

Crime inspection 2014

Dyfed-Powys Police

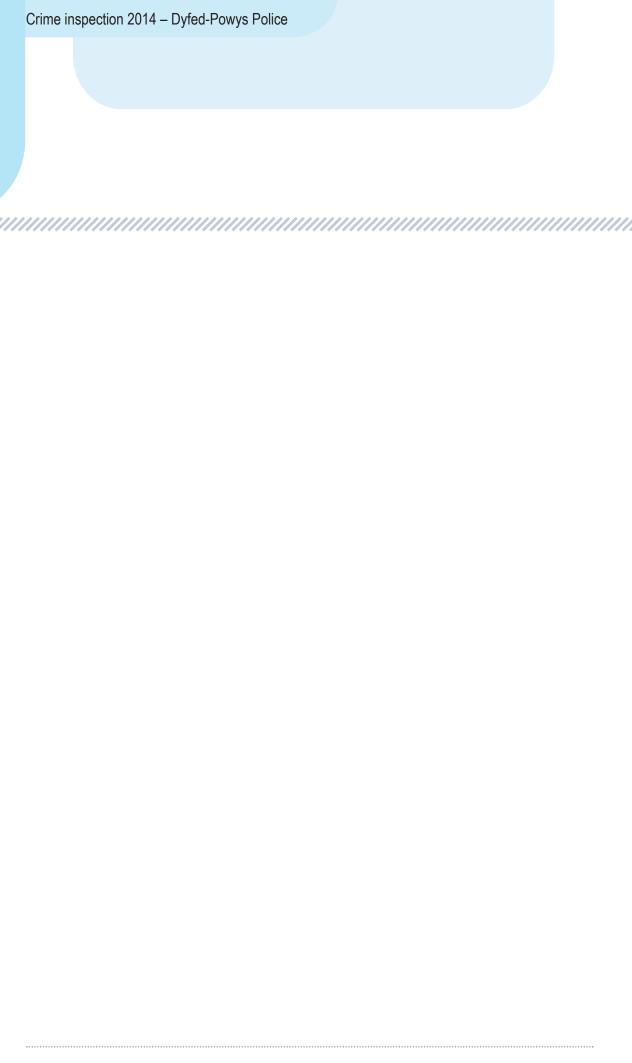
November 2014

© HMIC 2014

ISBN: 978-1-78246-625-3

www.justiceinspectorates.gov.uk/hmic





Contents

How effective is the force at cutting crime?	4
Introduction	6
Methodology	7
How effective is the force at reducing crime and preventing offending?	8
How effective is the force at investigating offending?	14
How effective is the force at tackling anti-social behaviour?	18
What each judgment means	21

How effective is the force at cutting crime?

Overall summary

HMIC found that Dyfed-Powys Police works effectively to cut crime. Crime levels in the area are below those across England and Wales as a whole, and they have fallen at a similar rate to the national picture over the past four years. However, the anti-social behaviour rate is higher in Dyfed-Powys than England and Wales as a whole.

Tackling anti-social behaviour is a clear priority and there is a commitment at all levels of the force to understanding local concerns and tackling anti-social behaviour. The force works well with local partners to cut crime and anti-social behaviour, and to provide support to victims.

This year, HMIC undertook an inspection into the crime data integrity of all 43 police forces, to determine the extent to which police-recorded crime information can be trusted at a national level. HMIC has serious concerns about Dyfed-Powys Police's approach to crime recording, which is not as accurate as it should be. Individual force reports are available at http://www.justiceinspectorates.gov.uk/hmic/.

How effective is the force at reducing crime and preventing offending?

How effective is the force at investigating offending?

How effective is the force at tackling anti-social behaviour?

Good

The Dyfed-Powys Police force area remains one of comparatively low crime, and crime has decreased at around the same rate as for England and Wales as a whole over the last four years.

The force is improving its approach to victims and there is a commitment from the leadership to provide a victim-centred service. The force is taking steps to better understand the causes of victim dissatisfaction and, despite financial cuts, it is still committed to sending an officer to attend every crime.

Dyfed-Powys Police has good working relationships with partners to prevent crime and reduce offending, and it has plans to develop these further.

