

Proposed policing inspection programme and framework 2018/19

For consultation

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Foreword

This is the first year that we are consulting on proposed inspection programmes and frameworks for Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), reflecting the fact that our remit now includes the inspection of fire and rescue services in England. This document concerns our proposed policing inspection programme and framework for 2018/19; we are consulting separately on our inspection programme and framework in relation to fire and rescue services.

Our annual all-force PEEL¹ inspections will continue to be a cornerstone of our activity, but this year we are proposing to focus our activity on areas that present the greatest risk. In 2018/19 we intend to carry out PEEL inspection work in a more integrated way, with fieldwork taking place once a year in each force and the areas for inspection determined according to our assessment of risk.

Our assessment of risk will draw on what we already know about each force, including our analysis of data and the results of previous inspections. In addition, we will draw on the information included in force management statements. These statements will contain, in a common format, information reasonably required for the purposes of inspection. They will enable HMICFRS to make judgments as to the efficiency and effectiveness of the force while helping to identify the areas of the force's activities which present the greatest risk to the public.

A fundamental part of our work over the last few years has been the assessment and comparison of information and performance about and between forces and over time. We intend this work to continue, including through our programmes of national and thematic inspections. While our changes to the PEEL programme will mean that our inspections may feel very different for some forces, comparison with results from previous years will still be possible. The PEEL programme will continue to provide important evidence on the state of policing in each force and throughout England and Wales.

Finally, in 2018/19 we expect to implement arrangements for handling super-complaints, once the relevant regulations have been made. The ability of designated bodies to make super-complaints will further strengthen the governance framework for policing in England and Wales.

(Sgd.) Thomas P Winsor

Sir Thomas P Winsor ws

HM Chief Inspector of Constabulary

¹ PEEL: Police effectiveness, efficiency and legitimacy.

Consultation introduction

This document provides details of HMICFRS' proposed programme of policing inspections for 2018/19, and 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 counter-terrorism, fraud and cyber-fraud, older people in the criminal justice system, cyber-crime, child protection and crime data integrity cover areas that are of most concern to you at the moment?
2. To what extent do you agree with the proposal for a more sophisticated approach to incorporating risk in our PEEL assessments?
3. To what extent do you agree with the proposal that our PEEL assessments should make greater use of information from monitoring and force management statements?
4. What do you see as the greatest opportunities, risks and difficulties as we move towards an integrated PEEL assessment?

These questions are repeated in the body of this document. At the end of the document there is an explanation of how you can let us have your views.

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 which we believe the public wishes 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.

Introduction

This document provides details of HMICFRS' proposed inspection programme and framework for policing for 2018/19.

Types of inspection HMICFRS will conduct in 2018/19

PEEL assessments

PEEL is the inspection programme in which HMICFRS draws together evidence from its annual, all-force inspections that cover the effectiveness, efficiency and legitimacy of the police. The PEEL annual assessment provides graded judgments on forces' performance. HMICFRS' PEEL assessments are designed to provide a year-on-year comparison, enabling the public to see how each police force's performance changes over time, and how it compares to the performance of other forces.

National thematic inspections

Our national thematic inspections are in-depth examinations of specific policing matters, which are usually identified through HMICFRS' monitoring processes or other inspection activity, or as a result of a commission from the Home Secretary. These inspections tend to identify areas of strong and weak practice in specific forces, but result in recommendations that are relevant to the police service as a whole. Fieldwork for the national thematic inspections usually takes place in at least six forces, but it can involve all 43 forces in England and Wales.

Commissions from the Home Secretary and local policing bodies

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

Similarly, police and crime commissioners, the Mayor's office for Greater Manchester, and, in London, the Mayor's Office for Policing and Crime and the Common Council for the City of London police area, may, at any time, ask HMICFRS to carry out inspections or reviews of the police forces they oversee.

Inspection of national agencies and non-Home Office forces

In relation to policing, HMICFRS has a statutory responsibility to undertake inspections of the following national agencies and non-Home Office forces:

- National Crime Agency (NCA);
- Police Service of Northern Ireland;
- British Transport Police;

- Armed Forces Police;
- Ministry of Defence Police;
- Civil Nuclear Constabulary; and
- Her Majesty's Revenue and Customs.

In addition, 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 the Channel Islands.

Counter-terrorism and security-related inspections

HMICFRS inspects the police response to certain national security threats.

Joint inspections

HMICFRS works with other organisations to conduct joint inspections. These 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 inspections², 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.

