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Our reference: JAC/IR

Date: 8 November 2021

AGENDA

TO: THE MEMBERS OF THE JOINT AUDIT COMMITTEE

CUMBRIA POLICE & CRIME COMMISSIONER AND CUMBRIA CONSTABULARY JOINT AUDIT COMMITTEE

A Meeting of the Joint Audit Committee will take place on **Wednesday 17th November 2021** via Microsoft Teams (TBC), Police Headquarters, Carleton Hall, Penrith, at **10:30am**.

**Vivian Stafford, Gill Shearer
Chief Executive**

Note: Members are advised that allocated car parking for the meeting is available in the Visitors' Car Park.

Note: If members of the public wish to participate in this meeting please contact inge.redpath@cumbria.police.uk by 8th November 2021 for a calendar invitation.

Please note – there will be a private members development session from 2pm to 4pm

COMMITTEE MEMBERSHIP

Ms Fiona Moore (Chair)
Mr Jack Jones
Mr Malcolm Iredale
Wing Commander (Retired) Tim Mann

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 AND MATTERS ARISING

To receive and approve the minutes of the committee meeting held on 4th November 2021

5. ACTION SHEET

To receive the action sheet from previous meetings.

6. CORPORATE UPDATE

To receive a briefing on matters relevant to the remit of the Committee.

(To be presented by the Deputy Chief Constable, OPCC Chief Executive and Chief Finance Officer)

7. STRATEGIC RISK REGISTER

To consider the OPCC and Constabulary strategic risk register as part of the Risk Management Strategy. *(To be presented by the OPCC Chief Executive and the Chief Finance Officer)*

a. OPCC Strategic Risk Register

b. CC Strategic Risk Register

8. INTERNAL AUDIT – PROGRESS REPORT

To receive a report from the Internal Auditors regarding the progress of the Internal Audit Plan. *(To be presented by Audit Manager)*

9. INTERNAL AUDIT REPORT(S)

To receive reports from the Internal Auditors in respect of specific audits conducted since the last meeting of the committee. *(To be presented by the Audit Manager)*

- a. Agile Workforce (OPCC) - Aug 21
- b. Agile Workforce (Constabulary) - Oct 21

The following Internal Audit report has been completed within the last quarter and has been reviewed by the Committee members. A copy of this audit report is available to view on the OPCC website.

- a. OPCC Complaint Review Process (OPCC) - Sep 21

10. PCC ANNUAL REPORT

To receive a copy of the PCC's 5th Annual Report for 2020-2021. *(To be presented by the OPCC Chief Executive)*

11. MONITORING OF AUDIT, INTERNAL AUDIT AND OTHER RECOMMENDATIONS AND ACTION PLANS

To receive an updated summary of actions implemented in response to audit and inspection recommendations. *(To be presented by the Chief Finance Officer)*

12. ANNUAL EXTERNAL AUDIT REPORT

To receive from the External Auditors the Annual Audit Report *(To be presented by the Grant Thornton)* *This paper has been deferred to the March meeting as it will need to follow the Value For Money audit opinion which has to be issued by 4 February 2022.*

13. ANNUAL REVIEW OF GOVERNANCE

To review the OPCC and Constabulary arrangements for governance

- a. Role of the Joint Chief Finance Officer *(To be presented by the Deputy Chief Finance Officer)*
- b. Joint Procurement Regulations *(To be presented by the Head of Commercial)*
A verbal update will be provided at the meeting.
- c. OPCC Arrangements for Anti-fraud & Corruption/Whistleblowing *(To be presented by the Chief Executive)*
- d. Constabulary Arrangements for Anti-fraud & Corruption/Whistleblowing *(To be presented by the Head of Professional Standards)*
- e. Joint Audit Committee Terms of Reference and Role Profiles *(To be presented by the Deputy Chief Finance Officer)*

- 14. ANNUAL GOVERNANCE STATEMENT DEVELOPMENT AND IMPROVEMENT PLAN UPDATE**
To receive an update on progress against the development and improvement plan within the annual governance statement *(To be presented by the Chief Finance Officer)*
- 15. PROCUREMENT ANNUAL REPORT**
To receive an annual Procurement Report and Dashboard *(To be presented by the Head of Commercial)*
- 16. TREASURY MANAGERMENTS ACTIVITIES**
To receive for information reports on Treasury Management Activity - Quarter 2. *(To be presented by the Deputy Chief Finance Officer)*
- 17. POINT FOR CONSIDERATION BY THE COMMISSIONER AND THE CHIEF CONSTABLE**

Future JAC Meeting Dates (For Information)

16th March 2022 @ 10.30am – Conference Room 2/Microsoft Teams
22nd June 2022 @ 10.30am – Conference Room 2/Microsoft Teams
21st September 2022 @ 10.30am – Conference Room 2/Microsoft Teams
23rd November 2022 @ 10.30am – Conference Room 2/Microsoft Teams
22nd March 2023 @ 10.30am – Conference Room 2/Microsoft Teams

Future Police & Crime Panel Meeting Dates (For Information)

25 January 2022 – Conference Room A/B, Cumbria House, Botchergate, Carlisle, CA1 1RD
5 April 2022 – Venue TBC
19 July 2022 – Venue TBC
XX September 2022 – Venue TBC
XX November 2022 – Venue TBC

Agenda Item 4 – Part 1

CUMBRIA POLICE & CRIME COMMISSIONER AND CUMBRIA CONSTABULARY

JOINT AUDIT COMMITTEE

Minutes of a meeting of the Joint Audit Committee held on Thursday 4th November 2021 by Microsoft Teams, Police Headquarters, Carleton Hall, Penrith, at 10.30am.

PRESENT

Mrs Fiona Daley (Chair)
Ms Fiona Moore
Mr Jack Jones
Mr Malcolm Iredale
Wing Commander (Retired) Tim Mann

Also present:

Chief Executive (CE), Office of the Police and Crime Commissioner (Vivian Stafford)
Chief Constable (CC), Cumbria Constabulary (Michelle Skeer)
Police and Crime Commissioner (PCC) (Peter McCall)
Joint Chief Finance Officer (JCFO), (Roger Marshall)
Deputy Chief Finance Officer (DCFO), (Michelle Bellis)
Engagement Lead (EL), Grant Thornton LLP (Michael Green)
Engagement Manager (EM), Grant Thornton LLP (Gareth Winstanley)
Associate (Assoc), Grant Thornton LLP (Ben Hall)
Financial Services Manager (FSM), (Lorraine Holme)

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

The Chair called the meeting to order at 10:32

661. APOLOGIES FOR ABSENCE

Apologies were received from Head of Internal Audit (HIA), Cumbria Shared Internal Audit Service, Cumbria County Council (Richard McGahon) and Audit Manager (AM), Cumbria Shared Internal Audit Service, Cumbria County Council (Emma Toyne) – no relevant agenda items.

662. URGENT BUSINESS AND EXCLUSION OF PRESS AND PUBLIC

There were no items of urgent business or exclusions of the press and public to be considered by the committee.

663. DISCLOSURE OF PERSONAL INTERESTS

The Chair declared a personal interest as having continued in her role as Chair of the North West Regional Police Pensions Board.

There were no other declarations of interest.

664. MINUTES OF MEETING AND MATTERS ARISING

The committee received and reviewed the minutes of the meeting held 23rd June 2021.

Points of accuracy

- Part 1, Page 7, Item 653, Paragraph 2 should read - 'A member asked about the value of the consultancy work, as the committee has not had any feedback on a consultancy work and its value for the organisation, and whether there were plans to continue to use the consultancy in the future.'
- Part 1, Page 8 Item 655 – Reflective Practices Review Report, Paragraph 1 should read – 'Recommendation had been made to use a month reference rather than seasonal reference within the report, to allow for more precise monitoring, and assessment of the progress by the JAC members. The JCFO assured it would be changed.'
- Part 2, Page 1 – Items considered not in the presence of the press and public should read - 'The committee considered the annual governance statements and the annual statement of accounts as part 2 of the agenda in accordance with s100A(4) Part 1 of Schedule A of the Local Government Act 1972 on the grounds that the discussions contained some sensitive information regarding outstanding legal cases'.

Members were asked if they would like an update on any of the actions from the minutes, however, it was noted that the full action sheet would be reviewed at the meeting on the 17th November 2021, so discussions were pended until that meeting.

RESOLVED, subject to the amendments above, that the minutes be recorded as a true record of the meeting held on 23rd June 2021.

665. ACTION SHEET

To allow the focus of the meeting to be on the Statutory Statement of Accounts and Audit, it is proposed that the review of the action sheet be deferred to the meeting on 17 November 2021.

ACTION, deferred to the Joint Audit Committee meeting on the 17th November 2021

666. AUDIT FINDINGS REPORT

The Chair opened discussions by informing the Committee that members had been briefed on the report by the Engagement Lead (EL) from Grant Thornton at the earlier private meeting. The Chair reported to the Committee that there were no supplementary issues raised that were not contained within the report.

The EL introduced the report by firstly placing on record his thanks for providing a good quality set of financial statements with minimal changes and only minor disclosure issues. The EL confirmed it had been a very positive engagement and was pleased to be able to provide the assurance over the accounts and to be able to provide an unqualified opinion on the financial statements.

In respect of the Statement of Accounts, the audit is complete subject to a post balance sheet events review and receipt of signed accounts and the letters of representation which will be signed following this meeting.

The opinion will include an emphasis of matter paragraph as it did last year which relates to ongoing uncertainty over the valuation of non-specialist assets. This is the view of the commissioned independent external professional valuer, this is not a qualification, but it is something that the reader of the accounts should be drawn to in understanding the valuations. Valuations are identified as an area of significant risk and the EL confirmed they had performed substantive and robust procedures as it is underpinned by estimates and judgements. EL confirmed that they have not found any issues and were pleased that management have worked with the valuer and estates team and improved upon matters raised in last year's audit findings.

Value for money conclusion – There has been a three-month extension (across all Government bodies) to allow for the substantial increase in work arising from the new code of audit practice requirements and the requirement to produce a detailed summary report rather than the previous exception-based report. As a result, the audit certificate will not be issued alongside the audit opinion as in previous years

Significant risk – areas considered were management override of controls, valuation of the net pension fund liability and valuation of property assets (as mentioned earlier). Extensive procedures were performed to assess those risks and there are no findings to report that would impact the financial statement's opinion.

EL brought to the attention of the committee the net pension fund of the PCC and CC as the largest figure on the balance sheet and at risk of misstatement because of estimation and judgments which are used to derive that number.

- It was identified in LGPS pension scheme audit that the actuary had used an estimated figure for some of the assets which the pension fund auditor identified as an understatement. The share of which for Cumbria was £1.123m, this was identified late in the audit, was out of management control and is no reflection on the processes at Cumbria Police. It was deemed as not material and has no impact on useable reserves. The EL confirmed he was comfortable with management's decision to leave

this as an unadjusted misstatement as it does not impact on accounts, but it will be included in the letter of representation.

The second unadjusted misstatement brought to the attention of the committee is in relation to prepayments.

- During testing £652k of creditor prepayments were found to have been processed where the expenditure had not actually been prepaid. The impact on the balance sheet is nil overall as there are corresponding debtor and creditor entries. Management have made the decision not to alter the misstatement and the EL confirmed that he is comfortable with this approach, but it will be included in the letter of representation.

Other Findings

General ledger system audit – Segregation of duties / access levels that could lead to inappropriate entries being made and going undetected. The EL confirmed that they had performed journal sampling for those users and found that no journal entered was erroneous or inappropriate and that there has been no overriding of journal controls by superusers. Management have put in place a process of authorisation of any journal line over £50k to minimise the risk. Recommendations have been made for improvements and management will be speaking to the IT audit team to discuss changes. The EL suggested that this might be an area for the committee to consider for further action

Audit fees remain as proposed in the audit plan. Some additional funding has been made available from the government to offset fee increases and Cumbria should receive £18k. Cumbria will also receive a share of the £5m distribution from PSAA which should result in the offset of the full fee increase.

No further questions asked of the EL.

The Chair confirmed that the matter of general ledger segregation of duties / administrative access controls had been discussed at the earlier private meeting with Grant Thornton. Members have recommended that this matter be considered within the internal audit plan to provide additional assurance and that Internal audit should not be part of the control system but independently look at how it is working.

The PCC agreed to this sensible approach to the recommendation. Valuation of assets is timely as Local Government Reform throws up interesting opportunities for the Constabulary and it is the right time for us to look at how we deploy police resources. Accurate valuations of what we have today will help us plan for the future.

The CC agreed that it was a really good suggestion and the planned development session with the new internal audit provider (planned for 17/11/21) will allow further discussion to give some firm parameters to internal audit.

In summary, the Chair said that the Audit Findings Report was very strong report that reflected well on the Constabulary and PCC and in particular on the financial controls that are

in place and standards of the accounts that have been prepared. There were some non-material adjustments these were largely outside of the management control but overall, very pleased with the report and thanks again to everyone who worked so hard to get to this point.

A member asked for clarity from the EL on Appendix D – Audit Fees. The EL confirmed that this was the final fee to be charged but the increase identified earlier in the year was still subject to formal approval by PSAA and until that was complete the final invoice could not be issued.

RESOLVED, Report received.

667. ASSURANCE FRAMEWORK STATEMENT OF ACCOUNTS

The JCFO presented the Assurance Framework Statement of Accounts. The report covers scrutiny on the final accounts, included in the report is the Head on Internal Audits opinion, the CFO's opinion on effectiveness of audit, the External Audit opinion, Annual Governance Statements and letters of representation and this all links into the valuable work done by the committee contributing to the overall assurance.

Statutory deadlines have been extended for this year and next year and in general it is quite an achievement to get to this point at this stage of the year. A credit to all involved and especially given the delays arising from remote working making it more difficult to prepare and audit the accounts many local authorities are not in a similar position.

There have been no technical changes and those changes around lease accounting have been delayed in recognition of the extra work involved in producing and auditing the accounts.

The JCFO also passed on his thanks to the External Audit team for all their hard work and the professional work of the Finance Team.

No questions were asked of the JCFO

RESOLVED, all other items were resolved.

668. ANNUAL STATEMENT OF ACCOUNTS

The chair opened the floor to members for questions:

Capital Underspend – significant underspend reported which is an understandable situation, but can you assure us that as we are carrying it over to the new year, we now have the capacity to deliver, in terms of staffing and supply chains, and given the added pressure of operation uplift what steps are being taken to address this.

The CC confirmed that the Constabulary was watching this issue closely and that both Brexit and Covid had played their parts in disrupting the supply chain. The vehicle replacements are

virtually back on track. Through gold groups and operations board, we paid particular attention to the effect on operational policing and apart from running an older fleet for a while there was little effect.

The PCC reiterated the challenge of reporting an underspend and then requesting a council tax increase, but it needs to be clear that this is not an underspend as such it is committed expenditure that has been delayed,

Question from a member on the delayed capital expenditure – would it be possible to commit those funds upfront, appreciating that there are plans in place but do not want to spend it for the sake of it but there are operational things on the horizon.

The JCFO confirmed that we could only account for items when goods and services are physically received and that we were looking to be agile in our management of the capital programme. The reports to PAC do show some slippage particularly in ICT where we are taking our time and looking for innovative ways so rather than committing ourselves to a certain path, we are taking our time to invest in the right technology.

A member asked for an update on the actions contained on the improvement plans within the AGS. It was confirmed that a six-monthly update will be given at the next meeting (17/11/21).

The Chair recommended that from everything that has been seen by committee over the previous 12 months relating to the accounts, the overall governance arrangements, the AGS and the Statement of Accounts should be signed by both the PCC and the CC and that they represent a fair and fulsome summary of the financial position and the governance arrangements and that the Constabulary and the OPCC. The Chair thanked again all those involved as it is clearly a very high standard of work.

RESOLVED, all other items were resolved. the chair confirmed that in the committee's opinion that the accounts can be signed.

669. POINT FOR CONSIDERATION BY THE COMMISSIONER AND THE CHIEF CONSTABLE

Considering the inclusion general ledger segregation of duties / administrative access controls in the internal audit plan – as discussed earlier.

Any Other Business

Public Sector Audit Appointments – A discussion took place around the benefits and disadvantages of contracting again with PSAA or tendering on our own for external audit provision. The JCFO recommended that we continue using PSAA and although it is not for the Committee to make the decision on engagement of external audit the Chair agreed that the benefits of PSAA outweighed the negatives and agreed with the recommendation

In closing the meeting, the Chair said that it had been an honor and privilege to have been a committee member for 9 years and was very proud of policing in Cumbria. The Chair thanked everyone involved, stating that JAC receives outstanding professional support and great respect from the OPCC and the Constabulary, which is not afforded to all audit committees.

The PCC, CC and all the members thanked the Chair for her professional, pragmatic, supportive and rightly challenging approach that has driven the organisation forward and improved the effectiveness of Cumbria police.

Meeting ended at 11:32

Future JAC Meeting Dates (For Information)

17th November 2021 @ 10.30am – Microsoft Teams

16th March 2022 @ 10.30am – Conference Room 2/Microsoft Teams

22nd June 2022 @ 10.30am – Conference Room 2/Microsoft Teams

21st September 2022 @ 10.30am – Conference Room 2/Microsoft Teams

23rd November 2022 @ 10.30am – Conference Room 2/Microsoft Teams

22nd March 2023 @ 10.30am – Conference Room 2/Microsoft Teams

Future Police & Crime Panel Meeting Dates (For Information)

25 January 2022 – Conference Room A/B, Cumbria House, Botchergate, Carlisle, CA1 1RD

5 April 2022 – Venue TBC

19 July 2022 – Venue TBC

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Joint Audit Committee – Action Update and Plan

Minute Item and date of Meeting	Action to be taken	Person Responsible	Target Date	Comments	Status
540(e) (20/11/19)	Constabulary Arrangements for Anti-fraud & Corruption /Whistleblowing	DCI PSD JCFO	Nov 2020 Mar 2021 Moved to Sep 2021	<p>To check and update definition of Fraud and Corruption on page 7 if appropriate.</p> <p>September 2020 – There has been a lot of work done on the new policy and procedures around this subject. However, there is still some work to do on these, not least because of the implementation of the Police Conduct and Police Complaints and Misconduct Regulations 2020, which has seen some significant changes to our working procedures.</p> <p>A plan has been developed with the aim of completing this work by November 2020.</p> <p>November 2020 – This work is still ongoing.</p> <p>March 2021 – Deferred to September 2021 meeting.</p> <p>June 2021 – The JCFO to cross reference the Constabulary arrangements with the Annual Governance Statement 2021 – if they need amending.</p> <p>October 2021 – The Constabulary updated arrangements for anti-fraud and corruption are included as substantive agenda items.</p>	Completed
597 (24/09/20)	Monitoring of Audit	DCFO, JCFO and CE	Nov 2020 Mar 2021 Moved to Sep 2021	<p>To look at more options around using MS Teams for the Action Plan and the Monitoring of Key Audit Recommendations through the MS Team Planner while also providing an overview for committee.</p> <p>November 2020 – Due to time constraints around the meeting dates and the team focusing on the implementation of the new finance system it is requested that the deadline for this action be moved back to the March meeting. In the meantime, work will be undertaken to trial the use of MS Teams Planner to record actions and subsequent updates.</p> <p>March 2021 – This development work has not yet been completed, Deferred to July 2021 meeting.</p> <p>June 2021 – There is an interdependency about how future meetings will be conducted and how the technological needs of members will be fulfilled. As members faced technological issues whilst joining a meeting from outside of the Constabulary, hybrid option had been suggested from September 2021, if complies with the legislation.</p> <p>The JCFO and CE to discuss hybrid JAC meetings with Collaborative Board.</p>	Completed

				<p>October 2021 – Discussions will take place as part of the development session following this meeting. The decision was taken that the November meetings should be MS Teams based.</p>	
617 (19/11/20)	Commercial Annual Report	Head of Commercial	Nov 2021	<p>To update the slide to show cashable savings as a percentage of total spend against other forces</p> <p>March 2021 – Will be included in the version of the Procurement Annual Report to be presented to JAC in November 2021.</p> <p>October 2021 – The Commercial Annual reports is included as substantive agenda items.</p>	Completed
641 (23/06/21)	Point for Consideration – Internal Audit Plan	CE & JCFO	Sep 2021	<p>The committee raised a concern that they have not been involved in buildup of the Internal Audit Plan, ask for a development session, discussion or a more detailed reports, as to how the plan is formulated. CE & JCFO to raise this matter at the Collaborative Board.</p> <p>It was acknowledged that a draft of the internal audit plan will be brought to March 2022 meeting, for a review by the committee. The Committee however, requested earlier insight and input to internal audit plan and schedule this action into timetable.</p> <p>October 2021 – An audit planning timetable is being developed with the new internal audit provider TIAA. The request from JAC to be more involved in the planning process has been noted. The committee will be introduced to TIAA as part of the development session following this meeting and the discussions around audit planning can take place.</p>	Completed
648 (23/06/21)	External Audit Fees	JCFO	Sep 2021	<p>The JCFO to check the MHCLG decision on additional funding for external audit fees, post recent consultation, and update the OPCC office and members.</p> <p>October 2021 – Additional funding of £18k has been confirmed by MHCLG which will partially offset the additional charges from GT currently estimated at £22k. GT also indicated at the 04/11/21 JAC meeting that a rebate from PSAA would also be forthcoming which would negate the increase.</p>	Completed
649 (23/06/21)	Value for Money	DCFO & JCFO	Sep 2021	<p>The committee requested Value for Money report to be scheduled into a development session for future meetings.</p> <p>October 2021 – This will be picked up as part of the 16 March 2022 JAC development session.</p>	Completed

651 (23/06/21)	Anti-fraud and Corruption Activities	CE	Sep 2021	<p>The CE to implement a change in the policy to state clearly the JAC panel involvement in the process. The JAC panel to be appropriately sighted on any issues around fraud and corruption, and this recognised in the report.</p> <p>October 2021 – This will be picked up in the cyclical review of Governance documents at the meeting on 17 November.</p>	Completed
653 Action No 1 (23/06/21)	Internal Audit – Annual Report	JCFO	Sep 2021	<p>The JCFO to discuss as substantial item with Collaborative Board and provide members with the feedback on the effectiveness and value of the consultancy work.</p> <p>October 2021 – A verbal update will be provided at the meeting on 17 November.</p>	Completed
653 Action No 2 (23/06/21)	Internal Audit – Annual Report	JCFO	Sep 2021	<p>The JCFO to discuss with Collaborative Board, agreement and schedule of the internal audit plan for the 2021/22, to ensure that audit delivery would be on track for the current financial year.</p> <p>October 2021 - A verbal update will be provided at the meeting on 17 November.</p>	Completed
655 (23/06/21)	Internal Audit Reports – Reflective Practice Review Report	JCFO	Sep 2021	<p>The JCFO update dates in report monitoring sheets (management actions) and consult the Head of the PSD on possibility of collaborative working of the department with other partners.</p> <p>October 2021 – A verbal update will be provided at the meeting on 17 November.</p>	Completed
657 (23/06/21)	Annual Statements of Accounts	DCFO	Sep 2021	<p>The DCFO to clarify members allowances table in the Statutory Statement of Accounts for both PCC/Group and CC.</p> <p>June 2021 – The members allowances table in both sets of the SoA has been enhanced to show a sub analysis of the annual cost by committee/group. the wording below the table has also been updated to reflect the inclusion of misconduct panel expenses in the note. This change was made before the Draft SoA was issued for audit and published on the website.</p>	Completed
659 (23/06/21)	Financial Management Code	DCFO	March 2022	<p>The DCFO to provide an update on progress on all actions from this report and record this in the JAC action sheet. Members were asked to note the progress made and its implementation.</p> <p>October 2021 – An update will be provided as part of the March 2022 JAC meeting.</p>	Not Yet Due

Joint Audit Committee – Review of Effectiveness Action Plan 2021/22

Ref	Improvement Area	Planned Action	Owner	Review Date	Status
JAC1	Support and monitor the OPCC and Constabulary plans to address the ongoing funding environment.	<p>Members to maintain awareness of the national position in relation to the Funding Formula; to receive annual training on the budget and MTFP and consider as appropriate the arrangements flowing from significant changes in funding levels.</p> <p>JAC members to consider efficiency aspects of any recommendations or reports to Committee.</p>	JAC	March 2022	JAC1
JAC2	Support and challenge any new governance arrangements, for example, from restructuring and capacity reviews including Operation Uplift; greater collaboration with other organisations; joint working on delivery of services, such as Local Focus Hubs or external factors such as COVID19.	JAC to encourage clarity in any new arrangements; appropriate documentation including in Financial Regulations and ensure governance arrangements considered as part of the risk assessment.	JAC	March 2022	JAC2
JAC3	Consider the impact of new or emerging developments, including COVID19 on internal and external audit work programmes to ensure that they remain relevant.	<p>Members to continue maintain awareness of issues through corporate updates and wider reading and seek to understand how this impact on governance arrangements.</p> <p>JAC to consider on an ongoing basis how the work of the Committee and the internal and external audit work programmes remain relevant.</p>	JAC	March 2022	JAC3

Joint Audit Committee



Peter McCall

Title: OPCC Risk Management Monitoring

Date: November 2021

Agenda Item No: 7a

Originating Officer: Joanne Head, OPCC Governance Manager

CC:

Executive Summary:

The Office of the Police and Crime Commissioner (OPCC) is responsible for providing policing services within Cumbria. This takes place in a constantly changing and challenging environment and the OPCC must ensure that it has robust systems and processes in place to monitor and react appropriately to risk.

Recommendation:

That, the committee notes the changes regarding the OPCC's strategic risk register, the oversight undertaken of the Constabulary's risk management; and the front sheet of the OPCC's operational risk register.

1. Introduction & Background

1.1 The Office of the Police and Crime Commissioner (OPCC) is responsible for providing policing services within Cumbria. To enable it to carry out this function effectively it must monitor and react appropriately to risks. The Joint Audit Committee as part of their role, ensures that the OPCC is actively managing strategic risks and one member of the committee has been appointed as the lead member for risk.

2. Issues for Consideration

Strategic Risk Register

2.1 Appended to this report at Appendix 1 is the OPCC's strategic risk register, which has been reviewed and updated since the last meeting of the Committee. There are two identified risks, these being:

- R1 - Strategic Finance
- R2 - The Emergency Services Mobile Communications Programme
- R3 - Insurance

2.2 The scoring for R1 remains at 9. The 2021/22 grant settlement was more favourable than expected providing appropriate funding for additional officers recruited as part of

Operation Uplift; and the continued flexibility to raise council tax. Current forecasts indicate expenditure for 2021/22 is broadly on budget which will assist future budgets.

- 2.3 R2 score remains at 12 following review as there is continued uncertainty on final costs. Firmer indications are that the project will go ahead, is picking up pace and will progress. However cost and operational risk are continuing to increase.
- 2.4 Previously on the register was risk, R3 Commissioning Services has been removed from the strategic risk register due to its overall scoring being reduced. This risk related to the future funding of SARC services and obtaining providers with the ability to fulfil the provision of services. Following discussions with NHSE&I and increased funding a service provider has been identified and appointed.
- 2.5 A new risk has been escalated from the operational register to the strategic risk register, this being R6 – Insurance. Recent insurance renewals have raised concerns that Cyber insurance may be difficult to procure in future. This has been awarded a total score of 8 and therefore been escalated. Negotiations are on-going, and the risk will be monitored.

Operational Risk Register

- 2.6 The OPCC has also reviewed its operational risk register, rationalising it to reflect the operational risks it faces. A review of the operational risk register is carried out on a quarterly basis with all staff being required to review their own risks and make any necessary changes and updates. The OPCC Executive Team consider both the strategic and operational risk registers every quarter as part of their meetings. A copy of the front sheet is attached at [Appendix 2](#). This illustrates whether the scores for the individual risks have risen, remained the same or decreased and assists the Committee to understand how the risks are managed.
- 2.7 A number of low scoring operational risks remain on the register, these being Risks 3 Financial Governance, Risk 4 Shared Services, and Risk 5 Asset management. They remain to show illustrated monitoring of these areas of business which are important to the OPCC's overall Governance regime.
- 2.8 Risk No 10 – it is proposed to remove this from the OPCC operational risk register. Procedures and practices are now well embedded within the OPCC having become 'day business' for over 3 years. The Constabulary, who the OPCC is interdependent upon for some areas of business, have now also moved this element of work to day business. The OPCC has not identified any operational or strategic risks in relation to GDPR, however should this change in the future it would be placed on the register again.
- 2.9 Risk No 13 in relation to the OPCC's response to the COVID 19 pandemic has been updated from the risks initially identified in March 2020. Since that time the OPCC has been able to adjust to different ways of working and continue with all of its business functions. The vaccination programme and agile working has resulted in staff being able to combine working in the suite of offices and at home without any disruption to services. Since September 2021 the Commissioner and OPCC have gradually started to attend face to face events whilst utilising the advantages of technology to hold meetings throughout the

county. The OPCC's Business Continuity Plan would be invoked should a number of staff become ill at any one time.

- 2.10 The OPCC Chief Executive met with the Constabulary's Lead for Risk Management on 21 October 2021. This was as part of the OPCC's quarterly oversight of the Constabulary's strategic risks.
- 2.11 Discussions took place in relation to the two separate risk registers, the risks identified therein and any risks that may impact upon the other organisation which may need to be recorded within the relevant strategic risk register if it does not already appear. Both the OPCC and Constabulary's strategic risk registers retained risks in relation to Strategic Finance and ESMCP with appropriate scoring. The Constabulary will report further on their strategic risk register at the meeting.

3. Implications

- 3.1 Financial - the inability of the OPCC to successfully identify and manage its organisational and strategic risks could impact financially on not only the OPCC but Cumbria Constabulary and other partner organisations which are financially dependent.
- 3.2 Legal - the OPCC could face legal challenge on some areas of its business, therefore it is essential that these are identified at an early stage and effectively mitigated and managed.
- 3.3 Risk - if the OPCC does not identify and mitigate risks then it may mean that the OPCC cannot carry out its statutory function efficiently and effectively.

4. Appendices

Appendix 1 – OPCC Strategic Risk Register

Appendix 2 - OPCC Operational Risk Register (front cover only)

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	Impact	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 Owner		Actions		Reviews	
Risk No.	Risk Title	Total Score	Risk Owner	Action Owner	Any outstanding actions YES/NO	Actions to be completed	Date of next review
R1	Strategic Finance	9 ↔	Chief Executive	Joint Chief Finance Officer	No	Continued review of the MTFF as part of the budgeting process. Further development and refinement of savings options in conjunction with the Constabulary.	February 2022
R2	The Emergency Services Mobile Communications Programme (ESMCP)	12 ↔	Chief Executive	Chief Executive / Constabulary Lead Officer	No	Continue to monitor the national position and take appropriate actions to prepare for implementation.	February 2022
R3	Insurances	8 ↑	Chief Executive	Chief Finance Officer	Yes	Negotiations are on-going in relation to Cyber insurance procurement in the future.	February 2022

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	<p>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. Real term 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.</p> <p>Police & Crime Plan Objectives - 1 Your Priorities for Cumbria / 2 A Visible and Effective Police Presence / 3 Tackle Crime and Anti-Social Behaviour/ 4 Ensure Offenders Face a Consequence for their Crime / 5 Always Put Victims First / 6 Focus on Police on Online and Sexual Crime / 7 Spend Your Money Wisely / 8 Supporting Young People</p>
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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	Impact	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				Action Owner(s)	Review Date
		Impact	Likelihood	Risk Score	Impact	Likelihood	Risk Score		Current Controls in Place to Mitigate the Risk	Assurances	Future or further actions to be taken			
Reduction in real term resources within the medium term time horizon to provide sufficient funding for the Commissioner and Constabulary to deliver current levels of policing service. Current government funding protection is only provided in cash terms, requiring the Commissioner to meet inflation and other service pressures from increased precept or savings. This risk may be impacted as a result of the announcement that the Home Office intends to undertake a review of the Police Funding Formula for implementation in 2023/24, but as the make-up of the formula are unknown at this stage the risk score has not been amended.	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	3	9	Chief Executive (Reduce)	The budget and medium term financial forecast (MTFF) are reviewed and updated on a regular basis. The budget has been balanced in the short term and reserves provide additional security. Both the 2020/21 and 2021/22 grant settlements were more favourable than expected providing appropriate funding for additional officers recruited as part of Operation Uplift and continued flexibility to raise council tax. However, this does not fully alleviate the longer-term concerns regarding the sustainability	Budget monitoring processes and internal controls are in place to manage financial commitments. 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. The most recent audit review of preparedness for funding cuts provided reasonable assurance.	Continued review of the MTFF as part of the budgeting process. Further development and refinement of savings options in conjunction with the Constabulary.	Chief Finance Officer	Feb 2022	

									<p>of Government funding. On balance the short-term risk has been reduced, which is reflected in the risk score. Scenario planning to identify potential longer-term savings and service re-engineering is on-going in both the OPCC and Constabulary. The Commissioner has joined the National Rural Crime Network to support rural policing issues.</p>				
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Risk No: R2	Risk Title: Emergency Services Mobile Communications Programme	The Emergency Services Network is a major national project to replace the current Airwave radio communications system across all emergency services with Mobile Phone technology. There are national and local risks in relation to uncertainty over the cost and timing of implementation of the new system. Cumbria also specific risks in relation to the coverage due to the topography of the county. Police & Crime Objectives: 1 – Your Priorities in Cumbria / 2 -A visible and Effective Police Presence
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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

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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				Review Date
		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)	
The Emergency Services Mobile Communications Programme (ESMCP) is a collaboration between the police, fire and ambulance Emergency Services (3ES) in England, Scotland and Wales to replace the existing mobile radio system known as Airwave. ESCMP will deliver the Emergency Services Network (ESN) which will provide integrated critical voice and broadband data over an enhanced 4G commercial network. This is a significant project. At the present time there are concerns around cost, coverage and timescales for delivery, which has been subject to a series of delays. Recent cost updates have indicated that forces will have to meet an increased share of the cost, hence an increase in the risk score.	This risk may result in significant additional costs and coverage issues may impact upon the Commissioner's ability to ensure Cumbria has an efficient and effective policing service, which could lead to reputational risk.	4	3	12	4	3	12	Chief Executive (Reduce)	The Commissioner is working regionally with other North West Commissioners and nationally through the APCC to highlight concerns. The Chief Constable is a member of the national reference group and Cumbria has seconded a staff member to the regional implementation team. Appropriate staffing resources have been identified within the ICT team to deliver the project and prudent estimates of costs have been included in the capital programme and medium-term financial forecast.	Work being undertaken regionally and nationally provides some assurance. The critical nature of this national project and delays in national implementation mean it will be a significant risk for a protracted time period.	Continue to monitor the national position and take appropriate actions to prepare for implementation. Update Nov 2021 Continued uncertainty on final costs. Firmer indications are that the project will go ahead, is picking up pace and will progress. However cost and operational risk are continuing to increase.	Chief Executive	Feb 2022

Risk Number: R3 (Op 06)	Risk Title: Insurances	The Commissioner and Chief Constable take out insurance to transfer the financial risks in respect of a range of liabilities/risks including public and employee liability, assets, investment fraud. Police & Crime Plan Objectives - 7 Spend Your Money Wisely
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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	Impact	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)	Current Controls in Place to Mitigate the Risk	Assurances	Future or further actions to be taken	Action Owner(s)	Review Date
		Impact	Likelihood	Risk Score	Impact	Likelihood	Risk Score						
Failure to adequately insure the organisation against all of the risks that it faces and/or failure to procure sufficient insurance cover/failure of the insurance provider	Potential significant financial implications should either the insurer fail commercially or the insurance cover taken fall short of the full liability incurred	4	2	8	4	1 2	4 8	Chief Executive Reduce/Accept	An insurance broker is procured to provide specialist advice on the level of cover. Broker advice includes a rating for the financial stability of the insurance provider. Deputy CFO provides detailed insurance schedules to ensure broker and insurers have a full understanding of the business and risks. Business managers in specialist areas are asked to advise on options regarding additional/bespoke insurance policies. Annual report from the Director of Legal in respect of significant public and employee liability claims.	Bi-annual external actuarial review of levels of insurance liability against existing provision and reserves. Decisions on level of cover and whether to self-insure are taken for review to the Executive Board and determined by the Commissioner and Chief Constable providing further scrutiny. Recent insurance renewals have raised concerns that Cyber insurance may be difficult to procure in future. Negotiations are on-going.		Chief Finance Officer	Feb 2022

OFFICE OF THE POLICE & CRIME COMMISSIONER – OPERATIONAL 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	Impact	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

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

			Risk Owner		Actions		Reviews
Risk No.	Risk Title	Total Score (direction of travel)	Risk Owner	Action Owner	Any outstanding actions YES/NO	Actions and dates to be completed	Date of review
FINANCE							
01	Budget Management	6 ↔	Joint Chief Finance Officer	Deputy CFO	No	Current forecasts indicate expenditure for 2021/22 is broadly on budget.	Apr 2022
02	Investment Counterparty Risk	3 ↔	Joint Chief Finance Officer	Deputy CFO	No	None	Apr 2022
03	Financial Governance	2 ↔	Joint Chief Finance Officer	Deputy CFO	No	None	Apr 2022
04	Shared Services	2 ↔	Chief Executive	Deputy Chief Executive	No	Governance agreements will be reviewed on an on-going basis.	Apr 2022
05	Asset Management	2 ↔	Chief Executive	Chief Finance Officer	No	None	May 2022
06	Insurance	8 ↑	Chief Executive	Chief Finance Officer	No	None	February 2022
PARTNERSHIPS & COMMISSIONING							
07	This risk has been removed						
08	Partnerships & Collaboration	4 6 ↑	Chief Executive	Partnerships and Strategy Manager	Yes	Work with partners through the Safer Cumbria Commissioning Group to review the Bridgeway budget.	February 2022
09	Commissioning of Services	9 6 ↓	Chief Executive	Partnerships and Strategy Manager	Yes	Staffing issues have been raised with the Constabulary to support staff and ensure delivery of Keep Safe to all victims of crime.	April 2022
COMMUNICATION AND BUSINESS SERVICES							
10	Information Management (GDPR)	6 3 ↓	Chief Executive	Governance Manager	No	Recommendation that this risk is removed.	
12	This risk has been removed						
13	OPCC Business Disruption	9 6 ↓	Chief Executive	Governance Manager	No		April 2022

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Joint Audit Committee

TITLE OF REPORT: Constabulary Risk Management Update

DATE OF MEETING: 17th November 2021

ORIGINATING OFFICER: Strategic Development, Insight and Performance

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

Executive Summary:

The purpose of this paper is to provide the Joint Audit Committee with an update on the Constabulary's risk management arrangements, including a review of the current strategic risk register.

As part of this process, Strategic Development carried out a quality assurance check of all departmental and operational risk registers, to ensure that risk is effectively managed across the organisation. The Strategic Risk Register was reviewed by COG on 30th August 2021.

At this meeting it was agreed that:

- Risk 47 – capacity and capability of the analytical resource– to be added to the Strategic Risk Register.

Recommendations:

That the Joint Audit Committee:

Note the Constabulary's current strategic risks, and that a review of all risk registers was completed in accordance with the Risk Management Policy in June/August 2021.

MAIN SECTION

1. Introduction and Background

1.1 Strategic Risks

Risk is the threat that an event or action will affect the Constabulary's ability to achieve its organisational aim and objectives.

Each risk is managed at the level where the control to manage the risk resides. Strategic risks are managed by the Chief Officer Group, significant operational risks are managed by the Operations Board and significant strategic business risks are managed in the relevant directorate or by nominated senior managers. Projects and programmes also have their own risks that are managed by the project / programme teams.

Strategic risks are those affecting the medium to long term objectives of the Constabulary and are the key, high level and most critical risks that the Constabulary faces. Best practice indicates that the number should be between 5 and 10. Currently the Constabulary has 8 strategic risks.

The Constabulary's mission is to deliver an outstanding police service to Keep Cumbria Safe. The Constabulary's overarching purpose is:

1. Tackling criminality
2. Helping those in need
3. Connecting with communities

The strategic risks identified by the Constabulary are concerned with:

1. The implications of longer-term reductions in budget and the level of savings required.
2. Significant additional and unbudgeted capital and revenue expenditure which may be incurred due to delays in ESMCP transition.
3. Capacity and capability of the analytical function - NEW
4. Covid-19
5. Uncertainty over cost and coverage of the Emergency Service Mobile Communications Programme.
6. Crime Command Resilience
7. ICT demand
8. Failure to deliver Cumbria Vision 25 and its associated efficiency plan.

The table on page three outlines the Constabulary's eight strategic risks and provides the RAG rating (Red, Amber, and Green) for each risk (**RAG risk rating = impact x likelihood**). It also indicates which of the Constabulary's core policing objectives the risks link to.

Strategic Risk Register

Risk Ref No	Responsible Officer(s)	Risk Description	Impact	Likelihood	Score before mitigation	Latest Score	Link to Strategic Objectives	Summary of mitigating actions already taken - update
28	Chief Financial Officer / Director of Corporate Support	<p>There may be a detrimental and significant impact on the available budget and a requirement for substantially increased savings, as a result of:</p> <ul style="list-style-type: none"> • a combination of the inflationary pressures on police budgets particularly pay • the lack of provision for inflation in Government grant allocation • proposed changes to police pension contributions • the impact of national projects and initiatives such as ESN and PEQF, and • potential changes to the police funding formula (including the removal of dampening funding) <p>This would result in a compromise to public safety, significant loss of public confidence and serious damage to the Constabulary's reputation.</p>	Very High	Very High	25	16	All	The recent announcement that the Home Office intends to undertake a review of the Police Funding Formula for implementation by 2023/24 increases the likelihood that savings will be required
32	Commander - ICT, Business Development and	The Constabulary may incur significant additional and unbudgeted capital and revenue expenditure caused by a delay in ESMCP transition and consequential extension of reliance on Airwave resulting in the Constabulary	High	High	20	16	All	<p>The Constabulary will shortly receive a further rebate on top of our expenditure for covert replacement.</p> <p>We have now replaced our entire overt and covert handset fleet and have enough left for operation uplift</p>

Risk Ref No	Responsible Officer(s)	Risk Description	Impact	Likelihood	Score before mitigation	Latest Score	Link to Strategic Objectives	Summary of mitigating actions already taken - update
	Information Management	having to extend the life of its airwave infrastructure, and potentially having to pay for both systems for a time.						<p>We are in the process of replacing vehicle sets and when the warranties are extended (await ESN timescales)</p> <p>We have received the updated ESN finance model and it looks good. We will conduct a detailed planning exercise once the FBC is approved in coming months (delayed due to prioritising Airwave rollout)</p>
47	Director of Intelligence	Insufficient capacity and capability of analytical resource to meet demand and key strategic products.	High	Very High	20		All	A structures review is currently underway in order to mitigate the risk.
42	ACC	The Constabulary is unable to maintain business as usual through the high abstraction of staff; procurement constraints, and change in demand profile, caused by the spread of Covid-19 This would result in the Constabulary diverting resources to maintain core functions.	Very High	High	25	15	All	The Covid Internal Gold Group continues to meet in order ensure that all arrangements are in place within the Constabulary. As changes to restrictions and health and safety requirements change, the force is able, through the gold silver and bronze structure, to respond effectively and efficiently.
25	Commander - ICT, Business Development and Information Management	Commitment to the Emergency Services Mobile Communications Programme (ESMCP) and subsequent use of the Emergency Services Network (ESN) has the potential to breach the Constabulary's risk capacity, cost and levels of service provision. This could potentially result in unacceptable levels of service provision; compromise officer safety, increasing costs and loss of	High	Medium	16	12	All	The previously issued elaborated requirements for ESN now fall short of delivery of functionality that is required. Nationally Police leads are reviewing the changes to ensure the product will meet the service acceptance criteria for transitioning to ESN. This risk is still present but being mitigated through project team engagement at a Regional level.