Good

Dyfed-Powys Police recognises the importance of providing an effective response to victims and identifying vulnerability at the first point of contact. The quality of victim contact is good for those victims assessed as highrisk, but there are some inconsistencies in the way other victims are treated.

HMIC found that investigations are generally carried out effectively and supervision is good. CID detectives in the force are professionally trained and accredited, but the training in investigations for uniformed officers is more limited.

There is some good work in dealing with the most prolific offenders through a joined-up approach with partners, tackling those offenders causing the greatest risk to the public to prevent them from re-offending.

Good

Anti-social behaviour is a clear strategic priority for Dyfed-Powys Police and well understood by staff.

There is a strong commitment at all levels in the force to understanding and tackling local concerns.

The force works well with local partners to share information and find joined-up solutions to anti-social behaviour problems.

There is a good focus on understanding and managing the risk to victims of anti-social behaviour, and ensuring that they get the service they need from the police and partners.

Introduction

This inspection looks at how effective police forces are at cutting crime. The public expects the police to reduce, prevent and investigate crime, bring suspects to justice and, in conjunction with other services and agencies, care for victims. To assess each force's effectiveness, we looked at three specific areas:

- · How effective is the force at reducing crime and preventing offending?
- How effective is the force at investigating offending?
- How effective is the force at tackling anti-social behaviour?

Methodology

During our inspection we analysed data and documents from forces, and conducted in-force inspections. We interviewed the senior officers responsible for crime, neighbourhood policing and victim care in each force. We held focus groups with frontline police officers, investigators and police staff, and observed their activities first hand. We also reviewed 20 crime investigations in each force and interviewed heads of partner organisations such as local authorities. We focused on anti-social behaviour and the offences of: burglary dwelling; serious sexual offences; and violence with injury on this inspection. We chose to focus on these offences because they cover the areas of acquisitive and violent crime and the protection of vulnerable people. This has allowed us to make an assessment of how well the force treated the victim throughout the investigation – examining in particular how well officers gathered evidence and how well they were supervised.

Victims are at the heart of this inspection. Victims are entitled to a service from the police; this includes regular information about their case, an opportunity to provide an impact statement where relevant and to be consulted on potential criminal justice outcomes. When the police provide this service to victims, it increases victim satisfaction and builds trust and confidence in the police.

As part of this inspection, we considered how well forces deal with domestic abuse, alongside other offence types. HMIC published a report in March 2014 on how well forces tackled domestic abuse and provided support to victims. As a result of that inspection all forces were asked to provide an action plan setting out how they were improving services to victims of domestic abuse and we have reviewed the action plans developed by forces. The action plans have not informed the judgments made in these reports.

The crime inspection provides HMIC with the first opportunity to test whether the force's approach to improving how it tackles domestic abuse is beginning to have an effect and this forms part of our overall assessment of the force.

How effective is the force at reducing crime and preventing offending?

HMIC looked at how the leadership of the force deploys its resources to reduce the volume of crimes being committed, maximise the quality of victim contact, and ensure that the force focuses on community priorities whilst mitigating national threats.

We looked at how the force prevents crime, how it uses police tactics such as stop and search powers to prevent and detect crime and reduce offending. We also looked at how the police work with other agencies such as social services to reduce crime.

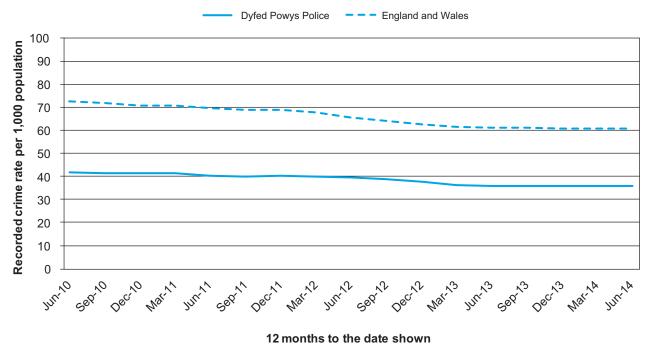
Crime

In 2010 the Home Secretary set a clear priority for the police service to cut crime. When compared with the 12 months to June 2010, recorded crime (excluding fraud) in the 12 months to June 2014 reduced by 14 percent in Dyfed-Powys compared with a reduction of 16 percent across all forces in England and Wales.

