



Inspecting policing
in the public interest

Responding to austerity

South Yorkshire Police

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How well does the force provide value for money?

Overall judgment

South Yorkshire Police is on track to meet its financial challenge for the spending review. It continues to develop plans to address future austerity challenges and central to this will be extending collaboration with other forces.

Good

Summary

South Yorkshire has plans in place to meet its savings requirement for 2014/15. It will also meet the overall financial challenge of the spending review. Importantly, the force will implement new structures for providing policing within its four districts, and this work will provide a more flexible model, which can cope with the future.

Of central importance to savings for 2016/17 and beyond is extending existing collaborations with other forces in the Yorkshire and Humber region. Work is underway to develop the detail of this. HMIC welcomes the force's ambition, but there is a lot to be agreed before this becomes a reality. The force will need to monitor closely progress and might wish to identify back-up plans in the event of delays or other difficulties.

The force has seen a reduction in overall crime over the spending review, although this has been at a lower rate than for England and Wales. Overall crime levels remain higher than the figures for England and Wales. It is important that while South Yorkshire implements further changes, it keeps a strong focus on crime fighting and protecting its communities from harm.

To what extent is the force taking the necessary steps to ensure a secure financial position for the short and long term?

Good

South Yorkshire Police has developed savings plans to achieve the £12.9m savings needed in 2014/15 and £13.5m in 2015/16.

The force has identified that new structures for providing policing are necessary in meeting its spending review challenges.

Savings from 2016/17 onwards will become increasingly dependent on the force's ambition to increase services provided in collaboration with other forces. For this ambition to be realised, there is a need for firm plans to be agreed and implemented.

To what extent has the force an affordable way of providing policing?

Good

In response to austerity savings, South Yorkshire Police's public-facing services continue to be provided through four districts aligned to local authority boundaries

The force is now at the point of implementing a new structure for the provision of local policing.

Incrementally, business support functions have become increasingly provided through collaboration, much of which has been led by South Yorkshire Police

The next phase of the continuous improvement programme will focus on the collaboration of operational support and specialist crime.

To what extent is the force efficient?

Good

South Yorkshire Police is using a range of methods to understand the demand placed on its services and the consequences of that demand, e.g., the numbers of staff required for crime investigation and prosecution file preparation.

This information will be vital for the successful implementation of the new operating model

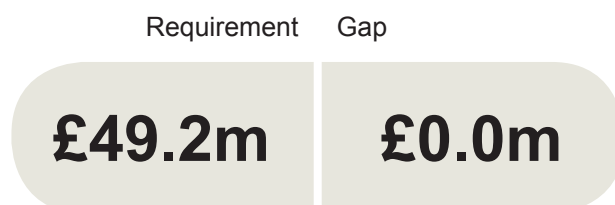
The force has flexibility in moving resources to address new and emerging threats e.g., child sexual exploitation.

The force has seen a reduction in overall crime over the spending review, although at a lower rate than in England and Wales, and overall crime levels remain high.

The force in numbers

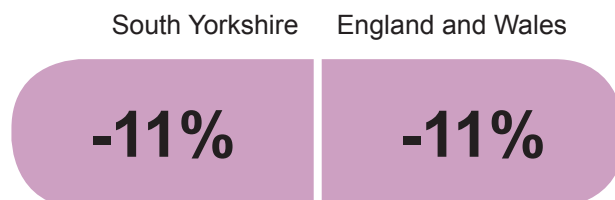
Financial position

The force's savings requirement

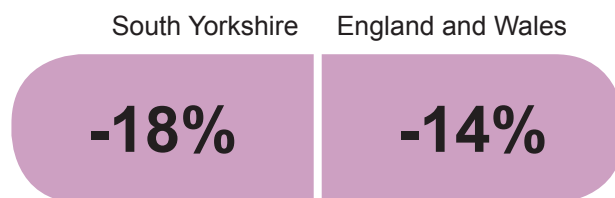


Providing policing

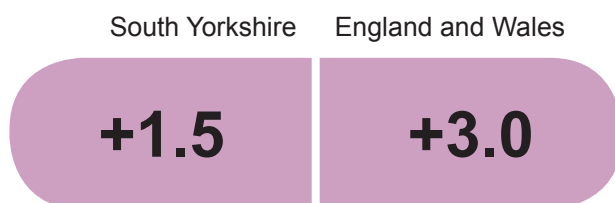
Planned change in police officer numbers 2010/11 – 2014/15



