

# Inspection of the performance of Home Office police forces

HMICFRS's approach to inspection, including  
monitoring, force insight, inspection design and  
fieldwork

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## Purpose

1. This document explains the principal policies and procedures of HM inspectors of constabulary in relation to their principal functions of inspecting and reporting on the efficiency and effectiveness of every police force maintained for a police area and the British Transport Police. It does not deal with the inspection of the National Crime Agency or police forces not under the jurisdiction of the Home Secretary, or the investigation of super-complaints.
2. It is intended as a guide, not a commitment to proceed as stated in every respect. The inspectors of constabulary reserve the right to vary or depart from what is in this document if they judge that to be necessary or expedient in an individual case. In addition, the policies and procedures described in this document are kept under constant review, and may be changed at any time.
3. To make it easier to read and use, at the back there is a list of definitions of terms used in this document.

## Background

### **HM inspectors of constabulary**

#### *Establishment in 1856*

4. The inspectors of constabulary were established by the County and Borough Police Act 1856. Their modern legislative basis is the Police Act 1996, most recently amended by the Police Reform and Social Responsibility Act 2011, the Crime and Courts Act 2013 and the Policing and Crime Act 2017.

## *Terminology*

5. In this document, the term "inspector of constabulary" and "HMI" refers only to HM inspectors of constabulary appointed under the Police Act 1996, section 54. Police forces and others sometimes refer to the staff of the inspectorate as "inspectors", and they are. But only the six individuals appointed by the Crown under section 54 are the inspectors of constabulary.

## *Statutory purpose: efficiency and effectiveness*

6. The principal statutory purpose of the inspectors of constabulary has not changed in any material respect since 1856. It is to inspect and report on the efficiency and effectiveness of police forces in England and Wales.
7. The section 54 formulation means that there is no aspect of policing by police forces which is outside the jurisdiction of the inspectors of constabulary. That jurisdiction covers everything from low-level anti-social behaviour to serious sexual offences, offences against the vulnerable, serious violence, homicide, organised crime and terrorism, as well as requirements placed on the police in respect of matters not involving crime and disorder, such as the protection of vulnerable people (for example, people with poor mental health).
8. However, in cases of complaints against individual police officers or groups of police officers, the Independent Office for Police Conduct has jurisdiction. The IOPC and HMICFRS have established a concordat which sets out how they will co-operate, in compliance with their statutory duties to do so<sup>1</sup>. Even though the IOPC deals with complaints against individuals, the HMIs are concerned with misconduct in two important respects. First, they are concerned where misconduct of officers discloses the possibility of systemic failures in a force, for example where officers are engaging in predatory behaviour towards victims of crime for the sexual advantage of the officers in question. Second, they are involved where a senior officer is accused of

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<sup>1</sup> Police Act 1996, section 54(2D)

misconduct. In those circumstances, HMCIC or an HMI nominated by him must sit on the misconduct panel<sup>2</sup>.

9. Inspections are primarily concerned with operational policing, specifically how efficiently and effectively it is being carried out. Inspection reports form a major – although not the only – source of information available to local policing bodies for the purposes of the discharge of their obligations to hold their chief constable to account. In this respect, see further paragraphs 56, 60, 108, 111, 117 and 123.
10. Inspections are not confined to the extent to which a chief constable has regard to the relevant police and crime plan of his local policing body. The police and crime plan is a relevant and material consideration in an HMI's determination of the efficiency and effectiveness of the force, but it is not the only one. The remit of the HMIs under the section 54 of the Police Act 1996 was not reduced or limited when local policing bodies were created by the Police Reform and Social Responsibility Act 2011.
11. Nor do the HMIs report to local policing bodies, even when a local policing body has commissioned the inspection under section 54(2BA) of the Police Act 1996. They report to the public by virtue of their obligation to publish all inspection reports under section 55 of the Police Act 1996. Whilst local policing bodies obtain much value from inspection reports, it is a misapprehension to regard the inspectors of constabulary as akin to auditors acting for local policing bodies.
12. Paragraphs 135 *et seq* contain more information about inspections.

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<sup>2</sup> Regulation 26, Police (Conduct) Regulations 2012



### *Crown appointments*

13. The inspectors of constabulary are appointed by the Queen on the advice of the Home Secretary and with the consent of the Treasury<sup>3</sup>. One of them may be appointed as the chief inspector of constabulary.
14. As Crown appointees, the inspectors of constabulary are not civil servants, and so are not employees. They are holders of statutory offices. They may be dismissed by the Crown on narrow grounds.

### *Regional and national areas of responsibility*

15. The inspectors of constabulary have both regional areas of responsibility – that is, responsibility for particular forces – and national areas of responsibility. The chief inspector of constabulary has responsibility for the inspection and other activities of the inspectorate in relation to all forces.
16. The national responsibilities of the inspectors of constabulary concern mainly:
  - (a) their roles as members of the inspectorate board, which is concerned with the overall policy and practices of the inspectorate<sup>4</sup>;
  - (b) their roles as senior responsible officers for inspections of a national character, such as thematic inspections and joint inspections, and for particular parts of the PEEL programme; the PEEL programme is described further in paragraphs 145 *et seq*;
  - (c) their membership of the national moderation panels which are established to ensure consistency and fairness in the judgments made about the performance of forces<sup>5</sup>;

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<sup>3</sup> Police Act 1996, section 54(1)

<sup>4</sup> See paragraphs 17 - 23, 171 - 179 and 183 in relation to the inspectorate's board.

<sup>5</sup> See paragraph 234 *et seq* for more information about the moderation process

- (d) their roles leading work concerning the internal development of the processes of the inspectorate and their efficient operation; for example, the Workforce Development Group (chaired by the chief operating officer) which is concerned with the skills of the inspectorate's staff, the Inspection Development Group (chaired by one of the HMIs), which is concerned with inspection design and connected matters, the Inspection Management Group (chaired by the chief operating officer) which is concerned with the resourcing of inspections and connected matters, and the HMICFRS Monitoring Group (chaired by one of the HMIs); see paragraphs 23, 85 - 134 and 172 - 174 for more information about these groups;
  
- (e) their representation of the inspectorate in other *fora*, for example the Senior Steering Group convened by the Home Office to consider the police service's contribution to the Government spending review, the Home Office committees concerned with national honours, and the Police Reform and Transformation Board, chaired by one of the local policing bodies.

### *Inspectorate Board*

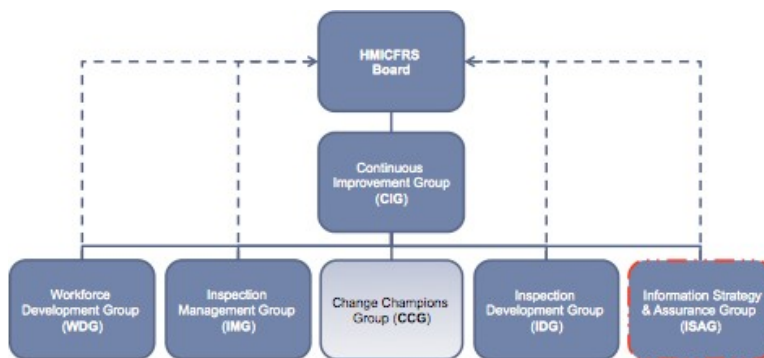
- 17. The inspectorate operates, at its highest level, through a mechanism called the Board. This is a collective-decision making arrangement for the convenient and efficient conduct of the affairs of the inspectorate. Although called a board, it has neither legal existence nor legal authority. It resembles a board inasmuch as it is composed of the most senior people in the inspectorate. In reality, it is not a board in any conventional sense.
  
- 18. The inspectorate Board is composed of the chief inspector of constabulary as its chairman, the other inspectors of constabulary and the inspectorate's chief operating officer, who is a senior civil servant.

19. The Board meets at least ten times a year. It reaches decisions by consensus, not vote. If consensus is not reached, the chairman makes the final decision.
  
20. The remit of the Board is to deal with matters of the greatest importance in the affairs of the inspectorate, including securing the long-term success of its inspection programme and establishing, promoting and protecting the culture and values of the inspectorate. In these respects, the board:
  - (a) is required to protect the independence of the inspectorate;
  - (b) establishes the inspectorate's priorities;
  - (c) establishes and oversees the implementation of the annual inspection programme and framework as well as commissioned and *ad hoc* inspections;
  - (d) decides other matters of the highest importance, including those involving significant risk and financial expenditures and the nature and conduct of the inspectorate's relations with external bodies, including political entities;
  - (e) establishes and disseminates to its staff the inspectorate's long-term objectives;
  - (f) maintains oversight of financial arrangements and value for money, and of matters concerning the welfare of inspectorate staff and the efficiency and effectiveness of their deployment and productivity;
  - (g) maintains oversight of significant inspection activity, including risks, issues, potential and actual resource implications, learning from experience and inspection findings; and

(h) maintains oversight and provides assurance that work on the development of the ways in which the inspectorate works is progressing as it should.

21. Committees of the Board are established from time to time, and operate under schemes of delegation given to them by the Board. The chairs of the committees of the Board, and other groups established by the Board for particular purposes, are required to keep the Board informed in a timely manner as to the principal matters delegated to them.

22. The following diagram shows the principal committees and sub-groups operating under the Board:



23. The two groups which are predominantly concerned with the outward-facing functions of the inspectorate are the Inspection Management Group (IMG) and the Inspection Development Group (IDG). The other groups are concerned more with the efficiency of operation of the inspectorate, and are predominantly inward-looking.

24. Paragraphs 172 - 173 deal further with the work of the IMG and the IDG.

### *Inspectorate staff*

25. The staff of the inspectorate is made up largely of civil servants on permanent assignment to the inspectorate or on detached duty from government departments, police officers and police staff seconded from police forces, and

other people from other parts of law enforcement (such as Border Force and the National Crime Agency)<sup>6</sup>. Seconded police officers and police staff are often specialists in particular areas of policing, such as counter-terrorism, organised crime, child protection and sexual offences.

26. The inspectorate has a full-time complement of over 30 analysts who are responsible for the assessment and statistical and other analyses of information which is used in inspection design and the understanding of inspection findings. They also play an important role in the monitoring of forces, establishing which forces are mainstream and which are outliers in performance.
27. The inspectorate also maintains a register of associates, who are specialists in particular fields and who can be called upon to participate in inspections or assist the inspectorate in other ways.
28. The pool of associates also includes a number of specialist editors, who work on the inspectorate's reports.
29. During their period at the inspectorate, the seconded and associate staff owe their loyalty to the inspectors of constabulary. Their duties of confidentiality in respect of information acquired during their time at the inspectorate are enduring. Only the inspectors of constabulary have authority to make final inspection decisions about the efficiency and effectiveness of police forces. This matter is dealt with in more detail in paragraphs 213 *et seq.*
30. For each geographical region of the inspectorate's operations, the inspector of constabulary has a chief of staff. All chiefs of staff are currently police officers or other law enforcement professionals, serving or retired. Their responsibility is the oversight of all inspections in their regions, including co-ordination of inspections taking place at the same times, the leadership and

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<sup>6</sup> Since the inspectorate took on functions in relation to fire and rescue services, its staff also include people from fire and rescue authorities.

co-ordination of force liaison leads (see below) and inspection officers (see below). They are also responsible for the management of the relationships of the inspectorate with the forces and local policing bodies in their regions.

31. Within each region, there is a force liaison lead (FLL) for, usually, every two forces. The exception is the Metropolitan Police where there are two FLLs for one force. FLLs are the inspectorate's lead experts on their individual forces. In the PEEL programme, they lead the inspections of those forces, design the detail of the fieldwork, keep up to date on developments within their forces, and write the major part of the relevant report.
32. Each FLL normally has an inspection officer, who is his or her right-hand, and also maintains an enduring and close knowledge of the affairs of the force in question. The inspection officer takes a prominent role in the carrying out of the inspection, supervising inspection staff from the inspectorate's pool of inspection staff, chosen according to their expertise and experience and the nature of the inspection.
33. In contrast to the chiefs of staff, FLLs and regional inspection officers, who develop and maintain regional and local expertise, other inspection staff are specialists in particular areas of policing. Examples include counter-terrorism; crime data integrity; stalking and harassment; child protection; and custody. These small teams of inspection leads (sometimes called assistant portfolio directors) and inspection officers are responsible for all inspection activity related to their specialist areas of policing. This includes developing the inspection, completing it (sometimes with support from regional staff), writing and publishing the resulting report or reports, and follow-up work with forces and national leads to help ensure recommendations are progressed. They are also HMICFRS's resident experts in these areas, charged with building understanding and knowledge of their specialist areas across the organisation, and with maintaining good relationships with the relevant NPCC and Home Office leads.

