THE CHIEF CONSTABLE OF NORTH YORKSHIRE

Ethics

Internal audit report 12.20/21

FINAL

26 May 2021

RSM

CONTENTS

Debrief held	8 April 2021	**Internal audit team**	Daniel Harris, Head of Internal Audit
Draft report issued	22 April 2021		Angela Ward, Senior Manager
Responses received	25 May 2021		Philip Church, Client Manager
			Michael Gibson, Assistant Manager
			Oliver Gascoigne, Internal Auditor
Final report issued	26 May 2021	**Client sponsor**	Deputy Chief Constable
			Assistant Chief Constable
			Detective Superintendent
		Distribution	Deputy Chief Constable
			Assistant Chief Constable
			Detective Superintendent

1 EXECUTIVE SUMMARY

With the use of secure portals for the transfer of information, and through electronic communication means, remote working has meant that we have been able to complete our audit and provide you with the assurances you require. It is these exceptional circumstances which mean that 100 per cent of our audit has been conducted remotely. Based on the information provided by you, we have been able to sample test the control framework.

1.1 Background

Following a recent PEEL inspection of the Force by Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services, (HMICFRS) a recommendation was highlighted in relation to 'how well does the force ensure that its workforce behaves ethically and lawfully?' An Area for Improvement (AFI) was raised by HMICFRS which stated that: 'The Force should take steps to make sure that officers and staff are aware of how to raise ethical issues.' The raising of this AFI has driven the Force to evaluate and review its ethical process, how ethical issues and dilemmas are raised and discussed and whether the process as a whole is fit for purpose. We have therefore completed this audit to determine whether the Force has a framework in place to allow for ethical concerns or dilemmas to be identified, raised and considered as part of the decision-making process.

Following the raising of the AFI, the Force has developed an independent ethics committee and an internal ethics committee, designed to help officers discuss ethical concerns or dilemmas and ensure that advice can be provided to management and the Office of the Police, Fire and Crime Commissioner regarding these problems. The independent ethics committee has been designed so that membership is expanded to include non-North Yorkshire Police professionals (such as those working in academia, the charity sector or in healthcare) which allows for external viewpoints from individuals who may have experience or a background relating to ethics or ethical problems. The internal ethics committee only contains staff from North Yorkshire Police and membership is granted to the chair of each vision group. The use of vision groups (groups designed to discuss and address general concerns and ethical problems on a local level) has also been expanded within the Force and are used to help feed in any problems to the internal ethics committees.

As part of the audit, a questionnaire was designed and completed by 123 officers from the County and Coast Command. This area was selected as a vision group had been active here for a number of years. The questions covered vision groups, the ethical culture at North Yorkshire Police and the anonymous messaging service. The results of the questionnaire have been provided to management and a summary can be seen in Appendix A.

1.2 Conclusion

As the independent ethics committee has not had its inaugural meeting and the internal ethics committee has only met once, our testing has been somewhat limited. Whilst we recognise the progress that has been made to develop and establish a process to address the AFI identified in the HMICFRS Peel Assessment and ensure that staff are comfortable discussing ethical issues and dilemmas, it must be noted that the ethics process is currently at an early stage and further improvements should be made, particularly with regards to the terms of reference to ensure that the ethics committee and related structures are sufficiently described.
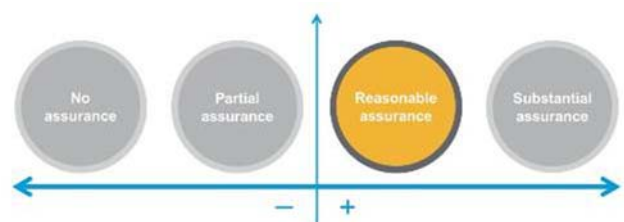
Additionally, whilst the survey provided some positive responses, it also produced a range of more mixed responses which suggest that there is still some way to go to ensure that this process is fully embedded and provides confidence to officers and staff that ethical matters will be handled appropriately, and anonymously, where required.

As a result of our review we have agreed **one medium** and **three low** priority management actions.

Internal audit opinion:
Taking account of the issues identified, the Chief Constable of North Yorkshire can take **reasonable assurance** that the controls in place to manage this area are suitably designed and consistently applied.

