

Cumbria Shared Internal Audit Service

Internal Audit Report for Cumbria Constabulary



Audit of Local Focus Hubs

Draft Report Issued: **24th July 2019**

Final Report Issued: **9th September 2019**

Audit Resources

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Audit Report Distribution

For Action:	Rob O'Connor (T/Chief Superintendent)
For Information:	Mark Webster (Deputy Chief Constable)
Audit Committee	The Joint Audit Committee, which is due to be held on 19 th September 2019, will receive the report.

Note: Audit reports should not be circulated wider than the above distribution without the consent of the Audit Manager.

Cumbria Shared Internal Audit Service

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Executive Summary

1. Background

- 1.1 This report summarises the findings from the audit of Local Focus Hubs. This was a planned audit assignment which was undertaken in accordance with the 2018/19 Audit Plan.
- 1.2 Local Focus Hubs and neighbourhood policing are important to the organisation because they contribute directly to the delivery of Police and Crime Plan objectives around working with partner agencies and communities to understand local issues and develop joint, sustainable solutions, tackle crime and anti-social behaviour and provide a visible uniformed presence in neighbourhoods.
- 1.3 Local Focus Hubs were launched in 2018 in each of the six Cumbrian districts. They bring different agencies together in a shared location for collaborative and effective problem solving at a local level. The launch of the Hubs, together with an increase in officers dedicated to neighbourhood policing demonstrates the Constabulary's commitment to working with partners and local communities to address issues within neighbourhoods and secure the best possible outcomes for the public.

2. Audit Approach

2.1 Audit Objectives and Methodology

- 2.1.1 Compliance with the mandatory Public Sector Internal Audit Standards requires that internal audit activity evaluates the exposures to risks relating to the organisation's governance, operations and information systems. A risk based audit approach has been applied which aligns to the five key audit control objectives which are outlined in section 4; detailed findings and recommendations are reported within section 5 of this report.

2.2 Audit Scope and Limitations

- 2.2.1 The Audit Scope was agreed with management prior to the commencement of this audit review. The Client Sponsor for this review was the Deputy Chief Constable. The agreed scope of the audit was to provide assurance over management's arrangements for governance, risk management and internal control in the following areas:
 - Agreed objectives (shared across partner organisations).

- Oversight arrangements.
- Joint decision making, planned outcomes and performance monitoring.
- Consistency of service across the force (delivery of core ethos with minimal local variances).

2.2.2 There were no instances whereby the audit work undertaken was impaired by the availability of information.

2.2.3 It should be noted that testing focused on two of the six districts (Carlisle and Copeland Hubs).

3 Assurance Opinion

3.1 Each audit review is given an assurance opinion and these are intended to assist Members and Officers in their assessment of the overall level of control and potential impact of any identified system weaknesses. There are 4 levels of assurance opinion which may be applied. The definition for each level is explained in **Appendix A**.

3.2 From the areas examined and tested as part of this audit review, we consider the current controls operating around Local Focus Hubs provide **reasonable** assurance.

Note: as audit work is restricted by the areas identified in the Audit Scope and is primarily sample based, full coverage of the system and complete assurance cannot be given to an audit area.

4 Summary of Recommendations, Audit Findings and Report Distribution

4.1 There are three levels of audit recommendation; the definition for each level is explained in **Appendix B**.

4.2 There are **3** audit recommendations arising from this audit review and these can be summarised as follows:

Control Objective	No. of recommendations		
	High	Medium	Advisory

1. Management - achievement of the organisation's strategic objectives (see section 5.1.)		2	
2. Regulatory - compliance with laws, regulations, policies, procedures and contracts (see section 5.2.)			
3. Information - reliability and integrity of financial and operational information (see section 5.3)			1
4. Security - safeguarding of assets (see section 5.4)			
5. Value - effectiveness and efficiency of operations and programmes (see section 5.5)			
Total Number of Recommendations		2	1

