

Annual Governance Statement 2017/18

1. This statement is expressed in the name of the PCC (subsequently to be referred to in this document as the PCC) and the accounts of the CC. It covers the financial year 2017/18 (but extends to cover the period to the signing of the Statements of Accounts at the end of July 2018). The PCC and the CC are responsible for ensuring that business is conducted in accordance with the law and proper standards and that public money is safeguarded and properly accounted for, and is used efficiently and effectively. More specifically, there are a number of statutory responsibilities that flow from the [Police Reform and Social Responsibility Act 2011. \(PRSRA\)](#)
2. In discharging these various responsibilities both are responsible for putting in place proper arrangements for the governance of their affairs including the management of risk.
3. The PCC and CC endorse the code of governance consistent with the principles of the Chartered Institute of Public Finance and Accountancy (CIPFA)/Society of Local Authority Chief Executives (SOLACE) Framework, "[Delivering Good Governance in Local Government](#)". This statement explains how the PCC and CC comply with that Code and also meet the statutory requirement to prepare an AGS. The PCC and CC endorse and comply with the CIPFA statement on the role of the CFO in local government 2010 as set out in the application note, delivering good governance in local government. Both also endorse and comply with the relevant specific codes produced by both CIPFA and the Home Office arising out of, or related to the [PRSR Act 2011](#). This includes the March 2014 CIPFA Statement on the role of the CFO and relevant parts of the [Account and Audit Regulation 2011](#) as amended and the Home Office Financial Management Code of Practice.
4. The CIPFA/Solace framework was revised for 2016/17, and the AGS was reviewed and refreshed last year. The new presentation and layout of the revised AGS was found to be clear and user-friendly, and so this approach has been retained for 17-18. The document is subdivided into a number of areas, all of which relate to one of the seven principles in the framework:

Principle A: behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

Principle B: ensuring openness and comprehensive stakeholder engagement

Principle C: defining outcomes in terms of sustainable economic, social and environmental benefits

Principle D: determining the interventions necessary to optimise the achievement of the intended outcomes

Principle E: developing the entity's capacity, including the capability of its leadership and the individuals within it

Principle F: managing risks and performance through robust internal control and strong public financial management

Principle G: implementing good practices in transparency, reporting, and audit to deliver effective accountability

The governance framework for the Office of the Police and Crime Commissioner (OPCC) was revised in 16-17 following the election of the new [PCC for Kent, Mr Matthew Scott](#). This has been developed and refined in 17-18, but there have been few significant changes.

The framework enables the PCC to monitor the achievement of objectives including VfM, has been developed to reflect the PCC's priorities, and will continue to transform and adapt.

Kent Police has its own Governance Framework based around the same seven principles described above and linking directly to the [College of Policing's Code of Ethics](#). The primary decision making forum for the force is the Chief Officer Strategic Meeting which meets weekly and decides the strategy and direction of the force. Below this are various other strategic and tactical boards including the Strategic Change Board, Force Resource Board and Directorate Boards each chaired by the relevant Chief Officer lead. Crucially the force meets with and is held to account by the PCC formally at the [Performance and Delivery Board](#) and also weekly at CC and PCC meetings.

These frameworks remain an expression of the systems, processes, culture and values by which the work of the PCC, the OPCC, and Kent Police, is directed and controlled and how it accounts to, engages with, and provides leadership to the communities they serve.

Vision and Leadership: the Police and Crime Plan and Holding to Account, and the Control Strategy

- **Principle C**

[The Police and Crime Plan, 'Safer in Kent: The Community Safety and Criminal Justice Plan'](#) sets out the strategic vision of the PCC from April 2017 to March 2021. This sets the direction for the CC, and articulates the PCC's vision for Kent.

The Plan sets out the basis for Leadership of the organisations as being strong ethics, transparency and integrity at all times. There are three guiding principles in the Plan, namely that 'People suffering from mental ill health need the right care from the right person'; 'crime is important, no matter where it takes place'; and 'vulnerable people must be protected from harm'.

[The Police and Crime Plan](#) also helps guide the agendas of the [Police and Crime Panel \(PCP\)](#), which meets regularly in public and is responsible for reviewing and reporting on the actions and decisions of the PCC. The Panel recently agreed the PCC's proposal for the precept, and reviewed and provided positive feedback on the revised Plan.

One of the principle ways that the PCC holds Kent Police to account for delivery of the [Safer in Kent Plan](#) is through his quarterly Performance and Delivery Board. It is a meeting held in public, and the CC is required to attend and answer questions about policing in the county. The agenda includes items on Force Performance, Police and Crime Plan Delivery, Finance, People and Collaboration. The CC is also required to submit papers ahead of the meeting and these are published on the website.

Through recent discussion with the CC, the PCC has determined however that it is not necessarily helpful to have two separate papers relating to Force Performance and Police and Crime Plan Delivery – effectively performance is delivery of the Police and Crime Plan. As a result, from March 2018, the agenda includes an item titled 'Safer in Kent Plan: Delivery & Performance'. In addition, the PCC has provided some guidance on the style of paper to ensure it reflects the totality of policing linked to the plan. As a key area of focus, this development will be monitored closely over the coming year to ensure the appropriate level of support and challenge.

As well as the [Performance and Delivery Board](#), the PCC has regular one-to-one meetings with the CC, conducts the CC's annual Personal Development Review and attends the Force Culture Board, chaired by the CC. In addition, there continues to be regular attendance by senior OPCC staff at Force meetings, including the Force Performance Management Committee, and one-to-one meetings at Head of Department level.