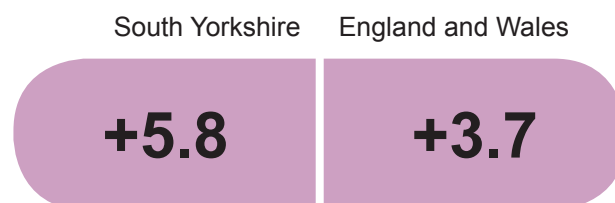
Planned change in total workforce numbers 2010/11 – 2014/15



Planned proportion of police officers on the front line 2014/15 vs 2010/11 (percentage points)



Planned proportion of total workforce on the front line 2014/15 vs 2010/11 (percentage points)





Efficiency

Police officer cost per head of population
2013/14

South Yorkshire

England and Wales

£107.5

£117.7

Workforce cost per head of population
2013/14

South Yorkshire

England and Wales

£160.6

£168.1

Change in recorded crime
2010/11 – 2013/14

South Yorkshire

England and Wales

-10%

-14%

Victim satisfaction 2013/14*

South Yorkshire

England and Wales

84.6%

85.2%

*Confidence intervals: $\pm 1.4\%$ for South Yorkshire; $\pm 0.2\%$ for England and Wales.

Introduction

In October 2010, the Government announced that central funding to the Police Service in England and Wales would reduce by 20 percent in the four years between March 2011 and March 2015.

HMIC's Valuing the Police Programme has tracked how forces are planning to make savings to meet this budget demand each year since summer 2011. This report identifies what we found in this, our fourth year.

Our inspection focused on how well the force is providing value for money. To answer this question we looked at three areas:

- To what extent is the force taking the necessary steps to ensure a secure financial position in the short and long term?
- To what extent has the force an affordable way of providing policing?
- To what extent is the force efficient?

During our inspection we collected data and plans from forces, surveyed the public to see if they had noticed any changes in the service they receive from the police as a result of the cuts, and conducted in-force inspections. We also interviewed, where possible, the chief constable, police and crime commissioner and the chief officer leads for finance, change, human resources and performance in each force, and held focus groups with staff and other officers.

This provides the findings for South Yorkshire Police.

To what extent is the force taking the necessary steps to ensure a secure financial position for the short and long term?

HMIC looked at the savings plans that forces have developed in order to meet the financial challenge of the spending review, and for the year after 2015/16. It is also important that forces look to the future beyond 2016 in their planning, so we also explored how they are starting to prepare for further financial challenges.

Financial challenge

South Yorkshire Police has identified that it needs to save £49.2m over the four years of the spending review (i.e., between March 2011 and March 2015).

As a proportion of its overall budget, this savings requirement of 16 percent is lower than the value for England and Wales, but HMIC considers that South Yorkshire Police faces a particularly difficult challenge. It attracts a high central funding contribution, but lower local funding than many other forces, which means that central funding cuts have a greater impact compared with other forces.

Despite this, South Yorkshire Police reported under spends in the first three years of the spending review period. This provides a firm base for recurring savings in future.

The scale of the challenge

Although South Yorkshire Police has already made considerable reductions in its workforce in line with the new operating model, there remain opportunities to achieve further efficiencies in line with similar costs in other forces:

- the force spends more per head of population than most other forces in England and Wales;
- it has a higher number of police staff per head of population than most other forces in England and Wales; and
- the cost of police officers and police staff per head of population is higher than most other forces in England and Wales (although these costs have reduced over the spending review period).

Savings plans for 2014/15 and 2015/16

South Yorkshire Police has developed savings plans to achieve the £12.9m savings needed in 2014/15 and £13.5m needed in 2015/16.

Outlook for 2016 and beyond

Future savings will be increasingly dependent on the review of local policing and increased collaboration. HMIC is encouraged that South Yorkshire Police has identified the reductions required in local policing. The achievement of this reduction will be dependent on the implementation of an operating model which is flexible and can cope with changing demands to ensure that the savings requirement can be accommodated.

