



Norfolk's Police and Crime Commissioner (PCC) response to inspections published by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)

Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond and publish comments on all inspection reports pertaining to your force within 56 days of report publication.

Inspection Title:

Police effectiveness, efficiency and legitimacy – An inspection of Norfolk Constabulary

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Section 55 Response Deadline:

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Key Findings

In 2014, HMICFRS introduced their police efficiency, effectiveness and legitimacy (PEEL) inspections, which assess the performance of all 43 police forces in England and Wales. Forces are assessed against the characteristics of good performance, set out in the PEEL Assessment Framework 2023–2025.

It is not possible to make direct comparisons between the grades awarded in this PEEL inspection and those from the previous cycle of PEEL inspections. This is because the Inspectorate have increased their focus on making sure forces are achieving appropriate outcomes for the public, and in some cases, they have changed the aspects of policing they inspect.

Norfolk Constabulary is outstanding at recording crime. The Constabulary has a team that checks each report of crime or antisocial behaviour is recorded correctly.

Officers understand the importance of appropriate behaviours and communicate effectively with the public when carrying out stop and search. The majority of stop and search cases examined had reasonable grounds recorded. The Constabulary has strong external scrutiny and challenge of its use of stop and search.

The Inspectorate is pleased with how the Constabulary communicates with its communities and reduces harm caused by antisocial behaviour. Norfolk Constabulary has tailored its work to meet the needs of different communities and has robustly applied antisocial behaviour legislation. The Constabulary has sustained its good performance in preventing and deterring crime, but its recording of antisocial behaviour needs to improve.

Norfolk Constabulary has made a significant effort to review and improve its investigative standards. This has led to improvements in its ability to achieve well-supervised, better-quality investigations. The Constabulary has a higher charge/summons rate compared to other forces in England and Wales, but it needs to do more to always achieve appropriate outcomes for victims.

Norfolk Constabulary needs to improve how long it takes to respond to incidents at all levels. The 101-call abandonment rate is too high and, although the number of 999 calls answered within 10 seconds is higher than in most other forces in England and Wales, it is just below the national target. Norfolk is the fifth largest county in the country. The Constabulary receives a lower-than-average number of 999 calls and its 101 calls are within the typical range compared to other forces across England and Wales.

There are concerns about how the Constabulary is managing demand in the multi-agency safeguarding hub (MASH). Important information about victims is not always being shared with other agencies and there is insufficient oversight of standard risk domestic abuse cases. The Constabulary could miss opportunities to safeguard vulnerable adults and children.

HMICFRS is pleased with the way the Constabulary has reacted to immediate concerns about how it is managing the risk posed by registered sex offenders in the community and safeguarding children at risk of online abuse. It has reduced the workloads of personnel working in these areas.

Norfolk Constabulary has effective processes to manage its daily work. Performance data information is of high quality, with clear summaries for senior leaders so they have the information they need to oversee performance effectively and make informed decisions. However, the Constabulary has not yet sufficiently invested in new technology to help it increase productivity. It should identify opportunities to develop more sustainable approaches to managing changing demand by making better use of digital solutions.

HMICFRS judged that Norfolk Constabulary is:

- **Outstanding** at recording data about crime.

- **Good** at preventing crime.
- **Adequate** with their treatment of the public and use of police powers.
- **Adequate** at investigating crime.
- **Adequate** at developing a positive workplace.
- **Adequate** with leadership and force management.
- **Requires improvement** at responding to the public.
- **Requires improvement** at protecting vulnerable people.
- **Requires improvement** at managing offenders.

Recommendations

There are no recommendations made.

Areas For Improvement

17 areas for improvement are made within the report, and are detailed as follows:

Area for Improvement 1:

The constabulary needs to improve how it records equality data.

Area for Improvement 2:

The constabulary needs to make sure that use of force is accurately recorded, and that it takes steps to address disproportionate use and injuries to the person subjected to use of force.

Area for Improvement 3:

The constabulary needs to attend calls for service within its own set attendance times.

Area for Improvement 4:

The constabulary needs to reduce the number of non-emergency calls the caller abandons because they aren't answered.

