
Police Accountability

Written Evidence

Section E - H

Evidence Number	Name	Stakeholder category
E29	Nigel Pearson, Chief Executive of East Riding Council	Local government
E30	Essex Police, Chief Constable	Police force
E31	Police and Crime Commissioner for Essex	Police and Crime Commissioner
E32	Essex Police and Crime Panel	Police and Crime Panel
E33	Professor Francesca Gains (University of Manchester) and Professor Vivien Lowndes (University of Nottingham)	Academics
E34	Police and Crime Commissioner for Gloucestershire	Police and Crime Commissioner
E35	Gloucestershire Police and Crime Panel	Police and Crime Panel
E36	Mr G Phillips	Member of the public
E37	Police and Crime Commissioner for Gwent	Police and Crime Commissioner
E38	Gwent Police and Crime Panel	Police and Crime Panel
E39	Police and Crime Commissioner for Hampshire	Police and Crime Commissioner
E40	Hampshire Police and Crime Panel	Police and Crime Panel
E41	Office of the Police and Crime Commissioner for Hertfordshire	Police and Crime Commissioner
E42	Hertfordshire Police and Crime Panel	Police and Crime Panel
E43	Police and Crime Commissioner for Humberside	Police and Crime Commissioner



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17 October 2014

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Dear Sirs

Response of East Riding of Yorkshire Council to Humberside Police Force Redesign Plan

I write in response to the Committee on Standards in Public Life call for submissions about the accountability to the public of Chief Constables under the elected Police and Crime Commissioner (PCC) system introduced in November 2012.

At Full Council on 8 October, Members agreed to send the Committee its overview and scrutiny panel report on the planned changes to the level of policing in the East Riding of Yorkshire due to be implemented within 6 months on 1 April 2015.

The main finding from the Council's scrutiny panel is that the Police & Crime Commissioner and the Chief Constable should have done more to engage and consult with statutory partners and the wider public on their radical plans for change within the Humberside Police Force.

It is the Council's view that it holds the Chief Constable and the Police and Crime Commissioner to account locally under its scrutiny powers provided in the Local Government Act 2000 and the Police and Justice Act 2006. The Police and Justice Act 2006 Part 3, 19(1) states that "every local authority shall ensure that it has a committee with power (a) to review or scrutinise decisions made, or other action taken, in connection with the discharge by the responsible authorities of their crime and disorder functions."

The Crime and Disorder Act 1998 Part 1 Chapter 1 Crime and Disorder Strategies defines 'responsible authorities' as:

- (a) The Council for the area, and
- (b) Every chief officer of police any part of whose police area lies within the area.



**INVESTORS
IN PEOPLE** | Gold

17 October 2014

In addition under the Local Government Act 2000 Chapter 2. Section 9F 2(e) overview and scrutiny committees have power to “make reports or recommendations to the authority or executive on matters which affect the authority’s area or the inhabitants of that area.”

However, the Chief Constable and the Police and Crime Commissioner declined to attend the Council’s scrutiny review panel and share the full details of Humberside Police’s plan for the redesign of policing developed in response to the financial constraints it faces in future years

The view taken by the office of the Police and Crime Commissioner was that the Chief Constable was held to account by the PCC and the PCC was held to account by the Police and Crime Panel.

The Council was, therefore, prevented from fully carrying out its responsibilities on behalf of the public of the East Riding of Yorkshire. Further, Humberside Police’s partners in tackling crime and disorder have also not had sufficient opportunity to fully share their views on the content of Humberside Police’s redesign plan and how it may impact demand on their services and the cost shunting this may bring.

The Police & Crime Commissioner and the Chief Constable offered instead to attend a meeting of the Full Council with all 67 Members present but it was felt that this would not provide the same opportunity for effective scrutiny in the way review panels are set up to do in a smaller cross party group and non-political setting. In addition, the Council’s scrutiny review panel met over several sessions and called for information from a wide range of partners and interested groups and was able to weigh-up the information available to reach its findings and conclusions.

It is clear that the legislation that introduced Police and Crime Commissioners and Police and Crime Panels has muddied the waters as regards scrutiny and the holding to account of both the Chief Constable and the Police and Crime Commissioner. The view taken by the office of the Police and Crime Commissioner at this level effectively excludes any local authority from scrutinising the decisions of either a Chief Constable or, more pertinently to your deliberations, a Police and Crime Commissioner. The Council’s scrutiny panel felt that this limited their ability to scrutinise the changes being planned to policing in Humberside and it is felt that the local authorities’ scrutiny powers to hold the Police & Crime Commissioner and the Chief Constable to account therefore requires clarification.

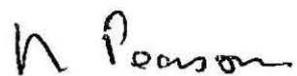
The Council considers that the Police & Crime Commissioner and the Chief Constable could have made much more effort to engage and consult with the Council and the public in the East Riding during the development phase of their plan in the interests of openness and accountability. The Council hopes that the Committee on Standards in Public Life finds the attached report of interest and helpful in its deliberations.

- 3 -

17 October 2014

Please let me know if you require any further information.

Yours faithfully

A handwritten signature in black ink that reads "N Pearson". The signature is written in a cursive style with a large, looped 'N' and a long, sweeping underline.

Nigel Pearson
Chief Executive

Copy to
Chief Constable, Humberside Police

Response of East Riding of Yorkshire Council to Humberside Police Force Redesign Plan

Report of the Overview and Scrutiny Review Panel

October 2014

Approval by full Council

At its meeting of 8 October 2014, East Riding of Yorkshire Council received this report, fully supported the findings of the Review Panel and approved all of the recommendations contained within this report.

CONTENTS

		Pages
1.	Chairman’s Foreword	1
2.	Executive Summary	2-4
3.	Review Panel Recommendations	5-6
4.	Members of the Review Panel	7
5.	Financial Implications	7
6.	Methodology	7-8
7.	Legislation and Guidance	8
8.	Introduction	9
9.	National Picture	10
10.	Local Picture	11-12
11.	Humberside Police Force Current Structure	13-14
12.	Crime Figures for the East Riding and Humberside	15-18
13.	‘Building the Future’ - Humberside Police Force Redesign	19
14.	The Panel’s Response to Humberside Police’s ‘Building the Future’ Proposals	20
14.1	Consultation	20-21
15.	Implementation Timeframe for ‘Building the Future’	22
16.	Reserves and Precept	23
17.	IT and Mobile Technology	24-25
18.	Reducing Demand & Customer Service	26
19.	Neighbourhood Policing	27-28
20.	Police Stations, Response Times and Estate Functions	29-31
21.	Policing Numbers	32-33
22.	Response from East Riding of Yorkshire Council Stakeholders	34-35
23.	Conclusion	36

Table of Abbreviations and Terms	37
Bibliography	38
Acknowledgements	39

Appendix 1	Methodology and Scope	40-41
Appendix 2	The Work of the Council in Reducing Anti-Social Behaviour, Crime and Disorder	42-45
Appendix 3	Questions for the Police and Crime Commissioner and His Staff	46
Appendix 4	Questions for the Chief Constable and Her Staff	47-48

1. CHAIRMAN'S FOREWORD

- 1.1 The East Riding of Yorkshire Council has a long history of supporting Humberside Police in helping them provide a vital service to reduce and prevent crime and doing much to create a sense of safety within our communities.
- 1.2 Alongside the police, working in partnership, East Riding of Yorkshire Council provides a range of services to deal with such issues as anti-social behaviour, domestic violence and youth offending. Much effective work is done through both organisations working together, and it is really important that this continues and develops further in the future in response to the financial challenges we both face.
- 1.3 I very much welcomed the opportunity to be Chairman of this review panel. The purpose of the review was to examine the operational restructuring of Humberside Police that is currently underway and to evaluate how changes in service structure and operation are likely to impact on residents in our area and the delivery of East Riding Council services.
- 1.4 The task of undertaking the review was not easy. The Panel faced the challenge of trying to assess the nature of the new police structure and service at a time when much of the detail had either not yet been developed or was only available in outline; a situation which was not helped by limited involvement in the review by the Office of the Police and Crime Commissioner and the Chief Constable. There was also time pressure; with the new service structure due to be operational from April 2015 we wanted to complete our report well in advance of that date in order to give it the opportunity to be fully considered. In order to evaluate the effectiveness of the new structure once it is fully in place within the East Riding, the Panel has reserved the option to re-convene during Autumn 2015.
- 1.5 During the course of the review Members of the Panel developed a number of recommendations, which we hope Humberside Police will consider positively in relation to general aspects of its redesign process and specific elements within it - they are all important and are listed numbers 2 to 12 on pages 5 and 6 of this report. The most important recommendation (our number 1 recommendation), however, relates to the issue of communication. We took the view that Humberside Police could have made much more effort to engage and consult with East Riding of Yorkshire Council during the development phase of its reform and with the general public it serves, and we call for increased co-operation from now on with regards to development and implementation of the new police structure and its impact within the East Riding area.
- 1.6 On behalf of the Panel I would like to express our appreciation of the hard work done by all members of Humberside Police Force, our understanding of the challenge the service faces during times of severe budget restraints and our thanks to the two officers of Humberside Police who gave us their time in telling the Panel about some of the changes in-hand during the course of this review.
- 1.7 I would like to offer my thanks to all Members of the Review Panel for their commitment and input into the task, to Gareth Naidoo for organisation of the review and producing this report and to Jane Stewart along with other Council Officers who gave their advice and support.



Councillor Shaun Horton
Chairman of the Review Panel

2. EXECUTIVE SUMMARY

- 2.1 The purpose of the Council's Review Panel is to gain an understanding of Humberside Police's redesign plans and any possible implications for East Riding residents, and act as a formal consultation process with the Office of the Police and Crime Commissioner and the Chief Constable.
- 2.2 The Council has a statutory responsibility under the Police and Justice Act 2006 with power to review or scrutinise decisions made, or activities taken, by responsible authorities (i.e. Humberside Police) in connection with their crime and disorder role.
- 2.3 At the time of finalising this report, no business case or written rationale for their proposed changes to policing was made available by the Office of the Police Crime Commissioner or Humberside Police for the Review Panel to consider. The Panel has therefore sought other evidence referenced in this report and relied on interviews with parties who agreed to take part, together with information gained from articles in the local press.
- 2.4 The request for a review into the Humberside Police Force restructure was made by the Overview Management Committee at its meeting of 23 January 2014. The Council's Review Panel was set-up to consider the local impact of policing changes in the East Riding only and the value-for-money from its residents' contribution to the police precept. It has a different role to the Government's Police and Crime Panel, which is Humber-wide in its representation.
- 2.5 Due to reducing budgets and the need to modernise the Force, Humberside Police is undergoing a period of huge transition. Its redesign plan 'Building the Future' will bring about an immense change to the way Humberside Police is structured (doing away with the traditional divisional structure across the Humberside Police area and replacing it with a series of area-wide 'Commands') and will instigate an operational shift to the way Humberside Police undertakes its operations. The redesign plan, due for implementation in April 2015, will include a significant reduction in police officers and police staff.
- 2.6 Information on Humberside Police's 'Building the Future' redesign plan has been limited, with the Chief Constable and Police and Crime Commissioner declining to fully engage with this review. This has made it difficult for the Panel to assess the full impact the new Humberside Police structure might have on the prevention, reduction and tackling of crime in the East Riding and Humberside area. The Panel, however, is grateful that the Divisional Commander for 'C' Division was able to present outline proposals, particularly on the changes in respect of the Communities Command, one of the four new Commands currently being planned.
- 2.7 Whilst it is anticipated that greater detail on Humberside Police's 'Building the Future' plan will emerge in the near future, the Panel felt it necessary to draw to a conclusion its review, to allow time for Humberside Police to take the Panel's concerns into consideration and, if deemed necessary, take corrective action before implementation of the Plan takes place.
- 2.8 The Panel recognises that due to the limited involvement from both the Office of the Police and Crime Commissioner and the Chief Constable, the Council's statutory review could only go so far in scrutinising the changes being planned to policing in Humberside. With this in mind, the Panel reserves the option to re-convene during Autumn 2015 to test the effectiveness of the new police structure and delivery in line with the Council's statutory function.

- 2.9 Taking into account the information presented to it, the Panel has taken a measured approach in making its recommendations to assist the Office of the Police and Crime Commissioner and the Chief Constable in making their planned changes to policing. The Panel hopes these changes to policing will not adversely affect the safety of local communities and residents of the East Riding.
- 2.10 The Panel in concluding its findings raised the following key issues:
1. The Panel has not had the level of co-operation it expected from the Chief Constable or Police and Crime Commissioner. Both the Office of the Police and Crime Commissioner and the Chief Constable declined the Panel's invitation to attend and respond to questions prepared by the Panel (see Appendix 3 and 4). The Panel leaves an open-ended invitation for both parties to attend and to present the draft plan for future policing to the Council and requests that time is allowed for meaningful consultation and revisions as required.
 2. The Office of the Police and Crime Commissioner and Humberside Police have not made arrangements to formally consult with all local communities in the East Riding affected by the radical changes in policing that are reported to be now "well-advanced". The Council is not alone in forming this view. Her Majesty's Inspectorate of Constabulary has raised the same issue about Humberside Police not consulting the public, this time over the Police's policy decision not to attend all reports of crime and incidents in the area.¹
 3. According to Her Majesty's Inspectorate of Constabulary, Humberside Police 'requires improvement' in financial planning for the short and long term. Humberside Police is rated towards the low end of a "good" judgement overall compared to other police forces and Her Majesty's Inspectorate of Constabulary has a concern about the security of the financial position of Humberside Police². The Panel is concerned that Humberside Police is rushing ahead to meet an implementation date of 1 April 2015 to meet financial targets and in doing so, is risking the success of the changes it plans to introduce.
 4. It is not clear how the additional revenue gained by raising the police precept by 1.99 percentage and the £32m held in reserves will be used by the Office of the Police and Crime Commissioner to achieve acceptable levels of policing in the East Riding.
 5. There was insufficient information provided by Humberside Police to give the Panel confidence that an IT and mobile solution could be implemented reliably and securely by March 2015 to increase the productivity of frontline police officers, particularly when visiting remote locations in the East Riding where Broadband and signal strength remains an issue.
 6. The Panel has serious concerns about the robustness of the data being used by Humberside Police to evidence its view that 44 percent of calls for a policing response are "waste and failure demand", meaning that residents, in their view, are inappropriately seeking help from the Police. The Panel would like to scrutinise Humberside Police's position and ensure the public receive services, and victims the support they require, without being passed from 'pillar to post' between police and Council services.
 7. The Panel was reassured by the Divisional Commander for 'C' Division that the East Riding would receive its fair share of neighbourhood policing, and its work on

¹ HMIC: *Core business: An Inspection of crime prevention, police attendance and use of police time* (letter dated 3 September 2014)

² HMIC: *Policing in Austerity: Meeting the Challenge July 2014*

preventing crime in the area would continue unchanged; however, the Panel wishes to see this put into practice.

8. According to Her Majesty's Inspectorate of Constabulary, there were 41 police stations in 2010 which were predicted to be reduced to 15 by March 2015, a closure of 26 police stations. Current figures put the number of police stations at 36 which means that five police stations have already been closed. Humberside Police plan to close a further 21 police stations on the north and south bank by March 2015³. There are currently 14 police stations in the East Riding and 9 in Hull (13 on the south bank), but no detail was provided to confirm where these closures would take place over the next seven months.
9. The Office of the Police and Crime Commissioner is just one of five other areas that has not set a benchmark target for response times to emergency incidents⁴. The Panel believes this is a crucial flaw and will prevent the measuring of success of the planned changes to policing. Her Majesty's Inspectorate of Constabulary is concerned response times nationally are increasing following the funding constraints and the Panel is firmly of the view that it would be sensible to monitor response time performance.
10. Her Majesty's Inspectorate of Constabulary report states that by March 2015, there will be 1,563 police officers (a reduction of 495 police officers since March 2010). This police officer reduction in Humberside is the highest in the country. The national average is 11 percent; the reduction in Humberside is percent. An additional 210 police officer posts are still to be reduced and it is not clear which areas of Humberside or which specific police services will be adversely affected by this planned reduction⁵.
11. The Panel has raised other concerns in this report and is aware of a further report from Her Majesty's Inspectorate of Constabulary in which it is advised that the integrity of Police crime data needs significant improvement. This raises a key issue in comparing crime levels year-on-year, leaving the Panel unable to ascertain whether the fall in crime in recent years is due to improved policing and co-operation from partners, or instead, due to the under-reporting of crime as found by the Inspectorate. HMIC reported that 27 percent of incidents reported by the public to Humberside Police, which the Inspectorate identified as crimes, had not been recorded by Humberside Police as a crime⁶.

³ HMIC: *Responding to austerity: Humberside Police July 2014* (Page 23)

⁴ HMIC: *Policing in Austerity: Meeting the Challenge July 2014* (Page 21)

⁵ HMIC: *Responding to austerity: Humberside Police July 2014* (Page 15)

⁶ HMIC: *Crime Data Integrity: Inspection of Humberside Police August 2014* (Page 6)

3. REVIEW PANEL RECOMMENDATIONS

No.	Primary Recommendation	
1.	Primary Recommendation (pages 21 & 36)	That Humberside Police fully engage with East Riding of Yorkshire Council on its redesign plans and any impact this may have on the work of the Council, so that the two organisations can work in partnership in an open and transparent nature for the benefit of East Riding residents.

No.	Area of Concern	Additional Recommendations
2.	Consultation (page 21)	That a timetabled programme of consultation be developed on Police service changes with all local communities in the East Riding, which includes details of how feedback will be used to shape Humberside Police's transformation plans.
3.	Implementation Timeframe for 'Building the Future' (page 22)	That the Humberside Police redesign process be implemented over a longer period of time in order to enable a phased approach to be taken in collaboration with all partners and local communities.
4.	IT and Mobile Technology (page 25)	That Humberside Police and the Council continue to work towards the identification and approval of further opportunities for joint working, particularly through the use of new technology and agile working arrangements where there is merit in doing so.
5.		That Humberside Police engage more fully with local public sector partners to exploit the potential that Public Service Networks provide.
6.	Reducing Demand & Customer Service (page 26)	That clear procedures are developed and agreed through a joint approach by all relevant partners to customer contact for related services so that communities are clear about who they should contact when in need of help and support.
7.	Neighbourhood Policing (page 28)	That Humberside Police set out how communities can regularly influence the design and delivery of neighbourhood policing to ensure that their specific needs are met and that this be achieved by consultation with ward councillors and town and parish councils.
8.		That the Office of Police and Crime Commissioner reconsider its decision to not provide match funding for Neighbourhood Watch schemes in the East Riding

No.	Area of Concern	Additional Recommendations
9.	Police Stations, Response Times and Estate Functions (page 31)	That clear information be provided to the public on the proposed number of police stations in the East Riding and expected response times following implementation of Humberside Police's "Building the Future" redesign plan.
10.		That consultation on the closure of any police stations in the East Riding be undertaken by Humberside Police with the relevant local community and town or parish council and all other partners. No area should be disadvantaged by any proposed police station closures.
11.		That Humberside Police, the Council and other partners consider how the estates function can be better joined up across the East Riding to make more cost effective use of resources such as shared back office and frontline information, advice and guidance.
12.	Policing Numbers (page 33)	That Humberside Police provide assurances that the East Riding will not be disproportionately affected by a reduction in policing numbers and resources, and that its local communities remain safe and protected in the future.

4. MEMBERS OF THE REVIEW PANEL

4.1 The membership of the Review Panel was set at six Members from East Riding of Yorkshire Council (four Conservatives, one Labour and one Independent).

4.2 Members of the Review Panel consisted of: Councillors Shaun Horton (Conservative) as Chairman, Chad Chadwick (Conservative), Paul Hogan (Labour), Phyllis Pollard (Conservative), Ann Suggit (Independent) and Felicity Temple (Conservative).

4.3 Queries regarding this review should be directed to:

Gareth Naidoo
Senior Committee Manager (Overview and Scrutiny)
East Riding of Yorkshire Council
Democratic Services
County Hall
Beverley
HU17 9BA
Tel. (01482) 393206
Email: gareth.naidoo@eastriding.gov.uk

5. FINANCIAL IMPLICATIONS

5.1 A number of Council service areas work in conjunction with Humberside Police to help tackle and prevent crime and disorder and anti-social behaviour; however, it is unclear at this stage as to whether the redesign will have any financial implications on the Council and whether there will be a need for the Council to fill any voids left by a reduction in police allocations and resources.

6. METHODOLOGY

6.1 The Review Panel was set up to establish the extent of the proposed changes in policing and to consider the possible impact on the level of crime and disorder and anti-social behaviour in the East Riding.

6.2 The scope and methodology for the review outlined the objectives and issues that the Panel wished to consider (as set out at Appendix 1).

6.3 Seven meetings of the Panel took place over a six month period. Both the Chief Constable and the Office of the Police and Crime Commissioner were invited to participate in the review at a time mutually convenient to all parties; however, both declined the invitations to attend and did not provide the information requested by the Panel. The Panel was, however, fortunate to meet with the Divisional Commander for the East Riding (C Division), to whom the Panel was grateful for her openness and willingness to engage with the review.

6.4 During the course of the review the Panel met with the following services which are involved in preventing and tackling crime, disorder and anti-social behaviour in the East Riding:

- Resource Strategy
- Anti-Social Behaviour Team
- Domestic Violence Team

- Youth Offending Team
- Drugs and Alcohol Treatment (Public Health)
- Licensing
- Troubled Families

- 6.5 The Panel also called forward the relevant portfolio holders for this review, seeking their views on the subject:
- Councillor Cracknell, Portfolio Holder for Community Involvement and Performance
 - Councillor Owen, Portfolio Holder for Transformation and Strategic Partnerships
 - Councillor Parnaby OBE, Portfolio Holder for Key Strategic Issues

7. LEGISLATION AND GUIDANCE

- 7.1 The Council has a statutory responsibility, under Part 3, Section 19 of the Police and Justice Act 2006, with the power to review or scrutinise decisions made, or activities taken, by responsible authorities (i.e. Humberside Police) in connection with their crime and disorder role.

8. INTRODUCTION

- 8.1 Following the Comprehensive Spending Review of October 2010, the Government announced that central funding to police services in England and Wales would be reduced by 20 percent in the four years from March 2011 to March 2015.
- 8.2 According to the latest report of Her Majesty's Inspectorate of Constabulary, police forces in England and Wales have over the four years of the current spending review (2011/12 - 2014/15) found almost £2.53bn worth of savings, developing savings plans to achieve 96 percent of this savings figure. The outstanding gap will be met by deploying £107m of reserves.⁷
- 8.3 Her Majesty's Inspectorate of Constabulary report went on to state that as budgets continue to be severely constrained, it is inevitable that opportunities for further savings and efficiencies will be fewer, and achieving them will be more difficult. Consideration must be given to how funding will be allocated in the future and how that funding supports more efficient arrangements for local, regional and national policing services. Continuing to administer substantial cost reductions in the next spending round in the same way as this one is likely to place the financial viability of some forces in jeopardy within the next three to five years.⁸
- 8.4 The report also found that police forces across England and Wales have experienced the cuts differently due to variations in local taxation and previous budget restraints. Some police forces are doing well in the face of the cuts.⁹ The magnitude of the reductions facing police forces in England and Wales, however, will no doubt have an adverse effect on the amount of work that can be done by police forces to prevent crime and protect the public.

⁷ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 34)*

⁸ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 34)*

⁹ <http://www.thebureauinvestigates.com/2013/07/13/revealed-police-forces-are-taking-up-to-30-longer-to-react-to-999-calls> (last accessed 26 August 2014)

9. National Picture

- 9.1 The response to the funding challenge has not been without adverse effects on some important areas of policing. Her Majesty's Inspectorate of Constabulary found, in particular, that neighbourhood policing risks being eroded in some places.
- 9.2 By March 2015, the total police workforce (officers, staff and PCSOs) is planned to be reduced by 34,400 (since March 2010), meaning that three posts in every 20 would have been removed (a planned 16,300 fewer police officers than in 2010). These plans estimate that by March 2015 there will be 127,500 police officers in England and Wales - fewer police officers than at any other time in the last decade.¹⁰
- 9.3 Police forces have worked hard to prioritise savings in goods and services (such as supplies, uniforms, estate and vehicles) whilst seeking to protect officer and police staff posts. 29 percent of planned savings over the spending review period come from these non-pay costs, although they make up approximately 20 percent of the overall policing cost base.¹¹
- 9.4 Despite the savings in goods and services, the scale of funding reductions means that police forces still have to reduce the size of their workforces considerably. Forces are restructuring and reconfiguring how they carry out their work in order to protect, although not necessarily preserve, the front line.¹²

¹⁰ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Pages 33-34)*

¹¹ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 34)*

¹² HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 33)*

10. Local Picture

Key Findings:

- **Humberside Police has identified the need to save £34.4m, which is 16 percent of its overall budget**
- **By March 2015, the number of police officers in Humberside will have reduced by 24 percent (495 fewer police officers) since 2010 and there are plans for a further reduction of 210 police officers over the next four years**
- **Planned police staff reductions within Humberside Police will equate to 17 percent (282 fewer staff) than in 2010 and there are plans for a further reduction of 591, 50 percent of which will be achieved through enhanced voluntary redundancies**
- **In addition, over the same time period there have been reductions to the number of Police Community Support Officers (PCSOs) with 69 fewer than in 2010**
- **Her Majesty's Inspectorate of Constabulary has expressed concerns that Humberside Police has not done enough to achieve a sound financial position for the future**

- 10.1 As part of the spending review (between March 2011 and March 2015) Humberside Police identified the need to save £34.4m. As a proportion of its overall budget (£180m), this saving requirement of 16 percent is slightly lower than most other forces; however, “Her Majesty's Inspectorate of Constabulary considers that Humberside Police still faces a particularly difficult challenge.”¹³
- 10.2 Humberside Police is currently undergoing a restructure (‘Building the Future’) in order to meet the demands imposed by the spending review. The new structure will require a reduced number of both police officers, police staff and Police Community Support Officers (PCSOs).
- 10.3 Her Majesty's Inspectorate of Constabulary report states that by March 2015, there will be 1,563 police officers (a reduction of 495 police officers since March 2010). The national average is 11 percent; the reduction in Humberside is 24 percent. An additional 210 police officer posts are still to be reduced (between 2015 and 2018) and it is not clear which areas of Humberside or which specific police services will be adversely affected by this planned reduction¹⁴.
- 10.4 The scale of planned police staff reductions, however, is much higher (591), which Her Majesty's Inspectorate of Constabulary advises is not possible through turnover and, therefore, Humberside Police is looking to achieve 50 percent of this reduction by voluntary enhanced redundancy. The rest is to be achieved by redeployment, efficient management of the establishment (via a recruitment freeze) and, potentially, a small number of compulsory redundancies.¹⁵
- 10.5 Her Majesty's Inspectorate of Constabulary has expressed concerns that Humberside Police has not yet done enough to achieve a secure financial position for the future. Humberside Police has continued to accumulate reserves with the express intent of using them to cushion the impact of funding reductions. Reserves that stood at 17 percent of total spending in 2011/12 are expected to fall to 12 percent by 2014/15. Whilst this means that some of the funding gap has been bridged using an injection of one-off

¹³ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 9)*

¹⁴ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 12)*

¹⁵ HMIC: *Responding to austerity: Humberside Police July 2014 (Pages 9 and 12)*

reserves, recurring savings needed to meet the financial gaps have not been achieved. In the long term this is not sustainable.¹⁶

- 10.6 The saving requirements for 2014/15 are £12.2m but planned savings are only £6.8m (a gap of £5.5m to be bridged by reserves to balance the budget). In 2015/16, there is a savings requirement of £16.3m with planned savings of £12.0m. This savings target is expected to be met from reductions in police officer and staff posts and the implementation of a new operational model.
- 10.7 Her Majesty's Inspectorate of Constabulary is not yet clear, however, which functions will be directly affected by these reductions and, therefore, what the impact will be - which mirrors the Panel's concerns. The Panel is further concerned that without information or a clear plan to show otherwise, the East Riding will be disadvantaged disproportionately and crime levels will increase, a situation that might be avoided through consultation and collaboration with partners and local communities.¹⁷
- 10.8 Because of the scale of savings required now and in the near future, changes need to be made at an unprecedented pace. The medium-term financial strategy 2014/15 - 2018/19 sets out how Humberside Police intends to meet its shortfall in budget; however, even with the continuing use of reserves to balance the budgets, these reductions in spending are dramatically higher than anything Humberside Police has previously achieved.

¹⁶ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 10)*

¹⁷ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 10)*

11. HUMBERSIDE POLICE FORCE CURRENT STRUCTURE

Key Findings:

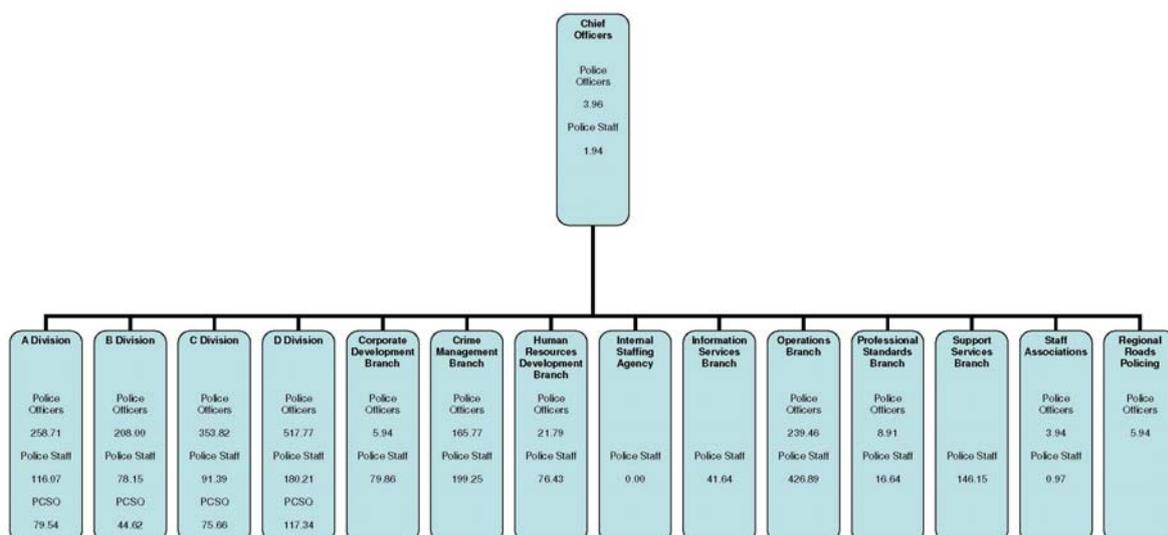
- There are currently three divisions within Humberside Police (on the South Bank two divisions are merged into one)
- Her Majesty's Inspectorate of Constabulary has identified the following reduction in policing numbers over the period of March 2010 to March 2015

	31 March 2010 (baseline)	31 March 2015	Change	Force change %	Change for England and Wales %
Police officers	2,058	1,563	-495	-24%	-11%
Police staff	1,648	1,366	-282	-17%	-17%
PCSOs	317	248	-69	-22%	-22%
Total	4,023	3,177	-846	-21%	-14%
Specials	341	470	129	38%	44%

11.1 Humberside Police is led by Chief Constable, Justine Curran, who took up her appointment with Humberside Police in April 2013. The Chief Constable is responsible for all operational policing matters across the Humberside Police area. The Police and Crime Commissioner for the Humberside Police area is Matthew Grove, who was elected and came into office in November 2012.

11.2 The current Humberside Police structure has three divisions, together with a number of specialist branches and units as follows:

South Bank (combined)		North Bank	
A Division	B Division	C Division	D Division
North Lincolnshire	East Lincolnshire	East Riding of Yorkshire	Kingston upon Hull



File = full time equivalent

¹⁸ <http://www.humberside.police.uk/about-us> (last accessed 29 August 2014)

- 11.3 Humberside Police has two control rooms, one for the North Bank and one for the South Bank. Each Division is provided with its own support and specialist units and there are a number of centralised specialist units, such as crime, operations and protecting vulnerable people. There are currently 36 police stations across the Humberside Police area, 14 of which are in the East Riding.
- 11.4 By March 2015, it is estimated there will be 1,563 police officers across the Humberside Police area.¹⁹

	31 March 2010 (baseline)	31 March 2015	Change	Force change %	Change for England and Wales %
Police officers	2,058	1,563	-495	-24%	-11%
Police staff	1,648	1,366	-282	-17%	-17%
PCSOs	317	248	-69	-22%	-22%
Total	4,023	3,177	-846	-21%	-14%
Specials	341	470	129	38%	44%

¹⁹ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 15)*

12. Crime Figures for the East Riding and Humberside

Key Findings:

- In 2013/14, crime was up 4.9 percent within the Humberside Police area
- The East Riding police division (Division C) has the highest population at 335,887, followed by Hull with 257,204 residents
- In 2013, there were 13,188 recorded crimes in the East Riding of Yorkshire
- The East Riding of Yorkshire is currently covered by 354 police officers
- If police officers were to be distributed across the Humberside area based on percentage of crimes per division, C Division (which covers the East Riding of Yorkshire) should have a minimum of 371 police officers and many more than this if the distribution of police officers was based on the geographical size of each authority

- 12.1 Overall, crime was up 4.9 percent during 2013/14 within the Humberside Police area. Crime levels are still lower than two years previously and considerably down on ten years ago although violent crime rose 9.8 percent in 2013/14²⁰. When considering crime figures for the Humberside area, however, consideration should be given to a report from Her Majesty's Inspectorate of Constabulary in which it is advised that the integrity of Police crime data needs significant improvement.
- 12.2 This raises a key issue in comparing crime levels year-on-year, leaving the Panel unable to ascertain whether the fall in crime in recent years is due to improved policing and co-operation from partners, or instead, due to the under-reporting of crime as found by the Inspectorate. HMIC reported that 27 percent of incidents reported by the public to Humberside Police, which the Inspectorate identified as crimes, had not been recorded by Humberside Police as a crime.²¹
- 12.3 Detailed crime figures for 2013/14 are not yet available; therefore, the Review Panel report makes reference to crime figures for the last two calendar years (2011/12 and 2012/13) in order to give an overview of the current levels of crime over the whole of the Humberside Police Force area.
- 12.4 Comparison tables have been used to show how crime in the East Riding (C Division) compares with the other three Divisions which make up the Humberside Police Force area. Crimes have been broken down by Home Office Category to give a complete picture of the types of crime occurring in each Divisional area.
- 12.5 For comparison purposes, data for the last two calendar years has been used in all areas of the report. The thematic maps use only the last calendar year's data (2013). The cells highlighted in the tables as *ITALICS* represent the lowest figures and the cells highlighted as **BOLD** the highest figures.

²⁰ Office of the Police and Crime Commissioner for Humberside: Annual Report 2013/14 (Page 3)

²¹ HMIC: Crime Data Integrity: Inspection of Humberside Police August 2014

- 12.6 The East Riding (C Division) has the highest population in the Humberside Police Force area, compared with the other three Divisions. It also covers the largest geographical area.

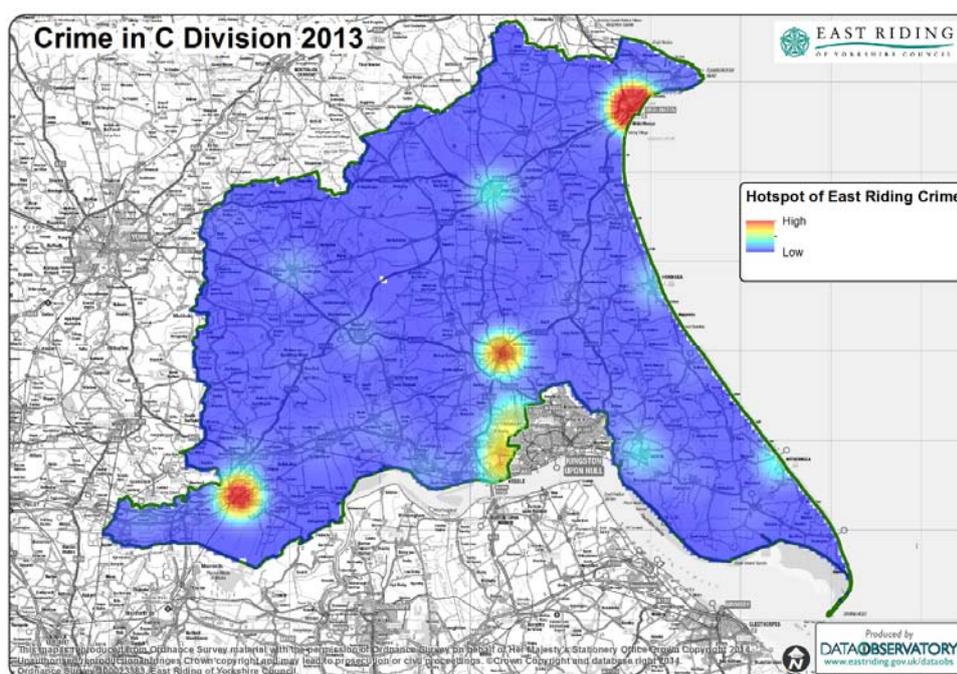
Division	Population ²²	Hectares ²³	% of Population	% of Hectares
A Division - North East Lincolnshire	159,727	19,184	17.3%	5.5%
B Division - North Lincolnshire	168,372	84,631	18.3%	24.1%
C Division - East Riding of Yorkshire	335,887	240,768	36.5%	68.5%
D Division - Kingston Upon Hull	257,204	7,145	27.9%	2.0%
Humberside Police Force Total	921,190	351,728	100%	100%

Recorded Crimes²⁴

- 12.7 The East Riding has the third highest number of recorded crimes in both years within the Humberside Police Force area. Kingston upon Hull (D Division) has the highest levels.

Division	Recorded Crimes 2012	Recorded Crimes 2013	% of Force 2012	% of Force 2013
A Division - North East Lincolnshire	14,155	14,417	22.2%	22.9%
B Division - North Lincolnshire	11,279	9,986	17.7%	15.9%
C Division - East Riding of Yorkshire	14,073	13,188	22.0%	21.0%
D Division - Kingston Upon Hull	24,391	25,337	38.2%	40.3%
Humberside Total	63,898	62,928	100.0%	100.0%

- 12.8 The map below shows the hotspot areas for crime within the East Riding for 2013. The main hotspot areas were in Bridlington, Goole, Beverley and the West Hull villages.



²² ONS Mid 2012 Population Estimates

²³ ONS Census 2011. A hectare equates to 10,000 square metres (100m by 100m)

²⁴ Humberside Police data, downloaded on February 6th 2014 for the period January 1st 2012 to December 31st 2013 (based on the committed from dates).

Recorded Crimes Per 1,000 Population²⁵

- 12.9 The East Riding had the lowest number of recorded crimes per 1,000 population in both years within the Humberside Police Force area. Kingston upon Hull (D Division) had the highest levels in both years.

Division	2012	2013
A Division - North East Lincolnshire	88.62	90.26
B Division - North Lincolnshire	66.99	59.31
C Division - East Riding of Yorkshire	41.90	39.26
D Division - Kingston Upon Hull	94.83	98.51
Humberside Total	69.36	68.31

- 12.10 The East Riding has a relatively low crime rate per head of population, but crime levels in the East Riding are similar to those in North East Lincolnshire and are significantly higher than North Lincolnshire (see table at paragraph 12.7).

Theoretical Crimes per Police Officer

- 12.11 Based on the percentage of crimes per division we can distribute the number of police officers across the Humberside to highlight where officers would be located if proportionally distributed. C Division would have the third highest pull on resources.

Division	Proportion of Police Officers
A Division - North East Lincolnshire	405.74
B Division - North Lincolnshire	281.04
C Division - East Riding of Yorkshire	371.15
D Division - Kingston Upon Hull	713.07
Humberside Total	1,771.00

- 12.12 The following table shows that there is one police officer for every 904 residents in the East Riding, compared to one police officer for every 360 residents in Hull. In terms of area, a police officer in the East Riding has to respond across distances that are 60 times greater than a police officer in Hull, which affects response times. If the allocation of police officers was based on the number of residents per officer by percentage of crime, then the allocation to East Riding C Division would be significantly higher than the other divisions.

Division	Residents per Police Officer	Hectares per Police Officer
A Division - North East Lincolnshire	393.67	47.28
B Division - North Lincolnshire	599.11	301.14
C Division - East Riding of Yorkshire	904.98	648.70
D Division - Kingston Upon Hull	360.70	10.02
Humberside Total	520.15	198.60

²⁵ ONS Mid 2012 Population Estimates

- 12.13 The Panel was informed that from 1 April 2008, the East Riding benefited from 430 police officers²⁶ and the Panel has, therefore, two main concerns; firstly, police officer numbers may have fallen disproportionately over the last six years, when compared to other Council areas and secondly, whether there are sufficient numbers of police officers to respond in a timely manner across the vast size of the East Riding to its level of crime.
- 12.13 It is understood that the East Riding of Yorkshire is currently covered by 354 police officers. With the current level of police officers, over 13,000 crimes were recorded within the East Riding in 2013. As a result, the Panel raised concerns that any reductions in police officers could delay response times, lead to higher crime rates and thus be detrimental to the East Riding.

²⁶ *Humberside Police: Local Policing Summary 2007-2008 : East Riding, page 7*

13. 'BUILDING THE FUTURE' - HUMBERSIDE POLICE FORCE REDESIGN

Key Findings:

- 'Building the Future' is the Humberside Police plan to redesign services so it can operate with fewer police officers
- The new policing model will abolish the three divisions and will be based on four force-wide command areas and a series of 'enabling services'
- Main elements of the redesign include improved call management, use of what is called "predictive" technology and the streamlining of processes

13.1 'Building the Future' is Humberside Police Force's plan to change the way it provides policing and will operate with fewer police officers and staff.

13.2 The new Humberside Police model will be structured around four force-wide 'Command' areas and a series of 'Enabling Services':

The Command Hub	All public contact, duty system, emergency planning - the Hub will have the Control Centre
Communities Command	Neighbourhood policing, hate crime, casualty reduction and alcohol intervention programme etc.
Operations Command	Immediate and high priority response, serious crime response, speed enforcement etc.
Specialist Command	Dogs, surveillance, cyber-crime, sex offences etc.
Enabling Services	Estate services, finance, HR, legal services etc.

13.3 The Humberside Police transformation is programmed for design and implementation over the next seven months, with a scheduled launch date of 3 April 2015. Some aspects of the 'Commands' have already been implemented (such as Humberside Police's Public Protection Unit) and some are being phased in gradually, but the vast majority are still in the design phase and details about how these will work in practice were not available at the time of writing this report.

13.4 Humberside Police has identified that the main elements of its change programme during the current spending review are:

- Changes in business support in areas such as human resources and finance;
- Better alignment of resources to demand;
- Collaboration with other forces;
- Streamlining processes and reducing bureaucracy; and
- Improving the way that operational support functions are provided.

13.5 The response by Humberside Police to future financial pressures will include:

- Improved call management;
- Use of predictive technology;
- Improved IT to streamline processes;
- Collaboration with other parts of the public sector; and
- Improvement in mobile data to increase productivity of police officers on the front line.

14. THE PANEL'S RESPONSE TO HUMBERSIDE POLICE'S 'BUILDING THE FUTURE' PROPOSALS

14.1 Consultation

Key Findings:

- The Panel feels that insufficient consultation and engagement has taken place with partners and local communities
- The Panel is disappointed that the Chief Constable and Office of the Police and Crime Commissioner declined to fully take part in this review and attend meetings
- The Office of the Police and Crime Commissioner has not made arrangements to formally consult with all local communities in the East Riding affected by the planned changes in policing

- 14.2 The Panel considers it reasonable to expect a significant level of engagement and public consultation equivalent to the level of change given the radical change to policing due to take place across the Humberside area by April 2015.
- 14.3 Considerable levels of engagement are not unusual amongst partners in the East Riding. When, for example, Humberside Fire and Rescue Service proposed large scale changes to its services, it carried out large scale consultation events, including presenting in detail to the Council's former Safer and Stronger Communities Overview and Scrutiny Committee. The Committee responded to the consultation and as a consequence, along with other consultation responses from other partners and the public, Humberside Fire and Rescue Service took into consideration the feedback and altered its plans according to public demand. Likewise, when the Council undertook a review of its car parks, a series of roadshows and public events took place across the East Riding allowing residents to put forward their views, concerns and suggestions.
- 14.4 Aside from the Office of the Police and Crime Commissioner's rolling programme of consultation (street surgeries, focus groups and social media) it appears to the Panel that there will be no such large scale consultation/engagement exercise. Instead, the Panel felt that information was being released by Humberside Police to partners and the public in a somewhat ad hoc manner which was impeding proper consultation from taking place.
- 14.5 As a key partner, the Panel felt that the Council should expect to receive a high level of engagement from Humberside Police on its redesign plans. Since January 2014, Council officers had been invited to attend a few briefing sessions on Humberside Police's 'Building the Future' plan. Officers felt, however, that the information provided at these meetings was limited, despite the fact that a number of the changes to Humberside Police's redesign would require the help and cooperation of local authorities. Officers informed the Panel that this would be difficult to achieve if the local authorities were unable to take part in in-depth discussions with Humberside Police and expressed the hope that future briefing sessions would provide more comprehensive and detailed information.
- 14.6 The Panel felt that all communities should have a chance to comment on the planned changes to the way policing in the East Riding and other parts of the Humberside Police area is delivered. Feedback from town and parish councils and voluntary groups in the East Riding shows that they were unaware of the policing changes. The Panel stressed the importance of Humberside Police ensuring comprehensive engagement, consultation and feedback with all partners and stakeholders.

- 14.7 In an article relating to a rise in the precept, posted on the Office of the Police and Crime Commissioner’s website 31 January 2014, the Police and Crime Commissioner was quoted as saying, “I asked the Chief Constable to redesign a sustainable policing service for the area, and her plans are well advanced. We will make sure that public and partners are informed as these plans develop.” As of September 2014 when the review came to a conclusion, the Panel felt it was evident that Humberside Police had failed to ensure that the public and partners were being kept informed of the reforms process in light of the view that the changes were "well-advanced".
- 14.8 At the Humberside Police and Crime Panel meeting of 30 June 2014, the Police and Crime Commissioner stated that the Chief Constable had visited and had been working with local authorities on the Force redesign. This has not been the case with East Riding of Yorkshire Council, with the Chief Constable not attending the Review Panel and reluctant to answer the questions set. Likewise, the Office of the Police and Crime Commissioner offered an invitation to all local authorities to speak with them on the restructure, yet despite a number of invitations the Police and Crime Commissioner refused to attend a meeting of the Review Panel. The Panel was disappointed that in light of this open invitation, the Chief Constable and the Police and Crime Commissioner had declined to speak to the Panel on a number of occasions, as their input would have been greatly appreciated.
- 14.9 The Panel compiled a series of questions it wished to pose to the Police and Crime Commissioner (see Appendix 2) but the decision of the Police and Crime Commissioner not to engage with the Council’s review has left the Panel with a large number of unanswered questions and few assurances that the changes brought about by the Humberside Police redesign will not be to the detriment of East Riding residents.
- 14.10 Rather than working with partners to help transform policing for the benefit of the community, the Panel feels that the ‘Building the Future’ plan will be presented as a *fait accompli* with the expectation that partners will ‘fall in-line’. The public sector is in a time of shrinking budgets, and as a result, the need for partnership working, which is both cost effective and necessary, is more important than ever. The Panel called into question the level of partnership working and engagement that was taking place on financial and resource planning, particularly with the East Riding. Her Majesty’s Inspectorate of Constabulary has also raised the same issue about Humberside Police not consulting the public, this time over the Police’s policy decision not to attend all reports of crime and incidents in the area.²⁷

Recommendation 1	
Primary Recommendation	That Humberside Police fully engage with East Riding of Yorkshire Council on the Force’s redesign plans and any impact this may have on the work of the Council so that the two organisations can work in partnership in an open and transparent nature for the benefit of East Riding residents.

Recommendation 2	
Consultation	That a timetabled programme of consultation be developed on Police service changes with all local communities in the East Riding, which includes details of how feedback will be used to shape Humberside Police’s transformation plans.

²⁷ HMIC: *Core business: An Inspection of crime prevention, police attendance and use of police time* (letter dated 3 September 2014)

15. Implementation Timeframe for 'Building the Future'

Key Findings:

- **The Panel is concerned that the "Building the Future" redesign process is taking place over too short a time scale which is impeding proper engagement and consultation from taking place**

- 15.1 HMIC has raised concerns that Humberside Police has not yet done enough to achieve a secure financial position for the future. Whilst this is fully acknowledged by the Panel, the Panel feels that Humberside Police is making changes at an unprecedented, and in the Panel's view, unnecessary pace.
- 15.2 It is not evident to the Panel why the significant changes to Humberside Police must be implemented in such a short timeframe (by April 2015), given the nature of change. Whilst the Panel appreciates that plans need to be put in place quickly to provide assurances that the savings can be achieved without any risk of impact on service provision to the public, the Panel feels that by implementing its redesign plans in such a short period of time, Humberside Police is jeopardising its operations and financial sustainability in the long term.
- 15.3 The Panel recognises that bringing about a shift in the organisational culture is critical to the success of introducing the new way of providing policing to the Humberside area; however, cultural change is notoriously difficult to implement in a short time frame and therefore casts doubt as to whether this will be achieved within Humberside Police's timescales.
- 15.4 It is essential with such large scale change that all aspects of the plan are tested and that implementation of each Command should not take place until Humberside Police and its partners are satisfied that it will be effective in operation. The Panel expressed concerns that by implementing all aspects of each of the four Commands and Enabling Services simultaneously, this would create additional problems. The Panel strongly urges the Chief Constable and the Office of the Police and Crime Commissioner to consider the cumulative impact and to delay the start date of change and to consider a phased implementation to the redesign process.

Recommendation 3

Implementation Timeframe for 'Building the Future'	That the Humberside Police redesign process be implemented over a longer period of time in order to enable a phased approach to be taken in collaboration with all partners and local communities.
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16. Reserves and Precept

Key Findings:

- It is not clear where the additional revenue gained by raising the police precept by 1.99 percent and the £32m held in reserves will be used by the Office of the Police and Crime Commissioner to achieve adequate levels of policing in the East Riding.
- The Police and Crime Commissioner holds £32.972m in reserves

- 16.1 As stated in the report 'Police Precept for 2014/15 and Medium Term Financial Strategy 2014/15-2018/19' presented to the Police and Crime Panel on 4 February 2014, the Office of the Police and Crime Commissioner holds £32.972m in reserve.²⁸ Whilst some of this reserve has been ear-marked to help bridge the gap and balance the budget over the next two to three years, the Panel asks that the Office of the Police and Crime Commissioner considers using a greater portion of the reserve to help reduce the planned staff reductions over the next few years.
- 16.2 Despite the sizeable reserve and the potential for in year underspend, the Office of the Police and Crime Commissioner raised the precept by 1.99 percent, leaving residents to partly fill the budget deficit. The Panel felt that East Riding residents should not be expected to bear the brunt of precept increases, particularly if resources and police stations were to be reduced/withdrawn across the East Riding and without full consultation on the police changes.
- 16.3 The Police and Crime Commissioner has been quoted saying, "Humberside Police belongs to local people, it is not my police force or the Chief Constable's, it is yours. The precept is the taxpayers' investment in that service." The Panel considered the perception of an East Riding resident who might well resent paying an increased precept whilst at the same time seeing a possible reduction in police officers, stations and funds to local communities. The Panel felt that it was only reasonable that East Riding residents receive value for money and an equitable service in comparison to the other local authority residents.
- 16.4 Whilst the public appreciates the need for an effective response by Humberside Police to meet the national financial constraints all public sectors face, it must be undertaken without adversely affecting the level of policing paid for by the public.

²⁸ Report to the Police and Crime Panel 4 February 2014: Police Precept for 2014/15 and Medium Term Financial Strategy 2014/15 - 2018/19 (Page 23)

17. IT and Mobile Technology

Key Findings:

- A trial has shown that officers spend more time on patrol when they have access to mobile technology
- Humberside Police plans to use hospital, retail premises and residents' Wi-Fi connections when visiting their homes
- The government Public Services Network scheme may be of benefit to Humberside Police as they look to embrace technological advances to bring about efficiencies
- There was insufficient information to give the Panel confidence that an IT and mobile solution could be implemented reliably and securely by March 2015 for frontline police officers particularly when visiting remote locations in the East Riding where Broadband and signal strength remains an issue.

- 17.1 Information Technology has enormous potential to enable systems and processes to be automated and for customers to be able to self-help. The emergence of mobile technology allows officers to perform more tasks and activities while remaining visible in the community.
- 17.2 In February 2014, the Office of Police and Crime Commissioner was jointly awarded with South Yorkshire Police a £1m funding grant from the Home Office to be used solely for the development of mobile technology. This included tablet devices and lightweight laptops, to free-up police officers and PCSOs from administrative duties, so they could spend more time on the beat protecting local communities.
- 17.3 A trial using the new mobile technology found that officers spent up to two hours extra per shift on patrol when they had the mobile technology with them. Building on the success of the trial and using further Home Office funding, Humberside Police intends to roll out the programme of mobile technology across the whole of the Humberside Police Force area.
- 17.4 A large part of the 'Building the Future' plan is heavily reliant on Humberside Police being able to increasingly use mobile technology. The Council is well placed to understand the difficulties of redesigning services to make better use of technology through the work and research that has taken place as part of the Transforming East Riding business transformation programme. It quickly became apparent to the Council that this was a highly complex area requiring effective testing and analysis to determine how technology can be best used to increase effectiveness and efficiency of services without isolating those customers who cannot or are unwilling to use non-traditional communication methods. It is also unclear to the Panel what Humberside Police vision for its virtual customer service centre is and how this compares to its current communication and customer relation strategy.
- 17.5 The Panel is also concerned that Humberside Police will become overly reliant on IT and mobile technology solutions to help produce the significant savings required and maybe overstating the productivity benefits, particularly if mobile technology does not function properly in areas of rural East Riding due to poor Broadband and signal coverage.
- 17.6 Reservations were also expressed by the Panel over the fact that Humberside Police was considering using residents' Wi-Fi connections when visiting. This would require residents to divulge their Wi-Fi password to officers which could create fear of security and data protection risks.

- 17.7 The Public Services Network (PSN) is creating one single network that will result in a more cost-effective and efficient ICT infrastructure. PSN provides a secure private internet for organisations across central government and the wider public sector, replacing hundreds of disparate and disconnected infrastructures.²⁹ The PSN will substantially reduce the cost of communication services across UK government and enable new, joined-up and shared public services for the benefit of citizens.
- 17.8 The Council is working with Virgin Media Business along with other public services to progress the PSN and the Panel heard that Humberside Police is participating in this project, which will improve the benefits and efficiencies of modern technology. The Panel stressed the need for Humberside Police to work more closely with the Council and other partners to exploit new technology and different ways of working to save money and to create a greater service for residents of the Humberside area.
- 17.9 Finally, serious concerns around the optimistic timescales involved in Humberside Police's redesign programme for IT and mobile working were raised by the Panel, which felt that further consideration of the implications of introducing new technology was required.

Recommendation 4	
IT and Mobile Technology	That Humberside Police and the Council continue to work towards the identification and approval of further opportunities for joint working, particularly through the use of new technology and agile working arrangements where there is merit in doing so.

Recommendation 5	
IT and Mobile Technology	That Humberside Police engage more fully with local public sector partners to exploit the potential that Public Service Networks provide.

²⁹ <https://www.publicservicesnetwork.service.gov.uk> (last accessed 28 August 2014)

18. Reducing Demand & Customer Service

Key Finding:

- **The Panel has serious concerns about the robustness of the data being used by the Police to evidence its view that 44 percent of calls for a policing response is “waste and failure demand” meaning that residents in their view are inappropriately seeking help from the Police. The Panel would like to scrutinise the Police’s position and ensure the public receive services, and victims the support they require, without being passed from “pillar to post” between police and council services.**

- 18.1 To influence the strategic redesign of Humberside Police, a demand analysis was conducted that included an analysis of ‘calls for service’, called ‘Operation Check’. A snapshot of demand over a single 24 hour period took place in September 2013 to identify ‘true’ demand (what Humberside Police should deal with) and ‘waste and failure demand’ (what Humberside Police should not be dealing with). From this analysis, it was concluded that 44 percent of demand was not police related but represented, for example, calls for help which should be dealt with by social services or other local authority services. Just over half of the calls (58.9 percent) were identified as potentially preventable due to inefficient internal processes.³⁰
- 18.2 This same exercise was repeated again in early 2014 and again the analysis showed that 40 percent of demand had not required a police response. As a result of Operation Check, Humberside Police now aspires to reduce the ‘waste and failure’ demand.
- 18.3 The Panel has reservations over Humberside Police’s findings relating to Operation Check. Members felt that a much wider assessment period needs to be undertaken, taking into account peak periods, such as summer season in Bridlington in order to gather more accurate data and evidence and to ensure a more realistic picture of demand is portrayed.
- 18.4 If indeed it transpires that Humberside Police wishes partners to help reduce its call demand, then open dialogue needs to be undertaken with such organisations. To date no further information has come forth from Humberside Police over its expectations for the Council to respond to Police calls, nor have any discussions been initiated by Humberside Police with the Council to determine how such work streams could and should work.
- 18.5 The relationship between the public and the police is very different from that between the Council and its residents. Whereas residents interact and can relate to the Council on a regular basis (i.e. through the emptying of bins, the stocking up of salt bins, using libraries, repairing roads etc.), the public’s relationship with the police is much more often less frequent. The Panel feels Humberside Police has a challenge ahead in trying to change the way the public view the work of the police and the way the police provide services.

Recommendation 6	
Reducing Demand & Customer Service	That clear procedures are developed and agreed through a joint approach by all relevant partners to customer contact for related services so that communities are clear about who they should contact when in need of help and support.

³⁰ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 19)*

19. Neighbourhood Policing

Key Findings:

- **Currently there are 165 neighbourhood watch groups in the East Riding**
- **The Association of British Insurers states that the likelihood of being burgled in a neighbourhood watch area is 1 in 344; it is 1 in 35 in areas with no neighbourhood watch scheme**
- **The Office of the Police and Crime Commissioner currently provides no funding for neighbourhood watch schemes**

- 19.1 A visible policing presence in neighbourhoods and communities is as important as positive contact between the police and the public, and has consistently been shown to influence public confidence. The value placed by the public on visibility is demonstrated by the findings of the Crime Survey for England and Wales where high visibility was associated with a positive rating of the police.³¹
- 19.2 The Panel understands that there is a significant level of policing activity that is not visible to the public and does not require community-based beat constables. Often these specialists are not visible, operating in plain clothes or utilising covert methods of policing. Nevertheless, publicly visible policing is crucial to delivering an effective local service.³²
- 19.3 Across the country, although forces have worked hard to protect neighbourhood policing, the workload and remit of neighbourhood teams are broadening still further, and higher than anticipated reductions of PCSO numbers are occurring. Police forces recognise the value of neighbourhood policing but in the face of continuing budget reductions many forces have commented that their police service would become increasingly reactive (with a focus on responding to 999 calls and investigating crime) rather than preventing and reducing crime. Forces' ability to prevent crime and reduce demand will be seriously undermined if their neighbourhood teams are materially eroded.³³
- 19.4 The Panel was reassured by the Divisional Commander for the East Riding that neighbourhood policing was a key component of the Communities Command and that although full details were not available for sharing with the Panel at the time of writing this report, the East Riding would receive its fair share of resources at a level that would protect and maintain safe communities.
- 19.5 The Panel also welcomed the news that the Neighbourhood Tactical Unit has evolved from the Bridlington Summer Unit and will now see a team of 40 officers deployed around the Humberside Police area as and when there is demand (i.e. in the summer they will be in Bridlington and in winter they will focus on rural areas where hunting and poaching activities take place).
- 19.6 Support for Neighbourhood Watch used to be provided by the Humberside Association of Neighbourhood Watch Groups (HANWaG) and funded by local authorities and the former police authority. HANWaG stopped providing services on 30 November 2010 but in-house support continued to be provided by East Riding of Yorkshire Council using existing resources. In April 2012, the Council established the post of Community and Neighbourhood Watch Support Officer. The post is part-time (25.5 hours as of April 2013) and the post holder is responsible for developing and maintaining the

³¹ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 107)*

³² HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 107)*

³³ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 36)*

Neighbourhood Watch Network across the East Riding. In May 2012, there were 88 Neighbourhood Watch groups listed in the East Riding - there are now 165 and a further 10 in the process of being set up. Many were newly established groups, others were lapsed groups that had been rejuvenated and a few had re-emerged in response to recent publicity.

