



Denbighshire Internal Audit Services
Caledfryn, Smithfield Road, Denbigh LL16 3RJ

Community Safety Partnership (Governance Framework)

January 2015



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Purpose & Scope of Review

We carried out this review to seek assurance on the Community Safety Partnership for input to the Council's Annual Governance Statement. The scope of our review did not look at the partnership's work or its performance, but covered the following areas:

- Reporting
- Governance Arrangements
- Risk Management
- Financial Management

Assurance Rating (Based on areas reviewed)

	High Assurance	Risks and controls well managed
	Medium Assurance	Risks identified but are containable at service level
	Low Assurance	Risks identified that require meeting with Corporate Director/Lead Member
	No Assurance	Significant risks identified that require member / officer case conference

Audit Opinion

Our discussions with the Community Safety Partnership (CSP) Manager identified that partners are engaged and committed to the partnership, for example, in providing printing services free of charge for crime prevention events, which otherwise would be a cost to the Council. They are also proactive in putting in place measures to reduce or prevent crime through developing actions plans as part of their task and finish groups.

There is a clear structure in place for delivering the partnership but there are several groups to report to and this could lead to duplication of information provided. The arrangement also lacks cohesion through a lack of clarity of roles and responsibilities and documented procedures to ensure that its governance arrangements are robust. Improvements in this area will also help to ensure that decisions are made at an appropriate level and that each group fulfils its terms of reference.

There is a documented Communication Plan so the partnership can engage with its partners and the community; however, there is still work to be done to ensure that the partnership communicates effectively with its stakeholders. Reviewing the level of information that is provided to the attendees at meetings, and how it is presented, will ensure that partners are better informed to make decisions more efficiently.

The other key area for improvement is with the financial management of the grants. There are underspends accumulating within two grants, with delays emerging in taking action to deal with the underspend. Financial reporting by the CSP Manager could also be more comprehensive to ensure that all key information in relation to the grants is reported on.

The CSP Manager is clearly enthusiastic and committed to the work that the CSP does, and the risks/issues that we have raised will strengthen partnership arrangements and should reduce any duplication or inefficiency in her work or within the structure.

Action Plan

Audit Review of: Community Safety Partnership
Date: January 2015
Action Plan Owner: Community Safety Partnership Manager

Corporate Risk/Issue Severity Key	
	Critical - Significant CET and Cabinet intervention
	Major - intervention by SLT and/or CET with Cabinet involvement
	Moderate - Containable at service level. Senior management and SLT may need to be kept informed

Risk/Issue No.	Risk/Issue	Action	Who	When
1.	The reporting process within the CSP structure could be more efficient to ensure that people attending meetings are not inundated with unnecessary information, which could lead to poor decision making. Additionally, the quality of the minutes taken at meetings could be improved to clearly show where approval has been given and decisions made, and to include timescales for implementation of actions.	<p>I will ask the members what information they require.</p> <p>We also have had an offer of a minute taker for 12 months from North Wales Police, which will improve the quality and consistency of minutes. The minute taker has already started and has produced the Implementation Group minutes, which were very comprehensive.</p>	CSP Manager	<p>Members will be consulted in February 2015, at first with a hope of having an agreement in place by June 2015.</p> <p>In place</p>

Risk/ Issue No.	Risk/Issue	Action	Who	When
2.	<p>Despite having terms of references, there is a lack of clarity of the roles and responsibilities within the CSP structure. Both the Strategic Group and Implementation Group have previously discussed finance and performance, but the Strategic Group does not consider that finance is part of its remit. There is also a lack of evidence that the Strategic Group is meeting its responsibilities detailed within its terms of reference, or that it is acting as a 'critical friend'. The CSP structure would benefit from a review to ensure that there is no duplication or inefficiency.</p>	<p>This review will begin in the February 2015 meeting and as part of establishing a partnership agreement.</p>	<p>CSP Manager</p>	<p>November 2015</p>
3.	<p>There is a lack of robustness within the governance arrangements of the CSP as:</p> <ul style="list-style-type: none"> • there is no partnership agreement; • terms of reference need to be reviewed; • there is no scheme of delegation or decision making protocol to ensure that decisions are made at an appropriate level; and • there is no documented process for dealing with conflicts of interest or for escalating any problems that might arise within the partnership. <p>Inadequate governance arrangements may leave partners vulnerable to risk exposure from poor decision making.</p>	<p>The Partnership Agreement is already in the process of being drawn up, and will include other governance arrangements as mentioned. Several meetings have been arranged with both local authorities to enable there to be a draft document to share with partners before the next CSP meeting. There will also be a review of the terms of reference that are already in place.</p>	<p>CSP Manager/ CSP members</p>	<p>This has already started in December 2014, and is hoped to be completed by November 2015.</p>

