



west midlands
police and crime
commissioner



AGENDA ITEM 08

**JOINT AUDIT COMMITTEE
24 June 2021**

ANNUAL GOVERNANCE STATEMENTS

1. PURPOSE OF REPORT

- 1.1 To inform Members of the requirement to produce & publish an Annual Governance Statement on Corporate Governance along with the assurance processes and protocols that are associated with this production.

2. BACKGROUND

- 2.1 Good governance has been a growing area of focus since the early 1990's and various good practice documents have been produced and improved as reform has taken place and governance has played an increasingly important role in the public services.
- 2.2 The Accounts and Audit Regulations 2015 (amended 2021) require that all principal authorities produce a statement on governance, having carried out a review of internal controls, at least annually. This requirement now takes the form of an Annual Governance Statement (AGS), which accompanies the Statutory Accounts. CIPFA's Better Governance Forum also produced a document highlighted the matters that should be considered as a result of the coronavirus pandemic on Annual Governance Statements.
- 2.3 The Commissioner and Chief Constable are respectively the responsible corporate bodies for the production of the AGS.
- 2.4 Attached to this report, at **Appendix A**, are the draft Annual Governance Statements for 2020/21. The Statements have been prepared in line with the framework produced by CIPFA and Solace in 2016 'Delivering Good Governance.' This includes CIPFA's Guidance Notes for Policing Bodies in England and Wales and the Better Governance Forum's document referred to above. Both statements will be published in the draft 2020/21 draft statements of accounts for both organisations.

3. PROCESS

3.1 The PCC's Chief Finance Officer and the Chief Constable's Head of Financial Accounting & Tax completed an assessment based on CIPFA's 'Delivering Good Governance' guidance notes. This including assessing both corporations governance arrangements against the core principles of the 'Delivering Good Governance' framework. The core principles are as follows:-

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- Ensuring openness and comprehensive stakeholder engagement
- Defining outcomes in terms of sustainable economic, social and environmental benefits
- Determining the interventions necessary to optimise the achievement of the intended outcomes
- Developing the entity's capacity, including the capability of its leadership and the individuals within it
- Managing risks and performance through robust internal control and strong public financial management
- Implementing good practices in transparency, reporting and audit to deliver effective accountability

3.2 To aid with the above assessment the schedule in Appendix B was produced. This assessment assisted in providing assurance around the governance framework of the organisations. This was through demonstrating how the PCC and Chief Constable meet the expected behaviours from the Delivery of Good Governance.

3.3 In addition to the above assessment senior managers from the Commissioner's office and the Force, reviewed the draft Annual Governance Statements attached to this report to ensure they reflect the governance arrangements of the organisations. This includes the effectiveness of the arrangements and identifying any significant issues that need to be addressed. These are reported upon in the attached statements and actions will be put in place to address any issues during the year.

4. RECOMMENDATIONS

4.1 The Committee is asked to consider and note the contents of this report.

4.2 The Committee is asked to consider the Annual Governance Statements for 2020/21, as attached at **Appendix A**.

Mark Kenyon
Chief Finance Officer
Police and Crime Commissioner

Neil Chamberlain
Director of Commercial Services
West Midlands Police

Appendix A (1)

**Police and Crime Commissioner West Midlands
Annual Governance Statement**

Position as at 31st March 2021 including plans for the financial year 2021/22



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1 Introduction

This Annual Governance Statement demonstrates how the Police and Crime Commissioner for the West Midlands complies with a governance framework. This includes how the effectiveness of the framework is evaluated and monitored. This document also highlights any significant governance issues and any planned changes in the governance framework.

The Police and Crime Commissioner (PCC) elections took place on 6 May 2021 and a new PCC was elected. This will mean that the governance arrangements detailed in this document may be revised during 2021/22.

A major development on the operation of the Police and Crime Commissioner's business has been the outbreak of COVID-19 which has had a significant impact on West Midlands Police. This statement refers to how the outbreak of COVID-19 has been managed and governed from a policing perspective.

2 Scope of Responsibilities

The Commissioner is responsible for ensuring his business is conducted in accordance with the law and proper standards, and public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The Commissioner also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which his functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

In discharging this overall responsibility, the Commissioner is also responsible for putting in place proper arrangements for the governance of his affairs and facilitating the exercise of his functions, which includes ensuring a sound system of internal control is maintained through the year and arrangements are in place for the management of risk.

The Commissioner has adopted a Code of Corporate Governance, consistent with the principles of the CIPFA/SOLACE 2016 updated framework: *Delivering Good Governance in Local Government*, a copy of which is on the Commissioner's website at www.westmidlands-pcc.gov.uk or can be obtained by contacting the Commissioner's office, details at <https://www.westmidlands-pcc.gov.uk/contact>. This statement explains how the Commissioner has complied with the Code and also meets the requirements of the Accounts and Audit Regulations 2015 (amended 2020), regulation 6(1), which requires all relevant bodies to prepare an annual governance statement.

3 The Purpose of the Governance Framework

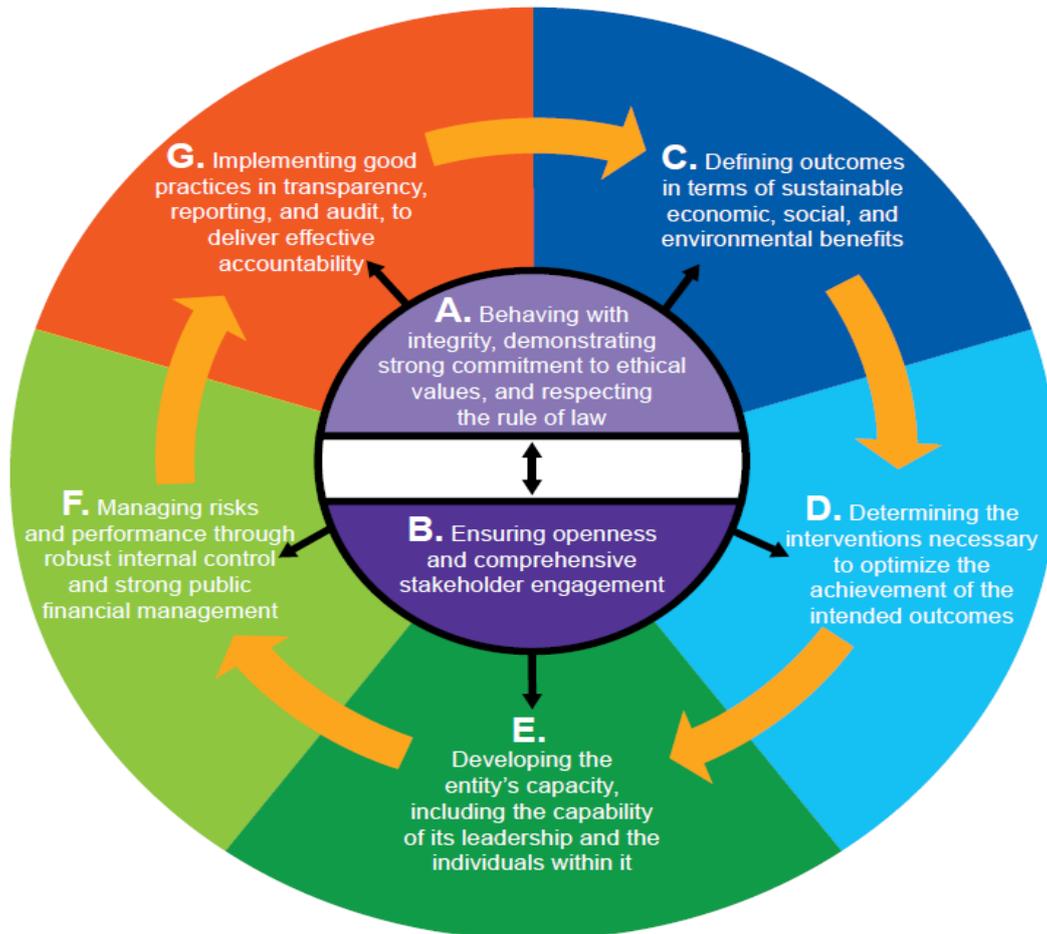
The governance framework comprises the systems and processes, and the culture and values by which the Commissioner directs and controls his activities through which he accounts to and engages with the community. It enables the Commissioner to monitor the achievement of his



strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services, including achieving value for money.

The system of internal control is a significant part of the framework and is designed to manage risk to a reasonable and foreseeable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives; it can therefore only provide reasonable but not absolute assurance of effectiveness. The system of internal control is based on an on-going process designed to identify and prioritise the risks to the achievement of the Commissioner's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them effectively, efficiently and economically.

The diagram below sets out the core principles of the Police and Crime Commissioner's Governance Framework.



4 The Governance Framework

Although the Chief Constable is responsible for operational policing matters, the direction and control of police personnel, and for putting in place proper arrangements for the governance of the Force, the Commissioner is required to hold him to account for the exercise of those functions and those of the persons under his direction and control. The relationship between the Commissioner, the Chief Constable, the Police and Crime Panel and the Home Secretary is guided by the [Policing Protocol Order 2011](#).

It therefore follows that the Commissioner must satisfy himself that the Chief Constable has appropriate mechanisms in place for the maintenance of good governance. For these to operate in practice, the Commissioner and the Chief Constable, as separate corporations sole, have separate but complimentary governance structures. These facilitate the achievement of effective governance arrangements, including the monitoring and assessment of performance in line with statutory responsibilities.