The issue of mental health is considered a 'golden thread' by the PCC, and runs through all governance strands and arrangements. In addition to being represented on the Kent and Medway Mental Health Crisis Care Concordat Strategic Group, the PCC chairs a quarterly Mental Health & Policing Oversight Board. With Chief Officer and Chief Executive representation from Kent Police, Kent and Medway NHS and Social Care Partnership Trust (KMPT), West Kent Clinical Commissioning Group and South East Coast Ambulance Service, the purpose of the board includes:

- reviewing delivery of the Kent Police and KMPT Mental Health Strategy;
- maintaining a strategic overview of performance across mental health crisis care services in Kent and Medway;
- enhancing partnership working in order to support the delivery of safe, effective and timely care for those in crisis.

The Board allows open and honest dialogue between partners, with a focus on ensuring those with mental health issues who come into contact with Kent Police for whatever reason, receive the right care, from the right person, at the right time. Discussions to date have included the operation

of triage schemes within the county, the effective management of those who repeatedly contact the emergency services inappropriately, and the impact of changes to the Mental Health Act 1983 introduced by the Policing and Crime Act 2017 (for further detail, see update to risks from previous year). The work of this Board will continue to develop over the coming year.

The governance framework around managing crime is well established, with the OPCC having appropriate access to internal Kent Police data, as well as external data, including the quarterly ONS Crime in England and Wales Statistical Bulletins. However ongoing work by individual forces to improve crime recording practices makes interpretation of trends over time, especially between Forces, difficult. As a result, within the [Police and Crime Plan](#), the PCC makes it clear that progress will not be judged on stipulated numerical targets, but will instead consider other feedback, for example from Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) reports and other independent publications.

The Force has a four year Control Strategy that is reviewed annually. It takes into account national policing issues, policing priorities for Kent (including joint working with other public sector agencies) and the direction set by the PCC for Kent. Nationally, there is a greater emphasis on 'vulnerability' as an issue: as a priority for the Home Secretary, it is subject to national scrutiny and independent inspection by HMICFRS. The Control Strategy already features many of the key themes – sexual exploitation, abuse, drugs, gangs and human trafficking. The Police, the PCC and other key bodies are working together to raise awareness of these issues in order to protect both adults and young people from harm, support victims of crime by guaranteeing their rights through the [Victims' Code](#), tackle hate crime and ensure those perpetrating serious and heinous crimes are brought to justice.

The [Force's Mission, Vision, Values and Priorities](#) have been clearly communicated by the CC and are embedded within inSite, the force's intranet and available to all officers and staff. These simple, clear and effective statements can be summarised by the Chief's mantra of 'Do the right thing' which ties to the Code of Ethics.

The Force Culture Board, chaired by the CC, helps ensure all officers and staff have an open forum to raise issues with the Chief in an open and transparent forum. The Force uses an on-line tool, rolled out force-wide which gives a 24/7 conduit for all staff to raise questions and make suggestions around continuous improvement and the use of resources. Each of these questions are reviewed by a Chief Officer along with the replies with regular reports going to the Chief Officer Strategic Meeting (COSM) summarising the activity and suggestions.

The Force has been rated as outstanding for Leadership in the last two years Police Efficiency, Effectiveness and Leadership (PEEL) assessments by HMICFRS. There is a substantial body of evidence behind this assessment, including the [Force's Mission, Vision, Values and Priorities](#) as well as the Culture Board.

Open and transparent communication and engagement, and accountability

- **Principles B and G**

On 1 April 2017 the PCC published his Police and Crime Plan, titled [Safer in Kent: The Community Safety and Criminal Justice Plan](#). The PCC committed to updating the Plan regularly in line with what local communities want, recognising that he has a duty to consult with victims and the wider community.

The PCC launched his [Annual Policing Survey](#) to the public on 23 June 2017 as an online form available in multiple languages. A variety of methods of engagement were used to publicise it and encourage participation including a press release, social media, e-newsletters, letters to key stakeholders and the Kent Police intranet. Additionally, hard copies of printed leaflets were displayed in some public buildings and were handed out at large-scale events such as the Kent Police Open Day and at the Kent County Show. The PCC also engaged directly with partner agencies and promoted the survey at private briefings and residents' meetings.

The survey closed on 10 January 2018 with 1,661 responses received out of a population of 1,820,400. Against the industry standard confidence level of 95%, this equates to a margin of error of just 2.4% in the data received – statistically significant enough to offer reliable data. Effective engagement of this nature is vital for the PCC, in terms of his legitimacy and to ensure that his plan reflects the needs and aspirations of Kent’s residents, and is set out to some degree in the [Safer in Kent Plan](#) (page 12).

The PCC again engaged in an open and transparent way in announcing his [policing precept proposal for 2018/19](#). A blog was posted on the OPCC website and sent to local media. The PCC participated in a number of local radio and TV interviews and explained what the additional precept funds would be spent on. This also enables taxpayers to hold him to account in future over whether the promised uplift in police officer numbers has been delivered.

In the interests of transparency, a report summarising the responses received to both the [Annual Policing Survey and the precept proposal](#) was published on the OPCC website and sent to the [Kent and Medway Police and Crime Panel](#). It openly demonstrates how the public’s views have helped shape the spring 2018 refresh of the [Safer in Kent Plan](#).

A paper setting out the OPCC’s wider communications plan was submitted to the [Kent and Medway Police and Crime Panel](#), which noted the active public engagement the PCC has entered into.

