



#### **AGENDA ITEM 11**

## JOINT AUDIT COMMITTEE 30 June 2022

#### 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 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 2021/22. 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 2021/22 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 corporation's 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 an exercise was undertaken of the governance arrangements of the PCC by using CIPFA's seven principles of good governance in policing. This assessment is including in the Appendix of the Police and Crime Commissioner's Annual Governance Statement.
- 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 2021/22, as attached at *Appendix A*.

Mark Kenyon
Chief Finance Officer
Police and Crime Commissioner



Appendix A (1)

# Police and Crime Commissioner West Midlands Annual Governance Statement

Position as at 31st March 2022 including plans for the financial year 2022/23



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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.

#### 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 <a href="https://www.westmidlands-pcc.gov.uk">www.westmidlands-pcc.gov.uk</a> or can be obtained by contacting the Commissioner's office, details at <a href="https://www.westmidlands-pcc.gov.uk/contact">https://www.westmidlands-pcc.gov.uk/contact</a>. 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

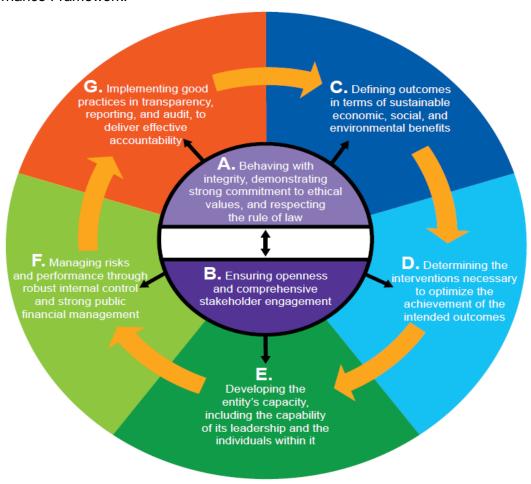
The governance framework comprises the systems and processes, and the culture and values by which the Commissioner directs and controls his activities through which he accounts to and engages with the community. It enables the Commissioner to monitor the achievement of his strategic objectives and to 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 2021 2025 sets out the 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.
- 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.
- 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.
- 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

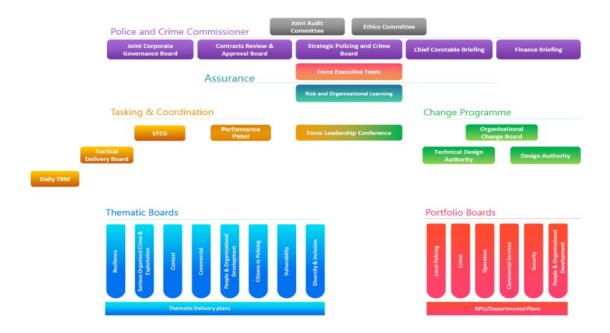


- Procedure rules, policies and internal management processes are established for Financial Management, Procurement, Health and Safety, Confidential Reporting ("Whistleblowing")', Complaints Handling, Anti-Fraud, Bribery and Corruption and Records Management, including security of information and information 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 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.
- The PCC has a Corporate Risk 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.



- 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 current 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.

Every 5 years 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. In line with the five-year cycle, Internal Audit will be assessed against PSIAS during 2022/23.

During 2021/22 Internal Audit continued the approach of concentrating on the major risks faced by the PCC and the Force. The 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 initial Internal Audit plan agreed for 2021/22 was changed during the year to incorporate new risks areas and remove audits where the risks had significantly reduced.

#### 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



#### • Mapping of Governance Framework

To review the effectiveness of the Commissioner's governance arrangements an assessment was undertaken using a governance dashboard and applying CIPFA's seven principles of good governance in policing. The results of this assessment are detailed in the Appendix to this statement. It can be seen all areas are maintaining in terms of status. Also, with the exception of managing data all areas have a green RAG status. Managing Data is amber due to the continued embedding of WMP's IT systems across the organisation.

#### 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 fourforce collaboration agreement (Staffordshire, Warwickshire, West Mercia and West Midlands).
- 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.
- An agreement with Birmingham Airport for WMP to provide policing services to the airport.
- 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.
- A collaboration with Warwickshire PCC where WMP delivers Forensic Services to Warwickshire Police.

