

**JOINT
ANNUAL GOVERNANCE STATEMENT
2019/2020**

**THE POLICE AND CRIME COMMISSIONER FOR GWENT
AND
THE CHIEF CONSTABLE OF GWENT POLICE**

INTRODUCTION

The purpose of this Annual Governance Statement is to explain how the Police and Crime Commissioner (Commissioner) and the Chief Constable of Gwent have complied with their joint Manual of Corporate Governance (MoCG) during 2019/20 and in particular, the Code of Corporate Governance therein.

To this end, the Annual Governance Statement is written in two parts. Part one describes the governance arrangements in place during 2019/20. Part two reports on the review of the effectiveness and the outcomes of these arrangements.

This Annual Governance Statement assesses the governance arrangements in place during the 2019/20 financial year, so the vast majority of the assessment period will be unaffected by the Coronavirus pandemic. Furthermore, the conclusion of the Annual Governance Statement, on whether or not the governance arrangements are fit for purpose, should generally reflect normal operations. However, as the Annual Governance Statement must be current at the time of its publication (normally the 31st July but this may be delayed as a result of the Coronavirus pandemic), any impact on the Governance arrangements from the 1st April 2020 up to the publication date will be reflected.

PART ONE

SCOPE OF RESPONSIBILITIES

The Commissioner and Chief Constable's governance arrangements are designed to ensure appropriate accountability and to assist effective leadership. The Police Reform and Social Responsibility Act 2011 created two separate 'corporations sole' within each police force: the Commissioner and the Chief Constable. They each have clear and separate roles and responsibilities set out in statute.

The core statutory functions of the Commissioner are to secure the maintenance

of the police force; ensure that the force is efficient and effective; and hold the Chief Constable to account for the exercise of her functions and the functions of persons under her direction and control. The Commissioner also has:

- Responsibility for the delivery of community safety and crime reduction;
- The ability to make crime and disorder reduction grants within the force area;
- A duty to ensure that all collaboration agreements with other Commissioners and forces deliver better value for money or enhance the effectiveness of policing capabilities and resilience; and
- A wider responsibility for the enhancement of the delivery of criminal justice locally.

Overarching these functions is a responsibility for ensuring business is conducted in accordance with the law and proper standards; that public money is safeguarded and properly accounted for; and that it is used economically, efficiently and effectively.

The operational independence of the Chief Constable is protected in legislation. She has a statutory responsibility for the control, direction and delivery of operational policing services provided by the Force. The Chief Constable is responsible for ensuring that police powers are exercised in accordance with the law and proper standards and is accountable to the Commissioner for the delivery of efficient and effective policing; management of resources; and expenditure by the police force.

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

The financial management arrangements conform principally with the governance requirements of the Chartered Institute of

Public Finance and Accountancy (CIPFA) *Statement on the Role of the Chief Financial Officer of the Police and Crime Commissioner and Chief Financial Officer of the Chief Constable* and the Home Office *Financial Management Code of Practice for the Police Service of England and Wales (new version issued in July 2018)*. Revised guidance for 'Delivering Good Governance' for Policing Bodies was also published by CIPFA in July 2016 and these have been taken into account both in reviewing our governance arrangements and in preparing this Annual Governance Statement.

This Annual Governance Statement meets the requirements of the Accounts and Audit (Wales) Regulations 2014 in relation to the publication of a Joint Annual Governance Statement which must accompany the Statement of Accounts.

This is the third time that the Commissioner and Chief Constable have jointly produced a single Annual Governance Statement. Much of the governance framework is shared but this Statement highlights the few areas where governance arrangements differ.

PURPOSE OF THE GOVERNANCE FRAMEWORK

The governance framework comprises the systems, processes, culture and values that the Commissioner and Chief Constable use to direct and control their activities, and to engage with and be accountable to the community. The framework enables them to influence and monitor the achievement of strategic Policing and Crime Reduction objectives and to consider whether those objectives have delivered the Police and Crime Plan in an efficient and effective manner.

The system of internal control is a significant part of that 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 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 policies, aims and objectives;
- Evaluate the likelihood of those risks being realised and the impact should they be realised; and
- Manage risks effectively, efficiently and economically.

The findings of the review of the system of internal control are reviewed by the Commissioner and the Chief Constable and independently reviewed by the Joint Audit Committee.

The Commissioner and the Chief Constable will formally approve any changes to the MoCG and framework on an annual basis as part of the governance review.

PRINCIPLES OF GOOD GOVERNANCE

The Policing Protocol Order 2011 requires the Commissioner and the Chief Constable to adopt and abide by the Nolan Principles for Conduct in Public Life. It also highlights the expectation that the relationship between all parties will be based upon the principles of goodwill, professionalism, openness and trust.

This is reflected in the Principles of Relationship document agreed by the Commissioner and the Chief Constable which forms part of their MoCG.

The MoCG is also consistent with the seven core principles of good governance set out in the International Framework for Good Governance in the Public Sector¹: -

1. *Behave with integrity, demonstrating strong commitment to ethical values and respecting the rule of law;*
2. *Ensure openness and comprehensive stakeholder engagement;*
3. *Define outcomes in terms of sustainable economic, social and environmental benefits;*
4. *Determine the interventions necessary to optimise the achievement of the intended outcomes;*
5. *Develop the entity's capacity, including the capability of its leadership and the individuals within it;*
6. *Manage risks and performance through robust internal control and strong public financial management; and*
7. *Implement good practices in transparency, reporting and audit to deliver effective accountability.*

The Code of Ethics issued by the College of Policing introduced two additional principles to the seven Nolan principles: Fairness and Respect (see the 'extended' Nolan Principles as set out below).

The Nolan Principles refer to Leadership in terms of promoting and supporting the principles of Conduct in Public Life but the Commissioner and the Chief Constable are explicitly committed to providing a robust, timely and caring response to events that affect the public and our communities. This is reflected in a clear statement in the Police and Crime Plan for 2017 - 2021 "Delivering a Safer Gwent", the priority given to preventing harm and protecting victims (particularly vulnerable people); to addressing the threats to community safety; and to working with local partner agencies in the public interest.

Selflessness: Decisions will be taken solely in terms of the public interest, and not for personal financial or other gain, whether for such person, their family or their friends.

Integrity: The Commissioner, the Chief Constable, their officers and staff will not place themselves under any financial or other obligation to outside individuals or organisations that may seek to influence them in the performance of their official duties.

Objectivity: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, the Commissioner, the Chief Constable, their officers and staff will make choices on merit.

Accountability: The Commissioner, the Chief Constable, their officers and staff will be accountable for their decisions and actions to the public and will submit themselves to whatever scrutiny is appropriate.

Openness: The Commissioner, the Chief Constable, their officers and staff will be as open as possible about all decisions and action they take. Reasons for decisions will be made available and information will be restricted only when so required by the wider public interest.

Honesty: The Commissioner, the Chief Constable, their officers and staff will have a duty to declare

¹ International Framework: Good Governance in the Public Sector (CIPFA/IFAC 2014)

any private interests relating to public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership: The Commissioner, the Chief Constable, their officers and staff will promote and support these principles through leadership and by example.

Fairness: The Commissioner, Chief Constable, their officers and staff will act with fairness and impartiality.

Respect: The Commissioner, Chief Constable, their officers and staff will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy.

The table at Appendix 1 illustrates how these Standards have been applied in the work of the Commissioner and the Chief Constable during the 2019/20 financial year, as well as identifying measures that will be undertaken in 2020/21.

