

Chief Constable's Report  
to  
Kent Police and Crime Commissioner's Performance and Delivery Board

**INSPECTIONS, AUDITS & REVIEWS**

Wednesday 5<sup>th</sup> June 2019

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**1. Strategic Overview.**

Policing is an increasingly regulated public service and the overarching responsibility for governance is set out in the Police Reform and Social Responsibility Act 2011. The legislative framework is complemented by the Policing Protocol 2011 (which came into force in January 2012) and covers the scope of the Act and the specific responsibilities of the key stakeholders including both the Police and Crime Commissioner (PCC) and the Chief Constable. Amongst those responsibilities the protocol states the PCC should: 'scrutinise, support and challenge the overall performance of the Force' and the utilisation of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS) inspections and others audits and reviews of the force enables the PCC to monitor specific areas of the force that are third party under scrutiny.

**2. Aims of the report.**

This report will record the key detail of the latest or ongoing inspections, audits or other reviews that have taken place since the last PCC Performance and Delivery Board on 20<sup>th</sup> March 2019.

**3. Her Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS).**

The role of HMICFRS is to inspect and report on the efficiency and effectiveness of police forces and specified national police agencies. HMICFRS's overall objective is to provide, in the public interest, independent and professional assessments of police efficiency, effectiveness and legitimacy for the public, their elected representatives and the police.

**3.1 HMICFRS PEEL Inspection 2018/2019.**

During the second week of December 2018, Kent Police was subject to its first fully integrated HMICFRS 'PEEL' inspection.

Kent were one of 14 forces nationally to be inspected using a new integrated PEEL methodology (IPA). This entailed the force being open throughout the year to regular, structured visits (called insight visits) by our HMICFRS liaison officer. Alongside this, HMICFRS drew down on extensive data and other management information about the Force. This rich picture gave HMICFRS sufficient for it to determine which areas it wanted to inspect during its in-force field work which took place between 10 December and 14 December 2018. HMICFRS refer to this as a risk-based approach.

The following table shows the areas Kent Police were inspected against in 2018/19:

Item 4

IPA area	Inspected in 2018/19
Preventing crime and anti-social behaviour	No
Investigating crime	Yes
Protecting vulnerable people	Yes
Tackling serious and organised crime	No
Firearms capability	Yes
Meeting current demands	No
Planning for the future	Yes
Treating the public fairly	No
Ethical and lawful workforce behaviour	Yes
Treating the workforce fairly	No

Below is a summary of the inspection findings as reported by HMIC Inspectors:

 <b>Effectiveness</b>	 <b>Good</b>	<b>Last inspected</b>
Preventing crime and tackling anti-social behaviour	 Good	2016/17
Investigating crime	 Good	2018/19
Protecting vulnerable people	 Good	2018/19
Tackling serious and organised crime	 Good	2016/17
Armed response capability	Ungraded	2018/19

Item 4

	<b>Efficiency</b>	 <b>Outstanding</b>	<b>Last inspected</b>
Meeting current demands and using resources	 Outstanding	2017/18	
Planning for the future	 Outstanding	2018/19	
	<b>Legitimacy</b>	 <b>Outstanding</b>	<b>Last inspected</b>
Fair treatment of the public	 Outstanding	2017/18	
Ethical and lawful workforce behaviour	 Good	2018/19	
Fair treatment of the workforce	 Outstanding	2017/18	

Source: PEEL Police Effectiveness, efficiency and legitimacy 2018/19 An Inspection of Kent Police, Her Majesty’s Inspectorate of Constabulary (2019)

PEEL Inspection in Context

The results of Kent’s inspection are, by any standards, impressive. The pressures on the Force from additional reported crime and calls from the public for help and assistance are at unprecedented levels. Additionally, until the recent PCC led increases in the budget, these excellent inspection outcomes have been secured by a workforce that had been subject to significant reductions in strength.

Kent’s achievements are further underlined when a comparison is made of the 13 other forces inspected in HMICFRS’s most recent tranche. Only one other force in this group was awarded ‘outstanding’ in two of PEEL’s three categories (Durham – in ‘effectiveness’ and ‘efficiency’). Kent remain the only force in the country to have so far secured ‘outstanding’ in the domain of ‘legitimacy’ – now four years in succession.

It is important to note the HMICFRS’s methodology does not rest just upon 4 days of intensive in-force/ inspection (called by HMICFRS ‘field’ work). Of course, this is part of the picture and a very important one. But the ‘on the ground’ inspection is only one of the elements used in assessing and grading forces. HMICFRS harvest huge sets of data and management information about a Force’s performance. This occurs throughout the year and the inspectorate use this material to make risk assessments on a Force and identify those areas it wishes to focus upon during its field work.

