

Policing inspection programme and framework 2021/22

For consultation

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

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

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

Foreword

We are still operating in extraordinary times.

Despite the country and many lives being on hold, the work of HMICFRS goes on, to promote improvements in policing, to keep people safe and reduce crime and disorder. However, we must do so in a way that is very different to what has gone before.

Our police effectiveness, efficiency and legitimacy (PEEL) programme has restarted. It is moving over to the continuous assessment model that we explained in our 2020/21 policing inspection programme and framework. The areas we will inspect as part of the programme will be the same as those in the 2020/21 programme and are aligned, where possible, with the structure of the service-wide template force management statement¹ (FMS).

As the inspectorate continues to move into a post-pandemic world, we will reflect on how we operated during the pandemic and what improvements we can make to future inspections. For now, the safety of our staff and those we inspect remains paramount. We will adapt our inspection processes as local and national conditions require.

Thank you for your interest in our proposed inspection plans for 2021/22. Your response to this consultation will help make sure that we continue to focus our inspection work on what matters most to the public.

¹ A force management statement (FMS) is a self-assessment that chief constables (and London equivalents) prepare and give to HMICFRS each year. It is the chief constable's statement and explanation of:

- the demand the force expects to face in the foreseeable future;
- the performance, condition, composition, capacity, capability, serviceability and security of supply of the force's workforce, and the extent to which current force assets will be able to meet expected future demand;
- how the force will change and improve its workforce, policies, practices and other assets to cope with future demand;
- the effect those changes are expected to have and the effect of any residual risk of service failure; and
- the money the force expects to have to do all this.

Consultation questions

This document provides details of our proposed programme of policing inspections for 2021/22. It asks for your views on whether we cover the right themes and areas of policing. In particular, we are seeking your responses to the following consultation questions:

1. Do these proposed thematic inspections cover those areas that are of most concern to you at the moment?
2. Are there any significant new or emerging problems in policing that HMICFRS should take into account in its inspection activity?
3. How else could HMICFRS adapt the way in which it acquires information to take account of current circumstances and risks to public safety?

These questions are repeated in the body of this document. At the end of the document, we explain how you can let us have your views.

Introduction

This document is HMICFRS's inspection programme and framework for policing for 2021/22.

Types of inspection in 2021/22

PEEL assessments

The PEEL inspection programme is an [assessment of the effectiveness, efficiency and legitimacy of police forces in England and Wales](#). Its principal aim is to promote improvements in policing. Our PEEL assessment provides graded judgments on a number of aspects of forces' performance. It identifies where forces need to improve and helps the public understand how well their force is performing.

National thematic inspections

Our thematic inspections are in-depth examinations of particular policing practices or processes, or of the policing approach to preventing and tackling specific offences. Themes are identified through our continuous monitoring and they are generally chosen because:

- current acute problems in policing practice are harming the public interest;
- there are inconsistencies in outcomes across England and Wales, which force-level work cannot adequately explain; or
- further improvement in practice would benefit the most (or the most vulnerable) victims.

Expanding on the force-specific information from PEEL inspections and FMSs, inspectors build a national picture of police effectiveness in the selected areas through a combination of:

- all-force data and document requests;
- interviews with national, regional and local policing bodies, government and other interested parties;
- case file audits and testing the understanding and application of policies and procedures with operational staff in forces; and
- a victim, offender or witness focus.

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.

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 other non-Home Office forces

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 Armed Forces Police – Royal Military Police, Royal Navy Police and Royal Air Force Police;
- the Ministry of Defence Police;
- the Civil Nuclear Constabulary; and
- HM Revenue & Customs.

Also, 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, Jersey and Guernsey. Similar voluntary inspection arrangements are in place with the Gangmasters and Labour Abuse Authority. We also conduct audits of the Police National Computer.

Joint inspections

We work with other organisations to conduct joint inspections. Such inspections allow us to inspect the way in which the police approach and tackle 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, we work with Ofsted, the Care Quality Commission (CQC) and HM Inspectorate of Probation (HMI Probation) to examine how local authorities, police, probation and health services work together to help and protect children.

We work most often with the other criminal justice inspectorates: HM Crown Prosecution Service Inspectorate, HMI Probation and HM Inspectorate of Prisons. This allows us to assess police efficiency and effectiveness in both contributing to, and being affected by, the wider criminal justice system. The joint inspection work we conduct with these inspectorates is detailed in the separate criminal justice joint inspection plan. The 2021/23 plan will be published shortly.

State of Policing report

As in previous years, HM 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.

An overview of HMICFRS's inspection programme for policing 2021/22

PEEL programme

In 2020, we consulted on our revised PEEL programme and our new continuous assessment model. The inspection programme was then paused due to the pandemic. It restarted in October 2020.

Our PEEL assessment will include both continuous assessment and formal reporting on every force. This will include graded judgments based on everything we know about that force up to the point that we make our judgments. We will produce such judgments every two years.

National thematic inspections and rolling programmes

Some elements of planned thematic inspections for 2021/22 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 alongside the PEEL inspections.

