For Information	
Public	
Report to:	Joint Audit and Scrutiny Panel
Date of Meeting:	29 th July 2021
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Agenda Item:	05

^{*}If Non Public, please state under which category number from the guidance in the space provided.

Victim Code Audit Update

1. Purpose of the Report

1.1 The purpose of this report is to update the Police and Crime Commissioner and the Joint Audit and Scrutiny Panel (JASP) in relation to results and response to the scheduled audit related to Victim Code Compliance undertaken in September 2020 by Mazars LLP.

2. Recommendations

2.1 It is recommended that the contents of this report are noted.

3. Reasons for Recommendations

3.1 The above recommendation is made to ensure that the Nottinghamshire Police and Crime Commissioner (PCC) and the Joint Audit and Scrutiny Panel are appraised of the audit outcome and remedial activity undertaken in relation to victim code compliance.

4. Summary of Key Points (this should include background information and options appraisal if applicable)

- 4.1 In December 2015, Mazars undertook an internal audit into force compliance with the victim code and reported limited assurance, issuing 10 recommendations. These comprised, two fundamental, six significant and two housekeeping matters.
- 4.2 As a result of the improvement activity undertaken, upon review through the 2020 audit, Mazars reported satisfactory assurance of the force performance; with seven of the 2015 recommendations being discharged and three being carried forward.
- 4.3 The 2020 audit identified six recommendations (including the three carried forward from 2015) comprising 3 significant and three housekeeping matters. These recommendations are detailed below and have all been remitted to the

Victim and Witness Assurance Group for implementation and are at various stages of progress as described.

- 4.4 The Victim and Witness Assurance Group, formed in April 2020, is a quarterly meeting chaired by DCS Gary Hooks with representatives from across the organisation and the OPCC. The group seeks to ensure that our service to victims and witnesses is continually improving and has been instrumental in delivering the requirements of the revised victim code.
- 4.5 The Victim Code requires that victims are invited to designate a preferred method and frequency of contact for updates. In 2015 this was found to be inconsistent with 40% failing to reflect any victim preference; in 2020 this had improved to 10%.

A housekeeping recommendation was raised for staff to be reminded of the requirement to invite victims to designate a preferred means and frequency of contact. Compliance with this requirement has now been introduced into the internal crime audit activity and will be reported on a quarterly basis as part of the Victim and Witness Assurance Group performance pack.

4.6 In 2015 a recommendation was made to monitor and improve the uptake of training to staff in relation to the Victim Code requirements, at that time there was no record of completion and therefore no assurance of the workforce understanding. The force now has mechanisms to monitor completion of mandatory training as referenced in the 2020 audit in which the completion rates were recorded as 82%.

As a result of the introduction of the new Victims Code a revised NCALT package has been released. Monitoring of completion rates will be reported quarterly as part of the Victim and Witness Assurance Group performance pack.

4.7 The victim code stipulates an entitlement for victims to receive a clear explanation of what to expect from the criminal justice process and signposting to relevant support services. In 2015 it was found that the provision of this information, in the form of a victim information pack, was not recorded in more than half of cases (44% compliance).

This had improved to 70% compliance in 2020 and it is anticipated that these cases, where this isn't recorded, are likely to be victims that have declined the provision of the victim information pack. Therefore, when enquiring with a victim, positive responses can be captured but refusals are not as there is no field to express the reason for refusal.

Work is underway to make changes to the system to allow opportunity to record those victims declining the Victim Information Pack so as to understand why victims are declining the offer and to also be more reassured about our compliance. 4.8 The 2020 audit recognised the ongoing activity by Corporate Communications in relation to surveying victims of crime but suggested that this endeavour be extended. However, it has been fed back that Mazars analysis failed to recognise several activities undertaken to secure feedback from victims.

Specifically, it only referenced two areas of survey (Domestic and Sexual abuse), omitting our activity on hate crime and Domestic Violence Disclosure Scheme (DVDS/Clare's Law) and the fact that our Research and Insight Team during 2019/2020 undertook in excess of 1200 surveys.

Notwithstanding the breadth of work undertaken, in response to the recommendation from the audit, we have engaged regionally with other forces to establish what further survey activity could be undertaken to enhance our response to victim satisfaction; and have found our approach to be at least equitable to the approach taken across the region, if not superior.

Further work is underway regarding the use of satisfaction data and how, through focus on particular crime categories or victimology, the force might better guide some further improvements in our approach.

- 4.9 There were two further housekeeping recommendations in the 2020 audit. The first related to undertaking an assessment of the changes to the 2021 victim code refresh and the second related to ensuring staff were appraised of the changes. Both have been discharged, the revised Victims Code is now embedded in practice and a comprehensive communications plan and mandatory training have been imposed.
- 4.9 Nottinghamshire Police are fully engaged with National and Regional colleagues and are working with the Ministry of Justice (MoJ) in order to meet data recording and reporting requirements following the introduction of the new Victims Code.

The force now has specified performance measures aligned to the requirements of the victim's code and Ministry of Justice (MoJ) requirements against which we perform well.

5 Financial Implications and Budget Provision

5.1 No financial or budgetary implications are anticipated.

6 Human Resources Implications

6.1 No Human Resources Implications identified.

7 Equality Implications

7.1 There are no equality implications identified as part of this report.

8 Risk Management

8.1 Work outlined in the report seeks to promote compliance with the Victim Code.

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

9.1 Compliance with the Victims Code links to the Police and Crime Plan themes of protecting and supporting victims and improving the trust and confidence in policing.