## Item 4

Layered upon this is also what HMICFRS refer to as 'insight visits'. These visits, by our HMICFRS liaison officer (a police superintendent seconded to HMICFRS from another force), centre upon topics or issues HMICFRS wish to explore in more depth and often end up as subjects of specific focus in the field visit. Insight visits are frequent, probing and represent a level of accountability that would not be visible to the general public.

Under the direction of the Chief Constable, Kent has welcomed external inspection (of any kind). It has never sought to avoid or obfuscate scrutiny and accountability - neither has it taken an adversarial stance towards HMICRS. Kent Police respect deeply the independence of the inspectorate and that it conducts its inspections in the public interest.

### Specific Gradings

#### **Effectiveness**

Kent Police have been assessed as 'good' in this domain – the same as last year's outcome. The inspectors found the Force good at investigating crime and protecting vulnerable people from harm.

The inspectors did, however, highlight some areas it felt the Force needed to address. They were, under the relevant 'effective' heading:

#### Investigating Crime

- Ensuring the Force's new IT system (Athena) does not impact upon the timely and effective allocation of crime for investigation.
- Not closing down investigations too early where the victim does not support a prosecution. HMICFRS have asked the Force to look again at the way it handles victims who do not wish to support proceedings.
- The quality of investigations conducted by uniformed officers.
- The supervision of investigation.
- Investigation workload distribution.
- Ensuring better processes between the Force's Incident Management Unit (where crimes are assessed for investigative leads), and the territorial divisions where some crimes are sent and allocated to police officers for investigation.
- Make sure all officers have access to investigative support, advice and guidance.

#### Protecting Vulnerable People

- Better application, especially amongst new staff, of the Force's risk assessment tool (THRIVE) used in its Force Control Room to assess vulnerability.
- Tackle increasing workloads in the Police Online Investigation Team (POLIT).

#### **Efficiency**

The Force were judged by HMICFRS to be outstanding at future planning and were using its resources wisely and efficiently. They strongly praised the Force's financial management and its wider approach to leadership and the development of future leaders.

#### **Legitimacy**

Because of the Force's excellent record in this domain over the last 3 years, some areas of 'legitimacy' were not directly inspected in 2018. However, HMICFRS did examine areas such as

## Item 4

vetting, tackling corruption and ethical practice, and found high standards across the board. The inspectorate raised only one area for attention in this domain – relating to our capacity in the Force Professional Standards department to investigate certain types of corruption.

### The Overall Picture

As has been mentioned, Kent's overall HMICFRS PEEL assessment for 2018/19 is strikingly positive - no other force in the country has obtained 'outstanding' in the domains of 'legitimacy' and 'efficiency' together, and only one other force holds, like Kent, two 'outstanding' assessments. The ambition now of the Force is to make progress in 'effectiveness', whilst retaining its position in the domains of 'legitimacy' and 'efficiency'.

In its formal inspections HMICFRS usually leave a Force with a number of areas for improvement (AFIs) - this is no different for Kent.

The following AFIs are:

#### In Investigating Crime

- 'The Force should ensure it progresses cases effectively, even if the victim does not support the investigation, and that officers understand the importance of this'.

#### In Protecting Vulnerable People

- 'The Force should, within three months, review its use of THRIVE within the Control Room and the Incident Management Unit (IMU) and ensure that staff understand the importance of correctly assessing incidents'.
- 'The Force should, within three months, review its IMU recovery plan to ensure it gives victims an appropriate service'.
- 'The Force should review demand and capacity in its police online investigation team (POLIT) and reduce the backlogs in the department'.

#### In Ethical & Lawful Workforce Behaviour

The Force should ensure its counter corruption unit:

- Has sufficient capability and capacity to be effective in its proactive approach to counter corruption; and
- Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force's data and identify computer misuse.

The Force should ensure it builds effective relationships with the groups and organisations that support and work with vulnerable persons.

### The Future

The Force is already energetically addressing the specific areas for improvement. But we have also looked at the broader narrative coming from our 2018/19 integrated PEEL report, and have sought to distil from this material other important areas/issues where improvement could and should be made. The Chief Constable has made clear his intention to tackle effectiveness, with investigations and better support to victims being at the heart of that work.

## **4. Internal and External Audit Functions.**

### **4.1 Internal Audits.**

4.1.1 A summary of the 2018/19 internal audit opinions is attached below along with the agreed programme of audits for 2019/20. Overall progress has been very good for the last financial year

Item 4

with most areas maintaining their assurance levels or improving upon them. Those areas which have negative assurance levels continue to have the highest degree of management attention and these areas are briefly outlined below.

4.1.2 For the financial year 2018/19 four areas of business have returned with Substantial Assurance: Debt collection and recovery; Capital Accounting and fixed assets; Payroll and Treasury Management. Four have reasonable assurance: Pension Scheme Governance, Business Continuity, Leavers and Movers and Fleet Management & use of Telematics. Two have partial assurance: Creditors and POCA/Cash/Drug/ Property Seizures. None were returned with no assurance.