Risk Ref No	Responsible Officer(s)	Risk Description	Impact	Likelihood	Score before mitigation	Latest Score	Link to Strategic Objectives	Summary of mitigating actions already taken - update
		reputation. The duration of impact is likely to exceed 2 years.						
46	Det Supt Crime	Serious Crime within the Constabulary might not be investigated by trained and accredited PIP 2 detectives, caused by an insufficient number, which may result in a poor service to victims, staff welfare concerns, and reputational damage.	High	Medium	12	12		A force Detective Recruitment, Retention and Wellbeing Resilience Plan 2021 has been drafted and a local Detective Recruitment, Retention and Wellbeing Resilience working group has been formed to deliver the actions in the plan which will help to mitigate the risks identified.
44	Digital Board, Commander - ICT, Business Development and Information Management	As the infrastructure, hardware, software and third-party providers underpinning digital, data and technology services becomes ever more complex, the risk in terms of service failure becomes more significant.	High	Low	16	8	All	The project team now in place and will report progress and risk through Digital Board. Scores reviewed and still correct.
2	Director of Corporate Improvement & Director of Corporate Support	The Constabulary may not have the capacity to deliver the Cumbria Vision 25 and its associated Efficiency Plans. If this risk occurs the Constabulary would have to find further savings.	High	Low	10	8	All	New Efficiency plan under development.

Risk Tolerance Levels

Risk Score 1-4 Acceptable. No action is required but continue monitoring.	Risk Score 5-12 Tolerable risks but action is required to avoid a Red status. Investigate to verify and understand underlying causes and consider ways to mitigate or avoid within a specified time period.	Risk Score 15-25 Unacceptable. Urgent attention is required. Investigate and take steps to mitigate or avoid within a specified short term.
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1.2 Drivers for Change

Effective risk management is a key component of effective corporate governance. Managing risk will contribute towards delivery of the strategic priorities. There are potential significant consequences from not managing risk effectively.

Robust risk management will help improve decision-making and drive corporate activity that represents value for money.

Effective risk management will help protect the reputation of the Constabulary and the Office of the Police and Crime Commissioner, safeguard against financial loss and minimise service disruption.

1.3 Consultation processes conducted or which needs to be conducted

Individual risk owners have been consulted as part of the standard risk management arrangements.

1.4 Impact assessments and implications on services delivered

Not applicable- described in the risk register where appropriate.

1.5 Timescales for decision required

Not applicable to this report.

1.6 Internal or external communications required

None.

2. Financial Implications and Comments

Any financial implications are described in the relevant risks outlined within this report.

3. Legal Implications and Comments

Any legal implications are described in the relevant risks outlined within this report.

4. Risk Implications

The Constabulary's risks are described in section one of this report.

5. HR / Equality Implications and Comments

Any HR / Equality implications are described in the relevant risks outlined within this report.

6. ICT Implications and Comments

Any ICT implications are described in the relevant risks outlined within this report.

7. Procurement Implications and Comments

Any procurement implications are described in the relevant risks outlined within this report.

8. Supplementary Information

8.1 List any relevant documents and attach to report

Appendix 1	Risk Scoring Matrix
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8.2 List persons consulted during the preparation of report

- All Departmental risk owners.
- Territorial Policing and Crime Command risk owners.
- Chief Officer Group.

Risk Scoring Matrix

Impact Score	Description					
		IMPACT ON SERVICE PROVISION	FINANCIAL IMPACT	IMPACT ON PEOPLE	DURATION OF IMPACT	IMPACT ON REPUTATION
5	Very High	Unable to function, inability to fulfil obligations	Severe financial loss > £3M	Multiple fatalities	In excess of 2 years	Highly damaging, severe loss of public confidence or being declared a failing Force
4	High	Significant impact on service provision	Major financial loss £1M to £3M	Fatality	Between 1 year - 2 years	National publicity, major loss of confidence or serious IPCC complaint upheld
3	Medium	Service provision is disrupted	Significant financial loss £500k to £1M	Serious injury, RIDDOR reportable	Between six months to 1 year	Some adverse local publicity, legal implications, some loss of confidence
2	Low	Slight impact on service provision	Moderate financial loss £100k to £500k	Slight medical treatment required	2 to 6 months	Some public embarrassment, or more than 1 complaint
1	Very Low	Insignificant impact, no service disruption	Insignificant financial loss < £100k	First Aid treatment only No obvious harm/injury	Minimal - up to 2 months to recover	No interest to the press, internal only

Likelihood Score	Tolerance Levels – Likelihood Assessment	
5	Very High	A risk has a very high score if there is a 90% or more chance of it happening every year. This means that it is almost certain to happen regularly.
4	High	A risk has a high score if there is a 65% to 90% likelihood of it happening at some point over the next 3 years. Basically, it probably will happen but it won't be too often.
3	Medium	A risk has a medium score if the likelihood of it happening is between 20% and 65% over the next 10 years. This means it may happen occasionally.
2	Low	A risk has a low score if the likelihood of it happening is between 5% and 25% at some point in the next 25years. This means it is not expected to happen but it is possible.
1	Very Low	A risk has a very low score if the likelihood of it happening is less than 5% over 100 years. Basically, it could happen but it is most likely that this would never happen.

		Impact	Impact	Impact	Impact	Impact
		Very Low (1)	Low (2)	Medium (3)	High(4)	Very High (5)
Likelihood	Very High (5)	5	10	15	20	25
Likelihood	High (4)	4	8	12	16	20
Likelihood	Medium (3)	3	6	9	12	15
Likelihood	Low (2)	2	4	6	8	10
Likelihood	Very Low(1)	1	2	3	4	5
		Impact	Impact	Impact	Impact	Impact

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CUMBRIA POLICE & CRIME COMMISSIONER AND CUMBRIA CONSTABULARY JOINT AUDIT COMMITTEE

Meeting date: 17 November 2021

From: Audit Manager (Cumbria Shared Internal Audit Service)

INTERNAL AUDIT: PROGRESS REPORT TO 31ST OCTOBER 2021

1.0 EXECUTIVE SUMMARY

1.1 This report provides a review of the work of Internal Audit for the period to 31st October 2021.

1.2 Key points are:

- Work is progressing on the 2021/22 audit plan. Three reviews are complete, and six reviews have commenced. Work scheduled to take place in quarter 3 is either in progress or due to be scoped.
- Some challenges have been experienced in getting work started this year due to availability and engagement of key staff to agree the scope of the work.
- At this stage of the year, it is anticipated that sufficient coverage will be achieved to enable the Head of Internal Audit to deliver the annual opinions.
- The current Shared Service agreement comes to an end on 31st March 2022. An exercise to procure internal audit services for the PCC and Chief Constable, from April 2022, has been undertaken and we were not successful. A new internal audit provider will be in place from April 2022 and we will work towards ensuring a smooth transition. We will work with management to progress and complete the audit plan for 2021/22 to allow us to be able to provide the annual opinions for both organisations.

OVERVIEW

- 1.3 Internal Audit's work is designed to provide assurance to management and Joint Audit Committee members that effective systems of governance, risk management and internal control are in place in support of the delivery of the PCC and Constabulary's priorities.
- 1.4 The Audit Plan aims to deliver a programme of internal audit reviews designed to target the areas of highest risk as identified through the corporate risk registers together with management and Internal Audit's view of key risk areas.
- 1.5 The Accounts and Audit Regulations March 2015 impose certain obligations on the PCC and Chief Constable, including a requirement for a review at least once in a year of the effectiveness of their systems of internal control.
- 1.6 Internal Audit must conform to the Public Sector Internal Audit Standards (PSIAS) which require the preparation by the Head of Internal Audit of an annual opinion on the overall systems of governance, risk management and control. Regular reporting to Joint Audit Committee enables emerging issues to be identified during the year.

2.0 RECOMMENDATION

- 2.1 Joint Audit Committee members are asked to note the report.

3.0 BACKGROUND

- 3.1 The PCC and Chief Constable must make proper provision for internal audit in line with the 1972 Local Government Act. The Accounts and Audit Regulations 2015 require that the PCC and Chief Constable must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account the PSIAS or guidance.
- 3.2 Internal audit is responsible for providing independent assurance to the PCC and Chief Constable and to the Joint Audit Committee on the systems of governance, risk management and internal control.
- 3.3 It is management's responsibility to establish and maintain internal control systems and to ensure that resources are properly applied, risks appropriately managed and that outcomes are achieved. Management is responsible for the system of internal control and should set in place policies and procedures to ensure that controls are operating effectively.

- 3.4 The internal audit plan for 2021/22 was prepared using a risk-based approach and following consultation with senior management to ensure that internal audit coverage is focused on the areas of highest risk to both organisations. The plan has been prepared to allow the production of the annual internal audit opinions as required by the PSIAS.
- 3.5 This report provides an update on the work of internal audit for the period to 31st October 2021. It reports progress on the delivery of the 2021/22 audit plan and includes a summary of the outcomes of audit reviews completed in the period.

Status of internal audit work as at 31st October 2021

- 3.6 The table below shows the number of internal audit reviews completed, in progress and still to be started for the 2021/22 audit. Further detail on this is included at Appendix 2.

Audit Status	Number of reviews
<u>Audits completed:</u>	<u>3</u>
Risk based audits	3
<u>Audits in progress:</u>	<u>6</u>
Risk based audits	3
Financial systems	2
Advisory work	1
<u>Audits to be started</u>	<u>7</u>
Risk based audits	6
Governance work	1
Audits in plan	<u>16</u>

Outcomes from Final Audit Reports to 31st October

- 3.7 Three audits have been completed by 31st October 2021:
- The audits of the OPCC's agile workforce and complaints review process both received substantial assurance.

- The review of the Constabulary's agile workforce received reasonable assurance. At the time of the audit it was noted that there were some controls around agile working that were not as strong as would be expected under normal circumstances. We made no recommendations in the agile workforce report as the issues could either not be remedied as time had passed (e.g. approval and launch of the original Recovery and Renewal governance structure which became business as usual during the audit) or work was already underway on the issues (e.g. a project had been set up to track equipment taken home, work being done by the estates team to establish a new office structure). Other reviews in this year's audit plan will pick up on progress in these areas (e.g. the review of the organisation's response to COVID-19 and the advisory / consultancy piece of work on the use of estates moving forwards). As the Constabulary was clearly aware of, and working on these issues, we concluded that there was limited value in making any recommendations. Had we made recommendations they would have been advisory which are not tracked as part of the monitoring of key audit recommendations process in place as reported to this Committee.

3.8 The detailed outcomes from the finalised audits are shown in Appendix A. Members have received copies of the finalised audit reports for information and consideration and, where members have indicated that they would like to discuss them, reports are included on the Agenda for this meeting.

Draft Reports Issued to 31st October

3.9 There are no reviews at draft report stage at 31st October 2021.

Matters to be brought to the attention of the Joint Audit Committee

3.10 At the Joint Audit Committee meeting in September 2020 it was agreed that we would highlight any matters to be brought to the attention of members in our progress report. We can report that the completed reviews, and work in progress to date, have not identified any issues regarding risk management, governance and internal controls which we need to bring to the attention of the Committee.

Sufficiency of coverage for 2021/22 Annual Opinions

3.11 Work in this year's plan is progressing. However, we have experienced some challenges in getting work started; one review initially identified by management as a quarter 1 piece of work was rescheduled to quarter 3 at management's request but no alternative review was identified to bring forward. All other work scheduled to commence in quarter 1 is complete and work scheduled for quarter 2 is either complete or in progress. Scoping meetings are being progressed for all reviews scheduled to take place in quarter 3, but due to availability and engagement of Constabulary staff to

scope the work quarter 3 reviews are not as far progressed as we had intended.

Shared Service internal audit provision.

3.12 The current shared service agreement ends on 31st March 2022. An exercise to procure internal audit services for the PCC and Chief Constable has been undertaken and we were not successful. We will continue to work with management to progress and complete the 2021/22 audit plan to allow us to provide the annual opinions for both organisations for 2021/22 and to ensure a smooth transition to the new internal audit provider in April 2022.

Emma Toyne
Audit Manager
November 2021

APPENDICES

- Appendix 1 : Final reports issued to 31st October 2021***
- Appendix 2 : Progress on all risk based audits from the 2021/22 plan***
- Appendix 3 : Internal audit performance measures to 31st October 2021***

Contact: Emma Toyne, Audit Manager, Cumbria Shared Internal Audit Service.
emma.toyne@cumbria.gov.uk

Appendix 1 – Final reports issued to 31st October 2021

Assignments	Status	Assessment
Agile workforce (OPCC)	Report circulated to members of the Joint Audit Committee and included in 17th November Committee papers for discussion at the meeting if required. Report available on the Commissioner's website.	Substantial
Agile workforce (Constabulary)	Report presented to Joint Audit Committee at 17 th November 2021 meeting. Report included in Committee papers and available on the Commissioner's website.	Reasonable
Complaint Review Process (OPCC)	Report circulated to members of the Joint Audit Committee for consideration. Report available on the Commissioner's website.	Substantial

Appendix 2 – Progress on 2021/22 Audit Plan

OPCC / Constabulary Review	Audit	Stage	Feedback form returned
Constabulary / OPCC	Financial sustainability		
Constabulary / OPCC	Benefits delivery process	Fieldwork	N/A
Constabulary	New Business Transformation Project (BTP) Establishment processes		
Constabulary	New Business Transformation Project (BTP) finance		
Constabulary	New Business Transformation Project (BTP) Duties Management	Scoping meeting arranged for 24 th November 2021.	
Constabulary	Digital leadership Programme	Initial scoping meeting held on 15 th September. Further scoping meeting organised for 12 th November 2021.	
Constabulary	Agile workforce	Completed	No. Final report issued 11/10/21. Reminder sent 27/10/21.
OPCC	Agile workforce	Completed	Yes
Constabulary	Resource allocation / workforce planning.	Fieldwork	N/A
Constabulary	COVID-19 and the organisation's response to COVID-19	Scoping meeting arranged for 8 th November 2021	
OPCC	Complaint review process	Completed	Yes

Appendix 2 – Progress on 2021/22 Audit Plan

OPCC / Constabulary Review	Audit	Stage	Feedback form returned
Constabulary	Preparedness for the McCloud remedy	Scoping meeting arranged for 3 rd November 2021	
Constabulary	Financial systems – Payroll	Fieldwork	N/A
Constabulary	Financial systems - Inventory	Fieldwork	N/A
Constabulary	Use of Estate moving forward (advisory / consultancy)	Initial scoping meeting took place 15 th September 2021. Awaiting further thoughts from management on the focus of this work.	
Constabulary / OPCC	Risk management and governance		
	Attendance at Police Audit Training & Development event	Virtual event due to take place on 4 th and 5 th November 2021.	
	Internal audit management		

Key: Complete Work in progress Not yet started

Appendix 3 – Internal audit performance measures

Measure	Description	Target	Actual	Explanations for variances / remedial action required
Completion of audit plan	% of audits completed to final report	19% 95% (annual target)	19%	Target is based on the same period last year. Three reports from the 2021/22 audit plan have been completed to date.
Completion of audit plan	Number of planned days delivered * 281 per shared service agreement plus 10 days carried forward for BTP Finance - Phase 2.	79 291* (annual target)	70	Target is based on the same period last year. Days delivered is influenced by the scheduling of work agreed with management. Constabulary management requested that one review identified for Q1 be rescheduled to Q3, but an alternative review was not identified to be brought forward. Further challenges have been experienced in getting Q3 work started. We will continue to work with management to achieve delivery of the 2021/22 audit plan.
Audit scopes agreed	Scoping meeting to be held for every risk based audit and client notification issued prior to commencement of fieldwork.	100%	100%	
Draft reports issued by agreed deadline	Draft reports to be issued in line with agreed deadline or formally approved revised deadline	70%	100%	

Appendix 3 – Internal audit performance measures

Measure	Description	Target	Actual	Explanations for variances / remedial action required
	where issues arise during fieldwork.			
Timeliness of final reports	% of final reports issued for Chief Officer / Director comments within five working days of management response or closeout meeting.	90%	100%	
Recommendations agreed	% of recommendations accepted by management	95%	100%	
Assignment completion	% of individual reviews completed to required standard within target days or prior approval of extension by audit manager.	75%	100%	
Quality assurance checks completed	% of QA checks completed	100%	100%	
Follow up	% of high and medium priority audit recommendations implemented by target date	100%	N/A	There are no follow up reviews in the 2021/22 audit plan.
Customer Feedback	% of customer satisfaction surveys returned	100%	100%	Two forms have been returned.

Appendix 3 – Internal audit performance measures

Measure	Description	Target	Actual	Explanations for variances / remedial action required
Customer Feedback	% of customer satisfaction survey scoring the service as good.	80%	100%	
Chargeable time	% of available auditor time directly chargeable to audit jobs.	80%	80%	



Cumbria Shared Internal Audit Service
Internal Audit report for
Cumbria Office of the Police & Crime Commissioner
Audit of Agile Workforce

Draft Report Issued: 29th July 2021

Final Report Issued: 4th August 2021

Audit Resources

Title	Name	Email	Telephone
Audit Manager	Emma Toyne	emma.toyne@cumbria.gov.uk	07810532759
Lead Auditor	Sarah Fitzpatrick	sarah.fitzpatrick@cumbria.gov.uk	07464522833

Audit Report Distribution

For Action:	Joanne Head (Governance Manager)
For Information:	Gill Shearer (Chief Executive of the OPCC / Head of Communications and Business Services)
Audit Committee:	The Joint Audit Committee which is due to be held on 22nd September 2021 will receive the report.

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

Executive Summary

Background

This report summarises the findings from the audit of **Agile Workforce**. This was a planned audit assignment which was undertaken in accordance with the 2021/22 Audit Plan.

Agile working is important to the Cumbria Office of the Police and Crime Commissioner (OPCC) because it contributes to the efficient use of resources to support delivery of the objectives in the Police and Crime Plan for Cumbria 2016-20 and operational policing needs. The Covid-19 pandemic made it necessary for the team to progress agile working at an unprecedented pace to continue operating and supporting the Police and Crime Commissioner as effectively and efficiently as possible.

The Police and Crime Commissioner has a statutory responsibility for holding the Chief Constable to account. This includes overseeing how resources are used to help keep people safe and ensuring the Constabulary maximises value for money.

This report relates to the arrangements for the OPCC. A separate report has been prepared for the Constabulary's arrangements.

Audit Approach

Audit Objectives and Methodology

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. Detailed findings and recommendations are set out within the Management Action Plan.

Audit Scope and Limitations

The Audit Scope was agreed with management prior to the commencement of this audit review. The Client Sponsor for this review was Joanne Head (Governance Manager). 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: -

- Policy and procedures.
- Health and Safety.
- Employee Wellbeing.
- Security of equipment and data.

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

Assurance Opinion

Each audit review is given an assurance opinion, and this provides Joint Audit Committee and Officers with an independent 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**.

From the areas examined and tested as part of this audit review, we consider the current controls operating around Agile Workforce within the OPCC provide **Substantial Assurance**. The OPCC has successfully used agile working to absorb and adapt to many of the challenges presented by the pandemic which demonstrates resilience and readiness to move forwards beyond Covid-19 restrictions.

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.

Summary of Audit Findings and Recommendations

Controls were operating effectively in the following areas:

- The Executive Team provide clear direction, leadership and oversight of agile working arrangements. There are numerous examples of decisions being communicated to staff in a clear and timely manner, utilising OPCC team meetings (via MS Teams), WhatsApp and emails.
- Arrangements are in place for risks, including those around agile working to be captured, managed, addressed and reported. A risk around business disruption has been removed from the OPCC's strategic risk register due to a lowered score but remains on the

operational risk register for ongoing monitoring and management. The reason provided for the reduced score is that working practices during the pandemic have ensured that the OPCC has been able to fulfil its statutory obligations throughout lockdown.

- The OPCC have adopted the Constabulary's policies, procedures and guidance material relating to agile working. Arrangements are in place for OPCC staff to access them via the Constabulary's intranet and to receive any email updates. Examples include receipt of all Assistant Chief Constable Covid-19 Bulletins during the pandemic and HR updates. Opportunities are also taken to share and reinforce information at OPCC team meetings.
- Managers continue to monitor performance and adherence to policies and procedures, including those relating to agile working on a remote basis. Use is made of virtual one to one sessions, team meetings and strength-based conversations as part of this process and any issues identified are addressed. For example, a number of high flexi time balances were noted during the pandemic and the matter was raised at an OPCC team meeting and in conversation with individual staff. The message relayed from the Chief Executive was to take leave and ensure flexi limits are not exceeded.
- Clear guidance was issued to staff regarding safely attending the workplace during Covid-19 restrictions. Use was also made of WhatsApp to share photographs of the newly set out offices and associated safety equipment to help staff familiarise themselves with the changes made before attending the workplace.
- Staff have undertaken home / agile worker risk assessments for review by Occupational Health Unit Display Screen Equipment (DSE) Assessors. The process ensures that any risks highlighted are reasonably addressed through the provision of advice and in some cases additional / alternative equipment. Staff needs are kept under review by individual managers.
- The OPCC is committed to supporting staff health and wellbeing. This commitment has been clearly demonstrated during the pandemic when staff have been working on agile basis. Efforts have been made to discuss health and wellbeing with staff on a regular basis and emails and bulletins have been shared that include links to an abundance of wellbeing information and further sources of help on the force intranet. Use has also been made of WhatsApp to maintain connections with staff on a less formal basis. A recent presentation to staff stressed the importance of regular contact between managers and their staff, including face to face contact for wellbeing purposes.
- Arrangements are in place to ensure staff are aware of and understand their responsibilities regarding the security of equipment used for agile working and data protection. Arrangements include mandatory training events, force publications and team briefings. The Governance Manager delivered a presentation to the team in June 2021 that covered mobile digital devices, agile working and various security aspects.
- Arrangements are in place to log OPCC equipment taken from offices for use by staff whilst working at home during the pandemic.
- Staff feedback on agile working has been sought to inform Executive Team plans around a potential working model for moving forwards beyond Covid-19 restrictions. The need to ensure that business needs are met whilst considering flexible working for staff has been

clearly communicated. The Covid-19 roadmap was covered at an Extended Team Meeting in June 2021 with subsequent follow up emails in respect of equipment and DSE assessments to progress plans.

There are no audit recommendations arising from this audit review.

Chief Executive of the OPCC / Head of Communications and Business Services Comments

Covid-19 changed the way that we worked overnight and continues to influence. The Office was well prepared and as this report highlights has dealt with the challenges of agile working in a constructive and supportive manner. We have created a safe environment for everyone as well as ensuring that the Office remained fully functional and delivering its objectives bringing in more than a £1million pounds of external funding to support third sector organisations directly supporting vulnerable people.

This has been a good team effort from the OPCC and everyone should be rightly proud. We are well placed to deal with the next challenges.

Appendix A

Audit Assurance Opinions

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

Assurance Level	Definition
Substantial	Sound frameworks of governance, risk management and internal control are in place and are operating effectively. Recommendations, if any, will typically be no greater than advisory.
Reasonable	Frameworks of governance, risk management and internal control are generally sound with some opportunities to further develop the frameworks or compliance with them. Recommendations will typically be no greater than medium priority.
Partial	Weaknesses in the frameworks of governance, risk management and/or internal control have been identified or there are areas of non-compliance with the established control framework which place the achievement of system / service objectives at risk. Recommendations will typically include high and medium priority issues.
Limited	There are significant gaps in the governance, risk management and/or internal control frameworks or there are major lapses in compliance with the control framework that place the achievement of system / service objectives at significant risk. Recommendations will include high priority issues.

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:

Grading	Definition
High	A recommendation to address a significant gap in governance, risk management or internal control frameworks or to address significant non-compliance with controls in place.
Medium	A recommendation to address a gap in governance, risk management or internal control frameworks or to address aspects of non-compliance with controls in place.
Advisory	A recommendation to further strengthen governance, risk management or internal control frameworks or to improve compliance with existing controls.

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Cumbria Shared Internal Audit Service

Internal Audit report for

Cumbria Constabulary

Audit of Agile Workforce

Draft Report Issued: 23rd August 2021

Final Report Issued: 11th October 2021

Audit Resources

Title	Name	Email	Telephone
Audit Manager	Emma Toyne	emma.toyne@cumbria.gov.uk	07810532759
Lead Auditor	Sarah Fitzpatrick	sarah.fitzpatrick@cumbria.gov.uk	07464522833

Audit Report Distribution

For Action:	Jonathan Blackwell (T/Assistant Chief Constable)
For Information:	Mark Webster (Deputy Chief Constable) Stephen Kirkpatrick (Director of Corporate Support)
Audit Committee:	The Joint Audit Committee which is due to be held on 17th November 2021 will receive the report.

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

Executive Summary

Background

This report summarises the findings from the audit of **Agile Workforce**. This was a planned audit assignment which was undertaken in accordance with the 2021/22 Audit Plan.

Agile working is important to Cumbria Constabulary because it contributes to the efficient use of resources to support operational policing needs and the delivery of the objectives in the Police and Crime Plan for Cumbria 2016-20 and Vision 2025.

The Covid-19 pandemic changed the workplace, accelerating the move towards greater agile working and enforcing homeworking on a large scale. This presented many challenges that needed to be overcome but generated significant learning to inform plans for post-Covid working arrangements, including some partial and voluntary homeworking options. The benefits of agile working are well documented and include better work-life balance, reduced travel time, increased productivity, cost savings, greater employee satisfaction and better recruitment and retention.

A separate report has been prepared for the OPCC's arrangements.

Audit Approach

Audit Objectives and Methodology

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. Detailed findings and recommendations are set out within the Management Action Plan.

Audit Scope and Limitations

The Audit Scope was agreed with management prior to the commencement of this audit review. The Client Sponsor for this review was Jonny Blackwell (T/ACC). 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: -

- Employee Wellbeing
- Kit Delivery

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

Assurance Opinion

Each audit review is given an assurance opinion, and this provides Joint Audit Committee and Officers with an independent 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**.

From the areas examined and tested as part of this audit review, we consider the current controls operating around Agile Workforce provide **Reasonable Assurance**.

This opinion recognises the level of controls operating around agile working and the notable strengths, as set out below. The Covid-19 pandemic made it necessary for the Constabulary to progress agile working at an unprecedented pace, and scale, so that they could continue to provide effective policing services to the people of Cumbria. However, the situation meant that some controls operating around agile working were not as strong as would be expected under normal circumstances and this is recognised in our overall assurance.

The original governance structure for Recovery and Renewal (of which agile working is key) was established in May 2020 and a workstack document was prepared for Management Board in August 2020, that included a Covid-19 Renewal and Recovery Plan. The plan was not approved and launched at this time on a formal and cohesive basis because of further Covid-19 response phases, changes in senior leadership and more recently, a new constabulary governance structure. This was not unreasonable given the pandemic and we recognise that the Deputy Chief Constable has had oversight of what was happening. The plan has been progressed separately on a business as usual basis within departments.

During the pandemic staff were able to take equipment home from their offices such as keyboards, mice, monitors and chairs to enable them to continue working, and line managers were tasked with tracking these assets. Oversight of this arrangement has been limited and it is unclear at this stage if records have been maintained fully and up to date.

The current priority is for the Estates team to establish future working arrangements and a new office structure and the ICT requirement will flow from this. The recovery and renewal process can now proceed fully, building on the identified benefits from new ways of working arising from the pandemic.

As the Constabulary are fully aware of the issues highlighted above, some of which can't be addressed, and are working on some of the other areas, we have not included recommendations in this report.

The level of controls operating around agile working and notable strengths are set out below.

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.

Summary of Audit Findings and Recommendations

Controls were operating effectively in the following areas:

- An Agile Working Guidance document prepared in 2018, and approved by senior management at Workforce Board, has been updated in 2021 and made available to staff on the force intranet. The guidance covers employee wellbeing and the issue of standard kit. Supplementary guidance relating to a Home / Agile Worker Assessment Procedure has also been developed.
- Arrangements are in place for risks around agile working to be captured, managed, addressed and reported. A risk relating to agile working currently features on the strategic risk register.
- There was an Agile Working Guidance Launch in 2019 via a 'Need to Know' publication on the Constabulary's intranet and guidance continues to be available to staff on the site. Arrangements are in place for staff to receive any updates, including those from HR. During the pandemic particular use has been made of Assistant Chief Constable (ACC) Covid-19 Bulletins to share information and provide links to relevant pages on the intranet.
- Agile working guidance sets out staff and manager responsibilities and provides clarity around the need for managers to monitor performance and adherence to policies and procedures on a remote basis. This message has been reinforced via HR input into Sergeant

and Inspector Briefing days and an ACC Covid-19 Bulletin. The Digital Leadership Programme delivered to managers across Durham and Cumbria constabularies also covered remote tasking and briefing, wellbeing and performance.

- Covid secure arrangements were promptly put in place at the start of the pandemic for staff to attend HQ, on an appointment basis, to collect kit for home working. Clear instructions were issued to staff regarding safety arrangements as part of the appointment booking process. Kit issue was based on priorities identified by Operation Lectern.
- Managers are tasked with ensuring their staff complete online home / agile worker risk assessments for review by Occupational Health Unit DSE Assessors. The process ensures that any risks highlighted by the assessment are reasonably addressed through the provision of advice and in some cases additional / alternative equipment. Examples include the purchase of an adjustable flat footrest and guidance given regarding an adjustment to monitor height. Senior management maintain oversight of the completion of home / agile worker assessments through the receipt of regular Health and Safety Performance reports.
- Arrangements are in place through the Commercial Team to ensure that additional / specialist equipment is only purchased on the recommendation of the Force Ergonomic Physiotherapist. Recommendations are reasonable and proportionate to address the risks highlighted.
- There is a clear and demonstrable senior management commitment to staff health and wellbeing. There is an array of wellbeing information on the force intranet with links to additional material and sources of help and support. Examples include the National Police Wellbeing Service and Police Care UK. ACC Covid-19 Bulletins, HR Updates, Need to Know publications and emails are used to highlight updates and provide links to specific items e.g. Keeping in Touch Guidance.
- All mobile devices issued to staff for home / agile working are assured in terms of security through an NEP designed build and are encrypted end to end (NEP is the National Enabling Programme sponsored by the NPCC that provides additional security components).
- Managers are actively encouraged to communicate with their staff on a regular basis and monitor their health and wellbeing. A system of regular one to ones and strength-based conversations is in place to facilitate this. During the pandemic additional guidance was issued to managers in relation to remote working, via publications on the force intranet and Sergeant and Inspector Briefing Days.
- Staff feedback on agile working was sought in January 2021 to inform arrangements for agile working post pandemic. Following consultation with Unison, police staff terms and conditions of employment have already been updated to provide the opportunity to work flexibly between home and work on a rota basis up to 3 days per week.

There are no audit recommendations arising from this audit review.

Deputy Chief Constable Comments

The emergence of the coronavirus pandemic created an urgent need to move to agile working to protect our employees, their families and the public. This was necessarily done at pace, but not from a standing start as much work had already been done in the force to enhance technology solutions and mobile working. This enabled us to make good progress towards wider agile working, but the ebb and flow of pandemic infection rates inevitably meant that resources continually had to be re-prioritised to deal with the most pressing risks. It is unsurprising in this context that some areas still need to be worked on to fully embed the strategic intent in our estates, fleet and deployment models, but it is welcome to see that the work the force has done here has been recognised and offers adequate assurance.

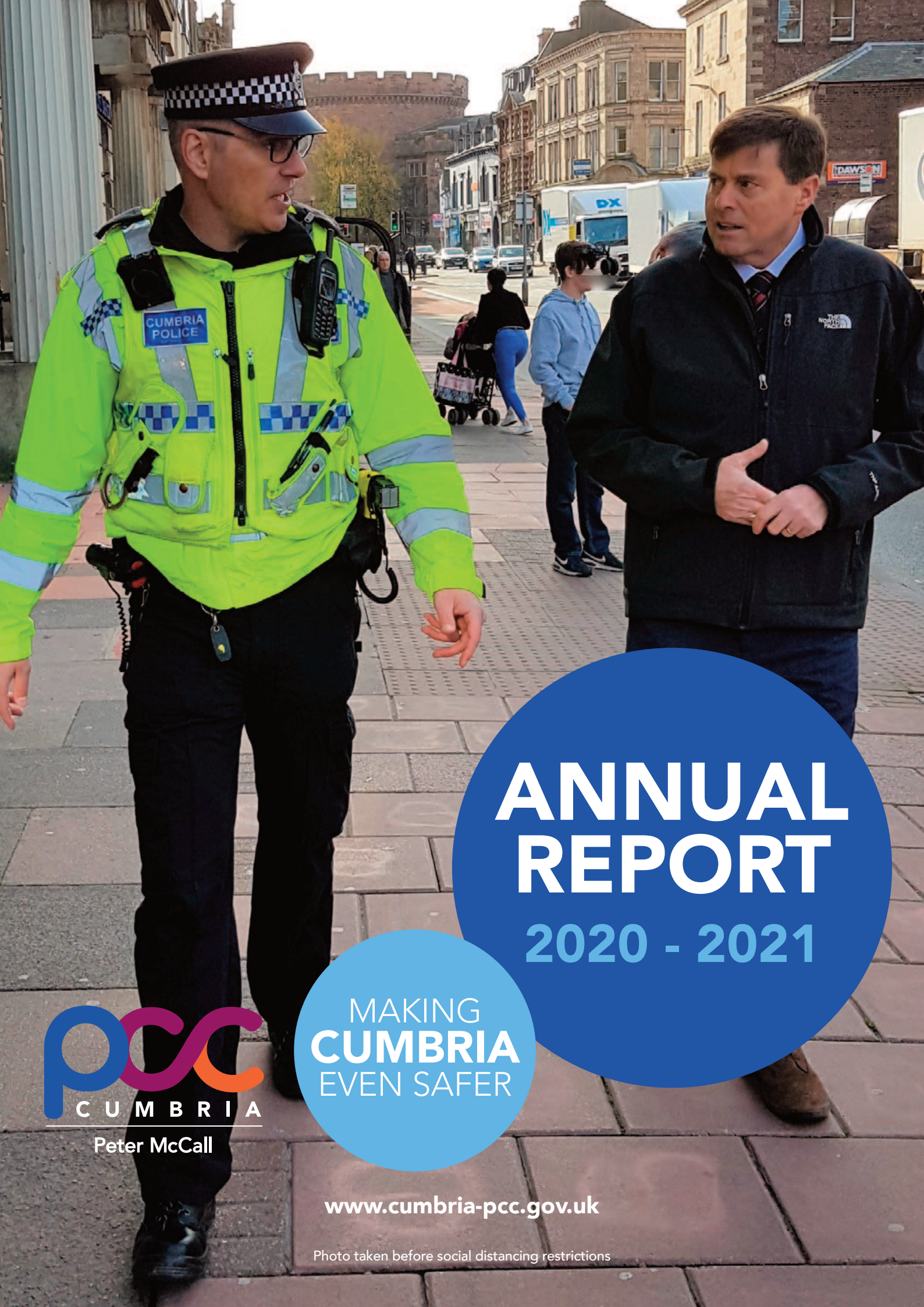
Mark Webster, Deputy Chief Constable

Appendix A

Audit Assurance Opinions

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

Assurance Level	Definition
Substantial	Sound frameworks of governance, risk management and internal control are in place and are operating effectively. Recommendations, if any, will typically be no greater than advisory.
Reasonable	Frameworks of governance, risk management and internal control are generally sound with some opportunities to further develop the frameworks or compliance with them. Recommendations will typically be no greater than medium priority.
Partial	Weaknesses in the frameworks of governance, risk management and/or internal control have been identified or there are areas of non-compliance with the established control framework which place the achievement of system / service objectives at risk. Recommendations will typically include high and medium priority issues.
Limited	There are significant gaps in the governance, risk management and/or internal control frameworks or there are major lapses in compliance with the control framework that place the achievement of system / service objectives at significant risk. Recommendations will include high priority issues.



ANNUAL REPORT

2020 - 2021

MAKING
CUMBRIA
EVEN SAFER



Peter McCall

www.cumbria-pcc.gov.uk

Photo taken before social distancing restrictions



Welcome to my Annual Report which takes a look back at the year 2020/2021. Due to restrictions around the pandemic, the Government took the decision to postpone PCC elections until May 2021, which enabled me to work with the Constabulary and continue to focus on the needs of Cumbria residents during what has been for so many, a very challenging time.

I think the resilience and emotional strength displayed throughout our communities has been incredible and everyone who has played a role in keeping the county safe, should be proud. In particular, I would like to thank all of our frontline police officers, PCSOs, staff and volunteers for their work over the last year. Policing the pandemic has been a huge challenge in which we have all had our civil liberties restricted in a way which is totally alien to us in this country, with constantly changing regulations and advice, it has not been easy for either the public or the police who have had to be on the frontline facing the pandemic throughout.

In the last 12 months, there has been a sustained fall in recorded crime nationally and also here in Cumbria. Understandably, although for 2020/2021 overall crime has fallen by 18.8 %, that equates to a decrease of 7,237 crimes over the last 12 months, demand on the police service has remained significant, with officers working

alongside partners to tackle the pandemic and limit the spread of the virus. As seen nationally, the reduction in crime is largely due to the impact of the pandemic and as society returns to some form of normality over the next 12 months, we anticipate these figures will rise.

As a result of money raised through the council tax, and the Government's national officer uplift programme, I am also very pleased that in the recruitment drive for 2020/2021, the Constabulary have exceeded their targets. Police officer numbers currently stand at 1216 and Cumbria is well placed for any future challenges.

Public engagement is clearly an important part of the job as PCC, and during the year I have continued to run surgeries, attended community meetings, and hosted numerous focus groups and Facebook Live events, to hear first-hand the views of local people about policing priorities in the areas where they live. I am grateful for everyone that has been in touch with feedback and I have been able to share your concerns with the Chief Constable and work together to further improve our policing service in Cumbria.

Policing and keeping our county safe is a shared task for us all: public, third sector and so many volunteers, and I am grateful to everyone who has worked in collaboration with us, to make Cumbria one of the safest places to live and work in the country.

With my very best wishes.

