

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

INSPECTIONS, AUDITS & REVIEWS

Thursday 31 May 2018

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 7th March 2018.

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

HMICFRS' role 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 and effectiveness for the public, elected representatives and the police.

3.1 PEEL Effectiveness. During November 2017, the force was inspected as part of the PEEL Effectiveness inspection. The force was assessed against three core questions:

- How effective is the force at investigating crime and reducing re-offending?
- How effective is the force at protecting those who are vulnerable from harm, and supporting victims?
- How effective are the force's specialist capabilities?

The report was published on 22nd March 2018. Kent Police received an overall effectiveness grade of **GOOD** and individual core question grades as follows:

- Preventing crime and tackling anti-social behaviour – **GOOD**
- Investigating crime and reducing re-offending – **GOOD**
- Protecting vulnerable people – **GOOD**
- Tackling serious and organised crime – **GOOD**

The HMICFRS commented within the report that the force 'continues to make positive improvements in terms of its effectiveness'. The force was also praised for implementing the new policing model [New Horizon]. Furthermore, the report concludes that: 'The force has a good understanding of the nature and scale of vulnerability throughout Kent. Dealing with vulnerable people is a well-established part of its daily business. The force works well in responding to victims who are vulnerable and in investigating crimes committed against them'. The force was also praised for working well with partners to support and safeguard victims and the work undertaken around mental health.

There was one 'area for improvement' identified by HMICFRS under effectiveness: 'The force should ensure that all investigations are completed to a consistently good standard and in a timely manner so that victims receive an appropriate level of service'. This is being addressed through an extensive programme of work (Recital) which is looking to put victims and witnesses at the heart of everything the force does by investigating crime effectively and achieving the right outcome. This work is led by Assistant Chief Constable Shiner and consists of a number of strategic and tactical groups across the force. These groups closely monitor and review investigation performance, investigative guidance, policy, internal communications, inspection findings, training requirements and detective capability/capacity. A full inspection of Op Recital will commence in late May 2018.

3.2 PEEL changes. As detailed in the last paper presented to the PCC Performance and Delivery Board, the HMICFRS PEEL inspection programme for 2018/19 is set to change, moving from three individual inspections to one integrated inspection covering all three PEEL pillars. The force has been notified by HMICFRS that Kent Police would be in the first tranche of forces to be inspected. This means that the force's PEEL inspection will take place in December 2018, an exact date is not yet known.

3.3 Thematic and Joint Inspections. In addition to the PEEL inspections, HMICFRS also carry out thematic and joint inspections. Kent Police have not specifically featured in any of these inspections but the national findings represent learning opportunities. The following national thematic report has been published:

- Out-of-court disposal work in youth offending teams.

These reports often highlight national trends and issues. Any recommendations are acted upon or best practice adopted.

3.4 Force Management Statements (FMS). As detailed in the last PCC Performance and Delivery Board paper, the force is preparing its first draft FMS, designed to improve and streamline the information police forces produce for their own management purposes, the PCC, Home Office, HMICFRS, other public institutions and the public.

A weekly FMS Governance Board, chaired by T/Assistant Chief Constable Corbishley is held to monitor progress. Representation from the PCC's Office is included within the Board. Bi-weekly, the FMS Delivery Team continue to engage with colleagues across the Seven Force Alliance, where progress and best practice is shared. The Kent team continue to work closely with their Essex counterparts.

Recently the HMICFRS held an FMS briefing session in London, which was attended by the Kent team. It was recognised that different approaches had been taken nationally in respect of the FMS submission. Kent's draft FMS will be circulated to Chief Officers for review and feedback in May, with a final draft copy provided to the Chief Constable and PCC in due course. The final FMS is due to be submitted to HMICFRS by 22nd June 2018.

HMICFRS have directed that FMS2 will be required by September 2018 and will be used to make the relevant risk based assessments to determine inspection areas for the force. It is also likely that FMS2 will be subject of national comparison between forces and potential grading criteria (not yet disclosed).

4. Internal and External Audit functions.

4.1 Internal Audits. The PCC appoints the internal auditors to obtain assurance around financial governance and areas of perceived risk. The last financial year's internal audits (from RSM UK) were as follows:

Item No. 5

Title of audit	Assurance level	Final report issued	Recommendations		
			Low	Medium	High
Leavers and movers	Partial	28-Jul-17	5	2	1
Procurement Improvement Plan	Reasonable	23-Aug-17	3	2	0
Capital Accounting and Fixed Assets	Substantial	10-Nov-17	2	0	0
Creditors	Reasonable	05-Sep-17	2	4	0
Debt collection and recovery	Reasonable	05-Sep-17	4	3	0
Firearms storage and disposal and Taser Stock Control	Partial	05-Sep-17	2	6	2
General Ledger	Substantial	04-Dec-17	4	0	0
Payroll	Reasonable	14-Nov-17	2	2	0
Mobile First	Substantial	29-Nov-17	4	1	0
Risk Management - assurance	Partial	17-Jan-18	0	3	0
Treasury Management	Substantial	29-Jan-18	0	1	0
POCA/Cash/Drug/Property seizures	None	04-Dec-17	4	4	3

Of the twelve audits in the financial year, eight had positive assurance levels, three with partial assurance and only one, POCA (Proceeds of Crime Act) with no assurance. All recommendations are taken very seriously with recommendations by the auditors designed to strengthen controls and improve efficiency and effectiveness.