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

1.3 Key findings

We noted the following areas for improvement, resulting in **one medium** priority management action:

- The questionnaire was issued to officers within the County and Coast Command and saw over 100 respondents answering questions related to vision groups, the anonymous messaging service and the ethical culture at North Yorkshire Police. A summary was provided in Appendix A. Whilst the survey findings revealed some positive responses, there were also some more mixed responses, suggesting that that there is still some way to go to ensure that this process is fully embedded and provides confidence to officers and staff that ethical matters will be handled appropriately, and anonymously, where required. **(Medium)**

Details of the low priority management actions can be found under section two of this report.

We have identified the following controls that were well-designed and consistently applied.

- We confirmed that terms of reference exist for the vision groups, the internal ethics committees and the independent ethics committees. Through testing, we can evidence that the terms of reference are closely aligned with those of other forces in the surrounding regions, particularly on areas such as meeting frequency and committee responsibilities. We also tested the membership of other Forces' committees compared to the membership of six for the North Yorkshire Police independent ethics committee. From testing we noted a wide range of membership across the different forces from as low as five to as high as 16 members.

- We evidenced that for the inaugural internal ethics committee meeting, an action log was completed and is available to staff. The content of this action log was in line with responsibilities set out within the terms of reference. We also tested a long-standing vision group and whether an action log has been completed and is available. In this instance it was clear that the action log was available to staff and had been completed. The actions detailed were all in line with the responsibilities set out in the terms of reference.

- The use of external members in the independent ethics committee was considered and we evidenced documentation that shows a number of individuals have been considered for the position. Whilst we were unable to confirm if they have attended the independent ethics committee (as it has not yet met) it is clear that the process has been examined and plans have been completed to ensure that the independent committee can meet with an appropriate set of members.

- We conducted a walkthrough and testing of the anonymous messaging service to ensure that it remains anonymous and is accessible and available to all staff. From testing, we confirmed that the service is easy to access (through the intranet homepage), sufficient guidance has been provided to users (through a FAQ document and a step by step guide) and the service does not gather or store any identifying information. The process used to assess any problems or dilemmas is sufficient and ensures the accurate recording and timely response to any information provided.

1.4 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
Ethics	1	(8)	2	(8)	3	1	0
Total					**3**	**1**	**0**

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

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.

Please find our detailed observations below:

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for Management
1	Terms of reference have been created that are similar and in-line with other forces in the area.	Yes	No	We obtained the terms of reference for the command-level vision groups, the force-level internal ethics committee and the independent ethics committee (for the Office of the Police Fire and Crime Commissioner). We compared the terms of reference for North Yorkshire Police's ethics committees to other ethics committees/panels, including Cumbria, Cleveland, the West Midlands, Humberside, West Yorkshire and South Yorkshire have been compared. From this review we noted that the terms of reference are closely aligned with those of other forces in the surrounding regions, particularly on areas such as meeting frequency and committee responsibilities. However, we noted some difference and other observations during the course of this review, as follows: Membership: We found that having independent members of the local community was a common theme that appeared throughout the other forces' ethical committees' terms of reference.	Low	The terms of reference of vision groups, the internal ethics committee and the independent ethics committee will be updated as appropriate to ensure that they adequately reflect: • Reference to the requirement that independent members (members that are not part of North Yorkshire Police) are required to sit on the committee to

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for Management
				We were informed by the Detective Superintendent that members of the public have agreed to sit on the independent committee, and that recruitment is already underway with three members having already agreed to be part of the committee. These three individuals come from an academic and healthcare background. However, we noted that there was no mention of this within the terms of reference for the independent committee and that the membership requirements for the internal ethics committee only specifies that membership will include a variety of commands and functions (with responsibility for ethics and "Vision Groups"). Upon further discussion with the Detective Superintendent, we were informed that this refers to the Chairperson of each vision group. As the action log does not specify who was present at the inaugural meeting, we were unable to confirm whether the relevant members were present. Reporting structure: No reporting has currently been completed as the independent committee has not yet met and the internal committee has only met once as of the week of the audit. As such we have not been able to test or confirm that reporting is provided to the Chief Constable or the OPFCC. With regards to a reporting framework, the independent ethics committee terms of reference do not refer to a reporting structure and there is no mention of the OPFCC receiving reports of the meeting. However, there is a requirement that a Chief Officer and the Head of Professional Standards attend each meeting. The internal ethics committee terms of reference require the Chairperson to meet with the Deputy Chief Constable on a quarterly basis however there is no mention of any contact with the Office of the Police, Fire and Crime Commissioner. The Detective Superintendent has informed us that the reporting structure should be that the Chief Constable and the OPFCC are informed of any discussions and advice through minutes and relevant reports provided by the Chair of each committee.		ensure its independence and objectivity. • The reporting structure that has been implemented and discussed during meetings. • The chair for each vision group is a member of the internal ethics committee and the chair of the internal ethics committee is a member of the independent ethics committee. **Implementation date** 31 July 2021 **Responsible owner** Detective Superintendent

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for Management
				We have been informed that this will be discussed at the next independent ethics committee meeting and will be included in the approved terms of reference.		

