

Mae'r ddogfen hon ar gael yn Gymraeg yn ogystal â Saesneg.

This document is available in Welsh as well as English.



Police and Crime Commissioner's Office

COMPLIANCE REPORT 2025

01/04/2024 – 31/03/2025

Introduction

This paper has been compiled to give a brief overview of compliance within the Office for the Police and Crime Commissioner over the period from April 2024 – March 2025.

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1. Publishing Requirements

The OPCC is required to publish a draft of information at various intervals throughout the year in order to be transparent, provide information to residents and comply with legislation. All OPCCs must adhere to the requirements as set out in the Elected Local Policing Bodies (Specified Information) Order 2011. The Order ensures that PCCs will make available to the public information on:

- Who they are and what they do
- What they spend and how they spend it
- What their priorities are and how they are doing
- How they make decisions
- What policies and procedures govern the operation of the office of the PCC
- Lists & registers

There have been no external assessments of Police and Crime Commissioner websites since 2021 however, the Office remains cognisant of the Home Office's 2013 publications guidelines on publishing information where it is stated by the Home Office:

"The public need independent, consistent and clear information on the performance and activities of their PCC. Transparency is essential to promote confidence in the elected PCC. A consistent minimum amount of evidence will also allow the public to compare the performance of their PCC with PCCs elsewhere."

Following the development and rollout of a new website during 2024/2025 in depth checks continue to be undertaken to ensure that information is up to date and accessible for all. This will continue throughout the following years as business as usual, with the Head of Assurance undertaking regular dip sampling checks.

2. Welsh Language

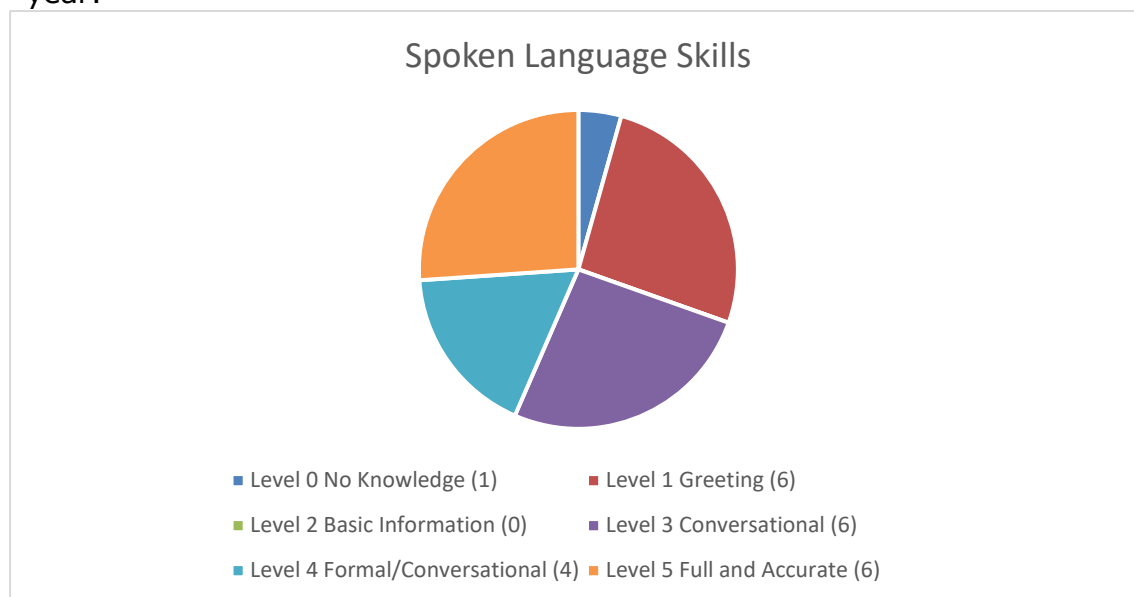
The Welsh Language Standards (No 5) Regulations 2016 came into force on 22nd March 2016. The main duties resulting from the standards require that the Welsh language should be treated no less favourably than the English language and should make it easier for people to use Welsh in their day-to-day life.