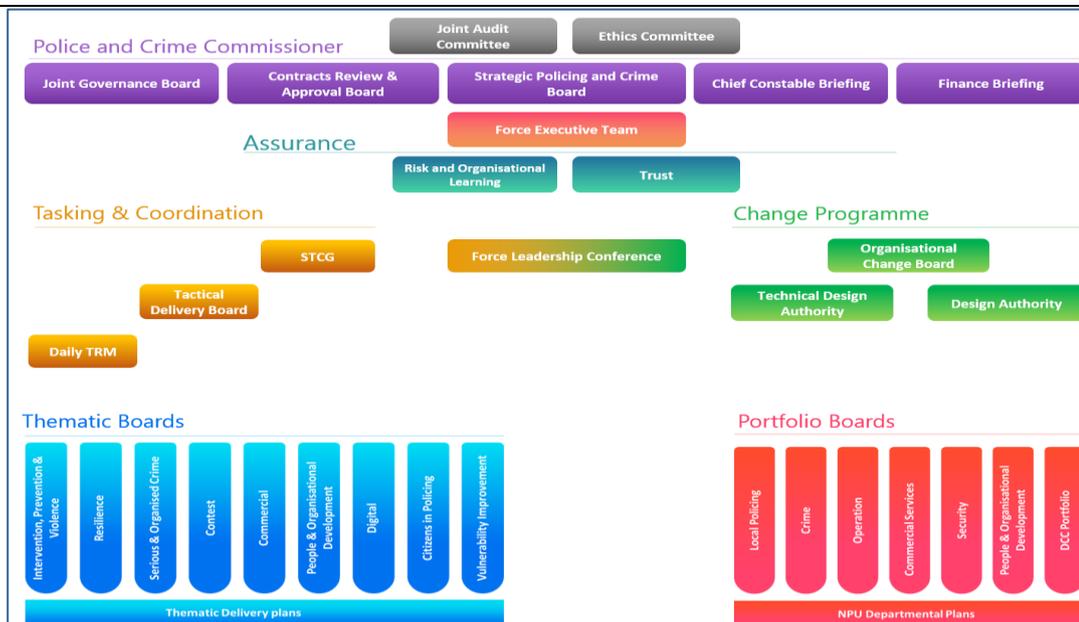
The Commissioner adopted a number of systems and processes to operate the governance arrangements, the key elements of which are detailed below:

- The West Midlands Police and Crime Plan 2016 – 2020 set out the previous Commissioner's objectives for policing and community safety, the policing to be provided, the financial and other resources that will be available, how performance will be measured, what grants will be made and how the Chief Constable will be held to account. Due to COVID-19 the Police and Crime Plan was amended in April 2020 and included an emergency chapter covering the COVID-19 crisis. Also the postponement of the Police and Crime Commissioner elections in May 2020 to May 2021, meant the Police and Crime Plan 2016 - 2020, including the emergency chapter were in place to the end of the previous Commissioner's term of office in May 2021. A new Police and Crime Plan will be developed setting out the current Commissioner's objectives.
- Translating the Commissioner's objectives into delivery plans.
- The operation of the Strategic Policing and Crime Board (SPCB) that assisted in holding to account West Midlands Police. The SPCB meets monthly in public. The meetings are webcast and have taken place virtually during the COVID-19 crisis.
- Worked with the Chief Constable to ensure there are processes and systems in place to deliver the Police and Crime Plan. This allows the Commissioner to be satisfied the Chief Constable has regard to the Police and Crime Plan through the strategic and operational plans of the Force.
- Measuring the quality of services, to ensure they are delivered in accordance with the Commissioner's objectives and represent the best use of resources and value for money.
- Defining and documenting the roles and responsibilities of the executive, non-executive, scrutiny and officer functions, with clear delegation arrangements and protocols for effective communication, in respect of the Commissioner and partnership arrangements.
- Ensuring effective arrangements are in place for the discharge of the head of paid service and monitoring officer functions.

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- Ensuring the Commissioner’s financial management arrangements conform to the governance requirements of the CIPFA Statement on the Role of the Chief Finance Officer of the Police and Crime Commissioner and the Chief Finance Officer of the Chief Constable (2021).
 - Ensuring compliance with the Commissioner’s statutory responsibilities, including:-
 - Setting the budget and precept
 - Issuing a Police and Crime Plan
 - Publication of an Annual Report
 - Publication of specified information
 - Duties to consult with victims of crime, the population as a whole and ratepayers
 - Safeguarding of children and promotion of child welfare
 - Having regard to the Strategic Policing Requirement. This is demonstrated through an annual report to the SPCB
 - Duties relating to equality and diversity
 - Procedure rules, policies and internal management processes are established for Financial Management, Procurement, Health and Safety, Confidential Reporting (“Whistleblowing”), Complaints Handling, Anti-Fraud, Bribery and Corruption and Records Management, including security of information and information sharing.
 - Codes of conduct, defining the standards of behaviour for the Commissioner, Members of the Strategic Policing and Crime Board, Statutory Officers and Staff.
 - The Joint Scheme of Corporate Governance sets out in detail the respective roles and functions of the Commissioner and Chief Constable, outlining all significant decisions which are consented or delegated and which are of a statutory, financial or management nature.
 - A Decision Making Policy is in place which establishes the approach and principles of decision-making. All decisions made by the Commissioner are recorded and published on line for transparency.
 - A Joint Audit Committee (with the Chief Constable) is responsible for independent assurance on the adequacy of the risk management framework and the associated control environment, the independent scrutiny of the Chief Constable’s and PCC’s financial performance to the extent that it affects the Chief Constable and PCC’s exposure to risk and weakens the control environment. The Joint Audit Committee has an independent Chair, as identified by the Home Office’s Code of Practice for Financial Management and CIPFA’s Audit Committee – Practical Guidance for Local Authorities and Police. A second independent member has also been appointed to the Joint Audit Committee who holds the position of Vice Chair of the Committee.
 - An Ethics Committee which advises the Commissioner and Chief Constable on data science projects being proposed by the Force’s Data Analytics Lab. The Lab is led by specially recruited data scientists and will develop programmes of work that use data more intelligently to help the Force prevent crime, allocate resources more efficiently and help it to do its job of keeping the public safe. The Ethics Committee has been set up to help ensure that ethics and people’s rights are put at the heart of the Lab’s work. Using the Committee’s expertise, the Force will be in a better position to help people avoid crime and support the communities of the West Midlands.

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- The PCC has a Corporate Risk Strategy and Register, prepared and reviewed by senior management. The Joint Audit Committee is responsible for independent assurance on the adequacy of the risk management framework.
 - Procedural rules, policies and internal management procedures are established for financial management.
 - Oversight of the management of change and transformation within the Force.
 - Ensuring the Commissioner's assurance arrangements conform to the governance requirements of the CIPFA Statement on the Role of the Head of Internal Audit (2019) and, where they do not, explain why they deliver the same impact.
 - An External Audit function reports to "those charged with governance" in respect of the Annual Accounts.
 - Ensuring compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful.
 - Identifying the development needs of members and senior officers in relation to their strategic roles, supported by appropriate training.
 - Establishing clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation. An example of this is the development of the West Midlands Violence Reduction Unit.
 - Developing good governance arrangements in respect of partnership and other joint working arrangements.
 - The Commissioner provides information to External Audit to enable them to provide assurance.
 - The Commissioner also ensures External Audit's recommendations are implemented.

The diagram below details how the Commissioner's governance structure is aligned to the governance structure of West Midlands Police.



5 Review of Effectiveness

The Commissioner has responsibility for conducting, at least annually, a review of the effectiveness of the governance framework.

The review of effectiveness is informed by the work of the managers within the Commissioner's Office, who have responsibility for the development and maintenance of the governance environment, the Head of Internal Audit's Annual report, and also by comments made by the External auditors and other review agencies and inspectorates.

In maintaining and reviewing the effectiveness of the governance arrangements, the following roles are undertaken:

- **The Commissioner**

The Commissioner is overall responsible for the maintenance and review of the governance arrangements and has asked his Statutory Officers, together with the Head of Internal Audit to continue with the review of the corporate governance arrangements, designed to assess and monitor:

- Code of Corporate Governance
- Review of the System of Internal Control
- Performance / Assurance Protocols and associated information
- Production of the Annual Governance Statement

- **The Joint Audit Committee**

The Commissioner's and Chief Constable's Joint Audit Committee is responsible, on behalf of both Corporations Sole, to:

- Advise the Commissioner and the Chief Constable according to good governance principles.
- Provide independent assurance on the adequacy and effectiveness of the Commissioner's and Chief Constable's internal control environment and risk management framework.
- Oversee the effectiveness of the framework in place for ensuring compliance with statutory requirements.
- Independently scrutinise financial and non-financial performance to the extent that it affects the Commissioner's and Chief Constable's exposure to risks and weakens the internal control environment.
- Oversee the financial reporting process and consider the arrangements to secure value for money
- Ensure the Force is implementing agreed actions resulting from Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspections.

The Terms of Reference of the Committee, encompasses and reflects these duties by defining that they:

- Be the conduit through which the Governance work is channelled.
- Provide assurance on risk management arrangements on behalf of the Commissioner.
- Recommend approval of the Statutory Accounts of the Commissioner and Chief Constable.

To ensure that it is ably qualified, assessments of its abilities in line with best practice are undertaken confirming that the Committee is well suited and equipped for such responsibilities. Members of the Committee will undergo regular training when required to ensure the Committee is effective in its role in advising the Commissioner and the Chief Constable.

- **Internal and Audit**

The system of Internal Audit is a primary tenet of corporate governance and is the joint responsibility of the Commissioner and Chief Constable. The provision and maintenance of an effective Joint Internal Audit Service, has been delegated to the Chief Finance Officer (CFO). The Audit Committee oversees the provision of this service, reviewing associated plans and work outputs.

The standards of Internal Audit are assessed against the Public Sector Internal Audit Standards (PSIAS) and an external assessment of Internal Audit against the PSIAS standards was undertaken in 2017/18. The results of the assessment were positive and the service continues to undertake a self-assessment against the standards on an annual basis with the results reported to the Joint Audit Committee.

