

ORIGINATOR: CHIEF CONSTABLE

PAPER NO: AP14/71

**SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL
24 OCTOBER 2014**

**SUBJECT: CONSTABULARY RESPONSE TO HMIC CORE BUSINESS
INSPECTION RECOMMENDATIONS**

SUMMARY:

This report outlines Suffolk Constabulary's response to the recommendations outlined by HMIC in the "core business" national thematic report. In many cases, Suffolk Constabulary is confident that its current arrangements, systems and processes satisfy the criteria set out by HMIC. Where this is not the case, this report details the actions that the Constabulary will undertake.

RECOMMENDATION:

1. The PCC notes the progress outlined in the appendix.
2. The Constabulary provides an update on progress to the Accountability and Performance Panel in February 2015.

1. KEY ISSUES FOR CONSIDERATION:

Background

- 1.1 Her Majesty's Inspectorate of Constabulary (HMIC) inspected Suffolk Constabulary as part of its 'Making Best Use of Police Time' (MBUPT) programme in February 2014. This inspection, later rebranded as 'core business', focussed on three elements of policing; crime prevention, police response to incidents and crime, and freeing up police time.
- 1.2 The core business national thematic inspection report was published by HMIC on 4th September 2014. It was accompanied by two additional documents; firstly, individual letters from HMIC to Chief Constables detailing findings particular to each force and secondly, force-by-force data assessments which outlined how each police force had been assessed in relation to individual facets of the inspection. All documentation was published on the HMIC website and as such, available to the public.
- 1.3 Evidence collected in the core business inspection will contribute to grades and narrative in HMIC's police efficiency, effectiveness and legitimacy (PEEL) assessment of the Constabulary.
- 1.4 The national thematic report outlined 40 recommendations under the three strands of the inspection. The majority of recommendations applied to all police forces in England and Wales.
- 1.5 The individual force letter from HMI Zoe Billingham to Chief Constable Douglas Paxton, outlined sixteen key findings specific to Suffolk Constabulary. Four of these findings implied required areas for improvement which have been interpreted in this document as follows. The letter does not explicitly state these areas as recommendations, but where they can be directly linked to recommendations in the national report these are indicated in brackets:
 - The force should create a crime prevention strategy to coordinate activity (recommendation 2)
 - The force should provide staff who regularly deal with victims with crime prevention training (recommendation 8)
 - Control room staff should have information made available to them to enable them to understand what staff are deployable at any point in time (recommendation 13)
 - The force has limited use of mobile technology on patrol (recommendation 37)
- 1.6 HMI Billingham's letter also identified several points of good practice found in the Suffolk inspection including:
 - Good examples of long-term problem solving and daily focus on crime prevention
 - A regularly updated database of crime prevention initiatives
 - Clear policies and procedures to enable staff to consistently identify vulnerable and repeat victims
 - Clear evidence of officers recording updates of investigation progress and effective supervision of investigations.
 - A well-managed Integrated Offender Management scheme
 - A relatively good understanding of demand
 - Clear structure to assist supervisors assess the workload and performance of staff

- 1.7 The purpose of this report is to outline the Constabulary's response to these recommendations and points. In most cases the points raised by HMI Billingham and those emanating from the data assessments are covered by the formal recommendations from the national report. Therefore, this report is structured in line with the sections of the national inspection report and in particular those recommendations which apply to all forces nationally or specifically to Suffolk.
- 1.8 There is one notable inconsistency between the published data assessment and HMI Billingham's letter. The former states that the force is unable to identify repeat victims while the latter states explicitly "*The force has clear policies and procedures to enable staff to consistently identify vulnerable and repeat victims of crime and anti-social behaviour*". It is thought that this inconsistency is derived from the data return the Constabulary provided to HMIC in preparation for the inspection. This coincided with the changeover from the Constabulary's previous Command & Control system (Polaris) to its new system, STORM. The break in continuity of systems meant Suffolk was unable to match names between systems and therefore unable to provide HMIC with the details of repeat victims at the time of their request. Were the inspection run again, this would not be the case.
- 1.9 The Constabulary's responses to the national report recommendations are set out in the appendix.

Recommendations

- 1 The PCC notes the progress outlined in the appendix.
- 2 The Constabulary provides an update on progress to the Accountability and Performance Panel in February 2015.

2. FINANCIAL IMPLICATIONS:

2.1 There are no financial implications attached to the contents of this paper.

3. OTHER IMPLICATIONS AND RISKS:

3.1 Failure to complete actions outlined in this report could result in a negative assessment by HMIC in future inspections.