10 Changes in Legislation or other Legal Considerations

10.1 Amendments to the Victim Code were made in April 2021 and have been incorporated into the improvement activity and assured in existing practices.

11 Details of outcome of consultation

11.1 Not applicable as this report is for information only.

12. Appendices

12.1 Mazars Audit Report on Victim Code September 2021 Final Draft.

13. Background Papers (relevant for Police and Crime Panel Only)

13. None

NB

See guidance on public access to meetings and information about meetings for guidance on non-public information and confidential information.



OPCC for Nottinghamshire and Nottinghamshire Police

Final Internal Audit Report

Victims' Code of Practice

October 2020

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If you should wish to discuss any aspect of this report, please contact Mark Lunn, Internal Audit Manager, mark.lunn@mazars.co.uk or David Hoose, Partner, david.hoose@mazars.co.uk

Status of our reports

This report ("Report") was prepared by Mazars LLP at the request of the Office of the Police & Crime Commissioner for Nottinghamshire and Nottinghamshire Police and terms for the preparation and scope of the Report have been agreed with them. The matters raised in this Report are only those which came to our attention during our internal audit work. Whilst every care has been taken to ensure that the information provided in this Report is as accurate as possible, Internal Audit have only been able to base findings on the information and documentation provided and consequently no complete guarantee can be given that this Report is necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

The Report was prepared solely for the use and benefit of the Office of the Police & Crime Commissioner for Nottinghamshire and Nottinghamshire Police and to the fullest extent permitted by law Mazars LLP accepts no responsibility and disclaims all liability to any third party who purports to use or rely for any reason whatsoever on the Report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification. Accordingly, any reliance placed on the Report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification by any third party is entirely at their own risk

Please refer to the Statement of Responsibility in Appendix A2 of this report for further information about responsibilities, limitations and confidentiality.

01 Introduction

As part of the Internal Audit Plan for 2020/21 for the Office of the Police and Crime Commissioner for Nottinghamshire (OPCC) and Nottinghamshire Police, we have undertaken an audit of the controls and processes in place in respect of the Victims Code of Practice.

The specific areas that formed part of this review included: compliance to the code, preparedness for change, and lessons learned.

The fieldwork for this audit was completed whilst government measures were in place in response to the coronavirus pandemic (Covid-19). The fieldwork for this audit has been completed and the agreed scope fully covered. Whilst we had to complete this audit almost entirely remotely, we have been able to obtain all relevant documentation and/or review evidence via screen sharing functionality to enable us to complete the work.

We engaged with a number of staff members across the Force and OPCC during the review and are grateful for their assistance during the course of the audit.

02 Background

The Code of Practice for Victims of Crime forms a key part of the wider Government strategy to transform the criminal justice system by putting victims first, making the system more responsive and easier to navigate. Victims of crime should be treated in a respectful, sensitive and professional manner without discrimination of any kind. They should receive appropriate support to help them, as far as possible, to cope and recover and be protected from re-victimisation. It is important that victims of crime know what information and support is available to them from reporting a crime onwards and who to request help from if they are not receiving.

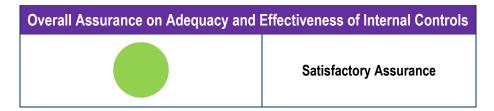
The Force utilises the Niche system for recording the actions required under the Victims Code of Practice (VCOP) and uses this for monitoring the levels of compliance at the Force.

Audit last completed a review of VCOP at Nottinghamshire in December 2015, where a limited level of assurance was provided. Ten recommendations were raised in total, of which two were fundamental, six were significant and the remaining two with a housekeeping priority. All recommendations that were raised in the last audit have been reviewed, with full details of the findings noted in both the **risk management** section and section **5** of the report.

Since the last audit, the Force have introduced a system, Niche, to record and maintain records for victims. The system, alongside the functionality embedded within it to achieve compliance to the VCOP, has been considered and tested as part of this review.



03 Key Findings



Priority	Number of recommendations
1 (Fundamental)	0
2 (Significant)	3
3 (Housekeeping)	3
TOTAL	6

Examples of areas where controls are operating reliably

- The Force utilise a web form interface for Niche, which is a user-friendly method for creating a case for victims of crime.
- Audit performed a walkthrough of the Niche web form, confirming that it is suitably aligned to the requirements of the VCOP. It was also confirmed that the use of mandatory fields during input ensures that key data is captured.
- There is appropriate monitoring of performance / reporting against compliance to the VCOP to the Office of the Police and Crime Commissioner (OPCC) through Performance and Insight reports, in addition to the Force Performance Board.
- Daily Performance Reviews and Team Packs are in place to highlight noncompliance with the code to line managers of each Force unit.
- Forums are in place to review performance of the Force against the VCOP, including the Victim and Witness Assurance Group; the National Police Chiefs' Council (NPCC) Victim and Witness Group; and the East Midlands Criminal Justice Service (EMCJS) Victim and Witness Delivery Group.
- Audits are performed by the Corporate Development Team, reviewing 350 cases for the period April 2019 to April 2020. The audits focus on 13 key areas, with a compliance rate reported on each. Recommendations are also suggested from these findings to seek to improve performance for the Force.
- The intranet page for the Victims Code also contains other guidance for officers, covering areas such as giving evidence in court, in addition to how to correctly use the Niche system.

Risk Management

While there is a basically sound system of internal control, there are weaknesses which put some of the Organisation's objectives at risk. There is evidence that the level of non-compliance with some of the control processes may put some of the Organisation's objectives at risk.