### *Inspection programme and framework*

34. The chief inspector of constabulary is required<sup>7</sup> from time to time to prepare and consult on an inspection programme and framework setting out what inspections the inspectors of constabulary propose to carry out and the manner in which they propose to carry out their functions of inspecting and reporting.
35. Following amendments made by the Police Reform and Social Responsibility Act 2011 to the Police Act 1996, the chief inspector of constabulary is required to obtain the approval of the Home Secretary to the inspectorate's annual inspection programme and framework<sup>8</sup>. The Home Secretary may by statutory instrument specify matters to which the chief inspector of constabulary must have regard in preparing his inspection programme and framework, including in connection with matters of national importance<sup>9</sup>. To date, no such statutory instrument has been made.
36. After obtaining the approval of the Home Secretary, he is required to lay the inspection programme and framework before Parliament and to publish it.
37. Although the statute does not specify how frequently an inspection programme and framework must be established, the practice of the chief inspector of constabulary has been to do this annually, to coincide with the inspectorate's annual financial settlement from the Home Office.

### *Reports to be published*

38. The Police Reform and Social Responsibility Act 2011 removed the obligation of the inspectors of constabulary to report to the Home Secretary. Now, the

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<sup>7</sup> Police Act 1996, Schedule 4A, paragraph 2(1)

<sup>8</sup> Police Act 1996, Schedule 4A, paragraph 2(2B)

<sup>9</sup> Police Act 1996, Schedule 4A, paragraphs 2(4A)-(4C)

inspectors of constabulary are required to publish their reports, with exceptions in respect of national security and personal safety<sup>10</sup>.

39. The inspectors of constabulary do not report to local policing bodies, chief constables or anyone else. Publication – to the world at large – is the requirement.

#### *Commissions from Home Secretary*

40. In addition to the inspections provided for in the inspection programme and framework, the inspectors of constabulary may also be commissioned by the Home Secretary to carry out additional inspections<sup>11</sup>. In such cases, they cannot refuse, although in most cases additional funding is required from the Home Office.

#### *Commissions from local policing bodies*

41. Local policing bodies may also commission inspections from the inspectors of constabulary<sup>12</sup>. In such cases, the local policing body must pay the costs of the inspection. Unlike the case where the Home Secretary commissions an additional inspection, in the case of a local policing body the inspectors of constabulary have the right to refuse the commission. Since the establishment of local policing bodies under the 2011 Act, there have been few commissions from local policing bodies.
42. In the case of the inspectors of constabulary receiving and accepting a commission from a local policing body under section 54(2BA) of the Police Act 1996, the resulting report is not a report to the local policing body, and the report must be published as must any other report.

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<sup>10</sup> Police Act 1996, section 55; this applies to reports about the efficiency and effectiveness of Home Office police forces; reports to the Chancellor of the Exchequer and the Secretaries of State for Defence, Transport and Energy and Climate Change are made to those Ministers.

<sup>11</sup> Police Act 1996, section 54(2B)

<sup>12</sup> Police Act 1996, section 54(2BA) and (2BB)



### *Other inspections*

43. The chief inspector of constabulary or, at the request of the chief inspector, any other inspector of constabulary may also carry out inspections which are not included in an approved inspection programme and framework and have not been required by the Home Secretary or requested by a local policing body. Before doing so, the chief inspector of constabulary must first consult the Home Secretary and the local policing body in question, but he does not need the approval of either<sup>13</sup>.

### *Further duties*

44. The Home Secretary has the right also to direct the inspectors of constabulary to carry out such other duties for the purpose of furthering police efficiency and effectiveness as the Home Secretary may specify<sup>14</sup>.
45. When local policing bodies apply<sup>15</sup> to the Home Secretary for special grant funding for extraordinary expenditure (for operations such as major or critical incidents, terrorist attacks and the Grenfell Tower fire), the inspectors of constabulary review the applications and advise the Home Secretary on them.

### *No separate legal personality*

46. The inspectorate has no separate legal personality. It is a term of reference of convenience, and refers to the inspectors of constabulary collectively and their staff. It follows that the inspectorate may not sue or be sued. Any legal action would be taken by or against one or more of the inspectors of constabulary; in matters concerning the inspectorate as a whole, the action

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<sup>13</sup> Police Act 1996, Schedule 4A, paragraph 2(6) and (7)

<sup>14</sup> Police Act 1996, section 54(3)

<sup>15</sup> Under Police Act 1996, section 48; the Local Government Act 2003, section 31; or the Criminal Justice and Public Order Act 1994, section 170

would most probably be taken by or against the chief inspector of constabulary or the Home Secretary.

47. Unlike local policing bodies<sup>16</sup> and chief constables<sup>17</sup>, the inspectors of constabulary are not corporations sole.

#### *Funding from Government and others*

48. The inspectorate receives an annual funding settlement from the Home Office. That is made by way of a budget delegation from the permanent secretary at the Home Office to the chief inspector of constabulary. The permanent secretary is the Accounting Officer; the chief inspector of constabulary is not. This also means that the inspectorate must adhere to the procurement and human resources policies and practices of the Home Office.
49. The inspectorate also receives funding from other Government departments and others for its work inspecting the National Crime Agency, the police forces of the armed forces and the Ministry of Defence Police, the Police Service of Northern Ireland, the British Transport Police, the Civil Nuclear Constabulary and certain overseas police forces. It also receives funding from the Treasury for its work on HMRC.

#### *Independence*

50. In the administrative considerations referred to in paragraphs 34, 35, 40, 44 and 48 therefore, the inspectors of constabulary are not independent.
51. Their substantive independence is in the judgments they make as to the efficiency and effectiveness of police forces, in other words in respect of the content of their reports.

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<sup>16</sup> Police Reform and Social Responsibility Act 2011, section 1(2)

<sup>17</sup> Police Reform and Social Responsibility Act 2011, Schedule 2, paragraph 2

52. The legal source of that independence is by virtue of:
- (a) the absence of any political criteria in legislation under which the inspectors of constabulary operate which require the inspectors of constabulary to have regard, or not to have regard, to particular matters when conducting their inspections and producing their reports; in particular, unlike economic regulators, there is no statutory requirement for the inspectors of constabulary to take into account guidance from a Minister<sup>18</sup>;
  - (b) the absence of any power of direction in the hands of any person or institution – political or otherwise – in respect of the content of inspection reports or any other judgment or determination made by the inspectors of constabulary;
  - (c) the fact that the inspectors of constabulary are not civil servants or employees of any Government department, police force or any other person; instead, they are Crown servants;
  - (d) the lengths of their tenures; and
  - (e) the fact that they may be dismissed by the Crown, on the advice of the Home Secretary, on narrow grounds none of which concerns matters of a political nature.
53. The independence of the inspectors of constabulary from political bodies and the police is important in relation to the respect and confidence which the public and others should have in the objectivity of their reports.

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<sup>18</sup> Other than a specification made by the Home Secretary as to the matters to which the chief inspector of constabulary must have regard in preparing an inspection programme or an inspection framework; Police Act 1996, Schedule 4A, paragraph 2(4A)

### *The nature of inspection*

54. Inspection reports are just that; reports on the findings of the inspectors of constabulary on the efficiency and effectiveness of police forces. They usually contain recommendations, and most recommendations are made to the police forces in question. From time to time, recommendations are also made to the Home Secretary, the Welsh Government, the College of Policing, local policing bodies and others. Paragraphs 135 *et seq* explain the inspection regime in some detail.

### *Inspectors, not regulators*

55. The inspectors of constabulary are not regulators, although the processes of inspection and analysis have considerable similarities with those of regulators. The principal difference lies in their powers. Regulators have hard power: the power of intervention, direction and enforcement. Inspectorates have soft power: the power of their voice and the authority with which it is used. The only hard power which the inspectors of constabulary have is the power to require the provision of information and access to police premises for the purposes of inspection<sup>19</sup>, and the chief inspector of constabulary's power to initiate sanctions for failures in that respect<sup>20</sup>.
56. Recommendations in inspection reports are not orders. It is for others – principally chief constables and local policing bodies – to act on them. If those with the power to act fail to do so, the inspectors of constabulary have no power to compel compliance. Their only power is to criticise that failure (including by escalating the matter through the Policing Performance Oversight Group<sup>21</sup>(formerly called the Crime and Policing Monitoring Group)), and inspect and report again. This is the principal difference between an inspectorate and a regulator.

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<sup>19</sup> Police Act 1996, Schedule 4A, paragraphs 6A and 6B

<sup>20</sup> Police Act 1996, Schedule 4A, paragraph 6C

<sup>21</sup> As to which, see paragraphs 114 *et seq*

### *Response to inspection reports*

57. After each inspection report has been published, the local policing body in question must invite the chief constable to comment on the inspection report and then publish those comments, and the local policing body's own comments (including the local policing body's response to the chief constable's comments) on the report<sup>22</sup>. This must be done within 56 days of the publication of the report<sup>23</sup>.
58. In the case of recommendations in an inspection report, the local policing body's published comments must include an explanation of the action which the local policing body has taken or proposes to take in response to the recommendations, or why the local policing body has not taken, or does not propose to take, any action in response<sup>24</sup>.
59. The local policing body's comments and explanations must also be sent to the inspectors of constabulary and the Home Secretary<sup>25</sup>.

### *Information available to local policing bodies*

60. Local policing bodies receive from the inspectorate a great deal of the information they need to discharge their obligations of holding the chief constable to account, setting local priorities and the police budget. As explained above, it is up to them what they do with that information, and they are free to obtain information and analysis in relation to the efficiency and effectiveness of their forces from any other sources they see fit. And it is for

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<sup>22</sup> Police Act 1996, section 55(4) and (5)

<sup>23</sup> Police Act 1996, section 55(5A)

<sup>24</sup> Police Act 1996, section 55(5B)

<sup>25</sup> Police Act 1996, section 55(6)

them, not the inspectorate, to decide how they will hold the chief constable to account.

61. The inspectors of constabulary do not hold local policing bodies to account. That is the role of the electorate and the courts.

## **All-force continuous monitoring**

### *General*

62. In order properly to inform their decisions about what inspections are necessary, and to ensure they maintain a sound view of the performance of forces, the inspectors of constabulary operate a continuous monitoring process. Monitoring applies to all forces. It is consistent with the principal statutory remit of the inspectors of constabulary under section 54(2) of the Police Act 1996 to "inspect and report on the efficiency and effectiveness of every police force maintained for a police area".
63. All forces are either in the Scan phase of the inspectorate's monitoring regime, or the Engage phase. The Scan phase is concerned with the collection and analysis of data and information about forces' performance; it is a continuous process. The Engage phase is concerned with the provision of enhanced support to forces where their performance merits it. Scan and Engage are explained in more details in paragraphs 63, 86 - 91, 97 - 119, 121 and 130 - 133.
64. Whilst in-force inspections are scheduled, and are the times when forces see inspectorate staff on site, the work of the inspectorate in relation to each force is continuous.

### *Information sources*

65. The inspectors of constabulary obtain information about police forces in seven principal ways:
- (a) in the police and crime plan in respect of each force, to enable them to understand the priorities of the local policing body;
  - (b) through in-force inspections (otherwise referred to as fieldwork), and the work which forces do to prepare for in-force inspections;
  - (c) through regular monitoring of and liaison with forces, primarily through the inspectorate's force liaison staff and the contacts maintained by inspectors of constabulary and force liaison leads with chief officers, local policing bodies and others;
  - (d) through the formal provision of information and documents requested of forces for the purposes of inspection (including their data returns to the inspectorate and their force management statements)<sup>26</sup>;
  - (e) from their annual data returns to the Home Office;
  - (f) from information provided by forces to the Chartered Institute of Public Finance and Accountancy in relation to the costs of individual and specific police functions such as investigations, call-handling, response and corporate support;
  - (g) from information and intelligence available from sources outside policing, including in media reports, reports of proceedings in Parliament and local institutions, other regulatory bodies or inspectorates concerned with safeguarding and the prevention of crime and disorder or their consequences, academic bodies, public policy institutions (such

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<sup>26</sup> In this respect, see further paragraphs 163 - 169.

as think tanks) and commentators, and official publications such as the Crime Survey of England and Wales.