Peter McCall

Police and Crime Commissioner for Cumbria

POLICE AND CRIME PLAN OBJECTIVES

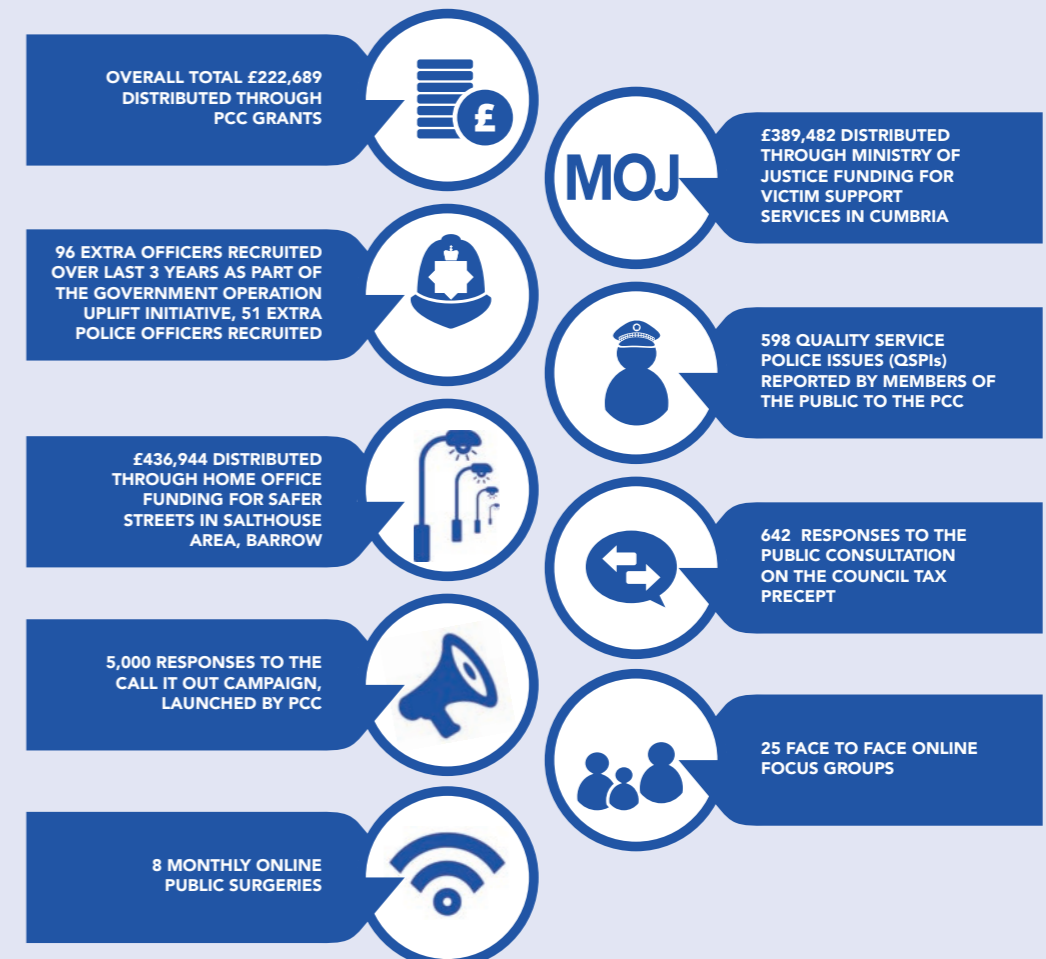


DEMAND ON CUMBRIA CONSTABULARY

1ST JANUARY - 31ST DECEMBER 2020

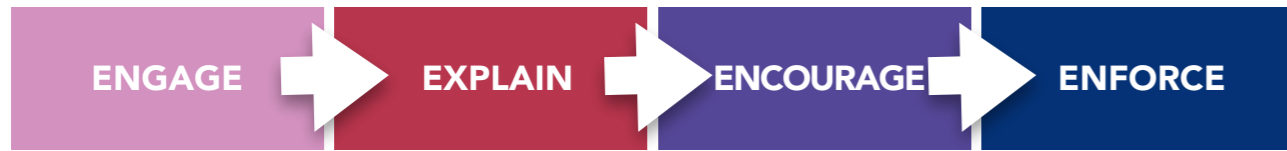


THE YEAR IN NUMBERS



POLICE RESPONSE TO FIRST WAVE COVID-19

As a result of the first national lockdown crime figures from March – September 2020 (Source: Cumbria Constabulary)



of respondents supported the police's approach to engage and advise before issuing a fixed penalty notice



of respondents said they trusted the police to use their powers fairly



Fixed Penalty Notices issued

Number of incidents the police dealt with



Overall crime dropped by 13.9% between March – Sept 2020



Incident numbers of reported crime dropped by



Anti-social (ASB) increased as many of the COVID-19 related incidents were categorized as ASB



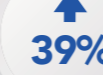
Domestic abuse incidents increased and 2,656 were reported



Child exploitation incidents increased and 341 were reported

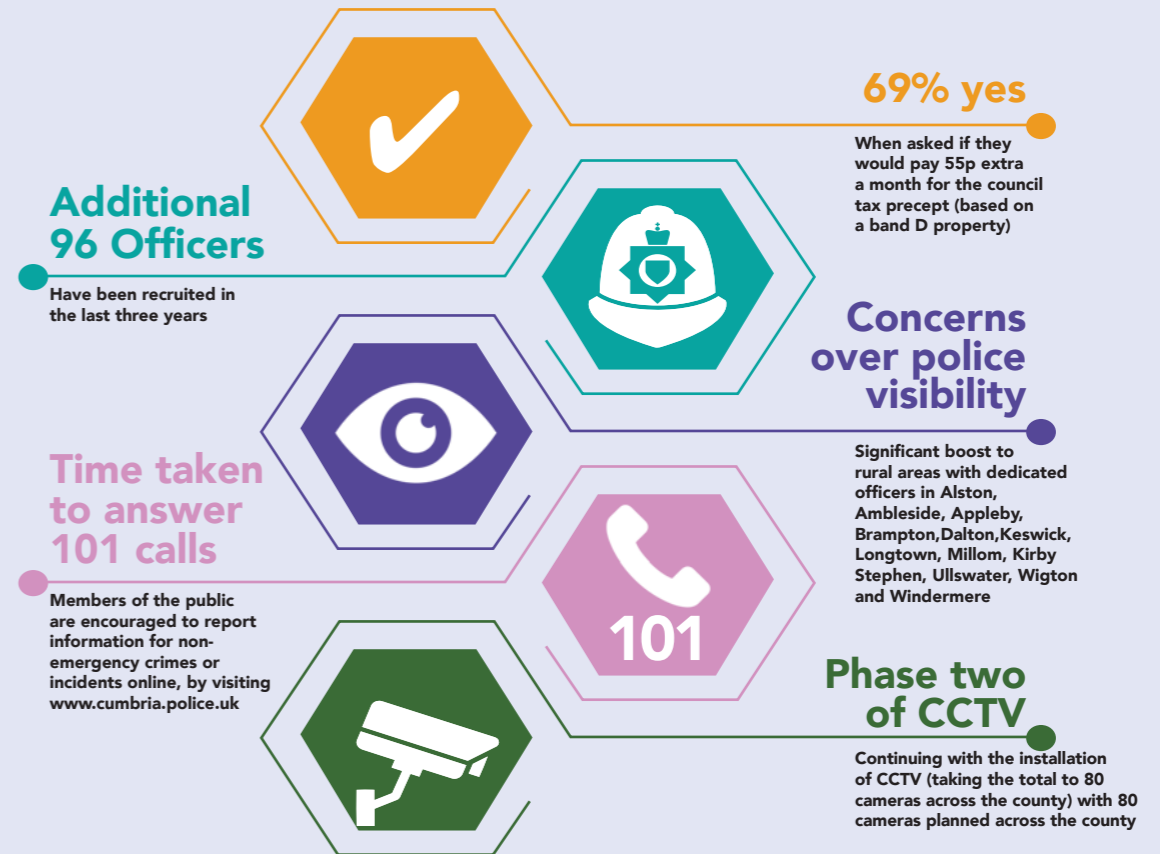


Apparent suicides increased to 50



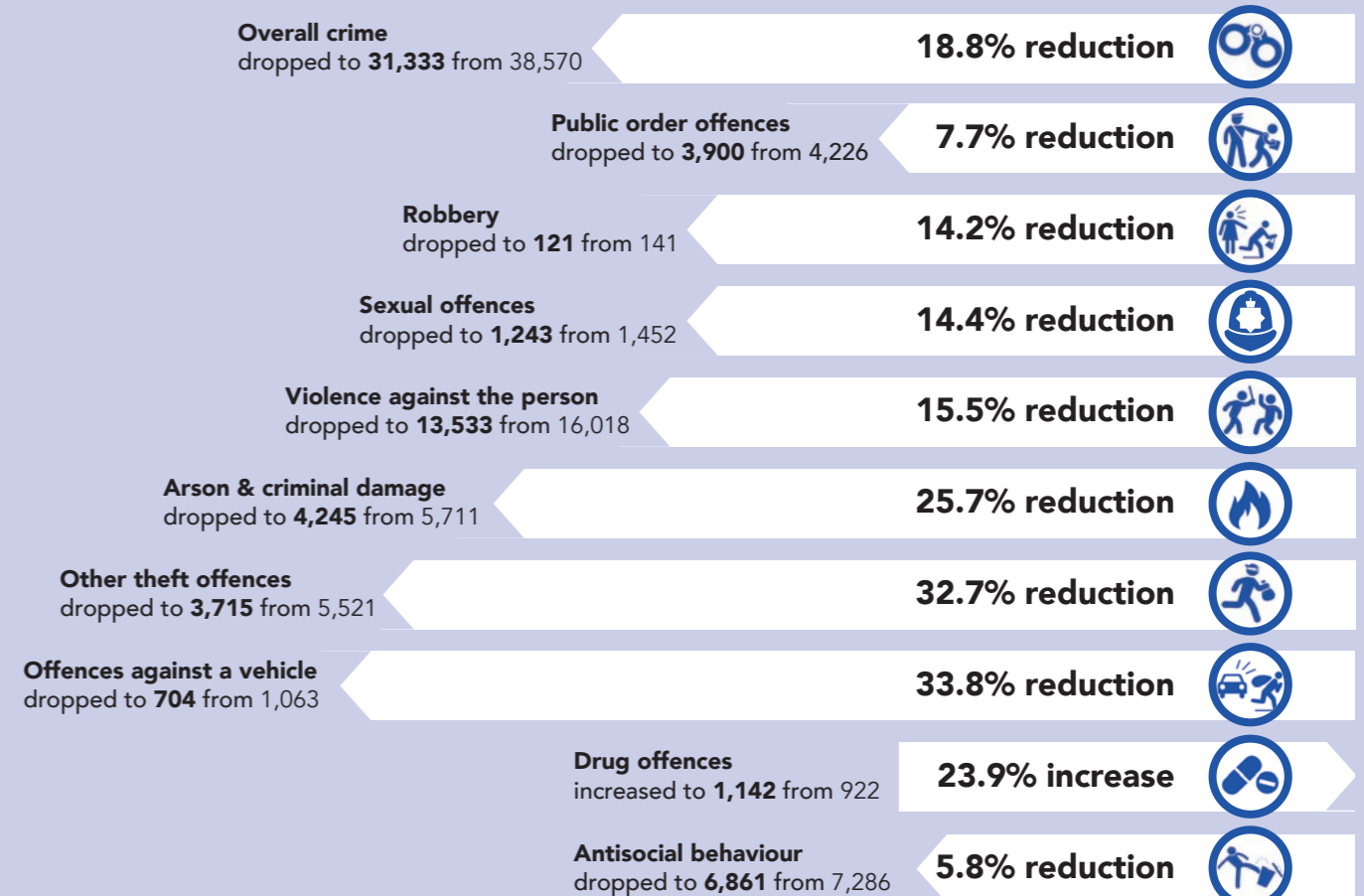
*In comparison to the same period in the previous year

WE ASKED, YOU SAID, WE DID



RECORDED CRIME IN CUMBRIA

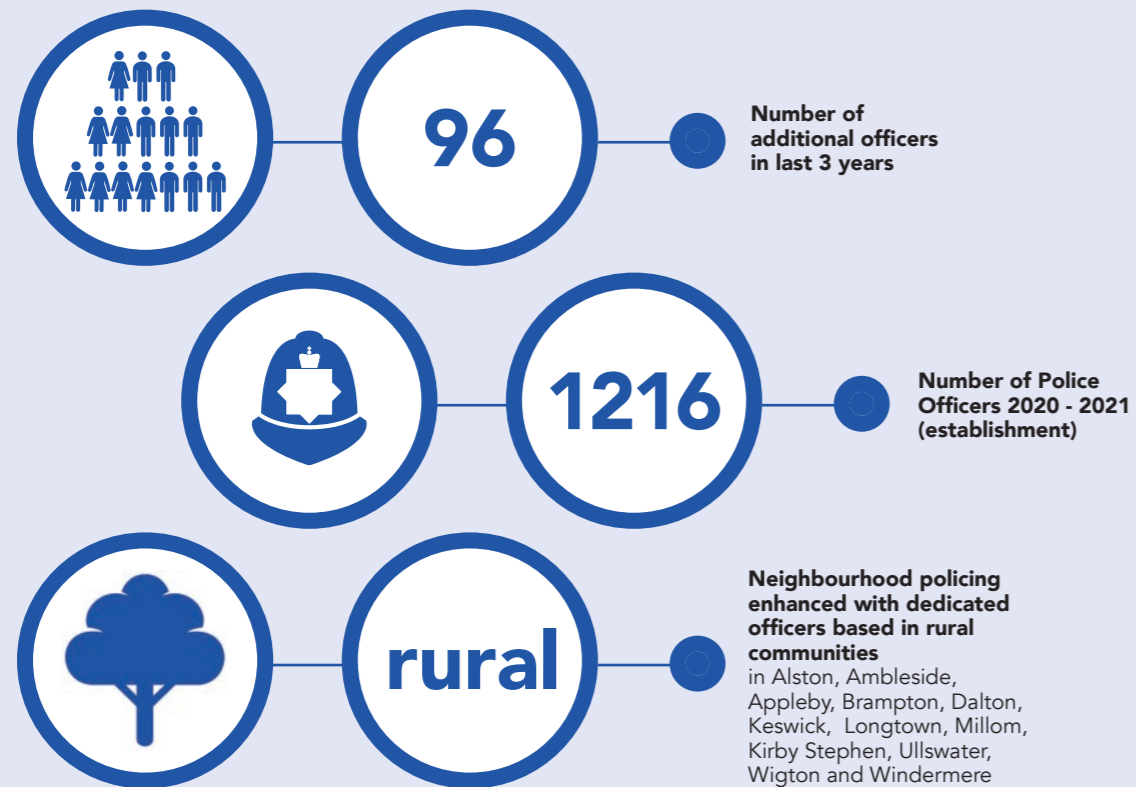
FROM APRIL 2020 TO MARCH 2021 COMPARED TO THE PREVIOUS FINANCIAL YEAR



NB If incidents relating to a breach of Covid regulations are included then there were 11,251 ASB incidents, an increase of 53% when compared to the previous year (7,354)

VISIBLE AND EFFECTIVE POLICE PRESENCE

The PCC has monitored the Constabulary to ensure they achieved:

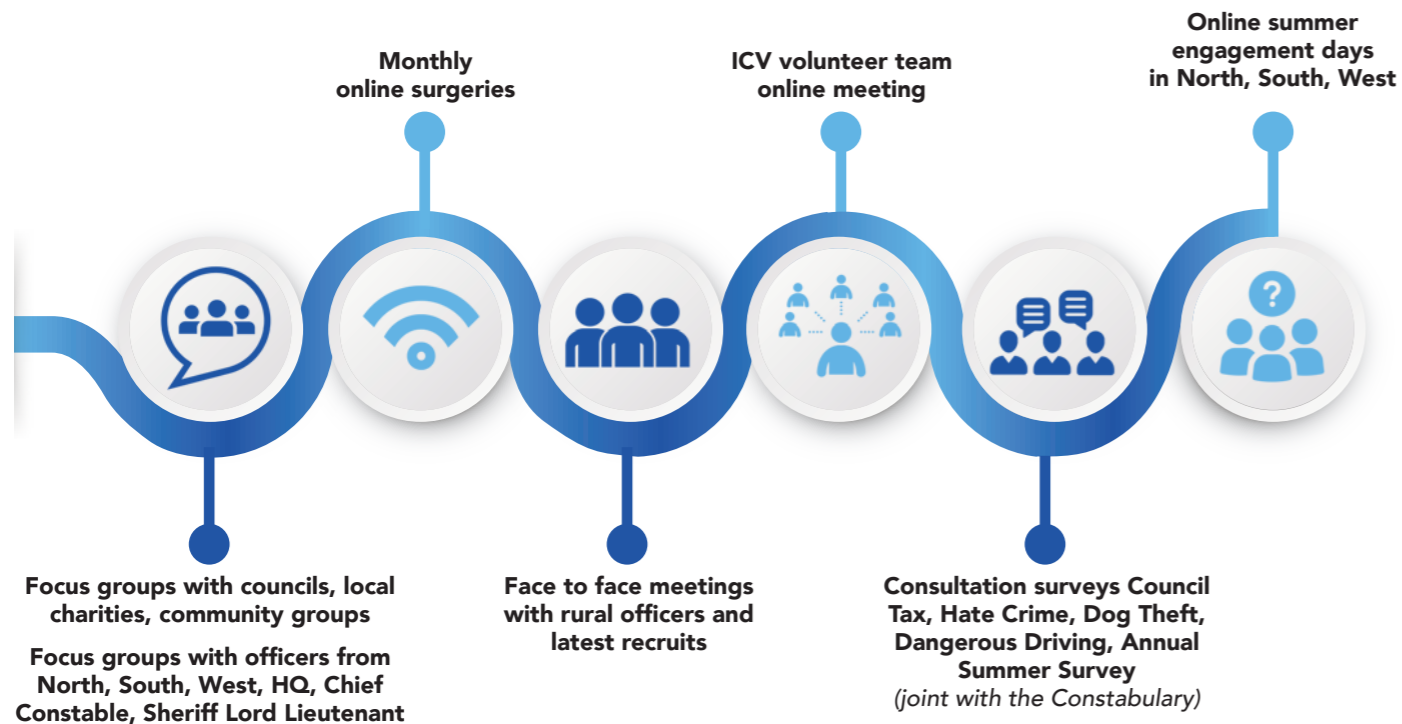


SUPPORTING YOUNG PEOPLE - IN LOCAL PROJECTS, SOCIAL GROUPS, INITIATIVES AND ACTIVITIES

Breakdown of funds (Property fund and COVID-19 fund) that involved young people



LISTENING TO THE VOICE OF THE PUBLIC



ACCOUNTABILITY AND STATUTORY DUTIES

Independent Custody Visitors (ICV) Volunteer Scheme	Working closely with partners	Police & Crime Panel meetings and Joint Ethics & Integrity Panel	Risk management and governance
Joint audit committee for finance & governance	Holding the Chief Constable to account at Public Accountability Conferences	Complaint case reviews	External inspections & auditors provide independent reviews

TACKLING CRIME IN OUR COMMUNITIES

MAKING CUMBRIA EVEN SAFER

Tackling crime and anti-social behaviour

- Continue with installation of Phase Two CCTV – which will take the total to 80 cameras across the county
- Home Office – Safer Streets fund, aiming to reduce the number of burglaries in Salthouse area, Barrow
- Rural crime campaign – joint working with NFU and the force, funding Keep Safe initiative with latest promotion saw 30 security kit requests in one week
- Road safety campaign commissioning Crimestoppers with regular public safety messages focusing on the fatal four
- Prepare major incident plan inline with Local Resilience forum
- Explored the public's experiences of hate crime and their support needs through the STAR project hate crime survey
- Engaged with partner agencies to understand more about what hate crime is being experienced and what support is being provided
- PCC Community COVID-19 Recovery fund £182,084 to local groups
- Safer Cumbria identified key areas of work for how to tackle serious crime

Always put the victim first

- Secured over 1 million pounds for support services from the Government and MOJ
- PCC launched 'Call It Out' campaign – with 5,000 responses
- Home Office Safer Streets fund £436,944 for crime prevention in the Salthouse Rd area in Barrow
- 24hour Live Chat facility, Supportline and My Support Space from Victim Support
- Domestic abuse local provision weekly updates for key partners and regular public messaging comms strategy developed and adapted accordingly throughout all COVID-19 lockdowns and restrictions
- Keep Safe project 369 referrals of which 60% associated with domestic abuse
- Developing pilot for Outreach Womens centres in Penrith and Kendal
- PCC Property fund £46,605 to local 3rd sector organisations
- Home Office STAR initiative, focusing on modern slavery and the hate crime survey
- Lead Quality Assessment framework to measure how criminal agencies are complying with the Victims Code of Practice

Offenders face consequences

- Development of adult out of court disposal framework with force to help reduce re-offending with low level crimes
- Restorative Justice (RJ) mediation work to resolve neighbour disputes and anti-social behaviour
- RJ responded to 437 victims of crime, 9 victim-offender conferences and 65 indirect interventions in last 12 months
- Out of court scrutiny panel monitored around 90 randomly selected cases, providing feedback, identifying areas for learning
- Chaired the Safer Cumbria Partnership and reviewed key strategic priorities, specifically in response to COVID-19
- Collaboration with regional probation and local partners for a review of preventative provision and interventions for hate crime

Focus on online and sexual crime

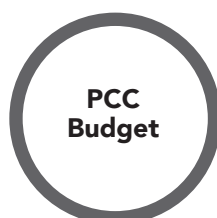
- MOJ COVID-19 Extraordinary Fund £249,482 for domestic abuse and sexual violence organisations due to rise in demand for remote service
- MOJ Rape Support fund £140,000 increasing Independent Sexual Violence Advisors capacity in the county (£60,000 (2020/21) and £80,000 (2021/22))
- Sexual Assault Referral Centre and Cumbria's Victim Support 24hour Supportline
- Regular public messaging around national DA campaigns #YouAreNotAlone, Ask for Ani/Safe Spaces, NPCC Silent Solution 55 initiative and Crimestoppers - spot the signs of DA
- Media campaign for online crime, working in partnership with Constabulary's Cyber and Digital Crime Unit and Get Safe Online e.g. COVID-19 vaccination scams and Action Fraud's doorstep scammers
- Monthly community training events with Get Safe Online
- Supported NSPCC 'ItsNotOk' campaign for online child abuse
- Live Facebook public surgery for online crime
- Projects such as SAFA –self-harm online support packs, Mencap – accessible video explaining online safety and Time to Share Bereavement services for online family counselling funded through PCC's COVID-19 Community Recovery fund





Overall Budget

There was an underspend for the budget for 2020/21 of £503,000 which represents 0.5% of the budget.



PCC Budget

£113,000 overspend due to increased estates costs and reduced investment income



Constabulary's Budget

£616,000 underspend largely due to Operation Uplift (the Government's national programme to recruit 20,000 additional officers by 2023) and the Covid-19 pandemic



Operation Uplift

Police pay almost £890k over budget, as a result of a conscious decision to recruit officers as quickly as possible to meet the Operation Uplift target



COVID-19

Additional PPE, ICT and overtime expenditure was incurred in dealing with the pandemic, but this was offset by Government support and savings on budgets, such as travel and training due to reduced activity

The financial results for the Police and Crime Commissioner's revenue budget for 2020/2021 are summarised in the table below

Description	Budget £000s	Actual Expenditure £000s	(Underspend) / Overspend £000s
Constabulary			
Police Officer Pay	88,239	89,129	890
PCSO Pay	2,272	2,334	62
Police Staff pay	24,387	24,527	140
Non Pay Expenditure	19,878	18,333	(1,545)
Income	(5,429)	(5,592)	(163)
Total Constabulary	129,347	128,731	(616)
PCC			
Office Police Crime Commissioner	812	822	10
Other PCC	(19,961)	(19,858)	103
Total PCC	(19,149)	(19,036)	113
Overall Total	110,198	109,695	(503)



Peter McCall

If you would like this information in braille, audio, large print, easy read or in another language, please contact the Police and Crime Commissioner's office on

01768 217734

or email

commissioner@cumbria-pcc.gov.uk

You can find out more information about how I am carrying out my role on my website:

www.cumbria-pcc.gov.uk

Monitoring Key Audit Recommendations

Introduction

This report is designed to monitor the implementation of recommendations and actions arising from Audit and Inspection. The report fulfills the assurance responsibilities of the Joint Audit Committee with regards to the implementation of control recommendations and best practice arising from Audit and Inspection work.

Appendix A provides a table of all internal audit reports finalised in the current year, the level of assurance provided by the audit and the number of audit recommendations by grade of recommendation.

Report Summary

The table below shows the number of outstanding actions brought forward from the previous update to members and also of new recommendations since the last report.

Summary of Actions	PCC	CC	Joint	Total
Open actions b/fwd from last report	0	2	0	2
New actions since last report	0	9	1	10
Total actions this report	0	11	1	12
Actions completed since last report	0	6	1	7
Open actions c/fwd to next report	0	5	0	5

Members have requested that this summary of recommendations report provides an update on actions where the recommendation was graded High/Medium only. Minor Advisory recommendations are monitored by individual managers.

The table below shows the status of all recommendations, **Appendix B** provides a high level summary of the current status of individual actions and **Appendix C** provides narrative updates in respect of individual recommendations.

Summary of Total Actions by Status	PCC	CC	Joint	Total
Completed	0	6	1	7
Ongoing (within original timescale)	0	3	0	3
Ongoing (original timescale extended)	0	2	0	2
Overdue/ timescale exceeded	0	0	0	0
Not yet due	0	0	0	0
Total	0	11	1	12

Key to Grade:

Cumbria Shared Internal Audit Service

Grade/Priority	
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.

External Audit – Grant Thornton

Grade/Priority	
High	Significant effect on control system
Medium	Effect on control system
Low	Best practice

Monitoring of Individual Audit Reports 2021/22

Audit Report	CC/ PCC/ Joint	Reported Date	Assurance Opinion				Audit Recommendations (Grade)			
			Substantial	Reasonable	Partial	Limite d /None	High	Medium	Advisory	Total
Creditors	Joint	10/09/20		✓			0	2	0	2
Total to JAC 24/09/20			0	1	0	0	0	2	0	2
None										
Total to JAC 19/11/20										
Collision Reduction Officers	CC	10/11/20		✓			0	3	1	4
Trauma Risk Incident Management (TRiM) Follow Up	CC	14/01/21		✓			0	0	0	0
Benefits Delivery Process	CC	12/02/21			✓		1	0	0	1
Total to JAC 17/03/21			0	2	1	0	1	3	1	5
Main Accounting System	Joint	26/04/21		✓			0	1	0	1
Sickness Reporting	CC	29/03/21	✓				0	0	0	0
Reflective Practice Review	CC	10/05/21			✓		2	3	0	5
Sickness Management	CC	12/05/21	✓				0	0	2	2
Police Pensions	CC	12/05/21	✓				0	0	0	0
Financial Sustainability	Joint	13/05/21		✓			0	0	0	0
Contract Management	CC	01/06/21		✓			0	3	1	4
Business Transformation Project Finance	CC	01/06/21		✓			0	1	1	2
Contract Management	PCC	06/05/21	✓				0	0	0	0
Total to JAC 23/06/21			4	4	1	0	2	8	4	14
Total 2020/21 Audit Plan Audits			4	7	2	0	3	15	3	21
Agile Workforce	PCC	04/08/21	✓				0	0	0	0
Complaint Review Process	PCC	24/09/21	✓				0	0	2	2
Agile Workforce	CC	11/10/21		✓			0	0	0	0
Total to JAC 17/11/21			2	1	0	0	0	0	2	2

Audit Report	Recommendation Summary	Current Status					
		Completed	Ongoing (within original timescale)	Ongoing (original timescale extended)	Overdue/ timescale exceeded	Not Yet Due	For detail see page
Recommendations B/fwd from Report to JAC 18/03/20							
Local Focus Hubs (CC)	R2) A PMF should be agreed and shared following full countywide consultation that further supports and informs the identification of priorities and targeted interventions.	✓					6
Benefits Delivery Process (CC)	R1) Arrangements to deliver the benefits realisation strategy should be fully developed and embedded taking into account the points outlined above.	✓					7
Totals B/Fwd Recommendations		2	0	0	0	0	
New Recommendation Since Last Report							
Main Accounting System (Joint)	R1) Ensure that all required control account reconciliations are produced on a monthly basis. Review of bank and control account reconciliations should be completed in a timely manner and within target dates.	✓					8
Reflective Practice Review (CC)	R1) A plan for rolling out training on RPRP-PRI should be developed, approved by management and delivered across the Constabulary. Items to consider as part of the plan should include timescales, who the training will be initially focussed at (e.g. line managers and supervisors), arrangements for cascading and embedding the training throughout the organisation and how the training will be delivered (e.g. through e-learning, classroom based, as part of the promotion process etc.).		✓				9
Reflective Practice Review (CC)	R2) Arrangements should be put in place to identify whether any themes are emerging from the RPRP-PRI process which highlight organisational learning and would require a corporate response (this links to recommendation 1 on awareness raising and training).		✓				10
Reflective Practice Review (CC)	R3) RPRP-PRI procedure prepared by the Constabulary should be reviewed, approved and communicated within the Constabulary.	✓					11
Reflective Practice Review (CC)	R4) The quality assurance process for RPRP-PRI should be agreed and approved as part of the embedding of the overall process.	✓					12

Reflective Practice Review	R5) Arrangements for recording RPRP-PRI should be explored to ensure that the information is captured and retained organisationally.		✓				13
Contract Management (CC)	R1) A standardised documented approach to contract management is required to establish a clear direction, clarify expectations and provide guidance and support to practitioners so that there is a consistent approach across the organisation which contributes to long term objectives.	✓					14
Contract Management (CC)	R2) Contract management roles, responsibilities and accountabilities should be clearly defined and documented.			✓			15
Contract Management (CC)	R3) Arrangements should be in place to determine what contract management training is required, by whom and ensure that it is delivered.			✓			16
Business Transformation Project Finance (CC)	R1) Ensure that lessons learned are shared with the wider Business Transformation Project, as part of a commitment to continuous improvement.	✓					17
Total New Recommendations		5	3	2	0	0	
Total All Recommendations		7	3	2	0	0	

Audit Report: Local Focus Hubs				
Date Issued: 09/09/2019	Date Considered by JAC: 19/09/2019	Report of: Shared Internal Audit Service		Report for: CC
Recommendation: R2) A PMF should be agreed and shared following full countywide consultation that further supports and informs the identification of priorities and targeted interventions.				Grade: Medium
Agreed Action: 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. There has been a different pace of development across the County which made it challenging to implement it in its entirety in each location. 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. 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. 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.				Due Date: 31 December 2019 Responsible Person: Superintendent South Sarah Jackson
Subsequent Updates: November 2019 - As detailed within recommendation one, the Constabulary has a desire to develop a public health approach to policing. This renewed model will require extensive consultation with public and third sector agencies to facilitate the joint creation of multiagency integrated local focus hubs. An essential task will be the development of a joint performance framework, as well as the generation of risk management and partnership relationship agreements. It will also demand a review of internal cross command operating procedures. In order to realise the full benefits of a truly collaborative arrangement, the creation of a performance management framework cannot be undertaken by the police in isolation. It is essential that any design of the hubs, supporting policy and procedures must be co-produced with interested agencies, many of which are themselves bound by their own target operating models. The task to deliver on this recommendation is complex and will require significant negotiation with multiple partners, at scale. Whilst the task has already begun, it will be several months before the hubs are operating sufficiently well to evidence the delivery of an embedded PMF. Therefore, a request to extend the delivery against this recommendation is sought. February 2020 – On 2nd Feb 2020 Chief Officers committed to delivering a child centered and early intervention approach via the NPT Local Focus Hubs. The revised hubs will support the place based Public Health and Contextual Safeguarding agendas of our county, district and wider partnerships. The change programme will require extensive internal remodeling to rationalise workflows across TPA, CJ and Crime Commands, as well as co-production of data sharing agreements, assessment models, and performance management frameworks (not exhaustive) with partners in the public and third sector. Chief Officers have invested two dedicated Inspectors to develop a pilot delivery site in the Barrow Hub, and subject to review and approval, scale the model up across the other five hubs. Governance will be bi-monthly to the management Board with an estimated completion date of February 2021. September 2020 – Due to this being a piece based entirely on collaboration the action has been impacted by Covid. That said, a draft LFH performance framework is in place, and a draft Child Centred Policing framework has been developed. The ambition is to converge the two separate entities once the CCP teams are established, and their initial referral mechanism has been finalised. The teams only went live on 1/9/20 and so it is too early to finalise. November 2020 – The CCP policing teams are now established and a draft outcomes framework has been agreed. CCP teams will be linked into LFH work. This will be rolled out imminently across each of the 3 TPAs. The revised draft outcome framework from the LFH has also been established and is being launched across the 6 hubs. All hubs are now migrating onto TEAMS for their case management and referral processes. It is envisaged that this action will be completed in February 2021. March 2021 - The Safer Neighbourhood Meeting reviewed the position of the PMF at its meeting on the 5th March 2021. An updated version of the framework is out for final consultation (ending April 2021), at which time this action will be completed. September 2021 – All LFH are now using the Performance Management Framework. Neighbourhood policing is about to be inspected by HMICFRS which will give reassurance to the delivery of this action.				
Status:	Agreed Changes to Due Date: (N.B. any changes to due date must be agreed by COG or a Governance Board)	New Date:		Where & When Approved:
Completed		February 2021 May 2021		COG 02/02/20 COG 08/03/21

Audit Report: Benefits Delivery Process																											
Date Issued: 12 February 2021	Date Considered by JAC: 17 March 2021	Report of: Shared Internal Audit Service	Report for: CC																								
Recommendation: R1) Arrangements to deliver the benefits realisation strategy should be fully developed and embedded taking into account the points outlined above.			Grade: High																								
Agreed Actions:			Due Date: 31 March 2021																								
<table border="1"> <thead> <tr> <th>Action</th> <th>Complete by</th> </tr> </thead> <tbody> <tr> <td>Identify a lead with responsibility for benefits management within BIU</td> <td>Completed: Adam Sutton Change Manager</td> </tr> <tr> <td>Create a new procedure – documenting background and process that will be followed moving forward, including guidance on what's to be included</td> <td>Completed</td> </tr> <tr> <td>Update COG templates and communicate</td> <td>5 February 2021</td> </tr> <tr> <td>Update Business Case templates (include ICT who have their own template) and communicate</td> <td></td> </tr> <tr> <td>Create a training pack for SROs – this will ensure we can demonstrate with have adopted the new process</td> <td>5 Feb 2021 – training pack 12 Feb 2021 – training & discussions</td> </tr> <tr> <td>Update existing Benefits Realisation document – seek to simplify where possible. This includes existing IT projects.</td> <td>12 February 2021</td> </tr> <tr> <td>Create a MI template for quarterly COG updates</td> <td>12 February 2021</td> </tr> <tr> <td>Look back at the decisions made by COG in the past 24 months and ensure these are captured on the BR register</td> <td>12 February 2021</td> </tr> <tr> <td>Look at the proposed benefits listed on the updated V25 roadmap and ensure these are listed on the BR register</td> <td>12 February 2021</td> </tr> <tr> <td>Cross reference with the CCIP to remove duplication / adopt any actions that sit better with the BR register</td> <td>12 February 2021</td> </tr> <tr> <td>Start quarterly reporting to COG/Agreed Gov. Boards</td> <td>1 March 2021</td> </tr> </tbody> </table>			Action	Complete by	Identify a lead with responsibility for benefits management within BIU	Completed: Adam Sutton Change Manager	Create a new procedure – documenting background and process that will be followed moving forward, including guidance on what's to be included	Completed	Update COG templates and communicate	5 February 2021	Update Business Case templates (include ICT who have their own template) and communicate		Create a training pack for SROs – this will ensure we can demonstrate with have adopted the new process	5 Feb 2021 – training pack 12 Feb 2021 – training & discussions	Update existing Benefits Realisation document – seek to simplify where possible. This includes existing IT projects.	12 February 2021	Create a MI template for quarterly COG updates	12 February 2021	Look back at the decisions made by COG in the past 24 months and ensure these are captured on the BR register	12 February 2021	Look at the proposed benefits listed on the updated V25 roadmap and ensure these are listed on the BR register	12 February 2021	Cross reference with the CCIP to remove duplication / adopt any actions that sit better with the BR register	12 February 2021	Start quarterly reporting to COG/Agreed Gov. Boards	1 March 2021	Responsible Person: Superintendent Business Improvement Unit, Andy Wilkinson
Action	Complete by																										
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<p>March 2021 – New procedure and documentation has been prepared and is awaiting roll out. The COG template has been updated and needs communicated, a process impact assessment has also been included at the request of the DCC. Guidance documents prepared for SROs. A new benefit realisation tracking document has been developed which will capture the hi level financial and productivity benefits, with more detailed information about lower level specific benefits being captured by existing boards. A format for quarterly reporting to COG and Governance Boards will be established and initiated by 31/03/21.</p> <p>September 2021 – The business (and COG) templates have been consulted upon, updated and disseminated for use. These have already been used, an example being the Mental Health Inspector growth which has been the first full BR process to be captured (proposed via the template, presented and agreed at COG, updated onto the tracking system and now being monitored for reporting upon.)</p> <p>In addition to what was proposed in the initial work, training and online Q and A sessions have been arranged and now completed across the force.</p> <p>At the time of writing, pre-identifiable benefits for projects have been updated onto the tracker and the new system is established. Some pre-existing benefits (prior to the BR system being established) have either not been provided with sufficient and accurate detail, or now appear non-achievable. T/DCI Graham-Cummings is working with Insight and Performance to produce a report covering these challenges to enable COG to make a decision on an extension to the projects / benefit expectations, or to record them as losses.</p>																											
Status:	Agreed Changes to Due Date:	New Date:	Where & When Approved:																								
Completed	(N.B. any changes to due date must be agreed by COG or a Governance Board)																										

Audit Report: Main Accounting System			
Date Issued: 26/04/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: Joint
Recommendation: R1) Ensure that all required control account reconciliations are produced on a monthly basis. Review of bank and control account reconciliations should be completed in a timely manner and within target dates.			Grade: Medium
Agreed Actions: The monthly/quarterly processes around bank and control account reconciliation are a key part of the financial controls. While I am confident that the reconciliations have been completed, the fact that the supervisor review has not always been undertaken in a timely manner is of concern. The financial year 2020/21 has been challenging in two respects, firstly as a result of the covid pandemic and the requirement for the team to work from home and secondly as a result of the change in financial ledger system, these factors have perhaps contributed to this lack of timely review during 2020/21. The Financial Services Managers have been reminded of the importance of the timely completion of these reconciliations, their subsequent review/QA by a supervisor and the need to demonstrate an audit trail that the work has been done.			Due Date: 30/04/2021 Responsible Person: Deputy Chief Finance Officer Michelle Bellis
Subsequent Updates: August 2021 - The Financial Services Managers have been reminded of the importance of the timely completion of these reconciliations, their subsequent review/QA by a supervisor and the need to demonstrate an audit trail that the work has been done.			
Status:	Agreed Changes to Due Date: (N.B. any changes to due date must be agreed by COG or a Governance Board)	New Date:	Where & When Approved:
Completed			

Audit Report: Audit of Reflective Practice Review Process – Practice Requiring Improvement			
Date Issued: 10/05/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R1) A plan for rolling out training on RPRP-PRI should be developed, approved by management and delivered across the Constabulary. Items to consider as part of the plan should include timescales, who the training will be initially focussed at (e.g. line managers and supervisors), arrangements for cascading and embedding the training throughout the organisation and how the training will be delivered (e.g. through e-learning, classroom based, as part of the promotion process etc.).			Grade: High
Agreed Actions: We will develop a plan for rolling out training on RPRP-PRI. The plan will include timescales to enable delivery of training throughout the organisation. We are now utilising the MLE Training Package which will provide input in two formats. <ol style="list-style-type: none"> 1) Supervisors 2) All members of staff (recipients) It is anticipated this initial phase will see completion by Autumn 2021 updated to 30 November 2021 following JAC discussion in June).			Due Date: Plan to be drawn up by end April 2021 Responsible Person: Head of Professional Standards DCI Craig Smith
Subsequent Updates: August 2021 - Process is progressing. All DCI and CI have been briefed around the process. The Head of Professional Standards is currently working with Media and Marketing to formulate a Streams video for wider organisational learning. November 2021 - This is still ongoing with Media and Marketing however, the use of RPRP is increasing widely, last quarter the process used 16 times.			
Status:	Agreed Changes to Due Date: (N.B. any changes to due date must be agreed by COG or a Governance Board)	New Date:	Where & When Approved:
Ongoing (within original timescale)			

Audit Report: Audit of Reflective Practice Review Process – Practice Requiring Improvement			
Date Issued: 10/05/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R2) Arrangements should be put in place to identify whether any themes are emerging from the RPRP-PRI process which highlight organisational learning and would require a corporate response (this links to recommendation 1 on awareness raising and training).			Grade: High
Agreed Actions: The process to identify themes and organisational learning identified through RPRP-PRI will be built into the plan to be developed as part of recommendation 1 We are currently working with IT to develop an existing process (Secondary Business Interests), as a model to address this priority. It is anticipated the adoption of this system will facilitate the individual and organisational learning that will fall out of the process.			Due Date: Themes & organisational learning to be identified by March 2022 once arrangements have had sufficient time to embed. Responsible Person: Head of Professional Standards DCI Craig Smith
Subsequent Updates: August 2021 - The IT solution has been given the highest priority regarding to resolving this solution. Work is ongoing with IT and is to be completed by 30 November 2021. November 2021 - IT solution is now in "Test" phase with an anticipated delivery before Christmas.			
Status:	Agreed Changes to Due Date: (N.B. any changes to due date must be agreed by COG or a Governance Board)	New Date:	Where & When Approved:
Ongoing (within original timescale)			

Audit Report: Audit of Reflective Practice Review Process – Practice Requiring Improvement			
Date Issued: 10/05/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R3) RPRP-PRI procedure prepared by the Constabulary should be reviewed, approved and communicated within the Constabulary.			Grade: Medium
Agreed Actions: The procedure has now been approved by the Head of PSD and the process will be communicated within the Force in line with the plan to be developed as part of recommendation 1. We are now utilising the MLE Training Package which will provide input in two formats. 1) Supervisors 2) All members of staff (recipients) It is anticipated this initial phase will see completion by Autumn 2021 30 November 2021 updated following JAC discussions in June.			Due Date: Procedure approved March 2021 Initial phase completion Autumn 2021 updated following JAC 30 November 2021 Responsible Person: Head of Professional Standards DCI Craig Smith
Subsequent Updates: August 2021 - As per R1) above. This work is ongoing. November 2021 - The role out and embedding continues with wider increase in use from PRI and Reflective Practice.			
Status:	Agreed Changes to Due Date: <i>(N.B. any changes to due date must be agreed by COG or a Governance Board)</i>	New Date:	Where & When Approved:
Completed			

Audit Report: Audit of Reflective Practice Review Process – Practice Requiring Improvement			
Date Issued: 10/05/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R4) The quality assurance process for RPRP-PRI should be agreed and approved as part of the embedding of the overall process.			Grade: Medium
Agreed Actions: The quality assurance process has now been agreed and is embedding.			Due Date: 31/03/2021 Responsible Person: Head of Professional Standards DCI Craig Smith
Subsequent Updates: August 2021 - The quality assurance process has now been agreed and is embedding			
Status:	Agreed Changes to Due Date: (N.B. any changes to due date must be agreed by COG or a Governance Board)	New Date:	Where & When Approved:
Completed			

Audit Report: Audit of Reflective Practice Review Process – Practice Requiring Improvement			
Date Issued: 10/05/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R5) Arrangements for recording RPRP-PRI should be explored to ensure that the information is captured and retained organisationally.			Grade: Medium
Agreed Actions: We are currently working with IT to develop an existing process (Secondary Business Interests), as a model to address this priority. It is anticipated the adoption of this system will facilitate the individual and organisational learning that will fall out of the process. Timescales are currently looking at 4 – 6 months to implement following agreement of the proof of concept.			Due Date: 4-6 months following agreement of the proof of concept Responsible Person: Head of Professional Standards DCI Craig Smith
Subsequent Updates: August 2021 - update as per R2 above. November 2021 - The process of organisational learning will be supported through the use of a PSD “Diversion Officer” who will have responsibility for this and other reflective learning practices.			
Status:	Agreed Changes to Due Date: <i>(N.B. any changes to due date must be agreed by COG or a Governance Board)</i>	New Date:	Where & When Approved:
Ongoing (within original timescale)			

Audit Report: Contract Management			
Date Issued: 01/06/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R1) A standardised documented approach to contract management is required to establish a clear direction, clarify expectations and provide guidance and support to practitioners so that there is a consistent approach across the organisation which contributes to long term objectives.			Grade: Medium
Agreed Actions: Within the current Commercial reorganisation all Business Partners will be “owners” of a Professional activity. As such there will be a lead for Contract Management. Training will be provided and an assessment for suitability is underway of the Government Commercial Function Contract Management Training Program. Implementing the actions described (Scorecard and Supplier Status) are to be progressed commencing with critical suppliers. A Contract Management Handbook (practitioner guidance) to complement the Procurement Guidance Handbook will be developed.			Due Date: 30 September 2021 Responsible Person: Head of Commercial Barry Leighton
Subsequent Updates: September 2021 - Progress is underway and expected to be complete late Sept early October. November 2021 – In place with critical contracts incl. control room and custody medical. Continued development through 2022.			
Status:	Agreed Changes to Due Date: (N.B. any changes to due date must be agreed by COG or a Governance Board)	New Date:	Where & When Approved:
Completed			

Audit Report: Contract Management			
Date Issued: 01/06/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R2) Contract management roles, responsibilities and accountabilities should be clearly defined and documented.			Grade: Medium
Agreed Actions: A Contract Performance dashboard, based on the Central Government model, is to be produced for critical contracts as a pilot. This will be populated by "contract managers" from the business (with designated Commercial Team support) and presented to Business Board each quarter.			Due Date: 30 September 2021 Responsible Person: Head of Commercial Barry Leighton
Subsequent Updates: September 2021 - Progress is underway and expected to be complete late Sept early October within the document referred to in Recommendation 1. November 2021 - Draft in place based on CIPS and CIPFA documents. Stakeholder discussions commenced targeting publication January 2022.			
Status:	Agreed Changes to Due Date: <i>(N.B. any changes to due date must be agreed by COG or a Governance Board)</i>	New Date:	Where & When Approved:
Ongoing (original timescale extended)		31/01/2022	TBC

Audit Report: Contract Management			
Date Issued: 01/06/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R3) Arrangements should be in place to determine what contract management training is required, by whom and ensure that it is delivered.			Grade: Medium
Agreed Actions: Training will be provided and an assessment for suitability is underway of the Government Commercial Function Contract Management Training Program. This program provides training at introductory, intermediate and advanced level and could be adapted for Police Forces. The intention is for Commercial Business Partners to receive intermediate level training and then train nominated contract managers within the business.			Due Date: 30 September 2021 Responsible Person:
Subsequent Updates: September 2021 - Progress is underway and expected to be complete late Sept early October. Delivery will be in a timely manner dependent on requirements. November 2021 - Wider delivery of training is through Bluelight Commercial not available until 2022			
Status:	Agreed Changes to Due Date: <i>(N.B. any changes to due date must be agreed by COG or a Governance Board)</i>	New Date:	Where & When Approved:
Ongoing (original timescale extended)		31/03/2022	TBC

Audit Report: Business Transformation Project Finance			
Date Issued: 01/06/2021	Date Considered by JAC: 23/06/2021	Report of: Shared Internal Audit Service	Report for: CC
Recommendation: R1) Ensure that lessons learned are shared with the wider Business Transformation Project, as part of a commitment to continuous improvement.			Grade: Medium
Agreed Actions: Agreed management action: Many of the actions arising from the peer review of the BTP project relate to work which is planned in phase 2 of the project for example service re-design where the emphasis will be on collaborative working and realising benefits. In the time between the peer review and audit the focus has been on ensuring that the finance and procurement systems went live and operated as effectively as possible, which is consistent with the recommendations of the peer review. Opportunities for wider learning are restricted by the fact that there are generally fewer interdependencies between this element of the project, which is centred on the procure to pay process, than the other strands, which are very people focused. Nevertheless, the ICT Business Development Manager, Deputy CFO and Head of Central Services all sit on other BTP boards including Duties and have been to communicate relevant knowledge in these forums. Members of the Finance and Procurement project will continue to advise and work collaboratively to ensure that all elements of BTP operate as efficiently as possible. These lessons learnt will also be considered across the portfolio of Projects moving forward.			Due Date: 30 June 2021 Responsible Person: Joint Chief Finance Officer Roger Marshall
Subsequent Updates: November 2021 - Finance continue to be represented on board for business transformation workstreams and provide advice where appropriate. The Joint CFO sits on the overarching service design board and is able to advise on progress in relation to the finance & procurement workstream and provide advice on cross cutting themes.			
Status:	Agreed Changes to Due Date: <i>(N.B. any changes to due date must be agreed by COG or a Governance Board)</i>	New Date:	Where & When Approved:
Completed			

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The Role of the Joint Chief Finance Officer (Core CFO Responsibilities)

Joint Audit Committee: 17 November 2021

Originating Officer: Michelle Bellis, Deputy Chief Finance Officer,

Agenda Item 13 (a)

Introduction

The Police Reform and Social Responsibility Act 2011 requires the PCC to appoint a Chief Executive and a Chief Financial Officer (CFO), the act also requires the Chief Constable to appoint a CFO. Members will recall that in May 2017 a decision was taken by the Police and Crime Commissioner and the Chief Constable that the statutory requirement to have a Chief Finance Officer would be delivered through a shared post of Joint Chief Finance Officer and that Roger Marshall, who previously acted as the Chief Constable's CFO would take on the new Joint Role.