As part of this review, a follow up of the recommendations raised in the December 2015 audit has been completed. The audit has found that improvements have been identified, as evidenced by closure of seven of the ten previously raised



recommendations. However, a number of recommendations have been deemed to be not implemented and therefore a new recommendation has been raised. This supports the audit opinion of a satisfactory assurance over the adequacy an effectiveness of controls in place for compliance with the VCOP.

For the three recommendations which audit were unable to confirm as implemented, they relate to the following:

- A recommendation was raised for the preferred method and frequency of contact to be established with each victim of crime. A sample test of 10 victim cases on the Niche system were reviewed, where it was confirmed that in one instance, the preferred method of contact was not established with the victim.
- It was recommended that all victims should be provided with the Victim Information Pack and / or referred to the information available on the Nottinghamshire Police Victim website. A sample test of 10 victim cases on the Niche system was completed, where in three instances, it could not be confirmed if the victim was provided with or offered the Victim Information Pack.
- A recommendation was raised for reports to be produced that details officers who are still to complete the Victims Code training, in addition to following up non-compliance. Audit were provided with the Victims Code E-learning completion rate at the time of the audit, with the compliance rate for Officers, PCSOs and Staff at 88%, 95% and 63% respectively. However, at the time of the audit a system for following up non-compliance had not yet been established.

The Force utilise guidance from the Ministry of Justice (MoJ), to support officers in complying with the Victims Code. This information is uploaded onto the intranet, enabling all officers to access this guidance. Audit observed that this guidance is directly that of the MoJ, with no specific documentation produced by the Force. Through discussions with management, it is understood that this was previously considered by the Force, but the decision was made to not proceed with this. Whilst audit acknowledge this, with the proposed changes that are due to be made to the VCOP, creating a condensed guidance document will serve well in ensuring that users are clearly aware of changes.

For the changes proposed to be made to the VCOP, Audit sought to confirm evidence of there being suitable governance over these. Whilst audit have been advised conversations have taken place in respect of the changes, this is not

currently on the action plan for the Victim and Witness Assurance Group. Therefore, a recommendation is being raised in this respect.

Through discussions with management it has been noted that the Corporate Communications team undertake surveys on victims. The purpose of the surveys are to understand the level of satisfaction of victims from the service that they have been offered. Results from the surveys undertaken are presented within the Performance and Insight reports that are published on the OPCC website. Audit reviewed the most recent report, for performance to March 2020, where it was noted that surveys are conducted on cases categorised as sexual offences or domestic abuse. The domestic abuse category does include crimes of a varying nature which have an element of domestic abuse to them. However, audit have been advised that there are approximately 800 crime types that are loaded onto the niche system. 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 level of assurance provided also considers the follow up work that has been undertaken as part of **section 5** of this report.

Value for Money

Value for Money (VfM) considerations can arise in various ways and our audit process aims to include an overview of the efficiency of systems and processes in place within the auditable area.

Through the use of the Niche web form, the Force have a format of highlighting the key aspects of cases that require completion by officers and collating these into one location. This creates efficiency for Officers when inputting this data.

Furthermore, it has been noted that the Force are introducing a mobile app version of the Niche interface. This will allow for Officers to input and create cases with greater flexibility, further improving the efficiency of Officers.

Sector Comparison

From our experience across our client base, we are seeing pressure on resources and higher service demands have resulted in challenges to the existing control environment. This often results in increased challenges to the decision making process where conflicting priorities exist and need to be balanced with effective risk management.

Areas of good practice were identified, including the compliance audits and the action plan in place for the Victim and Witness Assurance Group in place to monitor the levels of compliance and set actions to improve compliance.

Recommendations are made to further drive improvements in the process and to address the identified risks.



04 Areas for Further Improvement and Action Plan

Definitions for the levels of assurance and recommendations used within our reports are included in Appendix A1.

We identified a number of areas where there is scope for improvement in the control environment. The matters arising have been discussed with management, to whom we have made recommendations. The recommendations are detailed in the management action plan below.

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
4.1	Observation: The key document in place to provide guidance to Officers in relation to the Victims' Code of Practice is the Ministry of Justice issued guidance. This guidance is nonspecific to the Force and is 104 pages in length. As Audit have observed, there is no condensed guidance document, produced by the Force to support officers. Through having a condensed guidance document available to Officers, it will support them in ensuring that the VCOP is adhered to, in addition to not having to refer to the lengthy guidance. Through discussions with management, it is understood that this was previously considered by the Force, but the decision was made to not proceed with this. Whilst audit acknowledge this, with the proposed changes that are due to be made to the VCOP, creating a condensed guidance document will serve well in ensuring that users are clearly aware of changes. Risk: Officers are unaware of the requirements of the VCOP and therefore the Force is non-compliant with the code thus failing the victims' of crime.	The Force should produce a condensed guide to the Victims' Code of Practice, following the introduction of the currently proposed changes.	3	All Victims Code guidance, reference documents and user guides are on the VCOP Intranet site to support staff in understanding the Victims Code requirements and how to complete/update Niche records. A review of the intranet site will be undertaken consulting front line staff to its suitability and ease of use to define how it can be improved to make better use of the resources and prioritise/condense key guides. Action. This will be co ordinated by C/Insp Woolley and monitored via the Victims and Witness Assurance Group Meeting.	C/Insp Woolley Timescale: Review in 6 months. (April 2021) This will be dependent on the new Victims Code being published and subsequent required alterations.



