



**THE POLICE, FIRE AND CRIME COMMISSIONER
FOR NORTH YORKSHIRE AND THE CHIEF
CONSTABLE OF NORTH YORKSHIRE**

Integrated Offender Management

FINAL

Internal Audit Report: 9.19/20

20 February 2020

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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 plan for 2019/20.

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

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

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 partner 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 began to redevelop their offender management for the management of MAPPA and IOM nominals in June 2016 to include MAPPA violent offenders and in October 2017 registered sex offenders. Previously, there was a single IOM Sergeant providing first line supervision to the teams across all of NYP, with the addition of MAPPA offenders, this supervision was replaced with area-based Sergeants with IOM / MAPPA responsibilities.

In 2018, North Yorkshire relaunched their offender management programme under the name "Trinity". The scheme has been influenced by the Norfolk/Suffolk offender management scheme with officers from North Yorkshire visiting Norwich to understand the key elements of that programme. The key differences of the new Trinity scheme when compared to North Yorkshire's previous scheme are:

- Consent is required from the offender to become part of the scheme;
- The cohort is much smaller and focussed; and
- Offenders are quickly de-nominated if the scheme is no longer relevant, i.e. prolonged non-compliance, 12 month or more prison sentence etc.

The Offender Management Operational Team now consists of public protection officers managing registered sex offenders and integrated offender management officers managing offenders who are part of the “Trinity cohort” and other MAPPA level 2 offenders where there is capacity. The offender management supervision aims to ensure all officers are omni competent (i.e. able to manage MAPPA 2 and IOM cohort) to provide resilience and greater capacity to the team.

Overall management of this scheme is aligned to the safeguarding portfolio and this is under the remit of a Detective Superintendent. At a senior operational level, offender management is led by a Detective Inspector. 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 has developed since the last review in 2017.

1.2 Conclusion

Whilst the comments and management actions agreed in this report do not appear to show much improvement from the last internal audit in 2017, we would suggest some context must be given:

Offender management has suffered considerable challenges over the past few years, nationally the number of MAPPA offenders in 2019 is 70% higher than in 2010¹. This increase in numbers also brings increased lead agency responsibilities and coupled with the reduction of officer numbers, through public sector austerity, the operating environment has been challenging. The National Probation Service (NPS) and Community Rehabilitation Companies (CRC) have also faced numerous challenges following the 2014 split from the national service into public and private companies. This year it has been announced, following Government reviews, that the NPS and CRCs will be renationalised under one service by the spring of April 2021 bringing further uncertainty to the probation landscape.

North Yorkshire Offender Management have recently launched Trinity, their new IOM scheme. They explained to RSM they were at the start of this project and fully accept that there are still areas of development. There was discussion whether to postpone this audit, however, operational supervision have welcomed this review to assist them, by providing an independent snapshot of their current position and helping to provide some direction.

There is a drive and determination from the Detective Inspector and her team to develop offender management in North Yorkshire and a full appreciation of the amount of work they have before them. The staff were honest in their interviews highlighting what wasn't working well and suggesting methods of improvement and senior operational supervision were keen to hear their opinions. The team should be commended with the spirit with which they have approached this audit during a challenging time.

IOM headline findings:

- The partnership buy-in to IOM appears to have further decreased since the last review in 2017.
- The strategic documents that were drafted in 2018 have not been finalised and are written from a policing perspective rather than as a joint multi-agency document.
- There is requirement to gather partners at a strategic level to establish whether there is a desire to run IOM as a joint scheme, with resourcing provided from all agencies, or whether the scheme will continue to be police led and revisited following the planned renationalisation of the NPS and CRCs.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843057/mappa-annual-report-2018-19.pdf

- There is no offender management operational guidance however there is a toolkit and a strategy document. Operational guidance should be written from a multi-agency perspective, if there is multi-agency buy-in and resources.
- The new IOM scheme Trinity requires offenders to consent to being part of the scheme and showing signs of wanting to rehabilitate. There is no current agreed and documented process/resource to target those who are prolific and chaotic and will not consent to being part of Trinity, but are not managed under MAPPAs. It is likely that this requirement will need to be resourced elsewhere in the Force but links to Trinity will be key.
- Offender management officers (PCs, CRC, NPS) all expressed concern regarding the dilution of the IOM officer role by the requirement for them to manage a mixed cohort of sex offenders and Trinity offenders. It is worthy of note however, the CRC and NPS also no longer have dedicated IOM staff. Operational supervisors are confident that this omni competent model can be successful.
- Performance management is much improved from the last review with additional activity being undertaken by the Detective Inspector to further develop this area.