Our most frequent partner organisations are the other criminal justice inspectorates: HM Crown Prosecution Service Inspectorate, HM Inspectorate of Probation and HM Inspectorate of Prisons. The joint inspection work we conduct with these inspectorates (which includes inspections of custody suites with HMI Prisons) is detailed in the separate Criminal Justice Joint Inspection Plan 2018/19, which was published on the HMICFRS website in November 2017³.

² These are short, focused inspections that are carried out on a multi-agency basis. More information is available from: www.justiceinspectorates.gov.uk/hmicfrs/our-work/child-abuse-and-child-protection-issues/joint-targeted-child-protection-inspections/

³ *Criminal Justice Joint Inspection Programme Business Plan 2017–18*, Criminal Justice Joint Inspectorates, November 2017. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/criminal-justice-joint-inspection-business-plan-2017-18

An overview of HMICFRS' proposed inspection programme for policing 2018/19

PEEL programme

In previous PEEL assessments, the same set of methods was used to inspect each of the 43 forces. From 2018, HMICFRS plans to move to an integrated approach to PEEL assessment, as outlined on page 11.

As in previous years, forces will be assessed and given graded judgments. The categories for the 2018 PEEL inspections will remain the same as in previous years: outstanding, good, requires improvement and inadequate.

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; and observations of police practice. We will also use force management statements, as to which see page 12.

National thematic inspections

Some elements of planned thematic inspections for 2018/19 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, however, that thematic inspections remain an essential part of HMICFRS' programme of work and will continue to take place alongside the PEEL inspections.

Our proposed thematic inspections include hate crime, counter-terrorism, fraud (including cyber-enabled fraud), older people in the criminal justice system, cyber-crime and HMICFRS' rolling programmes concerning child protection and crime data integrity. Crime data integrity inspections assess whether police forces record and categorise crimes correctly.

Consultation question

1. Do the proposed thematic inspections of counter-terrorism, fraud and cyber-fraud, older people in the criminal justice system, cyber-crime, child protection and crime data integrity cover areas that are of most concern to you at the moment?

Vulnerability and child protection inspections

Protecting vulnerable people is a fundamental part of policing. HMICFRS assesses the police response to threats to and crimes against vulnerable people in several of our inspection programmes, including custody inspections and specific questions in the PEEL inspections.

HMICFRS also has two rolling child protection programmes:

- 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. The inspections also include scrutiny of the treatment of children in custody, and assessment of how the force is structured, led and governed in relation to child protection services. Six new inspections are planned for 2018/19, in addition to re-inspections or re-visits of some forces. Inspections also collect evidence about emerging or new areas of concern (such as the use of children in county lines offending)⁴.
- 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. Eight new joint targeted area inspections are planned for 2018/19.

Both of these child protection programmes will produce thematic findings, as well as findings relating to specific forces. HMICFRS will communicate the thematic findings, including through national and regional events, reports and close work with other inspectorates, to ensure all forces can consider common themes and take action as needed.

In 2018/19 HMICFRS will publish the results of the first components of our hate crime inspection programme (conducted jointly with HM Crown Prosecution Service Inspectorate). We will also conduct work to follow up on previous inspections relating to victims of honour-based abuse; forced marriage and female genital mutilation; and modern slavery and human trafficking.

⁴ County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns, using dedicated mobile phone numbers known as 'deal lines'.

Inspection of national agencies and other non-Home Office forces

Subject to further discussion with the organisations concerned, in 2018/19 we are planning inspections of:

- National Crime Agency (NCA);
- Police Service of Northern Ireland;
- British Transport Police;
- Armed Forces Police;
- Ministry of Defence Police;
- Civil Nuclear Constabulary;
- Her Majesty's Revenue and Customs; and
- police forces in British Overseas Territories (particular territories yet to be determined).

Super-complaints

The Policing and Crime Act 2017 established a new system of 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 than one police force is, or appears to be, significantly harming the interests of the public. This new regime will also apply to the National Crime Agency.

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. It is expected that charities and voluntary organisations will apply to be designated bodies. The Home Office consulted from October to December 2017 on the criteria to be applied when deciding which bodies should be designated.

Although super-complaints must be made first to HM Chief Inspector of Constabulary, there will be a process – to be set out in secondary legislation – specifying how super-complaints will be dealt with and who will deal with them. It is expected that HMICFRS will work with the College of Policing and the Independent Office for Police Conduct to decide what action should be taken in response to a super-complaint. HMICFRS may decide to undertake inspection activity as a result of a super-complaint.

