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Working hard to keep you safe

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Dear Home Secretary

RESPONSE TO HMIC PEEL ASSESSMENT 2015: LEGITIMACY, EFFECTIVENESS AND LEADERSHIP

As you are aware, HMIC published a number of reports in the weeks leading up to the PEEL 2015 assessment publications on 25 February 2016. This included reports on legitimacy, effectiveness and a statement on leadership.

My response includes observations on all of the above reports and outlines the action I have taken to date.

I would like to reiterate a more general issue around the HMIC inspection methodology made through my responses to you over the last 12 months.

As you know, the landscape following the establishment of Police and Crime Commissioners (PCCs) in 2012 has changed – we now have a publically accountable face for holding the local force to account and being responsible for the totality of policing in each force area – I feel that this accountability is being confused by the current approach of HMIC. HMIC are an inspectorate and are not there to hold forces to account, establish targets or set standards – this sadly appears to be the current direction of travel, which is both confusing for the public and impacting negatively on local policing services.

I firmly believe we need to improve the links between the PCC and the inspectorate so that our respective roles can be deconflicted. Ultimately both organisations, along with individual forces, are established to ensure the delivery of the best possible service to the public; this is best achieved through a positive, co-ordinated and cohesive approach. I am not convinced we are at that point and look forward over the coming new year of inspections to improving this vital link between the inspectorate and the elected person who is mandated to holding the force to account.

PEEL Assessment 2015

The PEEL Assessment was published on 25 February 2016, although I note that future PEEL assessments will be published later according to the recent HMIC consultation on their plans for 2016-17.

The PEEL Assessment, and the HMIC State of Policing Report, received very little media attention both locally and nationally. I think this in itself tells a story about the inspection

process. During February there was a 'rush' by HMIC to publish a plethora of reports – the legitimacy report, the effectiveness report and then the leadership statement – just prior to the full PEEL assessment and also the national 'State of Policing 2015' report by Sir Thomas Winsor. Not only has this approach confused the public, I also believe it switches them off as the reports are long and wordy, generally negative, and difficult to navigate through. When all the individual reports are put together, they also tell a slightly confused story about the force at times.

All this activity has detracted interest and focus from what should have been the key outcome for HMIC, i.e. the 'full' PEEL assessment. Although the individual reports provide a comprehensive analysis, this approach rarely highlights the sharing/promotion of good practice and shortcomings to the public, nor does it provide a comprehensive picture of the totality of policing; we all know that this can only be provided through taking account of a whole host of organisations.

I also believe that inspections should take much better account of local circumstances. Given that they are a 'snapshot' in time, it is important for HMIC to clearly and transparently state any local circumstances, which would assist me and other PCCs greatly in providing a rounded opinion to the public.

I fully understand that HMIC is still developing and refining the PEEL model, but the 'Wheel of PEEL' is clearly a gimmick too far in my view. It doesn't help the public; it merely confuses them with something that looks nonsensical. In addition, I question whether the 'wheel' has been assessed for readability and accessibility; I believe the way that the PEEL assessment is presented on the HMIC web-site compounds the issue for people with disabilities and those whose first language is not English.

The PEEL Assessment 2015, coupled with the national 'State of Policing 2015' report, has been a missed opportunity to provide a comprehensive picture of policing for the public.

HMIC Police Legitimacy 2015 Report

The HMIC Police Legitimacy 2015 report was published on 11 February 2016.

HMIC view the force as being 'good' in terms of how legitimate it is at keeping people safe and reducing crime. In my view, police integrity, fairness, and respect for equality and diversity are fundamental to maintaining and ensuring public trust and legitimacy in the police service.

It is fair to say that the fundamental restructure and modernisation of Humberside Police over the last several months has not been without its critics, and the changes I asked the Chief Constable to make clearly required the maintenance of an ethical culture. This journey is ongoing and I am pleased that there is recognition of the ethical culture that the force is developing. Parts of the report are testament to how far Humberside Police has moved on since the force restructure.

The clearly communicated vision and values, identified by HMIC, are driven by my own vision for policing and crime outlined in the Police and Crime Plan. I constantly reiterate the importance of delivering a quality and more responsive victim-focused service. This report tends to indicate that the right messages are finally getting through. Part of this cultural shift is down to a clear steer from me to the Chief Constable to encourage greater use of

discretion and professional judgement, as well as providing confidence around the future direction.

The report raises a number of concerns which I have already taken up with the Chief Constable. I was disappointed to hear that some staff were apparently too busy to engage with the public or deal with local concerns. I believe part of these concerns are related to the significant structural changes they have endured over the last several months, but this won't be the complete answer. I intend to monitor the situation over the coming months to ensure the progress made is not undermined.