GOVERNANCE ARRANGEMENTS

This governance framework aims to provide a strong focus on the drivers for policing within Gwent Police, and to ensure that there is a clear 'line of sight' between decisions taken and the Police and Crime Plan. The key elements of the framework are:

Manual of Corporate Governance

The Commissioner and the Chief Constable have in place a joint MoCG. The MoCG includes a Scheme of Delegation, Financial Regulations, the Principles of Relationships and Standing Orders relating to contracts. It also includes a decision making framework which ensures that, where possible, all the Commissioner's decisions are published and available for public scrutiny.

Principles of Relationships

This document recognises the Chief Constable's operational responsibilities, within the policy and accountability framework set by the Commissioner. The Principles enable the Commissioner to pursue his policy intentions that are reflected in operational plans for the Force and the accountability of the Chief Constable for their delivery. Notwithstanding their formal 'corporations sole' status, the relationship between the Commissioner and the Chief Constable is based on working together for the benefit of the people of Gwent under the joint banner of 'Gwent Police'.

The Principles also specify that the relationship between the Commissioner and Chief Constable will be built on trust, confidence and transparency. The governance arrangements adopted are consistent with the need to ensure accountability both between the parties and also accountability to the public. A transparent and auditable approach has been adopted which remained valid in 2019/20.

Governance Framework

As reported in the 2018/19 Annual Governance Statement, a review was undertaken in 2018 and this concluded that the principles of collaboration (as set out in the Principles and in the MoCG) would be best reflected through the establishment of a new meeting and

reporting structure for the Chief Constable, aligned to the delivery of the Police and Crime Plan, addressing both performance and delivery issues.

The Scrutiny Executive Board (chaired by the Deputy Chief Constable) feeds into the monthly Chief Officer Team meeting and ultimately into the quarterly Strategy and Performance Board.

In addition, issues from the Joint Strategic Planning Group continue to be reported to both the Chief Officer Team meeting and to the Commissioner's Strategy and Performance Board. These two Boards also collate recommendations from other internal meetings such as the Joint Audit Committee, Independent Ethics Committee and Estate Strategy Board.

This governance meeting structure was further reviewed during 2018/19 and 2019/20, to make some further changes to the same and the diagram below sets out the revised meeting structure within the Force and between the Office of the Police and Crime Commissioner for Gwent (OPCC).

The colour key to the diagram is as follows:

Green	Executive Boards;
Orange	Scrutiny Meeting;
Light Blue	Thematic Governance Boards;
Yellow	Departmental Meetings and sources of update that feed into Governance Boards; and
Grey	OPCC Meetings and independent Boards and bodies which impact the Governance Structure and contribute to the governance arrangements.



Governance Structure

External Reports:
 - All Wales collaboration
 - Internal / external audit
 - Ethics Committee
 - Independent Advisory Group
 - Joint audit committee

Strategy & Performance (PCC)

Chief Officer Team (CC)

Scrutiny Executive Board (DCC)

OPCC Meetings:
 - Strategic planning group
 - CC fortnightly meeting
 - Estates Strategy Board

Operational Performance (ACC)	Organisational Resources (ACO-R)	Victims (ACC)	People Strategy (DCC)	Service Improvement (DCC)
<ul style="list-style-type: none"> • East LPA & West LPA • Vulnerability • FPOC & Crime Data • Operational Tactics • JSIU • Hate Crime • Custody • Criminal Justice • Crime prevention • SOC • SPRG • JFU 	<ul style="list-style-type: none"> • Uniform User • Business Continuity • Fleet • Estates Implementation • Shared Facilities • Health & Safety • Greener Gwent • ICT • Finance & Capital Strategy 	<p><i>This Board will cease to exist in the future and will form part of the Operational Performance Board</i></p>	<ul style="list-style-type: none"> • Workforce Equality • Operational FRM • Learning & develop • Absence & Wellbeing • Welsh language <p>Closed session: <i>Intervention & diversion:</i> DCC H of PSD H of CCU H of HR</p>	<ul style="list-style-type: none"> • Project management • Corporate comms • DSD • Continuous Improvement
	<ul style="list-style-type: none"> • Procurement • Joint Legal Services • Information Assurance • ICT 			

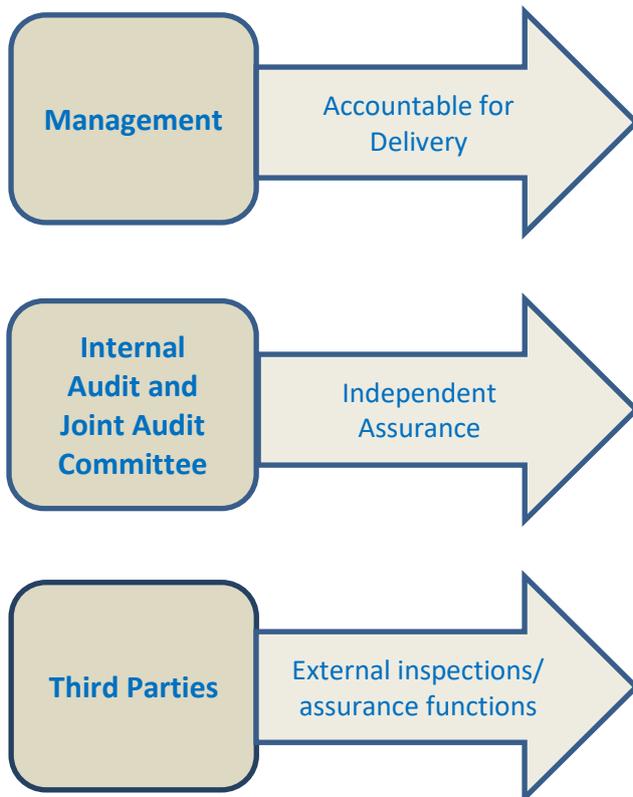
PART TWO

REVIEW OF EFFECTIVENESS

The Commissioner and Chief Constable have responsibility for conducting, at least annually, a review of the effectiveness of their governance framework including the system of internal control. The review of effectiveness is informed by:

- The work of Chief Officers and senior managers who have responsibility for the development and maintenance of the governance environment;
- The Internal Audit annual reports;
- The annual report of the Joint Audit Committee;
- The view of the external auditor through the annual audit letter; and
- Reports from other review inspectorates.

There are, accordingly, three principal lines of assurance methodology:



It is important to note that this Joint Annual Governance Statement and the work undertaken in its preparation is a tool in the self-evaluation by the Commissioner and the

Chief Constable of their governance arrangements.

The Annual Governance Statement is submitted for consideration to the Joint Strategic Planning Group and the Joint Audit Committee, before being approved at the Commissioner's Strategy and Performance Board. The Wales Audit Office (WAO) also reviews the Annual Governance Statement during its development and reports (by exception), if the Annual Governance Statement does not comply with requirements, as part of their Annual Audit Report.

The roles of the various bodies are detailed below:

Joint Audit Committee

In conjunction with the Chief Constable, the Commissioner established an independent Joint Audit Committee which provides assurance to enhance public trust and confidence in the governance of the Commissioner and the Chief Constable.

This approach is consistent with the Financial Management Code of Practice which states that such a combined body should consider the internal and external audit reports of both the Commissioner and the Chief Constable. The Joint Audit Committee also considers reports from Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) in relation to the annual Value for Money Profiles (but only the expenditure profiles therein) and other relevant reports of a non-operational nature. The Joint Audit Committee advises the Commissioner and the Chief Constable according to good governance principles and provides:

- Independent assurance to the Commissioner and the Chief Constable regarding the adequacy of the risk management framework and the associated control environment;
- Independent scrutiny of the Chief Constable's and the Commissioner's financial performance; and

- Oversight in relation to the financial reporting process adopted from the CIPFA Audit Committees Practical Guidance for Local Authorities.

