

Policing inspection programme and framework 2019/20

An inspection programme and framework under
Schedule 4A to the Police Act 1996

July 2019

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**Her Majesty's Chief Inspector of Constabulary's 2019/20
Inspection Programme and Framework**

**An inspection programme and framework prepared under
Schedule 4A to the Police Act 1996**

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Police Act 1996**

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Foreword

This document sets out our policing inspection programme and framework for 2019/20. It was approved by the Home Secretary under paragraph 2(2B) of Schedule 4A of the Police Act 1996 on 22 July 2019.

Annual all-force PEEL¹ inspections continue to be a cornerstone of our activity, but this year we are focusing on areas that present the greatest risk. In 2019/20, we are carrying out PEEL inspection work in a more integrated way. This means fieldwork will take place once a year in each force; the areas for inspection will be determined according to our assessment of risk.

Our assessment of risk draws on what we already know about each force, including our analysis of data and the results of previous inspections. We also draw on the information included in force management statements. These statements are designed to contain, in a common format, information reasonably required for the purposes of inspection. They enable us to make judgments as to the efficiency and effectiveness of a force while helping to identify the areas of the force's activities which present the greatest risk to the public. There is a mismatch between police funding and public expectation, and this is taken into consideration in the efficiency pillar of our PEEL inspections.

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

In 2019/20, we will continue to investigate super-complaints, the relevant regulations having been brought into force from 1 November 2018.

(Sgd.) Thomas P Winsor

Sir Thomas P Winsor

HM Chief Inspector of Constabulary

¹ PEEL: Police effectiveness, efficiency and legitimacy.

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services independently assesses and reports on the effectiveness and efficiency of police forces in the public interest.

We ask the questions which we believe the public wishes to have answered. We publish our findings, conclusions and recommendations in an accessible form, using our expertise to interpret the evidence. We provide authoritative information to allow the public to compare the performance of their police force against others, and to determine whether performance has improved or deteriorated over time. Our recommendations are designed to bring about improvements in the service the police provide to the public.

Introduction

This document is HMICFRS's inspection programme and framework for policing for 2019/20.

Types of inspection in 2019/20

PEEL assessments

PEEL is the inspection programme in which we draw together evidence from the annual, all-force inspections covering the effectiveness, efficiency and legitimacy of the police. The PEEL assessment provides graded judgments on forces' performance. Our PEEL assessments are designed to provide a regular and reliable assessment of how a force is performing, enabling the public to see how each police force's performance changes over time, and how it compares to the performance of other forces.

National thematic inspections

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

Commissions from the Home Secretary and local policing bodies

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

Similarly, local policing bodies may, at any time, ask us to carry out inspections or reviews of the police forces they oversee.

Inspection of national agencies and non-Home Office forces

In relation to policing, we have a statutory responsibility to carry out inspections of the following national agencies and non-Home Office forces:

- the National Crime Agency;
- the Police Service of Northern Ireland;
- the British Transport Police;
- the police forces of the armed forces;

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

As well as this, at the request of the relevant dependency or overseas territory, inspections may take place of forces in British Overseas Territories and Crown Dependencies, such as Gibraltar. Similar voluntary inspection arrangements are in place with the Gangmasters and Labour Abuse Authority.

Counter-terrorism and security-related inspections

We inspect the police response to certain national security threats. In 2019/20, this includes the police role in protecting national infrastructure and the response to a terrorist attack.

Joint inspections

We work with other organisations to conduct joint inspections. Joint inspections allow us to inspect the police response to a particular type of crime or problem as part of a wider assessment of the service provided by all the relevant agencies and organisations.

For instance, as part of our [joint targeted area inspections](#),² we work with Ofsted, the Care Quality Commission and HM Inspectorate of Probation to examine how local authorities, police, probation and health services work together to help and protect children.

