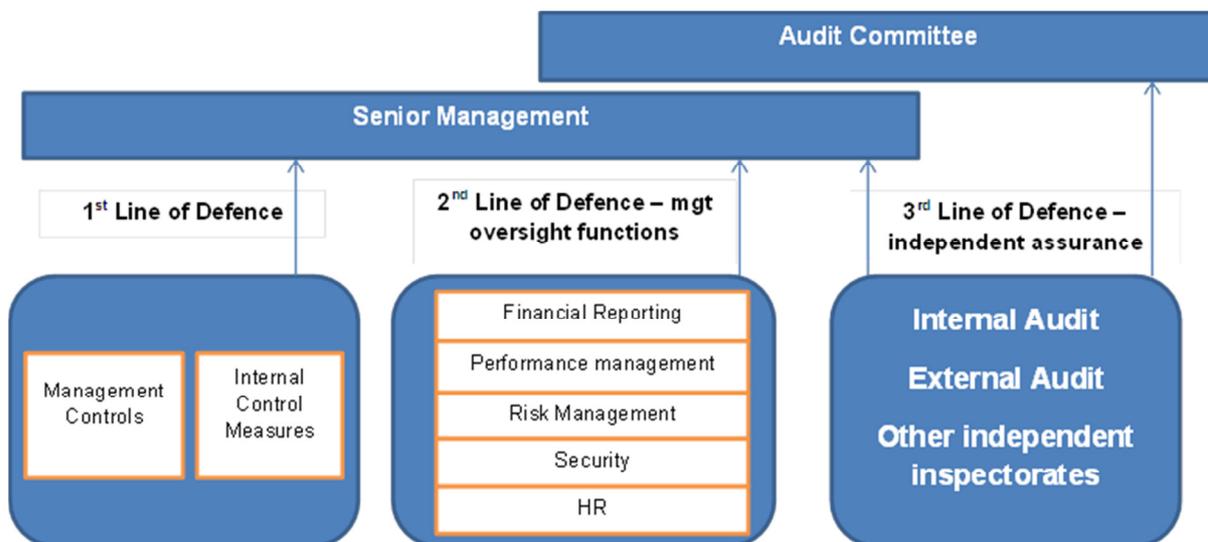
- 1.1 Internal Auditing is “an independent, objective assurance and consulting activity designed to add value and improve an organisation’s operations. Internal audit helps the Commissioner’s Office and Constabulary to achieve their objectives by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of risk management, control and governance processes.” (Chartered Institute of internal Auditors).
- 1.2 The Accounts and Audit Regulations 2015 require the Commissioner’s Office and Constabulary to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes taking into account public sector internal audit standards or guidance.
- 1.3 The PSIAS affirm the need for annual risk based audit plans to be developed in order that the Head of Internal Audit can form an annual opinion on the organisations’ systems of risk management, governance and internal control.
- 1.4 This Internal Audit Plan has been prepared in line with the Public Sector Internal Audit Standards and following consultation with the senior management of both the Commissioner’s Office and Constabulary to identify the areas where it is considered that Internal Audit can add the greatest value. The Plan is attached at Appendix 1.

2. Internal Audit Service delivery

- 2.1 The PSIAS require that the Internal Audit plan sets out a high level statement of how the Internal Audit Service will be delivered and developed in accordance with the internal audit charter and how it links to the organisational objectives and priorities.
- 2.2 Internal Audit at the Commissioner’s Office and Constabulary is delivered through a Shared Internal Audit Service. Cumbria County Council is the host authority for the Shared Service with other participants being; Carlisle City Council and Copeland Borough Council. The Shared Internal Audit Service is governed by a Shared Services Operations Board comprising the Section 151 Officers of each participating authority. A Shared Services Agreement is in place which has been signed up to by each organisation.
- 2.3 Internal audit reviews are undertaken using a risk-based approach in line with the PSIAS. This ensures that audit reviews focus on the areas of risk and that assurance covers the wider framework of governance, risk management and internal controls.

3. Roles of Management and of Internal Audit

- 3.1 The respective roles of managers and internal audit are summarised in the three lines of defence model shown below which sets out the position of internal audit in providing assurance that the management arrangements over governance, risk management and internal control are adequate and effective.



3.2 It is the role of management to establish effective systems of governance, risk management and internal controls in order to:

- safeguard resources and prevent fraud;
- ensure the completeness and reliability of records;
- monitor adherence to laws, regulations, policies and procedures;
- promote operational efficiency demonstrate the achievement of value for money; and
- manage risk

3.3 It is the responsibility of management to establish the checks and balances needed to confirm that their systems are working effectively, that all information within them is accurate, that they are free from fraud or error.

3.4 Internal audit's role is to provide assurance that management are undertaking the appropriate checks over their systems to confirm that they are working effectively. It is not the role of internal audit to re-perform management's checks or to undertake such checking on management's behalf.

3.5 In order to safeguard its independence, Internal Audit does not have any operational responsibilities and is not responsible for any of the decision making, policy setting or monitoring of compliance within either the OPCC's Office or the Constabulary.

4. Internal Audit Resources

4.1 The Commissioner's Office and the Constabulary are part of the Shared Internal Audit Service. Internal Audit days to be provided are agreed annually with the Commissioner's Chief Finance Officer. The level of Internal Audit resource in the proposed plan has been determined so as to ensure that both organisations have appropriate internal audit coverage in order to provide an opinion on the systems of governance, risk and internal

control, for each organisation, in line with the PSIAS and in order to support the preparation of the Annual Governance Statements.

5. Categories of Internal Audit Work

- 5.1 **Cross-cutting Reviews** – Reviews which are strategic in nature or which cut across both organisations. These reviews are designed to provide assurance that the Commissioner’s Office and Constabulary have effective governance and risk management arrangements to mitigate strategic risks.
- 5.2 **Constabulary Risk-Based audit reviews** – these reviews have been identified in consultation with senior management.
- 5.3 **Financial System reviews** – A three year rolling programme of financial systems has been determined in conjunction with the OPCC and Chief Constable’s Chief Finance Officers. The programme is attached at Appendix 2.
- 5.4 **Audit planning and management** – provision for management of internal audit activity in relation to the work undertaken for the Commissioner’s Office and Constabulary has been built into the plan. This includes preparation of the annual internal audit plan, attendance at and preparation of progress reports for the Joint Audit and Standards Committee and liaison with management and the external auditor.
- 5.5 A summary of the number of days allocated to each category of audit work is shown below. Percentage figures from the 2014/15 audit plan are included for reference.

	2016/17		2015/16
Category	Days	% of total days	% of total days
Cross Cutting risk based audit reviews	46*	16	22
Constabulary risk-based audit reviews	147	54	53
Financial Systems	40	15	11
Follow up	15	5	2
Contingency	0	0	0
Police audit training and development event	2	1	1
Overhead (planning / management time)	24	9	10
TOTAL	274*	100	100

* includes 15 days carried forward from 15/16 for the governance audit (procurement)

5.6 Key points to note:

- An increase of 27 audit days due to the risks identified within the organisations. The 2015/16 plan provided 232 days.
- Overall the types of audit are consistent with the 2015/16 audit plan.

6. Performance Standards

- 6.1 A suite of performance measures has been developed and reported to Joint Audit & Standards Committee over the previous two years. It is proposed that the same measures will be used during 2016/17 and will continue to be reported quarterly to Joint Audit & Standards Committee.

7. Internal Audit Charter

- 7.1 It is a requirement of the PSIAS that the Joint Audit and Standards Committee regularly reviews and approves an internal audit charter. The charter sets out the role, purpose and responsibilities of internal audit. The charter provides for annual review and approval alongside the annual draft internal audit plan. The charter is attached at Appendix 3; no changes are being proposed.

Appendix 1 - Draft proposed internal audit plan 2016/17

Audit Review	Description	Days
Procurement <i>(Audit of Constabulary and OPCC)</i>	Work brought forward from 15/16 Internal Audit plan. Additional days were required to fulfil the organisations' required scope from this review. It was agreed with the COPCC Chief Finance Officer that additional days should be allocated from 16/17 plan with work carried out and reported in 16/17. <i>NB Days allocated include the 15 days carried forward from 15/16 plan</i>	25
Information Security <i>(Audit of Constabulary)</i>	Review to provide assurance over management arrangements to secure data held by the Constabulary.	20
Mobile and Digital <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. The Constabulary has invested significant resources in this area. Internal Audit to provide assurance over management's arrangements to ensure value for money, effectiveness and efficiency from the initiative.	15
Command and Control <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. A Command and Control structure was established during 2015/16. Internal Audit to provide assurance over the Constabulary's arrangements for ensuring the new structure achieves its objectives and value for money.	20
Criminal Justice Unit <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. The Constabulary have moved to digital case files. Internal Audit to provide assurance that effective arrangements are in place within the Constabulary to ensure that case files are complete, robust and secure.	20
Use of Stop Sticks (Stingers) <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. Audit review to provide assurance that the Constabulary has effective arrangements in place for complying with regulations and ensuring that effective training is provided and equipment is appropriately maintained.	15
Stop Search <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. Audit review to provide assurance that the Constabulary has effective arrangements for ensuring compliance with the Best Use of Stop and Search Scheme.	15

Audit Review	Description	Days
Offender Management <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. Audit review to provide assurance that the Constabulary has effective arrangements in place to ensure that offenders are progressed through the system efficiently.	15
Receipt, handling and disposal of drugs <i>(Audit of Constabulary)</i>	Internal Audit review to provide assurance that the Constabulary has effective arrangements in place to ensure that seized drugs are properly accounted for from receipt through to disposal.	12
Self-service – travel expenses / overtime <i>(Audit of Constabulary)</i>	Identified through management consultation as a priority for Internal Audit assurance. Internal Audit review to provide assurance that the Constabulary has effective arrangements in place over the use of the system in relation to control and recording of travel expenses and overtime.	15
	Subtotal for risk based audits	172*
	Subtotal for non-risk based audits (see table below for detail)	102
	Total for all proposed audit work for 2016/17	274

* Includes 15 days brought forward from 15/16 Internal Audit plan

Other audit work to be included in the audit plan

Some audits are undertaken on a cyclical basis or because there are other requirements for the work to be done. This section outlines any additional non-risk assessed work planned for both organisations.

Audit Review	Description	Days
Governance <i>(Audit of Constabulary and OPCC)</i>	Cyclical programme of governance themed reviews. The 16/17 review will focus on the arrangements in place to ensure the Code of Corporate Governance is compliant with the updated CIPFA / SOLACE governance framework.	15
Annual Governance Statement (two separate reviews)	Review to provide assurance that sufficient and suitable evidence is available to support the Annual Governance Statement.	6
Financial System Reviews: <ul style="list-style-type: none"> • Pensions • Payroll • Main Accounting 	A rolling programme of financial systems audits is undertaken. The frequency of each review has been considered by the OPCC and Chief Constable's Chief Finance Officers and a risk assessment prepared taking into account internal management assurance statements,	15 15 10

Audit Review	Description	Days
<i>(Cross Cutting Review)</i>	transaction volume, value, system changes and assurance provided from Internal Audit work.	
Follow up: <ul style="list-style-type: none"> • Business Continuity Planning (Constabulary) • Business Continuity Planning (OPCC) • Duty Management System 	Internal audit follow up methodology includes the follow up of all audits resulting in less than Reasonable assurance	5 5 5
Attendance at police audit training and development event	n/a	2
Internal Audit Management	Time is built into the audit plan for the management of the shared service in relation to the work undertaken for the constabulary and the Commissioner's Office. To include; Attendance at Audit & Standards Committee (5 meetings in year) Preparation of progress reports and annual reports and opinions Audit planning Management liaison Effectiveness of Internal Audit – Compliance with PSIAS	4 6 9 4 1
	Subtotal for non-risk based audits	102

Appendix 2 – Financial System Reviews

The table below shows an indicative three year programme of financial system audit reviews designed to ensure that all key financial systems are audited on a regular basis. The OPCC and Chief Constable's Chief Finance Officers have risk assessed the financial systems taking into account assurances provided in management control questionnaires. The risk assessment will be undertaken annually to factor in any changes.

2016/17		2017/18		2018/19	
Review	Days	Review	Days	Review	Days
Pensions	15	Debtors	15	Pensions	15
Payroll	15	Treasury Management	10	Payroll	15
Main Accounting	10			Main Accounting	10
				Creditors	15
Totals	40		25		55



Cumbria Office of the Police and Crime
Commissioner and Cumbria
Constabulary

Internal Audit Charter

Introduction

- 1.1 This charter describes the purpose, authority, responsibilities and objectives of Internal Audit. It establishes Internal Audit's position within the entities of the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary and the nature of the Head of Internal Audit's functional reporting relationships with the Executive Board and the Joint Audit and Standards Committee. For the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary the role of the Head of Internal Audit is fulfilled by the Audit Manager of the Cumbria Shared Internal Audit Service.
- 1.2 The charter also provides for Internal Audit's rights of access to records, personnel and physical properties relevant to audit engagements. Final approval of the audit charter rests with the Executive Board having been subject to review by the Joint Audit and Standards Committee.
- 1.3 The Cumbria Shared Internal Audit Service is required to conform to the mandatory Public Sector Internal Audit Standards (PSIAS). These standards comprise a Definition of Internal Auditing, a Code of Ethics and the Standards by which Internal Audit work must be conducted. Any instances of non-conformance with the PSIAS must be reported to the Executive Board and the Joint Audit and Standards Committee and significant deviations must be considered for inclusion within Annual Governance Statements and may impact on the external auditor's value for money conclusion.
- 1.4 An audit charter is one of the key requirements of the PSIAS. As such, failure to approve an internal audit charter may be considered to be a significant deviation from the requirements of the Standards.
- 1.5 The charter must be presented to senior management, reviewed by the Joint Audit and Standards Committee and must be approved by the Police and Crime Commissioner and the Chief Constable, as the body charged with governance.
- 1.6 The Public Sector Internal Audit Standards use the terms 'board' and 'senior management' and require that the audit charter defines these terms for the purpose of the internal audit activity.

For the purposes of this charter the 'board' refers to the Executive Board, a board comprising the Police and Crime Commissioner, the Chief Constable, the Commissioner's Chief Executive (Monitoring Officer) and the Commissioner's Chief Finance Officer. The Joint Audit and Standards Committee for the Cumbria OPCC and Cumbria Constabulary is an independent

Committee fulfilling an assurance role in support of the overall arrangements for governance. The terms of reference of the Committee, in accordance with the recommendations of the CIPFA publication “Audit Committees Practical Guidance for Police and Local Authorities” incorporate review of the Internal Audit Charter. ‘Senior management’ refers to the Police and Crime Commissioner, Chief Executive and Chief Finance Officer for the OPCC and for Cumbria Constabulary the Chief Officer Group.

The Role of Internal Audit

- 2.1 Internal Audit is an independent, objective assurance and consulting service designed to add value and improve the Commissioner and Chief Constable’s operations. Internal Audit helps the Commissioner and Chief Constable to accomplish their objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. Arrangements for internal audit are secured by the Commissioner’s Chief Finance Officer on behalf of the Commissioner and Chief Constable through the Cumbria shared Internal Audit Service.
- 2.2 The Cumbria Shared Internal Audit Service (“Internal Audit”) provides an Internal Audit function for each of the organisations that form part of the shared service, namely;
 - Cumbria County Council (the host authority)
 - Carlisle City Council
 - Copeland Borough Council
 - Cumbria Constabulary and the Cumbria Office of the Police and Crime Commissioner
- 2.3 The services provided by Internal Audit are designed to assist the Commissioner and Chief Constable to continually improve the effectiveness of their respective risk management, control and governance framework and processes and to allow an independent, annual opinion to be provided on the adequacy of these arrangements.
- 2.4 Internal Audit activities in support of this include:
 - Planning and undertaking an annual programme of risk-based Internal Audit reviews focusing on risk management, internal control and governance
 - Review of arrangements for preventing, detecting and dealing with fraud and corruption
 - Review of overall arrangements for risk management and corporate governance

- Review of grant funded expenditure where assurance is required by funding bodies or where risks are considered to be high
- Provision of advice on risk and control related matters
- Consultancy services which may include hot assurance on projects or service and system development
- Investigation of suspected fraud or irregularity or provision of advice and support to management in undertaking an investigation
- Advice on strengthening controls following such an incident

Purpose, Authority, Responsibility and Objectives

Purpose

- 3.1 Internal audit is described by the Chartered Institute of Internal Auditors as a key component of corporate governance. When properly resourced, positioned and targeted, internal auditors act as invaluable eyes and ears for Senior Management, the Board and Audit Committees inside their organisations, giving an unbiased and objective view on what's happening in the organisation.
- 3.2 Internal Audit's core purpose is to provide Senior Management, the Joint Audit and Standards Committee and the Executive Board with independent, objective assurance that their respective organisations have adequate and effective systems of risk management, internal control and governance.
- 3.3 By undertaking an annual risk assessment and using this to prepare the annual risk-based audit plan, Internal Audit is able to target resources at the areas identified as highest risk to the Commissioner and Chief Constable. This then allows Internal Audit to give an overall opinion on the Commissioner and Chief Constable's systems of risk management, internal control and governance.
- 3.4 The annual report and opinion is a mandatory requirement and is a key contributor to the Commissioner and Chief Constable's Annual Governance Statements which accompany the annual statement of accounts. The Governance Statement provides assurance that an effective internal control framework is in place.

- 3.5 Internal Audit supports the respective Section 151 Officers to discharge their responsibilities under section 151 of the Local Government Act 1972, the Accounts and Audit Regulations 2015 and the CIPFA Statement on the Role of the Chief Finance Officer of the Police and Crime Commissioner and the Chief Finance Officer of the Chief Constable. This Statement places on the Chief Finance Officers, the responsibility for ensuring that the Commissioner and Chief Constable have put in place effective arrangements for internal audit of the control environment and systems of internal control as required by professional standards.
- 3.6 Internal Audit supports the Chief Executive and Chief Constable in providing high level assurances relating to the OPCC and Constabulary's Governance arrangements.
- 3.7 Internal Audit also supports the Monitoring Officer in discharging his / her responsibilities for maintaining high standards of governance, conduct and ethical behaviour.

Authority

- 3.8 This charter provides the authority for Internal Audit's right of access to all activities, premises, records, personnel, cash and stores as deemed necessary to undertake agreed internal audit assignments. In approving this charter, the Commissioner and Chief Constable have approved this right of access and therefore the responsibility of all officers to comply with any reasonable request from members of the Cumbria Shared Internal Audit service.
- 3.9 This charter delegates to the Audit Manager for the Commissioner and Chief Constable, the responsibility to undertake an annual risk assessment in consultation with each organisation's management, and from this, prepare a risk based plan of audit work for review by the Joint Audit and Standards Committee and approval by the Executive Board.
- 3.10 Internal Audit shall have the authority to undertake audit work as necessary within agreed resources so as to achieve audit objectives. This will include determining the scope of individual assignments, selecting areas and transactions for testing and determining appropriate key contacts for interview during audit assignments.
- 3.11 The charter establishes that the Group Audit Manager and Audit Manager of the Shared Internal Audit Service has free and unfettered access to the Executive Board and the Joint Audit and Standards Committee and has the right to request a meeting in private with the

Commissioner, Chief Constable and/or Chair of the Joint Audit and Standards Committee should it become necessary.

Responsibilities and Objectives

3.12 Internal audit's primary objective is to undertake an annual programme of internal audit work that allows an annual opinion to be provided on the overall systems of risk management, internal control and governance for the Commissioner and Chief Constable.

3.13 The Audit Manager and her staff have responsibility for the following areas:

Planning

- Develop an annual internal audit plan using a risk based methodology, based on at least an annual assessment of risk and incorporating risks and concerns identified by senior management
- Submit the annual audit plan to senior management and the Joint Audit and Standards Committee for review prior to approval by the Executive Board.
- Review agreed audit plans in light of new and emerging risks and report any necessary amendments to agreed plans to the Joint Audit and Standards Committee and Executive Board as appropriate.

Implementation

- Deliver the approved annual programme of internal audit work and report the outcomes in full to senior management (as agreed at the scoping stage of each engagement) and to the Joint Audit and Standards Committee
- Monitor implementation of agreed audit recommendations through follow up process and report the outcomes to Senior Management and the Joint Audit and Standards Committee

Reporting

- Any significant issues arising during audit fieldwork will be discussed with management as they are identified
- Draft audit reports will be produced on a timely basis following all audit reviews and these will be discussed with management prior to finalising, to ensure the factual accuracy of the report and incorporate management responses
- Quarterly progress reports will be prepared and reported formally to the Joint Audit and Standards Committee

- Internal Audit has a responsibility to report to the Executive Board any areas where there is considered that management have accepted a level of risk that may be unacceptable to the organisation
- Internal Audit has a duty to bring to the attention of the Executive Board and the Joint Audit and Standards Committee should the Group Audit Manager believe that the level of agreed resources will impact adversely on the provision of the annual audit opinion

Relationships with other Inspectorates

- Internal Audit will maintain effective relationships with other providers of assurance and external inspectorates in order to avoid duplication of effort and enable Internal Audit, where appropriate, to place reliance on the work of other providers

Non-Audit / management responsibilities

In order for Internal Audit to maintain its independence and thereby provide an independent and objective opinion, there are a number of areas that internal audit is not responsible for:

- Internal Audit does not have any operational responsibilities
- Internal Audit does not have any part in decision making within the organisation or for authorising transactions
- Internal Audit is not responsible for implementing its recommendations or for ensuring that these are implemented

3.14 The presence of Internal Audit does not in any way detract from management's responsibilities for maintaining effective systems of governance, risk management and internal control.