During 2020/21 Internal Audit has continued the approach of concentrating on the major risks faced by the PCC and the Force. This revised approach has allowed the Commissioner to have increased confidence in the governance, risk management and control processes. In the construction of the Internal Audit plan for the year ahead, consultation has taken place with senior managers to ensure the areas of greatest risk are prioritised. The plan in 2020/21 was subject to revisions as a result of COVID-19 which restricted the availability of resources across WMP.

- **Police and Crime Panel**

The West Midlands Police and Crime Panel (WMPCP) scrutinises the work of the Commissioner. The Panel acts as a critical friend to the Commissioner - assisting him through independent challenge.

The Panel has a number of powers and responsibilities, including:

- Reviewing the draft Police and Crime Plan to ensure local priorities have been considered
- Scrutinising the Commissioner's Annual Report
- Scrutinising the decisions and actions of the Commissioner
- Reviewing, and potentially vetoing, the Commissioner's proposed policing precept (the part of Council Tax collected for policing)
- Holding confirmation hearings for the proposed appointment of a Chief Constable, Deputy Police and Crime Commissioner and senior support staff

- **West Midlands Police Change Programme**

A comprehensive change programme has been undertaken across West Midlands Police. The change programme included the development and introduction of a Target Operating Model (TOM). Many systems and processes have changed across the Force to ensure it remains efficient and continues to improve services to the public across the West Midlands. Certain systems continue to be introduced as part of the original change programme and the Force continues to improve. The change programme has inevitably resulted in changes to some existing governance arrangements, and poses new challenges for the Commissioner in holding the Chief Constable to account. To manage the change programme governance arrangements have been put in place to make sure the Commissioner has effective oversight of the project. These arrangements include:-

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- (i) Members of the Commissioner's office participate in the following boards:-
- Organisational Change Board
 - Design Authority

This ensures the Commissioner is well sighted on the delivery of the change programme and ensures the programme is in line the priorities of the Police and Crime Plan.

- (ii) Members of the Commissioner's office and the Strategic Policing and Crime Board are embedded in schemes at programme and project levels.

The continued significant changes to ICT infrastructure, organisational structure and procedures and the Corporate Estate, requires continued programme management. These are overseen by the Organisational Change Board and individual project boards. Also Internal Audit have undertaken pre-implementation reviews of key systems.

Alongside other changes the Commissioner continues to be responsible for the direct and indirect commissioning of services.

6 Collaborative Working

The Commissioner has in place a number of collaborative arrangements to deliver services in conjunction with both national and neighbouring Police and Crime Commissioners. These include:-

- A collaboration agreement in place for the counter-terrorism policing network that will be taking responsibility for Special Branch services from regional forces.
- The National Ballistics Intelligence Service (NABIS) where the West Midlands Police is the co-host force. The arrangement also being subject to a collaboration agreement and the Commissioner is represented on the NABIS governing board.
- The West Midlands Regional Organised Crime Unit (ROCU) is the subject of a four-force collaboration agreement (Staffordshire, Warwickshire, West Mercia and West Midlands). The future governance arrangements of the ROCU are likely to be impacted by Sir Craig Mackey's review of serious and organised crime.
- The West Midlands Violence Reduction Unit which was launched in 2019 and involved WMP, health and education professionals to work together to understand the causes of serious violence in the West Midlands and agreeing a co-ordinated response.
- A West Midlands wide Community Safety Partnership enabling crime reduction activities to be commissioned more effectively and efficiently.
- A Safer Travel Partnership with West Midlands Combined Authority and West Midlands Police that continues to significantly reduce crime on all modes of transport across the region.

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- An agreement with Birmingham Airport for WMP to provide policing services to the airport.
 - A shared Complaints Review Manager resource with Warwickshire's Police and Crime Commissioner. This post will review complaints against police officers on behalf of the Commissioner.
 - A regional approach in the introduction and operation of the Police Education Qualification Framework.
 - A bilateral collaboration with Warwickshire Police and Crime Commissioner where West Midlands Police are delivering a range of services to the Warwickshire Police.
 - The Regional Criminal Justice Forum which is a collaborative partnership between PCCs, forces and criminal justice colleagues across the West Midlands, designed to address cross cutting themes and issues that are affecting all four areas.

For the arrangements detailed above, governance is conducted in compliance with the relevant collaboration agreements. Also collaborative working is supported by the appointment of two Regional Policy Officers working with the four West Midlands regional forces.

There is also a two-force Central Motorway Policing Group arrangement in place between Staffordshire and West Midlands.

The Commissioner is also a signatory to the National Police Air Service (NPAS) collaboration agreement and is working with regional PCCs to develop appropriate and proportionate oversight. The future governance of NPAS is likely to be affected by a national review of police air support.

There are further collaborative arrangements that may come into effect through national programmes.

Through working with the West Midlands Combined Authority the Commissioner is collaborating on a wide range of issues this includes mental health and youth offending services.

The Commissioner is also in collaboration with other bodies this includes West Midlands Fire Service and local councils through the estates programme where policing is being delivered in shared buildings.

7 Review of CIPFA's FM Code

The CIPFA Financial Management Code (CIPFA FM Code) is designed to support good practice in financial management and to assist police organisations in demonstrating their financial sustainability. The CIPFA FM Code therefore sets the standards of financial management for PCCs and Forces. A key goal of the FM Code is to improve the financial resilience of organisations by embedding enhanced standards of financial management. There are also clear links between the FM Code and the Governance Framework, particularly with its focus on achieving sustainable outcomes.

An annual compliance review of the CIPFA FM Code has been completed across the PCC and Force in 2020/21 as part of the shadow year of introduction of the code. The majority of the assessment is RAG rated as green with no areas of concern. Therefore the PCC and the Force have complied with the principles of the FM code.

Work will continue in 2021/22 to improve and enhance financial accountability through reinforcement of roles and responsibilities and formalised training.

The Force has further developed its monthly financial performance reports and in 2021/22 will enhance this further with data on policing performance and outcomes.

8 Significant Governance Issues

Significant governance issues are defined as:

- An issue which has prevented or seriously prejudiced achievement of a principal objective
- An issue where additional funding has had to be sought in order to resolve it
- An issue which has resulted in a material impact on the accounts
- An issue which the Head of Internal Audit has specifically highlighted in the annual audit opinion
- An issue which has attracted significant public interest and has damaged the reputation of the Commissioner
- An issue which has resulted in formal action being taken by the Chief Finance Officer and/or the Monitoring Officer.

A significant issue that occurred during 2020 was the outbreak of the Coronavirus across the world. This led to the Commissioner introducing an emergency chapter in the police and crime plan. This covers the following objectives:-

- Ensuring West Midlands Police responds efficiently and effectively to COVID-19, and works in partnership to protect the public of the West Midlands.
- Protecting the organisational health of West Midlands Police, so it not only responds to the national emergency effectively, but recovers and returns to normality as quickly as possible.
- Lead and support the partnership response to the national emergency.
- Ensuring the Office of the Police and Crime Commissioner does all it can to effectively respond to the national emergency, commissioning services that mitigate its effect and support the return to normality.

The Commissioner has put structures in place to ensure the above objectives are being delivered during COVID-19. This includes a delivery plan supporting the objectives and meetings of the Strategic Policing and Crime Board where the Force has been held to account on the delivery of

the plan. Throughout 2020/21 employees of the OPCC worked from home and had the necessary equipment to undertake their roles.

Internal Audit completed a follow up review during 2020/21 of the Missing Persons audit that was originally undertaken in October 2019. The review confirmed that the recommendations and additional actions determined by management are being progressed, but have not yet been fully implemented and embedded, with a lack of safe and well checks/return home risk assessments still being evident in logs and open logs continuing to experience delays in being resourced with the escalation doctrine not being applied, all of which were key issues previously reported. The review concluded that there was no change in the minimal assurance opinion or recommendation ratings at this time. However the Force in early 2021 completed a deep dive exercise and through new approaches they have reduced the response times for domestic abuse and missing calls which are now within half an hour of the median response times for all P2 calls.

The Commissioner has continued to hold the Chief Constable to account where reductions in funding have had potential impact on business as usual activities of the Force. This has included areas such as the Force's Response Service and Force Contact. Reductions of funding have coincided with recent increases in violent crime, where again the Commissioner has held the Chief Constable to account.

The Commissioner is sighted on any significant issues arising from the work of Internal Audit and will, where necessary, question the Chief Constable on any actions being taken to address the issues raised.

The financial position of the Commissioner and WMP continues to be under pressure. This is due to pressures including expenditure items required to tackle COVID-19 and ongoing cost pressures such as inflation. The financial position continues to be monitored closely to ensure the financial stability of the organisations. During 2020/21 this included regular financial monitoring reports to SPCB.

Also the lack of certainty over the levels of funding for policing the West Midlands means it is difficult to financially plan for more than one financial year. However, the medium term financial plan (MTFP) for the Commissioner and Force was approved as part of the 2021/22 budget. The MTFP includes a sensitivity analysis on assumptions made. There are further uncertainties with police funding due to future impacts of COVID-19 on policing, the impacts of the pandemic on the economy and only receiving annual allocations for priorities such as violence reduction. Only receiving annual allocations is also referred to in Section 7 of this document.

9 Delivering the Police and Crime Plan

During 2021/22 a new police and crime will be developed covering the period up to 2024. The delivery of the Police and Crime Plan will assist the Commissioner to secure and maintain efficient and effective policing services across the West Midlands. The Commissioner will continue to work with West Midlands Police in the delivery of the Force's strategies and plans.

