



THE CHIEF CONSTABLE OF CLEVELAND

Integrated Offender Management

Internal audit report 16.21/22

FINAL

22 September 2022

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1. EXECUTIVE SUMMARY

Why we completed this audit

Integrated Offender Management (IOM) was introduced in 2009 to bring a cross-agency response to crime and reoffending threats faced by local communities. Following the 2019 Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Police Effectiveness, Efficiency, and Legitimacy (PEEL) inspection, the Force was assessed as inadequate which resulted in it being placed into the national oversight process. To address this, the Force utilises a section on SharePoint to store the monitoring forms used to track delivery of the HMICFRS Areas for Improvement (AFI) and thus monitor the overall implementation of recommendations raised.

To address the outcome of the findings, the Force performed an internal review of its governance and monitoring framework as part of the 'Toward 2025 – the Road to Improvement' programme. As part of this, an October 2020 Integrated Offender Management (IOM) proposal was produced which identified the relevant existing AFIs which could be used to help to shape and support the overarching Road to Improvement programme as part of the vulnerability workstream. IOM later developed into its own workstream managed through the IOM Working Group reporting to the Change and Investment Board, previously the Futures Board, and now which has subsequently moved to a Tasking Group.

At the request of management, our review was focused on the progress and governance of the IOM workstream established to develop the Force's ability to meet the requirements of IOM and address the relevant AFIs noted. Consequently, our review has not included a review of how the Force manages actual IOM cases in practice.

A proposal was made to the Change and Investment Board to close the IOM workstream in April 2022 on the basis that it was believed that the prime objectives been achieved, with outstanding areas becoming part of the new Towards 2025 programme workstreams. The Change and Investment Board deferred closure until August 2022 to enable the new lead, the Head of CID (Criminal Investigations Department) to complete a review of progress and the role of the IOM Working Group. We understand that the workstream has now been closed, subsequent to completion of our fieldwork.

Conclusion

Our review found that the Force had in place a detailed Integrated Offender Management Project Workbook which documented the key elements of its action plan that included governance arrangements, IOM programme arrangements, milestone tracker, and an action log. We were advised that the Force follows the national IOM strategy but, based on the evidence supplied, the governance structure was unclear including out of date Terms of Reference for the IOM Working Group.

As a result of these findings, we have raised **two medium priority** and **one low priority** management actions which have been agreed with management.

Internal audit opinion:

Taking account of the issues identified, the Chief Constable can take **reasonable assurance** that the controls upon which the organisation relies to manage this area are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified area.



Key findings

We identified the following weaknesses which have led to medium priority management actions being raised:



Integrated Offender Management (IOM) Strategy and Partnership Agreements

Through discussion with the Services Improvement Inspector, we were informed that the Force follows the national Integrated Offender Management Strategy. We obtained a copy of the national strategy document, Neighbourhood Crime IOM Strategy published in December 2020. We also received a partnership agreement to support the delivery of IOM, but evidence in relation to this was dated August 2018 without review or any updates since then.

Without up to date partnership agreements in place, there is a risk that the Force is unable to follow the national strategic direction to deliver offender management. Without clearly defined partnership arrangements, there is a risk of ineffective offender management which could impact community safety. **(Medium)**



Integrated Offender Management Working Group

We confirmed that this Group has a Terms of Reference, but we were unable to obtain any evidence that this had been formally approved. We also noted that it does not refer to the POAP (Plan on a Page) and Workbook but to the development of an action plan. It also states that this group reported to the Safeguarding and Vulnerability Delivery Board, which we confirmed it initially did, although we were informed and were supplied with evidence to support that it now reports to the Change and Investment Board. As explained in the Terms of Reference as drafted, IOM was part of the vulnerability workstream with reporting to the Safeguarding and Vulnerability Delivery Board via the SIT (Service Improvement Team). IOM had since been established as a separate workstream within the Towards 2025 programme. Without further clarification, there is a risk that this Group is not performing the functions intended. **(Medium)**

We noted the following controls to be adequately designed and operating effectively:



Integrated Offender Management Working Group

The IOM Working Group uses an Excel Workbook as a joint tool to manage the IOM POAP (Plan on a Page) and, in the absence of meeting minutes, as a means to record actions, issues and decisions identified during meetings.