3.15 Internal Audit does not have responsibilities for preventing or detecting fraud or error, this is the responsibility of the management of the respective organisations. Internal Audit's role is to provide senior management, the Executive Board and the Joint Audit and Standards Committee with assurance that the management of the organisation have themselves established procedures that allow them to prevent or detect fraud or error and to respond appropriately should this occur.

3.16 It is the responsibility of the Commissioner and Chief Constable's management to maintain adequate systems of internal control and to review their systems to ensure that these controls continue to operate effectively.

3.17 The role of Internal Audit vs the Management of the organisation is summarised in the diagram at appendix A.

Scope of Internal Audit Work

4.1 The scope of Internal Audit work covers the entire systems of risk management, internal control and governance across each participating organisation. This allows Internal Audit to provide assurance that appropriate arrangements are in place to ensure that:

- The organisations risks are being appropriately identified, assessed and managed;
- Information is accurate, reliable and timely;
- Employees' actions are in compliance with expected codes of conduct, policies, laws and procedures;
- Resources are utilised efficiently and assets are secure;
- The organisations plans, priorities and objectives are being achieved;
- Legal and regulatory requirements are being met

Position and Reporting Lines for Internal Audit

5.1 Internal Audit reports operationally to the PCC's Chief Finance Officer (S151 Officer). Functional reporting is to the Joint Audit and Standards Committee.

5.2 On a day to day basis Internal Audit will report the outcomes of its work to the senior officer responsible for the area under review. Progress and performance of Internal Audit will be monitored by the PCC's Chief Finance Officer and the Chief Constable's Chief Finance Officer who are charged with ensuring each organisation has put in place effective arrangements for Internal Audit of the control environment and systems of internal control as required by professional standards.

5.3 Internal Audit reports the outcomes of its work to the Joint Audit and Standards Committee on a quarterly basis. This includes as a minimum, a progress report summarising the outcomes of Internal Audit engagements as well as the performance of Internal Audit against the approved plan of work. Where audit activity has raised significant matters with regard to weaknesses in internal control, defined as audit reports providing either only 'limited/none' or 'partial' assurance or recommendations graded 'High', indicating significant risk exposure identified

arising from a fundamental weakness in the system of internal control, reports will be escalated by the Chief Finance Officer to the Executive Board.

5.4 On an annual basis, Internal Audit will prepare and present to the Executive Board and Joint Audit and Standards Committee, an annual report containing:

- The overall opinion of the responsible Audit Manager
- A summary of the work undertaken to support the opinion; and
- A statement of conformance with the Public Sector Internal Audit Standards

5.5 Should significant matters arise in relation to the work of Internal Audit; these will be escalated through the management hierarchy to the Commissioner, Chief Constable and/or to the Chair of the Joint Audit and Standards Committee as appropriate.

5.6 Where major changes are required to the agreed audit plan or Internal Audit is required to divert resource to urgent non-planned work, this will be agreed with the PCC's Chief Finance Officer and reported to the Executive Board and Joint Audit and Standards Committee. All changes to approved audit plans will be reported to the next meeting of the Joint Audit and Standards Committee.

Ethics, Independence and Objectivity

Ethics

6.1 Internal Audit works to the highest standards of ethics and has a responsibility to both uphold and promote high standards of behaviour and conduct.

6.2 All internal auditors working within the UK public sector are now required to comply with the mandatory Code of Ethics contained within the new Public Sector Internal Audit Standards. As such this code has been adopted by the Shared Internal Audit Service and all staff will be requested to sign up to the Code on an annual basis. Auditors within the shared service are also required to comply with the code of ethics of their professional bodies.

Governance and Independence of the Shared Internal Audit Service

6.3 Internal Audit is a Shared Audit Service between Cumbria County Council, Carlisle City Council, Copeland Borough Council, Cumbria Constabulary and the Police and Crime Commissioner. The host authority for the delivery of the Shared Audit Service is Cumbria County Council.

6.4 The governance of the provision of the Shared Internal Audit Service shall be carried out by the Shared Service Board whose role is to:

- Ensure that the Shared Internal Audit Service meets the requirement of the proper practices for Internal Audit
- Reach common agreement over issues such as standards, goals and objectives and reporting requirements
- Agree on the range of audit outputs
- Confirm the scope and remit of the audit function
- Agree reporting and performance arrangements for Internal Audit, including performance measures, delivery of plan, cost and impact tracking

Independence

6.5 Internal Audit is independent of all of the activities it is required to audit which ensures that the Executive Board and Joint Audit and Standards Committee can be assured that the annual opinion they are given is independent and objective. Whilst the Audit Manager reports operationally to the PCC's Chief Finance Officer, there is also a functional reporting line to the Executive Board and the Joint Audit and Standards Committee and the Audit Manager has direct access to the Commissioner, Chief Constable and the Chair of the Joint Audit and Standards Committee.

6.6 Internal auditors will not undertake assurance work in areas for which they had operational responsibility during the previous 12 months.

6.7 Internal auditors will report annually to the Executive Board and Joint Audit and Standards Committee to confirm that the independence of Internal Audit is being maintained.

Resourcing, Proficiency and Due Professional Care

6.8 For Internal Audit to provide an opinion to the Commissioner and Chief Constable there must be a sufficiently resourced team of staff with the appropriate mix of skills and qualifications. Resources must be effectively deployed to deliver the approved programme of work.

6.9 It is the responsibility of each organisation to ensure that it approves a programme of audit work sufficient to provide an adequate level of assurance over their systems of risk management, internal control and governance.

6.10 In line with the requirements of the Standards, in the event that the Audit Manager considers that the level of agreed resources will impact adversely on the provision of the annual internal audit opinion, the consequences will be brought to the attention of the Executive Board and the Joint Audit and Standards Committee.

6.11 In line with the requirements of the PSIAS and the CIPFA Statement on the Role of the Head of Internal Audit 2010, the Group Audit Manager and Audit Manager are professionally qualified and appropriately experienced.

The Role of Internal Audit in Fraud-related work

6.12 The PSIAS require that the role of Internal Audit in any fraud-related work is defined within the audit charter.

6.13 It is a requirement of the arrangements for Anti-fraud and Corruption within the COPCC and Constabulary that Internal Audit will be made aware of any actual incidence of fraud and corruption and will undertake a review where necessary with regard to providing assurance on any associated weaknesses within internal control. The arrangements for the Commissioner provide for internal audit to undertake any necessary investigation.

Advice / Consultancy work

6.14 Where Internal Audit is requested to provide advice, consultancy or investigatory work, the request will be assessed by the Audit Manager. Such assignments will be accepted only where it is considered the following criteria are met:

- The work requested can be accommodated within the agreed audit days and Internal Audit has the skills to deliver the work

- The assignment will contribute to strengthening the control framework
- No conflict of interest could be perceived from Internal Audit's acceptance of the assignment

6.15 In line with the PSIAS, approval will be sought from the Executive Board for any significant additional consulting services not already included in the audit plan prior to accepting the engagement.

Management Responsibilities

7.1 For Internal Audit to be fully effective, it needs the full commitment and cooperation from the Commissioner and Chief Constable's senior management. In approving this charter, the Executive Board is mandating management to cooperate with Internal Audit in the delivery of the service by:

- Attending audit planning and scoping meetings and agreeing terms of reference for individual audit assignments on a timely basis
- Sponsoring each audit assignment at Chief Officer level or above
- Providing Internal Audit with full support and cooperation, including complete access to all records, data, property and personnel relevant to the audit assignment on a timely basis
- Responding to Internal Audit reports and making themselves available for audit closeout meetings to agree draft audit reports
- Implementing audit recommendations within agreed timescales

7.2 Instances of non-cooperation with reasonable audit requests will be escalated through the S151 Officers and ultimately to the Executive Board if necessary.

7.3 While Internal Audit is responsible for providing independent assurance to the Commissioner and Chief Constable, it is the responsibility of management to develop and maintain appropriately controlled systems and operations. Internal Audit does not remove the responsibility from management to continually review the systems and processes for which they are responsible and to provide their own assurance to senior management that they are maintaining appropriately controlled systems.

Quality Assurance

8.1 Public Sector Internal Audit Standards require that the Internal Audit function is subject to a quality assurance and improvement programme that must include both internal and external assessments. Internal Audit will report the outcomes of quality assessments to the Joint Audit and Standards Committee through its regular reports.

Internal assessments

8.2 All internal audit reviews are subject to management quality review to ensure that the work meets the standards expected for audit staff. Such management review will include:

- Ensure the work complies with the PSIAS
- Work is planned and undertaken in accordance with the level of assessed risk
- Appropriate testing is undertaken to support the conclusions drawn

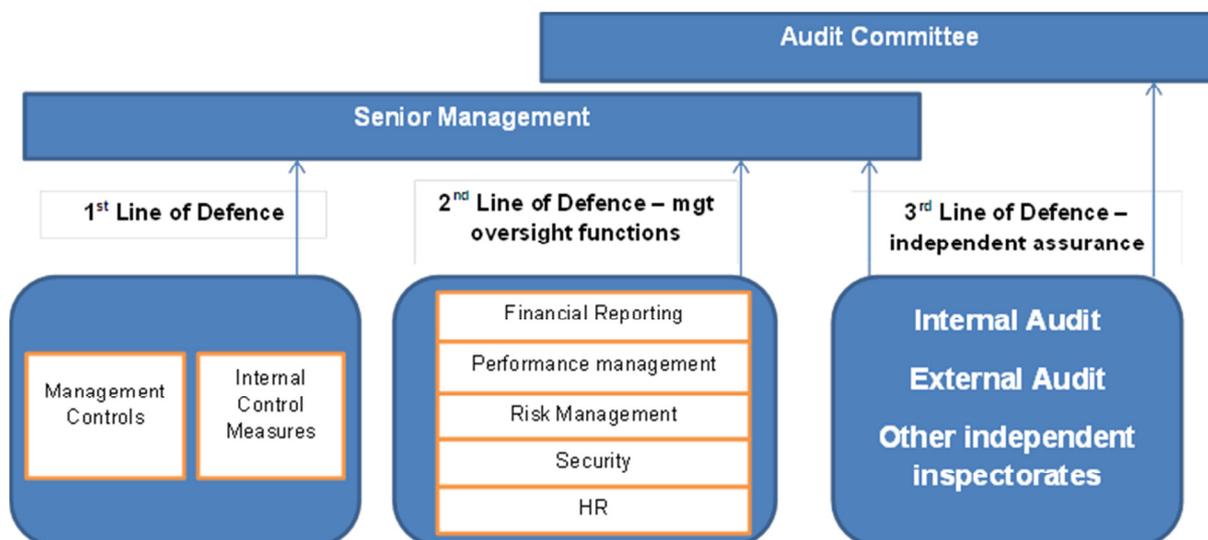
External assessments

8.3 An external assessment must be conducted at least every five years by a qualified, independent assessor from outside the organisation. The Group Audit Manager will discuss options for the assessment with the Shared Services Board before making recommendations for approval by the respective Executive Board/Audit Committees.

Review of Audit Charter

9.1 The charter will be reviewed annually and submitted to Senior Management and the Joint Audit and Standards Committee for review prior to approval by the Executive Board alongside the annual audit plan.

Internal Audit – The Third Line of Defence



The above diagram demonstrates the three lines of defence in ensuring that organisations are adequately managing their risks.

The first line of defence comprises the arrangements that operational management have implemented to ensure risks are identified and managed. These include the controls that are in place within systems and processes together with the management and supervisory oversight designed to identify and correct any issues arising.

The second line of defence refers to the strategic oversight arrangements that are designed to provide management with information to confirm that the controls in the first line of defence are operating effectively. For example the risk management policies and strategies that determines how risks within the organisation will be identified, assessed and managed and the reporting arrangements to confirm that these policies and strategies are being appropriately implements and complied with.

Internal audit forms the third line of defence alongside other independent providers of assurance. The role of internal audit is to provide the senior management and Commissioner and Chief Constable with assurance that the arrangements within the first and second lines of defence are adequate and working effectively to manage the risks faced by their respective organisations.

Internal Audit Performance Measures

KPI	Measure of Assessment	Target (and frequency of measurement)	Why is this important / rationale
Annual Measures to be reported in the Annual Report			
Output Measures			
Compliance with Public Sector Internal Audit Standards	Quality Assurance and Improvement Programme & checklist for assessing conformance with the PSIAS	100%. On-going and annual review to demonstrate conformance with the definition of Internal auditing, code of ethics and standards.	The internal audit service is required to comply with the PSIAS
Preparation of audit plan	Preparation of risk based audit plan to meet client timetables	100%. Measured annually	Annual agreed audit plan is required to enable delivery for the client.
People Measures			
CPD / Training	Average number of days for skills training per auditor	6 days per person. Reported annually.	CPD is a requirement of the PSIAS. An appropriately skilled workforce will ensure that staff within Internal Audit are continuously improving and adding value to the service provided to clients.

KPI	Measure of Assessment	Target (and frequency of measurement)	Why is this important / rationale
Monthly management measures to be reported to Audit Committees Quarterly			
Output Measures			
Planned audits completed	% of planned audit reviews (or approved amendments to the plan) completed in respect of the financial year.	95% (annual per shared service agreement, 95% target reflects need for audit plans to be dynamic and respond to emerging risks). This indicator will be monitored and reported quarterly to ensure the plan is on track to be delivered.	To enable an annual opinion to be provided on the overall systems of risk management, governance and internal control.
Audit scopes agreed	% of audit scopes agreed with management and issued before commencement of the audit fieldwork	100% Measured monthly Reported quarterly	To ensure the audit is targeted to key risks, has management buy in and adds value. Recommended in the Grant Thornton review of Internal Audit.
Draft reports issued by agreed deadline	% of draft internal audit reports issued by the agreed deadline or formally approved revised deadline agreed by Audit Manager and client.	80% (target is a reflection that this is a new way of working and deadlines may be impacted by several factors including client availability) Measured monthly Reported quarterly	Timely reports add impact & this was a recommendation in the Grant Thornton report.
Timeliness of final reports	% of final internal audit reports issued for Corporate Director comments within 5 working days of management response or closeout.	90% (target recognises that there may on occasion be delays in finalising reports, e.g. where further work is required to resolve matters identified at closeout meeting) Measured monthly.	Timely reports add impact & this was a recommendation in the Grant Thornton report.

KPI	Measure of Assessment	Target (and frequency of measurement)	Why is this important / rationale
		Reported quarterly	
Recommendations agreed	% of recommendations accepted by management	95% quarterly benchmark (the benchmark reflects that it is management's responsibility to assess their risks and take final decision on whether risk may be accepted)	Measures the quality and effectiveness of internal audit recommendations
Follow up	% of high priority audit recommendations implemented by target date	100% Quarterly	Indicates that Internal Audit are adding value to the organisation.
Assignment completion	% individual reviews completed to required standard within target days or prior approved extension by Audit Manager	75% (target reflects that this is a new way of working for the audit service and systems for monitoring time spent on assignments may need to be further developed) Measured monthly. Reported quarterly.	To ensure that all audit plans across the shared service can be delivered.
Quality Assurance checks completed	% QA checks completed	100%. Measured monthly Reported quarterly	To ensure compliance with the Public Sector Internal Audit Standards. Provides on going feedback to the audit team and identifies areas of good practice and areas for improvement
Customer Measures			
Post audit customer satisfaction survey	% of customer satisfaction surveys scoring the service as	80% (target reflects the need for internal audit to strive to deliver a customer focused service, but that due to the nature of internal audit roles	Gauge customer satisfaction and continuously improve the audit service.

KPI	Measure of Assessment	Target (and frequency of measurement)	Why is this important / rationale
feedback	'good'	and responsibilities, may not always elicit positive feedback) Measured monthly. Reported quarterly	
People Measures			
Efficiency	% chargeable time	80% (target takes account of non-chargeable activities such as staff holidays, service development projects and team meetings. Measured monthly. Reported quarterly	Measure of productivity.

Internal Audit Approach to Follow Up

It is a requirement of the PSIAS that the head of internal audit maintains a system to follow up the implementation of agreed actions from internal audit work.

In order to ensure the most effective use of resources, internal audit will follow up the implementation of agreed actions arising from all audits that result in partial or limited assurance.

Follow up will be undertaken approximately six months after the issue of the final audit report or in line with the latest agreed timescales for implementation. Where appropriate a revised audit opinion will be issued and reported to Joint Audit & Standards Committee.

Internal audit do not propose to follow up audit reviews where the initial assessment is reasonable or substantial as there is little merit in directing further audit resources at areas deemed to be effectively controlled.

Where a follow up is due, but management advise that all actions have not been fully implemented, the follow up will be deferred for a maximum of a month to allow actions to be fully implemented. Internal audit will undertake one follow up and the outcomes will be reported to Joint Audit & Standards Committee. Where the follow up does not allow for a revised audit opinion, the Chief Officer / Director will be informed and requested to continue to monitor the implementation within the directorate. A summary report will be provided to Joint Audit & Standards Committee. Internal audit will write to the Chief Officer / Director after a further six months to gain assurance that the remaining actions have been implemented.

Wherever possible, follow ups will be undertaken in the same year as the original audit in order that revised assurance can be incorporated within the annual report and opinion.

Joint Audit Plan for the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary

Year ending 31 March 2016

March 2016

Fiona Blatcher

Associate Director

T 0161 234 6393 or 07880 456196

E fiona.c.blatcher@uk.gt.com

Richard McGahon

Senior Manager

T 0141 223 0889 or 07880 456156

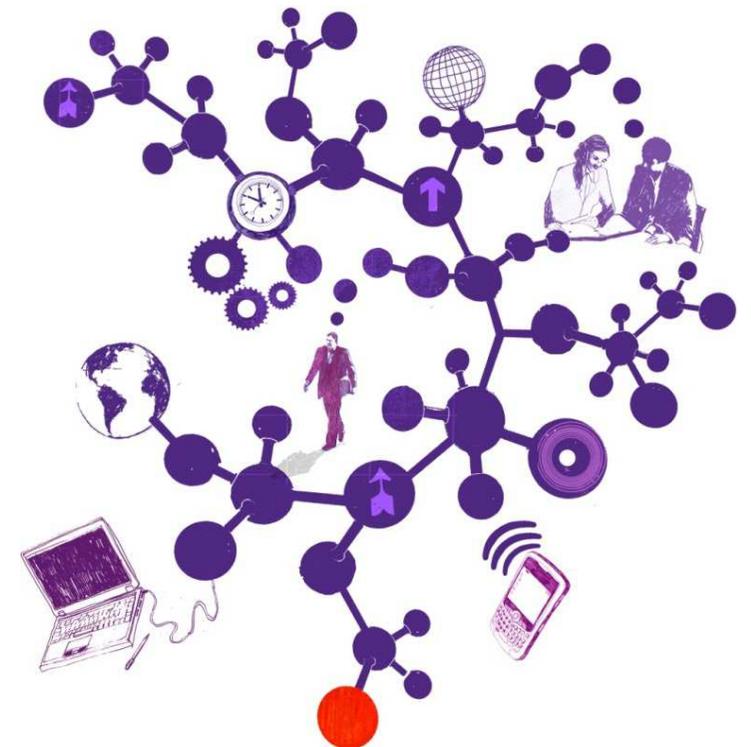
E richard.a.mcghon@uk.gt.com

Richard Robinson

Assistant Manager

T 0141 223 0888 or 07901 878386

E richard.robinson@uk.gt.com



The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the PCC or Chief Constable or any weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.



The Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary
Carleton Hall
PENRITH
Cumbria
CA10 2AU

March 2016

Dear Richard and Jerry

Grant Thornton UK LLP
4 Hardman Square
Spinningfields
Manchester
M3 3EB

T +44 (0161) 234 6393
www.grant-thornton.co.uk

Joint Audit Plan for Police and Crime Commissioner for Cumbria and Chief Constable for Cumbria Constabulary for the year ending 31 March 2016

This joint Audit Plan sets out, for the benefit of those charged with governance (in this case, the Police and Crime Commissioner (PCC) for the office of the PCC, and the Chief Constable for Cumbria Constabulary), an overview of the planned scope and timing of the audit, as required by International Standard on Auditing (UK & Ireland) 260. This document is to help you understand the consequences of our work, discuss issues of risk and the concept of materiality with us, and identify any areas where you may request us to undertake additional procedures. The contents of the Plan have been discussed with management.

We are required to perform our audit in line with the Local Audit and Accountability Act 2014 and in accordance with the Code of Practice issued by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General in April 2015.

Our responsibilities under the Code are to:

- give an opinion on the financial statements of the Chief Constable, the PCC and the Group
- satisfy ourselves that the Police and Crime Commissioner and the Chief Constable have each made proper arrangements for securing economy, efficiency and effectiveness in their use of resources.

As auditors we are responsible for performing the audit, in accordance with International Standards on Auditing (UK & Ireland), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance (the PCC and Chief Constable for the OPCC and Constabulary, respectively). The audits of the financial statements do not relieve management or those charged with governance, for each organisation, of their responsibilities for the preparation of the financial statements.

Yours sincerely

Fiona Blatcher

Engagement Lead

Chartered Accountants

Grant Thornton UK LLP is a limited liability partnership registered in England and Wales: No.OC307742. Registered office: Grant Thornton House, Melton Street, Euston Square, London NW1 2EP. A list of members is available from our registered office. Grant Thornton UK LLP is authorised and regulated by the Financial Conduct Authority.
Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. Services are delivered by the member firms. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions. Please see grant-thornton.co.uk for further details.