Area for Improvement 5:

The constabulary needs to improve how it manages its calls for service that it assesses as appropriate for a response in 24 hours.

Area for Improvement 6:

The constabulary needs to make sure that investigations are allocated to officers and teams with sufficient skills and experience to carry out quality investigations.

Area for Improvement 7:

The constabulary doesn't consistently achieve appropriate outcomes for victims.

Area for Improvement 8:

The constabulary should increase its consideration and use of preventative orders to safeguard vulnerable people in appropriate cases and alongside bail.

Area for Improvement 9:

The constabulary should improve its governance and oversight of all domestic abuse incidents to make sure it maximises the opportunity to reduce harm to all vulnerable victims.

Area for Improvement 10:

The constabulary needs to make sure its multi-agency safeguarding hub has enough trained personnel to manage current and future demand.

Area for Improvement 11:

The constabulary needs to reduce the ratio of offenders to offender managers.

Area for Improvement 12:

The constabulary needs to make sure all personnel responsible for managing sexual and violent offenders should receive training in specialist digital tools so they can manage risk effectively.

Area for Improvement 13:

The constabulary should make sure the safeguarding children online team reassesses any change to the risk that a suspect poses.

Area for Improvement 14:

The constabulary must make sure supervisors have the necessary training and skills to carry out their role.

Area for Improvement 15:

The constabulary needs to make sure that the professional development review process is effective and valued by its officers and staff.

Area for Improvement 16:

The constabulary should do more to manage and address demand.

Area for Improvement 17:

The constabulary should continue to invest in new technology to help it to increase productivity.

Chief Constable response to report and any Recommendations/Areas for Improvement

This report highlights that the constabulary has many strengths. The Inspectorate has of course identified areas where we can make improvements, which I mostly agree with, and we will work hard to address these, but the positives within the report are many.

The Inspectorate has confirmed that we have sustained our good performance at preventing and deterring crime and antisocial behaviour, which is fundamental for making our communities safer and reducing harm and vulnerability.

I am immensely proud of our neighbourhood policing offer, which HMICFRS have praised. I am pleased that the Inspectorate has recognised that our neighbourhood policing teams are working effectively with their local communities to understand and meet their needs, which is building trust and confidence with the public. The Inspectorate also recognise that we are communicating well with our communities, listening, understanding, and responding to what matters most to local people. The report also identifies that we work well with other agencies, with a common objective of making communities safer. HMICFRS have also acknowledged that we have made improvements since our last inspection in the way we are using problem-solving based approaches to address community issues, which is helping us to develop long-term, sustainable plans which address the root causes of repeat crime and antisocial behaviour issues.

I am also delighted that HMICFRS have assessed that our crime recording is of an outstanding standard when it comes to making sure victims receive an appropriate level of service. We are one of only a small number of forces in the current round of inspections to receive an Outstanding grading for how crime is being recorded. This means that we can have high confidence in our crime statistics, with the most recent Office for National Statistics data release (October 2024) showing that crime has fallen in Norfolk by 9.1%, compared to a national reduction of 3.5%.

HMICFRS also found that we have made significant improvements since our last inspection in how we are recording the reasons why officers are using their stop and search powers, as well as having better internal and external scrutiny over the use of these powers. The report identifies that officers are using their stop and search powers appropriately, fairly, and effectively, which is helping to reduce crime.

I am extremely pleased that HMICFRS have also recognised the significant effort that we have made to improve crime investigation standards since our last inspection, with Roy Wilsher, His Majesty's Inspector (HMI) of Constabulary for the Eastern Region, commending us for the progress that we have made in this area. HMICFRS have assessed that our investigations are well-supervised, effective, and are being carried out in a timely way. Importantly, the Inspectorate have commented that *"Tailored support and timely contact with victims has been at the forefront of how the constabulary is improving investigation management"* and that *"There is a focus on looking after victims and making sure their needs are met during investigations"*.

HMICFRS acknowledge that at the time of our inspection we had the highest positive outcome rate for bringing offenders to justice in the country, and we had a high charge/summons rate compared to other force in England and Wales. Of course, I would like these figures to be even higher and we will continue to exploit opportunities to make

further improvements, including making best use of digital innovation to support the management of criminal investigations.