	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
4.2	Action Plan Observation: The Victim and Witness Assurance Group are a tactical level group who review the performance figures for VCOP compliance in depth. An action plan is also in place to track and monitor tasks for the Victim and Witness Assurance Group. The Group is chaired by the Head of Crime and Operations and meet every two months. Audit reviewed the action plan and it was noted that the proposed changes to be made to the Victims' Code of Practice, were not included. Given any changes to the code will impact upon the way Force deals with victims of crime this should be added to ensure appropriate preparations are being made. Risk: The changes to the VCOP are insufficiently monitored and tracked. The Force is not prepared for the changes to the VCOP.	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.	3	The proposed changes to Victims Code of Practice have been raised at the Victim and Witness Assurance Group. Will ensure V&W Assurance Group Minutes are documented to ensure this is recorded in future meetings. Action. C/Insp Woolley will ensure as from November 2020 V&W Meeting this will be documented and monitored	C/Insp Woolley Timescale: Completed November 2020

Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
Satisfaction Surveys Observation: It has been noted that surveys are performed by the Corporate Communications team to assess the level of service received by victims from the Force. The current approach to surveys is that cases that are categorised as either sexual offences or domestic abuse will be selected and questions will be asked to understand their level of satisfaction. It has been noted that the domestic abuse category can include crimes of a varying nature, which have an element of domestic abuse to them. However, there are multiple other crime types (audit have been advised that there are approximately 800 crime types) and victims of these crimes are not being surveyed. Therefore, the satisfaction surveys are not completed to reflect the true satisfaction of all victims. Risk: The Force are unaware of victim's views on the level of service received therefore are unable to identify any areas of concern.	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.	2	The Force currently surveys Domestic Abuse, Sexual Offences and Hate Crime offences by Research and Insight Team. It is noted Nottinghamshire Police do not currently survey a wider category of crime types. Action. C/Insp Woolley. This will be reviewed and consultation with other Forces within the Region will commence to understand how this undertake in other areas and to establish best practices. This will be ongoing and monitored/reviewed via the V&W Assurance group.	C/Insp Woolley Timescale: Review in 6 months (April 2021)



	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
4.4	Preferred Method of Contact Observation: Upon initial contact with victims, officers should establish their preferred method and frequency of contact, which should be recorded on the niche system. Audit performed a sample test of 10 victim cases on the Niche system, where it was confirmed that in one instance, the preferred method of contact was not established with the victim. Officers can submit the victim record on Niche, via a web form or directly into Niche. Audit observed that the web form fields are mandatory so therefore when inputting using this method this information should always be recorded. Therefore, this indicates that when victim records are created directly into Niche this is when the missing data could occur. This test was performed as part of the follow up section of the last audit, further detailed in section 5 of the report. Risk: Failure to establish a victim's preferred method of contact resulting in updates being made in a format which is not accessible / understandable by the victim and noncompliance with the Victims Code of Practice.	Officers should be reminded when inputting victims records directly onto Niche that they complete all required information including the preferred method.	3	The Webform has mandated requirements, including the preferred method of contact. This has now been replicated in Niche as of October 2020. Action. Niche forms have been reviewed and as part of the annual niche upgrade the following are now mandated fields for officers: Preferred method of contact Victim Services Booklet Supplied Required Update frequency Priority Category Officer Details	C/Insp Woolley Timescale: Completed. October 2020



	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
4.5	Victim Information Observation: Victims are entitled to receive a clear explanation of what to expect from the criminal justice process. On the niche system, Officers are able to confirm that they have either provided the Victim with a Victim Information Pack (VIP) or referred them to the Nottinghamshire Police Victim website. Audit performed a sample test of 10 victim cases on the Niche system, where it was identified that in three instances it was not recorded why the victim was not provided with a victim information pack. This test was performed as part of the follow up section of the last audit, further detailed in section 5 of the report. Risk: Failure to 'signpost' victims to appropriate victim support material resulting in lack of information for them in respect of the different provisions available. This could result in increased vulnerability of victims and non-compliance with the Victims Code of Practice.	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.	2	Niche currently does record the reason for refusal of acceptance of the Victim Information Pack (VIP)or Signposting to the website. Action. C/Insp Woolley to review niche as it permits negative responses to the VIP not being offered at all. This is to be explored and appropriateness of positive response and documenting reasons why/when the VIP cannot be offered. This will require regional consultation due to amending Niche.	C/Insp Woolley Timescale: Review in 3 months (January 2021)



	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
4.6	Observation: A Victims Code E-learning module is available for Staff, Officers and PCSOs at Nottinghamshire to complete. At the last audit, the Force did not have a method in place to establish the completion levels of this training, or a process to follow up non-compliance. Audit were provided with the Victims Code E-learning completion rate at the time of the audit, with the compliance rate for Officers, PCSOs and Staff at 88%, 95% and 63% respectively. This confirms that the Force have established how to assess the level of compliance. However, a system to follow up non-compliance could not be suitably evidenced to audit. This test was performed as part of the follow up section of the last audit, further detailed in section 5 of the report. Risk: Failure to monitor those officers who have not completed the mandatory e-learning for Victims Code resulting in a lack of assurance that officers have been adequately trained to ensure compliance with the Code.	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.	2	Action. C/Insp Woolley to ensure all outstanding officers/Staff have been emailed to complete. This has commenced (Sept 20) is now subject to quarterly review of completion rates and officers being contacted to complete.	C/Insp Woolley Timescale: Completed October 2020



05 Follow up of Action Plan

Definitions for the levels of assurance and recommendations used within our reports are included in Appendix A1. We identified ten areas for improvement in the control environment during the last audit, which we have followed up as part of this review, with our findings noted as per below.

