For Information	
Public/Non-Public	Public
Report to:	Joint Audit and Scrutiny Panel (JASP)
Date of Meeting:	28th February 2022
Report of:	Deputy Chief Constable
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Agenda Item:	12

Audit and Inspection Update

1. Purpose of the Report

1.1 To provide the Joint Audit and Scrutiny Panel (JASP) with an update on progress against recommendations arising from audits and inspections which have taken place during Quarter 4, 2021/22.

1.2 To inform the Board of the schedule of planned audits and inspections.

2. Recommendations

2.1 That the Panel notes the status of audits and inspections carried out over the last quarter.

2.2 That the Panel reviews Appendices 1 and 2 and, if required, request further detail which will be reported at the next meeting.

3. Reasons for Recommendations

3.1 To enable the Panel to fulfil its scrutiny obligations with regard to Nottinghamshire Police and its response to audits and inspections.

3.2 To provide the Panel with greater scrutiny opportunities and to reach more informed decisions.

3.3 To provide the Panel with the opportunity to shape the focus and data inputs for future HMICFRS inspections.

4. Summary of Key Points

Audit and Inspection Action Updates

4.1 The actions referred to in this report are the result of recommendations made by Nottinghamshire Police's internal auditors and external inspectorates, including HMICFRS.

4.2 There are currently 0 actions which have exceeded their target date.

4.3 The Workforce Planning Audit was scheduled for 31st January 2022. However it was agreed that because the 2020/21 audit received a satisfactory audit opinion after the 2021/22 audit plan was approved, it would be removed from the 2021/22 plan.

4.3 Recent and forthcoming Inspections are detailed below.

Table 1.1: Recent Inspection Activity

Date of Inspection	Inspection Area	Date Report Received	Final Grading	Status
July 2021 – March 2022	Integrated PEEL			Draft report due spring 2022

Table 1.2: Forthcoming HMICFRS Inspections

Date of Inspection	Inspection Area	Status
w/c 14th February 2022	Serious Youth Violence – Thematic Inspection	Document return completed, timetable agreed.
28th and 1st March 2022	Serious Organised Crime (part of Integrated PEEL Inspection)	Two days of reality testing. Timetable being prepared.
w/c 14th March 2022 (2 weeks)	Counter Corruption and Vetting (part of Integrated PEEL Inspection)	Document return completed, Timetable being prepared.
w/c 28th March 2022	Online Child Sexual Exploitation	Document return and questionnaire completed, Timetable being prepared.

Table 1.3: Publications

Date of Publication	Inspection Area	Status
September 2021	Police Response to Violence Against Women and Girls	Report sent out for management updates.
November 2021	A Joint Thematic Inspection of the CJ Journey for Individuals with Mental Health Needs and Disorders	Report sent out for management update.
July 2021	A Joint Thematic Inspection of Police and Crown Prosecution Service's Response to Rape	Evidence submitted to HMICFRS for review. Awaiting feedback.

Table 1.4: Super complaints

Date of Publication	Title	Status
December 2020	Safe to Share Report on Liberty and Southall Black Sisters' super complaint on policing and immigration status	Force/OPCC response agreed, and updates sent to HMICFRS.
May 2021	Modern Slavery: Hestia super complaint on the police response to victims of modern slavery	Force/OPCC response agreed, and updates sent to NPCC.
August 2021	A Duty to Protect: Police use of protective measures in case involving violence against women and girls	Recommendations sent out for management update.

4.5 Recent and Forthcoming Audits

Table 1.5: Recent Audit Activity

Date of Audit	Auditable Area	Date Report Received	Final Grading	Status
Sept 2021	MFSS Transfer	October 2021	Not applicable – audit purpose to provide assurance to OPCC re progress status of the project.	Final report received. No recommendations.
January 2022	Business Change	Awaited	-	-
January 2022	Health and Safety	Awaited	-	-
January 2022	Information Assurance	Awaited	-	-
January 2022	GDPR	Awaited	-	-

Table 1.6: Forthcoming Audits

Date of Audit	Auditable Area	Status
March 2022	Procurement	N/A
March 2022	Partnerships	N/A
March 2022	Seized Property	N/A

5. Financial Implications and Budget Provision

5.1 If financial implications arise from recommendations raised from audits, inspections and reviews, these implications are considered accordingly. Where an action cannot be delivered within budget provision, approval will be sought through the appropriate means.

6. Human Resources Implications

6.1 There are no direct HR implications as a result of this report. HR implications resulting from specific actions will be managed on a case-by-case basis.

7. Equality Implications

7.1 There are no direct HR implications as a result of this report. HR implications resulting from specific actions will be managed on a case-by-case basis.

8. Risk Management

8.1 Some current actions involve the completion of formal reviews of specific business areas. It is possible that some or all of these reviews will identify and evaluate significant risks, which will then be incorporated into the Force's risk management process.

9. Policy Implications and links to the Police and Crime Plan Priorities

9.1 Any policy implications will be subject to current policy development process.

10. Changes in Legislation or other Legal Considerations

10.1 There are no direct legal implications as a result of this report.

11. Details of outcome of consultation

11.1 Following receipt of a final audit or inspection report a member of the Governance and Planning team consults with the appropriate Lead Officer and other stakeholders to plan appropriate actions in response to each relevant recommendation, or to agree a suitable closing comment where no action is deemed necessary.