Statutory background - Section 151 of the Local Government Act 1972 requires local authorities (which include Chief Constables and Police and Crime Commissioners) to make arrangements for the proper administration of their financial affairs and appoint a Chief Finance Officer to have responsibility for those arrangements.

As part of the arrangements for reviewing governance within the OPCC and Constabulary the role of the Joint Chief Finance Officer has been formally assessed against the CIPFA role. The attached form documents the review and sets out how compliance is achieved with the CIPFA CFO responsibilities.

In March 2021, CIPFA published their guidance document “the role of Chief Finance Officers in Policing” this document specifically relates to the role within policing where previous publications were generic in relation to local government bodies. The police specific guidance builds heavily on CIPFAs statements on the role of the CFO in public services and the role of the CFO in local government.

The CFO occupies a critical position in any organisation, holding the financial reins of the business and ensuring that resources are used wisely to secure positive results.

Combined CFO arrangements do not contravene the provisions of the 2011 Act or the Policing and Crime Act 2017. However, PCC and Chief Constables need to make proper arrangements, anticipating where risks could arise, and should include potential safeguards such as:

- Including separate deputy CFO roles.
- An annual review by the Joint Audit Committee to ensure that the Joint CFO is not subject to undue pressure by either the PCC or Chief Constable.
- Use of internal audit, external audit, HMICFRS, peer review or professional accountancy bodies to offer advice on specific issues.

All parties should be aware that the CFO’s responsibilities also include a wider stewardship role on behalf of the public, which is a key aspect of their independence. The annual governance review should include an evaluation of the risks.

Within Cumbria, the risks and arrangements in the event of conflict are documented in a Joint CFO Protocol.

The CIPFA guidance also provides for the possibility for PCCs to take responsibility for Fire and Rescue under the Policing and Crime Act 2017. This aspect has not been examined in any great detail at the moment whilst plans for Local Government Reform in Cumbria are finalised.

The CIPFA guidance sets out the five principles that recognise the core activities and behaviours attaching to the Role of the CFO and the organisational arrangements needed to support them. Successful implementation of each of the principles requires the right ingredients in terms of:

- The Organisation, governance requirements
- The Role, Core CFO responsibilities
- The Individual, personal skills and performance standards.

This assessment deals solely with the Core CFO responsibilities. Throughout this document, **text in green** highlights for members where there has been a change from the previous document presented in 2019.

Conclusion

The internal assessment provided assurance that the OPCC and Constabulary are 100% compliant with the requirements of the CIPFA Role.

CUMBRIA VISION 25



LOCAL POLICING / WORKFORCE / SPECIALIST CAPABILITIES / BUSINESS SUPPORT / DIGITAL POLICING

Principle 1 - The Chief Finance Officer of the PCC and/or CC is a key member of the Leadership Team, helping it to develop and implement strategy and to resource and deliver the PCC's strategic objectives sustainably and in the public interest.

1.1 Contributing to the effective leadership of the PCC and CC, maintaining focus on its purpose and vision through rigorous analysis and challenge.

Within the OPCC, the Joint CFO is a member of the Commissioner's Executive Team leads on arrangements for financial governance and contributes to all areas of corporate governance.

Within the Constabulary, the Joint CFO is a member of the Chief Officer Group and leads on arrangements for financial governance.

The Joint CFO is also a member of the Constabulary's Governance Board structure with monthly meetings covering Workforce; Business Support; Digital Policing and Operational Policing. **The Joint CFO is also a member of the DCC's Management Board that scrutinises performance across the Constabulary.** The Joint CFO is also a member of the Collaborative Board (a joint board between the Constabulary and Office of the PCC), contributing to the challenge and scrutiny of strategic recommendations to the Constabulary Chief Officer Group. The Joint CFO contributes to other Constabulary strategic boards where significant investment and business change is being delivered e.g. mobile and digital, emergency services network and major estates schemes such as the West Cumbria Estate Board.

1.2 Contributing to effective corporate management, including strategy implementation, cross organisational issues, integrated business and resource planning, risk management and performance management.

Within the OPCC, the Joint CFO is a member of the OPCC Executive Team. The team meets on a regular basis to discuss cross cutting corporate and strategic issues. The Joint CFO leads on financial risks and under the arrangements for governance is consulted on wider arrangements for non-financial corporate governance and risk management. The Joint CFO will contribute to scrutiny of the performance of the Constabulary at meetings of the Collaborative Board. Cross cutting issues between the OPCC and Constabulary are included on the agenda of meetings of the Collaborative Board comprising Constabulary Chief Officers, Directors, the OPCC Chief Executive and Joint Chief Finance Officer.

Within the Constabulary, the Joint CFO is a member of the Chief Officer Group. The group meets on a weekly basis with an agenda that incorporates cross cutting corporate and strategic issues. The Joint CFO leads on financial risks and under the arrangements for governance will be consulted on wider arrangements for risk management.

The Joint CFO leads on the Annual Governance Statement (AGS) for both organisations that includes an action plan incorporating key strategic actions and is monitored by the Joint Audit Committee (JAC).

1.3 Supporting effective governance through development of corporate governance arrangements, risk management and reporting frameworks; and corporate decision making arrangements.

The Joint CFO leads (for both organisations) on the arrangements for ensuring a Code of Corporate Governance and an AGS is reviewed/prepared on an annual basis and is compliant with codes/guidance. The Joint CFO leads on the arrangements for external audit, internal audit and the JAC. This includes ensuring the internal audit plan incorporates audit work covering key corporate and financial risks.

Within the OPCC, the Joint CFO contributes to the arrangements for decision making and reporting as a member of the Commissioner's Executive Team.

Within the Constabulary, the Joint CFO contributes to the arrangements for decision making and reporting as a member of the Chief Officer Group.

1.4 Leading or contributing to change programmes including identifying service efficiencies and value for money opportunities.

The Joint CFO is a member of the Constabulary's Governance Board structure and the Collaborative Board, all of which operate as a forum to offer challenge and discuss change management proposals, efficiency and value for money. The Joint CFO leads on the scrutiny of all Constabulary investment proposals and the revenue and capital budgets providing challenge around the level of resource requirements and the assumptions made. This includes ensuring that discretionary investment decisions deliver a robust financial return or can demonstrate significant non-financial benefits.

The Joint CFO provides independent advice to both the Commissioner and Chief Constable on Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) value for money profiles.

1.5 Contributing to the development of partnerships in order to deliver objectives.

All significant partnership arrangements are approved by the Chief Officer Group and PCC. The Joint CFO is therefore afforded the opportunity to scrutinise and contribute to partnership arrangements, with particular emphasis on financial governance.

1.6 The PCC's and CC's CFO should consult and agree the arrangements for:

- Leading development of a medium term financial strategy and the annual budgeting process to ensure financial balance and a monitoring process to ensure its delivery.

Within the OPCC, the Joint CFO leads on the arrangements for developing the Commissioner's medium term financial forecasts, advising on the robustness of the budgets and in-year management of the overall budget. This includes arrangements for Constabulary funding.

Within the Constabulary, the Joint CFO leads on the arrangements for developing the Chief Constable's medium term financial forecasts, advising on the robustness of the budgets and in-year management of the overall budget.

The Joint CFO is supported in doing this by a shared financial services team lead by the Deputy CFO.

- Ensuring that there are sound medium and long term financial plans for both revenue and capital to support the development of PCC and CC plans and strategies and that these are subject to regular review to confirm the continuing relevance of assumptions used.

The medium term financial forecasts for revenue are projected over 4 years. The capital programme is developed over 10 years. The forecasts are reviewed in detail on an annual basis between October and February. Projections of formula funding income and other factors that may have a stepped impact on resources are re-modelled at the time of government announcements.

- Ensuring that advice is provided on the levels of reserves and balances in line with good practice guidance.

The Joint CFO produces an annual policy on reserves that sets out the reason for holding reserves and the amount of reserves set aside for specific purposes. This is recommended for approval annually as part of the Commissioner's budget process. The Joint CFO will make a formal statement on the level of reserves within the statutory 151 report on the robustness of the budget.

Under the funding arrangement with the Police and Crime Commissioner the only reserve held by the Chief Constable is an operational contingency. The circumstances when this can be utilised are set out in the funding arrangement. If the Chief Constable is granted more reserves to manage in his own right, the Joint CFO will produce a Constabulary Reserve Policy. The Joint CFO advises the Chief Constable on the level and policy in relation to reserves held by the Commissioner.

- Ensuring compliance with relevant CIPFA Codes including the Prudential Framework for Local Authority Capital Finance and CIPFA's Treasury Management Code of Practice.

The Joint CFO makes an annual statement to the external auditors as part of the separate letters of representation provided on behalf of the Commissioner and Chief Constable in respect of compliance with relevant CIPFA codes. The Commissioner's Treasury Management Strategy confirms compliance with CIPFA's Treasury Management Codes and the prudential regime for capital financing. The requirement to comply with relevant codes is re-enforced through internal governance documents e.g. financial regulations, and is included with individual job roles for staff within the finance team. There is a level of independent assurance on Code compliance, e.g. external treasury management advisors will offer advice on the treasury management strategy/external audit will monitor compliance with the code on local authority accounting/internal audit will provide advice as appropriate to specific audits.

➤ **Ensuring that budget calculations are robust and reserves adequate, as required by s25 of the Local Government Act 2003, and in line with CIPFA guidance.**

The Joint CFO will develop the policy on reserves annually including setting the level of reserves. This includes a review of the requirement for the reserve and the adequacy of overall reserves given the financial risks faced by the OPCC/Constabulary.

The substantial proportion of the Commissioner's budget comprises funding for the Constabulary. Within the Constabulary, arrangements for the budget include a number of analytical review checks made by the Joint CFO prior to the Constabulary budget being submitted to the PCC for consideration. Within the OPCC, the Joint CFO will then undertake a further level of analytical review assessing the differences in funding between years against known changes to costs and other planning assumptions. A more detailed comparison is undertaken by the Deputy CFO for the purposes of presenting information to the PCP, further contributing to the level of assessment.

Reserves are set at a level to mitigate areas of budget risk. Those areas where risks are highest and only a lower level of assurance can be given are highlighted in the S151 report.

➤ **Ensuring the medium term financial strategy reflects joint planning with partners and other stakeholders.**

The Medium Term Financial Strategy is the end result of work between the Joint CFO and Deputy CFO to consider the requirements of the Constabulary and the Commissioner, including the Commissioner's wider partnership commissioning intentions that incorporates joint working with health, the county council, district councils and community safety partnerships.

Principle 2 - The CFO must be actively involved in, and able to bring influence to bear on, all material business decisions (subject to the operational responsibilities of the Chief Constable) to ensure immediate and longer term implications, opportunities and risks are fully considered, and align with the overall financial strategy.

Responsibility for Financial Strategy

2.1 Ensuring that a financial framework and planning delivery against the defined strategic and operational criteria.

The Joint CFO agrees the financial strategy within the Constabulary prior to submitting budget proposals to the Commissioner. The strategy is developed over a number of months taking account of change management proposals, investment decisions and aligned to workforce plans, capital strategies and asset management plans. Discussions will take place between the Joint CFO and Constabulary service leads on the strategic and operational requirements that drive the overall resource requirements e.g. discussions with Head of Estates and Fleet/ mobile and digital leads. Joint agreement is reached on the approach to risk within the budget and financing choices in respect of capital.

2.2 Maintaining a long term financial strategy to underpin PCC and CC financial viability within the agreed performance framework.

The Constabulary budget proposal is consolidated with the Commissioner's budget and a strategy agreed with the Joint CFO. The financial strategy drives the Constabulary and OPCC change management programme and is based on 4 years (revenue) and 10 years (capital). The change programme develops proposals well in advance of the savings requirement for any single financial year to ensure financial viability typically for up to 2 years. A funding arrangement between the Commissioner and Constabulary sets out the basis on which funding can be used and the expectations of the Commissioner in respect of financial management and governance. The agreement includes information requirements and an agreed performance framework. The Joint CFO advises on the adequacy and provides scrutiny of the change programme.

2.3 Implementing financial management policies underpin sustainable long-term financial health and reviewing performance against them.

The main financial management policies are for Treasury Management and Reserves. These are developed with a view to providing a balance between risk and prudence. The approach to treasury management is developed in conjunction with external advisors and includes benchmarked information regarding the balance of financial return and risk on investments. Quarterly reports on treasury management activity provide assurance that prudential

indicators have been complied with and that transactions have been carried out in line with strategy. The policy on reserves takes account of CIPFA guidance. The statement of accounts contain the financial policies used in respect of financial reporting and these are subject to annual review by the Joint CFO and Deputy CFO. The comments of the external auditors on financial resilience are taken into consideration by the Joint CFO when considering financial strategy. The capital programme is developed over a 10 year time line with a requirement that the first four years are fully funded.

2.4 Ensuring that alternative delivery models, commercial and collaborated opportunities are appraised and advising on financial targets and successful delivery.

The primary commercial and collaborative opportunities are in respect of the Constabulary. All significant collaborative arrangements involving the Constabulary are subject to scrutiny by the Joint CFO. The wider remit of the Commissioner which encompasses victims, provides an increased level of commissioning. Some smaller collaborative/commercial arrangements exist within the OPCC, e.g. internal audit shared service. Collaborative arrangements between the Constabulary and OPCC provide for shared support services. Collaboration arrangements and major commercial procurements are subject to approval from the Commissioner and will be subject to scrutiny and challenge by the Joint CFO.

2.5 Ensuring that an effective resource allocation model is developed and maintained to deliver business priorities.

The process for resource allocation is based on initially producing a continuation budget against estimates of the available level of resources. Growth and savings requirements are then considered to ensure overall balance. The on-going requirement for savings means effectively that the change management programme determines any stepped changes in resource allocation other than in respect of investments that provide an overall net return or are mandated. The Constabulary also undertakes an annual resource allocation review of officer deployment within the agreed establishment, on which the Joint CFO is consulted. Change management proposals are based on value for money considerations using HMICFRS profiles and take account of the priorities within the police and crime plan. The Joint CFO will scrutinise discretionary investment decisions to ensure a positive return on investment (ROI) as part of the budget process and under delegations from the Commissioner for the capital programme.

Within the OPCC, the Joint CFO/Commissioner will be consulted on the approach to any proposals with an impact on strategic priorities as part of the discussions on the budget and constabulary funding.

Within the Constabulary, the Joint CFO/Chief Constable will be consulted on the approach to any proposals with an impact on strategic priorities as part of the discussions on the budget and constabulary funding.

2.6 Taking a leading role on asset and balance sheet management.

Within the OPCC and Constabulary, governance arrangements delegate responsibility to the Joint CFO for balance sheet and asset management.

Within the OPCC, the Joint CFO leads on behalf of the Chief Executive in respect of securing effective management of the Commissioner's estate. The Joint CFO meets with the Head of Estate and Fleet to discuss and informally agree the approach to asset management strategy ahead of formal budget decision making and development of the capital programme. Discussions take account of operational requirements and value for money.

Within the Constabulary, the Joint CFO liaises closely with strategic leads in the development of Constabulary managed business and asset plans. Discussions take account of operational requirements, affordability and value for money.

The Joint CFO ensures assets are properly insured.

The Joint CFO leads on the arrangements for financial regulations that set out requirements in respect of asset and balance sheet management within the OPCC and Constabulary.

2.7 Co-ordinating the planning and budgeting processes

Within the OPCC the planning cycle is aligned to development of the police and crime plan. Consultation on the plan and the budget through the Police and Crime Panel is undertaken between October and January prior to approval in February. The financial implications of the Police and Crime Plan are set out in a multi-year commissioning strategy with the funding requirements mirrored in an aligned commissioning budget.

Within the Constabulary the planning cycle is aligned to the budget and that of the OPCC and as such coincides with the development of the police and crime plan as set out above.

2.8 Maintaining investment in strategic asset management

The Joint CFO works closely with business leads responsible for assets such as estates, fleet and ICT to ensure that business planning with respect to these strategic assets is considered as part of the budget and MTF setting processes.

Influencing decision making

2.9 Ensuring that opportunities and risks are fully considered and decisions are aligned with the overall financial strategy.

The Joint CFO attends the key strategic boards within the OPCC and Constabulary: Executive Team, Chief Officer Group, Collaborative Board, Constabulary Governance Boards and specific project boards e.g. mobile and digital/ESN, Eden Deployment Centre. Informal meetings outside the boards with project leads are held as necessary to discuss any specific delivery risks/financial implications that require more in depth consideration.

2.10 Providing professional advice and objective financial analysis enabling decision makers to take timely and informed business decisions.

Within the OPCC, the Joint CFO will provide the Commissioner with independent financial analysis where required and provides input to the process for decision making and through formal and informal briefing sessions. Delegations to the Joint CFO are made where decisions are taken in principle but further analysis is required.

Within the Constabulary, the Joint CFO will provide the Chief Constable with independent financial analysis where required and provides input to decision making through the Chief Officer Group and informal briefing sessions prior to the Chief Officer Group. Delegations to the Joint CFO are made where decisions are taken in principle but further analysis is required.

Under the revised arrangements for a shared Chief Finance Officer between the two organisations it has been determined that if a conflict arises in relation to the provision of independent financial advice, that the Joint CFO will advise the Commissioner and the Deputy CFO will advise the Chief Constable.

2.11 Ensuring that efficient arrangements are in place and sufficient resources available to provide accurate, complete and timely advice to support strategy development.

The overall resources for the shared financial support team are considered on a regular basis to ensure the support needs of both businesses are met. The statutory responsibility of the Joint CFO to advise on this is set out in the arrangements for governance.

2.12 Ensuring that clear, timely, accurate information is provided as requested by the Police and Crime Panel.

The panel are consulted on their information requirements in respect of the precept decision each year and are offered an annual seminar supported by the Constabulary to consider more detailed financial, performance and

value for money information. The panel are provided with financial monitoring information during the financial year in respect of Constabulary and OPCC budgets.

2.13 Ensuring that all necessary information is provided to the PCC when the Police and Crime Panel considers the budget and proposed precept.

The Commissioner and Chief Constable are fully briefed ahead of the Police and Crime Panel precept meeting on the key issues regarding the council tax debate. The Joint CFO presents the budget papers to the panel and will answer technical questions. The Chief Constable is normally in attendance to respond on questions regarding the operational implications of resource constraints.

2.14 Ensuring that capital projects are chosen after evaluating a fully costed business case compiled with input from all relevant professional disciplines and can be funded in the financial strategy.

The financial strategy requires the capital programme to be balanced for a minimum of 4 years. Schemes included within the programme are either supported by asset management strategies that provide the rationale for cyclical replacement/maintenance programmes or require a business case to commence. Professional oversight is provided as appropriate to business case decisions.

2.15 Checking, at an early stage, that innovative financial approaches comply with regulatory requirements.

The Joint CFO procures a range of specialist financial advisory services including treasury management, taxation including VAT/PAYE, pensions and insurance. This provides access to independent advisory services where more innovative approaches are being considered. Both organisations also work closely with the external auditors on compliance issues and liaise at the early stages of considering any changes to ways of accounting and financing transactions.

Financial information for decision makers

2.16 Monitoring and reporting on financial performance linked to related performance information and strategic objectives that identifies any necessary corrective decisions.

Within the OPCC financial monitoring is undertaken on a monthly basis with formal reporting on a quarterly basis to the Public Accountability Conference (Constabulary Reports) and briefing sessions (OPCC reports). The Police and Crime Panel meet five times a year and receives **a quarterly financial update at the relevant meeting**. The Commissioner's monitoring reports include detail of schemes and expenditure with partners and third sector organisations aligned to the commissioning strategy and police and crime plan priorities.

Within the Constabulary financial monitoring is undertaken on a monthly basis with formal reporting to Chief Officers at a high level on a monthly basis and at a more detailed level on a quarterly basis. As set out above, the Constabulary also provides reports on a quarterly basis to the Public Accountability Conference and Police and Crime Panel.

Regular discussions are held with the Joint CFO and Deputy CFO in order to ensure the on-going management of the budget in year and to minimise the impact of variances.

The funding arrangement between the Commissioner and Chief Constable includes a schedule of information requirements and the performance monitoring framework for the financial year.

2.17 Ensuring that timely management accounts are prepared.

Management accounts are prepared on a monthly basis typically within 14 days of the period end.

2.18 Ensuring the reporting envelope reflects partnerships and other arrangements to give an overall picture.

The Commissioner's financial reports detail all partnership expenditure. The Commissioned Services budget is included as a separate line on the monitoring report with a link to further information on the Commissioner's website detailing all grant expenditure.

The Constabulary financial reports incorporate all partnership and collaboration activity. Where partnership activities have significant financial implications these are highlighted within Constabulary reports or are reported separately.

2.19 Monitoring the service impact of third-party contracts on the delivery of organisational objectives.

The Joint CFO is a member of the Contract Awards Board which scrutinises the letting of third party contracts and is able to input to such contracts in terms of the procurement process, financial implications and value for money. The Joint CFO, as part of the PCC Executive Team, is also sighted on significant commissioning activities and performance framework.

2.20 Monitoring the longer-term financial impact of third-party contracts.

Through the triangulation of business plans, participation in the work of the Contracts Awards Board and the budget and MTF setting processes, the Joint CFO and finance team are able to monitor and model the impact of third party contracts on the financial position and highlight any trends.

Principle 3 - The Chief Finance Officer must lead and encourage the promotion and delivery of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently, and effectively.

Promotion of financial management

3.1 Assessing financial management style and the improvements needed to ensure it aligns with the PCC's strategic direction.

Within the OPCC collective responsibility for financial management is set out in job roles from the Chief Executive through to specific budget holders. Financial Services Officers have also attended full OPCC team meetings to brief staff on their role and to improve understanding of when to engage financial support in new/developing areas of business. Close relationships are promoted between the Financial Services Officer and individual budget holders to ensure ownership of the budgets. The financial planning cycle ensures alignment between the OPCC budget, commissioning budgets, the police and crime plan priorities and constabulary requirements.

Within the Constabulary collective responsibility for financial management is promoted through Chief Officer Group, and individual senior leadership team meetings (SLTs) where the budget is a standing agenda item. Financial Services Officers are an integral part of these SLT meetings to brief staff on their role and to improve understanding of when to engage financial support in new/developing areas of business. Closer relationships have been promoted between financial services staff and individual budget holders to ensure ownership of the budgets. The financial planning cycle ensures alignment between the Constabulary budget, change programme, police and crime plan priorities and the wider Commissioner's budget requirements. The introduction of cost centre management as part of the migration to the Oracle Fusion system is a step towards encouraging greater budget holder accountability.

3.2 Actively promoting financial literacy.

The Joint CFO has previously supported the procurement of CIPFA training that will enhance financial and business skills across the OPCC and Constabulary. The arrangements for financial governance ensure all key documents that support financial literacy are developed as far as is possible with a view to their accessibility to staff. As part of the Constabulary's involvement in the Achieving Financial Excellence in Policing initiative bespoke training is to be developed for budget holders and will be rolled out in 2022 with a programme of internally delivered refresher training when budget holders change.

3.3 Actively promoting good financial management throughout all partnerships and alternative delivery models.

Significant partnerships require a business case and approval from the Chief Officer Group and PCC. This provides opportunity for the Joint CFO and wider finance team to have oversight of financial arrangements of the partnership and specific scrutiny of the Constabulary / PCC resource input, governance arrangements and value for money.

3.4 Assisting the development of a protocol which clearly sets out the roles and responsibilities for financial management, including delegated authority/powers.

The Joint CFO oversees the development of the financial regulations and joint procurement regulations that set out the responsibilities and role of key individuals including Chief Officers within the OPCC and Constabulary.

Within the OPCC, the Joint CFO also inputs into the development of the existing OPCC scheme of delegation that documents all delegations from the Commissioner and Chief Executive and general principles of delegation.

Within the Constabulary, the Joint CFO has lead responsibility for the financial rules and financial handbook which underpin the financial regulations. The Joint CFO in conjunction with the Director of Legal Services has also led on the development of the existing Constabulary scheme of delegation that documents all delegations from the Chief Constable and general principles of delegation. The Joint CFO also leads on the production of annual budget protocols which set out the roles and responsibilities of budget holders and wider Constabulary in relation to financial transactions.

3.5 Ensuring effective oversight of partnerships through monitoring and access to information.

The Joint CFO is able to monitor partnership arrangements through scrutiny of business cases and subsequent budget monitoring. The focus is specifically on Constabulary / PCC financial inputs and performance through the wider governance processes of the Constabulary and PCC.

Value for money

3.6 Challenging and supporting decision makers, especially on affordability and value for money, by ensuring policy and operational proposals with financial and (as appropriate) non-financial implications are notified to and signed off by the finance function.

Within the OPCC, the Joint CFO will scrutinise all reports presented for decision to the Commissioner with financial implications (other than those operating with approved budgets), and advise on the acceptability of recommendations. Where decisions are able to be made in principle, but appropriate detail or assurance regarding financial implications are unable to be confirmed, final decision making is delegated to the Joint CFO.

Within the Constabulary, the Joint CFO will scrutinise all reports presented for decision to the Chief Constable and advise on the financial implications/acceptability of recommendations.

The Joint CFO works closely with the shared financial services team to ensure financial implications have been reviewed and where appropriate are reflected in a revised budget.

3.7 Ensuring that the reasons for selection of proposals that do not represent the most affordable solution or the best value for money are clearly justified and recorded.

As a member of the Chief Officer Group and PCC Executive Team the Joint CFO is able to influence business proposals and comment upon the validity of justifications where a proposal does not represent the most affordable solution or best value for money.

3.8 Advising on the financial thresholds for 'key' decisions.

The Joint CFO through leading on financial regulations and the scheme of delegation and being a consultee on other key governance documents such as arrangements for fraud and anti-corruption and joint procurement regulations is able to influence financial thresholds for key decisions.

3.9 Ensuring that appropriate asset management and procurement strategies are developed and maintained

The Joint CFO is the lead for asset management and procurement for both the Commissioner and Constabulary. The Joint CFO leads on and works collaboratively with the Constabulary developing the joint procurement regulations (overarching document including strategy/policy, rules procedures). Asset management strategies are presented by the Constabulary as part of the budget setting process and will be discussed and reviewed by the Joint CFO prior to presenting to the Commissioner for approval as part of the annual budget process.

3.10 Managing long-term commercial contract values.

The Joint CFO as a part of the Contracts Awards Board and wider financial input into the contract awards process facilitates the effective management of long-term commercial contract values.

3.11 Taking a leading role in the evaluation of future value for money opportunities.

The Joint CFO annually reviews HMICFRS VFM profiles and other inspectorate reports to identify areas where value for money can be improved for both organisations.

The Joint CFO's understanding of Constabulary VFM supports the Commissioner in providing challenge and ensures effective judgements can be made on the change programme strategy for reducing costs.

Within the Constabulary, further detailed work has been undertaken to benchmark Constabulary costs with statistical neighbours to identify opportunities to reduce the budget. The Joint CFO's understanding of Constabulary VFM supports the Chief Constable in providing challenge and ensures effective judgements can be made on the change programme strategy for reducing costs. The Public Accountability Conference receives a regular report from the Constabulary on its VFM strategy.

Safeguarding public money

3.12 Applying strong internal controls in all areas of financial management, financial risk management and asset control.

The Joint CFO leads on the Commissioner's financial regulations and financial rules.

The financial regulations are owned by the OPCC and are adopted by the Constabulary. The financial rules are owned by the Constabulary and are adopted by the OPCC.

3.13 Explain the financial management arrangements within the Annual Governance Statement.

The Annual Governance Statement and Code of Corporate Governance set out the arrangements for financial management.

3.14 Establishing budgets, financial targets and performance indicators to help assess delivery.

Within the OPCC, the Joint CFO leads on the development of an annual funding arrangement between the Commissioner and Chief Constable that sets out the financial management arrangements for Constabulary funding. This is accompanied by an annually agreed performance framework. Grant regulations within the OPCC ensure any grant based funding has performance/outcome based measures attached and/or an evaluation report to assess the impact of delivery.

Within the Constabulary, the Joint CFO leads on the development of an annual budget and medium term financial forecast for the Constabulary. Performance within the Constabulary, which includes financial performance, is examined in periodic individual command or directorate performance development conferences. The budget setting process includes zero based budgeting exercises carried out by the financial services team and budget holders are held to account for financial performance and budget requirements in annual budget star chambers. The funding arrangement between the Commissioner and Chief Constable that sets out the financial management arrangements for Constabulary funding and an agreed performance framework.

3.15 Ensuring that effective systems of internal control are implemented. These may include financial regulations, contract regulations, standing financial instructions, operating manuals, and compliance with codes of practice to secure probity.

The Joint CFO leads on the Commissioner's financial regulations - these are adopted by the Constabulary. The OPCC adopts the financial rules which are produced by the Constabulary and are also led on by the Joint CFO. Financial rules are supported by a finance handbook and procedures. Internal audit will assess compliance as part of the cyclical audit of internal control and provide a judgement on the control environment. Job roles for finance posts include responsibility for ensuring compliance with codes.

3.16 Ensuring that the PCC and CC have put in place effective arrangements for internal audit of the control environment and systems of internal control as required by professional standards and in line with CIPFA's Code of Practice [on Local Authority Accounting in the United Kingdom](#).

Shared Internal audit arrangements are in place and reviewed annually by the Joint CFO including compliance with CIPFA's code of practice and the Public Sector Internal Audit Standard.

3.17 Ensuring that delegated financial authorities are respected

The Deputy CFO has a highly robust understanding of delegations as set out in the funding arrangement between the Commissioner and Chief Constable and financial regulations and acts as a 'gate keeper' for financial delegations on behalf of the Joint CFO in respect of decision making and virement/budgets.

3.18 Promoting arrangements to identify and manage business risks (except for operational responsibilities of the Chief Constable), including safeguarding assets, risk mitigation and insurance.

The Joint CFO leads on the funding arrangement between the Commissioner and Chief Constable. The terms of funding include the responsibility of the Chief Constable in respect of managing business risk and insurance and safeguarding assets. The financial regulations has a specific section covering assets and the responsibilities of officers, which are re-enforced by budget protocols (which sit alongside the financial regulations and financial rules) within the Constabulary. The Joint CFO is consulted and plays an active part in the development of strategic risk registers with particular emphasis on financial risks.

3.19 Ensure that capital projects are managed with post completion reviews.

Where capital schemes are subject to a business case (largely ICT schemes) the project manager will produce a final project report reviewing the scheme and lessons learned. Work is ongoing to improve benefits realisation processes within the Constabulary.

3.20 Securing the application of appropriate discipline in financial management, including managing cash and banking, treasury management, debt and cash flow, with appropriate segregation of duties.

Financial management disciplines are set out in the financial regulations, rules and handbook supported by appropriate procedures and the treasury management statements of practice. These areas are subject to audit and a range of treasury management/other performance indicators. Segregation of duties operates within financial administrative procedures within the finance team and between the finance team and central services department who process a number of these transactions. Insurance arrangements provide some additional level of cover for any areas of risk.

3.21 The PCC's CFO should ensure, in consultation with the CC's CFO, the effective management of cash flows, borrowing and investments of funds including those on behalf of others; ensuring the effective management of associated risks; and pursuing optimum performance or return consistent with those risks.

The arrangements are set out in the treasury management strategy and practices statements. The Commissioner is responsible for Treasury Management and this function is managed by the Joint CFO supported by the Deputy CFO and the wider finance team. This area is subject to independent advice from treasury management specialist in addition to internal audit. The strategy and practices are reviewed by JASC annually who also receive reports on treasury management activity and compliance with performance indicators and the control framework.

3.22 Ensuring that appropriate measures exist to prevent and detect fraud and corruption.

The OPCC has arrangements for anti-fraud and corruption including a strategy, policy, procedures and a fraud plan. Further work has been undertaken to promote whistleblowing following feedback from JAC.

The Constabulary has arrangements for anti-fraud and corruption including a strategy, policy, procedures and an annual fraud risk assessment. Further work has been undertaken to promote whistleblowing following feedback from JAC.

The Joint CFO is made aware of any instances of fraud where they arise and will review and discuss with internal audit any implications for internal control. The Constabulary takes part in the national fraud initiative. Instances of fraud and the action taken are reported to the external auditors.

3.23 Ensuring that proportionate business continuity arrangements are established for financial processes and information.

The financial team have a business continuity plan which provides details of financial procedures to be adopted in the event of a business continuity event. The plan has been developed in consideration of a number of potential

scenarios (principally loss of buildings, power, ICT or staff). The Joint CFO and wider finance team all have laptop devices, and this has facilitated agile working throughout the covid-19 pandemic.

3.24 Ensuring that any partnership arrangements are underpinned by clear and well documented internal controls.

Within the OPCC, partnership arrangements involving funding are subject to a funding or grant agreement that stipulates requirements in respect of financial management and reserves the right of the Commissioner to subject those arrangements to audit.

Partnership arrangements involving the Constabulary are subject to governance arrangements appropriate to their size and risk as stipulated in the Financial Regulations and Rules.

3.25 Being alert to potential conflicts of interest and ensuring appropriate independent advice is available. Having adopted a joint CFO arrangement for both the PCC and Chief Constable, the Joint CFO is aware of potential conflicts of interest and a protocol is in place to manage this eventuality.

Assurance and security

3.26 Ensuring that financial performance of the PCC and CC and its partnerships is reported to the PCC and CC and other parties as required.

The funding arrangement between the Commissioner and Chief Constable and financial regulations set out the requirements in respect of financial monitoring. Cyclical Reports are presented to the Chief Officer Group, Public Accountability Conference and Police and Crime Panel.

3.27 Ensuring that financial and performance information presented to members of the public, the community and the media covering resources, financial strategy, service plans, targets and performance, is accurate, clear, relevant, robust and objective.

The financial information in reports is reconciled to the position on the financial system. Staff producing reports are fully aware of the challenges in making financial reporting publicly accessible and work hard to ensure reports present information in accessible formats e.g. treasury management reporting makes frequent use of graphs and charts to explain the arrangements. Annual budget information presented to the police and crime panel makes use of supporting contextual data, graphs and pictures to enhance the narrative and figures. OPCC budget monitoring reports provide additional information on the purpose of grant funds and the organisations receiving grants in response to this being an area of interest for the panel.

3.28 Supporting and advising the Joint Audit Committee.

The Joint CFO provides support to the Deputy CFO who leads on the arrangements for the JAC providing support/advice as necessary and producing the annual report on behalf of the Committee. The arrangements for the Committee provide for independent meetings with the external and internal auditors which provides a further opportunity for members to access support. Members agree an annual programme of development sessions and corporate updates. Arrangements provide that members can request training seminars at the start of committee meetings.

3.29 Ensuring that clear, timely, accurate advice is provided on the considerations which can legitimately influence decisions on the allocation of resources.

The Joint CFO works closely with the Deputy CFO in developing the annual budget and medium term forecasts including discussions on resource allocations. The Joint CFO will brief the Commissioner and Chief Constable as appropriate on any principles that underpin assessments of levels of reserves, the approach to constabulary funding and any issues with resource implications outside the on-going continuity budget prior to developing final reports for formal approval. The funding arrangement between the Commissioner and Chief Constable sets out the discretions available to the Chief Constable for in year resource allocation.

3.30 Ensuring that published budgets, annual accounts and consolidation data for government level consolidated accounts are prepared.

The Deputy CFO, on behalf of the Joint CFO ensures the publication of budget/monitoring information, including treasury management strategy and activity reports on the Commissioner's website within a dedicated budget and finance page. The Joint CFO also ensures that a separate page, which sets out the statement of accounts and associated governance statements and includes a copy of the audit commission's document advising the public on their rights regarding information on the accounts and audit, is maintained and up to date. The shared financial services team under the direction of the Deputy CFO ensures government returns including the WGA are complete and submitted to the relevant government department.

3.31 Ensuring that the financial Statements are prepared on a timely basis, meet the requirements of the law, financial reporting standards and professional standards as reflected in the Code of Practice on Local Authority Accounting in the United Kingdom developed by the CIPFA/LASAAC Joint Committee.

The Joint CFO provides separately an annual letter of representation to the external auditors on behalf of the Commissioner and Chief Constable confirming all required standards have been met in respect of the published statement of accounts.

Under The Accounts and Audit Regulations (2015) the date by which the Chief Constable and Commissioner are required to publish the draft (subject to audit) statement of accounts has been brought forward to 31 May (previously 30 June) and the required date to publish the final (audited) statement of accounts has been brought forward to 31 July (previously 30 September). The requirement for these accelerated dates came into effect for the statement of accounts for the 2017/18 financial year. As a result of the covid-19 pandemic, the statutory timescales have been amended for the financial years of accounts 2019/20, 2020/21 and 2021/22. The deadlines for 2020/21 and 2021/22 have been amended to 31 July for the unaudited statements and 30 September for the audited statements.

The financial services team achieved these tighter deadlines for two years in advance of the statutory requirement and during the covid pandemic were able to prepare and publish the draft subject to audit statements by the end of June, a month ahead of the revised deadline.

3.32 Certifying the annual Statement of Accounts (PCC's CFO and CC's CFO for their separate accounts) and the group accounts (PCC's CFO).

The Joint CFO certifies the annual statement of accounts for the PCC/Group and the single entity accounts for the Chief Constable.

3.33 Ensuring that arrangements are in place so that other accounts and grant claims (including those where the PCC is the accountable body for community led projects) meet the requirements of the law and of other partner organisations and meet the relevant terms and conditions of schemes.

The shared financial services team lead on ensuring the requirements of grant claims are adhered to and will liaise directly with the relevant government department where needed to ensure requirements are fully understood. Where funded expenditure is being managed by a partner the arrangements include a funding or grant agreement with terms consistent with those issued from the relevant government department. Legal support is accessed as appropriate regarding terms and conditions of agreements.

3.34 Liaising with the internal and external auditor and to assist in the fulfilment of their responsibilities.

The Joint CFO leads on the arrangements for audit for both the OPCC and Constabulary and will meet with the external auditors at the start and close out meetings for the accounts and periodically during the audit process to discuss any issues. The Joint CFO meets regularly with the internal auditors to discuss audit planning and as part of the shared audit service management board. The internal and external auditors and Joint CFO attend all meetings of the JAC.

Principle 4 - The CFO must lead and direct a finance function that is resourced to be fit for purpose.

4.1 Ensuring that the finance function makes a full contribution to and meets the needs of the business.

The finance function is a highly valued team and critical to ensuring the OPCC, Constabulary and Joint CFO can fulfil their statutory and professional responsibilities. The Deputy CFO leads the team and is fully engaged in the business of the OPCC and Constabulary, and works very closely with the Joint CFO on ensuring the delivery of financial support including a full suite of budget, monitoring and treasury reports and the financial statements in order that the Commissioner, Chief Constable and Joint CFO can demonstrate public accountability for its funding.

4.2 Ensuring that the resources, expertise and systems for the finance function are sufficient to meet business needs and negotiating these within the overall financial framework.

The resources within the finance function are regularly assessed to ensure a balance between meeting the needs of the business and cost. Resources between the two entities were reduced overall in 2017 when the decision to move to a shared Joint CFO was made. The changes resulted in a restructure of the finance team which led to a 0.6 FTE increase in the Financial Services Officer Role and the replacement of a 0.60 FTE Financial Services Assistant with a full time Financial Services Trainee/Apprentice. The revised financial services structure has now been in place for over three years and demands on the team and work pressures remain high. In March 2021, an additional 1.6 FTE Financial Services Officer resources were approved with a commitment to review the establishment in 2-4 years with a view to returning to the previous establishment. The growth in the team was approved in response to increasing demands in terms of prolonged and increased external audit requirements, ongoing system implementation issues and the objective of ensuring continuous improvement in the main financial ledger system and recognition of work potentially required over the next 18 months as a result of Local Government Reorganisation in Cumbria. Financial Services resources at a senior level in the team are increasing stretched.

4.3 Contributing to partnership delivery.

Through, strategic oversight, financial scrutiny of business cases and on-going financial monitoring the Joint CFO and wider finance team are able to contribute towards the successful delivery of partnership working.

4.4 Ensuring that robust processes for recruitment of finance staff are implemented and/or outsourcing of functions.

The Joint CFO and Deputy CFO will jointly consider resources and the recruitment of senior posts within the finance team. The finance team were subject to a mini restructure in April 2017 when the decision was made for the Commissioner and Chief Constable to share a Chief Finance Officer. The Joint CFO and Deputy CFO have jointly developed the role descriptions and person specifications for all posts. There is currently no formal outsourcing of

finance functions. Specialist advisory services are subject to procurement processes in line with procurement regulations. Internal audit is currently provided through a County Council shared service with a management board attended by the Joint CFO. **From April 2022, the contract will move to an outsourced firm TIAA Ltd.**

4.5 Reviewing the performance of the finance function and ensuring that the services provided are in line with the expectations and needs of its stakeholders.

The Joint CFO is the primary stakeholder for the finance function under the shared service arrangements. The Joint CFO works closely with the Deputy CFO, Financial Services Managers and other members of the team to communicate requirements and ensure the team is able to deliver. The team has an excellent track record of providing a qualitative and response service to the OPCC and Constabulary.

4.6 Seeking continuous improvement in the finance function.

The Joint CFO has worked with the Deputy CFO to develop and fund a training and development policy for the finance function to incorporate an enhanced level of professional training. Staff are encouraged to attend regional and national seminars and events. This learning supports staff in improving the systems and processes for which they are responsible.

4.7 Ensuring that finance staff, managers and the Leadership Team are equipped with the financial competencies and expertise needed to manage the business both currently and, in the future, whether directly or indirectly employed.

The Joint CFO has worked with the Deputy CFO to develop and fund a training and development policy for the finance function, **the team is currently supporting one CIPFA apprentice and two AAT apprenticeships.** In addition, the team members have undertaken risk management awareness training, treasury management training, VAT training **and training on the new Oracle Fusion financial system.** As part of the participation in the Cumbria Wide Accountancy Group (CWAG) CIPFA training has previously **undertaken locally at HQ premises or other LA premises with costs being shared between attendee bodies, the covid-19 pandemic has meant that this shared face to face training has not been possible in the last year.** The majority of CIPFA development sessions has moved to online delivery, and as part of the CIPFA Achieving Financial Excellence in Policing Programme the PCC/CC have access to a number of subscription places on professional development and technical update events per year. The Joint CFO and Deputy CFO attend sessions as part of the CFO Leadership Academy, which is also part of the AFEP Programme.

