



The Office of Matthew Grove

*Working hard to keep you safe*

Mail Room  
Force Headquarters  
Hull  
HU5 5SF  
[www.humberside-pcc.gov.uk](http://www.humberside-pcc.gov.uk)

HMCIC Tom Winsor  
HMIC  
6<sup>th</sup> Floor  
Globe House  
89 Eccleston Square  
London  
SW1V 1PN

Contact: Matthew Grove

Tel: 01482 220787  
e-mail: [pcc@humberside.pnn.police.uk](mailto:pcc@humberside.pnn.police.uk)

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Dear *Tom*

### **Consultation on the HMIC proposed programme for regular force inspections**

Thank you for consulting with me on the development of the PEEL programme as outlined in your letter dated 7 July 2014. Whilst both the HMIC and I are fully committed to providing the best possible policing service I have a few areas that require further clarification and I would be grateful for your response. I am obviously happy to meet in person to discuss my initial observations as detailed below.

#### **Local versus National – Conflict of Priorities**

There is real danger that the focus of the proposed inspection regime will conflict with the objectives and intent I have already established within my Police and Crime Plan. You will appreciate that the statutory responsibility for setting local policing priorities sits with me as Police and Crime Commissioner. My concern is that a police service that is already under-going a constricting budget, amounting to almost 30% in real terms by the end of the CSR period, will be placed in the invidious position of having to decide whether to follow the priorities of my Police and Crime Plan or to meet the potentially conflicting priorities that are implicit in the proposed PEEL inspection regime. The impact of not achieving either will be significant and ultimately lead to reduced public confidence in the force, which can have local, regional and long lasting results.

It might be helpful if I give an example that illustrates my point. HMI Roger Baker recently wrote to my Chief Constable, Justine Curran, highlighting his concerns about recent increases in some categories of recorded crime in Humberside. Indeed the force is now 'on watch' as a consequence. Amongst his concerns was an increase in bicycle theft. In drawing up my Police and Crime plan I consulted widely and carefully with local people and they made it very clear that they want the force to concentrate its efforts on those crimes that cause the greatest harm to our communities. It will come as no surprise to you to learn that bicycle theft does not anywhere feature as a priority but your HMI's focus places the force under pressure to divert resources into this area of activity if the force is to avoid being deemed to be a poor performer. Given the PEEL process will focus significantly on crime performance this gives me a real cause for concern.

At the very time when the public are beginning to embrace the concept of a Police and Crime Commissioner as their elected representative who tackles the totality of policing; including local, regional and national policing issues along with the wider “and crime” dynamic with other partner organisations there is potential for members of the public to become confused and think there are two masters, i.e. the Commissioner and HMIC.

### **Frequency, Validity and Costing of Inspections**

I am concerned that the police are being forced to endure a disproportionate level of inspection activity, especially when compared to our partner organisations. I truly believe the proposed regime will create an ‘imbalance’ of inspection activity and add to the burden of inspection that the Force already faces.

I envisage it becoming increasingly difficult for forces nationally to provide the resources necessary to furnish all future requests by HMIC, especially given the climate we find ourselves in financially. The practical reality of the hidden costs; in terms of time, money and people, will create an extra layer of bureaucracy whilst distracting us from focusing on our key requirement, which is the actual delivery of a service to the public.

I believe there is a case for continuing with a themed inspection approach, albeit one reduced significantly in size and focused on the things that matter most to local people. At present HMIC is in the position of being able to make significant recommendations without having to consider the consequences of resourcing them. In my opinion this paradigm of power without responsibility is not sustainable in an environment of contracting resources and cannot be in the public interest. I and many of my fellow Commissioners need to see a significant shift in that all future HMIC report recommendations are costed by HMIC. This would allow my Chief Constable to determine a legitimate response in light of financial viability and local need. To aid public accountability, it would also be beneficial for HMIC to provide details of the cost of individual inspection activity. This would provide transparency to the public surrounding the wider inspection regime and the cost of policing. This is incredibly important, especially as I need to justify the precept and the value for money they receive across the spectrum of police and crime.