How the groups and committees in the ethics process feed into each other:

Each vision group has a chair who is responsible for running each meeting and who is also a member of the internal ethics committee. Any dilemma, question or enquiry that is discussed at a vision group can be brought to the internal ethics committee to be discussed. The chair of each vision group also has the responsibility to provide a summary of the discussions and findings to the internal committee. This allows for direct linkage between the vision groups and the committees.

Membership of the internal ethics committee for all vision group chairs is indirectly mentioned within the terms of reference for the internal ethics committee however it is not mentioned within the vision group terms of reference.

The Chair of the internal ethics committee is also a member of the independent ethics committee and can decide whether an item or question should be brought to the independent committee. We have not been able to test this as the independent ethics committee has not yet met.

The Chair of the independent committee is also responsible for providing reports and updates to the Chief Constable and the OPFCC however we have not been able to test this as the committee has not yet met. We have been informed that this will be included in the terms of reference which are due to be discussed and approved at the next meeting.

Failure to have the linkage between vision groups and ethics committees set out in their respective terms of reference could potentially undermine how the various groups work together and lead to confusion and disagreement with regards to membership and responsibilities.

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications		Priority	Action for Management
				Risk exposure	**Root cause**		
				There could be some confusion over the correct membership, reporting structure and how the ethics process feeds into each other. If officers are unaware of this, they may be less likely to discuss ethical dilemmas or attend which would also reduce the effectiveness and positive impact of the ethics committees. There is also a risk that the committee may not be adhering to its responsibilities.	The ethics committees' terms of reference have not been updated to reflect the membership, reporting structure and how they feed into each other.		
2	Membership and attendance for both the internal and independent ethics committees is in line with the established terms of reference and includes internal and external members.	Yes	No	We were informed by the Detective Superintendent that the inaugural meeting of both the internal ethics committee and the independent ethics committee consists of an induction on the overall process, discussion on how issues are escalated and agreement on the terms of reference. However, there has been no agreement what formal training will be provided to non-NYP committee members outside of the induction provided in the first independent ethics committee meeting. From the testing we conducted comparing terms of reference for ethics committees of other areas, only one out of the six forces we looked at (Humberside) mentioned training and this only referred to "familiarity training" for the Chairperson.		Low	We will introduce a process to ensure that training/induction is provided for all new independent members in future, and update the independent ethics committee terms of reference to reflect this. **Implementation date** 31 July 2021 **Responsible owner** Detective Superintendent
				Risk exposure	**Root cause**		
				There is a risk that members do not have the sufficient training to carry out their duties and responsibilities.	Reference to induction training and general training for independent members is not included within the terms of reference for the independent ethics committee.		

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for Management
3	**Missing control** There is no approved criteria framework to assess ethical dilemmas.	No	-	Upon discussion with the Detective Superintendent we were informed that there is no approved criteria framework in place to help assess ethical dilemmas during ethics committees. Instead, it was decided that academics would be involved with discussions and have a voice on the independent ethics committee to provide their own framework from an academic perspective. However, we noted that this is not mentioned within the independent ethics committee terms of reference. Upon checking the North Yorkshire Police, Fire and Crime Commissioner website, we found an ethics framework which outlines the standard that the OPFCC, the Chief Constable and the Joint Independent Audit Committee are committed to achieving. This framework has not been included within any of the terms of reference (for either the ethics committees or the vision groups). This framework uses the Nolan principles – seven key principals for those holding public office. We assessed a number of other Forces and whether they have their own ethical framework which is used to assess any ethical dilemmas. Greater Manchester Police, Essex Police and Cumbria Police all have an ethical framework which is used to help answer any ethical questions or dilemmas that may arise. From this assessment we discovered: • Both Cumbria Police and Essex Police have a similar ethical framework to the one on the North Yorkshire Police's website for the PFCC. They both use the Nolan Principals for their framework. • Cumbria Police's ethical framework is an older document and was last updated in 2017 • Greater Manchester Police have commissioned a local university to produce their own ethical framework and it should be noted that GMP believe they are the first force to have their own corporate ethical framework. As the independent ethics committee has not yet met and there is currently no written framework in place, we have not been able to take a sample of decisions nor have we been able to compare them against such a framework.	Low	A criteria framework will be discussed and considered by the internal and independent ethics committee. If a framework is adopted, it will be detailed within the terms of reference. **Implementation date** 31 August 2021 **Responsible owner** Detective Superintendent