4.3 Strengths: The following areas of good practice were identified during the course of the audit:

- There is a designated strategic lead and clear terms of reference for the 'Neighbourhood Policing and Local Focus Project' (Local Focus Hubs).
- Memorandums of Understanding, that clarify aims and objectives, have been prepared for the two Local Focus Hubs reviewed. Partner approval of both documents is evidenced within Community Safety Partnership (CSP) meeting minutes.
- An updated tasking structure is in place that incorporates six community tasking meetings across the six local authority areas to involve partners in the identification of community priorities. Senior officers are involved in the meetings to ensure strategic, national and local issues are considered.
- Two Hubs are now managed by staff from partner organisations rather than the Constabulary and this reinforces the importance of partner involvement and engagement in the initiative.
- Partners meet regularly to share / discuss information so that appropriate, co-ordinated and timely interventions are agreed.
- Management information (intelligence) is produced on a regular basis and shared with partners to highlight key community issues for partner discussion and decision making purposes.
- Community and tasking meetings provide for full discussion of community issues, the development of action plans, allocation of action managers and action tracking with regular updates. This process is embedded into the constabulary tasking process, relying on and contributing to management information that flows throughout the structure and the identification and communication of priority issues.

- Hub Managers attend Safer Neighbourhood meetings on a regular basis to discuss topical issues, share good and bad practice and standardise arrangements across the county.

4.4 Areas for development: Improvements in the following areas are necessary in order to strengthen existing control arrangements:

4.4.1 *High priority issues:* None identified.

4.4.2 *Medium priority issues:*

- The review of Local Focus Hubs, scheduled for February 2019, has not been finalised and reported to management. The review is expected to take account of inconsistent practices across the county and include proposals for moving forwards.
- A Local Focus Hub performance management framework has not been fully consulted on, approved and shared force wide.

4.4.3 *Advisory issues:*

- Information Sharing Agreements are not up to date with clear partner approval.

Comment from the Deputy Chief Constable:

The development of the Neighbourhood Policing Hubs was always going to be an iterative process, with the initial stages focussing on building a proof-of-concept in each district. Local factors and context have led to some differences in approach, and the time is now right with the findings of this review and the transfer of responsibility to Supt Jackson, for more consistency in the model to be applied where this is appropriate. Best practice should be spread across the partner hubs, whilst leaving some room for the further iterative development of new approaches. The review under recommendation 1 will facilitate this happening, and I'm content that the plan laid out will achieve the recommendation. It is of key importance that there is consistency of tasking across the force and through the hubs. Progress towards achieving this recommendation will be monitored by myself and through the Cumbria Constabulary Improvement Plan (CCIP).

The iterative approach taken has also had the effect of leaving some more work to do in finalising the Performance Management Framework. I agree with the thrust of the recommendation, and that the management action, particularly focussing on the use of Power BI dashboards, will greatly enhance visibility of effort and help to establish which approaches work. It is vital that we as a force are able to demonstrate the impact and of the hubs, and progress to achieving this recommendation will be closely monitored.

Thirdly, the action stipulated to direct the consistency of ISA to be used across all hubs by Ch Supt O'Connor is appropriate to the task.

Finally, I note and acknowledge the extensive list of strengths evidenced during the course of the audit and agree that these put us in a strong place to demonstrate the utility of the Hubs to the public.