ORIGINATOR CHECKLIST (MUST BE COMPLETED)	PLEASE STATE 'YES' OR 'NO'
Has legal advice been sought on this submission?	NO
Has the PCC's Chief Finance Officer been consulted?	NO
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	YES
Have human resource implications been considered?	YES
Is the recommendation consistent with the objectives in the Police and Crime Plan?	YES
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	NO
Has communications advice been sought on areas of likely media interest and how they might be managed?	NO
Have all relevant ethical factors been taken into consideration in developing this submission?	YES

4. Appendix – full list of Recommendations in HMIC “Core business” report and Constabulary responses

Recommendation		Response
Recommendation 1	Not later than 31 March 2015, the police service, through the national policing lead for crime prevention, should establish and implement a national preventive policing strategy and framework. <i>[paragraph 3.8]</i>	National service recommendation.
Recommendation 2	Not later than 31 March 2015, all forces’ planning documents should contain clear and specific provisions about the measures forces will take in relation to crime prevention, in accordance with the published national preventive policing strategy and framework and in discharge of chief constables’ duties under section 8 of the Police Reform and Social Responsibility Act 2011 to have regard to the police and crime plans of their police and crime commissioners. <i>[paragraph 3.16]</i>	The Constabulary has devised its own strategy for crime prevention. The strategy is currently in the consultation stage and likely to be implemented in the autumn of 2014. The Constabulary will continue to liaise with the College of Policing over their work on the national strategy for crime prevention and integrate elements as appropriate. At the time of writing the College of Policing has not identified a timetable for publication of the national strategy.
Recommendation 3	By 31 March 2015, every force that does not have an adequate, force-wide problem-solving database should develop and start making use of one, to record, monitor and manage its neighbourhood problem-solving cases. <i>[paragraph 3.41]</i>	Not applicable to Suffolk Constabulary.
Recommendation 4	By 31 March 2015, all forces should ensure they are using their databases to track the progress and evaluate the success of actions taken in relation to each neighbourhood problem-solving case recorded on the database. <i>[paragraph 3.41]</i>	The Constabulary is confident that its use of the Empowering Communities Inclusion and Neighbourhood Management System (E-CINS) satisfies the criteria of this recommendation. Problem solving initiatives are subject to full evaluations by the Joint Performance and Analysis Department (JPAD) when requested.
Recommendation 5	By 31 March 2015, each force should ensure that it is able to disseminate information and share good practice from its database throughout the force, as well as to local authorities and other relevant organisations involved in community-based preventive policing or crime prevention. <i>[paragraph 3.41]</i>	The Constabulary is confident that the use of E-CINS in partnership with other local agencies enables the sharing of good practice. Partners who subscribe to E-CINS are able to access information on all problem solving cases.

Recommendation 6	By 20 October 2014, the one force which has not already done so should adopt a sound force-level definition of a repeat victim of anti-social behaviour. <i>[paragraph 3.44]</i>	Not applicable to Suffolk Constabulary.
Recommendation 7	By 31 March 2015, all forces should ensure that their records clearly establish whether victims of crime and anti-social behaviour fall within the applicable definition of 'repeat victim', and that appropriate steps are taken to ensure that when repeat victims call the police, the force's call-handlers have the means to establish immediately that the caller is a repeat victim. <i>[paragraph 3.44]</i>	The Constabulary is confident that its current definitions are sufficient to satisfy the criteria of this recommendation.
Recommendation 8	Not later than 1 September 2015, all forces should provide and periodically refresh basic crime prevention training for officers and staff who come into contact with the public. <i>[paragraph 3.60]</i>	The Constabulary has outlined plans for additional training for front line staff regarding crime prevention. These plans will be considered by the Deputy Chief Constable in October 2014.
Recommendation 9	By 31 March 2015, all forces should ensure that crime prevention or disruption activity carried out is systematically recorded and subsequently evaluated to determine the effectiveness of tactics being employed. <i>[paragraph 3.68]</i>	The Constabulary is confident that its use of the Empowering Communities Inclusion and Neighbourhood Management System (E-CINS) satisfies the criteria of this recommendation. Problem solving initiatives are subject to full evaluations by the Joint Performance and Analysis Department (JPAD) when requested.
Recommendation 10	Not later than 31 March 2015, those forces using a threat, harm and risk policy, that have not yet done so, should provide call-handlers with specific, sound and comprehensible criteria against which they can assess threat, harm and risk. <i>[paragraph 4.43]</i>	Not applicable to Suffolk Constabulary.
Recommendation 11	Not later than 1 September 2015, all forces should work with the College of Policing to establish as mandatory professional standards, service-wide definitions of vulnerable persons and repeat victims. <i>[paragraph 4.49]</i>	The Constabulary awaits the College of Policing's updated version of the Authorised Professional Practice (APP) guidance on Public Protection. This document will contain national definitions of vulnerable and repeat victims. There is currently no publication date for the document, but it is understood that it is currently in the quality assurance phase.