Assurance rating			
None	Partial	Reasonable	Substantial
	Creditors	Pension Scheme Governance	Debt collection and recovery
	POCA/Cash/Drug/ Property seizures	Business Continuity	Capital accounting & fixed assets
		Leavers and Movers	Payroll
		Fleet Management & Use of Telematics	Treasury Management

4.1.3 Improvements were seen in POCA, Leavers and Movers and the Payroll audits with each showing increased assurance levels over the previous year's audits. This demonstrates the value of the audits in identifying weaknesses in systems and processes and in agreeing realistic, achievable and timely action plans to address any recommendations. The creditors audit slipped from Reasonable to Partial Assurance this year following a change to a process aimed at reducing the bureaucracy and paper-based approach to authorising the weekly Payment Run. Once identified by the audit team this process was reverted to the previous process to maintain the integrity of the control framework. Opportunities to improve processes will continue to be evaluated by a working group between Business Services and Finance with oversight by the Chief Finance Officer to ensure the controls remain robust and capable of withstanding audit scrutiny whilst optimising the processes.

4.1.4 The recommendations from the recent POCA audits continue to be the focus of a working group chaired by the ACC for the Serious Crime Directorate. Excellent progress continues to be made across the business and work continues to ensure these processes are embedded. This work includes dip sampling and spot checks aimed at providing assurance that the new controls, protocols and policies are being followed force-wide.

4.1.5 The 2019/20 internal audit plan has been agreed between RSM, the CFOs for the Force and Commissioner with key strategic inputs from the Deputy Chief Officer and Director of Support Services. The agreed programme follows an evaluation of the Kent Police and OPCC risk registers by the auditors. The plan for 2019/20 is summarised in the table below:

Audit area	Number of audit days	Proposed timing
IT Audit (Joint)	20	Q2/3
Medium Term Financial Plan and savings plan	14	Q2
Budget build	10	Q3
Communications and engagement	12	Q3
Road risk action plan and Insurance (Joint)	6	Q1
7 Force Collaboration (Joint)	4	Q3
Estates strategy – sale of assets	12	Q3
Risk management	10	Q1

## Item 4

Treasury Management	8	Q3
General Ledger	8	Q3
Creditors	10	Q3
Capital Accounting and Fixed Assets	10	Q2
Payroll	10	Q2
Firearms storage and destruction	12	Q1
Body worn video (Joint)	6	Q1
Vehicle Telematics	10	Q2
Covert funds	10	Q1
Follow up	10	Q1 & Q4

As with previous years' programmes there may be some movement and rescheduling of audits within the overall framework in order to manage staff absences and demands of work. Any such changes will be agreed between auditors, business leads and CFOs and reported at the Joint Audit Committee as part of the regular updates.

### **4.2 External Audit.**

4.2.1 Our auditors, EY, were on site again in March to undertake the planned 'soft-close' / interim audit and were again impressed with the quality and timeliness of the documents the Finance Team had produced. This adds the assurance EY have in Kent Police and no significant issues are expected or foreseen for the year-end audit which started on 29<sup>th</sup> April.

4.2.2 The Kent Finance Team continue to work well with our External Auditors and have agreed an earlier year-end audit this year given the excellent progress the team have made in recent years. As mentioned above EY were on site w/c 29<sup>th</sup> April and are expected to remain for four weeks to undertake and conclude their audit.

4.2.3 Regular formal update meetings are scheduled between the lead auditor and the CFOs with informal meetings happening daily between the on-site audit manager and Chief Accountant. This approach has proved extremely useful in previous years and helps increase transparency between the two teams and enables early action should the need arise.

4.2.4 Progress for the annual Accounts of the Group, PCC and Chief Constable is well on track to meet the very high standard and agreed tight timescales with the Final Accounts scheduled to being signed off in early July, well ahead of the statutory deadline of 31<sup>st</sup> July.

### **5. Risks.**

This paper conveys a breadth of scrutiny, governance and monitoring arrangements that are established and embedded. When these work streams are combined together they may appear to be extensive in volume. It is important to ensure that such events are where possible 'joined-up' and duplication is avoided.

Overall, the outcomes of the foregoing events and processes often lead to improvement opportunities and the Force has gained a reputation for being transparent in the audit process and both receptive and responsive of the recommendations that may follow.

### **6. Summary.**

The Force welcomes and benefits from varying levels of scrutiny and governance. It will continue to strive for further improvements as part of the new integrated PEEL assessments, which will be commencing later this year. This demonstrates our commitment and drive to provide the very best

#### Item 4

service to victims, witnesses and the people of Kent. The extensive programme of internal inspections also reflects the Force's commitment to provide a quality service across all of our business.