There was only one issue recorded at the time of our review which had been updated within the last month. Actions were also numbered and dated with an owner. All actions recorded as open had progress updates noted within the last month and all within the expected completion dates with the exception of one with commentary. Although there was no evidence in the form of minutes, we were informed that progress is presented by Stream and Activity Leads with progress agreed within the meeting and updates added to the Milestone Tracker in the comments section including agreement that an activity has been completed with updates in the status column.



IOM Highlight Reports

A bi-monthly highlight report is produced for the IOM Working Group which gives more context to the information recorded within the Workbook and reported to the Change and Investment Board.

We reviewed the reports produced for October and December 2021, and for February and April 2022. We confirmed that the reports contain:

- Summary of activity.
- How activity has been aligned to HMICFRS AFIs.
- Where activity supports the PCC's 10-point plan.

We noted that the summary of each report covered key areas to be covered at the meeting together with an overall RAG rating for the IOM Workstream which, until April 2022, had been recorded as either red or amber, with the exception of the April report where no rating was recorded as, at this point, a request had been submitted for approval for the IOM workstream's closure from the Change and Investment Board.



IOM Workstreams

Using the IOM Workbook, we selected a sample of five workstreams:

- 2: Benchmarking.
- 10: Task Pilot.
- 24: Facial Recognition.
- 30: Established and Agree Controls; and,

- 31: FMS Submission.

By reference to the Highlight reports issued to meetings of the IOM Working Group we confirmed for four of the sample that there was sufficient information to support that they had been completed and closed.

The fifth workstream for facial recognition was put on hold pending a decision of the Change and Investment Board.



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- Where activity supports the PCC's 10-point plan.

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Change and Investment Board (formally Futures Board)

We confirmed from the Terms of Reference for the Change and Investment Board that it had clearly set out responsibilities. These included oversight of the Force change programme including new projects, with monitoring delivery through to business-as-usual and the achievement of benefits. We confirmed that this Board is chaired by the Deputy Chief Constable and has responsibility to report as necessary risks and issues to the Executive Management Board. We noted that this Board's Terms of Reference were produced in May 2022 following a review of governance and replaced the former Futures Board. Although the Change and Investment Board does not keep minutes of meetings, a decision and action log is maintained, this included decisions to close workstreams as completed.



Change and Investment Board Progress Reports

We confirmed from our review of progress reports issued to the Change and Investment Board for September 2021, February, April and June 2022 that this Board has oversight of the Towards 2025 Programme designed to implement service improvements. It supports the Force vision 'Delivering outstanding policing for our communities' together with the Force's priorities and values and includes the IOM workstream.

We confirmed that this is produced by the Services Improvement Team quarterly and covers each of the Towards 2025 workstreams.

We found that the IOM workstream updates were captured by exception within the reports and that assessments of progress were RAG rated.

We noted that the red status for Towards 2025 was due to the requirement for investment and in June 2022 the Board was asked to consider a high-level business case to be progressed into the Executive Board for an investment decision to deliver the benefits and reduce the risk rating for each workstream. We noted that assessments of progress were RAG rated, with the overall assessment across these three reports being amber or red.



IOM Workstream Closure

We confirmed that an IOM closure report was presented to the Change and Investment Board in April 2022 which we confirmed from the action and decision log was declined. The report set out a summary of the current IOM plan and categorised the position of each under the following headings:

- Completed and evidence gathered to confirm sign off.
- De-scoped during stage two with rationale for decision.
- Continuing support from SIT stage three as part of a wider engagement workstream.
- Transfer to Business-as-Usual (BAU) requirements needed. Discussion of ownership and future role of Board are actions for consideration and agreement.

The closure report stated that the workstream, when planned, was targeted to work with supervisors and senior leaders across the Force to identify key risks and where the process would benefit from improvement as well as attempting to address HMICFRS Areas for Improvement (AFI), in particular the need for join up across all IOM strands to prioritise and manage harmful offenders.

It also stated that the benefits of the workstream had predominantly been focused on HMICFRS improvement areas which had also been updated and will be tested by the next PEEL inspection. IOM would no longer remain a separate workstream due to the scale of improvement work reported through the closure report.