- 19.7 The Council is well placed to continue to maintain and develop Neighbourhood Watch alongside Humberside Police and Humberside Fire and Rescue Service but any plans for further development would need to take into account the level of resources currently available.
- 19.8 The Association of British Insurers (ABI) also states that if you live in a non-Neighbourhood Watch area, the likelihood of being burgled is 1 in 35, whilst the chance of being burgled in a Neighbourhood Watch area falls to 1 in 344.
- 19.9 Local policing should be shaped by local people, who have the local knowledge and know the requirements for that community. Ward, town and parish councillors should have the opportunity to lead discussion in their areas on the police proposals to help shape the level of police services in their local area. Equally the Council must be kept informed of the Force’s intentions to reduce any services so that it too can plan accordingly so that residents are not disaffected and remain safe.
- 19.10 The Police and Crime Commissioner, during a meeting of the Corporate and Communities Overview and Scrutiny Sub-Committee on 17 October 2013, welcomed the work of Neighbourhood Watch and acknowledged that this is an excellent tool to reduce crime. The Office of the Police and Crime Commissioner, however, has decided not to provide matching financial support for the Neighbourhood Watch scheme in the East Riding. The Panel was disappointed to learn of this decision as it leaves the Council to fully fund the local scheme, even though the former Police Authority contributed to the cost. In addition, it was an election pledge of the Police and Crime Commissioner for neighbourhood watch groups to take on a greater role, “I am totally committed to Neighbourhood Watch and Neighbourhood Network Groups and want to help them to take on a greater role.”³⁴ The Panel would welcome clarity from Humberside Police and the Police and Crime Commissioner over what funding is or will be made available for such neighbourhood schemes.

Recommendation 7	
Neighbourhood Policing	That Humberside Police set out how communities can regularly influence the design and delivery of neighbourhood policing to ensure that their specific needs are met and that this be achieved by consultation with ward councillors and town and parish councils.

Recommendation 8	
Neighbourhood Policing	That the Office of Police and Crime Commissioner reconsiders its decision to not provide match funding for Neighbourhood Watch schemes in the East Riding

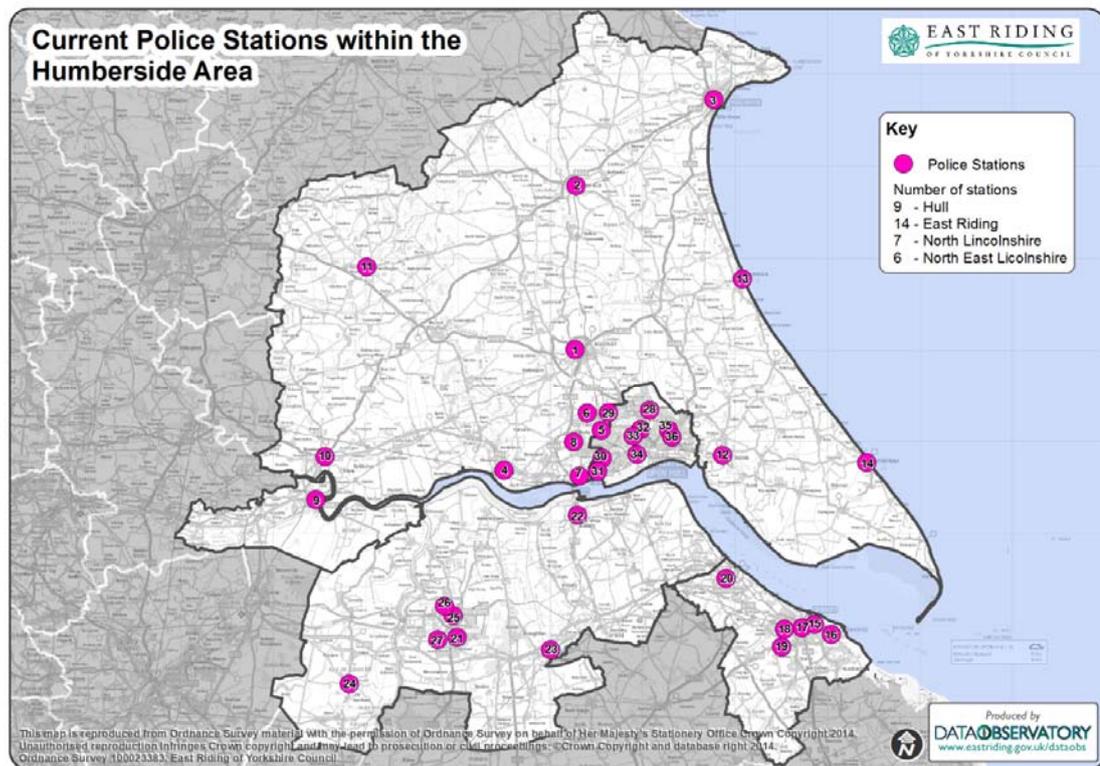
³⁴ Election campaign material titled: Matthew Grove *Working for You*

20. Police Stations, Response Times and Estate Functions

Key Findings:

- There are 36 police stations in Humberside with 30 front counters
- The East Riding has the largest number of police stations but is also the largest geographical area
- Her Majesty's Inspectorate of Constabulary reports that by March 2015, 21 police stations will close
- There are currently 14 police stations in the East Riding and 9 in Hull (13 on the south bank), but no detail was provided to confirm where these 21 police station closures would take place over the next 7 months.

20.1 There are 36 police stations across the Humberside Police. Whilst the East Riding has the largest number of police stations across Humberside Police area (14) it also has the largest geographical area. HMIC predicts that by March 2015 this will reduce to 15 police stations with 26 front counters.³⁵



20.2 A reduction in police stations would appear to be at odds with what the Police and Crime Commissioner stated in his manifesto before being elected, “that no police stations will close under my watch.”³⁶ This was also reiterated at a meeting of East Riding of Yorkshire Council’s Corporate and Communities Overview and Scrutiny Sub-Committee on 23 January 2014 when the Deputy Police and Crime Commissioner addressed the Sub-Committee.

20.3 The East Riding is the largest geographical area across the Force. Hull on the other hand has the smallest geographical area of the Force, yet has nine police stations. The strategic placement of police stations across the East Riding is a necessity, given the size of the area.

³⁵ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 23)*

³⁶ www.policeelections.com/candidates/humberside/matthew-grove/views/

- 20.4 With the current uncertainty over the future of the police stations in Withernsea, Hessle and Driffield, the Panel questioned the timing of the refurbishment of the Bransholme police station (in Hull), at a cost of £710,000.
- 20.5 Police stations are a symbol of a policing presence and the Police and Crime Commissioner has pledged for longer opening hours and for the public to have the option to contact the police at a police station³⁷. Whilst it is acknowledged that ways by which members of the public want to access police services are changing, there is still the need to balance the requirement for change and modernisation against public perception.

Response Times

Key Findings:

- **Humberside Police is one of just five police forces across the country that does not measure response times in rural areas**
- **Currently, there are 17 police operational bases in the Humberside Police area; there are plans to reduce these to five**

- 20.6 Her Majesty's Inspectorate of Constabulary examines whether forces are taking longer to respond to calls for help from the public as a result of workforce reductions and other changes designed to save money.
- 20.7 Most police forces set target times for responding to urgent incidents in rural areas under the best value system. However, Humberside Police has not set targets and, therefore, does not monitor response times. The Panel believes this is a crucial flaw in measuring the success of changes to policing because the police cannot monitor performance levels and put into effect improvements where needed, or be held accountable by the public for poor performance. Her Majesty's Inspectorate of Policing is concerned response times nationally are increasing following the funding constraints and it would be sensible to monitor response time performance.
- 20.8 Of additional concern to the Panel is the reduction in operational bases across the Humberside Police area. Currently there are 17 operational bases; however, under the redesign plan these are to be reduced to just five (Bridlington, Goole, Grimsby, Hull and Scunthorpe). The Panel raised concerns that the reduction in the number of operational bases would lead to longer response times with officers having to travel from further afield to attend incidents, a major issue for the East Riding due to its large rural geographic area. Incidents such as the armed robbery which took place in January 2014 at Hornsea post office is still fresh in people's minds which was reported to have lasted 20 minutes before the police arrived. A second robbery occurred also at a post office in Bilton a few weeks later. Both incidents are unsolved and the Hornsea robbery case is now closed.

Estate Functions

- 20.9 The Panel felt that before a reduction of police stations takes place by Humberside Police, there is a need for the Police to develop a detailed estates strategy that will rationalise its use of buildings and complement the new way of providing policing. Humberside Police will then be in a stronger position to determine where police stations and front counters will be required.
- 20.10 Humberside Police's implementation of its redesign comes at a time when the Council and other public sector partners are under similar resources pressures, having to reduce

³⁷ <http://www.humberside-pcc.gov.uk/Matthew-Grove/About-Matthew.aspx> (last accessed 8 September 2014)

budgets and make savings. The sharing of assets can be hugely beneficial and whilst the Council is keen to engage with Humberside Police on this matter, such propositions must be carefully thought through to avoid cost-shunting to Councils. For example, the custody suite in Goole was closed without consultation and this has led to cost increases for the Council because East Riding residents are taken to Scunthorpe instead. When an Appropriate Adult is required to attend interviews with the alleged perpetrator, the Council is required to send an officer, at a much higher cost. The Panel is of the view that closing services, such as the custody suite at Goole, will have a number of wider impacts for partners and additional costs to the public purse. In addition, removing vulnerable people from local health and social care support networks was a unilateral step taken by the Police when it would have benefited from meaningful consultation.

Area of Concern	Recommendation 9
<p>Police Stations, Response Times and Estate Functions</p>	<p>That clear information be provided to the public on the proposed number of police stations in the East Riding and expected response times following implementation of Humberside Police's "Building the Future" redesign plan.</p>

Area of Concern	Recommendation 10
<p>Police Stations, Response Times and Estate Functions</p>	<p>That consultation on the closure of any police stations in the East Riding be undertaken by Humberside Police with the relevant local community and town or parish council and all other partners. No area should be disadvantaged by any proposed police station closures.</p>

Area of Concern	Recommendation 11
<p>Police Stations, Response Times and Estate Functions</p>	<p>That Humberside Police, the Council and other partners consider how the estates function can be better joined up across the East Riding to make more cost effective use of resources such as shared back office and frontline information, advice and guidance.</p>

21. Policing Numbers

Key Findings:

- **East Riding residents contribute the most to the Police precept yet are allocated the second lowest proportion of police officers across the Humberside Police area**
- **The move to centralised services may lead to the loss of localised knowledge and less opportunity to work alongside the public to tackle crime**
- **It is not clear which areas of Humberside will be adversely affected by the additional planned reduction of 210 police officers and 69 police community support officers. The planned police officer reduction in Humberside is the highest in the country. The national average is 11 percent, Humberside 24 percent.**
- **HMIC states that Humberside Police intends to reduce the number of PCSOs by 24 percent by 2015, which is higher than the national average**

- 21.1 East Riding residents contribute the most to the Police precept yet receive the second lowest proportion of police officers across the Humberside Police area. Whilst other areas covered by Humberside Police may warrant more resources due to their high crime rate per head of population, it should be remembered that the East Riding also experiences significant levels of crime that require an appropriate share of resources.
- 21.2 Whilst it can be difficult to determine the exact number of police officers patrolling the East Riding at any one given time, due to shift patterns and other branch units working transiently throughout the East Riding, it is important that the public is satisfied they live in a safe and well-policed area.
- 21.3 With the move to centralise all Commands and disband the four local divisions, it is important that the East Riding is not disproportionately affected and that there are an appropriate number of officers allocated solely to the East Riding. The Panel expressed concerns that the loss of the East Riding Division could be detrimental to local communities as the strong connections that have been established within our local communities and the sharing of information could be weakened. Centralised decisions around the allocation of resources could also lead to a disconnect between the decision makers and the local knowledge that currently exists in C Division.
- 21.4 According to Her Majesty's Inspectorate of Constabulary, Humberside Police intends to reduce PCSOs, often referred to as the life blood of the rural community, by 24 percent by 2015, thus reducing their ability to work with communities and neighbourhood policing. The Panel calls for reassurances that residents in the East Riding will not face a disproportionate reduction in police officers, PCSOs and police stations compared to other areas, both within Humberside and nationally.
- 21.5 Focusing police resources on major centres such as Hull, Scunthorpe and Grimsby and centralising police stations could make the East Riding vulnerable to being targeted by criminals. There needs to be an effective level of policing in the East Riding for the long term if the Office of the Police and Crime Commissioner is to meet public expectations. It is considered that the East Riding area should have a minimum number of 371 police officers.

Area of Concern	Recommendation 12
Policing Numbers	That Humberside Police provide assurances that the East Riding will not be disproportionately affected by a reduction in policing numbers and resources, and that its local communities remain safe and protected in the future.

22. RESPONSE FROM EAST RIDING OF YORKSHIRE COUNCIL STAKEHOLDERS

22.1 The following responses were made by key stakeholders within the Council and many of the points made echo the concerns of the Panel:

- Key Elected Members have not been privy to any detailed information or opportunities to feedback on the proposals being put forward by the Police which is a major concern due to the nature and scale of the proposed changes.
- The public expects an effective response from the Police, as a public sector organisation, to meet the national financial constraints we are all facing. However the response should not adversely affect the level of policing the public pays for. There is concern that the changes will be presented as a 'fait accompli' rather than for true consultation.
- A critical issue for the East Riding is whether residents having paid more for their policing in the Humberside area year on year will end up having fewer police officers and police stations in rural communities and receive a worse service than other areas paying less. East Riding residents will want assurance that their local towns and villages will not face a disproportionate cut in police officers, PCSOs and police stations compared with other areas.
- There is concern that focusing police resources to major centres could make the East Riding a soft target for criminals with slow emergency response to crime taking place given the size of the East Riding area. The level of service that rural communities will have is particularly concerning as communities will lose their local single point of contact if PCSO numbers are reduced and existing strong connections with local communities could be weakened.
- There needs to be clarity about what functions the police will stop funding or doing and what they will continue to support, especially as there is concern that the Council will have to fill more gaps which it cannot plan or budget for if not informed about changes that will impact on services. For example, there needs to be clarity about what functions the police will stop funding or supporting, for example ASB.
- There needs to be a balance between the need to reduce staff and public perception, particularly as the public measures police performance largely through visibility of police on the street rather than through performance data.
- There is concern that the reduction of civilian staff levels will put back office functions onto front line staff, taking up police officer time when they should be out protecting the public.
- The wider impact that the loss of jobs has on the local economy also needs to be strategically considered. The police are already working on losing 495 jobs by March 2015 and the additional 801 reductions add up to almost 1,300 jobs lost for the local area, at a time when there are rising levels of violent crime, robbery and burglary in the East Riding.
- To rush into the changes without meaningful consultation is high risk. It is recommended that the Police Commissioner formally consults the public and gives all residents an opportunity to have their say before implementing the changes and

considers phasing them towards the end of the financial planning period. This will give the police force and its partners, including the Council, the time to discuss and adapt to any proposed changes.

23. CONCLUSION

- 23.1 All public sectors are experiencing similar pressures to make savings in order to achieve the necessary reductions in their budgets. With approximately 80 percent of policing budgets spent on staffing costs, it is unsurprising that Humberside Police must make its savings by reducing the number of police officers, PCSOs and police staff.
- 23.2 The Panel fully appreciates the huge financial pressure Humberside Police is under to reduce its budget and make the necessary savings; indeed, the Council is in a similar position in terms of the need to make substantial savings to its budget. The Panel has concerns, however, as does Her Majesty's Inspectorate of Constabulary around the sustainability of Humberside Police's long term financial planning and seeks clarification and earlier notification of funding for partnership activities.
- 23.3 The scale of change set in motion by Humberside Police's 'Building the Future' plan is unprecedented in its history. For such a radical shift in operations it would seem to the Panel that the redesign process is taking place at undue haste, with an ambitious implementation date of April 2015. The Panel urges Humberside Police to implement its redesign plan over a phased period, allowing for greater analysis and time to streamline services and allowing for a monitoring period and feedback from the public.
- 23.4 The new Humberside Police model provides a fundamental shift away from the traditional Divisional Command structure which currently takes into account the differing geography, rurality, demography and deprivation across the Humberside area. The creation of a new 'one-shoe-fits-all' approach, which will no longer be tailored to local communities with their diverse needs across Humberside raises concerns, particularly as it will lead to the loss of vital local knowledge that officers in Humberside Police have built up over time.
- 23.5 The Panel has been disappointed by the lack of information and engagement on Humberside Police's and the Police and Crime Commissioner's 'Building the Future' plan. In order to ensure a smooth transition and to ensure that crime and disorder levels do not increase in both the East Riding and the rest of Humberside Police area, Humberside Police must work in an open manner with the Council so that resources and finances can be planned for and allocated as necessary. The Panel requests that Humberside Police fully engages and works in conjunction with the Council in a transparent manner during its redesign process.
- 23.6 The information gathered and supplied by Humberside Police to date has left the Panel with more questions than answers. The Panel seeks assurances from Humberside Police that the East Riding will not be disadvantaged by the new policing model for Humberside.

Recommendation 1	That Humberside Police fully engage with East Riding of Yorkshire Council on its redesign plans and any impact this may have on the work of the Council, so that the two organisations can work in partnership in an open and transparent nature for the benefit of East Riding residents.
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TABLE OF ABBREVIATIONS AND TERMS

ABC	Acceptable Behaviour Contract
ABI	Association of British Insurers
ASB	Anti-Social Behaviour
ASBO	Anti-Social Behaviour Order
DIP	Drugs Intervention Programme
HANWaG	Humberside Association of Neighbourhood Watch Groups
HMIC	Her Majesty's Inspectorate of Constabulary
HMP	Her Majesty's Prison Service
IT	Information Technology
MARAC	Multi-Agency Risk Assessment Conference
ONS	Office for National Statistics
PCC	Police and Crime Commissioner
PCSO	Police Community Support Officer
PODAS	Prevention of Domestic Abuse Service
PSN	Public Services Network
YOT	Youth Offending Team

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Report to the Police and Crime Panel 4 February 2014: *Police Precept for 2014/15 and Medium Term Financial Strategy 2014/15 - 2018/19*

ACKNOWLEDGEMENTS

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Laura Waites	Development and Project Officer
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Portfolio Holders

Councillor Parnaby OBE	Portfolio Holder for Key Strategic Issues
Councillor Owen	Portfolio Holder for Transformation and Strategic Partnerships
Councillor Cracknell	Portfolio Holder for Community Involvement and Performance

External Contributors

	Humberside Police
Inspector Matty Wright	Change Communications Lead - Building the Future Programme
Chief Superintendent Judi Heaton	Divisional Commander - C Division (East Riding)

Methodology and Scope	
<p data-bbox="140 353 387 495">Proposed Review, including desired outcomes and objectives</p> <p data-bbox="108 533 424 745"><i>An outline of the issue/ subject area which is to be reviewed. The area of activity being proposed should have strategic significance for the Authority.</i></p>	<p data-bbox="448 152 1506 293">This Review Panel will look at the Police and Crime Commissioner proposals to achieve upwards of a further £30m of cash savings from April 2014 across Humberside over the next four to five years, which are likely to result in substantial changes to the way policing is delivered at the local level in the East Riding.</p> <p data-bbox="448 331 1506 510">At this early stage of the proposals being developed it has been indicated that the focus will be to target reduced resources to the highest crime areas in Hull, Grimsby and Scunthorpe, and to make better use of police officers' time and staff in partnership with others to ensure performance in tackling crime and disorder does not deteriorate.</p> <p data-bbox="448 548 775 584"><u>The aim of this Review is:</u></p> <p data-bbox="448 622 1506 725">To establish the extent of the proposed changes in policing and to consider the impact on the level of crime and disorder and anti-social behaviour in the East Riding in order that it remains a safe place for residents, visitors and businesses.</p> <p data-bbox="448 763 1139 799">The review relates to the following corporate priorities:</p> <ul data-bbox="499 801 1182 913" style="list-style-type: none"> • Maximising our potential • Supporting vulnerable people, reducing inequalities • Reducing costs, raising performance
<p data-bbox="145 1489 384 1592">Areas the Review Panel wishes to consider</p>	<p data-bbox="448 947 1506 1055">The scope of the review will cover the following areas amongst others that may come to light when the detail of the Police and Crime Commissioner's proposals are finalised:</p> <ol data-bbox="448 1093 1506 2101" style="list-style-type: none"> 1. Overview of police budget (size etc.), what the main areas of spend are; how Police is funded e.g. income, grants, precepts; what savings mean and how much of £30m relates to proposals being discussed early in the review process. 2. An evaluation of the rationale and merits of the proposed changes to policing in the East Riding, and whether or not the impact on villages and towns has been appropriately taken into account. 3. To consider whether or not an effective level of policing will be provided across all areas of the East Riding if the proposals are put into effect. 4. To understand and consider the effectiveness of a single Divisional Command structure to cover all of Humberside in place of the current East Riding C Division. 5. The risk from the changes in maintaining a safe place for residents, visitors and businesses and the affect the proposed changes may have on the fear of crime and anti-social behaviour. 6. The risk to the partnership arrangements that are currently in place between Humberside Police, its partners and local communities from centralised control, fewer police officers based in the East Riding and from significantly reducing the public demand and calls for police services. 7. The benchmarking of crime performance data for the East Riding and inspection findings from Her Majesty's Inspectorate of Constabulary including on how the PCC is managing austerity. 8. The efficacy of stopping or reducing grant funding from the PCC to the East Riding for crime prevention initiatives delivered under the community safety partnership, youth offending team, positive lifestyles, and drug intervention programmes. 9. The level of expenditure spent by the Council to tackle crime and disorder, and the level of funding provided by the Council to the PCC. 10. The direct and indirect impacts on the Council to the proposed changes.

Methodology and Scope	
	<ol style="list-style-type: none"> 11. An understanding of the rationale in closing police stations and the deliverability of relocating the activities carried out in them to other public buildings. 12. A review of the proposal to close custody suites in the East Riding in order to understand the advantages and disadvantages of doing so in transporting people to Scunthorpe, Hull and other locations. 13. The impact of the changes to policing proposed by the PCC on other public agencies and the wider public purse including any additional burdens (or savings in duplication etc.) that might arise from other public services responding instead. 14. The extent to which the East Riding community safety partnership, and the Council's crime prevention initiatives, licensing and the responsibilities of other partners, along with local communities can fill the gap from reduced policing in the East Riding on crime, disorder and anti-social behaviour, be more resilient and protect local communities from crime.
<p>Who should be consulted and involved in the Review</p> <p>Officers from within the authority who have the knowledge to be able to contribute to the review should be identified</p> <p>External Partners, Stakeholders and Agencies who are to be invited to attend a meeting of the Review Panel or can contribute positively to the review should be identified and other consultation to be undertaken should be identified.</p> <p>What use would you wish to make of other consultation, e.g. existing data via feedback/Riding Around, commissioning of surveys (if the review impacts on young people consider using the 'Say Something' website to undertake consultation)?</p>	<ul style="list-style-type: none"> • Relevant portfolio holders <ul style="list-style-type: none"> – Councillor Cracknell – Councillor Owen – Councillor Parnaby • Police and Crime Commissioner, and staff • Chief Constable and her representatives • Police and Crime Panel representatives • National Probation Service and Regional Community Rehabilitation Companies (CRCs) • Prison Service • Magistrates' Court • Home Office • Community Safety Partnership (CSP) • Multi-Agency Public Protection Arrangements (MAPPAs) • Multi-Agency Risk Assessment Conference (MARAC) • Community Partnerships • Renaissance Partnerships • Yorkshire Ambulance Service • Humberside Fire and Rescue Service • Humber NHS Foundation Trust • Council services <ul style="list-style-type: none"> – ASB team – Domestic Violence team – Youth Offending team – Public Health (Drug and Alcohol treatment) – Licensing – Health and Wellbeing Board representatives • Third sector groups <ul style="list-style-type: none"> – Victim Support and other relevant support groups – Neighbourhood Watch, Pubwatch, Farmwatch etc. • Ward councillors • Local parish and town councils • Local MPs • Residents • Young people
<p>Overview and Scrutiny Sub-Committee to monitor review recommendations</p>	<p>Safer and Stronger Communities Overview and Scrutiny Sub-Committee</p>

The Work of the Council in Reducing Anti-Social Behaviour, Crime and Disorder

- 1 The Council has a number of service areas that either works in conjunction with the Police or separately to help tackling and prevent anti-social behaviour, crime and disorder across the East Riding.

Anti-Social Behaviour Team

- 2 The Government has introduced many new powers in the last few years and the Council and its partners work with new and existing legislation to ensure ASB is tackled as effectively as possible. The Council firmly believes in early intervention rather than having to resort to legal action. A number of early intervention tools have been successfully used for a number of years (such as Fairway Letters, Acceptable Behaviour Contracts (ABCs), Anti-Social Behaviour Orders (ASBOs), Individual Support Orders, Parenting Contracts, Parenting Orders, Dispersal Orders, Designated Public Place Orders and Closure Orders)
- 3 In particular, the Fairway to ASBO process, which has been in place since 2008 and was written for the East Riding works very well. The team has a good working relationship with the Police, information is shared frequently and the team meet on a monthly basis through the Neighbourhood Policing team. It is likely that the Fairway to ASBO process will become the model for the whole Humberside Police area upon implementation of the Humberside Police redesign.
- 4 The ASB team was only notified in May 2014 by the Police and Crime Commissioner about of the level of funding for this financial year; which was reduced by 6 percent on the previous year. This created significant problems in terms of forward planning and staff resource. Core funding from the Police and Crime Commissioner will hopefully be maintained year on year; however, there is a possibility that under the new arrangements, the team may have to bid for funding in the future. Clarification on this matter is urgently required.
- 5 Concern has been expressed by the Council's ASB team over plans by Humberside Police to centralise its own ASB functions. Geographically, this could prove challenging depending on where resources were targeted. In the East Riding, approximately 70 percent of ASB crimes occur in urban areas, compared to approximately 30 percent in rural areas. If, however, ASB figures are to be absorbed by the whole Humberside Police area, there is a concern that the towns in the East Riding would see a significant drop in police resources for ASB.

Domestic Violence

- 6 The Domestic Violence Adult Service offers support to people living with or fleeing from domestic violence and abuse. The service is available to any resident in the East Riding. Domestic Violence Adult Service workers provide information, advice, guidance, and both emotional and practical support around legal options, housing, welfare benefits, staying safely at home and in high risk cases, finding somewhere else to stay. The service can help individuals remain safely in their own home by providing home security measures, including lifeline alarms, fire checks and personal alarms. The Domestic Violence Adult Service supports any victim of 16 years or over.
- 7 The Domestic Violence Children's Service offers one to one support to children and young people between the ages of 5 and 16 who have experienced domestic abuse and live within the East Riding.

- 8 The Prevention of Domestic Abuse Service (PODAS) offers one to one support to adults and young people over 16 years of age who recognise and want to take responsibility to change their abusive behaviour. PODAS aims to reduce the risk to victims and children by providing an intervention package for those who are at risk of or are perpetrating domestic abuse. The service works with individuals to challenge their views, improve self-awareness and provide strategies and skills for minimising future abuse.
- 9 The Multi-Agency Risk Assessment Conference (MARAC) meets on a monthly basis. The goal of the MARAC is to provide a forum for sharing information and taking actions that will reduce future harm to very high-risk victims of domestic violence and their children. Increasing the safety of men, women and children experiencing domestic violence is the aim of the MARAC.
- 10 The current approach to domestic violence between the Council and Humberside Police is very effective, with victims either self-referring or the police/agents making a referral to the Council's Domestic Violence Team.
- 11 The Panel is concerned that by centralising the Public Protection Unit (just one unit for the whole Humberside Police area which will be based in Market Weighton) resources will be spread more thinly and be focused on urban areas across the whole of the Humberside Police area. If the number of police officers and PCSOs are reduced in and around rural communities then the Panel felt there was a real concern that low risk cases will not be captured (as it is often the PCSOs who capture these incidents/are aware of them as they patrol the communities). The Panel seeks reassurances that the creation of a Humberside Police area-wide plan to deal with public protection will provide either the same or enhanced outcomes across all areas of Humberside as currently exist.

Youth Offending Team

- 12 The Youth Offending Team (YOT) typically includes social workers, education welfare officers, police officers, probation officers and health and substance misuse workers. The East Riding YOT is divided into three teams and each deals with a different area of the youth justice system by working directly with young people, victims of crime and the local community.
- 13 The assessment team's seconded police officer has responsibility for those young offenders issued with a final warning by the police and co-ordinates appropriate interventions. Evaluations have shown that the preventative community projects can result in reductions in crime of up to 40 percent.
- 14 The YOT uses a triage process to identify individuals in need of help. Individuals often become known to the police first and using the Integrated Youth Management System, the YOT works closely with the police to share information.
- 15 The Panel heard that there seems to be growing pressure by the police to work in different ways and there are fears that centralising police youth offending support might have implications for the way the Integrated Youth Management System is run.
- 16 Funding from the Police and Crime Commissioner for the YOT has also been delayed which places a significant financial strain on the YOT as a number of the staff are funded primarily from Police and Crime Commissioner funding.
- 17 There is also concern that if police officers and PCSOs are reduced or removed from certain communities then individuals will slip under the radar of the authorities (as it is often the PCSOs who provide the local knowledge about these young people). Early intervention is vital in making youth offending a success and therefore there are fears that the centralising of resources by Humberside Police will impact on the way individuals are identified.

Drugs and Alcohol Treatment

- 18 The Drugs and Alcohol team is funded by the Council and the Police and Crime Commissioner (£120,000 is funded by the Police and Crime Commissioner and the remaining £180,000 comes from the Public Health grant).
- 19 The Panel felt that the loss of East Riding C Division means that local links with Humberside Police will be lost as Humberside Police moves to a centralised and standardised Drug Interventions Programme (DIP) across the whole of the Humberside area. It is important that new links be established in respect of functions and development of Humber wide strategies.
- 20 There is good police representation on the Joint Commissioning Group. Concerns remain, however, that whilst officers may still attend future meetings, the representative may not be a specialist drugs officer and, therefore, not have the required specialist knowledge. The Panel seeks assurances from Humberside Police that despite the redesign, Humberside Police will continue to send the appropriate specialist officers to meetings of the Joint Commissioning Group.
- 21 The Panel raised concerns over the Humberside Police proposal not to link custody suites to local authority areas. The importance of consulting on these plans in a timely manner was highlighted by the Panel.

Licensing

- 22 The Council is the Licensing Authority and has issued 4,500 licenses, covering 26 different types of licenses. The Licensing Team work with Humberside Police on scrap metal issues and work closely with PCSOs on the Best Bar None awards; however, Humberside Police's priority in terms of licensing lies with those premises which have an alcohol licence.
- 23 Across the East Riding there are 1,300 alcohol licensed premises. Incidents at hotspot areas have been reducing over time; however, it would appear that incidents are increasing in other areas, such as Driffield, Hedon and Hessle. On average there are 20 incidents a week, the majority of which occur before midnight.
- 24 The relationship between the Licensing team and Humberside Police can be challenging and it is rare for police officers to patrol premises the same time as licensing officers in the early hours.
- 25 Between 2005 and 2012, there were only six reviews of licensed premises. Between 2012 and 2014, however, there have been eight reviews, three of which were in the month of March. Reviews usually last between two and three days and are extremely resource intensive, costing around £2,000 each day. If the Police disagree with the decision of the Council's Licensing Act 2003 Committee, they appeal the decision.
- 26 Over recent months, Humberside Police has failed to send representatives to officer coordination meetings. The Council's Licensing Team has been instructed that it can only liaise with Humberside Police's Licensing Team, whereas the Council feels the most appropriate liaison would be between themselves and the Neighbourhood Policing Team. Officers informed the Panel that if police licensing functions were combined with Neighbourhood Policing that would create a far more effective working relationship between Humberside Police and the Council.

Troubled Families

- 27 The Troubled Families programme is a UK Government scheme under the Department for Communities and Local Government with the stated aim of helping troubled families turn their lives around. The Troubled Families Team has been charged with the task of turning round the lives of 505 families deemed to be ‘troubled’; however, the team has identified 569 which exceeds the target given by the Government. The team has turned around 44 percent of this target during the first period of operation.
- 28 The team currently works with families whose parents are in custody. Work is progressing with HMP Humber to work with fathers in prison. This is currently operating as a pilot scheme for the East Riding; however, the Panel felt that there is the need to create a Humber-wide programme.
- 29 PCSOs are the predominant link with the team and officers expressed concerns that if PCSO numbers are reduced, this will have an impact on the effectiveness of the team’s work; the referrals may not be forthcoming and the vulnerable may not be identified. It was also noted by the Panel that engagement with the senior staff at Humberside Police has been challenging.

QUESTIONS FOR THE POLICE & CRIME COMMISSIONER AND HIS STAFF

These questions were intended to be asked of the Police and Crime Commissioner at a meeting of the Panel

- (i) What are the roles and responsibilities of the PCC and his Office and how do these differ from those of the Chief Constable?
- (ii) In the Police and Crime Commissioner's manifesto he states that "Police stations will not be lost on my watch" - how does this marry up with the Force redesign and proposed station closures across the East Riding?
- (iii) How did the PCC arrive at a 1.99 percent rise to the precept?-What other options for a precept rise were considered, or was it solely 1.99 percent?
- (iv) Humberside Police has to make savings of £32m by 2018 - is this figure net or gross? Does this figure take into account the 1.99 percent precept increase?
- (v) Why did the precept rise by 1.99 percent when it is reported the Office of PCC holds £32m in reserve?
- (vi) Does the PCC intend to soften the impact of the £32m savings required by making use of reserves?
- (vii) Will other partners be expected to bear the cost of the PCC's vision for perpetrators entering custody (i.e. providing drug, alcohol or mental health services)?
 - a) Who should provide these services?
 - b) If partner organisations are to provide these services will they receive any financial support from the PCC?

QUESTIONS FOR THE CHIEF CONSTABLE AND HER STAFF

These questions were sent in advance to the Chief Constable, prior to the Force's attendance at meeting of the Panel

General questions regarding the Force redesign proposals

- (i) When is the new Force structure to be implemented?
- (ii) When will the public and key stake holders be formally consulted on the proposed changes? What form will this consultation process take?
- (iii) Are the proposed changes to Humberside Police based on a successful model?
- (iv) What other options have been considered?
 - a. What was the reasoning behind discarding these options?
 - b. Has it been considered to split Humberside Police, having a separate Force for the North and South Banks?
- (v) What are other similar Forces across the country doing to combat the savings required?
 - a. Are they proposing similar changes to their organisational structure?
 - b. How are they consulting and engaging with the public and key stakeholders?
- (vi) Why do we have police stations and why are they situated where they are? Presumably they are needs driven by the community?
 - a. Is it needs driven that we have police stations?
 - b. Are the current police stations in right location? Do they fit in with the new model?
 - c. Does the new model take into account spikes in crime (e.g. rise in crime in Bridlington during summer months)?
- (vii) Has there been a statistical data analysis undertaken of urban need and crime v. rural need and crime?
- (viii) What are the actual numbers of police officers and staff at present based in the East Riding and other areas of the Humber? How are these located across the East Riding (numbers and locations)?
- (ix) How many police officers and staff will remain based in the East Riding following the proposed Force redesign and by 2018 (including PCSOs and volunteers)?
- (x) How will rural communities throughout the East Riding be supported (violence, theft, poaching, lamping and Farm Watch) following the Force redesign?
- (xi) How are policing levels determined for the East Riding and the rest of the Humber area? How do you balance the need for a physical presence against non-uniformed staff?
- (xii) Predictive Policing - how is this being used to inform the Force of its new plans for redesigning the Force?
- (xiii) The East Riding has high crime levels compared to other divisions but a lower rate of crime per 1000 people. How can the Police be confident the East Riding is a safe place to live? People may not report crime due to intimidation or other threats, or because there is a slow or no response when concerns are raised.

- (xiv) High crime areas in the East Riding are Goole and Bridlington but they do not feature in the proposed changes. What therefore is the Force's vision for the East Riding?
 - a. How will the Force ensure the same level of response and resources for the East Riding that other local authority areas will receive?
 - b. If resources are focussed on the three areas of Hull, Scunthorpe and Grimsby and criminals targeted accordingly, will the East Riding not be seen as a soft touch for other criminals?
- (xv) What are the footfall figures for all East Riding Police stations? Whilst these may not determine the need for a police station, is the station needed for incident response?
- (xvi) How can you ensure a quick and efficient response across the East Riding if neighbourhood police stations are closed or staff relocated?
- (xvii) How will crime figures be recorded and analysed under the new Force structure?
- (xviii) What are the crime levels across the East Riding and other divisions year on year?
- (xix) Reducing demand - is this a case of diverting call for services to partners?

Custody suites and pathways to rehabilitation

- (i) Are there plans to close the custody suites in the East Riding?
- (ii) If suites are closed, has it been taken into consideration the extra travel time required of officers to transport offenders to other custody suites and therefore a reduction in police officers in that area as they accompany an offender elsewhere? In reality will not officers be more likely to issue more cautions than having the inconvenience of escorting an offender to a Hull or south bank custody suite?

Mobile Technology

- (i) What were the findings of the trials in Cottingham and Kirk Ella for officers using secure mobile technology?
- (ii) The Deputy PCC reported that using secure mobile technology saved officers up to two hours per shift in the police station which meant that officers were spending up to two hours longer per shift out in the community but how much data/information can be accessed via the secure mobile technology?
- (iii) How exactly has the £500,000 grant been spent on procuring securing mobile technology? Will rolling out secure mobile technology to all front line staff creating significant savings?
- (iv) How is the Force ensuring it will be compliant with data protection legislation in using secure mobile technology at hospitals and in people's homes etc?



E30 - Essex Police

NOT PROTECTIVELY MARKED

Stephen Kavanagh
Chief Constable

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Email: chief.constable@essex.pnn.police.uk
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Our Ref: CC/th

28th November 2014

Dear Lord Bew

Local Policing - accountability, leadership and ethics

Thank you for your letter dated 9 October 2014. I wish to provide the following response to assist you in your review.

Both the Police and Crime Commissioner and I are committed to ensuring that the principles of accountability and high ethical standards are at the core of Essex Police. Alongside the day to day dialogue between us, we have implemented an effective governance regime detailed in the attached structure chart (appendix A) which includes the promotion and delivery of these principles.

A number of the questions raised in the "Issues and Questions" paper you kindly attached to your letter are aimed at the Police and Crime Commissioner whom I am aware is responding direct. In terms of those questions relating to my role I can provide the following answers:-

25 vii Are the boundaries between local roles of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

The local communities in Essex appear to understand the separate and distinct roles I and the Police and Crime Commissioner hold. The importance of regularly highlighting the distinction to the public is recognised. By way of example, the PCC holds quarterly "Essex Police Challenge" events which are public meetings where he holds me to account and aims to give members of the public the chance to raise any concerns about policing and crime in Essex. I provide the audience with both a countywide and local update on force performance and any key issues for their area. This is followed by an open question and answers session from the audience and includes those that have been submitted in advance. These meetings form an important part in allowing the public and PCC to openly scrutinise the work of Essex Police and hold me accountable.

My office receives correspondence from local communities from the Office of Police and Crime Commissioner (OPCC), a proportion of which relates to operational

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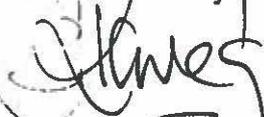
**taking a lead in
making Essex safer**

www.essex.police.uk

3. The force 'Plan on a Page' has been introduced (attached, appendix C). The plan has the core values as the basis for all other aspects of policing.
4. Essex Police has mainstreamed the Codes of Ethics within all training programmes. A cultural change programme entitled 'PASSION in Policing' is to be launched in the spring with a focus on integrity and public service and will be delivered to the entire workforce.
5. I ensure the disciplinary process operates fairly, consistently and ultimately operates in the interests of the public. As Chief Constable I have made it clear to officers and staff that I will offer them strong leadership, that I set high expectations for values and integrity and that I will support those who act professionally according to those values. I have also made it clear that those who do not meet the standards I expects will be dealt with fairly but firmly. I have introduced a new Head of Professional Standards who will deliver this work. Part of her role has been to maintain and promote the anonymous reporting line.
6. The behaviours and values within the code of ethics are not new but need to be projected through all our activity. This message needs to be continually promoted and enforced throughout the organisation and I personally do this by giving inputs on all initial training courses, passing out parades, police staff inductions, talk back live focus sessions with officers and staff, detective accreditation ceremonies, senior leadership meetings and the weekly Chief's blog where I emphasise the values I expect from my workforce and promote examples where this has been evident.
7. Recruitment, selection and promotion processes include the criteria of professionalism which includes ethics and standards and emphasis is placed on candidates evidencing this area throughout the process. I attend and deliver inputs to cohorts of candidates ahead of selection processes.
8. I promote greater inclusion of the staff associations in a wide range of issues to ensure appropriate and real transparency of ethical decision making.
9. I have held a series of roadshows aimed at Sergeant through to Superintendents and support staff equivalents where I set my expectations of behaviour and standards. I

I hope this gives you what you need in terms of informing your review and of course will be delighted to host your colleagues on the 8th December when we will get to expand on some of these issues.

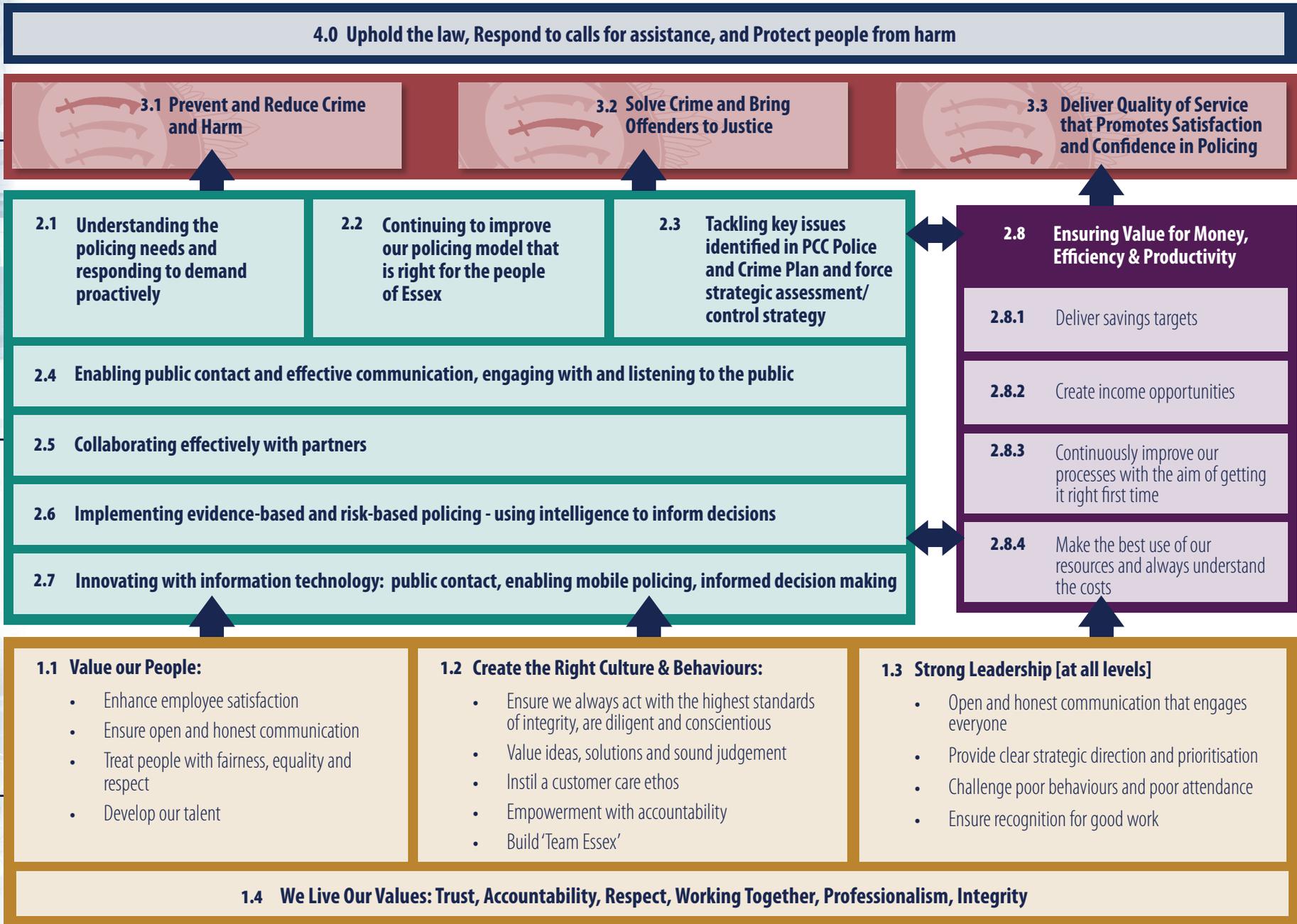
Yours sincerely



Stephen Kavanagh,
Chief Constable of Essex



PLAN ON A PAGE



Why are we here?

What will we be good at?

What underpins our success?

Police and Crime Commissioner for Essex (PCC)

Governance Structure

Chief Constable

Appointed by the PCC,
confirmed by the Police and
Crime Panel
Delivers effective and efficient
policing for Essex

PCC

Elected by the people of Essex
Sets the Police and Crime Plan
Commissions community safety,
and victims' services
Holds the Chief Constable of
Essex to account
Sets the Policing Budget

Police and Crime Panel

Representatives from each
district and unitaries, plus two
independent members
Holds the PCC to account for
delivery of the Police and
Crime Plan

Strategic Policing Board

Advises the PCC on strategic issues in relation to the
future of and vision for policing in Essex

Finance Committee

Considers finance reporting of Essex Police and the PCC

Ethics and Integrity Committee

Considers ethics and integrity in relation to key
strategic policing matters both current and future

Audit Committee

Considers internal audit and risk matters of Essex
Police and the PCC

Performance and Scrutiny Meetings

Considers performance of Essex Police against the
Police and Crime Plan, and other strategic areas

Essex Police Crime Commissioner: Ethics and Integrity Committee:

Terms of Reference:

Purpose:

The purpose of the Ethics and Integrity committee is to inform the PCC and Chief Constable on matters relating to the ethics and integrity of policing in Essex.

Governance:

The committee will report into the Essex PCC Strategic Policing Board.

Scope:

The committee will consider ethics and integrity in relation to key strategic policing matters – both current and future. Their considerations will inform the work of the PCC and Chief Constable.

Examples of possible areas of focus for the committee are set out in Appendix A.

Out of scope:

- The committee will not review operational issues or individual cases. However, it may have regard to themes emerging from operational issues.
- The committee will not be responsible for advising on individual complaints made against individual police officers or members of police staff
- The Committee will have no decision making powers

Definitions:

For the purposes of the committee, the following definitions shall apply:

Integrity:

The conviction that Essex Police should comply, not only with the letter of the law but also with the spirit of the law and with Police Regulations, and that Essex Police Officers and staff behave in a way that attracts public trust and confidence. This includes the moral courage to do what is right regardless of personal interest or influence.

Ethics:

The set of behaviours, values and beliefs which underpin policing in Essex. This means that the Police will consistently demonstrate behaviours and values that the public believe to be morally right when upholding the law.

Membership

- PCC – Chair
- Deputy PCC
- Chief Constable
- Deputy Chief Constable

- Executive Director Office of the PCC and / or Assistant Director of Performance and Scrutiny
- 3 independent advisors - appointed by the PCC. (These will be 3 of the 5 independent advisors who sit on the Strategic Policing Board).
- Essex Police Head of Professional Standards and Discipline
- Essex Police Director of Shared Services

Attendance:

The PCC may invite additional staff, officers or individuals to attend meetings at his discretion, in relation to any particular matter which may be considered by the committee.

In advising the PCC, the Sub Committee will at all times have regard to the College of Policing Code of Ethics, the Nolan Principles and any other statutory or non-statutory code or guidance relevant to the ethics and integrity of policing.

Meetings:

The Committee will meet a minimum of three times a year and will produce an annual report of its work within three months of the end of each financial year.

Work programme:

The committee shall agree a work programme at the beginning of each financial year, setting out their proposed areas and themes of focus. This will not prevent additional themes being added, but will enable forward planning and preparation for meetings.

Appendix A:

Without limiting the Committee's role, the committee may consider the following matters in relation to ethics and integrity: -

- Judgements about defining the harm resulting from crime.
- Lessons arising from case work on Police misconduct.
- Scrutiny of sanctions for misconduct to ensure fairness and consistency.
- Lessons learned from the handling of complaints.
- The conduct of undercover officers.
- Payments to informants.
- Scrutiny of Essex Police commitment to equality and diversity.
- The operation of the vetting system.
- Determining conflicts of interest where police officers/staff have second jobs.
- Police officers who receive criminal convictions.
- Issues in relation to the appropriate use of force.
- The use of cautions and other out of court disposals.
- The abuse of authority and
- The Essex Police whistleblowing policy and conduct towards whistleblowers.

CSPL Response November 2014: Essex PCC submission

Contact: Carly Fry, AD Performance and Scrutiny
carly.fry@essex.pnn.police.uk 01245 291 643

CSPL questions and responses

- i. Are there any gaps in the existing mechanisms for holding PCCs to account?

There may be some gaps in mechanisms for holding PCCs to account as follows:

Petitioning by the public: Under specific circumstances, there should be opportunities for the public to submit concerns about their local PCC via a petition. For example, where the public feel that the PCC has brought the post into disrepute. These concerns should be brought to the attention of the Police and Crime Panel for further consideration.

The role of the Police and Crime Panel: The PCP should have a stronger role to play in the recall of PCCs, however, there should be appropriate constraints put around this role.

One potential route might be for the PCP to give the public two weeks' notice of their intent to challenge the PCC; the PCP would then have to demonstrate that their intention to pass a vote of no confidence was supported by the 20 per cent of the electorate (and the electorate would need to demonstrate this with one vote per registered voter), and a vote of no confidence would then need to be carried by at least two-thirds of the panel, which is in line with the current requirement for disagreeing with the appointment of a new Chief Constable.

Clarity on Deputy PCCs: There is some merit in the 'double ticket' approach, as this may make it clearer for the public as to who will act up as PCC should be PCC be incapacitated. This should be easier to facilitate at the second set of elections, now that PCC professional offices are established.

The PCC for Essex has recruited a professional DPCC via open competition because he needed to bring expertise into his office in the first term.

Clarity on OPCC Chief Executives' (CEX) role in case of PCC departure: The Essex Office of the PCC is of the view that this should only happen when it cannot be avoided and that when this situation does arise, it should be treated in a similar way to the discharging of functions in local government when the elections are being held at council in question, and the organisation is in purdah.

- ii. What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

The Essex PCC has utilised a number of different methods, which are working well in Essex. He has adopted an Ethics and Integrity Framework¹, which sets out:

- the standards and behaviours that the public can expect from the PCC, his Deputy and his office;
- how the PCC is accountable to the public, and how the public can in turn hold him to account; and

¹ <http://www.essex.pcc.police.uk/ethics-and-integrity-framework/>

- how the PCC holds the Chief Constable to account in the important areas of standards, public life and public service.

Delivery of the framework is supported by the new Strategic Policing Board and its Ethics and Integrity Committee, which include five Independent Members², and by the new Police Code of Ethics³. The framework can be found in full at Appendix One.

The Essex PCC publishes details of all PCC activity including scrutiny meetings holding the force to account, as well as the Essex Police Challenge, where the PCC holds the Chief Constable to account and the public can ask questions. Public meetings are advertised well in advance, and the PCC also ensures that he tells the public about the PCP meetings although formal advertising for these is the responsibility of the PCP.

There are some measurements that can be used, to ascertain interest in the role of PCC and to understand how well public accountability is working. Below are some figures on contact with the office and with the PCC:

Correspondence: Figures have grown significantly since the PCC began in office. Under the previous Police Authority, the office received only a small number of correspondences a week. Figures for the OPCC are at 4,600 (22/11/12 to 30/10/14), or around 50 per week.

Website: 30,000 visitors to our website each year. We average approx. 2,500 unique visits each month (3,500 total visits), which is usually a 50/50 split between new and returning users.

Public meetings and accountability

The PCC has held five Essex Police Challenge meetings so far, where the PCC challenges the Chief Constable, and members of the public are able also to ask their questions of the Chief and his team.

The PCC has held around 50 public meetings held since he was elected, in locations at the heart of local communities and in partnership with local policing teams and CSP managers to bring the public together with those most responsible for safety in the area.

iii. How are PCCs ensuring transparency in their decision making?

The Essex PCC publishes details of all decisions⁴ and expenses online. The PCC's commissioning intentions include a principle to ensure the voice of victims and their needs will be at the heart of decisions made about what services to commission and how they are provided. In developing and designing victims' services the OPCC has consulted with victims' representatives groups and victims themselves.

We have undertaken research projects which engaged with local victims and have held stakeholder conferences to understand the needs of victims. We have also published a series of regular e-bulletins to keep stakeholders up-to-date with developments around victims' commissioning. As part of the commissioning exercise for a Countywide Independent Domestic Violence Advisor (IDVA) service we involved service users as part of the evaluation mechanism to ensure the victim's voice had an opportunity to influence the decision making process.

² <http://www.essex.pcc.police.uk/2014/05/keeping-essex-safe-now-and-in-the-future/>

³ <http://www.college.police.uk/en/20972.htm>

⁴ <http://www.essex.pcc.police.uk/scrunity/gifts-and-hospitality/>

- iv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

The PCC website makes the following information available to the public:

Essex Police performance data⁵, which is published monthly and includes data and supporting information on Essex Police's performance against all eight areas of the Police and Crime Plan. This is supported by publication of notes of the Performance Scrutiny, and Resources Scrutiny meetings where performance is discussed with the force.

- v. What has worked best for PCCs in engaging with the public and local communities?

The PCC has adopted an Engagement Charter⁶, which sets out his commitment to the people of Essex around of all the ways in which he is available to the public. It also aims to capture his commitment to learning from the public so that he can better hold Essex Police to account on their behalf.

The PCC's approach is to ensure a flexible programme of engagement, providing all communities with the opportunity to participate fully in the debate and decision making around policing and safety policy and practice in the county. The Charter also covers ways in which the OPCC will consult and engage with the public.

- vi. How well are Police and Crime Panels able to hold a PCC to account between elections?

- a) Does the role of the PCP need further clarification?
b) How well are the current 'balanced' membership arrangements ensuring effective scrutiny and support of PCCs?

In Essex, the PCP receives regular performance reports from the PCC, with data and information on progress made against the Police Crime Plan. The PCP also requests thematic reports on themes such as Victims' Commissioning, Public Engagement, and Domestic Abuse etc. Through these reports, the PCP can hold the PCC to account on performance and any issues of concern. In summary, it is felt that the current arrangements are working effectively.

The PCP also receives any complaints made against the PCC or DPCC by members of the public and investigates them as appropriate. The OPCC will provide the PCP with information and briefings to facilitate the investigation of such complaints.

The role of the PCP is clear, however, the public understanding of it may not be as solid as it could be. Few members of the public attend the PCP meetings.

The PCP questions of the PCC in Essex come from all members of the panel.

- c) Are the current membership thresholds requiring a two thirds majority to veto a PCC's level of precept and appointment of a Chief Constable proving practicable?

In our experience, we note that these are proving practicable.

⁵ <http://www.essex.pcc.police.uk/scrutiny/essex-police-performance/>

⁶ <http://www.essex.pcc.police.uk/engaging-with-essex/>

- d) Should PCPs have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

The current arrangements, whereby those officers performing statutory roles (S151 and monitoring officer roles) are required to attend a confirmation hearing, are sufficient.

- e) How should PCCs be held to account for their standards of personal conduct? What role should PCPs have in this?

The PCC for Essex has adopted his Ethics and Integrity Framework, and expects that complaints made about his conduct would need to show he has not lived up to the standards in the framework (these include the seven principles of public life). The Essex PCP should consider such complaints in line with IPCC guidance, and recommend such action as the Panel deems fit.

- vii. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they need further clarification or guidance?

The PCC and OPCC are clear about the distinction of the two roles in all media, correspondence, information in relation to public meetings, and reports such as the PCC annual report. This is in order to be consistent and to ensure that the public are not misled as to what the PCC can and cannot do for them.

However, it is clear from some correspondence and complaints received by the OPCC, and from some media and press coverage, that there is still confusion from the public around the distinction between the PCC and CC. This is in part because the PCC role is still relatively new. However, further work is needed both locally and nationally to continue to clarify roles and responsibilities so the public are clear.

- viii. According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements'. How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

We have not experienced a conflict of interest with regard to having a joint Audit Committee. The joint audit committee arrangements work well for both PPC and CC. The chair of the Audit Committee, and committee members, provide an effective audit function across both corporation soles.

The PCC and CC each have a separate Chief Finance Officer. We do not think it appropriate for a member of staff to be accountable to two organisations; one of which holds the other to account.

- ix. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

In Essex, the development of the Ethics and Integrity Committee is an example of the PCC actively promoting ethical standards for himself and Essex Police. The Committee, which includes independent strategic advisors who act on a pro bono basis, works strategically to

help the PCC and Chief Constable understand what the future ethical challenges for the Essex Police service might be and provide advice and reflection on how they might address these challenges. The Committee has focused on a number of key themes to date such as abuse of power and use of force.

The PCC actively champions ethics and integrity in policing at a local and national level. A number of his recent blogs⁷ have addressed this issue.

- x. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

Part of the purpose of the Ethics and Integrity Committee is to include the work of the Policing Code of Ethics, however, the Committee does not have decision-making powers. In Essex Police, the Confidence Board is the board that oversees the embedding of the Code. One of the senior members of staff in the OPCC attends this Board and provides feedback to Essex Police on progress.

The Essex PCC and his Deputy have championed high professional standards. For example, the Essex PCC was the first PCC to publish the Professional Standards Department (PSD) Report⁸ on the outcomes of investigations into officers.

In Essex, the PCC has formed a strong view that over several years we have let our police down through inadequate governance that has led to often variable and sometimes poor standards of leadership. Both nationally and at the local level, Chief Constables have not been sufficiently rigorously challenged nor has there been the right form of support to enable police leadership, and the policing service that is shaped by that, to be as professional as it needs to be and as well informed by public expectations of the values and culture of our policing tradition.