South Yorkshire Police has a detailed financial forecast up to 2016/17. While the savings from local policing are achievable, the force faces more of a challenge to make savings from further collaboration, given the short timescales in the force's plans.

Chief constables in the Yorkshire and the Humber region have agreed to set up a future collaboration working group and have co-opted senior officers to the group. A major part of this group's work will be to explore collaboration in specialist crime and operational support functions. However, the other forces in the region are further ahead in terms of agreeing alliances between participating chief constables and police and crime commissioners, the design of change programmes and the establishment of change teams to make the identified savings. This is particularly important set against the ambitious timescales in which South Yorkshire Police intends to secure savings.

The police and crime commissioner holds reserves of £39m, which include £12.9m earmarked for invest-to-save plans. This provides a level of assurance, should future changes require additional funding.

Summary

Good

- South Yorkshire Police has plans in place to achieve the savings needed in 2014/15 and the £13.5m required in 2015/16.
- The force has a track record of achieving the savings it has planned to make.
- South Yorkshire Police has identified that new structures for providing policing are necessary in order to meet its spending review challenge.
- Savings from 2016/17 onwards will become increasingly dependent on South Yorkshire Police's ambition to increase the number of services provided in collaboration with other forces. For this ambition to be achieved there is a pressing need to build on existing collaborations and for firm plans to be agreed and implemented.
- The force's financial position is underpinned by reserves held by the police and crime commissioner.

To what extent has the force an affordable way of providing policing?

HMIC looks at how the force is structured to provide policing. We ask if this is affordable as the force responds to its financial challenge. We look at what the force is doing to reduce its costs, how it is protecting officers and staff engaged in fighting crime and keeping communities safe, and how it is making the required changes through its change programme.

How the force provides policing

South Yorkshire Police's new structure for providing policing will be characterised by large multi-skilled local policing teams. These will provide neighbourhood policing, crime investigation and emergency response in four districts, which are aligned to four local authority areas in Sheffield, Barnsley, Rotherham and Doncaster. This district structure will be supported by force-wide provision of operational support, specialist crime services and corporate services.

This new structure will permit the force to maintain its identity with local authority areas, which it considers to be important. This will be reinforced through the secondment of a council officer to each local policing team. The main difference will be the multi-skilling of local policing teams that will combine the roles of emergency response, neighbourhood policing, and investigations, which have traditionally been seen as separate functions.

Police officers, police community support officers (PCSOs) and police staff will also be available at district level to tackle persistent offenders, anti-social behaviour and problem areas. When specialist police officers are needed or more serious crimes need investigating, resources will be provided by centralised teams.

Collaboration

HMIC monitors forces' progress on collaboration because it offers the opportunity to provide efficient, effective policing and helps to achieve savings.

South Yorkshire Police has a strong commitment to, and plays a key role in, collaboration. HMIC is assured that it is subject to robust governance, and that it is integral to the force's sustainability and response to the austerity challenge. Collaboration is built on a lead-force model where a force is nominated to take the strategic lead for other forces. South Yorkshire leads through a single chief officer for human resources and training both in South Yorkshire Police and in Humberside Police, an achievement that is the first of its kind in England and Wales.

The challenge for South Yorkshire Police is undoubtedly to repeat the progress it has made in business support in its operational policing. South Yorkshire has embarked as the

strategic lead in the training, command and deployment of armed officers. The scope of the working group is now due to expand into collaborating on operational support and specialist crime, which needs to be integral and explicit in the future change programme.

The setting up of a future collaboration working group of chief constables in the Yorkshire and Humber area is encouraging. However, this ambition needs to be translated into firm plans, given the importance of collaboration in the force's savings future plans beyond 2015/16.

In 2014/15, the force expects to spend 9 percent of its net revenue expenditure on collaboration; this is lower than the 11 percent figure for England and Wales. Collaboration is expected to contribute 11 percent of the force's savings requirement, which is broadly in line with the 10 percent figure for England and Wales.

Managing change

Reductions in police budgets have led to a shrinking workforce. HMIC expects forces to look at longer-term transformation that can help maintain or improve the service they offer to the public and prepare for future funding reductions.

