



Inspecting policing
in the **public interest**

HMIC's programme for regular force inspections

For consultation

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Her Majesty's Inspectorate of Constabulary

Her Majesty's Inspectorate of Constabulary (HMIC) independently assesses the efficiency and effectiveness of 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 over time and against others, and our evidence is used to drive improvements in the service to the public.

HMIC consults and works with other organisations on the inspection and assessment of police forces in England and Wales. HMIC also has a long history of conducting joint inspections with other inspectorates. HMIC does not have a statutory duty to inspect police and crime commissioners and their offices, but can be commissioned to inspect services on their behalf.

Our mission

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.

Contents

Foreword from HM Chief Inspector of Constabulary	4
Policing in England and Wales	5
The need for change	7
The new approach: all-force inspections	9
The proposed approach	11
Overview	11
Assessment framework	11
Frequency and structure of inspections	13
Reporting.....	15
Judgments and recommendations	17
Making judgments	17
Making recommendations	18
Collaboration and partnership principles	20
PEEL assessment practicalities	22
Gathering evidence	22
Reflecting the victim experience.....	23
Quality assurance and moderation.....	24
Report development and publication.....	24
Skills, expertise and knowledge	25
Interim assessment	27
The consultation	29
Consultation questions	29
How to respond to this consultation	30
How consultation responses will be reviewed	30
Annex A: Responses – confidentiality and disclaimer	31
Annex B: Design principles	32

Foreword from HM Chief Inspector of Constabulary

In November 2013, the Home Secretary asked HMIC to develop and implement a new programme of annual all-force inspections with a view to assessing the efficiency and effectiveness of policing in England and Wales. It will see forces judged and placed in one of four categories: outstanding, good, requires improvement or inadequate.

This will be a major undertaking for the inspectorate and will have significant implications for policing. It is therefore right that we hear as many views as possible as we develop the programme for these assessments. The assessments will judge whether your police force is providing an efficient and effective service.

Over recent years, HMIC has moved from reviewing and reporting on the efficiency and effectiveness of each force to focusing on specific issues across the police service. A thematic and risk-based approach has served to address areas of significant public interest and will need to continue.

Policing is changing and this necessitates a more consistent and accessible means for the public to assess the quality of policing as a whole in their area. This will complement the greater focus on forces' accountability to the public through directly elected police and crime commissioners.

In addition to inspections on specific issues, HMIC will set out a clear, objective and comprehensive assessment of the efficiency and effectiveness of policing in each force area. The new programme of inspections will give the public an easy-to-understand assessment of how their force is performing.

This document sets out our proposed approach for these new assessments. We are keen to hear your views. Throughout the document, we have asked a number of questions and your responses will inform the next stage of the programme's development.

I should like to thank you on behalf of Her Majesty's Inspectors for taking the time to read this document and I look forward to your responses.

Thomas P Winsor
HM Chief Inspector of Constabulary

Policing in England and Wales

- 1 In recent years, policing in England and Wales has undergone significant institutional, structural and operational reform. Since 2010, the substantial reforms to the institutions of the police have included:
 - the creation of police and crime commissioners¹ (PCCs) to improve accountability;
 - the establishment of the College of Policing to set standards, improve professionalism and develop a better understanding of what works;
 - the establishment of the National Crime Agency to tackle serious and organised crime;
 - more powers and resources for the Independent Police Complaints Commission (IPCC); and
 - an inspectorate that is more independent of government and more independent of the police service.
- 2 In addition, there have been wide-ranging changes to police terms and conditions of service, and there has been huge advancement in the use of technology, by both offenders and officers. These changes collectively amount to the greatest reform of the police for almost 100 years.
- 3 By far the most significant single change has been the introduction of democratically elected PCCs, one for each police force area. PCCs have replaced police authorities and set policing priorities through their local police and crime plans, set the budgets for their forces, and hold their chief constables to account.
- 4 The introduction of PCCs has been coupled with the abolition of government targets and a reaffirmation that operational responsibility belongs with the police. This reflects a move from bureaucratic accountability – where the police are held to account by central monitoring of targets and performance indicators – to local democratic accountability. Through the PCCs, the public now has a greater voice in determining the priorities of its local force.

¹ The term police and crime commissioners is used as shorthand to make reference to police and crime commissioners, the Mayor's Office for Policing and Crime in the Metropolitan Police Service and the Common Council of the City of London.

- 5 There are a number of independent regulatory and inspection bodies that scrutinise the police in the public interest and provide information on performance. The role of these bodies, which include HMIC and the IPCC, has been strengthened as part of the move to democratic accountability.
- 6 Some of these changes have been underpinned by legislation. The Police Reform and Social Responsibility Act 2011 made a number of significant changes to HMIC. It gave Her Majesty's Inspectors (HMIs) explicit powers of entry and access to information as well as a direct route of accountability to Parliament and the public.
- 7 The changes Parliament enshrined in law were a reflection of a changing policing world – one where democratic accountability could only successfully generate improvements if the public and the PCC had a clear, objective and robust sense of what was happening in their force.