Over this period, victim-based crime (i.e., crimes where there is a direct victim such as an individual, a group, or an organisation) decreased by 18 percent in Dyfed-Powys, compared with a reduction of 16 percent across England and Wales.

During the 12 months prior to the end of June 2014, recorded crime (excluding fraud) in Dyfed-Powys reduced by 1 percent, compared with a 1 percent reduction across England and Wales.





By looking at how many recorded crimes and incidents of anti-social behaviour occur per 1,000 population, we get an indication of how safe it is for the public in that police area. The table below shows crime and anti-social behaviour rates in Dyfed-Powys (per 1,000 population) compared with the rest of England and Wales.

12 months to June 2014	Dyfed-Powys Police rate (per 1,000 population)	England and Wales total rate (per 1,000 population)
Crime excluding fraud	35.8	60.7
Victim-based crime	27.0	53.9
Sexual offences	1.0	1.2
Violence with injury	4.5	5.9
Burglary in a dwelling*	2.1	8.9
Anti-social behaviour incidents*	40.6	36.8

^{*}Note that anti-social behaviour data is for the 12 months to March 2014 and the rate for burglary in a dwelling is the rate per 1,000 households, not population.

We have chosen these types of crime to give an indication of offending levels in the force area. We are not judging the effectiveness of the force on recorded crime rates only. For information on the frequency of other kinds of crimes in your area, go to www.justiceinspectorates.gov.uk/hmic/crime-and-policing-comparator

Dyfed-Powys' detection rate (for crimes excluding fraud) for the 12 months to the end of March 2014 was 51 percent which was higher than the 26 percent for England and Wales.

The new crime outcomes framework was introduced in April 2014. It replaces a previous framework for recording how the police finalise investigations through what was known as 'sanction detections' (e.g. charges and/or summons). The new crime outcomes framework is designed to support police officers to use their professional judgment to ensure a just and timely outcome which reflects the harm to the victim, the seriousness of the offending behaviour, the impact on the community, and which deters future offending. Data on the full range of outcomes achieved as a result of investigations (not just detections but also, for example, community resolutions such as mediation known as restorative justice) will be available from July 2015 and used in future HMIC inspections.

Meeting the needs of the community

The police and crime priorities for Dyfed-Powys are set out in the police and crime commissioner's plan. Force leaders ensure that police activities are aligned to deliver these priorities through the force process for assigning tasks. At a local level, the force engages directly with the community to understand local safety concerns and to make sure that local priorities are properly addressed. For example, it reduces vehicle crime by distributing crime prevention leaflets and identifying unlocked cars, locating the owner and giving them crime prevention advice.

The force has strong connections with its rural communities and its focus on anti-social behaviour shows it is recognising what matters locally. It uses a range of community communications channels, ranging from social media to more traditional community meetings, leaflet distribution, personal visits and stories in the local media. It also produces bi-lingual leaflets to encourage members of the community to participate in different consultation forums. Despite the large geographical area covered by a relatively small force, Dyfed-Powys Police is still committed to sending a police officer to attend every report of a crime.

Quality of victim contact

HMIC found that Dyfed-Powys Police has made some positive changes to become more victim-focused. For example, there is an evident commitment to victim care throughout the force's criminal justice process. The quality of victim care is seen by officers as just as important as the successful prosecution of an offender. This is recognised by local partners. Partners also noted that the force has improved the care it gives to victims of sexual offences. This has been helped by funding from the office of the police and crime commissioner to develop two new sexual assault referral centres (SARCs) to provide extra facilities across the force area.

Like all forces, Dyfed-Powys Police carries out a regular survey of victims of crime. It identified that more could be done to gather feedback and understand the causes of victim dissatisfaction with police services. It has commissioned Victim Support to conduct extra phone surveys three days a week with general feedback directed to the local inspector and any thematic issues fed back to the appropriate superintendent. Partners recognise that the force is open to receiving feedback, both positive and negative.