*Value for money profiles*

66. Every year since 2009, the inspectorate has produced and published a value for money profile for each force.
67. Every profile contains a set of comprehensive information about:
  - (a) the force's overall expenditure according to personnel (police officers, police staff, and police community and support officers), and non-staff costs (land and buildings, vehicles, ICT, forensics, equipment, horses, dogs, aircraft and professional services);
  - (b) the force's income from central government grant, council tax and reserves, and private sources for services such as policing sporting events, and how that funding has changed over time;
  - (c) the force's costs of individual, specific policing functions such as call-handling, response, investigation, neighbourhood policing, serious and organised crime, public order and corporate functions (sometimes known as back-office functions);
  - (d) the composition of the workforce according to numbers of police officers (including their ranks) and other personnel, their spans of control and responsibility, length of service, sickness rates and turnover;
  - (e) the volumes of crime, classified according to type, such as homicide, violence with injury, violence without injury, rape, other sexual offences, robbery, burglary, vehicle offences, shoplifting, theft from a person, bicycle theft, shoplifting and other theft offences, criminal damage and arson, drug trafficking, possession of drugs, possession of weapons, public order offences and other crimes against society;



- (f) the results of police action, for example offences charged, out-of-court disposals (such as cannabis warnings), and offences taken into consideration; and
  - (g) circumstances in which no police action is taken, for example because of evidential difficulties (such as a decision of the complainant not to cooperate), and determinations by the Crown Prosecution Service that a prosecution is not in the public interest.
68. The principal purpose of the profile is the presentation of information which permits the inspectorate and others to make comparisons. The comparisons, in the main, are made according to the relevant costs or other numbers per 1,000 of the force area's resident population.
69. The comparisons are made between comparator forces which are members of the most similar group (MSG) of forces. MSGs are groups of forces that have been found to be the most similar to each other using statistical methods based on demographic, economic and social characteristics which relate to crime. Areas which have similar demographic, social and economic characteristics will generally have reasonably comparable levels of crime. So, for example, in the case of the Metropolitan Police, the comparator forces (i.e. members of the relevant MSG) are Greater Manchester Police, West Midlands Police and West Yorkshire Police. Similarly, Norfolk Constabulary's MSG members are Suffolk, North Wales, North Yorkshire, West Mercia, Devon and Cornwall, Lincolnshire and Wiltshire. Bedfordshire's MSG includes Leicestershire, Nottinghamshire, Hertfordshire, Kent, Hampshire, Essex and South Yorkshire.
70. In other words, the comparisons are made so that like cases are treated alike.
71. Making comparisons in this way provides the best indicators of where and to what extent forces deviate from the MSG in the relevant respects (i.e. costs, funding, workforce, crimes and outcomes).

72. In the case of costs, the comparisons are between the costs of specific functions in an individual force as compared with the costs of the same functions in MSG comparator forces. In the case of volumes of crime, the comparison is either between the numbers of crimes (according to crime-type) per 1,000 population in one force against others, or the total crimes (according to crime-type) across all forces in the MSG, per 1,000 population in all forces in the MSG.
73. Making valid like-for-like comparisons in this way enables the inspectorate to assess the scale of differences between forces' relative efficiency and effectiveness, and to direct inspection activity and analysis appropriately.

### *PowerBi*

74. The inspectorate uses PowerBI, Microsoft's suite of business analytics tools, to analyse data and establish insights. Data and information is drawn together from a range of sources, including forces' data returns to the inspectorate; data and information provided to other bodies, such as the Home Office, the Chartered Institute of Public Finance and Accountancy and the Ministry of Justice; and other information such as recommendations made by the inspectorate. Analysing and visualising this information through PowerBI dashboards allows the inspectorate to provide a high-level overview of performance (for example, the change over time in overall crime rates or to gain insight into the levels and changes in specific crime types such as harassment and violence with injury). These tools also provide the ability to interactively dig down into detailed areas of performance and explore a wide range of questions. Some of our PowerBI dashboards, such as the Rape Monitoring Group interactive data dashboard and the value for money profiles, are made available to the public through the inspectorate's website. Others, such as the Integrated Peel Assessment and Incident and Response dashboards, are made available to all police forces via a password-protected portal, so that they can benchmark their own performance without investing resource in similar analysis and technology. PowerBI dashboards are used

by the inspectorate to support a range of inspection activities, including providing evidence to inform the establishment of key lines of enquiry in the design of inspections, and to provide insight into force performance in the continuous monitoring process.

### *Use of information*

75. The information from the sources referred to in paragraphs 65 - 74 is used to make judgments about the risks which forces face, and so determine the extent to which forces require in-force inspections in the future and what the nature and extent of those inspections should be. It is primarily the job of the inspectorate's analysts to work through much of this information and, with FLLs and others, to brief the inspectors of constabulary.
76. The information is also used to determine which forces' performance is of sufficient concern as to warrant escalation in the monitoring process, as explained below.

## **Force insight**

### *Part of continuous monitoring*

77. The inspectorate also operates a programme called force insight. It is part of the process of continuous monitoring and inspection design. Evidence that is acquired through force insight contributes to the assessments made by the inspectorate about forces' performance.

### *Primary purpose*

78. The primary purpose of force insight is to enable the inspectorate to establish and maintain sound and effective relations with each force and to ensure the inspectorate keeps its finger on the pulse of the force, and that its knowledge of the force is as good as it can be, including in respect of:

- (a) local patterns and trends in crime, disorder and vulnerabilities;
  - (b) local pressures which the force faces, including in respect of funding and the operational and financial circumstances of other public services (such as children's services and health) whose failures can adversely affect the police by increasing demand, and whose successes can alleviate pressure on the police;
  - (c) the force's current circumstances in respect of personnel (such as the quality, diligence, stability and continuity of its senior leadership and its succession planning), local politics and significant events; and
  - (d) special characteristics of the force, including the presence and activities of organised crime groups, the force's proximity to problems outside the force area which adversely affect demand within the force's boundaries, and its working arrangements.
79. Force insight work also includes following up on previous inspection findings and recommendations where there is a specific need to assess progress, for example in response to a cause of concern or area for improvement (as to which see paragraphs 216 *et seq*). It also provides an opportunity for the inspectorate to raise questions and seek answers from the force in respect of differences in costs or performance highlighted in the force's most recent annual value for money profile (as to which see paragraphs 66 - 73).
80. The bulk of force insight activity is work which the inspectorate's staff do in the force before an inspection. It provides the inspectorate with the opportunity to observe day-to-day policing firsthand, and to reflect on it with the personnel of the police force. Inspectorate staff may attend meetings in the police force, and then discuss them with police personnel afterwards. The work also enables the inspectorate better to design future inspection activity in the light of the particular circumstances of the force in question.

81. The force liaison lead has primary responsibility for conducting force insight activity. However, some force insight activity requires specialist knowledge, and in those circumstances other members of inspectorate staff will be involved.
82. In the case of PEEL inspections, the knowledge and intelligence obtained by the inspectorate from force insight activity assist it in establishing what should be its key lines of enquiry (KLOE) in the design of individual and multi-force inspections, and preparation for fieldwork. As to KLOE, see paragraph 186.

### *Reform of monitoring regime*

83. The two distinct entities within the inspectorate which are formally concerned with monitoring are the HMICFRS Monitoring Group (HMG) and the Policing Performance Oversight Group (PPOG).
84. The intensity of the monitoring regime, and the process of escalation, is explained further in paragraphs 62 - 134.

### **HMICFRS Monitoring Group**

85. The HMICFRS Monitoring Group (HMG) meets approximately a month before the next scheduled meeting of the PPOG. It is chaired by one of the regional inspectors of constabulary, and is attended by the other inspectors of constabulary (but not usually the chief inspector of constabulary), the chief operating officer and members of the inspectorate's monitoring staff.
86. The monitoring regime places all forces in either Scan status (formerly Stage 1 or 2) or Engage (formerly Stage 3 and above) status. Being in Scan means the monitoring of the force has not revealed performance problems sufficiently serious to warrant especial attention and the necessity for a remedial plan. Being in Engage means force monitoring has revealed just such problems.

87. HMG has the following functions<sup>27</sup> in relation to the monitoring of forces' performance:
- (a) to discuss, question and evaluate each force's performance, the approach being taken or proposed to be taken in respect of poor or deteriorating performance or any cause of concern, and any remedial action which a force may be or has been invited to take;
  - (b) to consider the judgments, provisional or otherwise, formed, or in the course of being formed, in respect of the monitoring of a force, in particular any question that a force should be moved to the Engage phase in any respect; and
  - (c) to ensure that like cases are treated alike and in every other respect a force is treated fairly.
88. HMG may commission additional analysis and the obtaining of additional information in respect of any force to facilitate the discharge of HMG's functions.
89. HMG records decisions made about forces in the monitoring process and HMIs' expectations of the progress that forces might make in improving their performance. If the force has adequately addressed a cause of concern, HMG will record any instances of notable practice which could then be used to assist other forces in the Engage phase.
90. HMG also considers causes of concern which arise or may arise in respect of several or all forces in England and Wales. This work includes making an assessment of patterns of emerging causes of concern in individual forces to

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<sup>27</sup> HMG does not evaluate and make decisions in respect of the content (including analysis, judgments and recommendations) of an inspection report under section 54, Police Act 1996. Those matters are handled separately, and are subject to regional and national moderation by HMIs to ensure consistency and fairness in inspections.

assess whether they are evidence of problems which are being encountered or are likely to be encountered by forces regionally or nationally.

### *Moving from Scan to Engage*

91. HMG is the principal mechanism by which a force is moved from Scan to Engage. There are three stages:
  - (a) the regional inspector of constabulary considers the relevant information about the force's performance, including the work of the inspectorate's analysts;
  - (b) the regional inspector of constabulary brings the matter to HMG;
  - (c) HMG decides whether or not to move the force from Scan to Engage.
92. These steps are explained in more detail below.

### *Stage 1: Consideration by regional HMI*

93. Information and analysis in respect of forces is discussed between the inspectorate's analysts and force liaison leads (FLLs). They work together to produce a summary monitoring report in respect of each force. This report contains analysis and assessment of the performance of the force. A report in respect of a force with causes of concern in particular areas is likely to include more analysis to facilitate the tracking of progress in those areas. A force with good performance overall and no causes of concern is likely to have a short summary report.
94. Analysts and FLLs consider all available and relevant information. Approximately three times each year, they record this information and update the monitoring report.

### *Stage 2: Discussion with HMI & referral to HMG*

95. The information and analysis the inspectorate obtains and produces are consolidated and presented to the regional inspector of constabulary to enable the making of an overall judgment of the performance of the force and the approach it is taking. That judgment is based on this information and the additional knowledge of the force which is possessed by the inspector of constabulary.
96. Where potential causes of concern are present, that fact will be included in the inspectorate's risk- based assessment, and used to inform its key lines of enquiry for confirmation by fieldwork.
97. If, in the opinion of the regional HMI, a force is failing or is likely to fail to respond adequately and timeously in respect of an established cause of concern, that HMI will propose to HMG that the force is moved to the Engage phase of the monitoring process. For most causes of concern, forces will be expected to demonstrate that they are responding adequately to the cause of concern after one scan cycle. However, this time period needs to be flexible depending on the circumstances.

### *Stage 3: Criteria & process for moving to Engage*

98. In considering whether a force should be moved to the Engage phase, and having regard to the paramount objective of facilitating improvement in the efficiency and effectiveness of the force, HMG will consider all the circumstances of the case, including but not limited to:
  - (a) whether the force recognises and accepts the validity of the stated cause of concern and understands its implications;
  - (b) the prospect that within a reasonable time the force will succeed in managing, mitigating or eradicating the stated cause of concern (taking into account its capacity and capability);



- (c) whether the stated cause of concern is likely to be short-lived or enduring;
  - (d) the need for public protection to be attained by the force becoming more efficient and effective in respect of the stated cause of concern;
  - (e) public confidence in the force; and
  - (f) the public law requirement of fairness.
99. The decision whether to move a force to the Engage phase is made at HMG.
100. If HMG fails to reach a consensus on that question, the decision is made by the regional HMI with particular responsibility for that force. In those circumstances, the regional HMI must record in writing his or her detailed reasons for that decision, which (subject to what is stated in paragraph 101 below) must be placed with the formal records of HMG and communicated to the force and the local policing body in question.
101. If the chair of HMG is materially dissatisfied with the decision made by the regional HMI, he or she may refer the matter to the chief inspector of constabulary who shall, after consulting all HMIs and applying the criteria specified in paragraph 98, make the final decision.
102. In cases of urgency where the regional inspector of constabulary considers the risks to the public warrant it, he or she may place a force in Engage with immediate effect and without following the procedures specified in paragraphs 98 – 101. In such a case, the regional HMI must record in writing the reasons for that decision and provide those reasons to the other inspectors of constabulary. The chief inspector of constabulary will then give consideration to whether he should write to the local policing body and/or the Home Secretary (as to which see paragraphs 124 - 129).