10 Issues Raised in Previous Year's Annual Governance Statements

COVID-19 was a significant issue raised in last year's statement. This document sets out how the Commissioner has dealt with the pandemic throughout 2020/21.

Weaknesses in the management of sex offenders was raised by Internal Audit in previous years which resulted in additional scrutiny by Joint Audit Committee and also by the Commissioner's Board in January 2020. During 2020/21 Internal Audit completed a further review of Sex Offender Management arrangements resulting in a reasonable assurance opinion being given. Significant improvements were noted by Internal Audit in progressing Active Risk Management Assessments of registered sex offenders and other recommendations were being progressed by management reducing the need for additional scrutiny by Joint Audit Committee during the year.

During 2018/19, Internal Audit reported on weaknesses in the legacy systems of West Midlands Police. Gradually, these legacy systems have been replaced and whilst some recommendations were implemented others have now become redundant. Internal Audit have encouraged lessons learnt from their reviews to be considered during new systems implementations and this was evidenced in the implementation of the Connect system which applies role based access. During 2020/21 Joint Audit Committee applied additional scrutiny to the 2019/20 Internal Audit of database access and administration with an update on progress reported to the Committee. Any outstanding recommendations continue to be followed up by Internal Audit.

The Commissioner has continued to hold WMP to account in relation to areas that have witnessed high demands for service. This includes Force Response and the Contact Centre. The Police Officer Uplift programme will provide more resources to the Force and help in these areas. Also the violence reduction initiatives such as Surge funding and the Violence Reduction Unit will assist in the reduction of violent crime.

11 Future Developments

Looking forward there are several initiatives that will potentially impact on the role and remit of the Commissioner that may require governance arrangements to be amended. These include:-

- The continued impacts of COVID-19 on policing the West Midlands. This includes any immediate impacts and how the area recovers from the pandemic.
- The impacts on COVID-19 on the public of the West Midlands this includes the social and economic consequences of the pandemic.
- Further collaborative working with police forces in areas such as serious and organised crime, counter terrorism, roads policing and uniformed operations, with a concurrent requirement to develop effective collaborative governance arrangements based on formal collaboration agreements.
- The continued operation of the West Midlands Violence Reduction Unit.
- The outcome of the planned 2021 Comprehensive Spending Review and the impacts on funding for the policing of the West Midlands.

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- The future implementation of a revised funding formula for policing will have implications on the level of resources available for policing services across the West Midlands.
 - Any continuing impacts on policing from the United Kingdom's exit from the European Union.
 - Ensuring new Force systems operate effectively and generate efficiencies.
 - The risks associated with achieving the police officer Uplift programme targets and ensuring the extra officers are deployed in priority areas across the Force.
 - The increasing role of PCCs in the Criminal Justice System, particularly following the new national policy for probation services.
 - The introduction of national crime and policing measures.
 - Implement the outcomes of Part One of the Government's review of PCCs. For example, amendments to the Specified Information Order will require the Commissioner to provide a narrative on WMP's performance against the Government's crime measures, and HMICFRS force performance reports. There will be further actions from Part Two of the review of PCC's that will be implemented as necessary.
 - The continued implementation of an Estates strategy that was approved in March 2018. This includes the investment in new facilities and releasing vacant properties.
 - Commonwealth Games in 2022 and Coventry's City of Culture, including the Force's preparation for policing these events.
 - The green agenda including to make sure the Force is exploring and implementing strategies to reduce energy consumption across the police estate and vehicles.
 - Working with the West Midlands Combined Authority on joint projects to assist in the prevention of crime in the West Midlands.
 - The duty to cooperate across police, fire and ambulance services.

12 Monitoring the Implementation of Actions

The systems that have been put in place to monitor the implementation of plans through delivery plan and the risk register will ensure activities detailed in this statement are implemented. Progress of the implementation of actions will be reported in next year's Annual Governance Statement.

Signed

Simon Foster
Police and Crime Commissioner West Midlands



west midlands
police and crime
commissioner

Jonathan Jardine
Head of Paid Service, West Midlands Police and Crime Commissioner

Mark Kenyon
Chief Finance Officer, West Midlands Police and Crime Commissioner



West Midlands Police

Annual Governance Statement

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1. Introduction

This Annual Governance Statement (AGS) explains how the Chief Constable governs West Midlands Police Force through a system of internal controls. The Chief Constable has adopted a Code of Corporate Governance, consistent with the principles of the CIPFA/SOLACE 2016 updated framework: *Delivering Good Governance in Local Government*, a copy of which is on our website at www.west-midlands.police.uk or can be obtained by contacting us, details at www.west-midlands.police.uk/contact-us/index.aspx. This statement explains how the Chief Constable has complied with the code and also meets the requirements of the Accounts and Audit Regulations 2015, regulation 6(1), which requires all relevant bodies to prepare an annual governance statement.

2. Scope

The Chief Constable is responsible for ensuring the force's business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for and used economically, efficiently and effectively. The Chief Constable also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

In discharging this overall responsibility, the Chief Constable is also responsible for putting in place proper arrangements for the governance of its affairs and facilitating the exercise of its functions, which includes ensuring a sound system of internal control is maintained through the year and that arrangements are in place for the management of risk.

3. The Governance Framework

The governance framework comprises the systems, processes, culture and values by which the Chief Constable directs and controls activities through which it accounts and engages with the community. It enables the Chief Constable to monitor the achievement of strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services, including achieving value for money.

The system of internal control is a significant part of the governance framework and is designed to manage risk. It cannot eliminate all risk of failure to achieve policies, aims and objectives; it can therefore only provide reasonable and not absolute assurance of effectiveness.

The system of internal control is based on an on-going process designed to identify and prioritise the risks to the achievement of the Chief Constable's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them effectively, efficiently and economically.

The Chief Constable is responsible for operational policing matters, the direction and control of police personnel, and for putting in place proper arrangements for the governance of the force. The Chief Constable is held to account for the exercise of those functions and those of the persons under his direction and control, by the Police and Crime Commissioner.

It therefore follows that the Commissioner must satisfy himself that the force has appropriate mechanisms in place for the maintenance of good governance. For these to operate in practice, the Commissioner and the Chief Constable have separate but complimentary governance structures. These facilitate the achievement of effective governance

arrangements, including the monitoring and assessment of performance in line with statutory responsibilities.

Our Values

West Midlands Police is made up of people like you:

I prevent crime

- I work in partnership to create safer communities
- I am creative and think of new approaches

I offer friendship and service

- I care about the people I serve
- I am honest and I earn people's trust
- I show friendship by helping the public, partners and colleagues – particularly those who may not realise they need our help

I am courageous and fair

- I stand up for the right things
- I challenge unreasonable and discriminatory behaviour
- I make the right decisions, however tough they are
- I want to work in a diverse team

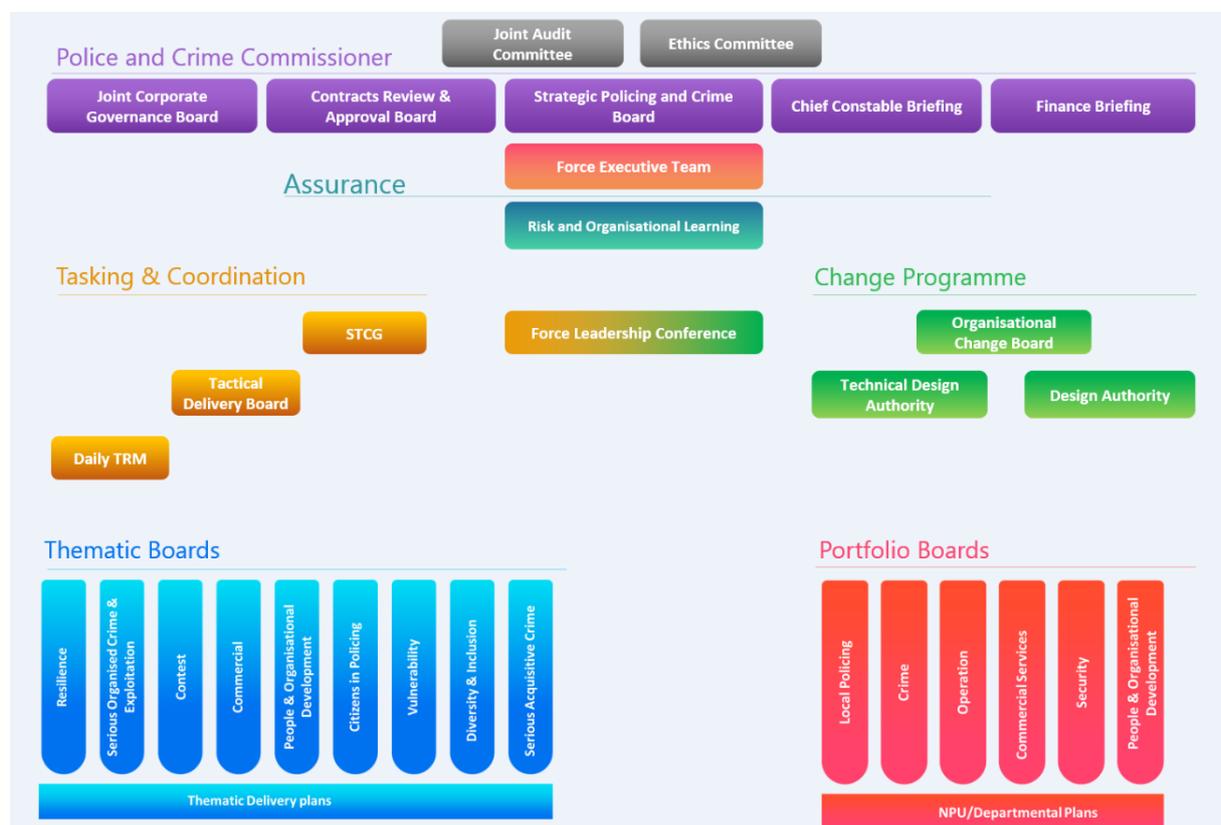
I listen and learn

- I accept and admit when I am wrong
- I learn lessons
- I let the public see how we work because I welcome openness

I am proud of what I do

- I am a strong performer and colleagues can rely on me
- I inspire others with my passion for policing
- I challenge and address poor service
- I deliver a service my family would be proud of

West Midlands Police Strategic Governance Structure:



The 'Delivering Good Governance standard for public services 2016' sets out the seven good governance core principles. The key elements of the systems and processes that have been put in place for the force and how the force adheres to these seven principles is evidenced below.