We work most frequently with the other criminal justice inspectorates: HM Crown Prosecution Service Inspectorate, HM Inspectorate of Probation and HM Inspectorate of Prisons (HMIP). The joint inspection work we conduct with these inspectorates (which includes inspections of police and border force custody suites with HMIP) is detailed in the separate [Criminal Justice Joint Inspection Plan 2018/19](#), which was published in September 2018. The Criminal Justice Joint Inspection plan for 2019/20 is expected to be published in September 2019.

As in previous years, the chief inspector of constabulary will produce his annual State of Policing report, which reports on the efficiency and effectiveness of policing in England and Wales.

² These are short, focused inspections that are carried out on a multi-agency basis.

An overview of HMICFRS's inspection programme for policing 2019/20

PEEL programme

In previous PEEL assessments, we used the same set of methods to inspect each of the 43 forces. In 2018, we moved to an integrated approach to PEEL assessment, as explained later in this document. This approach will continue and be refined as it matures.

As in previous years, forces will be assessed and given graded judgments. The gradings for the 2019 PEEL inspections are the same as in previous years: outstanding, good, requires improvement and inadequate.

We will continue to acquire information using methods that include:

- analysis of documents and data;
- reviews of case files;
- surveys of the public and others;
- interviews;
- focus groups;
- observations of police practice; and
- force management statements (as to which see later in this document).

National thematic inspections and rolling programmes

Some elements of planned thematic inspections for 2019/20 may be integrated into the PEEL all-force inspection programme; some may also be included in the Criminal Justice Joint Inspection Plan. It is important to note that thematic inspections are still an essential part of our programme of work and will continue to take place alongside the PEEL inspections.

Our thematic inspections in 2019/20 include senior leadership selection and development,³ counter-terrorism, older people⁴ in the criminal justice system, and cyber-crime. We will also continue our rolling programmes on child protection, Youth Offending Teams and crime data integrity. Crime data integrity inspections assess whether police forces record and categorise crimes correctly. This current programme of inspection is due to finish this financial year. We started thematic work on county lines⁵ and TACT (Terrorism Act custody suites) in 2018/19.

We have been asked by the Home Office to resume a programme of inspections into the use of the police national computer by non-police organisations. We will continue our work with the Home Office to explore options for a risk-based approach to these inspections.

Vulnerability and child protection inspections

Protecting vulnerable people is a fundamental part of policing. We assess the police response to threats to and crimes against vulnerable people in several of our inspection programmes, including thematic inspections and through specific questions in the PEEL inspections. We have committed to review and report on forces' response to domestic abuse every year. We inspect as part of the integrated PEEL programme, and in addition to publishing an annual report we also report on a quarterly basis to the Home Secretary's National Oversight Group on Domestic Abuse.

We also have two rolling child protection programmes:

- Our national child protection inspections examine the effectiveness of the police at each stage of their interactions with or for children, from initial contact and early identification of children who are at risk, through to investigation of offences against them. The inspections also include scrutiny of the treatment of children in custody, and assessment of how the force is structured, led and governed in relation to child protection services.

³ For the senior leadership and development inspection we will examine the processes by which candidates for advancement to chief officer are selected (including the senior police national assessment centre) and the training course they undergo before promotion to assistant chief constable (the strategic command course).

⁴ The population of England and Wales is ageing. While research shows that older people are less at risk of crime overall than other groups, some crime types – such as those linked to physical, mental, or financial abuse – disproportionately affect older people. The average age of victims of scam mail, for example, has recently been put at 74 years. So we consider this inspection to be important and will assess, for the first time, the police and CPS responses to these and other offences affecting older people.

⁵ 'County lines' is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns, using dedicated mobile phone numbers known as 'deal lines'.

In 2019/20 there will be six new inspections, as well as re-inspections or re-visits of some forces. Inspections also collect evidence about emerging or new areas of concern (such as the use of children in county lines offending).

- We work with Ofsted, the Care Quality Commission and HM Inspectorate of Probation to examine how English local authorities, police, probation and health services work together to help and protect children. Eight new joint targeted area inspections (JTAs) will be carried out in 2019/20. We will also continue to work towards a pilot JTA in Wales.