It is also pleasing that the inspectorate has recognised how hard we are working to create a culture of inclusivity, fairness, and trust within the constabulary, and that our senior leaders are striving to gain a better understanding of workplace culture and how our workforce feels about working for us. This includes our new recruits, who the Inspectorate consider are being effectively supported and retained.

Whilst the report identifies that we need to improve the speed that we answer calls in our Control Room, HMICFRS have also recognised that we are one of the fastest police forces in the country at answering 999 calls, when the public most need us. At the time of the inspection, we were answering 87.1% of 999 calls within 10 seconds, against a national target of 90%. Since our inspection we have maintained this strong performance, which reflects the significant investment that we have made in our Contact and Control Room since our last PEEL inspection in 2021.

Following our inspection in 2021, HMICFRS asked us to make improvements to how we triage calls to achieve a better understanding of risk, and they also asked us to provide callers with more advice about preserving evidence and crime prevention. We have made changes to achieve this, which is acknowledged in our report, but the longer we spend on the phone triaging calls and providing advice, the longer it will take us to get to calls for service that are waiting in our 101 queue.

In the last 12 months, we answered 101 calls in an average of 5:09 minutes. For a non-emergency number, I believe that this is an acceptable waiting time, however at peak times callers are often having to wait longer, and when that occurs some of them are abandoning the call. I want to reduce the frequency with which these call abandonments are occurring, although we believe that many of those who abandon the call do so having heard an automated message informing them that they can report incidents online via our website, but we were unable to prove that to HMICFRS. The Inspectorate has expressed the view that we should be investing in technology to help us to manage non-emergency calls, which I firmly agree with, and we have begun to scope options.

The report also identified that we need to make improvements to how we protect vulnerable people, with HMICFRS expressing concerns around how demand is being managed within our Multi Agency Safeguarding Hub (MASH), how risk assessments are managed in some domestic abuse cases, and our information sharing with partner agencies. This is a priority area for the constabulary. We are striving to improve and have commenced a review of our MASH in response to these findings.

During the early stages of their inspection, HMICFRS raised concerns about how we were managing the risk posed by the growing numbers of sex offenders in the community, along with some concerns around how children at risk of online abuse were being safeguarded. These concerns related to workload demand and training within the Public Protection Unit (PPU) and the Safeguarding Children Online Team (SCOLT), which through investment, have now been resolved, and this was recognised in the published report.

Whilst HMICFRS rightly raised these concerns, they also acknowledged many positive aspects of how we protect vulnerable people, with the inspectorate commenting that *"getting justice for victims of high-risk domestic abuse is a priority for the constabulary"*. They

also gave credit to the enhanced service that victims of rape and serious sexual offences receive from specialist officers, they praised how we comply with the requirements of the Domestic Violence Disclosure Scheme (Claire's Law), made positive comment about our Multi Agency Risk Assessment Conference arrangements, and recognised that we have good process for tracking and understanding preventative orders, which are important tools for reducing risks associated with sexual offending. There was also positive recognition of the consultation that we undertake with victims and stakeholder groups, and how we use learning to improve our services.

Crucially, the Inspectorate recognised that we have strong governance and accountability processes in safeguarding vulnerable people, with HMICFRS remarking that the constabulary *"is making sure vulnerable victims and witnesses are appropriately identified, supported, and safeguarded while it pursues perpetrators"*.

I accept the finding that we haven't invested sufficiently in new technology to help us improve productivity, and that we should be making better use of technologies and digital solutions, such as automation and robotics, to help us manage demand. The Inspectorate did however recognise that we have detailed understanding of demand and that our performance data information is of high quality, which is helping senior managers to make informed decision that meet the needs of our communities and deliver improvements. I was pleased that HMICFRS formed the view that our senior leaders have clear plans and priorities for the constabulary, and that operational activity focuses on these.

The inspectorate found that our financial plans are affordable, and that investment is focused on our strategic plans and priorities, which they believe will help us make further improvements in performance.