We confirmed in discussion with the Project Manager that, as part of the development of the planning process, the one remaining area of IOM would be part of the new Frontline Knowledge, Skill & Practice workstream.

The decision of the Change and Investment Board to decline closure was because the new lead Superintendent had requested some time to develop an understanding of the work completed and the role of the IOM Working Group.

Therefore, the IOM workstream would seek closure at the next Change Board and Investment Board in August 2022. We have been advised, following completion of our fieldwork, that it has now been closed.



Change Programme

The FMS (Force Management Statement) is a review of the Force's demand on services and resources available to meet that demand. As such it is the foundation of the Force's financial and business planning process including change programmes that enable the Force to make better use of resources and meet demand.

The change elements of the Force's plans were brought together within the Towards 2025 programme.

For the current planning cycle proposals of further development of the planning process had been presented to the Change and Investment Board. We noted that the change elements of the process included the development of business cases with a review of the scope of each workstream, benefits and costs. An assessment of costs and resources for each workstream, timescales and ownership, links to the Commissioner's Police and Crime Plan objectives and HMICFRS Areas for Improvement.

We confirmed that within these workstream, it is planned that the one remaining element of the IOM workstream will be part of the Frontline Knowledge, Skill & Practice workstream.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Area: Integrated Offender Management (IOM) Strategy and Partnership Agreements				
Control	The Force follows the national strategy for Integrated Offender Management (IOM). Partnership agreements have been established to support the local delivery of IOM to reduce crime and reoffending threats faced by local communities.	Assessment:		
		Design	✓	
		Compliance	x	
Findings / Implications	<p>Through discussion with the Improvement Inspector, we were informed that the Force follows the national IOM Strategy. We obtained a copy of the national strategy document, Neighbourhood Crime IOM Strategy published in December 2020. Although we were informed that within the IOM Working Group meeting discussions about alignment to the National Strategy take place.</p> <p>Whilst we received a Partnership Agreement to support the delivery of Integrated Offender Management, evidence in relation to this indicated that this was dated August 2018 without review or any updates since then.</p> <p>Without up to date partnership agreements in place, there is a risk that the Force is unable to follow the national strategic direction to deliver offender management. Without clearly defined partnership arrangements, there is a risk of ineffective offender management which could impact community safety.</p>			
Management Action 1	The Force will ensure that its partnership agreements are revised / re-formed to support offender management.	Responsible Owner:	Date:	Priority:
		CID Superintendent	31 March 2023	Medium

Area: IOM Ownership

Control	To support Integrated Offender Management (IOM), the Force has developed clear lines of responsibilities to ensure its delivery.	Assessment: Design ✓ Compliance ×
Findings / Implications	<p>We confirmed from review of the Workbook and Highlight Reports that leads for each IOM workstream had been identified together with the supporting roles. These individuals were also recorded on the milestone tracker as the Stream and Activity Leads, risks and action owners. Gold and Silver leads were also recorded on the progress reports to the Change Board which is an exception report covering Towards 2025 Improvement Programme as a whole.</p> <p>We confirmed in discussion with the Programme Manager that due to resources available, consistent strategic ownership for IOM and also the workstream (Silver Command Supt) had been an issue within the Force, however the recently appointed Head of CID was now taking a lead role.</p> <p>Without clearly defined roles and responsibilities there is a risk that outcomes for the Integrated Offender Management workstream are not achieved.</p>	
Management Action 2	The Force will introduce a formalised document which clearly captures the roles, responsibilities, and lines of accountability for key staff involved within the future development of IOM practice across the Force (rather than the day to day management of cases).	Responsible Owner: CID Superintendent Date: 31 March 2023 Priority: Low