Risk/ Issue No.	Risk/Issue	Action	Who	When
4.	<p>Risk management arrangements need to be more effective to ensure that the impact of any risks is considered when making key decisions.</p> <p>Denbighshire County Council (DCC) also needs to ensure that it has an effective mechanism for capturing partnership risks. This may also be relevant for Conwy County Borough Council (CCBC) if arrangements are not already in place.</p>	<p>We will be changing the reporting template to include risk. The next CSP meeting in February 2015 will have new reporting forms, which will show a risk dashboard for the funds.</p> <p>Partnership risks will be considered during the Business Improvement & Modernisation business planning activities for 2014-2015 and reviewed regularly through this mechanism.</p> <p>CCBC monitors partnership risks on a quarterly basis via the accountant and the six monthly partnership service review. All risks are discussed with the Chair of the CSP present.</p>	CSP Manager/ Partnerships Manager DCC	<p>April 2015</p> <p>In place</p>
5.	<p>There is a lack of robustness within the grant financial management process as:</p> <ul style="list-style-type: none"> underspends have been left to accumulate and prompt action has not been taken to deal with them leading to retrospective approval being sought from the Welsh Government; and there is a lack of documented procedures so that all parties are clear of their financial roles and responsibilities for the partnership. <p>Additionally, the reporting process needs to be more transparent, as there is no reporting of the Domestic Abuse Services Grant (DASG) to the Partnership Scrutiny Committee or the Strategic Group. The underspend on the Police & Crime Commissioner fund does not appear to have been reported on either. Inadequate financial arrangements could leave the CSP vulnerable to challenge and lead to additional scrutiny by funding providers.</p>	<p>The DCC finance team will keep the CSP Manager updated on all spending and highlight any potential underspends promptly. This will be underpinned through monthly finance meetings between the Partnerships Manager and the DCC finance officer.</p> <p>All of the claims for DCC funding managed by CCBC will be also shared with the DCC finance team by the CSP Manager.</p> <p>The Domestic Abuse Officer spend will be added to the project plan and reported on in the Strategic Group and any other scrutiny meetings. Members will also be consulted on what financial information they require.</p>	<p>CSP Manager/ Denbighshire Finance Team</p> <p>CSP Manager</p> <p>CSP Manager</p>	<p>In place</p> <p>June 2015</p> <p>June 2015</p>

Risk/ Issue No.	Risk/Issue	Action	Who	When
		The Welsh Government has approved the retrospective allocation of the DASG underspend to the Planning & Public Protection service (where the underspend originated).	CSP Manager	April 2015
		The CSP Manager is waiting for a response from the Home Office to confirm what it would like us to do with the remaining Crime and Anti-Social Behaviour (CRASB) funding.	CSP Manager	April 2015
		The CSP partnership agreement will further clarify financial decision-making responsibilities of the groups and governance of fund-holding. We will also develop a document to cover the financial responsibilities of other parties.	CSP Manager	November 2015

Background & Context

Community Safety Partnerships (CSPs) were created in 1998 as part of the Crime & Disorder Act, to develop and implement strategies and actions plans to help reduce crime and disorder. About four years ago, Conwy County Borough Council (CCBC) and Denbighshire County Council (DCC) merged their CSP teams, with CCBC being the host employer (within Regulatory Services). The Business Improvement and Modernisation service has recently taken the lead for managing the CSP within DCC, which was previously under the remit of the Planning & Public Protection service.

The CSP priority areas are to:

- reduce crime and impact on the community;
- reduce re-offending;
- effectively tackle anti-social behaviour and behaviour adversely affecting the environment;
- reduce harm caused by alcohol and substance abuse; and
- effectively tackle domestic abuse.

Review Outcomes & Risks Arising

Reporting

Opinion	There are processes in place to ensure that key stakeholders are kept engaged in the CSP. Due to the number of the groups in the structure, many meetings take place and this could lead to duplication in the information that is being provided. Having a review of the CSP structure and level of information that is being reported will be beneficial to ensure that roles and responsibilities are clear and there are no inefficiencies in the structure.
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The CSP structure (see Appendix 1) includes the Sub-Regional CSP Board (also known as the Strategic Group), Sub-Regional Implementation Group and is supported by various sub groups, such as Neighbourhood Watch. At a regional level, there is the North Wales Safer Communities Board, which oversees the strategic and commissioning duties of the local community safety partnerships and youth offending management boards.

All sub-groups and the Implementation Group meet quarterly, but the Strategic Group meets bi-annually. There is an appetite for the Strategic Group to meet more frequently, but currently this has not been possible due to the members being unavailable. Putting in place a rolling programme of meetings should hopefully address this.