11.2 All planned actions are added to the action planning system, 4Action, for management and review until completion.

12. Appendices

12.1 Appendix A - Overview of all ongoing actions and recommendations from Inspections

12.2 Appendix B – Overview of all ongoing recommendations from internal audits.

12.3 Appendix C – Overview of all ongoing recommendations arising from Super Complaints.

HMICFRS INSPECTIONS CURRENT OVERVIEW

Green- Recommendation is agreed closure by HMICFRS

Date	Title	Recommendation	Total Number Outstanding	Total Number Closed
27 Nov 2018	**Policing and mental health: Picking up the pieces** **STATUS – Evidence submitted to HMICFRS for review. HMICFRS have agreed to close the outstanding recommendation.**			
		By December 2019, forces should develop a better understanding of their mental health data, and the nature and scale of their demand. All forces should carry out a 24-hour snapshot exercise, using the new national definition of mental ill-health in Recommendation 1. This would help them see where their mental health demand is concentrated and identify any gaps in their data. The NPCC mental health lead should set out how the data was collected during the Welsh forces snapshot exercise. This exercise will help forces understand the strain on the service by assessing the combination of demand and workload. This will then help forces when establishing and reporting mental health demand in their force management statements (FMSs). The force took part in the NPCC '24-hour snapshot' exercise and have forwarded the substantial information to the NPCC for the national analysis.	**0**	**4**

10 Apr 2019	**Stalking and harassment: An inspection of Sussex Police commissioned by the police and crime commissioner, and an update on national recommendations in HMICFRS 2017 report** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. One recommendation remains open as HMICFRS will reality test when they undertake their Integrated PEEL Inspection in September 2021.**			
		Within six months chief constables should ensure that forces record stalking or harassment crimes if appropriate when victims report breaches of orders. Within six months the National Police Chiefs Council (NPCC) lead and the CPS lead should consider whether they can do more to inform police officers and lawyers of the importance of treating breaches of orders as evidence of a wider pattern of offending, and when and in what circumstances officers and lawyers should treat this as further evidence of stalking or harassment. Within six months chief constables should ensure that officers are aware of the importance of treating breaches of orders, where appropriate, as part of a wider pattern of offending, and ensure that force policy and guidance help officers to do this.	1	0
17 Jul 2019	**The poor relation: The police and Crown Prosecution Service's response to crimes against older people** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. One recommendation remains open.**			
		Within six months, chief constables should make sure that victim needs assessments are always completed.	1	2

27 Sep 2019	**Shining a light on betrayal: Abuse of position for a sexual purpose** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. The force will undergo a Counter Corruption and Vetting Inspection in November 2021. The 2 recommendations listed below will be reality tested to ensure compliance.**			
		By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.	2	1
		By April 2020, all forces that haven't yet done so should: • record corruption using the national corruption categories; • produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable. By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.		

27 Feb 2020	**National Child Protection Inspections 2019 thematic report** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Two recommendations remain open, these recommendations will be reality tested when they undertake their Integrated PEEL Inspection in September 2021.**			
		We recommend that chief constables should review performance management and quality assurance approaches to ensure that assessments of the nature and quality of decision making are routinely made. The purpose of this would be to reinforce the understanding that compliance with policy or process is only one part of effective practice.	2	0
		We recommend that chief constables take steps to reduce the unnecessary criminalisation of children. Such steps could include (but don't need to be limited to) considering fully a child's circumstances when making decisions; more effective use of legislation to discontinue prosecutions not in the public (or child's) interest; the development of more effective non-criminal justice pathways for vulnerable children who commit lower level crimes.		
28 Feb 2020	**A joint thematic inspection of Integrated Offender Management** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. The reason three recommendations remain open is that HMICFRS will reality test these when they undertake their Integrated PEEL Inspection in September 2021.**			
		Ensure that service users are kept informed, as much as possible, about the benefits of inclusion in IOM, the support available and the monitoring and information-sharing ramifications of IOM supervision.	3	1
		Analyse training needs and ensure that all staff receive sufficient training to enable them to fulfil their duties. Training in public protection, safeguarding children and working with vulnerable adults should be prioritised.		

		Improve the quality and accuracy of recording in IOM cases, in particular, the activity relating to public protection.		
9 Mar 2020	**Counter-terrorism policing - An inspection of the police's contribution to the government's Prevent programme** **STATUS – HMICFRS have agreed closure of this recommendation.**			
		With immediate effect, the NPCC national Prevent lead and each force Prevent lead should review the attendance of force representatives at Channel panels so that police are correctly represented by decision makers who can contribution to managing risks.	0	1
9 Jul 2020	**A call for help - Police contact management through call handling and control rooms in 2018/19** **STATUS – HMICFRS have agreed closure of these recommendations.**			
		Each force where there is a vulnerability desk should make sure it makes a positive contribution to initial safeguarding.	0	6
		We expect forces to invest in technology and work with each other to use it to form and improve their risk assessments, their responses, and their investigations to keep the public safe.		
		Each force must be sure it effectively assesses risk at all points of contact with the public and the community. It should use the assessment to provide the best response to vulnerability.		
		Each force should make sure its staff are trained, supervised, and supported to be effective in their control room roles; this should include assessing the effect of better terms and conditions and career development for control room staff.		