As of April 2019, the Welsh language entry requirement for all staff and officers is to be able to converse to level 1 standard. Current staff and officers who have no Welsh language ability will be supported to reach level 1 Welsh.

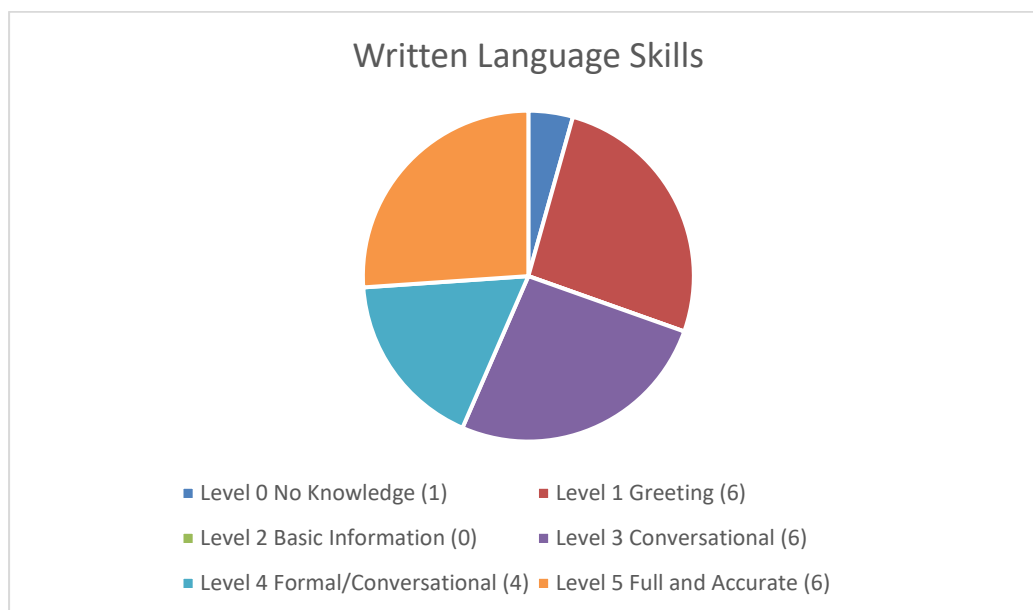
Welsh Language Skills

Level 0	No Knowledge
Level 1	Greeting
Level 2	Basic Information
Level 3	Conversational
Level 4	Formal/Conversational
Level 5	Full and Accurate

Number of OPCC staff who have Welsh language skills at the end of the financial year:



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During 2024/2025 the Office was not subject to any monitoring as part of the Welsh Language Commissioner's Office compliance monitoring regime having been assessed during 2023/2024. However, the OPCC continued to deliver expected service delivery standards.

No Welsh language breaches were recorded by the OPCC in this financial year and no complaints were received relating to the office's compliance with the Welsh language standards.

During 2024/2025 some staff took advantage of the online Welsh courses to improve their skills with three members undertaking level 1 courses. Following earlier attendance of level 1 courses two Members of staff enrolled and successfully completed the Welsh language skills course to Level 2. On a monthly basis an hour session called "Clwb Clecs" was re-introduced as a space for staff to practice their Welsh language skills with colleagues.

To further enhance the skills of our volunteers all were offered the opportunity to improve their Welsh language skills, in addition staff members from one of our Commissioned services attended level 1 Welsh language delivered by the Welsh Language tutor in the Force. 7 volunteers and 3 staff members from a commissioned service attended the level 1 training. Further discussions will be held during 2025/2026 on delivery of further training for volunteers where required.

A representative from the Office attends the quarterly Force "Yr Iaith a'r Waith" meetings which gives the office the opportunity to understand the current issues the Force is facing with regards to the Welsh language.

