

Proposed policing inspection programme and framework 2020/21

For consultation

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Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services independently assesses and reports on the effectiveness and efficiency of police forces in the public interest.

We ask the questions that we believe the public wish to have answered, and publish our findings, conclusions and recommendations in an accessible form, using our expertise to interpret the evidence. We provide authoritative information to allow the public to compare the performance of their police force against others, and to determine whether performance has improved or deteriorated over time. Our recommendations are designed to bring about improvements in the service provided to the public.

Foreword

Our PEEL inspection programme remains a major part of our activity. This year, we are consulting on our new approach to the programme. It will mean that we make better use of all the evidence we collect throughout the year and reduce our reliance on intense periods of fieldwork. We will also become more dynamic. Our reports will be published as soon as they are ready, and a cause of concern can be made public as soon as possible if public safety is at risk.

We have previously identified a need to take account of the broader context that can affect forces. Our PEEL activity will consider the effects of funding and demand upon force performance. There is also a substantial and increasing amount of crime that transcends local, regional and national borders. As a result, forces need to work not only together but also with other public bodies to tackle these crimes and keep people safe. We will consider these collaboration arrangements when planning inspections and making judgments.

Supporting victims and protecting vulnerable people are central to everything the police do. This year, PEEL will include a new victim service assessment (VSA), which will assess the standards of service that police forces give victims of crime – from point of contact to outcome. We also plan to carry out inspection work on important issues such as child protection; the police and Crown Prosecution Service's response to rape; the multi-agency response to suspects and offenders who have mental ill health; and the criminal justice response to serious youth violence.

Thank you for your interest in our proposed inspection plans for 2020/21. Your response to this consultation document will help make sure that we continue to focus our inspection work on what matters most to the public.

Consultation questions

This document provides details of our proposed programme of policing inspections for 2020/21. It asks for your views on whether we cover the right themes and areas of policing. In particular, we are seeking your responses to the following consultation questions:

1. Do the proposed thematic inspections – of child protection; investigating and prosecuting rape cases; the multi-agency response to suspects and offenders who have mental ill health; serious youth violence; and how well policing responds to two threat areas within the *Strategic Policing Requirement*, namely serious and organised crime (SOC), specifically through the activity of regional organised crime units, and public order – cover areas that are of most concern to you at the moment?
2. Are there any significant new or emerging problems in policing that HMICFRS should take into account in our inspection activity?
3. How else could HMICFRS adapt the way in which we acquire information, to take account of current circumstances and risks to public safety?

These questions are repeated in the body of this document. At the end of the document, we explain how you can let us have your views.

This year, we are also consulting on changes to the PEEL inspection programme. The details of our new approach can be found in Annexes A and B. We welcome your views on these further questions:

4. What do you think of the proposed approach to assessing police forces in PEEL 2020/21 (Annex A)? How could this be improved?
5. Does the draft inspection methodology (Annex B) include the right inspection areas to gather evidence for a rounded assessment of police forces? How could this be improved?
6. Do you agree with the proposal to make judgments based on the characteristics of 'Good', causes of concern and areas for improvement?
7. Do you agree with the proposal to provide judgments at the core question level only?
8. Which of our proposals, four or five tiers of judgments, do you think will most promote improvements in policing?
9. Do you have any comments on our proposed approach to inspecting partnership and collaboration arrangements?

Introduction

This document provides details of HMICFRS's proposed inspection programme and framework for policing for 2020/21.

Types of inspection in 2020/21

PEEL assessments

PEEL is the inspection programme in which we draw together evidence of the effectiveness, efficiency and legitimacy of the police. Its principal aim is to promote improvements in policing. It provides direction for forces on the areas they need to improve, while providing a 'health check' assessment for the public.

National thematic inspections

Our thematic inspections are in-depth examinations of particular policing practices or processes, or of the policing response to specific offences. Themes are identified through monitoring or horizon scanning. They are generally chosen because:

- there are current acute problems in policing practice, which are harming or are likely to harm the public interest;
- there are inconsistencies in outcomes across England and Wales, which force-level work cannot adequately explain; or
- further improvement in practice would benefit the most (or the most vulnerable) victims.

Expanding on the force-specific information from PEEL inspections and force management statements, inspectors build a national picture of police effectiveness in the selected area through a combination of:

- all-force data and responses to document requests;
- interviews with national, regional and local policing, government and other interested parties;
- case file audits and reality testing in forces; and
- a victim, offender or witness focus.

Thematic inspections tend to identify areas of strong or weak practice in specific forces but result in recommendations that are relevant to the police service as a whole.

Commissions from the Home Secretary and local policing bodies

The Home Secretary may, at any time, require us to carry out an inspection of a police force, part of a police force, or particular activities of one or more police forces.

Similarly, local policing bodies may, at any time, ask us to carry out inspections or reviews of the police forces they oversee.

Inspection of national agencies and other non-Home Office forces

We have a statutory responsibility to carry out inspections of the following national agencies and non-Home Office forces:

- the National Crime Agency
- the Police Service of Northern Ireland
- the British Transport Police
- the police forces of the armed services
- the Ministry of Defence Police
- the Civil Nuclear Constabulary
- HM Revenue & Customs.

Also, at the request of the relevant dependency or overseas territory, inspections may take place of forces in British Overseas Territories and Crown Dependencies, such as Jersey, Guernsey and Gibraltar. Similar voluntary inspection arrangements are in place with the Gangmasters and Labour Abuse Authority.