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.

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 self-assessment compliance review of the CIPFA FM Code has been completed across the PCC and Force in 2021/22 for the second consecutive year following the introduction of the code in 2020/21. 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 2022/23 to improve and enhance financial accountability through reinforcement of roles and responsibilities, formalised training and enhanced financial reporting. The enhanced financial reporting will include data on policing performance and outcomes against financial information to enhance operational decision making.

#### 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.



COVID-19 continued to impact on the operations of WMP and Office of the Police and Crime Commissioner during 2021/22. The Commissioner continued to ensure both organisations were operating effectively during the pandemic. This included the following:

- 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 continued to have structures in place to ensure the above areas were being delivered during COVID-19. This included meetings of the Strategic Policing and Crime Board where the Force have been held to account. Throughout 2021/22 employees of the OPCC worked from home when required and had the necessary equipment to undertake their roles.

During 2021/22 Internal Audit completed a review of Rape and Serious Sexual Offences (RASSO) investigations. The review identified that officers were not appropriately trained based on the College of Policing's guidance. This included gaps in the training undertaken. Also, delivery plans covering the core work of the team were not monitored effectively. In addition, there were findings of the review that related to the completion of documentation when police officers consult victims. The review also highlighted the high caseload for officers working with RASSO which impacts on the quality and timeliness of investigations. This finding relates to the overall numbers of investigators across the Force to undertake complex investigations which means the Force has insufficient resources to meet demand.

An Internal Audit completed in 2021/22 of the arrangements in place to manage Domestic Abuse investigations had similar findings to the RASSO audit. This included insufficient trained and experienced investigators, lack of supervision, gaps in victims contact and scarce management information. High volume workloads were also of concern, impacting not only on officer welfare but also potentially on victim attrition.

An audit of Detained Property was also completed in 2021/22 which identified several areas for improvement. These included procedures not being followed by officers and staff for handling detained property, no performance reporting to senior management in relation to the property store and there are a large number of missing items from the store.

All the findings from Internal Audit's referred to above were reported to the Joint Audit Committee during 2021/22. Internal Audit will complete follow up work to report on the implementation of agreed recommendations.



The PCC continues to receive financial support from Home Office in relation to legal claims from the Hillsborough disaster. This is through the Special Grant scheme operated by the Home Office.

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.

#### 9 Delivering the Police and Crime Plan

During 2021/22 a new police and crime was developed covering the period up to 2025. A delivery plan has been produced to ensure delivery of the plan. This 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

Progress has been made on addressing the issues raised in the AGS for 2020/21. This includes the following: -

- Internal Audit completed a follow up review of the Missing Persons audit that was originally undertaken in October 2019. The review confirmed 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 follow up review concluded that there was no change in the minimal assurance opinion or recommendation ratings at this time. However, the Force in 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. Internal Audit have recently completed a further follow up audit and there is now only 1 outstanding recommendation which is currently being progressed with stakeholders.
- Continuing to work with WMP to deal effectively with the COVID-19 crisis. This includes WMP's governance framework that has been put in place to deliver against local and national objectives to deal with impacts of the pandemic on policing.



- Management actions have been implemented in relation to Internal Audit recommendations including follow ups by the Internal Audit service.
- The continued implementation and embedding of new systems by WMP to replace legacy systems.
- The Commissioner has continued to hold WMP's Chief Constable to account where reductions in funding have had potential impact on business as usual activities of the Force.

#### 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 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 the Government's review of PCCs.
- The continued implementation of an Estates strategy that was approved by the Commissioner in November 2022. This includes the investment in new facilities and releasing vacant properties.
- The Commonwealth Games in July 2022. This is a unique event and there are complex governance structures in place with the Chief Constable having overall responsibility for the security of the games.
- The green agenda including implementing WMP's environmental strategy.
- 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.
- Responding to government initiatives including devolution and the Levelling Up Agenda.
- Changes in the Policing Protocol.