		We expect all forces to make sure the service they provide to their communities meets the new national contact management strategy. We will assess how well forces adopt the contact management principles and practise as well as the learning standards during PEEL 2020/21.		
		We expect to see all 43 forces get involved in the single online home and the social media projects.		
21 Jul 2020	**PEEL spotlight report: The Hard Yards Police to police collaboration** **<u>STATUS</u> – Awaiting methodology from National Police Chiefs Council, College of Policing and Home Office - currently delayed due to Covid-19.**			
		If forces haven't yet implemented an effective system to track the benefits of their collaborations, they should use the methodology created by the NPCC, the College of Policing and the Home Office.	1	0
15 Jul 2020	**Roads Policing: Not optional - An inspection of roads policing in England and Wales** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		With immediate effect, in forces where Operation Snap (the provision of digital video footage by the public) has been adopted, chief constables should make sure that it has enough resources and process to support its efficient and effective use.	2	1
		With immediate effect, chief constables should satisfy themselves that the resources allocated to policing the strategic road network within their force areas are sufficient. As part of that process they should make sure that their force has effective partnership arrangements including appropriate intelligence sharing agreements with relevant highways agencies.		

		With immediate effect, chief constables should make sure: • their force has enough analytical capability (including that provided by road safety partnerships) to identify risks and threats on the road network within their force area. • that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and • There is evaluation of road safety initiatives to establish their effectiveness.		
8 Dec 2020	**Pre-charge bail and released under investigation: striking a balance** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		Forces should record whether a suspect is on bail or RUI on the MG3 form when it is submitted to the CPS. This should be regularly checked and any changes in bail or RUI provided to the CPS. The CPS should work with the police to ensure this information is provided.	2	0
		Forces should develop processes and systems to clearly show whether suspects are on bail or RUI. This will help them to better understand the risk a suspect pose to victims and the wider community and will help to increase safeguarding.		
10 Feb 2021	**An inspection of the effectiveness of the Regional Organised Crime Units** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		By February 2022, the chief constable with the lead for SOC in each region, with the chief officers of the affected forces, should ensure that a chief officer is appointed with responsibility for each ROCU, as far as practicable working autonomously of force responsibilities.	2	0

		By February 2022, chief officers responsible for SOC in each region, with the chief officers of the affected forces, should make sure that systems are in place for senior investigating officers (SIOs) and lead responsible officers (LROs) to work effectively together.		
26 Feb 2021	**Disproportionate use of police powers - A spotlight on stop and search and the use of force** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		With immediate effect, forces should ensure that all stop and search records include detail of the self-defined ethnicity of the subject. When this information is refused by the subject, the officer-defined ethnicity code should be recorded.	6	0
		By July 2021, forces should ensure they have effective external scrutiny processes in place in relation to the use of force. Forces should take account of feedback and update the scrutiny panel and the community on the action taken.		
		By July 2021, forces should ensure they have effective internal monitoring processes on the use of force, to help them to identify and understand disproportionate use, explain the reasons, and implement any necessary improvement action.		

		By September 2021, forces should: • ensure that officers record on body-worn video (when this is available) the entirety of all stop and search encounters, including traffic stops and use of force incidents. • have a structured process for regularly reviewing and monitoring internally a sufficient sample of body-worn video footage to identify and disseminate learning and hold officers to account when behaviour falls below acceptable standards; and • provide external scrutiny panel members with access to samples of body- worn video footage showing stop and search encounters and use of force incidents, taking account of the safeguards in the College of Policing's Authorised Professional Practice.		
		By July 2021, forces should ensure that communication skills are reinforced as part of the programme of continuing professional development for officers and staff, and that supervisors are supported to routinely and frequently debrief officers on these skills using body-worn video footage.		
		By July 2022, forces should ensure that officers and staff have effective communication skills, in line with the National Policing Guidelines on Conflict Management. This should be in addition to existing training on conflict Management and de-escalation.		

11 Mar 2021	**Getting the balance right? An inspection of how effectively the police deal with protests** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		By 31 December 2021, chief constables should ensure that their forces have sufficiently robust governance arrangements in place to secure consistent, effective debrief processes for protest policing. Such arrangements should ensure that: • forces give adequate consideration to debriefing all protest-related policing operations; • the extent of any debrief is proportionate to the scale of the operation; a national post-event learning review form is prepared after every debrief; and • the form is signed off by a gold commander prior to submission to the National Police Co-ordination Centre.	2	0
		By 31 December 2021, chief constables should make sure that their legal services teams subscribe to the College of Policing Knowledge Hub's Association of Police Lawyers Group.		
20 Apr 2021	**Policing the pandemic – The police response to the coronavirus pandemic during 2020** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		Overall scale and impact of changes Within 6 months, forces must assess the sustainability of any temporary measures introduced during the pandemic that change the way they work. They must understand positive, negative and unintended consequences of the scale and impact of the changes before determining if any of these new ways of working should continue.	5	0

		Custody records Forces must immediately make sure that they clearly and consistently record on custody records information about how/when/if detainees are informed of the temporary changes to how they can exercise their rights to legal advice and representation. The record must make clear how any consents are obtained about the way in which legal advice and representation are provided.		
		Test, track and trace Forces must immediately put in place a policy to make sure that they follow the guidance and self-isolation directions when members of the workforce come into contact with someone with coronavirus symptoms.		
		Legislation and guidance Forces must immediately make sure they can manage their responses to changes in coronavirus-related legislation. They must ensure frontline officers and staff are clear about the difference between legislation and guidance.		
		Managing registered sex offenders Forces must immediately make sure that officers understand and correctly implement the guidance for managing registered sex offenders during the pandemic.		
20 Apr 2021	**Custody Services in a Covid-19 Environment** **<u>STATUS</u> – Evidence being collected by force.**			
		To help clarify the custody information that forces collect and use, we recommend that forces:	2	0