Joint inspections

We work with other organisations to conduct joint inspections. Such inspections allow us to inspect the police response to a particular type of crime or problem as part of a wider assessment of the service provided by all the relevant agencies and organisations.

For instance, as part of our joint targeted area inspections, we work with Ofsted, the Care Quality Commission and HM Inspectorate of Probation to examine how local authorities, police, probation and health services work together to help and protect children.

We work most frequently with the other criminal justice inspectorates: HM Crown Prosecution Service Inspectorate, HM Inspectorate of Probation and HM Inspectorate of Prisons. This allows us to assess police effectiveness in both contributing to and being affected by the wider criminal justice system. Joint inspection work we conduct with these inspectorates is detailed in the separate [Criminal Justice Joint Inspection Plan for 2019–21](#), which was published in August 2019.

State of Policing report

As in previous years, the chief inspector of constabulary will produce his annual *State of Policing* report, which reports on the efficiency and effectiveness of policing in England and Wales.

An overview of HMICFRS's inspection programme for policing 2020/21

PEEL 2020 programme

HMICFRS will continue to publish a formal assessment and a report for each force during a PEEL cycle. This will be based on everything known about that force up to the point that we make our judgments. Our intelligence-led continuous assessment approach makes greater use of evidence collected throughout the year, including in identifying the need for further fieldwork.

By the end of 2020/21, the new continuous assessment model will have been introduced across all 43 forces. In addition, 24 of the 43 forces will have had fieldwork completed and 15 reports will have been published.

We will continue to acquire information using methods that include:

- analysis of documents and data;
- reviews of case files;
- surveys of the public and others;
- interviews;
- focus groups;
- observations of police practice; and
- force management statements.

National thematic inspections and rolling programmes

Some elements of planned thematic inspections for 2020/21 may be integrated into the PEEL all-force inspection programme. Some may also be included in the Criminal Justice Joint Inspection Plan. It is important to note that thematic inspections are still an essential part of our programme of work and will continue to take place alongside the PEEL inspections.

Our proposed thematic inspections include child protection; investigating and prosecuting rape cases; the multi-agency response to suspects and offenders who have mental ill health; serious youth violence; and how well policing responds to two threat areas within the *Strategic Policing Requirement*, namely SOC, specifically through the activity of regional organised crime units, and public order.

Consultation question:

1. Do these proposed thematic inspections cover areas that are of most concern to you at the moment?

In 2020/21, all our thematic inspections of the police response to vulnerable people will be conducted jointly. This reflects the importance of close working with other agencies in providing the best possible support and service to these people. This close working may be as part of the criminal justice system or within multi-agency safeguarding arrangements.

Scoping work for these joint thematic inspections has begun and was agreed in the [Criminal Justice Joint Inspection Plan for 2019–21](#).

We also propose to continue our rolling programmes on child protection and youth offending teams.

Vulnerability and child protection inspections

Protecting vulnerable people is a fundamental part of policing. We assess the police response to threats to and crimes against vulnerable people in several of our inspection programmes, including thematic inspections and through specific questions in the PEEL inspections. We have committed to review and report on forces' response to domestic abuse. We inspect as part of our PEEL programme, and we also report on a quarterly basis to the Home Secretary's National Oversight Group on Domestic Abuse.

We also have three rolling child protection programmes as follows.

National child protection inspections (England and Wales)

Our national child protection inspections examine the effectiveness of the police at each stage of their interactions with or for children, from initial contact and early identification of children who are at risk through to investigation of offences against them. These offences include child sexual abuse and exploitation, online offending and neglect. We also examine cases of children present at the scene of domestic abuse, and those who are in custody. The flexible methodology and specialist inspection team allow us to include assessments of areas of child protection practice that are of particular interest or concern to a force, national policing, government and the public. For instance, we have in recent years increased our inspection of criminal exploitation cases, and of the police response to indecent images of children.

We don't make graded judgments, but our reports give forces a detailed blueprint for recommended effective practice. We describe the strengths they should build on and where they can improve. A full follow-up programme allows us to track progress, while support and engagement from our team before, during and after each inspection make sure that forces understand our approach.

In 2020/21, we will conduct six inspections, six re-inspections and further follow-up work. We will publish a separate thematic report collating and expanding on our findings on police early intervention and prevention activity (in support of the joint work on this, set out in the next section), and will run a programme of tailored improvement and learning events for forces.

Joint targeted area inspections (England)

We work with Ofsted, the Care Quality Commission and HM Inspectorate of Probation to examine how English local authorities, police, probation and health services work together to help and protect children.

As well as examining the effectiveness of these child protection partnerships from the perspective of the children referred to them, each cohort of six inspections has a 'deep dive' theme. In 2020/21, these themes are planned to be early intervention and prevention, and the experience of older (16 and 17-year-old) children. These will be explored through the ten joint targeted area inspections planned over the year.

We will communicate these thematic findings – for example, through national and regional events, reports and close work with other inspectorates – to ensure that all forces can consider common themes and take action as needed.

Joint inspection of child protection arrangements (Wales)

We work with the Care Inspectorate Wales, Healthcare Inspectorate Wales, Estyn and HM Inspectorate of Probation to examine how Welsh local authorities, police, probation and health services work together to help and protect children.