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
4.1	VCOP Working Sheet Observation: A VCOP working sheet should be created for all cases where there is a victim and retained on the Crime Recording System (CRMS). Audit testing identified that the working sheet had not been created in two out of twenty-five cases. Therefore, compliance with the Victims Code of Practice could not be evidenced in these cases. Risk: Failure to evidence that the victim has received all required information and related support, including the mandatory needs assessment, leading to no compliance with the Victims Code of Practice.	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.	2	Accepted in part Introduction of Niche in February 2016 will supersede the use of CRMS and thus the need for working sheets. A communication strategy is in the process of being written to reiterate current requirements and outline the significant changes which will take effect from February 2016 The Force also produces a DPR report which contains details of those crimes where there has been no victim update for 22 days. These report figures are part of daily business in both pre-daily management meetings		Implemented Audit have confirmed that as Niche is now used to retain records in relation to the VCOP, the use of working sheets are now redundant. Through the fieldwork completed, it has been confirmed that the requirements that were previously mandatory as part of the working sheets are now adhered to through the use of the (Occurrence Evidential Log) OEL functionality. Audit performed a sample test of 10 victim cases, where it was confirmed in all instances OELs were in



Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
			(DMM) on localities and also in divisional daily management meetings (DMM). Furthermore they are presented as part of the divisional OPR performance packs for monitoring and corrective action	31/1/2016 T/Chief Inspector Andy Goodall	place and being used by officers.
			Action:- Communication strategy to be written and cascaded to relevant staff. Significant changes to be outlined and communicated via Weekly Order		
			T/Chief Inspector Andy Goodall to ensure victim figures are available and presented as part of the divisional OPR performance packs for monitoring and corrective action		



4.2 Needs Assessment

Observation: All officers should carry out a dedicated needs assessment with each victim to establish the level of support they require. This is evidenced on the VCOP working sheet.

In addition to the two cases identified in finding 4.1, one additional case was identified where the needs assessment part of the VCOP working sheet had not been completed by the responsible office.

Risk: Lack of identification of the support needs of the victim and subsequent failure to provide the required level of support resulting in increased vulnerability of victims and non compliance with the Victims Code of Practice.

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 of the basis of support provision for the victim going forward.

Accepted in part

The Force also produces a DPR report which contains details of those crimes where there has been no victim update for 22 days. These report figures are part of daily business in both predaily management meetings (DMM) on localities and also in divisional daily management meetings (DMM). Furthermore they are presented as part of the divisional OPR performance packs for

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Introduction of Niche in February 2016 will supersede the use of CRMS and thus the need for working sheets. A communication strategy is in the process of being written to reiterate current requirements and outline the significant changes which will take effect from February 2016

31/1/2016

T/Chief Inspector Andy Goodall Implemented

Audit have noted that the completion of needs assessments is now automated through use of the Niche web form. Through completion of certain fields relating to the victim, there is autopopulation of a field that defines whether a victim is to be considered as a priority or non-priority. Audit have been advised that the determination for whether a victim is considered a priority victim is based upon home office guidance been which has configured within the Niche system. Audit performed walkthrough of the web form to confirm that this configuration responsive to the inputs entered on to the web form.

Audit performed a sample test of 10 victims cases, where it was confirmed that in all



Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
			monitoring and corrective action Action:- Communication strategy to be written and cascaded to relevant staff. Significant changes to be outlined and communicated via Weekly Order T/Chief Inspector Andy Goodall to ensure victim figures are available and presented as part of the divisional OPR performance packs for monitoring and corrective action		instances the needs of the victim had been assessed, with a priority assigned to their case.

4.3 Preferred Method of Contact

Observation: Upon initial contact with victims, officers should establish their preferred method and frequency of contact which should be recorded on the VCOP working sheet.

Audit testing identified that in ten out of twenty-five cases the contact section of the working sheet had not been completed and therefore there was no evidence that the preferred method and frequency had been established.

Risk: Failure to establish a victims preferred method of contact resulting in updates being made in a format which is not accessible/ understandable by the victim and non compliance with the Victims Code of Practice.

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.

Accepted in part

Introduction of Niche in February 2016 will supersede the use of CRMS and thus the need for working sheets. A communication strategy is in the process of being written to reiterate current requirements and outline the significant changes which will take effect from February 2016

The Force also produces a DPR report which contains details of those crimes where there has been no victim update for 22 days. These report figures are part of daily business in both pre-daily management meetings (DMM) on localities and also in divisional daily management meetings (DMM). Furthermore they are presented as part of the divisional OPR performance packs for monitoring and corrective action

Not Implemented

Audit performed a sample test of 10 victim cases on the Niche system, where it was confirmed that in one instance, the preferred method of contact was not established with the victim.

Refer to 4.4

31/1/2016

T/Chief Inspector Andy Goodall

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Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
			Action:- Communication strategy to be written and cascaded to relevant staff. Significant changes to be outlined and communicated via Weekly Order		
			T/Chief Inspector Andy Goodall to ensure victim figures are available and presented as part of the divisional OPR performance packs for monitoring and corrective action		

