



**MINUTES OF THE JOINT INDEPENDENT AUDIT and ETHICS COMMITTEE  
(POLICE AND CRIME COMMISSIONER FOR WEST YORKSHIRE  
AND WEST YORKSHIRE POLICE)  
HELD ON 12 OCTOBER 2018**

**AUDIT SESSION**

**MEMBERS PRESENT**

Richard Baldwin  
Harry Bower  
Trevor Lake (Chair)  
Ann Liston

**OFFICERS PRESENT**

Emma Aldred, Inspector, WYP (for items 1 – 8 inclusive)  
Corinne Braund, Grant Thornton  
Nigel Brook, ACO Business Operations, WYP  
Joanne Campbell, Audit Manager, Shared Services  
Paul D Grady, Grant Thornton  
Katherine Johnson, Treasurer, OPCC  
Beverley Nichol-Culff, Head of Risk Management and Insurance, WYP  
Julie Reid, Governance Manager, OPCC  
Neil Rickwood, Head of Audit & Risk, Shared Services  
Wilma Wu, Grant Thornton

**1. WELCOME & APOLOGIES**

The Chair opened the meeting and welcomed colleagues from Grant Thornton and Inspector Emma Aldred.

No apologies were received.

**2. DECLARATIONS OF INTEREST**

No interests were declared.

**3. RECORD OF ATTENDANCE**

Details of member and officer attendance at previous meetings of the Committee were circulated for information and agreed.

#### 4. MINUTES

The minutes of the meeting held on 20 July 2018 were agreed as a correct record.

#### 5. MATTERS ARISING

##### **Item 21.1 – OPCC staffing review and business case**

Members noted the letter from the Prison Service, Richard Baldwin observing that the brief letter was unhelpful but, nevertheless, discharged the Committee's responsibility.

##### **Item 21.5 – Business update**

Members considered the report on the OPCC risk assessment and governance arrangements associated with the appointment of PCC to chair of the APCC and the absence of the Deputy PCC and substantive Chief Executive and Legal Adviser.

Ann Liston queried whether this would be reviewed in light of the Chief Constable's secondment to the College of Policing and was informed that the Deputy Chief Constable, John Robins, would become Acting Chief Constable for this three-month period.

##### **Item 21.7 – Risk Register**

Members received an update report on the missing person's research collaboration and were informed by Nigel Brook that this mutually beneficial agreement was on a no-fee basis and was intended to contribute to increasing collaboration with the N8 universities (the eight most research intensive universities in the North).

##### **Item 21.9 – Internal Audit Report**

Members received a report on Force compliance with the Working Time Directive; Nigel Brook confirming that quarterly reports are presented to the Chief Officer Team and the Police Federation are also sighted on the issue.

Trevor Lake noted that the report gave assurance but requested an exception report in six months' time from the People Director in view of the strategic and local risks associated with HR, which had been noted on the risk register.

**ACTION: The People Director to report to Committee in April 2019 to provide a statistical exception report on compliance with the Working Time Directive.**

##### **Item 21.10 – Treasury Management Strategy**

Members received a report on the institutions with which investments are placed.

Richard Baldwin noted that all were local authorities and was advised by Katherine Johnson that, now, local authorities have better ratings than banking institutions.

## 6. CHAIR'S UPDATE

Trevor Lake noted that this meeting was the last one for the three independent members whose terms of office were due to end on 31<sup>st</sup> December. Trevor thanked the members on behalf of the Committee and the Office of the Police and Crime Commissioner and Police Authority Standards Committee.

Nigel Brook and Katherine Johnson thanked the members on behalf of the Chief Constable and Police and Crime Commissioner respectively.

Trevor Lake noted that arrangements are in place to recruit three new independent members.

Trevor Lake reported that he had attended a Police and Crime Panel meeting in October to provide his annual report on the work of the Committee, which had sought assurance on the work of Internal Audit and had requested to see a copy of the Board Assurance Framework. Trevor had agreed to share this and noted the hard work that Neil Rickwood and others had done to establish it.