Our proposed thematic inspections include:

- rape;
- domestic abuse;
- digital forensics;
- advancing equality, diversity and inclusion in policing;
- ethnic disproportionality in the criminal justice system; and
- serious youth violence.

Consultation question

Do these proposed thematic inspections cover those areas that are of most concern to you at the moment?

Vulnerability and child protection inspections

Protecting vulnerable people is fundamental to policing. We assess the police's approach to tackling 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 also have three rolling child protection programmes as follows:

National child protection inspections (England and Wales)

Our national child protection inspections examine the efficiency and 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. These offences include child sexual abuse and exploitation, online offending, and neglect. We also examine cases of children present at the scenes of domestic abuse, and those who are in custody. The flexible methodology and specialist inspection team allows us to include assessments of areas of child protection practice that are of particular interest or concern to a force, national policing or government. For instance, in recent years we have increased our inspection of criminal exploitation cases, and of the ways in which the police tackle the incidence of indecent images of children.

We don't make graded judgments in these inspections, but our reports give forces a detailed blueprint for recommended efficient and effective practice. We describe the strengths they should build on and where they can improve. A follow-up programme allows us to track progress, while support and engagement from our team before, during and after each inspection makes sure that forces understand our approach.

In 2021/22, we will conduct six inspections, four re-inspections and further follow-up work. We will publish a separate report collating and expanding on our findings on the police approach to preventing and tackling online child sexual abuse and exploitation.

Joint targeted area inspections (England)

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.

As well as examining the efficiency and effectiveness of these child protection partnerships from the perspective of the children referred to them, each cohort of six inspections has a 'deep dive' theme. In 2021/22, these themes are likely to be domestic abuse, and the exploitation of children. The final plans will be confirmed as each of the inspectorates returns to routine inspections.

We will communicate these thematic findings – for example, through national and regional events, reports and close work with other inspectorates – to ensure that all forces can consider common themes and take action as needed.

Joint inspection of child protection arrangements (Wales)

We work with the Care Inspectorate Wales, Healthcare Inspectorate Wales, Estyn (the education and training inspectorate for Wales) and HM Inspectorate of Probation to examine how Welsh local authorities, police, probation and health services work together to help and protect children.

This new inspection programme shares with the (England-only) joint targeted area inspections a focus on the experiences of children as a way of assessing the effectiveness of partnership working. However, the methodology and approach are tailored to the context and different partnership arrangements and responsibilities in Wales.

A pilot inspection was carried out in December 2019. In 2021/22, we will conduct a further two pilots and one substantive inspection.

Violence against women and girls

We inspect the police's approach to tackling and preventing crimes which disproportionately affect women and girls, as part of several of our inspections. This includes PEEL, and our child protection inspection programmes (in which we consider the experiences of girls who are victims of abuse and exploitation).

In 2021/22, we plan to publish spotlight or thematic reports on how the police tackle domestic abuse and rape. We will also continue to monitor progress made by policing against recommendations from our previous thematic inspections of the police approach to tackling [harassment and stalking](#), and [honour-based violence, forced marriage and female genital mutilation](#).

Home Secretary commission on police engagement with women and girls

In March 2021, Her Majesty's Chief Inspector of Constabulary received a commission from the Home Secretary, under section 54(2B) of the Police Act 1996, to conduct an inspection of the quality and effectiveness of interactions between the police and women (whether as victims, offenders or witnesses), with a focus on the experiences of women and girls.

Inspection of national agencies and other non-Home Office forces

Subject to further discussion with the organisations concerned, in 2021/22 we intend to carry out inspections of the following:

- HM Revenue & Customs;
- the police forces concerned with the armed services;
- the National Crime Agency;
- the British Transport Police;
- the Gangmasters and Labour Abuse Authority;
- the Police Service of Northern Ireland;
- one or more threat areas specified in the *Strategic Policing Requirement*; and

- police forces in British Crown Dependencies (Isle of Man Constabulary) and British Overseas Territories (Sovereign Base Areas Police (Cyprus) and one further territory 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 police forces is, or appears to be, significantly harming the interests of the public. Super-complaints can be made 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. Sixteen such bodies were designated by the Home Secretary 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 investigation. If it is, we will jointly investigate the super-complaint and representatives from HMICFRS, the College of Policing and the IOPC will then consider what action, if any, should be recommended. 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 concern;
- 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.

We expect to receive further super-complaints during 2021/22. Based on the experience of the first five super-complaints, these may each be on very different topics, and (if established to be eligible) will require very different investigations.

The Home Office has provided funding in 2021/22 for the team that considers the eligibility of complaints and runs the secretariat for the programme. However, we are not resourced to do any work beyond this (such as investigating further super-complaints, or any further inspection activity recommended in current investigations). This work is therefore not included in this consultation.

HMICFRS's inspection framework

PEEL programme

The PEEL inspection programme is an [assessment of the effectiveness, efficiency and legitimacy of police forces in England and Wales](#).