Whilst all audits are reviewed, those with negative assurance opinions are scrutinised more closely and by a wider audience. The POCA audit was completed in August 2017 and included end to end processes surrounding POCA including the seizure of property and drug storage. Failings were identified around use of correct packaging and storing property at satellite stations for longer than outlined in the operating procedure. Following the audit, a robust action plan has been put in place to rectify the failings identified and with the exception of two longer term actions, these failings have been addressed. The longer term actions involve the need for property handling training for new recruits, and how Athena will be used to provide greater audit for cash seizure processes. The ongoing governance of the end to end POCA processes and the outstanding actions will be monitored through the newly formed Joint Kent and Essex POCA board chaired by the Assistant Chief Constable for the Serious Crime Directorate.

Finance has proposed the implementation of Single Points of Contact (SPOCs) across the business reporting back to the Chief Finance Officer's (CFO) nominated representative. These SPOCs will be charged with the delivery and continual assurance that the recommendations are in place, embedded and being actively used. This will help ensure processes are optimised and future inspections show strong processes and adequate or good controls. This proposal was welcomed at a recent Chief Officer meeting and will be worked up as part of an internal audit governance paper.

The audits with substantial assurance give evidence of good practice across their breadth but business change and new risks can emerge in old areas. Complacency is guarded against by the proposed use of SPOCs and also by utilising the full range of RSM's expertise in passing on industry best practice through their reports and discussions with management.

The programme for 2018/19 was agreed in principle at the Joint Audit Committee on 13th March 2018, following consultation with the Force CFO, Director of Support Services, Director of Corporate Services and the CFO for the Commissioner. Given the extent of the programme, there may be some slippage or rescheduling which will be agreed between the CFOs and the Auditor Manager.

Internal audit programme for 2018/19		
Risk Based Assurance		
Athena	Assurance	Q4
IT Audit	Assurance	Q2/3
GDPR (OPCC)	Advisory	Q1
Business Continuity	Assurance	Q2
Restorative Justice	Advisory	Q1
Collaboration - 7F Force Procurement	Advisory	Q3
Collaboration - Recharges (Joint audit)	Assurance	Q2
Delivery of the Police and Crime Plan	Assurance	Q1
Complaints	Assurance	Q3
Body worn cameras	Assurance	Q4
Fleet Management	Assurance	Q2/3
Core assurance		
Treasury Management	Assurance	Q2
Capital Accounting & Fixed Assets	Assurance	Q2
Payroll	Assurance	Q3
Debt collection and recovery	Assurance	Q3
Creditors	Assurance	Q3
Payroll and Pension payments to HMRC	Advisory	Q2
Other internal audit activity		
Custody management	Assurance	Q3
Leavers and joiners	Assurance	Q1
Training records	Assurance	Q3
Pension scheme governance	Assurance	Q1
POCA/Cash/Drug/Property seizures	Assurance	Q2
Performance management	Assurance	Q3
Health and Safety	Assurance	Q4
Follow up	Assurance	Q4

The Force CFO will present a quarterly paper to Chief Officers summarising the activity and assurance level of all audits over the period. This report will include the number and category of recommendations and for those reports with negative assurance will include full details of the recommendations, agreed management action and implementation timescales.

4.2 External Audit. In addition to the above internal auditors the force and PCC have external auditors who perform the statutory function of undertaking the review of the Statement of Accounts and stating a value for money conclusion. The current external auditors are Ernst & Young. The external audit started on 30th April 2018 and is scheduled for three weeks before management review and planned sign off in June 2018.

The Joint Audit Committee includes standing agenda items from both the Internal and External Auditors with both the CFOs for the PCC and Chief Constable present.

5. Force Inspectorate activity.

As well as collating evidence and preparing the force for HMICFRS PEEL and thematic inspections the Force Inspectorate also conduct a number of internal inspections and post implementation reviews (PIRs). The internal inspection programme covers a wide range of business areas commissioned by the Deputy Chief Constable. Any recommendations from the inspections and PIRs are assigned to a strategic lead and managed through the force's recommendation tracker. The following internal inspections have been completed in the last three months:

- Victim code – inspecting compliance with the statutory guidance contained within the code as to what services must be provided to victims of crime by the police service.
- Idea Drop - a benefits analysis of the project based on the provisions of the original business case.

The Inspectorate is currently undertaking a child protection inspection, which is near to completion, as well as a review of the Citizens in Policing programme. There are ten future inspections that have been commissioned by the Deputy Chief Constable and will be built into the 2018/19 inspection schedule. This includes Op Recital, hate crime, rape and sexual offences, stop and search and complaints.

6. 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 to the recommendations that may follow.

7. Police and Crime Plan.

Much of the internal review and inspection functions are directly linked to both the Kent Control Strategy and the PCC's Police and Crime Plan. Externally, HMICFRSs PEEL and other activity cover all of the priorities within the plan.

8. Summary.

The force welcomes and benefits from varying levels of scrutiny and governance. Whilst pleased with the recent findings and grading following the PEEL Effectiveness inspection the force 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 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.