4.8 Ensuring that responsibility for all finance staff is properly discharged.

The Joint CFO has direct staff responsibility for the Deputy CFO and works closely with the Deputy CFO to ensure responsibility for staff within the finance function is properly discharged.

4.9 Acting as the final arbiter on application of professional standards.

Within both the OPCC and Constabulary, the Joint CFO has statutory responsibility for the administration of financial affairs and is a professional member of CIPFA. As the sole post holder within the OPCC and Chief Officer Team with a professional financial qualification, all financial responsibility including that for professional standards rests with the Joint CFO.

Principle 5 - The CFO must be professionally qualified and suitably experienced.

5.1 In order to fulfil the aims of this Principle, the CFO must:

- Be a member of an accountancy body recognised by the International Federation of Accountants (IFAC), qualified through examination, and subject to oversight by a professional body that upholds professional standards and exercises disciplinary powers.
- Adhere to international standards set by IFAC on: Ethics and Continuing Professional Development.
- Demonstrate IT literacy.
- Have relevant prior experience of financial management in the public services or equivalent.
- Understand public service finance and its regulatory environment.
- Apply the principles of public financial management.
- Apply relevant commercial skills and understanding to alternative delivery methods.
- Understand personal and professional strengths.
- Undertake appropriate development or obtain relevant experience in order to meet the requirements of the non-financial areas of the role.

In April 2017, the decision was taken by the Commissioner and Chief Constable that the role of Statutory Chief Finance Officer (S151 Officer) would be performed by a shared post between the organisations. In May 2017, Roger Marshall was appointed to this new shared position.

The Joint CFO, Roger Marshall is a full member of CIPFA and adheres to the requirements of that professional body including those for ethics and CPD.

Roger is literate in the use of relevant office ICT systems (Microsoft Office) and has mobile access to office ICT.

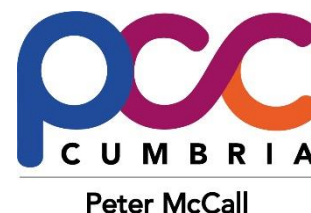
Roger has relevant experience which includes a number of senior finance roles within the corporate finance department of a county council and several years fulfilling the roles of Head of Financial Services and Chief Finance Officer for the Constabulary. Specific accountabilities have included consolidating statutory accounts, producing multi service revenue budgets, capital strategy and medium term financial forecasts and treasury management.

The range of roles performed by Roger has led to the development of a robust understanding of public service finance/regulatory requirements. More recently this has included the changes in legislation and regulations arising from the introduction of the police and crime commissioner including the Police Reform and Social Responsibility Act 2011, the policing protocol order 2011, relevant aspects of the Anti-social Behaviour, Crime and Policing Act 2014 and the changes to financial legislation arising from the Local Audit and Accountability Act 2014.

Roger ensures that the principles of corporate finance, economics, risk management and accounting are applied through leading on robust standards of financial governance that are subject to review by an independent audit committee and internal and external audit.

Roger undertakes relevant training to ensure that his knowledge is updated on a continuous basis in order to fulfil the Joint CFO role effectively.

Joint Audit Committee



Title: OPCC Anti-Fraud & Corruption Procedures Review

Date: 3 November 2021

Agenda Item No: 13c

Originating Officer: Joanne Head, Governance Manager

CC:

1. Introduction & Background

- 1.1 The Office of the Police and Crime Commissioners (OPCC) overall framework of controls, policies and systems and processes are in place to protect against fraud, legal challenge, provide standards of conduct, and ensure that the organisation is well governed.

2. Issues for Consideration

- 2.1 The **Anti-Fraud and Corruption Strategy and Procedure** supports the OPCC's good governance. This document supports the Policy and Procedure within financial regulations and provides a joint statement of intent from the Commissioner and Constabulary. It is to support confidential reporting requirements and ensure staff know how they can report any concerns. It also includes the key forms that must be completed by relevant staff for related party transactions, declaration of interests and the code of conduct undertaking.
- 2.4 This procedure and associated documents are subject to a fundamental review every 3 years to avoid all documents undergoing such a review in a single year. Any changes or amendments to the documents are planned to be presented to the Joint Audit Committee at its November meetings.

Recommendation:

That the committee notes the updated document at Appendix 1.



Cumbria Office of the Police and Crime Commissioner

COPCC Arrangements for Anti-Fraud and Corruption
2021-2024

Distribution and Consultation Record

Date	23 November 2012
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Policy Approval	
Approved By	Mr Richard Rhodes, Police & Crime Commissioner
Date	26 November 2012
Approved By	Mr Peter McCall, Police & Crime Commissioner
Date	November 2017

Name	Position	Version no. consulted on	Date
Stuart Edwards	Chief Executive	Version No 1	October 2012
Stuart Edwards	Chief Executive	Version No 2	November 2015
Vivian Stafford	Chief Executive	Version No 3	March 2018
Vivian Stafford	Chief Executive	Version No 4	October 2019
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Version Control

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Contents

Page

4. Anti-Fraud and Corruption Strategy

8. Cumbria Police and Crime Commissioner Anti-Fraud and Corruption Policy and Plan

15. Anti-Fraud and Corruption Procedure

23. Forms for declaration and registration of interests

Anti-Fraud and Corruption Strategy

ANTI FRAUD AND CORRUPTION STRATEGY

Introduction

This strategy sets out the approach that will be adopted by the Cumbria Office of the Police and Crime Commissioner (COPCC) to ensure effective procedures and responsibilities are in place to deliver the Anti-Fraud and Corruption Policy. This strategy and the related procedures set out how the commitments and principles within that document are put into practice.

To support the Policy appropriate resources will be committed to fraud and corruption prevention and detection. A series of interrelated procedures designed to frustrate any attempted fraudulent or corrupt act will be put in place by the COPCC and investigation of any instances or suspected instances of fraud and corruption which may arise will be undertaken in accordance with those procedures.

ANTI FRAUD AND CORRUPTION STRATEGY

Measures

The COPCC will maintain appropriate procedures and documentation to assure that staff in those organisations that we do business with are aware of the requirements of this strategy and related procedures.

The COPCC will maintain financial and other control measures, which will be subject to internal and external audit and scrutiny of its practices and their outcomes. It will co-operate with audit agencies in the legitimate pursuit of their interests and, in particular, it will maintain a Joint Audit Committee in partnership with the Constabulary to oversee the processes of audit of the COPCC business.

The Chief Executive is responsible, in consultation with the Joint Chief Finance Officer, for ensuring effective Arrangements for Anti-Fraud and Corruption are in place.

Staff of the COPCC are responsible for ensuring they adhere to the requirements of the Arrangements for Anti-Fraud and Corruption.

ANTI FRAUD AND CORRUPTION STRATEGY

Terms and Definitions

FRAUD

“Any intentional false representation, including failure to declare information or abuse of position that is carried out to make gain, cause loss or expose another to the risk of loss” (CIPFA)

CORRUPTION

In general, corruption is a form of dishonesty or criminal activity undertaken by a person or organisation entrusted with a position of authority, often to acquire illicit benefit for personal gain.

Corruption includes Abuse of Authority for Sexual Gain – AASG. This can be defined as “Any behaviour by a police officer or police staff member*, whether on or off duty, that takes advantage of their position as a member of the police service to misuse their position, authority or powers in order to pursue a sexual or improper emotional relationship with any member of the public”

THEFT

“The dishonest appropriation of property belonging to another with the intention of permanently depriving the other of it” (Theft Act 1968)

IRREGULARITY

“The violation or non-observance of established rules and practices”

ANTI FRAUD AND CORRUPTION STRATEGY

Detection and Investigation

The COPCC will always investigate any actual or suspected cases of fraud, corruption, theft or irregularity and implement misconduct procedures where appropriate. Specifically:

- Staff are required to report all suspected irregularities to the Commissioner’s Joint Chief Finance Officer (Joint CFO), who will instigate the necessary investigation.
- Misconduct Procedures will be used where the outcome of the investigation indicates improper behaviour.
- Where financial or other impropriety is discovered and sufficient evidence exists to suspect that a criminal offence may have been committed, the matter may be referred to the Police.

ANTI FRAUD AND CORRUPTION STRATEGY

Supporting the Strategy

External Bodies

The COPCC will co-operate with the following external bodies, whose prerogatives extend over the conduct of the COPCC business. The list is not exhaustive.

- Externally appointed auditors and the Public Sector Audit Appointments Ltd
- Independent Office of Police Conduct
- HM Revenue and Customs
- Department of Social Security/ Contributions Agency
- The Local Government Ombudsman

Internal Bodies

The internal bodies set out below each have a responsibility to ensure that the COPCC comply with their respective elements of their Anti-Fraud and Corruption Policy and Procedures:-

Joint Chief Finance Officer: The Commissioner must appoint a Chief Finance Officer who has statutory responsibility for the integrity of financial administration (including the legality of expenditure) and the provision of the Internal Audit function.

Monitoring Officer (Chief Executive to the Commissioner): This is the statutory officer whose role is to warn of illegality or maladministration, (whether actual or potential), in matters touching the business or responsibilities of the COPCC.

Internal (Management) Audit: Provided as part of a shared service agreement from Cumbria County Council, Internal (Management) Audit is responsible for compliance audits in respect of regularity and systems.

The Seven Principles of Public Life (Nolan Committee)

Selflessness

Holders of public office take decisions 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 influence them in their performance of the 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.

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.

All staff members of the COPCC are expected to comply with the principles of public life and the Arrangements for Anti-Fraud and Corruption. Failure to do so may result in disciplinary action.

Anti-Fraud and Corruption Policy and Plan

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Introduction

This statement has been prepared utilising the Chartered Institute of Public Finance and Accountancy (CIPFA) code of practice on managing the risk of fraud and corruption.

In administering its responsibilities in relation to fraud and corruption, whether it is attempted upon the OPCC or from within, the Commissioner is committed to an effective Anti-Fraud and Corruption policy designed to;

- encourage prevention
- promote detection; and
- identify a clear pathway for investigation

The expectation regarding propriety and accountability is that the Commissioner and staff at all levels will lead by example in ensuring adherence to rules, and that all procedures and practices are above reproach.

The Commissioner also demands that individuals and organisations that they come into contact with will act towards them with integrity and without thought or actions involving fraud or corruption.

This Anti-Fraud and Corruption policy is based on a series of comprehensive and inter-related procedures designed to frustrate any attempted fraudulent or corrupt act. These cover:-

- Culture (Section 2);
- Prevention (Section 3);
- Detection and Investigation (Section 4); and
- Training (Section 5)

The Commissioner is also aware of the high degree of external scrutiny of its affairs by a variety of bodies including:-

- Her Majesty's Inspector of Constabulary Fire and Rescue Service
- Internal and External Audit
- HM Revenue and Customs

- Inland Revenue
- The General Public
- Public Sector Audit Appointments Ltd
- National Audit Office
- Cumbria Police and Crime Panel

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Culture

The Commissioner is determined that the culture and tone of the organisation is one of honesty and opposition to fraud and corruption. To support this, the arrangements for Confidential Reporting (Whistleblowing) will be clearly signposted for staff and others within COPCC offices; and are available on the OPCC [website](#).

There is an expectation and requirement that all individuals and organisations associated in whatever way with the OPCC will act with integrity, and that the Commissioner and staff at all levels will lead by example in these matters.

The Commissioner and staff are important in the stance on fraud and corruption and they are positively encouraged to raise any concerns that they may have on these issues where they are associated with the activities of the OPCC. Concerns may be about something that:

- is unlawful
- is against the Commissioner's Procurement Regulations, Financial Regulations or policies
- falls below expected standards or practices
- results in waste or loss to the Commissioner
- amounts to improper conduct

Staff can do this in the knowledge that such concerns will be treated in confidence, properly investigated and without fear of reprisal and victimisation. If necessary, a route other than their normal line manager may be used to raise such issues. Examples of such routes are:

- The Chief Executive (01768 217734)
- The Joint CFO (01768 217734)
- External Auditors – Grant Thornton (0141 2230000)
- Internal Audit – (01228 606280)
- Public Sector Audit Appointments Ltd (020 7072 7445)
- Protect Charity (previously Public Concern at Work) on telephone number: 020 3117 2520

The Public Interest Disclosure Act 1988 protects employees, who report suspected fraud or corruption activities, from any reprisals as long as they meet the rules set out in the Act. In simple terms, the rules for making a protected disclosure are:-

- the information disclosed is made in good faith
- the person making the disclosure must believe it to be substantially true
- the person making the disclosure must not act maliciously or make false allegations
- the person making the allegation must not be seeking any personal gain

The designated officer required under the Act to receive disclosures is the Joint CFO. Members of the public are also encouraged to report concerns through any of the above avenues. Allegations/concerns can be made anonymously; however it should be noted that such cases can be more difficult to investigate. The likelihood of action will depend on:

- the seriousness of issues raised
- credibility of the concern
- likelihood of confirming the allegation from attributable sources

Senior management are responsible for following up on any allegation of fraud and corruption received and will do so by:

- dealing promptly with the matter;
- recording all evidence received;
- ensuring that evidence is sound and adequately supported;
- ensuring security of all evidence collected;
- notifying the Joint CFO, and implementing disciplinary procedures where appropriate.

The Commissioner will deal swiftly and thoroughly with any member of staff who attempts to defraud the OPCC or is corrupt. The Commissioner will be robust in dealing with financial malpractice.

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Prevention

The Commissioner recognises that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential staff in terms of their propriety and integrity. Staff recruitment is therefore required to be in accordance with procedures laid down by the Chief Executive and in particular to obtain written references regarding known honesty and integrity of potential staff before employment offers are made

All employees are expected to follow any Code of Conduct related to their personal professional qualifications and also to abide by the internal Codes of Conduct, policies and procedures. This policy and the role that appropriate staff are expected to play in the Corporate Governance framework and systems of internal control will be featured in staff induction procedures.

The Commissioner and any appointed Deputy Commissioner are required to adhere to the Code of Conduct relating to the declarations of interest. Staff are also required to declare pecuniary interests.

The Commissioner and all staff are required to declare in a public register any offers of gifts, gratuities or hospitality that are in any way related to the performance of their duties. Records of supplier contact are also required as part of these arrangements and the procurement regulations. Gifts, gratuities, hospitality and supplier contact disclosure forms are circulated to staff on a monthly basis with entries reviewed by the Chief Executive. The Joint Chief Finance Officer reviews entries in respect of the Chief Executive. The Deputy Monitoring Officer undertakes an annual dip sample between the gifts, gratuities and hospitality registers, the supplier contact register and contracting activity undertaken within the COPCC.

Significant emphasis has been placed on the thorough documentation of financial systems, and every effort is made to continually review and develop these systems in line with best practice to ensure efficient and effective internal controls. The adequacy and appropriateness of the financial systems used for the Commissioner's financial transactions, is independently monitored by both Internal Audit and External Audit. Senior Management place great weight on being responsive to audit recommendations

The Joint Audit Committee provides an independent and objective view of internal control by receiving and considering audit plans, reports and management letters and reports as appropriate.

As part of the prevention approach, the Commissioner will participate in National Fraud Initiatives organised by the Public Sector Audit Appointments Ltd. The Public Sector Audit Appointments Ltd and External Audit will also assist in prevention with the issue of warning bulletins and outcomes from surveys on fraud and corruption.

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Detection and Investigation

The array of preventative systems, particularly internal control systems within the OPCC, has been designed to provide indicators of any fraudulent activity. Although generally they should be sufficient in themselves to deter fraud, it is often the alertness of staff and the public to such indicators that enables detection to occur and the appropriate action to take place when there is evidence that fraud or corruption may be in progress. Despite the best efforts of financial managers and auditors, many frauds are discovered by chance or 'tip off', and arrangements are in place to enable such information to be properly dealt with.

Depending on the nature and anticipated extent of the allegations, Internal Audit will normally work closely with management and other agencies such as the police to ensure that all allegations and evidence is properly investigated and reported upon.

The OPCC's Disciplinary Procedures will be used where the outcome of the Audit Investigation indicates improper behaviours. The Commissioner may wish the police to prepare a case for the CPS regarding the prosecution of offenders where financial impropriety is discovered.

Any identified or reported allegations of fraud or corruption against the Commissioner would be dealt with by the Chief Executive and in accordance with the Police Reform and Social Responsibility Act 2011 be reported to the Police and Crime Panel. The Panel would then determine what action was to be taken in line with statutory guidance.

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Training

The Commissioner recognises that the continuing success of its Anti-Fraud and Corruption Policy and its general credibility will depend largely on the effectiveness of programmed training and responsiveness of staff throughout the organisation.

To facilitate this, the Commissioner supports the concept of induction and training particularly for staff involved in internal control systems to ensure that their responsibilities and duties in this respect are regularly highlighted and reinforced.

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Conclusion

The Commissioner has in place clear networks of systems and procedures to assist it in the fight against fraud and corruption. These arrangements will keep pace with any future developments in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect its operation.

To this end, there is continuous overview of such arrangements, in particular, by the Joint CFO, through the Chief Internal Auditor and External Auditor.

ANTI FRAUD AND CORRUPTION POLICY AND PLAN

Fraud Response Plan

All instances of fraud and corruption will be investigated in accordance with this plan.

Fraud and corruption may be reported through a range of channels including direct to a line manager, by another manager or by means of external reports. The means of reporting fraud will be publicised within the OPCC and will be made known to partners and those individuals and organisations that we come into contact with.

The arrangements for detection and investigation are set out in the Anti-Fraud and Corruption Policy and Procedure. The Joint CFO and the Chief Internal Auditor will agree the approach to any investigation and ensure all parties are aware of reported fraud and corruption. Any investigation will

ensure any weaknesses in internal control are identified and that corrective action is taken in order to minimise the risk of any reoccurrence. Issues considered will be reported to the Joint Audit Committee.

Disciplinary procedures are likely to be invoked where the outcome of any investigation indicates misconduct. Proven cases of gross misconduct may result in dismissal of the employee. Misconduct includes fraud committed by a member of staff against the organisation.

Where financial impropriety is discovered arrangements may be made where appropriate for the prosecution of offenders by the CPS.

In instances where the misconduct takes another form such as the misuse of systems and equipment that does not result in financial loss then the outcomes will be monitored by the Commissioner through the processes in place to oversee Human Resources issues.

The Commissioner will seek to ensure that lessons are learned from any mistakes made that allowed any instances of fraud or corruption to be perpetrated or to have gone unnoticed. This will be achieved by ensuring that system weaknesses or other contributory factors are identified and addressed. This will normally be achieved through an Internal Audit investigation, report and action plan to ensure that audit recommendations are implemented.

The External Auditor also has the powers to investigate fraud and corruption independently and the Commissioner will make use of these services in appropriate cases.

The Joint CFO will determine if a matter needs to be brought to the attention of the Chief Executive and Commissioner.

In the event that the Commissioner is involved, the matter will be brought to the attention of the Monitoring Officer.

The Joint CFO and the Chief Internal Auditor will maintain a link with the Public Sector Audit Appointments Ltd to keep them apprised of developments in serious cases.

Anti-Fraud and Corruption Procedure

This procedure has been written to support the Police and Crime Commissioner's Anti-Fraud and Corruption Policy.

ANTIFRAUD AND CORRUPTION PROCEDURE

Introduction

The COPCC has a policy against fraud and corruption. In summary, the COPCC will not tolerate fraud or corruption including theft and irregularity in the administration of their responsibilities and expect staff to take positive action wherever fraudulent or corrupt activity is suspected.

The COPCC is clear that Misconduct Procedures will be invoked where improper behaviour is indicated, and that if there is evidence of criminal behaviour this is prima facie gross misconduct requiring immediate action to be taken where suspension or summary dismissal are likely. Where there is evidence of criminal behaviour the matter may be referred to the Police.

The Anti-Fraud and Corruption Procedure provides guidance to all staff to ensure adherence to the policy.

ANTI-FRAUD AND CORRUPTION PROCEDURE

What is meant by Fraud and Corruption?

Fraudulent or corrupt acts may include:

- **System Issues:** where a process/system exists, which is prone to misuse/abuse by either employees or public, (e.g. misuse of the order processing systems).
- **Financial Issues:** where individuals or companies have fraudulently obtained money from the Authority, (e.g. invalid invoices/work not done).
- **Equipment Issues:** where Authority equipment is used for unauthorised personal use, (e.g. personal use of the organisation's assets - vehicles/computers/telephones etc.).
- **Resource Issues:** where there is a misuse of resources, (e.g. theft of cash/assets).
- **Other Issues:** activities undertaken by Staff, which may be: unlawful; against policies or procedures; fall below established standards or practices; or amount to improper conduct, (e.g. receiving unapproved hospitality).

ANTI-FRAUD AND CORRUPTION PROCEDURE

Your Duty

It is the duty of everyone:

- Not to commit or connive in any fraudulent or corrupt act.
- To raise with a senior officer or manager or the people listed in the contacts section of this procedure, any suspicion of improper activity which indicates fraudulent or corrupt behaviour on the part of a colleague or an external third party
- Not to discuss suspicions of improper practice other than with a senior officer or manager or the people listed as Contacts.
- Senior officers or managers must investigate or cause to be investigated, any such suspicion which has been raised with them.
- To maintain and constantly monitor the necessary controls to guard against fraud and corruption, which are laid out in the COPCC's procedural documentation, principally the Procurement Regulations and the Financial Regulations/Rules.
- Ensure any payments due to an employee are authorised by an independent member of staff.
- Always maintain controls that ensure functions involving the safeguarding of resources are administered by two members of staff (for example the order and certification of receipts of goods).
- As a public servant, to assess the needs of the public, partners and our suppliers impartially, professionally and without personal prejudice and to determine the outcome of competitive situations with these same qualities.
- When private or personal interests arise in any matter, which presents when at work, not to let those interests influence actions on behalf of the Commissioner. (The test is – “can I justify my actions if they become public?” If in doubt, consult your manager/supervisor).
- To adhere to the guidelines below regarding ‘Special Interests’ and offers or acceptance of hospitality and gifts and gratuities.
- To record supplier contact

ANTI-FRAUD AND CORRUPTION PROCEDURE

What to do if you suspect Fraud or Corruption

The Public Interest Disclosure Act 1998 provides legal protection for employees who raise genuine concerns in relation to suspected fraud and corruption issues.

If you have reason to suspect fraud or corrupt activity on the part of a colleague, you should raise the matter discreetly and as soon as possible with your line manager. If you feel that immediate contact with your manager is inappropriate under the circumstances, the following people are also directly approachable.

Contacts

- The Chief Executive (Monitoring Officer) (01768 217734)
- The Joint CFO (01768 217734)
- Internal Audit – (01228 606280)

In ordinary circumstances, these are the normal points of contact for these issues in the COPCC, however in an exceptional case if an individual feels that concerns cannot be raised through any of the above routes, then the following external organisations offer alternative confidential 'helpline' services.

- External Auditors – Grant Thornton (0141 2230000)
- National Audit Office (020 7798 7999)
- Action Fraud (0300 123 2040)
- Protect Charity (020 3117 2520)

ANTI-FRAUD AND CORRUPTION PROCEDURE

What to do if a member of staff raises concerns with you

If an allegation of fraud or corruption is made to you as a line manager, you must raise the matter with the Chief Executive and/or the Joint CFO. They will determine the appropriate investigative response and whether the Internal Auditor should become involved, or a criminal investigation undertaken.

Notwithstanding the above procedure the manager may feel, due to the nature of the allegation, that it is inappropriate to inform the personnel listed and in such exceptional circumstances any other of the contacts listed above may be informed. Arrangements will then be made to:

- Deal promptly with the matter
- Record all evidence received
- Ensure the evidence is sound and adequately supported

- Ensure the security of all evidence collected
- Advise the Joint CFO and the Internal Auditor

ANTI-FRAUD AND CORRUPTION PROCEDURE

Advice to members of the public

In the event of a member of the public becoming suspicious of fraudulent or corrupt administrative or financial activity within the COPCC, the matter should be reported to the Monitoring Officer in the first instance. Any information will be treated in confidence and can, if you wish, be provided anonymously.

Contact Details

01768 217734

commissioner@cumbria-pcc.gov.uk

ANTI-FRAUD AND CORRUPTION PROCEDURE

Special Interests

Employees must disclose in writing any financial interest (direct or indirect) which they may have in any contract the COPCC has entered into or may enter into. They must not accept any fees or rewards whatsoever other than proper remuneration from their employer. The standards expected from staff in commercial transactions are set out in the OPCC Code of Conduct.

Interests other than financial can be equally as important – and include for example, kinship, friendship, membership of a society or association, or trusteeship and so on. The individual must judge whether the interest is sufficiently close as to give rise to suspicion or create a perception that a transaction can give rise to suspicion. It is always better to err on the side of caution than to deal with a challenge after the event. If a matter that involves such intangible interests arises at a meeting of the COPCC in which you are a participant, you must orally disclose that interest and ensure that it is minuted in the record of the meeting.

The Chief Executive and Monitoring Officer to the COPCC will maintain a Register of Interests for the Commissioner and COPCC staff. Forms relating to the Commissioner and members of the Executive Team are available for public inspection on the COPCC website. Policies and procedures for vetting,

secondary employment and business interests will be used to support obligations in respect of declarations of interest.

Members of OPCC staff will be required to complete the register of interests' form, forms for secondary employment and related party transactions. The forms will be countersigned by the individual's line manager following a meeting. It is important that the responses and completion of the form is done honestly and that it is updated if changes to an individual's circumstances occur. Forms are completed by all members of OPCC staff. Forms for the Commissioner and COPCC staff will be held by the Chief Executive. The forms for related party transactions and secondary employment will remain confidential subject to inspection by Senior Managers, internal / external audit or other persons undertaking approved investigations.

ANTI-FRAUD AND CORRUPTION PROCEDURE

Conflict of Interests

Where identified conflict of interest arises the Commissioner and staff are required to raise this with the Monitoring Officer or Deputy Monitoring Officer. Consideration will be given to the issues surrounding the conflict and where necessary appropriate steps will be taken to remove the individual from being involved in any decisions or business dealings relating to this issue. Where this is not possible the Monitoring Officer or Line Manager will oversee all elements of the process to ensure there was no impropriety and to safeguard the member of staff.

Where conflict relates to the Police and Crime Commissioner it may not be possible to remove them from a decision if they are the only person with authority to make it. Should this arise the Monitoring Officer would oversee all elements of the decision process to ensure no undue influence was brought to bear.

The appointment of a Joint Chief Finance Officer (CFO) between the Constabulary and the Police and Crime Commissioner raises specific risks of conflict of interests arising for the post-holder. In response to this risk, procedures for identifying, recording and resolving conflicts of interest in relation to the Joint CFO role have been agreed. The procedures provide options for resolving conflicts of interest including separate advice to the PCC and Chief Constable by the Joint CFO and Deputy CFO, support from another PCC CFO through the PACCTS 'buddy scheme' and a support arrangement from the PCC CFO for Durham.

ANTI-FRAUD AND CORRUPTION PROCEDURE

Politically Restricted Posts (PORP)

All posts within the Office of the Police and Crime Commissioner will be designated as a PORP.

Posts that have been designated as PORPs will include reference to this fact in the job description and post holders will be informed of the restrictions which apply.

Designation as a PORP means that the post holder is disqualified from election to a Local Authority or National and European Parliaments. (This does not include Parish or Community Councils). Designation as a PORP also restricts PORPs from:

- Candidature for public elected office (other than to a Parish or Community Council);
- Holding office in a political group;
- Canvassing at elections;
- Speaking or writing publicly (other than in an official capacity) on matters of party political controversy.

In addition to the specific restrictions placed on an individual nominated as a PORP, the organisations of the COPCC and Constabulary should not issue material that is likely to affect public support for a legally constituted political party.

ANTI-FRAUD AND CORRUPTION PROCEDURE

Gifts, Gratuities, Hospitality and Supplier Contact Records

The Chief Executive is responsible for ensuring a register is maintained to record all interests and of all gifts, gratuities and hospitality offered and declined or retained. They are also responsible for ensuring records are maintained of supplier contact.

ANTI-FRAUD AND CORRUPTION PROCEDURE

Offers and Acceptance of Hospitality

It is essential when dealing with organisations or individuals likely to benefit from the goodwill of the COPCC or existing/potential contractors that:

- You are never placed in the position of owing favours.

- Your conduct does not allow for any suspicion that you could be unfairly favouring any particular third party over others.
- Invitations of hospitality should only be accepted if they do not exceed £25. Invitations to events should only be accepted if
 - you are participating (e.g. speaking)
 - attending as part of your duties and responsibilities, and
 - attendance has been properly authorised by the Chief Executive.
 - The Chief Executive's attendance must be authorised by the Commissioner.
- Hospitality that could be considered excessive or might give the perception of influence should be avoided. Any hospitality received should not be greater than that which the organisation would reciprocate, and which would be acceptable to the public as a use of public funds.

Whilst a working lunch, or refreshments such as tea or coffee, is often an acceptable part of normal working relations, the following should be avoided:

- Hospitality received which constitutes more of a social function.
- An excess of hospitality, both in terms of frequency or lavish meals. Meals should not exceed £25.
- Includes any alcoholic beverage.
- Hospitality which could give rise to suspicions of favour.

If there is any doubt as to whether an invitation should be accepted or declined, your line manager should be consulted.

The Commissioner and COPCC staff should record all offers of Hospitality (accepted or declined) on the Gifts and Hospitality and Gratuities Declaration form available in the OPCC/Governance/Gifts and Hospitalities folder. Staff will be reminded on a monthly basis to complete the relevant forms and quarterly at team meetings of their obligations. Forms will be monitored by the Chief Executive and published on the OPCC website on a monthly basis.

The Gifts and Hospitality Register for the Chief Constable will be countersigned by the COPCC Chief Executive. The Register is to be reviewed by the Chief Executive on a quarterly basis and published on the COPCC and force website.

ANTI-FRAUD AND CORRUPTION PROCEDURE

Offers and Acceptance of Gifts and Gratuities

Gifts other than small value, not exceeding £10, should be courteously declined, other than where this may cause offence. In these circumstances the Chief Executive may be consulted and can determine to accept the gift on behalf of the COPCC. Such gifts must be recorded by the Chief Executive in the gift, gratuity and hospitality register with a record of where the gift is held.

Considerations

The over-riding principle is the presumption that any offer of gifts, gratuities or hospitality are declined; however, the following considerations should assist staff in determining the boundaries of acceptability of any gift or hospitality over the value of £10. Think **G.I.F.T.**

- **Genuine:** is this offer made for reasons of genuine appreciation for something I have done? Why is the offer being made, what are the circumstances, have I solicited this offer in any way or does the donor feel obliged to make this offer?
- **Independent:** Would the offer, or acceptance of it, be seen as reasonable in the eyes of the public? Would a reasonable bystander be confident I could remain impartial and independent in all of the circumstances?
- **Free:** Could I always feel free of any obligation to do something in return? How do I feel about the propriety of the offer? What are the donor's expectations of me should I accept?
- **Transparent:** Am I confident that my acceptance of this offer will be subject to scrutiny by COPCC, colleagues, and to the public or was reported publically? What could be the outcome for COPCC if this offer was accepted or declined?

To assist staff and line managers the following guidance will help to achieve a consistent approach in applying the considerations listed above. Examples of gifts which could be accepted are:

- Modest promotional gifts provided to staff at seminars and conferences (pens, diaries, calendars, office requisites, mugs and coasters).
- Small commemorative items from visiting overseas law enforcement or governmental agencies or similar organisations.
- Unsolicited and inexpensive gifts of thanks from members of the public or victims of crime may be offered to individuals in genuine appreciation of outstanding levels of service.

Gifts of a modest nature (below £10) should not be accepted where the volume/frequency of the gift is excessive. In cases of uncertainty the Deputy Monitoring Officer should be asked for advice.

A gratuity may be accepted if it is:

- An offer or discount negotiated through a staff association or trade union.
- Discounts to public service workers including members of the police service, offered on the basis that the organisation has a large customer base and explicit approval has been given.

Donations to the organisation as a whole (eg sponsorship of an event or a piece of equipment) are acceptable but must be dealt with in accordance with the Financial Regulations. The Chief Executive must determine whether the donation will be accepted.

As a general rule, all gifts and gratuities should be graciously declined. Gifts delivered should be returned to the sender with an appropriately worded letter, and your line manager must be informed.

Gifts can include loans, legacies, favours such as trading discounts and free or discounted admission to sporting or other events. In the event of a legacy from clients or others who have benefited from the services of the COPCC, the Chief Executive must be informed immediately. Where refusal of a gift might cause actual offence, steps are likely to be taken to transfer the value of the gift to a charity as a gift from the COPCC.

If there is any doubt, the items should be refused, and the principles outlined here apply equally if gifts are offered to your immediate family but might be perceived as being an inducement, given your relationship with the donor.

COPCC staff should record offers of gifts and gratuities (accepted or declined) on the Gifts, Gratuities and Hospitality Declaration form available in the OPCC/Governance/Gifts and Hospitalities folder. Staff should also record on supplier contact forms any contact, other than unsolicited mail, irrespective of whether a gift, gratuity or hospitality has been offered. Forms will be monitored by the Chief Executive. Audits of this register will be carried out on a quarterly basis by the Deputy Monitoring Officer. Any issues or trends identified from the review will be reported to the Chief Executive.

ANTI-FRAUD AND CORRUPTION PROCEDURE

Reward Points

The Commissioner and COPCC staff should not accept, retain or utilise any reward points accrued through business purposes for private or personal gain, eg points accrued at a petrol station, air miles. Gratuities which amount to individual gain from a points scheme when purchasing services, items or fuel are not acceptable.

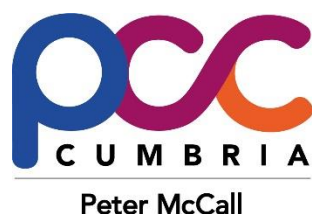
ANTI-FRAUD AND CORRUPTION PROCEDURE

Review of the Arrangements and Risk

The Chief Executive will maintain appropriate procedures and documentation to assure the awareness of all OPCC staff as to these arrangements.

These arrangements will be included in the list of Risk Items from which the recurring review programmes of Internal Audit are selected.

Fraud risk will be considered as part of the COPCC's wider strategic and operational risk management. Any identified risks will be classified to the possible type of offence; assessed for each area and process of business and the potential members of staff this could affect.



Cumbria Office of the Police & Crime Commissioner OPCC Staff Register of Interests

Cumbria Office of the Police and Crime Commissioner (COPCC) has adopted an Anti-Fraud and Corruption Policy and Code of Conduct consistent with the highest levels of conduct from its employees.

In accordance with this policy (which includes the avoidance of suspicion of fraudulent or corrupt behaviour), you are asked to indicate or disclose any interest which may give rise to any suspicion of favouritism or other breach of the seven principles of public life (Nolan Committee) of this policy.

PERSONAL / POST DETAILS

Name

Job / Title

Grade / Rank

FINANCIAL INTERESTS

It is important that employees are seen not to have a financial interest in any aspect of procurement carried out by the Organisation.

Do you have secondary employment or trade on a self-employed basis or as a partner in a firm? If so indicate your role and the employer's / firm's address and nature of business.

Tick the appropriate response.

	No I do not.
	Yes I do.
	Details:

--	--

Do you hold any paid or unpaid directorships? If so indicate the companies or charity concerned and the nature of their business.

Tick the appropriate response.

	No I do not.
--	---------------------

	Yes I do.
	Details:

Are you a member of an unlimited company or a company limited by guarantee (which may include a charity that has been set up in accordance with *company rules*)? If so, name the company and the nature of its business.

Tick the appropriate response.

	No I do not.
--	---------------------

	Yes I do.
	Details:

Do you through shareholding or your nominees hold a significant financial interest in a company? 'Significant' means a shareholding in excess of 10% of the nominal issued share capital of the company – normal shareholding in companies quoted on the Stock Exchange are therefore most unlikely to fall under this heading.

Tick the appropriate response.

	No I do not.
--	---------------------

	Yes I do.
	Details:

To your knowledge do your – spouse / partner have an interest declarable under the above?
If so give details of the individual, their relationship to you and the nature of the interest.

Tick the appropriate response.

	No I do not.
--	---------------------

	Yes I do.
	Details:

OTHER INTERESTS

It is important that staff in influential positions should not be perceived as being open to 'influence' in the provision of the COPCC service.

Indicate below your membership of any societies / associations / clubs, which in your opinion give rise to unwarranted suspicions of partiality in the discharge of the duties of your post.

Tick the appropriate response.

	I do not belong to a society / association / club that could give rise to suspicions about my partiality in the discharge of my post.
--	--

	Yes, I do belong to the following society(s) / association(s) / club(s) that could give rise to unwarranted suspicion about my partiality in the discharge of my post.
	Details:

Indicate below if you are a member of a Local Authority or statutory undertaking (including ministerial appointee to any statutory body or undertaking) which is constituted to discharge or assist in discharging a statutory function (e.g. member of a statutory working group [i.e. Food & Drink Advisory Panel], lay-minister etc.).

Tick the appropriate response.

	I am not a member of a Local Authority or statutory undertaking constituted to discharge or assist in the discharging a statutory function.
--	--

	Yes, I am a member of a Local Authority or statutory undertaking constituted to discharge or assist in the discharging a statutory function.
	Details:

Indicate below any relationships you have with current or potential suppliers to the OPCC, which in your opinion may give rise to unwarranted suspicions of partiality in the discharge of the duties of your post.

	I do not have any relationships with current or potential suppliers to the OPCC
--	--

	Yes, I have a relationship with current or potential suppliers to the OPCC
	Details:

Declaration:

I confirm that I have disclosed all of my financial and non-financial interests and those of my immediate family to the best of my knowledge and belief. I understand that it is my responsibility to disclose to the Monitoring Officer any additional interests as they arise.

Signed: **Date:**

Once you have completed and signed the form, your line manager is required to countersign the form.

Line Manager: **Date:**

The forms will be forwarded to the Chief Executive (Monitoring Officer) when complete for retention.

RELATED PARTY TRANSACTIONS PROCESS

Cumbria Office of the Police & Crime Commissioner (COPCC) must prepare its annual accounts in accordance with the applicable reporting standard (IAS24: Related Party Transactions) and the requirements set out in the Chartered Institute of Public Finance and Accountancy Code of Practice.

Staff within the COPCC above a certain pay scale are requested to complete a 'Declaration of Related Party Transactions' Form for each financial year they are employed by either organisation.

Information regarding Related Party Transactions is retained within the OPCC IT System. A process has been developed to deal with Related Party Transactions as follows –

- Within the relevant year there is a procedures log to complete when actions have been carried out.
- Create covering letter which the Joint Chief Finance Officer (JCFO) will approve.
- Send covering letter and form to be completed to Printing to print. (The form must be printed on a different coloured paper from the previous year – eg 2011 forms were pink)
- Update the list of who is to receive the letter with whether they have left or been appointed during the financial period.
- The recipient will receive a copy of the letter, form to complete and a stamped addressed envelope.
- They are given approximately 1 month to complete the form and return it to the COPCC.
- If the form is not received within the time given then contact the individual and also sent out a chase up letter. This will include a follow-up letter, the original letter and a blank form to complete.
- Upon receipt of completed forms, check to see if there are any 'positive' returns. These are then given to the CFO and Monitoring Officer to look at.
- The OPCC will undertake to review the constabulary's completed forms as part of its oversight and scrutiny role on an annual basis.
- All returned forms are kept in alphabetical order with any 'positive' returns placed in a separate section at the top of the pile.
- A copy of the completed procedures log is printed off and attached to the top of the pile.
- The forms will be viewed by the Auditors on an annual basis.



Peter McCall

CUMBRIA OFFICE OF THE POLICE AND CRIME COMMISSIONER

Declaration of Related Party Transactions 200+ / ++

Name:

In answering each question, please state the dates, amounts and any other relevant details.

Have you or any partnerships, companies, trusts or any other entities in which you have a controlling interest undertaken any transactions with Cumbria Office of the Police and Crime Commissioner during the 200+ / 200+ financial year, which should be disclosed under the criteria specified in the covering letter?

Have any of your close family, members of your household or any partnerships, companies, trusts or any other entities in which they have a controlling interest undertaken transactions with Cumbria Office of the Police and Crime Commissioner in the 200+ / 200+ financial year, which should be disclosed under the criteria specified in the covering letter?

Are you involved with any interest groups which have undertaken transactions with Cumbria Office of the Police and Crime Commissioner in the 200+ / ++ financial year, which should be disclosed under the criteria specified in the covering letter?

Have you or any partnerships, companies, trusts or any other entities in which you have a controlling interest undertaken any transactions with Cumbria Constabulary during the 200+ / 200+ financial year, which should be disclosed under the criteria specified in the covering letter?

Have you received any services free of charge to which a charge is normally levied?

Any other relevant information should be disclosed in the space below.

Signed:-

Date:-

Please return the signed form to the Monitoring Officer by 4 April 20++.
Please note that nil returns should still be submitted.



Peter McCall

CUMBRIA OFFICE OF THE POLICE AND CRIME COMMISSIONER

CODES OF CONDUCT UNDERTAKING

I,having become a Member of the COPCC and Constabulary Joint Audit Committee, declare that I will duly and faithfully fulfil the requirements of this role according to the best of my judgement and ability and within codes adopted by the COPCC / Constabulary:

I undertake to observe and comply with the model Code of Conduct (1) expected from Members, as adopted by the COPCC / Constabulary; of which I am supplied with a copy.

I confirm receipt of a form (2) for notification by a member of their financial and other interests under which I will complete and return to the Monitoring Officer for entry in the COPCC's Register. I undertake to update the Monitoring Officer on any changes to those notifiable interests.

I further undertake to observe and stand by the Anti-Discrimination Code of Conduct (3) adopted by the COPCC for its members and staff, of which I am also supplied with a copy.

I finally undertake to observe and stand by the Member-Officer Protocol (4) adopted by the COPCC / Constabulary, of which I am additionally supplied with a copy.

Signed Date

This undertaking was made and signed before me

Signed Date

Proper Officer



Peter McCall

CUMBRIA OFFICE OF THE POLICE AND CRIME COMMISSIONER

CODES OF CONDUCT UNDERTAKING

I,as a Member of staff of Cumbria Office of the Police and Crime Commissioner, declare that I will duly and faithfully fulfil the requirements of this role according to the best of my judgement and ability and within codes adopted by the COPCC.

I undertake to observe and comply with the model Code of Conduct (1) expected from members of staff, as adopted by the COPCC; of which I am supplied with a copy.

I confirm receipt of a form for notification by a member of staff of their financial and other interests under which I will complete and return to the Monitoring Officer for entry in the COPCC's Register. I undertake to update the Monitoring Officer on any changes to those notifiable interests.

I further undertake to observe and stand by the Anti-Discrimination Code of Conduct adopted by the COPCC for its members and staff, of which I am also supplied with a copy.

I finally undertake to observe and stand by the Commissioner-Officer Protocol adopted by the COPCC, of which I am additionally supplied with a copy.

Signed Date

This undertaking was made and signed before me

Signed Date

Monitoring Officer

Cumbria Office of the Police and Crime Commissioner

Register of Gifts, Hospitality and Gratuities – Police & Crime Commissioner / OPCC Staff

Date of Offer	Date of Event	Offered To	Company/organisation and Description of Offer and Reason	Estimated /Actual Value £	Action Taken Accepted Refused Returned	Reasons for Accepting / Declining
Month						
Month						
Month						

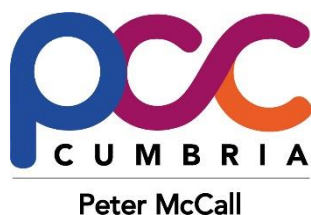
Reviewed by OPCC Chief Executive on - (DATE)
Updates to this document will be provided following the end of the calendar month.