The force's transformational change programme draws together a number of areas. These include analysis of the challenges facing the force, developing new structures for providing policing, analysis of the impact of changing patterns of demand on the force's services, the promotion of alternative means of providing services to communities (e.g., social media and online tracking of reported crime), and an improved service for callers to the force's control centre.

The change programme now benefits from the recent appointment of a continuous improvement manager. The police and crime and commissioner's establishment of an efficiency advisory panel, with representation from local businesses, provides further impetus and has a particular remit of reviewing the benefits of collaboration.

HMIC was also encouraged by alliances that South Yorkshire Police has forged with Sheffield Hallam University and the University of Sheffield to enable improvements whose consequences are validated by academic research.

The force identified that the main elements of its change programme during the spending review are:

- changing the way business support functions are provided;
- changing the way operational support functions are provided;
- collaboration with other forces;

- improved use of technology and IT systems, and contract renegotiation; and
- the use of mobile technology.

The force identified that the main elements of its change programme, as it responds to future financial pressures, will include:

- further collaboration with other forces;
- changing the way specialist policing functions are provided;
- changing the way operational support functions are provided;
- changing the way local policing is provided; and
- improved call management.

How is the force supporting its workforce to manage change and effective service provision?

HMIC was assured that explicit links exist between staff involvement and continuous improvement. The change programme intranet site has a mechanism for staff and officers to suggest improvements and feedback on reviews. Feedback from staff in focus groups suggested that the principle of continuous improvement was active within the organisation and it was common for suggestions to be acted upon.

A cultural change programme has been launched that centres around five main components:

- a people and wellbeing strategy;
- leadership style;
- standards;
- communication and engagement; and
- continuous improvement.

An extensive communication programme is linked to the change programme, which includes staff surveys, chief constable's briefings and the change programme briefing process. Email updates are sent regularly and the intranet has been recently reviewed and updated.

An example of staff involvement being directly linked to particular improvements includes the trial issue of portable information systems to provide information to officers and PCSOs on the street. Other examples of initiatives that are being used to support cultural change within the organisation include a revamped appraisal system that is currently being piloted

within Rotherham, change champions within the organisation, a leadership development programme, and the provision of over thirty workforce development coaches.

The force actively manages health indicators, and the chief officer responsible for human resources personally assesses staff members considered most at risk. This aims to provide regular oversight and active management to reduce risk. The force has a very active occupational health unit, wellbeing sessions are held at police stations, and extra capacity and support has been made available to staff and officers affected by historical issues within the force.

How is the force achieving the savings?

Because around 80 percent of a police budget (on average) is spent on staff costs, it is not surprising that forces across England and Wales plan to achieve most of their savings by reducing the number of police officers, PCSOs and police staff employed.

However, we also expect forces to bear down on their other costs (non-pay) such as the equipment they buy, the accommodation and vehicles they use and the contracts they enter for services (e.g., for cleaning). The force plans to make 11 percent of its savings from non-pay; this is lower than the 29 percent figure for forces in England and Wales.

Non-pay savings have centred on a range of environmentally friendly initiatives including the reduction of the estate and the sale of energy-inefficient buildings, the installation of biomass boilers, and connecting buildings to low-carbon district heat networks in Sheffield.

Another initiative to reduce non-pay costs has been changes to the fleet, which achieved savings in the capital replacement programme for 2013/14 and attracted national recognition from the trade press. In addition, the police and crime commissioner set the force an additional non-pay saving target of £3.4m, which was achieved in 2013/14.

As with other forces, most savings come from reducing the workforce. South Yorkshire Police made an early start on this in 2010 when it slowed its recruitment of new police officers and police staff, and reduced the number of police staff. The force plans to make 89 percent of its spending review savings requirement from its pay budget. This is a higher proportion than for other forces.

The following table shows the force's planned changes to workforce numbers over the spending review period, and compares these to the change for England and Wales.