3. Information Management

Information Management is the process of collecting, storing, managing and maintaining information in all its forms. The OPCC must abide by the legal requirements set out in the Data Protection Act (2018) and the UK General Data Protection Regulations (UK GDPR)

During 2024/2025 there were two potential data breaches recorded. The first was in relation to the OPCC's internal auditors TIAA, who inadvertently sent an email intended for an internal colleague to a client. The content of the email was in relation to reports for the Joint Audit Committee, the majority of which are public documents. The individual informed their respective Data Protection Officer. This was deemed a low-risk data breach.

The second breach involved the OPCC, and an email sent to Sancus Solutions contained a document that included details of individuals not involved with a specific complaint case. Sancus Solutions are the organisation that considers OPCC complaint reviews and therefore all information is sent securely and to a nominated individual, therefore the risk was low. The individual informed the Data Protection Officer and Sancus were asked to delete the information.

In all circumstances the breaches were immediately recorded, and the appropriate actions taken. The OPCC DPO was informed. None of the above breaches were considered as reportable breaches under the UK GDPR.

4. Records Management

The OPCC is committed to operating in an open and transparent manner. To comply with the Freedom of Information Act the OPCC must ensure that its records meet the standards necessary to deal effectively with FOI requests.

The office is currently transitioning to a new file storage system (Microsoft 365 Teams). In order to prepare for the previous SharePoint system being disabled an exercise was conducted to review all of the files currently stored and migrate them over to the new system. As the previous system has been in use for several years this included reviewing thousands of documents to ascertain what needed to be migrated and what could be disposed of, in line with the OPCC R&D policy.

A working group was established to ensure that all departments within the office were involved in this process. It is envisaged that all documents, files and folders will have been reviewed and either migrated or disposed of by the end of the summer period in 2025.

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A member of the SMT and policy team have been identified to take overall control of this piece of work going forwards as the tasks for the working group draw to a close. The aim being that all hidden and private folders also get reviewed to ensure that everything is in place for the end of the year. Whilst a date for the previous system being disabled has not been confirmed the work undertaken in 2024 and into 2025 will ensure that the OPCC are in the best place possible for this.

A review of the OPCC R&D policy itself has been undertaken and from next year all departments should conduct an annual review of documents to ensure they meet the requirements of the policy.

A representative from the OPCC attends the Force's quarterly Information Assurance Board (IAB) which provides the opportunity to understand any current issues the Force are facing with regards to records management. IAB considers threats and opportunities in relation to the Information Management Business Area and reviews progress in relation to existing development plans and initiatives. During the year IAB closely monitored the implementation of recommendations made by the Information Commissioner's Office in relation to a significant backlog in responding to Freedom of Information (FOI) requests. The OPCC has also monitored the backlog through receipt of weekly statistics in relation to FOI's received.

The OPCC also raised concerns with the Force during the year in relation to delays in the progressing of Data Protection Impact Assessments (DPIA's), which are required for any project that processes personal data. Through discussions with the Force staff from the OPCC are now part of a working group that is reviewing the current processes and procedures around DPIA's with a view to making them more efficient. This area is also being monitored by IAB.

5. Freedom of Information

As a corporation sole, the OPCC are subject to and responsible for FOI requests. The FOI Act gives everyone the right to request any recorded information held by a public authority. The right only covers recorded information which includes information held on computers, in emails and in printed or handwritten documents as well as images, video and audio recordings. The OPCC must respond to all such requests within 20 working days.

47 FOI requests were received in the 2024-25 financial year, an increase of 7
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from the previous year.

Out of the 47 FOI requests received, 18 required a response from the OPCC., The remaining 29 requests were identified as requiring consideration of the Force, advice was provided on how to submit an FOI directly to Dyfed Powys Police. . The requests for which the OPCC held the information included:

- Commissioned Services
- Funding to external organisations/campaign groups
- Recognised Trade Unions
- Police Precepts
- Staff Settlement Agreements
- Riot Compensation Claims
- Firearms Licensing

The OPCC has visibility of the Force's FOI requests to understand the themes of requests being made. The subject matter of FOI requests submitted to the Force vary and can be influenced by topics of general interest in the press/media and of interest or concern to the public. The Force received 1233 FOI requests during 2024-25, an increase of 44 from the previous year. The Force has during the year made significant progress on responding to issues in relation to the timeliness of responses that occurred during 2022/23. The Joint Audit Committee and the OPCC continued to monitor the performance during the year.

