

REDACTED



FINAL INTERNAL AUDIT REPORT

COMMUNITY SAFETY

PLA/01/2023

NOVEMBER 2023

Auditor	Principal Auditor
Reviewer	Head of Audit & Assurance

Distribution list

Job title
Assistant Director, Public Protection
Director of Environment & Public Protection
Head of Safer Communities

Executive Summary

Audit Objective	The overall objective of the audit was to review the adequacy and effectiveness of the Council's arrangements to discharge its duties under the Crime & Disorder Act 1998. This is achieved through the Safer Bromley Partnership and through working together on the priorities contained within the Safer Bromley Partnership Community Safety Strategy 2020-23. The approach of this audit was as a critical friend.
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Assurance Level		Findings by Priority Rating		
Reasonable Assurance	There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.	Priority 1	Priority 2	Priority 3
		0	5	1

Key Findings
<p>This audit was undertaken during a period of change. Some of the team were relatively new in post and there were vacant posts. The service is undergoing a number of improvements that have been put in place whilst the audit has been undertaken.</p> <p>We identified areas of good practice and sound controls as set out below:</p> <ol style="list-style-type: none"> Partners of the Safer Bromley Partnership Board were supportive of the Chair and her team. Partners recognised the collaborative way of working, which was valued. The team has put in place plans for the new Community Safety Strategy for 2024-27 and are consulting on the proposed priority areas. This has been highlighted during a workshop for all Safer Bromley Partnership Board (SBPB) partners, Councillors and officers. Partners and officers highlighted the good levels of communication inside and outside the Board and also that actions of the Board were usually delivered by the next meeting. <p>We have identified the following areas for management attention:</p> <ol style="list-style-type: none"> Safer Bromley Partnership Board (Priority 2) – The Constitution and the Terms of Reference of the SBPB had not been reviewed recently and does not reflect current roles or structure, the status of published minutes and how the Board feeds into other meetings. See Recommendation 1

5. **Community Safety Strategy Awareness** (Priority 2) – Performance measures have not been in place to assess delivery of the four priorities detailed within the Community Safety Strategy 2020-23 and there are gaps in information available to residents on the Bromley website. **See Recommendation 2.**
6. **Procedures, documents & process maps** (Priority 2) – Procedures and other documents were found to be in need of reviewing and updating to reflect the current processes, structure and terminology. **See Recommendation 3.**
7. **Anti-Social Behaviour & Safer Communities Team** (Priority 2) – There is a risk that Anti-Social Behaviour (ASB), Noise and Nuisance complaints could be incorrectly classified on initial triage and there are insufficient controls to detect and rectify this at later stages. **See Recommendation 4.**
8. **Management Information System** (Priority 2) – There are data quality issues regarding the numbers of cases currently showing as ‘open’ on the case management system. **See Recommendation 5.**

Management has agreed actions for all findings raised in this report. **Please see Appendix A.**

*Definitions of our assurance opinions and priority ratings are in **Appendix B.***

*The scope of our audit is set out in **Appendix C.***

Appendix A - Management Action Plan

1. Safer Bromley Partnership Board

Finding

The Safer Bromley Partnership Board (SBPB) was set up in line with the Crime and Disorder Act, 1998 to ensure that the public sector agencies, voluntary groups, and businesses work together with local communities to reduce crime and improve safety. The Crime & Disorder Act 1998 establishes partnerships between the local authority, police, probation, health, and fire services and these are the statutory partners. The SBPB currently meets quarterly.

This is in line with the 'Making Bromley Even Better' Ambition 4 'For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future'.

We reviewed relevant documents pertaining to the Safer Bromley Partnership Board namely, the Constitution and the Terms of Reference.

Constitution

The Constitution document was last reviewed in February 2008. The document needs to be revisited to ensure responsibilities and the relevant roles are clearly identified for statutory and non-statutory partner organisations, both strategically and operationally.

The membership of the SBPB needs to be reviewed at the same time, to ensure that members in attendance are senior postholders (and nominated deputies) to ensure that the statutory and non-statutory partner organisations are sufficiently represented.

Terms of Reference

The Terms of Reference was last reviewed in March 2017 and also includes the Terms of Engagement. This document makes reference to the Bromley Community Engagement Forum, which ceased to exist in 2015. Clarity could be provided to partners within the Terms of Reference regarding the expectations and responsibilities as a Board Member, including attendance.

SBPB Organisation and Management

We reviewed the minutes of the meetings. In our view, these minutes are informative and provide a high level of information, which is publicly available. We noted that the minutes are published as draft copies and not final copies.