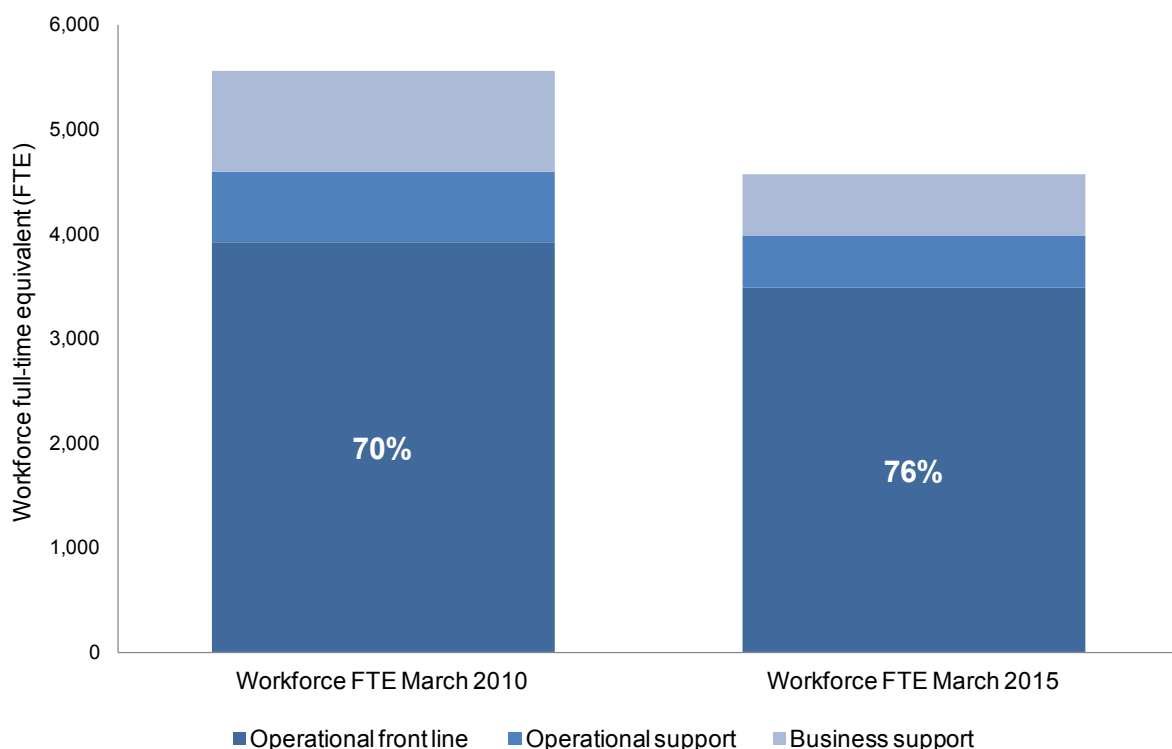
Please note, these figures are rounded.

| | 31 March 2010 (baseline) | 31 March 2015 | Change | Force change % | Change for England and Wales % |
|-----------------|---|--------------------------|---------------|---------------------------|---|
| Police officers | 2,953 | 2,620 | -333 | -11% | -11% |
| Police staff | 2,404 | 1,714 | -690 | -29% | -17% |
| PCSOs | 328 | 328 | 0 | 0% | -22% |
| Total | 5,684 | 4,662 | -1,022 | -18% | -14% |
| Specials | 227 | 650 | 423 | 186% | 44% |

It is important that as forces reconfigure their structures and reduce workforce numbers, they focus on maintaining (or if possible increasing) the proportion of people in frontline crime-fighting roles.

HMIC defines the people who work on the police front line as those who are in everyday contact with the public and who directly intervene to keep people safe and enforce the law.

The following chart shows the planned change in the workforce’s frontline profile in South Yorkshire Police.