The Joint Audit Committee provides comments, advice and assurance on matters relating to the internal control environment of the Force and the OPCC. It also has oversight of general governance matters. The Joint Audit Committee has specific responsibility to provide independent assurance on the arrangements for governance, including risk management and the internal control environment. During 2019/20, the Joint Audit Committee was composed of five individuals appointed by the Commissioner and the Chief Constable to act as independent advisers.

The Joint Audit Committee reports directly to the Commissioner and the Chief Constable. Four formal quarterly committee meetings are held each year in addition to an exceptional meeting to consider the Statement of Accounts and also an All-Wales Training Day for Joint Audit Committee members.

The Joint Audit Committee has formal terms of reference, covering its core functions, and these are also set out in the joint MoCG. These include reference to the Joint Audit Committee's role in respect of the corporate governance arrangements and in maintaining an overview of the regulatory framework. The Joint Audit Committee's terms of reference were reviewed and revised during 2019/20 in response to the publication of CIPFA's 'Audit Committees: Practical Guidance for Local Authorities and Police 2018 Edition'. The Commissioner and Chief Constable are both represented at all meetings of the Joint Audit Committee.

The Joint Audit Committee Annual Report for 2019/20 confirmed that the Joint Audit Committee remains satisfied that the Commissioner and the Chief Constable can be reasonably assured that the control, risk and

governance position for 2019/20 was appropriate.

Independent Ethics Committee:

This was jointly established by the Commissioner and the Chief Constable in April 2015. It is comprised of ten independent members as well as police officers and police staff. The Independent Ethics Committee provides advice, support and assistance concerning ethical challenges arising from operational, administrative or organisational matters facing Gwent Police.

Internal audit

Internal audit perform a range of reviews based on an agreed audit plan and in compliance with Public Sector Internal Audit Standards (PSIAS). The audit plan has regard to risks and recognises that key financial systems and other areas of wider business risk need to be reviewed on a cyclical basis to provide assurance with regard to internal controls and systems for governance. The plan is agreed by the Chief Finance Officers of both corporations sole, and is presented to the Joint Audit Committee for comment.

Regulation 5 of the Accounts and Audit (Wales) Regulations 2014 makes provision in respect of the internal control system that should be maintained in accordance with proper internal audit practices. The responsibility for the maintenance of an efficient internal audit function rests with both corporations sole (the Commissioner and Chief Constable). The role and standards of Internal Audit are defined in the PSIAS. The PSIAS encompasses the definition of Internal Auditing, a Code of Ethics and the International Standards for the Professional Practice of Internal Auditing. Internal Audit is required to provide an assurance opinion on the adequacy and effectiveness of systems of internal control. They also provide assurance in relation to the management of financial and operational business risks, corporate governance and the entire control framework.

The review of both the corporate governance and risk management arrangements (which

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are captured in the joint Risk Register maintained by the Chief Constable and the Commissioner) periodically feature in the annual audit plan. Corporate governance and risk management issues may also arise through other reviews carried out by Internal Audit. In these cases the issues will be dealt with initially in the relevant audit report.

Internal Audit then present their reports on the adequacy of controls in the systems audited to the Joint Audit Committee, setting out any areas of concern.

Internal Audit Work During 2019/20

The internal audit work for the last year was risk based and focused on significant financial and operational risks. The incumbent internal audit service for the Commissioner and Chief Constable are TIAA, following their reappointment from 1st April 2019.

However, by virtue of the Commissioner and Chief Constable being members of the Shared Resource Services (SRS), for the delivery of Information Communication Technology (ICT) services in collaboration with Torfaen County Borough Council (TCBC), Monmouthshire County Council (MCC), Blaenau Gwent County Borough Council (BGCBC) and Newport City Council (NCC), from May 2016, the TCBC internal audit service was selected to undertake the audit plan for the SRS. This was to ensure that a consistent audit approach was adopted across all constituent SRS partners and therefore TIAA were formally advised that they would no longer be expected to provide assurance to the Joint Audit Committee for the ICT services operated by Gwent Police. Progress on the delivery of the internal audit plan for ICT services is reported to the Joint Audit Committee alongside the audit plan delivered by TIAA. Such assurance will be provided by TCBC internal audit function, to which the WAO will refer in considering the control framework for the ICT functions.

During 2019/20 TIAA undertook 20 audits (including 5 undertaken collaboratively across all Welsh Forces) of which 7 were assessed as providing substantial assurance (2 in 2018/19),

10 with reasonable assurance (15 in 2018/19), 2 with limited assurance (5 in 2018/19) and 1 was advisory with no assessment given.

New HQ - Contract Management (Visit 1 Q2)	Substantial
New HQ - Contract Management (Visit 2 - Q4)	Substantial
Treasury Management	Substantial
Budgetary Control	Substantial
Payroll (Collaborative)	Substantial
Fixed Assets	Substantial
Fleet Management – Repairs and Maintenance	Substantial
Creditors (Collaborative)	Reasonable
Debtors (Collaborative)	Reasonable
General Ledger	Reasonable
Counter Fraud - Whistleblowing	Reasonable
Duty Resource Management	Reasonable
Risk Management - Mitigating Controls	Reasonable
HR Management – Absence Management	Reasonable
Internet/Email/Social Media	Reasonable
Estate Management - Delivery (Collaborative)	Reasonable
Single Online Home (Collaborative)	Reasonable
Victims' Hub	Limited
Local Policing - Property and Cash	Limited
Collaborative Change Control	Advisory
Performance Management	Deferred
Corporate Communications	Deferred

These reports generated 64 recommendations, of which only 5 were urgent, 29 were considered important and 30 were categorised as routine.

Of the 2 Limited Assurance internal audits the actions either have been addressed or actions taken to mitigate the risk.

As part of the audit programme, the internal auditors also carried out 3 follow up audits to check progress against all Priority 1 and 2 Recommendations. These reports were discussed at the Joint Audit Committee.

Two audits have been deferred to 2020/21 at management’s request, due to the completion of departmental restructures or the creation of management frameworks within the areas for audit occurring later in the financial year than originally planned.

Enterprise Architecture Management	Limited
IT Disposals	Limited
Memorandum of Understanding	Advisory
Cyber Security	Deferred
Back Office	Deferred

TIAA’s Annual Opinion was that they were satisfied that sufficient internal audit work has been undertaken to allow them to draw a positive conclusion as to the adequacy and effectiveness of the Police and Crime Commissioner’s and the Chief Constable’s risk management, control and governance processes. In their opinion, the Police and Crime Commissioner and the Chief Constable have adequate and effective management, control and governance processes in place to manage the achievement of their objectives for the areas reviewed during the year.

These reports generated 48 recommendations, of which one was high, 34 were medium and 13 were categorised as low and confirms significant improvement on the preceding year’s audit performance

Of the 2 Limited Assurance internal audits the actions either have been addressed or actions taken to mitigate the risk.

During 2019/20 TCBC undertook 11 audits, which includes 2 deferred from 2018/19 (the third report deferred from 2018/19 has been further deferred until 2020/21). In addition, one audit originally planned to be undertaken in 2019/20 (Back Office) was also deferred into quarter one of 2020/21, as a result in delays in preceding audits. The scope of one of the 11 audits undertaken (CCTV) did not involve Gwent Police, therefore the assessments of the 10 Gwent Police audits undertaken confirm that 5 were assessed as providing substantial assurance (2 in 2018/19), 5 with moderate assurance (3 in 2018/19), 2 with limited assurance (3 in 2018/19) and 1 was advisory with no assessment given.

TCBC’s Annual Opinion was that they were satisfied that sufficient internal audit work has been undertaken to allow an overall opinion to be given as to the adequacy and effectiveness of governance, risk management and control of the SRS’s framework of governance. TCBC’s Annual Opinion was generally satisfactory, with some improvement required in relation to the adequacy and effectiveness of governance, risk management and control.