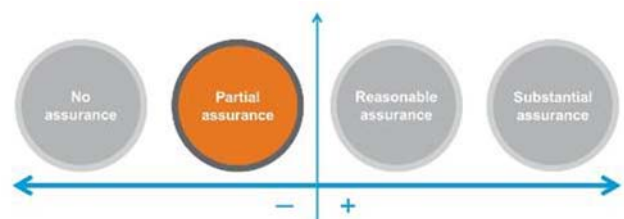
Our review has identified the following areas for improvement which have resulted in **two high** and **three medium** priority management actions:

- With partners, revisit IOM at a strategic level, if there is an appetite for a continued “integrated” offender management scheme and if appropriate resources can be provided to support the joint management of the scheme (in addition to attendance at meetings). If the strategic partnerships are not able to dedicate the time required to relaunch the scheme prior to the re-amalgamation of NPS/CRCs, the Force should continue to lead the scheme and potentially revisit this issue with probation partners in 2021, following the remerging of services. **(High)**
- Following strategic decisions, develop relevant strategic documents, for example; an agreement, a strategy, operating model / guidance. **(Medium)**
- Consider risks regarding conflicting priorities of MAPPAs offenders and IOM dual cohort management and develop guidance / mitigations to support operational staff. **(Medium)**
- Create and deliver a communication plan to share the new scheme with relevant stakeholders / referrers. **(Medium)**
- Consider where those who score high enough against the Trinity matrix but refuse to consent to be part of the scheme should be managed. Agree at a Force/partnership level and document the process, building it in to Trinity guidance. **(High)**

Internal audit opinion:

Taking account of the issues identified, the Police, Fire 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*		Agreed actions		
	Low	Medium	High	Low	Medium	High	
<p>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.</p> <p>Police and Crime Plan</p> <p>Objective 2: Work more closely with criminal justice partners and local authorities to deliver a more joined up service.</p>	4	(8)	(8)	1	0	3	2
Total	0	3	2				

* 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

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 control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
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Area: Integrated Offender Management

1	<p>Missing control</p> <p>The Force links at all levels with partners, both statutory and non-statutory, to reduce the re-offending cohort.</p> <ul style="list-style-type: none"> IOM partnership strategy; 	No	-	<p>The historic national success of IOM was attributed to the joint strategic leadership of the programme, joint working across multi-agencies both statutory and non-statutory and the co-location of police and probation.</p> <p>Clearly, the operating landscape has significantly changed since the national launch of IOM and resources have been depleted across the criminal justice arena. Unfortunately, in North Yorkshire these challenges have resulted in a more disjointed partnership approach than observed in the 2017 review. Whilst the Force still have identified IOM staff this does not appear to be common across the CRC and NPS following the transforming rehabilitation split.</p> <p>The lack of a joined-up partnership approach was echoed in the review by operational staff in both the Force and partners. There does however remain</p>	High	<p>Agree what resource (if any) partners can commit to at a strategic, managerial and operational level to develop the joint scheme including the preparation of strategic and operational documents. If CRC/NPS are not able to provide resource, determine whether a full or part time Force managed model can be used, which will be communicated. RSM suggest partners then aim to move back to joint</p>
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Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
	<ul style="list-style-type: none"> IOM multi-agency agreement; Strategic and operational meetings are held to develop practice and assess performance; and Cohort is agreed by multiple agencies. 			<p>an enthusiasm for an integrated approach from all agencies but challenges, mainly capacity, leading to the removal of joint working (in some areas) has led to a perception that organisations have withdrawn from a formal partnership. There are still examples of individuals from agencies informally working together, this however appeared to be as a result of existing relationships developed during co-location and is not embedded. All agencies reported that partnership working has been depleted since a) removal of permanent co-location predominantly due to the probation split through transforming rehabilitation b) removal of distinct IOM roles.</p>		<p>management at the creation of the new joint probation service in 2021.</p> <p>Responsible officer:</p> <p>Detective Superintendent</p> <p>Implementation date:</p> <p>31 March 2020</p>
				<p>Trinity is the newly branded North Yorkshire IOM scheme. The National Probation Service reported they were consulted during the development of Trinity, and the IOM Strategy draft document (June 2018) details this partnership ethos. Unfortunately, the Trinity draft strategy document authored by the Force has no links to NPS strategic priorities or CRC priorities and has not been finalised nor signed off at a partnership level.</p> <p>Whilst all senior managers spoken to at the Force/NPS/CRC indicate there is an appetite for IOM, dedicated resources are not currently possible. With the forthcoming re-amalgamation of NPS/CRC forecast for 2021, RSM would advise it is important to begin to work with CRC/NPS to ensure IOM is still on the partnership agenda. RSM suggest an IOM partnership agreement and agreed cross-agency strategy is developed using the Force draft document as a starting point.</p>	Medium	<p>If there is an appetite to jointly manage and resource Trinity, develop a joint agreement, vision, strategy, plan and operating model. If there is no ability to resource Trinity beyond providing referrals, then the Force will prepare a detailed police-led strategy and operational guidance, detailing the role of partner agencies.</p> <p>Responsible owner:</p> <p>Detective Inspector</p> <p>Implementation date:</p> <p>31 July 2020</p>