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

In 2019/20 we have published the results of our inspection regarding crimes against older people, and will publish our report into the use of evidence-led prosecutions in domestic abuse cases. Both these inspections have been conducted jointly with HM Crown Prosecution Service Inspectorate. We will also conduct several other joint inspections; these will be confirmed later in the year.

Inspection of national agencies and other non-Home Office forces

Subject to further discussion with the organisations concerned, in 2019/20 we intend to carry out inspections of:

- the National Crime Agency;
- the Police Service of Northern Ireland;
- the British Transport Police;
- the police forces of the armed services;
- the Ministry of Defence Police;
- the Civil Nuclear Constabulary;
- Her Majesty's Revenue & Customs;
- the Gangmasters and Labour Abuse Authority; and
- some police forces in British Overseas Territories (particular territories yet to be determined).

Super-complaints

The Policing and Crime Act 2017 established a new system of police super-complaints.

A super-complaint is a complaint, made to HM Chief Inspector of Constabulary, that a feature, or combination of features, of policing in England and Wales by one or more than one police force is, or appears to be, significantly harming the interests of the public. Super-complaints can be made about in respect of any one or more of the 43 police forces in England and Wales, the National Crime Agency, the Ministry of Defence Police, the Civil Nuclear Constabulary and the British Transport Police.

Only a body designated by the Home Secretary may make a super-complaint. The legislation provides for the Home Secretary to decide which bodies may be designated, and the criteria to be applied in making such decisions. Sixteen bodies were designated in June 2018.

Although each super-complaint must be made first to HM Chief Inspector of Constabulary, HMICFRS will decide with the College of Policing and the Independent Office for Police Conduct (IOPC) whether it is eligible for consideration. If it is, we will jointly investigate the super-complaint and then representatives from HMICFRS, the College of Policing and the IOPC will consider what action should be taken, if any, in response. The outcomes could include:

- an inspection by HMICFRS;
- an investigation by IOPC;
- changes to existing policing standards or support materials from the College of Policing;
- a recommendation that another public body is better placed to deal with the issue;
- a recommendation to one or more police forces to change practices or local policies;
- a recommendation to another public body or government department to take action to respond to the super-complaint or a related matter;
- finding the super-complaint needs no action; or
- finding the super-complaint is unfounded.

Since the system went live on 1 November 2018, HM Chief Inspector of Constabulary has received three super-complaints.

Liberty and Southall Black Sisters have jointly made a super-complaint about the police passing victim and witness data to the Home Office for immigration purposes. We are now investigating this super-complaint.

The Centre for Women's Justice has made a super-complaint about police use of protective measures in cases of violence against women and girls. This super-complaint is now being assessed to establish its eligibility to be investigated.

Hestia has made a super-complaint about the way police treat victims and survivors of modern slavery and trafficking. This super-complaint is now being assessed to establish its eligibility to be investigated.

We expect to receive further super-complaints during 2019/20.

[Further information about super-complaints is available on the super-complaints section of gov.uk.](#)

Inspectorate capacity

This inspection programme and framework is predicated on there being a full complement of inspectors of constabulary, working full-time on the affairs of the inspectorate, during the inspection year in question. To the extent that this is not the case, and subject to the requirement for consultation specified below, this inspection programme and framework will have effect for such period and with such modifications as the chief inspector of constabulary shall specify and publish.

Before the chief inspector of constabulary makes any such modifications, he must first have consulted the Home Secretary and those local policing bodies and chief officers, and such other law enforcement bodies and policing institutions, as he considers likely to be affected by the modifications he proposes to make, and have taken into consideration their observations and representations timeously made.

HMICFRS's inspection framework

Integrated PEEL assessments

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

We received a number of responses to our public consultation that identified particular crime types as emerging risks. We will use these responses to inform the design of our PEEL question set.

The purpose of our PEEL inspections is to facilitate improvements in the police service. Integrated inspections allow us to achieve this more effectively, by focusing on those aspects of forces' work which we determine present the greatest risks to the public.