It was unclear from reviewing the minutes, that there was a forward plan for the SBPB to enable the partnership to be as effective as possible, fully meeting its objectives and to ensure that the Board is proactive rather than reactive.

The SBPB has been receiving a verbal update on crime data and to make this more relevant and informative, the way in which the data is presented will be changed from December 2023. There will be a presentation slide which will show crime levels by ward and by street level which will provide greater clarity and engagement of the data for partners.

It should be noted that there is no data analyst post available to undertake analysis on behalf of the Board.

Meetings, undertaken throughout the audit, with partners and officers, to gather their feedback, highlighted that there should be clarity around how the SBPB feeds into other meetings. They also highlighted a need for clarity of the role of each partner organisation and what they bring to the SBPB.

Redacted – Individual Partner & Officer Feedback

Risk

Without the agreed direction and functions of the SBPB clearly defined, the Board may not be able to be effective in the delivery of the Board's priorities, to impact levels of crime and disorder.

A lack of planned focus on the desired outcomes, may lead to reputational risk to the Authority and may also lead to worse outcomes for vulnerable residents.

Recommendation

The Constitution and Terms of Reference of the SBPB should be reviewed and updated. This should also include notifying Board Members of their obligations and responsibilities as a Board Member of the SBPB, including attendance.

Rating

Priority 2

<p>The membership of the SBPB should also be reviewed, to ensure that there are sufficiently senior postholders in attendance (and nominated deputies), that the statutory and all non-statutory partner organisations are sufficiently identified and represented.</p> <p>A forward plan for the SBPB should be in place to enable the partnership to be as effective as possible and to ensure that the Board is proactive rather than reactive.</p>	
<p><u>Management Response and Accountable Manager</u></p> <p>The Co-Chair will ensure the Constitution and Terms of Reference of the SBPB are reviewed in Q4 of 23/24 and implemented in April 24 with the commencement of the new Strategy.</p> <p>The Head of Safer Communities will undertake a review of the SBP Members and circulate the updated Members list for discussion at the 29 February 2024 SBP meeting.</p> <p>A draft Forward Plan was presented at the December 2023 for consideration by partners, items were added for the next meeting in February and partners were encouraged to proactively suggest agenda items for the Forward Plan.</p>	<p><u>Agreed timescale</u></p> <p>30/04/24</p> <p>29/02/24</p> <p>6/12/23</p>

2. Community Safety Strategy

Finding

The broad strategic themes of the SBPB have been identified as priorities within the Community Safety Strategy 2020-2023 (current strategy).

This contains four priorities namely:

- Safer Neighbourhoods
- Violence against Women & Girls
- Keeping Young People Safe
- Stand together against hate crime and extremism.

Testing undertaken during the audit related to identifying how the progress and implementation against each priority is monitored and whether key performance indicators (KPIs) are utilised. We found that KPIs are not used as a performance measure, but instead regular narrative updates are provided to the SBPB meetings on progress made against each priority. Performance measures would have helped the service measure implementation of the four priority areas. However, this gap in performance measures has been acted upon and the updates against priorities provided against each of the four priority areas are now presented in a newly refreshed format with outcomes.

The Bromley Community Safety Strategic Assessment 2023 details the suggested priorities for inclusion for 2024-27.

The service has been proactive in organising and delivering workshops for partners, Councillors, and officers to attend, to gather feedback on proposals to further develop the service, most recently in November 2023. For those who were unable to attend, there is the opportunity to provide the feedback online.

The current Crime Prevention and Community Safety webpage on Bromley Council website does not detail the Community Safety Strategy for 2020-2023. The Strategy is difficult to locate unless searched for by name. The website for Community Safety does not provide relevant guidance and information for residents to access.

Redacted – Individual Partner & Officer Feedback

<p><u>Risk</u></p> <p>Residents are unable to have access to useful guidance on community safety issues, that could be readily available, without having to contact the Council.</p>	
<p><u>Recommendation</u></p> <p>The Crime Prevention and Community Safety webpage should be updated to provide residents useful information, such as how to deal with neighbour disputes, noise and nuisance and anti-social behaviour and contact information for the service. The Community Safety Strategy should also be available on this webpage along with information about the Safer Bromley Partnership Board.</p>	<p><u>Rating</u></p> <p style="text-align: center;">Priority 2</p>
<p><u>Management Response and Accountable Manager</u></p> <p>The Public Protection Service currently have additional officer resource. They have been tasked to review the Community Safety Webpages and look at the options for developing a Safer Bromley Partnership website which can be jointly managed by the partner agencies, however, the delivery of this will be subject to available resources to fund the webpage development and provide a sustainable resource to ensure it remains up to date.</p> <p>The Council's webpage will be updated by the end of July 2024, to ensure it is consistent with the new Community Safety Strategy 2024/27.</p>	<p><u>Agreed timescale</u></p> <p>31/07/24</p>

3. Procedures, Documents & Process Maps

Finding

We reviewed procedures as part of the testing. These included the Out of Hours Service Operating Manual and the Nuisance and ASB Team Processes and Procedures for Case Management dated 24/11/21 and last reviewed on 1/5/22.

