



The Office of Matthew Grove

Working hard to keep you safe

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Our ref: MG/MS/2015

17 November 2015

Dear Home Secretary

HMIC PEEL Inspection Report – Efficiency

I am writing to you with my comments on the HMIC PEEL report entitled “Police Efficiency 2015, an inspection of Humberside Police”. I have also copied to the Chair of the Humberside Police and Crime Panel; Sir Thomas Winsor; our regional HMI, Michael Cunningham and the Chair of the Home Affairs Select Committee, The Rt Hon Keith Vaz MP and will post onto my website for public access.

I’d like to start by saying that I am very supportive of the role of inspectorates and consider them to be a vital component to transparency, accountability and general performance. However, I would also say that I am extremely disappointed by this latest HMIC report; obviously from a grading perspective but also due to its’ lack of context and ill-conceived impact on internal and external confidence in policing.

I have already highlighted my general concerns regarding the policing landscape and the roles of individual organisations and their links. This report and the general thrust of HMIC in the near and longer term increases my worry that the dynamics are currently wrong and are having a tangible and negative impact on local policing. With the establishment of Police and Crime Commissioners in 2012 the landscape shifted. Policing had, for the first time, a publically accountable face that was charged with holding the local force to account and being responsible for the totality of policing in that force area. However, this accountability is being corrupted by the approach of HMIC. HMIC are an inspectorate and are not there to hold forces to account, establish targets or set standards. However, that appears to be the direction of travel and it is both confusing and impacting on local policing services. The policing landscape and the respective roles and responsibilities within that picture must be considered and addressed; you either want local accountability with Police and Crime Commissioners or not, but you cannot have both with HMIC effectively delivering a “national Police and Crime Plan” through PEEL.

I welcome the assessment by Michael Cunningham in his foreword, specifically where he provides some wider context in terms of the current and future financial and leadership challenges that are faced by police forces throughout the country. Thereafter, I start losing confidence and respect for the general and specific findings in the main report and the individual force report.

The report stresses that policing has faced and will continue to face substantial challenges due to financial constraints and also the changing nature of crime and demand. I recognised

that Humberside Police had languished at the bottom of the majority of national league tables for a generation. Therefore, upon election in 2012 I hired a new Chief Constable and challenged her to re-design Humberside Police, making it fit for purpose in the 21st century, operate within its means in light of current and future financial cuts and for the first time deliver an effective policing service to the people in the Humberside force area. The officers and staff within Humberside police are second to none; therefore it was clear that the structure and management of the force had been woeful. This was the challenge and Humberside Police with the Chief Constable at the helm have made difficult but necessary decisions to put the force on a solid foundation for delivering a robust service now and over the next five years as the challenges intensify.

I see very few other forces making these bold decisions now and many continue to deliver a good policing service now but are complaining that they will be unable to do so in the coming years. These are the forces that are receiving “good” and “outstanding” grades on this recent inspection, yet Humberside who have a strong financial position moving forwards due to the difficult but essential decisions and plans are being subjected to quotes such as “for the first time, HMIC has graded a force as inadequate on efficiency”.

The implementation of the new force model went live in mid April 2015 and the inspection team arrived about four weeks later. I will be the first to highlight that the implementation of the biggest change to Humberside Police in a generation was not flawless. There were some significant problems. However, with the arrival of a new, positive and proactive chief officer team the Chief Constable had, for the first time, the horsepower to identify these issues and drive forward the pace of change and address each and every issue.

The inspection highlights some areas of concern that are snapshot in time immediately following the go-live of a large transformational change to policing delivery. All of these issues had been identified and were in the process of being addressed when the HMIC inspection team arrived. Therefore, the public release of this report without context or wider considerations is not only unprofessional and unjustified but also negative and inappropriate due to the real tangible impacts it has both internally to officers and staff but also externally to the public and media.

The assessments within the Humberside specific report provides a great deal of concern. I get a real feeling of “mission creep” from the HMIC report and general findings. The Chief Constable and I have a joint risk register that is used to capture and address significant and strategic risks. Therefore, it is not for HMIC to be concerned about whether there are risks. I set the priorities for the local area through the Police and Crime Plan, the Chief Constable delivers against those priorities and objectives. Any risks are highlighted with a plan to mitigate as appropriate. I am becoming ever more frustrated that HMIC are encroaching and providing ill-conceived comments on issues that either should not concern them or worse, without wider context.