103. Nothing in this procedure precludes or affects the right of the chief inspector of constabulary or a regional HMI to communicate his or her concerns in connection with the performance of a force to the relevant local policing body or the Home Secretary at such times and in such terms as he or she considers necessary or expedient.
104. Other than in exceptional circumstances, a force which has been moved to the Engage phase will be considered at the next meeting of the Policing Performance Oversight Group (PPOG).
105. The focus of the Engage phase is to provide advice and assistance to the force in finding ways to improve and resolve the established cause(s) of concern where it has not been successful in doing so by itself. The PPOG provides a forum in which other interested parties – such as the College of Policing, the NPCC, the Association of Police and Crime Commissioners (APCC) and the Home Office – participate in the provision of that help.

*Communication with force and local policing body*

106. Upon a force being moved to the Engage phase, the regional HMI will write to the force to set out the cause(s) of concern in question and the factors the inspectorate has taken into account when deciding to move the force to the Engage phase (i.e. the matters in paragraph 98). The letter will contain an invitation to the force to make representations.
107. The regional HMI will invite the chief constable and the local policing body to meet with the regional HMI to discuss the causes of concern, the further monitoring which the inspectorate intends to carry out in those respects, and the force's plans to address the cause of concern.
108. Early discussions with the local policing body, whose role it is to hold the chief constable to account for performance of the force, are intended to ensure that the inspectorate has a full appreciation of the local circumstances of the force, including the priorities established for the force in the police and crime plan.

### *Development of improvement plan*

109. Forces in the Engage phase will be asked to establish an improvement plan.
110. The regional HMI will set the criteria for the force be disengaged from the Engage phase in respect of progress against the causes of concern in question.
111. At all stages throughout the monitoring process, it of course remains the obligation of the local policing body to secure that the force is efficient and effective and to hold the chief constable to account<sup>28</sup>. It follows that it is for the local policing body to have primary oversight of the implementation of any improvement plan.

### *Facilitation of support*

112. Whilst a force is in Engage, the regional HMI may decide to meet with any or all of the National Police Chiefs' Council, the College of Policing and the Home Office to request further advice and assistance for the force. This may be (but is not limited to) peer review, the provision of information about notable practice, or advice from specialists.
113. HMG also considers trends – including long-term and emerging trends – in policing and the circumstances and conditions of society which are having, or may be expected to have, an effect on demand in policing and the efficiency and effectiveness with which policing is carried out.

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<sup>28</sup> Section 1(6) and (7), Police Reform and Social Responsibility Act 2011

## **Policing Performance Oversight Group**

### *General*

114. The Policing Performance Oversight Group is part of the inspectorate's formal process that deals with cases of forces' poor performance and offers and facilitates support and remedies in cases of failure or incipient failure. When a force has been placed into Engage, its case is then automatically escalated to PPOG.

### *Purpose*

115. The PPOG enables the inspectors of constabulary to:
- (a) obtain in formal forum more information from the chief constable of the force in question in relation to his or her plans to improve the force's efficiency and effectiveness;
  - (b) receive from the local policing body in question such representations or observations in that respect as the local policing body wishes to provide;
  - (c) assist and facilitate the provision of assistance to a police force to improve its efficiency and effectiveness; that assistance is usually provided by the College of Policing and other forces (often co-ordinated by the National Police Chiefs' Council lead for performance);
  - (d) ensure the Home Office is kept informed of the inspectorate's concerns about forces' performance and the steps being taken to facilitate the remedy of any performance failures; and
  - (e) determine whether and under what conditions the chief inspector of constabulary should consider informing the Home Secretary of failures or potential failures in a police force, to enable the Home Secretary to make a determination as to the efficiency and effectiveness of the

force<sup>29</sup> and to decide whether to exercise powers of intervention<sup>30</sup> in any particular case.

### *Frequency & membership*

116. The PPOG is convened every quarter (sometimes less frequently) under the chairmanship of the chief inspector of constabulary. The other inspectors of constabulary attend, as well as:

- (a) senior members of the inspectorate's staff concerned with performance and analysis;
- (b) the chief constable of every force determined by his or her inspector of constabulary to merit the particular attention of the PPOG;
- (c) by invitation, the local policing body for each such force, or his or her representative;
- (d) the chief executive of the College of Policing;
- (e) the chief constable who is the national lead of the National Police Chiefs' Council in respect of performance;
- (f) a senior representative of the Association of Police and Crime Commissioners; and
- (g) a senior official of the Home Office.

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<sup>29</sup> Police Act 1996, section 36 (general duty of the Secretary of State to promote the efficiency and effectiveness of the police)

<sup>30</sup> Police Act 1996, section 40 (power to direct a local policing body to take measures to remedy or prevent failure of a police force); note that before giving a direction under section 40, the Secretary of State must consult the chief inspector of constabulary in that respect (see section 40(6))

### *Relationship with functions of local policing bodies*

117. The PPOG is a group designed to consider forces' problems and facilitate their resolution. It does not attempt to supplant the role of the local policing body to hold the chief constable to account.

### *Assessment of force performance*

118. As explained, a force goes into the formal PPOG process if the HMG is sufficiently concerned about its performance, usually as a result of remedial plans being considered by the regional inspector of constabulary to have failed or to be likely to fail, or to be working too slowly.
119. When a force is in Engage status, its performance is assessed in especial detail, and at the next meeting of the PPOG its case is considered. The chief constable attends. The regional inspector of constabulary explains why the force has been placed or remains in Engage, and then the chief constable provides an oral (and sometimes written) presentation in connection with the problems which have caused the force to be in Engage and his or her proposed remedies.
120. There follows a discussion by the members of the PPOG as to the adequacy of the chief's remedial plans. The NPCC lead for performance contributes to the discussion as does the representative of the College of Policing. The local policing body for the force is invited to attend, to listen to and, if he or she wishes, participate in the discussion.
121. As explained, the PPOG regime is one of support and the facilitation of assistance. Forces in Engage are considered at every PPOG meeting until it is decided by the inspectors of constabulary to move them to Scan status (formerly Stages 2 or 1).

### *Monitoring against improvement plan*

122. After an improvement plan has been established, and without prejudice to paragraph 111, the regional HMI will monitor the force's implementation of the plan, taking into account advice from PPOG.
123. The chief constable and the local policing body will be invited to subsequent meetings of PPOG and asked to provide information as to progress. The local policing body is in the lead in assessing performance against the plan. As a result of discussions at PPOG, if the regional HMI considers that there is insufficient progress with the implementation of an improvement plan, the regional HMI may:
- (a) ask for revision of the plan; or
  - (b) commission work by the inspectorate to establish the extent to which, and the time within which, any failure on the part of the force to make such progress is likely to be remedied.

### **Public letter to local policing body**

124. If, after considering the matter with PPOG and the other HMIs, the regional HMI determines that any such failure is materially unlikely to be sufficiently remedied by the force within a reasonable time, the HMI will report the matter, with his or her evidence and analysis, to the chief inspector of constabulary.
125. If the chief inspector of constabulary is satisfied that the failure in question warrants it, he will give due consideration to the sending of a public letter to the local policing body in respect of the matter. He will take into account the views previously expressed by the local policing body.

126. Any such letter will:

(a) specify the cause of concern, the inspectorate's assessment of the reasons for it, the advice and assistance provided to the force and the steps taken or not taken by the force to remedy the failure;

(b) contain such other information as the chief inspector of constabulary considers appropriate; and

(c) invite the local policing body to take such action in respect of the failure as the local policing body determines to be appropriate.

127. Other than in exceptional circumstances (including as to urgency), the chief inspector of constabulary will not send such a letter without first consulting the local policing body.

### **Home Secretary's backstop powers**

128. If the force's performance does not improve sufficiently as a result of these steps, the chief inspector of constabulary may inform the Home Secretary as to the matter with a view to him or her considering exercising his powers under section 40 of the Police Act 1996 (power to give directions in relation to police force).

129. In such a case, and where the Home Secretary is minded to give a direction under section 40, the chief inspector of constabulary will provide him or her with his written observations as required by section 40(6).



## **Moving a force from Engage to Scan**

130. If the regional HMI is satisfied that the force has achieved sufficient improvement, this will be discussed at PPOG, and the inspectors of constabulary may then decide to move the force from the Engage phase to the Scan phase.
131. If a force has more than one cause of concern in the Engage phase, the inspectors of constabulary may decide to:
  - (a) maintain the force in the Engage phase in respect of those causes of concern in relation to which they determine that insufficient improvement has been made; and
  - (b) move the force to the Scan phase in respect of the causes of concern in relation to which they are satisfied that sufficient improvements have been made.
132. In such cases, the regional HMI will write to the force and the local policing body to inform them of the matter.
133. When a force is moved from Engage to Scan, the steps taken by the force to make the necessary improvements will be discussed at HMG and PPOG.
134. The purpose of the discussions will be to establish the reasons for the success of the force in dealing with the relevant causes of concern so that notable practice may be disseminated to other forces.

# INSPECTIONS

## Types of inspection

### *Efficiency and effectiveness*

135. All inspections of police forces are concerned with their efficiency and effectiveness.
136. The inspectorate carries out several different types of inspection, described in paragraphs 135 - 147.

### *Thematic inspections*

137. Thematic inspections are inspections according to a specified theme. They are inspections into major causes of concern or problems, usually at the instance of the Home Secretary (whether in the annual inspection programme and framework or by way of section 54(2B) commission), requiring an in-depth examination and assessment in a number of forces. Some thematic inspections involve all 43 Home Office forces; most involve a cross-section of forces which are judged to be most likely to produce inspection findings indicative of the national picture, or because they are expected to be especially good or poor.
138. Thematic inspections in the last five years have included inspections into subjects such as the police handling of domestic abuse, the use of stop-and-search powers, child sexual exploitation and abuse, serious and organised crime, counter-terrorism, police corruption, the welfare of vulnerable people in police custody, crime-recording, firearms licensing, so-called honour-based violence, forced marriage and female genital mutilation, information management by the police, disclosure, youth offending, police custody, stalking and harassment, and missing and absent children.

139. Some thematic inspections are conducted on a rolling basis, that is they take place continuously, with specialist inspectors visiting forces (sometimes without notice) throughout the year. Examples are the inspections of police custody facilities and inspections of forces' crime-recording practices, and inspections of forces in respect of child protection. Rolling inspection programmes all contain periodic thematic reports, which draw together and expand on common themes. These reports may also make national recommendations (for all forces, or for national organisations such as the Home Office, the College of Policing or the NPCC).

### *Joint inspections*

140. Joint inspections are carried out with one or more of the other criminal justice inspectorates (HM Inspectorate of the Crown Prosecution Service, HM Inspectorate of Prisons and HM Inspectorate of Probation for England and Wales) or with other inspectorates or regulators such as the Office for Standards in Education, Children's Services and Skills (OFSTED), Estyn, the Care Inspectorate Wales and the Care Quality Commission, and the Healthcare Inspectorate for Wales<sup>31</sup>.

141. The chief inspector of constabulary, acting jointly with the other criminal justice chief inspectors, is required to prepare a joint inspection programme setting out what inspections they propose to carry out jointly, and what inspections they propose to carry out in the exercise of any corresponding powers (i.e. corresponding to the power to act jointly with other public authorities)<sup>32</sup>. Insofar as it relates to the work of the inspectors of constabulary, the joint programme requires the approval of the Home Secretary. The Home Secretary, the Lord Chancellor and the Attorney-General may by joint direction specify the form which the joint inspection programme is to take.

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<sup>31</sup> Police Act 1996, Schedule 4A, paragraphs 4 and 5

<sup>32</sup> Police Act 1996, Schedule 4A, paragraph 5.