The Essex PCC believes strongly that the election of Police and Crime Commissioners gives us an opportunity to restore full confidence in our policing through the effective challenge and support of our Chief Constables. His expectation is that the Essex Chief Constable will support his officers and staff as they exercise discretion, often in very difficult circumstances, and that when Essex police officers and staff do their best and act in accordance with their training, with integrity, and with compassion, they should expect and will receive support. His general view is however that police officers or staff must never exploit or abuse a position of trust with regard to a victim of crime with whom they come into contact. If and when they do, the PCC for Essex would always expect firm action to be taken by the Chief Constable.

- xi. Is there sufficient transparency of propriety information on expenses, registers of interest, gifts and hospitality and external meetings?

All information around these matters is published online⁹ and updated regularly.

⁷ <http://www.essex.pcc.police.uk/know-your-pcc/blog/> (for all blogs)

⁸ <http://www.essex.pcc.police.uk/conduct-and-professional-standards/> (for all PSD reports)

⁹ <http://www.essex.pcc.police.uk/scrunity/gifts-and-hospitality/>

- xii. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

Use of the seven principles of public life has proved useful in the experience of the Essex PCC, as these have helped form the Ethics and Integrity Framework, which underpins his and his Deputy's approach to identifying and resolving conflicts of interest. It has of course, also been important to ensure that that Constitution, Financial Regulations, Terms of Reference and other key governance protocols are in place, in order to ensure that mechanisms are available for managing matters in a transparent way.

Appendix One: Essex PCC Ethics and Integrity Framework

Introduction

Ethics and integrity lie at the heart of everything I do in my role as Police Crime Commissioner for Essex.

By ethics, I mean the values and behaviours which underpin all of my work and the work of Essex Police. By integrity, I mean ensuring that my office and Essex Police behave openly and honestly, so the public have confidence and trust in what we do.

In support of this, I have produced this document – my *Ethics and Integrity Framework*. The framework sets out:

- the standards and behaviours that the public can expect from me, my Deputy and my Office;
- how I am accountable to the public, and how the public can in turn hold me to account; and
- how I hold the Chief Constable to account in the important areas of standards, public life and public service.

Delivery of the framework is supported by my new Strategic Policing Board and its Ethics and Integrity Committee, which include 5 Independent Members ([here](#)), and by the new Police Code of Ethics ([here](#)).

Details on all of the above are set out below.

1) Standards and behaviours that the public can expect from me, my Deputy and my Office

Commitment to the Seven Principles of Public Life¹⁰

I am committed to the Seven Principles of Public Life (the 'Nolan Principles') as set out the Government's Ministerial Code. These are:

1. Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

I publish a register of gifts and hospitality (both accepted and declined) on my website. This is regularly updated by my office (the OPCC). You can find it [here](#).

2. Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

On appointment, I pledged to 'represent all sections of the community without fear of favour', including those most vulnerable groups. I am committed to transparency, ensuring that information and data is put in the public domain and published on my website. This

¹⁰ HM Government, *Ministerial Code*

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61402/ministerial-code-may-2010.pdf [accessed 04 August 2014]

includes ensuring that any disclosable interests are visible to the public. You can find those [here](#).

3. Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

All appointments to my office have been made following an open and transparent process. The OPCC has a Code of Conduct which highlights the responsibility for all OPCC members of staff to behave in an open, transparent and impartial manner. This includes the provision of impartial advice to me and to my Deputy. You can find the OPCC Code of Conduct at the link below.

[Essex OPCC Code of Conduct](#)

4. Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

As PCC, I am elected by and accountable to the public. My Deputy and I attend regular public meetings and engage directly with local communities, including under-represented and vulnerable groups.

I have set up a *Strategic Policing Board* ([here](#)), which is the first of its kind and includes five independent advisors. Two of the advisors also sit on the *Finance Committee* ([here](#)) which considers longer term strategic funding issues as well as the implications of current financial challenges. Three of the advisors sit on the *Ethics and Integrity Committee* ([here](#)), which works strategically to help both myself and the Chief Constable to understand and respond to the future ethical challenges for Essex Police.

The Strategic Policing Board and its committees each meet three times a year, with reports of the meetings published on my website. The boards provide guidance to me, but do not have formal decision making powers.

5. Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Decisions made by me are available [here](#), and comments I make about inspections reports by Her Majesty's Inspectorate of Constabulary (HMIC) are available [here](#). I also keep the public informed about how I how the Chief Constable to account and how Essex Police is performing in delivery of my Police and Crime Plan [here](#). I publish a quarterly performance report on matters pertaining to police professional standards [here](#).

On a regular basis, my office issues proactive press releases about my work, and I hold a range of engagement events throughout the county ([here](#)).

6. Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Any disclosable interests, both for me and my Deputy are made available to the public and can be found [here](#). Should any conflict or potential for conflict arise, I am committed to declaring it at the earliest opportunity and taking action to resolve it. My anti-fraud and corruption strategy highlights the importance of honesty for me, in my office, and in working practices ([here](#))

7. Leadership

Holders of public office should promote and support these principles by leadership and example.

I have ensured that details of remuneration for the Chief Constable are publicly available, as are the remuneration details for myself, my Deputy and members of my senior team ([here](#)).

I am committed to the honest and accurate recording of crime and performance data. I have given evidence to the Public Accounts Select Committee on the importance of this issue.

I have abolished all numerical targets across Essex Police and replaced them with one single target – to reduce crime.

2) How I am accountable to the public, and how the public can in turn hold me to account

I am elected by the people of Essex, and I am directly accountable to the electorate. I hold a number of public meetings, where the public can ask me about how I am performing, and how I am ensuring Essex Police deliver for the people of Essex.

The Police and Crime Panel, which comprises representatives from each district and unitary authorities, plus two independent members, is another mechanism by which I am accountable. The Panel's role includes reviewing the police and crime plan, annual report and both scrutinising and supporting the activities of me in holding the Chief Constable to account. The Panel has a number of powers and responsibilities. These include:

- The power to veto (by two-thirds majority) the proposed precept and the proposed candidate for Chief Constable.
- Reviewing the draft Police and Crime Plan and make recommendations to which I (as PCC) must have regard.
- Reviewing my Annual Report and make reports and recommendations at a public meeting, which I must attend.
- Asking Her Majesty's Inspector of Constabulary (HMIC) for a professional view, should I intend to dismiss the Chief Constable.
- Holding confirmation hearings for my proposed chief executive, chief finance officer and deputy police and crime commissioner appointments.

The Panel is required to hold a minimum of four public meetings a year. Papers can be accessed [here](#).

Ethics and Integrity Committee

I have established a new Ethics and Integrity Committee to provide advice and support to myself and the Chief Constable on matters relating to the ethics and integrity of policing in Essex. The Committee comprises of three Independent Advisors and will consider issues such as standards of behaviour, use of force, scrutiny of sanctions for misconduct etc.

The Committee's role is to advise and it has no decision-making powers. It will not and cannot scrutinise individual misconduct cases.

Scrutiny Programme

My office operates a thorough scrutiny programme, which analyses Essex Police service performance and financial performance on a monthly basis against a number of areas including:

- The eight areas of focus in my Police and Crime Plan ([here](#));
- Performance against a number of crime types and solved rates in each district and across Essex as a whole ([here](#)).
- Reports on areas within my Police and Crime Plan such as domestic abuse;
- Budgetary controls;
- Performance against the medium term financial plan; and
- Reports on areas within corporate support such as HR, IT and Estates.

Essex Police Challenge

I chair a quarterly public meeting, which aims to give members of the public the chance to raise any concerns about policing and crime in Essex. The Chief Constable Stephen Kavanagh provides the public with a countywide and then a local update on force performance, followed by open questions and answers from the audience and also from those who may have submitted questions in advance. The Challenge meetings form a crucial part of my role in scrutinising the work of police and holding the force to account.

PCC and CC meetings

I meet with the Chief Constable on a regular basis to discuss issues from the scrutiny programme, as well as to raise issues that the public have raised with me.

All information regarding meetings under the scrutiny programme can be found [here](#).

Transparency and accountability

This Framework sets out our approach to transparency and accountability. The OPCC has adopted a Code of Conduct which can be found [here](#), and publishes all information regarding meetings under the scrutiny programme [here](#). I also publish all expenditure over £500, which can be found [here](#).

Complaints

As PCC, I oversee Essex Police and have responsibility for ensuring that the police force is efficient, effective and fair. My office has a process for looking into complaints that are made, and where matters are not within my remit (e.g. those matters that are to do with operational policing); my office will pass these to Essex Police to respond. My Deputy undertakes dip sampling of complaints made to Essex Police ([here](#)). This is covered in more detail in section 3.

Allegations and Complaints against the PCC and the DPCC

Any complaints made against me and / or my Deputy, go to the Police and Crime Panel ([link](#)) for review and investigation.

3) How I hold the Chief Constable to account in the important areas of standards, public life and public service

Police Code of Ethics, and monitoring of implementation and impact

Essex Police are guided by the new Police Code of Ethics (add link). Supported by my office and by the work of the Ethics and Integrity Committee, I monitor how well Essex Police are delivering against the Code and, working with the Chief Constable, use this to help drive improvements. In addition, Her Majesty's Inspectorate of Constabulary (HMIC) now inspects all police forces against the Police Code of Ethics ([HMIC website](#)).

Out of Court Disposals

An out of court disposal is a community sanction, or a formal warning, or a fine that a member of the public who has committed an offence agrees to accept from the Police in preference to being charged with an offence and appearing before a court of law. There is a requirement for the victim to be consulted and their wishes determined before an out of court disposal decision is made.

Essex Police were amongst the first Forces to establish an out of court disposal panel to review all disposals determined by the Police. My Deputy chairs the Panel with membership of the panel including local magistrates, representatives from the voluntary and community sector etc. The Panel has no executive authority, but reviews cases and provides feedback to Essex Police around appropriateness of use of the sanction and review of the legality. Where the panel believes that the disposal was not appropriate they will submit a recommendation to Essex Police, accompanied by a request for a further review by an operational manager within the line management structure ([here](#)).

Monitoring of the Professional Standards Department, and of high professional standards

I am committed to ensuring that the highest possible professional standards are embedded across Essex Police. Where misconduct or errors of judgement do occur, I will ensure a fair and rigorous disciplinary process.

I publish a quarterly performance report on matters pertaining to police professional standards [here](#). My office also reviews and scrutinises the outcomes of police officer and police staff members' misconduct cases. My Deputy and my office also undertakes regular dip sampling of complaints made by the public and the outcomes reached by Essex Police, providing the appropriate level of scrutiny in this area.

Committee on Standards in Public Life

Local Policing – accountability, leadership and ethics

Response Form

Consultation Questions

The Committee has commenced an inquiry on the public accountability structures of the police. We are looking at the structures in place for ensuring ethical standards in the conduct and performance of Police and Crime Panels, Police and Crime Commissioners, and Chief Constables.

The Committee would like to hear your views. Please use this form to answer some or all of the questions in the Issues and Questions paper available at: https://whitehall-admin.production.alpha.gov.co.uk/government/uploads/system/uploads/attachment_data/file/360941/Police_Accountability_Structures_-_Issues_and_Questions_Paper.pdf

How to respond

Completed response forms should be sent by email to public@standards.gsi.gov.uk or by post to the Secretary to the Committee on Standards in Public Life GC05 1 Horse Guards Road, London SW1A 2HQ.

Name: Colin Ismay
Contact address: Essex County Council PO Box 11, County Hall
Chelmsford
Postcode: CM1 1LX
Contact Telephone: 033301 34571
E-mail: colin.ismay@essex.gov.uk

Please tick the appropriate response:

- Are you responding:
- *as a member of the public*
 - *as a member of the police*
 - *on behalf of another organisation*

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>

If you are responding on behalf of an organisation, please tell us your area of work, e.g. police constabulary, regulator, trade union, think tank etc

Essex Police and Crime Panel

Local Policing – accountability, leadership and ethics

Current Accountability Structures

Consultation Questions

Question 1:

Are there any gaps in the existing mechanisms for holding PCCs to account?

Comments

As an elected official ultimately PCCs are accountable to the electorate who have the opportunity to make their views known once every four years.

In respect of conduct and standards issues, the Independent Police Complaints Commission has clear mechanisms for investigating allegations of criminal behaviour. For conduct and standards issues that do not involve allegations of criminal behaviour, the statutory role lies with police and crime panels. However, that role suggests more can be done to hold PCCs to account than can realistically be achieved. Panel's powers are limited: they cannot investigate complaints, can only seek an informal resolution and have no power to impose sanctions. Under these circumstances it would almost be better if Panels had no role to play in holding the Commissioner to account for conduct or standards issues. The alternative would require more resources to be made available for panels to have a meaningful role.

The situation in South Yorkshire has demonstrated what was known already, namely, just how difficult it is to compel an elected official to resign if they are not minded to do so, however compelling the case might be. Even so it is questionable whether a panel comprised largely of elected members should have the power to call for the resignation of another elected official.

Question 2:

What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

Comments

PCCs are statutorily required to publish a record of decisions taken that are of "significant public interest" without there being a definition of what constitutes "significant public interest". So whilst some decisions are published once they have been taken there is no requirement to identify future decisions on a forward plan as there is for local government. Consideration could be given to amending the Elected Local Policing Bodies (Specific Information) Regulations 2011 to cover these points.

Question 3:

How are PCCs ensuring transparency in their decision making?

Comments

As a minimum decisions and declarations of interest are published on the Commissioner's website. See also the answer to question 2.

Question 4:

What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

Comments

In Essex the Commissioner includes a large amount of information about how he holds the Chief Constable to account on his website. Additionally, quarterly police challenge meetings are held in public in different locations around the County. The police and crime panels are intended to offer an additional layer of transparency and scrutiny. The Essex Panel worked with the Commissioner to develop performance criteria for reporting on performance against the Police and Crime Plan on a regular basis to the Panel. The reports are in the public domain and the meetings when the reports are discussed are held in public. The Panel has the opportunity to challenge the reliability of the information.

The Commissioner also produces an Annual Report which provides a shorter, more focused summary of progress made in 2013/14, including achievements and challenges. It provides an accessible, public facing summary of delivery against the Police and Crime Plan, and a summary of the annual accounts. The look and feel of this year's Annual Report has been changed to make it more accessible and engaging to the public. The Panel commended the Commissioner on the clarity of the Report.

There is also information available from HMIC which is looking to improve the clarity of its findings.

Issues concerning local policing, with the opportunity for local people to comment on the performance of their local police, were discussed at Neighbourhood Action Partnerships but these have been removed to allow the Police to run their own local meetings. The Panel regrets the loss of the Neighbourhood Action Partnerships and has concerns over the ability of the Police to manage local meetings. These concerns have been clearly expressed to the Commissioner and passed on by him to the Chief Constable. The Panel will be keeping this matter under review.

Question 5:

What has worked best for PCCs in engaging with the public and local communities?

Comments

It is difficult for the Panel to comment on this although in Essex the Commissioner has made a real effort to engage with the public via an on-going series of regular public meetings held around the County.

Question 6:

How well are Police and Crime Panels able to hold a PCC to account between elections?

Comments

Experience on this seems to differ widely across the Country and depends to a large extent on the Commissioners themselves and on the relationship between the Commissioner and the panel. Some panels have had to adapt and respond to difficult and challenging events surrounding the Commissioner. The Essex Panel has a very good relationship with the Commissioner and is able to fulfill the statutory requirements of the role.

The Government's expectation was that panels would provide light touch scrutiny and funded accordingly. Increasingly, it is difficult for panels to have a meaningful role on that basis and therefore they are looking to increase their involvement.

The success of panels appears to depend too much on relationships between individuals rather than all concerned working to common aims and expectations.

Question 6a:

Does the role of the Police and Crime Panel need any further clarification?

Comments

The role does need further clarification: at a National level there needs to be greater acceptance and co-operation from Commissioners of what the role entails; and an acknowledgement of the artificiality of not being able to get involved to a degree with operational issues in order to be able to judge the Commissioner's effectiveness in holding the Chief Constable to account. The wide variety of experience across the Country suggests that greater clarity is needed to achieve better consistency nationally.

Question 6b:

How well are the current “balanced”¹ membership arrangements ensuring effective scrutiny and support of PCCs?

Comments

In Essex the political mix of the Panel and the inclusion of independent members have ensured that the Commissioner receives a range of views and objective criticism from the Panel when scrutinising and supporting his role.

Question 6c:

Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of a Chief Constable proving practicable?

Comments

A two-thirds majority of the membership of a panel is a sizable figure to achieve in order to veto the precept. Whilst there has been some opposition to the Commissioner’s proposals in Essex the numbers involved have not come anywhere near a two thirds majority to achieve a veto. On the other hand it is acknowledged that such decisions should not be taken lightly and so there should be a degree of difficulty involved.

Having said that, where a two-thirds majority is achieved in vetoing the precept the Commissioner need only set a revised precept that differs by a penny in response. This seriously weakens the effectiveness of the veto as a tool for holding the Commissioner to account.

Question 6d:

Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

Comments

¹ Schedule 6 paragraph 31 PRSRA sets out the duty to provide a balanced panel. The “balanced appointment objective” referred to in this paragraph is the objective that local authority members of a police and crime panel (when taken together)—

(a) represent all parts of the relevant police area;

(b) represent the political make-up of—

(i) the relevant local authority, or

(ii) the relevant local authorities (when taken together);

(c) have the skills, knowledge and experience necessary for the police and crime panel to discharge its functions effectively.

Yes.

Question 6e:

How should PCCs be held to account for their standards of personal conduct?
What role should Police and Crime Panels have in this?

Comments

Please see the answer to question 1.

Question 7:

Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

Comments

It is difficult for the Panel to respond to this.

Question 8:

According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.' How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

Comments

It is difficult for the Panel to respond to this.

Ethical Leadership

Consultation Questions

Question 9:

What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

Comments

Ethics and integrity should be woven seamlessly into everything the Commissioner and the Police Force does, combined with transparency to ensure public confidence.

The Essex Commissioner has published an “Ethics and Integrity Framework”. The framework sets out:

- the standards and behaviours that the public can expect from him, his Deputy and his Office;
- how he is accountable to the public, and how the public can in turn hold him to account; and
- how he holds the Chief Constable to account in the important areas of standards, public life and public service.

Delivery of the framework is supported by his new Strategic Policing Board and its Ethics and Integrity Committee, which include 5 Independent Members and by the new Police Code of Ethics.

He has declared his commitment to the ‘Nolan Principles’.

This is evidence of managing responsibilities well.

Going beyond this, commissioners need to match words to deeds.

Question 10:

What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other

pressures on the force? How are any obstacles being overcome?

Comments

The Commissioner sets out on his website how he holds the Chief Constable to account in the areas of standards, public life and public service.

Essex Police are guided by the new Police Code of Ethics. Supported by his Office and by the work of the Ethics and Integrity Committee, he monitors how well Essex Police are delivering against the Code and, working with the Chief Constable, uses this to help drive improvements. In addition, Her Majesty's Inspectorate of Constabulary (HMIC) now inspects all police forces against the Police Code of Ethics.

Essex Police were amongst the first Forces to establish an out of court disposal panel to review all disposals determined by the Police. The Deputy Commissioner chairs the Panel with membership of the panel including local magistrates, representatives from the voluntary and community sector etc. The Panel has no executive authority, but reviews cases and provides feedback to Essex Police around appropriateness of use of the sanction and review of the legality. Where the panel believes that the disposal was not appropriate they will submit a recommendation to Essex Police, accompanied by a request for a further review by an operational manager within the line management structure.

The Commissioner is committed to ensuring that the highest possible professional standards are embedded across Essex Police. Where misconduct or errors of judgement do occur, he will ensure a fair and rigorous disciplinary process.

He publishes a quarterly performance report on matters pertaining to police professional standards. His Office also reviews and scrutinises the outcomes of police officer and police staff members' misconduct cases. The Deputy Commissioner and the Commissioner's Office also undertake regular dip sampling of complaints made by the public and the outcomes reached by Essex Police.

Question 11:

Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

Comments

The Essex Commissioner publishes the information on his web site.

Question 12:

What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

Comments

It is difficult for the Panel to comment on this

Submission to Committee for Standards in Public Life Inquiry into Police Accountability Structures – Issues and Questions Paper

Professor Francesca Gains (University of Manchester) and Professor Vivien Lowndes (University of Nottingham)

This submission is based upon our research¹ into the institutional arrangements supporting the development of the Police and Crime Commissioner (PCC) role. Our enquiries to date identify many strengths deriving from the involvement of a directly elected official in the landscape of policing governance. We have seen evidence of innovation in how commissioners have engaged with the public and set policing priorities².

We have also noted weaknesses in the current governance arrangements. We would like to contribute to the work of the Committee by flagging three issues highlighted through our research in respect of: variability of the information available on line; the way in which commissioners exercise their equalities duties, and the composition of police and crime panels. These interrelated issues speak to the Committee's questions about accountability, transparency, public engagement and scrutiny.

Qiii. How are PCCs ensuring transparency in their decision making?

At the start of our research we noted the guidance provided by the Home Office to incoming PCCs about the transparency and reporting arrangements expected which stressed that PCCs should be making information available on the internet³. However in our analysis of PCC websites in the first two years of operation we have noted inadequate and patchy provision of information. There are significant gaps in the information available to the public, Police and Crime Panels (PCPs) and those seeking comparison across PCC arrangements about the commissioners' activities, accessibility and decisions. For example we noted:

- In the first year of operation not all *forward plans* were available on line although these were available in all areas in the second year;

¹ A four year research project on the changing institutional arrangements associated with the election of Police and Crime Commissioners being undertaken by the authors, supported by the '[Understanding Institutional Change – A Gender Perspective](#)' programme, funded by the European Research Council.

² Gains F and Lowndes, V 2014 <http://blog.policy.manchester.ac.uk/featured/2014/12/police-and-crime-commissioners-lessons-for-devolution/>; Gains, F and Lowndes, V 2014 'How is Institutional Formation Gendered, and Does it Make a Difference? A New Conceptual Framework and a Case Study of Police and Crime Commissioners in England and Wales', *Politics and Gender* 10 (4) pp 524-548

³ Home Office '*Have you got what it takes to be transparent*' available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/117467/to-be-transparent.pdf accessed November 2014; Home Office, '*Publishing Information in a Transparent Way*' available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/143836/publishing-information.pdf accessed November 2014.

- Information about the existence or timing of *public meetings* was not available in 10 areas in the first year of operation and 6 of the 41 areas in the second year of operation;
- *Minutes* or notes of public meetings were only available in 10 areas in the first year and still only 15 areas in the second year;
- *Online question* to PCCs were possible in 11 areas in the first year and fell to just 7 of the 41 areas in the second year;
- *Online consultation* was offered as PCCs developed their first Police and Crime Plans in 26 of the 41 areas but only 5 of the areas provided information on who was consulted;
- *Budgetary information* available was so variable that it was impossible to garner any kind of comparator indicators;
- *Website links to the PCPs* were only available in 16 of the 41 areas in the first year and in the second year 4 websites still did not have a link to panels.

This lack of transparency creates accountability gaps hindering public engagement and scrutiny.

Qiv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

Our research suggests that there is variability in the way commissioners have adopted and oversee Equalities Duties. As a public body Police and Crime Commissioners are subject to the Public Sector Equality Duty which requires that fairness is at the heart of public bodies work and that public services meet the needs of different groups. The Association of Police and Crime Commissioners (APCC) provided guidance on how individual PCCs could seek to meet these duties⁴. This guidance states that to fulfil this duty, and as part of the arrangements for transparency and accountability, PCCs must make available details of their office staffing including data about equalities. The APCC guidance also suggests that PCCs should oversee the work of their chief constables in meeting chief constables' more specific equalities duties (to publish equalities information, demonstrate that they have considered equalities implications when making decisions and formulating policies and practices and publish equality objectives). Further that PCCs must explain to the Police and Crime Panel through their Annual Report how they are meeting their general equality duty.

Our online analysis of the way in which PCCs addressed their equalities duties suggested great variation. In the first year of operation just under half of PCCs (44%) mentioned their responsibilities under the Equalities Act in their Police and Crime Plan. Only one in five, (20%), of PCCs list having an equalities policy adviser as part of their staffing arrangements.

⁴ Association of Police and Crime Commissioners, 2012b Police and Crime Commissioners: Equality, Diversity and Human Rights, 16 October 2012, London, APCC

And only just over a third, (36%) of PCCs specifically reported on the incidence of, or performance of the police in relation to, violence against women or girls in their annual report. Tackling violence against women and girls was identified as a policy area for which the Home Secretary hoped commissioners would play a key role⁵. It is a policy area which has obvious gender dimensions of relevance to equalities duties and where consideration of crime statistics is a key mechanism of scrutiny⁶.

By the second year of operation we found a greater number of commissioners mentioned their equalities duties in their second year plans (73%) however 11 of the 41 commissioners did not mention these duties. Fewer commissioners (15%) list an equalities adviser as part of their staffing and just over half of commissioners (56%) reported on the incidence or performance of the police in relation to violence against women and girls. So in the second year of operation these indicators suggest stronger adoption of equalities duties but still a very variable performance.

Our research used these indicators to calculate whether making more extensive use of equalities powers was linked to prioritising tackling violence against women and children in commissioners' police and crime plans. We found that where commissioners had adopted equalities duties more extensively, they were 2.7 times more likely to prioritise violence against women and girls in their plan compared to those commissioners who made minimal use of their duties.

In relation to the evidence set out in response to Qiii and Qiv above we would like to see some guidelines for what information commissioners are expected to make available and in what format. We suggest this would improve the transparency, accountability and scrutiny of individual commissioner's work by the public and PCPs, and for those seeking evaluate the work of commissioners more generally.

Qvi a. How well are the current 'balanced' membership arrangements [of PCPs] ensuring effective scrutiny and support of PCCs?

The current balanced arrangements for the composition of police and crime panels aim to ensure geographic and partisan balance. However we note that what is lost from the arrangements governing composition of police committees, to the criteria for composition of the PCPs, is ensuring diversity in the make-up of the panel. We are concerned that panels may become unrepresentative in other ways of the populations they serve.

⁵ Home Office, 2012 Call to End Violence Against Women and Girls: the next chapter, available from <https://www.gov.uk/government/publications/call-to-end-violence-against-women-and-girls-taking-action-the-next-chapter> accessed November 2014

⁶ Home Office, 2013 Briefing on Ending Violence Against Women and Girls, pp 9, available from <https://www.gov.uk/government/publications/briefing-on-ending-violence-against-women-and-girls>

Our analysis shows in the first year of operation that 28% of all PCP panellists were women. Over half of the panels had less than this average percentage of women panellists. In the second year overall the proportion of panellists who were female had risen to 33% but still over half the panels (22 of the 41 panels) had fewer than one third female membership. We did not seek to identify BME membership from websites but would suggest that ensuring BME representation is also important. We suggest that the balanced criteria should be widened to include diversity criteria to ensure scrutiny of PCCs' work takes account of all the communities they serve.

[Professor Francesca Gains](#) co-ordinated a five year project (2002 – 2007) for the Department of Communities and Local Government to evaluate the introduction of new council constitutions in local government. She has conducted research for the Centre for Public Scrutiny into the introduction of health scrutiny, the Standards Board for England, the Lyons Commission on the Future of Local Government and the Roberts Review into the Future of Councillors.

[Professor Vivien Lowndes](#) has undertaken research and policy advice for Department of Communities and Local Government, the Council of Europe, the Audit Commission, Joseph Rowntree Foundation, and numerous local authorities and local partnerships. She was specialist advisor to the Public Administration Select Committee's enquiry into citizen participation, and was also an advisor to the Lyons Commission on The Future of Local Government.



Mr. Paul Bew
Chair
Committee on Standards in Public Life
Room GC.05
5 1 Horse Guards Road
London
SW1A 2HQ

Please ask Mr. Paul Trott
for:
Our Ref: OPCC/G2262
Your Ref:
Direct Dial: (01452) 752273
Email: chiefexecopcc@gloucestershire.police.uk
Date: 30 November 2014

By email only to:
public@standards.gsi.gov.uk

Dear Sir,

RE: Local Policing - accountability, leadership and ethics

Thank you for your letter of 7 October concerning the above addressed to Mr Martin Surl, Police and Crime Commissioner for Gloucestershire. Having consulted with Mr Surl and staff colleagues, I have been asked to respond to the issues raised in your paper on his behalf.

Effectiveness of the current structures

i. Are there any gaps in the existing mechanisms for holding PCCs to account?

It must be remembered that it is fundamental to the role of PCC that he/she is primarily accountable to the local electorate and population. This is not just through the periodic elections but through daily correspondence with individuals and organisations and via the local press who are not slow to challenge the PCC's decisions and initiatives and any perceived inaction on his/her part. It is this direct accountability that is the most significant contrast between the current regime and the former police authorities which did not enjoy anything like the public profile within the force area and beyond that the PCC does. It has been said that the low turnout at the initial elections indicated a lack of interest/understanding on the part of the electorate. That is likely to change once PCC elections are timed to coincide with other elections. However there is a concern that independent candidates for the role will not enjoy the same financial and human support that party political candidates will have which will therefore require rules to be enacted to ensure parity of funding between all candidates and the avoidance of parties giving covert support to their candidate under cover of their other election literature and publicity.

ii. What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

The PCC for Gloucestershire has been subjected to considerable public accountability through a number of formal and informal methods. He has invested in a mobile display

vehicle (known as the Neighbourhood Engagement Vehicle) which is used by the PCC and his staff to engage in face to face dialogue with local people over a range of issues. He has recently relaunched his website to make it more accessible and engaging and regularly issues press releases whenever significant decisions are made in an attempt to prompt questions and requests for information from the public. In fact he has a policy of never refusing a response to an enquiry from the media. The PCC has also used webcasts to publicise significant issues and decisions (e.g. concerning the decision to build a new custody centre and when debating the Constabulary's approach to the pilot badger cull). The promotion of the PCC's Police and Crime Plan and his innovative approach of appointing people from outside the police service to lead on particular initiatives, e.g. the Chief Fire Officer leads on the area of "safe and social driving", also helps to encourage engagement on the part of the public. The PCC is convinced that he is at least as effective, if not more so, in engaging with local people as other public figures in the county, such as local authority leaders and MPs.

iii. How are PCCs ensuring transparency in their decision making?

As explained above, the PCC makes use of his website to publish the statutory information he is required to share, as well as additional information and developments in connection with the Police and Crime Plan. He has also used webcasts to engage with the public concerning important issues, issues regular press releases, publicised through social media, and conducts ongoing consultation exercises with local communities.

iv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

In addition to the new website and the statutory information published there, the PCC has his own publication scheme (in addition to the Constabulary's) and regularly responds to a range of FOI and other requests for information. Particular care is taken to ensure good use is made of the allocated space in the annual Council Tax leaflet (in fact additional space has been purchased) and references are regularly made to national sources of local information such as www.police.co.uk, and the HMIC's and the British Crime Survey's websites. There is no purpose to be served by replicating information that is already available elsewhere.

v. What has worked best for PCCs in engaging with the public and local communities?

The webcast concerning the pilot badger cull received more than 1000 hits and was probably the subject that has generated most responses from the public. The Neighbourhood Engagement Vehicle has generated good contact with the public especially in the smaller market towns. The PCC regularly personally attends a range of community groups and meetings across the county, including business sector groups and partnership meetings and, having no deputy, is represented by members of his staff at many others. The creation of a Commissioner's Fund has enabled the Commissioner to support 105 different community groups around the county who are shown to be working in support of the Police and Crime Plan. The possibility of a grant encourages engagement from a range of groups that would not normally expect to work with the police.

vi. How well are Police and Crime Panels able to hold a PCC to account between elections?

a. Does the role of the Police and Crime Panel need any further clarification?

The role of the Police and Crime Panel is well defined but poorly understood, its role as a scrutiny body being somewhat different to a conventional local authority committee. It would however be appropriate for panels to be given the power to investigate and determine less serious criticisms of the PCC without having to involve national agencies such as the IPCC or the HMIs.

b. How well are the current "balanced" membership arrangements ensuring effective scrutiny and support of PCCs?

Since panel members are selected to represent the police area geographically and by reference to the local authorities within that area, there is limited opportunity for members' selection to reflect the range of skills, knowledge and experience required to form an effective panel. Greater diversity of the panel in terms of gender, ethnicity, age and life experiences would be most beneficial to the role of the Panel since there is currently a risk that panels could tend to focus more on minor crime and disorder at ward level and members may, by virtue of their local electoral mandate, tend to pursue their own local interests and political concerns.

c. Are the current membership thresholds requiring a two thirds majority to veto a PCC's level of precept and appointment of a Chief Constable proving practicable?

In view of the absence of a true democratic mandate on the part of the Panel, the requirement of a two-thirds majority for such matters is a necessary democratic safeguard.

d. Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

No. The appointment of senior staff is intrinsic to the leadership of any team. The PCC cannot be held to account for the manner in which he has performed his role if he cannot select his own senior team. The law, supported by internal policies and governance frameworks, together with the scrutiny of the local media, already ensures that PCCs cannot behave in a totally cavalier fashion in this regard. The outcry that followed certain ill-advised appointments in other parts of the country demonstrates the effectiveness of existing arrangements. Such appointments would not have been prevented by prior scrutiny by local politicians.

e. How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

PCCs have already committed themselves to the Nolan Principles and have a duty to act and behave ethically within their Governance Frameworks against which they are readily scrutinised by the local media. At the time of election the PCC for Gloucestershire, as an independent candidate, also committed himself to the "Martin Bell Principles" and subsequently to the principles set out in the Leveson Report. By virtue of operating within the police service, PCCs are susceptible to challenge by officers and staff of the police

force (who are not their employees) as well as their own staff and Monitoring Officer who is obliged to report the more serious allegations to the Police and Crime Panel. Most, if not all, forces have whistleblowing policies which are readily enforced. Once such allegations become public PCCs are of course susceptible to public censure and the censure of the Police and Crime Panel. It would be helpful if Police and Crime Panels saw themselves as having a role in mediating between the PCC and aggrieved members of the public rather taking on the role of critics and disciplinary bodies.

vii. Are the boundaries between the local roles and responsibilities of the PCC and the Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

It is patently obvious that the majority of the public have not yet grasped the different roles of the PCC and the Chief Constable. The PCC's office regularly has to explain to correspondents the extent of the PCC's remit and the considerable operational independence of the Chief Constable. There is therefore a need for further clarification of the two roles but communicating this to the general public will be a real challenge.

viii. According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.' How well is this working in practice? Are there any examples of conflict of interests arising from PCCs and Chief Constables having in some cases a joint audit committee and/or a joint chief financial officer?

Our (joint) Audit Committee is most effective in advising and challenging the Constabulary as a whole, comprising, as it does, three experienced members with complementary skills. It is noticeable that they enjoy a significant level of interaction with the PCC and the Chief Constable. Since the accounts are required to be consolidated, it is essential that one committee oversees both the PCC and the Chief Constable's financial systems and accounting records and procedures and receives reports from the internal and external auditors. To require separate committees would result in significant duplication and unnecessary cost. No conflicts of interest have been identified. We currently have separate CFOs for the PCC and the Chief Constable. However, in a time of austerity, it is appropriate to give serious consideration to combining the roles since the advantages of having one person with responsibility and knowledge of the entire financial system would seem likely to outweigh any theoretical concerns about conflicts of interest.

Ethical Leadership

ix. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or if not, suggest what can be improved?

PCCs, along with the police service generally, are still developing the place of ethics within the wider organisation. While PCCs are clearly responsible for the ethics of their own decisions and conduct, it is for the Chief Constable as the leader of the police force to set the ethical standards of the organisation. The role of the PCC is to hold the Chief Constable to account and that includes holding him/her to account for the ethical integrity of his/her actions and decisions. The Code of Ethics helps by setting a benchmark against which individuals can be held to account. It is however far from well understood at this

time and would benefit from further development and real life examples of its application in practice. In this police area, the PCC has used ethical considerations to challenge the policing of the pilot badger cull which divided the local community. By focusing on the ethics of the problem, the force was encouraged to emphasise its independence and its role in 'keeping the peace' and avoiding appearing to 'take sides' in such a contentious issue.

x. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

Following his election the PCC committed himself to a joint statement with the Chief Constable concerning the ethical and other values that would underpin their relationship and the manner in which they would work, especially in relation to decision making and the manner in which resources were used and shared. This joint statement is now being reviewed and updated following changes in the force's structure and leadership. Following the publication and adoption of the Policing Code of Ethics, the PCC for Gloucestershire is currently planning to establish an Ethics Panel to advise him and the force on the application of the Code and wider ethical issues as they apply in the policing context.

xi. Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

The Commissioner fully complies with the statutory requirement to publish the prescribed information which is consistent with his commitment to the Nolan and Bell Principles. Working with the force's Professional Standards Department and the Audit Committee, the PCC is encouraging greater transparency and commitment to openness, subject to operational constraints.

xii. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

Again, in this force, the Joint Statement has been particularly valuable in localising the Seven Principles and applying them to the particular circumstances in the local situation. Conflicts of interest between personal and public duties are managed by a culture of challenge and an expectation that personal interests will take second place to the public role. One conflict that we have not experienced is that between the PCC's public duties and party loyalties and pressures, since our PCC is an Independent. There is something to be said, in view of the size and diversity of police areas, that upon election, PCCs should surrender their membership of any political party and commit themselves to serving the entire population of the police area, free from the pressures that membership of a political party may bring and appear to have been a factor in other areas.

In essence, the accountability of PCCs is considerably greater than it ever was under the former arrangements and it is continuing to develop in the right direction. The incidents that have prompted your enquiry demonstrated the level of scrutiny to which PCCs are subject

and although there may have been no formal process for removing particular individuals from the role, it is commonly believed that it would have taken much longer and cost a lot more if a more formal process had been established with all the safeguards and procedures that that would require.

I trust these comments will be of assistance to you and your committee in their deliberations.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Paul D. Trott", with a horizontal line underneath it.

Paul D. Trott,
Chief Executive

Gloucestershire Police and Crime Panel –

Response to Committee on Standards in Public Life consultation on Local Policing – accountability, leadership and ethics.

1. BACKGROUND

Lead Members from Gloucestershire Police and Crime Panel met to discuss comments from the Panel to the consultation. The lead members are a cross party group of members who set the agendas and agree the direction of the Panel's work.

2. RESPONSE

The members considered the LGA response and welcomed many of the elements within their response. Rather than respond to the questions individually, members wished to make a general statement as to how they felt about the currently public accountability structures.

2.1 Clarity on roles

Members recognise that many Panel members are still looking to understand their role and how they fit within the wider police accountability. For those members previously on the Police Authority, there is a period of adjustment needed to understand that the Panel fulfils a very different role. The temptation is to stray into operational policing matters and hold the police to account. It is important to develop a strong relationship with the Commissioner's Office to ensure that this blurring of the boundaries can be navigated successfully and that the experience of members can be utilised positively by the Commissioner.

2.2 Concerns around perception of policing nationally

Members acknowledged that discussions around public accountability are being carried out against a backdrop of concerns around how the Police are viewed among the wider public. Some members questioned the Commissioner's role in ensuring that the behaviour of the police is monitored, while also recognising the role of the IPCC.

2.3 Complaints process

There have been questions around whether there needed to be a strengthening of the checks and balances available to the panel. One area which has been identified as requiring clarity is with regards to the complaints

process. Without formal sanctions the panel have very little to add when complaints have been unable to be resolved at a local level.

One member has expressed concerns that HM Inspectorate of Police has not included the Police and Crime Panel in its recent observations. It was felt that it was essential that the Inspectorate should regard the panels as part of the overall structure of provision, delivery and monitoring. If they were to do this, it would immediately afford an additional element of authority and influence that the Panel could then add to their armoury.

3. MOVING FORWARD

Members felt that if a decision is made that Police and Crime Panels are to be developed further, there is much within the current structure still to be utilised.

- Pre decision scrutiny – Members would welcome greater involvement in the initial stages of decisions made by the Commissioner. Panels can provide a wealth of experience and knowledge for the Commissioner to utilise. There is nothing within existing structures that prevents this from happening, but it is dependent upon a strong relationship between the Panel and the Commissioner.
- Building relationships – If panels are to use their powers of influence then it requires a shift away from some of the tensions that currently effect panels' ability to carry out their role. Relationships take time to develop and panels need to work to build up trust with the Commissioner to ensure that their challenge is seen as being from a 'critical friend' and not as a nuisance.
- Alternative models? – Members recognise the previous Police Authority model and the ambition for change that led to a Police and Crime Commissioner model. Members also recognise the Fire Authority model currently in existence.

Secretary to the Committee on Standards in Public Life
GC05
1 Horse Guards Road
London
SW1A 2HQ.

23rd October 2014

Local Policing – Accountability, Leadership and Ethics. Issues and Questions paper.

Dear Sir,

I am pleased to attach my response, as an individual, to the above consultation paper.

Question i. Are there any gaps in the existing mechanisms for holding PCCs to account?

I have carefully read through this consultation paper and of the many issues raised one in particular seems worthy of consideration. In paragraph 13 it is stated that “Her Majesty’s Inspectorate of Constabulary (HMIC) which continues to be responsible for inspecting the efficiency and effectiveness of police forces and previously had responsibility for inspecting police authorities, has no such jurisdiction in relation to PCCs.” I wonder if it would be helpful if the HMIC (an independent public body) did have jurisdiction in relation to PCC’s.

Question ii. What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

Please see my response to Question iv. The opportunity of the existing mail-out to households could be grasped by including additional information. Ideally, the additional information could contain appropriate comparative analysis of the type referred to in paragraph 12, 1st sentence.

Question iii. How are PCCs ensuring transparency in their decision making?

No comment.

Question iv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

In the Spring each year details of the coming years Council Tax Bill are sent to households. The documentation includes useful, but brief, information about the County and Borough councils, as well as the Police & Crime Commissioner.

Question v. What has worked best for PCCs in engaging with the public and local communities?

The Surrey PCC was a speaker at a lively debate on Restorative Justice in Woking in January 2014.

Question vi. How well are Police and Crime Panels able to hold a PCC to account between elections?

a. Does the role of the Police and Crime Panel need any further clarification?

No comment.

b. How well are the current “balanced” membership arrangements ensuring effective scrutiny and support of PCCs?

I do not have comments about this. However, I agree (as set out in paragraph 21 of the consultation paper) that it is appropriate the membership arrangements should be “politically balanced”.

c. Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of a Chief Constable proving practicable?

No comment.

d. Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

Yes.

e. How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

Giving the HMIC jurisdiction over PCC’s may not directly impact on the issues of personal conduct. However, there could be some indirect impact.

Question vii. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

First Question - This is hard to say. The Committee on Public Standards in Public Life could commission an opinion poll to try and assess this.

Second Question - The results of such an opinion poll could clarify the position.

Question viii. According to the Financial Management Code, Audit Committees should ‘advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.’ How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

First Question - No comment.

Second Question - I do not have examples. However, I can see why it could make sense (e.g. to cut down on bureaucracy) to have a joint audit committee. I am not so sure how helpful it is to have a joint chief financial officer.

Question ix. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

I have nothing to add to paragraphs 26 to 29.

Question x. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

First Question - Paragraph 28 states that Chief Constables must have regard to the College of Policing “Code of Ethics”. It would seem straightforward for both PCC’s and Chief Constables to be working on a common code of ethics, rather than using different ethical codes.

Second & Third Questions – No comment.

Question xi. Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

I agree that, as stated in paragraph 30, (2nd sentence) it would be helpful to have a national register of PCC’s disclosable interests. Similarly, national guidance could be provided in respect of significant meetings / hospitality that is of relevance to lobbying.

Question xii. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

First Question - No comment.

Second Question - So that it is not necessary for each PCC to “reinvent the wheel” national guidance could be prepared on such matters, which PCC’s could opt into where appropriate.

Yours faithfully



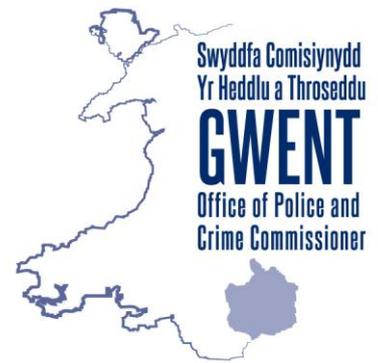
Swyddfa Comisiynydd yr Heddlu a Throseddu, Gwent
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Comisiynydd yr Heddlu a Throseddu ar gyfer Gwent | Police and Crime Commissioner for Gwent:
Ian Johnston QPM

Lord Bew
Committee on Standards in Public Life
Room GC.05
1 Horse Guards Road
LONDON
SW1A 2HQ

19th November, 2014

Dear Lord Bew,

Local Policing - accountability, leadership and ethics

I am writing in response to your letter of the 7th October, 2014 with regard to the inquiry the Committee is undertaking into accountability in police governance from a standards point of view.

Please find attached my response to the questions within the issues paper. If you require any further information or clarity, please let me know.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian Johnston', with a horizontal line underneath.

Ian Johnston QPM
Police and Crime Commissioner for Gwent

Question	Answer
<p>i. Are there any gaps in the existing mechanisms for holding PCCs to account?</p>	<p>One element that could be improved is public awareness of the role of the PCC. Although much work is done locally to address this, it would be useful to see more awareness raising done nationally.</p> <p>In Gwent, we have a very proactive Police and Crime Panel and I have developed a very good relationship with the members who call for relevant items to be debated and scrutinised to a high standard. Panel members have observed the shortlisting process for grant giving from the Partnership Fund and the Chief Constable appointment process. I believe that the mechanism itself satisfactory. However that is the dependent on skills, knowledge and understanding of individual panel members</p>
<p>ii. What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practise?</p>	<p>In Gwent, I have taken a completely open approach to publicising decision making. We publish all decisions (although some confidential details are removed) on the website. All of our decisions are sent weekly to MPs and AMs, Police and Crime Panel members and the media.</p> <p>www.gwent.pcc.police.uk</p>
<p>iii. How are PCCs ensuring transparency in their decision making?</p>	<p>I ensure transparency through public decision making meetings (quarterly), publishing as much information as possible to the website, social media and pre-decision consultation via surveys and meetings.</p>
<p>iv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?</p>	<p>We publish agendas, minutes, reports and decision logs. Performance reports are also on the website.</p> <p>We are working on the publication of performance information in a way that is user friendly and best suits our communities and consulting on priority and decision area.</p>
<p>v. What has worked best for PCCs in engaging with the public and local communities?</p>	<p>The following have all been useful engagement tools: public surgeries, surveys, links with partners, media and other public events/meetings.</p>

<p>vi. How well are Police and Crime Panels able to hold a PCC to account between elections?</p> <p>a. Does the role of the Police and Crime Panel need any further clarification?</p> <p>b. How well are the current “balanced”⁴³ membership arrangements ensuring effective scrutiny and support of PCCs?</p> <p>c. Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of Chief Constable proving practicable?</p> <p>d. Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?</p> <p>e. How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?</p>	<p>a) No</p> <p>b) The ‘balance’ removes most ‘politics’.</p> <p>c) Yes</p> <p>d) No. The current system covers this issue</p> <p>e) IPCC involvement if necessary PCP for lower level complaints. I can also be held to account for my compliance with the Code of Ethics</p>
<p>vii. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification on guidance?</p>	<p>There is still confusion over remits especially complaints. Clarity would be useful.</p> <p>A large number of operational matters are sent to my office when they should be dealt with, in the first instance, by the force which is still a matter for concern. While individual PCCs can try and address this in their area, additional help from Government would be welcome.</p>
<p>viii. According to the Financial Management Code, Audit Committees should ‘advise the PCC and the Chief Constable according to good governance principles and to adopt</p>	<p>We don’t have a joint Chief Finance Officer in Gwent and have had no conflict having a Joint Audit Committee. We feel that this works well in practice.</p>

<p>appropriate risk management arrangements.’ How well is this working in practise? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?</p>	
<p>ix. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?</p>	<p>I immediately adopted the voluntary Code of Conduct which was linked to my declaration of interest forms – both published to my website. I have agreed to adopt the Code of Ethics as I feel that it is important I lead by example. Gwent has also led the way on ethical crime recording. It is difficult to assess impact of how the code is being embedded at this early stage although the force is holding internal meetings for supervisors on the Code of Ethics.</p>
<p>x. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?</p>	<p>I am supporting the Chief Constable in his plans to set up an Ethics committee. The Chief Constable and I have welcomed the introduction and adoption of the Code and I feel that it is important that ethical behaviour is a golden thread running through all that we do. We are working on embedding the Code via various communication methods.</p>
<p>xi. Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?</p>	<p>All of these are published in detail on the website as required by the Specified information Order. I have received confirmation from the Home Office that my website is fully compliant.</p>
<p>xii. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?</p>	<p>Both the Deputy Commissioner and I have signed the voluntary Code of Conduct which links to a declaration of interests form. These are available on the website. I don’t consider that there have been any conflicts of interest.</p>

Gwent Police and Crime Panel

Response to the Committee on Standards in Public Life: Review of Local Policing – Accountability, Leadership and Ethics.

Consultation Questions

1. Are there any gaps in the existing mechanisms for holding PCCs to account?

The current accountability arrangements provide for Panels to ‘support and challenge’ PCCs. Whilst this role first seemed contradictory, in practice it hasn’t proved to be difficult as good scrutiny is built on positive relationships and respect of roles. A co-operative relationship has been established between the Gwent Police and Crime Commissioner and the Police and Crime Panel. Requests for information/reports by the Panel have always been agreed by the Commissioner and his staff, however, at a recent conference members of other Panels said they had experienced occasions when a Commissioner had refused to provide reports for consideration citing that the role of the Panel is ‘light touch’ scrutiny’. The Gwent Police and Crime Panel has held far more than the government’s predicted 4 meetings per annum since it was established. Experience suggests that the government expectation that panels would meet only infrequently is not possible if it is to undertake its statutory responsibilities and exercise robust scrutiny over the Commissioners actions. Therefore, the government should revise it’s expectation about the work of Panels and expect them to provide ‘support and robust scrutiny challenge’ to Commissioners wide ranging responsibilities.

The Panel has found that the available financial resources are too limiting due to the hypothecation applied to the Home Office grant. Police and Crime Panels in Wales have a different legal status due to the decision of the National Assembly for Wales to refuse the Home Secretary’s request to legislate in devolved matters. Whilst English Police and Crime Panels are joint local authority committees, in Wales they are considered to be Free Standing Public Bodies. This presents significant challenges for Welsh Police and Crime Panels as they are dependent solely on Home Office grant funding to meet all costs associated with discharging their duties. This leads to an inequality of available resources as English Panels can supplement financial resources from Council budgets, an advantage not applicable in Wales.

During the last 18 months the Gwent Police and Crime Panel officially met on 13 different occasions as well its members attending a training day and making time available to attend planning meetings. In addition, the Chair and my Vice Chair undertook various additional duties such as observing the recruitment process for the appointment of a chief constable, managing various significant media requests, considering complaints and having other regular Panel management correspondence. These duties go well beyond the light touch scrutiny of Police and Crime Commissioners proposed for Police and Crime and Panels.

The Home Office grant funding is currently hypothecated between Administration Costs, Translation Costs and Members' Expenses. This presents unnecessary barriers which are unhelpful in allowing the Panel to discharge its responsibilities effectively. In the Panel's first year of operation we found that we were required to meet much more frequently than the legislation envisaged. This resulted in Panel members continuing to attend meetings but unable to claim allowances or even travel expenses. This issue could ultimately result in only those members who can afford to provide public service participating in the work of Police and Crime Panels and this is likely to have a disproportionate impact and exclude those groups already underrepresented in public life.

The Panel wrote to the Home Secretary on 13th February 2014 to request an urgent review of the current funding arrangements for Welsh Police and Crime Panels. Members fully appreciate the difficult financial climate and, therefore, asked that the current discriminatory funding arrangements for Wales be resolved by implementing a simplified grant funding system. This would involve the current maximum grant funding currently available being provided in a single payment to a host authority annually without the current hypothecation streams. As a consequence Police and Crime Panels would be able to determine local expenditure needs to maximise the support and challenge offered to Police and Crime Commissioners. It is extremely disappointing that the Home Office has not yet provided a substantive answer to the Panel's request.

2. What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

Police and Crime Commissioners hold an unusual position of public office within the UK as they are elected as a single 'executive decision maker' rather than as part of a multiple collective who may later take executive positions within an administration. Therefore, should a Commissioner's actions be subject to significant criticism by the public, a police and crime panel or a relevant regulatory/audit body, there is currently no mechanism for the removal of a Commissioner other than for that individual to voluntarily resign from office (except for the suspension of a Police and Crime Commissioner charged with certain criminal offences). This position is incompatible with the promotion of high standards of accountability and leadership in public office due to the absence of an effective 'check and balance'. The government should give further consideration to how this issue can be addressed.

3. How are PCCs ensuring transparency in their decision making?

The Office of the Gwent Police and Crime Commissioner publish the Commissioner's decisions and specifically inform the Panel when the decisions have been published. The Panel considers this arrangement provides a good example of openness and transparency.

4. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

The Commissioner holds quarterly public meetings of a 'Strategy and Performance Board' which is a decision making forum for the Police and Crime Commissioner (and where needs be in consultation with the Chief Constable). The Board is responsible for:

- Any matters relating to the effectiveness and efficiency of the policing service delivered in Gwent
- The monitoring and management of delivery against the Police and Crime Plan
- The assessment of the viability of, and decisions on entering into collaborative initiatives
- The review of the delivery of operational policing through performance information
- The review and monitoring of the management of the budget by the Chief Financial Officer (Chief Constable)
- The overview of the distribution and level of staffing and resources for the delivery of policing services
- The review and identification of community concerns about policing and implementation of plans to address those issues
- The discussion of any issues arising from the implementation of the Memorandum of Understanding, scheme of consent and other key policies and procedures
- The provision of updates on on-going critical incidents and strategic threat and risks. Due to the sensitivity of some matters and their classification level under the governments protective marking scheme, the records relating to these items shall be subject to appropriate publication limitations

The Panel considers this arrangement provides a good example of openness and transparency.

5. What has worked best for PCCs in engaging with the public and local communities?

The Gwent PCC holds regular meetings with Community Councils and has made the PCP aware of his engagement activities through regular email alerts and reports to the Panel.

6. How well are Police and Crime Panels able to hold a PCC to account between elections?

- a. Does the role of the Police and Crime Panel need any further clarification?**

No

b. How well are the current “balanced” membership arrangements ensuring effective scrutiny and support of PCCs?

The Panel members discharge their responsibilities apolitically, therefore, the current arrangements have proved effective.

c. Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of a Chief Constable proving practicable?

The current arrangements have not proved to be difficult to implement and ensure that there is widespread support by a panel prior to vetoing an appointment or precept.

d. Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

There is no need to extend the power of veto further than the current arrangements for the Chief Constable. The Commissioner should have the right to appointment his team and the Panel will hold him accountable for the outcome of actions.

e. How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

This issue should be considered by the IPCC.

7. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

Whilst the Gwent Police and Crime Panel is aware of the different roles and responsibilities, it is likely that the responsibilities of Police and Crime Commissioners are not yet fully understood by the general public due to the short time these new arrangements have been in place.

8. According to the Financial Management Code, Audit Committees should ‘advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.’ How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

This matter is outside of the Gwent Police and Crime Panel’s responsibilities.

9. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

This matter is outside of the Gwent Police and Crime Panel's responsibilities. However, I understand that the PCC (and subsequently the Deputy PCC) voluntarily signed a code of conduct following the PCC elections in 2012 and is working with the Chief Constable to embed the new code of conduct.

10. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

This matter is outside of the Gwent Police and Crime Panel's responsibilities.

11. Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

This matter is outside of the Gwent Police and Crime Panel's responsibilities.

12. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

This matter is outside of the Gwent Police and Crime Panel's responsibilities.



RESPONSES TO COMMITTEE ON STANDARDS IN PUBLIC LIFE SCRUTINY

**Local Policing – Accountability, Leadership
and Ethics Scrutiny**

**From the Police and Crime Commissioner
for Hampshire, Mr Simon Hayes.**

**Prepared
28 November 2014**

Holding the Police and Crime Commissioner to account:

i. Are there any gaps in the existing mechanisms for holding PCCs to account?

ii. What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

iii. How are PCCs ensuring transparency in their decision making?

The introduction of directly elected PCCs provides the electorate with the ability to hold the office holder to account through the ballot box. This is an improvement on the previous position with police authorities, where all members, including the Chair of the authority, were appointed by local councillors.

The Police Reform and Social Responsibility Act 2011 enables a Police and Crime Panel to suspend a PCC where they are charged with certain serious offences, and also sets out clearly the grounds where a PCC is unable to continue to hold office e.g. where they are convicted of an imprisonable offence. Where issues are raised about the PCC's conduct which fall short of justifying criminal charges, the Act makes provision for these to be considered through the statutory complaints process, involving consideration by the Police and Crime Panel, or by the IPCC, depending on the seriousness of the issue. In the event that a right of recall were to be introduced for MPs i.e. allowing voters representing a minimum percentage of the local electorate to request a by-election where their MP was found to have engaged in serious wrongdoing, then it would be appropriate to extend that provision to include PCCs. There would be no justification to introduce such a right for PCCs alone, without equal application to MPs.

Under the Act, the PCC is required to produce and publish a Police and Crime Plan setting out the police and crime objectives for their area, and to produce and publish an annual report detailing the progress made against these objectives. The Plan and Annual Report are subject to the scrutiny in public by the Police and Crime Panel, and this is supplemented by quarterly update reports to the Panel on progress, scrutinised in public with the Commissioner in attendance to respond to questions. These mechanisms work well in enabling the Commissioner to be regularly held to account for progress against his published commitments.

A decision making protocol has been adopted to ensure that all relevant factors are considered when making significant decisions, and that the record is published on the Commissioner's website to ensure transparency. Published decisions are reported to the Police and Crime Panel enabling further scrutiny of individual matters. In addition, the Commissioner has adopted a Code of Corporate Governance which provides

- That those making decisions are provided with information that is relevant, timely and gives clear explanations of technical issues and their implications.
- That professional advice on legal and financial matters is available and recorded well in advance of decision making and used appropriately when decisions have significant legal or financial implications.
- Ensure that partnership papers are easily accessible and meetings are held in public unless there are good reasons for confidentiality. The partners must ensure that the partnership receives good quality advice and support and information about the views of citizens and stakeholders, so that robust and well informed decisions are made. Risk is managed at a corporate and operational level.

The Office of the Police and Crime Commissioner for Hampshire

Performance & Engagement:

iv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

v. What has worked best for PCCs in engaging with the public and local communities?

The Commissioner holds Commissioner's Performance, Accountability, Scrutiny and Strategy (COMPASS) meetings. The aim of COMPASS is to enable as many people as possible across Hampshire and the Isle of Wight to have access to some of the Commissioner's questioning of the Chief Constable. A recording of COMPASS is therefore made available on the PCC's website.

This questioning addresses the Commissioner's priorities and the Chief Constable's delivery of them. The content of each meeting is informed by views and questions which members of the public raise with the Commissioner, as well as analysis of trends, information and comparisons with other police forces. Some questions and issues from the public are asked directly by the Commissioner during each COMPASS meeting; others are raised during other meetings with the Chief Constable and his representatives.

