

Audit Findings & Management Action Plan

Finding 1

The council does not have a Community Safety Team Policy that covers the work undertaken by the Community Safety team and the powers available to them to tackle antisocial behaviour.

The council lacks an up-to-date Community Safety Team Policy to guide the responsibilities and actions of the community safety officers, and set out their role, their function, the mandatory training required and their powers. This absence may create ambiguity regarding the officers' authority and the application of available powers to address antisocial behaviour effectively within the Public Space Protection Order (PSPO) area.

The council has an Environmental Health and Community Safety Enforcement Policy that was produced in 2020. The council has been trialling the community safety team for 12 months and they have been working under this policy; however, this was created prior to the recent restructure and does not include the powers granted to the council under the Community Safety Accreditation Scheme (CSAS).

Action

Develop and implement a Community Safety Team Policy that clearly defines the mandatory training required, as well as the responsibilities, powers, and actions available to community safety officers, including those granted under CSAS accreditation.

Provide training to the community safety officers to ensure consistent understanding and application of the policy.

Priority	2	SWAP Reference	AP#7288
Responsible Officer	Control Centre Operations Manager		
Timescale	28 th November 2025		

Finding 2

Some of the subgroups do not clearly align with the priorities of the Community Safety Partnership, Safer Exeter.

The current subgroups operating under Safer Exeter, the Community Safety Partnership, lack clear alignment with its established priorities. This misalignment may result in inefficient resource allocation and reduced effectiveness in addressing key community safety objectives.

Action

Conduct a comprehensive review of the existing subgroups to evaluate their objectives and activities against the priorities of Safer Exeter.

Realign or restructure subgroups to ensure clear focus on priority areas.

Establish a regular review process to monitor alignment and effectiveness in achieving community safety objectives.

Priority	2	SWAP Reference	AP#7237
Responsible Officer	Head of Service – City Centre & Net Zero		
Timescale	30 th January 2026		



Finding 3

The council does not have a data sharing agreement with the other parties within the Safer Exeter Community Safety Partnership.

The council is participating in the Safer Exeter Community Safety Partnership without a formal data sharing agreement in place. This creates a risk of non-compliance with data protection regulations and inconsistencies in the handling, sharing, and safeguarding of sensitive information among the involved parties.

Action

Draft and implement a formal data sharing agreement outlining protocols for handling, sharing, and safeguarding sensitive information. Ensure all parties within the partnership review and agree to the terms.

This action will be undertaken as part a corporate initiative on managing data.

Priority	2	SWAP Reference	AP#7309
Responsible Officer	Head of Service - City Centre & Net Zero Head of Service, Digital and Data		
Timescale	28 th November 2025		

Finding 4

Not all of the terms of reference for the Safer Exeter Community Safety Partnership subgroups clearly set out their objectives and scope.

Not all of the Safer Exeter subgroups have clearly defined terms of reference outlining their objectives and scope. This creates ambiguity regarding their roles, responsibilities, and alignment with the priorities of the Community Safety Partnership, increasing the risk of inefficiencies and misaligned activities.

Action

Develop and implement standardised terms of reference for all subgroups, clearly defining their objectives, scope, roles, and responsibilities. Align these terms with the priorities of the Community Safety Partnership to ensure consistency and reduce inefficiencies.

Priority	3	SWAP Reference	AP#7284
Responsible Officer	Head of Service – City Centre & Net Zero		
Timescale	30 th January 2026		

Finding 5

The council does not have a privacy notice for activities undertaken by the community safety team.

The council lacks a documented privacy notice specific to the activities undertaken by the community safety team, potentially leading to noncompliance with data protection regulations and a lack of transparency in how personal data is collected, used, and stored for these activities.

Action

Develop and publish a privacy notice specific to the activities undertaken by the community safety team that outlines the collection, use, storage, and sharing of personal data.

Ensure the notice complies with data protection regulations and promote transparency by making it easily accessible to the public.

Regularly review and update the notice to address regulatory changes or operational updates.

This action will be undertaken as part a corporate initiative on managing data.