Cumbria Office of the Police and Crime Commissioner

Register of Contact with Service Providers – Police & Crime Commissioner / OPCC Staff

Date of Contact	Name of Officer who had contact	Name of Supplier / Contractor	Nature / Description of the contact	Officer to be involved in procurement process Yes / No
Month				
Month				

Reviewed by OPCC Chief Executive on - (DATE)
Updates to this document will be provided following the end of the calendar month.



Independent Custody Visiting Scheme

MEMORANDUM OF UNDERSTANDING

The purpose of this agreement is to highlight some of the main commitments that Cumbria Office of the Police and Crime Commissioner (OPCC) requires from each Independent Custody Visitors (ICV's).

1. ROLE AND RESPONSIBILITIES

The purpose of your role is to observe and report upon the conditions under which persons are detained at Police Stations. Your concern is for the welfare of the person in custody and the operations in practice of the statutory and other rules governing their welfare including a consideration of their welfare in regard to equality.

2. PROBATIONARY PERIOD

You will be required to serve a probationary period of 6 months, starting from the date of commencement of voluntary service. The purpose of the probationary period is to give you an opportunity to establish your own suitability for the role. The appointment is subject to the satisfactory

3. APPOINTMENT

Your appointment is initially for a period of three years. After three years and six months you will be able to be considered for re-appointment for a further three years. This is subject to the approval of the Scheme Administrator in consultation with the Chair of the panel to which you are appointed. No visitor may serve more than three terms of appointment (ie a maximum of 9 years).

4. IDENTITY CARDS

Your Custody Visitor identity card will be valid for the period that you are appointed as a Custody Visitor. The identity card authorises you to visit police stations within your Panel area and should only be used for the purpose of making visits. If it is used for any other purpose, it will be withdrawn and your appointment as a Custody Visitor may be terminated. Identity cards must be returned on termination of appointment as a Custody Visitor.

4. EXPECTED ROTA AVAILABILITY & VISITS

You are expected to make a minimum of six visits per year; if there are exceptional circumstances, which prevent you from fulfilling this requirement, you should ensure that the Scheme Administrator is aware of these. If you have not made a visit within a four month period, the Chair of your Panel will advise the Scheme Administrator who will write to you to ascertain the reason and seek an explanation. Should an unsatisfactory explanation be provided the Scheme Administrator may remove you from the scheme.

We recognise that this role is given on a voluntary basis, however it is hoped that you will make every effort to fulfil the commitments you have agreed to undertake. Inability to sustain regular and reliable attendance may be grounds for termination of your appointment, as this may have an impact on the scheme as a whole.

5. UNDERTAKING VISITING

You are required to make visits in pairs at all times and you can only make a visit when accompanied by another Custody Visitor. There are no exceptions to this requirement, and custody staff are aware that they should not allow anyone who is unaccompanied to make a visit. Failure to adhere to this may result in you being removed from the Scheme.

7. DOCUMENTATION

You are required to complete reports for every custody visit made (even when there were no detainees in custody) and submit them promptly to the Office of the Police and Crime Commissioner.

8. DISCLOSURE OF CRIMINAL CONVICTIONS OR CHANGE IN CIRCUMSTANCES DURING YOUR ROLE AS A VOLUNTEER WITH CUMBRIA OPCC

As a volunteer for Cumbria OPCC it is important that you maintain high standards and that the OPCC should be made aware of any matter which could affect its relationship with you. Accordingly you are required to inform the Scheme Manager in writing, within 7 days of any involvement in ongoing civil or criminal court proceedings, any criminal convictions or cautions received or any ongoing criminal investigations in which you are involved. Similarly you should also notify the Scheme Manager if you become a Magistrate, Special Constable, Police Officer or undertake any other work which may present you with a conflict of interest.

9. ATTENDANCE AT TRAINING SEMINARS

You will be expected to attend the training events and conferences arranged by the Office of the Police and Crime Commissioner for Cumbria. You are also encouraged to attend regional or national conferences where appropriate. Induction training will cover the following areas Equality and Human Rights training.

10. ATTENDANCE AT PANEL MEETINGS

You will be expected to attend each of the 4 monthly Panel meetings. If you have not attended any Panel meetings within a twelve month period, the Chair of your Panel will advise the Scheme Administrator who will write to you to ascertain the reason and seek an explanation. Dependent upon the outcome the Scheme Administrator may remove you from the scheme. Continued non-attendance at Panel meetings will be reviewed by the Scheme Administrator and you may be removed from the scheme.

11. IMPARTIALITY AND CONFIDENTIALITY

During the course of your duties, you may acquire considerable personal information about persons connected with police enquiries, the majority of whom will not at that time have appeared in Court. Some will never appear in Court. That information must be protected against improper or unnecessary disclosure. You should be aware that improper disclosure of information acquired during the course of a visit may attract civil or criminal proceedings. Additionally, unauthorised disclosure of facts concerning police operations or the security of police stations may constitute an offence under the Official Secrets Act 1911 and 1989 and the Data Protection Act

1998 or any amending legislation including the General Data Protection Regulation EU2016/67 and the Computer Misuse Act 1990.

You must undertake not to disclose any information related to persons connected with police enquiries or police operations that you may acquire as part of your duties as a Custody Visitor.

12. DATA PROTECTION

Cumbria OPCC will only ask for information that it really needs and that it will keep the information securely, limit access to it and will not pass any details on without consent unless legally obliged to do so.

13. DRESS CODE

All Independent Custody Visitors are required to be smart in appearance whilst undertaking their volunteering duties in order to create a professional image.

14. EXPENSES

It is essential that you are not out-of-pocket because of your voluntary work and all reasonable expenses will be paid. Any ICV using their own motor vehicle to and from a designated police station are advised to inform their insurers about their duties. The OPCC requires all ICV's to complete a Vehicle Indemnity Insurance form.

15. TIME AWAY FROM THE SCHEME

We recognise that there may be times when you need to take a longer period of time off from your role as an ICV, which could be due to personal or work circumstances. Please contact the Scheme Administrator as soon as possible to discuss the issues and assess the request for time away from the scheme. The Scheme Administrator has the ability to authorize an absence of up to a maximum of 12 months from the scheme.

16. PERIOD OF NOTICE

Wherever possible we would ask that you provide the OPCC with at least one month's notice of your intention to resign your appointment. This should be given to the Scheme Administrator. All ID badges and any other information or equipment must be returned on your last day of service.

17. HEALTH AND WELLBEING

In accordance with the Health and Safety at Work Act 1974, as a volunteer you are responsible for ensuring your own safety and must not do anything which may cause injury or risks to other persons; whether they are Cumbria Constabulary employees, volunteers or members of the public.

18. NO SMOKING POLICY

The OPCC and Cumbria Constabulary operate a No Smoking Policy.

19. PERSONAL DATA

As a volunteer you give Cumbria OPCC permission to collect, retain and process information about you in relation to your ICV role. This information will only be used so that we can monitor our compliance with the law and for payment purposes. Should your personal circumstances change, you should notify the Scheme Administrator immediately.

20. QUERIES

Queries on any aspect of the scheme should be addressed to the Scheme Administrator, who can be contacted on 01768 217734 or via e-mail custodyvisitors@cumbria-pcc.gov.uk

Please read, sign the declaration below and return to the ICV Scheme Administrator

ICV Memorandum of Understanding Signed Statement:

- I have read and understood this Memorandum of Understanding and agree to abide by it.
- I confirm my receipt, understanding of and agreement to the provisions of the Official Secrets Act 1911 and 1989, Data Protection Act 1998 or any amending legislation including the General Data Protection Regulations EU2016/67 and Computer Misuse Act 1990 both during the course of my voluntary service and following its termination.

Name: Signed:
(BLOCK CAPITALS) Date:

Appointed to : BARROW* / KENDAL* / NORTH* / WEST* Panel

(* Please delete as not appropriate)



Peter McCall

COMMISSIONER AND OFFICER
PROTOCOL - DECLARATION

I agree to conduct myself in accordance with and abide by the Police & Crime Commissioner and Officer Protocol whilst conducting duties of the Office of the Police and Crime Commissioner for Cumbria.

Signed: **Date:**

Police & Crime Commissioner/ Deputy Police & Crime Commissioner/Appointed Person/Member of staff of the Office of the Police & Crime Commissioner for Cumbria
(Delete as not applicable)

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Policy and supporting procedures

Policy:	Anti-Fraud and Corruption, Business Interests and Additional Occupations, Association and Substance Misuse Policy and supporting procedures. Lost ID Card Procedure.	
Approved by which board (or Chief Officer) and date:	Workforce Board	
Owner	Superintendent Head of People Department	
For release under Freedom of Information?		Yes
Supporting procedures	Included in appendix	
Contact for advice	Professional Standards Department	
Review date	July 2024	

If changes have been made to an existing policy, you must complete the boxes below

Amendments made	An amalgamation of a number of policies into one which also incorporate procedures as appendix.
Date and Version Number	April 2019 – Version 1.0 July 2021 – Version 1.1

1. Equality Analysis

What is the potential impact in relation to the General Duty of this proposal on each of the protected groups below?

Protected characteristics	Positive Impact				Negative Impact (provide details and mitigating actions taken or proposed)	No Impact (v)
	Does the proposal:					
	eliminate unlawful discrimination (provide details)	advance equality of opportunity (provide details)	Foster good relations (provide details)	Other positive impact (provide details)		
Age	The policy will make sure that anybody of any age will be dealt with in the same way therefore eliminating discrimination	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all	A positive message is given to all staff/volunteers/contractors that all personnel no matter what position they hold within the force would be treated in the same way			
Disability	The policy will make sure that anybody with any disability will be dealt with in the same way therefore eliminating discrimination. Reasonable adjustments in accordance with the Equality Act 2010 will be implemented when required.	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all	A positive message is given to all staff/volunteers/contractors that all personnel no matter what position they hold within the force would be treated in the same way			
Sex	The policy will make sure that anybody of any gender will be	As all people that commit fraud/corruption will	A positive message is given to all staff/volunteers/contractors			

	dealt with in the same way therefore eliminating discrimination	receive the same investigation, equality of opportunity would be afforded to all	that all personnel no matter what position they hold within the force would be treated in the same way			
Sexual orientation	The policy will make sure that anybody of any sexual orientation will be dealt with in the same way therefore eliminating discrimination	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all			
Gender reassignment	The policy will make sure that anybody from the trans community will be dealt with in the same way therefore eliminating discrimination	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all	As all people that commit fraud/-corruption will receive the same investigation, equality of opportunity would be afforded to all			
Marriage and civil partnership	No impact					v
Pregnancy and maternity	The policy will make sure that anybody that is pregnant will be dealt with in the same way therefore eliminating discrimination	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all	A positive message is given to all staff/volunteers/contractors that all personnel no matter what position they hold within the force would be treated in the same way			
Race	The policy will make sure that anybody of any race will be dealt	As all people that commit fraud/corruption will	A positive message is given to all staff/volunteers/contractors			

	with in the same way therefore eliminating discrimination. Reasonable adjustments in accordance with the Equality Act 2010 will be implemented when required.	receive the same investigation, equality of opportunity would be afforded to all	that all personnel no matter what position they hold within the force would be treated in the same way			
Religion and belief including non-belief	The policy will make sure that anybody of any religious belief will be dealt with in the same way therefore eliminating discrimination. We will where appropriate respect different cultural customs and religious practises	As all people that commit fraud/corruption will receive the same investigation, equality of opportunity would be afforded to all	A positive message is given to all staff/volunteers/contractors that all personnel no matter what position they hold within the force would be treated in the same way			

If there is no potential impact (positive or negative) please provide a brief explanation why this is the case, e.g. The data utilised in arriving at the decision, summary of responses to consultation etc.

Brief explanation of the 'no impact' decisions above

2. Aim

Seek to maintain the highest standards of professional behaviour expected of all Police Officers and Police Staff in order to achieve the highest levels of confidence in Cumbria Constabulary with reference to the College of Policing Code of Ethics (2014).

Where these standards have not been met then this policy and supporting procedures address the action to be taken.

Ensure that Cumbria Constabulary provide an ethical service that is open and transparent, engendering trust and confidence both internally, amongst those within the organisation and, members of the public.

Ensure parity in decision making process across the whole of the policing family.

To ensure that welfare needs, safeguarding and risk assessments of individuals subject to any area within this policy are properly accounted for, this may extend to the needs of their families.

Assurance that the individuals and organisations (e.g. suppliers, contractors, service providers) with whom the Constabulary come into contact can themselves be relied on to act with integrity and without motivations or actions involving fraud and corruption. All personnel are responsible for the prevention of fraud and corruption.

Give members of the Constabulary and members of their families, where applicable, the opportunity to pursue a legitimate business interest. The business interest must be compatible with the duties of police officers and police staff and also the function of the Constabulary.

Protect the integrity of all Cumbria Constabulary employees from associations with an individual or group/s that may introduce an element of vulnerability and create the potential for compromise resulting from inappropriate associations, or to undermine public confidence and trust. Provide an effective method by which individuals can report concerns about association.

The policy is mandatory and applies to all police officers, special constables, police staff, volunteers and agency staff under the direction and control of the Chief Constable and assisting the Constabulary in pursuing its aims, and those third parties with whom the Constabulary have dealings.

This policy has been written to bring together a number of policies and supporting procedures under one document to enable a simpler and more effective way in which every member of the police family can access, read and use.

3. Terms and Definitions

Fraud

“Fraud can be broadly defined as the deliberate use of deception or dishonesty to disadvantage or cause loss (usually financial) to another person or party”. (Fraud Advisory Panel 2015).

Corruption

“A Law Enforcement Official commits an unlawful act or deliberately fails to fulfil a role arising out of an abuse of their position, for personal or perceived advantage having the potential to affect a member of the public”. (IPCC/ACCAG definition).

Theft

“The dishonest appropriation of property belonging to another with the intention of permanently depriving the other of it” (Theft Act, 1968).

Definitions

Association – is described as one or any combination of the following:

- Meeting or uniting for a common purpose;
- Keeping company or being familiar;
- Being an ally, confederate, partner or colleague;
- Having friendship, intimacy or connection;
- Being a member of a group, organisation or society which is formed for the promotion of a common object or objects.

The term ‘association’ is not intended to include a person whom a staff member knows casually. It is not a chance meeting with a passing acquaintance which may be repeated from time to time and it does not necessarily include merely being members of the same club or association.

Inappropriate Association - Any association will be deemed inappropriate if the personal relationship or involvement with an individual, group or organisation has the potential or is likely to:

- Compromise the individual employee/third party member, or
- Compromise the operation of Cumbria Constabulary, or
- Compromise the reputation of Cumbria Constabulary, or
- Undermine public confidence in Cumbria Constabulary.

In general, it should be presumed that any association with persons with criminal convictions which are not spent, and/or in respect of whom intelligence exists relating to current or recent criminal activities, will be considered as inappropriate.

Group or Organisation - There is no definitive list of groups or organisations deemed inappropriate. This is a matter for those following the procedure to determine but will include Membership of the British National Party, Combat 18 and the National Front as prohibited by force policy.

In addition, this could include:

- Membership by a police officer of any political party where membership involves the officer playing an active part in politics in contravention of Police Regulations;
- Association with groups or organisations involved in law breaking or criminal activity such as certain animal rights groups, football hooligans, etc.;
- Association with groups or organisations which would bring the force into disrepute. This could include, but is not limited to, racist groups or activist groups with aims which contravene the statement of common purpose and values of the Police Service or the intent or effect of any relevant legislation or policies governing Cumbria Constabulary;
- Association with groups or organisations which advocate either active or passive non-compliance with the law.

Compromise – is to place in a position of difficulty or danger, to expose to risk of failure, frustration or disgrace or to cast doubt on one's integrity. In the context of this procedure compromise includes the likelihood or potential of either actual or perceived risk to the individual staff member, operations or reputation of the force.

4. The Policy

Anti-Fraud and Corruption

responsibilities. It expects senior managers to take positive action whenever fraudulent or corrupt activity is suspected. The Constabulary will invoke misconduct procedures as per the current Police Conduct regulations and current Home Office Guidance wherever improper behaviour is indicated, and that if there is evidence of criminal behaviour, appropriate action will be taken.

The nature of the Constabulary is such that the prevention and detection of fraud in society at large is part of the core business conducted by the Constabulary. Consistent with this, and intrinsic to the nature of the Constabulary, substantial additional measures over and above those normally associated with an ordinary government department are taken to ensure the regularity and integrity of actions taken by police officers and police staff. These flow not only from the general body of criminal law, but also the collection of regulation and practice which constitutes the standards and misconduct regime for the Police Service itself. The Constabulary will therefore discharge its duties and maintain a Professional Standards function to oversee its own officers and staff and to represent the Constabulary's oversight interests in these priorities.

This policy outlines the principles which will be pursued in respect of police officers, special constables, police staff, volunteers assisting the Constabulary in its aims, and those third parties with whom the Constabulary have dealings.

This attitude towards fraud and corruption is summarised below:

- 1) Cumbria Constabulary is determined that the fundamental culture and philosophy of their organisations is one of scrupulous honesty and principled opposition to fraud and corruption. It will not tolerate fraud and corruption in the administration of their responsibilities, whether from inside the organisation or externally.
- 2) The Constabulary's minimum expectations regarding propriety and accountability are that members and staff at all levels will themselves set the standard and lead by example in ensuring proper adherence to legal requirements, rules, procedures and practices.
- 3) Senior managers are expected to deal swiftly and firmly with those who defraud the Constabulary who are corrupt. Because of those higher standards of integrity which the public rightly expects of police which the organisation need to assure in order to fulfil their pre-eminent role in maintenance of the rule of law and prevention of crime, the Constabulary reserve the right to treat prima facie evidence of such behaviour as immediately constituting gross misconduct.
- 4) The Constabulary also expect that those external individuals and organisations (e.g. suppliers, contractors, service providers) that it comes into contact with on a business basis, will conduct their dealings with the Constabulary with integrity and without motivation or actions involving fraud and corruption.
- 5) Allegations or concerns that fall within the scope of other policies (e.g. child protection or discrimination issues) will normally be referred for consideration under those policies.

To support this policy it is confirmed that sufficient internal resources will be allocated towards the detection and prevention of fraud and corruption. Interrelated procedures designed to frustrate, detect and identify any attempted fraudulent or corrupt act will be put in place and a formal investigation of any instances or suspected instances of fraud and corruption which may arise will always be undertaken. Details of the strategy supporting this policy and further guidance about what to do if you suspect fraud and corruption acts are taking place are outlined in the Anti-Fraud and Corruption Procedures

[See supporting procedures document – APPENDIX A](#)
Business Interests and Additional Occupations

This Policy sets out the framework to be used by Cumbria Constabulary when managing the application, approval or refusal, appeals and review of business interests.

The Constabulary is committed to maintaining a professional image and protecting the health, safety and wellbeing of its staff. It is obligated to maintain, and is entitled, to expect high standards of business conduct amongst its employees in order to ensure that public confidence is maintained.

For all police officers and staff who wish to undertake a business interest, Cumbria Constabulary will adopt the principles contained in the ACPO Guidance on the Management of Business Interests and Additional Occupations for Police Officers and Police Staff.

Special Constables are dealt with separately in terms of their employment outside the Service. This is detailed in NPIA Circular 01/2011. The considerations in this circular are broadly similar to those contained within the ACPO Guidance and must be decided on a case by case basis.

The Constabulary will act fairly and proportionately when considering all business interests or additional occupation applications. If an individual wishes to appeal against any decisions made by the Constabulary they must follow the appeals process contained within the attached procedure.

As the individual you need to consider:-

- 1 - Could the voluntary role impact on your ability to perform your role in the Police. (e.g. mountain rescue or other role that might require some form of call out process)
- 2- Involve receipt of expenses, personal issue equipment or formal training qualifications paid for by the organisation.
- 3- Involves regular commitment of work or attendance that may contravene the European working time directive (working more than a 48hr week on average in any rolling 17 week period)
- 4- Conflict with role as a police officer or member of police staff (i.e. is the role or organisation one suitable or appropriate for a member of the constabulary to be part of)

If the voluntary work would fall under one of these areas than you should submit an application

[See supporting procedures document – APPENDIX B](#)

Association

The introduction of this policy will act as a deterrent to most employees and other relevant personnel but it is recognised that those who are corrupt are unlikely to report such associations voluntarily. For this there are well established counter corruption enforcement and investigative frameworks in place.

Cumbria Constabulary relies on the honesty and integrity of its staff and those third parties who work with them. As public servants, its staff are expected to observe the highest standards of conduct, in both their private lives and their employment. The community must have confidence in the Constabulary to conduct its duties and execute its powers fairly and impartially without the pressures of external influence or bias.

In practice, the vast majority of staff behave with complete integrity; however, Cumbria Constabulary recognises there is a risk of some officers, staff members or third parties associating with inappropriate persons, groups or organisations.

It is important that everyone understands the rules to be observed to ensure that no doubt is cast on the integrity of the organisation or individuals.

This document sets out the policy on vulnerable associations and the associated guidance notes linked to it.

In recent years the National Threat Assessment has identified inappropriate associations as being one of the major threats facing the Police Service. These procedures are intended to address this threat by protecting individual members of staff and Cumbria Constabulary. Owing to the organisation not being aware at an early stage, measures to support individuals were not possible resulting in an escalation of severity to a point where misconduct proceedings were necessary.

Police personnel come from all backgrounds and aspects of life. They represent a cross section of the community and this in itself is likely to cause potential conflicts and issues. Nationally it is accepted that police personnel can come under pressure from friendships that existed prior to and during their employment and/or family members who become involved in breaches of the law. In such circumstances there is a risk of divided loyalties and the possibility of demands for assistance at some stage.

The private life of police personnel can impact on their professional duties. Officers are reminded of the restriction on the private life of members of police forces set out in Regulation 6 and Schedule 1 of the Police Regulations 2003. This states that a member of a police force shall at all times abstain from any activity which is likely to interfere with the impartial discharge of his duties or which is likely to give rise to the impression against members of the public that it may so interfere. Likewise, the Police Officer Standards of Professional Behaviour sets out that the conduct and associations of Police Staff, at or outside of work, should not give cause for potential discredit to the Force or threaten its reputation. Public confidence in the police depends on police staff demonstrating the highest level of personal professional standards of behaviour.

An association will be deemed vulnerable if a relationship or involvement exists with any person who is known or believed to be within the following categories:

- o Persons with unspent criminal convictions;
- o Persons charged with a criminal offence where matters remain unresolved;
- o Persons known to be under investigation for, but not yet charged with, a criminal offence;

- o Persons subject of criminal intelligence or the subject of an interest marker;
- o Persons dismissed or required to resign from a police service or other law enforcement role for reasons of gross misconduct, e.g. honesty and integrity, which may have a bearing on the reputation of Cumbria Constabulary;
- o Former police officers, law enforcement officers or staff now working in a related field defined as any investigative role with a potential conflict with Cumbria Constabulary operations (e.g. private investigators and legal firms).

It is recognised that staff may not know with certainty whether a person they have a relationship or involvement with falls within the above categories; but if they have any suspicion or doubt that they might, they should discuss this with a supervisor but in no circumstances make their own enquiries by accessing or interrogating force information or intelligence systems.

This is not an exhaustive list and any association falling outside these categories but still meeting the criteria for an inappropriate or vulnerable association should be declared. A vulnerable association is not by default inappropriate but all inappropriate associations are reportable.

[See supporting procedures document – APPENDIX C](#)

Substance Misuse

Cumbria Constabulary is committed to the provision of a safe, healthy and productive working environment, and does not in any way condone the misuse of controlled drugs, whether illegal or prescribed, alcohol and other substances (solvents and gases).

Any instance of substance or alcohol misuse has the potential to impair judgement, which in turn has the potential to impact upon service delivery, public safety and the reputation of Cumbria Constabulary. The purpose of this policy is to deter substance misuse by all who are working for or on behalf of Cumbria Constabulary, in addition to minimise the chances of misusers entering the workplace as well as deterring all from misuse. To encourage those with issues to identify themselves and provide support to those who acknowledge their dependence and who are prepared to undertake a treatment regime. Screen those in safety critical posts and protect those vulnerable to malicious allegations.

The Health and Safety at Work Act 1974 clearly states that it is the responsibility not only of an 'employer' but also the 'employee' to protect themselves and others who may be affected by their actions. It is a criminal offence to put others at risk by negligent acts or omissions and this includes substance misuse.

Any individual involved in the misuse of drugs exposes themselves to vulnerability in terms of corruption, blackmail and integrity and potentially faces disciplinary and criminal consequences. The supply or use of any illegal drugs by any member of the policing family working in a vulnerable or safety/security critical role may upon investigation be classified as a criminal offence and may fall into misconduct.

The following controlled drugs are currently laid down in statute as being substances to be tested for under this policy:-

- Amphetamine (including ecstasy)
- Cannabis
- Cocaine
- Opiates
- Benzodiazepines.

Cumbria Constabulary reserves the right to alter this list in the event that further substances are identified as illegal by introduction of new statute.

Any drug testing laboratory used by Cumbria Constabulary must be specifically accredited for drug-testing work through appropriate national standards (UKAS and BSI).

[See supporting procedures document – APPENDIX D](#)

Lost ID Card

This procedure sets out the framework to be used by Police Officers, Police Staff and Volunteers representing Cumbria Constabulary in the unfortunate situation where the staff member has lost their identification card.

(Any reference to Volunteers includes: - The Special Constabulary, Police Support Volunteers and Cadets).

The procedure provides clarification of duties and responsibilities.

[See supporting procedures document – APPENDIX E](#)

5. Supporting Information

This policy and supporting procedures have been written giving due regard to the above legislation and has considered the risk of unfair and/or disproportionate impacts on individuals or groups (actual or perceived) and has done so via an equality impact assessment (EIA). This policy takes into account the most recent legislation at the time of writing unless there are any fundamental legal requirements that must be referenced which is included within.

This policy and supporting procedures have been written giving due regard to legislation and has considered the risk of unfair and/or disproportionate impacts on individuals or groups (actual or perceived) and has done so via an equality impact assessment (EIA).

6. Monitoring and Reviewing

The Policy will be reviewed every 3 years unless there is an earlier change in legislation /regulations which requires policy review after being agreed at the Constabulary Business Board.

The Head of People will be responsible for reviewing the policy.

The reviewer will

- Check relevant statistics, comments as necessary and where available, in order to identify any trends, issues or concerns
- Check that the Policy has been put into practice
- Check that the policy is being effective
- Verify that all of the elements are operating properly
- Verify that published procedures are being applied and complied with
- Ensure that the aims of the policy are achieved
- Monitor that the Policy does not discriminate against those with protected characteristics

In the event that an individual feels disadvantaged by the requirements of a Policy or Procedure or where they perceive there to be an impact which is intentionally or unintentionally unfair the matter should be dealt with in accordance with the **Policy and Procedure Review Process / Selection Process Appeals Procedure** contained in the Fairness At Work (Grievance Resolution) Policy and Procedure. This information will also be monitored and considered when reviewing the Policy.

7. Comments and Contact

All comments on how this policy can be improved are welcomed and should be forwarded to the Policy Owner at the correspondence address below:

Head of People
Corporate Support
Cumbria Constabulary Police Headquarters
Carleton Hall
Penrith
Cumbria
CA10 2AU

E-mail: PSDadmin@cumbria.police.co.uk

APPENDIX A – Anti Fraud and Corruption procedure



Anti Fraud and
Corruption Procedure

APPENDIX B – Business Interest and Additional Occupation procedure.



Business Interest and
Additional Occupator

APPENDIX C – Association Procedure -



Association
Procedure 2021.docx

APPENDIX D – Substance Misuse Procedure -



Substance Misuse
Procedure 21.docx

Appendix E – Lost ID Card Procedure



Lost ID Card
Procedure 2021.docx



[Cumbria Constabulary Anti-Fraud and Corruption Procedure](#)

Procedure:	Anti-Fraud and Corruption Procedure	
Approved by which board (or Chief Officer) and date:	Workforce Board May 7 th 2019	
Owner	Head of People	
For release under Freedom of Information?		Y
Supporting policy	Anti-Fraud and Corruption and Policy	
Contact for advice	Head of PSD	
Review date	July 2024	

Amendments made (Please detail the amendment(s) made and when)	Update of procedure
Date and Version Number	July 2021 2021 V2.0

This procedure supports the Cumbria Constabulary Anti Fraud and Corruption Policy, which is available for further clarification and guidance in the Constabulary’s Policy Library on the intranet.

Note: Cumbria Office of the Police and Crime Commissioner (COPCC) have a separate Anti Fraud and Corruption Procedure which applies to all COPCC staff.

Contents

1. **THE CHIEF CONSTABLE** - summary of approach towards fraud and corruption.
2. **WHAT IS MEANT BY FRAUD AND CORRUPTION?** – definition and examples of fraud and corrupt acts.
3. **POLICING CODE OF ETHICS (INCLUDING NOLAN PRINCIPLES of PUBLIC LIFE)**
4. **YOUR DUTY**- role and responsibilities for individuals.

5. **WHAT TO DO IF YOU SUSPECT FRAUD OR CORRUPTION** – practical guidance when a member of staff suspects fraud or corruption.
6. **WHAT TO DO IF A MEMBER OF STAFF RAISES CONCERNS WITH YOU-** practical guidance for managers when a member of staff reports a concern regarding fraud and corruption.
7. **ADVICE TO MEMBERS OF THE PUBLIC** – how to report concerns regarding fraud and corruption.
8. **KEEPING OF RECORDS** – responsibilities of Commanders and Directors to maintain registers of interests declared by their staff.
9. **SPECIAL INTERESTS** – Sec 117 of the Local Government Act 1972 responsibilities of individuals (in relation to contracts).
10. **LOCAL GOVERNMENT AND HOUSING ACT 1989 - POLITICALLY RESTRICTED POSTS (PORP)** – Sec 2 of the Local Government and Housing Act 1989 identifies posts where the post holder is subject to certain political restrictions.
11. **OFFERS and ACCEPTANCE OF GIFTS, GRATUITIES & HOSPITALITY** – guidance for members of staff.
12. **REVIEW OF THE ARRANGEMENTS** – Internal Audit review programme arrangements.
13. **ANTI FRAUD AND CORRUPTION STRATEGY** – details of the Anti Fraud and Corruption strategy in support of the policy.

1. **THE CHIEF CONSTABLE**

The Chief Constable has agreed a policy against Fraud and Corruption. In summary, the Chief Constable will not tolerate fraud or corruption in the administration of their responsibilities, and expect staff to take positive action wherever fraudulent or corrupt activity is suspected.

The Chief Constable is clear that Misconduct Procedures will be invoked where improper behaviour is indicated, if there is evidence of criminal behaviour this is prima facie gross misconduct requiring immediate action to be taken where suspension or summary dismissal are likely. A criminal investigation will always be pursued where evidence of criminal behaviour is evident.

The Anti Fraud and Corruption Procedure provide's guidance to all officers and staff to ensure adherence to the policy.

2. WHAT IS MEANT BY FRAUD AND CORRUPTION?

Fraud

Fraud can be broadly defined as the deliberate use of deception or dishonesty to disadvantage or cause loss (usually financial) to another person or party". (Fraud Advisory Panel 2015).

Corruption

"A Law Enforcement official commits an unlawful act or deliberately fails to fulfil a role arising out of an abuse of their position, for personal or perceived advantage having the potential to affect a member of the public". (IPCC/ACCAG definition)

3. YOUR DUTY

- To raise any suspicion of improper activity which indicates fraudulent or corrupt behaviour on the part of a colleague or an external third party to the Anti-Corruption unit via one of the mediums detailed below.
- The Public Interest Disclosure Act 1998 provides legal protection for employees who raise genuine concerns in relation to suspected fraud and corruption issues
- Not to discuss suspicions of improper practice other than with the Anti-Corruption Unit..
- Ensure any payments due to an employee are authorised by an independent member of staff
- Maintain controls that ensure functions involving the custody of resources are administered by two members of staff (for example the order and certification of receipts of goods; or the receipt and banking of cash).
- As a public servant, to assess the needs of the public, partners and our suppliers impartially, professionally and without personal prejudice and to determine the outcome of competitive situations with these same qualities.
- When private or personal interests arise in any matter which presents when at work, not to let those interests influence actions on behalf of Cumbria Constabulary. (The test is – "can I justify my actions if they become public?" If in doubt, consult your manager/supervisor).
- To adhere to the guidelines regarding 'Special Interests' and offers or acceptance of hospitality and gifts.

5. WHAT TO DO IF YOU SUSPECT FRAUD OR CORRUPTION

If you have reason to suspect fraud or corrupt activity on the part of a colleague, you should raise the matter as soon as possible with the Anti-Corruption Unit. This can be done by any of the following mediums:-

- Direct contact with a member of ACU staff, in person, by phone or via the PSD-ACUIntel mailbox
- Confidential reporting via the Confidential reporting mailbox, which is anonymous, accessible via Forcenet homepage

In ordinary circumstances, the above details are the normal points of contact for these issues in the Constabulary, however if an individual feels that concerns cannot be raised this way, then the following external organisations offer alternative confidential reporting methods. When contacting external organisations individuals must take care to ensure that *confidential information* is not disclosed.

- Protect (formerly Public Concern at Work) - a registered charity to assist, support and counsel individuals with concerns about colleagues 0207 404 6609
- Crimestoppers 0800555111

6. WHAT TO DO IF A MEMBER OF STAFF RAISES CONCERNS WITH YOU

If an allegation of fraud or corruption is made to you as a line manager or senior manager the following personnel must be consulted with a view to determining the appropriate investigative response and whether the Internal Auditor should become involved or a criminal investigation undertaken.

Police officers and police staff must contact the Anti-Corruption Unit

Arrangements will then be made to:

- Deal promptly with the matter.
- Record all evidence and intelligence received.
- Ensure the evidence is sound and adequately supported.
- Ensure the security of all evidence collected.

7. ADVICE TO MEMBERS OF THE PUBLIC

In the event of a member of the public becoming suspicious of fraudulent or corrupt within the Constabulary, the matter should be reported to the Anti-Corruption Unit in the first instance. Any information will be treated in confidence and can, if you wish, be provided anonymously.

8. KEEPING OF RECORDS

The Professional Standards Department maintain a central electronic register of offers of hospitality and gifts (see section 11 below) and details of whether they are offered and declined. This is accessed through the Constabulary's Forcenet – PSD home page. All recorded offers of hospitality and gifts are monitored by supervisors as part of the electronic workflow.

For a number of Constabulary posts, the police officer or member of police staff will be required to complete a Register of Interests Form (*A copy of the form is located in the Constabulary's Form Library which can be found on the homepage of the intranet*). This will apply to senior posts - all police officers attaining the rank of Chief Inspector and above, police staff of grade SO 1 and above and police staff with procurement responsibilities. The forms will be completed by the individuals to be submitted to the ACU via their line manager. It is important that the responses on completion of the form is done honestly and that it is updated if changes to an individual's circumstances occur.

On an annual basis as part of the completion of the statutory statement of accounts, the Constabulary is required to ensure that senior officers and police staff disclose transactions "between individuals or organisations who have the ability to influence or control the PCC or Constabulary (known as related parties) to declare the nature of such transactions". The financial services team will circulate a form to those officers and staff required to complete this annual disclosure around the financial year end (31 March), this form must be completed and returned as specified in the covering letter. This annual disclosure is in addition to any other disclosures required as part of this anti-fraud and corruption procedure and gifts/hospitality (section 11).

9. SPECIAL INTERESTS

The law (Section 117 of the Local Government Act 1972) specifically requires officers, employees and members to disclose in writing any financial interest (direct or indirect) which they may have in any contract the Chief Constable or COPCC has entered into, or may enter into, and prevents the acceptance of any fees or rewards whatsoever other than proper remuneration from their employer. The standards expected from staff are set out in the Joint Procurement Regulations.

Interests other than financial can be equally as important – and include for example, kinship, friendship, membership of a society or association, or trusteeship and so on. Again, the individual must judge whether the interest is sufficiently close as to give rise to suspicion, or create a perception that a transaction can give rise to suspicion, but it is always better to err on the side of caution than to deal with a challenge after the event. If a matter which involves such intangible interests arises at a meeting of the Chief Constable or COPCC in which you are a participant, you must orally disclose that interest and ensure that it is minuted in the record of the meeting.

10. LOCAL GOVERNMENT AND HOUSING ACT 1989 - POLITICALLY RESTRICTED POSTS (PORP)

Under section 2 of the Local Government and Housing Act 1989, a post will be designated as a PORP if it is either:

- A specified post;
- A post whose remuneration is or exceeds a specific level i.e. the equivalent of SCP44;
- A sensitive post.

Posts that have been designated as PORPs will include reference to this fact in the job description and post holders will be informed of the restrictions which apply.

The political restrictions:

- 1) Designation as a PORP means that the post holder is disqualified from election to a Local Authority or National and European Parliaments. (This does not include Parish or Community Councils).
- 2) Designation as a PORP also restricts PORPs from:
 - Candidature for public elected office (other than to a Parish or Community Council);
 - Holding office in a political group;
 - Canvassing at elections;
 - Speaking or writing publicly (other than in an official capacity) on matters of party political controversy.

Police Officers are subject to the restrictions placed on their private lives in accordance with Police Regulations 2003 which states : -

Members must abstain from any activity which is likely to interfere with the impartial discharge of duty or likely to give rise to the impression that the activity may do so. Police officers are also required not to take any active part in politics.

Membership of Certain Organisations

While the constraint on political activity does not prevent officers from being members of political parties in general, officers are banned from membership of the British National Party, Combat 18, or the National Front.

Other restrictions

Members must not reside at premises which are not approved by the chief officer. If a member is in provided accommodation, the chief officer's permission is required to have a lodger or to sub-let. If a member is in receipt of a rent or housing allowance, the chief officer must be given notice before the member has a lodger or sublets.

Members must not wilfully refuse or neglect to discharge any lawful debt.

Business Interests Incompatible with Membership of a Police Force If a member has, or proposes to have, a business interest, he/she must give written notice to the chief officer

who will determine whether or not the interest is compatible with the member concerned remaining a member of the force. The same applies if a relative included in the member's family has, or proposes to have, a business interest if the member believes it could be seen as interfering with the impartial discharge of his/her duties (Regulations 7 and 8 of Police Regulations 2003 apply).

11. OFFERS AND ACCEPTANCE OF GIFTS, GRATUITIES & HOSPITALITY

Considerations

The over-riding principle is the presumption that any offer of gifts, gratuities or hospitality are declined; however, the following considerations should assist police officers and staff in determining the boundaries of acceptability of any gift or hospitality . Think **G.I.F.T.**

Genuine: is this offer made for reasons of genuine appreciation for something I have done. Why is the offer being made, what are the circumstances, have I solicited this offer in any way or does the donor feel obliged to make this offer?

Independent: Would the offer or acceptance be seen as reasonable in the eyes of the public? Would a reasonable bystander be confident I could remain impartial and independent in all of the circumstances?

Free: Could I always feel free of any obligation to do something in return? How do I feel about the propriety of the offer? What are the donor's expectations of me should I accept?

Transparent: Am I confident that my acceptance of this offer will be subject to scrutiny by my force, colleagues, and to the public or was reported publically? What could be the outcome for the force if this offer was accepted or declined?

Applying consideration

To assist police officers and staff, line managers, the following guidance will assist in achieving a consistent approach in applying the considerations listed above, the following cases provide additional guidance.

A gift may be accepted if it is:

- of a trivial or inexpensive nature (for example, diaries, calendars, stationary or other small items offered during a courtesy visit or conference)
- a small commemorative items from visiting overseas law enforcement or governmental agencies or similar organisations

- a bona fide, unsolicited and inexpensive gifts of thanks from members of the public or victims of crime, which has been be offered to individual officers or teams in genuine appreciation of outstanding levels of service.

All such gifts should nonetheless be subject of a declaration and collated by the ACU via a Gifts and Gratuities Form.

[Home - Gratuities \(cumpol.net\)](http://cumpol.net)

A gift should not be accepted if it is

- from external contractors or companies tendering for work with the force or wider service cash payments (other than donations to specific police charities or police supported charities)
- a financial reward resulting from the publication of articles relating to the intended recipient's role or duties as a member of a police force
- a cash payment (other than donations to specific Police charities or Police supported charities).
- any alcoholic beverage

If there is any doubt, the items should be refused, and the principles outlined here apply equally if gifts are offered to your immediate family but might be perceived as being an inducement, given your relationship with the donor.

All such gifts should nonetheless be subject of a declaration in the force register.

Examples of gifts include (but are not limited to):

- Ceremonial gifts (for example, plaques, shields or glass or crystal ware)
- Confectionary
- Gift vouchers
- Stationery (for example, diaries, calendars, calculators, pens, etc)

Gratuities

A gratuity may be accepted if it is:

- an offer or discounts negotiated through the Police Federation, The Superintendents' Association, or other staff association or trade union
- discounts to public service workers including members of the police service offered on the basis that the organisation in question has a large customer base of a trivial or inexpensive nature (and the force has given explicit approval for such an offer)

- free travel arrangements for officers and staff if approved and formally negotiated through the Travel Concession Policy
- There should be no requirement to declare any such gratuity in the force register.

Gratuities which amount to individual gain from a points scheme when purchasing items or fuel are not acceptable (such as using a store loyalty card when purchasing goods on behalf of the force).

Accepting Hospitality

Hospitality may be accepted if it:

- extends to the impromptu provision of light refreshments during the course of policing duties
- is a conventional meal provided during the course of a working day by another police force or partner agency in either law enforcement or community safety. There should be no requirement to declare any such gratuity in the force register.
- is a conventional meal and is in accordance with the recipient's duties, for example attendees at meeting, seminar or conference organised by an external body; the annual dinner of a representative association or local authority which are limited to isolated or infrequent occasions and can be demonstrable in the interests of the force to attend. Such offers of hospitality should be declared in the force register.

Hospitality will not be acceptable if it:

- amounts to regular free or discounted food or refreshments whether on or off duty.
- Includes a degree of lavishness which is outside of the industry norm or is beyond any sense of common courtesy or reasonableness.
- includes any alcoholic beverage.

Such offers of hospitality should be declared in the force register.

Hospitality that could be considered excessive or might give the perception of influence should be avoided. Any hospitality received should not be greater than that which the organisation would reciprocate and which would be acceptable to the public as a use of public funds.

12. REVIEW OF THE ARRANGEMENTS

These arrangements will be included in the list of Risk Items from which the recurring review programmes of Internal Audit are selected.



BUSINESS INTEREST AND ADDITIONAL OCCUPATIONS PROCEDURES

Application Process

The application process for police officers and police staff is outlined below.

Applications should be made by way of the Application Form attached to this procedure.

Applications will be submitted via the individual's Line Manager for endorsement by the Territorial Policing Area (TPA)/Department.

The Head of Professional Standards Department has delegated authority from the Chief Constable to make the final decision to approve or refuse applications.

In determining whether or not a prospective business interest or additional occupation is compatible with the member concerned remaining a member of the police force, and to identify and assess any risk to force or service reputation, the Head of Professional Standards Department may take into account the perspective of Human Resources and the applicant's Departmental Head who may be best placed to identify and assess risk surrounding compatibility with the individual's role, duties and responsibilities.

In determining whether to approve an application for a business interest or additional occupation, the Head of Professional Standards will consider each case on its own merit taking into account the six impact factors found at Annex A.

The written application declaring business interest and additional occupation should include:

(1) The type of business/interest, the address of the premises involved and the details of any financial interest.

