



Inspecting policing
in the **public interest**

Consultation on Her Majesty's Inspectorate of Constabulary's programme for regular force inspections

Summary

Introduction

In recent years, policing in England and Wales has undergone significant change. The institutions of the police have been through major reform. These changes include:

- the creation of directly elected police and crime commissioners (PCCs) to improve accountability;
- setting up the College of Policing to set standards, improve professionalism and develop a better understanding of what works;
- setting up the National Crime Agency to tackle serious and organised crime; and
- giving the Independent Police Complaints Commission (IPCC) more powers and resources.

The way in which HMIC supports police improvement has also changed and will continue to adapt to this new era of policing. We have become more independent of both government and the police service, and we are changing our approach to inspecting the 43 police forces in England and Wales, so that those holding the police to account – the public and PCCs – have a reliable, impartial and expert assessment of policing.

HMIC's PEEL inspection programme

HMIC will be carrying out a new annual programme of all-force inspections. The inspections will provide accessible, annual independent assessments of the performance of police forces. They will make it possible to see from a small number of easy-to-understand categories of police activity and assessment, how well police forces are performing.

The principal aims for the programme are to:

- improve effective democratic accountability;
- inspect in a way that leads to the greatest practicable appreciable improvement in policing services; and
- assist in identifying problems at an early stage and so reduce the risk of failure.

The focus of the programme will be on three principal themes:

- efficiency: how well police forces provide value for money;
- effectiveness: how well each force cuts crime; and
- legitimacy: how well each force provides a service that is fair and treats people properly.

The name for the new programme will reflect these themes. The inspections will be called Police Efficiency, Effectiveness and Legitimacy assessments, or PEEL assessments.

HMIC proposes the following principles to underpin the approach for PEEL assessments.

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

Assessment framework

HMIC will build on the existing monitoring framework in place for forces, basing PEEL assessments on a set of core questions. The questions will be grouped around the PEEL themes of efficiency, effectiveness and legitimacy, as set out below.

(a) Efficiency

1. Is the force maximising the efficiency of its operational resources?
2. Does the force have a secure financial position for the short and long terms?
3. Does the force have a sustainable workforce model for the comprehensive spending review period and beyond?
4. Does the force have the leadership capacity that it needs?

(b) Effectiveness

5. How effective is the force at reducing crime and preventing offending?
6. How effective is the force at investigating offending?
7. How effective is the force at protecting those at greatest risk of harm?
8. How effective is the force at tackling anti-social behaviour?
9. How effective is the force at tackling serious, organised and complex crime?
10. How effective is the force at meeting its commitments under the Strategic Policing Requirement¹?
11. How effective is the force at proactively ensuring public safety?

(c) Legitimacy

12. What are the overall public perceptions of the force?
13. How effective is the force at responding when a member of the public calls for service?

¹ *Strategic Policing Requirement*, HM Government, London, 2012

14. How well is the force meeting its responsibility to treat people equally and without discrimination?
15. Does the force's workforce act with integrity?
16. Are the data and information that forces provide about their work of a high quality?

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

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

Frequency and structure of inspections

Each force will be inspected and reported on twice each year as part of the PEEL programme.

- Inspection 1 will cover effectiveness. It will focus in detail on how effectively forces prevent and reduce crime, and how effectively they investigate crime in the context of the demand they face and local priorities.
- Inspection 2 will cover efficiency. It will consider how forces provide value for money, how they make best use of their resources to achieve the right outcomes for local communities, and whether their plans are sustainable in years to come.
- Both inspections will cover elements of legitimacy, along with organisational factors and local context.

The findings from the two inspections will then be combined to arrive at one full assessment.

We propose to produce a report after each inspection. These reports will then be brought together to provide annual assessments against the three themes, along with a view of the leadership and management of the force. We will use PEEL assessments and any additional inspection reports on specific subject areas of policing to provide a national overview.

Consultation questions

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

Making judgments and recommendations

HMIC proposes to use four judgments: two positive and two negative. Judgments will be made in connection with the three themes of efficiency, effectiveness and legitimacy.

The judgments reflect the terminology used by Ofsted. The Care Quality Commission has recently consulted on whether to adopt a similar model. The judgments will be:

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

We will publish criteria so that the way in which we arrive at judgments is clear. We will base judgment criteria on existing professional standards where they exist. Judgments will be accompanied by further information that will include comments on local context, and whether the force is improving or getting worse.

If a force is judged as inadequate against one of more of the themes, we propose the following steps.