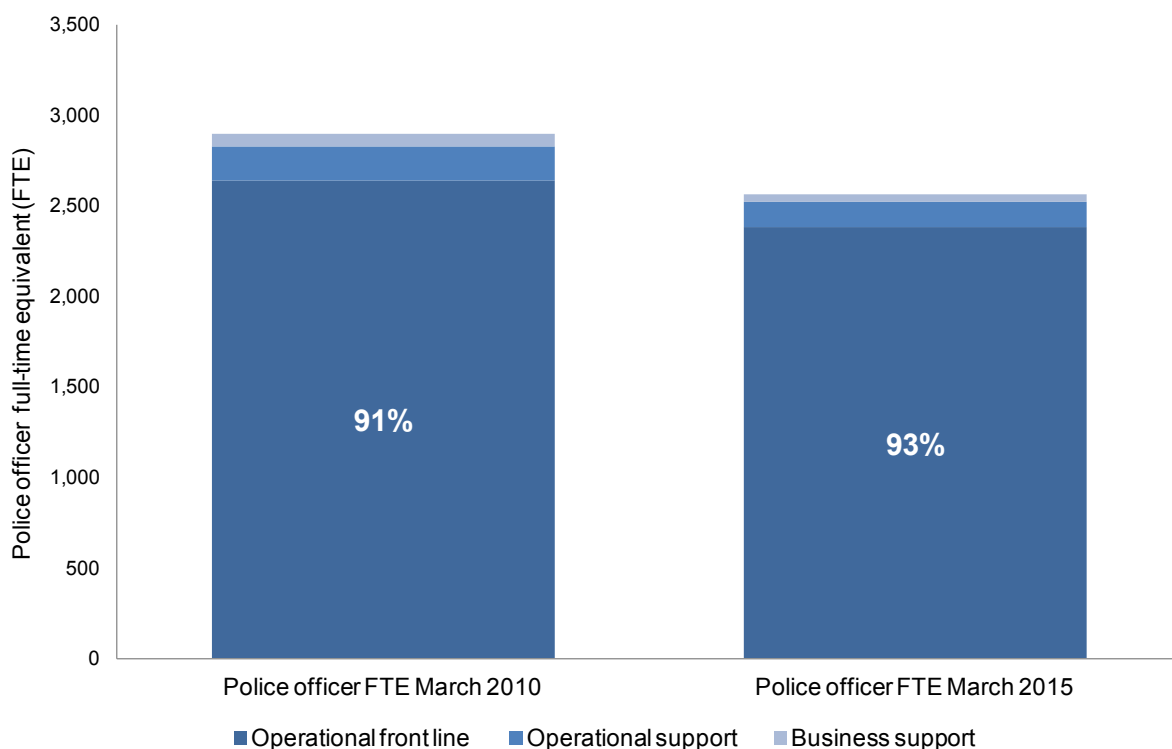
Note: England and Wales reports an increase in the proportion of workforce on the front line from 74 percent in March 2010 to 78 percent in March 2015.

The number of officers, PCSOs and staff working on the front line is projected to reduce by 436 between March 2010 and March 2015 (from 3,918 to 3,482).

Over the same period, the proportion of South Yorkshire Police’s total workforce allocated to frontline roles is projected to increase from 70 percent to 76 percent. This compares with an overall increase across England and Wales from 74 percent to 78 percent.

The number of South Yorkshire’s police officers in frontline roles is planned to reduce by 262 from 2,640 in March 2010 to 2,378 by March 2015, as the following chart shows. The proportion of those remaining on the front line is projected to increase from 91 percent to 93 percent. This compares to an overall increase across England and Wales from 89 percent to 92 percent and shows South Yorkshire Police is successfully protecting frontline crime-fighting roles as it makes these cuts.

The following chart shows the planned change in police officers' frontline profile.



Note: England and Wales reports an increase in the proportion of police officers on the front line from 89 percent in March 2010 to 92 percent in March 2015.

Summary

Good

- In response to spending review savings, South Yorkshire Police’s public-facing services continue to be provided through four districts aligned to local authority boundaries.
- Incrementally, business support functions have become increasingly provided through collaboration, much of which has been led by South Yorkshire Police.
- The force is now at the point of implementing a new operating model. Major features will include the retention of four districts supported by multi-skilled teams, a capability at district level to align resources to problem individuals/areas, a focus on persistent offenders and instances of anti-social behaviour, and force-wide support in the form of operational support, specialist crime and corporate services.
- The next phase of the continuous improvement programme will focus on the collaboration of operational support and specialist crime.

To what extent is the force efficient?

HMIC looks at how the force understands the demands that it faces and how it allocates both financial resources and staff to meet these demands. We look at how these decisions are leading to effective results for the public; in particular, that police are visible and that they attend promptly when called, that they are fighting crime and keeping communities safe, and that victims are satisfied with the service they receive.