M Webster

Deputy Chief Constable

30th August 2019

Management Action Plan

5 Matters Arising / Agreed Action Plan

5.1 Management - achievement of the organisation's strategic objectives.

● **Medium priority**

Audit finding	Management response
<p>(a) Force Wide Arrangements</p> <p>Local Focus Hubs were launched in November 2018 in each of the six districts of Cumbria, following a successful pilot in Copeland. A strategic lead was appointed for the Neighbourhood Policing and Local Focus Project, with full time support from a nominated Police Sergeant for the duration of the project. A key requirement of the project, per the Terms of Reference, was to define the operating model for Local Focus Hubs and ensure a consistent approach to community based partnership activity across the county. There is an expectation that the core arrangements and overall ethos of the Local Focus Hubs will provide a level of consistent practice and service to the public whilst taking into account differences across the six Cumbrian districts in terms of crime patterns, partner organisations, levels of engagement etc</p> <p>After eight months of operation Hub Managers report that Local Focus Hubs are becoming increasingly embedded into the force tasking model and working more closely with partners and local communities. However audit testing has highlighted a number of inconsistencies in approach across the force:-</p> <ul style="list-style-type: none"> • A template was not utilised for the drafting of Local Focus Hub Memorandums of Understanding and the resulting documents differ considerably in content and detail across the force, particularly in relation to partner responsibilities. • Local Focus Hub documentation in respect of the referral process was developed and shared by the Copeland Hub to encourage use of a common platform for capturing, prioritising, considering and tracking community issues. This has not been fully adopted across the force 	<p>Agreed management action:</p> <p>This audit clearly shows that good progress has been made to embed the Local Focus Units across the six District Council areas.</p> <p>There is also evidence of good practice being developed across the Force area, with the quarterly Safer Neighbourhoods meetings chaired by the Force lead allowing for the sharing of good practice between Police and partners.</p> <p>As covered in the audit, the Community tasking is becoming embedded, and that will be reviewed by a Senior Detective alongside Force tasking to ensure that the new processes have been successful and deliver what is required.</p> <p>That review will encompass part of this recommendation.</p> <p>On Tues 13 and Wed 14 August 2019 there was a peer review of Neighbourhood Policing (NHP) in</p>

and alternative approaches have been developed.

- One of the intentions of the Local Focus Hub project was to bring partners together in one location for closer working on joint solutions to community issues and maximising outcomes for the public. This has been achieved to some degree in Copeland but with less success in Carlisle. As an alternative, weekly meetings take place with partners in the Carlisle Hub to ensure ongoing and timely engagement. The two Hub Managers in the West of the county are District Council employees, the remaining four are Police Officers and it is considered that this has an impact on partner willingness to share Hub accommodation.
- Force Analysts prepare Community and Tasking reports for each Hub to inform and support decision making at monthly multi-agency Community Tasking and Co-ordination meetings. The reports follow broadly the same format across the Hubs but changes have been made at a local level as the process has moved forwards to respond to specific requests.
- The management information shared with partners remains very much police based with input from partners tending to occur verbally during tasking meetings. Internal Audit attendance at the Safer Governance meeting in July 2019 showed that progress is being made to address this issue, but with varying levels of success across the county.
- Arrangements for sharing Community and Tasking reports with partners are not consistent across the county. Some Hubs restrict sharing of the report to a full on screen version during the tasking meeting, one Hub redacts the names on the report whilst another Hub provides a copy of the report to partners in advance of the monthly meetings.
- The introduction of Local Focus Hubs was supported by the launch of six Local Focus Facebook groups as sub-groups of the main Cumbria Constabulary Facebook page. The pages offer the public the opportunity to liaise directly with a number of agencies, including the police, in one place. In practice, the willingness of partners to respond directly to public comments and queries on Facebook is variable, so too is the volume of posts to be managed.
- There are limited and inconsistent arrangements across the Hubs for seeking feedback from individual complainants and communities regarding how effective intervention and initiatives are perceived to be. Ad hoc feedback is received via social media posts, partners and Borough / Town Councils but it is not collated, analysed or shared across the county.

Cumbria by Northumbria Police. All Forces were encouraged to partake in this peer review, and Cumbria will shortly inspect / review Durham Constabulary.

A team of six officers from Northumbria, led by a Chief Superintendent and Chief Inspector conducted the peer review. They interviewed Police Officers and Staff who worked in the Allerdale Local Focus Unit, various persons from partner agencies, and reviewed the governance arrangements and terms of reference etc. They also interviewed Temp Ch Supt O'Connor as the Strategic lead.

The Northumbria team undertook a hot debrief session and their findings were extremely positive in relation to how NHP is delivered in Cumbria and the benefits of the Local Focus Units, so much so that they want to maintain professional working relations and take some of the best practice they witnessed back to Northumbria. Formal written feedback is awaited.