This new inspection programme shares with the (England-only) joint targeted area inspections a focus on the experiences of children as a way of assessing the effectiveness of partnership working. However, the methodology and approach are tailored to the context and different partnership arrangements and responsibilities in Wales.

A pilot inspection was carried out in December 2019. In 2020/21, we will conduct up to six joint inspections of child protection arrangements in Wales and develop and embed learning from this programme.

Inspection of national agencies and other non-Home Office forces

Subject to further discussion with the organisations concerned, in 2020/21, we intend to carry out inspections of the following:

- HM Revenue & Customs
- the Royal Military Police
- the National Crime Agency
- the British Transport Police
- the Royal Navy Police
- the Gangmasters and Labour Abuse Authority
- the Police Service of Northern Ireland

- the Civil Nuclear Constabulary.

The inspection of national organisations and non-Home Office forces is undertaken on a statutory basis. The purpose of these inspections is to promote improvements that help protect the public.

When it is possible to do so, the inspection activity is designed to support judgments on the ability of the organisations involved, and law enforcement as a whole service, to respond to issues affecting the public. Examples of this are the contributions from inspections made to the State of Policing report and ‘spotlight’ reports, such as the planned one on SOC.

In this year’s inspection programme, greater emphasis will be given to drawing conclusions about how organisations, such as the National Crime Agency, HM Revenue & Customs and others, are responding to the 2018 SOC strategy and tackling this activity. The interactions between organisations dealing with thematic issues are considered through such inspections.

Super-complaints

The Policing and Crime Act 2017 established a new system of police super-complaints.

A super-complaint is a complaint made to HM Chief Inspector of Constabulary that a feature, or combination of features, of policing in England and Wales by one or more police forces is, or appears to be, significantly harming the interests of the public. Super-complaints can be made in respect of any one or more of the 43 police forces in England and Wales, the National Crime Agency, the Ministry of Defence Police, the Civil Nuclear Constabulary and the British Transport Police.

Only a body designated by the Home Secretary may make a super-complaint. The legislation provides for the Home Secretary to decide which bodies may be designated and the criteria to be applied in making such decisions. Sixteen bodies were designated in June 2018.

Although each super-complaint must be made first to HM Chief Inspector of Constabulary, HMICFRS will decide with the College of Policing (CoP) and the Independent Office for Police Conduct (IOPC) whether it is eligible for consideration. If it is, we will jointly investigate the super-complaint and then representatives from HMICFRS, the CoP and the IOPC will consider what action should be taken, if any, in response. The outcomes could include:

- an inspection by HMICFRS;
- an investigation by the IOPC;
- changes to existing policing standards or support materials from the CoP;
- a recommendation that another public body is better placed to deal with the concern;
- a recommendation to one or more police forces to change practices or local policies;

- a recommendation to another public body or government department to take action to respond to the super-complaint or a related matter;
- finding the super-complaint needs no action; or
- finding the super-complaint is unfounded.

We expect to receive super-complaints during 2020/21. Based on the experience of previous investigations, it is likely that these will be on very different topics, and (if deemed eligible) will require very different investigations. We will work with our partner bodies (IOPC and CoP) to consider eligibility and allocate responsibility of these investigations. HMICFRS will investigate in the most efficient manner within the funding allocation for 2020/21. However, it is not yet possible to determine how far this funding will go.

Inspectorate capacity

This inspection programme and framework is predicated on there being a full complement of inspectors of constabulary, working full-time on the affairs of the inspectorate, during the inspection year in question. To the extent that this is not the case, and subject to the requirement for consultation specified below, this inspection programme and framework will have effect for such period and with such modifications as the chief inspector of constabulary shall specify and publish.

Before the chief inspector of constabulary makes any such modifications, he must first have consulted the Home Secretary and those local policing bodies and chief officers, and such other law enforcement bodies and policing institutions, as he considers likely to be affected by the modifications he proposes to make, and have taken into consideration their observations and representations timeously made.

HMICFRS's inspection framework

PEEL 2020

The PEEL inspection programme is an [assessment of the effectiveness, efficiency and legitimacy of police forces in England and Wales](#). In 2018, HMICFRS developed its approach to PEEL with the introduction of the Integrated PEEL Assessment programme (IPA). This brought together the three PEEL pillars (effectiveness, efficiency and legitimacy) into a single inspection. HMICFRS also introduced a risk-based approach, to concentrate on areas of the greatest risk.

HMICFRS plans to continue the evolution of PEEL in 2020/21 towards an intelligence-led continuous assessment model. This means making greater use of the breadth of evidence HMICFRS already collects on a force throughout the year to come to an assessment of performance. Evidence sources include:

- force management statements;
- findings from thematic and joint inspections;
- crime data integrity inspections;
- progress against causes of concern and areas for improvement;
- routine data collections;
- force liaison lead knowledge; and
- insight evidence collection.

There will be less reliance on an intense onsite fieldwork period, with the intelligence-led approach determining the need to collect further evidence during this period.

This will provide HMICFRS with a more dynamic view of current force performance across a range of policing functions. Causes of concern will be highlighted to a force as soon as they are identified, not just as part of the PEEL onsite evidence collection. This could trigger monitoring activity sooner and help forces improve their own performance by taking rapid action where improvement is needed. It will support local policing bodies in holding their chief constables to account and assist the public in holding their local policing bodies to account.

