

<b>For Information</b>	
<b>Public/Non Public</b>	<b>Public</b>
<b>Report to:</b>	<b>Joint Audit and Scrutiny Panel (JASP)</b>
<b>Date of Meeting:</b>	<b>29 July 2021</b>
<b>Report of:</b>	<b>Deputy Chief Constable</b>
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<b>Agenda Item:</b>	<b>07</b>

## **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 1, 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 review 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 With regards to HMICFRS inspections (Appendix A) there are 39 open recommendations across the various HMICFRS reports. There are 10 closed recommendations. These closed recommendations have been reviewed by HMICFRS and they have assessed the Force's evidence as suitable to close and show it as complete.
- 4.3 Of the remaining 39 open recommendations, 7 have been assessed by the HMICFRS as requiring reality testing. This will be undertaken during the Integrated PEEL Inspection. HMICFRS will then confirm whether they are happy to close them.
- 4.4 In relation to internal audits, which have been undertaken by Mazars, there are 60 open recommendations.
- 4.5 There are currently 0 actions which have exceeded their target date.

### Recent Inspection Activity

Date of Inspection	Inspection Area	Date Report Received	Final Grading	Status
October 2020	Covid-19 Policing Inspection	April 2021	N/A	Recommendations entered onto 4Action
March 2021	Fraud Inspection	-	N/A	Awaiting report
March 2021	Neurodiversity in the Criminal Justice System	-	N/A	Awaiting report
April 2021	Policing of Vigils	April 2021	N/A	No recommendations. For information only

### Forthcoming HMICFRS Inspections

Date of Inspection	Inspection Area	Status
July 2021	Integrated PEEL Inspection – Serious and Organised Crime	Confirmation received force will be inspected July 2021. Timetable agreed.
September 2021	Integrated PEEL Inspection – Armed Policing Inspection	Confirmation received force will be inspected September 2021. Work in progress.
September 2021	Integrated PEEL Inspection – Victim Service Agreement	Confirmation received force will be inspection September. Work in progress.
November 2021	Integrated PEEL Inspection – Counter Corruption	Confirmation received force will be inspection November. Timetable awaiting sign off. Documents submitted, data currently being collated. Deadline for data 1 <sup>st</sup> October 2021.

### Publications

Date of Publication	Inspection Area	Status
February 2021	Stop and Search	Report published. Recommendations sent out for management update
March 2021	Policing Protests	Report published. Recommendations sent out for management update
March 2021	Roads Policing	Report published. Recommendations sent out for management update

June 2021	Policing Domestic Abuse during the Covid Pandemic	Report published. Error identified in report which has been brought to the attention of HMICFRS. Recommendations sent out for management update
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#### 4.5 Recent and Forthcoming Audits

##### Recent Audit Activity

Date of Audit	Auditable Area	Date Report Received	Final Grading	Status
February 2021	Risk Management	February 2021	Limited Assurance	Circulated for management comments, report not agreed
April 2021	Wellbeing	April 2021	Limited Assurance	Circulated for management comments, report not agreed

##### Forthcoming Audits

Date of Audit	Auditable Area	Status
June 2021	Performance Management	Audit currently being undertaken
June 2021	Firearms Licensing	Audit currently being undertaken
Unknown	Core Financials	N/A
Unknown	Procurement	N/A
Unknown	Business Change	N/A
Unknown	MFSS Transfer	N/A
Unknown	Health and Safety	N/A
Unknown	Information Services	N/A
Unknown	Partnerships	N/A
Unknown	Workforce Planning	N/A
Unknown	Information Assurance	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 HMICFRS inspection recommendations.

12.2 Appendix B – Overview of Mazars internal audit recommendations.

### HMICFRS INSPECTIONS CURRENT OVERVIEW

Date	Title	Recommendation	Total Number Outstanding	Total Number Closed
27 Nov 2018	<b>Policing and mental health: Picking up the pieces</b>  <b>STATUS – Evidence submitted to HMICFRS for review. The reason that one recommendation remains open is that HMICFRS will reality test when they undertake their Integrated PEEL Inspection in September 2021.</b>			
		<p>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.</p> <p>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).</p> <p>The force took part in the NPCC '24-hour snapshot' exercise and have forwarded the substantial information to the NPCC for the national analysis.</p>	1	0
10 April 2019	<b>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</b>  <b>STATUS – 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.</b>			

Appendix A

		<p>Within six months chief constables should ensure that forces record stalking or harassment crimes if appropriate when victims report breaches of orders.</p> <p>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.</p> <p>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.</p>	1	0
17 July 2019	<p><b>The poor relation: The police and Crown Prosecution Service's response to crimes against older people</b></p> <p><b><u>STATUS</u> – Evidence submitted to HMICFRS for review. Two recommendations remain open, which will be reality tested when HMICFRS undertake their Integrated PEEL Inspection in September 2021.</b></p>			
		Within six months, chief constables should make sure that victim needs assessments are always completed.	2	0
		Within three months, chief constables should conduct analysis of the current and future demand for adult safeguarding, including the gap in knowledge that may exist from those cases where referrals aren't made because of errors or omissions. This analysis should be incorporated into force management statements (FMSs).		