6. Subject Access

The FOI Act also gives everyone the right to ask an organisation whether or not they are using or storing their personal information. A person can also ask for copies of their personal information, verbally or in writing.

This is called the right of access and is commonly known as making a subject access request or SAR. The OPCC are legislated to respond to any such requests within one month.

Subject Access requests are the sole responsibility of the OPCC to respond.

During this period 9 SAR's have been received however, the OPCC did not hold information on 8 of the subjects. They were all sent details informing them how to make their request to the Force if this is what they wished to do. The requests were all of a similar theme with people asking for details on cautions they had received, records of incidents etc.

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The OPCC did hold the information for 1 request. The information was in relation to personal data of the requestor and this was collated and sent to the individual within the legislative timescales.

7. Risk

The Business Manager maintains the OPCC Corporate Risk Register and reports on this to both the Senior Management team on a fortnightly basis and the Joint Audit Committee on a quarterly basis. If a risk arises, it is discussed as soon as it arises to establish the level of risk and the inclusion on the risk register.

Risks are managed in accordance with the Risk Management Framework and to ensure there is oversight of all risks, reports are produced when necessary to highlight any new areas of risk, those for discharge and those where the risk has escalated or decreased.

During 2024/2025 the OPCC continued to follow the format for the Force to ensure consistency. Where there are risks that are included on both registers regular discussions are held between the OPCC and Force to ensure the most up to date information is provided. Through the year there were 5 risks discharged from the Corporate Risk Register, and these were:

- Business Support – the risk was identified to the issue of recruiting to two posts within the OPCC. Following recruitment and a period of settling in this risk was removed
- Welsh Government withdrawal of PCSO Funding – this was a joint risk with the Force that the OPCC monitored. This was discharged in July 2024 as the issue was to be incorporated within the review of Neighbourhood Policing.
- Goleudy Victims Services – a long term risk for the OPCC due to the issues with resources and demand was able to be discharged following the successful appointment of a new victims service provider.
- New Victims Services – linked to the risk above a new victims service provider was appointed but there were issues in relation to the transfer of staff to the new provider. This was discharged during December.
- Ministry of Justice Funding – a significant risk raised during the year as there was a delay in announcements by the Ministry of Justice in relation to funding for 2025/2026. This was discharged in January 2025 following an announcement that funding would be provided.

In addition to the risks mentioned above a further risk was added to the register

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in October 2024 in relation to vetting and the risk to commissioned services staff being vetted in a timely manner. There have been improvements but the risk remains on the register to be monitored.

The Joint Audit Committee continue to monitor the area of risks to allow them to discharge their responsibilities.

When specific risks are identified, communications are sent to staff to advise them to be aware of the possible risk. Data protection and cyber security are two areas where risks can materialize on a regular basis.

8. Business Continuity

The OPCC Business Continuity Management (BCM) toolkit is in place to ensure staff know what to do should a situation arise where business disruptions occur, and normal working practices cannot take place. The toolkit outlines how the office would respond effectively to recover its activities and services.

The generic BCM toolkit has been subject to an in-depth review by the Force during 2024/2025 and this will now be implemented within the OPCC during 2025/2026. Support will be provided by the Governance and Service Improvement Unit Senior Manager to ensure the OPCC has a fully tested Business Continuity Plan.

9. Policing Protocol Order 2023 – Health check

Section 70 of the Police Reform and Social Responsibility Act (PRSRA) 2011 requires the Secretary of State to issue a Policing Protocol, which applies to every Chief Constable and Police and Crime Commissioner.

This protocol sets out the roles and responsibilities of all involved in the quadripartite relationship, namely Police and Crime Commissioner, Chief Constable, Police and Crime Panel and Home Secretary.

In order to demonstrate compliance with the Policing Protocol Order 2023 the OPCC developed a health check in 2018 which covers all the areas in the protocol which the Police and Crime Commissioner has legal power and duty over.