142. The joint programme for the most part comprises two types of inspection:
- (a) core programmes - a series of localized, rolling inspections each year on the same principal subject (for example, the programme of police custody inspections, conducted jointly by HMICFRS and HMI Prisons); these result in individual reports for each inspection; and
  - (b) joint thematic inspections - usually single bespoke inspections visiting several localities in quick succession to contribute to a single final report on a thematic issue (for example, rape investigation and prosecution, conducted jointly by HMICFRS and HMCPSP).
143. Joint inspections concern matters which straddle the jurisdictions of the inspectorates (or, in the case of the Care Quality Commission, the regulator), and are in relation to matters where effective and close working between agencies is critical to ensuring the protection of the public, and that justice is achieved. Examples include child protection, the handling of youth offending, prosecution file quality, the disclosure of unused material in criminal proceedings, and the multi-agency response to the criminal exploitation of children.
144. A lead inspectorate is assigned to each piece of joint inspection activity, with other organisations supporting either all or part of the work. While a standard methodology is in place for joint inspections,<sup>33</sup> this means that the shape and scope vary, dependent on which inspectorate is in the lead.

*Annual all-force inspections: PEEL*

145. In 2014, in response to a request from the Home Secretary, the inspectorate introduced a new annual programme of inspections of the 43 Home Office forces in England and Wales. This is known as PEEL, which stands for police

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<sup>33</sup> HMICFRS, HMI Prisons, HMI Probation, HMCPSP (2018) *Standard Methodology for Joint Inspections*. Available at <https://www.justiceinspectorates.gov.uk/cjji/wp-content/uploads/sites/2/2018/07/cjji-standard-methodology-for-joint-inspections.pdf>

effectiveness, efficiency and legitimacy. It consists of inspections of three particular aspects of police performance. These three aspects, called the “PEEL pillars”, are:

- (a) **Effectiveness:** an assessment of whether appropriate services are being provided by each police force and how well those services work; it considers the range of the force’s responsibilities, such as cutting crime, protecting the vulnerable, tackling anti-social behaviour, and dealing with emergencies and other calls for service;
  - (b) **Efficiency:** an assessment of whether the manner in which each force provides its services represents value for money, and how well the force understands and matches its resources and assets to the demands for its services, both in the present and in planning for the future; and
  - (c) **Legitimacy:** an assessment of whether, in providing services, each force operates fairly, ethically, and within the law; this includes the treatment of those to whom the police provide services and the treatment of those who work in police forces.
146. In each of the PEEL pillars, the inspectors of constabulary make graded judgments about how well each police force performs. Before 2018, there were separate reports for each PEEL pillar in respect of each force, and they were published at different times of the year. The inspectorate also published a national report on each PEEL pillar, providing an overview of the findings of the inspection in question. The inspectorate’s practice is now to publish PEEL a single report for each force covering all PEEL pillars, providing a single coherent assessment of performance.
147. Paragraphs 153, 174 - 201, 213- 224 and 234 *et seq* explain in more detail the criteria and methodology involved in PEEL inspections.

## Inspection – Guiding principle

### *Efficiency and effectiveness*

148. As explained in paragraphs 6 - 8, the principal statutory mandate of the inspectors of constabulary is to inspect and report on the efficiency and effectiveness of every police force in England and Wales.

### *Jurisdiction*

149. As explained in paragraphs 7 - 8, there is nothing which a police force does which is outside the jurisdiction of the inspectors of constabulary.

### *Objectivity and fairness*

150. The guiding principle of inspection is that sound, objective judgments are made by the inspectors of constabulary on verified evidence obtained in a fair process, having been thoroughly and expertly analysed. The inspectors of constabulary take seriously their public law duties of rationality – which includes consistency (to treat like cases alike) – proportionality, to take into account all relevant considerations and no irrelevant ones, and to adhere to the requirements of procedural fairness.

### *Absence of statutory duties*

151. Unlike economic regulators, the inspectors of constabulary are given no explicit statutory duties (i.e. statutory objectives<sup>34</sup>). In accordance with the ordinary principles of public law, the inspectors of constabulary endeavour to discharge their statutory obligations in a way which facilitates and promotes

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<sup>34</sup> For example, the regulator for the railways has 17 statutory duties to exercise its functions (i.e. use its powers) in the manner it considers best calculated to promote improvements in railway service performance, the use of the railway network, efficiency and economy on the part of providers of railway services, and competition in the provision of railway services for the benefit of users of railway services (Railways Act 1993, section 4).

the achievement of the objectives of the legislation under which they operate, which are principally the promotion of efficiency and effectiveness in policing, and in the public interest. As also explained (in paragraph 52), the absence of political considerations and rights of others to interfere with the content of their inspection reports underscores their independence.

## **Inspection methodology – general**

### *Absence of national standards*

152. There are few national standards for the measurement and assessment of the efficiency and effectiveness of police forces. Some practices are established by the College of Policing, and where they exist they are taken into consideration in the design of an inspection. However, whilst of course persuasive and deserving of considerable weight, College of Policing standards are not determinative of the standards of efficiency and effectiveness by which the inspectorate assesses forces. The inspectorate also has regard to the work of the National Police Chiefs' Council in this respect.
153. It follows that the inspectorate must usually develop its own methodology for an inspection. In the case of PEEL inspections, the question sets and judgment criteria for PEEL inspections are kept under review and developed in the light of experience; the same is true in respect of the development of policing practice and public expectations (for example, the use by police forces of body-worn video, and increased political and media scrutiny over the police use of their powers of stop and search).
154. More information about the design of inspections is in paragraphs 170 *et seq.*

### *Margin of appreciation in judgments*

155. The measurement of the productivity – efficiency and effectiveness – of the police is a matter of considerably greater complexity than in the cases of the other criminal justice inspectorates and, in principal respects, the higher economic regulators. This is because of the diverse nature of the work of the police and the diverse local conditions in which police forces operate, and the absence of any universally established sound measures or, in many cases, as said, national standards; it therefore requires considerable independent and expert judgment after an in-depth analysis of the evidence. The margin of appreciation is wide. It is also important to note that the primary purpose of the police is the prevention of crime and disorder; this is something which is not easy to measure
156. In policing, as explained, demand is much harder to measure and predict, and not all of it will be met. An assessment therefore has to be made as to what demand will be prioritised and what demand will, in effect, be refused or its servicing delayed. Those are hard choices to be made. The risks of not meeting demand in policing are predominantly of damaged and lost lives, damaged and lost not by accident but by deliberate acts.

### **Information and access to premises**

157. As explained in paragraphs 6 - 12, the primary purpose of the inspectors of constabulary is inspecting and reporting on the efficiency and effectiveness of every police force in England and Wales. That requires the timely and efficient acquisition of reliable information, its expert analysis, and the making of rational and proportionate decisions about it.
158. Although the vast majority of the work of the inspectorate is carried out with the willing co-operation of those subject to inspection, Schedule 4A of the Police Act 1996 provides the inspectors of constabulary with statutory powers in relation to information needed for inspections.



159. These are powers to require any person to provide the inspector with any information or documents that the inspector reasonably requires for the purposes of an inspection under section 54 of the Police Act 1996, and to produce evidence or other things that the inspector reasonably requires for those purposes<sup>35</sup>. There are exceptions in cases of information held by the security and intelligence services, the military and the prosecution authorities, and in other specified cases<sup>36</sup>. There are also powers to require access to police and other premises.
160. As stated and subject to the exceptions specified above, these statutory powers may be used to require "any person" to provide information or access. This means that they do not apply only to members of police forces; they may be used to require local policing bodies and their employees to provide information and access to premises<sup>37</sup>, and they may also be used in respect of private sector entities providing services to police forces.
161. Whilst there is a right of appeal to the First-tier Tribunal against a notice requiring the provision of information to an inspector of constabulary (on the ground that the notice is illegal), no such right of appeal is available to a member of a police force, a local policing body or his or her employees, or private sector entities providing services to a police force<sup>38</sup>.
162. Sanction is available where a person served with a notice of the kind described above fails or refuses to comply with it without reasonable excuse, or (in the case of a notice requiring the provision of information) knowingly or recklessly provides information that is false in a material respect. Invoking the sanction involves the chief inspector of constabulary certifying in writing to the

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<sup>35</sup> Police Act 1996, Schedule 4A, paragraph 6A.

<sup>36</sup> Police Act 1996, Schedule 4A, paragraph 6A(6)-(9), 6E and 6F.

<sup>37</sup> This power exists in relation to the policing functions which local policing bodies have retained. As explained in paragraph 61, the inspectorate does not assess the efficiency and effectiveness of local policing bodies generally.

<sup>38</sup> Police Act 1996, Schedule 4A, paragraph 6D

High Court that the person has failed to comply with the notice. The High Court may then inquire into the matter and, after due process, may deal with the person as if he or she had committed a contempt of court<sup>39</sup>.

## Force management statements

163. In 2018, after considerable consultation with police forces, local policing bodies, policing institutions, staff associations and the Home Office, the inspectorate introduced a new instrument by which the inspectorate obtains information from police forces for the purposes of inspection. It is called the force management statement, and is modelled on network management statements used in other safety-critical, asset-intensive, monopoly, essential public services<sup>40</sup>.
164. All well-managed enterprises – public sector and private – have sound information about their resources, workforce and other assets, and what they are required to do. They need information about demand to plan, and they need information about their assets to ensure those assets will be fit for purpose to meet future demand. If they do not have that information, their efficiency and effectiveness will almost certainly be impaired.
165. A force management statement is an annual statement produced by the chief constable (and London equivalents) (with necessary redactions on security grounds) of:
- (a) the **financial resources** which the force expects to have in each of the succeeding four years;
  - (b) the **demand** – latent and patent, crime and non-crime – which the force expects to face in each of those years; and

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<sup>39</sup> Police Act 1996, Schedule 4A, paragraph 6C

<sup>40</sup> They are: telecommunications, water, gas, electricity and railways.

- (c) in relation to the **assets** (predominantly people) which the force has to meet that demand:
- (i) the **capacity** of the workforce and other assets – how much work can they do;
  - (ii) their **capability** – what is it they can do: their skills, for example: response, investigation, roads policing, public order, firearms, child protection, neighbourhood, crime scene investigation, intelligence and analysis, leadership, management and supervision, business planning and financial and commercial acuity, and the extent to which those skills are likely to meet the demands which the force faces and will in future face;
  - (iii) their **condition** – matters such as physical fitness and impairments, mental health, professional attainments, and seniority;
  - (iv) the **serviceability and wellbeing** of the workforce and other assets – what does it take – in money, time and effort – to look after the workforce and other assets, to ensure they are in their best practicable condition and operate at their best, for example: training and professional development, improvements in skills and resilience, care for officers and staff suffering physical or mental impairments, and improvements in supervision, efficiency and effectiveness;
  - (v) workforce **performance** – how well do they perform; what measure of productivity can reasonably be expected from them, and how should and will that productivity change over time; and
  - (vi) **security of supply** – how resilient is the overall capacity of the force in terms of meeting surges in demand.

166. The force management statement must also contain and explain the chief constable's plans for improving the efficiency and effectiveness of the force in the period covered by the statement.
167. It should also contain a report, with reasons, on the force's performance in the last year against projections made for that year in the last force management statement.
168. The format of the template force management statement is specified by the inspectors of constabulary<sup>41</sup> and the chief constable is required to certify that, except to the extent and in the respects specified in the statement, the information it contains is complete and accurate in all material respects.
169. Force management statements are being introduced by the inspectorate over three years. The first year's force management statements were submitted to the inspectorate in May and June 2018. All 43 Home Office forces did so, as did the British Transport Police. The second year's force management statements were submitted in May and June 2019. They are used in inspection design and the assessment of the risks which forces present.

## Inspection design

### *Annual programme & role of Home Office*

170. Almost all inspections are provided for in the inspectorate's annual inspection programme and framework, approved by the Home Secretary, or the joint inspection programme (see paragraph **Error! Reference source not found.**). The inspection programme is a high-level document, and usually contains little detail beyond the nature of the inspection to be done. After the inspection programme has been approved, the inspectorate staff usually

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<sup>41</sup> The power to do so is in Police Act 1996, Schedule 4A, paragraph 6A(4); however, it has not been necessary for the inspectors of constabulary to use that formal power as all chief constables have voluntarily complied with the request to prepare and submit their force management statements.

engages with Home Office officials to establish in detail the scope of the inspection, including what the Home Secretary wants examined, the number of forces to be inspected and the intensity of the inspection. This process is almost always informed by the costs of an inspection, the more extensive and intensive inspections naturally being the ones which take longest and cost most.

171. Once this work has been done with the Home Office, a particular inspection will be allocated by the Board to a senior staff member called the portfolio director. In association with others, the portfolio director will further develop the exact terms of reference for the inspection design, and eventually that will be presented to the Board for approval.