There is a significant amount of reporting undertaken throughout the structure, with the CSP Manager attending all meetings of the sub-groups, Implementation Group and Strategic Group. She is responsible for co-ordinating meetings, preparing reports for each meeting, and monitoring that any emerging actions are completed. She is very committed to her role but the support work is both demanding and time consuming.

The reporting process can be dynamic where the partnership has to take urgent action, e.g. where there has been an increase in burglaries, a task and finish group is convened to develop an action plan for raising awareness in the community, along with putting in place measures to reduce crime.

While communication flows up through the structure, the reporting process could be more efficient. There is a significant amount of supporting documentation provided to each of these meetings, which takes time to prepare, whereas the person attending the meeting may not have the time to read the reports or digest the information beforehand, leaving us to question whether any of it is superfluous. Reviewing the level of information that group members receive and how it is presented will be beneficial to ensure that staffing resources are being used efficiently. (*See Risk/Issue 1*)

There also needs to be clarity of roles and responsibilities within the structure to ensure that there is no duplication or inefficiency. From reviewing the minutes of both the Strategic Group and Implementation Group, we established, for example, that both were provided with updates on performance and on finance. Terms of

reference for the Strategic Group include conducting an annual assessment of Crime and Disorder, developing a strategy for effectively tackling identified priorities, and ensuring effectiveness and value for money. From the sample of minutes reviewed, we found no evidence that they are fulfilling these responsibilities or approving business plans for various grants. (See *Risk/Issue 2*)

The lack of evidence may be down to the quality of the minutes. Although they are detailed, there is no evidence that the Strategic Group is acting as a 'critical friend' in challenging appropriately as required. Meeting minutes detail key actions but there are no timescales recorded to ensure that action owners implement their actions promptly, and so that other group members know when to expect completion. The CSP Manager explained that she has no dedicated administrative support currently, but is exploring options to rectify this with the Business Improvement and Modernisation service.

Governance

Opinion

Governance arrangements have been documented, and controls put in place to ensure that the sharing of confidential information is secure. However, we found some weaker areas where the process needs to be supported by a more robust framework to ensure that roles and responsibilities are clear and decisions are made at an appropriate level.

While governance arrangements have been documented, the process is not robust as:

- the CSP does not have a partnership agreement (before our review concluded, the CSP Manager had already started to develop this document);
- terms of reference are in place for several groups but they have not been recently reviewed, and may not accurately reflect the current arrangements;
- there is no scheme of delegation or decision making protocol to ensure that decisions are made at an appropriate level;
- there is no documented process for dealing with conflicts of interest within the partnership;
- there is no documented escalation process for dealing with poor performance to ensure that it is effectively managed; and
- nothing is documented to ensure that the CSP complies with the Welsh Language Scheme. (See Risk/Issue 3)

However, there are documented arrangements for ensuring that the CSP keeps confidential information secure and complies with the Data Protection Act 1998, as it follows the *North Wales Community Safety Chief Officer Strategic Group Protocol and Procedure for the Exchange of Information*.

Additionally, the CSP has a Communication Plan 2013-15 so that effective channels of communication can be developed and maintained with partners and the community. The CSP Manager has responsibility for monitoring that all actions detailed within this document are carried out.

Since 1 October 2009, scrutiny committees in Wales have powers to scrutinise CSPs, and the CSP Manager submits an annual report to both councils' Partnership Scrutiny Committees. It would be beneficial to review the Welsh Local Government Association's guide, *Scrutiny of Multi-Agency Partnerships* to ensure that this democratic engagement continues to add value in the scrutiny of partnerships and does not duplicate with the scrutiny carried out by other organisations, e.g. the Office of the Police and Crime Commissioner.

Risk Management

Opinion

There are mechanisms in place to ensure that the CSP's risks are regularly reviewed; however, the impact of risks needs to be considered as part of key decision making, and DCC needs to ensure that there is a process in place to capture partnership risks that may impact the Council, and similarly in CCBC if this is not already in place.

There is a risk register in place for the CSP, which is reviewed twice a year in line with CCBC's risk management process. The CSP Manager explained that the Strategic Group is involved with this activity but, from our review of a sample of minutes, there was no evidence to support this.

Reporting within the structure does not currently include the potential risks of key partnership decisions. The CSP Manager plans to adopt DCC's highlight report template so that the impact of risks can be considered as part of her progress reports. (*See Risk/Issue 4*)

Within DCC, a corporate partnership risk register was maintained but the process is currently under review to establish the best way for capturing partnership risks that may impact the Council. This may also be relevant to CCBC, if arrangements are not already in place. (*See Risk/Issue 4*)

The CSP Manager is confident that she is kept aware of legislative changes and other developments that could affect the work of the partnership through updates from both the Home Office and the Welsh Government to the networks that she has built up over the past eleven years.