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications		Priority	Action for Management
				Risk exposure	**Root cause**		
				There is a risk that without a criteria or ethical framework, inconsistent advice could be provided which could undermine the ethics process as a whole.	Failing to have a criteria or ethical framework to assess problems or dilemmas.		
4	A questionnaire has been created to consider the viewpoints of officers within the County and Coast Command with regards to ethics.	-	-	A questionnaire was issued to officers within the County and Coast Command which saw 123 respondents answering questions regarding their opinion on vision groups, the ethical culture at NYP and the anonymous messaging service. This command was selected on the grounds that its vision group was the most well established and, therefore, it was hoped that the responses would be most representative of the process, rather than a command where the vision group had only recently been set up, or had not yet been set up. A summary of the results can be seen in Appendix A. The raw data for this questionnaire has been sent to management to assess. Whilst the survey findings revealed some positive responses, such as 69% of respondents agreeing or strongly agreeing that they would feel comfortable attending a vision group, there were also some more mixed responses, including: • Only 37% of respondents stated they were aware of the vision groups. • Only 14.6% of respondents stated they had seen communications about the ethical process. • Only 39% of respondents stated they agreed or strongly agreed with the statement that organisational culture encourages discussions on ethical dilemmas encountered. • Although 55% of respondents either agreed or strongly agreed that they would feel confident using the anonymous messaging service if they had an ethical dilemma or question, concerns were still voiced in narrative responses over the perceived anonymity of the service.		Medium	We will consider the results of the questionnaire on vision groups and the ethical culture in place. Where areas for improvement and/or areas where officers disagreed / strongly disagreed with the questionnaire, we will investigate these areas further and agree further actions to address these issues. **Implementation date** 30 June 2021 **Responsible owner** Detective Superintendent

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for Management
				Whilst we recognise the improvements made across the Force in addressing ethical matters, these responses suggest that there is still some way to go to ensure that this process is fully embedded and provides confidence to officers and staff that ethical matters will be handled appropriately, and anonymously, where required.		

APPENDIX A: 4QUESTIONNAIRE

A questionnaire was issued to officers within the County and Coast Command to evaluate the support of the vision group meetings, the anonymous messaging service and assess the ethical climate within North Yorkshire Police. The County and Coast Command was selected as it has a long-running vision group compared to the rest of the Force. We received 123 responses to the questionnaire which we have summarised below.

A text box was available under all strongly agree / strongly disagree answers to allow respondents to submit further detail to support their response provided. Owing to the volume of responses we have selected only a cross-section to include within this appendix. However, the full set of responses have been provided to management.

Analysis of Findings

I am aware of the vision groups that have been set up across the force to help staff with ethical problems or questions?

Of the 123 responses, 46 (37%) respondents said yes, 64 (53%) said no and 13 (10%) replied don't know.

I support the set-up of a vision group to discuss ethical dilemmas and ask related questions.

Of the 123 responses, 25% said they strongly agreed and 55% said they agreed with only 7% of respondents saying that they disagreed and 2% saying they strongly disagreed 15% replied that they didn't know. This clearly shows strong support within the area surveyed for the set-up and use of vision groups. 36 respondents provided an answer, we have selected three responses which state that:

'Ethics stands at the forefront of every decision the police make, however the input and training offered in this area is almost non-existent. Discussions would assist in growth/development in this area.'

'Such matters are obviously important and sensitive, so having access to the best advice is necessary.'

'I am aware of some, but they don't seem to reach out to everyone.'

I would feel comfortable attending a vision group to listen to the discussion.

Whilst 69% of respondents either agreed (56%) or strongly agreed (13%) that they would feel comfortable attending a vision group meeting to listen to the discussion, there was a small minority of individuals who either disagreed (12%) or strongly disagreed (6%) that they would feel comfortable. A further 13% replied with don't know. Some comments to support these responses include:

'I would be interested to hear from others on ethical dilemmas.'

'I have attended one meeting. It was poorly attended.'

It doesn't appear to be inclusive and doesn't support everyday people.

