THE POLICE AND CRIME COMMISSIONER FOR NORTH YORKSHIRE AND THE CHIEF CONSTABLE OF NORTH YORKSHIRE

Integrated Offender Management

FINAL

Internal Audit Report: 6.17/18

19 December 2017

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19 December 2017

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1 EXECUTIVE SUMMARY

1.1 Background

A review of Integrated Offender Management (IOM) was undertaken as part of the approved internal audit periodic plan for 2017/18.

IOM is a nationally recognised scheme with guidance produced by the Home Office. It seeks to bring a cross agency response to crime and reoffending threats faced by local communities. It helps to improve the quality of life in communities by:

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

Previously IOM schemes nationally focussed on offenders who had committed serious acquisitive crime (SAC) classified as domestic burglary, theft of / from motor vehicle and robbery. The IOM teams had responsibility for managing offenders who were designated Prolific and Other Priority Offenders (PPO) and other statutory and non-statutory offenders. The process for acceptance on to the IOM scheme was generally via a referral from one of the IOM agencies; a matrix scoring exercise would then be completed followed by discussion at a partnership meeting.

In 2012 at the Home Office National IOM conference, schemes were showcased that included offenders who were managed under Multi-Agency Public Protection Arrangements (MAPPA). The inclusion of these offenders has now been mainstreamed with the Home Office advising all offenders can be potentially included in the scheme.

North Yorkshire developed their existing IOM model in June 2016 to include MAPPA level 2 offenders - violent offenders and in October 2017 registered sex offenders. Previously there was a single IOM Sergeant providing first line supervision to the teams, with the addition of MAPPA offenders. This supervision was replaced with area based Sergeants with IOM / MAPPA responsibilities. There are IOM officers across the Force area based in Northallerton, Harrogate, York and Scarborough managing c.242 offenders. Overall management of this scheme is aligned to Protecting Vulnerable People (PVP) portfolio and this comes under the remit of a Detective Superintendent.

IOM can be an effective partnership tool to help protect the public from some of the most dangerous offenders in an area. This review seeks to understand how the Force approach IOM at a strategic and operational level.

1.2 Conclusion

The key findings from this review are as follows:

- The Force can take assurance at a local level trained operational officers continue to work with partners (with varying partnership engagement levels) to manage offenders and protect the community.
- At a strategic level, there is a requirement to clarify and set the direction for IOM whether in a partnership setting or
 police setting.

Several partner agency staff were contacted to take part in this review, three agencies responded. One agency felt that they were unable to add anything to the review. P3, a charity that works intensely with offenders, were very happy with the scheme at an operational level but were unable to comment at a strategic level. The NPS contact agreed with the recommendations of this report across both the strategic and local levels. They were keen to be involved in the development of the scheme in the future.

Our review has identified the following areas for improvement which have resulted in **one high** and **two medium** priority management actions:

- With partners revisit IOM at a strategic level, if there is an appetite for a continued "integrated" offender management scheme, reinvigorate and where required redesign the scheme. If the strategic partnerships do not have an appetite or the resources to support a scheme (i.e. not integrated) consider the role that the police team will have within a wider offender management agenda. (High)
- Following strategic decisions, local schemes should be revisited to ensure they are supporting the IOM strategy
 and that operating guidelines and partnership involvement required are clear. There should be robust channels of
 communication to escalate challenge and share best practice to improve the local schemes across North
 Yorkshire. (Medium)
- Following the strategy work, the IOM performance framework requires redesign to identify appropriate performance indicators, measurements and reporting requirements. (**Medium**)

Internal audit opinion:

Taking account of the issues identified, the Police and Crime Commissioner for North Yorkshire and the Chief Constable of North Yorkshire can take partial assurance that the controls to manage this area are suitably designed and consistently applied.

Action is needed to strengthen the control framework to manage the identified area.



1.3 Additional information to support our conclusion

The following table highlights the number and categories of management actions made. The detailed findings section lists the specific actions agreed with management to implement.

Area	Control design not effective*	Non- Compliance with controls*	Low	Agreed action Medium	s High
There is a robust and measurable framework in place for dealing with different types of offenders and offences through a coherent multi-agency approach to deliver a response to local crime. Police and Crime Plan	0 (8)	3 (8)	0	2	1
Objective 2: Work more closely with criminal justice partners and local authorities to deliver a more joined up service.					
Total			0	2	1

^{*} 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.