Contents

Section	Page
Understanding your business	5
Developments and other requirements relevant to the audit	6
Our audit approach	7
Materiality	8
Significant risks identified	9
Other risks identified	11
Group audit scope and risk assessment	14
Value for Money	15
Key dates	17
Fees and independence	18
Communication of audit matters with those charged with governance	19

Understanding your business

In planning our audit we need to understand the challenges and opportunities the Police and Crime Commissioner and Chief Constable are facing. We set out a summary of our understanding below.

Challenges/opportunities

1. Autumn Statement 2015 and financial health

- Although the expectation for the Autumn Statement was for significant cuts in policing spend, the Chancellor proposed that there would be no real terms reduction in funding to policing over the next five years.
- For Cumbria there was a cash reduction of £341,000 between 2015/16 and 2016/17.
- The review of formula funding is however more challenging. Current estimates range from a reduction of £9.9 million to £15.8m. A further reduction of up to £1.4 million would occur if legacy council tax funding is included in the new formula.

2. On-going Public Sector challenges

- Despite the Autumn Statement not including the expected levels of cuts there remains a strong case for change to meet existing financial challenges, improve performance and improve the delivery of high quality policing services in a more effective and cost efficient way.
- The Constabulary has in place a well established 'Change Strategy' to deliver its strategic approach to delivering spending reductions.

3. Collaboration and Partnerships

- The Autumn Statement 2015 also included proposals to devolve further powers to localities
- Increasing partnerships forms an integral role in achieving your police and crime plan in relation to criminal justice and victims
- Collaborating with local authorities, along with the wider criminal justice system, has increased focus on prevention and multi-agency working.

4. Police and Crime Commissioner election

- A new Police and Crime Commissioner will be elected on 5 May 2016. In light of this there will be a need for an effective plan to manage the transition to a new PCC
- The existing Police and Crime Plan will need to be evaluated and draw on lessons learnt, whilst preparing the design for a new one.



Our response

- We will consider each of the Police and Crime Commissioner's and the Chief Constable's plans and financial positions as part of our work to inform our VFM conclusion.

- We will consider your arrangements for monitoring delivery of your current plans as part of our work in reaching our VFM conclusion.
- We will share our knowledge of how other parts of the sector are responding to these changes.

- We will review arrangements for existing and potential collaborations as part of our work in reaching our VFM conclusion.

- We will consider your plans for the effective transition to a new Police and Crime Commissioner.

Developments and other requirements relevant to your audit

In planning our audit we also consider the impact of key developments in the sector and take account of national audit requirements as set out in the Code of Audit Practice and associated guidance.

Developments and other requirements

1. Corporate governance

- The Accounts and Audit Regulations 2015 require authorities to produce a Narrative Statement, which reports on your financial performance and use of resources in the year, and replaces the explanatory foreword.
- You are required to produce an Annual Governance Statement (AGS) as part of each of the Police and Crime Commissioner's and Chief Constable's financial statements.

2. Fair value accounting

- A new accounting standard on fair value (IFRS 13) has been adopted and applies for the first time in 2015/16.
- This will have a particular impact on the valuation of surplus assets within property, plant and equipment which are now required to be valued at fair value in line with IFRS 13 rather than the existing use value of the asset.
- There are a number of additional disclosure requirements of IFRS 13.

3. Earlier closedown of accounts

- The Accounts and Audit Regulations 2015 require authorities, including PCCs and Chief Constables, to bring forward the approval and audit of financial statements to 31 May and 31 July respectively by the 2017/18 financial year.
- Cumbria PCC and Chief Constable achieved the 31 May deadline for 2014/15 and are committed to achieving this for 2015/16.

4. PEEL review

- In February 2016 Her Majesty's Inspectorate of Constabulary (HMIC) published its second PEEL (police effectiveness, efficiency and legitimacy) assessment of how well Cumbria Constabulary keeps people safe and reduces crime.
- Cumbria Constabulary was assessed as 'Good' for efficiency and legitimacy but its effectiveness was assessed as 'Requires Improvement'.



Our response

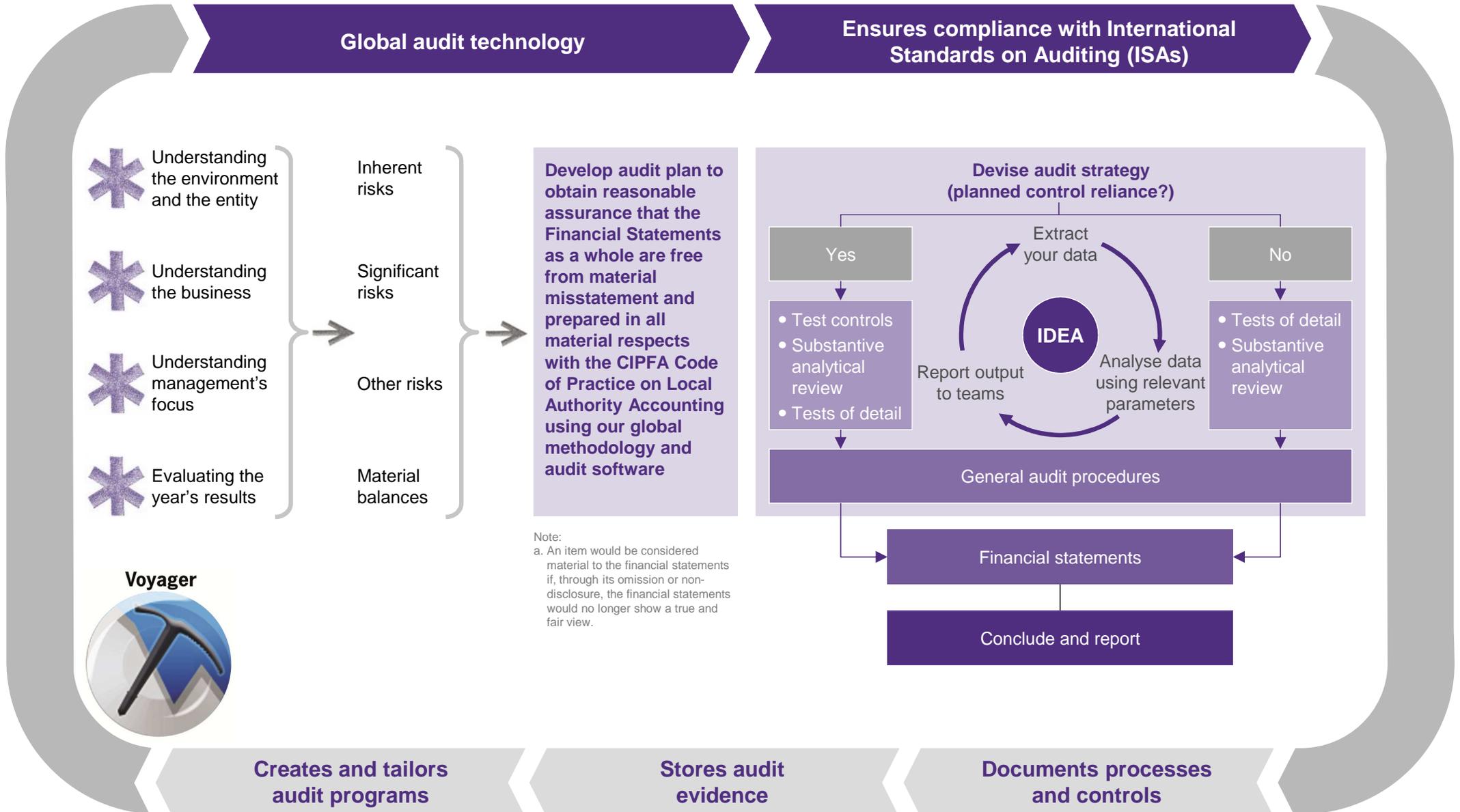
- We will review your Narrative Statements to assess whether they reflect the requirements of the CIPFA Code of Practice when this is updated, and make recommendations for improvement.
- We will review your arrangements for producing the AGS's and consider whether they are consistent with our knowledge, and the requirements of CIPFA guidance.

- We will keep the PCC informed of changes to the financial reporting requirements for 2015/16 through ongoing discussions and invitations to our technical update workshops.
- We will discuss this with you at an early stage whether you are likely to have any surplus assets. Where relevant we will review the basis of valuation of your surplus assets and investment property assets to ensure they are valued on the correct basis..

- We will continue to work with you to identify areas of your accounts where we can do early testing. We aim to complete all substantive work in our audit of your financial statements earlier than the current statutory deadlines in preparation for early close deadlines moving forward.
- We will report our audit finding to the Joint Audit and Standards Committee on 28 July 2016.

- We will consider your arrangements for responding to the PEEL review and monitoring delivery of your improvement plan as part of our work in reaching our VFM conclusion.

Our audit approach



Materiality

In performing our audit, we apply the concept of materiality, following the requirements of International Standard on Auditing (UK & Ireland) (ISA) 320: Materiality in planning and performing an audit.

The standard states that 'misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements'.

As is usual in public sector entities, we have determined materiality for the statements as a whole as a proportion of the gross revenue expenditure of the Police and Crime Commissioner and gross revenue expenditure of the Chief Constable. For the purposes of planning the audit we have determined overall materiality for each to be 2% of the relevant gross relevant expenditure as shown in the table below:

Materiality	PCC (Single Entity)	Chief Constable (Single Entity)	PCC (Group Accounts)
Materiality (2% of gross revenue expenditure)	£2,687,000	£2,957,000	£3,336,000

We will consider whether these levels are appropriate during the course of the audit and will advise you if we revise them.

Under ISA 450, auditors also set an amount below which misstatements would be clearly trivial and would not need to be accumulated or reported to those charged with governance because we would not expect that the accumulation of such amounts would have a material effect on the financial statements. "Trivial" matters are clearly inconsequential, whether taken individually or in aggregate and whether judged by any criteria of size, nature or circumstances. We have defined the amount below which misstatements would be clearly trivial to be £101,000 (PCC – Single entity), £111,000 (Chief Constable – Single entity) and £125,000 (PCC – Group accounts).

ISA 320 also requires auditors to determine separate, lower, materiality levels where there are 'particular classes of transactions, account balances or disclosures for which misstatements of lesser amounts than materiality for the financial statements as a whole could reasonably be expected to influence the economic decisions of users'.

We have identified the following items where we will undertake audit procedures as these are key figures/disclosures in the accounts that should be correct:

Balance/transaction/disclosure	Explanation
Cash and cash equivalents	The balance of cash and cash equivalents was material last year. All transactions made by the PCC affect the balance and whether the actual figure is material or not it is considered to be material by nature.
Disclosures of officers' remuneration, salary bandings and exit packages in notes to the statements	Due to public interest in these disclosures and the statutory requirement for them to be made.
Disclosure of auditors' remuneration in notes to the statements	This is a statutory requirement and a requirement of ethical and auditing standards.
Disclosure of related party transactions in the notes to the statements	Due to public interest in these disclosures.

Significant risks identified

"Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, either due to size or nature, and that therefore occur infrequently. Judgmental matters may include the development of accounting estimates for which there is significant measurement uncertainty" (ISA 315). In this section we outline the significant risks of material misstatement which we have identified. The two presumed significant risks which are applicable to all audits under auditing standards (International Standards on Auditing - ISAs) which are shown on this page.

Significant risk	Relevant to PCC / Chief Constable / Both?	Description	Substantive audit procedures
The revenue cycle includes fraudulent transactions	Both	<p>Under ISA 240 there is a presumed risk that revenue may be misstated due to the improper recognition of revenue.</p> <p>This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.</p>	<p>Having considered the risk factors set out in ISA240 and the nature of the revenue streams, we have determined that the risk of fraud arising from revenue recognition can be rebutted for both the PCC and Chief Constable because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate revenue recognition • for the PCC opportunities to manipulate revenue recognition are very limited as revenue is principally grant allocations from central and local government • for the Chief Constable opportunities to manipulate revenue recognition are very limited as revenue is principally an inter-group transfer from the PCC, with no cash transactions • the culture and ethical frameworks of local government bodies, including Cumbria PCC and Chief Constable, mean that all forms of fraud are seen as unacceptable.
Management over-ride of controls	Both	Under ISA 240 it is presumed that the risk of management over-ride of controls is present in all entities.	<p>Work completed to date:</p> <ul style="list-style-type: none"> • Updating our understanding of accounting estimates, judgments and decisions made by management <p>Further work planned:</p> <ul style="list-style-type: none"> • Review and challenge of significant accounting estimates, judgments and decisions made by management • Detailed testing of high risk journal entries • Review accounting treatment for significant, unusual transactions

Significant risks identified (continued)

Significant risk	Relevant to PCC / Chief Constable / Both?	Description	Substantive audit procedures
Valuation of the Private Finance Initiative (PFI) asset and associated liability	PCC	<p>In accounting for the PFI contract it was assumed that there was reasonable certainty that the Commissioner would exercise the right to purchase the building at the end of the original 25 year contract for half of its market value. As such the PFI land and building were recognised as property, plant and equipment in the Commissioner's balance sheet at full value. In addition, a liability for outstanding obligations to pay for the building, which includes the cost of purchasing the asset for half its market value at the end of the PFI period are also shown on the balance sheet.</p> <p>Given the flooding in Cumbria in December 2015 the future of the PFI building is less certain. This means that the accounting for the PFI asset and Liability may change.</p>	<p>Work planned:</p> <ul style="list-style-type: none"> • Discuss with officers the current view on the future of the PFI asset • Review the PCC's consideration of the accounting implications of any changes to the view of the future of the PFI asset. • Review and test any resultant changes to accounting treatment and disclosures.
Valuation of pension fund net liability	Both	<p>The Local Government Pension Scheme (LGPS) pension net liability as reflected in the balance sheet, and asset and liability information disclosed in the notes to the accounts, represent significant estimates in the financial statements. These estimates by their nature are subject to significant estimation uncertainty, being very sensitive to small adjustments in the assumptions used.</p> <p>The Police Officer Pension schemes pension fund liability as reflected in its balance sheet and notes to the accounts represent significant estimates in the financial statements. These estimates by their nature are subject to significant estimation uncertainty, being very sensitive to small adjustments in the assumptions used.</p>	<p>Work planned:</p> <ul style="list-style-type: none"> • We will identify the controls put in place by management to ensure that the pension net liability is not materially misstated. We will also assess whether these controls were implemented as expected and whether they are sufficient to mitigate the risk of material misstatement • We will review the competence, expertise and objectivity of the actuaries who carry out your pension fund valuation. We will gain an understanding of the basis on which the valuations are carried out • We will undertake procedures to confirm the reasonableness of the actuarial assumptions made • We will review the consistency of the pension fund asset (LGPS only) and liabilities disclosures in the notes to the financial statements with the actuarial report from your actuary.

Other risks identified

"The auditor should evaluate the design and determine the implementation of the entity's controls, including relevant control activities, over those risks for which, in the auditor's judgment, it is not possible or practicable to reduce the risks of material misstatement at the assertion level to an acceptably low level with audit evidence obtained only from substantive procedures"(ISA (UK & Ireland) 315).

In this section we outline the other risks of material misstatement which we have identified as a result of our planning.

Other risks	Relevant to PCC / Chief Constable / Both?	Description	Audit approach
Operating expenses	Both	Creditors understated or not recorded in the correct period (Operating expenses understated)	<ul style="list-style-type: none"> • Identification of controls and walkthrough testing of the operating expenses transaction cycle • Testing the reconciliation of operating expenditure recorded in the general ledger to the subsidiary systems and interfaces • Testing of payments made after the year-end to identify potential unrecorded liabilities and gain assurance over the completeness of the payables balance in the accounts • Substantive testing of operating expenses
Employee remuneration	Both	Employee remuneration expenses and accruals understated	<ul style="list-style-type: none"> • Identification of controls and walkthrough testing of the employee remuneration transaction cycle • Testing the reconciliation of payroll expenditure recorded in the general ledger to the subsidiary systems and interfaces • Analysis of trends and relationships to identify any anomalous areas for further investigation • Testing to confirm the completeness of payroll transactions and appropriate cut-off
Police Pensions Benefits Payable	Both	Benefits improperly computed / Claims liability understated	<ul style="list-style-type: none"> • Identification of controls and walkthrough testing of the pension benefit payments transaction cycle • Testing the reconciliation of pension benefit payments recorded in the general ledger to the subsidiary systems and interfaces • We will rationalise pensions paid with reference to changes in pensioner numbers and increases applied in the year together with a comparison of pensions paid on a monthly basis to ensure that any unusual trends are satisfactorily explained. • Substantive testing of monthly pension benefit payments made in the year • Substantive testing of lump sum pension benefit payments made in the year

Other risks identified (continued)

Other risks	Relevant to PCC / Chief Constable / Both?	Description	Audit approach
Valuation of property, plant and equipment	PCC	<p>The PCC revalues its assets on a rolling basis over a five year period.</p> <p>The Code requires that the PCC ensures that the carrying value at the balance sheet date is not materially different from current value. This represents a significant estimate by management in the financial statements.</p> <p>The floods in Cumbria in December 2015 has meant that several assets have been damaged. Work is on-going to repair the assets but some assets may still be impaired at 31/3/2016.</p>	<p>Work planned:</p> <ul style="list-style-type: none"> • Review of management's processes and assumptions for the calculation of the estimate • Review of the competence, expertise and objectivity of any management experts used • Review of the instructions issued to valuation experts and the scope of their work • Discussions with valuer about the basis on which the valuation is carried out and challenge of the key assumptions • Review and challenge of the information used by the valuer to ensure it is robust and consistent with our understanding • Testing of revaluations made during the year to ensure they are input correctly into the PCC's asset register • Evaluation of the assumptions made by management for those assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value • Consider what assets have been impaired and the basis for the impairment and the amount.

Other risks identified (continued)

Other material balances and transactions

Under International Standards on Auditing, "irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure". All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the risks identified in the previous section but will include:

- Investments (long term and short term)
- Cash and cash equivalents
- Borrowing and other liabilities (long term and short term)
- Usable and unusable reserves
- Movement in Reserves Statement and associated notes
- Statement of cash flows and associated notes
- Financing and investment income and expenditure
- Taxation and non-specific grants
- Segmental reporting note
- Officers' remuneration note
- Leases note
- Related party transactions note
- Capital expenditure and capital financing note
- Financial instruments note
- Police Pension Fund Account and related notes

Other audit responsibilities

- We will undertake work to satisfy ourselves that disclosures made in the Annual Governance Statements are in line with CIPFA / SOLACE guidance and consistent with our knowledge of the Police and Crime Commissioner and Chief Constable.
- We will read the Narrative Statements and check that they are consistent with the statements on which we give an opinion and disclosures are in line with the requirements of the CIPFA Code of Practice.
- We will carry out work on consolidation schedules for the Whole of Government Accounts process in accordance with NAO instructions to auditors.
- We will give electors the opportunity to raise questions about the accounts and consider and decide upon objections received in relation to the accounts

Group audit scope and risk assessment

ISA 600 requires that as Group auditors we obtain sufficient appropriate audit evidence regarding the financial information of the components and the consolidation process to express an opinion on whether the group financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework.

For accounting purposes, the Chief Constable is considered a subsidiary of the PCC and the Chief Constable's financial results are consolidated into the PCC group accounts. We will comply with the requirements of ISA 600 in carrying out our audit of the Chief Constable's financial statements.

Component	Significant?	Level of response required under ISA 600	Planned audit approach
Police and Crime Commissioner (parent)	Yes	Comprehensive	Full scope statutory audit performed by Grant Thornton UK LLP
Chief Constable (subsidiary)	Yes	Comprehensive	Full scope statutory audit performed by Grant Thornton UK LLP

Value for Money

Background

The Code requires us to consider whether the Police and Crime Commissioner and Chief Constable have each put in place proper arrangements for securing economy, efficiency and effectiveness in their use of resources. These are known as the Value for Money (VfM) conclusions. We issue separate conclusions for the Police and Crime Commissioner and for the Chief Constable.

The NAO issued its guidance for auditors on value for money work in November 2015. The guidance states that for local government bodies, auditors are required to give a conclusion on whether the Police and Crime Commissioner and the Chief Constable have each put proper arrangements in place.

The NAO guidance identifies one single criterion for auditors to evaluate:

In all significant respects, the audited body takes properly informed decisions and deploys resources to achieve planned and sustainable outcomes for taxpayers and local people.

This is supported by three sub-criteria as set out in the table.

Sub-criteria	Detail
Informed decision making	<ul style="list-style-type: none"> • Acting in the public interest, through demonstrating and applying the principles and values of good governance • Understanding and using appropriate cost and performance information to support informed decision making and performance management • Reliable and timely financial reporting that supports the delivery of strategic priorities • Managing risks effectively and maintaining a sound system of internal control
Sustainable resource deployment	<ul style="list-style-type: none"> • Planning finances effectively to support the sustainable delivery of strategic priorities and maintain statutory functions • Managing assets effectively to support the delivery of strategic priorities • Planning, organising and developing the workforce effectively to deliver strategic priorities.
Working with partners and other third parties	<ul style="list-style-type: none"> • Working with third parties effectively to deliver strategic priorities • Commissioning services effectively to support the delivery of strategic priorities • Procuring supplies and services effectively to support the delivery of strategic priorities.