Financial Management

Opinion

Our review of the Domestic Abuse Services Grant highlighted that the grant has not been effectively managed. There is also another grant where little action appears to have been taken to deal with an identified underspend. The reporting of grants also needs to be improved to ensure that stakeholders are clear of the financial position before key decisions are made.

There are various grant funding streams for the CSP:

- Substance Misuse Action Fund (SMAT)
- Crime Reduction and Anti-Social Behaviour (CRASB) – also known as the Police and Crime Commissioners (PCC) Fund
- Safer Communities/Youth Prevention
- Domestic Abuse Services Grant (DASG) – with additional funding for Independent Domestic Violence Advisers
- DCC also pays a contribution of £22,000 towards the CSP Manager’s post, and £9,700 towards an analyst within North Wales Police

Prior to 2014/15, DCC was responsible for administering the grants, but is now only responsible for the DASG, and this is where our review primarily focused.

Welsh Government’s terms and conditions of the grant state that there must be, “*clear accounting records identifying all income and expenditure*” (p.7), and that the grant could be subject to an audit by the Welsh Government (WG), Wales Audit Office, or the European Commission at any time.

The grant has not yet been audited, but currently there is an underspend on the DASG of £11,306.43. While this has been accumulated over several years, the majority (£9,565) was accrued in 2013/14. It had originally been retained to be used for redundancy costs, but DCC advised that this was not needed. Instead, retrospective approval had to be obtained from the Welsh Government to use the underspend for overhead and management costs (as the terms and conditions for the grant did not specify that funds could be used for this purpose). (See Risk/Issue 5)

Similarly, the Senior Finance & Assurance Officer advised us that there is an underspend within the CRASB grant of £8,403.65, which has accumulated since 2012/13. Little action appears to have been taken to deal with the underspend, and the Home Office department that provided the funding is no longer in place to enable approval to be gained to retain the underspend. The CSP Manager is currently waiting for advice from the Office of the Police and Crime Commissioner. (See Risk/Issue 5)

Work has been carried out within DCC to strengthen arrangements within the financial section for managing grants. The Senior Finance & Assurance Officer has recently taken over oversight of the DASG, and has put in place measures to ensure that sufficient action is now undertaken to deal with the

underspends, and that the financial information contained within the DASG grant claims are robust and accurate.

Reporting of the grants needs to be more transparent, as it leaves the CSP Manager vulnerable to challenge. Examples exist where there has been a lack of reporting on the Domestic Abuse Grant or its underspend, as it was not included in the Annual Report submitted to the Partnership Scrutiny Committee in September 2014 nor detailed in the sample of minutes reviewed for the Strategic Group. Additionally, in the Strategic Group minutes for February 2014, it was reported that a *“full spend is anticipated for the PCC fund”* (p.5) for 2013/14, with no evidence of an underspend being reported. (See Risk/Issue 5)

The Strategic Group minutes for 12 February 2014 state that, although a finance update was being provided at that meeting, *“it was agreed that any matters arising to do with finance were dealt with at the Implementation Group Meeting”* (p.2). While this decision may have been made to prevent duplication of discussion, it is important for the Strategic Group to continue to be involved in financial decision making to ensure that agreed arrangements represent value for money, as outlined in their terms of reference. (See Risk/Issue 2)

Most of the grants are now administered through CCBC, but there needs to be improvement in the reporting of the grants to ensure that both councils are clear of the outcomes of the grant and how the CSP represents value for money to each partner.

Due to the lack of robustness of governance arrangements, there are no documented financial procedures to ensure that roles and responsibilities for the partnership are clear in respect of day-to-day activities and what periodic reporting is required. (See Risk/Issue 5)

The CSP Manager has regular communication with the accountant for CSP in CCBC, who also attends Regulatory Service’s management meetings. Similarly, there is contact between the CSP Manager and the Senior Finance & Assurance Officer within DCC on the Domestic Abuse Grant. The finance sections at both councils are involved in authorising grant application forms and reviewing grant claims before they are submitted.

Report Recipients

- Community Safety Manager (Conwy and Denbighshire)
- Partnerships & Communities Team Manager
- Senior Finance & Assurance Officer
- Head of Business Improvement & Modernisation
- Corporate Director: Customers
- Head of Finance & Assets
- Leader of the Council
- Chair – Performance Scrutiny Committee
- Lead Member for Business, Improvement and Modernisation
- Lead Member for Community Safety
- Lead Member for Finance & Assets
- Corporate Governance Committee
- Head of Internal Audit (CCBC)

Key Dates

Review commenced	October 2014
Review completed	November 2014
Reported to Corporate Governance Committee	25 March 2015
Proposed date for 1st follow up review	July 2015

Appendix 1 - COMMUNITY SAFETY STRUCTURE