An important measure of the impact of changes to service delivery for the public is how satisfied victims are with the overall service they receive when they seek police assistance. In the 12 months to the end of June 2014, Dyfed-Powys Police had a victim satisfaction rate of 86.0 percent (± 2.6 percent), which is broadly in line with the satisfaction rate in England and Wales of 85.0 percent (± 0.2 percent). Its current rate is also broadly in line with the 84.1 percent (± 4.6 percent) recorded for Dyfed-Powys in 2013.

Use of police tactics

Dyfed-Powys Police uses a wide range of tactics to address both force-wide and local issues. The force has invested in automatic number plate recognition (ANPR), which helps it to prevent and detect crime. This has resulted in some significant successes in detecting offenders either before or after a crime is committed (in particular, relating to burglary). Given the large geographical area and sparse population, the use of ANPR allows the force to both respond effectively and protect the community.

The force analyses burglary trends to identify hotspots, run crime prevention awareness campaigns and help residents protect their properties against burglary. It also makes good use of analysis to identify other crime trends. It then liaises with the appropriate police team to implement and monitor an action plan for that crime trend or affected area. With a low crime rate and a sparse population, the force has a strong focus at a local level on being aware of what is going on and responding appropriately. We found that the force is effective in identifying and understanding the threats and risks to local communities and across the force. It is also effective in moving resources around the force to target specific risks.

The force is about to introduce mobile data technology for officers across the force. This has significant potential to improve service delivery and efficiency. Officers will be able to access force information and to update force systems remotely. They will no longer need to travel long distances back to a station. Instead they will be able to spend more time out on patrols and in their communities. While the force has specialist assets that tackle organised crime groups, all staff understand that they too have a role to play by submitting intelligence and working with partners to protect the community.

Partnership working and information sharing

Dyfed-Powys Police has strong working relationships with partners. These include having police officers working from the same base as local authority staff, and voluntary sector staff supporting victims of sexual offences working from police stations. As part of the integrated offender management (IOM) approach, there is joint working between police and probation services dealing with the most prolific offenders. Partners value the joint working and recognise that the processes to share intelligence are developing all the time. There is joint work under way to better understand and tackle hidden crimes such as human trafficking. For example, a multi-agency risk assessment conference (MARAC) has been set up to look at trafficking, and joint operations have already taken place.

A multi-agency safeguarding hub (MASH) has been planned for some time. This will bring together police, probation, voluntary sector, and health and social services into one single location. It will enable all these agencies to work together to share information and agree a

joined-up approach to supporting and protecting domestic abuse victims and their families, as well as other vulnerable victims. Partners have also agreed that the MASH will include oversight of resources dedicated to tackling modern slavery. Although progress is being made to establish the MASH, the force should ensure that there are no further delays. Some partners are still concerned that there has been insufficient consultation regarding the development of the MASH process.

Domestic abuse

In March 2014 HMIC published the results of its inspection of 43 forces on the effectiveness of the police approach to domestic violence, with a focus on outcomes for victims and whether risks to victims are adequately managed. This included clear recommendations for each force about improvements it should make. As a result of this inspection all forces were required to produce and publish an action plan setting out the steps they were taking to improve the services to victims of domestic abuse. This plan should demonstrate that HMIC recommendations are being addressed and also explain how:

- the leadership will ensure the changes necessary and hold the right people to account;
- the police response when a victim first contacts them (by a 999 call or by visiting a police station) and when they first attend the scene of the incident is improved;
- the force will ensure there is a high quality investigation of all domestic abuse crime;
- · victims will be properly supported and offenders properly managed; and
- the training and learning provided to officers ensures they can give the best available response to the victim.

HMIC has made an initial consideration of the action plan submitted by Dyfed-Powys Police. We found that the force has produced a plan that outlines activity that is in line with the agreed national priorities outlined above. There is no clear direct reference to the specific HMIC recommendations for the force, although evidence within the action plan details activity being carried out that supports what is required by those recommendations.

The crime inspection provided us with our first opportunity to test whether changes in the force's approach to domestic abuse were beginning to have a positive effect.