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

Evidence to demonstrate Principle A includes;

- ✓ The Chief Constable's Vision and Values, in conjunction with the Code of Ethics, define the standards expected of everyone working in policing and is communicated to all officers and staff.

- ✓ The Standards of Professional Behaviour reflect the expectations of the public and are governed by specific policies, procedural rules and internal management processes that cover the activities of the force:
 - Financial Management
 - Procurement
 - Health and safety
 - Gifts and Hospitality
 - Business Interests
 - 'Whistleblowing' – Confidential Reporting
 - Complaints Handling
 - Anti-Fraud, Bribery and Corruption
 - Information Security
 - Information sharing
 - Data Protection
 - General Data Protection Regulations

- ✓ At a national level, the force cooperates in the National Fraud Initiative which attempts to identify fraud by sharing and comparing employee data across the public sector.

- ✓ Within the force there are two formal codes of conduct, one for police officers and one for police staff. Both codes define the standards of personal behavior expected. The officer code also sets out requirements in terms of use of force, performance, execution of duties and other general conduct expectations. Certain staff, e.g. qualified accountants or solicitors, will have professional codes of conduct to which they are held to account.

- ✓ An Ethics Committee has been established which is responsible for providing the Chief Constable and PCC with independent advice around ethical issues arising from the data analytics projects.

5. Principle B: Ensuring openness and comprehensive stakeholder engagement

Evidence to demonstrate Principle B includes;

- ✓ The West Midlands Police web site includes the current Freedom of Information (FOI) publication scheme in its 'Your right to information' pages.
- ✓ The Office of the Police and Crime Commissioner sets the overall strategic direction for the Chief Constable and the force through the objectives contained in the Police and Crime Plan, setting the force budget and determining the precept, commissioning services, and holding the Chief Constable to account on behalf of the public. The Police and Crime Plan covers the period 2016-2020, due to Covid-19 the Police and Crime Commissioner Elections scheduled for May 2020 were put back to May 2021.
- ✓ The force website aids agile accessibility to the police service by providing advice, enabling a member of the public to report an incident, track their case and undertake live web chat to report all non-emergency crimes online.
- ✓ The force actively involves communities across the force geography. The approach involves public meetings including community forums, independent advisory groups, scrutiny panels and messaging via WMNOW.
- ✓ There is also active involvement with the full range of media such as press, TV, social media and public surveys.
- ✓ The force works closely with Independent Advisory Groups and independent scrutiny panels to increase levels of trust and understanding in our diverse communities, support the most vulnerable and make sure our engagement is targeted and meaningful.
- ✓ Governed by the Citizens in Policing Board, the force has a comprehensive Citizens in Policing programme which seeks to increase citizen participation in policing and community safety by developing the scale and variety of opportunities for volunteers, special constables, cadets and a number of watch schemes.
- ✓ The force engages and collaborates with a significant number of partners within the region. An example being the work of the West Midlands Violence Reduction Unit which is jointly chaired by an Assistant Chief Constable and Public Health Lead. The WMVRU aims to bring together partners to work together with the shared understanding that



violence and its associated harms are preventable. The WMVPA is a member of the World Health Organisation Violence Prevention Alliance international network.

- ✓ WMP regularly speaks to its communities and partners to share the experiences and develop ideas and practices. We use the Four Key Principles (Voice, Dignity and Respect, Trustworthy Motives and Neutrality) to ensure we all understand what we're doing. Understanding what people think of the Force's practices helps WMP to change and constantly improve what it does. With greater levels of citizen satisfaction comes an increase in trust and legitimacy.

6. Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits

Evidence to demonstrate Principle C includes;

- ✓ The WMP strategy defines a number of economic, social and environmental outcomes to be delivered during the next three years.
- ✓ The Policing Vision 2025 highlighted trends most likely to impact policing by 2025 and the College of Policing's Future Operating Environment 2040 provides an insight into policing's operating environment as far as 2040, we consider the implications of these kind of trends, scenarios and future challenges on WMP as part of our annual strategic assessment within our strategy and business planning cycle.

7. Principle D: Determining the outcomes necessary to optimise the achievement of the intended outcomes

Evidence to demonstrate Principle D includes;

- ✓ Strategic governance is in place to monitor and track activity against WMPs three year strategy. This includes the monthly Force Leadership Conference and quarterly Strategic Tasking and Co-ordination group meeting which are in place to drive the key limbs of the strategy.
- ✓ Force performance is scrutinized via both strategic and tactical force level governance structures. Portfolio and thematic boards are in place to manage performance within the portfolio areas and provide the necessary oversight and assurance.

- ✓ The force planning cycle incorporates an annual strategic assessment, annual Force Management Statement (FMS) and financial plans.
- ✓ The Medium Term Financial Plan (MTFP) has been updated which forms the basis of the annual budgets and provides a framework for the evaluation of future proposals.
- ✓ Decision-making at all levels of the force is undertaken within the framework of the National Decision Model, which has the Code of Ethics at its core.
- ✓ WMP continue to utilise the Threat Harm Risk Investigation Vulnerability Engagement (THRIVE) framework across functions. It underpins all decision making in the force and encourages flexible and adaptable risk management, while empowering staff and officers at all levels to have confidence in the decisions that they make.



8. Principle E: Developing the Force’s capacity, including the capability of its leadership and the individuals within it

Evidence to demonstrate Principle E includes;

- ✓ As part of WMP’s strategy, a ‘People Strategy’ has been launched which outlines what WMP expects from its personnel and what people can expect, in return, from the organisation.
- ✓ The strategy incorporates a future facing leadership framework, with individuals aiming to be champions in the workplace; creating an environment which supports, challenges and enables WMP officers and staff to be the best they can be in order to bring the vision and values, as referenced under Principle A, to life.
- ✓ The Force Executive Team have clearly defined leadership roles and objectives; they are responsible for implementing strategy and managing the delivery of services within their respective portfolios.
- ✓ WMP Conversations continues to be delivered across the force as a way of engaging with the workforce and evidencing individual and team performance and capability. This has recently been re-launched with a focus on measuring and improving our

performance to meet the strategic objectives and drive personal, departmental and force wide deliverables.

- ✓ To build on capacity, collaboration arrangements are in place with neighboring forces for significant service areas including CMPG and Legal Services and future collaboration is being planned.
- ✓ Regional and national governance arrangements are in place in relation to national and regional programmes (Single Online Home, Specialist Capabilities, and Blue Light Collaboration etc.)
- ✓ The innovative Data Driven Insight (DDI) project continues to drive the force wide agenda in terms of data analytics. It delivers a single, cleansed and integrated data set which provides an enterprise wide search capability directly into the hands of our front line officers on their mobile devices, transforming data access, intelligence and tools. This system provides deep insight and analytics, creating the step change in how information drives our actions.
- ✓ As part of the HMICFRS Integrated PEEL Assessment (IPA), WMP's arrangement planning for future demand was graded as 'Outstanding'.
- ✓ An in-house automation capability within IT&D continues to deliver force wide capabilities.
- ✓ To build on the force's expertise, there are knowledge transfer arrangements in place as part of the previous five year strategy (WMP2020), along with numerous academic collaboration work streams.
- ✓ The Chief Constable continues to host a number of Lead2Achieve and Senior Leadership events to develop the capability of its leadership at all levels within the organisation.

9. Principle F: Managing risks and performance through robust internal control and strong public financial management

Evidence to demonstrate Principle F includes;

- ✓ The force has an Organisational Risk Management Policy and Risk Register, prepared and reviewed by the Deputy Chief Constable and managed via the Risk and

Organisational Learning Board. The Joint Audit Committee (with the PCC) is responsible for independent assurance on the adequacy of the risk management framework.