<p>Recommendation 12</p>	<p>Not later than 31 March 2015, all forces should ensure that call-handlers are following the correct procedures to identify callers as vulnerable or repeat victims. <i>[paragraph 4.49]</i></p>	<p>The Constabulary awaits the APP document outlined at recommendation 11, which will also include guidance on how to identify vulnerable victims. In the meantime the Constabulary is confident that its processes are sufficient to enable call handlers to identify vulnerable and repeat victims. These processes are focussed on use of the STORM command and control system. This system allows calls that come from addresses and people who have previously called, to be identified as 'repeat' at the point of call. It also enables operators to 'flag' cases assessed as high risk so that any future calls are immediately noted as high risk by subsequent call handlers. In addition to this the Constabulary uses specific "question sets" to help identify risk levels among victims. In future, the Constabulary plans to utilise the STORM vulnerabilities module – an add on to the existing system that will enable linkage to other databases, including Athena. This cross-referencing of information will further support call handlers to identify vulnerable and repeat victims at the point of initial contact.</p>
<p>Recommendation 13</p>	<p>Not later than 31 March 2015, all forces should have in place adequate systems and processes to enable the accurate recording and monitoring of the deployment and attendance of officers and staff in response to all crime and incidents reported to them. <i>[paragraph 4.65]</i></p>	<p>The Constabulary is confident that its current systems and processes meet the criteria of the recommendation. While this position contradicts the findings of HMIC (see HMI Billingham's letter), the following context should be noted. The STORM system, which records deployment and attendance, was turned on in Suffolk in November 2013. At the time of the core business inspection in February 2014, officers and staff were still becoming familiar with new functions and routines. Six months on, the Constabulary feels it is in a stronger position. Since the inspection, guidance has been issued to officers with regard to routines and there are plans in place to link STORM to the Enterprise Resource Program (ERP) which will automate aspects of processes and ensure even higher quality information is available.</p>

Recommendation 14	Not later than 31 March 2015, all forces should ensure that they have the ability efficiently and promptly to differentiate in their records their attendance to specific crime types, such as between burglary dwellings and burglary of other buildings. <i>[paragraph 4.76]</i>	The Constabulary will adjust its data capture mechanisms to record attendance rates by crime type and make these available where required.
Recommendation 15	Not later than 31 March 2015, all forces should establish and operate adequate processes for checking whether attendance data are accurate, including dip-sampling records. <i>[paragraph 4.77]</i>	The Constabulary is confident that the process required by the STORM system means that its attendance data is accurate. It will however, conduct an annual dip sample of quality, in December of each year, starting in 2014 and take actions accordingly.
Recommendation 16	By 1 September 2015, all forces should work with the College of Policing to carry out research to understand the relationship between the proportion of crimes attended and the corresponding detection rates and levels of victim satisfaction. <i>[paragraph 4.78]</i>	The Constabulary will actively support the work undertaken by the College of Policing via JPAD.
Recommendation 17	By 31 December 2014, all forces should ensure that PCSOs are not being used to respond to incidents and crimes beyond their role profiles, in respect of which they have no powers, or for which they have not received appropriate levels of training. <i>[paragraph 4.87]</i>	The Constabulary is confident that it does not use Police Community Support Officers (PCSOs) beyond their role or training unless very exceptional circumstances occur. PCSOs are not responsible for investigating crimes in Suffolk. Though PCSOs may carry out actions in support of crime investigation, the responsibility for oversight sits with a Police Officer. Suffolk Constabulary is working with Norfolk Constabulary to 'harmonise' the powers of PCSOs across both counties.
Recommendation 18	By 31 December 2014, all forces should produce clear guidance for officers and staff on what kinds of crimes and incidents need to be dealt with immediately and are not appropriate for resolution by way of appointment. <i>[paragraph 4.89]</i>	The Constabulary is confident that call handlers' current procedures are effective in communicating which events are for mandatory attendance and which events are not suitable for appointment. The Constabulary has a clear grading policy which is supplemented by 'question sets' which call handlers utilise to assess the vulnerability of the caller. Handlers have the discretion to override a non-appointment position if required.