These are quarterly meetings between the Commissioner and the Chief Constable, recorded and uploaded onto the PCC's website for public viewing. A particular performance theme is focused upon and scrutinised in depth at each meeting. The theme for each meeting is informed by the Commissioner's engagement with the public, ensuring that scrutiny is focused on matters of genuine public concern e.g. public confidence in policing. Members of the public are invited to submit questions to the Commissioner to raise with the Chief Constable. Meetings are recorded in different venues across Hampshire and the Isle of Wight, and where studio space permits, members of the public are invited to attend

The Commissioner has also established a separate quarterly programme of meetings with the Chief Constable to hold him to account for delivery of the Constabulary's 21 Commitments in support of the priorities of the Police and Crime Plan. Information from these meetings will also be published on the Commissioner's website.

Until recently Hampshire Constabulary would produce a monthly profile to report on its performance against targets within the Police and Crime Plan and wider performance. This document was available to the public and accessible through the constabulary's website. The move away from a target orientated performance framework to a reporting by exception framework has resulted in this document no longer being produced. The Commissioner is in discussions with the Chief Constable to agree how the performance of the Constabulary under the new framework will be made available to the public.

Police and Crime Panel:

vi. How well are Police and Crime Panels able to hold a PCC to account between elections?

a. Does the role of the Police and Crime Panel need any further clarification?

b. How well are the current "balanced"⁴³ membership arrangements ensuring effective scrutiny and support of PCCs?

c. Are the current membership thresholds requiring a two thirds majority to veto a PCC's level of precept and appointment of a Chief Constable proving practicable?

d. Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

e. How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

vii. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

Note the comments made above regarding the positive interaction between the Commissioner and the Panel

Internal changes within appointing Councils and the requirement to meet the balanced appointment objective do result in some turnover in Panel membership, which can create a risk of disruption to continuity, and a need to refresh members' understanding of the role of the Panel – in particular that it is responsible for scrutiny of the PCC and not of the Chief Constable. The Police and Crime Panel acts effectively as a critical friend to the Commissioner and experience is that it is unlikely to adopt a position on a particular matter based on party political considerations. In this context the emphasis the Act places on achieving political balance of membership may be overstated, and there may be a case for greater flexibility in this regard.

Due to the constructive working relationship between the Commissioner and Panel, it has not been necessary for powers of veto to be exercised.

The arrangement for PCCs to be held to account for standards of conduct is through the police complaints process, with complaints referred to the Police and Crime Panel. Experience is that the Panel deals thoroughly and expeditiously with any complaints received. There is scope for the Panel to have greater discretion to deal locally with complaints that are of a repetitive or vexatious nature, but which are required by legislation to be referred to the IPCC. This is a matter we have raised separately with the IPCC in the context of the review of the police complaints process.

Understanding of Police and Crime Commissioner Roles & Responsibilities:

vii. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

The role of the PCC is still relatively new and is still not generally understood by the public. This is reflected in voter turn-out at the November 2012 elections and recent by-elections, and in some blurring of the roles of the PCC and Chief Constable in media reporting e.g. lack of understanding that the PCC is not responsible for operational policing decisions. In addition the lack of clarity between roles was not helped by the publicity campaign launched by the Home Office prior to the 2012 elections, which labelled PCCs as crime fighters and has resulted in confusion regarding their role. There is a role for PCCs individually and collectively to promote greater understanding of the role and how it adds value through local engagement with public and partners, and building a media profile through a communications and engagement strategy, highlighting

their achievements and where their involvement has made a positive difference for local communities.

Audit Committees:

viii. According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.' How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

The PCC and Chief Constable have established a joint audit committee, but have retained separate Chief Finance Officers. This enables the Committee to receive and consider a wide range of matters affecting finance risk and governance in the local policing service and where required, to receive separate reports on the business of the PCC or Chief Constable, an example being that it monitors a separate strategic risk register for each party. This enables scrutiny to be focused on each organisation, but from an overall and joined-up perspective.

Ethical Leadership:

ix. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

x. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

xi. Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

xii. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

As ethical leaders, PCCs have responsibility to act, and to be seen to be acting, with honesty and integrity – doing what they have said they will do through their manifesto and Police and Crime Plan, evidencing this through personal conduct, annual reports and other material put into the public domain.

Within the current complaints process, there is scope for the integrity of the PCC to be brought into question where a complaint is presented in terms that may give rise to a criminal offence, in which case the Police and Crime Panel is unable to resolve this locally without reference to the IPCC. This can result in delay, and even where the allegation is found to be without foundation, can cause reputational damage to the PCC in the interim, creating disproportionate impact on public confidence. This may be an area where increasing the discretion of the Police and Crime Panel could be considered.

The PCC monitors the handling of complaints against police officers by the Constabulary's Professional Standards Department, and handles complaints against the Chief Constable.

The Specified Information Order sets out the types of propriety information that must be made available on respect of relevant office-holders, and this is published on the PCC's website

Also published on the website is the Code of Conduct adopted by the PCC, applying to the PCC and deputy PCC. The Code will be referenced where appropriate by the Police and Crime Panel in the handling of any conduct-related complaints.

Committee on Standards in Public Life

Local Policing – accountability, leadership and ethics

Response Form

Consultation Questions

The Committee has commenced an inquiry on the public accountability structures of the police. We are looking at the structures in place for ensuring ethical standards in the conduct and performance of Police and Crime Panels, Police and Crime Commissioners, and Chief Constables.

The Committee would like to hear your views. Please use this form to answer some or all of the questions in the Issues and Questions paper available at: [https://whitehall-admin.production.alpha.gov.co.uk/government/uploads/system/uploads/attachment_data/file/360941/Police Accountability Structures - Issues and Questions Paper.pdf](https://whitehall-admin.production.alpha.gov.co.uk/government/uploads/system/uploads/attachment_data/file/360941/Police_Accountability_Structures_-_Issues_and_Questions_Paper.pdf)

How to respond

Completed response forms should be sent by email to public@standards.gsi.gov.uk or by post to the Secretary to the Committee on Standards in Public Life GC05 1 Horse Guards Road, London SW1A 2HQ.

Name: Councillor David Stewart, Chair, Hampshire Police and Crime Panel
Contact address: Room 102, Elizabeth II Court South, The Castle, Winchester,

Postcode: SO23 8UJ

Contact Telephone: 01962 847336

E-mail: members.services@hants.gov.uk

Freedom of Information

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes. The relevant legislation in this context is the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Committee.

The Committee will process your personal data in accordance with the DPA and in most circumstances this will mean that your personal data will not be disclosed to third parties. However, it is important for the evidence considered by the Committee to be open and transparent. All responses will be published along with the identity of the person or organisation making the submission, unless the Committee is satisfied both that there is a compelling reason for an exemption to be granted and that the integrity of the process will not be undermined.

Please tick the appropriate response:

- Are you responding:
- *as a member of the public*
 - *as a member of the police*
 - *on behalf of another organisation*

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>

If you are responding on behalf of an organisation, please tell us your area of work, e.g police constabulary, regulator, trade union, think tank etc

Chair of the Hampshire Police and Crime Panel

Owing to the timings of this call out for evidence, the full Panel has not been able to review and approve this submission. Please therefore note that this evidence has been submitted by the Chairman on behalf of the Hampshire Police and Crime Panel.

Local Policing – accountability, leadership and ethics

Current Accountability Structures

Consultation Questions

Question 1:

Are there any gaps in the existing mechanisms for holding PCCs to account?

Comments

The issue of ‘accountability’ of PCCs, or who PCCs can be held accountable to, has been the subject of debate since PCCs were first elected in November 2012. The Association representing PCCs interpret the legislation to say that Commissioners are accountable only to the electorate – that is, through the ballot box every four years. As PCCs are elected politicians this fits in with current MP accountability structures (which are currently undergoing review), but unlike MPs, PCCs have a much greater level of autonomy and responsibility given their control of police budgets and strategic direction. On its own, relying on the views of voters every four years presents a large gap in holding PCCs to account.

The Hampshire Police and Crime Panel agree that it has a role to play in holding the PCC to account. Our role is to scrutinise and support the PCC, and we have several powers which enable us to do this on behalf of the population the Panel’s members represent. These include:

- Reviewing and, by a two thirds majority, potentially vetoing the PCC's proposed Council Tax precept levels.
- Reviewing the draft Police and Crime Plan, which sets the strategic direction of policing in the area.
- Confirming the Chief Constable, Deputy Police and Crime Commissioner and other senior officer’s appointment. The Panel has a veto power in relation to the Chief Constable’s appointment.
- Reviewing the PCC’s conduct and handling complaints – in addition, the PCP can suspend the PCC if they are charged with a two year imprisonable offence.
- Scrutinising the PCC's Annual Report.
- Reviewing and scrutinising decisions and actions by the PCC.

The Panel is aware of the limitations that it must work within to avoid breaching its remit or duplicating work elsewhere, and we have tried to shape a work programme that aims to be equal in both scrutinising and supporting the PCC.

We believe we have a good relationship with the current PCC, Mr Simon Hayes - which has improved as our access to timely information has increased - but we feel that there are changes that could be made centrally that would further improve our ability to provide a 'check and balance' to the PCC, and ensure all Panels are able to have access to the tools that enable them to do this:

- *PCCs should publish a forward plan of all key decisions due to be taken, and post-decision, the final decision taken and evidence they used to make it.*

The majority of Members on the PCP represent local authorities who are subject to legislation that ensures transparency of decision making on items that will impact on the local population. Local authorities are able to be challenged by the public on these decisions through meetings where deputations can be made, and the public usually have access to the same evidence and information used by the decision maker to inform any representation they may wish to make. Additionally, this information is retained so that it is accessible to all through webpages, libraries and archives. PCCs do not have any of these requirements, despite often taking high-cost high-impact decisions. Their responsibility is only that they publish any decision that they believe to be of 'significant public interest'. These decisions are not usually published with background information, and the PCC does not have a method for alerting the PCP of all 'key' decisions that are due to be taken, only those that he feels may be of interest to the Panel. We feel that by making it an expectation on PCCs to adhere to the same rules around transparency and openness of decision making as local authorities, it would enable the public to better hold PCCs to account, and to allow Panels to be more informed about important decisions that it may wish to scrutinise.

- *Minimum levels of information required for scrutiny of the precept should be detailed in secondary legislation.* The Panel have an important role to play in the budget and precept setting process, given their ability to review and, if felt appropriate, veto the Commissioner's precept. Members of the Panel are aware that they do not have a function to perform in publically scrutinising the budget, but believe that without timely access to financial information underpinning the Commissioner's precept proposals, the Panel cannot perform its function in relation to the precept. It would be helpful for PCCs to be guided on the information that should be made available to Panels on the precept and supporting budgetary information, to ensure more consistency and ensure that the public and the PCP can add value to

the process.

Question 2:

What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

Comments

We have detailed above in section (i) steps that the Panel believe could be taken to improve the accountability of PCCs to the public.

We are aware through papers that have been tabled at our formal meeting of the methods the PCC uses to meet with the public, and hold the Chief Constable to account in a public forum. For example, the Commissioner holds 'COMPASS' sessions, which are meetings held in public which allow a 'first come, first served' audience to observe a question and answer session between the PCC and the Chief Constable. The public are able to ask questions of the PCC (and Chief Constable) in advance of the meeting.

Question 3:

How are PCCs ensuring transparency in their decision making?

Comments

We have detailed above in section (i) our thoughts on what steps could be taken to improve the transparency of PCC decision making.

Question 4:

What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

Comments

The PCP publishes all of the information received from the PCC and other parties for consideration at our meetings on our website, which is accessible to the public. We are happy to provide this information in other formats if requested by a member of the public.

We have had very limited interaction with the Chief Constable, inviting him to one meeting with the agreement of the PCC, on the basis that we are aware that we do not hold this role to account. Members do however find it useful to triangulate the information the Chief Constable/Constabulary directly holds to get a fuller picture of policing in Hampshire and whether the PCC is achieving against his priorities listed in his Police and Crime Plan.

Although we could list the information that we are aware of our local PCC and Constabulary publishing on performance, we feel that this question is best left to PCCs and Constabularies to answer.

Question 5:

What has worked best for PCCs in engaging with the public and local communities?

Comments

We feel that this question is best left to PCCs to answer.

Question 6:

How well are Police and Crime Panels able to hold a PCC to account between elections?

Comments

The Panel have a good working relationship and engages constructively with the Police and Crime Commissioner for Hampshire (and the Isle of Wight). The Panel believes it has effectively carried out its relevant statutory functions in conjunction with the Commissioner. This has included holding two Confirmation Hearings, reviewing two precepts, setting up and using a non-serious complaint process, reviewing the Police and Crime Plan, scrutinising two Annual Reports, and generally scrutinising and supporting the Commissioner in areas relating to his functions. We have also now begun a programme of proactive scrutiny, where evidence is requested from key stakeholders on the effectiveness of actions under the priorities listed in the Police and Crime Plan. We think it is important to triangulate the information received from the Commissioner with other organisations, stakeholders and

the public, so that the Panel can build a picture of how successful work strands relating to the Commissioner's priorities have been, and the Panel can make recommendations to him on areas of best practice or gaps in provision. Feedback has been positive from the PCC, the Panel and contributors thus far.

The Panel is also looking to strengthen its visibility to the public, and inclusion of the public's views. Currently the Panel encourages individuals and community groups to engage with the Panel through an easy-to-access website, rotational meeting venues across the Hampshire and Isle of Wight area, and provision for public questions and deputations to the Panel. The Panel hopes to improve on this model by encouraging participation in its proactive scrutiny proposals.

Those Members who are appointed to PCPs could benefit from a national programme of training, funded centrally, which provides them with the skills required to scrutinise and support the PCC effectively. Officers supporting the Panel have provided Hampshire Members with informal training and briefings when requested, and this has been supplemented by attendance at national events and taking advantage of free half-day development sessions, but a standardised training programme may increase PCC accountability by giving Members the tools they need to ask effective questions and understand national standards and benchmarks.

Question 6a:

Does the role of the Police and Crime Panel need any further clarification?

Comments

We do not believe that the role of Police and Crime Panels requires further clarification – we are aware of our role and remit in relation to PCCs.

Question 6b:

How well are the current “balanced”¹ membership arrangements ensuring effective scrutiny and support of PCCs?

Comments

The Hampshire PCP has three co-opted local authority members, which enables us to meet the balanced appointment objective to the best of our ability, ensuring that the PCP is representative of the political and geographic diversity of Hampshire and the Isle of Wight. However, as a scrutiny panel we aim to be apolitical in our approach to our scrutiny and support of the PCC, and feel that thus far we have worked well together to challenge the PCC without party politics playing a role in our discussions. This has likely been assisted by the fact that the current local PCC is independent.

Question 6c:

Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of a Chief Constable proving practicable?

Comments

We have not to date utilised our powers to veto in Hampshire, but are content that the two-thirds majority is an appropriate threshold.

¹ Schedule 6 paragraph 31 PRSRA sets out the duty to provide a balanced panel. The “balanced appointment objective” referred to in this paragraph is the objective that local authority members of a police and crime panel (when taken together)—

(a) represent all parts of the relevant police area;

(b) represent the political make-up of—

(i) the relevant local authority, or

(ii) the relevant local authorities (when taken together);

(c) have the skills, knowledge and experience necessary for the police and crime panel to discharge its functions effectively.

Question 6d:

Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

Comments

We have held two confirmation hearings to date in Hampshire – one for a new Chief Constable, and one for a Deputy Police and Crime Commissioner. The Panel were satisfied with the PCC's choice of candidate in both cases and therefore recommended their appointments. The PCP is aware of its ability to not recommend the appointment of candidates that they do not have a veto power for, and would likely use this option rather than a veto which would be seen as a career-ending decision.

We received positive feedback from the public and press following these confirmation hearings, who liked the ability to be able to see 'senior officials' being interviewed in a public meeting, and the option in the case of the Chief Constable to veto their appointment if they were not appropriate for the role. We therefore think that from the perspective of transparency and accountability extending our powers to senior staff would be seen in a positive light by the public. Although we were supportive of the PCC's choice of candidate for Deputy PCC in Hampshire, other Panels did not recommend their PCC's choice of candidate for clearly evidenced reasons, and therefore a veto power might particularly be considered for this role.

Any additional powers of veto would need to be balanced by clear guidance from the Home Office as to the minimum standards expected for each job role, in order that Panel's are able to clearly evidence why they have not recommended or vetoed a candidate's appointment to a post.

Question 6e:

How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

Comments

Currently Police and Crime Panels have a role to play in considering non-criminal conduct complaints against PCCs.

The Panel's Complaints Sub-Committee has used considerable resource in the past two years in order to review non-criminal complaints made against the Commissioner. We are currently streamlining our processes to ensure that all areas of complaint handling are as efficient and resource-appropriate as possible.

The complaints process works well in Hampshire, but the outcomes that the Panel can reach are not equitable to the time and resource required to execute the process in line with the legislation. The majority of our complainants thus far have already been known to local policing through historical complaints against the police or police authority. Hypothetically, those complainants who may have the type of complaint envisaged by parliament when drafting the secondary legislation on this area may be disillusioned by the extent of the Panel's 'powers': the ability to ask for an apology for the PCC (if they are minded to agree to one), recommendations on policy or the drafting of an 'action plan'.

The restrictions placed on Panels reviewing complaints are also not conducive to understanding a complaint, as Panels are restricted to asking for comment from the complainant and complained against but anything further than this is seen as an 'investigation'. Therefore it is often one word against another, with the Panel having to take a view based on the limited information they have before them.

Additionally, the expectation of the public of the complaints process in our experience exceeds the powers Police and Crime Panels have to resolve complaints.

We would also seek clarification in regard to 'serious complaints', that is, those complaints from the public which allege, or appear to allege, that criminal conduct has taken place by the PCC. The Sub-Committee has to date referred all complaints to the IPCC where an allegation of criminal conduct has been made by the complainant, even if the complaint is on the surface spurious or not supported by evidence, given that the Regulations are clear on the Police and Crime Panel's responsibility to do so. This has sometimes caused consternation with the Office of the PCC, given that a referral mechanism is triggered and at that point the Commissioner is 'under review'. Potential areas where it would be beneficial for further clarification on this part of the Regulations would include:

- Consideration of a triage stage which requires evidence to be provided by the complainant that criminal conduct has taken place.
- Guidance on what types of alleged criminal conduct should be referred to the IPCC.

In conclusion on this section, there are two options for the future of complaints against PCCs: either providing Panels with the ability to investigate complaints, and the power to recommend outcomes that have 'teeth', or removing these powers completely from Panels and providing the IPCC or an alternative organisation with responsibility for complaints.

Question 7:

Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification

or guidance?

Comments

The Hampshire Police and Crime Panel have engaged with local communities in several ways since its inception through:

- a) Attendance at its public meetings and use of its deputation/questions rules of procedure.
- b) Proactive scrutiny sessions, which encourage written evidence from select community groups, and generally invites evidence from the public.
- c) Complaints made against the Police and Crime Commissioner for Hampshire.
- d) General correspondence and enquiries from the public.

The Panel does not have enough evidence to state that the boundaries between the different roles noted in the question are not understood, but has found through the four means of engagement above that members of the public communicating with the Panel are often confused about who is responsible for addressing their correspondence or concerns. For example, the Panel has received complaints against the Commissioner which relate more to the responsibilities of the Chief Constable, and correspondence have been received by the Panel which would better suit a response from the Commissioner or Chief Constable.

The Panel has clarified roles or directed the public to more appropriate organisations when approached incorrectly.

Question 8:

According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.' How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

Comments

The Hampshire Police and Crime Panel do not have any information on the work of the Audit Committee, and therefore are unable to answer this question.

Ethical Leadership Consultation Questions

Question 9:

What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

Comments

The Panel does not have a response to this question.

Question 10:

What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

Comments

The Panel does not have a response to this question.

Question 11:

Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

Comments

The Panel does not have a response to this question.

Question 12:

What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

Comments

The Panel does not have a response to this question.

**Committee on Standards in Public Life:
Local Policing – accountability, leadership and ethics**

Hertfordshire’s Police and Crime Commissioner’s response

We are pleased to see Police and Crime Commissioners are being consulted on the important issues relating to accountability, leadership and ethics and welcome the opportunity to respond to this consultation.

When David Lloyd took up the office of the Police and Crime Commissioner he swore an oath to act with integrity and diligence, abiding by the seven principles set out in the Standards of Public Life (Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership), to be a voice of the public and ensure transparency in his decisions on spending public money.

Police and Crime Panels

1). *Are there any gaps in the existing mechanisms for holding PCCs to account?*

As directly elected public representatives PCCs are principally held to account by the electorate at election times. It is important that this principle is preserved and that any additional scrutiny mechanisms are not able to thwart the will of the electorate and the mandate that they have given.

Police and Crime Panels have the main direct scrutiny role between elections with strong powers to advise, challenge and hold to account within appropriate limits on their ability to fetter the PCC’s mandate.

There are a number of additional mechanisms through which PCCs are scrutinised in Hertfordshire - for instance the PCC tries to appear annually before each of the 10 district-based community safety partnerships and is subject to questioning by the members and the public. He makes a formal visit to each of the boroughs and districts twice a year where he meets community leaders from the public and voluntary sector.

The PCC also chairs a quarterly County Community Safety Board which is made up of representatives of all of the CSPs as well as additional countywide partners from areas such as health and probation. The Commissioner reports to the board on his actions and submits key strategies and proposals to the board for scrutiny ahead of decision making.

In addition individual local authorities in Hertfordshire seek to hold the Commissioner to account through a variety of scrutiny committees. This is an example of a recent invitation which the Commissioner accepted from North Herts District Council

“You will be aware that Section 19 of the Police and Justice Act 2006 (as amended) requires every local authority to have a crime and disorder committee with the power to review or scrutinise decisions made or other action taken in connection with the discharge by the responsible authorities of their crime and disorder functions. In North Hertfordshire, the Overview and Scrutiny Committee undertakes this function on behalf of the Council.

The Committee would like you and the Chief Constable to speak about the strategic issues facing policing in Hertfordshire such as the financial challenges; the re-organisation of the Constabulary; collaboration with other Constabularies; governance and accountability; and what this means for policing in North Hertfordshire.”

The PCC routinely accepts such invitations from the 10 local authorities in Hertfordshire and in addition attends quarterly meetings of the County Council’s Community Safety and Planning Cabinet Panel where he presents a report and is subject to questions from its members in public.

Above all, the PCC is subject to direct scrutiny from the public in a great variety of arenas, regularly attending public meetings organised on geographical and interest basis and presents key strategies and decisions (including around last year’s precept) for open public consultation. He is held to account by a lively local press corps to which he makes himself readily available.

2). What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?

See the above answer for examples of accountability mechanisms working well.

The PCC role is a new one and was not well understood when it was launched. In Hertfordshire this situation has already changed greatly. The PCC has quickly become recognised as the key publicly accountable figure on policing and crime issues in Hertfordshire. This is in marked contrast to the lack of public accountability which existed

under a virtually invisible police authority (of which he was a member) and fills a real public need.

PCCs are fundamentally accountable to the public by virtue of their elected status and the nature of their role. The mechanisms by which they demonstrate this will inevitably vary to meet the different circumstances in different parts of the country and it is vital that PCCs are allowed the freedom to innovate in this area.

3). How are PCCs ensuring transparency in their decision making? And what information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

The Commissioner is accountable to the people of Hertfordshire through the ballot box and scrutinised on a regular basis through the independent Police and Crime Panel (PCP). The PCP consists of 14 members; one elected member from each local authority and three further members to ensure that the panel is balanced and represents all the parts of and reflect the political make-up of Hertfordshire, and has the skills, knowledge and experience necessary to discharge its functions effectively. As a public meeting, the PCP provides a function for the public to scrutinise the performance of the Constabulary and to hold the Commissioner to account.

The PCP holds the Commissioner to account on important issues relating to the level of the precept, Chief Constable appointments, complaints and conduct matters.

Formal business is conducted through a series of meetings and all decisions of significant public interest are published on the PCC website. Two boards have been established to provide strategic direction and decision making forums:

- The Strategic Executive Board (SEB) discusses issues related to the effectiveness and efficiency of the policing service delivered in Hertfordshire. The public can view a summary of the key issues and decisions taken each month on the PCC website along with any supporting papers.
- The Commissioner's Executive Board (CEB) is the primary decision making forum for the Commissioner, where decisions are not required to be taken in consultation with the Chief Constable, or where wider partnership issues or statutory duties are involved. Minutes for this meeting are accessible on the PCC website. Decisions of significant public interest arising from this meeting are additionally published on the 'My Decisions' section of the PCC website along with any supporting papers.

All complaints received at the OPCC in relation to the conduct of officers are referred to the Joint Professional Standards Department. The Commissioner keeps oversight of this by reviewing formal confidential and performance reports at SEB. The Commissioner and Deputy Chief Executive also drill down into issues through dip sampling complaint cases by theme on a monthly basis which allows them to get specific information about certain cases and triangulate this information to ensure that it has been dealt with in accordance with professional standards.

4). What has worked best for PCCs in engaging with the public and local communities?

The PCC uses a range of mechanisms to engage the public and local communities. In addition to frequent visits in the course of “normal business” the PCC has a deep dive “District Day in each of the 10 districts/ boroughs of Hertfordshire twice a year. This enables the Commissioner to focus on one area in detail for the day to understand the issues that people are facing and hear their ideas and concerns of the local police, local authority, businesses, charities and volunteer groups, and what the Commissioner can do to develop plans to change things to help keep the local community safe. This enables the Commissioner to be responsive to gaps in service provision and focus attention on issues as they arise in a timely manner.

In addition to this, the Commissioner provides a strong leadership and consultative role through his significant role in partnership working. The OPCC attends each of the 10 Community Safety Partnerships in each of the districts/boroughs to hear any concerns or difficulties statutory agencies face in delivering services for the public. This enables the Commissioner to push forward the best use of public money. The Commissioner also chairs the Community Safety Board with Chief Executives, Councillors and partners from across the County to enable issues and questions to be raised and debated before decisions are made.

The Commissioner’s Police and Crime Plan is entitled “Everybody’s Business” and at its heart is a focus on harnessing the resources of the whole community – police, partner agencies, individual members of the public and volunteers – in the cause of community safety. To do this he is sought to create a structure in Hertfordshire which supports and empowers this way of working. His aim has been to devolve responsibility and capacity to local communities to enable them to identify and resolve their own problems as far as possible.

The key mechanism for this has been Hertfordshire's effective set of Community Safety Partnerships. These play not only an active problem solving role but a scrutiny role and the capacity to articulate local issues. They are an effective sounding board for local communities and the PCC has built county wide structures around them to allow their voices to be heard. In addition he provides direct financial support for their work and most important has ensured that the constabulary is organised on a structural basis to support them. The local policing structure exactly mirrors the partnerships with each CSP having a chief inspector with a team with a clear mandate to work closely with their local partners to deliver community safety.

The Commissioner is also responsive to individual members of the public who may feel that the system in some way has let them down and offers the opportunity for the public to meet the Commissioner in person and voice their concerns.

The Commissioner's Community Fund provides financial support to innovative local schemes which aim to make the Communities of Hertfordshire safer. The Commissioner uses his own discretionary funding to help individuals, communities and businesses to get together and generate ideas. Proposals can cover a range of activities and can include but are not limited to practical work, research projects, equipment and materials, and awareness training, or training. This engagement with organisations ensures that support is targeted to work that complements existing activity and enables the Commissioner to see the breadth of work being achieved across the County.

The County Council covers the exact boundaries of the Constabulary. The electorate supported the decision for the Commissioner to stand as a County Councillor for a division partly because this helps to bring together the political function in the same way that officers are trying to work together operationally. Indeed, the biggest proof of officers working together is that the Commissioner's Chief Executive is also the Director of Community Protection and the Chief Fire Officer.

5). How well are Police and Crime Panels able to hold a PCC to account between elections?

The Police and Crime Panels have extensive powers and skills to play their part in holding PCCs to account – their effectiveness may vary with their quality.

6). Does the role of the Police and Crime Panel need any further clarification?

The role of the panels, like that of PCCs was not always well understood when they were set up. In Hertfordshire this has changed markedly over time. Panel members have had time to understand and develop the role and it is now working well.

7). How well are the current “balanced”⁴³ membership arrangements ensuring effective scrutiny and support of PCCs?

As long as limits remain in place to prevent abuse of their role panels can continue to provide scrutiny and support without threatening the PCC’s democratic mandate. Whether or not they do so in practice will always depend on the individuals selected. An increase in their powers would significantly increase the possibility of conflict or deadlock in some areas.

8). Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of a Chief Constable proving practicable?

Yes

9). Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

No

10). How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

PCCs are held accountable primarily by the electorate, by public opinion and in some part by statute. The panel’s main role is to scrutinise, uncover and articulate issues which they then lay before the public. The Commissioner also has a Monitoring Officer who draws the PCC’s attention to any actual or possible contravention of law, maladministration or injustice.

For the whistleblowing policy, please see our [Scheme of Corporate Governance](#). Also see [Raising Concerns and Complaints](#).

11). *Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?*

It has become increasingly clear from the amount of correspondence from the public to the OPCC that the public do not adequately understand the roles and responsibilities of the

Commissioner. Many fail to see the distinction and often ask the Commissioner to take action on matters (particularly operational) that are outside of his statutory duties.

There is evidence to suggest that there needs to be further clarification and guidance, tailored to the public to distinguish his post from that of the Chief Constable and the governance that supports this. Whilst locally in Hertfordshire the Commissioner can help the residents of Hertfordshire understand his role and responsibilities, we feel there is a strong role nationally for the APCC and Home Office to help the public better understand this, rather than it be left to the press to choose how they present this role as it always means that PCCs are on the back foot.

The first PCC elections were at the wrong time of the year with little or no publicity. We would suggest there is a strong role for national bodies to ensure that the public are better informed about PCCs so they come to the ballot box and when they do they can make an informed decision about which candidate to elect. However the PCC believes that the very fact that the next election will be held on a local election day, and the subsequent one on a general election day, will see a significant increase in turnout.

12). According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.' How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

The OPCC for Hertfordshire and Hertfordshire Constabulary have a joint Audit Committee which meet quarterly and provide independent scrutiny and assurance on the adequacy of the corporate governance and risk management frameworks. Hertfordshire's Audit Committee is made up of a Chair and four other independent members who advise both the PCC and Chief Constable for Hertfordshire. Appropriate frameworks are also in place to manage risk through a Risk Register which is reviewed at the Strategic Executive Board (SEB) and Commissioner's Executive Board (CEB).

In April 2014, the Commissioner decided to move away from having a joint Chief Finance Officer (CFO) with Hertfordshire Constabulary (a position inherited from the Police Authority) to have an independent part time CFO. This new independent role has enabled decisions about the Constabulary to be more objective and has allowed for a greater breadth of views than had previously been the case. This new independent role is working well and already showing successful outcomes with income being generated through wise reinvestments.

Ethical leadership to promote and sustain the values of the Policing Code of Ethics

13). What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

See response to Question 14.

14). What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

Prior to the Police Service Code of Ethics being laid before Parliament, Hertfordshire Constabulary and Hertfordshire's Police and Crime Commissioner created a Equality, Ethics and Integrity Board (EEIB) as a strategic group that hold overall leadership responsibility for the coordination and embedding delivery of the three strands: Equality and Inclusion, Ethics and Integrity and Corporate Health.

Since the EEIB was set up in May 2013, it has sought to integrate the newly published National 'Code of Ethics' authored by the College of Policing into Hertfordshire Constabulary's way of working. The code of ethics underpins the considerations of the EEIB and Ethics Committee, which alongside the Constabulary's statutory duties to eliminate unlawful discrimination and advance equality of opportunity, will aim to improve public confidence and provide greater transparency and accountability to the community.

The EEIB which meets quarterly has the responsibility for ensuring that the organisational environment and climate created for staff to work in is one which promotes fairness, respect and wellbeing where satisfied, engaged, healthy and motivated employees deliver high quality services to the public.

The PCC sits on the EEIB board and provides a scrutiny role. The Commissioner provides strategic oversight, to ensure that the public have full confidence in the standards, honesty and transparency of the force, holding the Chief Constable to account and responding with action and reassurance if/when public confidence is lost. The Commissioner also regularly tables ethics and integrity topics at the Strategic Executive Board to facilitate scrutiny across a range of key areas across the Constabulary.

15). Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

The Commissioner has arguably the most transparent register of any politician in the county.

The Hertfordshire's Crime Commissioner's website:

http://www.hertscommissioner.org/about_me/what_we_cost.aspx provides a detailed breakdown of all expenses, gift and hospitality offered on a monthly basis and the body offering it. The PCC website also publishes a register of disclosable interests for the PCC and Deputy PCC. This helps to ensure that where the interests of exercising the functions of the OPCC might conflict with any disclosable or other interest it is declared to avoid such conflict and take necessary action. All the agendas, minutes and papers from the public Police and Crime Panels are published.

16). What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

PCCs have a monitoring officer working under clear guidance and providing advice on where potential conflicts may arise and how they should be resolved.



HERTFORDSHIRE Police and Crime Panel

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Please ask for Gavin Miles

Gavin Miles
24 Nov 2014

The Committee on Standards in Public Life

CONSULTATION ON LOCAL POLICING ACCOUNTABILITY RESPONSE OF HERTFORDSHIRE POLICE AND CRIME PANEL

Thank you for your consultation which happily coincided with the agenda planning for the Panel's November 13 meeting. Accordingly the topic was reported to the panel and the questions reported and considered by the panel in a public session.

As a result a number of comments were made in response to the questions asked. I think it best to provide the comments rather than attempt to distil them into a single response of the whole panel.

1. ***Are there any gaps in the existing mechanisms for holding PCCs to account?*** The limitations on the powers of the PCP to hold the PCC to account are well known to the panel and have been reported widely in the media and by the House of Commons Home Affairs Select Committee. However, we also recognise that it was always the intention of government that the PCC should be answerable to the electorate and whilst the CSPL paper also suggests that the requirement for a politically balanced panel means that a panel of the same political leaning as the PCC may be seen as supporting rather than scrutinising the PCC we have sought to ensure that the impact is otherwise.

Despite the foregoing one member has suggested that the system to hold the PCC to account is opaque given roles and responsibilities are spread across a number of agencies. Another gave examples of HMIC and IPCC having some remit on accountability of the PCC as well as the electorate and the PCP.

2. ***What can PCCs do themselves to improve their accountability to the public between elections?*** *How well are these mechanisms working in practice?* Again, the panel is aware from previous meetings of the statutory information publication regime and the fact that many PCCs have not published all they should, or have not published it in a user friendly way. Similar comments have been made with regard to the Office of the Hertfordshire PCC at our meetings but, following, robust questioning and suggestions for improvement access to information has been significantly improved. It may be considered appropriate to reflect some of those discussions to recommend that a standard 'easy-to-

follow' template with links to up to date information be used by all PCCs to comply with the statutory disclosure regime. This could be quite easily achieved with guidance by the Home Office as to layout and content based on the best practice of OPCCs nationally.

A member also pointed out that there are no specific questions on the police and crime plan and the PCC's annual report. These are statutory publications and should be key to holding the PCC to account, both by the PCP and the public. They have to be presented to the PCP and a recommendation has to be made on them. However, the format and content is up to the PCC. The PCP can comment on the format and content but it might be helpful to again have some indication of best practice.

3. How are PCCs ensuring transparency in their decision making? The Hertfordshire PCC holds a Strategic Executive Board (OPCC and Constabulary) and publishes minutes of those meetings; a Commissioner's Executive Board (OPCC) and publishes the minutes of those meetings as well as the legally required list of decisions made. In addition the PCC holds an informal community safety forum which includes the relevant lead members from each of the principal local authorities in the county and proposals are sounded out. There is a considerable variation in the lists of decisions made published by PCC's nationally with some reporting only the few high level decisions and others a more comprehensive list.

4. What information is being made available to the public to enable them to scrutinise the performance of their local force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable? Aspects of this question are touched on above. In addition the panel is aware of the work done on the crime statistics published by which the PCC and the constabulary are held to account.

Members of the panel felt that publication of comparable data from both police forces and the Crime Survey of England and Wales would be helpful although further work would be needed to drill down behind these bare statistics. That of course does not necessarily take into account other factors that impact on the level of crime or the efficient oversight of the police by the PCC.

5. What has worked best for PCCs in engaging with the public and local communities? The panel may have a view of this from members' own perspectives or those of their councils. It would be interesting to compare this with the views of the PCC on the subject.

6. How well are PCPs able to hold PCCs to account between elections?

a) does the role of PCPs need any further clarification? The role is clearly set out in the legislation. Some have commented that the specification in the legislation makes the role of the PCP too procedural for it to be of public interest.

The powers that the PCP have been given are more apparent than real given a veto of a precept can result in the PCC being able to change the proposal by a tiny amount to achieve what was proposed originally. Similarly it seems very odd that the PCP can veto the PCC's first choice of Chief Constable but not the second. A member suggested that the PCP should not be involved at all in the selection of the candidate but should be able to concentrate on the process and procedure and this could include obtaining a report from an independent overseer. It has also been argued that the PCP should have more freedom to explore issues that would enable it to determine whether the PCC is properly

exercising his role in ensuring that the public receive full 'value for money' from its police service.

The appointment of the PCC's current deputy PCC was advertised with a role description and the appointment process was transparent and members felt this was very beneficial and should be commended to the CSPL.

b) ***how well are the current 'balanced' membership arrangements ensuring effective scrutiny and support of PCCs?*** It is difficult to consider how a panel that is not balanced could have any legitimacy. The numbers and means of securing members in the legislation means that some odd results occur nationally, fortunately this has not arisen in Hertfordshire.

c) ***Are the current membership thresholds requiring a two thirds majority to veto a PCC's level of precept and appointment of chief constable proving practicable?*** Some PCPs have voted against a precept proposal but failed to achieve the two thirds majority but of course that has not arisen in Hertfordshire. The panel may consider it appropriate to suggest the government revisit the requirement for precept proposals where the PCC retains the ability to revise the precept as much or as little as they wish whilst keeping it for appointment proposals.

d) ***Should PCPs have power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?*** The use of a veto is clearly very serious and potentially career ending so such a power needs very careful use if it is to be given. An alternative that is less than a veto to require the PCC to take certain steps to review a decision based entirely on procedural shortcomings assessed by the PCP might make this power more meaningful. Again powers to provide an opinion on 'value for money' would also be useful.

e) ***How should PCCs be held to account for their standards of personal conduct? What role should PCPs have in this?*** The PCP does have a role in complaints regarding the PCC and to the extent that this does not involve a potential criminal offence this will be carried out with regard to the seven principles of public life set out above. The ability of the PCP to carry out this role is though very limited as only informal resolution and no investigation is possible. The PCP itself does not have the resources to investigate even if the limitations were to be relaxed.

7. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constables being adequately communicated and understood by local communities? Is there evidence that they need any further clarification or guidance?

The panel is aware that this issue is very difficult to make clear. There is a significant overlap between the PCC and Chief Constable roles and responsibilities and it is bound, therefore, to be difficult to communicate this difference to the public. This will be consistent with the position prior to the introduction of PCCs however, as the split between the Police Authority and Chief Constable roles were similarly ill-defined. The position will only have worsened to the extent that a PCC is more visible than a Police Authority and it is natural to see the role at first blush as akin to a line management role of the Chief Constable, which of course it is not.

8. According to the Financial Management Code, Audit Committees should 'advise the PCC and the Chief Constable according to good governance principles and to

adopt appropriate risk management arrangements'. How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases a joint Audit Committee and/or chief financial officer? The Hertfordshire PCC has a joint Audit Committee with the Constabulary. The chief financial officer was shared with the Constabulary until April 2014 when a separate arrangement was put in place.

Yours faithfully

**Gavin Miles
Clerk to the Panel**

Response from PCC for Humberside

Committee on standards in Public Life

Local Policing – accountability, leadership and ethics

“Only 7% of people even knew that police authorities existed... Police authorities were invisible committees of unknown appointees that had no contact with the public, whose members were installed and not elected, and who lacked the mandate to provide the leadership necessary to get things done” Teresa May speech to the Partnership Conference, Harrogate, Tuesday 18 November 2014

Introduction

Teresa May’s speech at the Partnership Conference in Harrogate on Tuesday 18 November 2014 clearly identified the first and arguably the most important issue, which is transparency and public accountability. I wholeheartedly support this study and the Committee. I hope this comprehensive response goes some way to answering your specific questions and also adds the contextual layers of local, regional and national issues on top to provide that wider and more complete picture.

I have drawn out some of the issues raised in your original consultation paper with the specific questions at Annex A and other supporting documentation enclosed within the remaining Annexes.

Police and Crime Commissioner Personal Impressions

Being among the first cohort of elected Police and Crime Commissioners and having now completed two years in office I have a few key initial impressions and thoughts, listed below. The underpinning tenant is that as the Police and Crime Commissioner I am a servant of the public; the police service is “owned” by the public and I am committed to ensuring that the public receive the best possible policing service.

1. The introduction of Police and Crime Commissioners is a positive step forward in the arena of police governance
2. Police and Crime Commissioners have a real and unique role to bring local issues and priorities to local policing
3. Police and Crime Commissioners, for the first time, have the remit and opportunity to bring the “police” and the “and crime” agendas together for the wider benefit of the public
4. HMIC are acting outside of legislation, are not acting in the public interest and are overstepping their remit. Their role and part of policing governance must be reviewed immediately before they fully implement their new PEEL inspection regime, which is highly likely to re-introduce targets, negative and false reporting along with subsequent reduction in public confidence – hardly in the public interest as they claim
5. The committee on Standards in Public Life should explore the wider governance landscape and include local authorities. The negative impact of local authorities can limit the positive outcomes and aspirations of the Police and Crime Commissioner and others. The wider interests of the public must be a priority

Governance and Legislation

The legislation is very clear and is repeated in your consultation paper. Section 14 of the Policing Protocol 2011 makes clear:

“The public accountability for the delivery and performance of the police service is placed into the hands of the PCC on behalf of their electorate. The PCC draws on their mandate to set and shape the strategic objectives of their force area in consultation with the Chief Constable. They are accountable to the electorate; the Chief Constable is accountable to their PCC. The [Police and Crime] Panel within each force area is empowered to maintain a regular check and balance on the performance of the PCC in that context”

This legislation provides an unambiguous mandate on the Police and Crime Commissioner to set local police priorities in the form of the Police and Crime Plan. A key reason for this established direction is to devolve local policing to the local people and, by extension, to the elected Police and Crime Commissioner.

Additionally, section 10 of the Policing Protocol states the following:

“All parties will abide by the seven principles set out in Standards in Public Life: First Report of the Committee on Standards in Public Life (a) (known as the “Nolan Principles”).”

The focus on accountability, leadership and ethics through the seven Nolan principles, is a valid benchmark and one in which Police and Crime Commissioners have established themselves. However, the Policing Protocol states that all parties will abide by these principles. Therefore, by definition this includes the Police and Crime Panel and by extension all of the Town and Parish Councils along with the Local Authorities.

Studies into Police and Crime Commissioners must consider the entire picture both locally and across the full national spectrum. The consultation paper highlights that there are seven other studies. The subsequent question is who is co-ordinating these reviews in order to provide a coherent response and recommendations? Part of the declared intent of this current study is to examine the governance of policing. The three key constituent parts of this governance framework are the Chief Constable, Police and Crime Commissioner and the Police and Crime Panel. Within Humberside the Police and Crime Panel has consistently failed. For the first two years the panel has been unable to agree its membership and has failed to hold me to account. This is entirely due to the insular, isolated and negative situation of local politics in Humberside. I highlighted above that in order to study the impact and accountability of Police and Crime Commissioners the entire system should be examined and the litmus test of “in the public interest” applied. With respect to the Police and Crime Panel in Humberside the result is clear in that this element of the governance framework has failed. Additionally, to fully explore the role and accountability of Police and Crime Commissioners the full extent of the role must be considered and should not limit itself solely to the police element.

In recent months the Humberside Police and Crime Panel has attempted to move beyond its initial failings. However, at the time of writing this positive intent has not been fully realised. My aspiration is that the Police and Crime Panel becomes an integral part of the wider role and becomes a two-way conduit to both hold me to account and also act as the focal point for the delivery of partnership working between the local authorities and the Police and Crime Commissioner.

The established legislation, the Police Reform and Social Responsibility Act 2011, and the Policing Protocol set the separation of roles and responsibilities between the Police and Crime Commissioner and the Chief Constable. However, in practice the boundaries between the roles are a little more blurred. Whilst operational policing is generally clearly defined the impact and potential

outcomes can shift from purely operational further towards the domain of the Police and Crime Commissioner and the wider public interest. Therefore, the Police and Crime Commissioner should maintain a regular overview of operational policing. With such involvement comes a requirement for genuine trust between the Chief Constable and the Police and Crime Commissioner.

The Police and Crime Commissioner is responsible for the “totality of policing within their force area” as described in the Policing Protocol. Therefore, the real confusion is not just an understanding of the blurred boundaries between the Chief Constable and the Police and Crime Commissioner, but also with HMIC. Roles, responsibilities and the remit of HMIC on local policing has become hugely confused, which is having an immensely negative and damaging effect on local communities, which is not in the public interest in anybody’s language.

The consultation paper goes further with the following at paragraph 16:

“the relationship between the PCC and Chief Constable is defined by the PCC’s democratic mandate to hold the Chief Constable to account, and by the law itself. The PRSRA provides that PCCs must hold Chief Constables to account for, amongst other things, the overall performance of the force including against the priorities set out in the police and crime plan, the performance of officers and staff and the exercise by the Chief Constable of his functions. The Chief Constable is accountable to the law for the exercise of police powers and to the PCC for the delivery of efficient and effective policing management of resources and expenditure by the police force. However, it is up to each PCC to decide how practically they will hold the police to account on behalf of the public. In order to do so effectively, PCCs must also be in receipt of high quality information, although the legislation does not specify where they must obtain this from.”

The direction from the established legislation and from the above extract from the consultation paper provides the answer to the currently confused landscape:

1. Police and Crime Commissioner is responsible for the totality of policing in their force area
2. The Chief Constable is responsible for operational policing
3. The governance and oversight mechanisms between the Chief Constable and the Police and Crime Commissioner need to be clearly defined and robust. Such systems must be regular and transparent, whilst maintaining allowances for potential operational sensitivities
4. HMIC provide an inwards facing professional inspection regime on the technical professional aspect of policing. The inspections and subsequent reports are specific to local force areas and are conducted in line with the priorities and objectives set out in the Police and Crime Plan (see Annex B)

Role of the Police and Crime Commissioner

Locally, despite wide exposure there is still an element of mis-understanding as to the precise role of the Police and Crime Commissioner. However, that is not a direct failing of any individual or group, rather the interaction and interest of the public.

Nationally, the emerging role and influence of the APCC along with the dangerous direction of HMIC adds to the national confusion surrounding this governance system.

The Home Office states that the role of a PCC is to ensure the policing needs of their communities are met as effectively as possible, bringing communities close to the police, building confidence in the system and restoring trust. Their objective is to cut crime and deliver an effective and efficient police service in their police force locality by:

1. Holding the Chief Constable to account for the delivery of the force
2. Setting and updating a police and crime plan
3. Setting the force budget and precept
4. Regularly engaging with the public and communities
5. Appointing, and where necessary dismissing, the Chief Constable.

Trying to isolate Police and Crime Commissioners firstly by studying only half of their role; police, and not looking at the wider contextual picture will produce the same kind of results that HMIC reach, which are un-qualitative and un-quantitative.

For example; within the Humberside force area there are four Unitary Authorities. There is mixture of political affiliations, however, as Police and Crime Commissioner I made a deliberate effort to conduct my duties without political bias. The role and duties of the Police and Crime Commissioner can only be conducted fully with the consent and partnership of these local Unitary Authorities. Without such consent the Police and Crime Commissioner has not the political authority or the financial levers to dictate partnerships and local direction. Therefore, again, to produce a full and balanced study into one element of the political landscape a wider net must be cast. This is especially valid in Humberside as one of the four Unitary Authorities appears to consistently hamper any attempt to deliver services that are in the public interest.

The title and subsequent role of the Police and Crime Commissioner must also be fully considered as part of this study. Policing is only half of the requirement with “and crime” being the other and equally important element. The true potential of the Police and Crime Commissioner role is that both agendas can be aligned in order to fully consider and influence the impact of crime on the local population. Currently there are numerous public, private and third sector organisations that work in isolation. There is so much potential to provide first rate public services, prevent crime, protect the population, support victims and provide communities that have purpose and positive energy. The “and crime” agenda is largely undefined in legislation, however, used correctly can be a powerful force, which must be considered within this study.

Her Majesty’s Inspectorate of Constabularies (HMIC)

The Police and Crime Commissioner is duty bound to consult the public, set the policing priorities and hold the Chief Constable to account on the delivery of those priorities. However, over the last 24 months this seemingly unambiguous position has become confused by the over reach of Her Majesty’s Inspectorate of Constabulary (HMIC). The HMIC mission statement is as follows:

“Through inspecting, monitoring and advising, to promote and advance improvements in the efficiency and effectiveness of policing. We will do this independently, professionally and fairly, always championing the public interest, and we will explain what we do and why”

The role of HMIC:

“HMIC independently assesses police forces and policing activity ranging from neighbourhood teams through serious crime to the fight against terrorism – in the public interest. In preparing our reports, we ask the questions which citizens would ask, and publish the answers in accessible form, using our expertise to interpret the evidence. We provide authoritative information to allow

the public to compare the performance of their force against others, and our evidence is used to drive improvements in the service to the public”

The roles of local accountability through the legislative bodies, Police and Crime Commissioner, and HMIC should be symbiotic – local accountability with expert professional inward looking assessment of policing effectiveness against the local priorities established in the Police and Crime Plan. However, this is not the case and the current direction of HMIC is simply undermining the role the Chief Constable, Police and Crime Commissioner, Police and Crime Panel and the local population.

An ever increasing, prescriptive and nationally imposed inspection regime on local forces who are supposed to be guided by local priorities within the Police and Crime Plan produces obvious conflict. Ultimately, it forces Chief Constables to make the choice between following the local priorities of the electorate and a nationally imposed inspection regime that attempts to set targets and directly compare forces against each other, despite significant differences in funding, demographics, geography and socioeconomic background.

It would appear that the mission and role of HMIC should be re-examined and that a study is conducted as to whether the current and future imposition of HMIC is indeed in the public interest as is claimed. The role of HMIC, its independence and future position with the fabric of policing should be explored further and in conjunction with current legislation to ensure a coherent system of local priorities along with robust checks and balances.

The recent speech by the Home Secretary, The Right Honourable Teresa May MP, at a Partnership Conference in Harrogate on 18 November 2014, at Annex C, adds to the worrying direction that central government and by extension HMIC are taking that appears to deliberately confuse and move against established legislation:

*“I made HMIC properly independent to shine a light on inefficiency and poor practice. That is what this report has done, and what HMIC will continue to do. Later this month the new PEEL programme will be introduced, bringing in annual inspections of all police forces in England and Wales. These annual inspections will allow the public to compare how their police force is performing in cutting crime and delivering value for money. **They will radically change the way police forces are held to account** and help drive improvements across the police.*

And significantly – for all of you here today – the results of those inspections will form the basis for how the public decides to vote in the next police and crime commissioner elections in 2016”

This confused landscape is engendering mistrust and having an entirely negative impact on public trust and confidence. This surely cannot be in the public interest at the very time when it is needed most due to imposed austerity measures that impact on our ability to provide a policing service and wider adjoined public service.

Following the publication of every HMIC inspection report, legislation directs that Police and Crime Commissioners are to provide a written response back to HMIC. I have taken this mandated responsibility very seriously and invested time and effort to provide a constructive, positive but honest appraisal to the individual inspection and also the wider role of HMIC in local policing governance. Mr Tom Winsor, Her Majesty’s Chief Inspector of Constabularies (HMCI), has very recently provided some feedback to all of those letters sent by my office and those of other Police

and Crime Commissioners. The national concerns of Police and Crime Commissioners, police officers and the public are apparent from both a selection of the my letters, enclosed at Annexes D and E, along with Mr Winsor's recent reply, at Annex F. Mr Winsor is quoting legislation that is vague and open to interpretation. Unfortunately we are progressing down a path, against our will, that is the interpretation of Mr Winsor. The legislation does offer a symbiotic working relationship that would deliver a coherent and co-ordinated service to the public, unfortunately, Mr Winsor and HMIC appear to not what that outcome. I have included a very small number of extracts below.

"Objections to the effect that HMIC makes recommendations which are contrary to Government policy – if in fact they are – are not on point. HMIC has no political position; it is concerned solely with establishing the facts" **Comment:** With the publication of the HMIC reports to the media before the police or Police and Crime Commissioner have a real opportunity to explain certain elements or allow for a realistic debate the reports are open to media scrutiny and the power of the tabloid headline. Any contextual information is buried deep in the article, if at all, and is essentially lost. This entirely destroys public confidence and trust in local policing; this is not in the public interest.

"the nature and intensity of inspection is principally a function of the annual inspection programme which is approved by the Home Secretary, and the further commissions which the Home Secretary gives to HMIC...Almost no inspection work is a result of HMIC carrying out inspections on its own initiative... that said, we are conscious and sensitive to the expressed concern. We know that inspections have an effect on the resources of the police force in question. We will, as far as reasonably practicable, streamline our inspection work so as to create the lightest draw on the resources of the police forces in question. However, as explained, it is Parliament – not HMIC – which has prescribed that there must be inspections to facilitate the effective operation of local as well as national accountability. We believe very few, if any, chief officers would argue that inspection and accountability are unnecessary or impertinent. And if they were to do so, they would be in contradiction of the settled will of Parliament" **Comment:** Veiled threats, interpretation of the actual requirement and utter disregard/ignorance of the severe pressure that local police forces are under is staggering. Everybody understands and welcomes the requirement for sensible and practicable accountability, however, inspections should not become THE focus, which must remain on the delivery of a service to the public. Currently police forces and Chief Officers are repeatedly under immense pressure to satisfy an ever increasing inspection regime, whilst concurrently trying to deliver more (HMIC recommendations that are not relevant and realistic in terms of available resources or in line with the Police and Crime Plan) with less.

"It is sometimes said that HMIC makes too many recommendations, and that it should cost them. We respectfully disagree" **Comment:** The opportunity for debate on this and other issues rests with Mr Winsor agreeing or not agreeing, which is subsequently based on a single interpretation of legislation. I and others are losing trust and respect for HMIC as an organisation due to their lack of understanding and apparent desire to degrade public confidence.

"Recommendations are made where we find failings which need to be corrected, and respects in which a force must improve in order to achieve the highest reasonably practicable level of efficiency and effectiveness" **Comment:** I fully endorse this. The disappointing aspect, is that Mr Winsor and I obviously agree on a number of areas, however, the implementation and subsequent reporting is where we struggle; I am trying to provide the very best police service whilst HMIC appear intent on destroying it from the inside. We must work together.

Transparency and Accountability

Police and Crime Commissioners are a new and innovative addition to the public arena. Looking back on the first two years of Police and Crime Commissioners there have been isolated incidents that have generated significant local, regional and national media interest. For example; Shaun Wright from South Yorkshire and Ann Barnes from Kent have come under significant scrutiny.

However, there are over forty Police and Crime Commissioners, many of whom have made a positive impact within their force area. For the first time the local population have a readily identifiable individual who is accountable to the public and must justify themselves and their actions. The previous Police Authorities were invisible, unaccountable bodies that provided little to no benefit at significant cost to the taxpayer.

A lot of discussion and media attention has been directed at the voter turnout for the Police and Crime Commissioners. As stated in your public consultation paper the average turnout was 15.1%. The next election for Police and Crime Commissioners is in May 2016, a year out of synch with the next general election in May 2015. This doesn't appear to make any sense and also creates the position of having to establish another set of elections at significant cost. The Police and Crime Commissioner election schedule should have been aligned to the general election, or at the very least to previously programmed local elections.

As stated at the very beginning, transparency is a key aspect of the Police and Crime Commissioner role. An extract from your consultation paper is as follows:

“One of the key aspects of the role of the PCC is to open their force to greater transparency. The PRSRA provides that the PCC, as an “elected local policing body” must issue a police and crime plan within the financial year an election is held. This plan includes:

- a. their police and crime objectives*
- b. financial and other resources provided*
- c. the means by which the Chief Constable will report to the PCC and*
- d. how the Chief Constable's performance will be measured.*

The PCC must also produce an annual report and publish information considered necessary to enable people living in the local area to assess the performance of the Chief Constable in exercising their functions. Just as important is for PCCs to be (and seen to be) transparent and open about their performance and they have a duty under section 11(1) PRSRA to publish specified information relating to the exercise of their functions and be transparent in their decision making. PCCs have a duty to engage with the public and local communities, put out good information and create a genuine dialogue”

Annexes G to H highlight the public engagement schedule for the PCC, Performance Blog and CoPaCC submissions for innovation and transparency. These provide further detail and examples that may prove useful in determining the positive impact of a PCC in their local communities.

A subsequent question that is posed in the consultation paper is the potential to and how to compare Police and Crime Commissioners. There is a distinct link to HMIC and their intent to compare police forces. In order to compare you need to set targets to allow direct comparison and then allocate a ranking in a league table. I remain utterly dedicated to removing any and all targets in Humberside Police as they engender false and dangerous practices simply to appease an inspectorate. This is quite simply not in the public interest as the real priorities are missed and victims suffer; all whilst politicians and inspectorates congratulate themselves on the fall of volume crime such as bicycle theft when victims of serious assault are missed.

The consultation paper continues to explore the disadvantages of target setting. This is another example of confused messaging and direction towards the policing landscape; HMIC or Police and Crime Plan? Additionally how are Police and Crime Commissioner going to be compared when

considering their full role of police *and crime*? The priorities of each force area are established in the Police and Crime Plan and therefore there will be 41 different sets of priorities and objectives. How can a realistic, qualitative and quantitative assessment be made? Also, why would a comparison be required and what would achieve? The fascination of league tables and targets is counter-productive and certainly not in the public interest. Transparency and accountability is the positive and public-centric way forwards.

Audit Committees provide a vital function of independent checks and balances. The PCC and the Chief Constable acted quickly following his election to establish a strong Joint Independent Audit Committee. The Committee held its first meeting in March 2013 and has met regularly during 2013/14 and 2014/15

The Committee considers all internal audit reports prepared by the Internal Audit Team from the West Yorkshire OPCC who provide this service together with reports from the external auditors, KPMG. The Committee agrees the audit plans for the year and has established its own work programme.

The Internal Audit Plan for 2014/15 incorporated an audit of the transparency of the OPCC. This report has recently been completed and is included at Annex K. An extract is as follows:

“Overall it has been determined by Internal Audit that the OPCC is compliant with the Elected Local Policing Bodies Order. The information is particularly clearly laid out on the OPCC’s website and collated together for ease of access. This positive view has also been endorsed by the Comparison of Police and Crime Commissioners (CoPaCC), when they assessed that the Humberside Police and Crime Commissioner was the second most transparent OPCC in England and Wales”

Humberside currently do not have a separate ethics committee. However, this function is currently being explored and potential options, Terms of Reference and committee composition examined to justify the cost v benefit question.

Conclusion

The introduction of the Police and Crime Commissioners is a positive step forwards in local accountability and transparency. For the first time there is an identifiable individual who the public can hold to account.

The role of Police and Crime Commissioners is new, the legislation surrounding Police and Crime Commissioners is new and therefore there is an element of confusion. This confusion is both local and national, although with clear leadership at both levels this confusion could be removed.

To fully examine the governance of policing and consider the role of the Police and Crime Commissioner the full local picture needs to be explored. This includes local authorities who form the bulk of the membership for the Police and Crime Panel. In these times of austerity the historic boundaries and grievances between organisations must be removed if we are to deliver public services and generally act in a professional manner in the public interest. Partnerships, collaborations and communication between organisations are vital.