- ✓ The force ensures all decision-making processes are overseen by correct governance structures. Each member of the Force Executive Team (FET) leads a specific portfolio board and chairs thematic boards, all of which incorporate sub-groups for specific functions and themes. This oversight from the highest level ensures that there is no disconnect at any level of management in the continued delivery of force performance and ambitions. Risk is discussed as a regular agenda item within these portfolio and thematic boards. These meetings ensure risks are being managed and mitigated as well as providing the gateway for force wide risks to be escalated through the force governance structures.
- ✓ Objectives are defined within the WMP Conversations of each executive team member and cascaded throughout the organisation's approach to performance management.
- ✓ Performance management forms part of the force governance arrangements. Performance information is scrutinised by the Force Executive Team via the boards they chair and the Quarterly Performance Reviews (QPRs) they hold. Deep dives of performance take place at the most senior level of the organization.
- ✓ An increasing number of ready available performance dashboards allow for detailed performance information to be available to supervisors.
- ✓ Her Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS) independently assesses operational policing processes and reports the performance of the force at a national level. The force tracks and monitors all recommendations and areas for improvement from HMICFRS via the force governance structures.
- ✓ Strong public financial management is evidenced through the following strategies and reports:
 - Medium Term Financial Plan
 - Annual Financial Strategy
 - Budget Monitoring reports
 - Annual Statement of Accounts
 - Treasury Management Strategy

- Treasury Management Reports
- Reserves Strategy
- Benefit Realisation plans
- HMICFRS Value for Money Profile
- CIPFA Financial Management Capability Review

10. Principle G: Implementing good practices in transparency, reporting and audit to deliver effective accountability

Evidence to demonstrate Principle G includes;

- ✓ A Joint Audit Committee is responsible for independent assurance on the adequacy of the risk management framework and the associated control environment, the independent scrutiny of the Chief Constable's and the PCC 's financial performance to the extent that it affects the Chief Constable and PCC's exposure to risk and weakens the control environment.
- ✓ The Joint Scheme of Corporate Governance sets out in detail the respective roles and functions of the Commissioner and Chief Constable, outlining all significant decisions which are consented or delegated and which are of a statutory, financial or management nature.
- ✓ All major change and transformation programmes and projects have their own project boards and adhere to consistent force change control processes which include addressing risk management and mitigation.
- ✓ An External Audit function reports to "those charged with governance" in respect of the Annual Accounts to ensure they are prepared in accordance with legislation, accounting standards and good practice. As well as issuing a statutory opinion on the accounts they also issue a statutory opinion on the Chief Constables arrangements for securing value for money, measured as economy, efficiency and effectiveness, which sits alongside the HMICFRS assessment work.
- ✓ This Annual Governance Statement is published alongside the Statement of Accounts.
- ✓ Regular publication (subject to confidentiality tests) of reports presented to the Strategic Policing and Crime Board.

11. Review of CIPFA's FM Code

The CIPFA Financial Management Code (CIPFA FM Code) is designed to support good practice in financial management and to assist police organisations in demonstrating their financial sustainability. The CIPFA FM Code therefore sets the standards of financial management for Forces. A key goal of the FM Code is to improve the financial resilience of organisations by embedding enhanced standards of financial management. There are also clear links between the FM Code and the Governance Framework, particularly with its focus on achieving sustainable outcomes.

An annual compliance review of the CIPFA FM Code has been completed across the Force in 2020/21 as part of the shadow year of introduction of the code. The majority of the assessment is RAG rated as green with no areas of concern. Therefore the Force have complied with the principles of the FM code.

Work will continue in 2021/22 to improve and enhance financial accountability through reinforcement of roles and responsibilities and formalised training.

The Force has further developed its monthly financial performance reports and in 2021/22 will enhance this further with data on policing performance and outcomes.

12. Review of effectiveness

The Chief Constable has responsibility for an annual review of the effectiveness of the Governance Framework. The review of effectiveness is informed by the work of the Force Executive Team within West Midlands Police, who have responsibility for the development and maintenance of the governance environment, the Internal Audit Annual report, and also by comments made by the external auditors and other review agencies and inspectorates. In maintaining and reviewing the effectiveness of the governance arrangements, the following roles are undertaken:

The Force

The Chief Constable operates a system of strongly controlled arrangements for the delivery of operational policing in its communities, together with management and monitoring arrangements for:

- Performance management and associated reporting;
- Financial management;
- Standards of data quality that underpin key reporting requirements;
- The professional standards of police officers and staff in the force;
- Programme and project management.

These functions are organised within clear reporting structures in the force, designed to provide the Chief Constable and the Executive Team with assurances as to the effective delivery of operational policing and the Commissioner's Policing and Crime plan.

To increase understanding and improve transparency around force governance, a 'Governance and Knowledge' portal has been developed where all staff and officers are able

to access key governance documents such as board terms of references, actions and decisions and summaries of meetings.

The Joint Audit Committee

The Commissioner and Chief Constable have established a Joint Audit Committee to be responsible, on behalf of both Corporations Sole, to:

- Advise the Commissioner and the Chief Constable according to good governance principles;
- Provide independent assurance on the adequacy and effectiveness of the Commissioner's and Chief Constable's internal control environment and risk management framework;
- Oversee the effectiveness of the framework in place for ensuring compliance with statutory requirements;
- Independently scrutinise financial and non-financial performance to the extent that it affects the Commissioner's and Chief Constable's exposure to risks and weakens the internal control environment;
- Oversee the financial reporting process.
- Ensure the Force is implementing agreed actions resulting from HMICFRS inspections and thematic reviews/reports.

Internal Audit

The system of Internal Audit is a primary tenet of corporate governance and is the responsibility of the Commissioner. The provision and maintenance of an effective shared Internal Audit service for the PCC and CC has been delegated to the PCC's Chief Finance Officer. The Audit Committee oversees the provision of this service, reviewing associated plans and work outputs.

13. Significant governance issues 2020/21

During the Coronavirus pandemic, key parts of force governance have run uninterrupted via virtual channels, including the Strategic Tasking, Force Leadership Conference and Force Tasking.

A small number of the forces 'business as usual' functions were paused alongside the corresponding governance structures including a number of thematic boards. As the force is returning to business as usual, these thematic boards have since been re-established.

During Covid 19, a separate but complementary governance framework was put in place to deliver against local and national objectives. This included a Strategic Co-ordination Group chaired by a Gold Commander (at Assistant Chief Constable level), which together with external partners, was responsible for delivering the regional response to the pandemic.

A Silver Commander at Assistant Chief Constable level, was also put in place to focus on the forces internal response, focusing and driving key issues such as resilience, welfare and resourcing etc.

A Covid Recovery Board, chaired by the Deputy Chief Constable, was also established to ensure the force continued to operate, whilst also capturing and embedding the learning from Covid as the force moves back to business as usual.

Full consultation with external partners continued to take place, this has included Independent Advisory Groups, consultation with Children and Adult Services and Key Individual Networks and engagement with the Multi Agency Public Protection Arrangement process.

In respect of Internal Audit, the plan in 2020/21 was subject to revisions as a result of COVID-19 which restricted the availability of resources across the force. The audits completed considered the risks relating to Covid as part of each review. Regular updates on progress against the plan along with significant findings from completed audits were reported to Joint Audit Committee throughout the year.

Other significant structures continued including Misconduct Hearings by WMPs Professional Standards Department.

A Governance improvement plan has been devised but there are no significant issues on this and all of the areas refer to business as usual.

14. Conclusion and Commitment Statement

The scale of change facing the Chief Constable remains extremely challenging, at a time when the demand and need for sustained and improved service to the public continues to increase. This will require firm leadership, careful management, innovation and robust governance.

The systems and processes the Chief Constable has in place to monitor the implementation of the Police and Crime Plan will ensure activities detailed in this statement are implemented. The governance arrangements of the PCC and the Chief Constable will remain under constant review in the forthcoming financial year.

Signed

Dave Thompson
Chief Constable of West Midlands Police

Neil Chamberlain.
Director of Commercial Services West Midlands



Mapping of Governance Framework Key Elements / Governance Dashboard – 2020/21 – Applying CIPFA’s Seven Principles of Good Governance in Policing

PRINCIPLE A - BEHAVING WITH INTEGRITY, DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF LAW

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Behaving with Integrity</p> <ul style="list-style-type: none"> • Ensuring that the PCC, chief officers and staff behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby promoting and upholding the reputation of the organisation among its stakeholders. • Ensuring the PCC and chief officers lead in establishing specific standard operating principles or values for their organisations and staff and that they are communicated and understood. The values should build on the Nolan Principles and the Code of Ethics. • Leading by example and using above standard operating principles or values as a framework for decision making and other actions. • Demonstrating, communicating and embedding the standard operating principles or values through 	<ul style="list-style-type: none"> • PCC code of conduct • Standards of professional behaviour, Force policy • Performance appraisal process in place for all staff across the PCC and Force • Evidence of communicating shared values with staff, the community and partners. This is through the Police and Crime Plan, Force strategies etc. • Establishment of a Standards and Employee Relations subgroup at the Force • Ethics Committee • Decision making policies in place. Scheme of governance details the requirements around decisions • Police and Crime Plan (2016-20) developed in consultation with partners, including local authorities, Police and Crime Panel. Police and 	<p>Maintaining</p>	<p>Green</p>

<p>appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively.</p>	<p>Crime Plan the driver for decisions. Emergency chapter developed during 2020 to cover COVID-19. Emergency chapter used to hold WMP to account.</p> <ul style="list-style-type: none"> • HMICFRS police effectiveness, efficiency and legitimacy programme (PEEL) assessments in 2018/19 rated as good. There is an inspection taking place during 2021. • Professional Standards Dept, reports to Strategic Police and Crime Board and Joint Audit Committee on fraud and corruption • Anti-fraud and corruption policy reviewed regularly and communicated with board and Force Executive Team • Co-operation with the National Fraud Initiative • Up-to-date register of interests for PCC, chief officers and their respective staff. In addition the Force maintains a Business Interest Register • There is up to date lists register of gifts and hospitality across the Force and PCC • There are Whistleblowing and Confidential reporting policies in place and protect individuals raising concerns. These are well understood and communicated across the organisation • The Force's People Strategy • Force and PCC have a complaints policy in place. Force complaints are monitored and reported against through performance reports to Force Executive Team and PCC's Board. Also complaints reported and monitored to West Midlands Police and Crime Panel • There is evidence of changes/improvements as a result of complaints received and acted upon • There are policies and procedures in place across the organisations setting out the expectations for staff to meet the required standards • The expectations the organisations place on suppliers is set out in tender and contract documentation 		
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<p>Demonstrating strong commitment to ethical values</p> <ul style="list-style-type: none"> • Seeking to understand, monitor and maintain the organisation’s ethical performance. • Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation’s culture and operation. • Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values. • Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the organisation. 	<ul style="list-style-type: none"> • Policy in place for declaring interests for board members, police officers and staff. • Code of conduct in operation • Professional standards monitoring • The standards of professional behaviour also reflect relevant principles enshrined in the European Convention on Human Rights and the Council of Europe Code of Police Ethics • Major PCC decisions consults with Board members • The policies and procedures of the organisation set out the expectations to meet the required standards • Procurement strategy in place. Progress on delivery of the strategy reported on yearly. The strategy includes requirements relating to Social Value • Social Value Portal introduced to monitor and report on achievement of social value • Appraisal approach includes expected behaviours 	Maintaining	Green
<p>Respecting the rule of law</p> <ul style="list-style-type: none"> • Ensuring the PCC, chief officers and staff demonstrate a strong commitment to the rule of law as well as adhering to relevant laws and regulations. • Creating the conditions to ensure that statutory chief officers, other key post holders and (where appropriate) statutory committees are able to fulfil their responsibilities in accordance with best practice. • Striving to use full powers for the benefit of citizens, communities and other stakeholders. • Dealing with breaches of legal and regulatory provisions effectively. • Ensuring corruption and misuse of power are dealt with effectively. 	<ul style="list-style-type: none"> • Police and Crime Plan in place following extensive consultation • Policies reviewed on an ongoing basis and kept up to date • Scheme of governance up to date • Compliance with CIPFA statements of the role of statutory finance officers • Effective anti-fraud and corruption policies • Internal Audit function, delivery of a risk based plan • Legal implications considered as part of decision making process 	Maintaining	Green