#### 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

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

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



**Appendix** 

# Mapping of Governance Framework Key Elements / Governance Dashboard – 2021/22 – 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	RAG Status
		of Travel	0
Behaving with Integrity		Maintaining	Green
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.	<ul> <li>PCC code of conduct</li> <li>Standards of professional behaviour, Force policy</li> <li>Performance appraisal process in place for all staff across the PCC and Force (WMP Conversations and Ratings)</li> <li>Evidence of communicating shared values with staff, the community and partners. This is</li> </ul>		
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.	through the Police and Crime Plan, Force strategies (This Work Matters) etc.  • Establishment of a Standards and Employee Relations subgroup at the Force  • Ethics Committee  • Decision making policies in place. Scheme of		
Leading by example and using above standard operating principles or values as a framework for decision making and other actions.	governance details the requirements around decisions  • Police and Crime Plan (2021-25) developed in		
Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are	consultation with partners, including local authorities, Police and Crime Panel, community engagement. Police and Crime Plan the driver for decisions. Emergency chapter developed during		



7		
reviewed on a regular basis to ensure that they are	2020 to cover COVID-19. Emergency chapter	
operating effectively.	used to hold WMP to account.	
	HMICFRS police effectiveness, efficiency and	
	legitimacy programme (PEEL) assessment in	
	2021/22 of the Force. Inspection rated 5 areas as	
	good, 3 adequate and 3 requiring improvement.	
	No areas were rated as inadequate.	
	Professional Standards Dept, reports to Strategic	
	Policing and Crime Board (SPCB) and Joint Audit	
	Committee on fraud and corruption	
	Anti-fraud and corruption policy reviewed	
	regularly and communicated with SPCB 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	
	Adoption of the RACE (Reporting Action	
	Composition Education) Code developed by Karl	
	George	
	The Force's People Strategy	
	Fairness and Belonging plan	
	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	



Demonstrating strong commitment to ethical values  • Seeking to understand, monitor and maintain the	<ul> <li>There is evidence of changes/improvements as a result of complaints received and acted upon</li> <li>There are policies and procedures in place across the organisations setting out the expectations for staff to meet the required standards</li> <li>The expectations the organisations place on suppliers is set out in tender and contract documentation</li> <li>Policy in place for declaring interests for board members, police officers and staff</li> <li>Code of conduct in operation</li> </ul>	Maintaining	Green
<ul> <li>Seeking to understand, monitor and maintain the organisation's ethical performance.</li> <li>Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation.</li> <li>Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values.</li> <li>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.</li> </ul>	<ul> <li>Professional standards monitoring</li> <li>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</li> <li>For major PCC decisions consultation takes place with Board members</li> <li>The policies and procedures of the organisation set out the expectations to meet the required standards</li> <li>Procurement strategy in place. Progress on delivery of the strategy reported on yearly. The strategy includes requirements relating to Social Value</li> <li>Social Value Portal introduced to monitor and report on achievement of social value</li> <li>Appraisal approach includes expected behaviours of suppliers and providers</li> <li>Modern Slavery statement in place and procedures for monitoring suppliers and providers</li> </ul>		
Respecting the rule of law	Police and Crime Plan in place following extensive consultation	Maintaining	Green



•	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.

#### 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. This includes oversight by the Joint Audit Committee
- Internal Audit function, delivery of a risk-based plan
- Legal implications considered as part of decisionmaking process
- Joint Audit Committee complies and follows CIPFA's best practice guidance

#### PRINCIPLE B - ENSURING OPENNESS AND COMPREHENSIVE STAKEHOLDER ENGAGEMENT

Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
Openness		Maintaining	Green
Ensuring that the PCC, chief officers and staff	PCC annual report produced		
behave with integrity and lead a culture where	Up to date publication scheme		
acting in the public interest is visibly and consistently demonstrated thereby promoting and	Precept leaflet produced		
upholding the reputation of the organisation among its stakeholders.	Effect PCC website and Force website revised and improved		
Ensuring the PCC and chief officers lead in establishing specific standard operating principles or	Record of PCC decisions published on website		
values for their organisations and staff and that they are communicated and understood. The values	Established PCC processes and procedures for decisions in relation to grant funding		