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
4.4	Victim Information Observation: Victims are entitled to receive a clear explanation of what to expect from the criminal justice process. The VCOP working sheet requires officers to confirm they have either provided the Victim with a Victim Information Pack (VIP) or referred them to Nottinghamshire Police Victim website. Audit testing identified that in fourteen out of twenty-five cases the officer had not confirmed this information had been provided or the referral had been made. Risk: Failure to 'signpost' victims to appropriate victim support material resulting in lack of information for them in respect of the different provisions available. This could result in increased vulnerability of victims and non compliance with the Victims Code of Practice.	with the Victim Information Pack and/ or referred to the information available on the	1	Action: Review and update the Victim Information Pack in line with the new amendments. Outline amendments in Communication Strategy and publish on internet. Confirm changes via Weekly Order	31/1/2016 T/Chief Inspector Andy Goodall	Audit performed a sample test of 10 victim cases on the Niche system, where it was confirmed that in three instances, it was not confirmed if the victim was provided with or offered the Victim Information Pack. Refer to Rec 4.5

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
4.5	Victim Information Pack (VIP) Observation: Victim Information Packs are available to provide a guide to all the services and support available to victims from reporting through to trail. A 'Right to Review' procedure has recently been introduced by the Force (enabling victims to request a review of a decision not to prosecute), however this was not detailed in the VIP to ensure victims are aware of this. In addition, the Force offers 'Restorative Justice'. This is the process of bringing together victims with those responsible for the crime, to find a positive way forward. Although this was listed as an 'out of court' disposal in the VIP, there was no detail included to inform them how they can take part, in line with the Code of Practice. Risk: Failure to inform victims of all support available to them resulting in an ineffective service provision, increased risk of revictimisation and non compliance with the Victims Code of Practice.	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).	2	Action: Review and update the Victim Information Pack in line with the new amendments. Outline amendments in Communication Strategy and publish on internet. Confirm changes via Weekly Order	31/3/2016 T/Ch Inspector Andy Goodall	Implemented Audit reviewed the Victim Information Pack (VIP), that was most recently updated in August 2019. Through review of the VIP, it has been confirmed that there is inclusion of the Right to Review procedure, including the instances in which a review can be requested; how a review will be conducted; in addition to how to request the review. Audit also confirmed that there is inclusion of details regarding the Restorative Justice Scheme, including the purpose of the scheme and how this can be obtained by the victim.



	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
4.6	Victim Updates Observation: When a victim is updated on the progress of the case this is recorded on the CRMS system. For the purpose of performance monitoring, an 'Aggrieved Updated' box should be ticked to acknowledge this update. Where the box is not ticked, this creates a report to management that the update may be overdue. Audit testing identified that in six out of twenty-five cases, updates had been made to the victim but the Aggrieved Updated box had not been ticked. Risk: Where acknowledgement of updates is not recorded in the CRMS this creates both unnecessary records on performance management information and additional checks carried out by officers.	when updates are provided to	2	Part Accepted Introduction of Niche in February 2016 will supersede the use of CRMS and thus the need for ticking an 'Aggrieved Updated' box. A communication strategy is in the process of being written to reiterate current requirements and outline the significant changes which will take effect from February 2016 Action:- Communication strategy to be written and cascaded to relevant staff. Significant changes to be outlined and communicated via Weekly Order	31/1/2016 T/Ch Inspector Andy Goodall	Audit have noted that since the implementation of the Niche system, in particular the use of the OELs have resulted in officers not requiring to perform this action. To confirm, the 'Aggrieved Updated' box no longer exists and where victims are updated on their case, this is captured within the OELs.

4.7	Victim Personal Statement (VPS)			Accepted in part		Implemented
4.8	Observation: Under the Victims Code, all victims should be given the opportunity to make a VPS to explain how the crime has affected them. This may then be read out in court if the defendant is found or pleads guilty. Audit testing on three cases, where the victim had given a statement and therefore should have been offered a VPS, identified that this offer had not been recorded on the CRMS system for two of these cases. It was acknowledged however that these cases were still ongoing and a VPS may be taken at a later date. In addition, the right to a VPS is included in the Victim Information Pack. Risk: Failure to offer a VPS statement resulting in lack of opportunity for the victims to explain how they have been personally affected and failure to comply with the Victims Code of Practice.	The offer/ availability of a VPS to the victim should be clearly communicated and acknowledged within the VCOP working sheet.	3	Introduction of Niche in February 2016 will supersede the use of CRMS and thus the need for ticking an 'Aggrieved Updated' box. A communication strategy is in the process of being written to reiterate current requirements and outline the significant changes which will take effect from February 2016 Action:- Communication strategy to be written and cascaded to relevant staff. Significant changes to be outlined and communicated via Weekly Order	31/1/2016 T/Ch Inspector Andy Goodall	Through a walkthrough undertaken of the Niche system, it has been confirmed that officers are able to record if an offer has been made for the victim to offer a Victim Personal Statement (VPS). For a case where the victim has offered a VPS, it was confirmed that the offer of this had been suitably captured within the system.
4.0	Victili Needs Assessificial			Accepted		Implemented



Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
Observation: Following a Victims Needs Assessment it should be evidenced within CRMS that the victim has been provided with the required level of support. Audit sample testing on five cases where the victim had been assessed as having 'priority needs' identified that in one case there was a lack of information recorded in CRMS to confirm that proactive victim support was ongoing. The victim in question was deemed vulnerable by disability. Although they had been routinely referred to the Victim Support service, and a letter was evidenced requesting the victim should contact the force if they require any further support, there was no evidence they had been visited for ongoing support and assessments or proactively referred to a specialist agency. Risk: Failure to evidence proactive referral to specialist agencies or provision of support for victims who have been assessed as having priority needs, leading to increased risk of revictimisation and non compliance with the Victim Code of Practice.	for referral to specialist agencies	2	Action: Work to be undertaken to identify specialist agencies able to provide additional support to victims. This to be communicated via the Communication Strategy and reiterated in a Weekly Order T/Chief Inspector Andy Goodall to ensure Niche incorporates the requirement to record any specialist referrals	31/1/2016 T/Chief Inspector Andy Goodall	Audit performed a sample test of 10 victim cases on the Niche system, where it was confirmed that in all instances, the victim was informed of the existence of specialist agencies for which referrals could be made.