(2) Sufficient detail of the interest to enable a decision to be made regarding approval or not (general comments such as 'Property rental' will not be sufficient). This should include names of individuals who are renting the property in relation to the application.

(3) TPA / Department's observations on whether the interests would be compatible with the role or general position of office of constable or staff member and whether they are satisfied that the business interests will not interfere or affect their availability for duty or impose undue strain upon the member of staff.

Receipt of Notice

The Head of Professional Standards Department in consultation with others (as at para 5.5) shall determine whether or not the business interest in question is compatible with the individual's continued service in Cumbria Constabulary and will aim to notify the applicant in writing of this decision within 28 days of receipt of a fully completed application (which contains sufficient detail to enable a decision to be made).

The 28 day period will also include any decision made by the Head of Professional Standards Department to clarify anything contained in the application.

This period may be extended taking into account any consultation or clarification required to consider the application.

Should this date be extended the applicant will be informed of this along with an expected timescale for that decision.

Line Managers Responsibilities

Applications will be submitted via the line manager who will make reference to the applicant's current performance, sickness, attendance and any other health and safety considerations in their recommendations. Any "live" misconduct investigations should also be recorded at this stage.

Line managers should also take into consideration the individual's current role and their working hours (including any regular overtime) in deciding whether their business interest concern is likely to interfere with the individual's ability to perform that role.

Consideration should also be given to potential for concern in relation to any of the six NPCC defined areas for consideration (See Annex A of this document) and recorded on the application for the information of the TPA / Department.

The Role of the TPA / Department head

All applications will be submitted by the line manager to the TPA/ Department head, who will indicate their support or refusal of the application. Where the department concerned is split into different specialist units it may be appropriate for the application

to be routed via the individual's Head of unit for the endorsement. However final endorsement will still be required from the TPA/ Department.

The TPA/ Department, in giving their support, may recommend that approval is given subject to the imposition of appropriate conditions as per paragraph 10.0.

Any imposition of conditions should be seen as necessary to reduce any risk or concern that would have had the potential to result in a refusal of the application.

A meeting with the individual concerned may assist in resolving any areas of concern.

All applications whether supported or not will be sent to Human Resources and then forwarded to Central Services. The application will then be sent to the Head of Professional Standards Department.

The Role of the Head of Professional Standards Department

The Chief Constable has delegated authority for determining business interest and additional occupations applications to the Head of Professional Standards Department.

The decision to approve or refuse an application should be made within 28 days of receipt of a fully completed application by the Head of Professional Standards Department in consultation with those as at para 5.5.

The dates for this decision may be altered as per paragraphs 6.3 and 6.4.

All supported applications will be considered for final approval or refusal by the Head of Professional Standards Department.

Any applications not supported at TPA or Departmental level will be reviewed by the Head of Professional Standards Department to ensure consistency / corpocracy across the organisation.

Any decision made by the Head of Professional Standards Department should be in line with the NPCC guidance principles and Joint Circular 54/11 relating to Standards of Professional Behaviour.

If the application is not being supported at TPA or Departmental level then the Head of Professional Standards Department will consult with the TPA/ Department prior to making the final decision to approve or refuse the application.

In exceptional circumstances, if a decision cannot be agreed, then the application may be remitted for determination by the Chief Officer team.

The Head of Professional Standards Department may feel it necessary to clarify issues with the applicant or Line Manager prior to the approval or refusal of any application.

Any approved application may be subject to conditions.

Where the Head of Professional Standards Department decides to refuse an application then this may be the subject of an appeal by the individual concerned as outlined in Section 5 of the Business Interest and Additional Occupations Policy (How to Appeal).

Conditions

Cumbria Constabulary may wish to apply conditions even if it has consented to an individual having business interests or additional occupation. The specific conditions, necessary to ensure that Cumbria Constabulary's position is protected, will depend on the particular circumstances of each case and the individual.

However, the following general conditions will apply to all cases as a minimum:-

- i. Individuals should under no circumstances undertaken private work (whether paid or unpaid) for submission to or related to the Police and Crime Commissioner unless specifically requested to do so by the Chief Constable.
- ii. Individuals must not carry out any work related to a business interest or additional occupation (including accepting or making telephone calls) during normal working hours.
- iii. Individuals must not in the course of pursuing business interests or additional occupation use the Force's facilities or equipment or confidential information obtained from the Force or the Police and Crime Commissioner.
- iv. All approvals will be subject to a review (and possibly withdrawal of the interest) in the light of information received.
- v. Notwithstanding (iv) the Business Interest will be subject to an annual review.
- vi. If the Business Interest materially changes prior to the annual review it is the responsibility of the member of staff to submit a new Application Form outlining those changes and requesting continuance of the approval.

Recording & Monitoring Process

Central Services will be responsible for recording all applications whether approved or refused.

The hard copy application will be retained within the Central Services Department with a copy attached to the individual's personal file. The application together with any documentation subsequently generated in connection with an approved interest e.g. review papers or changes in interest notifications will be retained for seven years from the date the individual concerned leaves the Force.

This is deemed necessary should the need arise to respond to any complaint or civil claim related to the individual and their business interest.

Once a decision has been made by the Head of Professional Standards Department a certificate of approval/refusal will be sent to the applicant.

The certificate of approval will indicate any conditions that have been placed on the interest being approved that require compliance by the individual and/or their TPA or Department. The certificate of refusal will include the reasons that decision has been made.

The individual shall retain a copy of the approval certificate and the original should be signed by both them and their Line Manager and returned to the Central Services Department. The certificate of refusal will contain the individual's right of appeal which should be made by way of submission on the Appeal Against the Decision to Refuse Business Interest and Additional Occupation.

Where an application has been approved the applicants Line Manager should take necessary steps to ensure that the member of staff is complying with the guidance contained within the Working Time Regulations 1998. This may involve discussions during SBC and / or Management meetings.

Where there is concern regarding the number of hours worked by the member of staff in relation to their role with Cumbria Constabulary **and** their Business Interest this may trigger a review of the Business Interest.

Cumbria Constabulary will publish anonymous information on their website regarding types of business interests held by officers / members of staff together with the numbers of interests held by each rank / scale.

Reviews & Notification of Changes to Interest

It is the individual's responsibility to annually submit the Amendment / Annual review of the Business Interest and Additional Occupation Form to gain continued approval of a Business Interest. This should be done at annual SBC or SBC review dates.

This should also be submitted if the Business Interest changes in anyway prior to the annual review. This will include notification that the Business Interest is no longer necessary / valid and also notification that the applicant's role has changed since the original application / approval.

A notification will also be forwarded to the individual, and their Head of the TPA/ Head of Department, to remind them of the need to submit an annual application.

The notification will be generated by the Central Services Department.

The review will be progressed in the same manner as an original application i.e. via Line Manager and the TPA / Head of Department.

Should there be no material change in the circumstances of the Business Interest then approval will be given by the Head of Professional Standards Department without any consultation required as at para 5.5.

However, if there is a change in the circumstances of the Business Interest and / or the role of the applicant since the original application and approval then the review will be considered by the Head of Professional Standards in consultation as at para 5.5.

Where the annual review raises concerns that the individual has failed to comply with this policy and procedure or that the interests may be interfering with the discharge of their duties then this should be brought to the attention of the TPA / Head of Department.

Failure to submit the annual application may lead to the Business Interest and Additional Occupation approval being withdrawn by Cumbria Constabulary.

A review of a Business Interest and Additional Occupation can also be triggered at any time in the following circumstances –

There is concern that the business interest may be interfering with, or affecting -

1. The individual's performance whilst at work or health,
2. The health and safety of any person whilst the individual is at work,
3. The individual's ability to meet the Standards of Professional Behaviour

A review of a Business Interest and Additional Occupation may also be triggered if the Business Interest changes in any way.

Where there is concern in relation to the continuation of a Business Interest at TPA or Departmental level the Head of Professional Standards Department must be informed to enable the issue to be raised.

Business Interests and Additional Occupation prior to appointment to Cumbria Constabulary

A person appointed to Cumbria Constabulary must make application to continue a Business Interest and Additional Occupation held prior to their appointment and must inform the Force if a relative, included in their family, has a business interest.

Guidance on Incompatible Business Interests and Additional Occupations.

Applications for the granting of a business interest or additional occupation are decided on a case by case basis involving careful consideration of a number of factors including the nature of the business interest or additional occupation and the current role and responsibilities of the applicant. Appropriate Officers (those with delegated powers from the chief officers as decision makers, usually the Head of Professional Standards) should start from the premise that only those business interest or additional occupations that are compatible with the ethos and values of the police service will be permitted and will give careful consideration to the potential for adverse reputational damage to the service arising from any perception of any shortfall in the integrity of a member of a police force being associated with the prospective interest or additional occupational.

Once satisfied there are no adverse reputational matters or conflicts of compatibility with the values and ethos of the police service, Appropriate Officers should start from the presumption that an application for a business interest or additional occupation will be granted unless there is sufficient justification for it to be rejected and will determine whether conditional approval may be warranted. The reasoning behind any imposition of conditions or any outright rejection must be fully recorded.

It is not possible to provide a definitive list of specific occupations, interests or activities that are likely to lead to an application being rejected because of the need to consider each case on its merits and to assess the risks involved. The following framework is intended to provide service-wide consistency of approach to the type of activities which are likely to lead to the rejection of an application. The list of activities and examples of specific jobs provided is not exhaustive. Equally it should not be assumed that an activity (other than the first) will automatically be rejected because it appears in the list below.

- Holding a licence or permit granted in pursuance of the law relating to liquor licensing, refreshment houses or betting and gaming or regulating places of entertainment within the force area (all of which are specifically covered by Regulation 7 of Police Regulations 2003);
- working in licensed premises where they would a conflict of interest with policing duties or with the specific work carried out by a police staff employee;
- an activity that would present a conflict of interest in the administration of justice (e.g magistrate, practising solicitor, barrister, fine enforcement officer);
- an activity that involves investigation for other than policing purposes (e.g loss assessor, private detective);
- an activity that mirrors police responsibilities or is an extension of police functions (e.g close protection, private security or surveillance, crime prevention or personal safety);
- an activity that is connected with the lending of money or recovery of debts for others or an activity that involved “hard selling” to colleagues or members of the

public by placing undue pressure upon them to buy or rent, including recruiting others to sell on his or her behalf;

- an activity using specialist skills or knowledge obtained through the police service;
- renting accommodation from or letting accommodation to a member of staff who is in the same line management structure (excluding short-term arrangements, such as holiday lets);
- appearing in any commercial filming production in which they portray either a police officer, police community support officer or other uniformed role, whether on or off duty, or undertake any role where it could be construed that they are representing the police service;
- the writing and publication of books, articles or other material for gain by serving members of the police service about their policing or work experiences.

Additional Information in line with HMICFRS Integrity Review

Routine checks will be carried out by PSD if an application has been refused to ensure that any such refusal is being adhered to by the police officer or police staff member.

Checks will also be carried out by PSD with Procurement, Estates and FIB to confirm the suitability for such Business Interest and Additional Occupation applications.

Applications by Chief Officers

The same process applies to Chief Officers.

- The Assistant Chief Constable and the Deputy Chief Constable will submit their own personal applications to the Chief Constable for consideration.
- The Chief Constable will submit any personal application to the office of the Police and Crime Commissioner for consideration.

How to Appeal

If an individual wishes to appeal against any decision made by Cumbria Constabulary in connection with the policy they should write to the Deputy Chief Constable within 10 days of receiving the decision.

Appeal against Decision to Refuse Business Interest is available on the Force intranet for this purpose.

The Deputy Chief Constable will consider the appeal and consult with the appropriate Head of the TPA and Head of Professional Standards Department to establish all facts before making their decision. He/she will then respond to the individual within 28 days of receipt of the appeal. Should this period not be achievable the Deputy Chief Constable will notify the individual in writing and advise them when the decision will be communicated. It is good practice to provide written reasons for the decision within 7 days of the meeting.

There is no further right of appeal against the decision of the Deputy Chief Constable.

Complaints of alleged unlawful discrimination may be registered with an employment tribunal within 3 months less one day of the alleged act of discrimination subject to the appeal procedure being exhausted.

In addition, Cumbria Constabulary operates the "Fairness at Work Policy".

The main purpose of this policy is to ensure that individual members of staff who feel aggrieved about the way they have been treated either by management or by their colleagues are given every opportunity to have their grievances resolved in a fair and just manner. It is a flexible means of resolving problems at work and intended to resolve issues as quickly as possible.

Complaints about the overall policies and procedures of the Force as well as a number of other issues relating to quality of service or operational decisions should be made to the Chief Constable of Cumbria Constabulary at the following address:-

The Chief Constable,
Police Headquarters,
Carleton Hall,
Penrith, Cumbria.
CA10 2AU.

Application and appeal forms



Business interest
app.docx



Business interest
property rental.docx



Business interest
appeal.docx

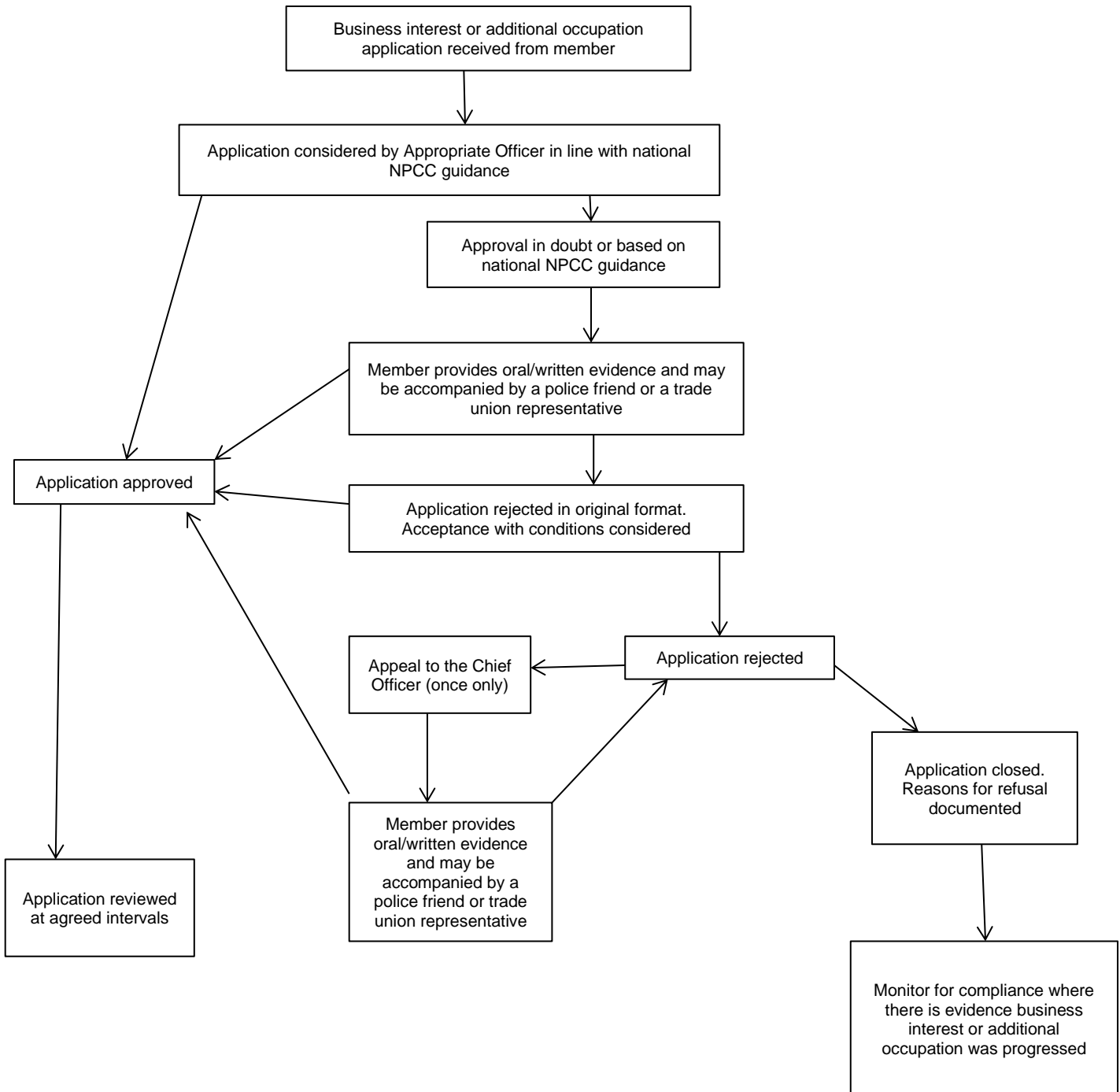


Business interest
renewal.docx



Business interest
certificate.docx

APPLICATION AND APPROVAL FLOWCHART





Procedure Template

Policy & Procedure:	Association Procedure	
Approved by which board (or Chief Officer) and date:	Workforce Board May 7 th 2019	
Owner:	Head of People	
For release under Freedom of Information?		Yes
Contact for advice:	Head of PSD	
Support information: (List any legislation, APP, other policies, etc. that this policy & procedure complies with)	Anti-Fraud and Corruption and Policy	
Review date: (Policy & Procedure must be reviewed every 3-years)	July 2024	

Amendments made (Please detail the amendment(s) made and when)	Update of procedure
Date and Version Number	July 2021 V 2.0

Procedure

It is the responsibility of each employee/third party member to declare vulnerable associations directly to the Professional Standards Department at the earliest opportunity. Where an individual has concerns that such an association may be inappropriate in that it carries these risks, or is unsure

of the antecedents of an individual, group, or organisation, they have a duty to bring it to the attention of PSD-ACU Intel via self-referral. This can be done via email to PSD-ACUIntel@cumbria.police.uk. The individual should minimise contact until they are updated by Professional Standards. This applies irrespective of whether these associations have been declared as part of any security clearance or vetting procedures.

Third Party Declarations

Where an officer, member of staff or third party becomes aware of, or suspects, an association between another officer, staff member or third party and an individual, group or organisation, which may be inappropriate, they should report this to their supervisor, line manager or directly via a staff association/Federation, ACU-Intel or anonymously via Confidential Reporting Mailbox.

Appropriate enquiries will be made by ACU-Intel and record made of all enquiries or checks, the reasons for them and the results. The enquiries may involve interviews with relevant individuals.

If the association is deemed to place the member of staff in a position of vulnerability (after research), a report will be provided to the Head of PSD and a Force Reputational Panel will convene. The Panel will comprise of Head of PSD, ACU-Intel, Legal Services, HR Manager and Area Commander/Head of Department. Any determination must be proportionate to the nature and circumstances of the association and may require some additional audit work to be undertaken over a specified time period. Any additional work undertaken must be documented and accountable.

A meeting will be arranged for the Panel to consider the report and will determine necessary safeguarding measures designed to safely mitigate risk to the individual and the Constabulary.

ACU-Intel will inform the individual of the outcome (via face to face or Teams/equivalent meeting) and provide a copy of any Determinations to them which they will be asked to sign/endorse confirming that they understand the contents. In certain circumstances, it may not be possible to hold face to face meetings and the determinations may be emailed to the individual and they will be asked to respond that they have received and understand them. Following this, the determinations will then be shared with their Area Commander/Head of Department and Supervisor.

The outcome will be recorded in ACU-Intel and Vetting. Notification sent to the Head of HR who will arrange for the staff member's personnel file to be flagged accordingly if necessary.

Any notifiable association will be monitored by the individual's Supervisor at performance/welfare review under the PDR/SBC or equivalent process. Should there be any changes to the association, the individual should inform ACU-Intel and their Supervisor.

Determination

A declaration of a reportable association will not necessarily prohibit any particular associations but will require a determination as to the threat and suitability of such an association.

The responsibility for making the determination of an identified or declared association lies with the Force Reputational Panel following input and recommendations from Territorial Policing Area Superintendents /Ops Superintendents or Head of Department and in the case of Departmental Heads or Operational Superintendents, the ACC.

Appeals against Determination

An individual member of staff subject of a determination will have the right to appeal. Appeals against determination should be submitted in writing (email is acceptable) within 14 days of notification to the Head of PSD.

They will then be referred to the ACC (or to the DCC when the ACC has been involved in the earlier decision-making); who will consider the appeal and make their determination based on the appeal report and the findings of any additional enquiries conducted. The notification of the appeal decision will be made within 28 days and conducted as per the determination notification.

Non-Compliance

Any non-compliance matters should be referred to ACU-Intel.

Where determinations have been made and the member of staff subject of them does not adhere to or observe them, then the conduct will be considered under the Police (Conduct) Regulations 2020 or as a disciplinary matter in respect of police staff in accordance with the Cumbria Constabulary Staff

Discipline policy Procedures. The Head of Professional Standards will consider the matter and decide on the most appropriate course of action. In the assessment of such breaches aggravating factors and mitigation will be considered and addressed on a case by case basis.

Data and Information Management

All reported associations and the related determination documentation will be managed by the ACU-Intel Team and disseminated to appropriate departments such as Vetting, HR.

In order to provide assurance to the organisation and its employees that sensitive data is managed appropriately and in accordance with legislative requirements, the system will be fully auditable and subject to independent oversight.



Substance Misuse Procedure

Policy & Procedure:	Substance Misuse Procedure	
Approved by which board (or Chief Officer) and date:	Workforce Board May 7 th 2019	
Owner:	Head of People Department	
For release under Freedom of Information?	Yes	
Contact for advice:	Head of PSD	
Support information: (List any legislation, APP, other policies, etc. that this policy & procedure complies with)	Anti-Fraud and Corruption Policy	
Review date: (Policy & Procedure must be reviewed every 3-years)	June 2024	

Amendments made (Please detail the amendment(s) made and when)	Update of procedure
Date and Version Number	11 th June 2021 V2.0

1. Introduction

Collection and screening of samples will be undertaken by suitably qualified and experienced staff using appropriate techniques to ensure the chain of custody is carefully controlled (set out in point 5 below). All samples will be collected, tested and analysed in line with the current guidelines. These personnel may be either direct employees of Cumbria Constabulary or contracted to an External Service Provider (ESP) who undertakes this function for Cumbria Constabulary.

Any drug testing laboratory used by Cumbria Constabulary must be specifically accredited for drug-testing work through appropriate national standards (UKAS and BSI).

2. Aims

Any instance of substance or alcohol misuse has the potential to impair judgement, which in turn has the potential to impact upon service delivery, public safety and the reputation of Cumbria Constabulary.

3. Guidance

This procedure will primarily be used by the People Department

Cumbria Constabulary seeks to maintain the highest Professional Standards. Consequently, in line with the Code of Ethics, all employees are actively encouraged to report any concerns they have about their colleagues.

Given the high risk activities undertaken by employees of Cumbria Constabulary and the statutory requirement to provide safe systems of working, it is recognised that the misuse of legal substances such as prescribed medication has the potential to impact upon the delivery of a professional policing service. The persistent and prolonged misuse may be viewed as a serious disciplinary offence.

Voluntary Referrals

Individuals who voluntarily self-declare a dependency to either legal or illegal substances will receive support from Cumbria Constabulary to assist in rehabilitation. A self-declaration will not usually result in disciplinary action provided there is no evidence of serious criminal activity. Self-declarations made following notification to undergo pre-employment, pre-appointment, random or with cause testing, will not be regarded as a voluntary self-declaration and in these instances staff that test positive for illegal substances or misuse of legal substances will be subject to disciplinary action.

Following a Voluntary referral, The Force Medical Advisor will consider whether, on the basis of organisational need, the Head of Department / Chief Superintendent needs to be informed, particularly where a risk assessment is required to consider whether duties need to be modified on the basis of risk.

Confidentiality

Cumbria Constabulary will have due regard to protect privacy during the testing procedures and ensure testing is conducted in a sensitive manner. The force will also ensure that test results are handled in a secure and confidential manner. Records of test results will be retained in accordance with Data Protection legislation and principles.

However, there are some circumstances in which the interests of the proper administration of justice, may over-ride an absolute confidentiality. In particular, the Joint Operational

Instructions (JOPI), agreed between Association of Chief Police Officers (NPCC), and the Crown Prosecution Service (CPS) place on the individual officer a personal responsibility to declare any matter that may affect their credibility as a witness in a court case. In some circumstances, substance misuse on the part of an officer acting as a witness may have to be disclosed to the CPS, as the damage to the credibility of the officer as a witness may be a factor to be considered in a decision whether to proceed with a prosecution.

The personal responsibility under JOPI will be drawn to the attention of an officer, by the Chief Superintendent, at the time at which any self-declaration of a substance misuse problem is made. The need to make a declaration to CPS will not arise in every case; each should be considered on its own facts and merits. The Constabulary Policy – **The Revelation of Criminal, Misconduct and Discipline Findings to the Crown Prosecution Service** refers.

4. Application

Candidates subject to testing will be asked to disclose details of any medication being taken, which may need to be taken into account when considering the results of the test. This information will be seen only by staff from the OHU, the ESP, the testing laboratory and the Medical Review Officer (MRO) when conducting a medical review. It is important that information about medications taken prior to the test is recorded at the time of the specimen collection, and not at any later stage.

Substance Misuse testing methods are detailed below:-

Random Testing

Random testing will be undertaken by collection of both a **urine and a breath** sample. Those required to undergo random testing will be required to provide a sample of urine to an approved external contractor using appropriate sample collection kits and will cover the following substances:

- Misuse of Drugs Act 1971
- Psychoactive Substances Act 2016
- Medicines Act 1968

The breath sample will be taken using breath testing equipment capable of taking a measurement at the 13 microgrammes level, or blood equivalent. Anyone who provides a breath sample which is over 29mg% in blood / 13mg% in breath (Home Office Limit) but below 80mg% in blood, 35mg% in breath (Drink Drive Limit) will be removed from safety critical duties, a risk assessment will be conducted and s/he will be found alternative work for duration of shift.

The poor performance in failing this test will be managed by Senior Management Team. This will be subject to review. Officers and Staff who are tested and provide a sample of 80mg% in blood, 35mg% in breath or above, will be referred to Professional Standards for consideration of potential criminal matters. Nothing in this policy will prevent any action

being taken under the Road Traffic Act and this should be considered in these circumstances.

With Cause Testing

There will be occasions where a Manager has reasonable grounds to suspect that a Police Officer or member of staff is involved in illegal drug misuse, alcohol misuse, or intelligence or information may be received about such activities. For 'cause' to be established the test of 'reasonable suspicion must be satisfied'

Such cases will be discussed with the Head of Professional Standards, who will consider what action if any needs to be taken, which may include a 'With Cause' test. Each case will be considered on individual merits.

Tests will be undertaken without prior notice and may be undertaken by either trained police staff or an approved, qualified, external provider using breath testing or urine sampling methodologies. The decision to use these samples will be at the discretion of the Head of Professional Standards Department. In all cases, samples will be collected using appropriate sample collection kits.

The urine sample will cover the same substances as Random Testing, plus one other specified controlled substance based on intelligence leading to reasonable cause to suspect the officer/staff member has used the substance in question. The candidate to be tested will be notified which substances are to be tested for.

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Refusal by the candidate to undergo a 'With Cause' test or failure to provide a suitable sample will be treated in the same manner as a positive result and may lead to disciplinary proceedings that may result in dismissal.

Where a candidate is required to undergo a 'With Cause' test, they may request that they are accompanied by a work colleague, the unavailability of a work colleague will not prevent the 'With Cause' test from proceeding.

Police Officers may be recalled to duty whilst on annual leave, sick leave, suspension or career break for the purpose of conducting a 'With Cause' test.

Failure to attend when ordered to do so will be treated as a failure to provide a suitable sample and will lead to disciplinary proceedings that may result in dismissal.

[See Annex B and C for relevant forms](#)

Post Offer Medical Screening

Post offer medical screening is required for all potential recruits, inc Specials and PCSO's; this will include mandatory drug testing using a urine sample. All offers are conditional to medical clearance – including drugs testing.

Transferees from other forces may be subject to medical and drug testing based on individual assessment.

Refusal to participate in drug testing will mean that the candidate will not be considered for employment by Cumbria Constabulary and will result in a withdrawal of the conditional offer. Occupational Health Staff will be trained in specimen collection. Specimens will be sent to the external testing agency for independent testing. Results will be fed back to Occupational Health for advice on fitness for recruitment. Human Resources will inform individuals of the requirements of testing and the consequences of a positive test, the requirement will be included in all recruitment material / information

Current Police Staff need to be aware that if they test positive when applying to become a Police Officer this may be treated as a disciplinary matter which could have implications on their employment.

Police Officers applying for a transfer from other Forces, who are subject to drug testing need to be aware that any positive result would be fed back to their current Force which would be dealt with in accordance with their current Force's policy on 'Substance Misuse'.

Internal candidates who apply for vulnerable or safety/critical posts ([as per Annex A](#)) may be subject to drug testing. Refusal will preclude them from these posts.

Collection Process

The collection process is facilitated by the use of a special Chain of Custody collection kit. The documentation is provided by a multi-part duplicating form. The documentation is completed in the presence of the candidate who will sign to consent and confirm that the specimen is theirs and provide information about any medication taken during the previous three months. The sample will be sealed in the presence of the candidate.

Any information provided about medication taken by the candidate will be confidential to the testing laboratory, MRO and OHU. It will not be disclosed during any subsequent investigation by PSD without the consent of the candidate. Copies of the Chain of Custody form with the confidential medical information section excluded will be provided to PSD as part of an investigation into substance misuse on request to the OHU manager.

The urine testing kit used for Random and With Cause test has two containers and, after collection, the specimen is divided between the two containers and these are both labelled and sealed with tamper evident security seals in preparation for dispatch to the laboratory for analysis. Both specimen containers remain together for dispatch to the laboratory for analysis. One container, the 'A' sample, is used at the laboratory for drug analysis whilst the second, the 'B' sample, is stored at the laboratory under secure conditions, on behalf of the candidate, as a back up in case he/she wishes to challenge a positive laboratory result.

5. Secure Chain of Custody Collection

The general principles of Chain of Custody collection can be summarised as follows:-

- To ensure the the candidate understands the procedure
- To document medications taken by the candidate
- To maintain evidential integrity – the ‘Chain of Custody’
- To avoid cheating by the candidate (specimen dilution, adulteration, substitution etc)
- To allow the candidate to provide a specimen in appropriate circumstances (e.g privacy for urine collection)
- To adopt procedures that allow the candidate to have access to the specimen for independent analysis (e.g splitting the specimen)
- To allow the candidate to observe the whole procedure by which the specimen is packaged ready for transport to the laboratory
- To ensure that the specimen is untouched at any stage, thereby avoiding contamination
- To ensure that the specimen is sent to the laboratory in tamper-evident packaging

6. Medical Review

On arrival at the Laboratory the specimens and their packaging are examined to check that the security seals on the containers are intact, and that there are no other signs of tampering. Further checks establish that the Chain of Custody paperwork has been fully completed.

Once the sample integrity checks have been done, the ‘A’ sample is opened ready for drug analysis and the ‘B’ sample is stored under secure conditions on behalf of the candidate. If the laboratory analysis identifies one or more drugs in the specimen, further investigation is required.

The positive analytical results need to be interpreted in light of any factors that may provide a legitimate explanation for the presence of the drugs (e.g any medications taken by the specimen candidate in the days before the test).

This process is referred to as ‘Medical Review’ and is conducted by a Medical Review Officer (MRO) in case there is a need for a medical discussion with the candidate. The MRO reviews the evidence and arrives at an opinion as to the origins of the drugs identified, if their presence can be explained by the use of prescribed or proprietary medication the Constabulary will be advised of a ‘Negative’ outcome.

Where the result is negative, the candidate will be informed of this without delay by PSD.

If the presence of drugs in a specimen cannot be accounted for in this way, the Constabulary will be advised of a ‘Confirmed Positive’ outcome. The outcome reported will include details of the drug(s) identified.

In cases where there is any doubt, the overriding principle of the MRO is to give the benefit of that doubt to the specimen candidate.

7. Handling “Confirmed Positive” Results

Positive results will be forwarded by the MRO to PSD and reported to the Head of People Department.

- A confirmed positive result as part of the Police Officer recruitment process will be notified to the OHU who will in turn notify the Head of PSD/HR or nominated representative so that the candidate may be withdrawn from the recruitment process.
- A confirmed positive result from a candidate who had self declared a substance misuse problem prior to being tested will be reviewed by OHU to assess whether the result was consistent with rehabilitation treatment being undertaken. If this is the case then no investigation will take place and it will remain a welfare issue. If the result suggested that an agreed programme of rehabilitation was not being followed, the matter will be referred to PSD and an investigation will commence.

It should be borne in mind that a person may self-declare for one substance (e.g. cannabis) but test ‘positive’ for another (e.g. heroin). In such cases where, for example, the heroin has not been declared, PSD should investigate the matter, as this would not be classed as ‘self-declaration’ for the heroin.

- All other confirmed positive results will be referred immediately to PSD for action. PSD will notify both the candidate, their Chief Superintendent / Director of the result, and of any immediate action, including suspension from duty where appropriate in accordance with the Suspension from duty of Police Officers/Special Constables and Police Staff policy.

Any claim by the candidate to the Chief Superintendent/Director that there was a reason (other than a medical reason) for the positive result should be referred to PSD for investigation, disciplinary action may follow. Such claims would include any claim that a positive test was a result of the candidate having consumed unknowingly a ‘spiked’ drink.

8. Challenging a ‘Positive’ test result

The candidate has the right to challenge the results of a drug test using the second part of the split specimen (the ‘B’ sample). In the case of a challenge, the sealed ‘B’ sample will be sent to an independent accredited laboratory of the candidates choice. The candidate is required to meet the cost of the transfer and subsequent analysis, but these costs may be reimbursed in the event that the test on the ‘B’ sample is negative.

Annex A Vulnerable or Safety/Critical Roles

Anyone within the policing family who fall into any of the categories below are deemed to hold vulnerable or safety/critical roles. These roles are all subject to random testing. Any member who tests positive for drug use may be subject to disciplinary and criminal proceedings.

Safety Critical posts: any post in which impairment would pose a greater risk of harm to officers, staff or the public e.g Firearms, Drivers, POLSA

Vulnerable: under cover, close associations with criminals, contact with drugs or drug dealers, posts identified by the Chief Officer within each force as being vulnerable because of a specific responsibility for dealing with drugs.

Application to staff fulfilling same criteria as set out for officers.

Definition of Vulnerable or Safety/Critical Role:

1. Vulnerable Posts:
 - Undercover Officers
 - Drug Squad Officers
 - Test Purchase Officers

2. Safety Critical Posts:
 - Officers/Staff who come into contact with firearms
 - Officers/Staff Drivers (including Driver Training Instructors)
 - POLSA teams
 - Police Divers
 - Staff involved in maintenance activities for buildings, equipment or vehicles
 - Dog Handlers

Annex B – Substance misuse with cause notice to staff



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Annex C – Substance misuse authorisation form.



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ID Card Procedure

Procedure

Procedure:	Lost ID Card	
Approved by which board (or Chief Officer) and date:	Chief Superintendent Territorial Policing	
Owner	Head of PSD	
For release under Freedom of Information?		Yes
Supporting policy	Anti-Fraud and Corruption	
Contact for advice	PSD	
Review date	June 2021	

If changes have been made to existing procedures, you must complete the boxes below.

Amendments made	N/A
Date and Version Number	July 2018 version 1.00 June 2021 version 1.1

CUMBRIA CONSTABULARY LOST ID CARD PROCEDURE

Scope

1. This Procedure is applicable to:
 - ✓ Warrant Cards
 - ✓ Staff ID Cards
- ✚ Visitor Cards are issued daily. Any Visitor Cards found should be handed in to HQ Central Registry, or local station front desks as appropriate for logging against the record of their being issued.

Process

2. In the event of either of the above cards going missing out of normal office hours, HQ Comms should be informed as soon as the loss is discovered, by telephone using the 101 Service. In addition, the owner of the card MUST report the loss as soon as possible by e-mail, to BOTH
 - ✓ PSD Admin (psdadmin@cumbria.police.uk)
 - ✓ Their line manager
3. The e-mail must include FULL circumstances of the loss/theft.
4. PSD Admin will log the event on all relevant systems and advise the Records & Information Security Manager (RISM), of the loss as a security breach.
5. Depending upon the nature of the loss/theft, PSD Admin will then contact CSD to arrange issue of a replacement card.
 - ✓ It follows that CSD will require PSD Admin confirmation for ALL replacement Warrant Card and Staff ID Card issues.
 - ✓ In some circumstances, issue of a new card may involve a new photograph being taken.

Card Found Process

6. In the event of the card later being found again, the owner (or finder) MUST contact PSD Admin to advise them of its recovery.
7. PSD Admin will then advise the Records & Information Security Manager.
8. The found card should be securely disposed of either by return to the RISM, or (depending on location) in accordance with local arrangements using the approved contractor 'Shred-It'.



Joint Audit Committee

Review of Terms of Reference and Role Profiles

Joint Audit Committee: 17 November 2021

Originating Officer: Michelle Bellis, Deputy Chief Finance Officer,

1. Introduction

- 1.1. On an annual basis the Joint Audit Committee review key governance documents on a cyclical basis. At the September 2018 meeting of the committee, it was determined that the Terms of Reference (ToR) for the Committee and Role Profiles for the Committee Chair and Members should also be subject to a 3 yearly cyclical review. This document provides a review of the ToR and Role Profiles.
- 1.2. The ToR document is consistent with the 2018 version of the CIPFA publication *“Audit Committees: Practical Guidance for Local Authorities and Police”*.
- 1.3. The documents appended to this report are largely as they were presented in 2018, the only change being to remove gender references within the document so that he/she and him/her have been replaced with they or their.

Appendix A – Joint Audit Committee - Terms of Reference

Appendix B – Role Profile Chair of Joint Audit Committee

Appendix C – Role Profile Member of Joint Audit Committee

2. Recommendations

- 2.1. Committee members are asked to review the attached documents and make any recommendations for changes.

Michelle Bellis

Deputy Chief Finance Officer

5 November 2021

Joint Audit Committee - Terms of Reference

1. Statement of Purpose

- 1.1. Our **Joint Audit Committee** is a key component of the Police and Crime Commissioner (the Commissioner) and Chief Constable's arrangements for corporate governance. It provides an independent and high-level focus on the audit, assurance and reporting arrangements that underpin good governance and financial standards.
- 1.2. The purpose of our **Joint Audit Committee** is to provide independent advice and recommendation to the Commissioner and Chief Constable on the adequacy of the governance and risk management frameworks, the internal control environment and financial reporting, thereby helping to ensure efficient and effective assurance arrangements are in place. To this end the committee is enabled and required to have oversight of, and to provide independent review of, the effectiveness of the Commissioner's and Chief Constable's governance, risk management and control frameworks, its financial reporting and annual governance processes, and the arrangements for both internal audit and external audit.
- 1.3. These terms of reference will summarise the core functions of the committee in relation to the Office of the Police and Crime Commissioner (OPCC) and the Constabulary and describe the protocols in place to enable it to operate independently, robustly and effectively.

2. Governance, risk and control

The committee will provide advice and recommendations to the Commissioner or Chief Constable in relation to the following areas:

- 2.1. Review the corporate governance arrangements against the good governance framework, including the ethical framework and consider the local code of governance.
- 2.2. Review the annual governance statements prior to approval and consider whether they properly reflect the governance, risk and control environment and supporting assurances and identify any actions required for improvement.
- 2.3. Consider the arrangements to secure value for money and review assurances and assessments on the effectiveness of these arrangements.

- 2.4. Consider the framework of assurance and ensure that it adequately addresses the risks and priorities of the OPCC and Constabulary.
- 2.5. Monitor the effective development and operation of risk management, review the risk profile, and monitor progress of the Commissioner and the Chief Constable in addressing risk-related issues reported to them.
- 2.6. Consider reports on the effectiveness of internal controls and monitor the implementation of agreed actions.
- 2.7. 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.
- 2.8. To review the governance and assurance arrangements for significant partnerships or collaborations.

3. Internal Audit

The committee will provide advice and recommendations to the Commissioner or Chief Constable in relation to the following areas:

- 3.1. Annually review the internal audit charter and resources.
- 3.2. Review the internal audit plan and any proposed revisions to the internal audit plan.
- 3.3. Oversee the appointment and consider the adequacy of the performance of the internal audit service and its independence.
- 3.4. Consider the Head of Internal Audit's annual report and opinion, and a regular summary of the progress of internal audit activity against the audit plan, and the level of assurance it can give over corporate governance arrangements.
- 3.5. To consider the Head of Internal Audit's statement of the level of conformance with the Public Sector Internal Audit Standards (PSIAS) and Local Government Application Note (LGAN) and the results of the Quality Assurance & Improvement Programme (QAIP) that support the statement – these will indicate the reliability of the conclusions of internal audit.
- 3.6. Consider summaries of internal audit reports and such detailed reports as the committee may request from the Commissioner or Chief Constable, including issued raised or recommendations made by the internal audit service, management response and progress with agreed actions.
- 3.7. Consider a report on the effectiveness of internal audit to support the Annual Governance Statement.

- 3.8. To consider any impairments to independence or objectivity arising from additional roles or responsibilities outside of internal auditing of the Head of Internal Audit. To make recommendations on safeguards to limit such impairments and periodically review their operation.

4. External Audit/External Inspection

The committee will provide advice and recommendations to the Commissioner or Chief Constable in relation to the following areas:

- 4.1. Support the independence of external audit through consideration of the external auditor's annual assessment of its independence and review of any issues raised by either Public Sector Audit Appointments (PSAA) or the auditor panel as appropriate.
- 4.2. Comment on the scope and depth of external audit work, its independence and whether it gives satisfactory value for money.
- 4.3. Consider the external auditor's annual management letter, relevant reports and the report to those charged with governance.
- 4.4. Consider specific reports as agreed with the external auditors/specific inspection reports e.g. Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), relevant to the Committee's terms of reference.
- 4.5. Advise and recommend on the effectiveness of relationships between external and internal audit and other inspection agencies or relevant bodies.

5. Financial Reporting

The committee will provide advice and recommendations to the Commissioner or Chief Constable in relation to the following areas:

- 5.1. Review the annual statement of accounts. Specifically, to consider whether appropriate accounting policies have been followed and whether there are concerns arising from the financial statements or from the audit of the financial statements that need to be brought to the attention of the Commissioner and/or the Chief Constable.
- 5.2. Consider the external auditor's report to those charged with governance on issues arising from the audit of the financial statements.

6. Accountability Arrangements

The committee will do the following:

- 6.1. On a timely basis report to the Commissioner and the Chief Constable with its advice and recommendations in relation to any matters that it considers relevant to governance, risk management and financial management.
- 6.2. Report to the Commissioner and the Chief Constable on its findings, conclusions and recommendations concerning the adequacy and effectiveness of their governance, risk management and internal control frameworks, financial reporting arrangements and internal and external audit functions.
- 6.3. Review its performance against its terms of reference and objectives on an annual basis and report the results of this review to the Commissioner and the Chief Constable.
- 6.4. Publish an annual report on the work of the committee.

7. Treasury Management

- 7.1. Review the treasury management policy and procedures to be satisfied that controls are satisfactory.
- 7.2. Receive regular reports on activities, issues and trends to support the Committee's understanding of treasury management activities; the committee is not responsible for the regular monitoring of activity.
- 7.3. Review the treasury risk profile and adequacy of treasury risk management processes.
- 7.4. Review assurances on treasury management (for example, an internal audit report, external or other reports).

8. Apprenticeship Scheme

- 8.1. To provide external scrutiny, challenge and recommendations with regard to apprenticeships delivered by the Constabulary as an employer provider to meet the requirements of the Education Skills Funding Agency (ESFA) and Ofsted.
- 8.2. Receive regular reports in relation to the annual self-assessment report and quality improvement plan.