The need for change

- 8 The significant changes to police accountability have required organisations supporting the process, such as HMIC, to review the ways they work to make sure they are fit for the future.
- 9 HMIC's role in publishing information about the quality of the service police forces provide facilitates greater public scrutiny. This information serves as the basis for a dialogue between the public and their local PCC – but only if the information is accessible, easy to understand and covers the issues in which the public are interested.
- 10 In recent years, the expectations of the general public in relation to the information they receive about public services has changed radically. The public are accessing more information, through more channels, more quickly and easily than ever before. In March 2014, YouGov² polled over 2,000 members of the public on behalf of HMIC to get their views of performance information on the police. We know from this polling that the majority of the public want information but few feel that that they are well informed about the police.
- 11 The information that HMIC provides needs to cover all aspects of policing and must take account of the complexities of policing in the modern age. The demand for the services of the police is changing, as is the nature of crime. The internet and associated technology have created conditions in which criminals have greater opportunities to operate in an environment that they believe to be safer, and where opportunities to offend are more readily or easily available. The internet has made new kinds of offending possible, and has increased the number of potential victims.
- 12 Inspections also need to be able to identify early signs of systemic problems across forces that could lead to issues like those seen in Mid Staffordshire hospital³. The last few years have seen a number of controversies and revelations of a serious and negative nature in relation to the conduct of some police officers – for example, conduct exposed by the Leveson Inquiry and the conclusions of the Hillsborough independent panel. Inspections need to put

² Unpublished YouGov Survey, March 2014

³ *Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry*, Sir Robert Francis QC, London, 2013

performance in to context, looking not just at the effectiveness of the force, but also the fairness and propriety of its processes.

- 13 In recent years, HMIC has monitored the efficiency and effectiveness of police forces through detailed analysis of performance and financial data and through thematic inspections, concentrating on areas of highest risk, greatest importance to the public and where things have gone wrong. It is our view that the balance of inspections has become too weighted towards thematic inspections. Having access to comparable assessments of force performance over a period of years allows forces and the public to identify, assess and monitor improvements or deterioration in service. Thematics, unless revisited routinely, do not provide the systematic analysis over time that provides the rich picture needed for democratic accountability, or the incentive for forces to improve year on year.
- 14 As the example of Mid Staffordshire hospital demonstrated, public institutions have their own sense of identity and characteristics born from their leaders, their work and their history. With these come inherent strengths and weaknesses. These strengths and weaknesses are often part of the institution and can be given insufficient emphasis in any thematic inspection focused on a single issue.
- 15 It is essential that those holding the police to account – the public and PCCs – have a reliable, impartial and expert assessment of the efficiency, effectiveness and legitimacy of core policing functions. The challenge is to provide this without unnecessarily increasing the demands on forces and continuing to provide detailed assessments of principal issues of concern when required. This will necessitate a change not only in what we do but also, crucially, how we do it.

The new approach: all-force inspections

- 16 In order to meet these challenges, as we set out in the consultation on our 2014/15 inspection programme⁴, HMIC will be carrying out a new annual programme of all-force inspections. The inspections will provide accessible, annual independent assessments of the performance of police forces. They will make it possible to see from a small number of easy-to-understand categories of police activity and assessment, how well police forces are performing.
- 17 The principal aims for the programme are to:
- improve effective democratic accountability;
 - inspect in a way that leads to the greatest practicable appreciable improvement in policing services; and
 - assist in identifying problems at an early stage and so reduce the risk of failure.
- 18 The inspection programme will provide information about what is happening in reality across a range of policing functions. This will help forces drive improvement in their own performance through comparison with the best performers. It will support PCCs in holding their chief constables to account and reduce the need for PCCs to conduct regular assessments. It will assist the public in holding PCCs to account.
- 19 The focus of the programme will be on three principal themes:
- efficiency: how well police forces provide value for money;
 - effectiveness: how well each force cuts crime, from anti-social behaviour to protecting vulnerable people and organised crime; and
 - legitimacy: how well each force provides a service that is fair and treats people properly.
- 20 The first two themes reflect HM Chief Inspector of Constabulary's statutory responsibility to provide an annual assessment of the efficiency and effectiveness of policing in England and Wales (section 54(4A), Police Act

⁴ HMIC's Proposed 2014/15 Inspection Programme for consultation, HMIC, London 2014

1996). The legitimacy of the police service is central to its effectiveness, and of sufficient significance to merit a third theme.

- 21 The name for the new programme will reflect these themes. The inspections will be called Police Efficiency, Effectiveness and Legitimacy assessments, or PEEL assessments.
- 22 In designing the PEEL assessment programme, HMIC has obtained the co-operation and constructive assistance of PCCs, police forces, the College of Policing and the Home Office, together with other inspectorates and senior academics and we have also carried out public polling. This collaborative work has helped to make the design of the new inspection programme as sound and efficient as possible to meet the needs of the public. The team used this engagement to establish a number of design principles that were used in developing the proposed approach. These principles can be found at Annex B at the end of this document.
- 23 The PEEL assessment programme will give HMIC a solid baseline to comment on the breadth of policing. It will reduce the need for additional thematic inspections and should, over time, lead to a reduction in the inspection demands that we place on forces.
- 24 The purpose of this consultation is to gather views on the approach HMIC uses to make PEEL assessments and the way the PEEL assessments will be presented.

The proposed approach

Overview

- 25 HMIC proposes the following principles to underpin the approach for PEEL assessments.
- Assessments will cover the range of activities that forces undertake.
 - There will be consistency in the way that assessments of different forces are carried out and reported upon. There will be a robust moderation process so that sound comparisons can be made between forces.
 - Inspections will be primarily based on qualitative evidence (i.e. descriptive information). Quantitative data will be used to support inspections.
 - The public's – and especially victims' – experiences of the police will be central to making an assessment.