### **Subjectivity, Public confidence and Reputational Risk**

In respect of the sixteen questions that HMIC propose asking, they appear perfectly valid and generally cover the right areas of police (but not ‘policing’) activity. However, there is potential for the answers to be very subjective, not to mention the variance in the evidence requested and/or provided. If HMIC intend pursuing the PEEL process in its current form, I would advise a national framework to provide consistency in the evidence required.

With respect to the proposed grades of outstanding, good, requiring improvement and inadequate; I would like to see a fifth grade of acceptable added. Currently, the four grades offered mean that a force is either above or below the average benchmark, when on pure statistics I would expect the majority to be on the average. Yet there is currently no provision for this grade. We have seen at first hand the destructive consequences of this grading scheme in the education sector.

Weighting of issues and scoring of evidence is still unclear. The framework mentioned above would assist, however, we need to understand if there is a particular weighting behind certain questions or areas of service. For example; does a low score in one area result in an automatic “requires improvement” grade irrespective of other areas? I am particularly concerned that crime figures will weigh disproportionately in the overall judgements that will be made, especially given the recent focus of your regional HMI in this area.

Again, mentioned above, public confidence in the police service is critical. The force is part of the community and as we drive down officer and staff numbers we must maintain that public confidence if they are to play their part in keeping their neighbourhoods safe. There is real danger that subjective and unbalanced grades could cause long term loss of confidence just as we need it the most. Through my local surveys and discussions the public have real confidence in Humberside Police and feel they are a credit to their communities. I would not want to see this lost due to subjective interpretations.

### **Consulting the Public**

I have significant concerns around HMIC undertaking further local public consultation. My concerns range from the cost of your proposal through to the fact that my role locally is to regularly undertake consultation with local people. This is something that I do all the time in order to understand what people want and inform my local priorities.

I would welcome an opportunity to engage with you further regarding this area to avoid a serious duplication of effort and hence unnecessary cost and confusion to the public.

### **Management Statements**

I support the idea of a focused Force Management Statement.

This will provide a further mechanism for me to legitimately hold the Force to account. However, unlike other publications such as my Annual Report, the statement should not be public-focused. It must concentrate on delivery of policing against the objectives set out in my Police and Crime Plan.

### **Spreading Best Practice**

I note that HMIC will be commenting on what is being done locally by the police. My hope is that you will also focus on what is not being done, along with reasons and suggestions as to how things could be changed accordingly. Best practice exists within the police service and HMIC should be one of the conduits for this, possibly via the College of Policing.

### **Conclusion**

With the election of Police and Crime Commissioners, the 920,000 members of the Humberside force area now have a known and recognisable voice that is engaging on local issues and starting to provide a coherency amongst the previously disparate strands of police, health, education, victim services, prisons and offender rehabilitation to name but a few; to ensure that we reduce duplication and costs whilst improving local delivery of services. I challenged my Chief Constable to re-think the delivery of policing within the pan-Humber area as a result of the budget restrictions and to ensure that the local population receive the best possible police service. This is all captured within my Police and Crime Plan.

I would welcome an opportunity to discuss further the potential methods of implementing the PEEL process in a way that compliments and builds on my Police and Crime Plan through local initiatives and delivery across the spectrum of domains, whilst maintaining that vital public confidence.

I look forward to hearing from you and in conjunction with my Chief Constable taking forward the PEEL process.

Yours sincerely

*Matthew Grove*

Matthew Grove  
Police and Crime Commissioner for Humberside

cc Rt Hon Theresa May MP, Home Secretary  
cc Police and Crime Panel members

Tom, I have very recently received a further HMIC letter dated 5<sup>TH</sup> August regarding the interim inspection in September. It would appear that the methodology for the PEEL process has already been adopted, despite the fact that I understood we were still in the consultation stage!  
Grateful for your thoughts on this.