The key statistics on pages 7, 8, 13 and 21 are a really important part of providing a policing service and confidence to the public. These numbers are only part of the demand cake and the College of Policing infographic clearly shows that 80% of demand on police is outside of these traditional assessments. However, along with crime statistics, Humberside are below the national average on reported crime types and have a longer term view on delivery into 2019 and beyond. This key piece of information is lost in the noise of local, regional and national media when the word “inadequate” is used. Therefore, again the context is lost and the message is all negative.

With the above in mind, the clear question is “what is the intent and motive behind HMIC inspections?” I am struggling to comprehend the answer to this.

Demand has been given a significant platform in this report, and rightly so. I fundamentally agree that in order to adequately allocate resources, including funding, you must understand your demand in terms of quantity and form. This is a nationally recognised area of weakness across all public service. Forces are generally good at understanding their specific calls for service but not so good at capturing, assessing, assigning and monitoring cross departmental demand, which as stated above accounts for 80% of police demand. Therefore, the National Police Chiefs’ Council have set up a demand reference group to look at demand within policing and the wider public sector. However, it is not for an inspectorate to determine or dictate individual force demand and any such intent to do so must be prevented.

As already highlighted the report does indicate areas of known concern following a significant transformational change. However, I also acknowledge that the report does recognise the use of the College of Policing, peer reviews from other forces and the fact that the force conducted a comprehensive assessment of demand to formulate the new structure. The report also highlights that the force has already recognised issues and is working to address them. Therefore, I continue to struggle with the concept and intent behind the report. It does nothing more than reduce local confidence in a force at a sensitive time due to a massive change programme.

Overall, I am obviously disappointed with a grading of inadequate. However, I fundamentally disagree with the grading, the developing perception that HMIC are there to hold the force to account, the method of report publication and sheer naive interpretation of issues without wider context. HMIC have the luxury of an increased budget from a top slice of force allocations and have used those extra resources to add further demand onto forces that are trying to deliver real frontline policing. This is fundamentally incorrect and I would call on Parliament to inspect the inspectorate to determine their role and value for money

As I said in a previous letter to you regarding the Core Business HMIC report:

- There are many good things HMIC could do to improve the performance of police forces across the country and I will continue to work positively with them and also challenge them where I feel their approach is inconsistent or assessments unfair. As I have stated previously, I fully believe that we need to have an open and honest debate as to the future of policing and how both Police and Crime Commissioners and HMIC fit into a potential new model. If the aspiration from the centre is to have national standards across policing then let’s discuss that issue openly and constructively rather than through negative and destructive HMIC generated sound bites
- I hope that HMIC will continue their work on behalf of the public, but not be so overzealous that they put a considerable administrative burden on an already stretched workforce and undermine the public’s confidence in a service they should be rightly proud of
- All forces have different priorities and this leads me back to the national vs local concern, which I have specifically raised with you in my response to previous HMIC reports (Crime Data Integrity response, dated 26 September 2014).

- This begs the question as to whether HMIC has adapted its own vision since the introduction of local accountability through Commissioners; on the surface it would not appear so. I am concerned that HMIC are increasing the number and breadth of inspections; improved service delivery is not provided by this model of a large and demanding inspectorate. Additionally, HMIC are straying into locally accountable decision making, which will hamper the work of the police at a local level and confuse local partners.

There is much more to be done from a local, regional and nation perspective to deliver a robust and sustainable policing service. However, this work can only be achieved by working in collaboration and partnership with other departments such as health, DWP, MoJ and education. This joint endeavour to determine collective and interwoven demand would allow resources to be allocated and performance to be more accurately monitored, potentially by a truly joint inspectorate.

I look forward to hearing from you and would welcome a further debate on the significant issues I have raised.

Yours sincerely



Matthew Grove
Police and Crime Commissioner for Humberside

Cc: Rt Hon Mike Penning MP
Rt Hon Keith Vaz MP, Chair Home Affairs Select Committee
Justine Curran, Chief Constable, Humberside Police
Sir Thomas Winsor, HM Chief Inspector of Constabulary
Michael Cunningham, HM Inspector of Constabulary, Northern Region
Councillor Evison, Chair of the Humberside Police and Crime Panel
Winston Roddick, Chairman, APCC