I would feel comfortable attending a vision group if I had an ethical question.

Again, similar to the previous questions, a majority of respondents agreed (52%) or strongly agreed (8%) that they would feel comfortable attending a vision group if they had an ethical question. However, a larger minority disagreed (19%) or strongly disagreed (5%) that they would feel comfortable. 16% responded with don't know. Some of the responses to this question included:

'Sometimes speaking out can be seen as being a troublemaker.'

'Personally I have no problem raising an ethical question. My problem is that whenever these problems are raised then nothing ever happens with it.'

'I would go through my Line Manager or Union'

'It is always better to seek advice where there is a knowledge gap.'

I have attended, participated or submitted a question to the vision group.

Of those that answered the questionnaire, only 10% said yes, they have attended, participated or submitted a question to the vision group. 89% said no and 1% said they did not know.

I have seen internal communications (such as newsletters) about an ethical question and the response to the question.

Only 14.6% of respondents answered yes with 71.5% answering no and 13.8% answering don't know. This indicates that, of the respondents that completed the survey, most have not seen internal communications about ethical questions.

The organisational culture at North Yorkshire Police encourages discussions on ethical dilemmas encountered.
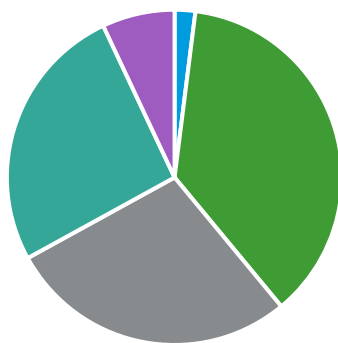
- Strongly agree
- Agree
- Don't know
- Disagree
- Strongly disagree

The organisational culture at North Yorkshire Police encourages discussions on ethical dilemmas encountered.

The response to this question was more divided than previous questions. Only 39% of respondents agreed (37%) or strongly agreed (2%) with the statement that organisational culture encourages discussions on ethical dilemmas encountered. A further 7% strongly disagreed and 26% disagreed. 28% of respondents answered don't know. A selection of responses to this question can be seen below. Several responses referred to individuals being afraid to discuss ethical dilemmas in case they 'said the wrong thing' or had differing views to those in more senior positions.

'NYP does encourage open discussion, there has definitely been a move to a learning rather than blame culture.'

'I agree with this from a PC level, that ethical problems are discussed and raised when necessary. However, I feel it is more difficult to raise concerns regarding management ranks (Inspector and above) should officers raise concerns regarding these ranks I feel it is often not listened to and not dealt with appropriately. It seems to be forgotten that Sgts, Inspectors and above should be subject to performance management regarding some of the behaviours and choices.'

'I believe there is a willingness at PC, Sgt and some Inspector level but it is often dependant on the individual staff member who would be involved in being open to ethical dilemmas within the force, and being open to accept these, and look for change. I am not confident that the SMT support this in any meaningful way.'

I am aware of the anonymous messaging service that can be used to raise ethical dilemmas.

A large majority of respondents (82%) said yes, they were aware of the anonymous messaging service with only 15% stating no, they were not aware and 3% replying with don't know.

I would feel confident using the anonymous messaging service if I had an ethical dilemma or question.

More than half of respondents either agreed (43%) or strongly agreed (12%) that they would feel confident using the anonymous messaging service if they had an ethical dilemma or question. Despite this, 25% of respondents disagreed and 8% strongly disagreed that they would feel confident. Don't know was selected by 11% of respondents.

We have selected a range of comments that were left regarding this question. As seen in the first statement, there were a number of comments that stated the service was not anonymous as well as several comments stating that if any problems should be followed through the correct channels rather than anonymously. There was also one comment that addressed the Force's new keystroke monitoring system (which monitors and records every keystroke that is typed into a North Yorkshire Police computer) and raised doubts about how the messaging service would remain anonymous if monitoring was underway. We have been informed that the keystroke monitoring system is disabled when an individual accesses the messaging service however this raises some questions on whether staff have been informed and are aware of this.

'I do not think that it is anonymous.'