Recommendation 19	By 31 December 2014, all forces should ensure that where crimes or incidents are being dealt with by appointment, these are, to the greatest extent reasonably practicable, made for the convenience of the victim(s); and that appointments are never used in cases requiring immediate attendance. <i>[paragraph 4.89]</i>	The Constabulary is confident its processes satisfy the criteria set out by HMIC. Appointments made by call handlers are led by the availability of the victim, not the officer.
Recommendation 20	Not later than 30 September 2015, all forces should ensure their officers and staff involved in investigation of crime over the telephone in call-handling centres, crime management units and telephone investigation units have received appropriate investigative training. <i>[paragraph 4.97]</i>	The Constabulary is confident its current training provisions satisfy the criteria set out by HMIC. Desk based investigations in Suffolk are undertaken by the Investigation Management Unit (IMU). Staff and officers in the IMU receive investigative technique and system training upon taking up their roles. They are provided an experienced investigator as a tutor who works with them until they meet the required standard.
Recommendation 21	Not later than 31 March 2015, all forces should ensure that all crime reports have investigation plans that are being properly updated and supervised, whether these are for crimes that have been attended or those being resolved by desk-based investigation. <i>[paragraph 4.104]</i>	The Constabulary is confident its current supervision plans meet the criteria set out by HMIC. Every crime is subject to a mandatory investigation plan which is reviewed and approved by a supervisor. Supervisors also have to authorise investigations before they are closed. This is applied to all investigations regardless of whether an officer has attended or not.
Recommendation 22	By 31 March 2015, all forces should have in place and be operating adequate systems which ensure that all crime reports are appropriately investigated before being filed. <i>[paragraph 4.104]</i>	
Recommendation 23	By 31 December 2014, those forces with ineffective Integrated Offender Management arrangements should conduct reviews of their shortcomings to establish the improvements which should be made. In each case, not later than 1 April 2015 the force should have drawn up an adequate improvement plan and made substantial progress in its implementation. <i>[paragraph 4.118]</i>	Not applicable to Suffolk Constabulary.

Recommendation 24	By 31 October 2014, all forces should ensure that they have adequate systems in place to record (a) the number of open unsolved crimes being investigated in relation to which there is a named suspect; (b) the number of people within their areas who have failed to answer police bail; and (c) the numbers of suspects about whom details have been circulated on the PNC. <i>[paragraph 4.121]</i>	The Constabulary is confident that its current processes meet the criteria set out by HMIC. Lists of named suspects are derived from the Crime Information System (CIS). Crime suspects who have been marked as “wanted” on the Police National Computer (PNC) are eligible for one year initially. These are monitored by Custody Investigation Units in each Strategic Policing Command area. Custody Sergeants have responsibility for the management of bail in each Policing Command.
Recommendation 25	By 31 October 2014, all forces should ensure that effective monitoring procedures and systems are in place to enable police managers to track the progress being made with named suspects and ensure they are being pursued as quickly as possible. <i>[paragraph 4.132]</i>	The Constabulary is confident that its current monitoring procedures satisfy HMICs requirements. Crime Investigation Department (CID) supervisors and managers oversee investigations on a daily basis as well as tracking forensic-based suspect identifications.
Recommendation 26	All forces should work with the College of Policing to support its work to establish a full and sound understanding of the demand which the police service faces. Forces should understand what proportion of demand is generated internally and externally, and the amounts of time taken in the performance of different tasks. All forces should be in a position to respond to this work by 31 December 2015. <i>[paragraph 4.159]</i>	The Constabulary will work closely with the College of Policing in respect of its assessments of demand and workload. It has received and examined the hypotheses being tested by the College and will use the results of their work within its review of local policing.
Recommendation 27	All forces should progress work to gain a better understanding of the demands they face locally, and be prepared to provide this to the College of Policing to establish good practice in this respect. All forces should inform HMIC of their progress on this matter through their annual force management statements. <i>[paragraph 4.159]</i>	The Constabulary will undertake an extensive review of its demand as part of its review of local policing and where applicable will share this with HMIC and the College of Policing as required.
Recommendation 28	By 31 March 2015, all forces should ensure they have the means to assess and better understand the workloads of their staff, and that officers and staff understand what is expected of them and how they will be assessed. <i>[paragraph 4.170]</i>	The Constabulary is confident that its current processes satisfy the criteria set out by HMIC as a result of its work on supervisory standards in recent years. The Constabulary set expectations for all staff in its Vision, Mission, Philosophy and through Performance Development Review processes.