should build on the Nolan Principles and the Code of Ethics.	activity (including victims fund etc). This includes publication on website		
<ul> <li>Leading by example and using above standard operating principles or values as a framework for decision making and other actions.</li> <li>Demonstrating, communicating and embedding the standard operating principles or values through</li> </ul>	Strategic Policing 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		
appropriate policies and processes which are reviewed on a regular basis to ensure that they are	PCC decision making policy published on website		
operating effectively.	Reports include legal and financial comments		
	Decision making reports produced for PCC decisions		
	Police and Crime Plan consultation		
	Workplan for Strategic Policing and Crime Board and Joint Audit Committee		
	Precept survey undertaken		
	Active Citizens programme		
	FOI publication scheme		
	Independent Advisory Groups		
	Independent Scrutiny Panels for key policy areas		
Engaging comprehensively with institutional stakeholders	Communication strategy for the PCC and Force developed and implemented	Maintaining	Green
Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended	Collaborations agreements in place with neighbouring PCCs		
outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably.	Working with organisations as part of the Serious Violence Duty		



<ul> <li>Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively.</li> <li>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.</li> </ul>	<ul> <li>Collaboration with the West Midlands         Combined Authority</li> <li>Partnerships developed for particular priorities         for example violence reduction unit, criminal         justice board and victims commission</li> <li>Community Safety partnerships both with the         7 local authorities and the creation of a West         Midlands wide Community Safety partnership</li> <li>Leading on national procurement initiatives         and engaged with Blue Light Commercial</li> <li>Working with the Police and Crime Panel</li> </ul>		
<ul> <li>Engaging with individual citizens and service users</li> <li>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.</li> <li>Ensuring that communication methods are effective and that the PCC and officers are clear about their roles with regard to community engagement.</li> <li>Encouraging, collecting and evaluating the views and experiences of communities, citizens, service</li> </ul>	<ul> <li>Record of public consultations</li> <li>Community safety plans developed in line with the police and crime plan</li> <li>WMP's contact strategy and engagement with communities including surveys</li> <li>Policing strategic assessment</li> <li>Police and Crime Plan</li> <li>Medium Term Financial Plan</li> <li>Recognition of the strategic policing requirement</li> <li>Active Citizen Programme and the operation of the Helping Communities Fund</li> </ul>	Maintaining	Green
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.	Development and operation of the Citizen Charter		



Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity.		
<ul> <li>Taking account of the interests of future generations of taxpayers and service users.</li> </ul>		

### PRINCIPLE C: DEFINING OUTCOMES IN TERMS OF SUSTAINABLE ECONOMIC, SOCIAL AND ENVIRONMENTAL BENEFITS

E	xpected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
	efining outcomes  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	<ul> <li>Police and Crime Plan used as a basis for planning</li> <li>Community engagement and involvement in the development of the Police and Crime Plan</li> <li>Police and Crime Plan delivery plan, linked to workplan</li> <li>Chief Constables ambition and delivery plan (This Work Matters)</li> <li>Force Management Statements</li> <li>Needs assessments across the Violence Reduction Unit, Community Safety</li> </ul>		Green
	basis within the resources that will be available, while recognising that changing and unforeseen demands will place additional pressure on financial resources.	Partnerships and Victims Services     Strategic tasking and coordination     Progress reports against police and crime plan		
•	Identifying and managing risks to the achievement of outcomes as part of delivering goods and services.	<ul> <li>Performance reports considered by the SPCB</li> <li>PCC and CC meetings consider performance of Force</li> <li>Needs assessments completed by the V</li> </ul>		