HMIC found evidence that Dyfed-Powys Police has made good progress to improve its response to domestic abuse. Positive action is taken against offenders in a high percentage of cases and we identified there are good standards of investigation and supervision. The daily management process scrutinises and prioritises domestic abuse and a force-wide initiative 'Operation Baltic' is requested to provide specific interventions for high-risk

perpetrators. To ensure continued improvement domestic abuse cases are regularly dip sampled and standards reviewed by the deputy chief constable.

Recommendations

• Dyfed-Powys Police should continue to work with partners to ensure that there are no further delays in establishing a multi-agency safeguarding hub (MASH).

Summary

Good

- The Dyfed-Powys Police force area remains one of comparatively low crime, and crime
 has decreased at around the same rate as for England and Wales as a whole over the
 last four years.
- The force is improving its approach to victims and there is a commitment from the leadership to provide a victim-centred service. The force is taking steps to better understand the causes of victim dissatisfaction and, despite financial cuts, it is still committed to sending an officer to attend every crime.
- Dyfed-Powys Police has good working relationships with partners to prevent crime and reduce offending, and it has plans to develop these further.

How effective is the force at investigating offending?

HMIC looked at the range of police tactics and powers used by the force to investigate offending, including how investigations are conducted, whether persistent offenders are diverted from crime and how people vulnerable to repeat crime are supported. We looked at how the force learns from experience in order to improve professionalism in operational practice and leadership.

Vulnerability, risk and victims

The force's IT systems are not used to identify automatically whether a caller is a repeat victim; some extra checks by call handlers are needed. However, repeat and vulnerable victims are identified through these further checks and questions asked by the call handler in order to decide on the speed of response required. As well as sending an officer to deal with an incident, incidents are passed to specialist officers to follow up if necessary; for example, anti-social behaviour incidents to neighbourhood units and domestic abuse incidents to the Protecting Vulnerable People Units (PVPUs).

HMIC found that compliance with the Code of Practice for Victims of Crime is mixed. Officers are routinely giving victims contact plans, which set out how and when they will be updated with the progress of their case. We found that communication with victims is generally good, particularly for high-risk victims, although there is some inconsistency in the quality of communication with those deemed to be medium or low-risk. For example, our review of investigation files showed that communication and victim care are good for victims of domestic abuse but less so in other assault cases. Non-specialist officers showed some awareness of the Code of Practice, but had received little or no training. As a result, special measures for intimidated witnesses and victim personal statements are not used routinely. The force acknowledges this lack of training and is currently addressing it. Partners felt that two-way communication and liaison with the force in relation to victims and vulnerability are good.

Investigation

Force policy requires attendance at every crime. This is seen by the force and partners as important in maintaining the confidence of isolated rural communities. Also, those opportunities to gather evidence are not missed. The force operates a flexible crime investigation policy based on the seriousness of the offence. The most serious offences are always investigated by trained detectives; domestic abuse and sexual offences are always passed to specialist public protection officers. Most of the remaining investigations are dealt with by the most suitable resource available. This flexible approach is shown by burglaries in one division being investigated by the Criminal Investigation Department (CID) while, in another, uniformed officers may investigate with oversight from a CID supervisor.

This approach also allows victim vulnerability to be taken into account when determining the most appropriate resource. HMIC found the process was well-understood and observed close co-operation between different units. A review of crime files by HMIC showed a culture of positive action in both domestic abuse and other assault cases. Supervisors are clear as to what is expected from them, and the levels of supervision were found to be effective.

The force has established a programme of professional investigation training for detectives in the CID to become accredited investigators. There is a general lack of professional investigation training for uniformed officers. Training for these officers tends to be limited to online self-learning through the National Centre for Applied Learning Technologies (NCALT) packages. Officers and police and community support officers (PCSOs) have been trained in 'restorative justice', a means of concluding investigations out of court. Restorative justice is being used wisely by Dyfed-Powys Police and is proving an effective alternative to prosecution, particularly for the under-17 age group.