This year, we have successfully introduced a risk-based approach to our inspection methodology. This has allowed us to reduce significantly the amount of fieldwork we are conducting in well-performing forces.

By making greater use of the knowledge we already have about each force, we have targeted our fieldwork activity at those areas of greatest concern. Our sources of information include:

- information from continuous monitoring;
- more regular data collection;
- other evidence collected outside the main inspection fieldwork; and
- self-assessments provided by forces in their force management statements.

In our first year of integrated PEEL inspections, we have reduced by just under a third overall the number of questions that are subject to fieldwork. Dependent on the level of risk, forces have fieldwork on between four and ten questions overall. All forces are subject to fieldwork on four principal questions and the remaining six questions are risk-assessed.

Until this year, PEEL inspections had been carried out at different times during the year, with the three PEEL pillars – efficiency, effectiveness and legitimacy – each having their own fieldwork and evidence-gathering processes. In 2019/20, PEEL fieldwork is being carried out once in each force and will gather evidence in relation to each of the PEEL pillars simultaneously. This will involve activity in relation to all three PEEL pillars.

The resulting judgments and reports will continue to provide regular, easy-to-understand assessments of police forces. Some changes have been made to the methodology of our inspections, but comparisons with PEEL assessments from previous years are still possible. We are also better able to relate evidence found in one pillar with the outcomes and effects in another. In this way, we can connect the independent pillars to the overall performance of each force.

We plan to start inspection fieldwork for the second year of integrated PEEL assessments in autumn 2019.

Force management statements

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

FMSs will cover, for each of the following four years, the chief constable's evaluation and projections in relation to:

- the full range of demand (crime and non-crime, latent and patent) which the force is likely to face;
- the condition, capacity, capability, serviceability, performance and security of supply of the force's workforce and other assets, such as ICT;
- the force's plans to improve its efficiency; and
- the force's income.

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

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

In these and other respects, local accountability of forces is enhanced and made more effective.

We have reviewed the first FMSs from all forces and evaluated feedback from forces and others in relation to the first generation of FMSs. The current version, FMS 2, retains the format and structure of FMS 1. The template for FMS 2 was provided to forces early in the planning cycle, so as to enable forces to harmonise the FMS process with their financial and other plans. In view of the latitude given to forces for their FMS 1s, there was a considerable variation in how forces provided the necessary information to us. As we said when we began the FMS process, the format for FMS 2 is more prescriptive than for FMS 1, and as well as benefitting from the best of the first generation of FMSs, the FMS 2s achieve a greater degree of consistency, enabling better comparability and higher quality information.

To ensure the development of the formats for FMS 3 and beyond continues to improve the instrument, a steering group of interested parties has been established. It consists of representatives from HMICFRS, the College of Policing, the National Police Chiefs' Council, the Association of Police and Crime Commissioners, the Home Office, the Police Federation of England and Wales, the Police Superintendents' Association of England and Wales, Unison, and others. We are most grateful to all concerned for their constructive engagement in this work.

Inspectorate management statement

This year we are producing our first inspectorate management statement (IMS). The IMS will establish our best estimate of HMICFRS's future demand, performance, resources and capability, so that we are better able to plan for what will be required of us, and continue to improve our efficiency with expected financial resources. It will also help us establish priorities amongst competing demands.

Local policing bodies' priorities

In the design of each inspection, and before carrying out fieldwork in each force, we examine and review in detail the local policing body's police and crime plan for the force, in order to be clear on its established local priorities. The police and crime plan is also used as a material source of information about the local circumstances and characteristics of the force, the police area in question, and the factors which affect considerations of public protection, crime and disorder, including demand – latent and patent – for police services.

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

College of Policing standards

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

Methodology, monitoring, assurance and analysis

HMICFRS's monitoring process

HM Inspectors of Constabulary (HMIs) routinely and continuously monitor all police forces to promote improvements in police practice. If an HMI identifies a cause of concern about police practice, it is raised with the chief constable and the local policing body, so they can take action.