How well does the force understand and manage demand?

The force uses a variety of sources of information to understand the demands, risks and threats it faces. An annual intelligence assessment takes account of risks, demands and the challenges affecting the force, which includes information from local partners, and recognises national threats that may affect the South Yorkshire policing area. Analysed areas of risk include local crime and disorder, public confidence, counter terrorism and serious and organised crime. Demand analysis also stretches beyond the number of crimes and incidents the force deals with to areas such as demographic changes in communities, welfare reform and the impact of the spending review.

These assessments are refreshed for fortnightly tasking and co-ordinating meetings. The assessments are updated with current information at the daily operational meetings which make decisions about deploying resources to deal with emerging threats.

How efficiently does the force allocate its resources?

Areas identified as high risk are prioritised, and additional resources are allocated. The last assessment identified child sexual exploitation as a strategic risk and fifty-six extra staff have been aligned to this risk. At a day-to-day level, resources can be moved to areas of demand through a series of tasking meetings from local to force level.

The change programme has also expanded business improvement techniques to areas such as custody and investigative functions. This methodology, complemented by good practice from other forces, is playing a crucial role in the implementation of the new operating model by providing an evidence-based validation of the resourcing decisions.

How does the force respond and keep its communities safe?

The challenge for forces is not just to save money and reduce their workforce numbers, but also to ensure the choices they make do not have a negative impact on the service they provide to their communities. HMIC looked for evidence that keeping the communities safe is at the heart of the force's decision.

It is important that during periods of change, forces are able to maintain strong performance in a number of areas such as crime reduction and detection, and public confidence and satisfaction. Communities are the core of the force’s new operating model and the flexibility that South Yorkshire Police has shown in addressing new and emerging threats (e.g., child sexual exploitation) reflects this commitment.

Performance monitoring in South Yorkshire Police also reflects its commitment to community safety. Crime trends are assessed through statistical process control. This is underpinned by principles that include active and visible leadership, measures that support preventing crime and protecting the public and officers, and staff understanding their role in community safety.

This approach has enabled the force to refocus performance management on issues that really matter to communities while being responsive to any particular type of crime that is causing concern. Performance management in South Yorkshire Police has been quality assured by the College of Policing.

Calls for service

HMIC examined whether South Yorkshire Police was taking longer to respond to calls for help as a result of its workforce reductions and other changes designed to save money. Forces are not required to set response times or targets and are free to determine their own arrangements for monitoring attendance to calls, so information between forces is not comparable.

We found that over the four years since 2010, South Yorkshire had maintained the same target response times of 15 minutes for calls classed as ‘emergency’ (also known as grade 1. Over the same period, calls classed as a ‘priority’ (also known as grade 2) had a target response time of within 60 minutes.

The following table compares the force’s performance in 2010/11 to 2013/14.

| Calls for service | 2010/11 | 2013/14 |
|---|----------------|----------------|
| Percentage of emergency calls on target | 95.0 | 91.0 |
| Percentage of priority calls on target | 85.8 | 76.5 |

Over the spending review, attendance for both emergency calls and priority calls within target timescales has declined.

Visibility

The work done by police officers and staff in visible roles (such as officers who respond to 999 calls, deal with serious road traffic collisions or patrol in neighbourhoods) represents only a part of the policing picture. Chief constables need to allocate resources to many other functions in order to protect the public, such as counter terrorism, serious and organised crime, and child protection (to name just three).

That said, research shows that the public value seeing visible police officers on patrol in the streets, and that those who see police in uniform at least once a week are more likely to have confidence in their local force. HMIC therefore examined how far the changes being implemented by the force had affected the visibility of the police in South Yorkshire.

In 2014, South Yorkshire Police allocated 61 percent of its police officers to visible roles. This is 1.2 percentage points higher than the number allocated in 2010, and higher than the figure for most other forces (which was 56 percent across England and Wales).

Police visibility is further enhanced by PCSOs, who principally support community policing. Looking at the proportion of police officers and PCSOs, in 2014 South Yorkshire Police allocated 65 percent to visible roles. This is 1.8 percentage points higher than it allocated in 2010, and higher than the 60 percent figure for England and Wales.