Tackling repeat and prolific offenders

Dyfed-Powys Police has invested significant resources in establishing strong partnership arrangements for managing the most prolific offenders who pose a risk to the public. The force recognises that preventing re-offending needs a joined-up approach from all partners locally. This integrated offender management (IOM) approach brings together police and probation, as well as the Department for Work and Pensions, and housing providers. It has improved the way officers deal with priority offenders.

There is careful selection of the offenders who will benefit from being included in IOM. When an offender is selected, the force works with partners to produce a bespoke plan that is designed to help the offender stop offending. There are good links with the neighbourhood teams, so they are kept informed about the progress of the IOM programme for offenders in their area. Each neighbourhood can also nominate an IOM offender, who is not complying with his or her programme or is causing a significant problem, for enhanced targeting. This includes increased engagement via home visits, contact when seen by patrolling officers and rigorous enforcement of any specific conditions. In the enhanced targeting process, there is assessment by a selection panel and final approval by the assistant chief constable to ensure that the action taken is proportionate.¹

There is no standard national definition of who should be considered for IOM arrangements. Dyfed-Powys Police uses its own scoring system to decide who needs to be managed in this way.

Learning from experience

HMIC found that there is some room for improvement in the way the force learns from what is effective and shares good practice. There is good analysis of data and intelligence to show trends in crime or anti-social behaviour over a four-year period. These reports are used to guide resourcing and deployment, and to provide a predictive element for future planning. However, there is limited analysis of the results of police activities and operations to find out which tactics have been the most effective in cutting crime. Analysts are not involved in any 'lessons learned' meetings. At a local level, there are examples of good practice leading to positive outcomes in communities. For instance, PCSOs have identified and engaged with frequent callers to better understand their concerns and so reduce demand on police call-outs. However, there is no mechanism or systematic way in which this good practice can be shared with either local partners or across the rest of the force.

The force also takes part in a multi-agency Case Scrutiny Panel. This looks at the whole life of a case, with examples generally brought forward by the Crown Prosecution Service. It was not clear that any learning was disseminated from these reviews to promote improvements in services to the public.

Dyfed-Powys Police has a strategic Learning Lessons Board that is chaired by the deputy chief constable. This looks at the lessons learned from formal police complaints, and operational and legal issues. However, HMIC found that its remit is limited and there is little knowledge of its operation or achievements around the force.

Recommendations

Within three months, Dyfed-Powys Police should develop and commence the
implementation of an action plan to improve the quality of victim service and contact by
ensuring that investigating officers are aware of the duties contained within the Code of
Practice for Victims of Crime, specifically in relation to the provision of victim personal
statements and special measures.

- Within three months, Dyfed-Powys Police should develop and commence the implementation of an action plan to improve the quality of investigation that will ensure uniformed officers have received the learning and development required to fulfil their investigative duties.
- Within six months, Dyfed-Powys Police should ensure that there are methods in place to:
 - (a) systematically review and evaluate the benefits from both current tactics and new crime fighting and anti-social behaviour initiatives;
 - (b) systematically capture learning and good practice in crime prevention and local problem solving; and

(c) share learning and good practice across the force.

Summary

Good

- Dyfed-Powys Police recognises the importance of providing an effective response
 to victims and identifying vulnerability at the first point of contact. The quality of
 victim contact is good for those victims assessed as high-risk, but there are some
 inconsistencies in the way other victims are treated.
- HMIC found that investigations are generally carried out effectively and supervision is good. CID detectives in the force are professionally trained and accredited, but the training in investigations for uniformed officers is more limited.
- There is some good work in dealing with the most prolific offenders through a joined-up approach with partners, tackling those offenders causing the greatest risk to the public to prevent them from re-offending.

How effective is the force at tackling anti-social behaviour?

HMIC looked at how the force prevents and tackles anti-social behaviour; in particular the way victims are treated. We looked at the quality and consistency of victim contact across the force and whether victims of anti-social behaviour were dealt with in a comparable way to victims of other crimes.