		• Track the numbers of detainees with, or suspected of having, COVID-19. • Record and monitor the length of time detainees remain in police custody, and any additional detention times due to waits for virtual remand hearings. • Record and monitor the way in which detainees receive their legal rights, and how many receive them by virtual means rather than a solicitor attending in person and • Record the use of bail and released under investigation, and assess any increases in pre-charge bail		
		The police service should evaluate the advantages and disadvantages of using virtual remand hearings. It should use this information to help the wider Criminal Justice System learn from its experience and develop better working arrangements that meet the needs of justice and make best use of public money.		
23 Jun 2021	**Nottinghamshire Police – Review of Policing Domestic Abuse During the Pandemic** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		• We recommend that if forces continue to adopt online contact methods in respect of victims of domestic abuse, they should immediately introduce an effective supervision and monitoring framework. The framework should assess the suitability of such contact methods, ensuring that victim needs are at the forefront of decisions around their use and appropriate onward action is taken in all cases. • We recommend that forces immediately review their use of a telephone-based initial response to any domestic abuse incidents and crimes and ensure that it is in accordance with the strict parameters set out by the College of Policing.	3	0

		We recommend that forces immediately review their capacity to provide ongoing support and safeguarding to victims of domestic abuse whose case is awaiting trial at court. This should: • ensure there are sufficient resources available to maintain contact with victims to keep them up to date with the progress of their case; and • enable the offer of access to specialist support services as well as opportunities to address concerns victims may have regarding continuing to support a prosecution through the delays.		
		We recommend that all forces immediately review their use of outcome 15, outcome 16 and evidence-led prosecutions. This is to ensure that: • domestic abuse investigations guarantee all attempts to engage victims are explored, and that all possible lines of evidence are considered so that in all cases the best possible outcomes for victims are achieved; • there is regular and effective supervision of investigations that supports the above point to be achieved; and • the use of outcomes 15 and 16 is appropriate, and the reasons for using them, including auditable evidence of victim engagement, are clearly recorded.		
16 Jul 2021	**A Joint Thematic Inspection of Police and Crown Prosecution Service's Response to Rape** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		Immediately, police forces should ensure information on the protected characteristics of rape victims is accurately and consistently recorded.	8	0

		Police forces and support services should work together at a local level to better understand each other's roles. A co-ordinated approach will help make sure that all available and bespoke wrap-around support is offered to the victim throughout every stage of the case. The input of victims and their experiences should play a central role in shaping the support offered.		
		Police forces should collect data to record the different stages when, and reasons why, a victim may withdraw support for a case. The Home Office should review the available outcome codes so that the data gathered can help target necessary remedial action and improve victim care.		
		Immediately, police forces and Crown Prosecution Service Areas should work together at a local level to prioritise action to improve the effectiveness of case strategies and action plans, with rigorous target and review dates and a clear escalation and performance management process. The National Police Chiefs Council lead for adult sexual offences and the Crown Prosecution Service lead should provide a national framework to help embed this activity.		
		Police forces and the Crown Prosecution Service should work together at a local level to introduce appropriate ways to build a cohesive and seamless approach. This should improve relationships, communication and understanding of the roles of each organisation. As a minimum, the following should be included: • considering early investigative advice in every case and recording reasons for not seeking it; • the investigator and the reviewing prosecutor including their direct telephone and email contact details in all written communication; • in cases referred to the Crown Prosecution Service, a face-to-face meeting (virtual or in person) between the investigator and prosecutor before deciding to take no further action; and		

		• a clear escalation pathway available to both the police and the Crown Prosecution Service in cases where the parties don't agree with decisions, subject to regular reviews to check effectiveness, and local results.		
		The police and the Crown Prosecution Service, in consultation with commissioned and non-commissioned services and advocates, and victims, should review the current process for communicating to victims the fact that a decision to take no further action has been made. They should implement any changes needed so that these difficult messages are conveyed in a timely way that best suits the victims' needs.		
		Police forces should ensure investigators understand that victims are entitled to have police decisions not to charge reviewed under the Victims' Right to Review scheme and should periodically review levels of take-up.		
		The College of Policing and NPCC lead for adult sexual offences should work together to review the current training on rape, including the Specialist Sexual Assault Investigators Development Programme (SSAIDP), to make sure that there is appropriate training available to build capability and expertise. This should promote continuous professional development and provide investigators with the right skills and knowledge to deal with reports of rape. Forces should then publish annual SSAIDP attendance figures, and information on their numbers of current qualified RASSO investigators.		

5 Aug 2021	**A Review of Fraud – Time to Choose** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the National Police Chiefs' Council Coordinator for Economic Crime about fraud-related calls for service.	2	0
		By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the National Police Chiefs' Council Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud.		
17 Sep 2021	**Police Response to Violence against Women and Girls** **<u>STATUS</u> – Evidence being collected by force.**			
		Immediate review of use of outcomes 15 and 16 in violence against women and girls offences - By December 2022, the NPCC VAWG National Delivery Lead should develop and disseminate to forces a process for consistent and robust monitoring of outcomes 15 and 16 violence against women and girls cases. This should require, as a minimum, inspector-level sign-off of these cases and that evidence on the rationale for these closure codes is recorded and auditable.	3	0
		All chief constables should immediately review and ensure that there are consistently high standards in their forces' responses to violence against women and girls and should be supported in doing so by national standards and data.		