ASB staff have not been able to access the Manual as this had been password protected until recently. Supplementary procedures are dated 2009, and there are process charts additionally.

We noted that staff have not been able to access the manual for some time now due to the password protection. A member of the Community Safety team also confirmed that they were unaware of any procedures being in place.

There has been a recent change in the out of hours service and this will need to be reflected within the procedures.

Complaints come in via Customer Services and the Out of Hours service, who allocate the case to an officer, inputting the data directly onto System A. This should be accompanied by an email to the allocated officer to alert them so that they are aware of the input and allocation of the case to them; however, this process for the email to be sent has not been included within the procedures. The Contracts and Project Manager advised on 1/11/23 by email that 'All service requests which come in via CSC either by phone or webform, trigger an automated email to the relevant teams mailbox'. There were instances highlighted during the audit where this had not happened, but we were advised on 13/11/23 by email that this issue has since been resolved. The Contracts and Project Manager advised that 'the new system, System B, will reduce the number of these points of failure, as we will be able to manage new cases directly in the system rather than relying on the use of mailboxes'.

The Contracts and Projects Manager advised by email on 1/11/23 that 'It is the responsibility of officers to review and correct any information on the System A case which includes reviewing the complaint code allocated to the case. We also have instances whereby the initial complaint may be for example a noise issue but on further investigation by the officer this subsequently changes to a complaint of anti-social behaviour. Again, it would be the responsibility of the case officer to change any coding on the System A case'.

(See Recommendation 4 which relates in part to a review all reported complaints to determine classifications are correct. This process will need to be added to the procedural documentation).

The Prevent Strategy is dated September 2020. The document needs to be updated to reflect the current structure and reviewed to confirm that the content remains relevant.

The Information Sharing Agreement for the purpose of the Channel project is to be reviewed annually. A copy of the 2023 Agreement has not yet been provided to us.

The Prevent Case Management Declaration requires updating to reflect the current structure.

The LB Bromley Prevent Duty Risk Assessment is dated 2023 but does not reflect the current structure. The risk assessment is incomplete for 'Council owned venues' and the impact of failure requires further clarity. The current risk score has not been added. There is no date for the annual review of the current risks. If the risk score changes the appropriate review should be scheduled, within the appropriate timescale.

Risk

Staff may not be sufficiently prepared to deal with the challenges in this service area, leading to incorrect decisions being made.

Recommendation

All documents, procedures and process maps should be fully updated to reflect the current processes, structure, and terminology.

Rating

Priority 2

Management Response and Accountable Manager

The Public Protection Service currently has an additional officer resource who has been tasked to review the current processes, including the Prevent Plan, Domestic Homicide Review Protocol, and the Information Sharing Protocol.

The review of the noise and nuisance offer has been completed and is now available on the Division's noise and nuisance webpages.

There is a review of the delivery of the ASB Service to determine the right structure for future delivery, all associated documentation will be updated and shared with officers as part of this process.

Agreed timescale

30/04/24

30/06/24

4. Anti-Social Behaviour & Safer Communities Team

Finding

The Terms of Reference for the Anti-Social Behaviour Forum refers to the ASB Panel within the title of the document.

Our discussions with relevant officers highlighted concerns that there was overlap of the ASB and noise cases and that staff that had not completed ASB training, may not be aware that cases fall under ASB and not Noise and vice versa. Staff taking the calls in customer services would also not be expected to know what would constitute a noise complaint or Anti-Social Behaviour per se. The Contracts and Projects Manager advised by email on 1/11/23 that 'It is the responsibility of officers to review and correct any information on the System A case which includes reviewing the complaint code allocated to the case. We also have instances whereby the initial complaint may be for example a noise issue but on further investigation by the officer this subsequently changes to a complaint of anti-social behaviour. Again, it would be the responsibility of the case officer to change any coding on the System A case'. (See Finding 3)

Staff across both teams have recognised that they would like to undertake training or refresh their training and competences.

Risk

There is the potential for duplication of work whilst officers investigate to determine the classification of cases and that cases may not be dealt with according to statutory requirements.