Community contact and victim care

Dyfed-Powys has a higher rate of anti-social behaviour incidents than the figure for England and Wales. There is a strong focus on anti-social behaviour by the police. Staff at all levels understand the importance of providing an effective response to victims and tackling anti-social behaviour appropriately. Incidents are scrutinised at a monthly strategic force meeting. There is a clear and rigorous procedure for identifying anti-social behaviour when the public contact the police for help. Call handlers are trained to use a system that assesses the threat and risk to the victim in each case. A call that is assessed as high-risk must be referred to the duty inspector for their oversight and an immediate police response.

The neighbourhood policing teams work closely with their communities. Neighbourhood officers and PCSOs are well aware of the need to identify and support victims, and this is backed by good local knowledge of their communities. HMIC found evidence of effective engagement and communication from local teams with their communities through a variety of mechanisms including social media, Police and Communities Together (PACT) meetings, OWL (neighbourhood watch system) and maintaining a visible presence in the community. The first issue of a 'Community Outcomes' newsletter has just been published electronically, with hard copies distributed to key stakeholders, libraries and post offices as a way of informing the community about action taken. The central neighbourhood development hub is reviewing different practices of community engagement by divisions.

Anti-social behaviour is a clear priority for PCSOs, and they are the primary resource for tackling it in their communities. There is good evidence that they spend a high proportion of their time policing within the community. They use a set of question to assess risks to a victim, decide on their level of vulnerability and ensure that they can provide appropriate support to the victim thereafter.

Partnership working

Neighbourhood policing teams work closely with local partners and share information about anti-social behaviour. Local police information, together with partner information and intelligence, is used to produce detailed analysis of anti-social behaviour incidents. These are used to guide intervention, disruption and enforcement strategies. The force has a dedicated lead analyst for anti-social behaviour who attends local meetings for assigning tasks, and there is also a partnership analyst.

The anti-social behaviour intelligence system provides an opportunity to share information across the force and with partners. It is widely used and provides real-time information to frontline officers to guide their activities. Neighbourhood policing teams attend monthly problem-solving forums with partner agencies.

Improving services to the public

Tackling anti-social behaviour is a clear priority for the force. As a comparatively low crime area, Dyfed-Powys has more anti-social behaviour incidents than it does crimes, and staff at all levels understand the importance of tackling it. In the 12 months to March 2014, Dyfed-Powys Police recorded 20,958 incidents of anti-social behaviour. This is a reduction of 12 percent against the previous 12 months. Dyfed-Powys Police and its partners have historically dedicated significant resources to tackling anti-social behaviour and have delivered high levels of service.

Recent local authority cuts have resulted in the withdrawal of funding for some local authority anti-social behaviour posts. Previously, local authority anti-social behaviour co-ordinators would receive referrals, issue warning letters and, if appropriate, escalate matters to the police. Neighbourhood policing supervisors are doing their best to provide cover, but concerns were raised that they may not do the role justice because of other commitments. The force has put an interim process in place to deal with incidents of anti-social behaviour and the police and crime commissioner has commissioned a new approach for the future.

The anti-social behaviour intelligence system is valued by staff and partners. The system enables individuals to be risk assessed as low, medium or high. Low and medium-risk cases are considered and reviewed at sergeant level, and high-risk cases at inspector level. Visits are undertaken for low and medium-risk cases on a bi-weekly basis; high-risk cases are reviewed or visited on a daily basis.

Summary

Good

 Anti-social behaviour is a clear strategic priority for Dyfed-Powys Police and well understood by staff. There is a strong commitment at all levels in the force to understanding and tackling local concerns.

- The force works well with local partners to share information and find joined-up solutions to antisocial behaviour problems.
- There is a good focus on understanding and managing the risk to victims of anti-social behaviour, and ensuring that they get the service they need from the police and partners.

What each judgment means

HMIC uses four categories for making judgments, two are positive and two are negative. The categories are:

- outstanding;
- good;
- · requires improvement; and
- inadequate.

Judgment is made against how well the force cuts crime. In applying the categories HMIC considers whether:

- the way the force is cutting crime and reducing offending is good, or exceeds this standard sufficiently to be judged as outstanding;
- the force requires improvement in the way it cuts crime, and/or there are some weaknesses; or
- the force's effectiveness at cutting crime is inadequate because it is significantly lower than is expected.