		By March 2022, chief constables should establish and publish an action plan that specifies in detail what steps the force will take to improve and standardise its approach to responding to violence against women and girls offences, with the aim of ensuring policies, processes and practices are effective, actively monitored and managed, and meeting national standards. This should include (but is not limited to) improving and standardising: the use of police powers to protect women, including arrest of perpetrators, use of pre-charge bail, the applications for orders (where appropriate) and processes for responding to breaches of non-molestation and other orders; • the use of the Domestic Violence Disclosure Scheme; the capability of generalist and specialist staff to respond to violence against women and girls offences effectively, including consistent understanding of newer offences (such as coercive control); • the identification and management of high-harm violent offenders against women and girls (in partnership with other organisations); • the identification and protection of the most at-risk victims of violence against women and girls' offences (in partnership with other organisations); and • internal and public communications related to violence against women and girls to ensure that messages raise awareness of the risk and emphasise the seriousness of the issues		
		Structures and funding should be put in place to make sure victims receive tailored and consistent support		

		By March 2022, all police forces should ensure information on the protected characteristics of victims is accurately and consistently recorded		
17 Nov 2021	**A joint thematic inspection of the criminal justice journey for individuals with mental health needs and disorders** **<u>STATUS</u> – Evidence being collected by force.**			
		Assure themselves that risks, and vulnerabilities are properly identified during risk assessment processes, particularly for voluntary attendees. They must ensure that risks are appropriately managed, including referrals to Healthcare Partners, Liaison and Diversion and the use of appropriate adults.	**4**	**0**
		Review the availability, prevalence, and sophistication of mental health flagging, to enhance this where possible, and to consider what meaningful and usable data can be produced from this.		
		Dip sample (outcome code) OC10 and OC12 cases to assess the standard and consistency of decision making and use this to determine any training or briefing requirements and the need for any ongoing oversight.		
		Ensure that all dedicated investigative staff receive training on vulnerability which includes inputs on responding to the needs of vulnerable suspects (as well as victims). This should be incorporated within detective training courses.		

INTERNAL Audits 2020/22

Green- Recommendation is agreed closure by Mazars

Date	Title	Recommendations	Total Number Outstanding	Total Number Closed
March 2020	**Balance Transfers 2020**			
		The Force should ensure that reconciliations are carried out on balances that they transfer to provide assurance that this has been correctly completed. The Force should ensure that a reconciliation is carried out over all balances following the final transfer to provide assurance that the transfer has been correctly completed and agrees to closing balances and signed accounts.	1	0
March 2020	**Health and Safety Follow-up 2020**			
		The Force should ensure that for all incidents where an investigation has been completed, that full and complete records are maintained.	2	4
		The Force should formalise what mandatory H&S training is required by staff, including any additional training for Supervisors, Managers and the Chief Officer team and whether annual refresher training is required. The Force should investigate whether the “Required” mark within NCALT allows for the ability to set deadlines for training courses and automatically send emails to the relevant individual and their line manager if deadlines are missed. The Force needs to designate whose responsibility it is to have overall oversight of training, including monitoring of completion and production of performance information around training. It then needs to be ensured that this individual has the resources in place to effectively monitor this.		

		The Force should update the Health and Safety Policy, ensuring that all information contained within is accurate. The Policy should also be amended to include the additional information not currently included as detailed. The Policy should be reviewed on a regular basis or when there are significant changes to operations or legislation.		
		The Force should produce a formal Accident/Incident reporting procedure. The procedure should provide guidance on what should be reported and how this should be reported by staff. The procedure should be clearly communicated to staff via the intranet.		
		The Force should develop an appropriate Performance Information Framework that provides the Departmental Health & Safety Committees with the relevant detailed information. An overall summary of performance across each Department should be available for the main Health & Safety Committee to have an overall view of key data. Key data that should be available for review should include, but not be limited to: - No. of accidents and incidents; - No. of accident and incident investigations and no. of outstanding investigations; - Timeliness of accidents and incidents reported; - No. of accidents and incidents reported to HSE under RIDDOR; - No. of days lost due to Health & Safety accidents; - Trend analysis of the above over a time period; - Any available benchmarking data (to indicate any under reporting etc.); - Current levels of Health & Safety training.		
		The Force should investigate whether it is possible to automatically notify the Health and Safety advisors when a new accident or near miss is reported using Oracle.		

April 2020	**Programme Management 2020**			
		Force should ensure that all individuals are identified for roles in PMO process on most recent version of Business Case. Force should ensure that documents produced as part of PMO process adhere to the guidance provided.	1	1
		Force should clarify the roles within the two functions to ensure that there is no duplication of roles between Corporate Development and Information Services in relation to Project Management. Force should consider formally providing time in Futures Board agendas to discuss Programme Board activity, to ensure that all Business Change Activity is captured, reviewed and monitored regularly		
Sep 2020	**Victims' Code of Practice September 2020**			
		The Force should produce a condensed guide to the Victims' Code of Practice, following the introduction of the currently proposed changes.	0	15
		The proposed changes to the Victims' Code of Practice should be included within the action plan that is monitored by the Victim and Witness Assurance Group.		
		For the Force to better understand the satisfaction levels of the true population of victims, stratified sampling should be adopted for the surveys undertaken. The results of the surveys can then be analysed to a greater degree by the Force, including: the level of satisfaction dependent on whether a positive / negative outcome was achieved for the victim; and the trends in satisfaction for different crime types.		

		Officers should be reminded when inputting victims records directly onto Niche that they complete all required information including the preferred method.		
		All victims should be offered the Victim Information Pack and / or referred to the information available on the Nottinghamshire Police Victim website. In the instance that the victims have refused, the reason should be recorded on the Niche system. A regime should be established as to how non-completion of the training module will be escalated by the Force. This could entail the Force sending regular updates to line managers details of any Staff or Officers with training that is overdue for completion.		
		A VCOP working sheet should be maintained for each crime involving a victim. Officers should be reminded of the importance of creating and maintaining this working sheet which should be evidenced within the CRMS system.		
		Needs assessments should be carried out with all victims of crime and results recorded on the VCOP working sheet within the CRMS system. This should then be used based on support provision for the victim going forward.		
		Preferred method and frequency of contact should be established with each victim of crime to enable them to be updated on the progress of any ongoing investigation. This should be recorded on the VCOP working sheet and evidence maintained that updates have been provided in line with this request.		