Staff may not have the necessary skills to be able to undertake the roles and responsibilities, and decisions may be made incorrectly.

Recommendation

The Terms of Reference for the ASB Panel/Forum should be updated.

A process put in place to review all reported complaints to ensure that the classification of cases have been correctly determined both currently and in the future.

Training should be undertaken to improve skills and competencies within the teams.

Rating

Priority 2

<u>Management Response and Accountable Manager</u>	<u>Agreed timescale</u>
<p>A review of ASB and nuisance services has started. This will determine the optimal structure for the future delivery of these services. This review will consider the role of a Panel or Forum and propose a new way of working to ensure appropriate involvement of internal and external partners in case management, for developing solutions to persistent issues, and to ensure that officers have appropriate information through different learning approaches, including training, mentoring, and learning reviews.</p>	<p>30/06/24</p>

5. Management Information Systems

Finding

The Contracts and Projects Manager confirmed by email on 21/11/23 that the total number of open records on System A was 334 which represents all teams. Of these 334 cases, 132 records relate to the Community Safety and Nuisance & ASB teams. There are data quality issues regarding the numbers of cases currently showing as 'open' on the System A.

Risk

Data Quality within the new system B will be impacted on transfer of such data.

Recommendation

Open records on System A should be investigated and those that are no longer live cases, formally closed off in advance of the system B go live date in 2024.

Rating

Priority 2

Management Response and Accountable Manager

A data cleansing exercise is underway and will be completed ready for the System B launch in September 2024.

Agreed timescale

30/09/24

6. Funding for Project

Finding

Concerns were raised by the Head of Safer Communities regarding an amount of funding that was provided by the previous Strategic Lead for circa £10,000 to Organisation A. At the time of testing, there had been no confirmation of the purpose of the funding, supporting documentation, and outcomes/ deliverables, as a result of the funding being provided.

Risk

Inability to substantiate how grant monies have been utilised, which may lead to funding restrictions or reductions.

Recommendation

Confirmation should be provided to confirm the details of the funding, how the funding has been utilised and the resultant deliverables. All supporting documentation should be readily available.

Rating

Priority 3

Management Response and Accountable Manager

The Head of Safer Communities has provided a matrix of the grant funding that has been made available and provided the reports to Organisation B. New arrangements will be outlined in the documents for the 24/25 financial years, and all new agreements and grant allocations will be stored on the relevant Systems C, to ensure they are readily available in future.

Agreed timescale

30/03/24

Appendix B - Assurance and Priority Ratings

Assurance Levels

Assurance Level	Definition
Substantial Assurance	There is a sound system of control in place to achieve the service or system objectives. Risks are being managed effectively and any issues identified are minor in nature.
Reasonable Assurance	There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.
Limited Assurance	There are significant control weaknesses which put the service or system objectives at risk. If unresolved these may result in error, abuse, loss or reputational damage and therefore require urgent management attention.
No Assurance	There are major weaknesses in the control environment. The service or system is exposed to the risk of significant error, abuse, loss or reputational damage. Immediate action must be taken by management to resolve the issues identified.

Action Priority Ratings

Risk rating	Definition
Priority 1	A high priority finding which indicates a fundamental weakness or failure in control which could lead to service or system objectives not being achieved. The Council is exposed to significant risk and management should address the recommendation urgently.
Priority 2	A medium priority finding which indicates a weakness in control that could lead to service or system objectives not being achieved. Timely management action is required to address the recommendation and mitigate the risk.
Priority 3	A low priority finding which has identified that the efficiency or effectiveness of the control environment could be improved. Management action is suggested to enhance existing controls.

Appendix C – Audit Scope

Audit Scope
<p>We reviewed the adequacy and effectiveness of controls over the following risks:</p> <ul style="list-style-type: none">○ Governance arrangements may not be effective, resulting in a lack of consistency of approach across the service and partner agencies, and a lack of joined up working○ Strategy awareness and communication activities are not effective, leading to awareness not being embedded. Priorities detailed within the strategy are not evaluated for implementation, leading to reputational risk to the Authority○ Poor service delivery and performance, the Community Safety team does not meet the expectations or the needs of residents○ Lessons learnt and the resultant changes to approach and policy are not taken forward. <p>We did not include Domestic Abuse (Violence Against Women and Girls) as this was covered in our 2022 audit of Domestic Abuse. This review also did not include CCTV, Noise & Nuisance specifically.</p> <p>We did not review instances of community safety at case level. Anti-Social Behaviour complaints relating to locations, the work of the ASB Panel and the Community Trigger processes will be reviewed.</p>