For further information on the evolution of the PEEL inspection programme, please see Annex A and Annex B.

Consultation question:

2. Are there any significant new or emerging problems in policing that HMICFRS should take into account in its inspection activity?

Local policing bodies' priorities

In the design of each inspection, and before carrying out fieldwork in each force, we examine and review in detail the local policing body's police and crime plan for the force, in order to be clear on its established local priorities. The police and crime plan is also used as a material source of information about the local circumstances and characteristics of the force, the police area in question, and the factors that affect considerations of public protection, crime and disorder, including demand – latent and patent – for police services.

Force management statements must also be sensitive to, and reflective of, local conditions and circumstances. They must show clearly how the chief constable discharges his or her statutory duty to have regard to the local policing body's police and crime plan.

College of Policing standards

CoP standards are of great importance to the improvement of policing and the achievement of consistency in practice. We always consider current CoP standards in the design of inspections and our assessments of forces.

Methodology, monitoring, assurance and insight

HMICFRS's monitoring process

HM Inspectors of Constabulary routinely and continuously monitor all police forces to promote improvements in police practice. If an HMI identifies a cause of concern about police practice, it is raised with the chief constable and the local policing body so they can take action.

Our routine monitoring activity is an integral part of continuous assessment. It is the process that provides assurance that performance is improving, where necessary by ensuring that causes of concern are being addressed. Onsite evidence collection is just one source of information that we use to assess and monitor force performance. Other sources of evidence that we use are force management statements, thematic inspections, and the knowledge and insight of our inspection staff throughout the year. We use this information to understand progress that forces are making against causes of concern using our digital monitoring portal. This helps to make our monitoring activity more effective.

Consultation question:

3. How else could HMICFRS adapt the way in which it acquires information, to take account of current circumstances and risks to public safety?

Follow-up from previous inspections

We conduct several follow-up activities throughout the year. They range from formal revisits (for instance, as part of the child protection inspection programme, and aspects of our PEEL programme) to offering support to forces in responding to our findings (for instance, in the custody inspection programme). We also track the progress that forces have made against the recommendations in our reports.

For the 2018/19 PEEL programme, we reduced by a third the number of questions we sought to answer in the inspections, and we carried out integrated, single inspections in each force rather than separate inspections. We will continue to use evidence from previous inspections to ensure, as far as practicable, that we are not asking the same question of a force more than once.

Approach to PEEL judgments

Since its inception in 2014, PEEL has adopted a four-tier structure for judgments: Outstanding; Good; Requires improvement; and Inadequate.

Consultation with interested parties has indicated that the current grading system creates strong incentives for forces graded as 'Inadequate' or 'Requires improvement', but that forces graded as 'Good' or 'Outstanding' have few incentives to improve. Additionally, the current system results in a very broad range of 'Good' – from the very good to the barely good.

An alternative would be to adopt a five-tier structure. A new category of 'Fair' would be created to reflect where we have identified an appreciable number of areas where the force should make improvements. This could provide a better picture of where improvements are needed, and better reflect force performance, by adding more nuance to judgments – separating the very good from the barely good. It would encourage those forces who are currently stable in 'Good' to continue to improve in line with our principal aim for PEEL 2020/21.

We intend to test and evaluate both the four- and five-tier approaches in parallel with this consultation as part of activity to pilot the new PEEL approach. A pilot will take place in three forces to cover a range of geographic, social and operational contexts. This will enable the methodology to be tested across a range of environments. We will use the results of the evaluation in conjunction with the responses to this consultation to decide whether to adopt a four- or five-tier structure for PEEL 2020/21 judgments.

HMICFRS's assurance obligations

As well as our statutory obligations to inspect and report on the efficiency and effectiveness of police forces and certain other bodies, we monitor and provide assurance about other aspects of policing. These include matters such as compliance by chief officers with the requirements of the Police National Database's statutory code of practice, and the *Strategic Policing Requirement*. We continue to conduct monthly reviews at force level to monitor statistics relating to the usage of the Police National Computer.

Advisory and reference groups

We regularly convene reference groups and advisory groups involving experts who have specific skills and experience in the areas that are inspected. We use their knowledge and advice to establish a sound methodology for inspections.

Group members are drawn from a wide range of relevant organisations, including several universities, the National Police Chiefs' Council, the Association of Police and Crime Commissioners and the CoP.

Our Technical Advisory Group (TAG) helps to design inspection programmes, so they are as effective and efficient as possible. TAG members include representatives of the National Police Chiefs' Council, the Association of Police and Crime Commissioners, the offices of police and crime commissioners, the CoP, the Home Office, the Office for National Statistics, staff associations, police forces and other specialist agencies.

Our Academic Reference Group (ARG) provides expert advice and discussion on the design and ethical considerations of new research projects that support inspections, the development of methodologies, and the evaluation of inspection methodologies and outcomes. The ARG members include academics from several universities with specialities in policing, research leads from other inspectorates (including the Care Quality Commission, Ofsted and HMI Probation), the Home Office, and other policing bodies including the CoP and the Police Foundation.

We also have other programme-specific reference groups covering, for example, our overall approach to PEEL inspections and specific aspects such as child protection and crime data integrity.

We received consultation responses asking us to consider using more public input when establishing our inspection methodology. As far as practicable, we will do so.

How to respond to this consultation

Please submit your answers to these questions, together with any other comments, by email to: HMICFRSPolicingInspectionProgrammeandFramework@hmicfrs.gov.uk no later than 1700 on 3 April 2020.