		All victims should be provided with the Victim Information Pack and/ or referred to the information available on the Nottinghamshire Police Victim website. Confirmation that this information has been communicated should be recorded on the VCOP working sheet within the CRMS.		
		The VIP should be reviewed and updated to incorporate the Right to Review procedure and information in respect of participation of the Restorative Justice scheme. (It is noted that a further update to the Victims Code of Practice is due later in 2015 and therefore it is practical to await this publication prior to review and update of the VIP to establish whether any additional areas require review).		
		Officer should be reminded that when updates are provided to victims, acknowledgement should be made within the 'aggrieved updated' box on CRMS to support the update and prevent this being escalated via performance management information.		
		The offer/ availability of a VPS to the victim should be clearly communicated and acknowledged within the VCOP working sheet.		
		All victims should be considered for referral to specialist agencies in addition to Victim Support Services. These referrals and proactive support provided should be evidenced within the CRMS system.		
		The reports detailing officers who are still to complete the Victims Code training should be located and the system for following up non-compliance established to provide assurance that all officers are adequately trained to ensure compliance with the Code.		
		Consideration should be given to documenting guidance for officers in respect of a list of available specialist organisations/ agencies to which victims can be referred to.		

Oct 2020	**Estates Management Oct 2020**			
		The Force should ensure that where SR's are cancelled that these SR's do not feature in the KPI calculation and instead these are reported as a separate figure to identify the number of SR's cancelled each month.	2	1
		The Force should report non-compliance with the SLA in the month in which the SR falls non-compliant, as opposed to amending historical data. This will ensure that the Force maintain the integrity of the reported KPI figure.		
		The Force should consider introducing a suite of KPI's to effectively monitor the performance of the Estates and Facilities department. Furthermore, this will enable the Force to demonstrate value for money from the expenditure incurred in fulfilling the Capital and Planned Maintenance Programme. This suite of KPI's could include but not be limited to: • Monitoring the number of repairs completed right the first time by contractors fulfilling SR's. • Recording and reporting on the results of customer satisfaction surveys for newly built and recently refurbished projects and; Monitoring the number of SR's received for newly built or recently refurbished projects in the first 12 months following completion.		
Dec 2020	**Workforce Planning December 2020**			
		The Force should review and update the People Strategy to include reporting arrangements and decision making processes in place at the Force; a defined individual responsible for the People Strategy; and version control of the document.	1	1

		The Force should complete a mapping exercise and produce a centralised log of all key roles across the organisation, including non-leadership roles which are critical or specialised. Alongside this exercise, individuals who are able to assume these positions in a short / medium / long term capacity should be highlighted.		
Jan 2021	**Information Assurance Follow up January 2021**			
		As intended, the organisation must continue to liaise with NPRIMT in relation to the GIRR accreditation process.	2	0
		Now the force has more resource in place to manage the process the force should look in the longer term to return to an annual cycle of compliance rather than an ongoing pattern of late submissions for the variety of frameworks it is required to comply with.		
Feb 2021	**Core Financial Systems Assurance Feb 2021**			
		OPCC should ensure that the most up-to-date version of the Financial Regulations is published on their website.	7	0
		The Force should request that MFSS update sales invoice credit notes and adjustments process maps to include version control and approval processes.		
		Force should update sales invoice process documentation and guidance notes in respect of changes in working practices.		
		The Force should request that MFSS ensure that all reconciliations are completed and reviewed in a timely manner, i.e. within 1 month of the period end.		

		The Force should liaise with MFSS to ensure that historic balances are investigated and cleared down.		
		The Force should request that MFSS seek authorisation from the Force when looking to perform reconciliations more than one month after the period end and provide notice to the Force when this is unarranged.		
		The Force should liaise with MFSS to ensure that appropriate performance data is provided with regards payroll processing. This could include, but not be limited to, the following: • No. of overpayments & underpayments. • Value of overpayments & underpayments. • Reasons for overpayment i.e. late notification by Force, MFSS missed SLA for Payroll Date etc.		
Feb 2021	**Debt Management Feb 2021**			
		The Force should ensure that Debt Recovery processes are documented in a policy/procedure document. This requires the Force to liaise with MFSS to ensure that processes are aligned.	0	2
		The Force should ensure that MFSS issue invoices with the correct payment terms, therefore ensuring that recovery actions are being carried out at the correct timings.		
Feb 2021	**GDPR Follow Up February 2021**			
		The Force should continue to address the issues identified in the ICO Controllers Checklist, all of which are currently in some level of implementation.	2	0

		We continue to support the approach being taken to complete the Information Asset Register and this should look to be completed as soon as is practical and how the National Enabling Programme progresses.		
Feb 2021	**Risk Management February 2021**			
		The Force should ensure that a thorough review is undertaken of the Force's departmental risk registers, so that risks that are inherent to the respective departments are identified and scored, as stated in the Risk Management Strategy.	6	0
		The Force should ensure that all risk registers are complete and that appropriate controls are recorded for each risk. Where risk controls are being reviewed, the Force should ensure that interim controls are in place to effectively monitor risks.		
		The Force should ensure that further training is provided to users of the JCAD system to ensure that appropriate controls are recorded to mitigate the risks identified.		
		Furthermore, the Force should ensure that where controls and other risk mitigation activities are inserted that these are reviewed to ensure their appropriateness.		
		The Force could consider introducing guidance for users of the JCAD system, which outlines a criterion for controls and risk mitigation activities.		