Area: IOM Working Group				
Control	The IOM Working Group was established to manage and review progress against each of the workstreams within the POAP (Plan on a Page) and recorded within the IOM Workbook. With the purpose to deliver on the agreed proposals resulting from the Safeguarding and Vulnerability Delivery Board and to address AFIs and recommendations Cleveland Police currently hold in relation to IOM.	Assessment:		
		Design		✓
		Compliance		×
Findings / Implications	We confirmed that the Integrated Offender Management Working Group had a Terms of Reference, but we were unable to obtain any evidence that this had been formally approved.			
	We also noted it does not refer to the POAP (Plan on a Page) and Workbook but to the development of an action plan that covers Service Improvement Team (SIT) recommendations, AFIs and further inspection recommendations. It also states that that this group reports to the Safeguarding and Vulnerability Delivery Board, which we confirmed it initially did, although we were informed and were supplied with evidence to support that it now reports to the Futures / Change Board.			
	At the time that the Terms of Reference was drafted, IOM was part of the vulnerability Workstream with reporting to the Safeguarding and Vulnerability Delivery Board, via the SIT (Service Improvement Team). IOM had since been established as a separate workstream within the Towards 2025 programme.			
	We therefore could not use this to assess if the Working Group was fulfilling its remit as this does not accurately cover the responsibilities and activities of this group. Although this is mitigated by the POAP, and Workbook used for their meetings there is a risk that this Group is not performing the functions intended.			
Management Action 3	The IOM Working Group Terms of Reference will be reviewed and updated and approved, ensuring that its purpose, responsibilities and reporting lines are consistent with the requirements of the project and are approved.	Responsible Owner: CID Superintendent	Date: 31 March 2023	Priority: Medium

APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*		Non Compliance with controls*		Agreed actions		
					Low	Medium	High
Integrated Offender Management	0	(7)	3	(7)	1	2	0
Total					1	2	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following area:

Objective of the area under review

The Force has adequate and effective systems and procedures in place for dealing with different types of offenders and offences through a coherent multi-agency response to local crime.

When planning the audit the following areas for consideration and limitations were agreed:

Integrated Offender Management (IOM) is a nationally recognised scheme with guidance produced by the Home Office. It seeks to bring a cross agency response to crime and re-offending threats faced by local communities. It helps to improve the quality of life in communities by:

- Reducing the negative impact of crime and re-offending.
- Reducing the number of people who become victims of crime; and
- Helping to improve the public's confidence in the criminal justice system.

The Force underwent a PEEL Assessment by HMICFRS in 2019 which identified actions were required in respect of its approach to Integrated Offender Management. Since this time, the IOM Unit has created and is currently working through an action plan to bring about improvements to its service delivery. Our review will seek to obtain a "holistic" view of how plan delivery is progressing in order to inform any future changes to the plan and will focus on the following areas:

- Whether the Force has an overall strategy for offender management which aligns with its Policing Plan.
- Whether there are clear lines of responsibility for IOM.
- What IOM governance mechanisms are in place.
- Whether the Force's IOM plan aligns with its Policing Plan and national principles for IOM.
- How delivery of the Force's IOM plan is progressing.
- Whether implementation of actions in the plan have led to service improvements.
- How progress of the IOM plan is being reported upon.

- As part of our review will select a cross-section of plan elements and review them to determine whether:
 - The programme element is on track.
 - Elements considered to be delivered are in place and embedded.
 - Progress, particularly in respect of any delays, is being recorded and reported completely, accurately and on a timely basis.
 - Any variations to plan elements or due dates are subject to appropriate scrutiny and approval.

Limitations to the scope of the audit assignment:

- The scope of this audit is limited to those areas examined and reported upon in the key risks and control objectives in the context of the objective set out for this review.
- Any testing undertaken as part of this audit will be compliance based and sample testing only.
- At the request of management our review is not intended to focus solely on how the Force is handling specific cases against the principles of IOM such as PPO (Prolific Priority Offenders), MARAC (Multi Agency Risk Assessment Conferences) as part of this review, but case management may form part of our audit depending upon the nature of sample actions chosen.
- We will not consider the Force's arrangements for resourcing its IOM approach.
- Our review does not guarantee a particular outcome from any inspection by HMICFRS and nor is it intended to replace any such inspection.
- Our work does not provide an absolute assurance that material errors, loss or fraud do not exist.

Debrief held	8 August 2022
Draft report issued	11 August 2022
Responses received	8 September 2022
Revised draft report issued	13 September 2022
Further comments received	20 September 2022
Further revised draft report issued	21 September 2022
Final report issued	22 September 2022

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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

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