Annexes:

- A. Directed Questions
- B. Police Oracle Article – HMIC
- C. Home Secretary Speech, 18 November 2014
- D. PCC for Humberside response to Core Business HMIC Report
- E. PCC for Humberside response to HMIC Consultation on PEEL
- F. Letter from Mr Winsor to PCCs
- G. PCC for Humberside Public Engagements
- H. Performance Blog
- I. CoPaCC Submissions for Innovation and Transparency
- J. Audit Report – Transparency of the OPCC
- K. ERYC Scrutiny Panel Report
- L. ERYC Letter to the Committee on Standards in Public Life
- M. Humberside Police Response to ERYC Scrutiny Panel Report

Response of East Riding of Yorkshire Council to Humberside Police Force Redesign Plan

Report of the Overview and Scrutiny Review Panel

September 2014

CONTENTS

		Pages
1.	Chairman’s Foreword	1
2.	Executive Summary	2-4
3.	Review Panel Recommendations	5-6
4.	Members of the Review Panel	7
5.	Financial Implications	7
6.	Methodology	7-8
7.	Legislation and Guidance	8
8.	Introduction	9
9.	National Picture	10
10.	Local Picture	11-12
11.	Humberside Police Force Current Structure	13-14
12.	Crime Figures for the East Riding and Humberside	15-18
13.	‘Building the Future’ - Humberside Police Force Redesign	19
14.	The Panel’s Response to Humberside Police’s ‘Building the Future’ Proposals	20
14.1	Consultation	20-21
15.	Implementation Timeframe for ‘Building the Future’	22
16.	Reserves and Precept	23
17.	IT and Mobile Technology	24-25
18.	Reducing Demand & Customer Service	26
19.	Neighbourhood Policing	27-28
20.	Police Stations, Response Times and Estate Functions	29-31
21.	Policing Numbers	32-33
22.	Response from East Riding of Yorkshire Council Stakeholders	34-35
23.	Conclusion	36
Table of Abbreviations and Terms		37
Bibliography		38
Acknowledgements		39
Appendix 1	Methodology and Scope	40-41
Appendix 2	The Work of the Council in Reducing Anti-Social Behaviour, Crime and Disorder	42-45
Appendix 3	Questions for the Police and Crime Commissioner and His Staff	46
Appendix 4	Questions for the Chief Constable and Her Staff	47-48

1. CHAIRMAN'S FOREWORD

- 1.1 The East Riding of Yorkshire Council has a long history of supporting Humberside Police in helping them provide a vital service to reduce and prevent crime and doing much to create a sense of safety within our communities.
- 1.2 Alongside the police, working in partnership, East Riding of Yorkshire Council provides a range of services to deal with such issues as anti-social behaviour, domestic violence and youth offending. Much effective work is done through both organisations working together, and it is really important that this continues and develops further in the future in response to the financial challenges we both face.
- 1.3 I very much welcomed the opportunity to be Chairman of this review panel. The purpose of the review was to examine the operational restructuring of Humberside Police that is currently underway and to evaluate how changes in service structure and operation are likely impact on residents in our area and the delivery of East Riding Council services.
- 1.4 The task of undertaking the review was not easy. The Panel faced the challenge of trying to assess the nature of the new police structure and service at a time when much of the detail had either not yet been developed or was only available in outline; a situation which was not helped by limited involvement in the review by the Office of the Police and Crime Commissioner and the Chief Constable. There was also time pressure; with the new service structure due to be operational from April 2015 we wanted to complete our report well in advance of that date in order to give it the opportunity to be fully considered. In order to evaluate the effectiveness of the new structure once it is fully in place within the East Riding, the Panel has reserved the option to re-convene during Autumn 2015.
- 1.5 During the course of the review Members of the Panel developed a number of recommendations, which we hope Humberside Police will consider positively in relation to general aspects of its redesign process and specific elements within it - they are all important and are listed numbers 2 to 12 on pages 5 and 6 of this report. The most important recommendation (our number 1 recommendation), however, relates to the issue of communication. We took the view that Humberside Police could have made much more effort to engage and consult with East Riding of Yorkshire Council during the development phase of its reform and with the general public it serves, and we call for increased co-operation from now on with regards to development and implementation of the new police structure and its impact within the East Riding area.
- 1.6 On behalf of the Panel I would like to express our appreciation of the hard work done by all members of Humberside Police Force, our understanding of the challenge the service faces during times of severe budget restraints and our thanks to the two officers of Humberside Police who gave us their time in telling the Panel about some of the changes in-hand during the course of this review.
- 1.7 I would like to offer my thanks to all Members of the Review Panel for their commitment and input into the task, to Gareth Naidoo for organisation of the review and producing this report and to Jane Stewart along with other Council Officers who gave their advice and support.



Councillor Shaun Horton
Chairman of the Review Panel

2. EXECUTIVE SUMMARY

- 2.1 The purpose of the Council's Review Panel is to gain an understanding of Humberside Police's redesign plans and any possible implications for East Riding residents, and act as a formal consultation process with the Office of the Police and Crime Commissioner and the Chief Constable.
- 2.2 The Council has a statutory responsibility under the Police and Justice Act 2006 with power to review or scrutinise decisions made, or activities taken, by responsible authorities (i.e. Humberside Police) in connection with their crime and disorder role.
- 2.3 At the time of finalising this report, no business case or written rationale for their proposed changes to policing was made available by the Office of the Police Crime Commissioner or Humberside Police for the Review Panel to consider. The Panel has therefore sought other evidence referenced in this report and relied on interviews with parties who agreed to take part, together with information gained from articles in the local press.
- 2.4 The request for a review into the Humberside Police Force restructure was made by the Overview Management Committee at its meeting of 23 January 2014. The Council's Review Panel was set-up to consider the local impact of policing changes in the East Riding only and the value-for-money from its residents' contribution to the police precept. It has a different role to the Government's Police and Crime Review Panel, which is Humber-wide in its representation.
- 2.5 Due to reducing budgets and the need to modernise the Force, Humberside Police is undergoing a period of huge transition. Its redesign plan 'Building the Future' will bring about an immense change to the way Humberside Police is structured (doing away with the traditional divisional structure across the Humberside Police area and replacing with a series of area-wide 'Commands') and will instigate an operational shift to the way Humberside Police undertakes its operations. The redesign plan, due for implementation in April 2015, will include a significant reduction in police officers and police staff.
- 2.6 Information on Humberside Police's 'Building the Future' redesign plan has been limited, with the Chief Constable and Police and Crime Commissioner declining to fully engage with this review. This has made it difficult for the Panel to assess the full impact the new Humberside Police structure might have on the prevention, reduction and tackling of crime in the East Riding and Humberside area. The Panel, however, is grateful that the Divisional Commander for 'C' Division was able to present outline proposals, particularly on the changes in respect of the Communities Command, one of the four new commands currently being planned.
- 2.7 Whilst it is anticipated that greater detail on Humberside Police's 'Building the Future' plan will emerge in the near future, the Panel felt it necessary to draw to a conclusion its review, to allow time for Humberside Police to take the Panel's concerns into consideration and, if deemed necessary, take corrective action before implementation of the Plan takes place.
- 2.8 The Panel recognises that due to the limited involvement from both the Office of the Police and Crime Commissioner and the Chief Constable, the Council's statutory review could only go so far in scrutinising the changes being planned to policing in Humberside. With this in mind, the Panel reserves the option to re-convene during Autumn 2015 to test the effectiveness of the new police structure and delivery in line with the Council's statutory function.

- 2.9 Taking into account the information presented to it, the Panel has taken a measured approach in making its recommendations to assist the Office of the Police and Crime Commissioner and the Chief Constable in making their planned changes to policing. The Panel hopes these changes to policing will not adversely affect the safety of local communities and residents of the East Riding.
- 2.10 The Panel in concluding its findings raised the following key issues:
1. The Panel has not had the level of co-operation it expected from the Chief Constable or Police and Crime Commissioner. Both the Office of the Police and Crime Commissioner and the Chief Constable declined the Panel's invitation to attend and respond to questions prepared by the Panel (see Appendix 3 and 4). The Panel leaves an open-ended invitation for both parties to attend and to present its draft plan for future policing to the Council and requests that time is allowed for meaningful consultation and revisions as required.
 2. The Office of the Police and Crime Commissioner and Humberside Police have not made arrangements to formally consult with all local communities in the East Riding affected by the radical changes in policing that are reported to be now "well-advanced". The Council is not alone in forming this view. Her Majesty's Inspectorate of Constabulary has raised the same issue about Humberside Police not consulting the public, this time over the Police's policy decision not to attend all reports of crime and incidents in the area.¹
 3. According to Her Majesty's Inspectorate of Constabulary, Humberside Police 'requires improvement' in financial planning for the short and long term. Humberside Police is rated towards the low end of a "good" judgement overall compared to other police forces and Her Majesty's Inspectorate of Constabulary has a concern about the security of the financial position of Humberside Police². The Panel is concerned that Humberside Police is rushing ahead to meet an implementation date of 1 April 2015 to meet financial targets and in doing so, is risking the success of the changes it plans to introduce.
 4. It is not clear how the additional revenue gained by raising the police precept by 1.99% and the £32m held in reserves will be used by the Office of the Police and Crime Commissioner to achieve acceptable levels of policing in the East Riding.
 5. There was insufficient information provided by Humberside Police to give the Panel confidence that an IT and mobile solution could be implemented reliably and securely by March 2015 to increase the productivity of frontline police officers, particularly when visiting remote locations in the East Riding where Broadband and signal strength remains an issue.
 6. The Panel has serious concerns about the robustness of the data being used by Humberside Police to evidence its view that 44% of calls for a policing response are "waste and failure demand", meaning that residents, in their view, are inappropriately seeking help from the Police. The Panel would like to scrutinise Humberside Police's position and ensure the public receive services, and victims the support they require, without being passed from 'pillar to post' between police and Council services.
 7. The Panel was reassured by the Divisional Commander for 'C' Division that the East Riding would receive its fair share of neighbourhood policing, and its work on

¹ HMIC: *Core business: An Inspection of crime prevention, police attendance and use of police time* (letter dated 3 September 2014)

² HMIC: *Policing in Austerity: Meeting the Challenge July 2014*

preventing crime in the area would continue unchanged; however, the Panel wishes to see this put into practice.

8. According to Her Majesty's Inspectorate of Constabulary, there were 41 police stations in 2010 which were predicted to be reduced to 15 by March 2015, a closure of 26 police stations. Current figures put the number of police stations at 36 which means that five police stations have already been closed. Humberside Police plan to close a further 21 police stations on the north and south bank by March 2015³. There are currently 14 police stations in the East Riding and 9 in Hull (13 on the south bank), but no detail was provided to confirm where these closures would take place over the next seven months.
9. The Office of the Police and Crime Commissioner is just one of five other areas that have not set a benchmark target for response times to emergency incidents⁴. The Panel believes this is a crucial flaw and will prevent the measuring of success of the planned changes to policing. Her Majesty's Inspectorate of Constabulary is concerned response times nationally are increasing following the funding constraints and the Panel is firmly of the view that it would be sensible to monitor response time performance.
10. Her Majesty's Inspectorate of Constabulary report states that by March 2015, there will be 1,563 police officers (a reduction of 495 police officers since March 2010). This police officer reduction in Humberside is the highest in the country. The national average is 11%; the reduction in Humberside is 24%. An additional 210 police officer posts are still to be reduced and it is not clear which areas of Humberside or which specific police services will be adversely affected by this planned reduction⁵.
11. The Panel has raised other concerns in this report and is aware of a further report from Her Majesty's Inspectorate of Constabulary in which it is advised that the integrity of Police crime data needs significant improvement. This raises a key issue in comparing crime levels year-on-year, leaving the Panel unable to ascertain whether the fall in crime in recent years is due to improved policing and co-operation from partners, or instead, due to the under-reporting of crime as found by the Inspectorate. HMIC reported that 27% of incidents reported by the public to Humberside Police, which the Inspectorate identified as crimes, had not been recorded by Humberside Police as a crime⁶.

³ HMIC: *Responding to austerity: Humberside Police July 2014* (Page 23)

⁴ HMIC: *Policing in Austerity: Meeting the Challenge July 2014* (Page 21)

⁵ HMIC: *Responding to austerity: Humberside Police July 2014* (Page 15)

⁶ HMIC: *Crime Data Integrity: Inspection of Humberside Police August 2014* (Page 6)

3. REVIEW PANEL RECOMMENDATIONS

No.	Primary Recommendation	
1.	Primary Recommendation (pages 21 & 36)	That Humberside Police fully engage with East Riding of Yorkshire Council on its redesign plans and any impact this may have on the work of the Council, so that the two organisations can work in partnership in an open and transparent nature for the benefit of East Riding residents.

No.	Area of Concern	Additional Recommendations
2.	Consultation (page 21)	That a timetabled programme of consultation be developed on Police service changes with all local communities in the East Riding, which includes details of how feedback will be used to shape Humberside Police's transformation plans.
3.	Implementation Timeframe for 'Building the Future' (page 22)	That the Humberside Police redesign process be implemented over a longer period of time in order to enable a phased approach to be taken in collaboration with all partners and local communities.
4.	IT and Mobile Technology (page 25)	That Humberside Police and the Council continue to work towards the identification and approval of further opportunities for joint working, particularly through the use of new technology and agile working arrangements where there is merit in doing so.
5.		That Humberside Police engage more fully with local public sector partners to exploit the potential that Public Service Networks provide.
6.	Reducing Demand & Customer Service (page 26)	That clear procedures are developed and agreed through a joint approach by all relevant partners to customer contact for related services so that communities are clear about who they should contact when in need of help and support.
7.	Neighbourhood Policing (page 28)	That Humberside Police set out how communities can regularly influence the design and delivery of neighbourhood policing to ensure that their specific needs are met and that this be achieved by consultation with ward councillors and town and parish councils.
8.		That the Office of Police and Crime Commissioner reconsider its decision to not provide match funding for Neighbourhood Watch schemes in the East Riding

No.	Area of Concern	Additional Recommendations
9.	Police Stations, Response Times and Estate Functions (page 31)	That clear information be provided to the public on the proposed number of police stations in the East Riding and expected response times following implementation of Humberside Police's "Building the Future" redesign plan.
10.		That consultation on the closure of any police stations in the East Riding be undertaken by Humberside Police with the relevant local community and town or parish council and all other partners. No area should be disadvantaged by any proposed police station closures.
11.		That Humberside Police, the Council and other partners consider how the estates function can be better joined up across the East Riding to make more cost effective use of resources such as shared back office and frontline information, advice and guidance.
12.	Policing Numbers (page 33)	That Humberside Police provide assurances that the East Riding will not be disproportionately affected by a reduction in policing numbers and resources, and that its local communities remain safe and protected in the future.

4. MEMBERS OF THE REVIEW PANEL

4.1 The membership of the Review Panel was set at six Members from East Riding of Yorkshire Council (four Conservatives, one Labour and one Independent).

4.2 Members of the Review Panel consisted of: Councillors Shaun Horton (Conservative) as Chairman, Chad Chadwick (Conservative), Paul Hogan (Labour), Phyllis Pollard (Conservative), Ann Suggit (Independent) and Felicity Temple (Conservative).

4.3 Queries regarding this review should be directed to:

Gareth Naidoo
Senior Committee Manager (Overview and Scrutiny)
East Riding of Yorkshire Council
Democratic Services
County Hall
Beverley
HU17 9BA
Tel. (01482) 393206
Email: gareth.naidoo@eastriding.gov.uk

5. FINANCIAL IMPLICATIONS

5.1 A number of Council service areas work in conjunction with Humberside Police to help tackle and prevent crime and disorder and anti-social behaviour; however, it is unclear at this stage as to whether the redesign will have any financial implications on the Council and whether there will be a need for the Council to fill any voids left by a reduction in police allocations and resources.

6. METHODOLOGY

6.1 The Review Panel was set up to establish the extent of the proposed changes in policing and to consider the possible impact on the level of crime and disorder and anti-social behaviour in the East Riding.

6.2 The scope and methodology for the review outlined the objectives and issues that the Panel wished to consider (as set out at Appendix 1).

6.3 Seven meetings of the Panel took place over a six month period. Both the Chief Constable and the Office of the Police and Crime Commissioner were invited to participate in the review at a time mutually convenient to all parties; however, both declined the invitations to attend and did not provide the information requested by the Panel. The Panel was, however, fortunate to meet with the Divisional Commander for the East Riding (C Division), to whom the Panel was grateful for her openness and willingness to engage with the review.

6.4 During the course of the review the Panel met with the following services who are involved in preventing and tackling crime, disorder and anti-social behaviour in the East Riding:

- Resource Strategy
- Anti-Social Behaviour Team
- Domestic Violence Team

- Youth Offending Team
- Drugs and Alcohol Treatment (Public Health)
- Licensing
- Troubled Families

- 6.5 The Panel also called forward the relevant portfolio holders for this review, seeking their views on the subject:
- Councillor Cracknell, Portfolio Holder for Community Involvement and Performance
 - Councillor Owen, Portfolio Holder for Transformation and Strategic Partnerships
 - Councillor Parnaby OBE, Portfolio Holder for Key Strategic Issues

7. LEGISLATION AND GUIDANCE

- 7.1 The Council has a statutory responsibility, under Part 3, Section 19 of the Police and Justice Act 2006, with the power to review or scrutinise decisions made, or activities taken, by responsible authorities (i.e. Humberside Police) in connection with their crime and disorder role.

8. INTRODUCTION

- 8.1 Following the Comprehensive Spending Review of October 2010, the Government announced that central funding to police services in England and Wales would be reduced by 20% in the four years from March 2011 to March 2015.
- 8.2 According to the latest report of Her Majesty's Inspectorate of Constabulary, police forces in England and Wales have over the four years of the current spending review (2011/12 - 2014/15) found almost £2.53bn worth of savings, developing savings plans to achieve 96% of this savings figure. The outstanding gap will be met by deploying £107m of reserves.⁷
- 8.3 Her Majesty's Inspectorate of Constabulary report went on to state that as budgets continue to be severely constrained, it is inevitable that opportunities for further savings and efficiencies will be fewer, and achieving them will be more difficult. Consideration must be given to how funding will be allocated in the future and how that funding supports more efficient arrangements for local, regional and national policing services. Continuing to administer substantial cost reductions in the next spending round in the same way as this one is likely to place the financial viability of some forces in jeopardy within the next three to five years.⁸
- 8.4 The report also found that police forces across England and Wales have experienced the cuts differently due to variations in local taxation and previous budget restraints. Some police forces are doing well in the face of the cuts.⁹ The magnitude of the reductions facing police forces in England and Wales, however, will no doubt have an adverse effect on the amount of work that can be done by police forces to prevent crime and protect the public.

⁷ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 34)*

⁸ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 34)*

⁹ <http://www.thebureauinvestigates.com/2013/07/13/revealed-police-forces-are-taking-up-to-30-longer-to-react-to-999-calls> (last accessed 26 August 2014)

9. National Picture

- 9.1 The response to the funding challenge has not been without adverse effects on some important areas of policing. Her Majesty's Inspectorate of Constabulary found, in particular, that neighbourhood policing risks being eroded in some places.
- 9.2 By March 2015, the total police workforce (officers, staff and PCSOs) is planned to be reduced by 34,400 (since March 2010), meaning that three posts in every 20 would have been removed (a planned 16,300 fewer police officers than in 2010). These plans estimate that by March 2015 there will be 127,500 police officers in England and Wales - fewer police officers than at any other time in the last decade.¹⁰
- 9.3 Police forces have worked hard to prioritise savings in goods and services (such as supplies, uniforms, estate and vehicles) whilst seeking to protect officer and police staff posts. 29% of planned savings over the spending review period come from these non-pay costs, although they make up approximately 20% of the overall policing cost base.¹¹
- 9.4 Despite the savings in goods and services, the scale of funding reductions means that police forces still have to reduce the size of their workforces considerably. Forces are restructuring and reconfiguring how they carry out their work in order to protect, although not necessarily preserve, the front line.¹²

¹⁰ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Pages 33-34)*

¹¹ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 34)*

¹² HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 33)*

10. Local Picture

Key Findings:

- **Humberside Police has identified the need to save £34.4m, which is 16% of its overall budget**
- **By March 2015, the number of police officers in Humberside will have reduced by 24% (495 fewer police officers) since 2010 and there are plans for a further reduction of 210 police officers over the next four years**
- **Planned police staff reductions within Humberside Police will equate to 17% (282 fewer staff) than in 2010 and there are plans for a further reduction of 591, 50% of which will be achieved through enhanced voluntary redundancies**
- **In addition, over the same time period there have been reductions to the number of Police Community Support Officers (PCSOs) with 69 fewer than in 2010**
- **Her Majesty's Inspectorate of Constabulary has expressed concerns that Humberside Police has not done enough to achieve a sound financial position for the future**

- 10.1 As part of the spending review (between March 2011 and March 2015) Humberside Police identified the need to save £34.4m. As a proportion of its overall budget (£180m), this saving requirement of 16% is slightly lower than most other forces; however, “Her Majesty's Inspectorate of Constabulary considers that Humberside Police still faces a particularly difficult challenge.”¹³
- 10.2 Humberside Police is currently undergoing a restructure (‘Building the Future’) in order to meet the demands imposed by the spending review. The new structure will require a reduced number of both police officers, police staff and Police Community Support Officers (PCSOs).
- 10.3 Her Majesty's Inspectorate of Constabulary report states that by March 2015, there will be 1,563 police officers (a reduction of 495 police officers since March 2010). The national average is 11%; the reduction in Humberside is 24%. An additional 210 police officer posts are still to be reduced (between 2015 and 2018) and it is not clear which areas of Humberside or which specific police services will be adversely affected by this planned reduction¹⁴.
- 10.4 The scale of planned police staff reductions, however, is much higher (591), which Her Majesty's Inspectorate of Constabulary advises is not possible through turnover and, therefore, Humberside Police is looking to achieve 50% of this reduction by voluntary enhanced redundancy. The rest is to be achieved by redeployment, efficient management of the establishment (via a recruitment freeze) and, potentially, a small number of compulsory redundancies.¹⁵
- 10.5 Her Majesty's Inspectorate of Constabulary has expressed concerns that Humberside Police has not yet done enough to achieve a secure financial position for the future. Humberside Police has continued to accumulate reserves with the express intent of using them to cushion the impact of funding reductions. Reserves that stood at 17% of total spending in 2011/12 are expected to fall to 12% by 2014/15. Whilst this means that some of the funding gap has been bridged using an injection of one-off reserves,

¹³ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 9)*

¹⁴ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 12)*

¹⁵ HMIC: *Responding to austerity: Humberside Police July 2014 (Pages 9 and 12)*

recurring savings needed to meet the financial gaps have not been achieved. In the long term this is not sustainable.¹⁶

- 10.6 The saving requirements for 2014/15 are £12.2m but planned savings are only £6.8m (a gap of £5.5m to be bridged by reserves to balance the budget). In 2015/16, there is a savings requirement of £16.3m with planned savings of £12.0m. This savings target is expected to be met from reductions in police officer and staff posts and the implementation of a new operational model.
- 10.7 Her Majesty's Inspectorate of Constabulary is not yet clear, however, which functions will be directly affected by these reductions and, therefore, what the impact will be - which mirrors the Panel's concerns. The Panel is further concerned that without information or a clear plan to show otherwise, the East Riding will be disadvantaged disproportionately and crime levels will increase, a situation that might be avoided through consultation and collaboration with partners and local communities.¹⁷
- 10.8 Because of the scale of savings required now and in the near future, changes need to be made at an unprecedented pace. The medium-term financial strategy 2014/15 - 2018/19 sets out how Humberside Police intends to meet its shortfall in budget; however, even with the continuing use of reserves to balance the budgets, these reductions in spending are dramatically higher than anything Humberside Police has previously achieved.

¹⁶ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 10)*

¹⁷ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 10)*

11. HUMBERSIDE POLICE FORCE CURRENT STRUCTURE

Key Findings:

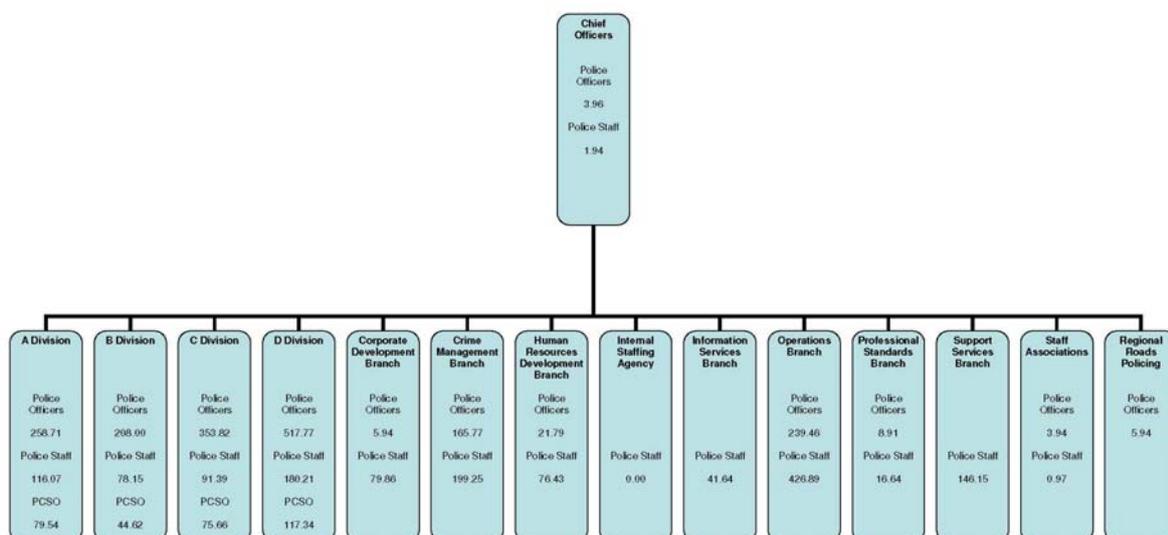
- There are currently three divisions within Humberside Police (on the South Bank two divisions are merging into one)
- Her Majesty's Inspectorate of Constabulary has identified the following reduction in policing numbers over the period of March 2010 to March 2015

	31 March 2010 (baseline)	31 March 2015	Change	Force change %	Change for England and Wales %
Police officers	2,058	1,563	-495	-24%	-11%
Police staff	1,648	1,366	-282	-17%	-17%
PCSOs	317	248	-69	-22%	-22%
Total	4,023	3,177	-846	-21%	-14%
Specials	341	470	129	38%	44%

11.1 Humberside Police is led by Chief Constable, Justine Curran, who took up her appointment with Humberside Police in April 2013. The Chief Constable is responsible for all operational policing matters across the Humberside Police area. The Police and Crime Commissioner for the Humberside Police area is Matthew Grove, who was elected and came into office in November 2012.

11.2 The current Humberside Police structure has three divisions, together with a number of specialist branches and units as follows:

South Bank (combined)		North Bank	
A Division	B Division	C Division	D Division
North Lincolnshire	East Lincolnshire	North Lincolnshire	East Riding of Yorkshire Kingston upon Hull



File = full time equivalent

¹⁸ <http://www.humberside.police.uk/about-us> (last accessed 29 August 2014)

- 11.3 Humberside Police has two control rooms, one for the North Bank and one for the South Bank. Each Division is provided with its own support and specialist units and there are a number of centralised specialist units, such as crime, operations and protecting vulnerable people. There are currently 36 police stations across the Humberside Police area, 14 of which are in the East Riding.
- 11.4 By March 2015, it is estimated there will be 1,563 police officers across the Humberside Police area.¹⁹

	31 March 2010 (baseline)	31 March 2015	Change	Force change %	Change for England and Wales %
Police officers	2,058	1,563	-495	-24%	-11%
Police staff	1,648	1,366	-282	-17%	-17%
PCSOs	317	248	-69	-22%	-22%
Total	4,023	3,177	-846	-21%	-14%
Specials	341	470	129	38%	44%

¹⁹ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 15)*

12. Crime Figures for the East Riding and Humberside

Key Findings:

- In 2013/14, crime was up 4.9% within the Humberside Police area
- The East Riding police division (Division C) has the highest population at 335,887, followed by Hull with 257,204 residents
- In 2013, there were 13,188 recorded crimes in the East Riding of Yorkshire
- The East Riding of Yorkshire is currently covered by 354 police officers
- If police officers were to be distributed across the Humberside area based on percentage of crimes per division, C Division (which covers the East Riding of Yorkshire) should have a minimum of 371 police officers and many more than this if the distribution of police officers was based on the geographical size of each authority

- 12.1 Overall, crime was up 4.9% during 2013/14 within the Humberside Police area. Crime levels are still lower than two years before and considerably down on ten years ago although violent crime rose 9.8% in 2013/14²⁰. When considering crime figures for the Humberside area, however, consideration should be given to a report from Her Majesty's Inspectorate of Constabulary in which it is advised that the integrity of Police crime data needs significant improvement.
- 12.2 This raises a key issue in comparing crime levels year-on-year, leaving the Panel unable to ascertain whether the fall in crime in recent years is due to improved policing and co-operation from partners, or instead, due to the under-reporting of crime as found by the Inspectorate. HMIC reported that 27% of incidents reported by the public to Humberside Police, which the Inspectorate identified as crimes, had not been recorded by Humberside Police as a crime.²¹
- 12.3 Detailed crime figures for 2013/14 are not yet available; therefore, the Review Panel report makes reference to crime figures for the last two calendar years (2011/12 and 2012/13) in order to give an overview of the current levels of crime over the whole of the Humberside Police Force area.
- 12.4 Comparison tables have been used to show how crime in the East Riding (C Division) compares with the other three Divisions which make up the Humberside Police Force area. Crimes have been broken down by Home Office Category to give a complete picture of the types of crime occurring in each Divisional area.
- 12.5 For comparison purposes, data for the last two calendar years has been used in all areas of the report. The thematic maps use only the last calendar year's data (2013). The cells highlighted in the tables as *ITALICS* represent the lowest figures and the cells highlighted as **BOLD** the highest figures.

²⁰ Office of the Police and Crime Commissioner for Humberside: Annual Report 2013/14 (Page 3)

²¹ HMIC: Crime Data Integrity: Inspection of Humberside Police August 2014

- 12.6 The East Riding (C Division) has the highest population in the Humberside Police Force area, compared with the other three Divisions. It also covers the largest geographical area.

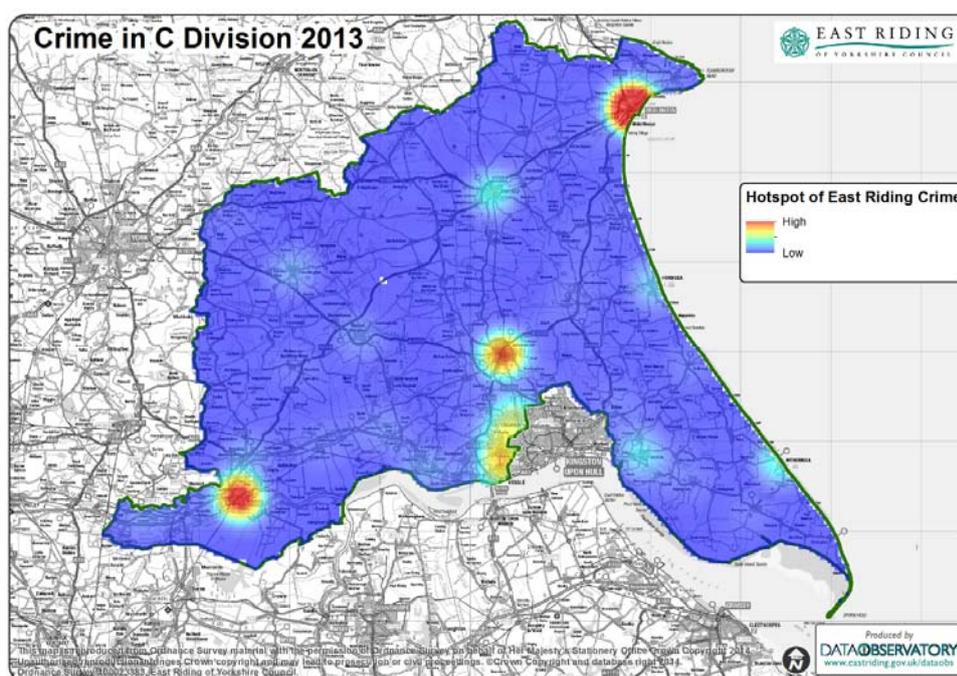
Division	Population ²²	Hectares ²³	% of Population	% of Hectares
A Division - North East Lincolnshire	159,727	19,184	17.3%	5.5%
B Division - North Lincolnshire	168,372	84,631	18.3%	24.1%
C Division - East Riding of Yorkshire	335,887	240,768	36.5%	68.5%
D Division - Kingston Upon Hull	257,204	7,145	27.9%	2.0%
Humberside Police Force Total	921,190	351,728	100%	100%

Recorded Crimes²⁴

- 12.7 The East Riding has the third highest number of recorded crimes in both years within the Humberside Police Force area. Kingston upon Hull (D Division) has the highest levels.

Division	Recorded Crimes 2012	Recorded Crimes 2013	% of Force 2012	% of Force 2013
A Division - North East Lincolnshire	14,155	14,417	22.2%	22.9%
B Division - North Lincolnshire	11,279	9,986	17.7%	15.9%
C Division - East Riding of Yorkshire	14,073	13,188	22.0%	21.0%
D Division - Kingston Upon Hull	24,391	25,337	38.2%	40.3%
Humberside Total	63,898	62,928	100.0%	100.0%

- 12.8 The map below shows the hotspot areas for crime within the East Riding for 2013. The main hotspot areas were in Bridlington, Goole, Beverley and the West Hull villages.



²² ONS Mid 2012 Population Estimates

²³ ONS Census 2011. A hectare equates to 10,000 square metres (100m by 100m)

²⁴ Humberside Police data, downloaded on February 6th 2014 for the period January 1st 2012 to December 31st 2013 (based on the committed from dates).

Recorded Crimes Per 1,000 Population²⁵

- 12.9 The East Riding had the lowest number of recorded crimes per 1,000 population in both years within the Humberside Police Force area. Kingston upon Hull (D Division), as it did for the total number of crimes, has the highest levels.

Division	2012	2013
A Division - North East Lincolnshire	88.62	90.26
B Division - North Lincolnshire	66.99	59.31
C Division - East Riding of Yorkshire	41.90	39.26
D Division - Kingston Upon Hull	94.83	98.51
Humberside Total	69.36	68.31

- 12.10 The East Riding has a relatively low crime rate per head of population, but crime levels in the East Riding are similar to those in North East Lincolnshire and are significantly higher than North Lincolnshire (see table at paragraph 12.6).

Theoretical Crimes per Police Officer

- 12.11 Based on the percentage of crimes per division we can distribute the number of police officers across the Humberside to highlight where officers would be located if proportionally distributed. C Division would have the third highest pull on resources.

Division	Proportion of Police Officers
A Division - North East Lincolnshire	405.74
B Division - North Lincolnshire	281.04
C Division - East Riding of Yorkshire	371.15
D Division - Kingston Upon Hull	713.07
Humberside Total	1,771.00

- 12.12 The following table shows that there is one police officer for every 904 residents in the East Riding, compared to one police officer for every 360 residents in Hull. In terms of area, a police officer in the East Riding has to respond across distances that are 60 times greater than a police officer in Hull, which affects response times. If the allocation of police officers was based on the number of residents per officer by percentage of crime, then the allocation to East Riding C Division would be significantly higher than the other divisions.

Division	Residents per Police Officer	Hectares per Police Officer
A Division - North East Lincolnshire	393.67	47.28
B Division - North Lincolnshire	599.11	301.14
C Division - East Riding of Yorkshire	904.98	648.70
D Division - Kingston Upon Hull	360.70	10.02
Humberside Total	520.15	198.60

²⁵ ONS Mid 2012 Population Estimates

- 12.13 The Panel was informed that from 1 April 2008, the East Riding benefited from 430 police officers²⁶ and the Panel has, therefore, two main concerns; firstly, police officer numbers may have fallen disproportionately over the last six years, when compared to other Council areas and secondly, whether there are sufficient numbers police officers to respond in a timely manner across the vast size of the East Riding and to its level of crime.
- 12.13 It is understood that the East Riding of Yorkshire is currently covered by 354 police officers, which is lower than the numbers estimated in both paragraphs 12.10 and 12.11 above. With the current level of police officers, over 13,000 crimes were recorded within the East Riding in 2013. As a result, the Panel raised concerns that any reductions in police officers could delay response times, lead to higher crime rates and thus be detrimental to the East Riding.

²⁶ *Humberside Police: Local Policing Summary 2007-2008 : East Riding, page 7*

13. 'BUILDING THE FUTURE' - HUMBERSIDE POLICE FORCE REDESIGN

Key Findings:

- 'Building the Future' is the Humberside Police plan to redesign services so it can operate with fewer police officers
- The new policing model will abolish the three divisions and will be based on four force-wide command areas and a series of 'enabling services'
- Main elements of the redesign include improved call management, use of what is called "predictive" technology and the streamlining of processes

13.1 'Building the Future' is Humberside Police Force's plan to change the way it provides policing and will operate with fewer police officers and staff.

13.2 The new Humberside Police model will be structured around four force-wide 'Command' areas and a series of 'Enabling Services':

The Command Hub	All public contact, duty system, emergency planning - the Hub will have the Control Centre
Communities Command	Neighbourhood policing, hate crime, casualty reduction and alcohol intervention programme etc.
Operations Command	Immediate and high priority response, serious crime response, speed enforcement etc.
Specialist Command	Dogs, surveillance, cyber-crime, sex offences etc.
Enabling Services	Estate services, finance, HR, legal services etc.

13.3 The Humberside Police transformation is programmed for design and implementation over the next seven months, with a scheduled launch date of 3 April 2015. Some aspects of the 'Commands' have already been implemented (such as Humberside Police's Public Protection Unit) and some are being phased in gradually, but the vast majority are still in the design phase and details about how these will work in practice were not available at the time of writing this report.

13.4 Humberside Police has identified that the main elements of its change programme during the current spending review are:

- Changes in business support in areas such as human resources and finance;
- Better alignment of resources to demand;
- Collaboration with other forces;
- Streamlining processes and reducing bureaucracy; and
- Improving the way that operational support functions are provided.

13.5 The response by Humberside Police to future financial pressures will include:

- Improved call management;
- Use of predictive technology;
- Improved IT to streamline processes;
- Collaboration with other parts of the public sector; and
- Improvement in mobile data to increase productivity of police officers on the front line.

14. THE PANEL'S RESPONSE TO HUMBERSIDE POLICE'S 'BUILDING THE FUTURE' PROPOSALS

14.1 Consultation

Key Findings:

- The Panel feels that insufficient consultation and engagement has taken place with partners and local communities
- The Panel is disappointed that the Chief Constable and Office of the Police and Crime Commissioner declined to fully take part in this review and attend meetings
- The Office of the Police and Crime Commissioner has not made arrangements to formally consult with all local communities in the East Riding affected by the planned changes in policing

- 14.2 The Panel considers it reasonable to expect a significant level of engagement and public consultation equivalent to the level of change given the radical change to policing due to take place across the Humberside area by April 2015.
- 14.3 Considerable levels of engagement are not unusual amongst partners in the East Riding. When, for example, Humberside Fire and Rescue Service proposed large scale changes to its services, it carried out large scale consultation events, including presenting in detail to the Council's former Safer and Stronger Communities Overview and Scrutiny Committee. The Committee responded to the consultation and as a consequence, along with other consultation responses from other partners and the public, Humberside Fire and Rescue Service took into consideration the feedback and altered its plans according to public demand. Likewise, when the Council undertook a review of its car parks, a series of roadshows and public events took place across the East Riding allowing residents to put forward their views, concerns and suggestions.
- 14.4 Aside from the Office of the Police and Crime Commissioner's rolling programme of consultation (street surgeries, focus groups and social media) it appears to the Panel that there will be no such large scale consultation/engagement exercise. Instead, the Panel felt that information was being released by Humberside Police to partners and the public in a somewhat ad hoc manner which was impeding proper consultation from taking place.
- 14.5 As a key partner, the Panel felt that the Council should expect to receive a high level of engagement from Humberside Police on its redesign plans. Since January 2014, Council officers had been invited to attend a few briefing sessions on Humberside Police's 'Building the Future' plan. Officers felt, however, that the information provided at these meetings was limited, despite the fact that a number of the changes to Humberside Police's redesign would require the help and cooperation of local authorities. Officers informed the Panel that this would be difficult to achieve if the local authorities were unable to take part in in-depth discussions with Humberside Police and expressed the hope that future briefing sessions would provide more comprehensive and detailed information.
- 14.6 The Panel felt that all communities should have a chance to comment on the planned changes to the way policing in the East Riding and other parts of the Humberside Police area is delivered. Feedback from town and parish councils and voluntary groups in the East Riding shows that they were unaware of the policing changes. The Panel stressed the importance of Humberside Police ensuring comprehensive engagement, consultation and feedback with all partners and stakeholders.

- 14.7 In an article relating to a rise in the precept, posted on the Office of the Police and Crime Commissioner’s website 31 January 2014, the Police and Crime Commissioner was quoted as saying, “I asked the Chief Constable to redesign a sustainable policing service for the area, and her plans are well advanced. We will make sure that public and partners are informed as these plans develop.” As of September 2014 when the review came to a conclusion, the Panel felt it was evident that Humberside Police had failed to ensure that the public and partners were being kept informed of the reforms process in light of the view that the changes were "well-advanced".
- 14.8 At the Humberside Police and Crime Panel meeting of 30 June 2014, the Police and Crime Commissioner stated that the Chief Constable had visited and had been working with local authorities on the Force redesign. This has not been the case with East Riding of Yorkshire Council, with the Chief Constable declining to attend this Review Panel and answer the questions set, despite a number of invitations being issued. Likewise, the Office of the Police and Crime Commissioner offered an invitation to all local authorities to speak with them on the restructure. The Panel was disappointed that in light of this open invitation, the Chief Constable had declined to speak to the Panel on a number of occasions, as her input would have been greatly appreciated.
- 14.9 The Panel compiled a series of questions it wished to pose to the Police and Crime Commissioner (see Appendix 2) but the decision of the Police and Crime Commissioner not to engage with the Council’s review has left the Panel with a large number of unanswered questions and few assurances that the changes brought about by the Humberside Police redesign will not be to the detriment of East Riding residents.
- 14.10 Rather than working with partners to help transform policing for the benefit of the community, the Panel feels that the ‘Building the Future’ plan will be presented as a *fait accompli* with the expectation that partners will ‘fall in-line’. The public sector is in a time of shrinking budgets, and as a result, the need for partnership working, which is both cost effective and necessary, is more important than ever. The Panel called into question the level of partnership working and engagement that was taking place on financial and resource planning, particularly with the East Riding. Her Majesty’s Inspectorate of Constabulary has also raised the same issue about Humberside Police not consulting the public, this time over the Police’s policy decision not to attend all reports of crime and incidents in the area.²⁷

Recommendation 1	
Primary Recommendation	That Humberside Police fully engage with East Riding of Yorkshire Council on the Force’s redesign plans and any impact this may have on the work of the Council so that the two organisations can work in partnership in an open and transparent nature for the benefit of East Riding residents.

Recommendation 2	
Consultation	That a timetabled programme of consultation be developed on Police service changes with all local communities in the East Riding, which includes details of how feedback will be used to shape Humberside Police’s transformation plans.

²⁷ HMIC: *Core business: An Inspection of crime prevention, police attendance and use of police time* (letter dated 3 September 2014)

15. Implementation Timeframe for 'Building the Future'

Key Findings:

- **The Panel is concerned that the "Building the Future" redesign process is taking place over too short a time scale which is impeding proper engagement and consultation from taking place**

- 15.1 HMIC has raised concerns that Humberside Police has not yet done enough to achieve a secure financial position for the future. Whilst this is fully acknowledged by the Panel, the Panel feels that Humberside Police is making changes at an unprecedented, and in the Panel's view, unnecessary pace.
- 15.2 It is not evident to the Panel why the significant changes to Humberside Police must be implemented in such a short timeframe (by April 2015), given the nature of change. Whilst the Panel appreciates that plans need to be put in place quickly to provide assurances that the savings can be achieved without any risk of impact on service provision to the public, the Panel feels that by implementing its redesign plans in such a short period of time, Humberside Police is jeopardising its operations and financial sustainability in the long term.
- 15.3 The Panel recognises that bringing about a shift in the organisational culture is critical to the success of introducing the new way of providing policing to the Humberside area; however, cultural change is notoriously difficult to implement in a short time frame and therefore casts doubt as to whether this will be achieved within Humberside Police's timescales.
- 15.4 It is essential with such large scale change that all aspects of the plan are tested and that implementation of each Command should not take place until Humberside Police and its partners are satisfied that it will be effective in operation. The Panel expressed concerns that by implementing all aspects of each of the four Commands and Enabling Services simultaneously, this would create additional problems. The Panel strongly urges the Chief Constable and the Office of the Police and Crime Commissioner to consider the cumulative impact and to delay the start date of change and to consider a phased implementation to the redesign process.

Recommendation 3

Implementation Timeframe for 'Building the Future'	That the Humberside Police redesign process be implemented over a longer period of time in order to enable a phased approach to be taken in collaboration with all partners and local communities.
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16. Reserves and Precept

Key Findings:

- It is not clear where the additional revenue gained by raising the police precept by 1.99% and the £32m held in reserves will be used by the Office of the Police and Crime Commissioner to achieve adequate levels of policing in the East Riding.
- The Police and Crime Commissioner holds £32.972m in reserves

- 16.1 As stated in the report 'Police Precept for 2014/15 and Medium Term Financial Strategy 2014/15-2018/19' presented to the Police and Crime Panel on 4 February 2014, the Office of the Police and Crime Commissioner holds £32.972m in reserve.²⁸ Whilst some of this reserve has been ear-marked to help bridge the gap and balance the budget over the next two to three years, the Panel asks that the Office of the Police and Crime Commissioner considers using a greater portion of the reserve to help reduce the planned staff deletions over the next few years.
- 16.2 Despite the sizeable reserve and the potential for in year underspend, the Office of the Police and Crime Commissioner raised the precept by 1.99%, leaving residents to partly fill the budget deficit. The Panel felt that East Riding residents should not be expected to bear the brunt of precept increases, particularly if resources and police stations were to be reduced/withdrawn across the East Riding and without full consultation on the police changes.
- 16.3 The Police and Crime Commissioner has been quoted saying, "Humberside Police belongs to local people, it is not my police force or the Chief Constable's, it is yours. The precept is the taxpayers' investment in that service." The Panel considered the perception of an East Riding resident who might well resent paying an increased precept whilst at the same time seeing a possible reduction in police officers, stations and funds to local communities. The Panel felt that it was only reasonable that East Riding residents receive value for money and an equitable service in comparison to the other local authority residents.
- 16.4 Whilst the public appreciates the need for an effective response by Humberside Police to meet the national financial constraints all public sectors face, it must be undertaken without adversely affecting the level of policing paid for by the public.

²⁸ Report to the Police and Crime Panel 4 February 2014: Police Precept for 2014/15 and Medium Term Financial Strategy 2014/15 - 2018/19 (Page 23)

17. IT and Mobile Technology

Key Findings:

- A trial has shown that officers spend more time on patrol when they have access to mobile technology
- Humberside Police plans to use hospital, retail premises and residents' Wi-Fi connections when visiting their homes
- The government Public Services Network scheme may be of benefit to Humberside Police as they look to embrace technological advances to bring about efficiencies
- There was insufficient information to give the Panel confidence that an IT and mobile solution could be implemented reliably and securely by March 2015 for frontline police officers particularly when visiting remote locations in the East Riding where Broadband and signal strength remains an issue.

- 17.1 Information Technology has enormous potential to enable systems and processes to be automated and for customers to be able to self-help. The emergence of mobile technology allows officers to perform more tasks and activities while remaining visible in the community.
- 17.2 In February 2014, the Office of Police and Crime Commissioner was jointly awarded with South Yorkshire Police a £1m funding grant from the Home Office to be used solely for the development of mobile technology. This included tablet devices and lightweight laptops, to free-up police officers and PCSOs from administrative duties, so they could spend more time on the beat protecting local communities.
- 17.3 A trial using the new mobile technology found that officers spent up to two hours extra per shift on patrol when they had the mobile technology with them. Building on the success of the trial and using further Home Office funding, Humberside Police intends to roll out the programme of mobile technology across the whole of the Humberside Police Force area.
- 17.4 A large part of the 'Building the Future' plan is heavily reliant on Humberside Police being able to increasingly use mobile technology. The Council is well placed to understand the difficulties of redesigning services to make better use of technology through the work and research that has taken place as part of the Transforming East Riding business transformation programme. It quickly became apparent to the Council that this was a highly complex area requiring effective testing and analysis to determine how technology can be best used to increase effectiveness and efficiency of services without isolating those customers who cannot or are unwilling to use non-traditional communication methods. It is also unclear to the Panel what Humberside Police vision for its virtual customer service centre is and how this compares to its current communication and customer relation strategy.
- 17.5 The Panel is also concerned that Humberside Police will become overly reliant on IT and mobile technology solutions to help produce the significant savings required and maybe overstating the productivity benefits, particularly if mobile technology does not function properly in areas of rural East Riding due to poor Broadband and signal coverage.
- 17.6 Reservations were also expressed by the Panel over the fact that Humberside Police was considering using residents' Wi-Fi connections when visiting. This would require residents to divulge their Wi-Fi password to officers which could create fear of security and data protection risks.

- 17.7 The Public Services Network (PSN) is creating one single network that will result in a more cost-effective and efficient ICT infrastructure. PSN provides a secure private internet for organisations across central government and the wider public sector, replacing hundreds of disparate and disconnected infrastructures.²⁹ The PSN will substantially reduce the cost of communication services across UK government and enable new, joined-up and shared public services for the benefit of citizens.
- 17.8 The Council is working with Virgin Media Business along with other public services to progress the PSN and the Panel heard that Humberside Police is participating in this project, which will assist the benefits and efficiencies of modern technology. The Panel stressed the need for Humberside Police to work more closely with the Council and other partners to exploit new technology and different ways of working to save money and to create a greater service for residents of the Humberside area.
- 17.9 Finally, serious concerns around the optimistic timescales involved in Humberside Police's redesign programme for IT and mobile working were raised by the Panel, which felt that further consideration of the implications of introducing new technology was required.

Recommendation 4	
IT and Mobile Technology	That Humberside Police and the Council continue to work towards the identification and approval of further opportunities for joint working, particularly through the use of new technology and agile working arrangements where there is merit in doing so.

Recommendation 5	
IT and Mobile Technology	That Humberside Police engage more fully with local public sector partners to exploit the potential that Public Service Networks provide.

²⁹ <https://www.publicservicesnetwork.service.gov.uk> (last accessed 28 August 2014)

18. Reducing Demand & Customer Service

Key Finding:

- **The Panel has serious concerns about the robustness of the data being used by the Police to evidence its view that 44% of calls for a policing response is “waste and failure demand” meaning that residents in their view are inappropriately seeking help from the Police. The Panel would like to scrutinise the Police’s position and ensure the public receive services, and victims the support they require, without being passed from “pillar to post” between police and council services.**

- 18.1 To influence the strategic redesign of Humberside Police, a demand analysis was conducted that included an analysis of ‘calls for service’, called ‘Operation Check’. A snapshot of demand over a single 24 hour period took place in September 2013 to identify ‘true’ demand (what Humberside Police should deal with) and ‘waste and failure demand’ (what Humberside Police should not be dealing with). From this analysis, it was concluded that 44% of demand was not police related but represented, for example, calls for help which should be dealt with by social services or other local authority services. Just over half of the calls (58.9%) were identified as potentially preventable due to inefficient internal processes.³⁰
- 18.2 This same exercise was repeated again in early 2014 and again the analysis showed that 40% of demand had not required a police response. As a result of Operation Check, Humberside Police now aspires to reduce the ‘waste and failure’ demand.
- 18.3 The Panel has reservations over Humberside Police’s findings relating to Operation Check. Members felt that a much wider assessment period needs to be undertaken (taking into account peak periods, such as summer season in Bridlington in order to gather more accurate data and evidence and to ensure a more realistic picture of demand is portrayed).
- 18.4 If indeed it transpires that Humberside Police wishes partners to help reduce its call demand, then open dialogue needs to be undertaken with such organisations. To date no further information has come forth from Humberside Police over its expectations for the Council to respond to Police calls, nor have any discussions been initiated by Humberside Police with the Council to determine how such work streams could and should work.
- 18.5 The relationship between the public and the police is very different to that between the Council and its residents. Whereas residents interact and can relate to the Council on a regular basis (i.e. through the emptying of bins, the stocking up of salt bins, using libraries, repairing roads etc.), the public’s relationship with the police is much more often less frequent. The Panel feels Humberside Police has a challenge ahead in trying to change the way the public view the work of the police and the way the police provide services.

Recommendation 6	
Reducing Demand & Customer Service	That clear procedures are developed and agreed through a joint approach by all relevant partners to customer contact for related services so that communities are clear about who they should contact when in need of help and support.

³⁰ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 19)*

19. Neighbourhood Policing

Key Findings:

- **Currently there are 165 neighbourhood watch groups in the East Riding**
- **The Association of British Insurers states that the likelihood of being burgled in a neighbourhood watch area is 1 in 344; it is 1 in 35 in areas with no neighbourhood watch scheme**
- **The Office of the Police and Crime Commissioner currently provides no funding for neighbourhood watch schemes**

- 19.1 A visible policing presence in neighbourhoods and communities is as important as positive contact between the police and the public, and has consistently been shown to influence public confidence. The value placed by the public on visibility is demonstrated by the findings of the Crime Survey for England and Wales where high visibility was associated with a positive rating of the police.³¹
- 19.2 The Panel understands that there is a significant level of policing activity that is not visible to the public and does not require community-based beat constables. Often these specialists are not visible, operating in plain clothes or utilising covert methods of policing. Nevertheless, publicly visible policing is crucial to delivering an effective local service.³²
- 19.3 Across the country, although forces have worked hard to protect neighbourhood policing, the workload and remit of neighbourhood teams are broadening still further and higher than anticipated reductions of PCSO numbers are occurring. Police forces recognise the value of neighbourhood policing but in the face of continuing budget reductions many forces have commented that their police service would become increasingly reactive (with a focus on responding to 999 calls and investigating crime) rather than preventing and reducing crime. Forces' ability to prevent crime and reduce demand will be seriously undermined if their neighbourhood teams are materially eroded.³³
- 19.4 The Panel was reassured by the Divisional Commander for the East Riding that neighbourhood policing was a key component of the Communities Command and that although full details were not available for sharing with the Panel at the time of writing this report, the East Riding would receive its fair share of resources at a level that would protect and maintain safe communities.
- 19.5 The Panel also welcomed the news that the Neighbourhood Tactical Unit has evolved from the Bridlington Summer Unit and will now see a team of 40 officers deployed around the Humberside Police area as and when there is demand (i.e. in the summer they will be in Bridlington and in winter they will focus on rural areas where hunting and poaching activities take place).
- 19.6 Support for Neighbourhood Watch used to be provided by the Humberside Association of Neighbourhood Watch Groups (HANWaG) and funded by local authorities and the former police authority. HANWaG stopped providing services on 30 November 2010 but in-house support continued to be provided by East Riding of Yorkshire Council using existing resources. In April 2012, the Council established the post of Community and Neighbourhood Watch Support Officer. The post is part-time (25.5 hours as of April 2013) and the post holder is responsible for developing and maintaining the

³¹ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 107)*

³² HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 107)*

³³ HMIC: *Policing in Austerity: Meeting the Challenge July 2014 (Page 36)*

Neighbourhood Watch Network across the East Riding. In May 2012, there were 88 Neighbourhood Watch groups listed in the East Riding - there are now 165 and a further 10 in the process of being set up. Many were newly established groups, others were lapsed groups that had been rejuvenated and a few had re-emerged in response to recent publicity.

- 19.7 The Council is well placed to continue to maintain and develop Neighbourhood Watch alongside Humberside Police and Humberside Fire and Rescue Service but any plans for further development would need to take into account the level of resource currently available.
- 19.8 The Association of British Insurers (ABI) also states that if you live in a non-Neighbourhood Watch area, the likelihood of being burgled is 1 in 35, whilst the chance of being burgled in a Neighbourhood Watch area falls to 1 in 344.
- 19.9 Local policing should be shaped by local people, who have the local knowledge and know the requirements for that community. Ward, town and parish councillors should have the opportunity to lead discussion in their areas on the police proposals to help shape the level of police services in their local area. Equally the Council must be kept informed of the Force's intentions to reduce any services so that it too can plan accordingly so that residents are not disaffected and remain safe.
- 19.10 The Police and Crime Commissioner, during a meeting of the Corporate and Communities Overview and Scrutiny Sub-Committee on 17 October 2013, welcomed the work of Neighbourhood Watch and acknowledged that this is an excellent tool to reduce crime. The Office of the Police and Crime Commissioner, however, has decided not to provide matching financial support for the Neighbourhood Watch scheme in the East Riding. The Panel was disappointed to learn of this decision as it leaves the Council to fully fund the local scheme, even though the former Police Authority contributed to the cost. In addition, it was an election pledge of the Police and Crime Commissioner for neighbourhood watch groups to take on a greater role, "I am totally committed to Neighbourhood Watch and Neighbourhood Network Groups and want to help them to take on a greater role."³⁴ The Panel would welcome clarity from Humberside Police and the Police and Crime Commissioner over what funding is or will be made available for such neighbourhood schemes.

Recommendation 7	
Neighbourhood Policing	That Humberside Police set out how communities can regularly influence the design and delivery of neighbourhood policing to ensure that their specific needs are met and that this be achieved by consultation with ward councillors and town and parish councils.