HMICFRS' proposed inspection framework

Integrated PEEL assessments

Since the establishment of our PEEL assessments, we have been planning to reduce the intensity of inspections of well-performing forces, in order to focus our work on the areas of policing that present the greatest risk to public safety and security.

The purpose of our PEEL inspections is to facilitate improvements to the police service. Integrated inspections will allow us to achieve this more effectively by focusing on those aspects of forces' work which we determine present the greatest risks to the public. Assessing risk in this way will involve greater use of the knowledge that HMICFRS already has about each force, including: information from continuous monitoring; more regular data collection; other evidence collected outside the main inspection fieldwork; and the self-assessments provided by forces in their force management statements.

Until now, PEEL inspections have been carried out at different times during the year. With these reforms, we will carry out PEEL fieldwork once a year in each force. This will involve activity in relation to all three PEEL pillars – efficiency, effectiveness and legitimacy. The resulting judgments and reports will continue to provide regular, easy to understand assessments of police forces. Some changes will be made to the methodology of our inspections, but comparisons with PEEL assessments from previous years will still be possible.

We plan to start inspection fieldwork for integrated PEEL assessments in autumn 2018.

Consultation questions

2. To what extent do you agree with the proposal for a more sophisticated approach to incorporating risk in our PEEL assessments?
3. To what extent do you agree with the proposal that our PEEL assessments should make greater use of information from monitoring and force management statements?
4. What do you see as the greatest opportunities, risks and difficulties as we move towards an integrated PEEL assessment?

Force management statements

Force management statements (FMSs) will be a new source of evidence for the PEEL inspection programme. A number of police forces have been involved in the development of FMSs, which will simplify, strengthen and streamline the information that forces are asked to provide. They will enable HMICFRS to make decisions about which areas of a force's work present the greatest risk, and to design PEEL inspection fieldwork and analysis accordingly. This will mean more focused inspection fieldwork, and, in well-managed forces, less of it.

FMSs will cover, for each of the following four years, the chief constable's evaluation and projections in relation to: (a) the full range of demand (crime and non-crime, latent and patent) which the force is likely to face; (b) the condition, capacity, capability, serviceability, performance and security of supply of the force's workforce and other assets (such as ICT); (c) the force's plans to improve its efficiency; and (d) the force's income.

Every well-managed enterprise, whether it is in the public or private sector, needs this type of information. It follows that, in the production of force management statements, we will not be asking well-managed forces to obtain and provide information that they do not already have. However, the change to a standard and common format is new.

FMSs will also provide local policing bodies – police and crime commissioners and their London and Manchester equivalents – with information of great value about the forces for which they are responsible. They will provide early and detailed warning to local policing bodies in relation to objectives of their police and crime plans that may be at risk, whether in terms of achievement, quality, timeliness or cost. This will provide considerably greater opportunities to take preventative or mitigating action and so protect public safety and enhance police efficiency and effectiveness. In these and other respects, local accountability of forces will be enhanced and made more effective.

The public consultation on FMSs came to an end in December 2017. Consultation responses were received from over 60 persons and bodies and are in the course of evaluation with a view to publishing a template for the first generation of FMSs. Our intention is that forces will provide the first FMSs by the end of May 2018.

Police and crime commissioners' priorities

In the design of each inspection, and before carrying out fieldwork in each force, HMICFRS inspectors examine and review in detail the content of the police and crime plan for that force. The 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 which affect considerations of public protection, crime and disorder, including demand – latent and patent – for police services.

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

College of Policing standards

College of Policing standards are of very great importance to the improvement of policing and the achievement of consistency in practice. HMICFRS always takes the College of Policing standards, where they exist, into account in its design of inspections and its assessments of forces.

Methodology, monitoring, assurance and analysis

HMICFRS' monitoring process

HM Inspectors of Constabulary (HMIs) routinely monitor all police forces in order 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 police and crime commissioner or local policing body, so that they can take action.

We are continuing to improve the monitoring process to reflect the developing PEEL programme and to make better use of HMICFRS' insights into police performance and the differing contexts in which services are provided. This will include improving the integration of monitoring with our new approach to PEEL assessments. For more information about HMICFRS' approach to monitoring, please visit our website at:

www.justiceinspectorates.gov.uk/hmicfrs/about-us/what-we-do/our-approach-to-monitoring-forces/

Follow-up from previous inspections

HMICFRS conducts a number of follow-up activities throughout the year. They range from formal revisits (for instance, as part of the child protection inspection programme, or aspects of our PEEL programme) to offering support to forces in responding to our findings (for instance, in the custody inspection programme). Also, we track the progress that forces have made against our report recommendations.

