

PEEL 2020/21 consultation

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The new approach to all-force inspections

The PEEL inspection programme is an [assessment of the effectiveness, efficiency and legitimacy of police forces in England and Wales](#). In 2018, HMICFRS developed its approach to PEEL with the introduction of the Integrated PEEL Assessment (IPA) programme. This brought together the three PEEL pillars (effectiveness, efficiency and legitimacy) into a single inspection. We also introduced a risk-based approach, to concentrate on areas of the greatest risk.

HMICFRS plans to continue the evolution of PEEL in 2020/21 towards an intelligence-led continuous assessment model. This means making greater use of the breadth of evidence HMICFRS already collects on a force throughout the year to come to an assessment of performance. Evidence sources include:

- force management statements;
- findings from thematic and joint inspections;
- crime data integrity inspections;
- progress against causes of concern and areas for improvement;
- routine data collections;
- force liaison lead knowledge; and
- insight evidence collection.

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

This will provide HMICFRS with a more dynamic view of current force performance across a range of policing functions. Causes of concern will be highlighted to a force as soon as they are identified, not just as part of the PEEL onsite evidence collection. This could trigger monitoring activity sooner and help forces improve their own performance by taking rapid action where improvement is needed. 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.

Previously, when we have identified a cause of concern as part of a PEEL inspection, we have alerted the relevant police force(s) immediately so that remedial action can be taken. However, we have not reported that cause of concern and the associated recommendations more publicly until we have published the full force report. This can be some months after we initially uncovered the concern. In PEEL 2020/21, in order to better inform the public, we will immediately alert the police force when we discover a significant service failure that is putting public safety at risk. In certain circumstances, we may also then publish a cause of concern and recommendations as soon as practicable thereafter. We intend to release this information via an update to the

HMICFRS website. The full evidence base and background to the cause of concern will be covered in the force's next report, as will an update on the progress made against it. We do not propose to publish all causes of concern this way – only those immediately related to public safety. Other causes of concern (for example, those that relate to the organisation and running of the force) will be published in the force's report in the usual way.

HMICFRS will continue to publish a formal assessment and a report for each force during a PEEL cycle. This will be based on everything known about that force up to the point that we make our judgments.

We will aim to report on a force in public as soon as possible after the conclusion of onsite evidence collection. This means that we will no longer publish in set tranches: force reports will be published as soon as they are ready.

The principal aims of this approach will be to:

- contribute to improvements in policing;
- highlight problems at an early stage to reduce risk of failure; and
- improve effective democratic accountability.

HMICFRS currently assesses, judges and reports under the three separate PEEL pillars of effectiveness, efficiency and legitimacy. It is proposed that the structure of the PEEL assessment framework should be changed so that it better matches:

- the way police forces are organised;
- the demands they face; and
- the outcomes the public and their elected representatives justifiably expect of them.

HMICFRS proposes a high-level structure for the PEEL assessment framework that:

- better aligns the areas inspected (core questions) with force management statement demand categories;
- assesses the force's efficiency, legitimacy and effectiveness across each core question, to enable a rounded view of how well a force is performing in a specific area of policing; and
- allows assessments that consider factors that cut across core questions, or that are provided at a force level.

Using these principles, our proposal is that the PEEL assessment framework should be structured to focus on three principal areas:

- an **operational assessment** – how well services are provided;
- an **organisational assessment** – how well the police force is run; and
- a **service user assessment** – the outcome from the perspective of those receiving the services.

The **organisational assessment** considers factors that cut across core questions or are provided at a force level.

The **operational assessment** is the operationally focused core questions grouped together.

The **service user assessment** incorporates core questions relating to procedural justice and public treatment. It also includes a new victim service assessment (VSA), which looks at the service standards provided to and experienced by a victim of crime – from point of contact to outcome. The VSA incorporates the crime file review (as in previous PEEL inspections) and on a tri-annual basis it will include crime data integrity (CDI), which will become part of PEEL in 2020.