Managing expectations effectively with regard to determining priorities and making the best use of the resources available.	<ul> <li>WMP's performance panel challenges the performance of the Force</li> <li>Established performance measures and report regularly</li> <li>Medium term financial plan</li> <li>Strategic policing requirement</li> <li>Acting on HMICFRS assessments and recommendations. Recommendation tracker in place and reporting to Joint Audit Committee</li> <li>Established risk management strategy and monitor of risks</li> </ul>		
<ul> <li>Sustainable economic, social and environmental benefits</li> <li>Considering and balancing the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about services.</li> <li>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</li> <li>Ensuring fair access to services.</li> </ul>	<ul> <li>Capital programme aligned to Police and Crime Plan and This Work Matters</li> <li>Record of decisions made</li> <li>Programme governance structures in place including appropriate gateways, outline business case, detailed business cases and other gateways where necessary</li> <li>PCC economic strategy</li> <li>Social value considered in the procurement and commissioning of goods and services</li> <li>The generation of social value assessed in the disposal of land and buildings</li> <li>Commitments in the police and crime plan in relation to social value, environment and access to police services</li> <li>Joint environmental strategy to be launched during 2022</li> </ul>	Improving	Green



### 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
<ul> <li>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.</li> <li>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.</li> </ul>	<ul> <li>Decision making framework in place</li> <li>Framework of corporate governance in place</li> <li>WMP's programme structures in place. This includes agreed information requirements in place for project sign off and commencement</li> <li>Scheme of delegation sets out the requirements around appropriate authorisation</li> <li>Formal recording of decisions takes place</li> <li>WMP's Citizens Charter and engagement strategy</li> <li>PCC Commissioning Strategy</li> <li>Needs assessments across the Violence Reduction Unit, Community Safety Partnerships and Victims Services</li> </ul>	Maintaining	Green
Planning interventions  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.	<ul> <li>Medium term financial plan approved as part of budget 2022/23</li> <li>Annual process to update MTFP</li> <li>Plans in the place across the Force and PCC. This is for specific priorities within the police and crime plan</li> </ul>	Improving	Green



<ul> <li>Considering and monitoring risks facing each partner when working collaboratively, including shared risks.</li> <li>Ensuring arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances.</li> <li>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.</li> <li>Ensuring capacity exists to generate the information required to review service quality regularly.</li> <li>Preparing budgets in accordance with government funding announcements, organisational objectives, strategies and the medium-term financial plan.</li> <li>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</li> </ul>	<ul> <li>Performance reports highlight areas where corrective action is necessary. These areas are followed up and reported on</li> <li>Performance targets are detailed in the police and crime plan</li> <li>Strategy and Direction function providing assurance</li> <li>Communication and engagement strategies developed for sub plans that reflect the nature of the initiative</li> <li>Budgets are aligned to specific priorities</li> <li>Risk strategies in place and the management of risk is aligned to the strategy</li> <li>Estates strategy approved in 2021. Delivery and financial plan</li> </ul>		
streams, aimed at developing a sustainable funding strategy.			
Optimising achievement of intended outcomes	<ul> <li>Medium term financial plan and annual budget aligned to police and crime plan and other strategies</li> </ul>	Maintaining	Green
<ul> <li>Ensuring the medium-term financial strategy integrates and trades off service priorities, affordability, and other resource constraints.</li> </ul>	Delivery plan details actions against the police and crime plan. Includes assessment of budget requirements		
<ul> <li>Ensuring that the budgeting process is all inclusive, taking into account the full cost of operations over the medium and longer term.</li> </ul>	or buuget requirements		



•	Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the	•	Evidence available of results; for example, investment in police officers, decision around Police Community Support Officers	
	external environment that may arise during the budgetary period in order for the outcomes to be	•	Scheme of delegations in place	
	achieved while optimising resource usage.	•	Medium Term Financial Plan is discussed at Police and Crime Panel	
•	Ensuring the achievement of 'social value' through service planning and commissioning.	•	Surveys completed by Force on residents through Citizens charter	
		•	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	

### 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
Developing the entity's capacity		Improving	Green
Reviewing operations, performance and asset management on a regular basis to ensure their	Force workforce plan in place which is continuously updated		
continuing effectiveness.	Recruitment of additional officers and staff		
Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how	taking place as part of the national uplift programme and extra 200 officers through the police precept and efficiencies		
and other options in order to determine now	HMICFRS police effectiveness, efficiency and legitimacy programme (PEEL)		