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				<p>The CRC operational staff reported they did not know who the new Trinity scheme sought to target, and that the referral form was too long to complete when they were unsure if they were referring the right people. They had therefore not referred individuals as they would have done with the previous scheme. The Force were aware referrals were low however this feedback of why, had not reached them. This evidences a potential area for development in communication between strategic, managerial and operational resources in the CRC, NPS and Force.</p> <p>Strategic IOM meetings have not been reintroduced, however the Detective Superintendent lead meets with his CRC/NPS counterparts on a monthly basis. RSM would suggest that this meeting is attended by the Detective Inspector to strengthen the strategic/operational links and other partners are invited as required to this meeting. Although outside the authority of the police, RSM suggests that CRC and NPS identify senior operational leads to work with the Force Detective Inspector to rebuild the partnership element of the scheme.</p> <p>The Trinity strategy document details several meetings:</p> <ul style="list-style-type: none"> • The Business, Development and Innovation Board (BDIB) should provide strategic governance to offender management although their remit is wider than this. From discussions with the Detective Superintendent and Detective Inspector whilst this board provides some governance it does not fulfil the full remit of an IOM strategic board. • The monthly panel meeting considers nominations and denominations and is headed by the Detective Inspector over the offender management unit this meeting has had some issues (following the launch of Trinity) 	Medium	<p>Develop a Trinity communication plan and timetable to document and direct how awareness of the programme will be increased in the Force and partner agencies.</p> <p>Responsible officer:</p> <p>Detective Inspector</p> <p>Implementation date:</p> <p>30 September 2020</p>

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				<p>with attendance from NPS and CRC however that issue now appears to be resolved.</p> <p>The Trinity matrix scoring document is no longer disproportionately weighted towards SAC offenders but falls in line with best practice, balancing offences including criminal damage/arson and violence including domestic violence against acquisitive crime to ensure a diverse cohort of offenders.</p> <table border="1"> <thead> <tr> <th>Risk Exposure</th> <th>Root causes</th> </tr> </thead> <tbody> <tr> <td>Risk that an ineffective partnership arrangement may lead to difficulty in managing the cohort which could impact on community safety.</td> <td> <p>Lack of strategic buy in and detailed cross agency strategic guidance.</p> <p>Lack of operational guidance.</p> <p>Lack of clear communication plan.</p> </td> </tr> </tbody> </table>	Risk Exposure	Root causes	Risk that an ineffective partnership arrangement may lead to difficulty in managing the cohort which could impact on community safety.	<p>Lack of strategic buy in and detailed cross agency strategic guidance.</p> <p>Lack of operational guidance.</p> <p>Lack of clear communication plan.</p>		
Risk Exposure	Root causes									
Risk that an ineffective partnership arrangement may lead to difficulty in managing the cohort which could impact on community safety.	<p>Lack of strategic buy in and detailed cross agency strategic guidance.</p> <p>Lack of operational guidance.</p> <p>Lack of clear communication plan.</p>									
2	<p>The local IOM scheme has developed in line with national best practice, including the following:</p> <ul style="list-style-type: none"> Cohort reflects the offending profile of the force rather than purely SAC offenders; Training given to staff is 	Yes	No	<p>The Force has now moved towards a risk/harm based focused through its offender management teams. Those managed through MAPPA and the Trinity cohort are managed by offender managers with expertise in both public protection and integrated offender management approaches.</p> <p>The new Detective Inspector (offender management) is working hard to further develop and improve the scheme. She has scheduled development sessions with the team to work through some current challenges and provide them an opportunity to share best practice as a team.</p> <p>The management of some sex offenders has been assigned to IOM officers to provide resilience within the Offender Management Unit (OMU). IOM officers reported they are managing approximately 30 sex offenders each, the majority were low risk offenders, however every IOM officer RSM interviewed also reported they were managing a high-risk sex offender.</p>	Medium	<p>Consider risks re the conflicting priorities of a MAPPA and an IOM workload and develop mitigations and guidance for officers managing both cases.</p> <p>Responsible owner: Detective Inspector</p> <p>Implementation date: 31 March 2020</p>				