2 DETAILED FINDINGS

Categorisati	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 regulatory scrutiny/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, regulatory scrutiny, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.									

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

Ref	Control Adequate Controls Audit findings and implications control complie design d with (yes/no) (yes/no)		Priority	Action for management		
Area	a: Integrated Offender	Manageme	nt			
1	There is an effective strategic IOM partnership supporting local	Yes	No	The IOM scheme in North Yorkshire is functioning at an operational level despite an apparent lack of high-level partnership strategic buy-in and reported reduced partnership involvement at a local level.	High	Work with partners at a strategic level to understand the appetite for a continued IOM scheme.
	delivery to reduce the reoffending of the cohort:			There is no current IOM partnership agreement and there is not a current agreed cross agency strategy. This change in partnership engagement at a strategic level could be as a consequence of transforming rehabilitation, confusion in the partnership following the refocused cohort (inclusion of		Agree the focus of IOM either at Chief Officer / senior partnership level or (if no partnership buy in) at Police Chief Officer / Senior
	 IOM partnership strategy; 			MAPPA) and within the police, the changing IOM portfolio alignment or simply a lack of resource.		level including the consideration of whether IOM focus should be e.g. SAC and MAPPA level 2 / 3
	 IOM multi-agency agreement; 			The Force has produced draft guidance that reflects the recent inclusion of the MAPPA level 2 cohort, however this is not a document that has been consulted upon in the partnership. Additionally, there is not a considered vision		offenders / offenders who are highest risk of reoffending / highest risk of causing harm to

Ref	Control	Adequate control design (yes/no)	Controls complie d with (yes/no)	Audit findings and implications	Priority	Action for management
	 Strategic and operational meetings are held to develop practice and assess performance; and Cohort is agreed by multiple agencies. 			for the development of the scheme following widening of the cohort, changes to the probation landscape and the introduction of new partnership organisations. Whilst the Force has made a determined effort to begin this transformational process, there are no dedicated IOM resources at a strategic level across the partnership and those senior police officers who have attempted to reinvigorate this work have responsibility for multiple areas including MAPPA. The Detective Superintendent has senior police responsibility for IOM and has 'bid' for support from the police central resources to assist with the reinvigoration of IOM. The Detective Inspector has arranged a strategic meeting with some partners to renew the interest due to take place in December 2017. Whilst strategic IOM meetings had ceased, operational meetings at a local area level are still scheduled. There are varying levels of attendance, CRC, NPS, housing and drugs and alcohol services were reported as core IOM members. Anecdotally there are difficulties with the attendance of NPS and CRC in a number of areas due to high caseloads and the movement away from designated 'IOM SPoCs' which were standard prior to transforming rehabilitation. The cohort is agreed via the partnership however there are two distinct channels: via the "traditional" IOM route, which consists of nomination, scoring against the matrix and partnership agreement. The second route is MAPPA level 2. Currently the managed cohort is IOM plus MAPPA level 2 nominals rather than the IOM scheme consisting of a cohort of individuals being managed on area who may also be subject to various statutory monitoring requirements e.g. MAPPA. The 'traditional' IOM matrix scoring document is still weighted towards SAC offenders whilst national best practice suggests focus should be on those		the community / prolific / statutorily managed etc. Develop an agreement, vision, strategy, plan, operating model (including refocused matrix) and performance measurements to support the clarification, reinvigoration and development of the IOM scheme either under the banner of offender management (developed and managed by the police if partners do not have an appetite for IOM) or integrated offender management (shared responsibility with partners). Responsible officer: Detective Superintendent Implementation date: April 2018