The PCC has established regular meetings with the Chair of Panel, representation on the relevant boards such as the Kent and Essex Collaboration Board and the Kent and Medway Crisis Care Concordat Steering Group, and hosts regular partners’ briefing days at the OPCC. There is a regular cycle of visits to local Community Safety Partnerships, and the PCC and their senior officers attend the Kent Criminal Justice Board and Probation services. In addition, there is a programme of proactive engagement with community groups and stakeholders representing harder to reach communities. This includes visits to Kent Mosques and the Vaisakhi celebrations, plus the Voluntary Police Cadets, schools, Kent Youth Council and the Youth Parliaments.

The [OPCC website](#) is kept up to date, compliant with the necessary legislation and open and accessible, for which a [CoPaCC OPCC Transparency Mark](#) has again been achieved. It meets national accessibility standards and is available to view in a multitude of different languages; it is optimised for mobile devices; and allows users to request a meeting with the PCC, contact the Office, or submit funding bids online.

An [Annual Report](#) is published and taken to the [Police and Crime Panel](#) for public consideration, and all major decisions are documented in standard format and published on the website as per the requirements of the [Specified Information Order](#). All reports, unless confidential, are published on the PCC’s website, as are notes from the [Performance and Delivery Board](#) and the minutes of the [JAC](#).

The PCC has [Schemes of Consent for the statutory officers](#) and the [CC](#), and all policies are owned by a specific individual and reviewed annually.

These policies are reviewed regularly with the policy owner charged with ensuring they remain up-to-date and accurate with any changes consulted on and communicated to all officers and staff through email and or the intranet.

The [Financial Regulations](#) cover both organisations and are maintained between the Force and PCC’s CFOs and reviewed annually. These are shared with budget holders and managers to ensure best practice and follow the schemes of consent outlined above.

The Force’s Culture Board is open to all officers and staff. This is replicated across directorates and, along with an open, on-line communication tool on the intranet allows staff to express their ideas and receive replies to their questions and comments. This later tool has proven to be very widely used and is reviewed at a Chief Officer level to ensure the corporate replies are timely and comprehensive as well as being actioned if appropriate.

Kent Police has a contact management work-stream with one of the aspects being how the public interacts with it via the [Kent Police website](#). Online crime recording is now operational and work is on-going to facilitate live chat and the accessing of some services such as payment of licenses this

will include recording crime, getting advice on frequently asked questions and crime prevention tips. These enhancements also include functionality which will significantly improve the recruitment process for prospective new police officers and ultimately members of staff too. The new portal will also include functionality to enable public interaction which will be used to gauge public opinion on service quality, visibility and confidence in the service.

The Force maintains a Research Bureau which is responsible for undertaking surveys with the public of Kent. This helps inform the force around public perceptions of policing, fear of crime and overall satisfaction with the service. The findings from this research help inform the Chief Officer Team around resource allocation and whether the force is providing a quality service to the public it serves.

Decision making, and risk management *Including a review of the mitigation of the risks identified last year, and issues identified for this year*

- **Principle F**

The Force and the PCC have risk registers, both at a strategic and operational level. These are reviewed and challenged by the JAC. The Force strategic risk register is managed by a senior member of the CC's team and operational risks are managed at all levels throughout the organisation. The OPCC's risk register process is led by the PCC's CFO and features as part of routine discussion on overall delivery in both the PCC's weekly meetings with his senior team, and senior officers' management meetings. Understandably, the Force's risk management needs to be much more complex given the size of the organisation and the inherent risks in operational policing. Recent audits have painted a generally positive picture of increasing risk maturity for both organisations. The most recent audit of risk management was more restricted in its scope, looking only at the risk assurance processes in place. It stated that the OPCC could take substantial assurance from its processes, and that Kent Police could take partial assurance. However, Kent Police and RSM believe that the overall risk management processes are fit for purpose and believe the lower rating on

this element is in part owing to the process being newly established. Both registers form part of the established management processes within respective operations and are used as a key driver for improvement. They form the basis of the Internal Audit programme delivered by our internal auditors and reported to the JAC.

The Force holds an annual review of all strategic risks chaired by the Director of Corporate Services and with the PCC's CFO and Chair of the JAC as panellists. All risk owners are invited to the meeting to explain the risk and its mitigation along with how it is being pro-actively managed by the Force. In addition to this challenge day, changes and updates to the Risk Register are reported to the Chief Officer Strategic Meeting (COSM) quarterly a process designed to ensure transparency and ensure all organisational risks are understood and balanced against resources and demand.

There is a comprehensive, interlinked approach to the governance and oversight of decision making and performance, as outlined in part under 'Vision and Leadership'. As well as attending the [Performance and Delivery Board](#), the Police and Crime Panel members receive a briefing from the CC annually, and the minutes from the Board are supplied to the Panel on a regular basis. HMICFRS reports are a standing item at both the [Performance and Delivery Board](#) and the [JAC](#) and the Chief Executive in the OPCC regularly meets with the Deputy CC to review the reports and performance against them.

The Financial reports have become more detailed and are provided for scrutiny by the Chief Officer teams, the PCC, the relevant Force and PCC's Boards and the JAC. The [JAC](#) receives standing budget monitoring reports and reports on the Statement of Accounts.