Assessment framework

- 26 HMIC will build on the existing monitoring framework in place for forces, basing PEEL assessments on a set of core questions. The questions will be grouped around the PEEL themes of efficiency, effectiveness and legitimacy, as set out below.
- (a) Efficiency
1. Is the force maximising the efficiency of its operational resources?
 2. Does the force have a secure financial position for the short and long terms?
 3. Does the force have a sustainable workforce model for the comprehensive spending review period and beyond?
 4. Does the force have the leadership capacity that it needs?
- (b) Effectiveness
5. How effective is the force at reducing crime and preventing offending?
 6. How effective is the force at investigating offending?

7. How effective is the force at protecting those at greatest risk of harm?
8. How effective is the force at tackling anti-social behaviour?
9. How effective is the force at tackling serious, organised and complex crime?
10. How effective is the force at meeting its commitments under the Strategic Policing Requirement⁵?
11. How effective is the force at proactively ensuring public safety?

(c) Legitimacy

12. What are the overall public perceptions of the force?
13. How effective is the force at responding when a member of the public calls for service?
14. How well is the force meeting its responsibility to treat people equally and without discrimination?
15. Does the force's workforce act with integrity?
16. Are the data and information that forces provide about their work of a high quality?

27 The framework will be extended to provide more rounded assessments. In addition to the 16 questions, assessments will consider:

- local context to reflect the different demands faced by forces, different priorities set by police and crime commissioners, and the collaboration and partnership arrangements that forces have in place; and
- organisational factors that drive operational performance, such as: leadership; supervision and management; organisational culture; training; allocation of resources; use of technology; and how forces learn, improve and innovate.

⁵ *Strategic Policing Requirement*, HM Government, London, 2012

Frequency and structure of inspections

- 28 Each force will be inspected and reported on twice each year as part of the PEEL programme.
- Inspection 1 will cover effectiveness. It will focus in detail on how effectively forces prevent and reduce crime, and how effectively they investigate crime in the context of the demand they face and local priorities.
 - Inspection 2 will cover efficiency. It will consider how forces provide value for money, how they make best use of their resources to achieve the right outcomes for local communities, and whether their plans are sustainable in years to come.
 - Both inspections will cover elements of legitimacy, along with organisational factors and local context.
- 29 The findings from the two inspections will then be combined to give one fully integrated assessment.