The health check is now reviewed on an annual basis to ensure that it remains relevant and provides business leads the opportunity to reflect on previous entries and change reporting as required. Whilst the Office considers alternative
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ways of capturing this information version 5 continued to be used for 2024/2025.

All business areas within the OPCC contribute to the health check on a quarterly basis by entering management information and summaries of what work they have conducted in order to meet the required specifications.

A report is produced from these summaries which is presented to the Police and Crime Panel and published on the OPCC website on a quarterly basis.

10. OPCC Complaints

Complaints against staff within the OPCC are handled in accordance with the OPCC Complaints Policy.

Complaints against staff within the OPCC (other than the Chief Executive) or about the organisation are considered by the Chief Executive.

During this period 3 complaints were received against staff within the OPCC.

Complaint 1 – The complaint was in relation to a lack of response to an Internal Review Request following an outcome of an FOI. The complaint emanated from a misunderstanding of the request from the individual whether they wish to have an internal review of the FOI or a review of the issue where they had raised a complaint. There was learning for the OPCC in relation to the timeliness of responses in line with statutory requirements and to ensure the appropriate advice is given on OPCC processes.

Complaint 2 and 3 – The complaints were made following an outcome of an OPCC complaint review. Whilst there is no further right of appeal following the outcome of a review careful consideration is given to any complaints received if it concerns a conduct of a member of staff. No further action was taken towards the complaints raised and no learning was identified.

11. Training

All OPCC staff are given the opportunity to attend regular training to ensure they are equipped with the tools and skills to undertake their duties. The appraisal system (DAP) allows line managers to monitor staff training and discuss any requirements.

Requests for training during 2024/2025 were collated for the different business by the Senior Management Team and discussed periodically at the Senior Management Team meetings to ensure that the training was relevant and fit for purpose for the Office. This will continue during 2025/2026.

In addition to this all staff are required to undertake mandatory NCALT (National OPCC Annual Compliance Report
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Centre for Applied Learning Technologies) modules on a variety of topics to ensure they are informed of topics which affect them, e.g. H&S, Data Protection, Lone Working. During 2024/2025 a series of 7 modules of training were required to be completed in relation to the Code of Ethics. During the year there were revised modules of training required including Health and Safety in the workplace and Police Staff Induction. These modules were revised due to changes in areas such as legislation and working practices.

There are occasions when the Force will request a certain NCALT module be completed by all staff, the Business Manager communicates this to all staff and enters it onto the training matrix. Requests in the last financial year have included Race-related Cultural Awareness training.

There is generally high compliance levels with regards completion of the specific training. The Chief Executive Officer reminds staff via the Senior Management Team of the requirement to complete training. As of the end of 2024/2025 the vast majority of the team had compliance levels over 75% with the remainder just a couple of points lower on 73% and 74%.

During 2024/2025 OPCC staff have attended several "Lunchtime Learning" sessions on key areas of interest. Sessions included information on Staff Support Networks, Language and Terminology training in relation to anti-racism, Community Safety networks and Benefits Management Framework. The Office has also received additional training at their Away Days on the area around Trauma Informed where the team looked at the work they currently undertake and identified areas of future work which, when implemented will demonstrate that they are a Trauma Informed organisation.

12. HMIC Responses

There have been 8 responses submitted to HMIC in the last year:

- A rapid review into the policing of public disorder
- A PEEL Spotlight Report: Policing Response to Anti-Social Behaviour
- Police response to stalking: Report on the super-complaint made by the Suzy Lamplugh Trust on behalf of National Stalking Consortium
- Overview report: Joint Inspection of Child Protection Arrangements 2019-2024
- An inspection report on progress to introduce a national operating model for rape and other serious sexual offences
- Vetting and anti-corruption part 2: How effective is the National Crime Agency at dealing with corruption.
- State of Policing: Annual Assessment of Policing in England and Wales Report for 2023

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- An inspection report into Activism and Impartiality in Policing