The proposed structure is summarised below:

Area	Components
Organisational assessment	<ul style="list-style-type: none"> • Strategic planning, organisational management and value for money • Workforce
Operational assessment	<ul style="list-style-type: none"> • Preventing and deterring crime and anti-social behaviour • Responding to the public • Investigating crime • Protecting vulnerable people • Managing offenders and suspects • Serious and organised crime • Strategic Policing Requirement and specialist capabilities
Service user assessment	<ul style="list-style-type: none"> • Victim service assessment (including crime data integrity) • Procedural justice/public treatment assessment

Characteristics of good performance (which are comparable to the ‘Good’ element of our judgment criteria in previous years) have been identified for each core question to assess whether a force is performing well. These are based on recognised good practice, research evidence, and advice from senior leaders and practitioners. However, as with previous IPA and PEEL judgment criteria, they are not intended to be prescriptive or exhaustive.

The areas we will inspect in PEEL 2020/21 are broadly based on the current areas of inspection. However, they have been updated to:

- reflect current priorities, risks and standards;
- enable an assessment of effectiveness, efficiency and legitimacy in a specific area of policing; and
- increase the focus, where feasible, on outcomes and what matters to the public (better balance of outcomes versus process).

We have consulted extensively with external reference groups and national professional leads to develop the question set in the PEEL assessment framework. We are seeking further views as part of our public consultation. The proposed question set is included at the end of this document.

Force context

HMICFRS has identified the need for better appreciation of the contextual factors that can have an effect on force performance. Our definition of a force's context is: "The group of factors which affect a force's performance, over which it has no (or very indirect) control." These factors can include:

- the force's income, and the balance between income from central government and council tax precept;
- the socio-economic status of the force area population;
- other demographics of the force area population, such as age;
- the rurality of the force area;
- the transport network in the force area; and
- the performance of other local services, such as schools and children's services, hospitals and mental health services.

In PEEL 2020/21, we will focus on understanding the effect of funding and demand on force performance. In the longer term, we will consider the effects of wider contextual factors on force performance.

Victim service assessment

As part of our development of PEEL, we propose to introduce an assessment focused on the experience of the service provided by forces to victims of crime. This will be known as a 'victim service assessment' (VSA). The VSA will consider the force's:

- call handling standards;
- response to victims;
- crime allocation arrangements;
- investigation standards; and
- suitability of the outcome of its investigations.

Also, because our 43 force inspections of CDI will be completed by April 2020, we will include CDI as an element of our VSA in each force on a tri-annual basis.

The VSA has been designed to:

- remove the need for a separate case file review (CFR) in those forces subject to a CDI inspection;
- remove duplication of work in listening to calls for service, and accessing and interpreting file logs for CFR, when these are already part of CDI inspections;
- significantly reduce the extent to which HMICFRS staff are in forces;
- introduce a new view for our inspection activity from the perspective of the victim; and
- identify best practice in forces.

The CDI methodology has been amended to support the reduction in the extent to which HMICFRS staff are in forces, and the integration into PEEL of the associated fieldwork. It will be reported as an element of each force's PEEL report.

Judgments and recommendations

Our approach to making judgments

As with all our PEEL inspections, the principal aim of PEEL 2020/21 is the promotion of improvements in policing. While maintaining their robustness, judgments should, to the greatest reasonably practicable extent, provide forces with information about the areas in which they need to improve, while providing a ‘health check’ assessment for the public. In making judgments, we consider all relevant evidence obtained about a force through our continuous assessment approach.

When HMICFRS first introduced PEEL judgments in 2014, there were detailed judgment criteria for each of the tiers: Outstanding, Good, Requires improvement, and Inadequate. Later, the approach was simplified, providing detailed criteria for ‘Good’ and ‘Requires improvement’ only. This worked well. HMICFRS proposes improving this further for PEEL 2020/21, by only specifying the characteristics of good performance. To be judged ‘Good’, a force will need to demonstrate these characteristics, bearing in mind that they are not intended to be prescriptive or exhaustive. If a force exceeds this standard substantially – for example, with good practice and/or innovation – it can expect to be judged ‘Outstanding’.