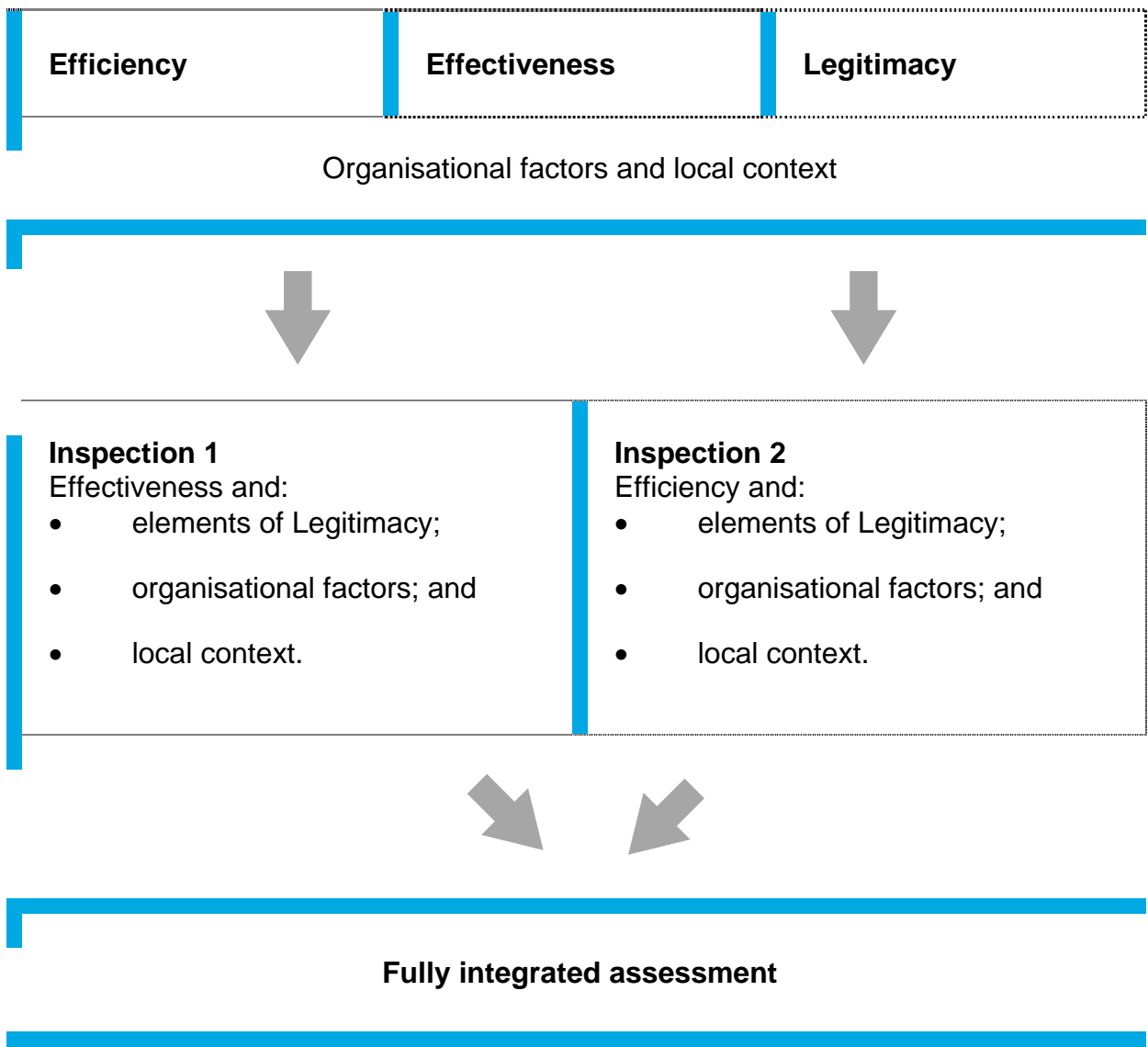


Figure 1: Structure of PEEL inspections

- 30 This approach of inspecting twice a year will provide an opportunity to revisit issues where it becomes apparent after the first inspection that additional information is required. It will also mean that forces are not penalised as a result of their position in the inspection timetable. For example, inspections will not be limited to one snapshot of a force at a certain point in the financial year and business planning cycle.
- 31 Our proposed approach, alongside the retention of some capacity to carry out thematic reviews, will also put HMIC in a position to identify and investigate national trends in policing at an early stage.

Reporting

- 32 We propose to produce a report after each inspection that includes judgments against individual elements of the assessment framework. These reports will then be brought together to provide annual assessments against the three themes, along with a view of the organisational health of the force in terms of leadership and management. We will use PEEL assessments and any additional inspection reports on specific subject areas of policing to provide a national overview of policing.

Consultation questions

- Q1. What do you think of the proposed approach? How could it be improved?**
- Q2. Are there any other aspects of police work you would like to see covered by PEEL inspections? If so, what are these?**