This opinion is defined as:

- Medium risk rated weaknesses identified in individual assignments that are not significant in aggregate to the system of internal control; and/or
- High risk rated weaknesses identified in individual assignments that are isolated to specific systems or processes; and
- None of the individual assignment reports have an overall classification of critical risk.

Firewall	Substantial
Mobile Computing	Substantial
Identity and Access Management	Substantial
Performance Management – SRS	Substantial
Virtualisation	Substantial
Supplier Management	Moderate
Software Licensing/Management	Moderate

External Audit

The Public Audit (Wales) Act appoints the Auditor General for Wales to audit the financial statements of the Commissioner and the Chief Constable. The Act also requires the Auditor General for Wales to assess whether the Commissioner and the Chief Constable have made proper arrangements for securing

economy, efficiency and effectiveness in the use of resources.

The WAO, on behalf of the Auditor General for Wales, audit the financial statements of the Commissioner and Chief Constable, as well as the Group accounts and also report (by exception) on the Joint Annual Governance Statement if it does not comply with requirements.

The WAO in their annual audit report also comment on the financial aspects of corporate governance. This includes the legality of financial transactions, financial standing, systems of internal financial control and the standards of financial conduct, fraud and corruption.

Such external audit plans and reports, including the annual audit letter, are considered by the Joint Audit Committee at appropriate times in its annual cycle of meetings.

Both the Commissioner and the Chief Constable have a duty to respond to reports by the external auditor.

Other Bodies

The Welsh Government, Home Office and a number of other bodies require financial returns to monitor expenditure on revenue and capital. Strict terms and conditions are in place to govern additional external funding received from these bodies.

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS/the Inspectorate)

The role of the HMICFRS (which also has Fire Service responsibilities for England only) is to promote the economy, efficiency and effectiveness of policing in England, Wales and Northern Ireland, through inspection of police organisations and functions to ensure agreed standards are achieved and maintained; good practice is spread; and performance is improved. HMICFRS inspects the functions of the Chief Constable, not the Commissioner. It also provides advice and support to the

tripartite partners (Home Secretary, Commissioners and Chief Constables).

HMICFRS is independent of the Commissioner, the Chief Constable and the United Kingdom and Welsh Governments. Its remit is to assess the work of police forces in different areas of business, including neighbourhood policing, serious and organised crime, anti-social behaviour and tackling major threats such as terrorism. HMICFRS also actively monitors the performance of the Force in relation to their plans for ensuring the sustainability of an efficient and effective police service in light of the significant grant reductions from recent Comprehensive Spending Reviews. To date, reports in this area of inspection have been positive and encouraging. Reports are published on the following website:

<https://www.justiceinspectorates.gov.uk/hmicfrs/>

HMICFRS reports are sent to the Chief Constable and the Commissioner for consideration and appropriate action. HMICFRS plays a key role in informing the Commissioner and the public on the efficiency and effectiveness of their forces and, in so doing, facilitate the accountability of the Commissioner to the public.

The Commissioner has a duty in law to respond to any HMICFRS report within 56 days of its publication with any response forwarded to the Home Secretary and the HMICFRS. Responses should include an update on any actions the Force is/is not taking in relation to any recommendations made within the report.

Inspection Work During 2019/20

HMICFRS's reports during 2019/20 supported the monitoring and development of many Force priorities. They also produced a suite of value for money indicators to challenge areas of exceptional spend, demand and performance in comparison with Gwent Police's most similar forces. The results of the benchmarks inform the Force's change programme.

PEEL Assessment by HMICFRS

During 2019/20, HMICFRS published its assessments of police forces which would allow members of the public to see how well its local force is performing. These are known as PEEL assessments (and examine Police Effectiveness, Efficiency and Legitimacy):

- **Effectiveness:** how well the force carries out its responsibilities, including cutting crime, protecting vulnerable people, tackling anti-social behaviour and dealing with emergencies and other calls for service;
- **Efficiency:** how well the force provides value for money; and
- **Legitimacy:** how well the force provides a service that is fair and treats people properly and within the law.

The PEEL assessments given to Gwent Police from the 2019/20 programme of work are as follows:

- The extent to which the Force is **effective** at keeping people safe and reducing crime – Overall **Good**:
 - Preventing Crime and Tackling ASB – **Good**;
 - Investigating Crime – **Good**;
 - Protecting Vulnerable People – **Good**; and
 - Tackling SOC – **Good**.
- The extent to which the Force is **efficient** at keeping people safe and reducing crime – Overall **Good**:
 - Meeting Current Demands and Using Resources – **Good**; and
 - Planning for the Future – **Good**.
- The extent to which the force is **legitimate** at keeping people safe and reducing crime – Overall **Requires Improvement**:
 - Fair Treatment of the Public (Stop and Search) – **Requires Improvement**;
 - Ethical and Lawful Workforce – **Requires Improvement**; and
 - Fair Treatment of Workforce – **Good**.

In relation to the areas that ‘Require Improvement’, the Force recognises:

- The importance of working closely with communities, with Police Officers and Police Staff understanding how important it is to treat people with fairness and respect. However, it was acknowledged that frontline Police Officers and Police Staff varied in their knowledge of unconscious bias;
- That the workforce understand how and when to use ‘Stop and Search’, however, the monitoring of the use of ‘Stop and Search’ needs to improve;
- That more needs to be done to ensure that all members of the workforce are appropriately vetted for the posts they hold. In addition, the monitoring of people who apply for roles needs to be undertaken, to see if they belong to certain protected minority groups; and
- The need to improve how it spots and manages risk of corruption and to ensure it has enough people and resources to do this work.

HMICFRS also undertook a number of national/thematic reviews in 2019/20. Gwent were subject to a National Child Protection Inspection review visit in January 2020 and were also part of a pilot Joint Inspection of Child Protection Arrangements in Newport in December 2019. Current inspection timetable has been suspended by HMICFRS due to COVID-19.

Police and Crime Panel

The Police and Crime Panel (the Panel) is responsible for supporting the effective exercise of the functions of the Commissioner through reviewing or scrutinising decisions made, or other action taken, by the Commissioner in connection with the discharge of his functions

The Panel is not there to scrutinise the performance of the Chief Constable and her

Force directly – that is the role of the Commissioner.

The Panel is made up of twelve local Councillors, representing the local councils in Gwent, along with two independent members.

The responsibilities and powers of the panel include:

- Making reports and recommendations about actions and/or decisions of the Commissioner;
- Scrutinising the draft Police and Crime Plan;
- Summoning the Commissioner, and his staff, for public questioning;
- Scrutinising and potentially, by two-thirds majority, vetoing the police budget and council tax precept;
- Scrutinising and potentially, by two-thirds majority, vetoing the appointment of the Chief Constable;
- Holding confirmation hearings for the Commissioner’s senior staff (including the Deputy Police and Crime Commissioner, the Chief Executive and the Chief Finance Officer); and
- Dealing with lower level complaints against the Commissioner.