In 2021/22, we will continue the development of the PEEL programme, implementing an intelligence-led continuous assessment model. This means making greater use of the breadth of evidence we already collect on each force throughout the year to come to an assessment of performance. Evidence sources include:

- the relevant police and crime plan;
- the relevant force management statement;
- findings from thematic and joint inspections;
- crime data integrity inspections;
- progress against established causes of concern² and areas for improvement³;
- routine data collections;
- knowledge gained through regular liaison between the force and the inspectorate; and
- evidence collected through regular engagement with the force, in order to gain insight into its activities.

There will be less reliance on an intense annual on-site fieldwork period, with the intelligence-led approach determining the need to collect further evidence during this period.

In the PEEL inspection programme, we will continue to use evidence collection methods, including:

- analysis of documents and data;
- reviews of case files;
- surveys of the public and others;
- interviews;
- focus groups; and
- observations of police practice.

² Causes of concern – if HMICFRS's inspection identifies a serious or critical shortcoming in a force's practice, policy or performance, it will be reported as a cause of concern.

³ If HMICFRS's inspection identifies an aspect of a force's practice, policy or performance that falls short of the expected standard, it will be reported as one or more area(s) for improvement.

During the pandemic, we used remote methods of inspection. We have evaluated our approach, and a blend of those face-to-face and remote methods that have been found to be most effective will be used in future PEEL inspections.

The areas of policing we inspect, based on 12 principal questions (called 'core questions'), will remain the same as those stated in our 2020/21 programme and inspection framework.⁴ These are aligned, where possible, with the structure of the service-wide template force management statement.

We will inform a force of a cause of concern as soon as we identify one. This could trigger monitoring activity sooner and help forces improve their own performance by taking rapid action. It will support local policing bodies in holding their chief constables to account and assist the public in holding their local policing bodies to account.

When we discover a significant service failure that is putting public safety at risk, we may also (in certain circumstances) publish a cause of concern and recommendations as soon as possible. We intend to release this information on our website.

Consultation question

Are there any significant new or emerging problems in policing that HMICFRS should take into account in its inspection activity?

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 that affect considerations of public protection, crime and disorder, including demand – latent and patent – for police services.

⁴ In relation to each force, the 12 core questions are concerned with:

1. the quality of the service the force provides to victims of crime;
2. the quality of the force's engagement with the people it serves and the extent to which they are treated fairly, appropriately and respectfully;
3. the quality of the force's work to prevent and deter crime and anti-social behaviour, and its work in respect of vulnerable members of the public;
4. the force's response to the public;
5. the quality of the force's investigation of crime;
6. the quality of the force's protection of vulnerable people;
7. the management of suspects and offenders;
8. the force's work to disrupt serious and organised crime;
9. the quality of the force's compliance with the *Strategic Policing Requirement*;
10. the quality of the force's work to protect communities against armed threats;
11. the establishment, development and care of its workforce, including in respect of an ethical and inclusive working environment; and
12. the efficient planning and management of the force, and the extent to which it achieves and is likely to achieve value for money.

Each force's force management statement must be sensitive to, and reflective of, local conditions and circumstances. It 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 great importance to the improvement of policing and the achievement of consistency in practice. We always consider the College's current standards in the design of inspections and our assessments of forces.

Methodology, monitoring, assurance and insight

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 that they can take action.

Consultation question

How else could HMICFRS adapt the way in which it acquires information to take account of current circumstances and risks to public safety?

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). We also track the progress that forces have made against the recommendations in our reports.

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 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's 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.

Advisory and reference groups

We regularly convene advisory and reference 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.

We draw members 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 that 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 HM Inspectorate of Probation), the Home Office, and other policing bodies, including the College of Policing and the Police Foundation.

We also have other programme-specific reference groups covering, for example, our overall approach to PEEL inspections and specific aspects 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.

How to respond to this consultation

Please submit your answers to these questions, together with any other comments, by email to: HMICFRSPolicingInspectionProgrammeandFramework@hmicfrs.gov.uk no later than 1700 on Tuesday 18 May 2021.

If you prefer, you can post responses to the Chief Operating Officer, HMICFRS, 6th floor, Globe House, 89 Eccleston Square, London SW1V 1PN. Please clearly mark your response 'CONSULTATION RESPONSE'.

If you have a complaint or comment about HMICFRS's approach to consultation, you can email this to:

HMICFRSPolicingInspectionProgrammeandFramework@hmicfrs.gov.uk

How consultation responses will be reviewed

HM Chief Inspector of Constabulary will consider respondents' views and, if he determines it appropriate to do so, change the proposed inspection programme and framework before putting it to the Home Secretary for approval. In accordance with the Police Act 1996, Schedule 4A, paragraph 2, HM Chief Inspector of Constabulary must obtain the approval of the Secretary of State before publishing the inspection programme.

[The final document, which will be appropriately revised to reflect the results of consultation, will be made available on HMICFRS's website.](#)

You should note that HMICFRS may publish consultation responses, or summaries of them, except where they have been provided in confidence. Please indicate in your response if you do not wish it to be published.

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