If you prefer, you can post responses to the Chief Operating Officer, HMICFRS, 6th floor, Globe House, 89 Eccleston Square, London SW1V 1PN.

If you have a complaint or comment about HMICFRS's approach to consultation, you can email this to:

HMICFRSPolicingInspectionProgrammeandFramework@hmicfrs.gov.uk

How consultation responses will be reviewed

HM Chief Inspector of Constabulary will consider respondents' views and, if he determines it appropriate to do so, change the proposed inspection programme and framework before putting it to the Home Secretary for approval. In accordance with the Police Act 1996, Schedule 4A, paragraph 2, HM Chief Inspector of Constabulary must obtain the approval of the Secretary of State before publishing his inspection programme.

[The final document, which will be appropriately revised to reflect the results of consultation, will be made available on HMICFRS's website.](#)

You should note that HMICFRS may publish consultation responses, or summaries of them, except where they have been provided in confidence. Please indicate in your response if you do not wish it to be published.

Annex A: PEEL 2020/21 consultation

The new approach to all-force inspections

The PEEL inspection programme is an [assessment of the effectiveness, efficiency and legitimacy of police forces in England and Wales](#). In 2018, HMICFRS developed its approach to PEEL with the introduction of the Integrated PEEL Assessment (IPA) programme. This brought together the three PEEL pillars (effectiveness, efficiency and legitimacy) into a single inspection. We also introduced a risk-based approach, to concentrate on areas of the greatest risk.

HMICFRS plans to continue the evolution of PEEL in 2020/21 towards an intelligence-led continuous assessment model. This means making greater use of the breadth of evidence HMICFRS already collects on a force throughout the year to come to an assessment of performance. Evidence sources include:

- force management statements;
- findings from thematic and joint inspections;
- crime data integrity inspections;
- progress against causes of concern and areas for improvement;
- routine data collections;
- force liaison lead knowledge; and
- insight evidence collection.

There will be less reliance on an intense onsite fieldwork period, with the intelligence-led approach determining the need to collect further evidence during this period.

This will provide HMICFRS with a more dynamic view of current force performance across a range of policing functions. Causes of concern will be highlighted to a force as soon as they are identified, not just as part of the PEEL onsite evidence collection. This could trigger monitoring activity sooner and help forces improve their own performance by taking rapid action where improvement is needed. It will support local policing bodies in holding their chief constables to account and assist the public in holding their local policing bodies to account.

Previously, when we have identified a cause of concern as part of a PEEL inspection, we have alerted the relevant police force(s) immediately so that remedial action can be taken. However, we have not reported that cause of concern and the associated recommendations more publicly until we have published the full force report. This can be some months after we initially uncovered the concern. In PEEL 2020/21, in order to better inform the public, we will immediately alert the police force when we discover a significant service failure that is putting public safety at risk. In certain circumstances,

we may also then publish a cause of concern and recommendations as soon as practicable thereafter. We intend to release this information via an update to the HMICFRS website. The full evidence base and background to the cause of concern will be covered in the force's next report, as will an update on the progress made against it. We do not propose to publish all causes of concern this way, only those immediately related to public safety. Other causes of concern (for example, those that relate to the organisation and running of the force) will be published in the force's report in the usual way.

HMICFRS will continue to publish a formal assessment and a report for each force during a PEEL cycle. This will be based on everything known about that force up to the point that we make our judgments.

We will aim to report on a force in public as soon as possible after the conclusion of onsite evidence collection. This means that we will no longer publish in set tranches: force reports will be published as soon as they are ready.

The principal aims of this approach will be to:

- contribute to improvements in policing;
- highlight problems at an early stage to reduce risk of failure; and
- improve effective democratic accountability.

HMICFRS currently assesses, judges and reports under the three separate PEEL pillars of effectiveness, efficiency and legitimacy. It is proposed that the structure of the PEEL assessment framework should be changed so that it better matches:

- the way police forces are organised;
- the demands they face; and
- the outcomes the public and their elected representatives justifiably expect of them.

HMICFRS proposes a high-level structure for the PEEL assessment framework that:

- better aligns the areas inspected (core questions) with force management statement demand categories;
- assesses the force's efficiency, legitimacy and effectiveness across each core question, to enable a rounded view of how well a force is performing in a specific area of policing; and
- allows assessments that consider factors that cut across core questions, or that are provided at a force level.

Using these principles, our proposal is that the PEEL assessment framework should be structured to focus on three principal areas:

- an **operational assessment** – how well services are provided;
- an **organisational assessment** – how well the police force is run; and
- a **service user assessment** – the outcome from the perspective of those receiving the services.

The **organisational assessment** considers factors that cut across core questions or are provided at a force level.

The **operational assessment** is the operationally focused core questions grouped together.

The **service user assessment** incorporates core questions relating to procedural justice and public treatment. It also includes a new victim service assessment (VSA), which looks at the service standards provided to and experienced by a victim of crime – from point of contact to outcome. The VSA incorporates the crime file review (as in previous PEEL inspections) and on a tri-annual basis it will include crime data integrity (CDI), which will become part of PEEL in 2020.