The Panel’s agendas and minutes are published on the following website:

<http://www.gwentpcp.org.uk/>

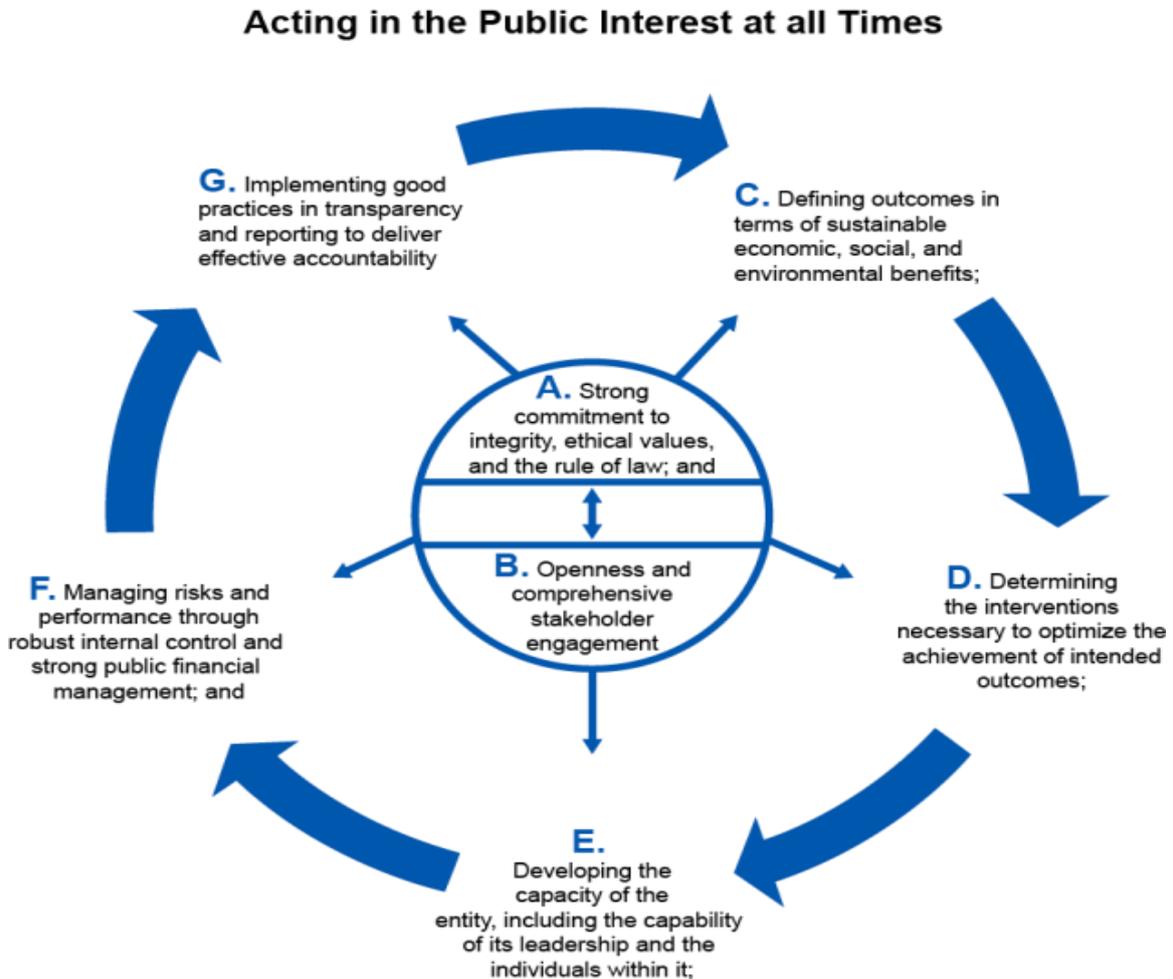
During 2019/20 the work of the Panel included consideration of the following:

- The Police and Crime Plan;
- Scrutiny of OPCC evidence for monitoring Force Performance;
- Undertaking the confirmation hearing for the new Chief Constable
- Medium Term Financial Projections;
- Precept proposal 2020/21;
- Progress on the Estate Strategy;
- Implementation of Welsh Language Standards across Gwent Police – Annual Report;
- Treasury Management Strategy;
- Absence Management in Gwent Police; and
- A ‘Deep Dive’ into - ‘A Day in the Life of Gwent Police’

There were 5 meetings of the Police and Crime Panel in 2019/20, including the ‘Deep Dive’.

ANNUAL ASSESSMENT AND ACTION PLANS

The diagram below shows the relationship between the seven core principles of good governance. The central two principles underpin the whole framework and relate to ‘acting in the public interest’. These two principles are implicit in the remaining five which concern ‘achieving good governance’.



The assessment of effectiveness considered the range of evidence available: Internal and externally published material; professional independent opinion; and the views of senior management, the Police and Crime Panel and professional leads. A summary of the evidence in support of the assessment can be found at Appendix 1.

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A summary of the 2019/20 assessment is shown below:

Good Governance Category		Assurance
Acting in the Public Interest	Behaving with Integrity & Ethics	Reasonable
	Openness & Engagement	Reasonable
Achieving Good Governance	Sustainable Outcomes	Reasonable
	Determine Interventions	Reasonable
	Capacity & Leadership	Reasonable
	Risks & Performance	Reasonable
	Transparency & Accountability	Reasonable

Assurance Definitions	
Substantial	All areas reviewed were found to have effective corporate processes and external requirements in place. Behaviours and outcomes were well evidenced and the risks against the achievement of objectives are well managed.
Reasonable	Most areas reviewed were found to have effective corporate processes and external requirements in place. Most behaviours and outcomes were well evidenced and in general, the risks against the achievement of objectives are well managed.
Partial	A number of areas reviewed were found not to have effective corporate processes and external requirements in place. Some behaviours and outcomes were well evidenced, but key risks against the achievement of objectives were not well managed.
None	A significant number of areas reviewed were found not to have effective corporate processes and external requirements in place. Behaviours and outcomes were not well evidenced and risks against the achievement of objectives were not well managed.

2019/20 Action Plan

No significant governance issues were identified for 2019/20; however, the following action plan addresses the issues identified:

Category	Risk Area/Weakness	Action to be Delivered in 2020/21 and Beyond
Behaving with Integrity and Ethics; and Capacity and Leadership.	Need to establish the effectiveness of ethical awareness training and the degree it underpins organisational culture. (OPCC and Force)	The Ethics Committee will be tasked with establishing the most appropriate mechanism to determine effectiveness. Its recommended approach will be delivered as an action plan throughout 2020/21.
Behaving with Integrity and Ethics; Sustainable Outcomes; and Capacity and Leadership.	Need to ensure that whistleblowing policies are in place and working effectively. (OPCC and Force)	The findings of the 2019/20 Internal Audit will be implemented.
Behaving with Integrity and Ethics; Openness and Engagement; and Determine Interventions.	Protocols for Partnership working to be established; to include how values are	Partnership working protocols to be developed.

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	embedded and evidenced. (OPCC and Force)	
Behaving with Integrity and Ethics.	Need to evidence that there is two-way interaction between the Commissioner's Police and Crime Plan and the community plans of Local Authorities. (OPCC and Force)	Ongoing attendance of OPCC staff at the Gwent Public Services Boards will assist in embedding the benefits of a two-way interaction between devolved and reserved Functions in Wales.
Sustainable Outcomes, Managing Risks and Transparency and Accountability.	Need to evidence that Gwent Police is acting upon HMICFRS assessments and recommendations. (OPCC and Force)	This will be delivered through the revised meeting structure within the Force and between the OPCC.
Determine Interventions; and Risks and Performance.	Performance Management Framework and Measures for the Police and Crime Plan yet to be finalised. (OPCC and Force)	Performance Management Framework and Measures to be finalised for the Police and Crime Plan and evidence of corrective action (where necessary) provided.
Determine Interventions.	Business Plans do not demonstrate consideration of 'Social Value'. (OPCC and Force)	Consideration should be given to embedding the concept of 'social value' across the OPCC and Force through a social value policy.
Risks and Performance	Due to an unexpected internet interruption in August 2019, the Assistant Accountant (Treasury) was unable to transfer funds to a Money Market Fund that day. This resulted in the Commissioner retaining funds in the bank account (£5.5m), in excess of the level determined in the Treasury Management Strategy (£2m). This minor breach of the Commissioner's Treasury Management Strategy was rectified the following day. (OPCC and Force)	Contingency plans for events outside the control of the Finance Department, to avoid breaches in Financial Strategies, Regulations and Procedures should be reviewed.
Risks and Performance	During 2019/20, the OPCC experienced one data breach, through the loss of a mobile phone. Due to the security features in place and the ability to delete the contents of the phone remotely, this breach was not significant	Officers and staff will continue to be reminded of the importance of security of data and the wider requirements and implications of the General Data Protection Regulations (GDPR). There are