		The Force should ensure the meeting minutes for the Organisational Risk, Learning, Standards, and Integrity Board are well documented, which demonstrate at the very least: • The registers presented; • The risks discussed; and The decisions reached / action plans devised.		
Feb 2021	**Seized Property February 2021**			
		Policies and Procedures in relation to seized property should be updated to reflect the current adopted process since implementation of Niche in February 2016.	14	0
		Policies and Procedures should be made available for Staff and Officers to view on the intranet.		
		Officers within the Force should be provided with Niche training in relation to the continuity of property management, including the checking in and out of property from temporary storage. Consideration should be made as to how to record the training attendance for all Officers.		
		The Archives and Exhibits team at stores should reject acceptance of any items which do not have a property reference attached.		
		A log should be maintained of instances where property has not been correctly labelled. Through use of this log, individuals responsible for the failures should be held accountable.		
		The Force should regularly perform reconciliations of locations for property that is held against records maintained on the Niche system.		

		Where it is identified that property is not in the location stated on Niche, Niche should be updated to reflect that it is in the Officers' possession.		
		The Force should review and streamline the C17 form. Where a C17 form has not been completed correctly, this should be recorded and referred to the Officer responsible.		
		Access to the Temporary Stores should be restricted to only police officers or the Archive & Exhibit Team who require access. Those who do not have a job-related purpose should have their access to these areas removed.		
		In the interim period, the Force should consider if audit trail access for individuals entering the stores is available. This data could be analysed to show an inappropriate access.		
		The Force should ensure that regular reconciliations of the safe are performed, to highlight any errors/missing items.		
		For items of a high value of risk, appropriate action should be taken to escalate the issue and ensure items are located in a timely manner.		
		In the instance where property cannot be located appropriate actions should be taken to identify its whereabouts		
		Meetings for the RRD working group should be documented and consideration should be made for performance indicators to be introduced		

April 2021	**Wellbeing April 2021**			
		The Force should ensure that policies, procedures, and guidance notes are reviewed regularly; and, that this is noted in the document control sections even if no updates are made.	0	4
		The Force should ensure that the review of policies, procedures and guidance notes is monitored regularly, either by the Strategic Wellbeing Board or within the HR function.		
		The Force should ensure that data is included in the decision-making process for wellbeing, which will ensure that the need for initiatives can be clearly evidenced. Force should also look at performing data analysis to identify areas of need at a detailed level and assist in providing resources for wellbeing to the areas that could be most impacted or are in the most need.		
		Management information should be produced to demonstrate the impact and delivery of third-party services and internal projects and/or programmes, with this being presented to the relevant governance boards.		
April 2021	**Complaints Management April 2021**			
		The fix for the system issue should be sought, so that closed complaints can be accurately updated on the Centurion system.	0	6
		OPCC staff should ensure that records are closed on Centurion in a timely manner.		
		The sample testing performed should include review of whether a term of reference was issued to the complainant.		

		The OPCC should ensure that all communication made with complainants are logged and recorded on the Centurion system.		
		The PSD team should communicate to complaint handlers the importance of maintaining complete records for complaints on the Centurion system. This can be approached by both circulating bulletins and informing the team of issues through presentations.		
		The PSD team should perform regular reviews over cases managed outside of schedule 3 to ensure that they are correctly administered.		
September 2021	**Firearms Licensing September 2021**			
		The Firearms Licensing Process Maps should be updated to include: • It should be clearly noted on the enquiry form whether a home visit, police station interview or digital interview has taken place. • Where a home visit does not take place, it should be ensured that supporting evidence received, such as photographs, are noted as having been received on the enquiry form prior to authorisation. • Where an applicant may be considered as higher risk, the Force should consider delaying the application until a date where home visits can be undertaken.	0	5
		To ensure each firearms license application has the required documentation that has been signed and dated, a quality review should be undertaken on a sample of records on a periodic basis in order to determine the completeness of applicant records. Finding of the quality reviews should be analysed and fed back to relevant staff to ensure lessons are learned from any common or frequent errors.		
		The Force should remind officers that all enquiry forms are to be signed and dated by an authorised signatory. In addition, this should be checked in the data quality review.		

		All current procedural guidance documents should be reviewed on an annual basis, and then updated if necessary. A document attributes section should be added to all process documents, detailing the staff member responsible for the content of the document, the date of the last review and the review cycle period.		
		Additional key indicators should be implemented. KPIs could include: • Average turnaround times • FEO visits per month • Percentage of renewals completed prior to expiry Targets should be set for KPIs and performance indicator progress against targets should be reported on a monthly or quarterly basis.		

SUPER COMPLAINTS CURRENT OVERVIEW

17 Dec 2020	**Safe to share - Report on Liberty and Southall Black Sisters super-complaint on policing and immigration status** **<u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.**			
		Recommendation 1. To chief constables: As an interim measure, pending the outcome of recommendation 2, where officers only have concerns or doubts about a victim's immigration status, we recommend that they immediately stop sharing information on domestic abuse victims with Immigration Enforcement. Instead, police officers should link the victim to a third party that can provide advice and assistance, as set out in recommendation 4 (on the creation of safe reporting pathways). This applies where police officers have doubts about a victim's immigration status, not where they have evidence that an offence has been committed. The College of Policing will immediately develop guidance for the police service to clarify this aspect of practice. Notes to recommendation 1 This recommendation to stop information sharing only applies to victims of domestic abuse. The College of Policing guidance will also clarify the difference between insecure and uncertain status and immigration offending. Any sharing of information should be done in compliance with Information Commissioners Office (ICO) guidance. Third party could include a local or national specialist victim support organisation or another individual/organisation that can act as an intermediary and advocate on the victim's behalf in communications with Immigration Enforcement as required.	4	0
		To chief constables: With reference to recommendation 1, and in consultation/collaboration with local or national specialist organisations, chief constables should		