Value for Money (continued)

Risk assessment

We shall carry out an initial risk assessment based on the NAO's guidance. In our initial risk assessment, we will consider :

- our cumulative knowledge of both the Police and Crime Commissioner and the Chief Constable, including work performed in previous years in respect of the VfM conclusions and the opinions on the financial statements.
- the findings of other inspectorates and review agencies, including Her Majesty's Inspectorate of Constabulary (HMIC).
- any illustrative significant risks identified and communicated by the NAO in its Supporting Information.
- any other evidence which we consider necessary to conclude on your arrangements.

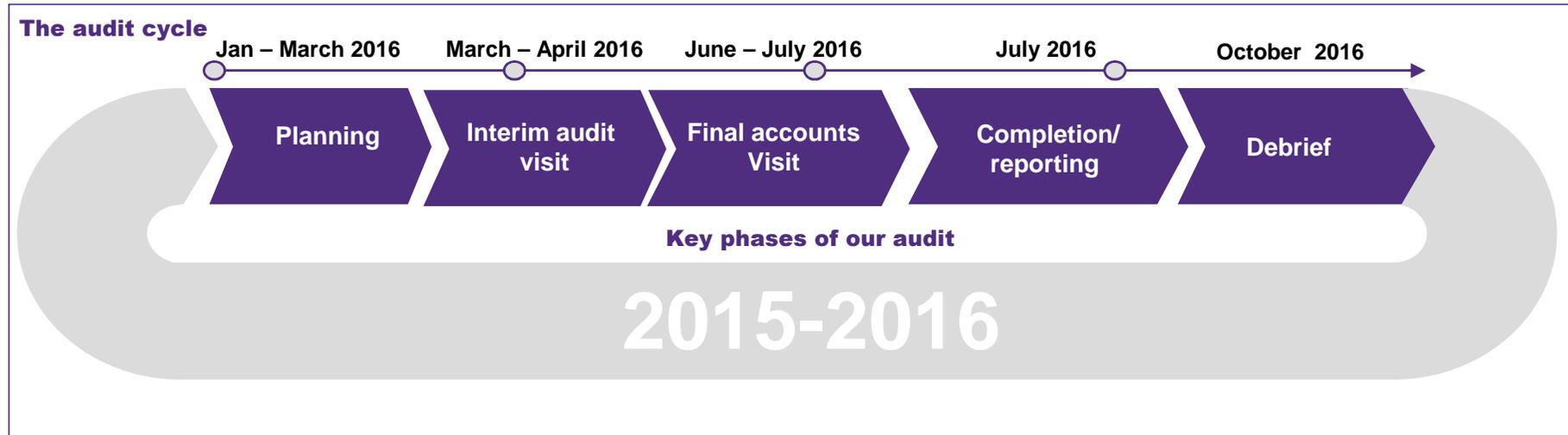
Following the completion of these risk assessments, we will issue a separate joint planning document setting out our planned work for 2015/16 to meet our duties in respect of the VfM conclusion for the Police and Crime Commissioner and the Chief Constable. This will include any significant risks identified, along with details of the work we plan to carry out to address these risks.

Reporting

The results of our VfM audit work and the key messages arising will be reported in our joint Audit Findings Report and in the Annual Audit Letter.

We will include our conclusion as part of our report on your financial statements. This report will be present to the Police and Crime Commissioner and the Chief Constable when they attend the Joint Audit and Standards Committee on 28 July 2016.

Key dates



Date	Activity
On-going	Planning
March to April 2016	Interim site visit
9 March 2016	Presentation of audit plan to the Joint Audit and Standards Committee
9 March 2016	Presentation of audit plan to the PCC and the Chief Constable
June to July 2016	Year end fieldwork
July 2016	Audit findings clearance meeting with the PCC's and the Chief Constable's Chief Finance Officers
28 July 2016	Report audit findings to the Joint Audit and Standards Committee. The PCC and Chief Constable will be present at this meeting, as those charged with governance, prior to their approval of the accounts.
July 2016	Sign financial statements opinions and issue certificate of closure of the audits.

Fees and independence

Fees

	£
Police and Crime Commissioner audit	30,338
Chief Constable audit	15,000
Total audit fees (excluding VAT)	45,338

Our fee assumptions include:

- Supporting schedules to all figures in the accounts are supplied by the agreed dates and in accordance with the agreed upon information request list.
- The scope of the audit, and the Police and Crime Commissioner, Chief Constable and their activities, have not changed significantly.
- The Police and Crime Commissioner and Chief Constable will make available management and accounting staff to help us locate information and to provide explanations.
- The accounts presented for audit are materially accurate, supporting working papers and evidence agree to the accounts, and all audit queries are resolved promptly.

Fees for other services

Service	Fees £
Non-audit services:	
• Tax Advisory Services	2,500

Fees for other services

Fees for other services reflect those agreed at the time of issuing our Audit Plan. These relate to the provision of a tax helpline at an annual cost of £2,500. Any additional work or changes will be reported in our Audit Findings Report and Annual Audit Letter.

Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Auditing Practices Board's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.

Full details of all fees charged for audit and non-audit services will be included in our Audit Findings Report at the conclusion of the audit.

We confirm that we have implemented policies and procedures to meet the requirements of the Auditing Practices Board's Ethical Standards.

Communication of audit matters with those charged with governance

International Standards on Auditing (UK & Ireland) (ISA) 260, as well as other ISAs, prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table opposite.

This document, The Audit Plan, outlines our audit strategy and plan to deliver the audit, while The Audit Findings Report will be issued prior to approval of the financial statements and will present key issues and other matters arising from the audit, together with an explanation as to how these have been resolved.

We will communicate any adverse or unexpected findings affecting the audit on a timely basis, either informally or via a report to the Police and Crime Commissioner and the Chief Constable.

Respective responsibilities

This plan has been prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by Public Sector Audit Appointments Limited (<http://www.psa.co.uk/appointing-auditors/terms-of-appointment/>)

We have been appointed as the Police and Crime Commissioner's and the Chief Constable's independent external auditors by the Audit Commission, the body responsible for appointing external auditors to local public bodies in England at the time of our appointment. As external auditors, we have a broad remit covering finance and governance matters.

Our annual work programme is set in accordance with the Code of Audit Practice ('the Code') issued by the NAO and includes nationally prescribed and locally determined work (<https://www.nao.org.uk/code-audit-practice/about-code/>). Our work considers the Police and Crime Commissioner's and the Chief Constable's key risks when reaching our conclusions under the Code.

It is the responsibility of the Police and Crime Commissioner and the Chief Constable to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Police and Crime Commissioner and the Chief Constable are fulfilling these responsibilities.

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	✓	
Overview of the planned scope and timing of the audit. Form, timing and expected general content of communications	✓	
Views about the qualitative aspects of the entity's accounting and financial reporting practices, significant matters and issues arising during the audit and written representations that have been sought		✓
Confirmation of independence and objectivity	✓	✓
A statement that we have complied with relevant ethical requirements regarding independence, relationships and other matters which might be thought to bear on independence.	✓	✓
Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged.		
Details of safeguards applied to threats to independence		
Material weaknesses in internal control identified during the audit		✓
Identification or suspicion of fraud involving management and/or others which results in material misstatement of the financial statements		✓
Non compliance with laws and regulations		✓
Expected modifications to the auditor's report, or emphasis of matter		✓
Uncorrected misstatements		✓
Significant matters arising in connection with related parties		✓
Significant matters in relation to going concern		✓
Matters in relation to the Group audit, including scope of work on components, involvement of group auditors in component audits, concerns over quality of component auditors' work, limitations of scope on the group audit, fraud or suspected fraud	✓	✓



© 2016 Grant Thornton UK LLP. All rights reserved.

'Grant Thornton' means Grant Thornton UK LLP, a limited liability partnership.

Grant Thornton is a member firm of Grant Thornton International Ltd (Grant Thornton International). References to 'Grant Thornton' are to the brand under which the Grant Thornton member firms operate and refer to one or more member firms, as the context requires. Grant Thornton International and the member firms are not a worldwide partnership. Services are delivered independently by member firms, which are not responsible for the services or activities of one another. Grant Thornton International does not provide services to clients.

grant-thornton.co.uk



The Annual Audit Letter for the Police and Crime Commissioner for Cumbria and the Chief Constable for Cumbria Constabulary

Year ended 31 March 2015

October 2015

Fiona Blatcher

Associate Director

T 0161 234 6393 or 07880 456196

E fiona.c.blatcher@uk.gt.com

Richard McGahon

Senior Manager

T 0141 223 0889 or 07880 456156

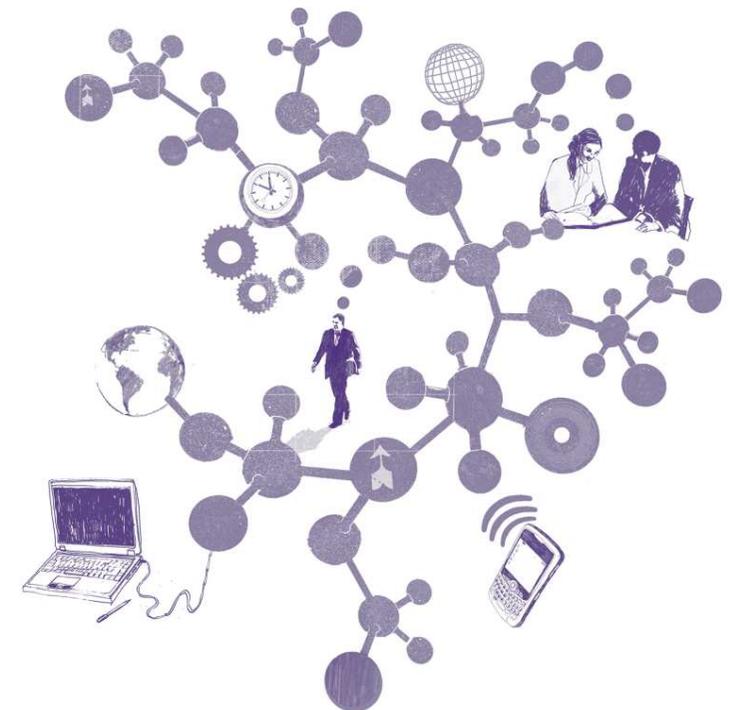
E richard.a.mcgahon@uk.gt.com

Richard Robinson

Assistant Manager

T 0141 223 0888

E richard.robinson@uk.gt.com



Contents

Section	Page
1. Key messages	3
Appendices	
A Summary of reports and audit fees	5

Key messages

Our Annual Audit Letter summarises the key findings arising from the work that we have carried out at the Police and Crime Commissioner (PCC) for Cumbria and the Chief Constable for Cumbria Constabulary for the year ended 31 March 2015.

The Letter is intended to communicate key messages to the PCC, Chief Constable and external stakeholders, including members of the public. Our annual work programme, which includes nationally prescribed and locally determined work, has been undertaken in accordance with the Joint Audit Plan that we issued in February 2015 and was conducted in accordance with the Audit Commission's Code of Audit Practice, International Standards on Auditing (UK and Ireland) and other guidance issued by the Audit Commission and Public Sector Audit Appointments Limited.

Financial statements audit (including audit opinions)	<p>We reported our findings arising from the audit of the financial statements in our Joint Audit Findings Report on 3 September 2015 to the Joint Audit and Standards Committee. which was attended by the Police and Crime Commissioner and the Chief Constable as 'Those Charged with Governance'. The key messages reported were:</p> <ul style="list-style-type: none">• the finance team have made significant presentational changes to the financial statements in 2014/15 by moving technical accounting disclosures into an Annex to the accounts which has improved the readability of the accounts. In our view this has worked well in providing a clearer and easier to read set of accounts• no adjustments affecting the PCC's or Chief Constable's reported financial position• a contingent liability was added to both the PCC and Chief Constable's accounts to reflect the position that future payments will need to be made as the result of a decision by the Pension Ombudsman which affects all police bodies but will be funded by the Government. Additional disclosures have also been made in terms of critical judgements and events after the balance sheet date in relation to this issue• one change was made to the PCC's earmarked reserves note for the treatment of the three years upfront payment towards the pension fund deficit. A small number of other changes were made to the PCC's and Chief Constable's accounts to improve presentation and consistency. <p>Both the PCC and Chief Constable's draft accounts were authorised for issue on 28 May 2015 which was a significant achievement and demonstrates both bodies ability to meet the earlier statutory production of accounts deadline of 31 May which will come into effect for the 2017/18 accounts.</p> <p>We issued an unqualified opinion on the PCC's 2014/15 financial statements on 23 September 2015 and on the Chief Constable's 2014/15 financial statements on 23 September 2015, meeting the deadline set by the Department for Communities and Local Government. Our opinions confirm that the financial statements for each organisation give a true and fair view of the PCC and Chief Constable's financial position and of the income and expenditure recorded by the PCC and Chief Constable, respectively.</p>
--	--

Key messages continued (continued)

<p>Value for Money (VfM) conclusion</p>	<p>We issued unqualified VfM conclusions for the PCC for 2014/15 on 23 September 2015 and for the Chief Constable for 2014/15 on 23 September 2015.</p> <p>On the basis of our work, and having regard to the guidance on the specified criteria published by the Audit Commission, we are satisfied that in all significant respects the PCC and Chief Constable put in place proper arrangements to secure economy, efficiency and effectiveness in their use of resources for the year ending 31 March 2015.</p> <p>The PCC continues to show strong financial resilience and good financial planning and management. Revenue reserves reduced in 2014/15 and although they remain high the medium term financial plan (MTFP) includes plans for future investment, making use of these reserves, to enable the PCC and CC to achieve efficiencies whilst continuing to respond to the police and crime needs of Cumbria. Both the PCC and Constabulary will face significant financial challenges going forward with the current healthy reserves position helping to plan for any further changes. The PCC reported a small overspend of £0.037 million for 2014/15 for the Commissioner's directly managed revenue budget and when the Constabulary underspend is considered the combined group revenue underspend was only £0.221 million. This represents a significant improvement on previous years where large underspends have been the norm. The capital budget for 2014/15 of £13.013 million was underspent by £3.554 million but by 31 July 2015 a substantial amount of the slippage on the capital programme had been spent. The PCC's priorities were updated in March 2015 and confirmed the Commissioner's view that the priorities in the Police and Crime Plan were the right ones. Delivery of the PCC's priorities has included the county CCTV network to be implemented in 2015 and funding to support an Independent Domestic Violence Advocacy and Support Service.</p> <p>The Chief Constable is working closely with the PCC to ensure that its finances are effectively managed. The Constabulary has a good track record of delivering savings plans and its 'Change Strategy' has continued to provide a good basis for its strategic approach to delivering spending reductions. Workforce planning within the Constabulary has improved over the last two years. This has resulted in a more robust workforce plan in place with clear emphasis on getting police officer numbers up to current establishment which has helped ensure staff expenditure is more in line with budget. Despite recent increases in crime, overall crime levels remain relatively low. Increases in the number of reported hate crimes, rape offences and other sexual offences in 2014/15 were expected as a result of the Constabulary encouraging more victims of these serious offences to come forward and report them.</p>
<p>Audit fee</p>	<p>Our fee for 2014/15 for the PCC 's audit was £40,500, excluding VAT which was in line with our planned fee for the year and was the same as the previous year. Our fee for 2014/15 for the Chief Constable's audit was £20,000, excluding VAT which was in line with our planned fee for the year and was the same as the previous year. Further detail is included within appendix A.</p>

Appendix A: Reports issued and fees

We confirm below the fees charged for the audit and non-audit services.

Fees for audit services

	Per Audit plan £	Actual fees £
Police and Crime Commissioner audit	40,500	40,500
Chief Constable audit	20,000	20,000
Total audit fees	60,450	60,450

Fees for other services

Service	Fees £
Audit related services	Nil
Non-audit related services	
• Annual tax helpline	2,500
• assist with the updating of the notice of dispensation for the PCC and Chief Constable	4,000

Reports issued

Report	Date issued
Audit Plan	February 2015
Audit Findings Report	August 2015
Annual Audit Letter	October 2015



© 2015 Grant Thornton UK LLP. All rights reserved.

'Grant Thornton' means Grant Thornton UK LLP, a limited liability partnership.

Grant Thornton is a member firm of Grant Thornton International Ltd (Grant Thornton International). References to 'Grant Thornton' are to the brand under which the Grant Thornton member firms operate and refer to one or more member firms, as the context requires. Grant Thornton International and the member firms are not a worldwide partnership. Services are delivered independently by member firms, which are not responsible for the services or activities of one another. Grant Thornton International does not provide services to clients.

grant-thornton.co.uk



Constabulary Report to OPCC

Agenda Item No 7.1

TITLE OF REPORT: Update to PEEL: Police effectiveness 2015
(Vulnerability)

DATE OF MEETING: 06/04/2016

ORIGINATING OFFICER: Temporary Detective Chief Inspector Neil Cooper

PART 1 or PART 2 PAPER: PART 1 (OPEN)

Executive Summary:

This report will focus on Cumbria Constabulary's improvements and progress in response to the 2015 HMIC PEEL: Police effectiveness 2015 (vulnerability) inspection report.

Recommendation:

- Outstanding actions to be incorporated into the Big 6 plan
- To continue to identify areas of improvement in dealing with vulnerability
- To maintain strong partnerships with other agencies and service providers
- Vulnerability must remain as a priority for the force
- All improvements should be reality tested to ensure they have been embedded fully and are working effectively.

MAIN SECTION

1. Introduction and Background

Cumbria Constabulary was inspected by Her Majesties Inspectorate of Constabularies in 2015 focusing on 4 key areas of vulnerability:

- How well does the force identify those who are vulnerable and assess their level of risk and need?
- How well does the force respond to vulnerable victims?
- How well does the subsequent police action and work with partners keep victims safe?
- How well does the force respond to and safeguard specific vulnerable groups (missing and absent children & victims of domestic abuse) and how well prepared is it to tackle child sexual exploitation?

The overall assessment of how effective the force is at protecting from harm those who are vulnerable, and supporting victims is that the force **requires improvement**.

Cumbria Constabularies progress in dealing with Vulnerability.

Since the inspection there have been a number of changes as to how the force deals with vulnerability which will be broken down into the 4 key areas above.

1. How well does the force identify those who are vulnerable and assess their level of risk and need?

Although the HMIC were satisfied that control room staff deal with callers well and were able to identify vulnerability well, the constabulary has sought to maintain and improve the standard of assessing vulnerability by giving face to face training to all control room staff by experienced PPU staff. This was completed at the beginning of March 2016. This training included training on the National Decision Model.

The HMIC raised concerns about the Constabularies understanding and response to Child Sexual Exploitation and Missing From Home. Since this inspection the constabulary has made numerous improvements in this area of business:

- A multi agency oversight group has been set up to review all cases of concern around CSE and MFH. This is a monthly meeting.
- A multi agency tracker has been devised that tracks the risk to each individual child deemed to be vulnerable to, or a victim of, CSE. This tracker also identifies the vulnerabilities, suspects, type of abuse and other factors in order to assist in identifying themes, commonality, geographical hotspots and emerging trends.
- Further resources have been put into the safeguarding hub dedicated to CSE and MFH. This is now part of a multi agency CSE/MFH pod that is within the Safeguarding Hub.
- All MFH return home interviews are now reviewed and all intelligence is harvested and put on to Sleuth.

- Further internal communications have been sent highlighting the need for CSE intelligence under the Op Chaperone banner.
- A Child Sexual Exploitation non nominal Sleuth profile has been created to store all Op Chaperone intelligence that is not linked to a particular nominal.
- Missing from home guidance has been added to the police mobile devices as a point of reference for all officers.
- Control room staff have been trained in CSE and MFH.

The only area for improvement not yet complete is training for enquiry desk staff on vulnerability. This has been included within the training program for 2016 and will be complete by the end of 2016.

2. How well does the force initially respond to vulnerable victims.

Although the HMIC noted that on the whole, the Constabulary responded well to vulnerable victims, there were a number of issues highlighted that need improvement. At present the force has improved in a number of ways to respond better to vulnerable victims:

- Provided training to Control room staff.
- Update to the force Domestic Abuse policy.
- Circulation of guidance for domestic abuse.
- A CPD will be delivered in May 2016 to all PCSOs and CSE champions, on CSE. A CSE e-learning package was delivered to all staff to raise awareness and assist officers in spotting the signs of CSE. This has been completed by over 75% of officers. A further training package is being written to include vulnerability. This will be face to face delivery to all front line staff by the end of June 2016.

There are plans in place to address all areas that needed improvement although the DVPN/DVPO improvements still need to be completed as does the frontline training but both areas will be complete by August 2016.

3. How well does the subsequent police action and work with partners keep victims safe?

The HMIC noted a number of areas where the Constabulary works to a high standard, such as the high regard partners have for the work done by the PPU's, the fact that crimes involving vulnerable people were allocated to the staff with the right skill set and that the crimes were investigated to a good standard. They also highlighted that the investigations were well supervised and the constabulary was good at keeping victims updated and informed.

There was also comment that the MARAC meetings were well managed and attended. The then imminent opening of the Bridgeway was also highlighted as a positive step forward.