HMICFRS' knowledge, information and digital strategy

HMICFRS uses a significant amount of data and information from a wide range of sources. In 2017/18, these will include force management statements and Home Office data, as well as formal requests for data that are used to inform inspections.

We will continue to ensure we are managing this information effectively, re-using and exploiting it where we can, so that it remains sufficiently protected. This will require a mix of new processes and tools, and better use of existing systems.

Data management

HMICFRS has worked with the London School of Economics to develop a statistical software model that can predict the demand for police services with appreciable degrees of accuracy, particularly in relation to reactive demand. It shows which neighbourhood areas face the greatest problems and provides forces with new information to assess where further improvements can be made. This information is being made available to forces.

Response and neighbourhood policing ‘big data’ project

HMICFRS has been working, with the support of 18 forces as well as the National Police Chiefs’ Council, to develop better ways to collect, analyse and report information. Rather than use traditional data collection forms, which can be labour-intensive to complete and slow to process, this project has used a ‘big data’ approach, with forces submitting raw data extracted from their command and control systems.

For each incident, data are collected on the type of incident, when and where it occurred, how it was reported and how it was responded to. In total, more than 12 million records of incidents have now been submitted by 18 forces. These data have been analysed to provide insight into matters such as:

- How well do forces cope with peaks in demand?
- How do forces differ in the way they prioritise and respond to different types of incident?
- How efficiently are resources managed – for example, how often are lone officers used to provide an initial response; and how long do different forces typically spend dealing with incidents such as missing people, traffic disruption or alarm calls?

After a successful initial pilot exercise in 2016, which used a desktop-based system, a cloud-based solution has been developed that allows forces to upload their data directly to a secure facility, which then processes the data overnight. We are now developing and testing a range of interactive web-based reports for forces and for HMICFRS inspectors to explore and evaluate a wide range of data.

HMICFRS’ assurance obligations

In addition to the statutory obligations to inspect police forces and certain other bodies, HMICFRS is obliged to 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 statutory code of practice⁵, and the Strategic Policing Requirement⁶.

⁵ *Code of Practice on the Operation and Use of the Police National Database* (made by the Secretary of State for the Home Department in March 2010), presented to Parliament pursuant to section 39A of the Police Act 1996. Available from: www.gov.uk/government/publications/code-of-practice-on-the-operation-and-use-of-the-police-national-database

⁶ *Strategic Policing Requirement*, Home Office, March 2015, paragraph 1.11. Available from: www.gov.uk/government/uploads/system/uploads/attachment_data/file/417116/The_Strategic_Policing_Requirement.pdf

We continue to conduct monthly reviews at force level to monitor statistics relating to the usage of the Police National Computer. In 2018/19 we will also undertake work to assess how police forces discharge their obligations to have regard to the Strategic Policing Requirement. This work includes our counter-terrorism inspections, our thematic inspection of cyber-crime and our child protection rolling inspection programmes.

Advisory and reference groups

HMICFRS regularly convenes 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.

HMICFRS' group members are drawn from a wide range of relevant organisations, including several different universities, the National Police Chiefs' Council, the Association of Police and Crime Commissioners and the College of Policing.

The HMICFRS Technical Advisory Group (TAG) helps to design inspection programmes, to ensure 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 College of Policing, the Home Office, the Office for National Statistics, staff associations, police forces and other specialist agencies.

HMICFRS also has other programme-specific reference groups covering, for example, each of the PEEL strands of work and inspections, such as child protection and crime data integrity.

Consultation questions

1. Do the proposed thematic inspections of counter-terrorism, fraud and cyber-fraud, older people in the criminal justice system, cyber-crime, child protection and crime data integrity cover areas that are of most concern to you at the moment?
2. To what extent do you agree with the proposal for a more sophisticated approach to incorporating risk in our PEEL assessments?
3. To what extent do you agree with the proposal that our PEEL assessments should make greater use of information from monitoring and force management statements?
4. What do you see as the greatest opportunities, risks and difficulties as we move towards an integrated PEEL assessment?

How to respond to this consultation

Please submit your answers to these questions, together with any other comments, by email to: HMICFRSpolicinginspectionprogramme@hmic.gsi.gov.uk, no later than 1700 on 19 February 2018.

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' approach to consultation, you can email this to: HMICFRSpolicinginspectionprogramme@hmic.gsi.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' website at:
www.justiceinspectorates.gov.uk/hmicfrs/about-us/what-we-do/inspection-programmes/

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.