There is the established framework of the Scheme of Consent, [financial regulations](#) and contract standing orders that both organisations adhere to, as well as the work of the internal and external auditors. The internal audit plan is set in consultation with both organisations and with direct reference to their respective risk registers. The External Auditors provide the [annual audit letter](#) which confirmed that both organisations had the necessary and effective arrangements in place for securing VfM governance and internal

controls, and have issued an unqualified opinion on the accounts for the last year, we include the following from the above report:

Their 17/18 report gave an unqualified opinion, and the post opinion letter of August 2018 states:

In our audit report for the year ended 31 March 2018 issued on 10 July 2018 we reported that, in our opinion, in all significant respects, the Police and Crime Commissioner for Kent had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ending 31 March 2018.

Both the internal and the external auditors attend the JAC and have access to members when officers are not present to ensure all issues are raised when needed.

There is on-going work building and developing a performance framework that captures outcomes and benefits realisation to help demonstrate VfM for both the PCC in holding the Force to account, and for commissioned services. The Force facilitated two Business Case masterclasses with speakers from the Office of the Police and Crime PCC, Corporate Finance and also from PA Consulting. These workshops have been focussed on improving the quality of business cases and ensuring that not only are the costs accurately and completely described but the benefits are also clearly articulated.

[CIPFA published a revised Treasury management Code of practice in late December 2017](#) and the Ministry of Housing, Communities and Local Government issued revised Guidance in February 2018. However, as CIPFA's Local Authority Guidance Notes have not yet been published no changes were required to the [2018/19 treasury management strategy](#). The impact of these new publications on future strategies will be monitored in 2018/19.

The risks identified last year are outlined below, with the actions/mitigations taken. The current areas of risk are highlighted at the end of this section, and the areas for development and opportunity in the broader governance framework are identified throughout this document and are summarised as an action plan at the end.

Ongoing from the previous year:

- a. Impact of Athena;
This risk related to delays to the go-live date for Athena and the potential longevity of its legacy system, Genesis. A substantial upgrade was implemented to Genesis ensuring business continuity until the Athena go-live date mitigating the operational risk to the Force.
- b. Responding to the [Policing and Crime Act 2017](#);
The Act received Royal Assent on 31 January 2017 and its provisions have been introduced in stages throughout the year.

There is a new statutory duty on the police, fire and rescue and ambulance service to keep opportunities to collaborate under review and a requirement to collaborate with one another where it is in the interests of either their efficiency or effectiveness.

It included provisions that enable a PCC to take on responsibility for the governance of fire and rescue in their area. However, recognising that local leaders are best placed to identify what will work best, the government did not mandate what action PCCs should take; instead offering four options. The Kent PCC took the decision to opt for the Representation Model (at this time), and requested membership of the Kent and Medway Fire and Rescue Authority. At their Annual Meeting on 15 June 2017, Kent and Medway Fire and Rescue Authority accepted the PCC's request to be appointed as an additional Member of the Authority as soon as it is permitted by legislation. In the meantime, the PCC attends and participates in all meetings on an informal non-voting basis.

It also introduced significant changes to the police complaints system, building on the previous years' reforms. It substantially increases a PCC's role, both in terms of the actual handling of complaints, and also how the CC is held to account for performance in complaints management. For the first time, the Government legislated to give elements of operational complaints

handling to an outside body, in this case PCCs. The main legal requirement is that all PCCs will take over the appellate function currently carried out by force PSDs. Beyond this though, there are two options for other functions of force PSDs to be taken on by OPCCs. Model 2 would see PCCs being the recording body, and also attempt to resolve very low level matters outside of the formal processes; Model 3 would, in addition to this, make PCCs responsible for keeping complainants updated and providing the final outcome.

All PCCs will take on the appellate function and have to increase the level of oversight of complaints handling; the main decision is whether they wish to adopt either Model 2 or 3. Any decision will have an impact in relation to staffing and finance that will increase depending on the extent of a PCC's involvement. Implementation has been delayed, but the PCC has received a business case to inform his decision making.

On 11 December 2017, the Act implemented changes to the police powers and places of safety provisions in the Mental Health Act 1983, including:

- making it unlawful to use a police station as a place of safety for anyone under the age of 18 in any circumstances;
 - allowing a police station to be used as a place of safety for adults only in specific circumstances;
 - reducing the previous maximum detention period of up to 72 hours to 24 hours;
 - requiring a police officer, where practicable, to consult a health professional before exercising a section 136 power.
- In preparation for these changes, Kent Police worked with partners to identify alternative pathways for those in crisis, and the PCC continues to keep the impact under review at his regular meeting.
- c. Continuing devolution of victims services to the PCC. This matter has continued to be delayed at the national level. The Government has indicated, in its letter setting out the grant award

for 18/19, that there will be a Victims' Strategy published, and within that, further consideration of devolution to PCCs. However, this Strategy is not expected imminently.

- d. Transfer of appellate function for complaints from CC to PCC
The implementation date for the transfer of the complaints functions has been put back to 'early 2019', as a result of the complexities of the subject matter and the impact of Brexit. Therefore there has been little movement on this risk in 17-18, and it will be transferred as a risk for 18-19
- e. Improvements to information security
The Force invited the Information PCC's Office to undertake a review of the processes and procedures in Force in order to understand potential weaknesses and for the Force to strengthen the processes. Following the report a substantial improvement plan has been implemented including additional staffing, changes to processes and strengthened procedural controls, and there have been significant updates on this matter to the Audit committee.
- f. Delivery of the 'New Horizons' project
Go-live for New Horizon, a demand led policing model focussing on threat, harm, risk and vulnerability, went live in September 2017. The policing model was designed in full consultation with officer and staff and hence has considerable buy-in from across the force. The initial post implementation review has shown the model to be successful even though demand continues to grow considerably.