The Force lead who developed the Local Focus Units (Supt Slater) has recently retired, and will be replaced by Supt Jackson, who will undertake a review of the current position of both NHP and the Local Focus Units, and report back to the Chief

<p>During a Safer Neighbourhood meeting in June 2019, the Project Lead proposed an Away Day for Hub Managers the following month to review a number of shared issues and make plans to address issues moving forwards. The event would provide a timely opportunity to discuss the inconsistencies and issues above, explore solutions, share best practice and success stories and determine actions moving forwards. It could also support an evaluation as to whether the original aim of the Local Focus Hub Project has been achieved, ‘to effectively support the needs of local communities in accordance with the Chief Officer’s vision for neighbourhood policing and the PCC’s Police and Crime Plan’.</p> <p>An Away Day could feed into the planned evaluation of the tasking model across the force, as recorded in the Crime and TPA Risk Register. The evaluation was scheduled to take place in February 2019 and whilst work is progressing a formal report has not been finalised and reported. This issue has also been identified in an internal audit review of Force Tasking that has been reported separately</p>	<p>Officer Group once she is in post.</p>
<p>Recommendation 1:</p> <p>A review of Local Focus Hubs should be finalised and reported to senior management. The review should take account of the inconsistent practices across the county and include proposals for moving forwards.</p>	
<p>Risk exposure if not addressed:</p> <ul style="list-style-type: none"> • Failure to achieve strategic priorities. • Missed opportunities to continuously learn and improve. • Difficulties engaging partners. 	<p>Responsible manager for implementing: Supt Sarah Jackson</p> <p>Date to be implemented: December 2019</p>

- **Medium priority**

Audit finding	Management response
<p>(b) Performance Management Framework</p> <p>The Corporate Improvement Team has developed a performance management framework (PMF) for Local Focus Hubs that comprises 48 performance indicators and ensures the information collected meets Force Management Statement requirements. There was some consultation with the Copeland Hub Manager during the development.</p> <p>In April 2019 each Hub was asked to provide performance figures for the period from Hub creation to 31st March 2019. Training and guidance was not provided to Hub Managers to assist them in completing the returns accurately and consistently. At the time of the audit review feedback had not been provided regarding any collation or analysis of results at a force wide level. This type of analysis could contribute to an evaluation of Local Focus Hub effectiveness (see section 5.1a above). It would give an indication of progress towards aims and objectives and whether Hubs are making a difference to communities. Regular performance information would also inform decision making at a strategic and local level, target activity and help to shape improvements going forwards.</p> <p>At a Safer Neighbourhood meeting in June 2019 the Allerdale Hub Manager reported current work being undertaken with a Force Analyst to challenge and further develop the existing performance framework. The planned Away Day for Hub Managers was cited as an opportunity to share and discuss developments.</p>	<p>Agreed management action:</p> <p>The Local Focus Unit Performance Framework (PF) was developed in consultation with the existing Units and Corporate Support and distributed in early 2018 to each of the developing Units.</p> <p>There has been a different pace of development across the County which made it challenging to implement it in its entirety in each location.</p> <p>The Constabulary now have the added bonus of Power Business Intelligence and support from Corporate Development, combined with the audit expertise of Emma Thompson as the manager of Allerdale LFU.</p> <p>Emma has reviewed the PF to make it more relevant to partners, and Corporate Development are looking to systemise it to make production of a performance document simpler and more user friendly.</p>
<p>Recommendation 2:</p> <p>A PMF should be agreed and shared following full countywide consultation that further supports and informs the identification of priorities and targeted interventions.</p>	<p>The national problem solving team are awaiting an update on this issue as Cumbria Constabulary are very much in the driving seat nationally in terms of the development of a representative performance framework.</p>

<p>Risk exposure if not addressed:</p> <ul style="list-style-type: none"> • Poor decision making. • Wasted resources. • Failure to continuously learn and improve. 	<p>Responsible manager for implementing: Supt Sarah Jackson</p> <p>Date to be implemented: December 2019</p>