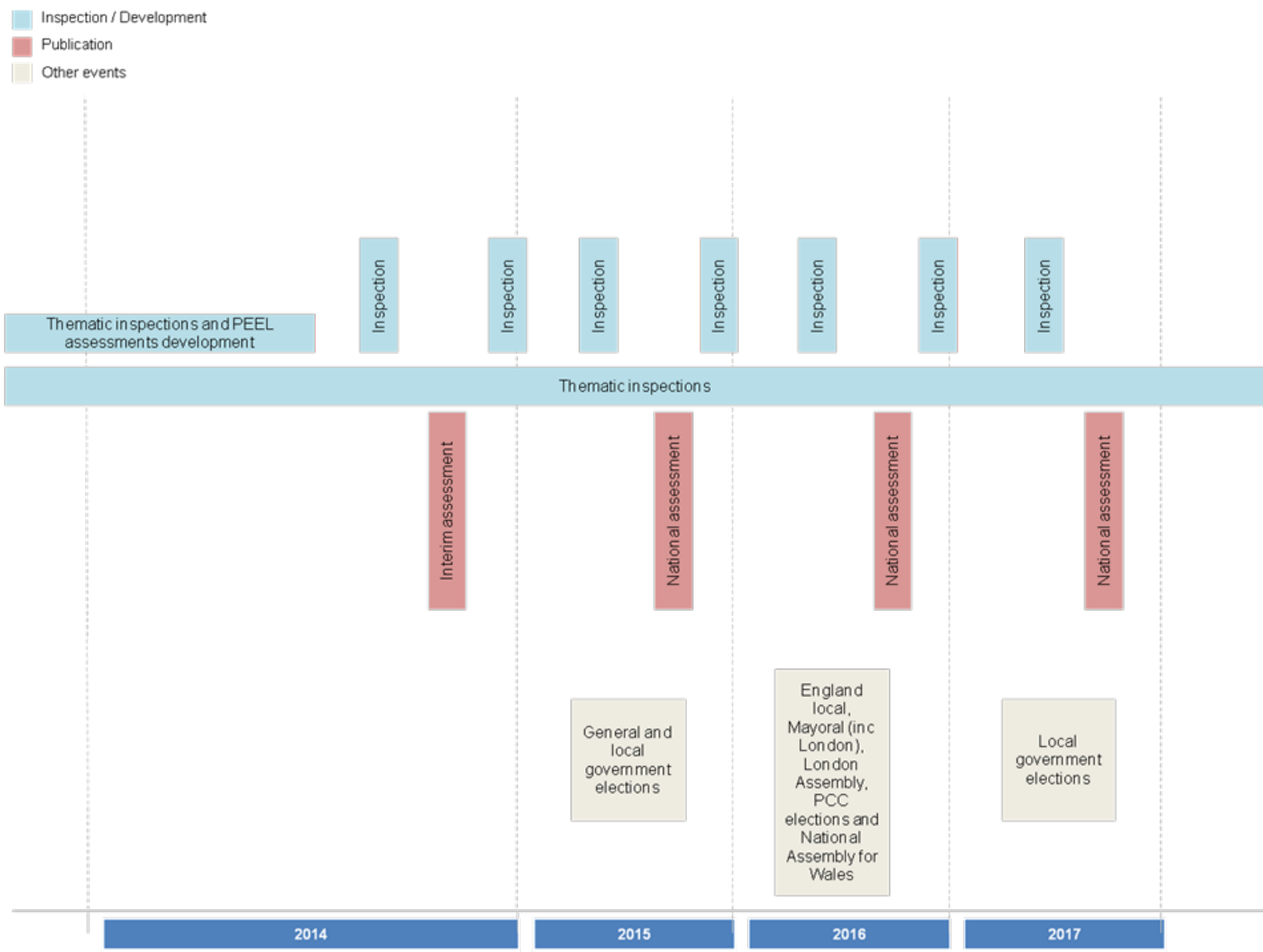


Figure 2: PEEL inspection programme timeline

Judgments and recommendations

Making judgments

- 33 HMIC has consulted the public and stakeholders about whether PEEL assessments should make judgments in relation to the services being inspected. The feedback is clear that we should. A review across the inspectorates shows that there are numerous ways of arriving at judgments. However, there are two common threads to the approaches used:
- transparency in relation to judgment criteria; and
 - judgments are based clearly on the available evidence.
- 34 HMIC proposes to use four judgments: two positive and two negative. Judgments will be made in connection with the three themes of efficiency, effectiveness and legitimacy, as well as individual elements of the inspection framework. The judgments reflect the terminology used by Ofsted. The Care Quality Commission has recently consulted on a proposal based on a similar model. The judgments will be:
- outstanding;
 - good;
 - requires improvement; and
 - inadequate.
- 35 In making these judgments inspectors will consider whether:
- the standard of policing is good, or exceeds this standard sufficiently to be judged as outstanding;
 - the force requires improvement in a given area because it is not yet performing at a good level, and/or there are some weaknesses in the organisation; or
 - the performance of the force in a given area is inadequate because it is significantly lower than might reasonably be expected.
- 36 We will publish criteria so that the way in which we arrive at judgments is clear. We will base judgment criteria on professional standards where they exist. Judgments will be accompanied by further information that will include comments on local context, and whether the force is improving or getting worse.

- 37 If a force is judged as inadequate against one of more of the themes, we propose the following steps.
- The force is automatically placed under formal review by HMIC's Crime and Policing Monitoring Group⁶.
 - Progress with resolving the problems identified should be monitored closely by the relevant HMI.
 - Follow-up inspection work (and publication of the findings) might follow, even before the force is visited again as part of the next round of routine inspections. This will be at the discretion of the HMI, dependent on the nature of the problems found.
 - Failure to make the necessary improvements would lead to escalation through the stages of the monitoring process (i.e. a letter to the PCC and, ultimately, referral to the Home Secretary).
- 38 This approach could be implemented if the force is judged as inadequate in any of the three PEEL themes. There may also be circumstances where a judgment of 'requires improvement' could trigger this approach. The decision will be subject to clear criteria, will be transparent, and ultimately will be the responsibility of the relevant HMI.

Making recommendations

- 39 Making recommendations will help HMIC to achieve two of the three aims of the PEEL programme: to inspect in a way that leads to improvement, and to assist in the identification of problems at an early stage. HMIC will be able to identify common themes emerging from the force recommendations and highlight where a national response might be appropriate.
- 40 HMIC is committed to making recommendations when an assessment has brought to light a clear problem that needs to be addressed. We are also proposing to make recommendations in relation to areas that could be improved. As well as making recommendations to police forces, we propose to make recommendations to other bodies, such as the Home Office and the College of Policing, where issues that arise from inspections need to be addressed by those bodies.

⁶ This is a group led by HMIC that keeps Home Office officials, representatives of chief constables and the Association of Police and Crime Commissioners informed about those areas that, in its professional judgment, might present significant risk to the public.

- Q3. Do you agree with the proposal to use four categories for making judgments? If not, how could it be improved?**
- Q4. Do you agree with the proposed approach to those forces that receive a judgment of inadequate? How could it be improved?**
- Q5. Is there anything else that we should include in our recommendations to ensure that they lead to improvement?**

Collaboration and partnership principles

- 41 Police forces do not provide 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 significant aspects of service, ranging from shared back office functions to front-line activities, such as the use of the National Police Air Support Unit and tackling serious and organised crime.
- 42 Many of the arrangements are complex and, although there is a statutory framework to be followed (sections 22A to 23I, Police Act 1996 and sections 5 to 7, Crime and Disorder Act 1998), there is no standard collaboration or partnership approach or arrangement. It is important that PEEL assessments are flexible enough to accommodate the breadth of these arrangements. We therefore propose the following principles.
- We will be mindful of collaboration arrangements in order to minimise inspection demands.
 - In the longer term, force management statements will identify local collaboration and partnership arrangements of which HMIC will need to be aware. (See page 22 below for more detail about force management statements.)
 - Collaboration arrangements may provide 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 judge the efficiency and effectiveness of local partnerships – this is beyond HMIC’s remit – but will comment on the force’s contribution to and benefits derived from those partnerships.
 - In the same way that HMIC will comment on decisions a PCC makes if they have an effect (adverse or beneficial) on the efficiency and effectiveness of forces, HMIC will state if another organisation’s decisions hinder or improve a force’s efficiency and effectiveness.
- 43 HMIC will work closely with relevant partner inspectorates so that we are able accurately to identify material issues before and after inspection. HMIC will work with other inspectorates so that it is best placed for the purposes of PEEL assessments to take account of anything that has a bearing on the service being provided. More specifically we will:
- identify relevant information before inspection so that we understand the context and can direct our work accordingly;

- ensure our work assists other inspectorates, in particular informing any assessments or recommendations that partner inspectorates may make to other local organisations; and
- if appropriate, consider using the powers available under Schedule 4A of the Police Act 1996 to explore opportunities and the need to work jointly, take on or delegate powers to other inspectorates.