HMIC conducted a survey¹ of the public across England and Wales to assess whether the public had noticed any difference in the way their area is being policed. Of those people surveyed in South Yorkshire, 12 percent said that they have seen a police officer more often than they had 12 months ago; this compares to 12 percent of respondents in England and Wales.

Furthermore, 77 percent of respondents in South Yorkshire said they felt safe from crime where they lived, compared to 84 percent of respondents in England and Wales. Finally, 8 percent said they felt safer from crime than they did two years ago, compared to 9 percent of respondents in England and Wales.

Crime

In 2010, the Home Secretary set a clear priority for the police service to reduce crime. Between 2010/11 and 2013/14 (which includes the first three years of the spending review), South Yorkshire Police reduced recorded crime (excluding fraud) by 10 percent, compared with a reduction of 14 percent in England and Wales.

¹ Sample sizes for each force were chosen to produce a confidence interval of no more than ± 6 percent and for England and Wales, no more than ± 1 percent. Forces' differences to the England and Wales value may not be statistically significant.

Over this period, victim-based crime (that is, crimes where there is a direct victim, such as an individual, a group, or an organisation) decreased by 9 percent, compared with a reduction of 14 percent in England and Wales.

Looking just at the last 12 months, recorded crime (excluding fraud) fell by 1 percent, which is in line with the figure for England and Wales (a reduction of 1 percent).

By looking at how many crimes occur per head of population, we get an indication of how safe it is for the public in that police area. The table below shows crime and anti-social behaviour rates in South Yorkshire (per head of population) compared with the rest of England and Wales.

| 12 months to March 2014 | Rate per 1,000 population | England and Wales rate per 1,000 population |
|-----------------------------|---------------------------|---|
| Crimes (excluding fraud) | 67.8 | 61.1 |
| Victim-based crime | 62.2 | 54.3 |
| Sexual offences | 1.1 | 1.1 |
| Burglary | 11.4 | 7.8 |
| Violence against the person | 8.9 | 11.1 |
| ASB incidents | 57.1 | 37.2 |

It is important that crimes are investigated effectively and that the perpetrator is identified and brought to justice. When sufficient evidence is available to identify who has committed a crime, it can be described as detected. South Yorkshire Police’s detection rate (for crimes excluding fraud) for the 12 months to March 2014 was 24 percent. This is below the England and Wales detection rate of 26 percent.

We have chosen these types of crime to give an indication of offending levels in the South Yorkshire force area. For information on the frequency of other kinds of crimes in your area, go to www.hmic.gov.uk/crime-and-policing-comparator.

Victim satisfaction surveys

An important measure of the impact of changes to service provision for the public is how satisfied victims are with the overall service they receive when they seek police assistance.

In the 12 months to March 2014, 84.6 percent (± 1.4 percent) of victims were satisfied with the overall service provided by South Yorkshire Police. This is broadly in line with the figure for England and Wales figure of 85.2 percent (± 0.2 percent).

Changes to how the public can access services

Forces are exploring different ways in which the public can access policing services. South Yorkshire uses social media to provide information to the public, and neighbourhood policing teams have their own web pages. Beyond this, South Yorkshire Police has an extensive community engagement strategy both to consult and provide information. The main elements of this include regular contact with important individual networks, police and community together meetings and young people consultative processes.

Summary



Good

- South Yorkshire Police is using a range of methods to understand the demand placed on its services and the consequences of that demand, e.g., the number of staff required for crime investigation and prosecution file preparation.
- This information will be vital for the successful implementation of the new operating model.
- The force has flexibility in moving resources to address new and emerging threats, such as child sexual exploitation.
- The force has seen a reduction in overall crime over the spending review, although at a lower rate than in England and Wales, and overall crime levels remain high.

Our judgments

HMIC uses four categories for making judgments, two are positive and two are negative. The categories are:

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

Judgment is made against how well the force achieves value for money, it is not an assessment of the overall effectiveness of policing. In applying the categories HMIC considers whether:

- the way the force is achieving value for money is good, or exceeds this standard sufficiently to be judged as outstanding;
- the force requires improvement in the way it achieves value for money, and/or there are some weaknesses; or
- the force's provision of value for money is inadequate because it is considerably lower than is expected.