Recommendation 8	
Neighbourhood Policing	That the Office of Police and Crime Commissioner reconsiders its decision to not provide match funding for Neighbourhood Watch schemes in the East Riding

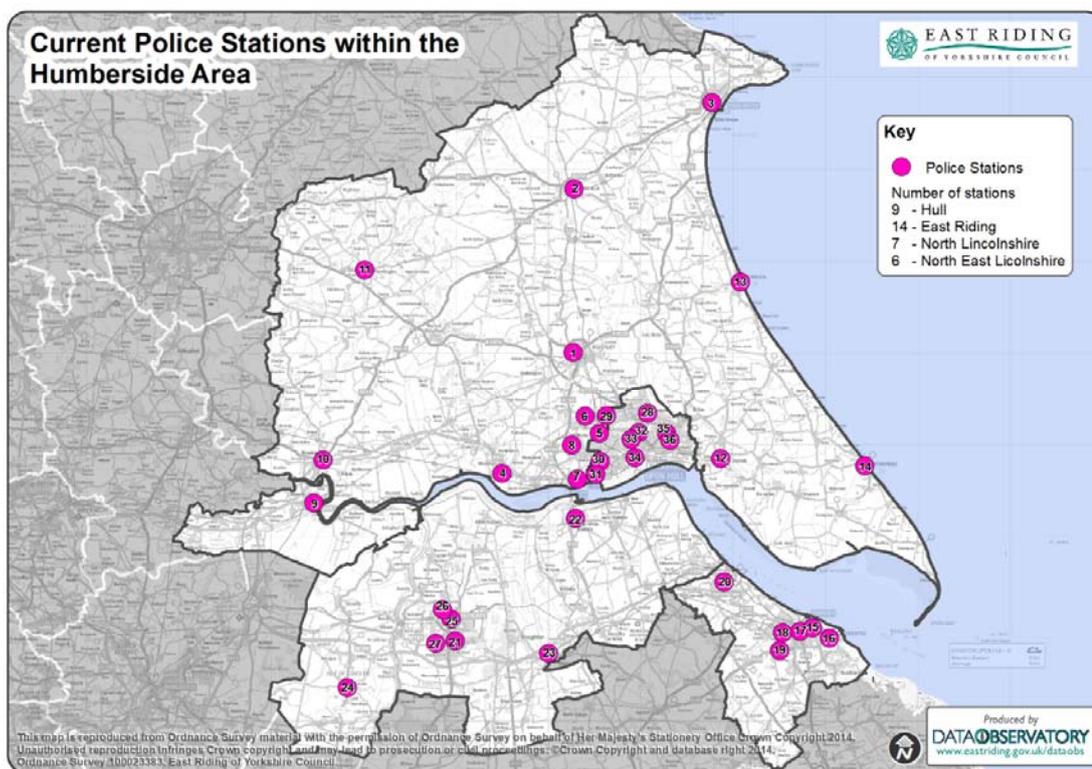
³⁴ Election campaign material titled: Matthew Grove *Working for You*

20. Police Stations, Response Times and Estate Functions

Key Findings:

- There are 36 police stations in Humberside with 30 front counters
- The East Riding has the largest number of police stations but is also the largest geographical area
- Her Majesty's Inspectorate of Constabulary reports that by March 2015, 21 police stations will close
- There are currently 14 police stations in the East Riding and 9 in Hull (13 on the south bank), but no detail was provided to confirm where these 21 police station closures would take place over the next 7 months.

20.1 There are 36 police stations across the Humberside Police. Whilst the East Riding has the largest number of police stations across Humberside Police area (14) it also has the largest geographical area. HMIC predicts that by March 2015 this will reduce to 15 police stations with 26 front counters.³⁵



20.2 A reduction in police stations would appear to be at odds with what the Police and Crime Commissioner stated in his manifesto before being elected, “that no police stations will close under my watch.”³⁶ This was also reiterated at a meeting of East Riding of Yorkshire Council’s Corporate and Communities Overview and Scrutiny Sub-Committee on 23 January 2014 when the Deputy Police and Crime Commissioner addressed the Sub-Committee.

20.3 The East Riding is the largest geographical area across the Force. Hull on the other hand has the smallest geographical area of the Force, yet has nine police stations. The strategic placement of police stations across the East Riding is a necessity, given the size of the area.

³⁵ HMIC: *Responding to austerity: Humberside Police July 2014 (Page 23)*

³⁶ www.policeelections.com/candidates/humberside/matthew-grove/views/

- 20.4 With the current uncertainty over the future of the police stations in Withernsea, Hessle and Driffield, the Panel questioned the timing of the refurbishment of the Bransholme police station (in Hull), at a cost of £710,000.
- 20.5 Police stations are a symbol of a policing presence and the Police and Crime Commissioner has pledged for longer hours and for the public to have the option to contact the police at a police station³⁷. Whilst it is acknowledged that ways by which members of the public want to access police services are changing, there is still the need to balance the requirement for change and modernisation against public perception.

Response Times

Key Findings:

- **Humberside Police is one of just five police forces across the country that does not measure response times in rural areas**
- **Currently, there are 17 police operational bases in the Humberside Police area; there are plans to reduce these to five**

- 20.6 Her Majesty's Inspectorate of Constabulary examines whether forces are taking longer to respond to calls for help from the public as a result of its workforce reductions and other changes designed to save money.
- 20.7 Most police forces set target times for responding to urgent incidents in rural areas under the best value system. However, Humberside Police has not set targets and, therefore, does not monitor response times. The Panel believes this is a crucial flaw in measuring the success of changes to policing because the police cannot monitor performance levels and put into effect improvements where needed, or be held accountable by the public for poor performance. Her Majesty's Inspectorate of Policing is concerned response times nationally are increasing following the funding constraints and it would be sensible to monitor response time performance.
- 20.8 Of additional concern to the Panel is the reduction in operational bases across the Humberside Police area. Currently there are 17 operational bases; however, under the redesign plan these are to be reduced to just five (Bridlington, Goole, Grimsby, Hull and Scunthorpe). The Panel raised concerns that the reduction in the number of operational bases would lead to longer response times with officers having to travel from further afield to attend incidents, a major issue for the East Riding due to its large rural geographic area. Incidents such as the armed robbery which took place in January 2014 at Hornsea post office is still fresh in people's minds which was reported to have lasted 20-minutes before the police arrived. A second robbery occurred also at a post office in Bilton a few weeks later. Both incidents are unsolved and the Hornsea robbery case is now closed.

Estate Functions

- 20.9 The Panel felt that before a reduction of police stations takes place by Humberside Police, there is a need for the Police to develop a detailed estates strategy that will rationalise its use of buildings and complement the new way of providing policing. Humberside Police will then be in a stronger position to determine where police stations and front counters will be required.
- 20.10 Humberside Police's implementation of its redesign comes at a time when the Council and other public sector partners are under similar resources pressures, having to reduce

³⁷ <http://www.humberside-pcc.gov.uk/Matthew-Grove/About-Matthew.aspx> (last accessed 8 September 2014)

budgets and make savings. The sharing of assets can be hugely beneficial and whilst the Council is keen to engage with Humberside Police on this matter, such propositions must be carefully thought through to avoid cost-shunting to Councils. For example, the custody suite in Goole was closed without consultation and this has led to cost increases for the Council because East Riding residents are taken to Scunthorpe instead. When an Appropriate Adult is required to attend interviews with the alleged perpetrator, the Council is required to send an officer, at a much higher cost. The Panel is of the view that closing services, such as the custody suite at Goole, will have a number of wider impacts for partners and additional costs to the public purse. In addition, removing vulnerable people from local health and social care support networks was a unilateral step taken by the Police when it would have benefited from meaningful consultation.

Area of Concern	Recommendation 9
<p>Police Stations, Response Times and Estate Functions</p>	<p>That clear information be provided to the public on the proposed number of police stations in the East Riding and expected response times following implementation of Humberside Police's "Building the Future" redesign plan.</p>

Area of Concern	Recommendation 10
<p>Police Stations, Response Times and Estate Functions</p>	<p>That consultation on the closure of any police stations in the East Riding be undertaken by Humberside Police with the relevant local community and town or parish council and all other partners. No area should be disadvantaged by any proposed police station closures.</p>

Area of Concern	Recommendation 11
<p>Police Stations, Response Times and Estate Functions</p>	<p>That Humberside Police, the Council and other partners consider how the estates function can be better joined up across the East Riding to make more cost effective use of resources such as shared back office and frontline information, advice and guidance.</p>

21. Policing Numbers

Key Findings:

- **East Riding residents contribute the most to the Police precept yet are allocated the second lowest proportion of police officers across the Humberside Police area**
- **The move to centralised services may lead to the loss of localised knowledge and less opportunity to work alongside the public to tackle crime**
- **It is not clear which areas of Humberside will be adversely affected by the additional planned reduction of 210 fewer police officers and 69 police community support officers. The planned police officer reduction in Humberside is the highest in the country. The national average is 11%, Humberside 24%.**
- **HMIC states that Humberside Police intends to reduce the number of PCSOs by 24% by 2015, which is higher than the national average**

- 21.1 East Riding residents contribute the most to the Police precept yet receive the second lowest proportion of police officers across the Humberside Police area. Whilst other areas covered by Humberside Police may warrant more resources due to their high crime rate per head of population, it should be remembered that the East Riding also experiences significant levels of crime that require an appropriate share of resources.
- 21.2 Whilst it can be difficult to determine the exact number of police officers patrolling the East Riding at any one given time, due to shift patterns and other branch units working transiently throughout the East Riding, it is important that the public is satisfied they live in a safe and well-policed area.
- 21.3 With the move to centralise all Commands and disband the four local divisions, it is important that the East Riding is not disproportionately affected and that there are an appropriate number of officers allocated solely to the East Riding. The Panel expressed concerns that the loss of the East Riding Division could be detrimental to local communities as the strong connections that have been established within our local communities and the sharing of information could be weakened. Centralised decisions around the allocation of resources could also lead to a disconnect between the decision makers and the local knowledge that currently exists in C Division.
- 21.4 According to Her Majesty's Inspectorate of Constabulary, Humberside Police intends to reduce PCSOs, often referred to as the life blood of the rural community, by 24% by 2015, thus reducing their ability to work with communities and neighbourhood policing. The Panel calls for reassurances that residents in the East Riding will not face a disproportionate reduction in police officers, PCSOs and police stations compared to other areas, both within Humberside and nationally.
- 21.5 Focusing police resources on major centres such as Hull, Scunthorpe and Grimsby and centralising police stations could make the East Riding vulnerable to being targeted by criminals. There needs to be an effective level of policing in the East Riding for the long term if the Office of the Police and Crime Commissioner is to meet public expectations. It is considered that the East Riding area should have a minimum number of 371 police officers.

Area of Concern	Recommendation 12
Policing Numbers	That Humberside Police provide assurances that the East Riding will not be disproportionately affected by a reduction in policing numbers and resources, and that its local communities remain safe and protected in the future.

22. RESPONSE FROM EAST RIDING OF YORKSHIRE COUNCIL STAKEHOLDERS

22.1 The following responses were made by key stakeholders within the Council and many of the points made echo the concerns of the Panel:

- Key Elected Members have not been privy to any detailed information or opportunities to feedback on the proposals being put forward by the Police which is a major concern due to the nature and scale of the proposed changes.
- The public expects an effective response from the Police, as a public sector organisation, to meet the national financial constraints we are all facing. However the response should not adversely affect the level of policing the public pays for. There is concern that the changes will be presented as a 'fait accompli' rather than for true consultation.
- A critical issue for the East Riding is whether residents having paid more for their policing in the Humberside area year on year will end up having fewer police officers and police stations in rural communities and receive a worse service than other areas paying less. East Riding residents will want assurance that their local towns and villages will not face a disproportionate cut in police officers, PCSOs and police stations compared to other areas.
- There is concern that focusing police resources to major centres could make the East Riding a soft target for criminals with slow emergency response to crime taking place given the size of the East Riding area. The level of service that rural communities will have is particularly concerning as communities will lose their local single point of contact if PCSO numbers are reduced and existing strong connections with local communities could be weakened.
- There needs to be clarity about what functions the police will stop funding or doing and what they will continue to support, especially as there is concern that the Council will have to fill more gaps which it cannot plan or budget for if not informed about changes that will impact on services. For example, there needs to be clarity about what functions the police will stop funding or supporting, for example ASB.
- There needs to be a balance between the need to reduce staff and public perception, particularly as the public measures police performance largely through visibility of police on the street rather than through performance data.
- There is concern that the reduction of civilian staff levels will put back office functions onto front line staff taking up police officer time when they should be out protecting the public.
- The wider impact that the loss of jobs has on the local economy also needs to be strategically considered. The police are already working on losing 495 jobs by March 2015 and the additional 801 reductions add up to almost 1,300 jobs lost for the local area, at a time when there are rising levels of violent crime, robbery and burglary in the East Riding.
- To rush into the changes without meaningful consultation is high risk. It is recommended that the Police Commissioner formally consults the public and gives all residents an opportunity to have their say before implementing the changes and

considers phasing them towards the end of the financial planning period. This will give the police force and its partners, including the Council, the time to discuss and adapt to any proposed changes.

23. CONCLUSION

- 23.1 All public sectors are experiencing similar pressures to make savings in order to achieve the necessary reductions in their budgets. With approximately 80% of policing budgets spent on staffing costs, it is unsurprising that Humberside Police must make its savings by reducing the number of police officers, PCSOs and police staff.
- 23.2 The Panel fully appreciates the huge financial pressure Humberside Police is under to reduce its budget and make the necessary savings; indeed, the Council is in a similar position in terms of the need to make substantial savings to its budget. The Panel has concerns, however, as does Her Majesty's Inspectorate of Constabulary around the sustainability of Humberside Police's long term financial planning and seeks clarification and earlier notification of funding for partnership activities.
- 23.3 The scale of change set in motion by Humberside Police's 'Building the Future' plan is unprecedented in its history. For such a radical shift in operations it would seem to the Panel that the redesign process is taking place at undue haste, with an ambitious implementation date of April 2015. The Panel urges Humberside Police to implement its redesign plan over a phased period, allowing for greater analysis and time to streamline services and allowing for a monitoring period and feedback from the public.
- 23.4 The new Humberside Police model provides a fundamental shift away from the traditional Divisional Command structure which currently takes into account the differing geography, rurality, demography and deprivation across the Humberside area. The creation of a new 'one-shoe-fits-all' approach, which will no longer be tailored to local communities with their diverse needs across Humberside raises concerns, particularly as it will lead to the loss of vital local knowledge that officers in Humberside Police have built up over time.
- 23.5 The Panel has been disappointed by the lack of information and engagement on Humberside Police's and the Police and Crime Commissioner's 'Building the Future' plan. In order to ensure a smooth transition and to ensure that crime and disorder levels do not increase in both the East Riding and the rest of Humberside Police area, Humberside Police must work in an open manner with the Council so that resources and finances can be planned for and allocated as necessary. The Panel requests that Humberside Police fully engages and works in conjunction with the Council in a transparent manner during its redesign process.
- 23.6 The information gathered and supplied by Humberside Police to date has left the Panel with more questions than answers. The Panel seeks assurances from Humberside Police that the East Riding will not be disadvantaged by the new policing model for Humberside.

Recommendation 1	That Humberside Police fully engage with East Riding of Yorkshire Council on its redesign plans and any impact this may have on the work of the Council, so that the two organisations can work in partnership in an open and transparent nature for the benefit of East Riding residents.
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TABLE OF ABBREVIATIONS AND TERMS

ABC	Acceptable Behaviour Contract
ABI	Association of British Insurers
ASB	Anti-Social Behaviour
ASBO	Anti-Social Behaviour Order
DIP	Drugs Intervention Programme
HANWaG	Humberside Association of Neighbourhood Watch Groups
HMIC	Her Majesty's Inspectorate of Constabulary
HMP	Her Majesty's Prison Service
IT	Information Technology
MARAC	Multi-Agency Risk Assessment Conference
ONS	Office for National Statistics
PCC	Police and Crime Commissioner
PCSO	Police Community Support Officer
PODAS	Prevention of Domestic Abuse Service
PSN	Public Services Network
YOT	Youth Offending Team

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ACKNOWLEDGEMENTS

Officers of East Riding of Yorkshire Council

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Paul Bellotti	Head of Housing, Transportation and Public Protection
Nigel Brignall	Manager of Anti-Social Behaviour Team
John Compton	Service Redesign Manager
Brigitte Giles	Head of Resources Strategy
Victoria Hanley	Partnerships & Commissioned Services Strategic Manager
Tina Holtby	Licensing Manager
Max Hough	Manager: Crime and Disorder/Domestic Violence
Darren O'Neill	Targeted Support and Youth Justice Strategic Manager
Jane Stewart	Acting Assistant Democratic Services Manager
Laura Waites	Development and Project Officer
Kevin Woodcock	ICT Business Solutions & Development Manager

Portfolio Holders

Councillor Parnaby OBE	Portfolio Holder for Key Strategic Issues
Councillor Owen	Portfolio Holder for Transformation and Strategic Partnerships
Councillor Cracknell	Portfolio Holder for Community Involvement and Performance

External Contributors

	Humberside Police
Matty Wright	Communications Officer
Chief Superintendent Judi Heaton	Divisional Commander - C Division (East Riding)

Methodology and Scope	
<p>Proposed Review, including desired outcomes and objectives</p> <p><i>An outline of the issue/ subject area which is to be reviewed. The area of activity being proposed should have strategic significance for the Authority.</i></p>	<p>This Review Panel will look at the Police and Crime Commissioner proposals to achieve upwards of a further £30m of cash savings from April 2014 across Humberside over the next four to five years, which are likely to result in substantial changes to the way policing is delivered at the local level in the East Riding.</p> <p>At this early stage of the proposals being developed it has been indicated that the focus will be to target reduced resources to the highest crime areas in Hull, Grimsby and Scunthorpe, and to make better use of police officers' time and staff in partnership with others to ensure performance in tackling crime and disorder does not deteriorate.</p> <p><u>The aim of this Review is:</u></p> <p>To establish the extent of the proposed changes in policing and to consider the impact on the level of crime and disorder and anti-social behaviour in the East Riding in order that it remains a safe place for residents, visitors and businesses.</p> <p>The review relates to the following corporate priorities:</p> <ul style="list-style-type: none"> • Maximising our potential • Supporting vulnerable people, reducing inequalities • Reducing costs, raising performance
<p>Areas the Review Panel wishes to consider</p>	<p>The scope of the review will cover the following areas amongst others that may come to light when the detail of the Police and Crime Commissioner's proposals are finalised:</p> <ol style="list-style-type: none"> 1. Overview of police budget (size etc.), what the main areas of spend are; how Police is funded e.g. income, grants, precepts; what savings mean and how much of £30m relates to proposals being discussed early in the review process 2. An evaluation of the rationale and merits of the proposed changes to policing in the East Riding, and whether or not the impact on villages and towns has been appropriately taken into account 3. To consider whether or not an effective level of policing will be provided across all areas of the East Riding if the proposals are put into effect. 4. To understand and consider the effectiveness of a single divisional commander structure role to cover all of Humberside in place of the current East Riding C Division. 5. The risk from the changes in maintaining a safe place for residents, visitors and businesses and the affect the proposed changes may have on the fear of crime and anti-social behaviour. 6. The risk to the partnership arrangements that are currently in place between Humberside Police, its partners and local communities from centralised control, fewer police officers based in the East Riding and from significantly reducing the public demand and calls for police services. 7. The benchmarking of crime performance data for the East Riding and inspection findings from Her Majesty's Inspectorate of Constabulary including on how the PCC is managing austerity. 8. The efficacy of stopping or reducing grant funding from the PCC to the East Riding for crime prevention initiatives delivered under the community safety partnership, youth offending team, positive lifestyles, and drug intervention programmes. 9. The level of expenditure spent by the Council to tackle crime and disorder, and the level of funding provided by the Council to the PCC. 10. What will be the direct and indirect impacts on the Council to the proposed changes?

Methodology and Scope	
	<ol style="list-style-type: none"> 11. To understand the rationale in closing police stations and the deliverability of relocating the activities carried out in them to other public buildings. 12. A review of the proposal to close custody suites in the East Riding to gain an understanding of the advantages and disadvantages of doing so in transporting people to Scunthorpe, Hull and other locations. 13. The impact of the changes to policing proposed by the PCC on other public agencies and the wider public purse including any additional burdens (or savings in duplication etc.) that might arise from other public services responding instead. 14. The extent to which the East Riding community safety partnership, and the Council's crime prevention initiatives, licensing and the responsibilities of other partners, along with local communities can fill the gap from reduced policing in the East Riding on crime, disorder and anti-social behaviour, be more resilient and protect local communities from crime.
<p>Who should be consulted and involved in the Review</p> <p>Officers from within the authority who have the knowledge to be able to contribute to the review should be identified</p> <p>External Partners, Stakeholders and Agencies who are to be invited to attend a meeting of the Review Panel or can contribute positively to the review should be identified and other consultation to be undertaken should be identified.</p> <p>What use would you wish to make of other consultation, e.g. existing data via feedback/Riding Around, commissioning of surveys (if the review impacts on young people consider using the 'Say Something' website to undertake consultation)?</p>	<ul style="list-style-type: none"> • Relevant portfolio holders <ul style="list-style-type: none"> – Councillor Cracknell – Councillor Owen – Councillor Parnaby • Police and Crime Commissioner, and staff • Chief Constable and her representatives • Police and Crime Panel representatives • National Probation Service and Regional Community Rehabilitation Companies (CRCs) • Prison Service • Magistrates' Court • Home Office • Community Safety Partnership (CSP) • Multi-Agency Public Protection Arrangements (MAPPAs) • Multi-Agency Risk Assessment Conference (MARAC) • Community Partnerships • Renaissance Partnerships • Yorkshire Ambulance Service • Humberside Fire and Rescue Service • Humber NHS Foundation Trust • Council services <ul style="list-style-type: none"> – ASB team – Domestic Violence team – Youth Offending team – Public Health (Drug and Alcohol treatment) – Licensing – Health and Wellbeing Board representatives • Third sector groups <ul style="list-style-type: none"> – Victim Support and other relevant support groups – Neighbourhood Watch, Pubwatch, Farmwatch etc. • Ward councillors • Local parish and town councils • Local MPs • Residents • Young people
<p>Overview and Scrutiny Sub-Committee to monitor review recommendations</p>	<p>Safer and Stronger Communities Overview and Scrutiny Sub-Committee</p>

The Work of the Council in Reducing Anti-Social Behaviour, Crime and Disorder

- 1 The Council has a number of service areas that either works in conjunction with the Police or separately to help tackling and prevent anti-social behaviour, crime and disorder across the East Riding.

Anti-Social Behaviour Team

- 2 The Government has introduced many new powers in the last few years and the Council and its partners work with new and existing legislation to ensure ASB is tackled as effectively as possible. The Council firmly believes in early intervention rather than having to resort to legal action. A number of early intervention tools have been successfully used for a number of years (such as Fairway Letters, Acceptable Behaviour Contracts (ABCs), Anti-Social Behaviour Orders (ASBOs), Individual Support Orders, Parenting Contracts, Parenting Orders, Dispersal Orders, Designated Public Place Orders and Closure Orders)
- 3 In particular, the Fairway to ASBO process, which has been in place since 2008 and was written for the East Riding works very well. The team has a good working relationship with the Police, information is shared frequently and the team meet on a monthly basis through the Neighbourhood Policing team. It is likely that the Fairway to ASBO process will become the model for the whole Humberside Police area upon implementation of the Humberside Police redesign.
- 4 The ASB team was only notified in May 2014 by the Police and Crime Commissioner about of the level of funding for this financial year; which reduced by 6% on the previous year. This created significant problems in terms of forward planning and staff resource. Core funding from the Police and Crime Commissioner will hopefully be maintained year on year; however, there is a possibility that under the new arrangements, the team may have to bid for funding in the future. Clarification on this matter is urgently required.
- 5 Concern has been expressed by the Council's ASB team over plans by Humberside Police to centralise its own ASB functions. Geographically, this could prove challenging depending on where resources were targeted. In the East Riding, approximately 70% of ASB crimes occur in urban areas, compared to approximately 30% in rural areas. If, however, ASB figures are to be absorbed by the whole Humberside Police area, there is a concern that the urban towns in the East Riding would see a significant drop in police resources for ASB.

Domestic Violence

- 6 The Domestic Violence Adult Service offers support to people living with or fleeing from domestic violence and abuse. The service is available to any resident in the East Riding. Domestic Violence Adult Service workers provide information, advice, guidance, and both emotional and practical support around legal options, housing, welfare benefits, staying safely at home and in high risk cases, finding somewhere else to stay. The service can help individuals remain safely in their own home by providing home security measures, including lifeline alarms, fire checks and personal alarms. Domestic Violence Adult Service supports any victim of 16 years or over.
- 7 The Domestic Violence Children's Service offers one to one support to children and young people between the ages of 5 and 16 who have experienced domestic abuse and live within the East Riding.

- 8 The Prevention of Domestic Abuse Service (PODAS) offers one to one support to adults and young people over 16 years of age who recognise and want to take responsibility to change their abusive behaviour. PODAS aims to reduce the risk to victims and children by providing an intervention package for those who are at risk of or are perpetrating domestic abuse. The service works with individuals to challenge their views, improve self-awareness and provide strategies and skills for minimising future abuse.
- 9 The Multi-Agency Risk Assessment Conference (MARAC) meet on a monthly basis. The goal of the MARAC is to provide a forum for sharing information and taking actions that will reduce future harm to very high-risk victims of domestic violence and their children. Increasing the safety of men, women and children experiencing domestic violence is the aim of the MARAC.
- 10 The current approach to domestic violence between the Council and Humberside Police is very effective, with victims either self-referring or the police/agents making a referral to the Council's Domestic Violence Team.
- 11 The Panel is concerned that by centralising the Public Protection Unit (just one unit for the whole Humberside Police area which will be based in Market Weighton) resources will be spread more thinly and be focused on urban areas across the whole of the Humberside Police area. If the number of police officers and PCSOs are reduced in and around rural communities then the Panel felt there was a real concern that low risk cases will not be captured (as it is often the PCSOs who capture these incidents/are aware of them as they patrol the communities). The Panel seeks reassurances that the creation of a Humberside Police area-wide plan to deal with public protection will provide either the same or enhanced outcomes across all areas of Humberside as currently exist.

Youth Offending Team

- 12 The Youth Offending Team (YOT) typically includes social workers, education welfare officers, police officers, probation officers and health and substance misuse workers. The East Riding YOT is divided into three teams and each deals with a different area of the youth justice system by working directly with young people, victims of crime and the local community.
- 13 The assessment team's seconded police officer has responsibility for those young offenders issued with a final warning by the police and co-ordinates appropriate interventions. Evaluations have shown that the preventative community projects can result in reductions in crime of up to 40%.
- 14 The YOT uses a triage process to identify individuals in need of help. Individuals often become known to the police first and using the Integrated Youth Management System, the YOT works closely with the police to share information.
- 15 The Panel heard that there seems to be growing pressure by the police to work in different ways and there are fears that centralising police youth offending support might have implications for the way the Integrated Youth Management System is run.
- 16 Funding from the Police and Crime Commissioner for the YOT has also been delayed which places a significant financial strain on the YOT as a number of the staff are funded primarily from Police and Crime Commissioner funding.
- 17 There is also concern that if police officers and PCSOs are reduced or removed from certain communities then individuals will slip under the radar of the authorities (as it is often the PCSOs who provide the local knowledge about these young people). Early intervention is vital in making youth offending a success and therefore there are fears that the centralising of resources by Humberside Police will impact on the way individuals are identified.

Drugs and Alcohol Treatment

- 18 The Drugs and Alcohol team is funded by the Council and the Police and Crime Commissioner (£120,000 is funded by the Police and Crime Commissioner and the remaining £180,000 comes from the Public Health grant).
- 19 The Panel felt that the loss of East Riding C Division mean that local links with Humberside Police will be lost as Humberside Police moves to a centralised and standardised Drug Interventions Programme (DIP) across the whole of the Humberside area. It is important that new links be established in respect of functions and development of Humber wide strategies.
- 20 There is good police representation on the Joint Commissioning Group. Concerns remain, however, that whilst officers may still attend future meetings, the representative may not be a specialist drugs officer and, therefore, not have the required specialist knowledge. The Panel seek assurances from Humberside Police that despite the redesign, Humberside Police will continue to send the appropriate specialist officers to meetings of the Joint Commissioning Group.
- 21 The Panel raised concerns over the Humberside Police proposal not to link custody suites to local authority areas. The importance of consulting on these plans in a timely manner was highlighted by the Panel.

Licensing

- 22 The Council is the Licensing Authority and has issued 4,500 licenses, covering 26 different types of licenses. The Licensing Team work with Humberside Police on scrap metal issues and work closely with PCSOs on the Best Bar None awards; however, Humberside Police's priority in terms of licensing lies with those premises which have an alcohol licence.
- 23 Across the East Riding there are 1,300 licensed alcohol premises. Incidents at hotspot areas have been reducing over time; however, it would appear that incidents are increasing in other areas, such as Driffield, Hedon and Hessle. On average there are 20 incidents a week, the majority of which occur before midnight.
- 24 The relationship between the Licensing team and Humberside Police can be challenging and it is rare for police officers to patrol premises the same time as licensing officers in the early hours.
- 25 Between 2005 and 2012, there were only six reviews of premises. Between 2012 and 2014, however, there have been eight reviews, three of which were in the month of March. Reviews usually last between two and three days and are extremely resource intensive, costing around £2,000 each day. If the Police disagree with the decision of the Council's Licensing Act 2003 Committee, they appeal the decision.
- 26 Over recent months, Humberside Police has failed to send representatives to officer coordination meetings. The Council's Licensing Team has been instructed that it can only liaise with Humberside Police's Licensing Team, whereas the Council feels the most appropriate liaison would be between themselves and the Neighbourhood Policing Team. Officers informed the Panel that if police licensing functions were combined with Neighbourhood Policing that would create a far more effective working relationship between Humberside Police and the Council.

Troubled Families

- 27 The Troubled Families programme is a UK Government scheme under the Department for Communities and Local Government with the stated aim of helping troubled families turn their

lives around. The Troubled Families Team has been charged with the task of turning round the lives of 505 families deemed to be 'troubled'; however, the team has identified 569 which exceeds the target given by the Government. The team has turned around 44% of this target during the first period of operation.

- 28 The team currently works with families whose parents are in custody. Work is progressing with HMP Humber to work with fathers in prison. This is currently operating as a pilot scheme for the East Riding; however, the Panel felt that there is the need to create a Humber-wide programme.
- 29 PCSOs are the predominant link with the team and officers expressed concerns that if PCSO numbers are reduced, this will have an impact on the effectiveness of the team's work; the referrals may not be forthcoming and the vulnerable may not be identified. It was also noted by the Panel that engagement with the senior staff at Humberside Police has been challenging.

QUESTIONS FOR THE POLICE & CRIME COMMISSIONER AND HIS STAFF

- (i) What are the roles and responsibilities of the PCC and his Office and how do these differ from that of the Chief Constable?
- (ii) We enclose a copy of what purports to be Matthew's manifesto in which he states that "Police stations will not be lost on my watch" - how does this marry up with the Force redesign and proposed station closures across the East Riding?
- (iii) How did the PCC arrive at a 1.99% rise to the precept?-What other options for a precept rise were considered, or was it solely 1.99%?
- (iv) Humberside Police has to make savings of £32m by 2018. Is this figure net or gross?
 - a) Does this figure take into account the 1.99% precept increase?
- (v) Why did the precept rise by 1.99% when it is reported the Office of PCC holds £32m in reserve?
- (vi) Does the PCC intend to soften the impact of the £32m savings required by making use of reserves?
- (vii) Will other partners be expected to bear the cost of the PCC's vision for perpetrators entering custody (i.e. providing drug, alcohol or mental health services)?
 - a) Who should provide these services?
 - b) If partner organisations are to provide these services will they receive any financial support from the PCC?

QUESTIONS FOR THE CHIEF CONSTABLE AND HER STAFF

General questions regarding the Force redesign proposals

- (i) When is the new Force structure to be implemented?
- (ii) When will the public and key stake holders be formally consulted on the proposed changes? What form will this consultation process take?
- (iii) Are the proposed changes to Humberside Police based on a successful model?
- (iv) What other options have been considered?
 - a. What was the reasoning behind discarding these options?
 - b. Has it been considered to split Humberside Police, having a separate Force for the North and South Banks?
- (v) What are other similar Forces across the country doing to combat the savings required?
 - a. Are they proposing similar changes to their organisational structure?
 - b. How are they consulting and engaging with the public and key stakeholders?
- (vi) Why do we have police stations and why are they situated where they are? Presumably they are needs driven by the community?
 - a. Is it needs driven that we have police stations?
 - b. Are the current police stations in right location? Do they fit in with the new model?
 - c. Does the new model take into account spikes in crime (e.g. rise in crime in Bridlington during summer months)?
- (vii) Has there been a statistical data analysis undertaken of urban need & crime vs rural need & crime?
- (viii) What are the actual numbers of police officers and staff at present based in the East Riding and other areas of the Humber?
 - a. How are these located across the East Riding (numbers and locations)?
- (ix) How many police officers and staff will remain based in the East Riding following the proposed Force redesign and by 2018 (including PCSOs and volunteers)?
- (x) How will rural communities throughout the East Riding be supported (violence, theft, poaching, lamping and Farm Watch) following the Force redesign?
- (xi) How are policing levels determined for the East Riding and the rest of the Humber area?
 - a. How do you balance the need for a physical presence against non-uniformed staff?
- (xii) Predictive Policing - how is this being used to inform the Force of its new plans for redesigning the Force?
- (xiii) The East Riding has high crime levels compared to other divisions but a lower rate of crime per 1000 people. How can the Police be confident the East Riding is a safe place to live? People may not report crime due to intimidation or other threats, or because there is a slow or no response when concerns are raised.
- (xiv) High crime areas in the East Riding are Goole and Bridlington but they do not feature in the proposed changes. What therefore is the Force's vision for the East Riding?
 - a. How will the Force ensure the same level of response and resources for the East Riding that other local authority areas will receive?

- b. If resources are focussed on the three areas of Hull, Scunthorpe and Grimsby and criminals targeted accordingly, will the East Riding not be seen as a soft touch for other criminals?
- (xv) What are the footfall figures for all East Riding Police stations?
 - a. Whilst these may not determine the need for a police station, is the station needed for incident response.
- (xvi) How can you ensure a quick and efficient response across the East Riding if neighbourhood police stations are closed or staff relocated?
- (xvii) How will crime figures be recorded and analysed under the new Force structure?
- (xviii) What are the crime levels across the East Riding and other divisions year on year?
- (xix) Reducing demand - is this a case of diverting call for services to partners?

Custody suites and pathways to rehabilitation

- (i) Are there plans to close the custody suites in the East Riding?
- (ii) If suites are closed, has it been taken into consideration the extra travel time required of officers to transport offenders to other custody suites and therefore a reduction in police officers in that area as they accompany an offender elsewhere?
 - a. In reality will not officers be more likely to issue more cautions than having the inconvenience of escorting an offender to a Hull or south bank custody suite?

Mobile Technology

- (i) What were the findings of the trials in Cottingham and Kirk Ella for officers using secure mobile technology?
- (ii) The Deputy PCC reported that using secure mobile technology saved officers up to 2 hours less per shift in the police station but how much data/information can be accessed via the secure mobile technology?
- (iii) How exactly has the £500,000 grant been spent on procuring securing mobile technology?
 - a. Will rolling out secure mobile technology to all front line staff creating significant savings?
- (iv) How is the Force ensuring it will be compliant with data protection legislation in using secure mobile technology at hospitals and in people's homes etc?



Protecting Communities, Targeting Criminals

Transparency of the Office of the Police and Crime Commissioner Final Report

Auditor	Michael George
Contact Details	01924 294061
Review Date	July 2014
Draft Report Issued	9 October 2014
Final Report Issued	4 November 2014

1 Executive Summary

The Elected Local Policing Bodies (Specified Information) Order 2011, and its amendments (2012), specify the information that an elected policing body, in this case the Office of the Police and Crime Commissioner (OPCC), should make publicly available and also how frequently this information should be updated.

The purpose of this review was to provide assurance that the OPCC produces the necessary information in compliance with this Order. This involved comparing information requirements set out by the Order and the details provided on the OPCC website. This will in turn provide assurance that the same information could be located by any member of the public.

In performing the review it was found that the appropriate information is available on the website. Suitable information pertaining to the office holder is required, whereby office holder refers to the commissioner and any deputy police and crime commissioner appointed by the commissioner. The names of both office holders were displayed as well as their salary, expenses, business interests, and where applicable any complaints lodged against them.

The details of the other staff members within the OPCC are also given in compliance with the Order, along with a further breakdown of other information such as gender, ethnicity, and disabilities of the staff. Further information regarding staff who earn over £58,000 is given, along with any gifts or hospitality that staff have received.

Financial information is a key provision of the Order and must include the detailed budget of the OPCC, the precept, proposed expenditure, any expenditure over £500, the investment strategy, and grants awarded in the previous financial year. All of this information was available on the OPCC and Humberside Police website.

The Order also requires that contracts for expenditure over £10,000, that relate to either the Commissioners Office or the Force, are published. Humberside OPCC and Police do not comply with this. In common with other commissioners and forces this requirement has not been implemented on the basis that it is unduly onerous to comply with and is of no interest to the public. The issue is being raised with the Home Office by the Association of Policing and Crime Chief Executives and the Police and Crime Commissioners Treasurers' Society. We accept the risk management decision not to comply with this provision and therefore do not raise any additional recommendation. We have considered this non-compliance in the context of the other matters in the Order when forming our overall view.

The procedures and policies of the OPCC specifically regarding Anti Fraud and Corruption, including confidential reporting, Freedom of Information requests and complaints handling, are also set out. In addition details of the complaints handled by the Police and Crime Panel against the Commissioner are also reported.

The Annual Report was obtained from the website and reviewed against the information it should contain. The Report set out the Commissioner's strategy, and the activities that have been undertaken in the previous financial year, to meet those objectives.

Details of public engagement events are also available, as are the minutes of the Joint

Governance Group and the Regional Collaboration Board. There is also an up to date account of decisions that the Commissioner has made.

Overall it has been determined by Internal Audit that the OPCC is compliant with the Elected Local Policing Bodies Order. The information is particularly clearly laid out on the OPCC’s website and collated together for ease of access. This positive view has also been endorsed by CoPaCC (Compares Police and Crime Commissioners), when they assessed that the Humberside Police and Crime Commissioner was the second most transparent OPCC in England and Wales.

	Commentary
Effectiveness of Risk Management Approach	The management of publicly available information via the OPCC website is appropriate and effectively communicates what is required by the Elected Local Policing Bodies (Specified Information) Order. In all cases the necessary information could be located. The risk management decision not to comply with the requirement to publish contracts over £10,000 is one that is common across the sector and the requirement itself is under question.
Efficiency of Risk Management Approach	The information was readily accessible and clearly labelled, enabling members of the public to review the details that are required to be published.
Assurance Level	1 - Reasonable Assurance, with best practice
Overall Risk	

2 Scope and Approach of the Audit

The audit covered the information that the public is entitled to be provided with by the OPCC, internal audit performed checks of the OPCC website and the Humberside Police website against the Elected Local Policing Bodies (Specified Information) Order 2011 in order to ensure that the information required, was displayed.

3 Report Distribution

Name / Role	Draft	Final
John Bates, Deputy Chief Executive and Treasurer	✓	✓
Martin Scoble, Chief Executive	x	✓

4 Appendix: Opinion of Internal Control

Internal Audit assesses the effectiveness of internal control, within the scope of what is audited. This measure is therefore a relative one.

Category	Description
1	Reasonable assurance can be provided that the main risks considered are being effectively managed; action may still enhance the management of risk in a small number of areas. In addition Internal Audit has identified that the approach taken to address risk as representing good practice in this area.
2	Reasonable assurance can be provided that the main risks considered are being effectively managed. Limited management action may be required to address a small number of significant issues.
3	Limited assurance can be provided that the main risks considered are all being effectively managed. Significant management action is required to address some important weaknesses.
4	Inadequate assurance can be provided that the risks identified are being effectively managed. Significant weaknesses have been identified in the risk management action, these are likely to involve major and prolonged intervention by management. These weaknesses are such that the objectives in this area are unlikely to be met.

5 Appendix: Risk Assessment Criteria

The risks in this report have been assessed using the following criteria:

Likelihood	Very High					
	High					
	Medium					
	Low					
	Very Low					
		Very Low	Low	Medium	High	Very High
		Impact				

Compare Police and Crime Commissioners (CoPaCC) Submissions - Humberside

Public Engagement – Feb 14

Overview

Since his election, Matthew has endeavoured to communicate and engage with the general public in a variety of ways which will be outlined below. He has also responded to enquiries from the public who correspond with his office on a daily basis. There has also been considerable interest from the media since Matthew took office.

Overall, the level of public and media engagement has vastly exceeded that of the former Police Authority, and members of Matthew's team have had to significantly adapt their workload to deal with the capacity involved. Matthew's Public team consists of two members of staff, the Force Liaison Officer and the Communications and Engagement Officer. Members of the administration team are also tasked with handling correspondence, general enquiries and complaints. Public Engagement is the fundamental way in which Matthew carries out his business.

Correspondence

The level of correspondence received by Matthew has been very high. By the end of February 2014, Matthew had received around 2000 emails and more than 800 letters. A good percentage of these are from members of the public asking Matthew for help in regards to their individual issues with Policing and Crime. Every piece of correspondence is investigated and answered. Often these have resulted in a personal visit or call from Matthew to the person concerned.

A system has been put in place with the force to deal with enquiries of an operational nature. Matthew has no powers to interfere in operational policing, but as the public's representative will direct operational correspondence through the Force Liaison officer, a serving Chief Inspector seconded to the OPCC, who will make the



necessary enquiries within the force and feed the results back to Matthew to enable him to monitor performance. To understand how Police and Crime Commissioners are able to make a difference to members of the public, here are some examples arising from pieces of correspondence to Matthew, which he relates in his own words:

"I was approached by a woman who had bladder cancer. She was picking up her grandchildren from school when she was caught short, a symptom of the disease.

What was she to do? Abandon the children? Not an option. Wet herself? Not an option for such a respectable woman. The only option was to find somewhere to discretely relieve herself, which she did behind her car door. However, someone in a nearby house saw this happen, took her registration number and called the police. Two male officers came to see her at home and she was given a fixed penalty notice for urinating in a public place, the kind you would give to a drunk on a Friday night.

She was distraught and asked me if I could intervene. A lot of people do not like to approach the police but see me as just Matthew, someone who can help. I am not an alternative appeals process but on this occasion I went to see the chief constable and the notice was quashed.

The point of the story is that I see my role as changing the culture of the police. We lost accountability somewhere along the way.

In another example, I was approached by a family whose son went to university and ended up becoming mentally ill and being sectioned. One day, in his room at the hospital, he smashed a mirror and the police were called. He received a caution for something he did while ill. Now, in addition to battling mental illness, he has to go through life with a record. How does that benefit anyone?

We had another case, a family whose father committed suicide. His eleven-year-old daughter was picked on at school by a child who said he killed himself because his daughter was fat and ugly. Her abuser was of mixed race and the daughter retaliated using the abuser's ethnicity in what she said, the police were called and she found herself being investigated for hate crime. Now, I have come out publicly against hate crime but was this really the way to deal with this? Do children at that age really fully understand the full impact of words? Is a police investigation really the way to deal with it? Do we not need to use more commonsense? I think a lot of police officers were relieved when I started talking like this."

In YOUR Neighbourhood

Since his first week in office, Matthew has held fortnightly Street Surgeries across the force area. These have enabled the public to meet Matthew in person to discuss their concerns, which are then followed through as with correspondence above. The Street Surgeries have also been the source of very **positive** feedback from the public on the level of service received from the force.



During the drafting of his Police and Crime Plan, Matthew held public meetings across the force area and invited feedback from the public, strategic partners and the force on his draft plan through these meetings and via his website.



In January 2013, Matthew began his 'Neighbourhood Tour', aiming to visit every ward in the force area during his first year in office. This involves a full day meeting with Neighbourhood Policing Teams, ward, town and parish councillors and community groups to identify local issues and look at successful crime reduction initiatives. Matthew has also attended, by invitation, evening parish council meetings and various community events.

Matthew has also been invited to local secondary schools, further education colleges and the University of Hull to address students. One recent event at Hull College attracted 200 students and the college have asked Matthew to return on a regular basis.

In Spring 2014 Matthew will embark on a joint bus tour of neighbourhoods across the force area, accompanied by ward councillors of all political parties, to meet residents and discuss local issues, especially in more remote areas.

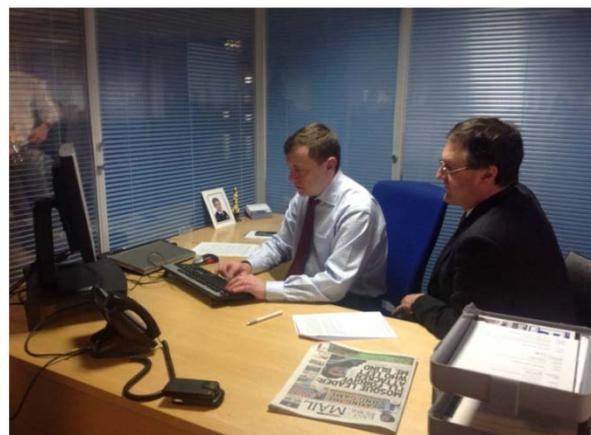
Matthew adds: ***“For me to hear the views of the public, it’s vital I go to them, not sit in my office and expect them to come to me. At one of my Street Surgeries in a busy town centre, I observed a young man walk by twice; both times he looked at what was going on, as though he was plucking up courage to come over. On the third time of passing he came over and told me a story of something horrific which had happened to him. He needed help and I helped him find it. If I had held ‘appointment only’ surgeries in a building, that young man would never have come to see me. Very few meetings with members of the public take place in my office. I go to them, in their homes or businesses, with their family and friends where they are at ease.”***

A record of Matthew’s public engagements can be found on his website at <http://www.humberside-pcc.gov.uk/Document-Library/Working-for-You/Transparency/How-we-make-decisions/Record-of-PCC-Public-Engagements.pdf>

Digital & Social Media

Matthew’s website www.humberside-pcc.gov.uk has had over 32,000 ‘hits’ from over 18,000 unique visitors since launch. It contains a vast amount of information about Matthew’s work, latest news, photos, a monthly blog, and all the statutory information Matthew is required to publish.

Through the website, Matthew has held a series of monthly ‘Web Chats’ with the public, which have been extremely successful. He has also held three with local newspapers The Grimsby Telegraph and The Hull Daily Mail, where over 500 people logged on to the debate, and over 1000 more visited the newspapers’ website to read the questions and



answers in the 48 hours after the event. Matthew said: "***Crime and Policing are subjects which generate a huge amount of interest and opinion. As Commissioner, my job is to listen to the public's views and use them to hold the police to account. Events such as this are an invaluable way to engage with residents.***"

Matthew is very active on **social media**. His Twitter account [@humbersidepcc](https://twitter.com/humbersidepcc) has almost 2,500 followers and he Tweets most days on his activity. Matthew recently spent two late shifts working with 999 Incident Response teams in Hull and Grimsby and Tweeted live throughout on his observations. Both events attracted a huge following, not just locally, but across the country with extremely positive feedback from both the public and serving officers that Matthew was seeing life at the 'sharp end.' Hundreds of Twitter users followed the night's events, as Matthew tweeted live updates from the incidents they attended. Matthew also has a popular Facebook page.

Victims Surgeries

Each month, Matthew meets the victims of serious crime. These Victims Surgeries are coordinated by Victim Support at their offices. Matthew hears first hand, the stories of victims and how they have been supported since the event.

Matthew says: "***These surgeries are my rocket fuel. If there is one thing that motivates me to get up every morning and come to work, it is the often harrowing testimony of victims of crime, and my desire that when I leave office, there will be fewer victims than when I came in. I have often been moved to the point of tears, and I am determined to improve victims' services***"

Public Contact through the Media

Matthew has a healthy relationship with local and national media outlets (TV, Radio and Press), and has made himself available to all requests for comment and appearance on a variety of subjects relating to his role, so the public can judge his performance through the mass media.

He is a regular guest on BBC Radio Humberside phone-in shows, and the regional BBC news programme 'Look North'.

Matthew contributes a monthly column to five local newspapers across the force area



updating residents on his work and ambitions to reduce crime and improve safety. He has also contributed to professional journals such as Police Professional and Police Oracle, and was recently featured in the Big Issue North. This prompted contact from The Sunday Times' nationally renowned columnist AA Gill, who visited the area and spent a whole night on the streets of Cleethorpes with Matthew and local MP Martin Vickers in the run up to

Christmas meeting revellers, business owners, local voluntary groups and police to look crime and ASB issues in the Night Time economy.

Consulting the public

When making important decisions, Matthew has consulted with the public to get their views. When it came to setting the policing precept for 2014/15, Matthew proposed a rise of 1.99%, but not before he had asked the taxpayer. Matthew commissioned social research company SMSR to conduct a sample survey of 1000 residents, and took printed questionnaires to weekly Street Surgeries, which were completed by approx further 300 residents. Matthew said: ***“If I need the help of the taxpaying resident to fund policing, I need to meet them face to face to explain my reasons and listen to their views. It can’t be purely a tick-box exercise. Hearing their answers in person puts their words into context.”***

Conclusion

From the first day he took office, Matthew has worked tirelessly, not just to listen to the views of the public, but to make them count, to drive the development of the Police and Crime Plan, to work towards a better service for victims of crime, and to inspire the public to get involved. As Matthew says himself... ***“This isn’t my police service, it’s not the Chief Constable’s either, it belongs to the public as Robert Peel envisaged almost 200 years ago. Somewhere along the way the two began to drift apart, now they are pulling back together to become closer together than they have ever been. I am the public’s servant and their voice on policing and crime, my style is to get out there and listen to them, and as I have discovered, they have plenty to say and much to contribute. I want to inject common sense back into policing; I will only get that by discussing policing with the public.”***



PCC's and Innovation - May 2014

Introduction

When I stood for election as Police and Crime Commissioner, it was clear in my mind that if I was going to make a difference to the people of East Yorkshire and Northern Lincolnshire, to reduce crime, make our communities safer and improve the quality of services to victims, there would need to be a major sea-change in the way we did business. The austerity measures in place to revitalise the economy have forced all public sector organisations to look at how we deliver services. In tough times, necessity is the mother of invention, and is usually when innovation comes to the fore, where bold ideas which at first may seem impossible, come to fruition.

The Police Reform and Social Responsibility Act 2011, which created Commissioners, states:

“PCCs must bring together community safety and criminal justice partners, to make sure local priorities are joined up.”

I was determined to play my part in creating a ‘big team’ to harness the energy and enthusiasm of the public and our community safety partners. This document sets out the huge volume of work that has been implemented during the last 18 months to find solutions to the problems we face today and in the future.

Public Engagement

This area has been covered in detail in CoPaCC's previous thematic, so I will not cover it in depth here, but it definitely demonstrates innovation in the way I have connected with the public. Whilst some other Commissioners have chosen to hold public meetings in halls, or closed surgeries by invitation, my approach from day one has been to go where the public are, not expect them to come to me. My public street surgeries every fortnight have allowed residents to actively engage with their Police and Crime Commissioner, which in turn allows me to hear issues they want to be addressed. I have been able to connect with the public in a way the former Police Authority never did. They now have a face and a name to call upon for help, and I have been able to help many of them get the answers and solutions they were searching for.

Mobile data

One of the key areas of my Police and Crime Plan is to improve the visibility and accessibility of our police officers and PCSO's.

The Policing Innovation Fund was announced by the Government last November and applicants were invited to put forward ideas for improving policing. A joint bid for a share of the £20 million fund was made on behalf of Humberside and South Yorkshire Police, who share IT services, in line with the qualifying criteria which required applications to “demonstrate innovation, an opportunity for collaboration and commitment to supporting improved digital working.”

In February I was delighted to announce that £1m from the Innovation Fund had been awarded jointly to the two forces to collaborate in developing Mobile Technology, including Tablet devices and lightweight laptops to free up more time for police officers and PCSO's from admin duties so they can spend more time on the beat protecting communities.

The joint bid featured the findings of a pilot study in which mobile technology was tested to increase the visibility of police officers and PCSO's on patrol in their communities. During the pilot, officers were provided with Tablet devices and laptops enabling them to work within their communities without the need to return to the police station. Early feedback showed this allowed them to complete paperwork in a variety of locations, including the homes of victims of crime, speeding up and improving the service.

The award has helped us to push forward with our plans to free up our officers and get them out of the yo-yo cycle of returning to buildings to check police systems and fill in paperwork. Whilst we can't totally free them from administrative tasks, this technology makes it easier and quicker for them.

I am constantly told by the public they want to see police officers and PCSO's out on patrol in their communities, not hidden away in police stations, but at present our officers are pulled back into buildings every day.

This award will also allow us to move forward with our plans to open more police contact points in shared buildings, which I will mention in more detail later. Across the force area officers will now be more widely distributed in more communities, not just concentrated in a few large police stations as they are at present.

The trials showed officers were able to spend up to two hours extra per shift on patrol when they had mobile technology available to them. Multiply this across the force and it will lead to a significant increase in our police presence and allow a better service to residents.

Humberside Police Assistant Chief Constable Alan Leaver echoed my thoughts, saying: *"Providing mobile technology to officers and staff when and where they need it allows them to be out and about in our communities which is where the public wants to see them."*

"Not only will it offer the opportunity for greater visibility but it will enable officers to work more efficiently and effectively, delivering an improved service to the public."

Victims' services

Since I took office, I have held regular closed surgeries with victims of crime. These have been facilitated by Victim Support at their offices or the victims' own home. I have sat, often for hours and listened to harrowing stories from victims of the most serious crimes such as rape, sexual assault and domestic violence. I have also met families who have lost loved ones, and I am frequently moved to the point of tears as they all relate their experiences, not just of the ordeal they suffered at the hands of the perpetrator, but the support, and sometimes lack of support they were given by the police, the criminal justice system and other agencies. These meetings act as my rocket fuel, the victim must always come first as these crimes erode and damage the lives of many families, as well as diminishing life chances for our children. Considerable work is going into the preparation for the commissioning of victims services from October, but I have already acted locally to make a difference.

In May this year, I made a grant of £41,000 from my Community Safety budget to fund an Independent Sexual Violence Advisor (ISVA) on the North Bank of the Humber for the next 12 months.

There were two advisors employed on the South Bank and one in the North, which I identified, was disproportionate. There cannot be a postcode lottery with a service as serious as this. The funding has been provided to Victim Support to employ a second advisor to work in Hull and the East Riding, delivering a vital service to victims of sexual crime.

The role of the ISVA is to provide ongoing support to victims of recent and historic sexual abuse and make sure they have the best advice on what counselling and other services are available to them, the process involved in reporting a crime to the police, and taking their case through the criminal justice process, should they choose to do so.

In my Police and Crime Plan I prioritised victims of serious crime, those who are persistently targeted and the most vulnerable. Victims of sexual abuse often fall into all three of those categories and need the best support we can give them.

We already have a first class Sexual Assault Referral Centre (SARC) in the area providing round the clock care and support to people who experience sexual violence, and we work closely with the health service and criminal justice system. The ISVA's are a vital part of helping victims to recover and a strong shoulder to lean on at a time when they need it most. The funding I am providing will ensure there is always support available to those who have suffered some of the worst types of crime, no matter where they live.

I have also asked for further reports on the provision and availability of Domestic Violence services and support for child victims of sexual violence in each local authority area. The information I am gathering will help him determine how and where future funding decisions are made.

This followed on the back of another funding decision in March when I stepped in to save a local centre helping victims of rape and sexual abuse, after their funding was reduced by central government.

The Hull Rape Crisis and Sexual Abuse Service was facing closure and staff were given redundancy notices after The Ministry of Justice reduced their annual funding from £30,000 to £20,000. The board of trustees at the service already raises a further £10,000 per year to keep the centre going, and having to double that amount to make up the shortfall was looking impossible.

After hearing about their plight, I agreed to provide £10,000 per year for the next two years from savings I have made in the running of my own office, securing the future of the service until 2016.

Rape and Sexual Assault are devastating crimes which can leave a lifelong effect on their victims. Hull Rape Crisis now continues to do vital work to support victims and help them get their lives back on track. When I was elected I made a pledge to put victims of crime at the forefront of everything I do, so I was very concerned to hear this service was facing closure. Since I replaced the former Police Authority I have managed to make significant savings in the running of my office, and I was delighted to be able to use some of that money to support the work of Hull Rape Crisis and keep the centre open.

Following the decision, Hull North MP Diana Johnson said: *“After funding cuts from the Ministry of Justice put the future of Hull Rape Crisis Centre at risk, it’s a great relief that we’ve been able to work together locally to find funding to keep the current level of service and prevent victims of rape having to travel 60 miles to Leeds.”*

Charlotte Kemp, Centre co-ordinator at Hull Rape Crisis added *“We would like to thank Mathew for providing the shortfall of £10,000 per a year for the next 2 years.*

We appreciate all the work that the volunteer counsellors provide to the women who use the service and to the two paid part time staff who work tirelessly to fundraise, promote the service and raise awareness around sexual violence and personal safety within schools and colleges”

Restructuring the force

In early 2013 I appointed a new Chief Constable, Justine Curran, an officer with an outstanding record who I consider to be a Chief for the 21st Century. I gave her one performance goal, to reduce overall crime. No more chasing figures, I want discretion and common sense to be the guiding principles of our officers, not statistics. The freedom to do the right thing for the public at the time, even when it's not the way things have always been done.

I asked the Chief to redesign the force to deliver the service required by our residents with the money we have available. To start afresh with a blank sheet of paper, with the needs of the public at the heart of everything we do. She has not let me down, consulting with staff, listening to their opinions and implementing the most ambitious change programme the force has seen for decades. By the start of 2015/16 we will have a redesigned force fit for the challenge, and I am confident our residents will see an improved police service.

There was one other clause I gave the Chief, to recruit new officers every year.

After I was elected, I discovered the force had not recruited new Police Constables for some time. I was concerned this was creating a gap in the organisation which would cause problems in years to come, and blocking the progress of some of our dedicated Special Constables and support staff who aspired to become full-time PC's.

Despite the financial challenges we face, I encouraged the Chief Constable to undertake a regular recruitment of officers to replace some of those who are retiring, and I was encouraged to see 17 new constables begin their training in March 2014. All were recruited from the Special Constabulary, PCSO's and support staff, meaning the path to a career in policing has been restored, and the message has gone out to anyone who wants to pursue a career in policing that there WILL be opportunities in the future, and the best way to get started is to join the force as a Community Safety Volunteer or Special Constable.

Working together to protect the public

As part of my Police & Crime Plan, we have developed supporting objectives around managing dangerous offenders and protecting children, youths and vulnerable adults.

This area of business is not often visible or obvious, but requires a coherent response. It is a key responsibility of the police service, working with both statutory and voluntary partners.

Through consultation, the public clearly identify this area of business as a key issue, and see the potential risk of serious harm. The police are also in a unique position to identify early warning signs when children, young people or vulnerable adults are suffering abuse or harm, and play an essential role in their protection.

I have therefore placed tremendous focus on this area of business, as well as the more obvious areas of volume crime reduction, mobile working and other areas of business which are more visible and arguably easier to get to grips with.

If we look at Humberside, there is much good practice within the police and partner organisations which enables us to tackle and confront this difficult and demanding area of business head-on. It is one reason why I believe we have such a low rate of domestic homicide locally.

I cannot stress enough the importance of partnership working between agencies. If we do not work together, there is every possibility that things will fall through the 'gaps' between responsible organisations. I intend to continue bringing the issue of protecting the public out into the open and confront issues head-on.

I have taken an innovative multi-layered approach to tackling the issues, and I will continue to build on this in the future. The steps I have taken so far include, as I have mentioned above, regular victims surgeries, the funding of Hull Rape Crisis and a new Independent Sexual Violence Advisor. But more work is ongoing:

(1) I am looking to fund Independent Domestic Violence Advisers (IDVAs). At the heart of services to victims of domestic violence is a national model which prioritises victims at high risk of serious harm or murder. This model depends upon specialist support from trained advisers called IDVAs. IDVAs are independent and provide emotional and practical support, engaging adult victims from the point of crisis and mobilise the resources of many different agencies to keep each victim and, where necessary, children safe. The effective coordination of other public services now happens through the work of Multi-Agency Risk Assessment Centres (MARACs), meetings usually chaired by the police, where statutory and voluntary sector partners work together to share information on the highest risk cases, and a coordinated safety plan to protect each victim is developed.