<ul> <li>policing resources are allocated so that defined outcomes are achieved effectively and efficiently.</li> <li>Recognising and promoting the benefits of collaborative working where added value can be achieved through partnerships.</li> <li>Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources.</li> </ul>	<ul> <li>assessments. Effectiveness 2021 rates use of resources as good. It rates developing a positive workspace as adequate</li> <li>Performance monitoring of operations and activities ongoing</li> <li>Collaboration arrangements in place with neighbouring forces for significant services areas</li> <li>Value for money exercises completed by WMP on the costs of police services and reported to Joint Audit Committee</li> <li>Learning and Development implementation</li> <li>Partnership approach to sharing assets</li> <li>Collaboration playbook developed to provide a gateway mechanism when entering into collaboration arrangements</li> <li>WMP's talent management initiatives</li> <li>WMP's Conversations - performance framework in operation</li> </ul>		
Expected Behaviours & Outcomes	How the Requirements Are Met	Direction of Travel	RAG Status
Developing the capability of the entity's leadership and other individuals  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.	<ul> <li>Job descriptions in place</li> <li>PCC, Chief Executive and Chief Constable have established communication processes in place</li> <li>Scheme of governance in place across both corporations that is reviewed annually</li> </ul>	Maintaining	Green



- 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.
- Ensuring personal, organisation and system-wide development through shared learning, including lessons learnt from governance failures both internal and external.

- Chief Constable recruitment process programme managed
- Respective roles clearly defined
- Regular one to one meetings held between staff and their managers across the OPCC
- 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
- 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
- PCC induction
- WMP's talent management initiatives
- Programme structures in place to recruit a new Chief Constable



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.
<ul> <li>Holding staff to account through regular performance reviews which take account of training or development needs.</li> </ul>
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.

### 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
Managing risk		Maintaining	Green
Recognising that risk management is an integral	Approved risk strategies in place		
part of all activities and must be regarded as a continuous process.	Risks managed through agreed risk processes		
Implementing robust and integrated risk	Risk registers reviewed on a regular basis		
management arrangements and ensuring that they are working effectively.	Risk strategy and registers scrutinised by Audit Committee		



<ul> <li>Ensuring that responsibilities for managing individual risks are clearly allocated.</li> <li>Ensuring that the organisation is risk aware and that its risk appetite is defined and communicated clearly to those responsible for making decisions.</li> </ul>	<ul> <li>Business continuity plans in place</li> <li>Forces revised approach to risk management</li> </ul>		
Managing performance		Maintaining	Green
<ul> <li>Monitoring service delivery effectively including planning, specification, execution and independent post implementation review.</li> </ul>	<ul> <li>Oversight and ownership by PCC and/or chief officers of the performance of organisations</li> </ul>		
Making decisions based on relevant, clear, objective analysis and advice, pointing out the	<ul> <li>Regular performance reports to Strategic Policing and Crime Board</li> </ul>		
implications and risks inherent in the organisation's financial, social and environmental	<ul> <li>Regular reporting to the independent audit committee</li> </ul>		
<ul> <li>position and outlook.</li> <li>Ensuring an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives</li> </ul>	<ul> <li>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</li> </ul>		
before, during and after decisions are made thereby enhancing the organisation's performance and that of any organisation for which it is	<ul> <li>Performance management systems, targets and reports</li> </ul>		
responsible.	Benefits realisation plans and monitoring reports		
<ul> <li>Providing the PCC and chief officers with regular reports on service delivery plans and on progress towards outcome achievement.</li> </ul>	Grant monitoring returns and assessment meetings		
Ensuring there is consistency between	HMICFRS reports		
specification stages (such as budgets) and post implementation reporting (e.g. financial statements).	<ul> <li>External scrutiny of performance by bodies such as the police and crime panel</li> </ul>		
Statements).	<ul> <li>The budget and medium-term financial planning processes</li> </ul>		