The proposed structure is summarised below:

| Area | Components |
|---------------------------|--|
| Organisational assessment | <ul style="list-style-type: none"> • Force governance • Organisational efficiency • Workforce |
| Operational assessment | <ul style="list-style-type: none"> • Preventing and deterring crime and anti-social behaviour • Responding to the public • Investigating crime • Protecting vulnerable people • Managing offenders and suspects • Serious and organised crime • <i>Strategic Policing Requirement</i> and specialist capabilities |
| Service user assessment | <ul style="list-style-type: none"> • Victim service assessment (including crime data integrity) • Procedural justice/public treatment assessment. |

Characteristics of good performance (which are comparable to the ‘Good’ element of our judgment criteria in previous years) have been identified for each core question to assess whether a force is performing well. These are based on recognised good practice, research evidence, and advice from senior leaders and practitioners. However, as with previous IPA and PEEL judgment criteria, they are not intended to be prescriptive or exhaustive.

The areas we will inspect in PEEL 2020/21 are broadly based on the current areas of inspection. However, they have been updated to:

- reflect current priorities, risks and standards;
- enable an assessment of effectiveness, efficiency and legitimacy in a specific area of policing; and

- increase the focus, where feasible, on outcomes and what matters to the public (better balance of outcomes versus process).

We have consulted extensively with external reference groups and national professional leads to develop the question set in the PEEL assessment framework. We are seeking further views as part of our public consultation. The proposed question set is included at Annex B.

Force context

HMICFRS has identified the need for better appreciation of the contextual factors that can have an effect on force performance. Our definition of a force's context is: "The group of factors which affect a force's performance, over which it has no (or very indirect) control." These factors can include the following:

- the force's income, and the balance between income from central government and council tax precept;
- the socio-economic status of the force area population;
- other demographics of the force area population, such as age;
- the rurality of the force area;
- the transport network in the force area; and
- the performance of other local services, such as schools and children's services, hospitals and mental health services.

In PEEL 2020/21, we will focus on understanding the impact of funding and demand on force performance. In the longer term, we will consider the effects of wider contextual factors on force performance.

Victim service assessment

As part of our development of PEEL, we propose to introduce an assessment focused on the experience of the service provided by forces to victims of crime. This will be known as a 'victim service assessment' (VSA). The VSA will consider the force's:

- call handling standards;
- response to victims;
- crime allocation arrangements;
- investigation standards; and
- suitability of the outcome of its investigations.

Also, because our 43 force inspections of CDI will be completed by April 2020, we will include CDI as an element of our VSA in each force on a tri-annual basis.

The VSA has been designed to:

- remove the need for a separate case file review (CFR) in those forces subject to a CDI inspection;
- remove duplication of work in listening to calls for service, and accessing and interpreting file logs for CFR, when these are already part of CDI inspections;

- significantly reduce the extent to which HMICFRS staff are in forces;
- introduce a new view for our inspection activity from the perspective of the victim; and
- identify best practice in forces.

The CDI methodology has been amended to support the reduction in the extent to which HMICFRS staff are in forces, and the integration into PEEL of the associated fieldwork. It will be reported as an element of each force's PEEL report.

Judgments and recommendations

Our approach to making judgments

As with all our PEEL inspections, the principal aim of PEEL 2020/21 is the promotion of improvements in policing. While maintaining their robustness, judgments should, to the greatest reasonably practicable extent, provide forces with information about the areas in which they need to improve, while providing a 'health check' assessment for the public. In making judgments, we consider all relevant evidence obtained about a force through our continuous assessment approach.

When HMICFRS first introduced PEEL judgments in 2014, there were detailed judgment criteria for each of the tiers: Outstanding, Good, Requires improvement, and Inadequate. Later, the approach was simplified, providing detailed criteria for 'Good' and 'Requires improvement' only. This worked well. HMICFRS proposes improving this further for PEEL 2020/21, by only specifying the characteristics of good performance. To be judged 'Good', a force will need to demonstrate these characteristics, bearing in mind that these are not intended to be prescriptive or exhaustive. If it exceeds this standard substantially – for example, with good practice and/or innovation – a force can expect to be judged 'Outstanding'.

In 2015, HMICFRS introduced markers called 'causes of concern' and 'areas for improvement', which provide better information for forces on which areas they should focus in order to improve. Our published definitions were:

- if HMICFRS's inspection identifies an aspect of a force's practice, policy or performance that falls short of the expected standard, it will be reported as one or more area(s) for improvement; and
- if HMICFRS's inspection identifies a serious, critical or systemic shortcoming in practice, policy or performance, it will be reported as a cause of concern.

If a force does not have the characteristics of good performance, decisions about the most appropriate graded judgment will be informed by our consideration of whether the failures in question constitute areas for improvement or causes of concern. The continuous assessment approach for PEEL 2020/21, which more closely aligns with our inspection and monitoring regimes, means that our approach to judgments should be clearer and more closely linked to causes of concern and areas for improvement.

We therefore propose that:

- if areas are identified where there is a cause of concern of sufficient materiality, the lowest tier of judgment should ordinarily be given; and
- if areas are identified where to an appreciable extent a force needs to improve, the force cannot ordinarily be considered 'Good'.

The level at which we make judgments

In previous iterations of PEEL, HMICFRS has published judgments at the pillar level (effectiveness, efficiency and legitimacy) and at the core question level – for example, 'How effective is the force at tackling serious and organised crime?'

Our consultation with interested parties has highlighted that, while pillar judgments are seen as useful for the public and the media, core question level judgments are more useful in helping forces to focus on specific areas that require attention.