27 Sep 2019	<b>Shining a light on betrayal: Abuse of position for a sexual purpose</b>  <b><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.</b>			
		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	0
		<p>By April 2020, all forces that haven't yet done so should:</p> <ul style="list-style-type: none"> <li>• record corruption using the national corruption categories;</li> <li>• produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and</li> <li>• establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people.</li> </ul> <p>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.</p> <p>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.</p>		
23 Jan 2020	<b>Joint Inspection - Evidence Led Domestic Abuse Prosecutions</b>			
		Police should ensure that investigations and decisions to take no further action in domestic abuse cases receive the same robustness of supervisory oversight as other domestic abuse cases.	0	5

Appendix A

		Police forces should ensure that training, messaging and guidance is clear that evidence led cases should benefit from the same quality of investigation, early gathering of evidence and supervisory oversight as other domestic abuse cases, particularly in cases where the victim does not support police action. Domestic abuse champions should reinforce this message.		
		Police forces with domestic abuse champions should raise awareness of the role and seek to utilise them to maximum effect.		
		The police should review training plans to ensure that all appropriate staff, both frontline officers and investigators, are trained how to handle domestic abuse cases.		
		Police supervisors and Crown Prosecution Service legal managers should maximise opportunities to share examples of good work and successful outcomes with their teams.		
<b>27 Feb 2020</b>	<b>National Child Protection Inspections 2019 thematic report</b>			
		We recommend that chief constables on those forces not yet inspected by the NCPI or JTAI take steps to identify and implement good practice and the learning highlighted from these programmes. This may include engaging with those forces who have been inspected, direct contact with the HMICFRS child protection lead or participating in a regional or national learning event.	0	3
		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.		
		We recommend that chief constables take steps to reduce the unnecessary criminalisation of children. Such steps could include (but		

Appendix A

		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	<b>A joint thematic inspection of Integrated Offender Management</b>  <b><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.</b>			
		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.		
		Define their IOM operating model and produce practice guidance that sets out clearly what is required by each agency at every stage of the IOM supervision process.		

<b>9 Mar 2020</b>	<b>Counter-terrorism policing - An inspection of the police's contribution to the government's Prevent programme</b> <b><u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.</b>			
		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 contribute to managing risk.	1	0
<b>9 July 2020</b>	<b>A call for help - Police contact management through call handling and control rooms in 2018/19</b> <b><u>STATUS</u> – Evidence submitted to HMICFRS for review. All recommendations will be reality tested when HMICFRS undertake their Integrated PEEL Inspection in September 2021.</b>			
		Each force where there is a vulnerability desk should make sure it makes a positive contribution to initial safeguarding	7	0
		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		

Appendix A

		We expect to see all 43 forces get involved in the single online home and the social media projects		
		We expect the police service during 2020 to make sure that it has agreed a standard for how quickly forces respond to 999 calls. The absence of a national set of agreed response times for emergency calls means it is hard to make meaningful comparisons		
		We expect the police service during 2020 to make sure it has effective national guidelines, quality assurance and assessment in place for resolution without deployment		
July 2020	<b>PEEL spotlight report: The Hard Yards Police to police collaboration</b>  <b><u>STATUS</u> – Awaiting methodology from National Police Chiefs Council, College of Policing and Home Office - currently delayed due to Covid-19.</b>			
		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
July 2020	<b>Roads Policing: Not optional - An inspection of roads policing in England and Wales</b>  <b><u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.</b>			
		With immediate effect, chief constables should make sure that appropriate welfare support is provided to specialist investigators and family liaison officers involved in the investigation of fatal road traffic collisions.	8	1
		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.		

Appendix A

		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 that their force (or where applicable road safety partnerships of which their force is a member), comply with (the current version of) Department for Transport Circular 1/2007 in relation to the use of speed and red-light cameras.		
		With immediate effect, chief constables should make sure: <ul style="list-style-type: none"> <li>• 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.</li> <li>• that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and</li> <li>• There is evaluation of road safety initiatives to establish their effectiveness.</li> </ul>		
		With immediate effect, chief constables should make sure that roads policing is included in their forces strategic threat and risk assessments, which should identify the areas of highest harm and risk and the appropriate responses.		
		The awareness and understanding of the changes in the Professionalising Investigation Programme within police forces is an area for improvement.		
		The efficient and effective exchange of all collision data with other relevant bodies is an area for improvement.		