We are continuing to improve the monitoring process to make better use of our insights into police performance and the differing contexts in which services are provided. This includes improving the integration of monitoring with the Integrated Peel Assessment programme and our risk-based approach. [For more information about our approach to monitoring, please visit our website.](#)

Follow-up from previous inspections

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

For this year's PEEL programme, we reduced by a third the number of questions we sought to answer in the inspections, and we carried out integrated, single inspections in each force rather than separate inspections. We will continue to use evidence from previous inspections to ensure, as far as practicable, that we are not asking the same question of a force more than once.

HMICFRS's knowledge, information and digital strategy

We use a significant amount of data and information from a wide range of sources. In 2019/20, these include force management statements and Home Office data, as well as data provided by forces in response to our other formal requests.

We continue to ensure we manage this information effectively and securely, re-using and exploiting it where we can. This requires a mix of new processes and tools, and better use of existing systems.

Data management

Use of 'big data' software

We have been working with the National Police Chiefs' Council and more than half the forces in England and Wales to develop better and more efficient ways to collect, analyse and report information. Rather than use traditional data collection forms, which can be labour-intensive to complete and slow to process, this project has used a 'big data' approach.

This system has been tested using forces' operational command and control data. These data are processed using the latest cloud-based software, Microsoft Power BI, which provides dashboard-style analytics to staff at the pilot forces and at HMICFRS. The system has recently been accredited as secure by the Home Office and is to be introduced to all forces and local policing bodies in due course.

The purpose of providing this facility is to help us target the areas of greatest risk and to facilitate forces' addressing of the risks identified. The system provides detailed information about each force, but to that force only. For instance, it can show where different types of incident occur, their volumes and whether these incidents have changed over time. It can also show which incidents consume the most staff response time. However, although each force can only access its own detailed analysis, every force has access to comparative information. These comparisons will help forces assess their performance and policy choices: for example, where to strike the balance between fast response times and higher levels of attendance for different types of incidents.

[Our 2018 value for money profiles have been published on our website using the same system.](#)

By using this software we are able to show, for each force, trends over several years as well as a comprehensive and highly detailed analysis of each force's comparative funding, income, expenditure and performance.

HMICFRS's assurance obligations

As well as our statutory obligations to inspect and report on the efficiency and effectiveness of police forces and certain other bodies, we are obliged to monitor and provide assurance about other aspects of policing. These include matters such as compliance by chief officers with the requirements of the [Police National Database statutory code of practice](#), and the [Strategic Policing Requirement](#). We continue to conduct monthly reviews at force level to monitor statistics relating to the usage of the Police National Computer. In 2019/20, we are undertaking work to assess how police forces discharge their obligations to have regard to the *Strategic Policing Requirement*. This work will include our child protection rolling inspection programmes.

Advisory and reference groups

We regularly convene reference groups and advisory groups involving experts who have specific skills and experience in the areas that are inspected. We use their knowledge and advice to establish a sound methodology for inspections.

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

Our Technical Advisory Group (TAG) helps to design inspection programmes, so they are as effective and efficient as possible. TAG members include representatives of the National Police Chiefs' Council, the Association of Police and Crime Commissioners, the offices of police and crime commissioners, the College of Policing, the Home Office, the Office for National Statistics, staff associations, police forces and other specialist agencies.

Our Academic Reference Group (ARG) provides expert advice and discussion on the design and ethical considerations of new research projects which support inspections, the development of methodologies and the evaluation of inspection methodologies and outcomes. The ARG members include academics from several universities with specialities in policing, research leads from other inspectorates (including the Care Quality Commission, Ofsted and HMI Probation) and the Home Office, and research leads from other policing bodies including the College of Policing and the Police Foundation.

We also have other programme-specific reference groups covering, for example, the overall approach to integrated PEEL and inspections, such as child protection and crime data integrity.

We received consultation responses asking us to consider using more public input when establishing our inspection methodology; as far as practicable, we will do so.