Recommendation 29	All forces should work with the College of Policing to continue with its work to establish a full and sound understanding of the nature and extent of the workload and activities of the police service. All forces should be in a position to respond to this work by 31 December 2015. <i>[paragraph 4.179]</i>	The Constabulary will work closely with the College of Policing in respect of its assessments of demand and workload. It has received and examined the hypotheses being tested by the College and will use the results of their work within its review of local policing.
Recommendation 30	By 31 March 2015, those forces that have not already done so should conduct a review of the tasks currently being carried out by their police officers to establish which activities do not require warranted police powers and could be carried out by police staff. <i>[paragraph 5.6]</i>	Not applicable to Suffolk Constabulary.
Recommendation 31	By 31 March 2015, those forces without a mental health triage programme should carry out analysis to assess whether adopting such a programme would be cost-effective and beneficial in their particular areas. Where the analysis indicates this would be positive, all forces should work with their local mental health trusts to introduce such a programme by 1 September 2015. <i>[paragraph 5.15]</i>	Not applicable to Suffolk Constabulary.
Recommendation 32	All forces should work with the College of Policing to progress its work into how mental health cases and ambulance provision can be better managed. All forces should be in a position to respond to this work by 31 December 2015. <i>[paragraph 5.20]</i>	The Constabulary will make the findings of its evaluation of the Mental Health triage pilot currently ongoing in Ipswich available to the College of Policing. The Constabulary is also providing peer review to support to the College in respect of its forthcoming publication on the use of accident and emergency data in policing contexts.
Recommendation 33	All forces should work with the College of Policing to progress the work it has taken over from the Reducing Bureaucracy Programme Board to establish opportunities where savings can be made. All forces should be in a position to respond to this work by 31 December 2015. <i>[paragraph 5.33]</i>	In response to recommendations 33 and 34 the Constabulary currently collects ideas from staff through senior officer engagement.
Recommendation 34	By 31 March 2015, every force should introduce a local bureaucracy reduction programme with a plan for quantifiable efficiency savings. <i>[paragraph 5.33]</i>	

Recommendation 35	By 31 March 2015, all forces should begin monitoring how much officer and staff time has been freed up by the policies they have put in place to reduce bureaucracy, and establish how the force has used the extra time. <i>[paragraph 5.33]</i>	The Constabulary recognises the importance of reducing unnecessary bureaucracy. However, as a regulated organisation, there is a need to record data to ensure the Constabulary is efficient and effective. Using data enables information to be effectively provided to reassure the public and enable the Constabulary to improve and develop. To remove record keeping that brings no value to the organisation, the Assistant Chief Constable and the Chief Superintendent from the County Policing Command lead the “reducing unnecessary bureaucracy taskforce; which allows front line officers to make recommendations to senior officers. If adopted, the changes are made force wide and widely published.
Recommendation 36	By 1 September 2015, all forces should conduct a review into their use of video and telephone conferencing and ensure that it is being used wherever appropriate. <i>[paragraph 5.87]</i>	The Constabulary is confident that the review it undertook in 2012 satisfies the HMIC’s requirements.
Recommendation 37	By 1 September 2015, all forces should have in place, and thereafter implement to the greatest extent reasonably practicable, a sufficient and costed plan to progress the development of mobile technology which prioritises the requirements of frontline officers and staff, and to achieve the objectives of the National Policing Vision 2016. <i>[paragraph 5.87]</i>	The Constabulary supports the objectives of the National Policing Vision 2016. It is confident that the work currently progressing regarding mobile data terminals and body worn video cameras will contribute to those objectives. The Constabulary has held trials of mobile data terminals in four locations to assess to what extent it enables officers to undertake previously office-based tasks in the field. To date, pilots have been extremely successful and have enabled crime reports, statements and a wide range of applications to be used remotely. A business case for wider roll out is being prepared for chief officers for November 2014.

Recommendation 38	By 31 March 2015, the police service should establish sound arrangements for its co-operation with the Association of Police and Crime Commissioners, the College of Policing and (to the extent necessary) the Home Office to establish a national police information strategy which facilitates the most efficient and economical steps to ensure the greatest practicable accessibility of information (including its transmission and receipt) by police officers and others in or concerned with the criminal justice system. <i>[paragraph 5.87]</i>	National service recommendation.
Recommendation 39	With immediate effect, all forces should ensure that all ICT systems which they acquire or upgrade should comply with the highest practicable standards of interoperability. <i>[paragraph 5.87]</i>	The Constabulary is confident that its current processes satisfy the criteria set out by HMIC.
Recommendation 40	With immediate effect, all forces should review their ICT design and procurement arrangements and ensure that every appropriate opportunity for efficiency and economy in ICT design and procurement which is provided by centrally-provided or centrally-co-ordinated agencies is taken. <i>[paragraph 5.95]</i>	