Ref	Control	Adequate control design (yes/no)	Controls complie d with (yes/no)	Audit findings and implications					Priority	Action for management	
				offenders who are the riskiest or cause the most harm to the community. MAPPA level 2 offenders are assigned to the IOM officers to provide resilience to the Offender Management Unit (OMU) assisting with the management of low risk sex offenders and level two violent offenders.						e	
				Risk Exposure Root causes							
				arrangemer	Risk that an ineffective partnership arrangement may lead to difficulty in managing the cohort which could Lack of senior level 'buy in'. Lack of partnership strategy.						
				Probability	impact on community safety.						
				Probable	Negligible	Significant	Significant	Negligible	3:13		
2	The local IOM scheme has developed in line with national best practice, including the following: Cohort reflects the offending profile of the force rather than purely SAC offenders; Training given to staff is relevant to	Yes	No	focus driven revisited and is still weight. The Detective taken added challenges a resources necurrently available. The operation with determine probation en They are co-	detailed above, the IOM scheme whilst moving towards a risk / harm based ous driven by the Police through the inclusion of MAPPA has not yet fully visited and agreed what offenders an IOM cohort should consist of and focus still weighted towards SAC offenders plus MAPPA level 2. The Detective Superintendent and Detective Inspector (MAPPA) have both ken added responsibility for IOM. They have sought to understand the hallenges and blockers and are keen to develop the scheme however the sources needed to consult, reinvigorate, plan and implement are not arrently available with the current team. The operational officers on area appear to continue to undertake their roles the determination despite challenges including, changing cohort, changing obation environment, changing first line supervision and senior supervision. They are co-located some with CRC and some with the NPS with varying					IS	Actions as above at a strategic level. Following strategic decision making, reinvigorate with or without partners (depending on appetite) at a local level includir improving channels for sharing best practice and escalating issues to a strategic level. Responsible officer: Detective Inspector
	the cohort managed;Co-location of IOM staff and co-			strong partne general parti team reporte	er but all agre cularly since d the high C	nent reported. ee that there ha the transformin RC workloads e work with the	as been less o ng rehabilitatio have resulted	f a focus on on changes. in the IOM o	IOM in One IOM fficers		Implementation date: April 2018

Ref	Ref Control Adequate Controls control complie design d with (yes/no) (yes/no)		complie d with	Audit findings and implications	Priority	Action for management
	management of cohort at an operational level; and			fulfilled by the CRC. Some teams reported difficulties with the CRC issuing breaches / recalls – there were concerns that one of these drivers could be the "payment by results" nature of the CRC contract.		
	 Clear links between IOM staff intelligence and neighbourhood policing. 			All operational staff members had received MOSOVO and VISOR training or were scheduled to undertake it. For some the training had happened virtually twelve months prior to them managing the MAPPA offenders and they suggested the training should have happened closer to the 'go live' date. Interestingly a new IOM officer described whilst they had received (or were due to receive) the MAPPA focussed training, they had received no training or handover for the "traditional" IOM element of the role.		
				One Neighbourhood Sergeant was clear on the current role of IOM. He had excellent links with his area IOM team who had desks in the neighbourhood office. The cohort was displayed on the office wall which assisted with targeted IOM / NPT actions. This area also had utilised special constables, led by the Neighbourhood Team and IOM staff, to target individuals causing harm to the communities. This Sergeant suggested that there are offenders who cause more harm to communities that the current IOM cohort including CSE perpetrators and those exploiting children in county line activities. A new Neighbourhood Sergeant had only been in post for a brief time moving into neighbourhoods from another policing operational area, she was not aware of what IOM was and she had not seen any information regarding the cohort in her neighbourhood office.		
				There was a varying picture regarding the relationship between IOM and the intelligence function. Some IOM officers reported the intelligence links were strong however this appeared to have been fostered by personal relationships rather than a considered strategy.		

Ref Control	Adequate control design (yes/no)	Controls complie d with (yes/no)	Audit findings and implications							Action for management
			In summary, it was clear that operational officers were passionate about the management of their cohort and were undertaking their roles with determination despite the challenges presented. They used innovative techniques including the creation of a boxing club and the utilisation of special constables for targeted operations. Whilst there were good personal relationships between the IOM officers and CRC staff, several times the phrase "we have a carrot but no stick" referencing frustrations with the enforcement element of licence conditions by the CRC which could leave the IOM scheme open to scrutiny. Greater ownership at a strategic level would provide an opportunity to explore and if necessary provide escalation of some of the shared and share best practice across the local schemes.							
				Risk Exposi	ure	Ro	ot causes			
			undertaken by area IOM schemes to reduce reoffending, influenced by factors other than agreed IOM operating practice and national best practice. strategic leads to strategic leads to reduce reoffending, influenced by factors other than agreed IOM environment of the responsibility of the responsibility of the reduced by factors of the responsibility of the reduced by factors of t			Lack of high strategic leven Inconsistent environment agreement of responsibilities	el. local partner / buy in / of roles and es.	ship		
			guidelines, consulted on across policing teams i.e. neighbourhood policing.							
			Probability Financial Reputational Operational Legal Rating							
			Probable Negligible Significant Negligible Negligible 3:13							