The new PEEL assessment framework is no longer structured around the previous pillars. As a result, producing judgments at this higher level would cover very different strands of activity, which could give a misleading picture of performance for the public.

We propose that, for PEEL 2020/21, judgments should be given at the core question level only. This best serves the aim of promoting improvements in policing and highlighting where a force is doing well and where it needs to improve. In addition, when a force has a CDI inspection as part of its PEEL evidence collection (each force will be subject to a CDI inspection every three years), we will also publish a CDI judgment alongside the core question judgments.

In our report narratives, we will of course continue to fulfil our statutory obligation to report on the efficiency and effectiveness of forces. Organisational efficiency will also be assessed and reported upon.

The tiers of judgments

Since its inception in 2014, PEEL has adopted a four-tier structure for judgments: Outstanding; Good; Requires improvement; and Inadequate.

Consultation with interested parties indicated that the current grading system creates strong incentives for forces graded as 'Inadequate' or 'Requires improvement', but those forces graded as 'Good' or 'Outstanding' have insufficient incentives to improve. Additionally, the current system results in a very broad range of 'Good' – from the very good to the barely good.

Our proposed new approach to making judgments (explained above) goes some way to resetting the bar and will somewhat reduce the range of forces which qualify to be rated as 'Good'. However, in so doing, inappropriate comparisons may be made with previous years; some grades for some forces may change although performance has stayed the same.

Under a four-tier structure, our definitions for each of the grades would be as follows:

| Grade | Definition |
|----------------------|--|
| Outstanding | The force has substantially exceeded the characteristics of good performance |
| Good | The force has demonstrated substantially all the characteristics of good performance |
| Requires improvement | We have identified a sufficiently substantial number of areas where the force needs to make improvements |
| Inadequate | We have concerns and have made recommendations to the force to address them. |

An alternative is to adopt a five-tier structure. This would provide a greater degree of information on where improvements are needed, and better reflect force performance, by adding more nuance to judgments, for example by separating the very good from the barely good. It would encourage those forces who are currently stable in 'Good' to continue to improve. Under a five-tier structure, the definitions for each of the grades would be as follows:

| Grade | Definition |
|----------------------|--|
| Outstanding | The force has substantially exceeded the characteristics of good performance |
| Good | The force has demonstrated substantially all the characteristics of good performance |
| Fair | We have identified an appreciable number of areas where the force should make improvements |
| Requires improvement | We have identified a sufficiently substantial number of areas where the force needs to make improvements |
| Inadequate | We have causes for concern and have made recommendations to the force to address them. |

HMICFRS intends to test and evaluate both the four- and five-tier approaches in parallel with this consultation, as part of activity to pilot the new PEEL approach. The pilot will take place in three forces to cover a range of geographic, social and operational contexts. This will enable the methodology to be tested in a range of circumstances. HMICFRS will use the results of the evaluation in conjunction with the responses to this consultation to decide whether to adopt a four- or five-tier structure for PEEL 2020/21 judgments.

Collaboration and partnership principles

Police forces no longer provide all local policing services in isolation. All forces are involved in local strategic partnerships and most now collaborate with other forces, other public bodies and the private sector. They collaborate on important aspects of service, ranging from shared back office functions to significant frontline functions, such as tackling serious and organised crime, providing armed policing capability and response, and operating the National Police Air Service.

It is important that PEEL assessments are flexible enough to accommodate the breadth of these arrangements. The following principles are proposed:

- HMICFRS will consider the nature of collaboration arrangements when scheduling inspection activity in collaborated forces;
- collaboration arrangements may give greater benefits to some forces than others, so it will be possible to come to different judgments in different forces about the same collaboration agreement;
- PEEL assessments will not lead to judgments on how effective local partnerships are but will comment on the effectiveness of a force's contributions to local partnerships; and
- in the same way that HMICFRS will comment on decisions a local policing body makes if they have an effect (adverse or favourable) on the efficiency and effectiveness of a force, we will also state if another agency's decisions affect a force's efficiency and effectiveness.

It is right that, in a tight financial climate, public institutions should exploit opportunities to join up with other organisations to cut out duplication and provide better, more efficient services to the public. There is also a substantial and increasing amount of crime that transcends local, regional and national borders. Online fraud, online child sexual abuse, other forms of cyber crime, human trafficking, regional and national drug dealing – often along 'county lines' – are all examples of crimes that are not confined to local areas. Police force boundaries have a diminishing relevance in the face of these crimes. As a result, forces need to work not only together but also with other public bodies to prevent and tackle these crimes and keep people safe.

It is therefore appropriate that HMICFRS continues to consider these arrangements as part of its inspections.

Annex B: PEEL assessment framework question set

The PEEL assessment framework is structured to focus on three principal areas:

- an **operational assessment** – how well services are provided;
- an **organisational assessment** – how well the police force is run; and
- a **service user assessment** – the outcome from the perspective of those receiving the services.

To make these assessments, we will obtain evidence and make judgments by assessing police performance in respect of specific topics:

Operational assessment

1. How good is the force at preventing and deterring crime, anti-social behaviour, and vulnerability?

Topic areas

- The force prioritises the prevention of crime, anti-social behaviour, and vulnerability
- The force uses problem-solving and works in partnership to prevent crime, anti-social behaviour and vulnerability
- The force understands demand facing neighbourhood policing teams and manages resources in line with that demand.