The inspection noted some areas that needed attention and improvement. The response to those areas are below:

- There has been an increase in staffing within the Safeguarding hub as well as a restructure of how the hub works. As a result the backlog referred to by HMIC has been cleared and information is now processed and shared in a timely manner.
- The new staff have had training from supervisors and specific training appropriate to their role.
- The increased staffing has meant that all crime allegations coming into the hub can be recorded there. This has been tested through dip sampling and the force have been found to be 100% compliant with NCRS.
- The DVDS scheme continues to be managed through the hub as per the national guidance and the decisions are made within the timescales defined by the national policy. If for a safeguarding reason of imminent risk, there is a facility to expedite an application.
- A PVP forum meets monthly to ensure all departments have the knowledge of the most vulnerable members of the community. Each person identified is given an action owner to ensure measures are put in place to address their vulnerability. This is also the case for perpetrators to ensure measures are put in place to prevent offending.

All areas for improvement have been addressed.

4. How well does the force respond to and safeguard specific vulnerable groups (missing and absent children & victims of domestic abuse) and how well prepared is it to tackle child sexual exploitation?

The force has worked hard to ensure that it is able to respond to missing children in an effective manner. The inspection noted that there was a need for improvement which has happened since that time. The changes to how the force deals with MFH are:

- The Oversight group chaired by the police is now established and provides a forum to ensure those who go missing that are most at risk and supported by relevant agencies to address the vulnerabilities and the reason for their missing episodes.
- The additional resources in the safeguarding hub are dedicated to CSE and MFH. They ensure all intelligence from the safe and well checks and return home interviews are populated on to the Sleuth intelligence system.
- The multi agency CSE/MFH pod within the safeguarding hub improves the ability of the police to scrutinise the effective delivery of return home interviews in order to ensure all children are being seen and spoken to.
- All “Against CSE Champions” and PCSOs will be delivered CSE training by the force lead in May 2016. This will be complimented by presentations by NSPCC and Children Services.
- 75% of the force has now completed the online CSE training.

- A resource library has been set up which will provide officers with a reference point in order to inform victims and other vulnerable people of services on offer to provide support. This has been highlighted to Control Room staff and will be further highlighted to frontline staff during the delivery of the training on DASH and vulnerability.
- The training department have incorporated the reiteration of the use of victim personal statements into a number of training packages such as ICIDP, MSICDP, probationer training and will include this within vulnerability training.

All the areas for improvement have been addressed or there are plans in place to address them. The training is yet to be delivered but will be complete by August 2016.

The only issues that require longer term remedies are regarding the ability to collect data. These changes can not be made until the new IT system, Red Sigma, goes live. However, these are purely about assessing performance rather than safeguarding the victim.

Summary.

The force has made good progress in addressing the issues raised in dealing with vulnerability. There is no doubt the force is now in a better position to identify vulnerability, respond to vulnerability and refer people to ensure long term support is made available.

The outstanding actions will all be complete by August 2016, except for the changes to the IT systems which will take longer.

2. Issues for Consideration

2.1. Drivers for Change

- HMIC report

2.1. Consultation processes conducted or which needs to be conducted

- Safeguarding hub stock check
- PPU SMT

2.2. Impact assessments and implications on services delivered

- The implications are an improvement of services.

2.3. Timescales for decision required

- All actions to be complete by August 2016

2.4. Internal or external communications required

- Internal communications will be circulated as required for delivery of the actions.

3. Financial Implications and Comments

Budget implications – one off and/or on-going costs, savings, growth, capital and revenue.

None

4. Legal Implications and Comments

Including advice received.

None

5. Risk Implications

Including any mitigating actions that can be taken.

There is a risk that if sufficient progress is not made in respect of the inspection report then the areas for improvement identified will not be sufficiently addressed.

6. HR / Equality Implications and Comments

Including any actions arising from Equality Assessment.

None

7. ICT Implications and Comments

None

8. Procurement Implications and Comments

None

9. Supplementary Information

9.1. List any relevant documents and attach to report

Such as Business Cases, Equality Assessments, PIDs, Media Strategy.

List persons consulted during the preparation of report

- T/DI Brian Murray
- T/Det Supt Thundercloud



Constabulary Report to OPCC

Agenda Item No 7.2

TITLE OF REPORT: HMIC Firearms Licensing Inspection

ORIGINATING OFFICER: Chief Inspector Terry Bathgate
Uniform Operational Support

PART 1 or PART 2 PAPER: PART 1

Executive Summary:

No more than 100 words.

- This paper provides an update on the progress on the recommendations contained in the HMIC report relating to Firearms Licensing, which was published in September 2015.

Recommendation:

Set out clearly the recommendation to be approved, using bullet points and ensure references are included to previous decisions on this matter. Any alternative options considered should not be outlined here but in the 'introduction and background' section.

- That the OPCC notes the progress against the HMIC recommendations.

MAIN SECTION

1. Introduction and Background

Alternative options considered, evaluation, benefits – anything not covered in sections below etc.

- 1.1 In July 2013, the Home Secretary gave approval for HMIC to undertake a scoping exercise, to examine how well police forces had responded to concerns raised about firearms licensing in previous reports published by HMIC, the Independent Police Complaints Commission and the House of Commons Home Affairs Committee.
- 1.2 This work indicated that many of the concerns raised in these reports had not been satisfactorily addressed and that this had the potential to present a risk to public safety.
- 1.3 As a result, an in-depth inspection of the way in which forces undertake this important work was included in the 2014/15 HMIC inspection programme.
- 1.4 The final report published in September 2015 contained 18 recommendations in total. Of these, 9 related to work to be carried out by Chief Constables.
- 1.5 Significant progress has been made in respect of many of the findings. Of the 9 recommendations relating to Chief Constables, 7 are assessed as being completed.
- 1.6 Recommendation 9 and 13 have recently been completed and are rated Green on the assessment. Some of the work relating to these two recommendations is outlined below:
- 1.7 Recommendation 9 states that *'within three months, all chief constables should ensure that their arrangements in respect of the use of temporary permits are in accordance with the Home Office guidance; that temporary permits are properly recorded without delay on the National Firearms Licensing Management System; and that effective systems exist to ensure certificate holders are not permitted, at any time, to remain in unlawful possession of a firearm'*.
- 1.8 Laptops have now been supplied to Enquiry Officers; the training on their use took place on the 21st March and they have now been operationally deployed. This allows staff to update NFLMS immediately when temporary permits are issued. The status of this recommendation has therefore been upgraded to Green - 'completed'.
- 1.9 Recommendation 13. This stated that *'within three months, all chief constables should ensure that systems designed to identify, prior to police attendance, whether a reported incident involves or is at the address of a firearm certificate holder are in place and are always applied by staff dispatching officers to incidents; and that officers understand the risk assessment which they should be undertaking in such circumstances, and their power, when appropriate, to seize firearms and firearm certificates.'*
- 1.10 Guidance has been issued to staff to carry out live time NFLMS checks for Firearms when attending incidents. A review of 100 domestic abuse incidents has taken place to check on compliance with the recommendation. This audit generated a 93% pass rate. The status of this recommendation has therefore been upgraded to Green - 'completed'.
- 1.11 The remaining two recommendations (2 and 4) are assessed as Amber status – 'work started and on track'.
- 1.12 Recommendation 2 states *'within six months, all chief constables should establish arrangements for the effective monitoring and audit of their firearms licensing procedures, as required by the Authorised Professional Practice'*.

RESTRICTED

- 1.13 Agreement has been reached with North Yorkshire Police to carry out this audit work. This will begin in September 2016. The reason for the delay is to allow an internal business change process within the Firearms Licensing team to be embedded. This is linked to recommendation 4.
- 1.14 Recommendation 4 states that *'within three months, all chief constables should review the demand placed on their firearms licensing department to ensure it has the capacity to meet this demand and provide an efficient and effective service at all times'*.
- 1.15 Agency staff have now commenced employment to bring the current backlog down to zero. Further to this, a business change paper was discussed at FSDB on 21st March 2016. This paper examined the options for change within the Firearms Licensing Department to address this recommendation; all of the recommendations within the paper were agreed at this board. This will be a two stage process. The first stage is a back office review and explores the existing make-up of the team and how it could be restructured to provide a timely response to service users. The second stage looks at how to improve efficiency through digitisation, process evaluation and the implementation of e-Commerce. Stage 2 options will be subject to further FSDB papers based on the steer given from this Executive Board.

2. Financial Implications and Comments

Budget implications – one off and/or on-going costs, savings, growth, capital and revenue.

None.

3. Legal Implications and Comments

Including advice received.

None.

4. Risk Implications

Including any mitigating actions that can be taken.

There is a risk that if sufficient progress is not made in respect of the inspection report then the areas for improvement identified will not be sufficiently addressed.

There is a risk that resources will be utilised elsewhere in the organisation, thereby delaying the process/digitisation work.

5. HR / Equality Implications and Comments

Including any actions arising from Equality Assessment.

None.

6. ICT Implications and Comments

None.

7. Procurement Implications and Comments

None.

8. Supplementary Information

8.1 List any relevant documents and attach to report

Such as Business Cases, Equality Assessments, PIDs, Media Strategy.



Constabulary Report to OPCC

Agenda Item No 7.3

TITLE OF REPORT: HMIC Custody Inspection
Final Update

DATE OF MEETING: 6 April 2015

ORIGINATING OFFICER: Chief Inspector Gordon Rutherford Head of Criminal Justice

PART 1 or PART 2 PAPER: PART 1 (Open)

Executive Summary:

No more than 100 words.

- This paper provides a final update on the progress in relation to the HMIC and HM Inspectorate of Prisons unannounced inspection visit to police custody suites which took place between 8-12 June 2015.

The action plan was submitted to the HMIC on December 29 2015. A re-inspection will be unannounced and will take place sometime between April and July 2016 i.e within 12 months from the original inspection.

Of the original 36 recommendations made during the inspection, 3 are incomplete. The remaining outstanding actions are:

- 7.1 Provision of management data for custody – expected to be in place for mid-April 2016.
- 7.3 Provision of local authority safe accommodation for juveniles – expected to be in place by April 2016.
- 7.5 Police Custody not to be used as a place of safety assessment under the Mental Health Act 1983 – subject to Mental Health Trust triage bid and wider concordat work. Exact date not known.

Recommendation:

Set out clearly the recommendation to be approved, using bullet points and ensure references are included to previous decisions on this matter. Any alternative options considered should not be outlined here but in the 'introduction and background' section.

- That the OPCC notes the position in respect of the action plan and future updates that will be received by the OPCC. This will ensure the excellent work completed over the last 12 months is maintained and further improved.

MAIN SECTION

1. Introduction and Background

Alternative options considered, evaluation, benefits – anything not covered in sections below etc.

- 1.1 The HMIC and Inspectorate of Prisons inspected the Constabulary custody facilities over the period 8-12 June 2015.

The areas the inspection focused on were:

- Strategy
- Treatment and Conditions
- Individual Rights
- Healthcare

The full report was published on 29 September 2015. The updated action plan was submitted to the HMIC on 29 December 2015. The HMIC will make an unannounced re-visit to inspect the Constabulary within 12 months of the original inspection.

Significant progress has been made in respect many of the findings. However it is recognised that some of the principle findings in terms of police cells not being used as a place of safety for Mental Health Act detentions is still dependant on external partner provision.

A concordat task and finish group led by the CCG has been reinvigorated by the appointment of a dedicated mental health commissioner.

This is split into 2 separate work streams:

1. A bid for extra support for telephone triage based at the Carleton Clinic Carlisle. This bid was approved by the Police and Crime Commissioner at the beginning of March 2016. A plan is now in place to recruit and train staff.
2. A bid to the Home Office Innovation Fund for a 136 assessment centre located in the North of the County; supported by a triage car provided by the ambulance service, has been approved. The next steps to implement this are being considered by the Mental Health Partnership Trust.

The Constabulary is actively supporting this work at strategic and tactical levels.

Across the county the average 136 detentions is between 20-25 per month. Of these detentions, only 1 or 2 on average are detained at a police station. This enables each one to be reviewed on a case by case basis. The findings are that the use of police cells is generally appropriate given other aggravating factors, e.g. violence.

In addition, recommendation 7.3, the review of the provision of accommodation for young persons has been done. Each overnight detention of any juvenile is reviewed individually by the police and issues are escalated as appropriate to Children's Services. Oversight of juvenile detentions is provided by the Safeguarding Improvement Board.

This has resulted in a greater strategic connection between the Constabulary and Children's Services; the actual provision of beds for overnight detentions is expected

to be resolved by the end of April 2016; when a proposal to have one bed in the north of the county and one bed in the south of the county will be implemented. This action is with Children's Services to implement.

As the majority of the actions are complete on the action plan, it is suggested that for future meetings a more generalist 'Custody Update' paper is presented that could focus on key performance issues from the custody dashboard, which can be agreed in negotiation with the OPCC. This paper could also provide progress updates in respect of the two strategic issues above.

2. Financial Implications and Comments

Budget implications – one off and/or on-going costs, savings, growth, capital and revenue.

None.

3. Legal Implications and Comments

Including advice received.

None.

4. Risk Implications

Including any mitigating actions that can be taken.

There is a risk that if sufficient progress is not made in respect of the inspection report then the areas for improvement identified will not be sufficiently addressed.

5. HR / Equality Implications and Comments

Including any actions arising from Equality Assessment.

None.

6. ICT Implications and Comments

None.

7. Procurement Implications and Comments

None.

8. Supplementary Information

8.1 List any relevant documents and attach to report

Such as Business Cases, Equality Assessments, PIDs, Media Strategy.

HMIC action plan which has been reviewed and given RAG ratings in respect of work to date.

8.2 List persons consulted during the preparation of report

Representatives from:

- Cumbria HMCTS
- Criminal Justice Mental Health Steering Group
- Cumbria Mental Health Partnership Trust
- G4S Medical Service

RESTRICTED

Item 7.3 - HMIC CUSTODY Update March 2016 (2)

- Cumbria County Council Children's Services
- Youth Offending Service
- NHS England
- The Appropriate Adult Service LTD
- Head of Procurement Cumbria Constabulary



Constabulary Report to OPCC

Agenda Item No 7.4

TITLE OF REPORT: Vulnerable Localities Index (VLI)

DATE OF MEETING: 06 April 2016

ORIGINATING OFFICER: Superintendent Rob O'Connor

PART 1 or PART 2 PAPER: PART 1 (OPEN)

Executive Summary:

- This paper sets out the approach taken by the Constabulary in utilising the Vulnerable Localities Index (VLI) which is a popular analytical method used by police agencies in England and Wales to identify residential neighbourhoods that should be prioritised for attention.

Recommendation:

- That the Police and Crime Commissioner notes the current position and work being undertaken on the Ormsgill estate in Barrow, and Mirehouse estate in Whitehaven.

MAIN SECTION

1. Introduction and Background

1.1 Introduction

The Vulnerable Localities Index (VLI) is a popular analytical method used by police agencies in England and Wales to identify residential neighbourhoods that should be prioritised for attention. The VLI uses data on crime, deprivation and socio-demography to form a single composite index value for small geographic areas, which when mapped can assist in determining where to target neighborhood policing and crime prevention initiatives.

Its use has also helped to prompt other public sector partners such as local government agencies to recognise the collaborative role that they could play with the police in helping to address mutual issues of public safety. These findings suggest that in the spirit of partnership working, potential opportunities exist in achieving mutually beneficial gains in improving public safety through the collaboration of fire, police and other local public service delivery.

VLI was developed by the University of Central London with the Jill Dando Institute in response to the riots in early 2000. It uses six data sets and a formula to identify a score. The data sets used are in relation to counts of burglary dwelling, counts of criminal damage to a dwelling, income deprivation, employment deprivation score, count of 15 – 24 year olds and educational attainment.

1.2 Cumbria VLI scores

The VLI scores were calculated for each Super Output Area (SOA) in Cumbria. Due to the relatively low population density, they were aggregated into ward level figures. However, the dataset showed how many SOAs within the total had VLI outputs higher than 200, which is the recognised figure that indicates the area which needs targeted partnership intervention.

Within each of the six districts of Cumbria, this data was used to highlight which wards are evidencing a need for targeted work at ward level.

This figure was then assessed in line with the SARA problem solving model. Local knowledge about the demographics and other aggravating features was then included in the overall assessment before a recommendation was given.

The rationale used by IMS for the moderating factors was as follows:

- Data had been aggregated to ward level to compensate for low numbers and low criminality in rural Cumbria.
- A decision had been taken to target residential areas rather than town centre /shops/non-residential areas.
- In addition to the VLI scores, other datasets were reviewed and assessed against the same ward based parameters.

- From the data gathered, wards were chosen to reflect a broadly similar overall number of VLI / IOM subjects / victims / ASB incidents / Crimes / Focus Families. The combined total of all incidents is approximately 1000, spread over one or more wards.
- These choices were then discussed with NPT officers to advise which would be most suitable for some place based targeted intervention. In effect, this was a 'health check' to confirm the VLI and supporting data was targeting the right areas.

1.3 Links to Focus Families work programme

The selected wards were shared with the Focus Families team to identify any collaborative opportunities to target some households who are the subject of the Focus Families work.

1.4 Proposed target areas, with totals of all incidents:

Copeland

Mirehouse	VLI of 271 with 4 IOM subjects
Sandwith	VLI of 207 with 0 IOM subjects
Cleator Moor South	VLI of 201 with 1 IOM subject
Cleator Moor North	VLI of 178 with 1 IOM subject

Barrow Borough

Barrow Island	VLI of 384 with 6 IOM subjects
Ormsgill	VLI of 414 with 10 IOM subjects

1.5 Target areas chosen

As per the comments in 1.2 above, any SOA that had a VLI output of higher than 200 should be considered for targeted intervention work. Given the scores generated, IOM offenders within the SOA and ongoing Focus Families work, it was decided that the two areas to be targeted would be the Ormsgill estate in Barrow, and Mirehouse estate in Whitehaven.

1.6 An example of the work on Ormsgill Estate

Work commenced in late January 2016, with a dedicated PC and two PCSOs being deployed to the project.

A strategic group was formed which included the Chief Executive of Barrow Borough Council, the local Police Superintendent, the County Councillor for Ormsgill Ward, the Housing Manager of Barrow Borough Council, the Public Health Locality Manager, a member from the Clinical Commissioning Group and the Head of Partnerships and Commissioning from the OPCC.

This strategic group provides the governance for the project, and set the aims and objectives and considers funding requests.

A tactical group has also been formed which includes the dedicated PC and PCSOs, a Police Inspector, and representatives from Women's Community Matters, Youth Workers, Head Teachers from the local schools, health workers, The Well project and residents to name a few.

The targeted intervention work is already paying dividends, with sound working relationships being developed on the Ormsgill estate.

A mini 'Streetsafe' took place, with over 100 residents completing questionnaires with regards to the main crime and disorder issues on the estate. The main problems identified were drug misuse, speeding vehicles and dog fouling.

A suggested approach is 'weed and seed' where robust enforcement work takes place in relation to the 'weed' element, and then the 'seeds' are sown for the community to develop and ensure sustainability.

With a view to addressing the issues from the mini Streetsafe, as part of the 'weed' element on Ormsgill a number of addresses were targeted recently as part of Operation Quadrant. This saw a number of search warrants executed, with drugs being recovered and persons charged and remanded in custody. A number of vehicles were then targeted by the DVLA, and several vehicles were clamped. The Mobile Support Group are now targeting speeding motorists, and Barrow Borough Council and the PCSOs are targeting the dog fouling.

This is very much in the ethos of 'you said, we did', and the residents of the estate can see that the problems they identified are now being targeted. This was followed up with positive local media coverage, with reporters being invited along on some of the search warrants.

1.7 Brathay Trust involvement

For a number of years the Brathay Trust at Ambleside have worked successfully with Merseyside Police as part of a Police and Youth Encouragement Scheme (PAYES).

PAYES is a youth and community initiative aimed at young people who are at risk of becoming involved in criminal activity. PAYES targets young people aged 12 or 13 who have not come to the adverse attention of the Police, but are deemed to be on the cusp of criminality. Risk factors include the presence of young offenders amongst their peers, regular truanting from school, and / or sharing a home with a known offender.

A number of meetings have been held between the Constabulary and the Brathay Trust, and a programme has been developed for 20 young people from Ormsgill and 20 young people from Mirehouse to take part in what will be the Cumbria Youth Encouragement Scheme (CYES).

At present the young people are being identified through the Prevent and Deter panels, Focus Families and other youth engagement work. Once these young persons eligibility has been confirmed, they will be interviewed at home and invited to sign a contract committing them to good conduct, a proviso of remaining involved in the scheme.

This is a three year programme, and the Brathay Trust have secured funding for one cohort, with the OPCC funding the second cohort.

1.8 Involvement of Safer Cumbria

Attached at Appendix A is a proof of concept paper from Paul Bradley at Safer Cumbria.

The paper sets out some suggested aims and objectives and key outcomes and deliverables, with key performance indicators for partner agencies.

1.9 Funding

The OPCC has provided £100,000 worth of funding, with that being split between Ormsgill and Mirehouse. The OPCC has also provided £6,000 of funding for the CYES programme with the Brathay Trust.

A further £15,000 has been provided by Public Health for the Ormsgill project.

1.10 Progress to date

There has been significant progress made over the last two months in both Ormsgill and Mirehouse.

A Copeland Hub is proposed at Whitehaven Police Station which will bring together a number of partner agencies to tackle community problems, focusing on VLI.

A number of partner agencies have engaged, and although it is still early days it is clear that the benefits are already being seen, and a number of diversionary projects are being organised for young people during the school holidays, and of an evening time.

The feedback received from the public of the Ormsgill estate, and the County Councillor who lives on the estate, is that this approach is already making a difference.