In my area, IDVA/MARAC provision has historically been funded locally from public bodies and from a range of charitable organisations mainly with one off or short term funding. As we are all fully aware, funding is getting much tighter during these austere times, and our IDVA provision was identified as a patch work / postcode lottery with variable working practices for IDVA services working in the community. I am currently researching funding arrangements for IDVAs and hope to share responsibility with those other organisations who have a vested interest in preventing and reducing domestic violence such as Local Authorities (including public health) and Clinical Commissioning Groups through a pooled budget arrangement. The aim of my approach is to provide long-term stability and certainty for the domestic violence services across my area. This requirement came out of a violent crime summit that I organised on my arrival in office, namely to increase the capacity of IDVA provision.

(2) I have also been doing significant work with the SARC (Sexual Assault Referral Clinic). The SARC provides round the clock care and support to people who experience sexual violence and demonstrates good partnership working between healthcare and the criminal justice system. There are two things that I have done to date to support the valuable work of the SARC, namely I have invested in and developed (using my own in-house team) a new victim-focused website www.casasuite.org.uk providing valuable information to people to encourage them to use the service by seeing first-hand that it is there for them. In addition, there is also an issue, raised by Victim Support and the SARC Manager about the lack of effective support in the area for children and young people. In some cases child victims of

sexual abuse were being taken to Leeds for treatment. This was clearly not good enough and I was so concerned I raised the issue with the Health Minister. This triggered a response locally and there has been a marked improvement in service since. I am currently asking whether there is any opportunity to fund a specialist advisor to support young people at risk of or suffering sexual violence and/or sexual exploitation. This is an issue which I am actively exploring further with partners.

- (3) I have, as part of the Stage 2 transfer of staff, developed a shared corporate support team which report direct to me, whilst providing a service direct to the Chief Constable. One of the first things I did was bringing information management under my day-to-day control and I immediately instigated a piece of work to develop a performance management framework for domestic abuse, something which was recognised as a requirement by HMIC. This work is now complete and provides the Chief Constable, officers and partners with a much richer picture of the scale and nature of domestic abuse offenders and victims in my area. The next step is to incorporate a wealth of criminal justice data in order to widen the picture. It's the same story in relation to serious sexual offences as well, where I have recently completed an even more detailed framework for serious sexual offences. Here are some comments from people using the new information:

"Thanks again for all your hard work on this. Very impressive!" - Assistant Chief Constable

"I wanted to thank you for the report you compiled for me in respect of serious sexual assaults. This information is not only used by myself but by a number of other agencies in the Force area. This report is helping agencies work together to ensure that a first class service is being offered to victims of sexual crime. It is working from a crime prevention perspective, treatment for victims and aftercare for victims. The report is very detailed and accurate and I appreciate the time and effort that you put in to this report. It is invaluable." - SARC Manager

"Can I thank you for supporting us for the public protection work on domestic violence, sexual offences and hate crime ... exceptional." – Detective Chief Inspector (Protecting Vulnerable People Unit).

- (4) I have driven the Force in implementing a centralised Protecting Vulnerable People Unit. The need for a single process was recognised by HMIC and this move locally is a really positive step. The Force has many highly committed and dedicated individuals who are already seated in this arena, and centralisation of the function will allow them to build on previous successes, delivering a service which will protect the public and have a positive impact on the victims' journey. The function will also build upon existing work in fully engaging the entire organisation as well as partners.
- (5) I am also supporting the award-winning 'Strength to Change' project in Hull, which is a small but dedicated team of people who work with the perpetrators of domestic abuse, in order to help them change their behaviour and to turn their lives around. I have visited them in the last year and I am committed to supporting and building on the excellent work they do. This is truly innovative work. There has been a consistent 64% reduction in the rate of re-offending by men who have completed the

project, as well as a steep drop in the number of police call-outs and severity of incidents. It is estimated that the service saved the taxpayer £8m in the first 16 months alone.

Finally, I also recently attended and spoke at a conference locally on Child Sexual Exploitation (CSE). It was an informative and moving conference, inspired not just by the professionals but also by victims of these horrendous crimes. I am working to now gain a better understanding of CSE, our system capabilities, and ensuring that we record CSE intelligence much better. We can reduce serious harm to our children if we work together. I believe that the more small steps we take, and I have highlighted above the small steps I have been making so far, then we will eventually achieve one big positive outcome for local people.

Commissioner's Crime Reduction Fund

As soon as I was elected I made a promise to sell the luxurious building I inherited from the former Police Authority, The Pacific Exchange, and use the proceeds to create a fund for local community projects that will help me deliver the outcomes in my Police and Crime Plan.

At the time of writing this thematic, I am in the final stages of selling Pacific Exchange to Hull City Council. The net proceeds from the sale, around £350,000, added to the significant savings I have made in the running of my office since my election will help to create the Commissioner's Crime Reduction Fund of over £1 million, where local community and voluntary groups across East Yorkshire and Northern Lincolnshire will be able to submit bids for projects to aid crime reduction and community safety. I'm looking forward to some innovative ideas put forward!

I will now relocate my team into more modest rented accommodation which I hope will be shared with another public sector partner, generating further annual savings which will also be added to the Fund.

In my Police and Crime Plan, I have asked Humberside Police and our partners to look at the savings and efficiency that can be obtained by co-locating our services. It's important to me to lead from the front and set the example, and by doing so create something that will benefit our communities.

Collaboration with public sector partners

In my introduction, I spoke of creating the 'big team' to reduce crime and make our communities safer. Following my election I appointed my deputy Paul Robinson which the specific remit of working with partners to identify areas where we could work together, generating savings which could be ploughed back into frontline services to better serve the taxpayer. Here are some of the innovative solutions we have so far embarked upon.

Local Authorities

We are actively negotiating with local unitary authorities, town and parish councils to provide police contact points in public buildings, increasing accessibility and visibility of Neighbourhood Policing Teams. The first of these opened in Crowle, North Lincolnshire in March 2014, where residents now have improved access to their local police following an agreement with North Lincolnshire Council to have a permanent police contact point at the town's Community Hub.

Every Monday, a PCSO is based at the Hub to speak to residents, deal with any issues and give advice on crime prevention. If the service proves popular, it may be extended to cover other days of the week.

I hope this will be the first of many across the Humberside force area. There are some fantastic opportunities to improve our residents' access to their local police teams by locating them in shared buildings with our public sector partners.

I'm delighted that North Lincolnshire Council share our vision on this, they are already funding five PCSO's across the council area with more to follow, and see the mutual benefits of working closely with us to improve neighbourhood policing.

Once we begin the roll-out of mobile technology to our officers, they will have access to all the systems they need to be able to spend more time out of police buildings and on patrol in their communities where residents want to see them.

Councillor Liz Redfern, Leader of North Lincolnshire council said: *"We are working with Humberside Police on a number of initiatives that will have many benefits for local residents. We are continuing to fund a number of PCSOs, and this in addition is a great opportunity for people to speak to their local neighbourhood policing team to discuss any problems or issues they might have. Many residents don't know who their neighbourhood policing teams are so this is the ideal way of meeting them and finding out what work they do in the area. If this proves a success we will look at increasing the number of Police Contact Points across North Lincolnshire."*

Humberside Fire and Rescue

On the first day I took office, I was presented with a decision record to sign off the development of an £8m building for the force, prepared by the outgoing Police Authority. A major part of the facility was a vehicle maintenance depot. I knew that just 5 miles away from the proposed site, the Fire Service was planning a similar project of its own.

I asked them to go away and talk to the Fire Service, saying I would not sign the decision unless they explored all possibilities to collaborate. In October 2013, after months of negotiations, a joint plan was developed to support the maintenance of police and fire service vehicles across the Humber and Yorkshire region.

The new site will also enable Humberside Police to consolidate a number of other departments at seven different sites into one location, moving out of some premises that are leased and disposing completely of others. This will raise capital receipts to offset the cost of the new building, and in addition it is estimated these changes will generate further savings of approximately £200k per year for the two organisations. The energy efficient building will also result in reduced energy and running costs compared to existing accommodation of around £69k per year.

Further cost savings will be achieved through a number of collaborations with neighbouring police forces, with the building housing the Yorkshire and Humber regional underwater rescue unit.

In addition to this development, we are already collaborating on fuel bunkering with two local authorities and with the Fire Service on Community Safety Volunteers and driver training.

Together, we are demonstrating that in the face of funding challenges, we CAN join forces to meet them and improve the protection we deliver for our communities'

Councillor John Briggs, Chair of Humberside Fire Authority, said: *"This is a true example of real partnership working and Humberside Fire Authority is committed to its absolute success in conjunction with our colleagues in the Police. In the future we will continue to explore new initiatives which could enhance the service we provide to all communities across both sides of the Humber."*

Chief Constable Justine Curran said; *"We talk a lot about working together so it is great to be able to see this becoming a reality with a commitment to working side by side on vehicles and getting more for our money for our communities. Hopefully it is just the start and who knows where it will take us"*

Chief Fire Officer Richard Hannigan said; *"The vehicle and equipment workshop collaborative is a great example of how the emergency services in the Humber Area can work together to provide a state of the art facility at the lowest possible cost. Local blue light services are proving that together they can provide a great service to the public even in the face of severe financial pressure."*

Volunteers

Since my election, I have championed our Special Constabulary and Community Safety Volunteers. I am in deep admiration of any member of society who gives up their time, and even puts themselves in harm's way to serve their community. I encouraged the force to increase the recruitment of special constables. When I took office this was only happening in selected areas. I am delighted that there is now a force wide recruitment campaign and the number of specials has risen by over 100 and continues apace.

Over 40 more Community Safety Volunteers have been recruited. We share our team with Humberside Fire and Rescue and they are an amazing bunch of people aged 18 to over 80, who devote their time to give crime and safety advice to residents, from shed alarms to cycle postcode engraving, and assisting the force at community events.

They truly live up to Robert Peel's words that 'The police are the public and the public are the police'. I am indebted to them all.

Youth Engagement

In my Police and Crime Plan, I talk a lot about getting upstream of crime. To engage young people in worthwhile activities to give them something better to do than hanging around on street corners and getting into trouble. The vast majority of our young people are hard working, dedicated and ambitious, a credit to their communities. A minority however, for various reasons, are on the cusp of criminality, or already known to the police.

In 2013 I provided funding of over £220,000 to support young people through a range of positive activities and interventions to reduce the risk of them becoming involved in anti-social behaviour (ASB) and criminality. I have commissioned national charity Catch 22 to

work with Humberside Police and local authorities to reduce youth related crime and ASB through a programme called Positive Lifestyles, aimed at vulnerable young people aged 8-19.

Catch 22 are delivering youth activities in key ASB hotspots. Street dance, football, mobile youth units, portable CAGE football and a mobile climbing wall are just a few examples of the positive activities on offer for young people through the programme. Positive Lifestyles is also highlighting specialist sexual health support to young people in the area.

We have some great young people and it's important we invest in their futures. Catch 22 have an impressive track record of delivering results through these programmes in other areas, and Positive Lifestyles will be the largest youth crime prevention programme in ours.

Our young people are our future. Every pound spent on them can be money well spent. There are not enough positive role models for young people today, having youth workers and support staff will provide excellent role models who can show our young people a more positive way to spend their time, and that there are alternatives to hanging around on street corners. I hope Positive Lifestyles will be something that will last them a lifetime.

Rural Crime

Humberside Police's affiliated 'Farm Watch' recently launched warning signs to criminals who target farms and rural businesses.

It is known most criminals will visit the scene of a potential crime to check it out and return later to break in, or trespass on farm land for poaching or illegal sport such as hare coursing. The signs have been created to inform potential criminals the area is protected by a Farmwatch scheme and they are being watched. Also, each sign has a unique number which can be used by police on the scene to provide instant information from a database about the location such as who the land owner is and their contact details, an invaluable aid when you are in the middle of nowhere!

The signs were funded by me and made by inmates at a local prison, HMP Humber, after I approached the governor with the idea, ensuring those 'on the inside' put something back into our communities.

I have always been a keen supporter of Farmwatch. Since taking office I have seen with my own eyes all they have achieved in reducing crime in their communities at little or no cost but the use of their local knowledge and personal commitment as scheme members. Tackling crime in rural communities needs sustained effort by the community, police and partners working together.

The Future

As we move forward, I will continue to explore every opportunity to bring new innovative ideas to improve policing and the community safety sector, promoting good practice and sharing work with our partners for the benefit of residents.

Our mobile technology programme will allow innovative delivery of policing and maximise the time spent dealing with the public and targeting crime.

I will continue to identify gaps in victim service provision and adopt procedures to fill those areas where vulnerable people are both at risk and need support once they become a victim of crime. I will also invest in getting upstream of crime wherever possible to reduce the number of victims and the impact of crime on the public.

The world is changing; policing must adapt and change with it to serve the public. That will only be achieved through innovation.

Progress against the Police and Crime Plan

October 2014 – ‘Holding the line’

Welcome to my latest performance blog which covers April to September 2014. We’re now six months into the current performance year and Humberside Police are holding the line apart from a spike in crime in Grimsby which is of real concern to me.

I’ve recently had detailed discussions with the force about my concerns. I’m fully aware of all the initiatives with partners to tackle this rise, and I’ll continue taking a keen interest in how this work is expanded as we move forward.

Before I go into more detail about the statistics, let’s remember that reported crime is not purely a measure of police performance, but of society as a whole. The numbers show the crimes reported to the police ... but the real question is what are the police and others doing about it?

There are a few problems with using **only** crime figures as an indicator of police performance – there is the obvious risk of mis-recording crime due to a target-driven culture, and a more fundamental argument against judging police performance by using only crime figures. That’s why I’ve got a range of measures in place ... looking at the ‘numbers’ and also what **you** think about the police and wider criminal justice service.

Do we have a target-driven culture?

Some of you will be aware I’m outspoken in my view that policing nationally has for too long been constricted and even corrupted by a target-driven culture. For years it’s all been about ‘numbers’ and that has sadly stripped away common sense, freedom and confidence for officers to do the right thing.

I’m changing that culture ... I was clear in my Police and Crime Plan after I was elected that I wouldn’t set any numerical targets. I truly believe a focus on targets distorts the system and leads to short term specific reactions based on a desire to keep people such as the national inspectorate, and not necessarily you the public, happy. I am pleased the inspectorate recently found evidence that a target-based performance culture had lessened in Humberside Police. This is great news and a real step in the right direction for our officers, you ... and common sense generally.

As well as all of this, there is a fundamental argument against judging police performance purely through crime statistics.

What do I mean by this?

Just take a look in the newspapers ... they’re obsessed with judging performance on whether crime is higher/lower than some point in the past, where we feature in a ‘league table’, and so on ... they’ve missed the obvious question about whether we’re measuring the right stuff in the first place.

The data I regularly get (and share with you on here) is obviously of great use in helping us all understand the ‘business’ ... but I want to move us far beyond a position of ‘Crime Rising = Police are Bad, Crime Falling = Police are Good’ ... this mentality is unhelpful to everyone.

There are a lot of things that affect crime rates ... just look around you – economic changes, the weather, changes in the law ... the list goes on. None of this can be influenced by the police directly.

Recorded crime rates alone shouldn't define effective police performance ... it only provides you and me with some information about criminal activity. If we now look at the rest of the blog in this context, we should hopefully all start to ask questions and understand the 'picture'.

OUTCOME ONE - REDUCE CRIME

Overall recorded crime

Force wide crime is up 2.3% so far this year (compared to April-September last year).

What does this mean? How does it look in each area?

In Hull it's down 1.2%, North East Lincolnshire is up 10.5%, North Lincolnshire is up 2.4%, and the East Riding is down very slightly at 0.7%.

I'm particularly pleased to see the progress made in Hull. There's been some excellent work between the police, Hull City Council and other partners. This has made a *big* difference to the lives of residents.

But what do local people think?

It's interesting that almost three quarters (72.9%) of you, according to my Community Survey*, really feel crime levels have remained constant over the last twelve months. Of course, some people believe it has risen (roughly 11% of respondents) ... mainly people in North East Lincolnshire.

So what are the police doing to tackle crime at the minute?

The force restructure, which you'll probably have seen in the media recently, is a step in the right direction. The plans unveiled by the Chief Constable will ensure we've got the right number of officers on duty when they are needed ... and in the right places. The investment we've been making, along with the innovation fund from the Home Office, in mobile technology is clearly vital to this new approach.

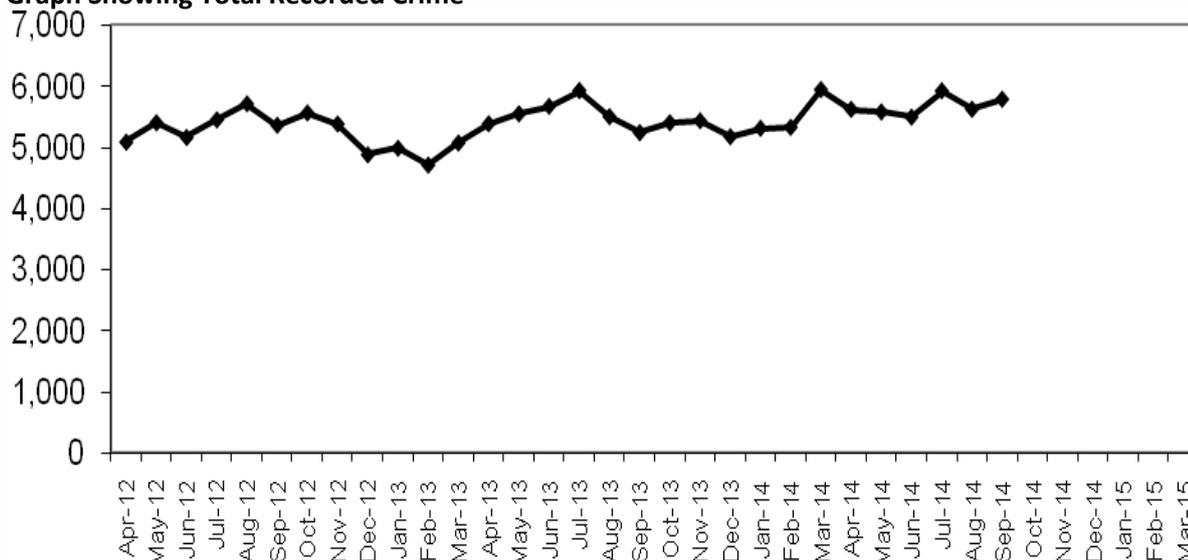
We do however, need to maintain and build on the 'big team' approach to reducing crime ... it's important that your local authorities and partners continue working with Humberside Police as part of that team, sharing good practice and helping to protect the public.

I am concerned that at least a third of all crime involves drugs and/or alcohol in some way ... increasingly alcohol. It is vital that we strengthen and support agencies working with individuals for whom substance misuse is ruining not only their own lives, but creating victims in the process.

	<i>Apr 13 – Sep 13</i>	<i>Apr 14 - Sep 14</i>	<i>Change</i>
<i>Total recorded crime</i>	<i>33,292 crimes</i>	<i>34,045 crimes</i>	<i>753 more</i>

What the figures above show is that despite rises and falls over the last several months (as I mentioned earlier, variations do happen for many reasons including the weather, events, and so on) ... recorded crime has clearly risen compared to the previous year ... it's up around 2.3%.

Graph Showing Total Recorded Crime



We all obviously want to see recorded crime levels come down. The police, partners and public are increasingly coming together to deliver change ... I believe the work we're doing together sets the right foundations to get us back on track. There's much work still to do though.

I'll briefly mention the rises and falls in each local authority area.

Let's look at the level of harm suffered by local people ... in a previous blog I outlined my concerns in Hull. Well ... how things change quickly, as Hull is clearly seeing significant improvements in activity. There has now been clear a swing towards the greatest harm being in North East Lincolnshire (violent crime specifically) ... it's why I mentioned earlier my concerns specifically around Grimsby:

	Apr 12 - Sep 13	Apr 14 – Sep 14	Change
<i>Hull</i>	<i>13,432 crimes</i>	<i>13,272 crimes</i>	<i>Down 1.2%</i>
<i>East Riding</i>	<i>7,172 crimes</i>	<i>7,167 crimes</i>	<i>Down 0.7%</i>
<i>North Lincolnshire</i>	<i>5,098 crimes</i>	<i>5,222 crimes</i>	<i>Up 2.4%</i>
<i>North East Lincolnshire</i>	<i>7,590 crimes</i>	<i>8,384 crimes</i>	<i>Up 10.5%</i>

In my previous blog I mentioned the issue of shed, garage and outbuilding burglaries in Hull. I am pleased that the problem-solving approach adopted by the force, the significant focus, and the hard work of neighbourhood officers has had a really positive impact ... numbers are down significantly.

These sorts of 'opportunistic' crimes (shed and garage burglaries and shop theft) remain a problem, although I think they are now under greater control. To reduce these crimes further, we will all have to play our part by looking after our own security and actively making life difficult for criminals. Please remember to make a record of your property through www.immobilise.com ... this information will be invaluable when investigating theft and working with second-hand outlets.

Many of us keep valuable items in sheds and garages, with bikes and tools left poorly secured or not at all. It amazes me how many of us store valuable bikes (worth thousands in some cases) in sheds with very little security ... you wouldn't store expensive jewellery in a shed fitted with a £5 padlock!

We've also seen spates of damage at allotments recently, and I've been working in some areas to provide funding for cameras for a number of allotment sites.

Regarding shop theft ... Humberside Police's Operation Sodium shop theft initiative continues and has now been rolled-out across the force area. It aims to change the way we all deal with retail crime, so that more offences are prevented within stores, allowing police officers valuable time to be focused on bringing the most prolific offenders to justice and supporting more vulnerable shops. I think it's still too early to see the full impact of this, although over the last six-months (compared to last year) shop theft has remained relatively constant (it's actually down very slightly) ... this tends to indicate the rises we've previously seen are being overturned.

Violent crime

Here's the biggest issue... around half of the rise in crime this year relates to violence **without** injury.

What does this mean?

Violence without injury includes low-level incidents ranging from pushes and scuffles to threatening behaviour on social media ... this is a new type of crime which quite sadly reflects a growing trend where people spend a great deal of their life online. Rises in these reported incidents is pushing overall crime figure upwards.

	<i>Apr 12-Sep 13</i>	<i>Apr 14-Sep 14</i>	<i>Change</i>
<i>Violence with injury</i>	<i>3,496 crimes</i>	<i>3,835 crimes</i>	<i>339 more (9.7% up)</i>
<i>Violence without injury</i>	<i>2,645 crimes</i>	<i>3,299 crimes</i>	<i>654 more (24.7% up)</i>

But what do local people think?

In my previous blog, around two thirds of you (67.7%) considered violent crime to be something which was not a problem in your area ... only 1% felt violent crime was a very big problem in their area.

These perceptions have barely changed over the last year or so.

How does it look in each area?

Looking at the total level of violence against the person suffered in each local area, the main volume is now in North East Lincolnshire, not in Hull as it was previously. In North East Lincolnshire, violence with injury is up by 186 offences and violence without injury is up 319 offences. This concerns me ... the rises are much lower in the other areas.

So ... those are the recorded levels. However, local people (through my Community Survey*) don't really believe that actual violence is rising (only 6% of people actually believe it has risen) ... the majority of people (83.5%) think it has remained static.

I truly believe you're telling me what most people believed already ... in essence we are not experiencing greater violence, but rather we're reporting more of it.

This is no bad thing ... we need to continue encouraging victims to report crimes, especially where the level of harm is highest.

Finally on violent crime ... as I continue to highlight in this blog, let's remind ourselves that the culture of more serious crime and gun crime seen in other parts of the country is not as evident in our area.

Re-offending

The latest 12 month re-offending rate covers the 12 months up to June 2013 there is always a time-lag with this data. The rate is 30.3% up to June 2013, compared to 29.5% previously.

Visibility and accessibility

You constantly tell me that more officers should be out on patrol in the community ... but there will always be administrative duties they need to carry out.

A new generation of mobile technology has begun to roll out to officers in the force.

In the past, officers were pulled-back into police stations as our IT was static and outdated. Sadly, the average person in the street had more information on their Smartphone than our officers were carrying. The new technology we're introducing will bring us into the 21st Century ... more importantly it will increase the visibility and accessibility of officers at a time of reducing staff numbers.

But what do local people think?

My Community Survey shows that 60.3% of the public are happy with the level of police visibility in the last year. I am also pleased that satisfaction with visibility is high amongst our disabled residents.

Over 90% of you also told me you prefer to access the police via telephone ... and around 1 in 5 of you would also like to visit a police station to access police services.

I've listened to what you've been telling me ...

Staff, partners and the public have been telling me what they'd like to see as we re-model policing services locally. One of the key outcomes of this is development of a 'command hub'. This will introduce a new call management system, with triaged demand and priority given to the most important calls, so the police send the right response first time.

I've asked the Chief Constable to carry out a re-examination of our buildings. I want to increase accessibility and availability to all communities, but also at a time when we need to reduce our costs. As part of this, we are working with partners to identify opportunities to share buildings and provide community access points in much more convenient locations.

I've also recently asked people for views on proposals to access several services in one place ... in essence merging the location of several public sector services into one place. Around three quarters (74%) of you agree with this proposal.

OUTCOME 2 - PROTECT THE PUBLIC AND IMPROVE SAFETY

Safety at night

What do local people think?

My Community Survey continues to show that the vast majority of people (97%) feel safe in their local area during the day ... but what about at night?

At night, perceptions are generally lower. However, over the last few months more people are telling me (82.9%) that they feel safe in their local area at night (up slightly from 81.3% previously). The perception of safety is lowest in North East Lincolnshire.

Crime outcomes

The move to Crime Outcomes by the Home Office (as opposed to detections which we previously measured) was welcomed by me. We now have several months' worth of information, which provides an interesting picture. As time goes on, it will help us all to more fully understand – and therefore support or challenge – police activity. I hope the changes demonstrate the hard work the police do and increases public transparency in policing.

One of the things that I am actively encouraging is increased use of community resolutions. Last time I spoke on here, they represented 2% of outcomes. I was certain this would continue to grow as officers were increasingly allowed to use their discretion and take the most appropriate course of action. In the first six-months of this year, community resolutions represented 3.4% of outcomes ... so things are improving albeit slowly.

Outcome data also shows that roughly 2 in 10 offenders received a charge or summons. It also shows that more than 1 in 10 investigations had a named suspect, but that the victim chose to withdraw support from police action. This potentially indicates a need to continue encouraging victims of crime to take action.

Roughly 2.5% of offenders received a caution (down from 4% last year).

Finally ... around 45% of all offences were investigated as far as possible by the police but no suspect could be identified (this was nearer 48% last year). These can be re-opened if further evidence materialises.

OUTCOME 3 - IMPROVE QUALITY OF SERVICE FOR VICTIMS

Domestic violence repeat victims

There were 4.9% more Domestic Violence repeat victims than the previous year. The largest increase was in Grimsby, with a 21.9% increase.

Anti-social behaviour (ASB) repeat victims

The ASB repeat victim rate has fallen to 27.8% (compared to 29.3% last year). Only the East Riding has recorded an increase.

Call answering

The average answer time for 999 calls is around 4 seconds, and around 35 seconds for 101 calls. I am pleased to see a high standard of response to our most urgent requests for services on the 999 number, but there is some improvement needed on non-emergency 101 calls. As part of the force restructure Humberside Police have taken a detailed look at calls to 101 and identified a large percentage of calls which are either not crime related or need signposting to other agencies. The new Command Hub will, when fully implemented, be better equipped to triage these calls and reduce the burden of incoming enquiries leading to an improved response.

Victim satisfaction

My Police and Crime Plan continues to focus on the experience you receive if unfortunate enough to become a victim of crime.

In the twelve months up to June 2014, satisfaction levels have been maintained. Well over 8 out of 10 (85.8%) of victims surveyed are happy with the service received ... this is on par with other forces and has been now for several months.

Satisfaction levels remain highest in North Lincolnshire.

Dealing with the things that matter most

My Community Survey shows a marked improvement in the number of people who believe the police deal with things that matter the most to you ... this is up to 61.4% (from 58.7% previously) ... and is highest in Hull (66.1%).

As I mentioned earlier, the aim is to utilise mobile technology to ensure officers are out in your communities dealing with the things that matter to you.

Confidence in the criminal justice system

Last but not least ... my Community Survey looks at public confidence in the criminal justice system.

People are asked to consider all aspects of the Criminal Justice System (CJS) and give their opinion. In the period April-June 2014, the survey indicated that 83.1% of people hold the police in the highest regard (up from 79.0% previously).

Confidence in other parts of the CJS (Crown Prosecution Service, Prisons, Courts, Probation Service and Youth Offending) has fallen slightly over the last few months according to my community survey. I am looking into the reasons for this change.

***Community Survey**

My Community Survey is a randomly sampled telephone survey of 500 residents per quarter, equally split amongst Local Authority areas, asking their opinions on policing, community safety, and their local area, including what their priorities are for policing services and victims of crime.

Record of PCC's Public Engagements

2014

October

- 6th – Skidby Parish Council
- 10th – Hull - Attended Humbercare Event
- 21st – Hull – Public Meeting – Humberside Police: Building The Future
- 22nd – Thorngumbald Parish Council
- 25th – Bridlington – Street Surgery
- 25th – Hull – Attended RNLI Charity Dinner
- 28th – Scunthorpe - Public Meeting – Humberside Police: Building The Future
- 29th – Market Weighton Town Council
- 31st – Hull – University of Hull lecture
- 31st – Hull – Attended Rank Foundation Event

September

- 9th – Withernsea Town Council
- 13th – Grimsby – Street Surgery
- 17th – Hull – Attended North Carr Area Committee
- 23rd – Goole – Attended Eastgate Residents Association
- 25th – Hull – Neighbourhood Network Awards
- 26th – Hull – Purple Flag Event – Trinity Festival
- 30th – York – Crimestoppers Event

August

- 2nd – Goole – Street Surgery
- 6th – Hull – Attended Hull 2020 Launch Event
- 14th – Bubwith Parish Council
- 18th – Hornsea Town Council
- 22nd – Hull – Visited Coltman St Community Initiative
- 23rd – Hornsea – Street Surgery

July

- 1st – Harpham Parish Council
- 6th – Beverley – Attended Armed Forces Day
- 9th – Pocklington Town Council
- 11th – Hull – Hull CC Ward Surgery – Sutton
- 12th – Crowle – Attended Rescue Day
- 16th – Driffield – Attended Driffield Show
- 22nd – Beverley – Visited Track Fitness & Boxing Club
- 28th – Pocklington Town Council
- 29th – Grimsby – Visited Women's Aid

June

- 2nd – Hull – Visited St Ninian's Community Group
- 4th – Hull – Humber Business Week Crime Prevention Event
- 4th – Grimsby – Attended Rock Challenge Event
- 7th – Grimsby – Attended Rock Challenge Event
- 9th – Hull – Attended Hull & East Riding IAM Event
- 10th – Grimsby – NE Lincs Neighbourhood Watch Meeting
- 14th – Driffield – Street Surgery
- 16th – Hull – Hull CC Ward Surgery – Derringham
- 18th – Hull – Hull CC Ward Surgery – Newington
- 18th – Willerby – Visited Rotary Club of Humberside
- 26th – Holme on Spalding Moor Community Event

May

- 1st – Disability Hate Crime Workshop – Grimsby
- 7th – Operation Lifestyle 2014 Launch Event – Hull
- 13th – ASB/Hate Crime Victim Focus Group – Grimsby
- 16th – Police Volunteer Awards Event - Hessele

April

- 7th – Grimsby – Ward visit – Heneage
- 9th – Hull – Attended LGBT Forum
- 11th – Hull – Hull CC Ward Surgery – Southcoates West
- 12th – Epworth – Attended Community Event
- 15th – Hull – Attended Hull Tenant's Forum
- 15th – Hessele – Hessele Town Council Annual Public Meeting
- 16th – Aughton – National Farmers Union East Riding Meeting
- 17th – Scunthorpe – Mens Probus Group Meeting
- 26th – Kirk Ella – Neighbourhood Watch & Victim Support Event
- 28th – Scunthorpe – Attended Crosby & Park Neighbourhood Action Team
- 29th – Hull – Attended Rock Challenge Event
- 30th – Hull – Attended Rock Challenge Event

March

- 1st - Withernsea – WAW Gym opening event
- 3rd – Bilton – Attended Bilton Social Circle
- 6th – Scunthorpe – Mens Probus 78 Group Meeting
- 7th – Hull – Launch of Hull FC 'Raise Your Game'
- 8th – Crowle – Street Surgery
- 10th – Hull – Hull College Student Event
- 12th – Scawby – Attended Ridge Neighbourhood Action Team
- 19th – Hull – Hull CC Ward Surgery – Bransholme West
- 20th – Grimsby – Positive Lifestyles Celebration Event
- 21st – Hull – Hull CC Ward Surgery – Bricknell
- 22nd – Beverley – East Riding Neighbourhood Watch Conference
- 26th – Hull – Hull CC Ward visit – Marfleet
- 26th – Bridlington – Attended Rock Challenge Event

February

- 7th – Hull – Insurance Institute Dinner
- 8th – Beverley – Street Surgery
- 13th – Hull College Student Question Time
- 13th – Hull – East Hull Neighbourhood Visit
- 20th – Grimsby – Visit to Hope Street Centre
- 20th – Scunthorpe – North Lincs Town & Parish Councils Meeting
- 25th – Grimsby – East Marsh Involve Meeting
- 28th – Willerby – Crimestoppers Event

January

- 6th – Haxey – Attended Haxey Hood Game
- 7th – Grimsby – Street Surgery
- 10th – Hull – Hull Daily Mail webchat
- 11th – Howden – Street Surgery
- 14th – Bridlington – East Riding Pensioners Action Group

2013

December

- 3rd – Waltham Parish Council Meeting
- 6th – Hull & Humber Chamber of Commerce Dinner
- 9th – Willerby – Street Surgery
- 9th – Willerby & Kirk Ella Parish Council Meeting
- 11th – Grimsby – ‘Let’s Talk North East Lincolnshire’ Event
- 14th – Bridlington – Street Surgery

November

- 6th – Woodmansey – Neighbourhood Watch meeting
- 7th – Hull – Disability Hate Crime event
- 7th – Brigg – North Lincs Country Watch AGM
- 8th – Hull – Children’s University Breakfast event
- 8th – Hull – KC Stadium ‘Playing For Success’ event
- 8th – Scunthorpe – Blue Door Centre launch event
- 10th – Beverley – Remembrance Day service
- 11th – London – Business Services Association dinner
- 12th – Hull – Lifestyle Awards event
- 13th – Bransholme – Street Surgery
- 18th – Burstwick – NFU Branch meeting
- 19th – Brigg – Street Surgery
- 23rd – Hull – Street Surgery
- 25th – Grimsby – Street Surgery
- 28th – Scunthorpe – N. Lincs Community Champion Awards
- 29th – Goole – Eastgate Residents Association
- 30th – Scunthorpe – Street Surgery

October

- 3rd – Scunthorpe – Communities Advice Centre Event
- 3rd – Laceby – Residents Association Meeting
- 4th – Grimsby – EngAge Question Time Event
- 5th – Brigg – Street Surgery
- 7th – Hessle – CIMA Event
- 9th – Newport Parish Council meeting
- 10th – NE Lincs Town & Parish Council Liaison Ctte
- 15th – Hornsea – Let's Go Hornsea AGM
- 16th – Beverley Town Council meeting
- 21st – Withernsea Town Council meeting
- 25th – Hull – Sirius Academy Lecture and Q&A
- 26th – Bransholme Police Station Open Day

September

- 2nd – Cleethorpes – Summer Arts College Event
- 4th – Willerby – Insurance Institute Presentation
- 6th – Hessle – Business Crime Reduction Event
- 7th – Hessle – Street Surgery
- 11th – Hull – Neighbourhood Network AGM Event
- 12th – Laceby – Neighbourhood visit
- 19th – Epworth – Neighbourhood Tour
- 21st – Bridlington – Street Surgery

August

- 3rd – Hull – Street Surgery
- 3rd – Little Weighton Carnival
- 12th – Hornsea Town Council meeting
- 15th – Brough & villages – Neighbourhood Tour
- 21st – Webchat – Grimsby Telegraph
- 21st – Market Weighton Town Council meeting
- 24th – Goole – Street Surgery
- 27th – Goole – Neighbourhood Tour
- 27th – Grimsby – East Marsh Involve meeting
- 30th – Immingham Amateur Boxing Club
- 31st – Grimsby Pride event

July

- 4th – Pocklington & Rural – Neighbourhood Tour
- 7th – Howden – Howden Show
- 13th – Rescue Day – Crowle
- 14th – Community Day – Market Weighton
- 16th – Winterton Town Council meeting
- 17th – Driffield Show
- 18th – Grimsby West Marsh – Neighbourhood Tour

- 21st – Hull Pride event
- 23rd – Haxey & South Isle Parish Council meeting
- 25th – Immingham – Neighbourhood Tour
- 31st – Bubwith mobile Skatepark

June

- 2nd – Hull – Community Hub opening
- 9th – Cleethorpes – Multi-Cultural Festival
- 13th – Willerby, Anlaby & Kirk Ella – Neighbourhood Tour
- 15th – Beverley – Street Surgery
- 17th – Willerby – Insurance Institute Meeting
- 19th – Humberside Police Diversity Day – Hull
- 20th – Scunthorpe (Crosby & Park) – Neighbourhood Tour
- 21st – New Life Church – Scunthorpe
- 22nd – Evening Licensing Walkabout – Driffield
- 25th – Brigg & Wolds – Neighbourhood Tour
- 27th – Kirk Ella – Neighbourhood Watch Meeting
- 29th – Scunthorpe – Street Surgery

May

- 2nd – Hull University Students Union
- 4th – Pocklington – Street Surgery
- 7th – Recovery Champions Awards - Scunthorpe
- 8th – Community Day – Holme on Spalding Moor
- 9th – Driffield & Rural – Neighbourhood Tour
- 18th – Bransholme – Street Surgery
- 22nd – Hedon – Neighbourhood Tour

April

- 2nd – Hull FC Community Foundation
- 2nd – Driffield Town Council Meeting
- 4th – Hull – Visit to The Warren Project
- 6th – Grimsby East Marsh – Street Surgery
- 8th – Bonby Parish Council Meeting
- 12th – Hull Bid Old Town evening visit
- 13th – Hedon – Street Surgery
- 18th – Wolfreton School – Student Meeting
- 26th – Hull Avenues – Neighbourhood Tour

March

- 4th – Hull – Public Meeting
- 5th – Brumby – Neighbourhood Tour
- 7th – Hull Beverley – Neighbourhood Tour
- 7th – Beverley – Public Meeting
- 9th – Kingswood – Street Surgery

12th – Grimsby Sth & Ctrl – Neighbourhood Tour
14th – Barton – Neighbourhood Tour
21st – Ashby – Neighbourhood Tour
22nd – Hull Pickering – Neighbourhood Tour
26th – Hessle – Neighbourhood Tour
27th – Bransholme – Neighbourhood Tour

February

12th – Cleethorpes – Neighbourhood Tour
14th – Withernsea – Neighbourhood Tour
19th – Hornsea – Neighbourhood Tour
19th – Bridlington – Neighbourhood Tour
23rd – Cottingham – Street Surgery
28th – Howden – Neighbourhood Tour

January

5th – Driffield Street Surgery
10th – Grimsby Telegraph Online Debate
16th – Brigg – Meet North Lincolnshire Country Watch
26th – Bridlington – Street Surgery
29th – Hull Myton – Neighbourhood Tour
31st – Beverley – Neighbourhood Tour

2012

December

1st – Goole – Street Surgery
8th – Hull – Clough Road Police Station – Public Open Day
11th – Brigg – Street Surgery
20th – Scunthorpe – Street Surgery and meet NPT

November

22nd – Grimsby, East Marsh – Meet NPT and local community groups.
29th – Grimsby, Freshney Place Shopping Centre – Street Surgery

Note



Date: 21 November 2014
Subject: **PCC – HMIC ISSUES**

Purpose and contents

1. This note deals with a number of the observations and objections which have recently been made by or on behalf of police and crime commissioners (and other local policing bodies) in relation to the work of HMIC. Its purpose is to provide a fuller understanding of the part which HMIC plays in policing and the nature and extent of its work.
2. The subjects covered by this note are:
 - (a) HMIC's place in the policing landscape (paragraphs 3 - 21);
 - (b) the 'burden' of inspection (paragraphs 22 - 31);
 - (c) annual all-force inspection programme (PEEL) (paragraphs 32 - 36);
 - (d) recommendations (numbers and cost) (paragraphs 37 - 41);
 - (e) naming of forces in HMIC reports (paragraphs 42 - 44);
 - (f) scope of inspections (paragraphs 45 - 48);
 - (g) crime prevention, attendance and use of police time (paragraphs 49 - 51);
 - (h) removal of chief constables (paragraphs 52 - 54);
 - (i) PCC responses to HMIC reports (paragraphs 55 - 60);
 - (j) conclusions (paragraphs 61 - 63).

HMIC's place in the policing landscape

3. It has been said that HMIC fails to understand its correct position in the landscape of policing institutions and bodies, and sometimes acts in ways which are contrary to the policy of the Government.

4. The short answers to this objection are:

(a) HMIC has no misapprehension as to its statutory position, both in its own terms and in its relationship with police and crime commissioners, the police forces it inspects, the Home Office, the College of Policing and others; below is an explanation of what that position is;

(b) HMIC is independent of Government, police and crime commissioners, police forces and every other external executive institution and body; it is politically neutral, and discharges its statutory remit in accordance with the law, not politics.

3. HMIC stands today where it has always stood. It was established in 1856 to inspect police forces and report on their efficiency and effectiveness. That has not changed in any appreciable respect. Its role in chief officer appointments has been abolished. It does not inspect police and crime commissioners as it did police authorities. Its lines of reporting to Parliament have been enhanced, as has its independence. But its core job has not changed.

4. The landscape of policing around HMIC has changed a great deal, and of course that cannot and must not be disregarded. The most significant single change is the replacement of police authorities by police and crime commissioners, established by Parliament as the principal mechanism of public accountability of the police. The National Crime Agency has replaced the Serious Organised Crime Agency, and the College of Policing has taken over from the NPIA. As with police and crime commissioners, these are not like-for-like replacements. These new institutions have different, usually enlarged, powers and responsibilities. This is especially the case with police and crime commissioners.

5. Police and crime commissioners have predominantly local roles, and being democratically elected they are directly accountable to the people in their

police areas. Police and crime commissioners also have national responsibilities, for example under the Strategic Policing Requirement. And of course in matters of interoperability, police and crime commissioners need to work together, just as police forces must, in particular in cases of technical systems and the prompt, adequate and effective dissemination and accessibility of reliable intelligence and other information.

6. Every entity in the policing landscape has the common objective of making policing better. That is the responsibility of the Home Office, police and crime commissioners, the College, chiefs and the NCA (who are of course the ones who have to improve policing in operational terms), and HMIC. Although each has the same objective, Parliament has provided different sets of tools with which that objective is to be pursued and attained.

7. The complementary nature of the statutory remits of police and crime commissioners and HMIC is most apparent from a comparison of the relevant statutory provisions. Section 1(6)(b) of the Police Reform and Social Responsibility Act 2011 requires the police and crime commissioner for a police area to "secure that the police force is efficient and effective". Section 1(8) contains further detail in this respect. Section 54(2) of the Police Act 1996 requires the Inspectors of Constabulary to "inspect and report on the efficiency and effectiveness of every police force maintained for a police area". Sections 54(4) and 54(4A) of the Police Act 1996 require the chief inspector of constabulary every year to lay before Parliament a copy of his report on the carrying out of inspections, and provides that the report must "include the chief inspector's assessment of the efficiency and effectiveness of policing in England and Wales for the year in respect of which the report is prepared".

8. Both police and crime commissioners and HMIC are therefore concerned with police efficiency and effectiveness; police and crime commissioners must secure them (using the powers provided to them by Parliament), and HMIC must inspect and report on them. There is no conflict.

9. Police and crime commissioners have hard power, whilst HMIC has soft power.

10. The hard power of police and crime commissioners is principally in their power to set the policing budget, establish police and crime plans, and hire, fire and decide on the renewal of the terms of office of chief constables. These are

very considerable powers, given to police and crime commissioners by the community for whose benefit policing exists, to be exercised on its behalf.

11. By contrast, HMIC has soft power; that power is in its voice. It has a statutory obligation – not a discretion – to inspect and report on the efficiency and effectiveness of the police. Those reports must be published (with very narrow, but important, exceptions).

12. HMIC's inspection programme for each year must be approved by the Home Secretary. In addition, HMIC may be commissioned by the Home Secretary to carry out additional inspections. A commission from the Home Secretary cannot be refused. Police and crime commissioners also have the power to commission inspections by HMIC. In addition, HMIC has the power to inspect on its own initiative.

13. HMIC carries out its inspections independently. There are no political considerations in the criteria which HMIC applies. No political entity, police chief, institution or organisation has the right or the power to control the content of an HMIC report. That independence of judgment is essential to the objectivity as well as the authority of the Inspectorate. It will never be compromised.

14. It follows that objections to the effect that HMIC makes recommendations which are contrary to Government policy – if in fact they are – are not on point. HMIC has no political position; it is concerned solely with establishing the facts in relation to the efficiency and effectiveness of police forces, analysing and making judgments about them, reporting and providing recommendations.

15. In relation to what is done with HMIC's recommendations, it should be remembered that HMIC is not a regulator. Regulators have powers of intervention, direction and enforcement; inspectorates do not. As said, an inspectorate has the power of its voice and the authority with which that voice is used. It is for chief officers, police and crime commissioners, the Home Secretary and others to decide what action is taken on HMIC's reports and the recommendations they contain. HMIC's recommendations are not orders.

16. HMIC of course recognises and understands that local circumstances must be taken fully into consideration when chief officers are faced with deciding how HMIC's recommendations are to be implemented. In most cases, HMIC's recommendations specify the outcome which should be achieved, not the

methods to be used. But they also recognise – as must be recognised – that there are not 43 different best ways of doing the same thing. Sometimes this is incorrectly criticised as centralization; in reality, it is no more than an acknowledgement of fact.

17. To take some examples, for a very long time, in the policing of homicide, the investigation of road deaths and the use of firearms, the police have had a single standard operating procedure. In other areas of policing, the police service – now through the College of Policing – has established Authorised Professional Practice, and forces are expected to apply it. Section 39A of the Police Act 1996 empowers the College to issue codes of practice relating to the discharge of the functions of chief officers if it considers (amongst other things) that "it is necessary to do so in order to promote the efficiency and effectiveness of police forces generally". Under that section, chief officers must have regard to those codes.

18. Just as chief officers are not legally obliged to implement HMIC's recommendations on matters of efficiency and effectiveness, nor are they required to implement every aspect of codes of practice or APPs issued by the College. They have operational independence. However, a chief officer would have to have a very good reason for disregarding either. And under the statutory scheme – the Police Act 1996 (in relation to HMIC), the Police Reform and Social Responsibility Act 2011 (in relation to police and crime commissioners) and the Anti-Social Behaviour, Crime and Policing Act 2014 (in relation to the College) – the chief officer would almost certainly face criticism and possibly lawful pressure from his police and crime commissioner if he were to do so without such a compelling reason.

19. Standardisation of best practice is not inimical to local accountability. Indeed, it is suggested that local people would be concerned if, in any of these areas, standards lower than the established national ones were to be applied.

20. HMIC has not and will never over-reach its statutory remit or powers. Through its structure of regional HMIs, it will always, to the full extent appropriate and necessary, take into consideration local conditions and circumstances. Part of that local focus is of course the police and crime plan, required and authorised by statute. Police and crime plans are regarded by HMIC as highly important parts of the policing matrix of accountability; that is principally because that is the status which Parliament has conferred upon them.

Section 8 of the Police Reform and Social Responsibility Act 2011 imposes upon each chief officer a duty to have regard to the police and crime plan for his police area. Accordingly, every inspector sent in to a force by HMIC will have read and be familiar with the parts of the local police and crime plan which concern the matter under inspection.

21. For the reasons given above, the policy and purposes of the statutes which Parliament has passed creating and empowering police and crime commissioners and HMIC are consistent with one another and do not clash; both can and must be honoured.

The 'burden' of inspection

22. From time to time, it is objected that the 'burden' of inspection is too great, and that police forces cannot reasonably be expected to cope with the extent of inspection which HMIC carries out.

23. As explained in paragraph 12 of this note, the nature and intensity of inspection is principally a function of the annual inspection programme which is approved by the Home Secretary, and the further commissions which the Home Secretary gives to HMIC. In some forces, inspection activity is increased by the police and crime commissioner having asked HMIC to do one or more force-specific inspections. Almost no inspection work is a result of HMIC carrying out inspections on its own initiative.

24. That said, we are conscious and sensitive to the expressed concern. We know that inspections have an effect on the resources of the police force in question. We will, as far as reasonably practicable, streamline our inspection work so as to create the lightest draw on the resources of the police forces in question. However, as explained, it is Parliament – not HMIC – which has prescribed that there must be inspections to facilitate the effective operation of local as well as national accountability. We believe very few, if any, chief officers would argue that inspection and accountability are unnecessary or impertinent. And if they were to do so, they would be in contradiction of the settled will of Parliament.

25. In all but exceptional cases, the information which HMIC asks police forces to provide is information which the force should already have. A properly managed and led police force should know the condition, capacity, capability,

performance and security of supply of its assets, the demands which are likely to be placed on those assets, the resources the chief officer has to meet those demands, and the efficiency and effectiveness with which those assets are deployed. That is what is required of all asset-intensive, safety-critical, monopoly public services; it is no less true with the police.

26. In too many cases, we come across instances of relevant documentation being hurriedly produced by chief officer teams immediately before an HMIC inspection, to be presented as force policy or evidence of force activity in a particular respect. In all but the most exceptional cases, this should not happen. If the force lacks information which it should already have, that is not the fault of the inspection regime. It is part of the function of the inspection to establish in which respects the force is failing.

27. HMIC has the power to do unannounced inspections. HM Inspectorate of Prisons operates on this basis in almost every case. HMIC will give consideration to increasing the use of unannounced inspections, thereby allowing forces to avoid inappropriate levels of last-minute preparation for visits by inspectors.

28. The case for standardisation of information held by forces is a strong one. Recommendation 49 of the 2012 Home Office-commissioned report into the pay and conditions of service of police officers and staff¹ was in the following terms:

"HMIC, in consultation with police forces, the Police Professional Body [now the College of Policing] and the Home Office, should establish a national template for a force management statement which should be published by each police force with its annual report. The force management statement should contain consistently presented, reliable data about the projected demands on the force in the short, medium and long terms, the force's plans for meeting those demands, including its financial plans, and the steps it intends to take to improve the efficiency and economy with which it will maintain and develop its workforce and other assets, and discharge its obligations to the public. Each force management statement should also contain a report, with reasons, on the force's performance in the last year against the projections made for that year in the last force management statement. Exclusions should be permitted on security grounds."

¹ Independent Report of Police Officer and Staff Remuneration and Conditions, Final Report, HMSO, London, Cm 8325-1, March 2012

29. It is HMIC's intention to implement that recommendation; in doing so, we will of course include police and crime commissioners in the consultation process. This will be done as part of the PEEL programme of all-force annual inspections (see paragraphs 32 - 36 of this note).

30. Force management statements will have the considerable advantage, to all concerned, of allowing forces and others to know every year what information needs to be held, and the form in which it should be held. They should therefore materially reduce the ad hoc production of information which forces sometimes do.

31. In addition, we are discussing with forces the proposition that HMIC should have direct online access to their information systems so that we can obtain the information needed for an inspection without any involvement or intervention of the force in question.

Annual all-force inspection programme (PEEL)

32. As police and crime commissioners of course know, late last year the Home Secretary asked HMIC to devise a regime of annual force inspections to assess and report on the efficiency and effectiveness of forces in a range of core policing functions. This work is well under way, and we greatly appreciate the constructive engagement we have had from police and crime commissioners, forces, the College of Policing and others in this work.

33. The PEEL programme (police efficiency, effectiveness and legitimacy) is likely, over time, to reduce substantially the number of thematic inspections which HMIC does. This is of course a function of the requirements of the Home Office and the Attorney-General, but our expectation – and theirs – is that much of what would have been covered by thematics will now be covered by PEEL, and so the number of thematics will reduce a great deal.

34. There is of course a transition period in which we carry out the first PEEL inspections and at the same time must complete the present consignment of thematic inspections.

35. It is our belief, and that of the Home Office, that the PEEL inspections will considerably assist police and crime commissioners in their statutory functions

of holding chief officers closely to account for the discharge of their functions. They are being designed with that objective very much in mind. They will also enable the public in each police area to see how well their force is performing. That too is a crucial part of the new accountability regime which Parliament has created.

36. It has also been objected that as HMIC has already been carrying out the PEEL inspections for 27 November 2014, the consultation which closed on 12 September 2014 was pre-judged. This is not so. The consultation in question concerned the PEEL inspection which will report in November 2015. The 27 November 2014 PEEL report is not the subject of that consultation, and had to be proceeded with in parallel with the consultation on the November 2015 one. As said, the consultation does not concern the 27 November 2014 report, and the two should not be confused. In settling on the design of the November 2015 PEEL inspection, we shall of course take fully into consideration all the pertinent responses we received in the consultation, as well as experience in the 27 November 2014 PEEL programme.

Recommendations – numbers and cost

37. It is sometimes said that HMIC makes too many recommendations, and that it should cost them. We respectfully disagree.

38. Recommendations are made where we find failings which need to be corrected, and respects in which a force must improve in order to achieve the highest reasonably practicable level of efficiency and effectiveness. We will only make recommendations in these cases. The fewer and less severe the failings and other shortcomings we uncover, the fewer and less onerous will be the corresponding recommendations.

39. If a police and crime commissioner were adversely to criticise the numbers or nature of HMIC recommendations, that is his or her prerogative. A large number of recommendations in an HMIC report will be a mark of shortcomings of the force in the specified respects, and of course it is the obligation of the police and crime commissioner to ensure that the force does not fail. In doing so, the police and crime commissioner has the powers conferred by Parliament, limited by Parliament.

40. If the police and crime commissioner were to purport to decide and direct the chief constable as to which HMIC recommendations are to be implemented, or the extent of their implementation, and the recommendations concern operational matters (which a high proportion of them do), the police and crime commissioner would be at material risk of entering into the area in respect of which Parliament and the common law have given chiefs operational independence. Police and crime commissioners are not regulators either.

41. In relation to costing recommendations, we do not believe this is a sustainable proposition. It is for forces, not HMIC, to be in charge of the deployment of their resources, and to find the best ways of achieving higher efficiency and effectiveness. Moreover, and more significantly, forces are being paid now to prevent crime, protect the public, maintain and restore order and apprehend offenders. In all but the most exceptional cases, HMIC's recommendations concern how forces discharge these obligations efficiently and effectively. It follows that there should be no question of a chief officer telling his or her police and crime commissioner that higher efficiency and effectiveness are only available at a higher price, when it is HMIC's determination that these levels of efficiency and effectiveness are attainable at the same price. In some cases or respects, they may even be attainable at a lower price.

Naming of forces in HMIC reports

42. It has been suggested that HMIC has a practice in its reports of only naming forces when favourable criticism is being provided, and not where the findings are adverse. This is not correct. We do – and will continue to – name forces whose performance is being adversely criticised. In almost all cases with thematic inspections, we produce a national report and a separate report for each force.

43. It should be noticed here that the PEEL programme provides HMIC with a greater opportunity to report favourably on force performance. This is because its scope is wider than the aggregate of the current programme of thematics, and also because, unlike thematics, it is not an inspection prompted by something known already to have gone wrong or strongly suspected to be about to go wrong.

44. Getting the media to report the good as well as the areas which require improvement is never easy. We hope that providing police and crime

commissioners with advance notice of the contents of inspection reports, including PEEL assessments, will assist in their efforts to ensure the media and therefore the public are well-informed of the balance of favourable and adverse criticism.

Scope of inspections

45. From time to time, it is said that HMIC unduly restricts its inspections to the police, particularly in cases where the acts or omissions of other agencies of the state – such as those concerned with social services, health and education – may have a material effect on the public interest objectives of preventing offending and dealing with its consequences.

46. It is undeniable that the causes of crime are many and often complex. Those causes often do have close connections to the principal concerns and jurisdictions of other agencies.

47. Parliament has confined HMIC's remit to the inspection of the police. We cannot and should not try to over-reach that jurisdiction; to do so would be improper, illegal and an undue stretch of our resources. If Parliament changes the law and confers a wider jurisdiction on HMIC, we will of course discharge those additional obligations.

48. It should also be mentioned, however, that our joint inspection programme is a very active and wide-ranging one. We carry out inspections jointly with the other criminal justice inspectorates – those for prosecution, prisons and probation – and also with OFSTED and the Care Quality Commission. We are presently engaged in the finalisation of a concordat with all of those inspectorates, to ensure the greatest practicable co-operation, efficiency and effectiveness on our parts, and the minimisation of the demands which those joint inspections place on the entities which are being inspected.

Crime prevention, attendance and use of police time

49. Our report into the core business of the police, published on 4 September 2014, has been criticised by at least one police and crime commissioner for being unduly prescriptive and insensitive to local needs and circumstances. The remarks of the chief inspector of constabulary in relation to the effects of austerity have also attracted adverse comment.

50. Paragraphs 16-21 of this note deal with the issue of local circumstances and national standards of best practice.

51. In relation to austerity, the chief inspector of constabulary said that he did not consider that the report's criticisms of the quality of response and investigation of offences were *principally* attributable to austerity. It is clear that budget constraints require chief officers to establish systems of prioritisation when calls for service are made by the public, with the most serious matters properly receiving the greatest and most urgent attention. That has always been the case. He added that the public are entitled to have their crimes adequately investigated, and that does not always mean that police officers must attend. He made it clear that it is for local people, through their police and crime commissioners and their police and crime plans, to state their expectations in relation to police attendance and the system of priorities which should be operated. It is of course a matter for the operational judgment (and independence) of the chief officer how that is accommodated, having regard to the police and crime plan.

Removal of chief constables

52. It has been suggested that HMIC believes that it is the chief inspector of constabulary and not the relevant police and crime commissioner who makes the final decision on the dismissal or forced resignation of a chief constable under section 38 of the Police Reform and Social Responsibility Act 2011, and that the chief inspector's judgment on the matter should be substituted for that of the police and crime commissioner.

53. This is certainly not the case. It is entirely clear from the statute that the decision under section 38 is for the police and crime commissioner alone to make. However, before doing so, Regulation 11A of the Police Regulations 2003 provides that if a police and crime commissioner is proposing to call on a chief officer to retire or resign under section 38, he or she must first obtain the views of the chief inspector of constabulary in writing and have regard to those views. There are other procedural requirements, ending with an obligation to give the chief officer a written explanation of the reasons why the police and crime commissioner still proposes to force his or her removal. That explanation should, in our view, also address any matters which the chief inspector of constabulary has raised in his report to the police and crime commissioner,

particularly if they are matters which stand against the proposal to force the chief officer out.

54. However, there is no doubt at all that the final decision is for the police and crime commissioner to take. Any notion that HMIC believes that it is open to the chief inspector of constabulary to substitute his decision for that of the police and crime commissioner is, with respect, entirely misconceived.

PCC responses to HMIC reports

55. HMIC has received an increasing number of enquiries in relation to the requirement for police and crime commissioners to respond to reports published by HMIC. The Home Office sought to provide clarity on this issue, and police and crime commissioners received letters about this from Home Office officials in March 2013 and July 2013. These letters confirm the requirement that each police and crime commissioner must respond to all HMIC published reports, including those that involve other inspectorates, which:

- (a) refer to their individual force area; and/or
- (b) include recommendations or highlight issues for the entire police service, even if the force area of the police and crime commissioner in question is not specifically named.