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	<p>enough to report to the Information Commissioner's Office.</p> <p>Furthermore, the Force experienced 65 data breaches during 2019/20. Details of breaches, impact, mitigation and outcome are recorded and kept by the Record Review Officer in line with MOPI and GDPR.</p>	<p>mandatory NCALT packages, the completion of which can be monitored.</p> <p>Details of breaches, impact, mitigation and outcome are recorded and kept by the Record Review Officer (OPCC) and Data Protection Officer (Force) in line with MOPI and GDPR.</p>
Risks and Performance	The effectiveness of business continuity planning needs to be assessed. (OPCC and Force)	Existing Internal Audit recommendations to be finalised.
Transparency and Accountability	The effectiveness of the governance arrangements for collaboration agreements needs to be determined. (OPCC and Force)	The WAO are undertaking a review of the governance arrangements across Welsh Forces within collaborative areas of work. Their findings will be reported during 2020/21.

Progress against 2018/19 Action Plan

Category	Risk Area/Weakness	Action to be Delivered in 2019/20 and Beyond
Behaving with Integrity and Ethics; and Capacity and Leadership.	Behaving with Integrity and Ethics not formally built into induction programmes for staff. (OPCC)	<p>Formal induction programme for OPCC to be established, including the standards of behaviour expected.</p> <p>2019/20 Update: Complete - OPCC Staff attend the Gwent Police formal induction programme, which is overlaid with a specific OPCC induction process, containing a general element for the OPCC and a specific role element.</p>
Behaving with Integrity and Ethics; Sustainable Outcomes; and Capacity and Leadership.	Staff Performance Framework to be established. (OPCC)	<p>OPCC Business Plan to be finalised and associated Staff Performance Framework to be created.</p> <p>2019/20 Update: Complete – 2020/21 OPCC Business plan created and communicated, with</p>

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		associated Performance Framework established.
Behaving with Integrity and Ethics; Openness and Engagement; and Determine Interventions.	Clarity required over 'decision making' framework and procedures, including how evidence is collected that shared values guide decision making. (OPCC and Force)	Decision Making framework and procedures to be considered. 2019/20 Update: Partly Complete - OPCC away days have considered the purpose and values of the OPCC and also the Nolan principles. This has been supplemented by clarification of role profiles and portfolios for the executive team. The revised meeting structure within the Force and between the OPCC will need time to 'bed in' to determine its effectiveness.
Behaving with Integrity and Ethics; Openness and Engagement; and Determine Interventions.	Protocols for Partnership working to be established; to include how values are embedded and evidenced. (OPCC and Force)	Partnership working protocols to be developed. 2019/20 Update: Ongoing – Formal protocols yet to be established. Carry forward to 2020/21 Action Plan.
Behaving with Integrity and Ethics.	Job Description and Portfolios to be established for Commissioner, Deputy Commissioner and Chief Officers. (OPCC)	Job Description to be finalised for Deputy Commissioner and Portfolios confirmed across the entire Executive Team. 2019/20 Update: Complete – Job description and portfolios finalised.
Openness and Engagement; Risks and Performance; and Transparency and Accountability.	Chief Officer Level Management Group Minutes are not published (OPCC and Force).	Review the degree of publication of Chief Officer Level Management Group minutes across policing. 2019/20 Update: Complete – There is no requirement to publish Chief Officer Level Management Group minutes across policing, as the formal decisions arising from these

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		meetings are separately published either as Decision Logs or via the minutes of the subsequent formal meetings which have decision making powers.
Determine Interventions; and Risks and Performance.	Performance Management Framework and Measures for the Police and Crime Plan yet to be finalised. (OPCC and Force)	Performance Management Framework and Measures to be finalised for the Police and Crime Plan and evidence of corrective action (where necessary) provided. 2019/20 Update: Ongoing – Significant progress and reporting to governance boards. Format due to be finalised. Carry forward to 2020/21 Action Plan.
Determine Interventions.	Business Plans do not demonstrate consideration of 'Social Value'. (OPCC and Force)	Consideration should be given to embedding the concept of 'Social Value' across the OPCC and Force. 2019/20 Update: Ongoing – Both the Commissioning Framework and Procurement Strategy consider the wider social elements and provide the main general commitment to social value. In addition Gwent Police has signed up to the Welsh Government Code of Practice on ethical supply chains. Further embedding of this concept could be through the development of a Social Value Policy. Carry forward to 2020/21 Action Plan.
Risks and Performance.	In November 2018, a threshold within the 2018/19 Treasury Management Strategy was breached, by virtue of the monetary limit to be placed with one counterparty being exceeded. The investment overlap was discovered on	Staff undertaking the Treasury Management Function have been reminded of the need to strictly adhere to the relevant Treasury Management Strategy. 2019/20 Update:

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	the same day the investment was made and the Commissioner's Chief Finance Officer was contacted immediately for a decision on how to rectify. One option was to unwind the one investment early losing £2,000 of interest so there was no breach, or breaching the limit for six weeks until the planned repayment date. Due to the low risk of the counter party (a Local Authority) it was decided to breach the limit for 6 weeks. The Commissioner had no liquidity difficulties during this period.	Complete – However note further unconnected breach in 2019/20 assessment above.
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CONCLUSION AND OPINION

The Commissioner and Chief Constable are responsible for ensuring that their business is conducted in accordance with the law and proper standards, and that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. In discharging this overall responsibility, they are responsible for putting in place proper arrangements for the governance of their affairs, facilitating the effective exercise of their functions, which includes arrangements for the management of risk.

The impact of the Coronavirus pandemic, at the time of signing this Annual Governance Statement, has not adversely impacted upon the governance arrangements in place. Indeed, recent investment in digital and mobile technology, coupled with 'cultural' investment in agile working practices, has enabled both corporations sole to maintain 'business as usual'.

This Annual Governance Statement is designed to manage rather than eliminate the risk of failure to achieve these objectives; it can therefore only provide reasonable and not absolute assurance of effectiveness.

However, based upon the above review of the sources and effectiveness of assurance set out in this Annual Governance Statement, the Commissioner and Chief Constable are satisfied that they have in place '**Reasonable**' governance arrangements, including appropriate systems of internal control and risk management, which facilitate the effective exercise of their functions.

The Commissioner and Chief Constable propose over the coming year to take steps to address the Governance actions as outlined in the action plan, to ensure governance arrangements within the OPCC and the Force continue to be enhanced and improved as identified in their review of effectiveness. The monitoring of their implementation and operation will form part of the next annual review.

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Police and Crime Commissioner for Gwent

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Chief Finance Officer (Commissioner)

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Chief Executive (Commissioner)

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Chief Constable of Gwent

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Chief Finance Officer (CC)

APPENDIX 1

The following tables details how the Commissioner and Chief Constable have complied with the governance framework to meet of each of the Nolan principles (as extended) and the seven international good governance principles. Each section of the statement includes a commentary on work undertaken during the last year, areas identified for development and improvement as part of the review process which forms an action plan for the forthcoming year.