4.9 **Training**

Observation: At the previous audit a recommendation was made to formally monitor key training relating to the Victims Code and reminders sent on a periodic basis to those individuals who have not completed the training.

The management response to this recommendation was that compliance is monitored with regular reports being produced and completion/ non completion reports sent to BCU/ Department Leads.

At the time of the current audit information was requested to confirm the number of officers who were required to complete this training but had not yet done so. It was found that the system for recording e-learning progress could only provide information on those officers who had completed the training rather than 'non-completers'. The Learning & Development Team were working to resolve this, however, given this information was not available, testing could not be undertaken to confirm that compliance was being monitored given that non completion reports are not being issued.

Risk: Failure to identify and monitor those officers who have not completed the mandatory e-learning for Victims Code resulting in a lack of assurance that officers have been adequately trained to ensure compliance with the Code.

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.

Accepted

Action:- T/Chief Inspector Andy Goodall to contact EMCHRS and ensure they provide 6 monthly updates on who has completed Compliance with the Code Training. This to be circulated to Heads of Department for appropriate action

30/6/2016

T/Chief Inspector Andy Goodall

Not Implemented

Audit were provided with the Victims Code E-learning completion rate at the time of the audit, with the compliance rate for Officers, PCSOs and Staff at 88%, 95% and 63% respectively.

Management have advised that Officers/Staff who have the not completed training have been emailed. However. it has been noted that the previously proposed recommendation establishing a system to follow uр compliance cannot be suitably evidenced.

Refer to Rec 4.6



	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility	Follow up findings – September 2020
4.10	Referral to Specialist Agencies					Implemented
	Observation: Following a victim needs assessment, victims are automatically referred to Victim Support Services. However, there could be instances where they require more specialised support, particular those with a 'priority' outcome following their assessment. The audit identified that officers make referrals based on their experience and knowledge; however there is no documented guidance/ list of agencies currently available for reference and to ensure consistency on the level/ quality of referrals by individual officers. It is acknowledged that the number of agencies/ organisations is continually changing, however it is deemed good practice to provide this guidance to officers to ensure consistency in the level/ quality of referrals by individual officers. Risk: Officers may be unaware of all available specialist support provisions resulting in priority needs victims not receiving the highest quality of support that is available to them.	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.	3	Action: Work to be undertaken to identify specialist agencies able to provide additional support to victims. This to be communicated via the Communication Strategy and reiterated in a Weekly Order	31/3/2016 T/Ch Inspector Andy Goodall	Audit reviewed a hard copy document, that serves as the directory of key local and national support services. A review of the document confirmed that this serves to provide officers with guidance for services that victims can be referred to. For greater resilience, audit have suggested to management that this should be stored electronically on the intranet. However, the initial recommendation proposed has been met, therefore this recommendation is now deemed to be implemented.

A1 Audit Information

Audit Control Schedule		
Client contacts:	Charlotte Radford, OPCC Chief Finance Officer	
	Mark Kimberley, Force Chief Finance Officer	
	Chief Inspector James Woolley	
	Chief Superintendent Gary Hooks	
	Nicola Wade, OPCC Head of Commissioning	
Internal Audit Team:	David Hoose, Partner	
	Mark Lunn, Internal Audit Manager	
	Moosa Bahadur, Senior Internal Auditor	
Finish on Site \ Exit Meeting:	25 th September 2020	
Draft report issued:	30th September 2020	
Management responses received:	16 th October 2020	
Final report issued:	16 th October 2020	

Scope and Objectives

Our audit considered the following risks relating to the area under review: Compliance

- Policies and procedures have been put in place to support officers in complying with the Code. Such guidance should include, but not be limited to, guidance in respect of:
 - Needs assessments
 - o Crime reporting work sheets
 - Referral mechanisms
 - Communications with the victim
 - Personal statements
 - Complaints procedures
- Systems are in place to ensure that actions taken for victims of crime are captured and are done so in line with the expectations laid out within the VCOP.
- There is appropriate monitoring of compliance with the VCOP including both qualitative and quantitative measures.
- There are appropriate forums in place within Nottinghamshire Police and the OPCC to review Force compliance to the code and action plans put in place to address areas of improvement.
- There is effective management and performance information available in respect of compliance with the Code and this information is utilised to put action plans in place to address areas of improvement.

Preparedness for Change

- There is appropriate governance over the proposed changes to systems in relation to VCOP.
- The Force has effective plans in place based on accurate management information and are correctly aligned to the proposed changes.

Lessons Learned / Feedback

- The OPCC utilises service user feedback to inform and improve both police and wider partnership services for Victims on an ongoing basis.
- The Force utilises feedback received in respect of the Victims it deals with and takes action to address areas of concern / takes opportunities to improve.

The objectives of our audit were to assess the adequacy and effectiveness of internal controls in operation with a view to providing an opinion on the extent to which risks in this area are managed. In giving this assessment it should be noted that assurance cannot be



Scope and Objectives

absolute. The most an Internal Audit Service can provide is reasonable assurance that there are no major weaknesses in the framework of internal control.

We are only able to provide an overall assessment on those aspects of VCOP that we have tested or reviewed. Testing has been performed on a sample basis, and as a result our work does not provide absolute assurance that material error, loss or fraud does not exist.