2. Issues for Consideration

2.1 Drivers for Change

Links to Police & Crime Plan and priorities; legal requirement; efficiency requirement; improvement.

- This is a pilot project being developed in both South and West Cumbria, and dependent upon its success VLI may be used in other parts of the County. There is a desire to drive down Police demand, and by targeted interventions and adopting a multi-agency approach, VLI may assist.

2.2 Consultation processes conducted or which needs to be conducted

- None required

2.3 Impact assessments and implications on services delivered

- None required

2.4 Timescales for decision required

- None required, for noting only

2.5 Internal or external communications required

- None required

3. Financial Implications and Comments

Budget implications – one off and/or on-going costs, savings, growth, capital and revenue.

3.1 None identified

4. Legal Implications and Comments

Including advice received.

4.1 None identified

5. Risk Implications

Including any mitigating actions that can be taken.

5.1 None identified

6. HR / Equality Implications and Comments

Including any actions arising from Equality Assessment.

6.1 None identified

7. ICT Implications and Comments

- 7.1 The provision of a Copeland hub at Whitehaven Police Station will require investment, but it is planned for this to come from the £100,000 OPCC funding.

8. Procurement Implications and Comments

- 8.1 None identified

9. Supplementary Information

- 9.1 List any relevant documents and attach to report

Such as Business Cases, Equality Assessments, PIDs, Media Strategy.

- VLI proof of concept paper prepared by Paul Bradley, Safer Cumbria

- 9.2 List persons consulted during the preparation of report

- ACC Martland
- Superintendent Slater



Office of the Police & Crime Commissioner Report

Title: Office of Public Engagement Update

Date: 6 April 2016

Agenda Item No: 08

Originating Officer: Engagement and Communications Officer

CC:

Executive Summary:

In accordance with the Police Reform and Social Responsibility Act 2011 the Police and Crime Commissioner has a responsibility for providing policing services and representing the communities within Cumbria. Engagement with members of the public and listening to what they have to say is an important part of the Commissioner's work, and the feedback received helps inform the Police and Crime Plan, influences strategic decisions and ultimately aims to improve the quality of service that members of the public receive from the Constabulary.

In order to ensure that the Commissioner's public engagement activity, including public complaints and quality of service issues, is managed and feedback is captured and acted upon, the Office of Public Engagement (OPE) was set up in March 2013. The ethos of the OPE is 'We asked' – 'You said' – 'We did'. The aim of this paper is to provide the Executive Board with an overview of the activity of the OPE to 1 March 2016, in order to illustrate how this has helped to shape the overall policing strategy going forward.

Recommendation:

That, the Police & Crime Commissioner notes the progress within the OPE so far this year.

1. Introduction & Background

- 1.1 As explained above, this report provides a summary of the activity carried out by the OPE during this year to date, and helps to illustrate how the Commissioner has responded to the feedback received from the community.

- 1.2 The report is broken down into two sections:
- A summary of 'Quality of Service' issues and public complaints received by the Office of the Police and Crime Commissioner, and subsequent recommendations and actions;
 - A summary of engagement activity and events, feedback and subsequent action.

2. Issues for Consideration

2.1 Quality of Service Issues (QSPI) & Public Complaints

- 2.2 Members of the public contact the Commissioner regarding a wide variety of issues relating to policing, some of which are not classified as public complaints and are treated as QSPIs. They also advise the Commissioner personally when attending surgeries or engagement events. By receiving such communications it provides the OPCC and the Commissioner with a good source of information on what members of the public are experiencing and what matters to them in their local communities.
- 2.3 The correspondence received is assessed and the most appropriate way to deal with the matter is then progressed. Where necessary the OPCC will contact the Chief Constable's Office to ascertain further information in order to inform the Commissioner's response to the individual.
- 2.4 As the role of the Commissioner has become more widely understood and publicised, the number of issues which are brought to his attention has increased. Appended to the report is a breakdown of the quality of service issues which have been received by the OPCC from 1 January to 31 December 2015 and from 1 January to 29 February 2016 (Appendix 1). Detailed within the charts is a breakdown of the nature of the issue, the area in which the incidents occurred and the months in which issues are reported.
- 2.5 As can be seen from Appendix 1 the nature of the issues raised during 2015, with the exception of the spike in February in relation to hunting and again in October in relation to CCTV, fall into three main categories: the police response, the police service (either provided or received) and police resources. As can be seen from the issues raised during the first two months of 2016 a similar trend is occurring.
- 2.6 On a case-by-case basis, information which is collated from quality of service issues is used to help improve services provided by both the OPCC and the Constabulary, and to improve learning.

Public Complaints

- 2.7 These issues are reiterated in the types of complaints which the OPCC receives which include complaints relating to police officers and staff. As public awareness of the PCC role has increased and people understand the Commissioner's remit in relation to complaints, the number of complaints which are wrongly sent to the OPCC has decreased.

- 2.8 Appendix 2 illustrates the number of complaints received by the OPCC regarding policing during 2014, 2015 and 2016 (to 29 February 2016). These mirror those matters which are raised in relation to the quality of service issues – police conduct, police response and police service.
- 2.9 This data should be read in conjunction with the Constabulary’s public complaint figures as reported to the Ethics & Integrity Panel meeting on 12 February 2016 and is attached at Appendix 3.
- 2.10 With regard to public complaints the largest percentage increase in the current 12 month period was in West TPA for Breaches of PACE seeing an increase of 9 complaint allegations (60%); and South TPA for incivility with an increase of 4 allegations (21%). The group that saw the largest percentage increase in the current 12 month period when compared to the previous 12 months was Direction & Control increase of 28 complaint allegations (112%) this is across the areas, partly due to more appropriate use and partly to the agreement regarding complaints about the control room.
- 2.11 All other groups showed an overall reduction. In particular Unprofessional Conduct and Oppressive Behaviour, traditionally main groups and both saw reductions of over 25%. Unprofessional Conduct reduced by 72 allegations (28.6%) and Oppressive behaviour by 29 allegations (25.9%).
- 2.12 The Ethics and Integrity Panel monitor public complaints received and processed by the Constabulary on a six monthly basis. As part of this monitoring process they undertake a dip sample of finalised complaint files and are able to comment or provide an independent perspective on each case they sample. On a case-by-case basis the Panel will discuss any identified issues and use these to improve future handling of complaints. Such issues are highlighted within the Panel’s report to the Executive Board on a quarterly basis.
- 2.13 A record of issues identified by the Panel is provided to the Head of the Professional Standards Department to ensure that any issues or recommendations are acted upon. This is then subsequently monitored by the Panel .
- 2.14 The Panel also receives a quarterly report on the Constabulary’s performance in relation to complaints. The report presented in February 2016 showed that with regard to the types of allegations made during the period up to the end of December 2015 the largest increases were seen in the following:
- West TPA – Breaches of PACE increase of 9 complaint allegations (60%).
 - South TPA - Incivility increase of 4 allegations (21%)

2.15 Public Engagement Activities and Events

- 2.16 During this period, the Commissioner and the OPE have undertaken a wide range of public engagement activities. We have continued to seek opportunities for the Commissioner to interact with as many people as possible, and a few examples are highlighted below:
- We have held county-wide surgery style events such as ‘drop-ins’ at supermarket cafés, community centres, village/church halls, leisure centres etc., including Maryport, Silloth, Arnside, Longtown, Brampton and Penrith;
 - Also held public surgeries in Appleby, Cockermouth, Barrow, Dalton-in-Furness, Kendal, Sedbergh, Egremont and Windermere. Among the issues raised was speeding vehicles, CCTV, neighbourhood disputes, visibility of police officers;
 - Following each surgery, the feedback is used meet to inform discussions between the Commissioner and the Chief Constable, and where appropriate, the Commissioner will highlight particular issues;
 - The Commissioner has attended a range of community meetings, parish councils, meetings with various groups including representatives from business, youth and those with disabilities. The Commissioner has sponsored another Know Your Criminal Justice day in Barrow, aimed at helping those with learning disabilities understand what to expect if they need to report a crime, with particular emphasis on hate-crime. These have been very well received, with delegates saying that they now feel more confident about what to expect if they were a victim or witness of hate crime, and would be more inclined to report it now;
 - The Commissioner has attended the Cumberland Show, Westmorland Show and Cumbria Pride events;
 - In terms of consultation events, the OPCC commissioned a large scale, independent and statistically significant consultation on what the people of Cumbria would be prepared to pay by way of the police precept. As a result of this, the Commissioner was better able to set the police precept for financial year 2015/2016, confident that it had public support;
 - The Commissioner also part funds and makes use of Cumbria Community Messaging, which is managed by the Cumbria Neighbourhood Watch Association (CNWA), and offers people and communities across Cumbria the means to receive information from agencies in the county tailored to their particular preferences for content, priority and means of communication. It is a web based system and registration is quick, simple and completely free;
 - There are some 7000+ subscribers at present. The Commissioner also uses this as one of the mediums for his regular newsletters;
 - The Commissioner has also attended a wide range of media launches for initiatives funded through the OPCC’s Property Fund, Community Fund and Innovation Fund. The funds are aimed at supporting initiatives and projects that help tackle the Commissioner’s Police and Crime Plan priorities, and raise the public’s awareness of what can be achieved to deter antisocial behavior, improve safety and reduce offending and reoffending, within the community;
 - Media events include the launch of the new county-wide CCTV system, the new Barrow Police Station Open Day and the opening of Calderwood House, the homeless hostel in Egremont that prioritises veterans;
 - The OPCC has a website which generally received about 1500 hits per month;
 - We also maintain a social media presence, using Twitter and Facebook.

3. Implications

- 3.1 Financial - there are no additional financial costs associated with dealing with these complaints or quality of service issues.
- 3.2 Legal – none identified.
- 3.3 Risk - None identified, beyond that to the OPCC's reputation if it does not deal with the issues raised appropriately and proportionately according to the merits of the individual case.
- 3.4 HR / Equality - none specifically identified.

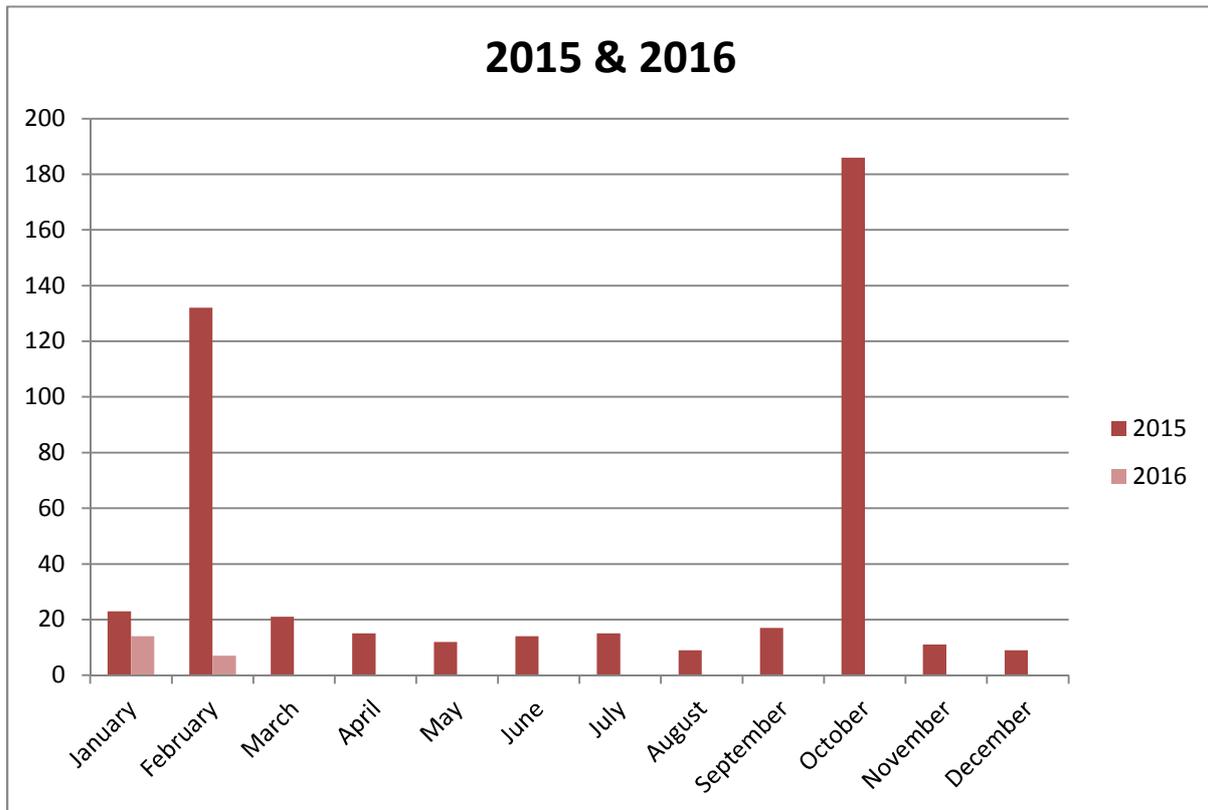
4. Supplementary information

Appendix 1 –Quality of Service issues received by the OPCC

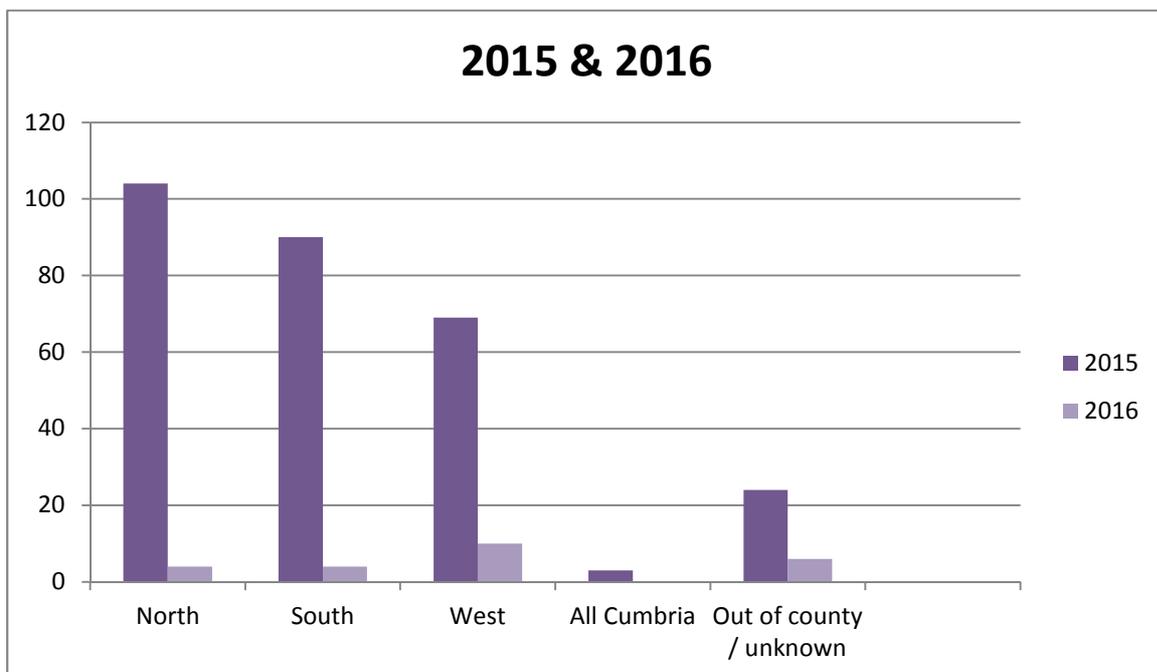
Appendix 2 – Complaints received by the OPCC and Constabulary Public Complaints

Appendix 3 – Ethics and Integrity Panel report

QSPI's per Month

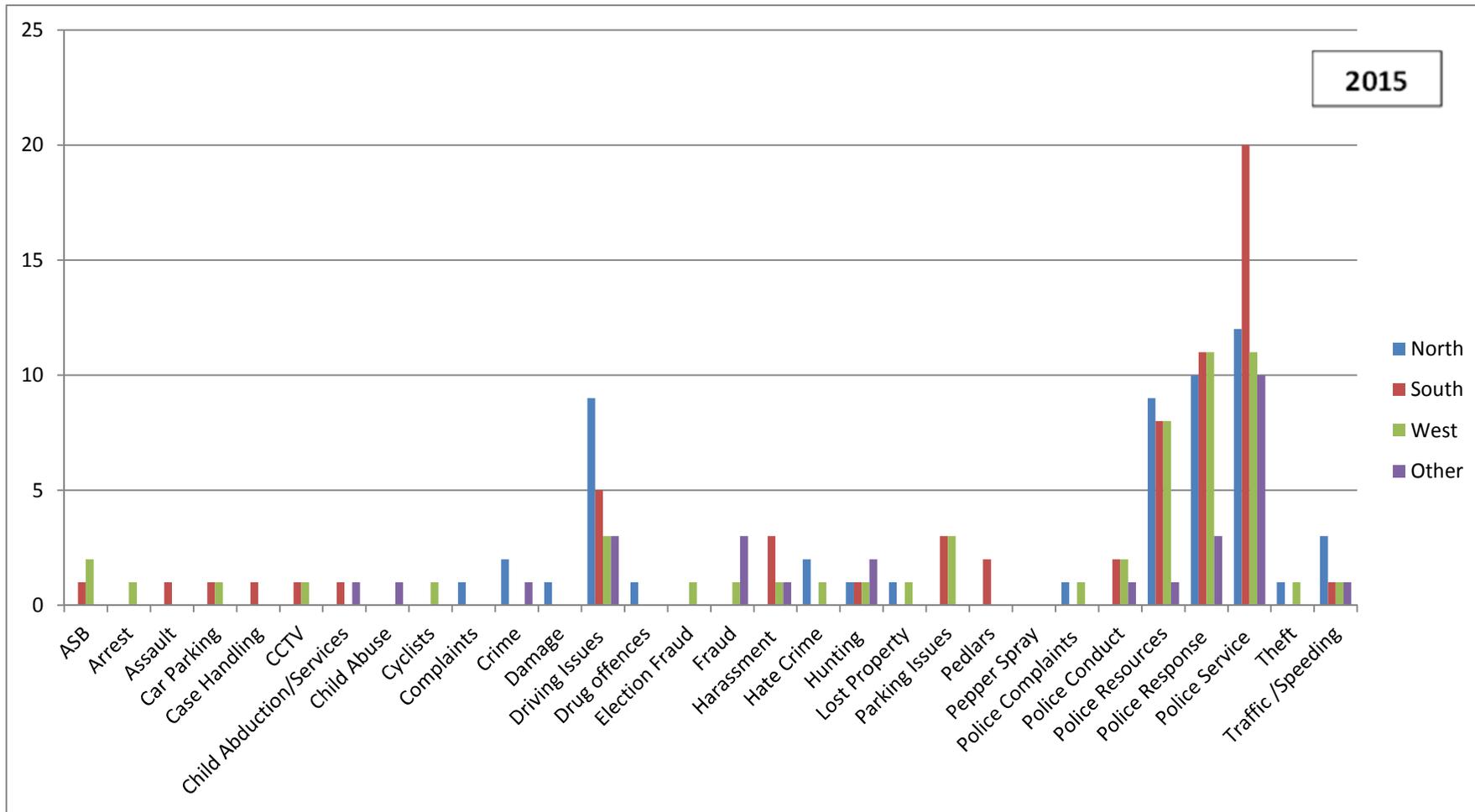


QSPI's per Area

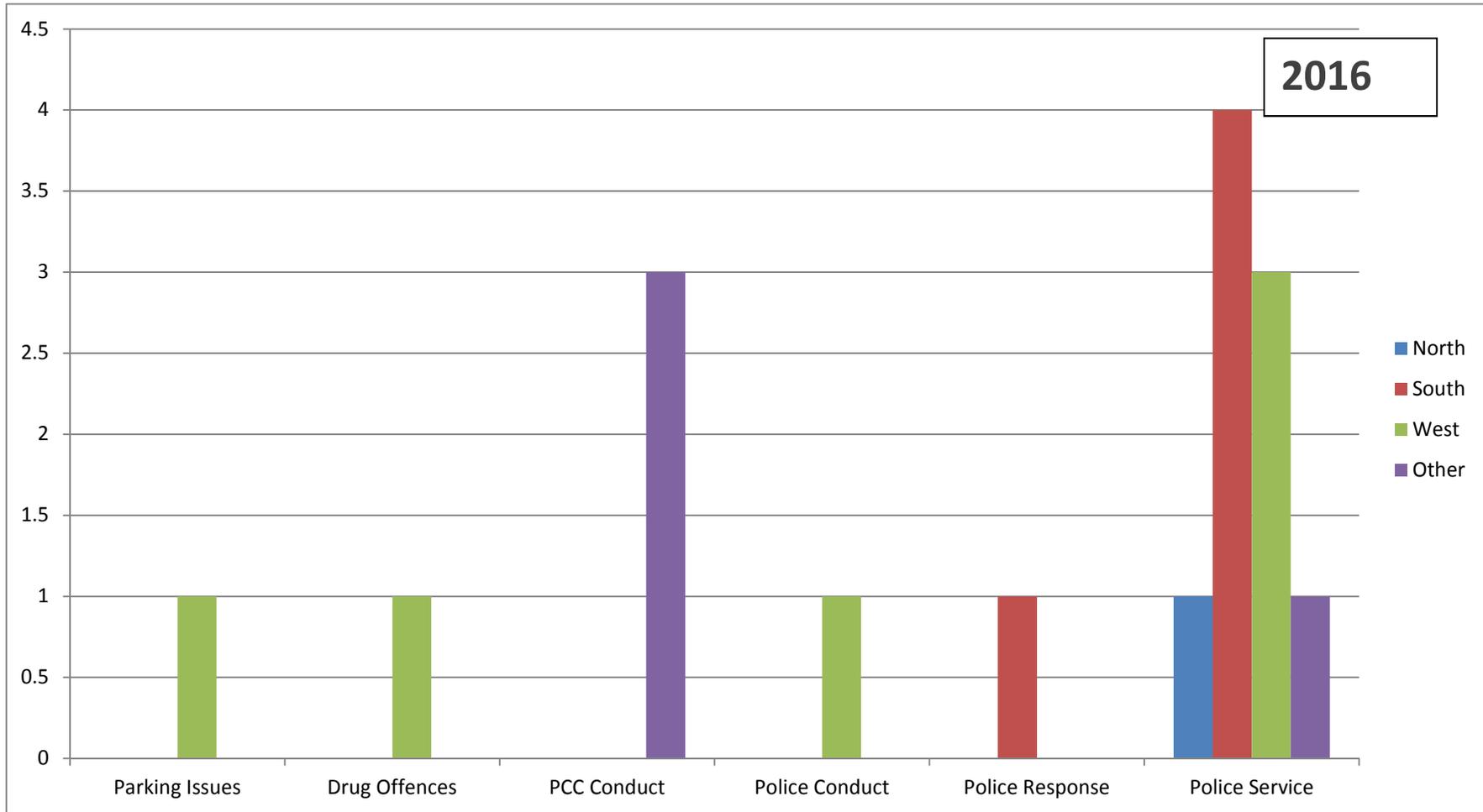


The data above is for 1 January to 31 December 2015 and 1 January to 29 February 2016