Responding effectively to the four partial assurance internal audit reports on

- PCC Assurance over Procurement

The Procurement function has continued to improve, The team is now fully staffed which has enabled them to put in place proper processes for the letting and managing of contracts. The introduction of the Procurement Governance Board provides an

appropriate level of governance and assurance to the CFOs

g. - Control of Information Assets

Dove-tails with the improvements to information security discussed above.

- Creditors

The single site business centre has addressed the weaknesses identified in the audit and reviewed its processes and training of new staff. Many of the issues were around capacity within the team which is now up to strength.

- IT procurement.

Investment has been made in the Procurement function as described above.

- High priority advisory review of Restorative Justice

As part of the assurance programme, the OPCC received one 'no assurance' opinion on the internal audit of the Restorative Justice service. While this was disappointing it was not unexpected and plans were already in place to procure a new RJ provider and relaunch the service from 1st October 2017. This new service, provided by Restorative Solutions, has already made a positive impact with the number of referrals, especially for young people, with proactive work being undertaken to increase referrals for adults. This has involved working closely with Victim Support, Kent Police Witness Care Unit, the Youth Offending Teams and Prisons. Awareness raising is a key part of the new service as it is essential there is a clear understanding of RJ and how to access the service. Awareness amongst the Force was identified as a particular area for development and ensuring that there is a clear and consistent understanding of what RJ is, work has focused on developing links with particular teams and positive action is being undertaken. We currently have monthly contract meetings to monitor service delivery and another audit of the RJ service is planned in the 2018/19 internal audit plan for which we would expect the audit

opinion to improve.

Key risk areas for 18-19

These risks have been identified by the two organisations' CFOs, based on the highest rated risks in the risk registers, and also those which have the broadest impact (which may not necessarily equate to the highest scoring). Some of the highest-rated Force risks are not included, as they are inherent, on-going and relatively stable. This list also includes the internal audit reports where there is partial/no assurance. The work to mitigate these risks will be reported on in the next AGS.

One of the key areas for the Force is to improve crime recording practises, as the Force did not meet the standard the CC expected when inspected by HMICFRS, being rated as 'inadequate'. There was a swift reaction from the Force, to increase the size of the unit, appoint a new lead, and look to recruit new members of staff. In addition, the CC recorded a video, to emphasise to all of Kent Police's officers and staff the importance of this aspect of policing in relation to maintaining public confidence and trust in the organisation.

- Implementation of GDPR, including specifically the risks around commissioning of services
- Implementation of Athena
- Crime recording (both improving the processes and holding the CC to account for this)
- Transfer of complaints/appeal functions
- Ensuring a coherent approach to RJ
- Capacity of current providers to continue with services to victims of sexual violence offences
- Recruitment of additional officers and staff
- The three key Internal Audit reports with no or partial assurance: Leavers and Movers, POCA and firearms.

People and integrity

- **Principles A and E**

The PCC has set out his personal commitment to acting with integrity and to the highest standards in his [Police and Crime Plan](#) (page 4), emphasising that he has signed and published the Committee on Standards in Public Life checklist and also his personal [Code of Conduct](#) which reflects the Seven Principles in Public Life. He is clear that he will hold the CC to account for the [Code of Ethics](#) forming the bedrock of standards and behaviour within Kent Police.

The CC personally chairs the Force Culture Board, a clear demonstration of how much the force values integrity. At the CC's direction all directorates have their own culture boards all contributing to the force's outstanding HMIC assessment on Legitimacy.

Both organisations maintain an up to date [gifts and hospitality register](#), and a record of [Chief Officers' and PCC's expenses](#), all of which are publically available. Following the audit, both organisations have enhanced their policies around gifts and hospitality in line with the recommendations, and these registers are now reported to the JAC annually. The OPCC website has been remapped so that transparency documents are now located on the webpages they relate to, making them easier to find.

Both organisations have up to date [policies](#) on complaints and whistleblowing, and handle all complaints and FOI requests as required by legislation and external organisations such as the [Information Commissioner's Office \(ICO\)](#) and the newly renamed and re-organised [Independent Office for Police Conduct \(formerly the IPCC\) \(IOPC\)](#). There is a mutual commitment to transparency, and the OPCC has a section on its website to reflect this, and ensures compliance with the [Specified Information Order](#) requirements.

Both the Force and the PCC's Office aim to attract, develop and support the best people, and to be employers of choice. There is a commitment to

flexible working which is developing, whilst taking into account the organisations' specific needs. There is a strong commitment to the development of staff at all levels in both organisations, with staff being encouraged to gain further qualifications and experience through in house and external providers, and by mentoring. There are a number of overarching strategies in place that outline this, and are supported by policies and processes which both organisations adhere to¹ as well as new initiatives such as 'Develop You' and the Ideas Drop.

The Force's Control Strategy is clear that the service to residents in Kent will be delivered professionally and above all ethically. The culture for the Force is set by the leadership and is supported by the Culture Board and the Internal Ethics Committee, which meet quarterly and have a set quorum of members plus additional inclusive representation from across the organisation. The Force was again graded as 'outstanding' by HMICFS for legitimacy, for the third year in a row, and is the only Force to currently hold this grading.

There is a revamped 'Diversity and Inclusion' Board held by the Force, with attendance from the OPCC, and a related Diversity and Inclusion Strategy which is owned at Assistant CC level.

The key areas for development will be the embedding of the new Diversity and Inclusion Strategy, and the work of the Board in reviewing this, and Kent Police's work to recruit and retain a greater number of people from BAME backgrounds.