In 2015, HMICFRS introduced markers called ‘causes of concern’ and ‘areas for improvement’, which provide better information for forces on which areas they should focus on in order to improve. Our published definitions were:

- 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; and
- if HMICFRS’s inspection identifies a serious, critical or systemic shortcoming in practice, policy or performance, it will be reported as a cause of concern.

If a force does not have the characteristics of good performance, decisions about the most appropriate graded judgment will be informed by our consideration of whether the failures in question constitute areas for improvement or causes of concern. The continuous assessment approach for PEEL 2020/21, which more closely aligns with our inspection and monitoring regimes, means that our approach to judgments should be clearer and more closely linked to causes of concern and areas for improvement.

We therefore propose that:

- if areas are identified where there is a cause of concern of sufficient materiality, the lowest tier of judgment should ordinarily be given; and
- if areas are identified where to an appreciable extent a force needs to improve, the force cannot ordinarily be considered ‘Good’.

The level at which we make judgments

In previous iterations of PEEL, HMICFRS has published judgments at the pillar level (effectiveness, efficiency and legitimacy) and at the core question level – for example, ‘How effective is the force at tackling serious and organised crime?’

Our consultation with interested parties has highlighted that, while pillar judgments are seen as useful for the public and the media, core question level judgments are more useful in helping forces to focus on specific areas that require attention.

The new PEEL assessment framework is no longer structured around the previous pillars. As a result, producing judgments at this higher level would cover very different strands of activity, which could give a misleading picture of performance for the public.

We propose that, for PEEL 2020/21, judgments should be given at the core question level only. This best serves the aim of promoting improvements in policing and highlighting where a force is doing well and where it needs to improve. In addition, when a force has a CDI inspection as part of its PEEL evidence collection (each force will be subject to a CDI inspection every three years), we will also publish a CDI judgment alongside the core question judgments.

In our report narratives, we will of course continue to fulfil our statutory obligation to report on the efficiency and effectiveness of forces. Organisational efficiency will also be assessed and reported on.

The tiers of judgments

Since its inception in 2014, PEEL has adopted a four-tier structure for judgments: Outstanding; Good; Requires improvement; and Inadequate.

Consultation with interested parties indicated that the current grading system creates strong incentives for forces graded as ‘Inadequate’ or ‘Requires improvement’, but those forces graded as ‘Good’ or ‘Outstanding’ have insufficient incentives to improve. Additionally, the current system results in a very broad range of ‘Good’ – from the very good to the barely good.

Our proposed new approach to making judgments (explained above) goes some way to resetting the bar and will somewhat reduce the range of forces that qualify to be rated as ‘Good’. However, in so doing, inappropriate comparisons may be made with previous years; some grades for some forces may change although performance has stayed the same.

Under a four-tier structure, our definitions for each of the grades would be as follows:

Grade	Definition
Outstanding	The force has substantially exceeded the characteristics of good performance
Good	The force has demonstrated substantially all the characteristics of good performance
Requires improvement	We have identified a sufficiently substantial number of areas where the force needs to make improvements
Inadequate	We have concerns and have made recommendations to the force to address them

An alternative is to adopt a five-tier structure. This would provide a greater degree of information on where improvements are needed, and better reflect force performance, by adding more nuance to judgments – for example, by separating the very good from the barely good. It would encourage those forces that are currently stable in ‘Good’ to continue to improve. Under a five-tier structure, the definitions for each of the grades would be as follows:

Grade	Definition
Outstanding	The force has substantially exceeded the characteristics of good performance
Good	The force has demonstrated substantially all the characteristics of good performance
Fair	We have identified an appreciable number of areas where the force should make improvements
Requires improvement	We have identified a sufficiently substantial number of areas where the force needs to make improvements
Inadequate	We have causes for concern and have made recommendations to the force to address them

HMICFRS intends to test and evaluate both the four- and five-tier approaches in parallel with this consultation, as part of activity to pilot the new PEEL approach.