	WMP performance panel		
Robust internal control		Maintaining	Green
<ul> <li>Aligning the risk management strategy and policies on internal control with achieving the organisation's objectives.</li> </ul>	Framework of corporate governance, including contract standing orders and financial regulations		
<ul> <li>Evaluating and monitoring the organisation's risk management and internal control on a regular</li> </ul>	Fraud and corruption policy that is reviewed on a regular basis		
<ul> <li>basis.</li> <li>Ensuring effective counter fraud and anti- corruption arrangements are in place.</li> </ul>	Regular reporting to Audit Committee by professional standards department on cases of any fraud		
Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is	Commissioner's Strategic Policing and Crime Board receives regular reports on the Professional Standards Department		
provided by the internal auditor.	Financial standards guidance		
Ensuring an independent audit committee or	Risk management strategy		
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	Risk management strategy/policy has been formally approved and adopted and is reviewed and updated on a regular basis		
managing risks and maintaining an effective control environment and that its recommendations are listened to and acted upon.	Compliance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA, 2014)		
	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		



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	<ul> <li>Annual assurance statement produced by audit committee</li> </ul>		
	External audit reports		
	<ul> <li>Internal audit charter, planned external inspection of Internal Audit – International Internal Audit Standards</li> </ul>		
	<ul> <li>Internal Audit plan that is aligned to the key risks of the organisations</li> </ul>		
Managing data	Role of the Senior Information Risk Owner (SIRO) defined	Maintaining	Amber
Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal	Data protection policies and strategies in place		
<ul><li>data.</li><li>Ensuring effective arrangements are in place and</li></ul>	<ul> <li>Data retention policies in place across the organisations</li> </ul>		
operating effectively when sharing data with other bodies.	<ul> <li>Compliance with policies and strategies including the specified information requirements</li> </ul>		
Reviewing and auditing regularly the quality and accuracy of data used in decision making and	Publication strategies		
performance monitoring.	Information sharing protocols		
	Reports on the activity of the force crime registrar reviewed by Joint Audit Committee		
	<ul> <li>Freedom of Information Act 2000 arrangements</li> </ul>		
	Complaints received records		
	Partnership protocols and agreements.		
	<ul> <li>Project plans and implementation plans for General Data Protection Regulations</li> </ul>		
	Investment in Force IT systems		



	Information produced in relation to the conflict in Ukraine		
Strong public financial management  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	<ul> <li>conflict in Ukraine</li> <li>HMICFRS assessments and recommendations</li> <li>Internal audit reports</li> <li>Annual financial strategy</li> <li>Budget monitoring reports</li> <li>Annual statement of accounts</li> </ul>	Maintaining	Green
of financial risks and controls.	<ul> <li>Treasury management strategy and monitoring reports</li> <li>Annual audit letter</li> <li>Receipt of unqualified audit opinion and VfM</li> </ul>		
	<ul> <li>Receipt of driqualined addit opinion and vitor conclusion</li> <li>Plans in place to implement improvements in system effectiveness</li> </ul>		
	<ul><li>Reserves Strategy</li><li>Benefit Realisation plans</li><li>HMICFRS Value for Money Profile</li></ul>		
	CIPFA Financial Management Capability Review		
	<ul> <li>Assessment completed against CIPFA's FM code</li> </ul>		



## 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
Implementing good practice in transparency	Annual report	Maintaining	Green
Writing and communicating reports for the public and other stakeholders in an understandable style	Standard decision report template is used consistently		
appropriate to the intended audience and ensuring they are easy to access and interrogate.	Information published on the website in accordance with the Elected Local Policing		
<ul> <li>Striking a balance between providing the right amount of information to satisfy transparency</li> </ul>	Bodies (Specified Information) Order 2011 and its revisions		
demands and enhance public scrutiny while not being too onerous to provide and for users to	Statement of accounts and AGS		
understand.	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		
Implementing good practices in reporting	Formal annual reports	Maintaining	Green
Reporting at least annually on performance, value	Annual financial statements		
for money, and the stewardship of resources to stakeholders in a timely and understandable way.	Appropriate approvals		
<ul> <li>Ensuring the PCC and chief officers own the</li> </ul>	HMICFRS assessments and responses		
results.	The external auditor's annual letter		
<ul> <li>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</li> </ul>	Action plans to deal with specific matters		
	Annual governance statement		
	The PCC and force websites		
indicating an action plan for improvement and	Reports to the police and crime panel		