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
	<ul style="list-style-type: none"> relevant to the cohort managed; Clear links between IOM, intelligence, front line, expedite teams and neighbourhood policing; and Offenders that fall under the IOM scoring requirements are identified and supported. 			<p>Operational level staff in the Force and partners expressed concern re the dilution of the IOM role. Two members of staff suggested it would be better to reduce the number of IOM staff, allowing a smaller number of IOM officers to work full time on IOM cases whilst increasing the number of PPO staff. These officers reported they enjoyed working with both cohorts of offenders however reported managing offenders from both cohorts at the same time was not practical.</p> <p>All operational police IOM officers reported that IOM was not a priority when balanced against the needs of managing MAPPA level 2 offenders meaning IOM has become a secondary role. The CRC/NPS also saw the perceived dilution of this role as negative, however both CRC and NPS acknowledged their organisations also did not have the capacity to have dedicated IOM staff any longer.</p> <p>As found during the last review operational staff members still received appropriate training (MOSOVO and VISOR) on appointment to the team.</p> <p>RSM met with one Neighbourhood Sergeant who did not know what Trinity was and suggested that the intranet was not the best way of communicating with officers, he suggested face-to-face briefings would be the most beneficial. IOM officers reported that their links with other parts of the organisation, such as intel and neighbourhoods has lessened since the move to Trinity with the focus only being on those who were mostly compliant and sex offenders.</p> <p>Several members of staff expressed concern at the consent requirement of the new Trinity scheme. National IOM teams historically managed several different cohorts including a cohort who was showing signs of wanting to rehabilitate and work with partner agencies to facilitate this change. In addition, they also managed those offenders who would not co-operate with</p>	High	Consider where the management of those prolific offenders who would have previously been part of the scheme but refuse to consent

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				<p>the Force but scored enough points on the matrix to be considered prolific or other priority offenders.</p> <p>The multi-agency teams led by the Force would then operate, disrupt and deter and/or catch and convict. It appears that this cohort who are the most prolific and chaotic and normally cause most harm to communities, do not currently have any intensive resource dedicated towards managing their behaviour to either try and bring them onto Trinity or disrupt, gather intelligence and catch and convict them to keep the public safe. This is of concern to partner agencies and operational officers.</p> <p>RSM asked the officers who had visited Norwich IOM (which is the basis for Trinity in North Yorkshire) how this disrupt / catch and convict requirement was resourced. It was reported in Norfolk and Suffolk there is a well-resourced catch and convict team tasked with managing the cohort who will not engage.</p> <p>Whilst there is not a catch and convict team in North Yorkshire there has been some use of the expedite teams to fulfil this role and there are other resources, such as the Force's public order teams who may have capacity to support this requirement. There is not however, a consulted, agreed and documented process across the Force of how these individuals will be managed in North Yorkshire.</p> <p>All individuals who are accepted onto Trinity must score above the matrix threshold. It was accepted that there was a requirement for those who fell below the threshold but wanted to rehabilitate to get support. The Commissioner has funded three supplementary IOM officers to work with these individuals. These IOM officers are currently managing a mixture of sex offenders and IOM offenders.</p> <p>All operational staff spoken to were passionate about Trinity however feel there is a great deal of work required to bring the scheme to life and are</p>		<p>(therefore can't be part of Trinity) should be managed.</p> <p>Agree at a Force/partnership level and document the process into the Trinity guidance.</p> <p>Responsible officer:</p> <p>Detective Superintendent</p> <p>Implementation date:</p> <p>June 2020</p>

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concerned about the gap caused by the “consent” element of the programme.

Risk Exposure	Root causes
Risk of inconsistent practice undertaken by area IOM schemes to reduce re-offending, influenced by factors other than agreed IOM operating practice and national best practice.	Lack of clear police operating guideline.

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 re-offending and reducing the risk they pose to members of the community. 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 re-offending 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 HMICFRS.
- We will not confirm the interventions that have been put in place will reduce re-offending 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:

- IOM Officer
- Offender Management Sergeant
- Offender Management Sergeant
- CRC/NPS officers
- CRC/NPS managers
- Neighbourhood Sergeant

Documentation reviewed during the audit:

- Trinity Matrix
- Trinity Draft Strategy
- Trinity Toolkit

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