Q6. Do you have any comments on our proposed approach to inspecting partnership and collaboration arrangements?

PEEL assessment practicalities

- 44 Like police forces, we need to do our work efficiently, effectively and with legitimacy. This will not only apply to what we do but to how we do it. The introduction of PEEL assessments provides an opportunity to build on those elements of our inspection activity that work well and stop those that do not.

Gathering evidence

- 45 HMIC has listened to forces' concerns, fed back through various channels including the consultation on HMIC's inspection programme⁷, about the amount of data and information they provide during an inspection. As PEEL assessments commence, our objective will be to change the way in which we inspect so as to minimise any unnecessary demands on forces. We will do this by:
- using publicly available information where possible;
 - working with forces to make more data publicly available via force management statements (see below);
 - introducing clear, easy-to-understand templates to specify the information we require;
 - being consistent wherever possible;
 - preparing thoroughly to focus our fieldwork and make the best use of force time;
 - using unannounced inspections where appropriate to minimise unnecessary or inappropriate preparatory work by forces; and
 - using technology to ensure the management of data is efficient and minimises duplication.
- 46 In his Independent Review of Police Officer and Staff Remuneration and Conditions (2012)⁸, Tom Winsor recommended that HMIC should establish a national template for a force management statement, to be published by each

⁷ *HMIC's 2014/15 inspection programme*, HMIC London 2014.

⁸ *Independent Review of Police Officer and Staff Remuneration and Conditions*, Cmnd 8024, 2012.

force with its annual report. The recommendation stated that the statement should contain data on:

- projected demands on the force in the short, medium and long terms;
- plans for meeting these demands, including financial plans; and
- steps the force intends to take to improve efficiency and economy with which it will maintain and develop its workforce and other assets, and discharge its functions to the public.

47 The statement should also report on performance in the last year against projections made for that year in the previous force management statement.

48 We will be working over the next few months to develop a template for these statements. The aim is for the statements to provide a significant amount of the factual information that will underpin PEEL inspections, thereby reducing the demands on forces as the force management statement matures. We will complement force management statements by developing a system that minimises the number of requests for data.

Reflecting the victim experience

49 We are committed to ensuring that the views of victims are fully reflected in each PEEL assessment in terms of how well forces meet the needs of their victims, and how forces develop their services in response to feedback from victims. Assessments will also consider how well forces adhere to the Code of Practice for Victims of Crime, which was published in October 2013 by the Ministry of Justice.⁹

50 We have already undertaken some consultation on how, through inspection, we can better understand the victim experience. Having considered the responses to this consultation, we are proposing the following approach:

- quantitative and qualitative data will be used in combination;
- assessments will consider how forces make distinctions between different types of victims; and
- assessments will cover processes, outcomes and how services are being improved.

⁹ *Code of Practice for Victims of Crime*, Ministry of Justice, London, 2013.

- 51 We will minimise the demands placed on forces by building on victim satisfaction data they and PCCs already gather. We recognise that PCCs currently are assessing the local need for victim support services in advance of assuming responsibility for victims' services commissioning in October 2014, and where practicable we will draw on information that becomes available through that process.
- 52 HMIC recognises there are limitations to the data that is currently collected by forces. National guidelines for victim surveys only require that the victims of violent crime, burglary, vehicle crime and racist crime are asked for their views. In addition, victim surveys exclude victims of sexual offences, domestic violence, and those aged under 16. As a result of this, HMIC will use a range of techniques to gather qualitative and contextual information, such as consulting focus groups and online forums. HMIC will engage with the voluntary sector to improve the quality of data collected and to help reach those victims who are less likely to engage with the police.

Quality assurance and moderation

- 53 HMIC is committed to ensuring good quality assurance processes are built into the PEEL assessment process at critical points. This includes the development and publication of our judgment criteria and moderation processes. These will help forces to understand clearly what to expect from us and what we in turn will expect from them. All inspections will be subject to robust moderation so that forces are assessed and judged consistently.
- 54 We will be asking the public each year whether PEEL assessments provide them with the information they need to tell them how well their force is performing. We will be developing the detail of the evaluation over the next few months, and it will include obtaining full and frank feedback from each force after each inspection to identify what worked well and what could be done better.

Report development and publication

- 55 The public is at the heart of our work, and the way in which we communicate our findings, judgments and recommendations to the public will be central to our ability to meet our objective of improving effective democratic accountability. Our reports must also be designed so that it is clear to police forces what needs to improve.