5.2 Information - reliability and integrity of financial and operational information.

● **Advisory issue**

Audit finding	Management response
<p>(a) Information Sharing Agreements</p> <p>Both Carlisle and Copeland Hubs refer to their Community Safety Partnership Information Sharing Agreements (ISA) as providing the basis for lawful exchange of information between Hub partners. Both agreements are out of date as they don't reflect the GDPR requirements of the Data Protection Act 2018. The approval and signatures of partners cannot be demonstrated for the Carlisle Hub.</p> <p>At the time of the audit review The Carlisle Hub Manager was in the process of re-drafting and updating the Carlisle & Eden ISA with the support of the HQ GDPR project team, expecting to receive partner approval and sign-off within a few weeks. The draft version includes provision for annual review.</p> <p>The Copeland Hub ISA was scheduled for review in November 2018, this review has not yet taken place.</p>	<p>Agreed management action:</p> <p>The Allerdale Local Focus Unit have recently developed an ISA that has been reviewed by the Constabulary's Legal Dept and GDPR team in Corporate Support.</p> <p>This ISA is seen as best practice and an excellent template to use, and a direction has been issued by Temp Chief Supt O'Connor to the six NPT Insp from the Local Focus Units to use the Allerdale ISA as a template and ensure all relevant partners are signed up to the ISA.</p>

Recommendation 3:

Information Sharing Agreements should be subject to regular review to ensure they are kept up to date and include the approval of all current partners.

Risk exposure if not addressed:

- Sanctions and litigation arising from non-compliance with data protection legislation and data breaches.
- Reputational damage arising from non-compliance with data protection legislation and data breaches.

Responsible manager for implementing:

Supt Sarah Jackson

Date to be implemented:

December 2019

Appendix A

Audit Assurance Opinions

There are four levels of assurance used; these are defined as follows:

	Definition:	Rating Reason
Substantial	There is a sound system of internal control designed to achieve the system objectives and this minimises risk.	<p>The controls tested are being consistently applied and no weaknesses were identified.</p> <p>Recommendations, if any, are of an advisory nature in context of the systems and operating controls & management of risks.</p>
Reasonable	There is a reasonable system of internal control in place which should ensure that system objectives are generally achieved, but some issues have been raised which may result in a degree of risk exposure beyond that which is considered acceptable.	<p>Generally good systems of internal control are found to be in place but there are some areas where controls are not effectively applied and/or not sufficiently developed.</p> <p>Recommendations are no greater than medium priority.</p>
Partial	The system of internal control designed to achieve the system objectives is not sufficient. Some areas are satisfactory but there are an unacceptable number of weaknesses which have been identified and the level of non-compliance and / or weaknesses in the system of internal control puts the system objectives at risk.	<p>There is an unsatisfactory level of internal control in place as controls are not being operated effectively and consistently; this is likely to be evidenced by a significant level of error being identified.</p> <p>Recommendations may include high and medium priority matters for address.</p>
Limited / None	Fundamental weaknesses have been identified in the system of internal control resulting in the control environment being unacceptably weak and this exposes the system objectives to an unacceptable level of risk.	<p>Significant non-compliance with basic controls which leaves the system open to error and/or abuse.</p> <p>Control is generally weak/does not exist. Recommendations will include high priority matters for address. Some medium priority matters may also be present.</p>

Grading of Audit Recommendations

Audit recommendations are graded in terms of their priority and risk exposure if the issue identified was to remain unaddressed. There are three levels of audit recommendations used; high, medium and advisory, the definitions of which are explained below.

Definition:		
High	●	Significant risk exposure identified arising from a fundamental weakness in the system of internal control
Medium	●	Some risk exposure identified from a weakness in the system of internal control
Advisory	●	Minor risk exposure / suggested improvement to enhance the system of control

Recommendation Follow Up Arrangements:

- High priority recommendations will be formally followed up by Internal Audit and reported within the defined follow up timescales. This follow up work may include additional audit verification and testing to ensure the agreed actions have been effectively implemented.
- Medium priority recommendations will be followed with the responsible officer within the defined timescales.
- Advisory issues are for management consideration.