2. How good is the force at responding to the public?

Topic areas

- The force identifies and understands risk effectively at initial contact
- The force provides a quality-appropriate response to incidents, including those involving vulnerable people
- The force understands the demand faced by officers initially responding to emergency calls and manages its resources to cope with that demand
- The force has a good understanding of the wellbeing needs of its contact management staff and officers initially responding to emergency calls.

3. How good is the force at investigating crime?

Topic areas

- The force understands how to carry out quality investigations on behalf of victims and their families
- Investigators provide a quality service to victims of crime
- The force understands the crime demand it faces and the resources it needs to meet it effectively
- The force manages the wellbeing of staff involved in investigations.

4. How good is the force at protecting vulnerable people?

Topic areas

- The force understands the nature and scale of vulnerability
- The force provides ongoing safeguarding and support for vulnerable people including those at risk of criminal exploitation
- The force works with other organisations to keep vulnerable people safe
- The force has a good understanding of demand and resources
- The force understands the allocation and productivity of resources when working with other agencies
- The force manages the culture and wellbeing of staff involved in protecting vulnerable people
- The force recognises and responds to vulnerability in all its forms.

5. How good is the force at managing offenders and suspects?

Topic areas

- The force is effective in apprehending and managing suspects and offenders to protect the public from harm
- The force effectively manages the risk posed by registered sex offenders (RSOs)
- The force has an effective Integrated Offender Management (IOM) programme
- The force understands the demand and the resources it needs to manage suspects and offenders effectively
- The force recognises and responds appropriately to the diversity of suspects and offenders.

6. How good is the force at managing serious and organised crime (SOC)?

Topic areas

- The force makes good use of all available intelligence to identify, understand and prioritise SOC and inform strong decision making
- Good management and governance support an effective, efficient and legitimate whole system response to SOC
- Disruptive activity reduces the threat from SOC (Pursue)

- The force prevents people from engaging or re-engaging in organised crime (Prevent)
- Communities, organisations and individuals are resistant and resilient to the impact of SOC (Protect and Prepare).

7a. How good is the force at meeting the requirements of the *Strategic Policing Requirement (SPR)*? *Ungraded question*

Topic areas

- The force understands its expected contribution to the SPR threats and plans accordingly
- The force assures itself it continues to have the capacity and capability to respond to the SPR threats
- The force plans effectively to meet changing future demands posed by the six SPR threats.

7b. How good is the force at protecting communities against armed threats? *Ungraded question*

Topic areas

- The force's response to threats needing an armed response or the use of weapons that are less lethal, is well-led
- The force complies with national procedures for the selection, acquisition and use of firearms, ammunition and specialist munitions
- The force has a good understanding of its current and future operational requirements to meet demand requiring an armed response
- The force works productively with neighbouring forces to share resources, build the capacity and reduce the cost of armed policing
- The force has consistent, rigorous and reliable systems in place to evaluate operational performance and make operational improvements
- Operational plans help the force to respond effectively to threats requiring an armed response.

Organisational assessment

8. How good is the force's governance?

Topic areas

- The force identifies and assesses threats and acts appropriately to reduce harm and mitigate risk
- The force manages performance well
- Force governance is effective.

9. How good is the force at operating efficiently, making sure it achieves value for money, now and in the future?

Topic areas

- The force manages current demand well
- The force makes sure it has the capability and capacity it needs to meet and manage current demands in the most efficient manner
- The force understands future demand and is planning to make sure it has the right resources in place to meet future needs
- The force makes the best use of the finance it has available and its plans are both ambitious and sustainable
- The force actively seeks opportunities to improve services through collaboration and makes the most of the benefits of working collaboratively in line with its statutory obligations
- The force can demonstrate it is continuing to achieve efficiency savings and improve productivity.

10. How good is the force at building, developing and looking after its workforce and encouraging an ethical, lawful and inclusive workplace?

Topic areas

- The force understands the wellbeing of its workforce and uses this understanding to develop effective plans for improving workforce wellbeing
- The force maintains and improves the wellbeing of its workforce and understands the effect of the action it is taking
- The force is building its workforce for the future
- The force is developing its workforce to be fit for the future
- Proactive and disruptive action taken by the force and effective vetting management reduce the threat and risk posed by police corruption
- The force promotes an ethical and inclusive culture at all levels.

Service user assessment

11. How good is the force's service for victims of crime?

Topic areas

- The force manages incoming calls, assesses risk and prioritises the police response well
- The force deploys its resources to respond to victims and incidents in an appropriate manner
- The force's crime recording can be trusted
- The force has effective arrangements for the screening and allocation of crimes for further investigation and these take into account vulnerability and risk

- The force carries out a proportionate, thorough and timely investigation into reported crimes, with senior level governance providing robust scrutiny
- The force makes sure that it follows national guidelines / rules for deciding the outcome it gives for each report of crime.

12. How good is the force at engaging with the people it serves and treating them fairly, appropriately and respectfully?

Topic areas

- The workforce understands how to use force fairly and appropriately
- The force understands and improves the way in which it uses force
- The force engages with all its diverse communities to understand and respond to what matters to them
- The workforce understands why and how to treat the public with fairness and respect
- The workforce understands how to use stop and search powers fairly and respectfully
- The force understands and improves the way it uses stop and search powers.

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