The pilot will take place in three forces to cover a range of geographic, social and operational contexts. This will enable the methodology to be tested in a range of circumstances. HMICFRS will use the results of the evaluation in conjunction with the responses to this consultation to decide whether to adopt a four- or five-tier structure for PEEL 2020/21 judgments.

Collaboration and partnership principles

Police forces no longer provide all local policing services in isolation. All forces are involved in local strategic partnerships and most now collaborate with other forces, other public bodies and the private sector. They collaborate on important aspects of service, ranging from shared back office functions to significant frontline functions, such as tackling serious and organised crime (SOC), providing armed policing capability and response, and operating the National Police Air Service.

It is important that PEEL assessments are flexible enough to accommodate the breadth of these arrangements. The following principles are proposed:

- HMICFRS will consider the nature of collaboration arrangements when scheduling inspection activity in collaborated forces;
- collaboration arrangements may give greater benefits to some forces than others, so it will be possible to come to different judgments in different forces about the same collaboration agreement;
- PEEL assessments will not lead to judgments on how effective local partnerships are but will comment on the effectiveness of a force's contributions to local partnerships; and
- in the same way that HMICFRS will comment on decisions a local policing body makes if they have an effect (adverse or favourable) on the efficiency and effectiveness of a force, we will also state if another agency's decisions affect a force's efficiency and effectiveness.

It is right that, in a tight financial climate, public institutions should exploit opportunities to join up with other organisations to cut out duplication and provide better, more efficient services to the public. There is also a substantial and increasing amount of crime that transcends local, regional and national borders. Online fraud, online child sexual abuse, other forms of cyber crime, human trafficking, regional and national drug dealing – often along 'county lines' – are all examples of crimes that are not confined to local areas. Police force boundaries have a diminishing relevance in the face of these crimes. As a result, forces need to work not only together but also with other public bodies to prevent and tackle these crimes and keep people safe.

It is therefore appropriate that HMICFRS continues to consider these arrangements as part of its inspections.

PEEL assessment framework question set

The PEEL assessment framework is structured to focus on three principal areas:

- an **operational assessment** – how well services are provided;
- an **organisational assessment** – how well the police force is run; and
- a **service user assessment** – the outcome from the perspective of those receiving the services.

To make these assessments, we will obtain evidence and make judgments by assessing police performance in respect of specific topics:

Operational assessment

1. How good is the force at preventing and deterring crime, anti-social behaviour, and vulnerability?

Topic areas

- The force prioritises the prevention of crime, anti-social behaviour and vulnerability.
- The force uses problem solving and works in partnership to prevent crime, anti-social behaviour and vulnerability.
- The force understands demand facing neighbourhood policing teams and manages resources in line with that demand.

2. How good is the force at responding to the public?

Topic areas

- The force identifies and understands risk effectively at initial contact.
- The force provides a quality-appropriate response to incidents, including those involving vulnerable people.
- The force understands the demand faced by officers initially responding to emergency calls and manages its resources to cope with that demand.
- The force has a good understanding of the wellbeing needs of its contact management staff and officers initially responding to emergency calls.

3. How good is the force at investigating crime?

Topic areas

- The force understands how to carry out quality investigations on behalf of victims and their families.
- Investigators provide a quality service to victims of crime.
- The force understands the crime demand it faces and the resources it needs to meet it effectively.
- The force manages the wellbeing of staff involved in investigations.

4. How good is the force at protecting vulnerable people?

Topic areas

- The force understands the nature and scale of vulnerability.
- The force provides ongoing safeguarding and support for vulnerable people including those at risk of criminal exploitation.
- The force works with other organisations to keep vulnerable people safe.
- The force has a good understanding of demand and resources.
- The force understands the allocation and productivity of resources when working with other agencies.
- The force manages the culture and wellbeing of staff involved in protecting vulnerable people.
- The force recognises and responds to vulnerability in all its forms.