Nolan Principles

<u>Principle:</u>	<u>What we do:</u>	<u>Specific action taken in 2019/20 and plan(s) for 2020/21:</u>
<p>Selflessness:</p> <p>Decisions will be taken solely in terms of the public interest, and not for personal financial or other gain, whether for such person, their family or their friends.</p>	<p>Commissioner:</p> <ul style="list-style-type: none"> • Compliance with the Elected Local Policing Bodies (Specified Information) Order 2011 and the Elected Local Policing Bodies (Specified Information) (Amendment) Order 2012 which requires the publication of information in relation to various matters including, the names of the Commissioner and Deputy Commissioner, correspondence address for each, salaries, expenses, register of interests and the number of complaints about them which are brought by the Panel; • Specific reference to interests on the decision form; • The Commissioner’s, Deputy Commissioner’s and senior officers’ salaries and expenses are disclosed in Statement of Accounts; and • Details of key decisions taken by the Commissioner are published on the website. <p>Chief Constable:</p> <ul style="list-style-type: none"> • The Force’s external website contains details of declared business interests and of gifts and hospitality accepted and declined by Chief Officers; and • Senior officers’ salaries and expenses are disclosed in the Statement of Accounts. 	<ul style="list-style-type: none"> • Monitoring any changes to the 2011 and 2012 Orders and continuously seeking to ensure all relevant information is captured and disclosed as required; • Updated details in relation to the ‘Related Parties Disclosure’ in the Force accounts to accord with the current guidance and the list of affected staff was extended to ensure transparency; and • Ensure that decision logs are maintained and updated regularly and that these are accessible on external websites.
<p>Integrity:</p> <p>The Commissioner, the Chief Constable,</p>	<p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none"> • Compliance with the MoCG and Principles of Relationships agreed between the Chief Constable and the Commissioner; 	<ul style="list-style-type: none"> • Review and reinforce the procedures set out in the MoCG to ensure understanding and compliance;

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<p>their officers and staff will not place themselves under any financial or other obligation to outside individuals or organisations that may seek to influence them in the performance of their official duties.</p> <p><i>IFGG Standard 1: Behave with integrity, demonstrating strong commitment to ethical values and respecting the rule of law</i></p>	<ul style="list-style-type: none"> • Ensuring that the register of gifts and hospitality is updated as and when offers are received; • Ensuring related parties' disclosure in the Statement of Accounts; • The Chief Officer Team creates a climate of ethical behaviour and encourages others to challenge unprofessional behaviour, leading by example. Officers and staff are aware of the boundaries of professional behaviour, and more serious unprofessional behaviour is investigated by the Professional Standards Department; • The Force has utilised a variety of media to raise awareness of integrity issues for staff, including extending the membership of the Ethics Committee to include representation from both officers and staff (in addition to independent members) thus providing further emphasis on the importance of ethical behaviour and integrity. Arrangements are in place to ensure that staff understand and adhere to the Code of Ethics; • All requests for authorisation of a business interest are recorded in a central electronic register; • There are confidential mechanisms and a clear policy to support staff reporting wrongdoing; and • 2019/20 continued to see public Police Misconduct Hearings chaired by independent Legally Qualified Chairs. 	<ul style="list-style-type: none"> • Durham University was contracted to undertake a corporate health/staff survey to support the wider wellbeing agenda in 2018 and this will be repeated to monitor progress made. The results were very positive in terms of staff integrity and public service ethos; • In 2018/19 Chief Officers introduced a new register in which they disclosed any media contacts in accordance with the recommendation (no 76) made by Leveson, and this will be maintained and monitored in 2019/20; and • The Ethics Committee will report to the Chief Constable and the Commissioner on any recommendations they have made in 2019/20.
<p>Objectivity:</p> <p>In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, the Commissioner,</p>	<p>Commissioner:</p> <ul style="list-style-type: none"> • All posts are made on merit in compliance with section 7 of the Local Government and Housing Act 1989; • All posts within the Commissioner's staff are politically restricted, with the exception of the Commissioner and Deputy Commissioner; • The Chief Executive/Monitoring Officer and Chief Finance Officer have specific legal responsibilities to advise on the lawfulness and budget implications of transactions; and • Where relevant, details of posts are included within the annual Statement of Accounts. 	<ul style="list-style-type: none"> • Any further appointments will be made in compliance with the requirements of the Act and Regulations; and • Adoption of new Southern Wales procurement strategy - which will continue to be monitored during 2020/21.

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<p>the Chief Constable, their officers and staff will make choices on merit.</p>	<p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none"> • The MoCG (including the Financial Regulations and the Standing Orders Relating to Contracts) expressly provide for the processes to be applied in relation to contracts. Such processes are transparent and auditable with full use being made of the etenderwales and Sell2Wales systems; • Contract documentation is published on the Blue Light Police Database, which is a national system accessible by the public; • Contracts are also published in accordance with the requirements of the 2011 Order (as amended); and • All force appointments (both into operational and support roles) are made in accordance with force recruitment policies and in accordance with the requirements of current legislation. 	
<p>Accountability:</p> <p>The Commissioner, the Chief Constable, their officers and staff will be accountable for their decisions and actions to the public and will submit themselves to whatever scrutiny is appropriate.</p> <p><i>IFGG Standard 6: Manage risks and performance through robust internal control and strong public</i></p>	<p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none"> • Informed and Transparent Decisions: All decision making operates within the specific legislative and regulatory frameworks that confer on both the Commissioner and the Chief Constable duties, powers and responsibility; • As set out above, the Commissioner holds the Chief Constable to account for the maintenance of an efficient and effective force. The Commissioner and the Chief Constable ensure that information relating to decisions is made readily available to local people; • Scrutiny: The independent Joint Audit Committee appointed jointly by the Commissioner and the Chief Constable has held 5 formal meetings during the course of the year. The Joint Audit Committee has attended a national training event with CIPFA. As an advisory body, the Joint Audit Committee has undertaken a significant amount of work to review and make recommendations in respect of the arrangements adopted by the Commissioner and the Chief Constable for governance and management of risk; • Risk remains a standing agenda item on all strategic meetings within the Force and all decision making meetings of the Commissioner. The joint risk management adopted by the Commissioner and the Chief Constable 	<ul style="list-style-type: none"> • The Joint Audit Committee has held 5 formal meetings during the course of the year. As an advisory body, the Committee has undertaken a significant amount of work to review and make recommendations in respect of the arrangements adopted by the Commissioner and the Chief Constable for governance and management of risk; • During 2019/20 the matters identified through the Joint Risk Register have been managed through the governance infrastructure set out in the MoCG. Boards within the structure continue to own and manage the issues relevant to their remit and the risks are updated in the Joint Risk Register and escalated as appropriate;