Appendix B**Joint Audit Committee - Role Profile****Job Title: Committee Chair****1. Job purpose / key responsibilities - Chair**

- 1.1. The Chair of the committee is responsible for providing leadership to the committee in effectively discharging its duties and responsibilities as set out in the committee terms of reference.
- 1.2. Ensuring that the committee achieves its purpose of providing an independent assurance function for the governance, internal control, risk and financial and non-financial performance of the Constabulary and OPCC.
- 1.3. The Chair must create and manage effective working relationships among the committee, the Commissioner, the Chief Constable, Section 151 officer (Joint Chief Finance Officer) and both internal and external auditors.
- 1.4. Meet separately with the Section 151 officer and External Auditor to discuss risk compliance and governance issues arising as a result of external or internal audit activity.
- 1.5. Act as the committee's spokesperson using their best efforts to see that the committee receives all material to be discussed at the meeting at least one week before the meeting to ensure sufficient time to review information.

2. Conduct of Committee Meetings

- 2.1. Act as the chair of each committee meeting ensuring the appropriate conduct of business in accordance with the committee terms of reference.
- 2.2. Conduct the business of each committee meeting in a manner which will result in all matters on the agenda being dealt with effectively and appropriately.
- 2.3. Propose the termination of discussion on any matter when they are of the opinion that the matter has been thoroughly canvassed and discussed and that no new points of view or information are being presented.
- 2.4. Attempt to achieve resolution of all issues discussed at the meeting in respect of which a decision is required and members express conflicting positions, views, or advice, but such attempt should in no way inhibit a member from maintaining a different position, view, or advice.

- 2.5. Ensure that all members who wish to address a matter at a meeting are afforded a reasonable opportunity to do so.
- 2.6. In any case where a member of the committee has an interest or potential conflict in respect of a matter to be discussed at a meeting, arrange for that member to excuse themselves from all or a portion of the committee discussion.

3. Committee Culture

- 3.1. Provide leadership in promoting and supporting a committee culture characterised by:
 - i) The willingness of each member to use their best efforts in carrying out their duties as a member of the committee;
 - ii) The committee's insistence on the highest level of integrity accountability and honesty in the actions of the committee and of the Commissioner, Chief Constable and the other officers of the OPCC/Constabulary;
 - iii) Respect and dignity among the members, officers and the external and internal auditor;
 - iv) The candid and timely sharing of information among the members of the committee, management and the external auditor;
 - v) Acceptance by all members of the committee of the right of every member to hold and express a dissenting opinion; and
 - vi) A commitment to best governance practices and standards practices.

4. Miscellaneous Matters

- 4.1. Assist the committee and management to understand and respect the responsibilities of each.
- 4.2. Whenever necessary or desirable, to facilitate the effective performance of the committee's duties, attend other meetings and committees including those to facilitate governance of the internal audit shared service.

Joint Audit Committee - Role Profile

Job Title: Committee Members

1. Job purpose / key responsibilities – Committee Member

- 1.1. To contribute to the effective discharge of the duties and responsibilities of the committee as set out in the committee terms of reference.
- 1.2. To maintain effective working relationships with committee members, the Police and Crime Commissioner, the Chief Constable, Section 151 officer (Joint Chief Finance Officer) and both internal and external auditors.
- 1.3. To be diligent in preparing for committee meetings and making an effective contribution to those meetings to provide independent assurance of the governance, internal control and finance, risk and performance management arrangements of the OPCC and Constabulary.

2. Conduct of Committee Meetings

- 2.1. Contribute to the business of each committee meeting in a manner which supports all matters on the agenda being dealt with effectively and appropriately.
- 2.2. Address the committee on all matters where an opinion or decision is required and in such a manner that does not inhibit other members of the committee wishing to express a different opinion.
- 2.3. Advise the committee Chair where an interest or potential conflict of interest may exist in respect of a matter to be discussed at a meeting and act on the advice of the Chair.

3. Committee Culture

- 3.1. As a member of the committee, contribute to a culture that supports:
 - i) Each member to use their best efforts in carrying out their duties as a member of the Committee;
 - ii) The highest level of integrity accountability and honesty in the actions of the committee and of the Commissioner, Chief Constable and the other officers of the OPCC/Constabulary;
 - iii) Respect and dignity among the members, officers and the external and internal auditor;
 - iv) The candid and timely sharing of information among the members of the committee, management and the external auditor;

v) Acceptance by all members of the committee of the right of every member to hold and express a dissenting opinion; and

vi) A commitment to best governance practices.

4. Miscellaneous Matters

4.1. When necessary or desirable, to facilitate the effective performance of the committee's duties, attend other meetings and committees.

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Joint Audit Committee
17 November 2021
Agenda Item No 14



Annual Governance Statement 2021/22 Development and Improvement Plan Update

Introduction

This report is designed to provide members with an update on the progress made to date in respect of the action plans developed for both the Constabulary and the Office of the Police and Crime Commissioner as part of the production of the Annual Governance Statement (AGS).

The update is being provided to provide members with information regarding progress on the implementation of the AGS action plan for the OPCC and Constabulary.

The following appendices provide details of the actions included in the action plan, the target timescale for completion, current progress against the action and the lead officer responsible for that action.

- Appendix A – Annual Governance Statement Action Plan 2021/22 – Constabulary
- Appendix B – Annual Governance Statement Action Plan 2021/22 – OPCC

CUMBRIA VISION 25



LOCAL POLICING / WORKFORCE / SPECIALIST CAPABILITIES / BUSINESS SUPPORT / DIGITAL POLICING

Report Summary – Constabulary AGS (Detail included at Appendix A)

Summary of Actions	Constabulary	
	No	%
Actions included in the AGS	18	100%
Actions completed since last report	2	11%
Open Actions C/fwd	16	89%
Summary of Total Actions by Status		
Completed	2	11%
Ongoing (within original timescale)	10	56%
Ongoing (original timescale extended)	6	33%
Overdue/ timescale extended	0	0%
Not yet due	0	0%
Total	18	100%

Report Summary – OPCC AGS (Detail included at Appendix B)

Summary of Actions	Constabulary	
	No	%
Actions included in the AGS	14	100%
Actions completed since last report	3	22%
Open Actions C/fwd	11	78%
Summary of Total Actions by Status		
Completed	3	22%
Ongoing (within original timescale)	8	57%
Ongoing (original timescale extended)	3	21%
Overdue/ timescale extended	0	0%
Not yet due	0	0%
Total	14	100%

Constabulary AGS Action Plan 2021/22

Ref	B/fwd from 2020/21 (ref)	Action	Lead Officer	Implementation by	Action Update as at 31 October 2021	Revised Implementation Date	Status
		Core Principle A: Focusing on behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law.					
CPA/1	CPA/3	Finalise setting up of a Digital Ethics Panel and embed its operation.	Chief Superintendent DDaT	31st March 2022	The data ethics panel started in January 2021. Numerous meetings have been held. The group focuses on the innovative use of data through technology e.g. AI and power apps etc so both data and technology are effectively covered by the group.		Ongoing (within original timescale)
		Core Principle B: Focusing on ensuring openness and comprehensive stakeholder engagement.					
CPB/1		Implement a new Constabulary website	Head of Marketing and Communications	30th September 2021	This has been completed and the website went live on 6th October 2021		Completed
CPB/2		Implement an enhanced Constabulary intranet site	Head of Marketing and Communications	31st March 2022	On track	On track	Ongoing (within original timescale)
CPB/3	CPB/2	Understand the lessons learned from the pilot of the new policy management arrangements, make adjustments as required. Implement a prioritised plan for all Constabulary policies.	Superintendent Performance and Policing Futures.	30th September 2021	<p>All existing policies have been commissioned for a full review and update which occurred in May 2021. To date, 77% have been reviewed with the remaining 23% either being subject to national changes (non-amendable locally); or are ongoing with a completion date of prior to the new year.</p> <p>As a consequence of this work, a process is also being developed to manage all organisational policies within the Insight and Performance Command. When documented this will be consulted upon and presented to Operations Board for agreement. Essentially, when a policy or procedure requiring updating approaches the 6 month expiry timescale, a notification will be sent to the thematic lead advising of the same, a further at 3 months (at which point Ops Board will be notified) and will ensure completion prior to the renewal date. In addition, a filter for updating the intranet will be the Insight and Performance command, to ensure the process is not circumvented. Estimated timescale for agreeing and implementing the process – January 2022.</p> <p>One final element of the lessons learned is the publication requirements for policies and procedures. A newly devised template which has been so far adopted (not generated) by HR generates duplication in the event that the policy is to be published locally. On the counter side, this template does allow searchability and ensures consistency of quality in the documents. Advice is being sought regarding the requirement to publish or otherwise and a decision will then be taken on whether to continue with the current, or develop a new template.</p>	31st March 2021	Ongoing (original timescale extended)

Constabulary AGS Action Plan 2021/22

Ref	B/fwd from 2019/20 (ref)	Action	Lead Officer	Implementation by	Action Update as at 31 October 2021	Revised Implementation Date	Status
		Core Principle C: Focusing on defining outcomes in terms of sustainable economic, social and environmental benefits					
CPC/1	CPC/1	Develop a Strategy for the affordable storage of digital data.	Chief Superintendent DDaT	31st December 2021	To be reviewed by the Head of DDaT (new in post).	31st March 2022	Ongoing (original timescale extended)
CPC/2	CPC/2	Conduct an options evaluation for and decide on future Estates provision in West Cumbria	Director of Corporate Support and Head of Estates and Fleet	31st December 2021	Long list of options has been produced, this has been shortened and evaluated against the strategic priorities agreed for the project. Preliminary results of the option appraisal have been presented to the board. Clarification on the operating model for West Cumbria is being sought, link to wider operational review, discussions planned with ACC in November.	N/A	Ongoing (within original timescale)
CPC/3		Implement a Covid Recovery and Renewal Programme to improve efficiency and exploit new ways of working arising from the pandemic.	Deputy Chief Constable / Chief Superintendent DDaT.	31st March 2022	To be reviewed by the Head of DDaT (new in post).		Ongoing (within original timescale)
		Core Principle D: Focusing on determining the interventions necessary to optimise the achievement of intended outcomes.					
CPD/1		Implement the Out of Court Disposal Framework including the Pathways Project	Chief Inspector Criminal Justice Unit.	31st March 2022	OoCD Framework was implemented at the same time as Forcwide Pathways Project (5th July), Pathways is a Three Year Project running to April 2024. To date Pathways have received 133 referrals (offenders) with 10% the current non compliance rate (those 10% default to caution or charge).		Ongoing (within original timescale)
CPD/2	CPD/1	Review systems and processes within the Control Room with a view to improving the quality of service including implementation of Call Back and Webchat functionality	Superintendent -Public Contact & Engagement	31st December 2021	Public Contact and Engagement Department Created April 2021. A review completed with an implementation plan, new operating model, and shift pattern introduced 28/06. Demand has remained steady with abandonment rate for 101 reducing from 33% prior to the new model to - 17% post implementation. Call answering time reducing from 4 minutes 25 seconds to 27 seconds. 999 demand has increased by 15%,however call answering rates have also improved. New methods of contact - web chat, new website, have implemented supporting the needs of the community. Call back currently not possible within SAAB SAFE, system upgrade by service provider January 2022, with progression of call back being undertaken - with a view to implement in Quarter 4 2021/22 Consolidation period underway - with further performance management improvements.	31st March 2021	Ongoing (original timescale extended)
CPD /3		Implement an evidence based Performance Management process, linked to a harm index with the aim of maximising the benefits from additional Op Uplift officers. This work will include development of greater analytical capability.	Deputy Chief Constable / Assistant Chief Constable	31st March 2022	The Performance Framework has been developed and is being used and COG have agreed the preparation of a business case for an uplift in analytical capability.		Ongoing (within original timescale)

Constabulary AGS Action Plan 2021/22

Ref	B/fwd from 2019/20 (ref)	Action	Lead Officer	Implementation by	Action Update as at 31 October 2021	Revised Implementation Date	Status
Core Principle E: Focusing on developing the entity's capacity, including the capability of its leadership and individuals within it.							
CPE/1	CPE/1	Continue delivery of the strategy to improve digital capability in the organisation and, deliver improvements to productivity	Chief Superintendent DDaT	31st March 2022	The DDaT strategy continues to enhance the constabulary digital capability, and is supported by a digital leadership programme. The strategy has enabled mobility, and officers access to the right data at the right times, in keeping our community's safe in Cumbria(through smart phones, power apps, and laptop roll outs), and also enabled other opportunities in supporting remote and flexible working for staff, through modern work spaces approach. This has supported the constabulary through the pandemic, and supported other opportunities, e.g. Estate strategy/futures. It has enabled significant innovation and partnership, e.g. Power App partnership with Cumbria, Durham, Tiski and Microsoft, which has initially saved £250k years on year(Pronto), other exciting partnerships are also progressing with Mark 43. During the last 12 months the Constabulary has delivered 33 Programmes(as opposed to average of 22 in previous years, increase of a third in terms of productivity). The Constabulary are being highlighted nationally(through NEP and PDS), as good practice in terms of the digital implementation, and is supporting other forces in terms of their development. We are in the process of reviewing and refreshing the DDaT strategy, to reflect the speed of innovation, opportunity, this will provide more focus on the life cycle of Data, and opportunities in how we manage and use data, following the constabulary investment in the IM restructure. This work is being facilitated by 3 planned DDaT SLT strategy days, the first of which has already taken place in October. The second is due in November and the 3rd in December for the finalised version to be rolled out in the early part of 2022.		Ongoing (within original timescale)
CPE/2		In conjunction with Higher Education partners, continue implementation the new PEQF arrangements for new officer recruits, with particular focus on developing year 2 and 3 programmes and a pre-join entry route for recruits with a Policing degree.	Head of Learning & Development	31st March 2022	<p>With our HEI delivery partner, UCLan, the Constabulary is approaching its third year of PEQF delivery (February 2022). We currently have 103 Officers in their first year across both the PCDA (47 Officers) and DHEP Programmes (56 Officers), of which 16 officers who were recruited in April 2021 are on the Detective Constable DHEP pathway.</p> <p>The second year Modules on both programmes have been developed and are starting to be delivered. There are 67 Officers in their second year (32 PCDA and 35 DHEP) and these officers have started to complete their second-year placements in CAST (CID), Community Hub and MSG (Mobile Support Group).</p> <p>The current focus is the development of the PCDA third year and the end point assessment for the apprentices. The first PCDA cohort starts their third year in February 2022, during which they will undertake a large research project on a subject of their choice which is approved by the Constabulary and UCLan.</p> <p>The Constabulary expects to see the first DHEP cohort complete in May 2022 and the first PCDA complete in February 2023. In partnership with UCLan, the Constabulary is also reviewing the first-year module delivery and assessment which is informed by student officer feedback, greater knowledge of the programmes now delivered and updates from the College of Policing curriculum. These changes are expected to be introduced for the DHEP programme starting November 2021.</p> <p>The Constabulary has developed the Pre-Join programme (the initial entry route for officers with a Degree in Professional Policing) and a small pilot course is due to start in January 2022, with a full Pre-Join cohort planned for September 2022.</p>	30th September 2022	Ongoing (original timescale extended)

Constabulary AGS Action Plan 2021/22

Ref	B/fwd from 2019/20 (ref)	Action	Lead Officer	Implementation by	Action Update as at 31 October 2021	Revised Implementation Date	Status
Core Principle F: Focusing on managing risks and performance through internal control and strong public financial management.							
CPF/1	CPF/1	Review the current risk management arrangements to ensure relevance and effectiveness	Superintendent Performance and Policing Futures.	31st December 2021	Consultation on these arrangements has been scheduled for post the HMICFRS PEEL Inspection, and remains in time to achieve the target date set.		Ongoing (within original timescale)
CPF/2	CPF/4	Implement Information Management Strategy and complete re-structure of the function.	Chief Superintendent DDaT	31st December 2021	The restructure and change programme around the IM function was approved in Aug 21 by COG. We have appointed an experienced Chief information Officer, to lead the function. The wider recruitment process is underway, led by the CIO. In terms of the strategy this will be amalgamated into the DDAT strategy in line with National Best practice, with appropriate plans supporting the strategy, see above DDAT action. The performance framework is being progressed, in line with the strategy work, this is due in draft in early 2022, together with other early recommendations around enablers, e.g. case management system, and a clear training and leadership plan, to support staff skills and function development (this is currently being led by a Chief Inspector working for the CIO).	31st March 2022	Ongoing (original timescale extended)
CPF/3	CPF/3	Further develop the strategic resource management performance framework to drive improvements in our use of resources, and ensure that the benefits of significant investment in change and ICT are delivered.	Chief Superintendent Insight & Analysis	31st December 2021	The constabulary has an established performance framework in place, the governance for this is at management board, this has been in place from early March 2021. There is a new benefits realisation process in place which is monitored by the performance and insight dept.		Completed
CPF/4		Introduce a revised Scheme of Delegation to empower managers.	Joint Chief Finance Officer	30th June 2021	A revised Scheme of Delegation has been produced and consulted upon. A small number of areas around the role of boards in people management are still outstanding. In the interim existing arrangements are being maintained.	31st December 2021	Ongoing (original timescale extended)
CPF/5		Implement the recommendations of the Achieving Financial Excellence in Policing action plan.	Joint Chief Finance Officer	31st March 2022	Progress is being made in a number of areas including continuous improvement in relation to the new finance system, efficiency and productivity planning and balance sheet reporting. Work is underway to develop training packages for non financial managers and business partnering, which are currently in the design phase.		Ongoing (within original timescale)
CPF/6		Implement recommendations arising from the Financial Management Code of Practice self assessment.	Joint Chief Finance Officer	31st March 2022	Crossovers with previous action. Work has started on a number of actions including balance sheet reporting and development of a re-invigorated Efficiency and Productivity Strategy. Work on the development of a resilience index, which was the principal area of non compliance is planned over the next few months.		Ongoing (within original timescale)

Office of the Police and Crime Commissioner Action Plan 2021/22

Ref	B/fwd from 2020/21 (ref)	Action	Lead Officer	Implementation by	Action Update 31 October 2020	Revised Implementation Date	Status
Core Principle A: Focusing on behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law.							
CPA/1		Develop a succession plan to ensure resilience and continuity of the membership and skills of the Ethics & Integrity Panel.	Governance Manager	28 February 2022	A recruitment process is currently running. Interviews are to be held on 24 November and successful applicants to take up posts in January 2022.		Ongoing (within original timescale)
Core Principle B: Focusing on ensuring openness and comprehensive stakeholder engagement.							
CPB/1	CPB2	Develop a communications and engagement strategy for 2021-24	Communications and Engagement Officers.	30 June 2021	A new strategy has been developed and is now in place.		Completed
Core Principle C: Focusing on defining outcomes in terms of sustainable, economic, social and environmental benefits							
CPC/1		Work with the newly elected Police & Crime Commissioner to develop a new Police & Crime Plan for 2021-2024	Partnership & Strategy Manager	31 December 2021	Following public and partner agency consultation, the draft Plan has been finalised and considered by the Police and Crime Panel, which was supportive of the Plan. The final Plan will be launched publicly shortly.		Ongoing (within original timescale)
Core Principle D: Focusing on determining the interventions necessary to optimise the achievement of intended outcomes.							
CPD/1		Develop a holistic approach for women services through the Women Centres.	Project Manager	31 March 2022	Developed to provide information, advice, support, training, education in a safe trusted space across the county in 3 locations, together with outreach North / South. Multiple challenges addressed over a wide range of issues such as health, violence, abuse, employment, education, rights & CJ issues. The services & activities provided by the Women's Centres vary according to need but include 1:1 holistic support, drug alcohol support, counselling, DA programmes, group work, courses & workshops, drop in sessions & signposting as required to specialist services. All 3 centres are working well individually & are supportive of each other.		Ongoing (within original timescale)

Office of the Police and Crime Commissioner Action Plan 2021/22

Ref	B/fwd from 2020/21 (ref)	Action	Lead Officer	Implementation by	00-Jan-00	00-Jan-00	00-Jan-00
CPD/2		Working with the Constabulary to reduce reoffending through the implementation of an Out of Courts Disposal Framework through the Pathways project.	Project Manager	31 March 2022	The Out of Courts Disposal Framework has been developed & implemented & the integrated offender management model "Pathways" launched in June 2021 with commissioned provider Remedi. Project Board has ceased & to mitigate any risk to either constabulary or OPCC replaced with a monthly performance meeting including Christy Laverack OPCC, C.I. Sherlock CJU lead, Insp. O'Hagan, PS Fitch / Andy Baines, Remedi area manager Dave Bates / Megan Wright & Dan Gilbert in relation to the performance metrics / power BI. This performance meeting is in addition to quarterly contract management reviews. Frequent dialogue between all key stakeholders which negates the need to wait for a formal meeting & has ensured effective working relations. Pathways to date has 140 referrals with equal spread of referrals across the county.		Ongoing (within original timescale)
CPD/3		Continue to deliver the Government's policy around Safer Streets	Safer Streets Co-ordinator	31 March 2022	Safer Streets 2 is being delivered in Workington. Safer Streets 3 is being mobilised in Whitehaven. Safer Streets 4 for Carlisle, the result has not yet been announced by the Home Office.		Ongoing (within original timescale)
CPD/4		Develop and commission an intervention for perpetrators of Hate Crime.	Partnership & Strategy Manager	31 October 2021	Following engagement with stakeholders via a series of workshops, market engagement was conducted to find a suitable provider for this pilot intervention, which proved challenging due to local provider capacity issues. It has now been commissioned and is in the process of being mobilised.	30 November 2021	Ongoing (original timescale extended)

Office of the Police and Crime Commissioner Action Plan 2021/22

Ref	B/fwd from 2020/21 (ref)	Action	Lead Officer	Implementation by	Action Update 31 October 2020	Revised Implementat Status
CPD/5	CPD/2	Continue to work in collaboration with Cleveland, Northumbria and Durham OPCCs and NHS England / NHS Improvement to jointly commission an integrated Sexual Assault Referral Centre (SARC) model across these areas.	Partnerships and Strategy Manager	31 December 2021	After working jointly with North East OPCCs, it was found that the best route to successfully getting a provider for Cumbria's SARC was to procure this separately. This process is currently underway.	Ongoing (within original timescale)
Core Principle E: Focusing on developing the entity's capacity, including the capability of its leadership and the individuals within it.						
CPE/1		Internal Audit of the OPCC's Agile Working arrangements.	Governance Manager	30 September 2021	IA completed and final report issued on 4 August 2021	Completed
CPE/2		Implement the recommendations from the 2021 PCC review	Chief Executive	31 March 2022	On track - PCC review 1 complete and awaiting the outcome from PCC Review 2	Ongoing (within original timescale)
Core Principle F: Focusing on managing risks and performance through internal control and strong public financial management.						
CPF/1		Review of governance structure and processes in preparation for the outcome of PCC Reviews.	Governance Manager	31 December 2021	Work has commenced on this review	Ongoing (within original timescale)
CPF/2		Consider the implications of local government re-organisation on the Office of the Police & Crime Commissioner and make recommendations to the Police & Crime Commissioner.	Chief Executive	31 August 2021	Subsequent to the Housing Secretary's announcement on 21st July 2021 to abolish Cumbria County Council and to create two new unitary authorities, the implications of LGR have been considered by the PCC and OPCC. Work is now underway to develop a business case and will submit a proposal to take on responsibility of fire governance.	Completed
CPF/3		Develop partnership arrangements with the Youth Endowment Fund to ensure access to future funding streams that helps to prevent the criminalisation of children	Partnership & Strategy Manager	31 March 2021	The OPCC has engaged with the YEF around potential areas for funding in the future and is currently looking at making a bid to support one of its schemes under the 'Supportive Home' funding round. The relationship will continue to be maintained into 2022 to take future opportunities.	Ongoing (original timescale extended)
CPF/4		Complete a self-assessment against the CIPFA Good Governance Guide for the Safer Cumbria Partnership to drive recommendations for improvement	Safer Cumbria Co-ordinator	30 November 2021	Work is scoped and ongoing, due for completion by 31st December 2021	Ongoing (original timescale extended)

Annual Commercial Solutions Report and Dashboard

Presentation to JAC

17th November 2021



 101

 www.cumbria.police.uk

  [cumbriapolice](https://www.facebook.com/cumbriapolice)



KPI's

Category Management



Cost Reduction - £200k declared at HO plus £40k pa custody, £12k pa confidential waste,



Reduced Risk - Risk register "under control" No significant risks



Improved Value - Improved Custody Medical spec & contract mgt, Rationalisation of stock, Collaboration with Bluelight

Pipeline Management



Improved Pipeline Coverage - Bluelight repository upto date with forward look



Improved Pipeline Reporting - Forward look available



Improved Pipeline Delivery - major projects (custody medical, consultants, OPCC) delivered in timely manner

Process and Procedure



Improved Process Efficiency and Quality - good use of Oracle fusion, single inventory system



Improved Process Data Quality - stakeholder, spend mgt, category mgt.



Improved Commercial Regulation Compliance - Assurance through CAB, Contract Mgt audit and current inventory audit

Improved Commercial Awareness Training



Improved understanding of Procurement, Policy, Processes and Tools. - few exemptions, collaborative working with stakeholders



Guidance - Handbook and stakeholder mgt working well.



Saved Time - *More for less*

Highlights

Audit – Contract Management, Creditors, Commercial Solutions and Inventory reports all demonstrate good progress. Inventory audit is in progress.

Oracle Finance and Procurement System - 1 year successful operational anniversary

Commercial transformation program complete

Collaborative working –
Working closely with
Bluelight and others.

Insights, Spend Analysis
and demand
management resulted in
£67k+ Cashable saving

Stores Performance re
PPE, uplift, Demand
Management

Contract Award Board-
Mature working

Risk Management –
Inflation, supplies

CIPS Apprentices – 5
achieved diplomas, 2
completed
apprenticeships

Category Management in
place

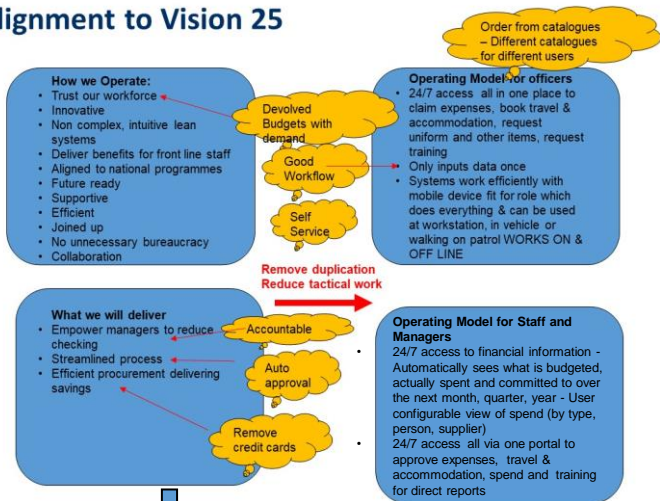
Savings: 19/20 = £350k, 20/21 = £916k, 21/22 ytd = £267k

Systems Implementation Journey

1



Alignment to Vision 25

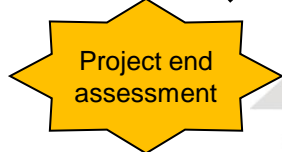


2



Project Delivery

3



Unsupported system:

- Cyber risks
- System failure
- Inability to continually improve and adapt working practices

Of 72 requirements:

- 43 Delivered
- 10 Delivered post go live before the Project closes
- 8 Partially delivered
- 1 Required more information
- 10 not delivered
 - 5 out of scope
 - 1 agreed not to use
 - 1 re costing model
 - 3 others related to system design

'must have' requirements (41)

- 29 Delivered
- 3 Delivered post go live before the Project closes
- 4 partially delivered
- 5 not delivered

4



Delivery of Enablers

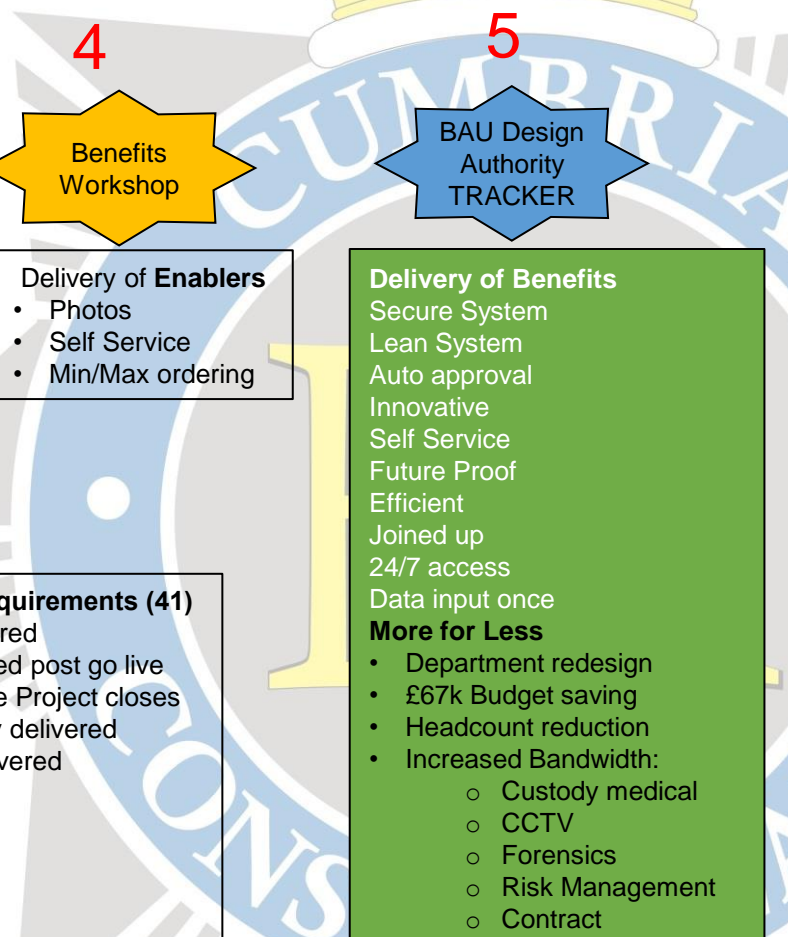
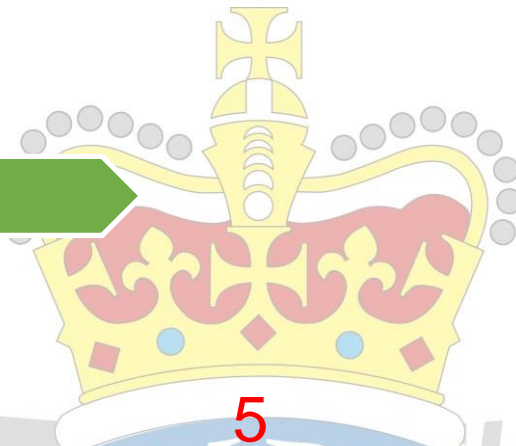
- Photos
- Self Service
- Min/Max ordering

5



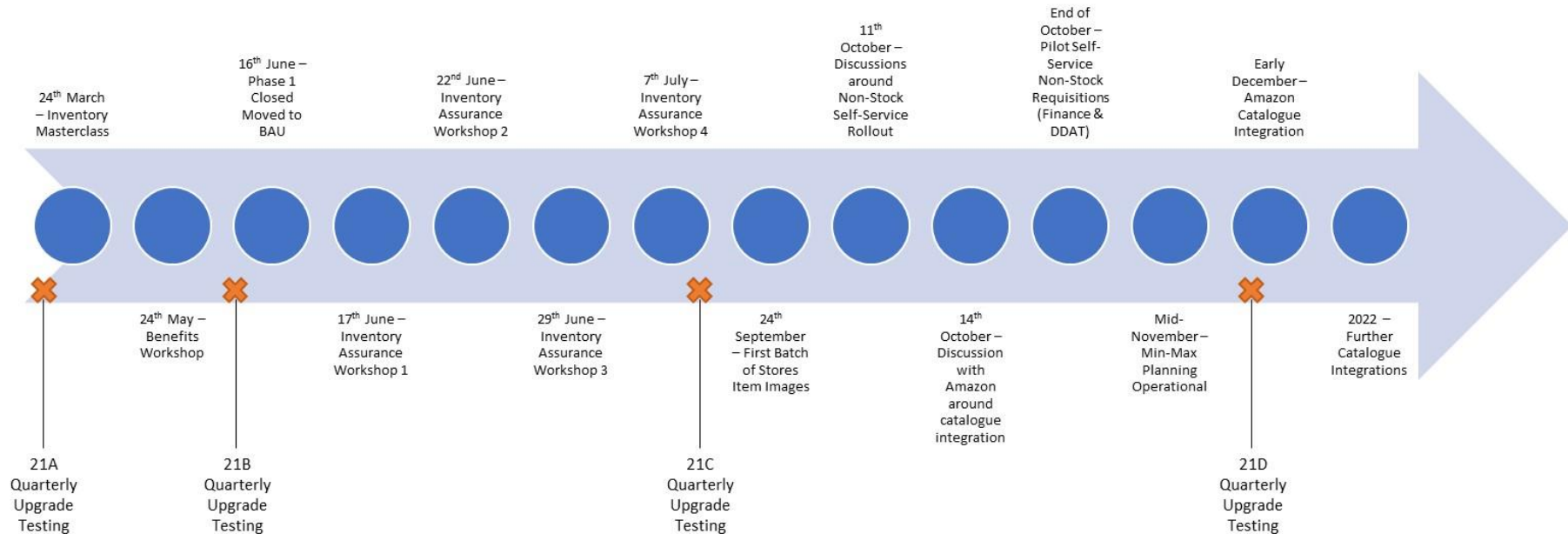
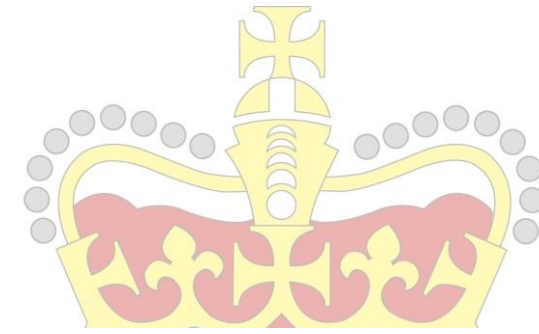
Delivery of Benefits

- Secure System
- Lean System
- Auto approval
- Innovative
- Self Service
- Future Proof
- Efficient
- Joined up
- 24/7 access
- Data input once
- More for Less**
 - Department redesign
 - £67k Budget saving
 - Headcount reduction
 - Increased Bandwidth:
 - Custody medical
 - CCTV
 - Forensics
 - Risk Management
 - Contract Management



Continuous Improvement

New features continue to be rolled out



The Police and Crime Commissioner for Cumbria

Treasury Management Activities 2021/22 for the period 01 April 2021 to 30 September 2021

Public Accountability Conference 03 November 2021 and Joint Audit Committee 17 November 2021



Cash flow Balances

Quarter one average daily balance - £11.303m
 Quarter two average daily balance - £28.151m
 Investment balance @ 30/09/21 £21.412m
 (up from £9.762m at 31/03/21).



Investment Interest Forecast

Base Budget - £10,000
 Revised Budget - £10,000
 Current Estimate - £2,000



Borrowing Strategy

No borrowing was undertaken between 01 April 2021 to the 30 September 2021 and none is expected during 2021/22.

Investment Strategy

Category	Category Limit (£m)	Investments at 30 Sep (£m)	Compliance with Limit
1 - Banks Unsecured	20	0.523	Yes
2 - Banks Secured	20	0.000	Yes
3 - Government (inc LA)	10	11.900	Yes
4 - Registered Providers	10	0.000	Yes
5 - Pooled Funds	15	8.988	Yes
Total		21.412	

There have been no breaches in the approved limits to report during the reporting period.

Performance Indicators

	Number of Days	Average Balance (£)	Largest Balance (£)
Quarter 1			
Days In Credit	91	4,259	34,621
Days Overdrawn	0	0	0
Quarter 2			
Days In Credit	92	37,604	326,209
Days Overdrawn	0	0	0

Average interest rate earned - 0.01%
 Average base rate - 0.10%
 (Current bank base rate - 0.10%)

Treasury and Prudential Indicators

During the period 01 April 2021 and 30 September 2021, the treasury function has operated within the treasury and prudential indicators set out in the Treasury Management Strategy Statement and in compliance with the Treasury Management Practices.

Compliance with the prudential and treasury indicators are shown on page 3.

Economic Outlook and Treasury position for the quarter ended 30 September 2021

Economic outlook and Interest Rate Forecasts

The Monetary Policy Committee (MPC) at the meeting on the 24th of September voted unanimously to leave Bank Rate unchanged at 0.10%.

In August the MPC's focus was on getting through a winter of temporarily high energy prices and supply shortages, believing that inflation would return to just under the 2% target after reaching a high around 4% in late 2021, now its primary concern is that underlying price pressures in the economy are likely to get embedded over the next year and elevate future inflation to stay significantly above its 2% target and for longer.

Financial markets are now pricing in a first increase in Bank Rate from 0.10% to 0.25% in February 2022, but this looks ambitious as the MPC has stated that it wants to see what happens to the economy, and particularly to employment once furlough ends at the end of September. At the MPC's meeting in February it will only have available the employment figures for November: to get a clearer picture of employment trends, it would need to wait until the May meeting when it would have data up until February. At its May meeting, it will also have a clearer understanding of the likely peak of inflation. With all this in mind the PCC's advisors, link Group, provided the following forecasts on 29 September 2021. As shown in the forecast table below, one increase in Bank Rate from 0.10% to 0.25% has now been included in quarter 1 of 2022/23, a second increase to 0.50% in quarter 1 of 2023/24 and a third one to 0.75% in quarter 4 of 2023/24.

Base Rate Estimates	2021/22	2022/23	2023/24
Quarter 1	0.10%	0.25%	0.50%
Quarter 2	0.10%	0.25%	0.50%
Quarter 3	0.10%	0.25%	0.50%
Quarter 4	0.10%	0.25%	0.75%

Strategy Limits

There have been no breaches in the strategy limits during the reporting period.

Category/Institution	Credit Rating	Investment Date	Investment Matures	Days to Maturity	Rate (%)	Amount (£)	Counterparty Total (£)
Category 1 - Banks Unsecured (Includes Banks & Building Societies)							
Svenska (Deposit Acc)	AA	Various	On Demand	N/A	0.00%	499,414	499,414
NatWest (Liquidity Select Acc)	A+	30/09/2021	01/10/2021	O/N	0.01%	24,000	24,000
						523,414	523,414
Category 2 - Banks Secured (Includes Banks & Building Societies)							
						0	0
Category 3 - Government (Includes HM Treasury and Other Local Authorities)							
Debt Management Office	Gov	06/08/2021	22/10/2021	22	0.010%	1,900,000	1,900,000
Debt Management Office	Gov	06/07/2021	29/10/2021	29	0.010%	2,000,000	2,000,000
Debt Management Office	Gov	06/07/2021	30/11/2021	61	0.000%	3,000,000	3,000,000
Debt Management Office	Gov	06/07/2021	24/12/2021	85	0.005%	3,000,000	3,000,000
Debt Management Office	Gov	07/09/2021	22/11/2021	53	0.010%	2,000,000	2,000,000
						11,900,000	11,900,000
Category 4 -Registered Providers (Includes Providers of Social Housing)							
None						0	0
						0	0
Category 5 -Pooled Funds (Includes AAA rated Money Market Funds)							
Invesco	AAA	Various	On demand	O/N	0.010%	1,890,000	1,890,000
BlackRock	AAA	Various	On demand	O/N	0.005%	2,000,000	2,000,000
Fidelity	AAA	Various	On demand	O/N	0.010%	2,398,245	2,398,245
Goldman Sachs	AAA	Various	On demand	O/N	0.000%	0	0
Aberdeen Standard	AAA	Various	On demand	O/N	0.010%	2,700,000	2,700,000
						8,988,245	8,988,245
Total						21,411,660	21,411,660

In July 2021 the police pension grant was received from the Home Office. Along with the July grant payment, the investments reached their highest balance of £34.171m. A large proportion of the pension grant was invested with the Debt Management Office (DMO) of HM Treasury to be returned at regular intervals as cashflow forecasts require, with the remainder being managed through the money market funds.

At the beginning of the pandemic the decision was made to temporarily exclude investments with Banks, Building Societies, and other Local Authorities. The anticipated risks to financial institutions potentially arising from the pandemic have not arisen, therefore short, fixed term deposits will be introduced with banks and building societies when funds allow.

Treasury and Prudential Indicators 2021/22 at 30 September 2021

Treasury Management Indicators		Result	RAG	Prudential indicators		Result	RAG
<p>The Authorised Limit</p> <p><i>The authorised limit represents an upper limit of external borrowing that could be afforded in the short term but may not be sustainable. It is the expected maximum borrowing need with some headroom for unexpected movements. This is a statutory limit under section 3(1) of the local government Act 2003.</i></p>	TEST - Is current external borrowing within the approved limit	YES	●	<p>Ratio of Financing Costs to Net Revenue Stream</p> <p><i>This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of revenue budget required to meet financing costs</i></p>	TEST - Is the ratio of capital expenditure funded by revenue within planned limits	YES	●
<p>The Operational Boundary</p> <p><i>The operational boundary represents and estimate of the most likely but not worst case scenario it is only a guide and may be breached temporarily due to variations in cash flow.</i></p>	TEST - Is current external borrowing within the approved limit	YES	●	<p>Net Borrowing and the Capital Financing Requirement</p> <p><i>This indicator is to ensure that net borrowing will only be for capital purposes. The commissioner should ensure that the net external borrowing does not exceed the total CFR requirement from the preceding year plus any additional borrowing for the next 2 years.</i></p>	TEST - Is net debt less than the capital financing requirement	YES	●
<p>Actual External Debt</p> <p><i>It is unlikely that the Commissioner will actually exercise external borrowing until there is a change in the present structure of investment rates compared to the costs of borrowing.</i></p>	TEST - Is the external debt within the Authorised limit and operational boundary	YES	●	<p>Capital Expenditure and Capital financing</p> <p><i>The original and current forecasts of capital expenditure and the amount of capital expenditure to be funded by prudential borrowing for 2021/22</i></p>	TEST - Is the current capital outturn within planned limits	YES	●
<p>Gross and Net Debt</p> <p><i>The purpose of this indicator is to highlight a situation where the Commissioner is planning to borrow in advance of need.</i></p>	TEST - Is the PCC planning to borrow in advance of need	NO	●	<p>Capital Financing Requirement</p> <p><i>The CFR is a measure of the extent to which the commissioner needs to borrow to support capital expenditure only. It should be noted that at present all borrowing has been met internally.</i></p>	TEST - Is the capital financing requirement within planned limits	YES	●
<p>Maturity Structure of Borrowing</p> <p><i>The indicator is designed to exercise control over the Commissioner having large concentrations of fixed rate debt needing to be repaid at any one time.</i></p>	TEST - Does the PCC have large amounts of fixed rate debt requiring repayment at any one time	NO	●				
<p>Upper Limit for total principal sums invested for over 365 Days</p> <p><i>The purpose of this indicator is to ensure that the commissioner has protected himself against the risk of loss arising from the need to seek early redemption of principal sums invested.</i></p>	TEST - Is the value of long term investments within the approved limit	YES	●				

The CIPFA (Chartered Institute of Public Finance and Accountancy) Code of Practice for Treasury Management recommends that regular reports are presented with regards to treasury management activities. This half yearly report ensures the Police and Crime Commissioner is implementing best practice in accordance with the Code.

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