56. As you of course know, section 55 of the Police Act 1996 requires police and crime commissioners to publish their comments on HMIC reports, although there is no requirement for these to be sent to HMIC, only to the Secretary of State. However, to assist the public, where HMIC is aware of a published response, we will put on our website a link to the relevant report and the police and crime commissioner's comment. To help with this, your responses can be sent to PCC@hmic.gsi.gov.uk.

57. It has also been suggested that the response of each police and crime commissioner to an HMIC report should be included in the report itself, perhaps as an annex. Unfortunately, we do not think this is either an appropriate or a practicable proposal.

58. The Police Act 1996 provides for HMIC to publish a report of its findings. The statute provides separately (section 55(5)) for police and crime

commissioners' responses to be published "in such manner as appears to the [police and crime commissioner] to be appropriate". The section says that the police and crime commissioner must also publish comments from the chief officer on the report and the police and crime commissioner's comments on those comments.

59. It is clear that the two publications are intended by the statute to be separate. Moreover, waiting for three sets of comments on an HMIC report would in almost every case materially delay the production and publication of the report. We do not consider this to be practicable.

60. The better approach, we suggest, is for HMIC to include on its website either a copy of your response (and that of the chief officer), or a link to your website on which those further documents can be found.

Conclusion

61. We hope that these answers and explanations provide you with a fuller understanding of HMIC's position in the new policing landscape and the nature and extent of its work.

62. The Inspectors of Constabulary remain willing to discuss with you any matter of uncertainty or concern which you may have.

63. We are committed to ensuring that effect is given to the will of Parliament, as expressed in its legislation, and that includes its intention that the new model of local police accountability is a success.



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7 August 2014

Dear *Tom*

Consultation on the HMIC proposed programme for regular force inspections

Thank you for consulting with me on the development of the PEEL programme as outlined in your letter dated 7 July 2014. Whilst both the HMIC and I are fully committed to providing the best possible policing service I have a few areas that require further clarification and I would be grateful for your response. I am obviously happy to meet in person to discuss my initial observations as detailed below.

Local versus National – Conflict of Priorities

There is real danger that the focus of the proposed inspection regime will conflict with the objectives and intent I have already established within my Police and Crime Plan. You will appreciate that the statutory responsibility for setting local policing priorities sits with me as Police and Crime Commissioner. My concern is that a police service that is already under-going a constricting budget, amounting to almost 30% in real terms by the end of the CSR period, will be placed in the invidious position of having to decide whether to follow the priorities of my Police and Crime Plan or to meet the potentially conflicting priorities that are implicit in the proposed PEEL inspection regime. The impact of not achieving either will be significant and ultimately lead to reduced public confidence in the force, which can have local, regional and long lasting results.

It might be helpful if I give an example that illustrates my point. HMI Roger Baker recently wrote to my Chief Constable, Justine Curran, highlighting his concerns about recent increases in some categories of recorded crime in Humberside. Indeed the force is now 'on watch' as a consequence. Amongst his concerns was an increase in bicycle theft. In drawing up my Police and Crime plan I consulted widely and carefully with local people and they made it very clear that they want the force to concentrate its efforts on those crimes that cause the greatest harm to our communities. It will come as no surprise to you to learn that bicycle theft does not anywhere feature as a priority but your HMI's focus places the force under pressure to divert resources into this area of activity if the force is to avoid being deemed to be a poor performer. Given the PEEL process will focus significantly on crime performance this gives me a real cause for concern.

At the very time when the public are beginning to embrace the concept of a Police and Crime Commissioner as their elected representative who tackles the totality of policing; including local, regional and national policing issues along with the wider “and crime” dynamic with other partner organisations there is potential for members of the public to become confused and think there are two masters, i.e. the Commissioner and HMIC.

Frequency, Validity and Costing of Inspections

I am concerned that the police are being forced to endure a disproportionate level of inspection activity, especially when compared to our partner organisations. I truly believe the proposed regime will create an ‘imbalance’ of inspection activity and add to the burden of inspection that the Force already faces.

I envisage it becoming increasingly difficult for forces nationally to provide the resources necessary to furnish all future requests by HMIC, especially given the climate we find ourselves in financially. The practical reality of the hidden costs; in terms of time, money and people, will create an extra layer of bureaucracy whilst distracting us from focusing on our key requirement, which is the actual delivery of a service to the public.

I believe there is a case for continuing with a themed inspection approach, albeit one reduced significantly in size and focused on the things that matter most to local people. At present HMIC is in the position of being able to make significant recommendations without having to consider the consequences of resourcing them. In my opinion this paradigm of power without responsibility is not sustainable in an environment of contracting resources and cannot be in the public interest. I and many of my fellow Commissioners need to see a significant shift in that all future HMIC report recommendations are costed by HMIC. This would allow my Chief Constable to determine a legitimate response in light of financial viability and local need. To aid public accountability, it would also be beneficial for HMIC to provide details of the cost of individual inspection activity. This would provide transparency to the public surrounding the wider inspection regime and the cost of policing. This is incredibly important, especially as I need to justify the precept and the value for money they receive across the spectrum of police and crime.

Subjectivity, Public confidence and Reputational Risk

In respect of the sixteen questions that HMIC propose asking, they appear perfectly valid and generally cover the right areas of police (but not ‘policing’) activity. However, there is potential for the answers to be very subjective, not to mention the variance in the evidence requested and/or provided. If HMIC intend pursuing the PEEL process in its current form, I would advise a national framework to provide consistency in the evidence required.

With respect to the proposed grades of outstanding, good, requiring improvement and inadequate; I would like to see a fifth grade of acceptable added. Currently, the four grades offered mean that a force is either above or below the average benchmark, when on pure statistics I would expect the majority to be on the average. Yet there is currently no provision for this grade. We have seen at first hand the destructive consequences of this grading scheme in the education sector.

Weighting of issues and scoring of evidence is still unclear. The framework mentioned above would assist, however, we need to understand if there is a particular weighting behind certain questions or areas of service. For example; does a low score in one area result in an automatic “requires improvement” grade irrespective of other areas? I am particularly concerned that crime figures will weigh disproportionately in the overall judgements that will be made, especially given the recent focus of your regional HMI in this area.

Again, mentioned above, public confidence in the police service is critical. The force is part of the community and as we drive down officer and staff numbers we must maintain that public confidence if they are to play their part in keeping their neighbourhoods safe. There is real danger that subjective and unbalanced grades could cause long term loss of confidence just as we need it the most. Through my local surveys and discussions the public have real confidence in Humberside Police and feel they are a credit to their communities. I would not want to see this lost due to subjective interpretations.

Consulting the Public

I have significant concerns around HMIC undertaking further local public consultation. My concerns range from the cost of your proposal through to the fact that my role locally is to regularly undertake consultation with local people. This is something that I do all the time in order to understand what people want and inform my local priorities.

I would welcome an opportunity to engage with you further regarding this area to avoid a serious duplication of effort and hence unnecessary cost and confusion to the public.

Management Statements

I support the idea of a focused Force Management Statement.

This will provide a further mechanism for me to legitimately hold the Force to account. However, unlike other publications such as my Annual Report, the statement should not be public-focused. It must concentrate on delivery of policing against the objectives set out in my Police and Crime Plan.

Spreading Best Practice

I note that HMIC will be commenting on what is being done locally by the police. My hope is that you will also focus on what is not being done, along with reasons and suggestions as to how things could be changed accordingly. Best practice exists within the police service and HMIC should be one of the conduits for this, possibly via the College of Policing.

Conclusion

With the election of Police and Crime Commissioners, the 920,000 members of the Humberside force area now have a known and recognisable voice that is engaging on local issues and starting to provide a coherency amongst the previously disparate strands of police, health, education, victim services, prisons and offender rehabilitation to name but a few; to ensure that we reduce duplication and costs whilst improving local delivery of services. I challenged my Chief Constable to re-think the delivery of policing within the pan-Humber area as a result of the budget restrictions and to ensure that the local population receive the best possible police service. This is all captured within my Police and Crime Plan.

I would welcome an opportunity to discuss further the potential methods of implementing the PEEL process in a way that compliments and builds on my Police and Crime Plan through local initiatives and delivery across the spectrum of domains, whilst maintaining that vital public confidence.

I look forward to hearing from you and in conjunction with my Chief Constable taking forward the PEEL process.

Yours sincerely

Matthew Grove

Matthew Grove
Police and Crime Commissioner for Humberside

cc Rt Hon Theresa May MP, Home Secretary
cc Police and Crime Panel members

Tom, I have very recently received a further HMIC letter dated 5TH August regarding the interim inspection in September. It would appear that the methodology for the PEEL process has already been adopted, despite the fact that I understood we were still in the consultation stage!
Grateful for your thoughts on this.



The Office of Matthew Grove

Working hard to keep you safe

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Our ref: MG/MS/2014

2 October 2014

Dear Home Secretary

HMIC Inspection Report – Core Business

I am writing to you with my comments on the HMIC report entitled “Core Business”. I have also copied The Rt Hon Mike Penning MP following the recent arrival of his letter dated 25 September 2014 in response to my reply to the HMIC Responding to Austerity report.

The report makes suggestions for areas of improvement as well as identifying good practice in the Humberside Police area. I am pleased to see that in many of the generic areas highlighted Humberside Police are already well on the way to achieving significant improvements. There are some areas which need attention and I am content that these are being addressed.

The report itself is over 160 pages long and there are 40 recommendations, none of which are costed. I will of course hold the Chief Constable to account regarding those recommendations which help maintain the quality of service to the public. Some of the national recommendations are, in my opinion, unhelpful and at odds with the aims in my Police and Crime Plan. They have the potential to restrict local police from meeting the needs of our communities. All forces have different priorities and this leads me back to the national vs local concern, which I have specifically raised with you in my response to previous HMIC reports (Crime Data Integrity response, dated 26 September 2014). Therefore, in consultation with the Chief Constable I will not take some of the recommendations forward as they do not fit with local priorities established within my Police and Crime Plan or are unachievable within current resources.

Locally, I am working on the introduction of mobile data. This major investment is being rolled out across the Force as we speak. It will significantly free up police time and increase visibility. As I previously outlined in my response to HMIC around ‘responding to austerity’, the restructure of the Force, which I recently endorsed, will eliminate the artificial boundaries created by the current geographical police divisions and centralise key operational areas of the business under a ‘one force’ model. The introduction of mobile technology will greatly improve the effectiveness and efficiency of the force. In real terms allowing an individual officer to spend approximately 2 hours more per shift within the communities they serve instead of having to return to police stations to complete paperwork. This has a further implication on the public and organisational requirement for physical infrastructure, namely police buildings. There are many changes that I and Humberside Police are examining, which are based both on the necessity of providing a modern policing service whilst concurrently matching the available resources. HMIC need

to understand the scale and pace of change and the associated physical and cultural changes that Humberside, and many other forces, are having to make in order to remain viable.

I find it frustrating and take exception to some of the language used in the HMIC report and particularly their own media statements. This undoubtedly creates a perception with the public that the police trivialise some types of crime and offer little or no support to the victims of those crimes. Whilst using an emotive phrase like 'postcode lottery' is something we all expect to read in the media, I would not expect it as the main title in a media release from HMIC. This sort of language is unprofessional and inappropriate for an official report from a public body. In addition, media reports quoted the HMI Inspector responsible for the report as saying "a number of crimes are on the verge of being decriminalised". Quite honestly I find this language shallow and potentially misleading. The national debate, which played out over several days following the release of the HMIC report, was not at all insightful or informed and has caused unnecessary damage to the police service. As we move forwards with significant reductions in budgets this is not the time to deliberately reduce public confidence for little gain.

From my reading of the report, some of the data is slightly misleading as HMIC have not given any credit for positive actions the Force is taking locally, or acknowledged that they have been unable to provide some information due to the labour intensive nature that drawing it out of their systems would entail. They have represented this as the Force not having the information at all, which is clearly incorrect. The tick-box approach adopted by HMIC and the language used that we were 'unable to provide details' is not acceptable. I have explored this with the Force, and we believe the over-simplistic tick-box approach was unhelpful. HMIC asked for data in a restricted manner and they recognised that not everyone would be able to provide information in the format requested. This does not mean that the information is unavailable or that the Force was being unhelpful to HMIC. The tick-box approach also provides little specific commentary or context, which would have helped inform local people about the policing service they actually receive.

I was puzzled by the reports and suggestion that every force in the country should adopt the same approach to crime. Each force area has its own challenges, different demographics and varying priorities. For example, policing in Humberside is not the same as policing in Greater Manchester. How can policing in a major city like Birmingham be the same as in the rural East Riding of Yorkshire? Sir Hugh Orde, President of ACPO, recently touched on the fact that it is difficult to adopt a consistent approach nationally when you have Police and Crime Plans driven by different Commissioners and local agendas. It is right to have similar operating standards across police forces, but in the 'new world' the strategic direction of each force is set by local Police and Crime Commissioners through our Police and Crime Plans, which take account of local issues and may conflict with HMIC's own national template. A force who implements local objectives directed from the Police and Crime Plan should not subsequently be publically penalised for not adopting HMIC's subjective template of best practice.

In the Humberside Police area, we have a diverse landscape with a busy city, several large towns and huge swathes of rural landscape and coastline. There is no 'one size fits all', and the police must and do react appropriately. My local force must be allowed to exercise its professional judgement to provide the right type of response to every call for service. Emergencies, protection of life and vulnerable people will always take priority. For victims of less serious crime who call the Force, many are happy to be dealt with over the phone, or make an appointment to come and see an officer. We cannot expect officers to attend 100% of crimes and we must ensure we do firstly what is best for each

individual victim. Most victims have realistic expectations and nothing is trivialised, nothing is being decriminalised and local police performance will be judged on HOW they deal with a crime not whether they sent an officer out in a car or how many people they managed to get to the scene.

I have been outspoken in my own views that policing has for too long been constricted and even corrupted by a target-driven culture. My recent letter to you around the HMIC Crime Data Integrity report makes this point clear. For years it's all been about numbers and that has stripped away the common sense, freedom and confidence of many of our officers to do the right thing. That culture is changing and local officers and staff are being empowered to make common sense decisions and focus on the right outcome for the victim. Like any organisation, like any human being, the police are not perfect, they will make mistakes; but where mistakes are made they will and do learn from them.

When the Government introduced Police and Crime Commissioners it was a significant positive step forwards in moving the governance of the police away from Whitehall and returning it to the public. This begs the question as to whether HMIC has adapted its own vision since the introduction of local accountability through Commissioners; on the surface it would not appear so. I am concerned that HMIC are increasing the number and breadth of inspections; improved service delivery is not provided by this model of a large and demanding inspectorate. Additionally, HMIC are straying into locally accountable decision making, which will hamper the work of the police at a local level and confuse local partners.

HMIC have a positive opportunity to provide an inspection and advisory capability that works in conjunction with forces to identify and suggest best practice. However, demanding forces adopt the HMIC perception of best practice is of course not always in the best interest of local residents. The current approach of HMIC is unacceptable at times and at worst is dangerous and confusing; which is especially concerning as we move towards the extremely negative, subjective and unhelpful PEEL grading. I am also disappointed that HMIC prepared individual Force 'Core Business' reports but chose not to publish them.

There are many good things HMIC could do to improve the performance of police forces across the country and I will continue to work positively with them and also challenge them where I feel their approach is inconsistent or assessments unfair. As I have stated previously, I fully believe that we need to have an open and honest debate as to the future of policing and how both Police and Crime Commissioners and HMIC fit into a potential new model. If the aspiration from the centre is to have national standards across policing then let's discuss that issue openly and constructively rather than through negative and destructive HMIC generated sound bites.

I hope that HMIC will continue their work on behalf of the public, but not be so overzealous that they put a considerable administrative burden on an already stretched workforce and undermine the public's confidence in a service they should be rightly proud of.

Yours sincerely

Matthew Grove
Police and Crime Commissioner for Humberside

cc Rt Hon Mike Penning MP
Justine Curran, Chief Constable, Humberside Police
Tom Winsor, HM Chief Inspector of Constabulary
Michael Cunningham, HM Inspector of Constabulary, Northern Region
Nick Alston, Chairman, APCC

Home Secretary Speech – Partnership Conference 18 November 2014

Thank you. It is a pleasure to be here at this police and crime commissioners' conference. I think it is particularly rewarding to look around the room today and see faces from across the country, from across the political spectrum, and representing so many different communities in towns, cities and the countryside. Two years ago we could not have said that the public had such a strong voice in the way they are policed in their area. Today we can look around this room and say that they do – and for that I think we can all be pleased.

When I became Home Secretary in 2010 I initiated a programme of radical police reform. I did so not just because the grave economic crisis we inherited made reform so necessary, but because I wanted to make policing better.

So we stripped back reams of unnecessary bureaucracy to free up police time and encourage productivity. HMIC was made properly independent of the government and of the police so it could act directly in the public interest. We introduced crime maps and beat meetings. We reformed police pay and conditions. We established the College of Policing to drive up standards and develop an evidence base for what works, and we established the National Crime Agency with the powers and mandate it needs to tackle serious and organised crime. The Independent Police Complaints Commission was beefed up so that in future it can take on all serious and sensitive cases. And we are getting to grips with those tough, stubborn, long-ignored issues such as stop and search and how the police deal with people with mental health problems.

I did this not as I say for the sake of change, but because it was so badly needed. And today we are reaping the benefits. Crime is down by more than a fifth under this Parliament, according to the independent Crime Survey for England and Wales. This is not just an abstract number – this year it means 962,000 fewer criminal damage incidents, 413,000 fewer violent crimes, and 160,000 fewer cases of people suffering the loss and trauma of a domestic burglary, compared to when this government came to power.

We have freed up to 4.5 million hours of police time – the equivalent of 2,100 full time police officers. The proportion of frontline officers has gone up – from 89% to 91% today.

And we have achieved all this while bearing down on budgets – central government funding for the police has fallen by 20% in real terms, saving £1.2 billion of taxpayers' money.

What's more, we are opening up the police to people from a diverse range of backgrounds, with different experiences and expertise through direct entry. And I am delighted that Police Now – the initiative recently launched by the Metropolitan Police to attract bright young graduates into policing – has had such an excellent response. It has received over 1200 applications, of which just under half are from women, and just over 18% are from people from a Black or Minority Ethnic background. This is in contrast to current police statistics which show that 28% of police officers are women, and only 5% come from a Black or Minority Ethnic background.

The importance of accountability

Our reforms have been comprehensive – and they are bringing tangible results.

I know we need to go further, and much more remains to be done.

But when you look at what we have achieved – perhaps among the most important things this Parliament has done has been to bring proper accountability to the police.

The value of that accountability was once again demonstrated this morning with the publication of HMIC's final report on the integrity of police recorded crime.

If you have not had a chance to look at it yet, I urge you to do so – it makes for disturbing reading. It reveals that up to a fifth of crimes reported to the police are not recorded. Victims of violent crimes and sexual offences suffer a greater injustice, with even higher levels of these crimes being under-recorded by the police.

And while the Inspectorate did not find wide scale evidence to suggest that these terrible results were due to local performance targets, I want to state again that there is no place for target chasing in the police. I abolished national targets so that the police could get on with what they do best – fighting crime.

It is never acceptable for the police to misrecord crime.

I made HMIC properly independent to shine a light on inefficiency and poor practice. That is what this report has done, and what HMIC will continue to do. Later this month the new PEEL programme will be introduced, bringing in annual inspections of all police forces in England and Wales. These annual inspections will allow the public to compare how their police force is performing in cutting crime and delivering value for money. They will radically change the way police forces are held to account and help drive improvements across the police.

And significantly – for all of you here today – the results of those inspections will form the basis for how the public decides to vote in the next police and crime commissioner elections in 2016.

But this is not the only area where we must continue to drive greater accountability.

I have said trust and confidence in the police must be improved. Not only by driving up standards, but by dealing with wrongdoing when it occurs. So today I want to announce further measures to help root out misconduct and corruption.

Currently police disciplinary hearings are held behind closed doors and there is no obligation for forces to make disciplinary decisions public.

I want that to change. So I am launching a consultation on measures to ensure that in future police disciplinary hearings will be held in public to ensure maximum transparency.

In addition, I will consult on proposals to make it easier for police officers and staff to report misconduct and malpractice by their fellow officers.

These proposals will include greater protections for whistleblowers to ensure that they are not subject to unfair disciplinary action, or other mistreatment by their force or colleagues.

These measures will build upon our existing reforms. They will help bring ever greater accountability and transparency into policing.

But perhaps the most visible manifestation of that accountability is sitting in front of me today. It is the men and women in this room who represent the differing and disparate policing needs of people up and down the country through their role as police and crime commissioners – an office I believe we should all welcome.

The role of police and crime commissioners

Just over a year ago I gave a speech presenting my assessment of the first full year of police and crime commissioners in this country.

I am not going to pretend that there have not been difficulties and challenges.

But as I said last year, I am clear that there is much for us to be pleased with in the introduction of police and crime commissioners. Not just because of the many positives they are bringing to policing – which they are, and which I will come on to shortly. But because if we pause for a moment to remember why we introduced directly elected, visible, accountable police and crime commissioners in the first place, we can see why change was so necessary.

The demise of police authorities

In theory, before 15 November 2012, every police force in England and Wales was held to account by committees of appointed councillors.

Except that they weren't really being held to account. In 2010, HMIC found that only four of the 22 police authorities inspected were judged to have performed well in two of their primary functions: setting strategic direction and ensuring value for money. That means that, in up to three quarters of forces, chief constables were not asked to justify decisions they had made and were not held responsible for their force's performance.

Then there was the lack of visibility. Recently Meredydd Hughes – the former chief constable for South Yorkshire Police – was called before the Home Affairs Select Committee. When asked to name any of the former police authority chairs from his time as chief constable, he couldn't remember the name of either chair despite the seven years of his tenure.

If chief constables found it easy to forget their police authorities, the public were oblivious. Only 7% of people even knew that police authorities existed. So how police authorities were supposed to convey the concerns of the local public, how they were supposed to provide a link between police leaders and the people, and how they were supposed to have legitimacy in making important decisions and holding their forces to account – is beyond me.

Police authorities were invisible committees of unknown appointees that had no contact with the public, whose members were installed and not elected, and who lacked the mandate to provide the leadership necessary to get things done.

So when I hear that the Labour Party want a “new political settlement” for policing which would replace police and crime commissioners with a “Policing Board” made up of local council leaders; or when I hear that the Liberal Democrats – who failed to even put up a candidate in South Yorkshire – propose a similar “board” of appointed councillors – I am reminded of those dark days of invisible, unaccountable committees.

We should call these policing boards for what they really are – police authorities by another name.

And when we look at the positives police and crime commissioners are bringing we can see just why returning to a committee model would be a grave mistake.

Visible, decisive and accountable leadership

Everyone in this room will be well aware that there have been some police and crime commissioners who have attracted notoriety. I am not going to start commenting on individual commissioner behaviour – ultimately it will be for the public to pass judgement at the ballot box. But I do want to say this:

There is a very good reason [Shaun Wright](#) is not sat here among us today. It is because he – as the publicly visible police and crime commissioner in South Yorkshire – was held to account by the people who elected him.

The failure by the police, Rotherham council and other agencies in Rotherham, to confront appalling child sexual exploitation, is inexcusable and exposes a complete dereliction of duty.

We should not forget that [Shaun Wright](#) had always escaped this level of accountability as a member of the police authority and as head of children’s services at Rotherham Council. As a police and crime commissioner, he was visibly and directly accountable, and I am glad that finally – after three weeks – he heeded the strength of feeling in South Yorkshire and resigned.

So when people try to use the indiscretions of individual commissioners to try to discredit the entire model, all they do is undermine their own argument. Because what they prove is that police and crime commissioners are delivering a level of transparency, visibility and accountability that did not exist before 2012.

I have said I believe there is an important debate to be had about recall. I understand you’ve had a lively debate about that here already. The passage of the Recall of MPs Bill through Parliament provides us with the opportunity to consider whether similar measures should be introduced for police and crime commissioners. That is why I have asked officials to examine ways to allow communities to recall police and crime commissioners should they fail in their duties.

South Yorkshire demonstrates how the office of police and crime commissioner can ensure public scrutiny and censure. But in Greater Manchester we see how strong leadership is made possible and rewarded. [Tony Lloyd](#)’s decision to commission the Coffey Report into child abuse showed firm and decisive action on this very difficult and sensitive issue.

That he can do this is in part because the commissioner model makes such leadership possible.

But you don’t just need to take my word for it.

The National Audit Office has shown how having a single commissioner could have important benefits ranging from faster decision-making to increased transparency.

The Home Affairs Select Committee has found that individual police and crime commissioners are providing greater clarity of leadership for policing in their areas, and are increasingly recognised by the public for the strategic direction they are providing.

And chief constables – many of whom originally expressed reservations about the concept of a single, elected individual – now acknowledge that there are advantages.

As Sir Peter Fahy, the chief constable for Greater Manchester, told MPs in April – and I quote – “on the whole having one person who holds you to account and you can work with very closely and is able to provide a lot more local flexibility has worked very well.”

So across the board there is recognition of the positives such leadership can provide.

Engagement with local communities

I have already said in the past that the turnout in the first police and crime commissioner elections in 2012 was disappointing. And while local by-elections rarely see higher numbers of voters than national elections, especially those in August and October, I would of course have liked to have seen more voters turn out in the West Midlands and South Yorkshire.

But under this government more than 5.8 million votes have been cast for police and crime commissioners in total. That's 5.8 million more votes than were ever received by any police authority.

We have every reason to believe that turnout at the next election in 2016 will be higher than before – the elections will be held in May, not November, and at the same time as local authority elections.

And the campaign will not be about “what are police and crime commissioners?” but about an incumbent defending their record, and challengers setting out a new way forward. In the world of policing and crime – where so much still has to change – that is a hugely refreshing thought.

But voter turnout figures are not the only measurements of success. Commissioners are engaging the public more than ever.

As [Vera Baird](#), the police and crime commissioner in Northumbria, has said: “My post bag and the hundreds of meetings I go to make clear, the public is now well aware of the presence of commissioners and very interested to hear about them and hold them to account.”

Collectively police and crime commissioners are getting upwards of 7,000 pieces of correspondence every month, and their websites are being visited by over 85,000 members of the public, every month.

They attend thousands of public events a year, and have used social media to engage directly with the public and demonstrate how they hold forces to account.

For example [Katy Bourne](#) – the police and crime commissioner for Sussex – webcasts her monthly Performance and Accountability meetings with the chief constable for Sussex Police.

Of course there is more that police and crime commissioners need to do to engage the public.

But let's be clear – all this is far removed from the days of invisible police authorities, and far removed from the alternatives proposed by the other parties.

Taking the lead and driving change locally

Most significantly, there are also those things that police and crime commissioners can do, that police authorities never did and could never have done.

And here I think we are really seeing how police and crime commissioners can make a difference.

Across many areas commissioners are leading important work nationally and locally, often using their positions to tackle cross-cutting issues.

In Staffordshire and Dorset, [Matthew Ellis](#) and [Martyn Underhill](#) are working to improve the police response to people with mental health issues through the introduction of street triage schemes. In North Yorkshire, [Julia Mulligan](#) has secured three health based places of safety where previously there were none. I know many other commissioners are pursuing vital work in this area.

In other areas police and crime commissioners are leading work to tackle violence against women and girls.

In Merseyside, [Jane Kennedy](#) has launched an Honour Based Violence and Forced Marriage Protocol to ensure consistency across all agencies in dealing with these terrible crimes.

In Northumbria, [Vera Baird](#)'s work has led to the creation of 165 Domestic and Sexual Violence Champions in workplaces, clubs and public spaces, among other important initiatives.

And many more of you are overhauling services, commissioning new services and ensuring vital access to rape crisis centres.

These examples are just a sample of the work being led by police and crime commissioners. There is much more besides. But the point is that this work could never have taken place under the old model of police authorities.

That is why last month we devolved funding for victims' services to local level, so that police and crime commissioners can tailor services to the needs of their local communities. I know all commissioners have been consulting extensively with communities on this, including on the creation of Community Remedy sanctions, and I applaud their approach in taking local opinions into account.

Collaboration

Many of you are also pursuing collaboration between forces and with other emergency services to deliver more effective services and better value for money for the taxpayer.

Essex and Kent have a well developed programme of collaboration for serious crime and IT. Cheshire, Northamptonshire and Nottinghamshire are part of a multi force shared service; and earlier this year Surrey and Sussex formalised a new collaboration agreement.

In Northamptonshire, [Adam Simmonds](#) is integrating police and fire services, and is looking to include the ambulance service in the longer term.

I am grateful to [David Lloyd](#), the commissioner in Hertfordshire, for leading the cross Emergency Services Collaboration Working Group – which has been jointly funded by all three emergency services departments - for taking this agenda forward. Through the Police Innovation Fund and the Department of Communities and Local Government's Fire Transformation Fund, the Government is providing over £70 million to support locally-led emergency services projects. And with the next round of the Police Innovation Fund now open, I can say we will welcome further collective bids of this kind.

Engagement on national policy issues

And nationally, police and crime commissioners are making their voice heard.

They commissioned the Parker Review of the Association of Chief Police Officers, which has resulted in real reform at a national level. The unaccountable ACPO is no more and the new National Police Chiefs' Council opened the nominations for its chair yesterday.

Commissioners also sit on the board of the College of Policing, and are holding Regional Organised Crime Units to account. And as I said at the recent police IT suppliers' summit, there is a real opportunity for police and crime commissioners to sort out inefficient and expensive police IT once and for all.

Police reform is working

So on visibility, accountability and leadership police and crime commissioners are making a difference.

Police reform is working. Crime is falling.

Police and Crime Commissioners are integral to that picture of change and I believe we can be proud of what we have achieved so far.

Where there were unelected, unaccountable police authorities, now there is a democratically elected police and crime commissioner.

Where there was invisibility, obscurity and anonymity, now there is a single, visible, accountable figure.

And where there was inefficiency, ineffectiveness and toothlessness, now there is a powerful mandate to drive change.

Our opponents said you couldn't cut police spending without crime going up. They were wrong. They said you couldn't cut spending without damaging the frontline. They were wrong. They said there was no need for police reform. And they were proved wrong again. And they say they want to replace police and crime commissioners with invisible, unelected committees. And in that they are absolutely wrong yet again.

Police and crime commissioners are providing accountable, visible leadership, and making a real difference to policing locally. And for that we should all be pleased. Thank you for all that you are doing.

Police Oracle Article - HMIC are ignoring the realities of policing



To call for all officers to presume that every reported crime is genuine ignores the impact that cuts have had on the service, writes Royston Martis.

Date - 20th November 2014

By - [Royston Martis - Police Oracle](#)

"The police should immediately institutionalise the presumption that the victim is to be believed."

Those were the words of Tom Winsor this week after his organisation, Her Majesty's Inspectorate of Constabulary (HMIC), found there is an "inexcusably poor" level of police recording of crime - with more than 800,000 crimes going unrecorded each year.

If you look at the numbers – and the resulting "inept police" headlines – then you would be forgiven for believing that thousands of officers have the mind-set that all victims of crime are lying.

What nonsense. That completely ignores the complexities of the job.

Cops have that terribly tough role of encountering many people when they are at their most vulnerable. They do their best to comfort victims of crime and families or loved ones of people injured or maybe even murdered – while at the same time trying to secure the best evidence to track down and lock up the bad guys.

That is what they do.

But let's be frank. Officers are also lied to on a daily basis by a large number of their customers. And some people claiming to be victims.

Can we blame our police officers for having an element of cynicism in their make-up? Do we not want them to ask robust questions on society's behalf whilst trying to establish the facts?

A lot of the time, policing comes down to a judgement call about who is telling the truth.

Officers are human and do not get everything right. Who does? And sadly there have been some recent high profile cases where genuine victims have not been believed. But cops are highly scrutinised and will be held to account for their decisions.

Since the publication of the HMIC report, where was the public dressing down for politicians who – as Parliament heard last year – have been responsible for “creating this atmosphere in which targets must be achieved”?

A lot of pressure to seek “genuine” crimes has come from above. Officers are sick and tired of being damned if they do and equally if they don't.

“Crime” everything and get in trouble from line managers right up the command chain, who are under pressure from local and national politicians.

But if officers apply discretion and use professional judgement, they get a public dressing down by HM Inspectorate of Constabulary.

HMIC clearly wants officers to see everything in black and white. It is a crime or it is not a crime. Sadly there are many shades of grey in policing. And this is where officers must use their professional skills and investigate.

But numbers come into it. There are now 16,000 fewer officers and – in total - 35,000 fewer people working in policing since 2010.

Those that are left are being rushed from job to job, dragged from pillar to post. Only a fool would think this does not affect the service they can provide the public. You cannot suffer such dramatic cuts and maintain a gold standard.

And sadly some all-important genuine victims will suffer.

Directed Questions – Police and Crime Commissioner (PCC) for Humberside Response

1. The Committee is interested in your views on how effective the police accountability structures are, what works well, what can be improved and what can provide the public with the necessary assurance that ethical standards are being maintained. The Committee welcomes any general comments but in particular invites responses to the following questions:

i. **Are there any gaps in the existing mechanisms for holding PCCs to account?**

Unequivocally yes; the Police and Crime Panel has allowed political squabbling to override its core statutory duties and failed the public.

PCCs can now choose how to hold the Chief Constable to account, which means there is no single national template. There are positive and negative elements to having a purely local approach, although national scrutiny then becomes difficult.

The events in South Yorkshire highlighted a significant gap in the ability of neither the public nor parliament to remove a PCC mid-term unless a very high legal threshold was reached.

A system of recall should be considered for all publically elected figures, ranging from councillors to MPs. However, this system must be robust and not allow the public to be failed by mischievous political agendas.

Ultimately Shaun Wright resigned after three weeks due to public pressure. Any official mechanism is likely to have taken significantly longer.

ii. **What can PCCs do themselves to improve their accountability to the public in between elections? How well are these mechanisms working in practice?**

Since taking office, the PCC has gained a public profile comparable to that of local MP's and community leaders, which has attracted a high level of engagement from the public, along with local and national media. The level of correspondence received by the OPCC has been very high. Annually, the PCC receives approximately 1500 emails and 600 letters. A good percentage of these are from members of the public asking for help in regards to their individual issues with Policing and Crime. Every piece of correspondence is investigated and answered. Often these have resulted in a personal visit or call from the PCC to the person concerned.

A system has been established with the force to handle enquiries of an operational nature. The PCC has no powers to interfere in operational policing, however, as the public's representative will direct operational correspondence through the Force Liaison officer. Necessary enquiries within the force are conducted and the results fed back to the PCC to enable him to monitor performance on behalf of the public.

A record of the PCC's public engagements can be found at Annex G and on his website at <http://www.humberside-pcc.gov.uk/Document-Library/Working-for-You/Transparency/How-we-make-decisions/Record-of-PCC-Public-Engagements.pdf>

More detailed information on how the PCC has made himself accountable to the public can be found at sub-question v.

iii. How are PCCs ensuring transparency in their decision making?

A corporate governance framework is in place and decision records are published on our website in a decision log <http://www.humberside-pcc.gov.uk/Working-for-you/Decision-Log/Decision-Log-2014.aspx>. Where suitable for publication these decision records are accompanied by a report outlining the background to the decision sought, risks, options and relevant financial, legal and equalities implications.

Minutes of any meetings where decisions may also be taken are also published via our website <http://www.humberside-pcc.gov.uk/Working-for-you/How-We-Make-Decisions/How-We-Make-Decisions.aspx>

iv. What information is being made available to the public to enable them to scrutinise the performance of their local police force and hold PCCs to account? To what extent is it easily accessible, understandable and reliable?

The issue here is not the availability of information but the confused and conflicting nature of that information depending upon its source.

Information provided from the ONS differs from that provided by HMIC reports, which differs from that provided by the HMIC web-site crime comparator and is different again from the information at Police.uk. For example, burglary includes dwelling and non-dwelling together on the Police.uk site and overall crime on the same site includes ASB. Total crime on the ONS stats is merely that (i.e. recorded crime and not ASB). So the public receive a 'confused' picture, which open to potential for poor recommendations and/or political "spin" both nationally and locally. Additionally, the question about national comparators needs to be addressed. One of the reasons for local elected PCCs is to represent the public and provide local priorities based on the requirements. Trying to then add a national framework and league table over differing local priorities will never produce a coherent or realistic product, which leads back to a confused public and loss of trust.

What information do the public use or trust?

- HMIC information (which is not timely)
- ONS statistics (which are not timely, are now 'dry' and devoid of any analysis since they only publish 'facts')
- PCCs (this varies due to local conditions – arguably the APCC could do more here – they have been 'promising' to create some guidance)
- 'others' such as the IPCC, partners, etc (who produce their own details which either 'fits' or doesn't with all the other published detail).

Additionally, we now don't get any pre-release data. Instead information is released to the public/media at the same time as the PCC and Force. Therefore, there is no opportunity to analyse and prepare any responses, which makes the public suspicious and again reduces confidence. This needs to change. HMIC and the ONS have created an air of 'mistrust', which is completely unhelpful to the public and officers/staff/partners equally.

A quarterly "Your Force performance blog" is published on our website which looks at how the Force is performing in regards to achieving the objectives set out in the Commissioner's Police and Crime Plan <http://www.humberside-pcc.gov.uk/Crime-and-Policing/Your-Force.aspx>

v. What has worked best for PCCs in engaging with the public and local communities?

Since his first week in office the PCC has held fortnightly Street Surgeries across the force area. These have enabled the public to meet the PCC in person to discuss their concerns, which are then followed through, as with correspondence. The Street Surgeries have also been the source of very positive feedback from the public on the level of service received from the Force.

During the drafting of his Police and Crime Plan, the PCC widely consulted the local population and partners both personally through public meetings across the force area and via his website. In 2013 the PCC conducted a 'Neighbourhood Tour' visiting every ward in the force area during his first year in office. This involved a full day meeting with Neighbourhood Policing Teams, ward, town and parish councillors and community groups to identify local issues and look at successful crime reduction initiatives. The PCC has also attended, by invitation, evening parish council meetings and various community events.

The PCC has been invited to local secondary schools, further education colleges and the University of Hull to address students. One event at Hull College attracted 200 students and the college have asked him to return on a regular basis.

In 2014 the PCC embarked on a joint bus tour of neighbourhoods across the force area, accompanied by ward councillors of all political parties, to meet residents and discuss local issues, especially in more remote areas.

The PCC website, www.humberside-pcc.gov.uk, has had over 50,000 'hits' from over 29,000 unique visitors since launch. It contains a vast amount of information about the PCC's work, latest news, photos, a monthly blog, and all the statutory information about his office.

Through the website, the PCC has held a series of monthly 'Web Chats' with the public, which have been extremely successful. He has also held three with local newspapers The Grimsby Telegraph and The Hull Daily Mail, where over 500 people logged on to the debate, and over 1000 more visited the newspapers' website to read the questions and answers in the 48 hours after the event.

The PCC is very active on social media. His Twitter account [@humbersidepcc](https://twitter.com/humbersidepcc) has over 3,000 followers and he Tweets most days on his activity. In 2013 he spent two late shifts working with 999 Incident Response teams in Hull and Grimsby and Tweeted live throughout on his observations. Both events attracted a huge following, not just locally, but across the country with extremely positive feedback from both the public and serving officers that the PCC was seeing life at the 'sharp end.' Hundreds of Twitter users followed the night's events, as he tweeted live updates from the incidents they attended. The PCC also has a popular Facebook page.

Each month the PCC meets the victims of serious crime. These Victims Surgeries are coordinated by Victim Support at their offices. He hears first hand the stories of victims and how they have been supported since the event.

The PCC maintains a healthy relationship with local and national media outlets (TV, Radio and Press), and has made himself available to all requests for comment and appearance on a variety of subjects relating to his role, so the public can judge his performance.

He is a regular guest on BBC Radio Humberside phone-in shows, and the regional BBC news programme 'Look North'. Additionally, the PCC contributes a monthly column to five local newspapers across the force area updating residents on his work and ambitions to reduce crime and improve safety.

vi. How well are Police and Crime Panels able to hold a PCC to account between elections?

The Humberside Police and Crime Panel has members from the four authorities that make up the Force area along with two independent members. The four local authority areas are Hull, the East Riding of Yorkshire, North Lincolnshire and North East Lincolnshire.

The Panel has found it very difficult to act as a united body and been somewhat dysfunctional preferring to engage in internal political point scoring, protracted debates and arguments about the proportionality of members making up the Panel, much of which is synonymous with the historic political toxicity that continues to be played out across the area. This tension has not been solely on party political grounds but more often geopolitical, highlighted by disagreements and the as yet, unresolved issue of the actual composition of the Panel and how many members there should be from each authority. This has led to decisions made out of political expediency rather than based on the evidence presented.

The East Riding of Yorkshire Council (ERYC) has in particular been reluctant to fully engage with the Panel by refusing to send its full complement of members. Further evidence of ERYC's reluctance to engage with the Panel is the unfortunate decision taken by the Council to unilaterally establish their own scrutiny panel to conduct a "behind closed doors" review of the *Building the Future* policing model. This was without consultation with the Panel, the PCC or the Force. It should be noted that this new policing model moves away from the present divisional structure co-terminus with local authority geographic borders, to a single force model working across these boundaries. *Building the Future* is to be delivered from April 2015 and is designed to release resources in order to provide a better and more accessible/visible policing service and also achieve enforced savings to the Force of some £21m in the period leading up to 2019. It was only after ERYC had decided to establish this Scrutiny Panel that the PCC and the Chief Constable were invited to appear.

This invitation was declined for the following reasons:

- It was strongly felt that the Police and Crime Panel, with representation from all four local authorities, was the correct place for this scrutiny function as per the Police Reform and Social responsibility Act 2011. To appear would have undermined the validity of the Panel
- The review would not have been open and transparent as it was to be carried out "in camera" by selected Councillors, none of whom are appointed to the Police and Crime Panel. Although this has not been pursued there is a possibility that closed door meetings of this type could also be illegal under the Local Audit and Accountability Act 2014.
- The timing of the proposed review was very premature as much of the work on the Force redesign was incomplete, therefore there was very little to scrutinise at that time. Now that more of the planning has been completed both the Chief Constable and the PCC recently

attended a Police and Crime Panel, where the plans were laid out for scrutiny and the ability of the members to seek clarification/reassurance.

Instead of attending the private scrutiny panel an offer was made by the PCC and the Chief Constable to appear before the full East Riding Council in an open forum to take questions on *Building the Future*, however, this was declined. In lieu of the opportunity to discuss the proposals in open council the PCC agreed for the Divisional Commander to attend and provide the professional input.

The ERYC subsequently published a report, which contained serious factual inaccuracies, references to press stories rather than fact and selective content extending far beyond the original terms of reference. The report was officially released by the Council to the press before it had been approved by the Council's scrutiny committee, the Council's Cabinet or the Councillors at a full Council meeting. Unfortunately, the Force and the PCC only had sight of the report as it hit the press. Ironically this report has never been brought to the Police and Crime Panel by the ERYC members. Further detail and a copy of the report is attached at Annex K with the Force rebuttal at Annex M. Subsequently ERYC referred the Chief Constable and PCC to this Committee. Ironically the Chief Constable was copied into the referral but not the PCC. A copy of the ERYC referral letter is at Annex L.

As highlighted above, the *Building the Future* model was taken to the Police and Crime Panel on 21 November 2014 where it received the overwhelming support of the members and no significant concerns were raised by any member of the Panel.

With a change in the Police and Crime Panel membership, a new Chair and Vice Chair elected and the proportionality issues put to one side, the Panel is now looking to fulfil its role and there is much optimism that the body will function better and be able to more fully hold the PCC to account in the future.

In addition to attending meetings of the Police and Crime Panel the PCC and/or Deputy Commissioner (DPCC) have/has appeared before the relevant scrutiny committees of all four local authorities as requested. These meetings are held in public and it is felt that they have proved useful to all parties. The PCC and DPCC have also attended numerous town and parish council meetings and other groups such as the Chamber of Commerce. These meetings have always been open and the scrutiny has been of the PCC rather than the Force. These meetings are continuing.

It is disappointing that the leadership of ERYC continues in struggling to accept and recognise the role of the PCC. The Council clearly wished to circumvent the Police and Crime Panel and this is further evidenced by the continuing briefing against the PCC and Humberside Police.

The relationship between the PCC and Humberside Police and the other three local authorities of Hull, North Lincs and North East Lincs along with other strategic partners is open, positive and productive. There is a strong feeling of working together for the interests of the public.

Some brief additional comments to the specific sub-questions are as follows:

a. Does the role of the Police and Crime Panel need any further clarification?

Yes.

b. How well are the current “balanced” membership arrangements ensuring effective scrutiny and support of PCCs?

The answer to this question will vary between local Force areas. Some will have effective, positive and challenging Police and Crime Panels able to provide effective accountability and transparency, whilst others such as Humberside will not.

This could be for a variety of reasons including political affiliations or personal grievances. The role of the Police and Crime Panel could be incredibly positive to the public if approached in a professional manner. Full and challenging accountability is welcomed, however, in order for this to be achieved the panel needs to have more clearly defined roles, powers and composition rules.

c. Are the current membership thresholds requiring a two thirds majority to veto a PCC’s level of precept and appointment of a Chief Constable proving practicable?

In theory, yes. However, this is dependent on positive engagement of the panel, which acts in the public interest rather than political point scoring.

d. Should Police and Crime Panels have the power to veto PCC appointments of senior staff where they believe the criteria for suitability were inappropriate or not satisfied?

No. The PCC is a corporation sole and must maintain the ability to “hire and fire” staff.

e. How should PCCs be held to account for their standards of personal conduct? What role should Police and Crime Panels have in this?

Complaints about the PCC are directed to the Police and Crime Panel. Additionally, the Monitoring Officer has a significant role. Whilst not a formal mechanism, the role of the media in providing the public with this information is also key. Ultimately the public elect the PCC and the panel, as their representatives, should heed their opinions.

vii. Are the boundaries between the local roles and responsibilities of the PCC and Chief Constable being adequately communicated and understood by local communities? Is there evidence that they require any further clarification or guidance?

This was not widely understood at the time of the PCC elections with many of the electorate feeling the PCC was very much a policing role. This was certainly a contributory factor in one of the Independent candidates, a retired senior police officer, receiving such a large percentage of the vote. Owing to the fact that the Chief Constable announced his upcoming retirement prior to the election, one of the first tasks of the PCC was to recruit and appoint a new Chief Constable. This process certainly helped the public understand the differences between the two roles. Two years on, the boundaries are becoming increasingly understood by the public although it is a slow process, but with the local media certainly understanding the difference and with the PCC having an increasingly prominent profile, the differences between the role of the PCC and the Chief Constable are becoming clearer in the eyes of the public.

It is felt that further clarification and guidance nationally would be helpful and the PCC has done a great deal locally by constantly delivering explanations.

viii. According to the Financial Management Code, Audit Committees should ‘advise the PCC and the Chief Constable according to good governance principles and to adopt appropriate risk management arrangements.’ How well is this working in practice? Are there any examples of conflicts of interests arising from PCCs and Chief Constables having in some cases, a joint audit committee and/or a joint chief financial officer?

We have what is regarded by our external auditors and internal auditors as a very good Joint Independent Audit Committee (JIAC). The JIAC have a private meeting with both internal and external auditors prior to each meeting without officers present. The Committee has already reviewed and revised its terms of reference. Proposed amendments were subsequently agreed by the Chief Constable and PCC. They have developed their own work plan and expressed a keen interest in risk management issues. The JIAC continually review where and how they can add value. Things being looked at are more regular meetings, determining ways to assess the performance of the Committee, lead member arrangements and establishing closer links with neighbouring JIAC Chairs in connection with collaborative working. In addition the JIAC will be updating its terms of reference again in line with the most recent CIPFA guidance on audit committees, which places greater emphasis on governance, internal control and ongoing involvement in overseeing the assurance processes in place. There is increasing interaction with other Committees via events arranged by the Police Audit Group for Chairs and committee members. The Committee have had training on a range of issues such as insurance/risk and treasury management. The JIAC comprises 5 independent members in line with the Financial Management Code of Practice recommendation. They are very experienced in business, commerce, health and policing, with two members having had experience as “independent persons” in connection with complaints against councillors in two different local authorities within the Force area. Members have been consulted for their views on suggestions of establishing a separate ethics committee.

We have separate CFOs and the JIAC to date has not had any issue where there has been a conflict of interest.

2. The Committee are concerned to understand generally the steps all parties to the Policing Protocol are taking to ensure they are abiding by the Seven Principles of Public Life. The Committee also wishes to consider specifically the extent to which PCCs are providing ethical leadership in embedding the Policing Code of Ethics, and are themselves acting within that framework as elected officials. The Committee invites views generally and on the following questions:

ix. What do you see are the key responsibilities of PCCs as ethical leaders? Can you provide examples of PCCs managing those responsibilities well, or, if not, suggest what can be improved?

The key responsibility of PCCs as ethical leaders is that through their actions they set the tone and the benchmark for others in the organisation to aspire to; a role model. The tone was clear in the Police and Crime Plan and this continues to be promoted by the PCC and DPCC who have conducted themselves in an honest apolitical way, showing empathy and consideration for police officers and Staff, partners and particularly the victims of crime. The positive, honest and open relationship with the Police Federation and UNISON has made the change process somewhat easier.

The PCC's monthly victims' surgeries have shown him to be a caring individual and a true victim's champion. Fortnightly street surgeries, regular TV and radio appearances and a monthly column in many local newspapers have shown a degree of openness not often seen in many public sector leaders. The feedback from senior local journalists and editors reflect credibility in Matthew Grove as an individual as well as the office of PCC that he holds and that he treats everyone fairly, equally and with respect. Positive comments from councillors and members of other political parties who describe Matthew as "their Commissioner" demonstrate his ability to work across the political divide with ease. The positive engagement and relationships with public and voluntary sector partners also point to support for the PCC's ethical leadership. It is this honesty and openness that leads to positive relationships with almost all partners, with the exception of ERYC.

x. What actions are PCCs taking to ensure that they and the police force they hold to account maintain the highest ethical standards and embed the Policing Code of Ethics? In particular how are PCCs and Chief Constables as leaders promoting and sustaining the core values of policing in the face of all the other pressures on the force? How are any obstacles being overcome?

The PCC agreed to the implementation of the Code of Ethics across the Force and also within his own office. Since the launch of the Integrity Programme and the Code of Ethics by the College of Policing this year, Humberside Police have taken a pro active approach in this area. Humberside Police used the recommended ACPO Integrity Model as developed for the Police Service by Transparency International UK to complete the HP Integrity Programme Action Plan 2014. Humberside Police also embedded the newly published Code of Ethics using the recommended assessment guide as issued by the College of Policing.

Under the Integrity Working Group this Action Plan commenced in July 2014. The PCC monitors and scrutinises the implementation of the Action Plan through the established governance framework. Below are some of the key actions:

- Extensive marketing and awareness campaign led from the top at the Chief Constables away days followed up by all staff receiving a copy of the code and a blended training approach using our cultural change champions and workplace coaches.
- Newly developed Leadership courses to include the Code Of Ethics and wider integrity themes to enable our supervisors and managers to lead and push forward the programme throughout the organization
- A new training package is in development which will include the National Decision Making model incorporating the Code Of Ethics and the new THRIVE principles to assist with the everyday application of the NMD and consideration to the COE by all staff.
- Every course produced will include the Code of Ethics
- The Code Of Ethics to be an instrumental part of the new PDR process enabling all staff to discuss the Code with their supervisors and its application
- A review of the grievance procedure to ensure fair treatment is embedded throughout the organization.
- Instructions to all staff re the importance of Ethical Crime recording in line with the Code of Ethics
- Humberside Police have signed up to the Public Concern at Work (PCaW) re whistle blowing and will be the only police force in the country to do this at this moment
- A newly created policy working group reviewing all policies in line of new operating model with the Code Of Ethics and the NDM now an integral part of the policy framework.
- The Code Of Ethics will be built into all recruitment/selection/promotion process and embedded into job descriptions and contracts.
- The Code of Ethics will be built into the new HR Toolkit and Sharepoint System.

Humberside Police Integrity Programme

On completion of the Commit, Assess and Plan stage of the ACPO Police Integrity Model, the below were the key concerns/considerations that needed acting upon. This assessment was done alongside and with consideration to the HMIC and College of Policing recommendations, as well as best practices from across the country.

- Review of the Gifts, Gratuities and Hospitality Policy and Procedure
- Review of the Business Interest Policy and Procedure
- Review of the Inappropriate Associations Policy
- Review of the publishing of the Chief Officers GGH, business expenses and contact with the media
- Review of the publishing of Police Misconduct Outcomes
- Setting up of an External Ethics Committee
- A staff awareness/education programme on key Integrity themes commencing next month for the following 18 months. The below are the first 3 key areas been addressed:
 1. Sexual Misconduct
 2. Use of Force
 3. Misuse of Force Systems
- Humberside Police have adopted the Home Office 'Best Use of Stop and Search Scheme' to achieve greater transparency
- The Commissioner has been briefed on the implementation of the Code of Ethics in the Force via the Corporate Governance Group
- He has adopted the Ethical Framework for PCCs, which was developed by the APCC Integrity Working Group, and a copy of this which includes examples of the ways in which he fulfils the Nolan Principles is available on his website at <http://www.humberside-pcc.gov.uk/Working-for-you/Who-We-are-and-What-We-Do/Ethical-Framework.aspx>
- Consideration is also being given to utilising the current Joint Independent Audit Committee as a Audit and Ethics Committee
- PSC standards of behaviour apply to police staff and staff within the OPCC

xi. Is there sufficient transparency of propriety information from PCCs, for example published information on expenses, registers of interest, gifts and hospitality and external meetings?

The Elected Local Policing Bodies (Specified Information) Order 2011 and the 2012 amendment set out information that we are required to publish. We provide an index listing each category of information within the Order and a link to the relevant page on our website, this enables our website users to quickly and easily go to information that they are seeking <http://www.humberside-pcc.gov.uk/Working-for-you/Transparency-Index.aspx> .

Our compliance with this Order has been audited and we have been found to be compliant with the exception of the publication of contracts over £10k, which has been flagged up as a national issue due to problems with commercial sensitivities and redactions. Should we ever be asked for a particular contract the necessary redactions would be considered and information provided as appropriate. The Internal Audit report is attached at Annex K.

In a survey conducted by CoPaCC, an organisation set up to scrutinise the performance of PCC's, all 41 PCC offices in England and Wales, plus the London Mayor's Office for Police and Crime were audited to check how much information they made available to the public on their websites. Twenty five different disclosures were checked including financial information, decision making and freedom of information. Humberside was ranked second overall.

We are also required to publish information in accordance with the Freedom of Information Act 2000 and we provide a disclosure log on our website which provides details of information provided as a result of Freedom of Information requests received.

xii. What measures have proved helpful in supporting PCCs to identify and resolve conflicts of interest in discharging their duties? Are there sufficiently robust protocols and guidance in place locally to manage these in a transparent way?

The issues around openness and transparency, for which the PCC was highly commended by CoPaCC, are constantly at the heart of what the PCC does. Honesty, integrity and adherence to the 'Nolan Principles' are key to the activities of the Office of PCC with the Commissioner always mindful of perceptions of conflicts of interest in the eyes of the public meaning that protocols and procedures are not only in place but are robust and open to public scrutiny through the website. The PCC and DPCC have 'Registers of Interest published' on the Commissioner's website that are available for all to view at <http://www.humberside-pcc.gov.uk/Document-Library/Working-for-You/Transparency/Lists-and-Registers/Register-of-Interests.pdf>



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Date: 17 October 2014

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Dear Sirs

Response of East Riding of Yorkshire Council to Humberside Police Force Redesign Plan

I write in response to the Committee on Standards in Public Life call for submissions about the accountability to the public of Chief Constables under the elected Police and Crime Commissioner (PCC) system introduced in November 2012.

At Full Council on 8 October, Members agreed to send the Committee its overview and scrutiny panel report on the planned changes to the level of policing in the East Riding of Yorkshire due to be implemented within 6 months on 1 April 2015.

The main finding from the Council's scrutiny panel is that the Police & Crime Commissioner and the Chief Constable should have done more to engage and consult with statutory partners and the wider public on their radical plans for change within the Humberside Police Force.

It is the Council's view that it holds the Chief Constable and the Police and Crime Commissioner to account locally under its scrutiny powers provided in the Local Government Act 2000 and the Police and Justice Act 2006. The Police and Justice Act 2006 Part 3, 19(1) states that "every local authority shall ensure that it has a committee with power (a) to review or scrutinise decisions made, or other action taken, in connection with the discharge by the responsible authorities of their crime and disorder functions."

The Crime and Disorder Act 1998 Part 1 Chapter 1 Crime and Disorder Strategies defines 'responsible authorities' as:

- (a) The Council for the area, and
- (b) Every chief officer of police any part of whose police area lies within the area.



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17 October 2014

In addition under the Local Government Act 2000 Chapter 2. Section 9F 2(e) overview and scrutiny committees have power to “make reports or recommendations to the authority or executive on matters which affect the authority’s area or the inhabitants of that area.”

However, the Chief Constable and the Police and Crime Commissioner declined to attend the Council’s scrutiny review panel and share the full details of Humberside Police’s plan for the redesign of policing developed in response to the financial constraints it faces in future years

The view taken by the office of the Police and Crime Commissioner was that the Chief Constable was held to account by the PCC and the PCC was held to account by the Police and Crime Panel.

The Council was, therefore, prevented from fully carrying out its responsibilities on behalf of the public of the East Riding of Yorkshire. Further, Humberside Police’s partners in tackling crime and disorder have also not had sufficient opportunity to fully share their views on the content of Humberside Police’s redesign plan and how it may impact demand on their services and the cost shunting this may bring.

The Police & Crime Commissioner and the Chief Constable offered instead to attend a meeting of the Full Council with all 67 Members present but it was felt that this would not provide the same opportunity for effective scrutiny in the way review panels are set up to do in a smaller cross party group and non-political setting. In addition, the Council’s scrutiny review panel met over several sessions and called for information from a wide range of partners and interested groups and was able to weigh-up the information available to reach its findings and conclusions.

It is clear that the legislation that introduced Police and Crime Commissioners and Police and Crime Panels has muddied the waters as regards scrutiny and the holding to account of both the Chief Constable and the Police and Crime Commissioner. The view taken by the office of the Police and Crime Commissioner at this level effectively excludes any local authority from scrutinising the decisions of either a Chief Constable or, more pertinently to your deliberations, a Police and Crime Commissioner. The Council’s scrutiny panel felt that this limited their ability to scrutinise the changes being planned to policing in Humberside and it is felt that the local authorities’ scrutiny powers to hold the Police & Crime Commissioner and the Chief Constable to account therefore requires clarification.

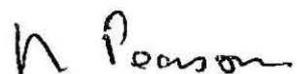
The Council considers that the Police & Crime Commissioner and the Chief Constable could have made much more effort to engage and consult with the Council and the public in the East Riding during the development phase of their plan in the interests of openness and accountability. The Council hopes that the Committee on Standards in Public Life finds the attached report of interest and helpful in its deliberations.

- 3 -

17 October 2014

Please let me know if you require any further information.

Yours faithfully

A handwritten signature in black ink that reads "N Pearson". The signature is written in a cursive style with a large, stylized 'N'.

Nigel Pearson
Chief Executive

Copy to
Chief Constable, Humberside Police