**Action: Julie Reid to forward an up to date copy of the Board Assurance Framework to Police and Crime Panel.**

## 7. BUSINESS UPDATES

### OPCC

Katherine Johnson noted that members had received the Police and Crime Plan Priority Plan and stated that the delivery plan was now in place across the remit of the three specialist adviser posts. Members requested this to be reported to a future meeting.

**ACTION: Katherine Johnson to provide members with the delivery plan at the January 2019 meeting.**

Katherine Johnson noted that the commissioning strategy had been approved and would be shared with members.

**ACTION: Katherine Johnson to provide members with the commissioning strategy.**

Katherine Johnson provided members with further updates, stating that a restorative justice service had been launched with a three-year contract for West Yorkshire wide coverage. Members were also informed that victims services is now operated on a commissioned service basis rather than through grant funding. Members were also advised that the business review of PNLD was complete.

### WEST YORKSHIRE POLICE

Nigel Brook provided members with a report on the Force monthly performance.

Members were informed of a predicted overspend on the Medium Term Financial Forecast (presently identified as £3.9m by the year-end) which required reductions in recruitment to

resolve in the short-term. Government predictions of lower economic growth in the light of Brexit have led to reduced government funding for police pensions, which, along with a reduction in employee contribution rates is likely to result in a £9.5m shortfall by 2019/20. Members were advised that discussions are presently taking place between the police service and the Government regarding the impact of these changes.

Nigel Brook informed members that the Chief Constable has been seconded to the College of Policing for a three-month period to lead the Senior Command Course. In the meantime, John Robins will act as Chief Constable, Russ Foster will act as Deputy Chief Constable and Mark Ridley will act as Assistant Chief Constable.

Ann Liston raised a concern about the cumulative impact of the absences. Katherine Johnson reassured members that the Police and Crime Commissioner is still covering all West Yorkshire matters whilst he is Chair of the APCC which, coupled with the experience of John Robins, is not expected to result in a detriment.

Ann Liston queried the impact of the absence of the Deputy Police and Crime Commissioner and was advised by Katherine Johnson that the Deputy's role was revised following the organisational review such that the role no longer chairs some working groups or line manages staff but focusses more on political advice for the PCC.

Richard Baldwin noted the budget position at the time of increasing demand and rising recorded crime. This concern was shared by Trevor Lake.

Richard Baldwin queried how far recorded crime matched the British Crime Survey reports. Nigel Brook advised members that the British Crime Survey had reported a consistent level of crime and crime recorded by West Yorkshire had risen to a similar level thus reducing the gap.

## **8. IMPLEMENTATION OF AUDIT RECOMMENDATIONS RELATING TO DATA QUALITY.**

Inspector Emma Aldred provided members with an update on a report, which was received by the Committee in January 2018 and outlined existing work towards the development of a Force strategy for data quality.

Members were informed that the initial data quality plan focussed on duplicate nominals, missing persons and address data quality. Further work has been done with the Data Barring Service and the Police National Computer so that duplicates or inaccuracies are corrected by the staff in these teams directly which has also led to cost savings. Members were also informed that the introduction of a new Niche missing persons module had been an opportunity to begin the cultural change towards becoming a data driven organisation.

Emma Aldred explained the potential use of analytics to validate and cleanse large volume data and informed members of a plan to move to a single 'Ingest' system, which will be risk based and able to identify vulnerability quicker. Work is underway with Digital Policing to procure this.

Trevor Lake requested an update in six months' time.

**ACTION: Emma Aldred to provide an update report to the April 2019 Committee on data quality work.**

Emma Aldred left the meeting.

## **9. FREEDOM OF INFORMATION / GDPR UPDATE**

Nigel Brook provided members with an update of the Force's compliance with the Freedom of Information Act (FOI) and the General Data Protection Regulation (GDPR), noting that vacancies in the FOI team had put pressure on the Department which deals with a high volume of requests.