- The force is automatically placed under formal review by HMIC's Crime and Policing Monitoring Group².
- Progress with resolving the problems identified should be monitored closely by the relevant Her Majesty's Inspector (HMI).
- Follow-up inspection work (and publication of the findings) might follow, even before the force is visited again as part of the next round of routine inspections. This will be at the discretion of the HMI, dependent on the nature of the problems found.
- Failure to make the necessary improvements would lead to escalation through the stages of the monitoring process (i.e. a letter to the PCC and, ultimately, referral to the Home Secretary).

² This is a group led by HMIC that keeps Home Office officials, representatives of chief constables and the Association of Police and Crime Commissioners informed about those areas that, in its professional judgment, might present significant risk to the public.

This approach could be implemented if the force is judged as inadequate in any of the three PEEL themes.

HMIC is committed to making recommendations when an assessment has identified there is a clear problem that needs to be addressed. We are also proposing to make recommendations in relation to areas that could be improved. As well as making recommendations to police forces, we propose to make recommendations to other bodies, such as the Home Office and the College of Policing, where issues that arise from inspections need to be addressed by those bodies.

We will also change the way we approach our inspections to reflect the way the police collaborate. It is right that in a tight financial climate, the police should exploit opportunities to join up with other organisations in the public, voluntary and private sectors – cutting out duplication and providing better, more efficient services to the public. HMIC will be mindful of collaboration arrangements in order to minimise inspection demands. HMIC will work closely with relevant partner inspectorates³ so that we are accurately identifying material issues before and after inspection.

- Q3. Do you agree with the proposal to use four categories for making judgments? If not, how could it be improved?**
- Q4. Do you agree with the proposed approach to those forces that receive a judgment of inadequate? How could it be improved?**
- Q5. Is there anything else that we should include in our recommendations to ensure that they lead to improvement?**
- Q6. Do you have any comments on our proposed approach to inspecting partnership and collaboration arrangements?**

³ For example: Ofsted, Care Quality Commission, HM Crown Prosecution Service Inspectorate, HM Inspectorate of Prisons, HM Inspectorate of Probation.

PEEL assessment practicalities

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

We will change the way in which we inspect so as to minimise any unnecessary demands on forces. This will include working with forces to make more data publicly available via force management statements⁴; using unannounced inspections where appropriate to minimise unnecessary or inappropriate preparatory work by forces; and using technology to ensure the management of data is efficient and minimises duplication.

We are committed to ensuring that the views of victims are fully reflected in each PEEL assessment in terms of how well forces meet the needs of their victims, and how forces develop their services in response to feedback from victims. Assessments will also consider how well forces adhere to the Code of Practice for Victims of Crime, which was published in October 2013 by the Ministry of Justice.⁵

HMIC will use a range of techniques to gather qualitative and contextual information, such as consulting focus groups and online forums. HMIC will engage with the voluntary sector to improve the quality of data collected and to help reach those victims who are less likely to engage with the police.

We are committed to ensuring good quality assurance processes are built into the PEEL assessment process at critical points. All inspections will be subject to robust moderation, ensuring that forces are assessed and judged consistently. This will include obtaining full and frank feedback from each force after each inspection to identify what worked well and what could be done better. We will be asking the public each year whether PEEL assessments provide them with the information they need to tell them how well their force is performing.

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

⁴ *Independent Review of Police Officer and Staff Remuneration and Conditions*, Cmnd 8024, 2012.

⁵ *Code of Practice for Victims of Crime*, Ministry of Justice, London, 2013.

Our reports will be presented in various formats in order to meet the range of needs of these different audiences. This will include a report summarising the principal deficiencies arising across all forces; content on our website that provides ready access to further detail; and short narratives for local media and interested parties such as local councillors. We will test them with a variety of people (including the public and police forces) as we develop them, so that they meet the needs of all our audiences.

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

The consultation

We need the views of the public, the police service and others as we develop our new approach to assessing the performance of the police.

If you would like to be involved, HMIC wants to hear from you.

This document is a summary of our proposed approach to the PEEL assessments. The full consultation document can be found at <http://www.hmic.gov.uk/publication/consultation-on-hmics-programme-for-regular-force-inspections/>

How to respond to this consultation

Please submit your answers to these questions, together with any other comments you may have, by email to haveyoursay@hmic.gsi.gov.uk no later than **Friday 12 September 2014**. If you prefer, you can post your responses to Chief Operating Officer, HMIC, 6th Floor, Globe House, 89 Eccleston Square, London, SW1V 1PN.

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

How consultation responses will be reviewed

HM Chief Inspector of Constabulary will consider respondents' views and, where appropriate, reflect the comments in the PEEL assessments as they are developed.

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

Our approach to disclosing responses is set out in Annex A of the full consultation document.