Ref	Control	Adequate control design (yes/no)	Controls complie d with (yes/no)								Action for management
3	IOM performance management is effective.	Yes	No	and Research strategic and a number of annual evaluation. The daily brid of the previor. This product. The manage format, there the data. This linnovation B updates. There is no preoffending by witnesses because of the strategic and the strateg	IOM performance management is currently unfocussed with the Intelligence and Research Officer trying to design information that may be helpful at both a strategic and operation level. The Intelligence and Research Officer produces a number of products including daily briefing, a six-weekly report and an annual evaluation of the performance of the scheme. The daily briefing has been developed by the officer and provides a snap shot of the previous day / overnight picture including intel and arrest information. This product was deemed extremely useful by operational staff. The management reports produced contained a lot of information in excel format, there were no indications of trends nor suggested actions as a result of the data. This data has been forwarded to the Business Development and Innovation Board (BDI) to date, no actions have been received following these updates. There is no performance scrutiny at a partnership board level i.e. reducing reoffending board, protecting vulnerable people board, or victims and witnesses board. Those with senior responsibility interviewed did not find the reports useful nor did those at an operational level.					Medium	As part of the strategic work design a new performance framework and template which informs best practice and gives senior leaders / managers a clear assessment of the performance of the scheme. (Suggest the monthly report is suspended prior to redevelopment of the framework as it appears to be of little value). Responsible officer: Detective Superintendent Implementation date: April 2018
					Risk Exposure Risk of not understanding how the scheme is performing against identified performance indicators. Probability Financial Reputational Operational Legal Rating Probable Negligible Minor Minor 5:8				Rating		

APPENDIX A: SCOPE

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

Scope of the review

The internal audit assignment has been scoped to provide assurance on how the organisation manage the following area.

Objective of the area under review

There is a robust and measurable framework in place for dealing with different types of offenders and offences through a coherent multi-agency approach to deliver a response to local crime.

Police and Crime Plan

Objective 2: Work more closely with criminal justice partners and local authorities to deliver a more joined up service.

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

Areas for consideration:

Integrated Offender Management (IOM) involves the Force and partners working together to deliver a local response to crime, targeting those offenders most at risk of reoffending and reducing the risk they pose to members of the community. In particular our review will consider the following:

- Review of how offenders are identified taking in to account multi-agency relationships to ensure a holistic view is provided.
- How the Force has developed from its previous position in which a significant majority of offenders were of
 acquisitive crimes to reflect the offending profile of the Force.
- Review of how individuals that fall below the IOM scoring requirements are identified and supported.
- Review of how staff training has changed to reflect the offenders dealt with by the Force.
- An assessment of the performance framework in place to determine the effectiveness of the IOM approach, how this has been reassessed if required and reported through the Force's governance structure.
- Establishment of strategic and operational groups to drive and co-ordinate IOM.
- The effectiveness of the links between IOM and front line operational policing / intelligence functions.
- How the Force links with partners, both statutory and non-statutory, to reduce the reoffending of the cohort.

The following limitations apply to the scope of our work:

- We will not comment on the assessment performed on offenders or validate the scoring as accurate.
- This will not replace or guarantee an assessment performed by the HMIC.
- We will not confirm the interventions that have been put in place will reduce reoffending or the most appropriate interventions have been put in place.
- Testing will be completed on a sample basis.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

APPENDIX B: FURTHER INFORMATION

Persons interviewed during the audit:

- Intelligence and Research Briefing Officer IOM
- IOM Officer
- IOM Officer
- P3 Charity
- National Probation Service

Documentation reviewed during the audit:

- IOM matrix document
- IOM Operating Guidance
- Quarterly performance report

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