#### *Inspection Management Group*

172. The inspectorate's Inspection Management Group (IMG) is chaired by the chief operating officer. It is the committee of the Board which decides on and provides the appropriate resources, financial and policy support to the inspectors of constabulary as they plan and carry out the inspections for which they are primarily responsible. Its focus is on strategic planning and logistical support, and the management of risks to the inspection programme. It is concerned with the resourcing of inspections, which the Board is responsible for approving. It also monitors the progress of inspections.

#### *Inspection Development Group*

173. The Inspection Development Group (IDG) is a committee of the Board. It is chaired by one of the inspectors of constabulary, and directs the design and development of future PEEL assessments, specialist thematic inspections (and, since 2017, fire and rescue inspections). (In the case of joint inspections, this work is done by the Criminal Justice Joint Inspectorates development group, comprising senior representatives from each of the criminal justice inspectorates.) It also oversees the arrangements for collecting, collating and using evidence to ensure that the inspection in

question takes full account of the breadth and complexity of police practice and the operating context of each force. It brings together, in one place, a group to review the design of the inspectorate's inspection programme and its methodologies. It works with the Inspection Management Group to ensure that the order in which inspections are carried out is as efficient and effective as possible.

174. The Inspection Development Group draws up the assumptions and criteria for the making of grading and other judgments. It develops and manages the policies and principles which govern each stage of inspection development. The group also commissions and directs research to facilitate the improvement and development of future inspections, and consults upon and evaluates the methodology of inspections. It carries out an assessment of inspections after they have been completed, to ensure that future inspection design has the benefit of any lessons learned. The group considers future developments in policing, so as to ensure that the inspectorate is aware of developing trends, and commissions the development of new ways of collecting and collating evidence. It also manages strategic inspection risks, and is responsible for the continued development and management of the force insight programme.

#### *Technical Advisory Group*

175. The inspectorate's Technical Advisory Group (TAG) advises on the best data and documents and methods by which the inspectorate obtains evidence for its inspections. The TAG is also given the opportunity to comment on the inspection questions to be used. The TAG contains members from outside the inspectorate. It is chaired by the Director of Better Inspections at the inspectorate; its membership includes the heads of performance analysis in several police forces, and representatives from the Home Office, the Office of National Statistics, the Association of Police and Crime Commissioners, the College of Policing and the Independent Office for Police Conduct.

### *External Reference Groups*

176. In designing inspections, the inspectorate also uses its External Reference Groups (ERGs). There are ERGs for separate parts of the PEEL programme and for specialist inspections. They are usually chaired by one of the inspectors of constabulary. They comprise representatives of the National Police Chiefs' Council, the College of Policing, special interest groups (for example, Women's Aid, Liberty, StopWatch, and the National Society for the Prevention of Cruelty to Children), the Home Office and the Association of Police and Crime Commissioners. In some cases, they also include academics, the Welsh Government and the Victims' Commissioner. The groups assist the inspectorate in focusing on what matters most in the area of inspection, the judgment criteria which should be used and the standards to be applied. They also advise on proposed inspection methodology.

### *Senior responsible officers*

177. In relation to the PEEL inspection programme, and thematic, rolling and *ad hoc* inspections, the Board appoints one of the inspectors of constabulary as the senior responsible officer (SRO).

178. The SRO has the authority to carry out the inspection in question. That authority comes from the Board.

179. The SRO has overall control of the inspection, subject to the need to obtain timely Board approval of material matters including the matters specified in paragraph 183. The SRO is required to keep the Board informed of the progress of the inspection.

180. Subject to these requirements and limitations, the SRO has responsibility for the end-to-end inspection. Other inspectors of constabulary are expected to co-operate with the SRO in that respect, to ensure the inspection is sensitive to and fully conversant with any particular local circumstances in individual forces.

181. More information about the scope of the authority of the SRO in an inspection, including as to the overriding principle of fairness and consistency in judgments, and the process of moderation of judgments (and therefore force gradings), is given in paragraph 234 *et seq.*

### *Portfolios*

182. Responsibility for policing inspections is split between three inspection portfolios: the PEEL portfolio; the non-Home Office forces and specialist thematic portfolio; and the criminal justice joint inspection and protecting vulnerable people inspections portfolio. Each of these teams comprises the staff of the inspectorate who design the inspection in question, including writing the question sets and the judgment criteria. They also ensure consistency of quality standards and review the inspection findings to ensure that forces in comparable circumstances are treated fairly. The PEEL portfolio team is also responsible for writing the national reports. In the other two inspection portfolios, assistant portfolio directors also write force-level reports, and carry out the inspection activity themselves, accompanied by specialist inspection officers (sometimes with support from the regions).

### *Board approval required*

183. In relation to inspections, the chairs of relevant internal groups and the SROs for inspections are required to obtain timely Board approval of material matters such as:

- (a) a material change to the design of an inspection;
- (b) a change in the number of forces subject to an inspection;
- (c) a material change to the cost or timing of an inspection; and



- (d) the making of inspection findings or recommendations which are likely to have a significant effect (adverse or otherwise) on the reputation of any force or the National Crime Agency (including its grading<sup>42</sup>), the Home Office, any local policing body, the College of Policing or the inspectorate.

### *Information sources*

184. The inspection design is informed by what the inspectorate already knows:

- (a) about the subject-matter of the inspection (for example, offences against children, terrorism, serious organised crime, neighbourhood policing, vulnerability);
- (b) about the forces most likely to yield useful information (through the force liaison work and other regular engagement of the inspectors of constabulary and inspectorate staff with individual forces);
- (c) from the knowledge of the inspectorate's analysts and other staff, and from external experts such as academic reference groups, and reference groups composed of other experts (for example, charities and other voluntary organisations working in the fields of domestic violence, child protection, and crimes in or against particular communities); and
- (d) from each force's force management statement.

185. In designing inspection activity, the inspectorate also draws on its knowledge of the circumstances of the individual forces to be inspected. In the case of PEEL inspections, that of course includes every force.

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<sup>42</sup> Grading decisions are usually determined through the moderation processes, as to which see paragraph 234 *et seq.*

186. The inspectorate's monitoring regime (including force insight) provides considerable information which is used in inspection design. In relation to the PEEL programme, a product of its monitoring regime is the inspectorate's assessment of key lines of enquiry (KLOE). The key lines are force-specific and are developed by the force liaison lead and are matters of particular focus and importance in inspection, derived from the inspectorate's close liaison with and knowledge of the force in question. The KLOE approach is designed to ensure the inspection of the particular force concentrates on areas of greatest risk and opportunities to show sound and commendable policing practice. It is also designed to ensure that all evidence is taken into account in a systematic way.

#### *Question sets in inspections*

187. In the PEEL programme, there are four levels or tiers of question which the inspectorate asks in order to make its judgments about a force's efficiency and effectiveness.

188. The principal question in a PEEL inspection is the pillar, such as: "How effective is the force at keeping people safe and reducing crime?"

189. Below that single pillar level question are several core questions, such as: "How effective is the force at investigating crime and reducing re-offending?"

190. Underneath each core question are several diagnostic questions, for example: "How effective is the force's initial investigative response?" Under each diagnostic question are several sub-diagnostic questions, such as: "How effectively does the force gather evidence at first contact and allocate resource for initial investigation?"

#### *Indicators and judgment criteria*

191. In order to answer these questions, the portfolio team will have devised specific indicators, i.e. things the inspectors should look for as evidence of

either the satisfactory or the unsatisfactory answer to the question. For example, inspectors will look for specific evidence as to whether call-handlers have access to all force intelligence systems to inform their decision-making.

192. Evidence to answer inspection questions almost always comes from a range of sources. Some will be quantitative and some will be qualitative. The inspector will consider the merits of the different sources of information, their strengths and weaknesses, and arrive at a judgment which strikes the most appropriate balance. The inspector will rarely accept evidence from a single source. Usually, all material evidence, to be accepted, must be triangulated; in other words, there must be at least two other sources which support the first source of evidence. For example, senior officers may assert that the force is assiduous in responding promptly and sensitively to vulnerable victims. The inspectorate staff would then check that assertion with focus groups of frontline police officers, examine their log and day books, and consult victims' support groups.
193. Rarely will inspectorate staff accept evidence from only two sources.
194. Inspectorate staff normally have guidance about the weight which each question carries in relation to the overall judgment to be made about a force.

#### *Evidence-gathering template*

195. These factors are all used to devise a force-specific evidence-gathering template (EGT) for the inspection of that force. The EGT is the principal receptacle for the evidence obtained by inspection staff when in the force, obtaining evidence according to the question set and judgment criteria for the inspection.
196. The inspectorate usually provides a copy of the question set to each force before the beginning of fieldwork.

### *Other evidence-gathering*

197. Dependent on the design and scale of the inspection, the inspectorate uses several other methods to collect evidence in support of its inspection programme. Activities include: document requests; self-assessments; data requests; and case file reviews.
198. The document requests and self-assessments are an opportunity for forces subject to inspection to provide the inspectorate with evidence of their performance against the inspection questions. In both cases evidence is submitted by forces and then considered by FLLs and inspection portfolio staff.
199. Data requests are made of forces (where appropriate) before inspections to inform pre-inspection briefings and fieldwork. Data are submitted by forces (or taken from other organisations) and used to produce analyses to identify areas of interest for the inspection teams. Where data are collected and used by the inspectorate, forces are given the opportunity to validate data and to comment on any context and propose corrections.
200. Case file reviews are used by the inspectorate, either before or during fieldwork, to test a sample of files to make an assessment on how a force is performing in a certain area of the activity (for example, crime-recording or domestic abuse). This work provides evidence direct from the force on its performance, and where decisions are contentious findings will be reviewed with the force to ensure the inspectorate has a sound understanding of the final position. In the case of joint inspections, case file reviews provide information about the experience of complainants, witnesses and suspects, and the quality of decision-making in those cases.
201. Information from these collections is combined with that gathered from monitoring, insight and fieldwork to allow the inspectorate to come to a rounded view of force performance.

### *Fieldwork led by FLL*

202. PEEL inspection fieldwork - that is, where inspectorate staff visit the force and obtain evidence through examination of documents, case files, observation of policing activity and interviewing force personnel – is led by the FLL.

### *Strategic briefing*

203. Inspections usually begin with what is called a strategic briefing, which is based on the questions in the question set. This is a meeting of the senior leadership of the force and senior members of the inspectorate. The strategic briefing is a briefing by the force, addressed to the inspectorate. It is usually conducted by the chief constable, and attended by the force's senior leadership team (deputy chief constable, assistant chief constables, chief finance officer and others). From the inspectorate, usually the inspector of constabulary attends, together with the force liaison lead, the inspection officer and some other members of the inspectorate staff who are to be conducting the inspection. It is predominantly the force speaking and the inspectorate listening.
204. The briefing allows the force to explain the progress it has made since the last inspection, its current position and its plans for the future. It also provides an opportunity for the inspector of constabulary and the inspection team to ask questions.
205. The briefing can also help to direct evidence-gathering.
206. The fieldwork then takes place.

### *Hot debrief*

207. At the end of the fieldwork, there is another meeting with the senior leadership of the force, at which the inspectorate provides initial feedback to the force on what has been found. It is the closing fieldwork debrief, usually

referred to as the hot debrief. It is almost always attended by the chief constable and members of the force's senior leadership team. The local policing body often attends, and is usually invited. The inspector of constabulary usually does not attend.

208. The purpose of the hot debrief is to provide the force and the local policing body with a high-level summary of the evidence obtained against the inspection criteria, and to highlight any areas which should be addressed without delay. Examples are problems with performance in the force control room which could be jeopardizing public safety, and the discovery of a backlog in responses to calls for service in cases of domestic abuse where high-priority incidents are not responded to for periods up to 24 hours.
209. The hot debrief is not a comprehensive account of the evidence obtained, and it does not provide graded judgments or even an indication of what they might be. As explained in paragraph 234 *et seq*, the making of such judgments comes much later in the process, after analysis and moderation. Such judgments are made only by the inspectors of constabulary, after careful consideration of the local force-specific and the overall regional pictures.
210. It is of course possible for a force to gain a sense of how the evidence stands against the judgment criteria, and likely overall themes of the inspection, but no link should be made explicitly at this stage; that would be premature.
211. The debrief is also not an opportunity for forces to challenge the inspection team's findings, although if the force has further evidence that it believes would be useful for the inspectorate, this will be accepted and taken away for analysis.
212. The staff of the inspectorate make the status of the hot debrief clear and explicit. They stress that what is said are initial findings, and that there is more to be done in gathering and analysing evidence. They say that findings, judgments and recommendations will be subject to moderation and determination by the inspectors of constabulary concerned.