Priority	3	SWAP Reference	AP#7200
Responsible Officer	Control Centre Operations Manager Head of Service, Digital and Data		
Timescale	28 th November 2025		

Finding 6

The officers within the community safety team are failing to fully complete all fields of the daily occurrence book which records instances of antisocial behaviour, and which is used as an evidence base for the police. In addition, there are discrepancies with the format used for the dispersal order reference.

Officers within the community safety team are not consistently completing all fields in the daily occurrence book, which serves as a critical record of antisocial behaviour and an evidence source for police use. In addition, there are discrepancies with the format used for the dispersal reference. This inconsistency undermines the accuracy and reliability of the data, potentially impacting enforcement actions and community safety management.

Action

Remind the community safety officers of the importance of accurately completing all fields in the daily occurrence book, including the dispersal reference.

Implement periodic reviews to ensure compliance and address any recurring gaps.

Priority	3	SWAP Reference	AP#7247
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Responsible Officer	Control Centre Operations Manager
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Timescale	28 th November 2025
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Finding 7

Further improvements could be made to the format of the daily occurrence book used to record instances of antisocial behaviour, within the community safety team.

The current format of the daily occurrence book used to document antisocial behaviour lacks standardisation and consistency. This reduces the effectiveness of records for analysis, trend identification, and follow-up actions, potentially impacting the ability to address recurring issues.

Improvements could be made by adding additional columns to record the names and addresses of individuals where the community safety officers have exercised their CSAS powers. In addition, drop down menus could be established for some columns to assist with data consistency.

Action

Update the daily occurrence book to include standardised fields that capture key information, such as names, addresses, and actions taken under CSAS powers. Incorporate dropdown menus for specific columns to ensure data consistency and streamline record-keeping processes.

Inform staff of the updated format to promote the accurate and uniform input of records.

Priority	3	SWAP Reference	AP#7248
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Responsible Officer	Control Centre Operations Manager
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Timescale	28 th November 2025
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Finding 8

The community safety team does not have a data sharing agreement to share personal or sensitive data with the other internal services.

While not mandated by UK GDPR, the Information Commissioner's Office (ICO) recommends that UK local authorities have a data sharing agreement when sharing data internally between services. This agreement helps ensure clarity, consistency, and accountability in how data is handled.

The community safety team lacks a formal data-sharing agreement to govern the exchange of personal or sensitive information with other internal departments. This absence increases the risk of non-compliance with data protection regulations and potential misuse or unauthorised access to sensitive data.

Action

Draft and implement a formal data-sharing agreement in alignment with ICO recommendations to establish clear protocols for the exchange of personal or sensitive data. Provide training to staff on the agreement's provisions to ensure compliance and accountability. Conduct periodic reviews of data-sharing practices to identify and address any gaps or risks.

This action will be undertaken as part a corporate initiative on managing data.

Priority	3	SWAP Reference	AP#7308
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Responsible Officer	Control Centre Operations Manager Head of Service, Digital and Data
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Timescale	28 th November 2025
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Finding 9	Action			
<p><u>The council's retention and disposal policy does not include the role played by Safer Exeter, or the community safety team and the records held by this service.</u></p> <p>The council's retention and disposal policy does not address the responsibilities of Safer Exeter or the community safety team, nor does it account for the management of records maintained by this service. This omission creates the risk of non-compliance with record-keeping and data retention standards for these areas.</p>	<p>Undertake a review of the retention and disposal policy to explicitly include the roles and responsibilities of Safer Exeter and the community safety team. Ensure the policy addresses the management of records held by these services to align with data retention standards.</p> <p>Provide training to relevant personnel on the revised policy to ensure consistent application.</p> <p>The Head of Service - City Centre & Net Zero has contacted the policy team with the amendments that need to be made.</p> <p>This action will be undertaken as part a corporate initiative on managing data.</p>			
	Priority	3	SWAP Reference	AP#7313
	Responsible Officer		Head of Service - City Centre & Net Zero Head of Service, Digital and Data	
	Timescale		19 th December 2025	