		take steps to ensure that all migrant victims and witnesses of crime are effectively supported through safe reporting pathways to the police and other statutory agencies. They should: • ensure there is a proper policy and practice framework in place for officers to work within; • develop victim and witness support policies that reflect the characteristics of the safeguarding protocol set out in recommendation 3, and: draw on all relevant national guidance with particular reference to the Code of Practice for Victims of Crime and data protection legislation; are developed in partnership with and include pathways to the relevant specialist organisations for supporting victims and witnesses with insecure immigration status; are clear about the circumstances in which information will be shared by police with immigration enforcement; provide clarity about the purpose of sharing information at different points of the pathway; and explicitly recognise the importance of telling victims, witnesses and supporting agencies whether information will be shared with Immigration Enforcement, and if so, when and in what circumstances. • promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse; • promote awareness within their forces of any existing pathways to specialist organisations for supporting victims with insecure immigration status; • ensure the policy and practice framework is adopted by all officers and staff who come into contact with victims of crime who have insecure immigration status; and • promote police engagement in regular outreach community work, as highlighted as good practice in this report.		
		To chief constables and police and crime commissioners (or equivalents): With reference to recommendation 1, pending the developments		

		outlined in other recommendations and in consultation/collaboration with local or national specialist organisations, chief constables and police and crime commissioners should take steps, through the appropriate channels, to promote migrant victims and witnesses confidence in reporting crimes to the police through safe reporting pathways, without fear of prioritised immigration control.		
		To all recipients of recommendations from this investigation: Provide an update to Her Majesty's Chief Inspector of Constabulary on progress in implementing these recommendations within six months of the date of publication of this report.		
26 May 2021	**Report on Hestia's super-complaint on the police response to victims of modern slavery** **<u>STATUS</u> – Evidence submitted to NPCC. Awaiting sign off.**			
		To chief constables, and police and crime commissioners Work together to understand the support needs of victims of modern slavery crimes. They should provide appropriate support within their respective remits to augment the national provision so that victims feel safe and empowered to remain involved in any investigations. This should focus on what support should be available before and after National Referral Mechanism (NRM) referral as well as alternative provision available for those declining NRM referral.	2	0
		To chief constables Assure themselves that their resources are being deployed to enable effective investigation of modern slavery offences (which may, for example, involve taking account of high levels of vulnerability and organised crime group involvement). They should assure themselves that their crime allocation processes direct investigations to the most appropriately skilled individuals and teams.		

24 Aug 21	**A duty to protect: Police use of protective measures in cases involving violence against women and girls - <u>STATUS</u> – We are collecting evidence from Head of Department**			
		Monitoring of recommendations a. Home Office and Ministry of Justice to each provide a report to Her Majesty's Chief Inspector of Constabulary on progress in implementing HMICFRS's recommendations within six months of the date of publication of this report. b. NPCC to collate chief constables' progress in reviewing and, where applicable, implementing their recommendations and report these to Her Majesty's Chief Inspector of Constabulary within six months of the date of publication of this report.	8	0
		Chief constables should consider what legal support they need to use protective measures (if they don't already have this) and secure this support. The NPCC should consider whether regional or national legal (or other) expertise could be made available, so forces can easily access specialist support and can maximise efficiency and consistency.		
		Chief constables should assure themselves that: a. their officers are fully supported in carrying out their duties to protect all vulnerable domestic abuse victims by: i. ensuring their officers understand the suite of protective measures available (including new measures such as DAPOs); ii. ensuring officers are aware of referral pathways to third-party support organisations which are available to protect vulnerable domestic abuse victims; and iii. ensuring their officers have guidance and support on how to choose the most appropriate response for the situation; and b. governance is in place to monitor the use of all protection orders and to evaluate their effectiveness, including by seeking the views of victims.		
		Chief constables should, until DAPOs replace DVPNs and DVPOs in their force: a. review, and if necessary refresh their policy on DVPNs and DVPOs, and in line with the overarching recommendation: i.		

		ensure that there is clear governance and communication to prioritise the effective use of DVPNs and DVPOs, when these are the most appropriate tools to use; ii. monitor their use to ensure they are being used effectively; and b. ensure experience and lessons learned on using DVPN/DVPOs informs the use of DAPOs		
		Chief constables should review and if necessary refresh their policy on how the force processes notifications of NMOs, so officers can easily identify if an NMO exists.		
		Chief constables should introduce processes to ensure that in all pre-charge bail cases where bail lapses, the investigator in charge of the case carries out an assessment of the need for pre bail-charge to continue. In those cases where the suspect has not been charged, the decision to extend or terminate bail should be recorded with a rationale.		
		Chief constables should ensure data is gathered on the use of voluntary attendance to enable the identification of patterns of its use, particularly in relation to the types of cases, so that voluntary attendance is only used in those cases where it would be an appropriate case management tactic.		
		Chief constables, in conjunction with the NPCC lead for bail, should implement processes for managing RUI in line with the letter from the NPCC Lead for Bail Management Portfolio dated 29 January 2019 (Annex F). This is to ensure, as far as is possible, that investigations are conducted efficiently and effectively, thereby supporting both victims of crime and unconvicted suspects.		