## **Determination of force gradings and other conclusions of inspections**

### **Post-fieldwork analysis**

213. After the fieldwork, the inspection team assesses in greater detail the evidence gathered against the judgment criteria for the inspection. The portfolio team and the inspectorate's analysts also work on it. This is a period and a process of considerable detailed work, leading to the making of preliminary judgments about the efficiency and effectiveness of the force.

### **Gradings**

214. The gradings which the inspectorate gives to forces in respect of particular aspects of their performance are: (1) outstanding; (2) good; (3) requires improvement; and (4) inadequate. Few forces attain gradings (1) or (4).
215. The gradings attained by forces against the principal elements of the PEEL inspection programme are published in the relevant force and national reports. They also appear in a national table in the annual state of policing report published by the chief inspector of constabulary.
216. If, during an inspection, a serious, critical or systemic shortcoming is identified in practice, policy or performance, it will be reported as a cause of concern. In every such case, the inspection report will contain a recommendation to make changes to alleviate or eradicate it. There will always be at least one recommendation for each cause of concern. The progress which the force makes in relation to the cause of concern will be reviewed by the inspectorate at a later date. Because of its critical and/or serious nature, the method and timing of this review will be determined by the precise nature of the cause of concern. All causes of concern are monitored until they have been removed.

217. In the cases of thematic reports, the inspectorate may make recommendations even though there is no registered cause of concern.
218. If, during an inspection, the inspectorate finds an aspect of practice, policy or performance which falls short of the necessary standard, but which is not a serious, critical or systemic shortcoming, this may be reported as an area for improvement. Areas for improvement will not usually be accompanied by a recommendation.

### *Evidence-based judgments*

219. The analysis and the making of judgments (preliminary and final) are on the basis only of evidence. In the inspectorate, stress is placed on there being an unbroken bright line through inspection design, inspection fieldwork and the gathering of evidence, the analysis of that evidence and the final determination of the grading which is justified by the evidence and analysis.

### *Provisional gradings*

220. After the hot debrief, the inspection team discuss the provisional judgment gradings which they believe are justified. The team leader conducts this discussion in order to understand the force's performance compared to the hypotheses being tested, the inspection questions and the other criteria for assessment.
221. The purpose of the judgment-grading discussion is for the inspection team to reach a provisional judgment for each of the principal questions, as well as an overall judgment.
222. As said, the work draws explicitly on evidence gathered in the inspection. In reaching provisional judgments, inspection teams generally adopt a 'best-fit' approach for each of the core questions. This is not done by simply aggregating the criteria met under each description. For instance, if a force meets most, but not all, of the criteria used to arrive at a judgment of *good*, it



does not automatically follow that the force should be judged as *good* for that question. The criteria are not exhaustive, and not all of them need to be satisfied to arrive at an appropriate judgment. However, some questions specify minimum requirements which must be met for a judgment of *good* or *outstanding* to be given. If it is considered that inconsistent or poor practice in one area, or a combination of areas, would put people at serious risk, there would need to be a strong justification as to why the judgment on that question is not *requires improvement* or *inadequate*, irrespective of the inspectorate's scoring of the force's performance on other parts of that question. For example, in a domestic abuse case, a force's inability to respond sufficiently promptly to an urgent call for service is likely to amount to a failure so severe as to outweigh any other favourable indicators in that context. This type of shortcoming is likely to amount to a serious failure of policy or practice, with a registered cause of concern and a corresponding recommendation in the inspection report.

223. There is a link between graded judgments on the one hand and causes of concern and areas for improvement on the other. A force can be graded no higher than *requires improvement* in respect of a particular question if there is a cause of concern established. A force can be graded no higher than *good* for a question where an area for improvement has been established. Where a force is given a judgment of *inadequate* in any respect, there must be at least one cause of concern for that question. Where a force is given *requires improvement* in any respect, there must be at least one cause of concern or area for improvement in relation to that question.
224. If a force has developed or is developing plans to remedy a problem, this does not make the current service *good*. It may still require improvement, although credit for the force's actions can be given in the inspection report. If the direction of travel is positive, this can be acknowledged in the report, but the overall judgment will reflect the current service to the public by reference to the dates of the fieldwork.

### *First draft report*

225. In the case of PEEL inspections, the inspection team leader completes and sends to the chief of staff a first draft of the force report, a post-fieldwork report, a moderation document, a copy of the hot debrief (which may include comments from the force), and a combined evidence-gathering template which draws together the principal evidence obtained by all members of the inspection team. The team leader also arranges to speak to or visit the force to discuss in more detail the emerging findings so that the force is clear on the areas it should prioritise before the report is published.

### *Quality assurance*

226. Draft reports are subject to a quality assurance process to ensure that they are factually accurate and complete, and that the judgments are supported by and consistent with the evidence. One of the objectives of the process is that it should be established that the report directly and clearly answers all inspection questions, and the evidence is framed in a way which provides a sound assessment against the inspection question. In other words, it is an explicit requirement of the quality assurance of reports to ensure that the bright line of evidence remains intact.
227. The first check of a PEEL report is carried out by the chief of staff. It is then reviewed and checked again by the portfolio team (the inspectorate staff principally concerned in detail with the inspection in question), and then by the inspectorate's analysts.
228. Proposed judgments about gradings can change as a result of the quality assurance process, before moderation. This happens, for example, when evidence and gradings from and in respect of other, similar forces are available and considered, and when senior specialists in the subject-matter of the inspection have reviewed the evidence and proposed gradings.

229. Where forces operate under a collaboration agreement<sup>43</sup>, the inspection must of course take account of the relative performance of the forces in collaboration. Collaboration agreements can be in respect of particular policing activities, such as firearms, other specialist capabilities, and serious organised crime. None covers all activities of two or more police forces.
230. It is possible that the performance of one force in respect of collaborated activities is less efficient and effective than the performance of one or more of the other collaborating forces. This may lead to different gradings for the forces in question in respect of the same activity.
231. It is also possible for a force which has received a particular grading to be moved to a grading which is not the immediately adjacent one. So, it is possible for a force to go from *good* to *inadequate*.
232. After the quality assurance process, the report is then edited.
233. The principal findings and conclusions (judgments) in the report are then subject to regional and thereafter national moderation.

## Moderation

### *Purpose*

234. The purpose of moderation for PEEL inspections is to:
- (a) establish appropriate judgments for forces, by considering whether the proposed judgments are fair and accurate and are based on a consistent assessment of the evidence against the judgment criteria, and ensuring that like cases are treated alike (i.e. forces with the same characteristics – good or bad – are treated the same); and

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<sup>43</sup> Under section 22A, Police Act 1996

- (b) check that proposed recommendations are worded consistently and are made in response to causes of concern of appropriate weight and severity.

235. Moderation enables inspectorate staff who have been involved in the inspection, and other inspections, to engage in constructive dialogue and challenge in respect of the conclusions reached by one another.

236. The moderation process is designed to ensure proportionality and consistency, as part of the inspectorate's obligation to ensure fairness. All inspections which lead to graded judgments must go through regional moderation at least, as to which see paragraphs 240 - 242.

#### *Focus of moderation*

237. At moderation meetings, particular focus is given to forces with the highest and lowest provisional gradings, and to those on the borderline between grades.

#### *Available information*

238. In addition to evidence gathered from inspection, those participating in moderation meetings have available to them:

- (a) information about the particular circumstances, including local conditions, of the force;
- (b) information from the inspectorate's continuous monitoring process; and
- (c) relevant data from other sources, such as publicly available data gathered specifically for the inspection.

239. Moderation meetings are supplied with detailed documents which explain the rationale for the provisional gradings for each force, and records are made of all decisions taken.

#### *Regional moderation*

240. Regional moderation deals with all forces in the region in question. Regional moderation is usually chaired by the regional chief of staff, and attended by all the force liaison leads in the region, the inspection officers who led the inspections, the deputy portfolio director (to provide a national-level context), at least one analyst, the head of the inspectorate's research and development team and, where appropriate, a subject expert lead. On occasions, alternates would attend. The regional inspector of constabulary also attends and may chair the moderation.

241. Regional moderation makes provisional decisions on grading, with special attention being paid to forces on the borderline of one grade and another.

242. After regional moderation, the regional inspector of constabulary then takes the regional moderation conclusions to national moderation, at which they are discussed in the context of all other forces, especially forces in similar circumstances.

#### *National moderation*

243. Regional moderation must send to national moderation:

- (a) those force gradings which may have a significant effect (adverse or otherwise) on the reputation of any force (including its grading), any local policing body, the College of Policing or the inspectorate;
- (b) instances of force performance which may be indicative of a trend or pattern in a particular respect which may be relevant to forces in other regions;

- (c) all force gradings which concern the best-performing and worst-performing forces, whether in individual instances of performance or because of a consistency in good or poor performance; and
- (d) such other forces which those participating in regional moderation have determined for any other reason to be appropriate for consideration at national moderation.

244. If a matter is not sent to national moderation, or is not called into national moderation<sup>44</sup>, the grading determined by the regional inspector of constabulary at regional moderation will stand.

245. National moderation is concerned with ensuring consistency and fairness in all inspection findings, so that like cases are treated alike. The 43 police forces of England and Wales vary very considerably in size (in numbers of police officers and police staff, and budgets), geographical areas and problems (including the nature and extent of crime, disorder and safeguarding requirements) and in other respects. Many forces are not comparable with others. The moderation process is designed to reflect and respect those differences.

246. National moderation must consider:

- (a) all matters of the kind referred to in paragraphs 238 - 243; and
- (b) such other force gradings, instances of force performance and other matters as the SRO decides should be called to national moderation even though the regional inspector of constabulary has not referred the matter to national moderation.

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<sup>44</sup> As to which, see paragraph 246(b).

247. At national moderation, all inspectors of constabulary – other than the chief inspector of constabulary – are present, with such other members of inspectorate staff as are appropriate. The chief inspector of constabulary may attend and participate at national moderation, in his discretion. The SRO for the inspection chairs national moderation.
248. National moderation will arrive at force gradings in all cases under consideration. As far as reasonably practicable, national moderation will do so by consensus of the inspectors of constabulary.
249. In the case of a disagreement on a force grading, and after full consideration of the matter involving all the inspectors of constabulary at national moderation:
- (a) in relation to a PEEL grading, the view of the regional inspector of constabulary will prevail over that of the senior responsible officer (if different, of course); and
  - (b) in relation to an inspection other than PEEL, the view of the senior responsible officer will prevail over that of the regional inspector of constabulary.
250. If the regional inspector of constabulary or senior responsible officer in question remains dissatisfied with the matter, he or she may refer it to the chief inspector of constabulary who will take the final decision.

### *Report finalisation*

251. After national moderation, the reports are edited and finalised. Forces are provided with copies for pre-publication checks, otherwise known as factual accuracy checks. This stage in the process provides forces with opportunities to correct matters of fact. It is not an opportunity for forces to try to negotiate inspection findings, which are never open to negotiation.

252. If material matters of fact come to light and may justify a change in judgment or grading, the matter will be reconsidered by the inspector of constabulary in conjunction with the senior responsible officer, and may be re-moderated. This process can lead to a grading being changed. Mere disagreements on the part of a force are not sufficient to justify alterations.
253. After the report has been finalised after pre-publication checks, and is ready to be published, forces and local policing bodies are given advance copies in case there is media attention, to allow them to prepare for it. Inspectorate reports usually receive considerable local media attention, and often national attention.

### **Follow-up**

254. Publication of an inspection report is a major milestone. However, it is by no means the conclusion of the inspectorate's work to facilitate and encourage improvements in policing in that area. Follow-up activity is an integral part of the inspection cycle.
255. The inspectorate conducts an internal lessons-learned exercise after each publication. This helps ensure that the inspectorate builds on what has worked well in an inspection (whether in terms of logistics or in the choice of evidence-gathering method, for instance). The majority of follow-up work is however focused on working with the police, and others to whom recommendations are made, to ensure progress is made.
256. The nature of follow-up work varies, depending on the recommendations made. Rolling inspection programmes have formal follow-up inspection activity built into their design (although this may be automatic, for all forces, or limited to those forces where findings have been poor). In child protection inspections, for instance, forces are required to produce an action plan in response to recommendations, and an inspection team then conducts either a full reinspection, or a shorter, post-inspection review, dependent on the findings of the original inspection.



