

HMIC's programme for regular force inspections

Introduction

On 1 July 2014 HM Inspectorate of Constabulary (HMIC) launched a consultation in relation to its new approach to assessing police force performance in England and Wales. This new programme of inspections, or PEEL (police efficiency, effectiveness and legitimacy) assessments, aims to assess how well each of the 43 forces in England and Wales provides value for money, cuts crime and provides a service that is fair and treats people properly.

Office of the Police and Crime Commissioner for Surrey response

Q1. What do you think of the proposed approach?

During his election campaign, the Police and Crime Commissioner for Surrey, Kevin Hurley, made six promises to the people of Surrey. These were to:

- take a Zero Tolerance policing approach;
- ensure more visible street policing;
- put victims at the centre of the Criminal Justice System;
- give residents the opportunity to have a greater say in how their streets are policed;
- protect local policing;
- be uncompromising in the standards residents expect from their police.

Since being elected, these commitments form the basis of the Police & Crime Plan as the 'People's Priorities', setting the strategic direction for Surrey Police and partners in Criminal Justice and community safety.

Through the democratic process residents have therefore articulated a clear vision for Policing in Surrey, and the Commissioner is of the view that the proposed inspections should give Surrey residents an easy-to-understand assessment of how *their* force is performing against *their* expectations. The Commissioner is concerned that HMIC's proposed approach is at odds with this and places too greater emphasis on comparing and ranking forces nationally.

That said, the Commissioner does support the use of a primarily qualitative methodology and would hope that any quantitative data is properly contextualised to prevent misinterpretation. It is also hoped that reporting is balanced, reflecting both positive and negative findings.

Q2. Are there any other aspects of police work you would like to see covered by PEEL inspections? If so, what are these?

The consultation document notes that the assessment framework will be extended to provide more rounded assessments beyond the 16 proposed questions, and that the training afforded to officers and staff will be considered as part of this. This is supported.

The Commissioner is of the view that the PEEL inspections would also provide a good opportunity to assess the services provided by the College of Policing / NCALT and whether they are meeting the needs of forces.

Q3. Do you agree with the proposal to use four categories for making judgements? If not, how could it be improved?

The Commissioner is firmly of the view that it is not the role of HMIC to make judgements and that this responsibility rests with the relevant local policing body. The role of HMIC should be to *inform* these judgements through the provision of information and data.

However, putting that aside, it is felt that the four judgements proposed are too broad and create a performance knife-edge between the “good” and “requires improvement” ratings. The Commissioner is concerned that such an approach will not truly benefit the public’s understanding of Police performance and is more likely to prompt alarmist or sensationalist reporting in the media.

For example, the consultation document states that a “requires improvement” rating might lead to a force being placed under formal review, but not always. This clearly demonstrates that the category itself is too broad and that there is a need for an additional “satisfactory” category.

The Commissioner is greatly concerned that the current categories for making judgements could unfairly and unduly undermine the public’s sense of safety and confidence in their police force.

Q4. Do you agree with the proposed approach to those forces that receive a judgement of inadequate? How could it be improved?

Again, the Commissioner is firmly of the view that it is not the role of HMIC to make judgements and that this responsibility rests with the relevant local policing body. The role of HMIC should be to *inform* these judgements through the provision of information and data.

Q5. Is there anything else that we should include in our recommendations to ensure that they lead to improvement?

It is vitally important that HMIC consider the budgetary and resourcing implications of its recommendations. The Commissioner would ask that when HMIC make recommendations it assesses potential cost and staffing implications in the context of the current financial climate, indicating how resources and finances could be better allocated to allow for implementation.



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

The consultation document notes that collaboration arrangements may provide greater benefits to some forces than others, and the Commissioner would urge HMIC to highlight areas where existing arrangements may no longer be in the best interest of a force or unlikely to provide the required benefits or savings.

Q7. Do you have any comments on our proposed approach to gathering evidence?

The Commissioner is pleased that HMIC acknowledge the need to minimise the impact of inspections on forces, and generally supports the proposals in the consultation document to reduce the demands placed on officers and staff. This is of particular relevance in Surrey where much work is undertaken collaboratively with Sussex.

One area of concern relates to unannounced inspections. Whilst the Commissioner acknowledges that this reduces the need for preparatory work by the force, he would like assurances that forces won't subsequently be penalised if a key individual isn't available on the day of inspection.

Q8. Do you have any comments on our proposed approach to gathering information from victims?

The proposed approach seems appropriate.

Q9. What else should we consider doing to make the PEEL assessments as fair as they can be?

It is vitally important that the moderation process detailed in the consultation document is challengeable and that any informal feedback provided by HMIC inspectors as part of a 'hot debrief' accurately reflects the final content of the report.

Q10. Do you have any comments on our proposed approach to reporting to the public?

As detailed in the response to Question 3, the Commissioner has serious concerns around the use of four judgement categories. There is a real danger that this blunt approach will lead to sensationalist reporting of HMIC findings, with some forces likely to be unfairly undermined in the eyes of the public as a result.

These concerns are strengthened by paragraph 56 of the consultation document, which states that one of the documents HMIC intends to produce for the public will be a report summarising the principal deficiencies across all forces. It is the Commissioner's view that a document that focusses exclusively on failure is of little use to anyone beyond those looking for an opportunity to discredit the police, and any summary document should also celebrate the principal successes across all forces.