Medium term plan and value for money

- **Principle D**

There is a comprehensive framework and process to support the organisations achieving the required outcomes via the [Medium Term](#)

[Financial Plan](#); this sets the context for the on-going decisions over the life of the Police and Crime Plan.

The MTFP is updated regularly to reflect the changes in the social, governmental and financial environment, and any significant changes are reported to the Chief Officer Team and JAC each quarter.

[The Police and Crime Plan](#), budget and MTFP are reported as a joint paper to the [Police and Crime Panel](#), reflecting the need for them to be developed together, and there is a financial planning timetable and process that ensures they are integrated.

The communication between the CFOs, Chief Officers and PCC is at the heart of this process, and the regular meetings assist in determining the information needs which in turn inform the decision making. This cascades further to internal departments and partner agencies (covered in detail further on in the AGS), with clear guidance and protocols issued for day to day business and a defined process for business cases for future service delivery which encapsulates impact, benefits realisation and effective appraisals.

VfM is a key element of the [Safer in Kent Plan](#); it underpins everything the Force and PCC do, and is embedded within the two organisations and [financial regulations](#). The external view on VfM is provided by the External Auditors, who state that there are adequate arrangements in place, and by HMICFRS, who view the Force as 'good' with 'outstanding' features. The Force make extensive use of the HMICFRS VfM profiles to determine performance against their most similar Forces, which helps identify areas of potential strength and weakness, and is reported to the JAC.

A procurement Governance Board has been established to provide both CFOs with a clear view of procurement issues; this was in response to the audit into assurance over procurement, which could only provide partial assurances. This Board will ensure better planning, shared procurement opportunities and helps drive VfM through improved procurement, locally, regionally and nationally, and will monitor the issues raised in the audit.

To enhance these arrangements there is scope to improve the linkages between financial and planning documents, and for further scrutiny and review of the [Financial Regulations](#). The Financial Regulations are maintained between the Force and PCC's CFOs and reviewed annually. These are shared with budget holders and managers to ensure best practice and follow the schemes of consent outlined above

A new Financial Management Code of Practice is due to be published in 2018/19 and while little change is expected any amendments required by the new code will implemented during the year.

Working with partners, and commissioning

- **Principles A-G**

Vision

Within the PCC's [Police & Crime Plan](#) he has made a commitment to collaborate with other organisations to tackle crime and community issues more effectively, particularly focusing on improved communication, making better use of limited resources and greater sharing of skills and expertise. This commitment is reflected in the commissioning approach of the PCC, as working with partners to reduce crime, anti-social behaviour and to support victims is vital.

The PCC supports both statutory partners, charities, voluntary and community groups through either grants, funding opportunities or formally commissioned services to ensure that collaborative working can be undertaken to reduce crime, anti-social behaviour and support victims.

There is an overarching [Commissioning Strategy](#), which is publically available, which sets out the PCC's approach. It is currently being revised for the new financial year, specifically focussing on grant monitoring processes and grant-giving conditions. This document forms part of the [Police and Crime Plan](#) and clearly sets out the governance processes for funding so that there is transparency in decision making and oversight of

the outcomes achieved. In addition, details of the timelines for all funding streams, including when they open, when decisions will be made and when monitoring is due are included. This ensures that there are clear expectations from the outset and that resources can be managed accordingly. Whilst commissioning and partnerships are naturally aligned it is not necessary to always link working with partners with the provision of funding. The PCC actively engages with a range of partners to support delivery of the [Police & Crime Plan](#) priorities. This can be demonstrated through the engagement with a wide variety of partnership groups and activities, such as CSPs, which enables opportunities for collaborative working to identified and progressed.

MTFP/VFM

The PCC's website includes details of [organisations funded, the project being delivered and the amount of funding received](#).

[The Police and Crime Plan](#) clearly sets out the financial arrangements and medium term budget for partners and commissioning. The Office follows all procurement guidelines as set out in the Financial Regs, and the OJEU processes for the tendering of services where the threshold is reached. The [Commissioning Strategy](#) provides guidance on whether services should be commissioned or follow a grant process, and the best procurement route for services.

There are proportionate monitoring processes in place for all funding organisations, which includes the collation of returns into yearly reports, and there will be increased monitoring of how funds are spent, with greater expectations on partners this year. This ensures that the PCC's funds are being spent effectively and that the appropriate outcomes are being achieved. The Office is developing clear links to the Force to ensure that work with all our partners is interlinked and complementary.

Transparent communication, Engagement and Accountability

The Office is accountable to the MoJ for the Victims' Services grant and provides grant monitoring forms twice yearly, outlining what has been achieved.

Consultation exercises have been undertaken on grant funding processes and larger commissioning exercises, such as Restorative Justice, where appropriate. In compliance with the MoJ Grant Agreement, the Support Services that have been commissioned or provided with the Grant, including referral services, are also specified in the [Annual Report](#).

As well as the transparency in funding, via the website and the [Safer in Kent Plan](#), there has been extensive engagement with partners, especially with organisations in receipt of funding (such as Community Safety Partnerships) to ensure sharing of good practice and to identify opportunities for collaboration. The OPCC will hold partners to account in greater depth, ensuring that the schemes funded support the aims of the Police and Crime Plan. There is also work to progress co-commissioning arrangements where appropriate, and utilising grant criteria to encourage cross district border projects.