257. In relation to national thematic inspections, FLLs monitor progress against recommendations in forces, while the portfolio team maintains oversight of this (advising where necessary on whether progress is being made). The portfolio team is responsible for assessing the response to national recommendations made to entities such as the Home Office or the NPCC, and more broadly for ensuring that both recommendations and wider inspection findings are widely disseminated to and understood by relevant interested parties. For custody inspections, for instance, this work includes a regular agenda item at the NPCC custody forum; creation of articles for IOPC 'lessons learned' newsletters on custody practice; and advising the Home Office on findings of interest.

## **Challenge to inspectorate judgments**

258. If a force or other interested party is aggrieved in connection with a decision of the inspectors of constabulary or any of them, the appropriate remedy is judicial review.

## Definitions and interpretation

Unless the context otherwise requires, references below to paragraphs are to paragraphs of this document

ad hoc inspection	inspection carried out at the instance of the chief inspector of constabulary under paragraph 2(6) of Schedule 4A to the Police Act 1996; an inspection which is not part of the annual inspection programme approved by the Home Secretary or a commissioned inspection; see paragraph 43
area for improvement	an aspect of a force's practice, policy or performance which falls short of the necessary standard but is not so serious as to constitute a cause of concern; see paragraphs 216 - 218
associate	a member of the inspectorate staff who is a specialist in a particular field (for example, counter-terrorism or child protection) and who can be called upon to participate in inspections or assist the inspectorate in other ways
Board	the meeting of the inspectors of constabulary and the inspectorate's chief operating officer, usually held monthly; the board has no formal legal status, and does not take decisions by vote; it deals with matters of the greatest importance in the affairs of the inspectorate, including securing the long-term success of its inspection programme and establishing, promoting and protecting the culture and values of the inspectorate; it establishes committees of the Board which report to the Board; see paragraphs 17 - 23, 171 - 179 and 183; for the remit of the Board, see in particular paragraph 20
cause of concern	a serious, critical or systemic shortcoming in a force's practice, policy or performance; see paragraph 216
chief of staff	officer of the inspectorate, attached to an HMI, who has primary responsibility for the affairs of the HMI at regional level; they are all police officers or other law enforcement professionals, serving or retired; their responsibilities

	include the oversight of all inspections in their regions, including co-ordination of inspections taking place at the same times, the leadership and co-ordination of force liaison leads and inspection officers; they are also responsible for the management of the relationships of the inspectorate with the forces and local policing bodies in their regions
commissioned inspection	an inspection commissioned either by the Home Secretary or the local policing body; see paragraphs 40 - 42
CPMG	Crime and Policing Monitoring Group; see paragraph 56
Engage	the status of a force which has been escalated from Scan status; see paragraphs 63 and 86 - 134
ERG	External Reference Group
escalate	the moving of a police force from Scan to Engage status in the monitoring regime; see paragraphs 94 - 134
External Reference Group	one of several groups which assist the inspectorate in focusing on what matters most in a particular area of inspection, and the judgment criteria which should be used and the standards to be applied in an inspection; they also advise on proposed inspection methodology; see paragraph 176
FLL	force liaison lead
force insight	programme forming part of the monitoring process the primary purpose of which is to enable the inspectorate to establish and maintain sound and effective relations with each force and to ensure the inspectorate keeps its finger on the pulse of the force, and that its knowledge of the force is as good as it can be; see paragraphs 77 - 82
force management statement	annual statement of the chief constable (and London equivalents) of a force, submitted to the inspectorate, providing the force's self-assessment for the following four years of: (a) the demand (latent and patent, crime and non-crime) likely to be faced by the force; (b) the state of the force's assets (including its workforce); and (c) its expected financial resources; in relation to the force's

	assets, the statement must cover their condition, capacity, capability, performance, serviceability and security of supply; it must also state what steps the force will take to improve its efficiency, and whether and to what extent its demand is expected to exceed the force's capability to meet it; see paragraphs 65(d) and 163 - 169
force liaison lead	in relation to each force, the inspectorate's lead expert on that force; in the PEEL programme, force liaison leads lead the inspections of those forces, design the detail of the fieldwork, keep up to date on developments within their forces, and write the major part of the relevant report; see paragraph 31
grading	evaluation made in relation to a force's performance in respect of efficiency, effectiveness or legitimacy, as part of the PEEL programme of inspections; the grades are <i>outstanding, good, requires Improvement and inadequate</i> ; see paragraphs 146, 209, 214 - 224 and 236
HMCIC	Her Majesty's Chief Inspector of Constabulary
HMG	HMICFRS Monitoring Group
HMI	an inspector of constabulary
HMICFRS Monitoring Group	the inspectorate's group primarily concerned with the monitoring of the performance of police forces; see paragraphs 85 - 134
hot debrief	closing debrief given to the senior leadership of a force by the inspectorate at the end of fieldwork in that force; provides the force with a high-level summary of the evidence obtained against the inspection criteria, and any areas which should be addressed without delay; see further paragraphs 207 - 212
Inspection Development Group	committee of the Board, chaired by one of the inspectors of constabulary, which directs the design and development of future PEEL assessments, joint and thematic inspections; see paragraphs 23 and 173 - 174
Inspection Management Group	committee of the Board which decides on and provides the appropriate resources, financial and policy support to the

	<p>inspectors of constabulary as they plan and carry out the inspections for which they are primarily responsible; its focus is on strategic planning and logistical support, and the management of risks to the inspection programme; it is concerned with the resourcing of inspections, which the Board is responsible for approving; it also monitors the progress of inspections; see paragraphs 16(d), 23 and 172</p>
inspection officer	<p>member of the inspectorate staff who works directly to a force liaison lead, and maintains an enduring and close knowledge of the affairs of specified forces; takes a prominent role in the carrying out of the inspection, supervising inspection staff from the inspectorate's pool of inspection staff, chosen according to their expertise and experience and the nature of the inspection</p>
inspection programme and framework	<p>the document setting out what inspections will be carried out in the inspection year, and manner in which the inspections will be conducted; it requires the approval of the Home Secretary under paragraph 2(2B) of Schedule 4A to the Police Act 1996; see paragraphs 34 - 37</p>
IOPC	<p>Independent Office for Police Conduct, the statutory body which investigates complaints against individual police officers or groups of police officers</p>
joint inspection	<p>an inspection carried out with one or more of the other criminal justice inspectorates or with other inspectorates or regulators, concerning one or more matters which straddle their jurisdictions, and is in relation to matters where effective and close working between agencies is critical to ensuring the protection of the public and the achievement of justice; see paragraphs 140 - 144</p>
key lines of enquiry	<p>force-specific lines of enquiry which are developed by the relevant force liaison lead; they are matters of particular focus and importance in inspection, derived from the inspectorate's close liaison with and knowledge of the force in question; see paragraphs 82 and 186</p>
KLOE	<p>key lines of enquiry</p>

local policing body	the police and crime commissioner for the force in question; in the case of the City of London, the Common Council of the City of London in its capacity as police authority for the City of London police area; in the case of the Metropolitan Police, the Deputy Mayor for Policing and Crime in respect of the Metropolitan Police district; in the case of Greater Manchester, the Deputy Mayor of Greater Manchester on behalf of the Greater Manchester combined authority
moderation	see <i>national moderation</i> and <i>regional moderation</i>
monitoring	process of continuous assessment and evaluation of the efficiency and effectiveness of forces, operated by the inspectors of constabulary, properly to inform their decisions about what inspections are necessary; monitoring applies to all forces; see paragraphs 62 - 135
MSG	most similar group; see paragraphs 69 - 73
national moderation	the process in which all regional HMIs assess the relative performance and judgments made about forces in the PEEL programme, to ensure consistency and fairness; see paragraphs 243 - 250
National Police Chiefs' Council	body which replaced the Association of Chief Police Officers on 1 April 2015; it brings together operationally independent and locally accountable chief constables and their chief officer teams to help the police service coordinate operations (including operational responses to threats such as terrorism, organised crime and national emergencies), reform, improve and provide value for money; its primary decision-making forum is the Chief Constables' Council; it is underpinned by a collaboration agreement between chief constables, police and crime commissioners and non-Home Office force equivalents under section 22A, Police Act 1996
PEEL	the programme of annual inspections considering the efficiency, effectiveness and legitimacy of police forces and their operations; see paragraphs 145 - 147, 153, 173 and 187 <i>et seq</i>

police and crime plan	<p>plan prepared by a force's local policing body pursuant to section 7, of the Police Reform and Social Responsibility Act 2011 which sets out how the police, community safety partners and other criminal justice agencies will work together to reduce crime in the local area; it must cover the elected local policing body's police and crime objectives, the responsibilities of the chief officer, the financial and other resources which the elected local policing body is to provide to the chief officer to exercise his or her functions, the means by which the chief officer is to report to the elected local policing body, the means by which the chief officer's performance will be measured, the services to be provided by virtue of section 143 of the Anti-social Behaviour, Crime and Policing Act 2014 and any grants which the elected local policing body is to make under that section</p>
police and crime commissioner	<p>elected entity for a police area, established under section 1 of the Police Reform and Social Responsibility Act 2011, responsible for securing the maintenance of the police force for that area and securing that the police force is efficient and effective; holds the relevant chief constable to account for the policing of the area; establishes the budget and police and crime plan for the police force; appoints and may, after due process, remove the chief constable from office; see further <i>local policing body</i></p>
portfolio director	<p>senior civil servant (or equivalent) on the staff of the inspectorate with primary responsibility to HMIs for particular parts of the work of the inspectorate, namely (1) protection of vulnerable persons and joint inspections; (2) PEEL; (3) non-Home Office forces and the National Crime Agency; and (4) data collections and analytics, monitoring, research and evaluation, and inspection development</p>
PPOG	<p>police performance oversight group; the HMICFRS group chaired by HMCIC and comprising all HMIs together with representatives of the Home Office, the NPCC, the APCC and the College of Policing; meets up to four times a year to consider the performance of forces in Engage status and provide or facilitate the provision of support to them; see paragraphs 105 and 115 - 134</p>

regional HMI / regional inspector of constabulary	in relation to a force, the inspector of constabulary with principal responsibility for the inspection of that force
regional moderation	the process in which the regional HMI assesses the judgments made about forces in his or her area of responsibility and which have been inspected in the PEEL programme, to ensure consistency and fairness; see paragraphs 234 - 250
remedial plan	the plan for remedying causes of concern in respect of a force's performance, produced by the chief constable; see paragraphs 118 - 120
Scan	the status of a force which has not been escalated to Engage status in the inspectorate's monitoring process; see paragraphs 63, 86 - 97 and 130 - 134
senior responsible officer	member of the inspectorate with primary responsibility for an inspection or programme of work; see paragraphs 177 - 181 and 249 - 252
SRO	senior responsible officer
strategic briefing	briefing by the force, addressed to the inspectorate, at the beginning of an inspection, usually conducted by the chief constable and attended by the force's senior leadership team and senior members of the inspectorate; see paragraphs 203 - 205
super-complaint	a complaint made to HMCIC 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; complaints may only be made by bodies designated by the Home Secretary; if eligible, complaints must be investigated by one or more of the inspectorate, the College of Policing and the IOPC; so far, 16 bodies have been designated; see sections 29A – 29C of the Police Reform Act 2002
TAG	Technical Advisory Group
Technical Advisory Group	inspectorate group which advises on the best data and documents and methods by which the inspectorate obtains evidence for its inspections, and which comments on



	inspection questions to be used when inspections are designed; comprises members from outside the inspectorate, including the heads of performance analysis in several police forces, and representatives from the Home Office, the Office of National Statistics, the Association of Police and Crime Commissioners, the College of Policing and the Independent Office for Police Conduct; see paragraph 175
thematic inspection	an inspection according to a specified theme, into one or more major causes of concern or problem, usually at the instance of the Home Secretary, requiring an in-depth examination and assessment in a number of forces; see paragraph 137
value for money profile	for each force, a published annual set of information about the force's overall expenditure according to personnel and non-staff costs; its income from central government grant, council tax and reserves, and private sources; its costs of individual, specific policing functions; the composition of its workforce according to numbers of police officers (including their ranks) and other personnel, their spans of control and responsibility, length of service, sickness rates and turnover; volumes of crime, classified according to type; the results of police action; and circumstances in which no police action is taken; the principal purpose of the profile is the presentation of information which permits the inspectorate and others to make comparisons; see paragraphs 66 - 73 and 79
VFM	value for money
VFM profile	value for money profile
Workforce Development Group	a committee of the Board concerned with the skills of the inspectorate's staff; chaired by the inspectorate's chief operating officer