PRINCIPLE B - ENSURING OPENNESS AND COMPREHENSIVE STAKEHOLDER ENGAGEMENT

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Openness</p> <ul style="list-style-type: none"> • Ensuring that the PCC, chief officers and staff behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby promoting and upholding the reputation of the organisation among its stakeholders. • Ensuring the PCC and chief officers lead in establishing specific standard operating principles or values for their organisations and staff and that they are communicated and understood. The values should build on the Nolan Principles and the Code of Ethics. • Leading by example and using above standard operating principles or values as a framework for decision making and other actions. • Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively. 	<ul style="list-style-type: none"> • Annual report produced • Up to date publication scheme • Precept leaflet produced • Effect PCC website and Force website revised and improved • Record of PCC decisions published on website • Established PCC processes and procedures for decisions in relation to grant funding activity (including victims fund etc). This includes publication on website • Strategic Police and Crime Board and Joint Audit Committee meetings published with live webcasting. Meetings have operated virtually during pandemic and broadcast live on a public platform • PCC decision making policy published on website • Reports include legal and financial comments • Decision making reports produced for PCC decisions • Forward plan of PCC decisions and workplan for Strategic Police and Crime Board • Precept survey undertaken • Active Citizens programme • Cybercrime survey 	<p>Maintaining</p>	<p>Green</p>

	<ul style="list-style-type: none"> • FOI publication scheme • Independent Advisory Groups • Independent Scrutiny Panels 		
<p>Engaging comprehensively with institutional stakeholders</p> <ul style="list-style-type: none"> • Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably. • Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively. • Ensuring that partnerships, including collaborations, are based on trust, a shared commitment to change, and a culture which promotes and accepts challenge among partners and that the added value of partnership working is explicit. 	<ul style="list-style-type: none"> • Communication strategy for the PCC and Force developed and implemented • Collaborations agreements in place with neighbouring PCCs • Collaboration with the West Midlands Combined Authority • Partnerships developed for particular priorities for example violence reduction unit, criminal justice board and victims commission • Community Safety partnerships both with the 7 local authorities and the creation of a West Midlands wide Community Safety partnership • Leading on national procurement initiatives and engaged with Blue Light Commercial 	Maintaining	Green
<p>Engaging with individual citizens and service users</p> <ul style="list-style-type: none"> • Establishing a clear policy about the type of issues on which the organisation will meaningfully consult with, or involve, individual communities, citizens, service users and other stakeholders to ensure that a service (or other) provision is contributing towards the achievement of intended outcomes. • Ensuring that communication methods are effective and that the PCC and officers are clear about their roles with regard to community engagement. 	<ul style="list-style-type: none"> • Record of public consultations • Community safety plans developed in line with the police and crime plan • WMP's contact strategy and engagement with communities including surveys • Policing strategic assessment • Police and Crime Plan • Force's Ambition Plan • Medium Term Financial Plan • Recognition of the strategic policing requirement • Active Citizen Programme 	Maintaining	Green

<ul style="list-style-type: none">• Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs.• Implementing effective feedback mechanisms for those consultees in order to demonstrate how their views have been taken into account.• Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity.• Taking account of the interests of future generations of taxpayers and service users.			
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PRINCIPLE C: DEFINING OUTCOMES IN TERMS OF SUSTAINABLE ECONOMIC, SOCIAL AND ENVIRONMENTAL BENEFITS

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Defining outcomes</p> <ul style="list-style-type: none"> • Having a clear vision – an agreed formal statement of the organisation’s purpose and intended outcomes containing appropriate performance indicators which provides the basis for the organisation’s overall strategy, planning and other decisions. • Specifying the intended impact on, or changes for, stakeholders including individual citizens and service users. It could be immediately or over the course of a year or longer. • Delivering defined outcomes on a sustainable basis within the resources that will be available, while recognising that changing and unforeseen demands will place additional pressure on financial resources. • Identifying and managing risks to the achievement of outcomes as part of delivering goods and services. • Managing expectations effectively with regard to determining priorities and making the best use of the resources available. 	<ul style="list-style-type: none"> • Police and crime plan used as a basis for planning • Community engagement and involvement in the development of the service plan • Police and Crime Plan delivery plan, linked to workplan • Chief Constables ambition and delivery plan (This Work Matters) • Force Management Statements • Strategic tasking and coordination • Progress reports against police and crime plan • Performance reports considered by the Commissioner’s board • Established performance measures and report regularly • Medium term financial plan • Strategic policing requirement • Acting on HMICFRS assessments and recommendations. Recommendation tracker in place • Established risk management strategy and monitor of risks 	Maintaining	Green
<p>Sustainable economic, social and environmental benefits</p> <ul style="list-style-type: none"> • Considering and balancing the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about services. 	<ul style="list-style-type: none"> • Capital programme aligned to WMP2020 transformation programme • Information and briefings provided to PCC to enable effective briefings • Record of decisions made 	Maintaining	Green

<ul style="list-style-type: none"> • Taking a longer term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the PCC and the chief officer's intended outcomes and short term factors such as the political cycle or financial constraints • Ensuring fair access to services. 	<ul style="list-style-type: none"> • WMP2020 governance arrangements including appropriate gateways, outline business case, detailed business cases and other gateways where necessary • PCC economic strategy 		
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PRINCIPLE D: DETERMINING THE INTERVENTIONS NECESSARY TO OPTIMISE THE ACHIEVEMENT OF THE INTENDED OUTCOMES

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Determining interventions</p> <ul style="list-style-type: none"> Ensuring that decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and including the risks associated with those options. Therefore ensuring that best value is achieved however services are provided. Considering feedback from citizens and service users when making decisions about service improvements, or where services are no longer required, in order to prioritise competing demands within limited resources available including people, skills, land and assets, and bearing in mind future impacts. 	<ul style="list-style-type: none"> Decision making framework in place Framework of corporate governance in place WMP2020 change programme agreed information requirements in place for project sign off and commencement Scheme of delegation sets out the requirements around appropriate authorisation Formal recording of decisions takes place WMP’s engagement strategy 	Maintaining	Green
<p>Planning interventions</p> <ul style="list-style-type: none"> Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets. Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered. Considering and monitoring risks facing each partner when working collaboratively, including shared risks. Ensuring arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances. Establishing appropriate performance measures as part of the planning process in order to assess and inform how the performance of the services and projects is to be measured. 	<ul style="list-style-type: none"> Medium term financial plan approved as part of budget 2021/22 Annual process to update MTFP Plans in the place across the Force and PCC. This is for specific priorities within the police and crime plan Performance reports highlight areas where corrective action is necessary. These areas are followed up and reported on Performance targets are detailed in the police and crime plan Strategy and Direction function established in the Force Communication and engagement strategies developed for sub plans that reflect the nature of the initiative Budgets are aligned to specific priorities 	Improving	Green

<ul style="list-style-type: none"> • Ensuring capacity exists to generate the information required to review service quality regularly. • Preparing budgets in accordance with government funding announcements, organisational objectives, strategies and the medium term financial plan. • Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure, together with estimates of grant, precept, and other income streams, aimed at developing a sustainable funding strategy. 	<ul style="list-style-type: none"> • Risk strategies in place and the management of risk is aligned to the strategy 		
<p>Optimising achievement of intended outcomes</p> <ul style="list-style-type: none"> • Ensuring the medium term financial strategy integrates and trades off service priorities, affordability, and other resource constraints. • Ensuring that the budgeting process is all inclusive, taking into account the full cost of operations over the medium and longer term. • Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for the outcomes to be achieved while optimising resource usage. • Ensuring the achievement of 'social value' through service planning and commissioning. 	<ul style="list-style-type: none"> • Medium term financial plan and annual budget aligned to police and crime plan and other strategies • Invest to save proposals developed to achieve the priorities of the police and crime plan • Evidence available of results; for example investment in police officers, decision around Police Community Support Officers • Scheme of delegations in place • Medium Term Financial Plan is discussed at Police and Crime Panel • Surveys completed by force on residents • Strategic policing requirement and strategic assessment completed and presented to Strategic Policing and Crime Board • Updated procurement strategy includes social value. Also work ongoing to embed social value further • Each district has a CSP plan. Attendance by Force and PCC representatives 	Maintaining	Green