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<p><i>financial management.</i></p> <p><i>IFGG Standard 4: Determine the interventions necessary to optimise the achievement of the intended outcomes.</i></p>	<p>establishes how risk is embedded throughout the various elements of corporate governance of the corporation(s) sole;</p> <ul style="list-style-type: none">• The Chief Finance Officers for the Commissioner and for the Chief Constable advise their respective corporation sole on the safeguarding of assets, risk management and insurance. They ensure that in relation to any strategic business decisions of the Commissioner and the Chief Constable, that consideration is given to immediate and longer term implications, opportunities and risks. They will follow the new CIPFA Guidance for the role of the Chief Finance Officer and the new Financial Management Code of Practice issued in July 2018;• Part of the approach to risk management involves the purchasing of insurance cover to protect assets and liabilities where it is either required or cost effective to do so. The organisation is proactive in self-insuring some elements of the overall insurance package. The Commissioner and Chief Constable maintain an insurance provision which is reviewed annually to help meet claims;• Decision records are published on public website in compliance with the 2011 and 2012 Orders and with the requirements of section 11 of the Police Reform and Social Responsibility Act 2011;• The Commissioner provides the Panel with any information which it may reasonably require (in compliance with section 13 of the Police Reform and Social Responsibility Act 2011) and also seeks to keep them informed of significant developments. The Commissioner produces an annual report in accordance with section 12 of the Police Reform and Social Responsibility Act 2011. The Panel do not scrutinise the performance of the Chief Constable or those responsible to her as this is the responsibility of the Commissioner, but both the Commissioner and the Chief Constable seek to ensure that Panel Members are well informed on operational issues. The meetings of the Panel are held in public and it met 5 times during 2019/20 – however, as one of these meetings was a ‘Deep Dive’, only 4 were held in public;• Statements of Account are produced annually and subject to public inspection and audit by WAO. WAO report by exception on the Joint Annual	<ul style="list-style-type: none">• 2020/21 will see further engagement with the Panel to create a development and briefing programme of work to support them in undertaking their functions; and• Repeat of annual update training to the members of the Joint Audit Committee, with external providers such as CIPFA and the WAO.
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	<p>Governance Statement. WAO assess the arrangements for securing economy, efficiency and effectiveness in the use of resources;</p> <ul style="list-style-type: none"> • The Commissioner and Chief Constable jointly commission an Internal Audit service and have agreed the audit plan; and • The HMICFRS conducts its own comprehensive inspection of Force performance and the Commissioner comments on the findings. HMICFRS reports are published on their website and are publicly accessible. 	
<p>Openness:</p> <p>The Commissioner, the Chief Constable, their officers and staff will be as open as possible about all decisions and action they take. Reasons for decisions will be made available and information will be restricted only when so required by the wider public interest.</p> <p><i>IFGG Standard 2: Ensure openness and comprehensive stakeholder engagement</i></p> <p><i>IFGG Standard 3: Define outcomes in</i></p>	<p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none"> • The Commissioner and Chief Constable have adopted arrangements for effective engagement with key stakeholders, ensuring that where appropriate such stakeholders remain closely involved in decision making, accountability and the future direction of the service; and • In compliance with the Elected Local Policing Bodies (Specified Information) Orders 2011 and 2012 (and the guidance provided by the Information Commissioner) a range of information has been made publically available through the force and Commissioner’s websites over the course of the last year. The Commissioner’s decisions, which are of significant public interest, are publicised on his website (unless there are specific reasons why a decision should be exempt). 	<ul style="list-style-type: none"> • Public consultation and/or engagement will continue to be undertaken by way of a comprehensive strategy which includes: <ul style="list-style-type: none"> ○ Regular meetings with the local authorities in Gwent; ○ Frequent meetings with other key partners, including the Welsh Government; ○ Public consultation on the Police and Crime Plan and Precept; ○ Widespread use of social media and the Commissioner’s website. ○ Press, TV and radio articles and interviews; ○ Responding to complaints; and ○ Surveys. • Alignment with Local Government wellbeing plans and continuing adoption of the principles of the Wellbeing of Future Generations (Wales) Act 2015; and

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<p><i>terms of sustainable economic social and environmental benefits.</i></p>		<ul style="list-style-type: none"> • Gwent Police remain committed to sustainable environmental initiatives and this will be reflected in its proposals for the development of a new Gwent Police Headquarters and its wider Estate Strategy.
<p>Honesty:</p> <p><i>The Commissioner, the Chief Constable, their officers and staff will have a duty to declare any private interests relating to public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.</i></p> <p><i>IFGG Standard 7: Implement good practices in transparency, reporting and audit to deliver effective accountability</i></p>	<p>Commissioner:</p> <ul style="list-style-type: none"> • A Register is maintained of the Commissioner’s disclosable interests in accordance with Schedule 1, Paragraph 1(e) of the Elected Local Policing Bodies (Specified Information) Order 2011 (as amended). <p>Chief Constable:</p> <ul style="list-style-type: none"> • Any business interests are disclosed and maintained in a Register (which is accessible to the public). 	<ul style="list-style-type: none"> • The Professional Standards Department (Chief Constable) and the Chief Executive (Commissioner) will continue to monitor compliance by Police Officers and Police Staff with these requirements.
<p>Leadership:</p> <p><i>The Commissioner, the Chief Constable, their officers and staff will promote</i></p>	<p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none"> • Adoption of Nolan Principles in the MoCG; • Adoption and embedding of the Code of Ethics (including the establishment of a joint Independent Ethics Committee); • Clear Leadership Team; 	<ul style="list-style-type: none"> • Implementation of a new PDR system for the development of staff which supports the HMICFRS recommendations in terms of using such process effectively to identify leadership potential; and

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<p>and support these principles through leadership and by example.</p> <p><i>IFGG Standard 5: Develop the entity's capacity, including the capability of its leadership and the individuals within it.</i></p>	<ul style="list-style-type: none"> The Police and Crime Plan outlines the police and crime objectives (outcomes) and the strategic direction for policing. The Commissioner and the Chief Constable both have regard to the Plan; and Key departments e.g. Legal Services have acquired Investors in People status. <p>Chief Constable:</p> <ul style="list-style-type: none"> A medium term financial strategy has been jointly developed and is reviewed quarterly to support delivery of these plans; Information is provided by the Chief Constable's Professional Standards Department – this outlines major areas of organisational and the behavioural expectations for all staff; and The Force maintains an internal website which contains information and guidance on ethics and behaviour. 	<ul style="list-style-type: none"> Repeat of the staff survey by Durham University to support the wider wellbeing agenda.
<p>Fairness:</p> <p>The Commissioner, the Chief Constable, their officers and staff will act with fairness and impartiality.</p>	<p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none"> The Commissioner and Chief Constable strive to treat each other fairly, with dignity and with respect, and this is reflected in their agreed Decision Making and Accountability Framework within the MoCG; Duties are undertaken in accordance with the laws relating to human rights and equality; It is recognised that some individuals who come into contact with the police are vulnerable and that many require additional support and assistance; and A proactive approach is taken to opposing discrimination and this is reflected in the learning strategies of the force. 	<ul style="list-style-type: none"> The Commissioner has continued to drive efforts to achieve a more representative workforce - through recruitment, retention and progression of officers and staff members; Review and reinforce the procedures set out in the MoCG to ensure understanding and compliance; and Continuing to deliver and comply with the Joint Strategic Equality Plan.
<p>Respect:</p> <p>The Commissioner, the Chief Constable, their officers and</p>	<p>Commissioner:</p> <ul style="list-style-type: none"> The Commissioner is responsible for handling any complaints and conduct matters in relation to the Chief Constable, monitoring complaints against his staff, and monitoring the way in which Gwent Police complies with the requirements of the Independent Office of Police Conduct. 	<ul style="list-style-type: none"> Implementation and embedding of the changes to the complaints and discipline system introduced by the Policing and Crime Act 2017; and

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<p>staff will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy.</p>	<p>Chief Constable:</p> <ul style="list-style-type: none">• The Chief Constable manages all complaints against the Force, its officers and staff and ensures that the Commissioner is kept informed;• Serious complaints and matters to do with conduct are referred to the Independent Office of Police Conduct in line with the requirements of legislation;• The Police Staff Council has adopted standards of professional behaviour that reflect relevant principles enshrined in the European Convention on Human Rights and the Council of Europe Code of Police Ethics. These apply to all police staff;• The values of ‘protecting and reassuring’ are guiding principles for all staff and officers; and• In support of this standard, the Chief Constable requires all officers to remain composed and respectful (even in the face of provocation) and this is reflected in the force training undertaken. <p>Commissioner and Chief Constable:</p> <ul style="list-style-type: none">• Authority is only exercised in a way which is proportionate, lawful, accountable, necessary and ethical;• Implementation of the Code of Ethics and the oversight and recommendations provided by the Independent Ethics Committee; and• A system of Performance Development Reviews is in place for Police Officers and Police Staff. This process allows for focused performance review, and for the cascading and targeting of key objectives which are directly linked to the Police and Crime Plan and the Force Delivery Plan.	<ul style="list-style-type: none">• An amended performance development review process to be delivered from the start of 2020/21.
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