	-		
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.			
Ensuring that the Framework is applied to jointly managed functions as appropriate.			
Assurance and effective accountability	<ul> <li>External Audit recommendations implemented</li> <li>Evidence that recommendations have informed positive improvements</li> </ul>	Maintaining	Green
Ensuring that recommendations for corrective action made by external audit are acted upon.			
<ul> <li>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.</li> </ul>	Compliance with the CIPFA Statement on the Role of the Head of Internal Audit		
	<ul> <li>Publication of responses to HMICFRS assessments and recommendations</li> </ul>		
<ul> <li>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.</li> </ul>	Community engagement strategy		
	<ul> <li>Collaboration agreements, including effective governance arrangements</li> </ul>		
	External audit reports including the annual letter		
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> <li>Change governance structures including Organisational Change Board, Design Authority etc</li> </ul>		
	<ul> <li>Internal Audit's charting setting out reporting lines across the PCC and WMP</li> </ul>		
	<ul> <li>Annual Internal Audit report giving opinion on risk governance and control</li> </ul>		



# 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 <a href="www.west-midlands.police.uk">www.west-midlands.police.uk</a> or can be obtained by contacting us, details at <a href="www.west-midlands.police.uk/contact-us/index.aspx">www.west-midlands.police.uk/contact-us/index.aspx</a>. 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.

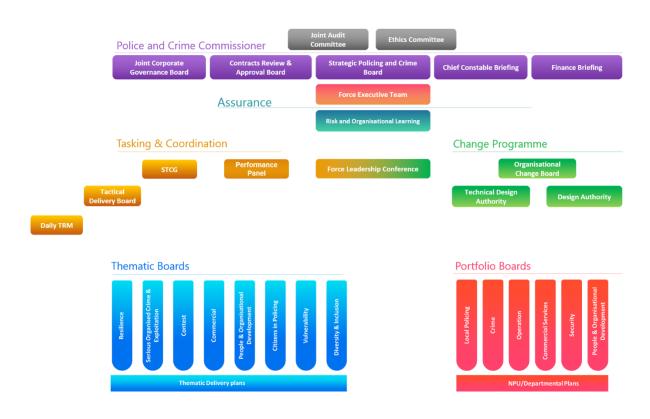
The system of internal control is a significant part of the governance framework and is designed to manage risk. It cannot eliminate all risk of failure to achieve policies, aims and objectives; it can therefore only provide reasonable and not absolute assurance of effectiveness.

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.

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 behaviour 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 2021-2025.
- ✓ 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 webchat 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 WMVRU 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 period 2020-2023. A new corporate strategy will be drafted in
  2022/23 to cover the years ahead.
- ✓ 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 WMP's 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, with the monthly Performance Panel acting as the main oversight body. 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.

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 corporate strategy, a people strategy was launched in 2021 outlining 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 was re-launched in 2021/22 with a focus on measuring and improving our performance to meet the strategic objectives and drive personal, departmental and forcewide deliverables. In early 2022, a talent management framework was added to the WMP Conversations platform, enabling a consistent view across the force of areas of focus for talent development in future years.
- ✓ 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 forcewide 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 'Good'.
- ✓ An in-house automation capability within IT&D continues to deliver forcewide 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.

# 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 Corporate Risk Register, prepared and reviewed by the Deputy Chief Constable and managed via the Force Executive Team Meeting and Risk and 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 forcewide 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 organisation at the monthly Performance Panel meetings.

- ✓ 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
- √ 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 self assessment compliance review of the CIPFA FM Code has been completed across the PCC and Force in 2021/22 for the second consecutive year following the introduction of the code in 2020/21. 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 2022/23 to improve and enhance financial accountability through reinforcement of roles and responsibilities, formalised training and enhanced financial reporting. The enhanced financial reporting will include data on policing performance and outcomes against financial information to enhance operational decision making.

# 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, updated in 2021, 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 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 is available to all staff and officers for access to 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.

## 12. Significant governance issues 2021/22

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 jointly by a Gold Commander (at Assistant Chief Constable level) and Director of Public Health (Solihull council)., 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.

Other significant structures continued including Misconduct Hearings by WMPs Professional

Standards Department.

13. 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

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