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Developing the entity's capacity</p> <ul style="list-style-type: none"> • Reviewing operations, performance and asset management on a regular basis to ensure their continuing effectiveness. • Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how policing resources are allocated so that defined outcomes are achieved effectively and efficiently. • Recognising and promoting the benefits of collaborative working where added value can be achieved through partnerships. • Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources. 	<ul style="list-style-type: none"> • Workforce plan in place and being developed further • Recruitment of additional officers and staff taking place as part of the national uplift programme and extra 200 officers through the police precept and efficiencies • HMICFRS police effectiveness, efficiency and legitimacy programme (PEEL) assessments. Effectiveness 2019 rates the extent to which the force operates efficiently and sustainably is good. • WMP2020 has introduced significant change External and internal assurance work was undertaken • Performance monitoring of operations and activities ongoing • Collaboration arrangements in place with neighbouring forces for significant services areas • Benchmarking activity being undertaken with Audit Committee by the Force • Increased investment in Human Resources function • Partnership approach to sharing assets 	Improving	Green

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Developing the capability of the entity's leadership and other individuals</p> <ul style="list-style-type: none"> • Developing protocols to ensure that elected and appointed leaders negotiate their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained. • Publishing a statement that specifies the types of decisions delegated and those reserved for the collective decision making of the governing body. • Ensuring the PCC and chief officers have clearly defined and distinctive leadership roles within a structure whereby the chief officers lead by implementing strategy and managing the delivery of services and other outputs set by the PCC and/or chief constable, and each provides a check and balance for each other's responsibility. • Developing the capabilities of the PCC and chief officers to achieve effective shared leadership where appropriate, and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks. • Ensuring the PCC, chief officers and staff receive appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged. • Ensuring that the PCC, chief officers and staff have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis. 	<ul style="list-style-type: none"> • Job descriptions in place • PCC, Chief Executive and Chief Constable have established communication processes in place • Scheme of governance in place across both corporations that is reviewed annually • Respective roles clearly defined • Staff appraisals process in place that identifies training requirements • Staff appraisal includes review of staff performance • Investment in the People and Organisational Development department • Strategic Policing and Crime Board • Register of interests • The website of the PCC and Force are reviewed for effectiveness. This includes developing new functionality • Staff survey regularly completed • Briefings undertaken for prospective candidates • Induction processes • People Strategy • The Chief Constable continues to host a number of senior leadership events to develop the capability of its leadership at all levels within the organisation. • Health and wellbeing agenda 	Maintaining	Green

<ul style="list-style-type: none"> • Ensuring personal, organisation and system-wide development through shared learning, including lessons learnt from governance failures both internal and external. • Ensuring the PCC is independent of management and free from relationships that would materially interfere with its role. • The OPCC, in conjunction with the force, should ensure that appropriate information is available for potential PCC candidates. • Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections. • Holding staff to account through regular performance reviews which take account of training or development needs. • Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing. 			
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PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Managing risk</p> <ul style="list-style-type: none"> Recognising that risk management is an integral part of all activities and must be regarded as a continuous process. Implementing robust and integrated risk management arrangements and ensuring that they are working effectively. Ensuring that responsibilities for managing individual risks are clearly allocated. Ensuring that the organisation is risk aware and that its risk appetite is defined and communicated clearly to those responsible for making decisions. 	<ul style="list-style-type: none"> Approved risk strategies in place Risks managed through agreed risk processes Risk registers reviewed on a regular basis Risk strategy and registers scrutinised by Audit Committee Business continuity plans in place Forces revised approach to risk management Change programme risk framework 	Maintaining	Green
<p>Managing performance</p> <ul style="list-style-type: none"> Monitoring service delivery effectively including planning, specification, execution and independent post implementation review. Making decisions based on relevant, clear, objective analysis and advice, pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook. Ensuring an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the organisation’s performance and that of any organisation for which it is responsible. Providing the PCC and chief officers with regular reports on service delivery plans and on progress towards outcome achievement. 	<ul style="list-style-type: none"> Oversight and ownership by PCC and/or chief officers of the performance of organisations Regular performance reports to Strategic Police and Crime Board Regular reporting to the independent audit committee Publication of relevant reports from the force to the PCC, supported by minutes of public forums attended by both the PCC and the chief constable Reports and minutes of the force chief officer board or equivalent Performance management systems, targets and reports 	Maintaining	Green

<ul style="list-style-type: none"> • Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements). 	<ul style="list-style-type: none"> • Benefits realisation plans and monitoring reports • Grant monitoring returns and assessment meetings • HMICFRS reports • External scrutiny of performance by bodies such as the police and crime panel • The budget and medium term financial planning processes • Business plans 		
<p>Robust internal control</p> <ul style="list-style-type: none"> • Aligning the risk management strategy and policies on internal control with achieving the organisation's objectives. • Evaluating and monitoring the organisation's risk management and internal control on a regular basis. • Ensuring effective counter fraud and anti-corruption arrangements are in place. • Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor. • Ensuring an independent audit committee or equivalent group or function, which is independent of the executive and accountable to the PCC and chief constable, provides a further source of effective assurance regarding arrangements for managing risks and maintaining an effective control environment and that its recommendations are listened to and acted upon. 	<ul style="list-style-type: none"> • Framework of corporate governance, including contract standing orders and financial regulations • Fraud and corruption policy that is reviewed on a regular basis • Regular reporting to Audit Committee by professional standards department on cases of any fraud • Commissioner's Strategic Policing and Crime Board receives regular reports on the Professional Standards Department • Financial standards guidance • Risk management strategy • Risk management strategy/policy has been formally approved and adopted and is reviewed and updated on a regular basis • Compliance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA, 2014) 	Maintaining	Green

	<ul style="list-style-type: none"> • Effective internal audit service is resourced and maintained • Independent audit committee complies with best practice as outlined in Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA, 2018) including terms of reference, membership and training • Annual assurance statement produced by audit committee • External audit reports • Internal audit charter, planned external inspection of Internal Audit – International Internal Audit Standards 		
<p>Managing data</p> <ul style="list-style-type: none"> • Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data. • Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies. • Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring. 	<ul style="list-style-type: none"> • Role of the chief information officer defined • Data protection policies and strategies in place • Compliance with policies and strategies including the specified information requirements • Publication strategies • Information sharing protocols • Reports on the activity of the force crime registrar reviewed by Joint Audit Committee • Freedom of Information Act 2000 arrangements • Complaints received records • Partnership protocols and agreements. • Project plans and implementation plans for General Data Protection Regulations • Investment in Force IT systems 	Maintaining	Amber

<p>Strong public financial management</p> <ul style="list-style-type: none"> • Ensuring financial management supports both long term achievement of outcomes and short term financial and operational performance. • Ensuring well developed financial management is integrated at all levels of planning and control, including management of financial risks and controls. 	<ul style="list-style-type: none"> • HMICFRS assessments and recommendations • Internal audit reports • Annual financial strategy • Budget monitoring reports • Annual statement of accounts • Treasury management strategy and monitoring reports • Annual audit letter • Receipt of unqualified audit opinion and VfM conclusion • Plans in place to implement improvements in system effectiveness • Reserves Strategy • Benefit Realisation plans • HMICFRS Value for Money Profile • CIPFA Financial Management Capability Review • Assessment completed against CIPFA's FM code 	<p>Maintaining</p>	<p>Green</p>
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PRINCIPLE G: IMPLEMENTING GOOD PRACTICES IN TRANSPARENCY, REPORTING, AND AUDIT TO DELIVER EFFECTIVE ACCOUNTABILITY

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
<p>Implementing good practice in transparency</p> <ul style="list-style-type: none"> • Writing and communicating reports for the public and other stakeholders in an understandable style appropriate to the intended audience and ensuring they are easy to access and interrogate. • Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand. 	<ul style="list-style-type: none"> • Annual report • Standard decision report template is used consistently • Information published on the website in accordance with the Elected Local Policing Bodies (Specified Information) Order 2011 • Statement of accounts and AGS • Reports to the police and crime panel • Publication (subject to confidentiality tests) of force board papers • Publication (subject to confidentiality tests) of reports presented to the PCC's board • PCC received an award for transparency 	Maintaining	Green
<p>Implementing good practices in reporting</p> <ul style="list-style-type: none"> • Reporting at least annually on performance, value for money, and the stewardship of resources to stakeholders in a timely and understandable way. • Ensuring the PCC and chief officers own the results. • Assessing the extent to which the organisation is applying the principles contained in the Framework and publishing the results of this assessment including an action plan for improvement and evidence to demonstrate good governance in action (the AGS). • Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other similar entities. 	<ul style="list-style-type: none"> • Formal annual reports • Annual financial statements • Appropriate approvals • HMICFRS assessments and responses • The external auditor's annual letter • Action plans to deal with specific matters • Annual governance statement • The PCC and force websites • Reports to the police and crime panel. 	Maintaining	Green

<ul style="list-style-type: none"> • Ensuring that the Framework is applied to jointly managed functions as appropriate. 			
<p>Assurance and effective accountability</p> <ul style="list-style-type: none"> • Ensuring that recommendations for corrective action made by external audit are acted upon. • Ensuring an effective internal audit service, with direct access to the PCC, chief constable and audit committee, provides assurance with regard to the organisation's governance arrangements, and produces recommendations which are acted upon. • Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations as appropriate. Gaining assurance on risks associated with delivering services through third party suppliers and that this is evidenced in the AGS. • Ensuring that when working in partnerships, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met. 	<ul style="list-style-type: none"> • External Audit recommendations implemented • Evidence that recommendations have informed positive improvements • Compliance with the CIPFA Statement on the Role of the Head of Internal Audit • Publication of responses to HMICFRS assessments and recommendations • Community engagement strategy • Collaboration agreements, including effective governance arrangements • External audit reports including the annual letter • Change governance structures including Organisational Change Board, Design Authority etc • Internal Audit's charting setting out reporting lines across the PCC and WMP • Annual Internal Audit report giving opinion on risk governance and control 	Maintaining	Green