'I have used the anonymous messaging service but I have not seen any change to the issues I raised which has left me somewhat negative about what the process is and how do you get feedback to say that the issue/s raised have been addressed'

'I feel more confident using anonymous messenger and have done so. The reason for this is that I do not trust in my line management that any issue raised around ethical dilemmas are dealt with accordingly and are often swept under the carpet to summarise, where there is clearly a case to answer. If you cannot trust your line management to support and deal with any issues this is the only medium of raising an issue. If you do raise an issue it is often the case that you are made to feel like the person who is in the wrong when reporting matters and from personal experience are made to feel like you are the person causing the problem, when actually the problem is with the person / matter you are raising. Anonymous Messenger is sometimes the only way of reporting things without fear

that you will be overtly named and shamed as a whistle blower, when you have had no choice to do so under the Standards of Ethics and Professional Behaviour.'

I would feel confident in North Yorkshire Police's handling of an anonymous question/dilemma, if I was to submit one.

37% of those that completed the survey agreed and 8% strongly agreed that they had confidence in North Yorkshire Police's handling of an anonymous question or dilemma if they were to submit one. 20% disagreed, 11% strongly disagreed and 25% stated don't know.

'Depends on the person handling the question/dilemma. I reported bullying and it was not handled very well.'

'Its anonymous so why wouldn't I? Otherwise what is the point of submitting a concern. There is some scepticism/lack of trust within the police rank and file that this is not an anonymous service, I personally am satisfied that it is.'

'Overall I do have confidence in the Force's intention to handle the most serious matters in the most correct and professional manner possible. I did look at the anonymous messenger service at one point and did feel satisfied that it would provide the necessary confidentiality if required, indeed nothing would destroy confidence quicker if someone was to use it and find out if that was not in fact the case.'

'I disagree because I'm aware of the backlash others have experienced after submitting an anonymous message. I think the idea in principal is good to give those a voice that may otherwise worry.'

APPENDIX B: 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 Chief Constable of North Yorkshire manages the following area.

Objectives of the area under review
The Force has a framework in place to allow for ethical concerns / dilemmas to be identified, raised and considered as part of the decision-making process.

Areas for consideration:

As part of the recent PEEL inspection the Force was highlighted as 'requires improvement' in relation to 'how well does the force ensure that its workforce behaves ethically and lawfully?' In particular the following AFI was raised: 'The Force should take steps to make sure that officers and staff are aware of how to raise ethical issues.' Our review will focus on the following areas:

- Terms of reference have been established and approved for the ethics committee. Through substantive testing we will confirm the ethics committee have discharged their duties. We will benchmark the ethics terms of reference against sector peers.

- The ethics committee is appropriately attended by both internal and external stakeholders.

- There is clear reporting and advice provided by the ethics committee to the Chief Constable and the Office of the Police, Fire and Crime Commissioner.

- An approved criteria framework is in place to assess ethical dilemmas.

- There is clear link between the ethical decisions made in a command area and those raised as dilemmas with the ethical committee.

- How internal governance (e.g. other committees) feed into and are inter-linked with the ethics committee.

- How other external and / or scrutiny arrangements identify ethical issues for the committee.

- There is an appropriate system / mechanism in place to report ethical dilemmas. We will confirm that staff are aware of forums available to raise ethical dilemmas (this will be achieved through our 4questionnaire software tool) outside of supervisor responsibility.

- We will assess the mechanism used to record ethical dilemmas raised by staff and whether this is anonymous.

The following limitations apply to the scope of our work:

- We will not review the recruitment and selection of ethics committee members.

- We will not review the adequacy of the assessment criteria.

- Our review will not guarantee future HMICFRS opinions in this area.

- We will not review compliance with the Code of Ethics.

- We will not interview staff as part of this process to ascertain their understanding of ethics.

- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

APPENDIX C: FURTHER INFORMATION

Persons interviewed during the audit:

- Detective Superintendent
- A member of the Integrity Team

Documentation reviewed during the audit:

- Ethics committee terms of reference (internal and independent ethics committee and vision groups)
- Internal ethics committee action log
- Ethics committee terms of reference for other Forces
- Vision group minutes
- Email confirmation of external membership for independent committee
- College of Policing Code of Ethics
- Ethical frameworks from other forces
- FAQ document and step by step guide for the anonymous messaging service
- Questionnaire results
- Professional Standards Confidential Reporting Whistleblowing Procedure V4
- Professional Standards Integrity Unit (PSIU) Assessment Matrix

FOR FURTHER INFORMATION CONTACT

Daniel Harris, Head of Internal Audit

Tel: 07792 948767

Daniel.Harris@rsmuk.com

Angela Ward, Senior Manager

Tel: 07966 091471

Angela.Ward@rsmuk.com

Philip Church, Client Manager

Tel: 07528 970082

Philip.Church@rsmuk.com

rsmuk.com