Reasonable assurance had been achieved following an audit by the Information Commissioner's Office on compliance with GDPR and the recommendations arising from this were being implemented.

Members accepted the report.

## **10. RISK MANAGEMENT UPDATES**

### **OPCC**

Beverley Nichol-Culff presented the OPCC strategic risk profile, which had been agreed on 30 July 2018, noting ten new risks and two closed risks.

Members discussed the OPCC NPAS related risk. Katherine Johnson advised that a governance review is planned (in addition to the audit conducted by HMICFRS) and that the volume and complexity of this area of work places a significant burden on the OPCC.

Members agreed that if the OPCC workload is in excess of that originally agreed then they should consider recouping more than the present level of recharge (10%) from the NPAS budget.

Members were concerned about the impact of NPAS on the OPCC and the Force and Trevor Lake requested the NPAS risk register be included in regular risk management updates to Committee.

**ACTION: Beverley Nichol-Culff to include the NPAS risk register in regular reports to the Committee.**

### **WEST YORKSHIRE POLICE**

Beverley Nichol-Culff presented the West Yorkshire strategic risk profile, which had been agreed on 30 July 2018, noting ten new risks and seven red risks.

Richard Baldwin queried the risk relating to the custody suites in Leeds and Wakefield District and asked whether the Force would be recompensed. Nigel Brook explained that the operational risk was being managed by the use of extra sites and that the PFI agreement allowed financial penalties to be imposed by the Force.

## 11. INTERNAL AUDIT PROGRESS REPORT

Joanne Campbell outlined the Internal Audit progress report and brought members' attention to two reports which gave limited assurance, a review of PREVENT and a review of Business Interests.

Neil Rickwood explained that limited assurance was reported in connection with the PREVENT programme because of a lack of knowledge and understanding of the programme in District.

Richard Baldwin noted that PREVENT is often seen as a counter-terrorism strategy rather than a wider vulnerability and safeguarding programme and suggested that Internal Audit recommendations should also emphasise the importance of working with partners.

Neil Rickwood reported on the limited assurance gained from the Business Interests review, which resulted from poor data quality on the Centurion system. Trevor Lake noted the risk relating to the planned organisational review of the People Directorate and requested the proposed organisational structure once staff consultation closes.

**ACTION: Nigel Brook to provide the proposed People Directorate structure once staff consultation closes.**

Trevor Lake noted that that 60% of the recommendations arising from the missing persons audit are still ongoing and sought an update at the next meeting of the Committee.

**ACTION: Neil Rickwood to report on progress in implementing the recommendations relating to the missing persons audit at the next Committee meeting in January 2019.**

Neil Rickwood informed the meeting that the level of limited assurance reporting had remained consistent over a number of years.

Trevor Lake noted the report, PSD Healthcheck – Abuse of Position for Sexual Gain, and was advised that Internal Audit are reviewing this area of work in view of the level of risk associated with it.

## 12. EXTERNAL AUDIT REPORT

Paul D Grady outlined the first external audit report from Grant Thornton, advising members that the report sets out the workplan for the next twelve months and Grant Thornton have liaised with KPMG regarding the work they undertook previously. Members were informed that the company works across the public sector and offers a regional public sector audit forum.

### **13. COMMITTEE SELF-ASSESSMENT**

Members discussed the Committee self-assessment returns and noted the importance of training and induction for new members (including Freedom of Information training and risk management familiarisation). Trevor Lake requested an annual standing item for the Chief Constable and Police and Crime Commissioner's attendance.

**ACTION: Julie Reid to schedule an annual visit to the Committee by the Chief Constable and Police and Crime Commissioner.**

Members welcomed Nigel Brook's suggestion that the Committee should take place at other premises with presentations from the host district.

**ACTION: Julie Reid to schedule meetings at other premises to facilitate district presentations.**

### **14. ANY OTHER BUSINESS**

None.

**Next meeting: 10:00, 4 January 2019, Ploughland House.**