- 56 Our reports will be presented in various formats in order to meet the range of needs of these different audiences. These will include:
- a report summarising the principal deficiencies across all forces;
 - content on our website that provides ready access to further detail; and
 - short narratives for local media and interested parties such as local councillors.
- 57 Our decisions on the detail of how we report has been and will continue to be influenced by polling undertaken by YouGov for HMIC in relation to what information on policing the public is interested in. The polling found that:
- local media is considered an essential source of information about the work of the police. People said that if they wanted to look for performance information they would look on their force's website or in the local media;
 - crime rates and statistics dominated responses concerning the types of information people would find most interesting. The aspects of policing that were of the greatest interest in terms of performance information were how the police respond when asked for help, how the police deal with anti-social behaviour, and crime investigation; and
 - 71% of those polled felt that it was important to have information about whether a force's performance is improving or getting worse. Descriptive text on the strengths and weaknesses of the police was of interest to 63% of people.
- 58 As we develop them, we will test our reports with a variety of interested parties – including the public and police forces – so that they meet the needs of those who will use them.

Skills, expertise and knowledge

- 59 Such a considerable expansion of our work means we need more people. Our need is primarily for an increase in inspection staff, as well as specialist support such as communication and analytical teams. We have recruited from police forces and the civil service.
- 60 We will provide a comprehensive training programme for all new staff. This will include an inspection course which staff will complete before participating in inspections. The new inspection training will focus on specialist skills: interviewing, facilitating focus groups and report drafting, and will have an appreciable practical element. Our longer-term aim is for HMIC to have an

externally accredited inspection training course, and work is underway to achieve this.

- 61 HMIC will continue to use several types of peer inspector: force subject matter experts and experts from the voluntary community sector and local partners providing public services. Peer inspectors have been used successfully to date and we have received positive feedback about the value they have added. Feedback includes: having a fresh and different perspective, bringing additional expertise and challenging both the force and HMIC on their approaches. We will develop a policy to make best use of peer inspectors.

- Q7. Do you have any comments on our proposed approach to gathering evidence?**
- Q8. Do you have any comments on our proposed approach to gathering information from victims?**
- Q9. What else should we consider doing to make the PEEL assessments as fair as they can be?**
- Q10. Do you have any comments on our proposed approach to reporting to the public?**

Interim assessment

- 62 Not all the staff we require for the PEEL programme are yet in place, and so we will not have the time or capacity to carry out a full PEEL assessment this year. We will, therefore, be carrying out an interim PEEL assessment, using the three themes of efficiency, effectiveness and legitimacy, and the assessment will be published by the end of November 2014.
- 63 There are a number of ways in which the interim assessment will facilitate the achievement and application of the aims and principles of the PEEL assessment programme. We will present the public with information about the performance of each force, providing a level of assurance about the efficiency and effectiveness of policing in England and Wales to support democratic accountability. We will draw out the main findings and recommendations from force inspections undertaken in the last 12 months, thereby inspecting in a way that leads to worthwhile improvement in policing. We will take individual force findings, overall conclusions for each of the themes and the outcome of thematic reports in the last 12 months to provide a national picture of emerging issues to assist in identifying problems at an early stage and reducing the risk of failure.
- 64 The interim assessment will inform development of the full assessment and provide the opportunity to test new methodologies. We will also to learn from the reaction of police forces, the public, the media, politicians and other interested parties so that we can improve future PEEL assessments, in particular the full assessment scheduled for November 2015.
- 65 As our methodology for the PEEL assessments programme is not yet fully developed, interim assessments cannot be as comprehensive about each force as our 2015 assessment will be. The PEEL assessments programme is being developed because there is currently no single comprehensive and rounded picture of individual police forces or national policing. The process of designing the interim assessment has made us intensify our focus on what more we need to do to ensure we have a sound knowledge of the state of the police.
- 66 We will incorporate into the interim assessment the main findings and recommendations of other inspections we have carried out in the previous 12 months, including those concerning crime data integrity, making best use of police time and domestic abuse. Judgments will be made where force inspections were designed with that intention, specifically the force inspections for valuing the police 4, crime, and police integrity and corruption. We will also include those inspections that have not covered all 43 forces but that are

nevertheless material to achieving a more accurate picture for the forces concerned.

67 The interim assessment will provide an individual assessment for each of the 43 police forces as well as an overview of policing in England and Wales. The assessment will include the following.

- Assessments of all 43 forces. These will draw out information from recent and new reports into one report for the force. The principal audience for these reports will be the public and will give information on how well their force is performing in respect of a small number of categories of police activity and assessment. Where appropriate, the reports will link to recent and new force inspections.
- National theme summaries. There will be three national summary reports on each theme: efficiency, effectiveness and legitimacy. They will provide a summary of how well we judge forces are performing and provide some of the detail underpinning the national overview.
- A national overview. This will draw information from the national theme summaries and other inspections undertaken in the last year.

68 We will reflect the feedback from this consultation in our interim assessment where this is possible in the time available.

The consultation

69 Alongside this consultation document, HMIC will be engaging with the public and other interested parties in a variety of ways. We will use a range of targeted methods including electronic communication and face-to-face engagements to reach as many people and organisations as possible.

70 The aims of the consultation are to:

- ensure target audiences understand – and have the opportunity to comment on – the proposed approach;
- engage in a variety of ways with different people and organisations;
- use meetings that HMIC already holds with interested parties to provide a forum for engagement on the preferred option; and
- ensure the public and other interested parties have the information they need to respond fully to the public consultation.