Decision making and risk management

There has been [one internal audit](#) in this area, focussing on the broader commissioning project, which stated that the OPCC could take reasonable assurance in this area, and was positive about the work of the OPCC. It has been reviewed by the [Audit Committee](#), and in addition the Head of Department has presented to the JAC. There is also a specific risk register for the core victims' services contract.

The forms that support the PCC's commissioning are clear, with specific criteria, and all funding decisions are taken with clear reference to the [Safer in Kent Plan](#), and how the project will support its objectives.

Decision making is carried out using a scoring matrix which correlates to the bid criteria and demonstrates the links to the [Safer in Kent Plan](#) priorities.

People and Integrity

There has been extensive, tailored and on-going engagement with partners at all levels to ensure they not only understand the role of the PCC in commissioning, but how they can best engage with the Office and access the funding on offer.

The PCC also supports a Victims' Panel, as an independent group who can offer qualitative information and personal insight on service design and delivery.

Essex

Essex Police have been the Force's collaboration partner for a number of years. The Serious Crime Directorate provides intelligence and support to target and tackle anyone involved in serious criminality. The Directorate is one of the largest in UK policing dedicated to tackling serious and organised crime, with more than 1,100 officers and staff working together across both counties. The Support Services Directorate provides specialist services to Kent and Essex Police including Transport, Estates, Procurement, HR, transactional processing and IT.

The vision is to work with Essex police to reduce costs whilst increasing capability for both forces through the delivery of a first class service and achieving economies of scale.

Both directorates report to the Kent and Essex Collaboration Board. The Serious Crime Directorate is led by an ACC and is accountable to both

CCs. Support Services is led by the Director who also reports to the two Chiefs.

Joint audits are commissioned to assist with the governance of the collaborative directorates with reports going to both force CFOs, the two Offices of the PCC and both JACs.

Recharges of costs are maintained and undertaken between Finance Departments for both Forces against detailed budgets which are constructed in line with the Section 22 agreements governing the collaboration agreements. These costs and budgets form part of the overall financial position of the force and therefore are reported monthly to the Chief Officer Team and OPCC.

Opinion of the Internal Auditors

The following is the opinion of RSM:

For both the Office of the PCC, and for Kent Police, the Internal Auditors agreed and concluded that:

For both Kent Police and the Kent Police and Crime Commissioner's Office, the organisation has an adequate and effective framework for risk management, governance and internal control. However, our work has identified further enhancements to the framework of risk management, governance and internal control to ensure that it remains adequate and effective.

In their [Annual Report](#), it was noted that there were four partial or no assurance reports (Leavers and Movers; Proceeds of Crime Act and Seized Monies- Cash, Property and Drugs; Firearms Storage and disposal, and Taser stock control; and Risk Management (Force) that identified a number of issues that management needed to address as a high priority, with the exception of the Risk Management audit which was related to structure and process and has already been addressed. Both organisations have agreed actions to address these findings which are regularly monitored by senior management and the JAC.

The report on POCA was of particular concern, and has been subject to greater internal scrutiny. The implementation of the recommendations is well underway and is being led by the ACC for the Serious Crime Directorate.

They have also been included in the 'key risk areas' for 18-19. The outcomes will be summarised in next year's AGS.

Statement on the effectiveness of the current governance framework and action plan summary

The PCC and the CC have a shared responsibility to ensure an annual review of the overall effectiveness of the governance system. The review is informed by the work of the internal auditors and key managers within the

OPCC and the CC team (with collaboration benefits from sharing the same external and internal auditors with Essex). It is also informed by the comments of external agencies as they apply to Governance.

The view of the PCC, supported by his statutory officers and the CC supported by his Chief Officers is that overall the effectiveness of governance, risk management and controls remain generally sound. A number of actions are listed above as required to enhance the control environment, and are collated into an action plan below.

Action Plan for 18-19

The below details (in order of appearance in the AGS, as opposed to ranking by importance) the areas for improving governance for both organisations in 18-19.

- Continuing to improve the Kent Police's website functionality, including live chat, improved recruitment services and ways to gauge opinion
- The embedding of the new Diversity and Inclusion Strategy; the work of the Board in reviewing this, and Kent Police's work to recruit and retain a greater number of people from BAME backgrounds.
- Increase the governance around partnership funding, specifically improving the monitoring of how funds are committed by partner agencies
- Develop the 'hold to account' function in respect of partner agencies, ensuring that their schemes support the aims of the Police and Crime Plan.
- Ensuring the reporting by the Force to the P&D Board demonstrates the linkages with the Police and Crime Plan and how the Force is producing demonstrable outcomes.
- Develop and enhance the governance of the multi-agency approach to mental health, through the Board, to deliver improved and joined up services

- Explore opportunities to collaborate with KFRS
- Improvements to information security, via the action plan implemented, to be embedded and monitored.
- Review the impact of the Treasury Management Code of Practice and implement any relevant changes to strategies.

Appendix A

Response to the previous year's action plan

Develop the approach, processes and evaluation system in relation to holding the CC to account, and to ensure that the public can see benefit and successes of the PCC's work, and ensuring VfM.

The first of the [Performance & Delivery Board](#) meetings (formerly the Governance Board) was held in June 2017, and this Board has strengthened the PCC's process for holding the CC to account. With an agenda consisting of Force Performance, Police and Crime Plan Delivery, Finance, People and Collaboration, as well as a re-invigorated OPCC pre-meet process, it has enabled the PCC to effectively monitor delivery against the [Police and Crime Plan](#), as well as the totality of policing in the county. The pre-meet process also helps the PCC to challenge, through the use of probing questions, and show support where appropriate. It is anticipated that the changes to the agenda being introduced from March 2018 will serve to strengthen the process for holding the CC to account further.