Definitions of Ass	Definitions of Assurance Levels					
Assurance Level	Adequacy of system design	Effectiveness of operating controls				
Significant Assurance:	There is a sound system of internal control designed to achieve the Organisation's objectives.	The control processes tested are being consistently applied.				
Satisfactory Assurance:	While there is a basically sound system of internal control, there are weaknesses which put some of the Organisation's objectives at risk.	There is evidence that the level of non-compliance with some of the control processes may put some of the Organisation's objectives at risk.				
Limited Assurance:	Weaknesses in the system of internal controls are such as to put the Organisation's objectives at risk.	The level of non-compliance puts the Organisation's objectives at risk.				
No Assurance	Control processes are generally weak leaving the processes/systems open	Significant non-compliance with basic control processes leaves the				

to significant error or abuse.	processes/systems open to error or abuse.
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Definitions of Recommendations				
Priority	Description			
Priority 1 (Fundamental)	Recommendations represent fundamental control weaknesses, which expose the organisation to a high degree of unnecessary risk.			
Priority 2 (Significant)	Recommendations represent significant control weaknesses which expose the organisation to a moderate degree of unnecessary risk.			
Priority 3 (Housekeeping)	Recommendations show areas where we have highlighted opportunities to implement a good or better practice, to improve efficiency or further reduce exposure to risk.			

A2 Statement of Responsibility

Status of our reports

We take responsibility to the Office of the Police & Crime Commissioner for Nottinghamshire and Nottinghamshire Police for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

This report is confidential and must not be disclosed to any third party or reproduced in whole or in part without our prior written consent. To the fullest extent permitted by law Mazars LLP accepts no responsibility and disclaims all liability to any third party who purports to use or reply for any reason whatsoever on the Report, its contents, conclusions, any extract, reinterpretation amendment and/or modification by any third party is entirely at their own risk.

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Victims Code of Practice (VCoP)



- Internal Audit commissioned by OPCC
- Purpose
 - Audit of controls and processes
 - Victim Code Compliance
 - Preparedness for change
 - Lessons learned



Previous Audit: December 2015 Outcome: Limited Assurances

Ten Recommendations:

- Two Fundamental
- Six significant
- Two Housekeeping

September 2020 Audit:

Outcome: Satisfactory Outcome

Six Recommendations:

- Three Significant Recommendations
- Three Housekeeping Recommendations









Mazars 2020 Recommendations: Significant

Observation: Satisfaction Surveys

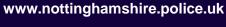
Requirement: Limited crime type range and sample size used, not providing a true reflection.

Action undertaken:

- Nottinghamshire Police Insight & Research Team completed:
- Over 1200 surveys last year covering:
- Domestic Abuse, Sexual Offences, Hate and DVDS (Clare's Law)
- Nottinghamshire Police Information Compliance Audit completed:
- Over 350 specific Victim Code audits completed MoJ recommend 120 surveys
- Regional Forces consulted no standard approach, varying practices and data collations
- On going review and development via V & W Assurance Group (including partners)
- Mazars have been updated and feedback "Notts in a position of strength in having oversight of victim satisfaction levels"









Mazars 2020 Recommendations: Significant

Observation: Training

Recommendation: A regime of non-completion of Ncalt training module

Action undertaken:

- Current completion compliance:
- 88% Police Officers
- 95% PCSO
- 63% Police Staff Investigators



- New Ncalt Victim Code package went live in April 21.
 - Monthly compliance report completed on dept/team level
 - Quarterly monitoring at V & W Assurance Group



Mazars 2020 Recommendations: Significant

Observation: Victim Information

Recommendation: All victims should be offered Victim Information Pack (VIP), where the

VIP is not supplied reason to be recorded.

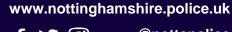
Action undertaken:

Webform and Niche mandated fields have now been updated to include reasons why VIP not

supplied.







Mazars 2020 Recommendations: Housekeeping

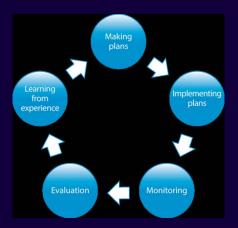
Observation: Action Plan

Recommendation: Proposed changes to Victims Code to be monitored by Victims & Witness

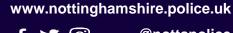
Assurance Group.

Action undertaken:

All proposed changes and actions undertaken monitored/recorded at V&W Group







Mazars 2020 Recommendations: Housekeeping

Observation: Victim Code/VCOP Guidance

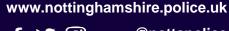
Recommendation: The Force to produce condensed Victim Code guidance

Action undertaken:

- Feedback sought from frontline officers:
- Internal and External Websites refreshed
- Revised Communications strategy undertaken
- New Force Victims Branding











Mazars 2020 Recommendations: Housekeeping

Observation: Preferred Method of contact

Recommendation: Officers to be reminded of requirements.

When entering onto Niche to complete all required information

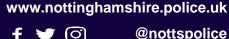
Action undertaken:

Webform mandated fields have now been replicated in Niche. The following are mandatory fields:

- Preferred method of contact
- Victim Services Offer
- Victim Information Booklet supplied
- Required Update Frequency
- **Priority Category**
- Officer Details
- All Changes communicated via Intranet bulletins







Victims Code of Practice (VCoP)

Next Steps?

- Working with National and Regional Police colleagues on VCOP developments
- Working with partners CPS, Probation, Courts to ensure compliance
- National Niche development to improve recording
- Summer training plan for all front line staff and officers
- Future communications strategy to support Victims Code
- Making better use of technology (Victims Code App)