Appendix A

		Force-level support to national roads policing operations and intelligence structure is an area for improvement.		
<b>8 Dec 2020</b>	<b>Pre-charge bail and released under investigation: striking a balance</b> <b><u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.</b>			
		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.		
<b>17 Dec 2020</b>	<b>Safe to share - Report on Liberty and Southall Black Sisters super-complaint on policing and immigration status</b> <b><u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.</b>			
		<p>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).</p> <p>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.</p>	4	0

Appendix A

		<p>Notes to recommendation 1</p> <p>This recommendation to stop information sharing only applies to victims of domestic abuse.</p> <p>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.</p> <p>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.</p>		
		<p>To chief constables:</p> <p>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:</p> <ul style="list-style-type: none"> <li>• ensure there is a proper policy and practice framework in place for officers to work within;</li> <li>• 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.</li> </ul>		



## Appendix A

		<ul style="list-style-type: none"> <li>• promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse;</li> <li>• promote awareness within their forces of any existing pathways to specialist organisations for supporting victims with insecure immigration status;</li> <li>• 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</li> <li>• promote police engagement in regular outreach community work, as highlighted as good practice in this report.</li> </ul>		
		<p>To chief constables and police and crime commissioners (or equivalents):</p> <p>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.</p>		
		<p>To all recipients of recommendations from this investigation:</p> <p>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.</p>		

<b>10 Feb 2021</b>	<b>An inspection of the effectiveness of the Regional Organised Crime Units</b> <b><u>STATUS</u> – Evidence submitted to HMICFRS for review. Awaiting feedback.</b>			
		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.		
<b>26 Feb 2021</b>	<b>Disproportionate use of police powers - A spotlight on stop and search and the use of force</b> <b><u>STATUS</u> – Evidence currently being collated by Superintendent for submission to HMICFRS.</b>			
		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.		

## Appendix A

		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.		
		<p>By September 2021, forces should:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> <li>• 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.</li> </ul>		
		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.		

**INTERNAL Audits 2020/21**

<b>Date</b>	<b>Title</b>	<b>Recommendations</b>	<b>Total Number Outstanding</b>	<b>Total Number Closed</b>
<b>Sep 2020</b>	<b>Victims' Code of Practice September 2020</b>			
		The Force should produce a condensed guide to the Victims' Code of Practice, following the introduction of the currently proposed changes.	16	0
		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.		

Appendix B

		<p>A regime should be established as to how non-completion of the training module will be escalated by the Force.</p> <p>This could entail the Force sending regular updates to line managers details of any Staff or Officers with training that is overdue for completion.</p>		
		<p>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.</p>		
		<p>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.</p>		
		<p>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.</p>		
		<p>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.</p>		
		<p>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).</p>		

Appendix B

		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.		
<b>Oct 2020</b>	<b>Estates Management Oct 2020</b>			
		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.	3	0
		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.		

Appendix B

		<p>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:</p> <ul style="list-style-type: none"> <li>• Monitoring the number of repairs completed right the first time by contractors fulfilling SR's.</li> <li>• Recording and reporting on the results of customer satisfaction surveys for newly built and recently refurbished projects and;</li> </ul> <p>Monitoring the number of SR's received for newly built or recently refurbished projects in the first 12 months following completion.</p>		
<b>Dec 2020</b>	<b>Workforce Planning December 2020</b>			
		<p>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.</p>	2	0
		<p>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.</p> <p>Alongside this exercise, individuals who are able to assume these positions in a short / medium / long term capacity should be highlighted.</p>		
<b>Jan 2021</b>	<b>Information Assurance Follow up January 2021</b>			
		<p>As intended, the organisation must continue to liaise with NPRIMT in relation to the GIRR accreditation process.</p>	2	0

Appendix B

		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.		
<b>Feb 2021</b>	<b>Core Financial Systems Assurance Feb 2021</b>			
		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.		



Appendix B

		<p>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:</p> <ul style="list-style-type: none"> <li>• No. of overpayments &amp; underpayments.</li> <li>• Value of overpayments &amp; underpayments.</li> <li>• Reasons for overpayment i.e. late notification by Force, MFSS missed SLA for Payroll Date etc.</li> </ul>		
<b>Feb 2021</b>	<b>Debt Management Feb 2021</b>			
		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.	2	0
		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.		
<b>Feb 2021</b>	<b>GDPR Follow Up February 2021</b>			
		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.		

Appendix B

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.		
		<p>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:</p> <ul style="list-style-type: none"> <li>• The registers presented;</li> <li>• The risks discussed; and</li> </ul> <p>The decisions reached / action plans devised.</p>		

Appendix B

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.	9	0
		Policies and Procedures should be made available for Staff and Officers to view on the intranet.		
		<p>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.</p> <p>Consideration should be made as to how to record the training attendance for all Officers.</p>		
		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.		
		<p>The Force should regularly perform reconciliations of locations for property that is held against records maintained on the Niche system.</p> <p>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.</p>		
		<p>The Force should review and streamline the C17 form.</p> <p>Where a C17 form has not been completed correctly, this should be recorded and referred to the Officer responsible.</p>		

Appendix B

		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.		
<b>April 2021</b>	<b>Wellbeing April 2021</b>			
		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.	4	0
		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.		
		<p>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.</p> <p>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.</p>		
		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.		

Appendix B

April 2021	Complaints Management April 2021			
		The OPCC should remind staff of the importance of issuing terms of references to complainants.	7	0
		The fix for the system issue should be sought, so that closed complaints can be accurately updated on the Centurion system.		
		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.		