To support development of the [Annual Report](#), the Head of Policy Coordination and Research regularly captures information from SMT colleagues on progress against each of the priorities within the [Police and Crime Plan](#). Each member of the SMT has also been allocated specific policy areas linked to the Plan that the PCC has determined he would like to deliver during his term of office. In this way, the activity of the OPCC is focused on delivery of the PCC's priorities and specific activities are linked to tangible outcomes.

Refining the OPCC website, to ensure that it is user friendly and assists in effectively directing members of the public to the area that they need.

The new OPCC website went live on 1st March 2017. It features an improved 'search' function to aid the public, and has been awarded the CoPaCC OPCC Transparency Quality Mark for 2017/18.

Further work on how best to effectively identify decisions that will require formal management.

The following principles underpin the PCC's formal decision-making approach:

- Transparency - unless there are reasons for confidentiality, consistent with legislation, decisions and the supporting reasons should be publicly available
- Openness – subject to confidentiality, the most important decisions should be taken in a public forum and should be the subject of public engagement and consultation
- Proportionality – the administrative process should be proportionate to the nature of the decision being taken
- Timeliness – the process should enable timely decisions to be made
- Auditable – there should be evidence to demonstrate, if necessary, how the decision was made and what advice was taken
- Engagement and consultation – formal decisions will be made, wherever possible, following engagement with local people and other stakeholders to ensure robust public accountability.

The identification of formal decisions has been raised at SMT level by the Chief Executive. As part of business as usual, the Head of Policy Coordination & Research captures potential decisions as and when they arise, and meets regularly with the PCC and Chief Executive to discuss those that will formally be recorded. A standard template is used to record all formal decisions so they can be uploaded to the website for transparency purposes and regularly submitted to the PCP for review.

Kent Police to develop their approach to business cases, demonstrating consideration of risk

Through the Support Services Directorate two Business Case Masterclasses have been run based around the Treasury's Five Case model. These masterclasses were well attended and well received and included inputs from both Force and PCC CFOs as well as from PA Consulting.

Emphasis was placed around the identification of which risk(s) are being addressed through the business case (including reference to the Force Risk Register) as well as on the accuracy and completeness of all costs and a full description of the benefits of the case.

The main departments initiating business cases were included within the masterclasses so the majority of project and programme managers received the same input with a consequential increase in quality and uniformity of business cases thereafter.

Develop financial performance information, including taking the Treasury Management Strategy to the JAC for scrutiny.

More detailed financial information is provided on a monthly basis to both CFOs. This is shared with Chief Officer teams. The treasury management strategy has been shared with the JAC and will be reported on an annual basis. The JAC will also receive reports on the performance of the strategy on a regular basis.

Both organisations to improve their policies around gifts and hospitality.

Both organisations have enhanced their policies around gifts and hospitality in line with the recommendations, and these registers are now reported to the JAC annually.

Ensure the transparency section on the OPCC website is updated and in compliance with the legislation when the new website is established

The OPCC website has been remapped so that transparency documents are now located on the webpages they relate to, making them easier to find.

Both organisations to review their approach to Equality and Diversity, specifically how the Force's Board operates and how the PCC holds the CC to account.

There is a new Diversity and Inclusion Strategy, and related Board, which the Force holds and the OPCC attends. Staff from the PCC's Office also sit on the Force's Hate Crime Forum and the Stop and Search Scrutiny Panel. Independent members from the ICV and IPAG schemes also review the Force's Stop and Search encounters.

Improve the linkages between financial and planning documents

There is a greater understanding of the [Medium Term Financial Plan](#) amongst the Chief Officer Team and wider Force management tiers than has previously been the case. The links between Home Office Grant, Precept, base budget, demand, inflation and savings are now present in discussions around the thinking and proposals for new policing models and demand management.

The Force CFO and Finance Senior Leadership Team work alongside the Force Change Team to ensure costs and benefits are well understood, accurate and articulated in the development of the new policing model.

Ensure further scrutiny and review of the [Financial Regulations](#).

[The Financial Regulations](#) have been revised and updated by the PCC's and Force CFOs and include version control, review dates and the date the next review is due. This document will doubtless continue to evolve and will be shared with Finance colleagues and budget managers as changes arise.

Review the [Commissioning Strategy](#) for 17-18 onwards

This is currently taking place and is linked to the findings of an internal audit into grant processes during the autumn of 2017. The revised [Commissioning Strategy](#) will be publically available and clearly set out the parameters for issuing and monitoring all funding issued, whether grant, formally commissioned or a funding round.

Refresh the grant awards process to ensure that it reflects the revised [Commissioning Strategy](#)

This is currently taking place and linked to the findings of an internal audit into grant processes during the autumn of 2017. In addition, learning from the grant processes during 17-18 has helped to inform further improvements to processes for 18-19.

Consider new ways to improve oversight of and outcome reporting from funded organisations

A key theme for the funding processes is ensuring that funded organisations report effectively on outcomes and that there is a clear governance and oversight process for delivery. Grant conditions and monitoring processes are being strengthened as a result.

Ensure consistent funding application process for OPCC and Force.

The [Commissioning Strategy](#) for 18-19 will clearly reflect the funding application processes to ensure consistency of approach, which will also support the review and collation of information so effective oversight can be maintained.

Matthew Scott

Police and Crime Commissioner for Kent

30th April 2018

Alan Pughsley QPM

Chief Constable for Kent

30th April 2018