QSPI Categories

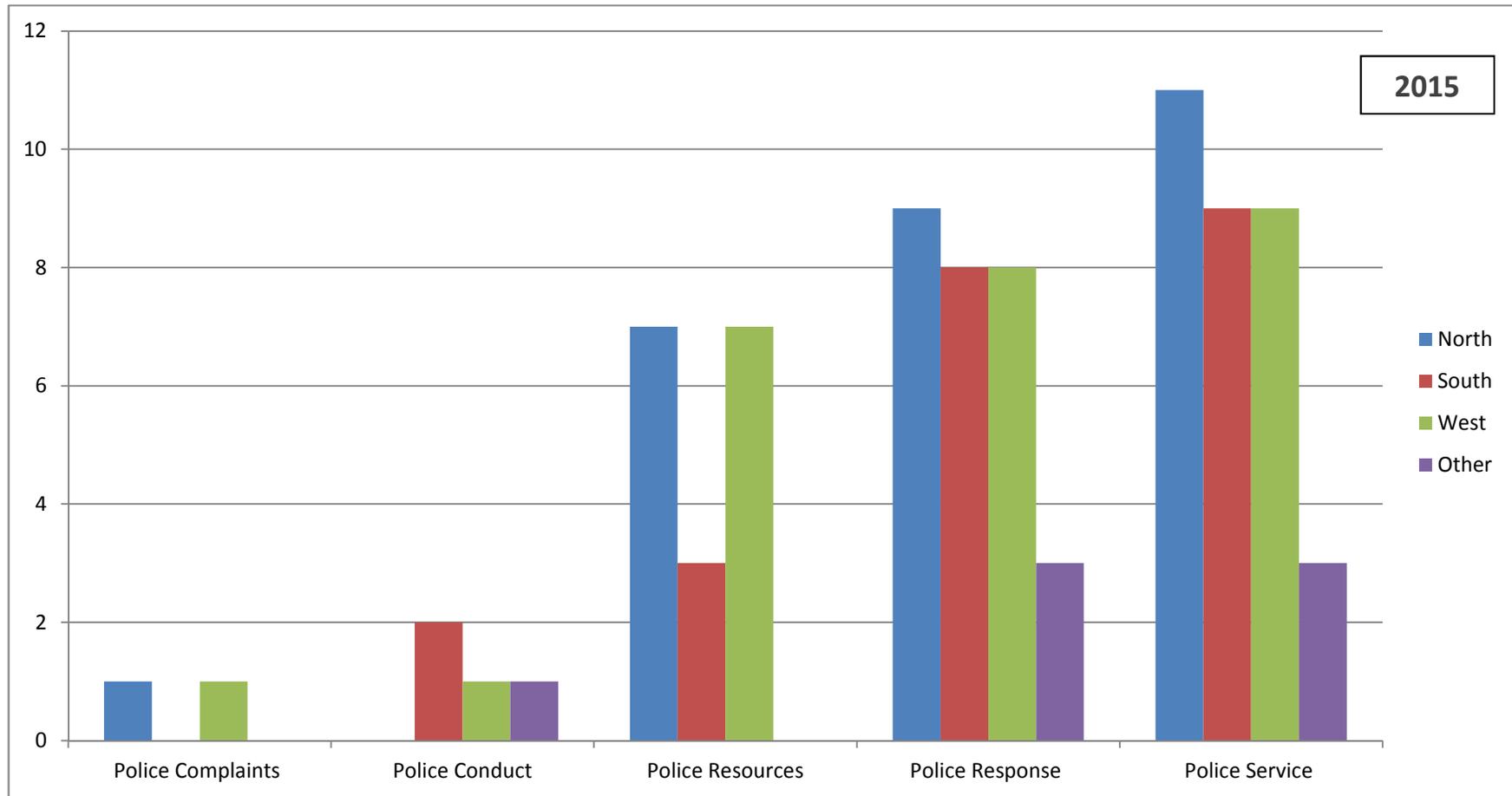


During 2015 the OPCG received 124 letters regarding Hunting and 175 letters regarding CCTV provision within the county. In the above table these have been counted as 1 case each.



The above figures are for the period 1 January 2016 to 29 February 2016.

QSPI Categories – Police Service



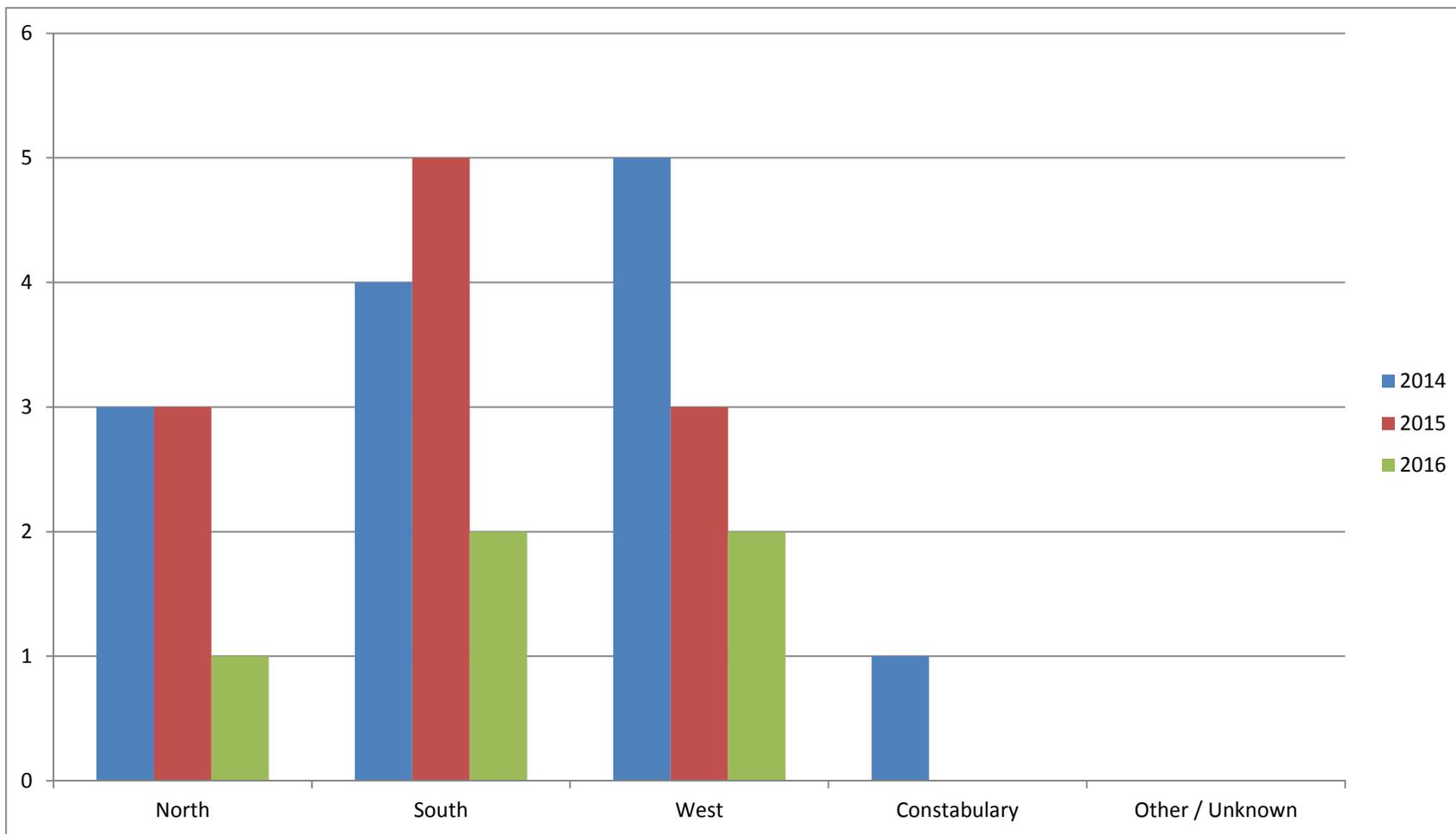
The above categories cover a wide range of areas which members of the public wish to report or are concerned about. Below are some examples:

Police Resources - lack of or reduction in police resources; police officer numbers

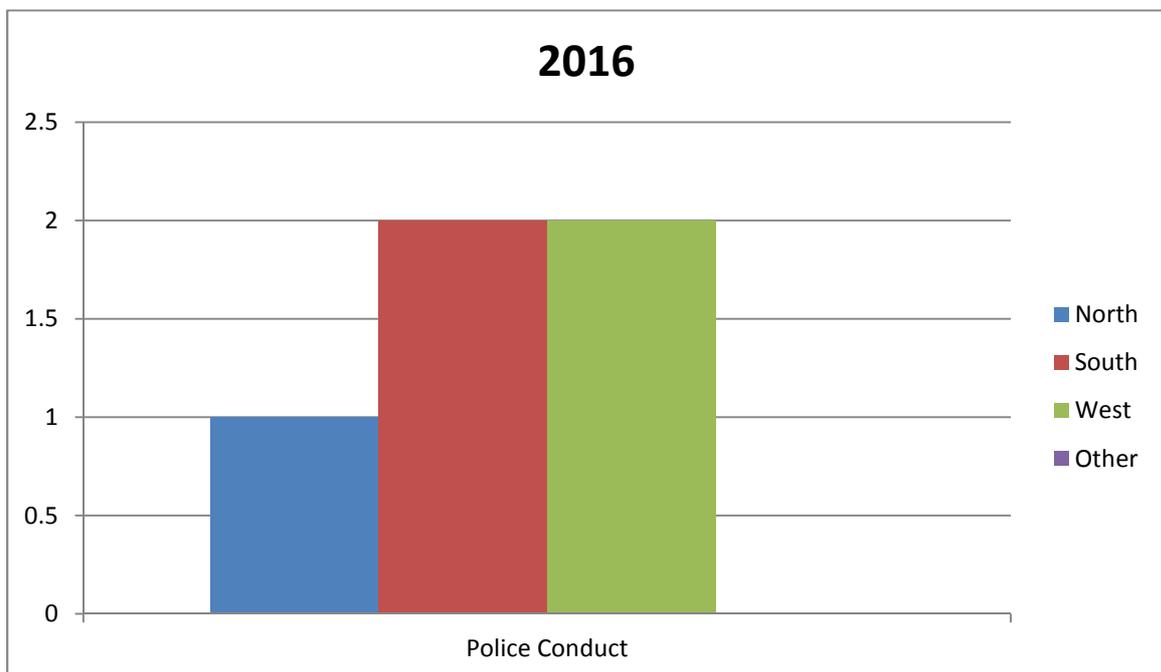
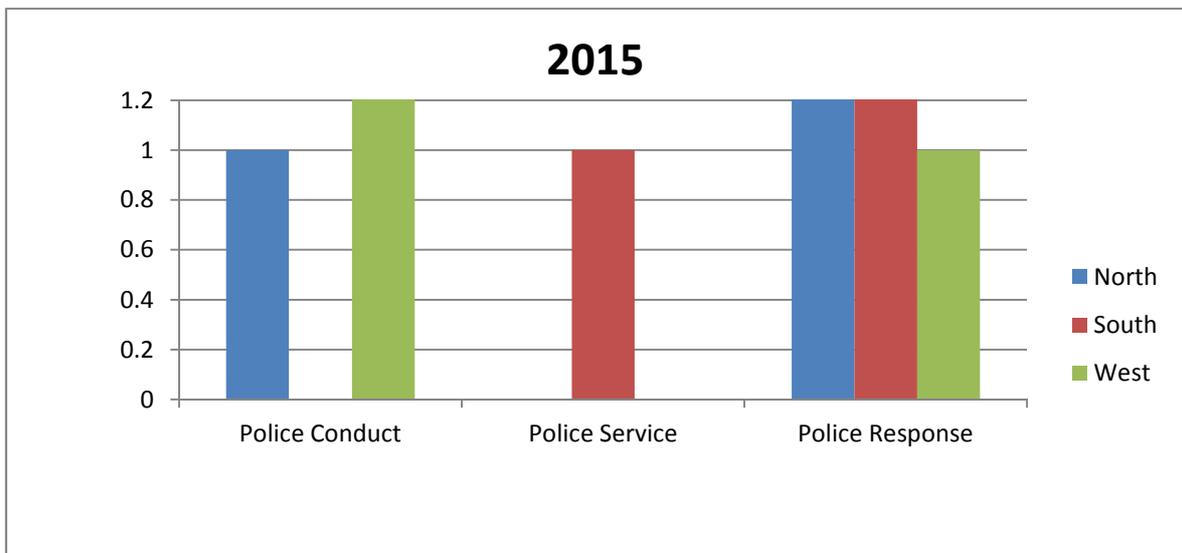
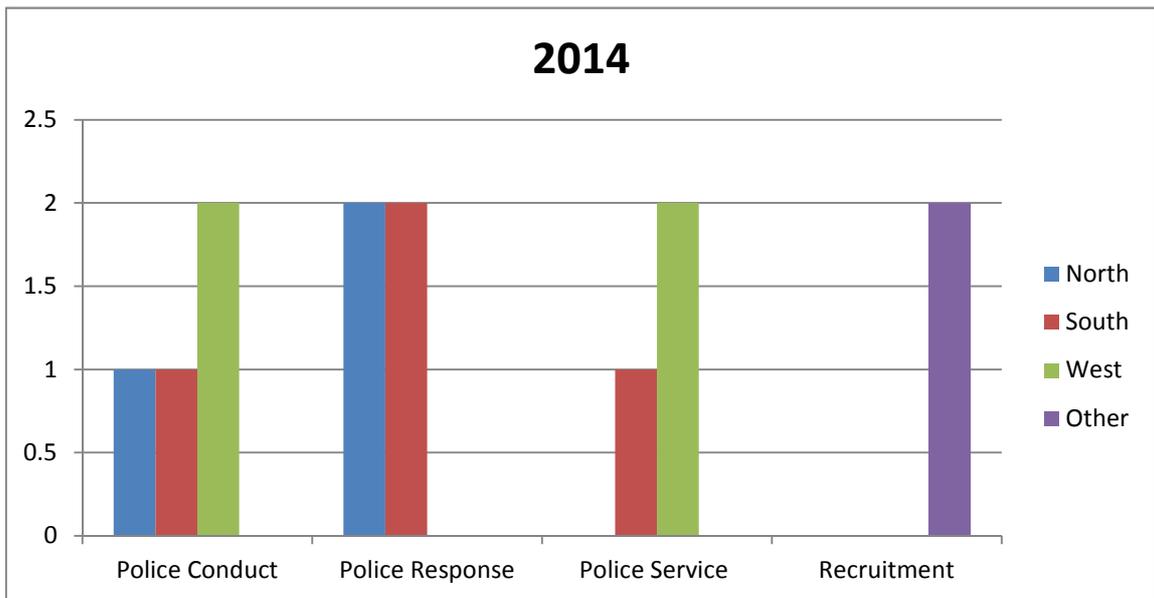
Police Response – dissatisfaction with - response provided (or lack of); officer’s attitude; handling of a case

Police Service – provision of policing services (or lack of); officer attendance; types of policing such as rural crime; policies and procedures.

OPCC Received Complaints - Areas



OPCC Received Complaints – Types



Constabulary – Public Complaints

The table below shows the numbers of allegations and cases (not including Direction and Control) broken down into areas: -

Area	12 Month Rolling to Dec-14 Allegations			12 Month Rolling to Dec-14 Cases		
	12 Month Rolling to Dec-14	12 Month Rolling to Dec-15	Change	12 Month Rolling to Dec-14	12 Month Rolling to Dec-15	Change
North	174	131	-43	94	94	0
South	161	145	-16	95	96	1
West	173	163	-11	102	93	-9
UOS	19	27	8	12	22	10
HQ	27	13	-14	10	11	1
Total	554	479	-76	313	316	3

The table below shows the allegations broken down into area and group: -

12 Month Period	Group	North	South	West	UOS	HQ	Grand Total
12 Month Rolling to Dec-15	Breaches of PACE K,L,M,N,P,R	11	14	24	1		50
	D&C	13	14	12	7	7	53
	Discrimination F	3	4	3			10
	Incivility U	26	23	16	6	1	72
	Malpractice G,H,J	5	6	9	2		22
	Oppressive Behaviour A,B,C,D,E,Y	28	30	21	4		83
	Other W	2	5	1		1	9
	Unprofessional Conduct S,T,V,Q,X	43	49	76	8	4	180
12 Month Rolling to Dec-15 Total		131	145	162	28	13	479
12 Month Rolling to Dec-14	Breaches of PACE K,L,M,N,P,R	24	11	15		3	53
	D&C	8	5	5	2	5	25
	Discrimination F	4	3	5	1	0	13
	Incivility U	24	19	27	4	0	74
	Malpractice G,H,J	8	9	7	1	0	25
	Oppressive Behaviour A,B,C,D,E,Y	44	29	33	3	3	112
	Other W	0	0	0	0	0	0
	Unprofessional Conduct S,T,V,Q,X	62	85	81	8	16	252
12 Month Rolling to Dec-14 Total		174	161	173	19	27	554

The largest increases have been seen in the following: -

- West TPA – Breaches of PACE increase of 9 complaint allegations (60%).
- South TPA - Incivility increase of 4 allegations (21%)



Office of the Police & Crime Commissioner Report

Title: Independent Custody Visiting Scheme and Animal Welfare Scheme – Annual Report

Date: 6 April 2016

Agenda Item No: 09

Originating Officer: Joanne Head, Independent Custody Visiting Scheme Administrator

Executive Summary:

The Police and Crime Commissioner is required by statute to operate an Independent Custody Visiting Scheme (Section 51(1) of the Police Reform Act 2002, as amended) and such a scheme operates within Cumbria. This report covers the activities of the scheme for the operating period from 1 February 2015 – 31 January 2016

Recommendation:

That the Police and Crime Commissioner note's the report.

1. Introduction & Background

- 1.1. The Independent Custody Visiting Scheme is made up of volunteers who live or work in Cumbria. They make unannounced visits to Police Stations to check on the welfare and well-being of people in police custody. There are currently four panels of up to 12 volunteers each across Cumbria, in Barrow, Kendal, North Cumbria and West Cumbria.
- 1.2. In addition to the Independent Custody Visiting Scheme, Cumbria Police and Crime Commissioner also runs an Animal Welfare Scheme, although there is no statutory requirement to do so. A panel, currently made up of nine volunteers drawn from the ranks of the ICV scheme, makes visits to the dog section at Police Headquarters. The same volunteers now also make visits to the Civil Nuclear Constabulary dog section kennels at Sellafield. Although the Animal Welfare visitors for CNC are the same as those for the OPCC scheme, the CNC scheme is operated independently by CNC.

2.0 Supplementary Information

2.1 Scheme Membership

Panel	As at 01 Feb. 2015	As at 31 Jan. 2016
Barrow	11	10
Kendal	11	8
North	12	12
West	8	11

2.2 Recruitment between 01 Feb 2015 and 31 January 2016

Panel	Resignations and retirements	New appointments
Barrow	3 members resigned	1 appointed on 1 June 2015 – recruitment process being undertaken
Kendal	3 members resigned and 3 retired	2 appointments on 7 January 2016 – recruitment process being undertaken
North Cumbria	1 member resigned and 1 retired	
West	3 members resigned	1 new appointment pending

There have been a significant number of changes of personnel on each of the panels during this year and the Scheme Administrator has run a number of recruitment campaigns to attract new candidates for appointment. Induction training courses have been run for newly-appointed visitors in Kendal 9th February, Workington 5th May 2015, Barrow 3rd July, Carlisle 16th October and at Penrith on 5th and 7th January 2016. A campaign to attract new volunteers to the Barrow and Kendal Panels is drawing to a close with shortlisting and interviews taking place during March and April respectively.