I have secured development of several important initiatives to help drive a number of changes outlined in the HMIC report, including:

- 'Snapshot' staff surveys for a clear understanding of whether staff feel valued
- Confidential reporting line to report wrongdoing
- Regular meetings with staff associations to share issues and concerns
- An "impressive collaboration" (as stated by HMIC) with the fire and rescue service – this has attracted a large number of volunteers
- Integration of the Code of Ethics

I was deeply concerned with two findings by HMIC around non-compliance with the Best Use of Stop and Search scheme and the supervision and oversight of Taser usage. I have received assurances from the Chief Constable that scrutiny of Taser usage has increased, with a police inspector checking every time one has been used. I also heavily challenged the Chief Constable around non-compliance with the Best Use of Stop and Search scheme. Non-compliance is totally unacceptable; there is no excuse for not properly recording reasons for stop and search checks. Stop and search is a fundamental part of a proportionate and non-discriminatory policing response, and compliance must be embedded into the force culture. I shall be monitoring progress and have also ensured that the mobile-data solution being rolled-out across the force includes effective recording of stop and search, which will mean that compliance will no longer be an issue in future.

HMIC Police Effectiveness 2015 Report

The HMIC Police Effectiveness 2015 report was published on 18 February 2016. This follows on from the HMIC Police Effectiveness 2015 (Vulnerability) Report published in December 2015, which I responded to you on 21 January 2016. Several issues within the report on vulnerability are reiterated within the overall effectiveness report; I will not therefore comment in detail on the issues and actions taken around vulnerability.

The overall report re-states the question around how effective the force is at protecting from harm those who are vulnerable, and supporting victims. It is confusing to the public and media that the same issues around vulnerability are being brought up again several weeks later as a sub-section of the effectiveness report. This also reignites several issues which the force are already in the process of addressing. The sensible solution for HMIC would be to create either one report on effectiveness, or publish both at the same time. Because the vulnerability report also detailed issues around the change in force structure and the concerns around call handling, for example, this has all been unnecessarily repeated again several weeks later.

At this point I think it is worth noting that Humberside Police were one of only nine forces recently not to see an increase in crime (according to ONS figures), one of the best in the

country at bringing those committing the most serious sexual offences to court and the best in the country for convicting child rapists. Recent local figures also show Humberside Police 999 response to be one of the best in the country, with 96% of 999 calls answered within 10 seconds. In addition, 80% of calls to the 101 incident line are now being answered within 30 seconds.

The HMIC report views the force as 'requiring improvement' within the wide scope of 'effectiveness'. The picture painted by the report is a mixed one, with areas of good practice and areas of concern. The report further demonstrates how far Humberside Police has moved since the force restructure. It highlights much of the good work being done on a day-to-day basis by officers and staff to prevent crime and ASB. However, it rightly identifies areas where further improvement is required.

I am pleased that the report picks up on the collaborative work in the Yorkshire and Humber region around tackling serious organised crime, which has continually developed over the last several years. We have also recently developed Joint Specialist Operations with South Yorkshire Police through our Strategic Partnership.

The report raises a number of concerns which I have already taken up with the Chief Constable. I was disappointed that the report identified shortcomings in the prevention of crime and ASB. I know that overall crime levels are relatively high, but HMIC has also identified the strong partnership working, which is part of the thrust of my Police and Crime Plan for long-term crime reduction and keeping people safe.

HMIC Leadership Statement

The HMIC Police Leadership statement was published on 25 February 2016.

As per my comments earlier around the legitimacy inspection, the leadership statement outlines the clear message that officers have been enabled to lead. This is part of the cultural shift, with a steer from me to the Chief Constable around the used of discretion and professional judgement.

I am concerned that the statement duplicates what has been mentioned in previous inspection reports; for example, the issues around the new operating model which have been raised within both the legitimacy and effectiveness reports already. To keep reiterating such issues, within weeks of each other, does seem like overkill by HMIC in making a point. This constant push of specific messages, along with the ill-thought timing, confuses the public, staff and officers alike.

In addition to the statement, I am also struggling to understand the proposed inspection of leadership by HMIC as outlined in their consultation for 2016-17, and the subjective view on leadership at each rank/grade. There needs to be greater detail about how this will be inspected, and a need to understand the outcomes and risks of such an inspection, not to mention the validity of HMIC conducting this assessment.

Conclusions

Overall, I remain concerned that HMIC are still wanting to increase the number and breadth of inspections; improved service delivery is not provided by this model of a large and demanding inspectorate. Additionally, as I have already stated, I feel that HMIC are straying

into locally accountable decision making, which will hamper the work of the police at a local level and confuse our local partners and the public we serve.

This approach, coupled with other issues such as top-slicing of budgets for heavier inspection regimes and innovation funds, actually has the effect of stifling innovation and creating risk aversion. I am frustrated by many of the comments on issues that do not always take into account the wider local or regional context. These comments have a direct and disproportionate impact on public confidence that makes the positive journey ever more difficult.

Yours sincerely

A handwritten signature in cursive script that reads "Matthew Grove".

Matthew Grove
Police and Crime Commissioner for Humberside

cc Sir Thomas Winsor, HM Chief Inspector of Constabulary
Michael Cunningham QPM, HM Inspector of Constabulary, Northern Region
Justine Curran QPM, Chief Constable, Humberside Police
Winston Roddick, Chairman, APCC