5. How good is the force at managing offenders and suspects?

Topic areas

- The force is effective in apprehending and managing suspects and offenders to protect the public from harm.
- The force effectively manages the risk posed by registered sex offenders.
- The force has an effective integrated offender management programme.
- The force understands the demand and the resources it needs to manage suspects and offenders effectively.
- The force recognises and responds appropriately to the diversity of suspects and offenders.

6. How good is the force at managing serious and organised crime?

Topic areas

- The force makes good use of all available intelligence to identify, understand and prioritise SOC, and inform strong decision making.
- Good management and governance support an effective, efficient and legitimate whole-system response to SOC.
- Disruptive activity reduces the threat from SOC (Pursue).
- The force prevents people from engaging or re-engaging in organised crime (Prevent).
- Communities, organisations and individuals are resistant and resilient to the impact of SOC (Protect and Prepare).

7a. How good is the force at meeting the requirements of the *Strategic Policing Requirement*? *Ungraded question*

Topic areas

- The force understands its expected contribution to the Strategic Policing Requirement (SPR) threats and plans accordingly.
- The force assures itself that it continues to have the capacity and capability to respond to the SPR threats.
- The force plans effectively to meet changing future demands posed by the six SPR threats.

7b. How good is the force at protecting communities against armed threats? *Ungraded question*

Topic areas

- The force's response to threats needing an armed response, or the use of weapons that are less lethal, is well-led.
- The force complies with national procedures for the selection, acquisition and use of firearms, ammunition and specialist munitions.
- The force has a good understanding of its current and future operational requirements to meet demand requiring an armed response.
- The force works productively with neighbouring forces to share resources, build the capacity and reduce the cost of armed policing.
- The force has consistent, rigorous and reliable systems in place to evaluate operational performance and make operational improvements.
- Operational plans help the force to respond effectively to threats requiring an armed response.

Organisational assessment

8. How good is the force at strategic planning and managing its organisation, making sure it achieves value for money, now and in the future?

Topic areas

- The force has an effective strategic planning and performance framework, making sure it tackles what is important locally and nationally.
- The force manages current demand well.
- The force makes sure it has the capability and capacity it needs to meet and manage current demands in the most efficient manner.
- The force understands future demand and is planning to make sure it has the right resources in place to meet future needs.
- The force makes the best use of the finance it has available and its plans are both ambitious and sustainable.
- The force actively seeks opportunities to improve services through collaboration and makes the most of the benefits of working collaboratively in line with its statutory obligations.
- The force can demonstrate that it is continuing to achieve efficiency savings and improve productivity.

9. How good is the force at building, developing and looking after its workforce, and encouraging an ethical, lawful and inclusive workplace?

Topic areas

- The force understands the wellbeing of its workforce and uses this understanding to develop effective plans for improving workforce wellbeing.
- The force maintains and improves the wellbeing of its workforce and understands the effect of the action it is taking.
- The force is building its workforce for the future.
- The force is developing its workforce to be fit for the future.
- Proactive and disruptive action taken by the force, and effective vetting management, reduce the threat and risk posed by police corruption.
- The force promotes an ethical and inclusive culture at all levels.

Service user assessment

10. How good is the force's service for victims of crime?

Topic areas

- The force manages incoming calls, assesses risk and prioritises the police response well.
- The force deploys its resources to respond to victims and incidents in an appropriate manner.
- The force's crime recording can be trusted.
- The force has effective arrangements for the screening and allocation of crimes for further investigation, and these take into account vulnerability and risk.
- The force carries out a proportionate, thorough and timely investigation into reported crimes, with senior level governance providing robust scrutiny.
- The force makes sure that it follows national guidelines and rules for deciding the outcome it gives for each report of crime.

11. How good is the force at engaging with the people it serves and treating them fairly, appropriately and respectfully?

Topic areas

- The workforce understands how to use force fairly and appropriately.
- The force understands and improves the way in which it uses force.
- The force engages with all its diverse communities to understand and respond to what matters to them.
- The workforce understands why and how to treat the public with fairness and respect.
- The workforce understands how to use stop and search powers fairly and respectfully.
- The force understands and improves the way it uses stop and search powers.

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