2.3 Visits and Statistics

Each panel aims to undertake one unannounced visit every week to each of the four designated police stations, Barrow, Carlisle, Kendal and Workington. These targets were introduced in 2005 following consultation with the Chief Constable. Each panel covers one designated police station and some also visit non-designated police stations whenever the cells at those stations are in use. In addition, the North Cumbria panel makes visits to Penrith Police Station when it is being used under Operation Safeguard, though no visits were required during the period of this report.

Appleby Police Station is visited at least once when the cells there are used during the Appleby Horse Fair. From 7 December 2015, members of the West Cumbria Panel made visits to Whitehaven Police Station, following the flooding experienced in Cumbria. Custody provision was returned to Workington Police Station on 5 February 2016.

From 1 January 2016 Self Introduction was introduced for all custody visitors when conducting their visits within the four custody suits. Custody visitors can now introduced

themselves to each detainee which has shown an increase in the number of detainees who agree to speak with them.

Visits undertaken 1 February 2015 – 31 January 2016*

	No of visits	Detainees in Custody	Detainees seen and spoken to	Detainees observed	Detainees not seen
Barrow	50 out of 53 (51 out of 52)	128 (142)	66 (67)	44 (41)	20 (34)
Kendal	47 out of 52 (48 out of 52)	73 (61)	31 (25)	30 (22)	15 (14)
West (Workington)	41 out of 45 (46 out of 52)	117 (186)	68 (77)	33 (72)	18 (37)
West (Whitehaven)	5 out of 7 (1 out of 1)	7 (0)	6 (0)	0 (0)	1 (0)
Whitehaven custody was designated from 7 December 2015 until 5 February 2016.					
North (Durrhill)	47 out of 52 (48 out of 52)	119 (198)	56 (102)	45 (66)	22 (30)
North (Appleby)	1 out of 1 (1 out of 1)	0 (0)	0 (0)	0 (0)	0 (0)
Totals	191 out of 210 (195 out of 210)	444 (587)	221 (271)	152 (201)	75 (115)

*Figures for the corresponding period 1 February 2014 – 31 January 2015 are given in brackets.

During the reporting period there were 444 detainees held when visits took place, of whom 45 were juveniles. Of the 444 detainees, 221 were visited and interviewed, representing 49.7% of detainees. In addition, 152 detainees who did not wish to be interviewed were observed in their cells or through the cell hatch or seen during booking in, representing a further 34.23% of detainees. 75 detainees (16.89%) were not available to be seen.

There are a number of reasons why visitors may not see detainees: they may be in interview at the time of the visit, may have been admitted to hospital, or it may be that the custody officer has advised the visitors not to visit because the detainee is potentially violent; wherever possible all such detainees are observed through the cell hatch. Whilst the visitors have to be provided with access to all detainees, detainees do not have to consent to be spoken to.

2.4 Issues Raised

No serious issues were raised by any detainee during any of the visits covered by this report. Issues that were raised were largely about personal circumstances, covering such matters as concerns about access to prescription medication, concerns about notification of next of kin and concerns about time of release.

Where issues were raised by detainees, the visitors discussed them with the custody sergeant and there were no cases where the visitors wished to raise any concerns with the Duty Inspector.

There were issues raised by the visitors at a number of visits, largely voicing concern about matters related to the estate. Such issues included the operation of toilets, showers, heat and ventilation, the state of decoration and maintenance etc. All of these issues have been raised with the Constabulary and the Estates Department as appropriate.

There have been a small number of complaints from the visitors about being required to wait in the reception area at the Police station for more than a few minutes on arrival. Subsequent enquiries have shown that these delays have usually been either because Custody has been very busy at the time or because there had been a delay in informing the Custody officer of the arrival of the visitors. Neither of these reasons are acceptable – the visitors are entitled to have immediate access to the Custody suite unless allowing them to enter would place them, or someone already inside the Custody suite in danger. Custody staff and Reception staff have been reminded of the requirement to allow immediate access where this has been necessary.

In general, the visitors are very satisfied with the conduct of visits and often make complimentary remarks in their reports about the custody officers and detention officers they meet. They are keen to stress the professional and caring attitude they almost invariably encounter when observing the way in which detainees are treated.

The Custody Managers (Insp Barr and Insp Lloyd) attend the regular panel meetings in their area whenever possible and their attendance is very much appreciated by the members. In addition, there is very regular liaison between the Custody Managers and the Scheme Administrator and the Scheme Administrator also attends the full meetings of the Custody Forum.

In September 2015 a new custody suite and police station were opened at Barrow in Furness. The Commissioner organized a charity sleepover in the cells overnight on Thursday 3 September when the Chair of the Barrow Panel joined the sleepover. On Friday 4 September all members of the Barrow Panel were able to have a tour of the new custody facilities. An open day was held on Sunday 6 September when members of the public were able to look around the new police station and custody facilities. Members of the Barrow Panel had an information stand within the building and spoken to a number of members of the public about the work carried out by custody visiting volunteers.

2.5 Night Observation Visits

In addition to the regular weekly visits, night observation visits also take place from time to time. These are pre-arranged visits where two ICVs attend the custody suite to observe a night shift at work. This is done in order that they can gain a greater understanding of the work of the custody staff and the processes and procedures used in custody.

Programmes of night observation visits have taken place throughout the County as all newly-appointed ICVs are required to undertake at least one visit before their appointment is confirmed. Normal practice is for each newly-appointed ICV to be accompanied by an experienced colleague from the same panel.

2.6 Cumbria ICV Conference – Sat 25th April 2014

The 2015 Cumbria ICV Annual Conference was held at the Cumbria Rural Enterprise Agency (CREA), at Redhills, Penrith, on Saturday 25th April 2015. 31 Custody Visitors attended the Conference which was organised and managed by the Scheme Administrator, the Governance and Business Services Manager and Mrs Paula Coulter, Executive Support Officer.

Panel	Attendance
Barrow	7
Kendal	10
North	12
West	9

The delegates received presentations by the Police and Crime Commissioner; Insp. David Barr who spoke about changes to custody; and a presentation from G4S regarding Health Care in Custody.

Juliet Gray, Training Officer for Carlisle/Eden MIND, provided an awareness session to assist visitors to recognise signs of potential suicide. The delegates undertook a number of workshop exercises focusing on developing good practice in Custody Visiting and a series of scenario discussions aimed at improving practice in the Cumbria ICV scheme.

2.7 North West and North Wales Regional ICV Conference – Sat 24th October 2015

The North West and North Wales Regional ICV Annual Conference took place on Saturday 24th October 2015 at the conference centre at Haydock Park Racecourse. 24 ICVs and the Scheme Administrator attended the conference with representation from the four panels as follows:

Panel	Attendance
Barrow	5
Kendal	7
North	7
West	5

The programme for the day included:

- An address by the Police and Crime Commissioner for North Wales, Winston Roddick
- Presentations on:
 1. The Bradley Report: Vulnerable People in Custody presented by Lord Bradley
 2. Learning Disabilities and Difficulties in Custody, Keyring Living Support Network
 3. Liaison and Diversion for Mentally Disordered Offenders presented by the NHS
- The delegates also held a series of workshop groups to discuss various scenarios they encounter when making visits to custody and to debate ways of improving the current scheme.

2.8 Animal Welfare Scheme

The number of visitors for the Animal Welfare Scheme increased in 2015 and it currently has 7 appointed visitors with one vacancy giving a total of 8 visitors. This appointment has been delayed until April 2016 following the successful candidate will receive training on behalf of the Dogs Trust in Cumbria.

Monthly visits to the kennels at Carleton Hall and the CNC kennels at Sellafield have continued and to date there have been no issues to report in relation to the health or well-being of the Police Dogs.

2.9 Scheme Handbook

An annual review of the Scheme's Handbook was undertaken in April 2015 ensuring that the information was up to date and that the scheme continued to run effectively.

The new Scheme Handbook covers all aspects of the operation of the scheme in a pocket-sized reference book and incorporates a copy of the Home Office Code of Practice on Independent Custody Visiting together with revised Appointments, Complaints, Appeals and Performance Review procedures.

3 Implications

3.1 Financial

Operation of the Custody Visiting and Animal Welfare Schemes is included within the current budgetary provision of the Office of the Police and Crime Commissioner. There are no direct financial implications as a result of this report

3.2 Legal

The Police and Crime Commissioner is required to operate an Independent Custody Visiting Scheme to comply with the requirements of Section 51(1) of the Police Reform Act 2002 (as amended).

3.3 Risk

There are operational risks associated with the Independent Custody Visiting Scheme. These being that, there are insufficient volunteers available to undertake the required number and/or frequency of visits. This would result in the Police and Crime Commissioner being unable to fulfil his statutory function. The second risk is that the actions or inactions of individual Custody Visitors could compromise the safety of the Custody Visitors whilst carrying out their role and/or result in reputational damage to the Scheme.

4 Supplementary Information

The Cumbria Independent Custody Visiting Scheme Handbook
Home Office Code of Practice on Independent Custody Visiting – March 2013



Office of the Police & Crime Commissioner Report

Title: Ethics & Integrity Panel Quarterly Report

Date: 17 March 2016

Agenda Item No: 10

Originating Officer: Mrs Lesley Horton, Ethics & Integrity Panel Chair

CC:

Executive Summary:

The Police & Crime Commissioner and the Chief Constable both wish to ensure high standards of integrity and ethical working within their respective organizations. In order to achieve that objective and provide openness and accountability to the public they established an Ethics & Integrity Panel. This quarterly report provides an overview of its work since the last meeting on 12 February 2016.

Recommendation:

That the Police and Crime Commissioner take note of the Panel's report.

1. Introduction & Background

- 1.1 The purpose of the Ethics & Integrity Panel is to promote and influence high standards of professional ethics in all aspects of policing and to challenge; encourage and support the Commissioner and the Chief Constable in their work in monitoring and dealing with issues of ethics and integrity in their organizations. The Panel considers questions of ethics and integrity within both organizations and provides strategic advice and support in relation to such issues.
- 1.2 To assist the Commissioner in his task of holding the Chief Constable to account for the policing services that are provided, the Panel has looked at areas of performance, provided advice and acted as a 'critical friend', with the aim of achieving consistency in the process of making decisions. The Panel's role is to identify issues and monitor change where required. The Panel has no decision making powers, although it is able to make recommendations to the Commissioner and the Chief Constable.
- 1.3 The Panel meets on a quarterly basis and an annual work programme has been devised and agreed to enable it to fulfil its terms of reference. The annual work programme fixes the tasks to be undertaken by the Panel at each of its scheduled meetings and has been set to

ensure whenever possible that meetings are balanced in terms of the volume of work. Annual reviews have been included in the programme.

2. Issues Considered by the Panel

The Panel held its quarterly meeting on 12 January 2016. The meeting was also attended by T/Deputy Chief Constable Martland and Chief Inspector Furzana Nazir. The Panel considered the following areas of work:

Panel Membership and Appointment of Chair

The Chief Executive presented a report which outlined that two members of the panel had resigned. These members being Mr Peter McCall following his announcement to run for Police and Crime Commissioner; and Paul Forster following his appointment as a Legally Qualified Chair for Police Misconduct Panels.

In light of these resignations the Office of the Police and Crime Commissioner (OPCC) had revisited the list of candidates interviewed when the Panel was established. As a result, Michael Duff had been offered, and accepted, an appointment on the panel which would be until 30 June 2016.

As Paul Forster had been chair of the Panel it was proposed that the members appoint a chair from within the existing Panel membership. This appointment would be until 30 June 2016. Lesley Horton and Alan Rankin agreed to share the appointment with Lesley undertaking the role for February, March and April. Alan would then take up the appointment of Chair for May and until the end of June. They also agreed that they would both waive the Chair's allowance which was allocated to this position.

Review of the Previous 12 Months

The Panel were keen to receive feedback from the Commissioner on the work they had carried out during the previous 12 months and whether this had fulfilled his expectations of the panel. The Commissioner advised that he was pleased with the work of the panel to date and he felt it remained important to have a panel of independent people looking at a variety of areas of business within the OPCC and the Constabulary.

Chief Inspector Nazir advised that following the work undertaken by the panel a number of areas of business within the Professional Standards Department had changed. This had been as a result of the Panel's views and suggestions on improvement of the service. T/DCC Martland commented that it was important to have an independent panel who could provide openness and transparency to a number of areas of business.

The members then discussed how the future work of the Panel could continue to add value to both organisations. A number of areas were discussed on how the panel could be used for specific issues, these were identified as:

- Misconduct files – no further action and officers being on or off duty
- Secondary business interests
- Ethical issues identified by the Valuing Individuals Group
- Ask the Chief questions which had an ethical content
- Thematic inspections, or following major incidents or events.

The Panel Chair thanked T/DCC Martland, Chief Inspector Nazir and the Commissioner for their suggestions. When considering work to be given the Panel, the Chair asked that the Panel be given the work at the time when they could add most value. In 2015 the panel had been asked to comment on the Professional Discretion Framework, however this had been towards the end of the developmental process and although the Panel were able to provide a viewpoint they felt that had they been involved sooner some of their views may have been included prior to implementation.

A discussion took place regarding recent events in the media regarding the death of a 2 year-old girl. Although the Panel understood that they would not be provided with any information at this stage they felt that could play a role in the future. The Commissioner advised the Panel on his current position, what he was and was not allowed to do or say in relation to the matter. The Panel felt that although information could not be given to the public at the present time, positive messages that things were happening would provide confidence in the work of the Constabulary and in the Commissioner.

Integrity – Complaints by the Public

The T/Deputy Chief Constable presented a report which detailed public complaints that the Constabulary had received during the reporting period along with comparison figures for the previous 12 months rolling period. Generally the number of complaints being received was reducing with a reduction of 75 allegations being identified in the last quarter.

The Professional Standards Department and Human Resources would on a monthly basis look at officers who were repeatedly receiving complaints to identify if there were any trends or issues and decide upon the best course of action. A member asked how it was possible to distinguish between officers who stood out or had a frontline role with those who were actually committing the offences. Chief Inspector Nazir advised that they would look at this in a broader context rather than the allegations/complaints alone. This would include speaking to fellow officers and looking to see if there was any CCTV evidence.

The number of allegations relating to discriminatory behaviour had reduced during the 12 month period with 10 allegations being received.

In Cumbria the majority of complaints were dealt with by way of Local Resolution; generally within 39 days which compared favourably against other similar forces and the national average.

It was noted that the number of Force Appeals had reduced whilst the number of IPCC Appeals upheld had increased. A member questioned whether the outcome of an appeal

varied from that of the original investigation. Chief Inspector Nazir assured the members that on many occasions it did. The complaint would be reviewed by a Superintendent from either Crime Command or a Territorial Policing Area (TPA) who were independent from the original investigation. It was proposed that this should be an area which the Panel could look at during their next scheduled dip sample session.

Integrity – Anti-Fraud and Corruption

The T/Deputy Chief Constable presented the quarterly report on work undertaken by the Constabulary's Anti-Corruption Unit. He guided members through the report, commenting on each of the cases listed that had been finalised and those still ongoing providing an update on their current status. Of the reports received the number categorised as 'vulnerability' had seen an increase and had been broken down into concerns regarding behaviour and financial.

A member questioned the resignation of officers during the misconduct process. The T/Deputy Chief Constable advised that these officers had been student officers who under Regulation 13 could be dismissed or resign from their position even when misconduct procedures were being undertaken against them.

The members were pleased to note that the number of officers who were currently suspended had reduced from 11 in the previous year to now only 2.

Chief Inspector Nazir provided members with examples of the types of issues and incidents which were currently ongoing in relation to this area of work.

Grievances

The T/Deputy Chief Constable presented a report which outlined the number of grievances currently being dealt with by the Constabulary in comparison to the previous 12 months and 3 year periods. He advised that since the report had been published a further grievance had been recorded bringing the total to date up to two.

He advised that culturally in Cumbria officers and staff voiced their concerns and generally matters were dealt with informally. Although this may be good for the individuals involved it did not allow the matters to be recorded and to enable the organisation to learn for the future or make appropriate changes. A member asked whether groups such as line manager forums existed to enable such information and any issues, trends or concerns to be shared with others across the organisation. Chief Inspector Nazir advised that Superintendents had at least quarterly meetings with Inspectors during which they would discuss such issues. The Panel Chair stated it was important that such issues were documented to ensure the health of the organisation and its awareness of the issues concerning officers and staff. The T/Deputy Chief Constable agreed upon the importance of capturing such information and would look to progress this.

Transparency Compliance

(a) Office of the Police & Crime Commissioner

The Governance and Business Services Manager presented a report which outlined to the panel areas of business which could potentially be subject to fraudulent behaviour. The report outlined the work undertaken by the OPCC to ensure transparency and that audit checks were undertaken to ensure that fraudulent behaviour did not take place. Members were advised that an Internal Audit review undertaken in 2015 on these areas of work had not identified any risks or shortcomings in the OPCC's procedures and processes.

Members were advised that the purpose of the report was to provide assurance that systems and processes were in place. The members, thanked her for the report but felt that although the report provided assurance, as they had not sampled any areas of the work they were themselves unable to endorse any assurance. Following discussion it was agreed that as this area of work was monitored and audited that future reports would not be required and that the Panel should only become involved, as appropriate, should an incident occur.

(b) Cumbria Constabulary

Cumbria Constabulary also provided a report outlining the same areas of business which could again be subject to fraudulent behaviour. As with the OPCC, the report provided an outline of the work carried out by the Constabulary, ensuring transparency and prevention of fraud or corruption.

Following on from discussions held earlier in the meeting, it was proposed that the panel undertake to dip sample the Constabulary's Secondary Business Interests. This was with a view to ensuring consistency in approval or denial and how any ethical dilemmas were dealt with.

It was also agreed that future reports would not be required unless an incident should occur.

Professional Discretion Framework

The T/Deputy Chief Constable provided the Panel with a verbal update on the implementation of the Professional Discretion Framework within the Constabulary in September 2015. The framework gave officers discretion not to investigate or attend incidents. This was to allow the Constabulary to rationalise the work that they carried out with reducing resources.

He talked the Panel through some examples of the 56 incidents when the framework had been used. He reassured the panel that when considering not attending or investigating an incident thorough background checks and intelligence were also being considered as part of the decision making process. Each decision was signed off by a supervising officer who had the ability to overturn the decision should they feel it necessary.

Should a business or organisation continually suffer or be targeted by individuals committing the same offences then this would be considered and appropriate action taken at the time or preventative advice given. This could include the local PCSO visiting the organisation and continuing to monitor the situation.

The T/Deputy Chief Constable advised that a full review would be undertaken once the framework had been used for 6 months, this being the end of March 2016. It was agreed that an update would be provided to the next Panel meeting in May and that the Panel would review 6 cases.

Thematic Dip Sample – Stop and Search

In 2015 Her Majesty's Inspectors of Constabulary (HMIC) had carried out a thematic inspection on the Constabulary's use of Stop and Search Powers. Following this review HMIC had made a number of recommendations to the Constabulary. During the morning the Panel had undertaken a dip sample of a number of stop and search forms with a view to assessing whether the information contained within the form provided enough evidence to substantiate the grounds for the stop and search.

The Panel advised that having looked at the sample they had only found 1 or 2 which they felt fully explained the reason for the stop and search. The remainder had given very little information and the Panel felt members of the public could question the legitimacy and lawfulness of the stop. They had asked whether the poor quality could be attributed to certain officers, but were advised that it was in fact across the board.

The Panel were informed that since the introduction of a new online Stop & Search report form, only a small minority of such entries were checked by a Sergeant. Prior to that, with the paper-based system, most (if not all) Stop & Search records had been reviewed by a Sergeant. The Panel were concerned that the introduction of an online form may have contributed to the poor quality in record keeping. The Panel were informed that the current online system was due to be replaced / upgraded. The Panel expressed that they hoped that an automatic checking facility would be included as part of the new online form. It was felt that such an additional quality-check would help to raise standards in this area.

Following the HMIC report the Constabulary had undertaken to complete a training programme for all officers. It was recognised that any student officers were provided with training on the completion of the forms, however no specific training had been provided to other officers within a number of years. All officers would have received the classroom based training by the end of March 2016. Following this it was envisaged that the quality of information provided within stop and search forms would be improved and it was therefore agreed that the Panel would again dip sample stop and search forms prior to their August Panel Meeting.

The T/Deputy Chief Constable thanked the panel for their work and comments, recognising that there were issues that they were aware of, but with training being provided to all officers he was confident that the quality of the information provided would improve.

Home Office Consultation on PCC Complaints

The Home Office were carrying out a consultation process in relation to complaints made against Police and Crime Commissioners. The consultation focused on what constituted a complaint, providing Police and Crime Panels with greater investigatory powers to deal with complaints against Police and Crime Commissioners and clarification on the parameters of informal resolution.

Part of the work carried out by the Ethics and Integrity Panel related to complaints and they were therefore asked to provide any appropriate feedback. This would then be included within the final response from the OPCC. It was agreed that the Panel would co-ordinate their individual responses through the Panel chair and these would be provided to the OPCC by 1 March 2016. A copy of the OPCC's final response would be provided to the Panel upon completion.

3. Supplementary information

Reports presented to the Ethics and Integrity Panel Meeting on 11 November 2015 can be viewed on the OPCC website via the following link:

<http://www.cumbria-pcc.gov.uk/governance-transparency/ethics-integrity-panel.aspx>