Consultation questions

- Q1. What do you think of the proposed approach? How could it be improved?
- Q2. Are there any other aspects of police work you would like to see covered by PEEL inspections? If so, what are these?
- Q3. Do you agree with the proposal to use four categories for making judgments? If not, how could it be improved?
- Q4. Do you agree with the proposed approach to those forces that receive a judgment of inadequate? How could it be improved?
- Q5. Is there anything else that we should include in our recommendations to ensure that they lead to improvement?
- Q6. Do you have any comments on our proposed approach to inspecting partnership and collaboration arrangements?
- Q7. Do you have any comments on our proposed approach to gathering evidence?
- Q8. Do you have any comments on our proposed approach to gathering information from victims?
- Q9. What else should we consider doing to make the PEEL assessments as fair as they can be?
- Q10. Do you have any comments on our proposed approach to reporting to the public?

How to respond to this consultation

Please submit your answers to these questions, together with any other comments you may have, by email to haveyoursay@hmic.gsi.gov.uk no later than Friday 29 August 2014. If you prefer, you can post your responses to Chief Operating Officer, HMIC, 6th Floor, Globe House, 89 Eccleston Square, London, SW1V 1PN.

If you have a complaint or comment about HMIC's approach to consultation, please email haveyoursay@hmic.gsi.gov.uk.

How consultation responses will be reviewed

HM Chief Inspector of Constabulary will consider respondents' views and, where appropriate, reflect the comments in the methodology as it develops.

The results of the consultation will be made available on HMIC's website at www.hmic.gov.uk/consultations.

Our approach to disclosing responses is set out in Annex A.

Annex A: Responses – confidentiality and disclaimer

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA)).

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory regime and Code of Practice with which public authorities must comply and which deals, among 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, if you email your response, will not, of itself, be regarded as binding on HMIC.

HMIC will process your personal data in accordance with the DPA. In the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Annex B: Design principles

Ref.	Criterion	Description
<i>Aims-related</i>		
1	Supports accountability	Proposals should be designed to facilitate accountability in policing. For a proposal to meet this criterion, there should be evidence that demonstrates that it is likely to facilitate accountability (as opposed to an assertion that it will).
2	Facilitates improvement	Proposals should be designed to facilitate improvement in policing. For a proposal to meet this criterion, there should be evidence that demonstrates that it is likely to help police forces or PCCs make improvements to the services they provide or oversee.
3	Helps identify failure before it happens	Proposals should be designed to identify failure in police activity before it happens. For a proposal to meet this criterion, there should be evidence that demonstrates that it will allow us to spot likely failure before it happens.
4	Supports other benefits	Proposals should be designed to achieve one or more of the other objectives of the assessments.
<i>Assessment-characteristics-related</i>		
5	In the public interest	Proposals should be aimed at ensuring that the public interest should be at the heart of the assessments. For a proposal to meet this criterion, it must be clearly grounded in what is in the public interest, even if that is at the expense of the interest of the force, PCC, government or any other policing institution.
6	Supports a broad assessment of policing activity	Proposals should be aimed at ensuring that the assessments cover the breadth of policing activity.
7	Shows what is happening in the force	Proposals should be aimed at ensuring that the assessments reveal what is happening in reality. For a proposal to meet this criterion, it must show how it will support exposition of the service that is actually being provided, not just that which appears to be being provided.

8	Are consistent	Proposals should be aimed at ensuring that the assessments are consistent, between forces, between different parts of the assessment, and over time.
9	Are evidence – based and explainable	Proposals should be aimed at ensuring that the assessments are evidence-based.
10	Take into account local priorities and the contextual differences between forces	Proposals should be aimed at ensuring that the assessments take into account local priorities, and the differences between forces (i.e. those over which they have little or no control).
11	Benefits outweigh the costs	Proposals should be aimed at ensuring that the benefits of gathering evidence and making assessments (to the public and the police service, and others) outweigh the costs (to HMIC and to the service).
12	Identify the good as well as the bad	Proposals should be aimed at ensuring that the assessments identify good practice as well as failure.
13	Avoids unintended consequences	For a proposal to meet this criterion, the possible unintended consequences of implementing the proposal must have been identified. These could be unintended consequences in relation to the likely actions of the police, or the effects on the public.
<i>Development-characteristics-related</i>		
14	Informed by the views of the public	For a proposal to meet this criterion, the views of the public (including the general public, victims of crime, and/or representatives such as local councillors) on the proposal should have been taken into account.
15	Informed by the views of PCCs	For a proposal to meet this criterion, the views of PCCs on the proposal should have been taken into account.
16	Informed by the views of the service	For a proposal to meet this criterion, the views of the service (including chief officers, technical experts, the College of Policing, and front line staff) on the proposal should have been taken into account.
17	Informed by learning from the past, and from elsewhere	For a proposal to meet this criterion, any relevant learning from history (e.g. previous approaches used to assess the police) and from other sectors (e.g. the approaches of other inspectorates and equivalent bodies) will have been taken into account.

18	Evaluated	For a proposal to meet this criterion, it must be possible for HMIC to evaluate the effectiveness of the proposal once it has been implemented.
19	Timely	For a proposal to meet this criterion, it must be possible to implement it within the timescales required of the programme.
20	Future proof	For a proposal to meet this criterion, there should be good reason to believe that future developments (e.g. issues in the public interest, in policing, in government policy and in HMIC) would not prevent the proposal from being implemented successfully in the longer term.