While I accept most of the findings in this report, and I am determined to address the issues set out, I must be realistic about the extent of the measures we can put in place. In most cases, investment either in people or technology will be needed to make the necessary improvements, but if we move people from one part of the organisation to address a finding, this will clearly come at an expense to other areas of the constabulary, with demand growing in so many areas of policing. Policing needs additional funding.

I was heartened that HMI Wilsher concluded his summary with the reflection that Norfolk Constabulary is open to acting on the improvements that HMICFRS have identified. We value the inspection activity that they undertake, and their findings help us to improve the services that we provide to the public of Norfolk. I am committed to delivering exceptional policing, and we will work hard to make improvements in the areas that have been highlighted, and to maintain and build upon the many aspects of strong performance that have been identified throughout the report.

PCC response to report and any Recommendations/Areas for Improvement

On 24th September 2024, HMICFRS published their report, "Police effectiveness, efficiency and legitimacy – An inspection of Norfolk Constabulary". I welcome the Inspectorate's observations regarding the excellent work that is being undertaken by the Constabulary with respect to preventing crime and recording crime. The Inspection is positive about a great deal of the work undertaken by the Constabulary including the service that victims of rape and serious sexual offences receive from specialist officers and the way that the service consults with victims and stakeholder groups, and how learning is used to improve. I particularly welcome the observation that the Constabulary has strong processes with respect to safeguarding vulnerable people.

There are however areas of improvement identified as required, and recommendations are made with respect to the Constabulary's work going forward. I welcome many of these as they highlight areas of potential weakness which can be usefully improved.

Recording equality data is identified as a weakness within the Constabulary's crime reporting. In addition, recording crime is sometimes delayed. This is due in large part to the limitations of the recording system used, not only by Norfolk Constabulary, but other forces also. I have held discussions with the Chief Constable regarding this system, the scope for any future or replacement system, and how equality data recording might be improved to ensure disproportionality is considered in an informed way. I expect these conversations to continue over the coming years given the nature of the issue and the limitations of current infrastructure.

While crime data is recorded well, the Inspection notes that data on use of force may not be accurately recorded. There are two ways of interpreting this recommendation. The first, is to take at face value. The second interpretation is that the data suggests that the Constabulary is actually using force less often than other forces, for reasons unknown. The higher than average force incidents resulting in injury may be an indicator of a local difference such as the nature of the risk or threat when force is being used i.e., if force was used in more lower risk incidents thereby increasing the total use of force incidents, the rate of incidents resulting in injury would be lower. If we assume that the 676 incidents resulting in injury have been accurately reported, then the level of use of force that HMICFRS expects would result in a c. 3.9 percent of incidents resulting in injury rather than the outlier position of 8.5 percent of all force incidents currently reported.

Clearly, understanding the actual level of use of force is critical and I am reassured by discussions with Constabulary's leadership team about the work they are undertaking to establish the accuracy of recording data of use of force.

With respect to stop and search powers, the report notes that the reliance on in-person meetings for the stop and search scrutiny community panel meeting may serve as a barrier to people from different backgrounds joining that panel. This is a similar concern to one made in the HMICFRS inspection into activism and impartiality in policing earlier this year. As such, my office will help with the reviewing of vetting thresholds and accessibility thresholds to ensure that these panels are as accessible and representative as possible.

The diversion of neighbourhood officers, and the training provided to them, is identified as a concern. This is reflected in some conversations I have had with officers and is implied in some conversations I have had with members of the public. The need for local policing is well understood and I welcome the inspectorate's observations. At the time of writing, there is uncertainty in the means by which the government intends to deliver on its manifesto commitment to increase neighbourhood policing. I expect that those changes, along with adjustments to training, will change this situation in Norfolk.

With respect to responding to the public, the Chief Constable's consideration of technology to expedite 101 calls is welcome. I would also like to see a means of establishing to what extent if any, the call abandonment rate is catalysed by the in-call message advising about the online reporting. At present, the systems used do not enable this analysis, but it may be that it can be scoped in to future upgrades or system changes.

Answering 90 percent of 999 calls within 10 seconds requires improvement. Yet, according to the report not a single police constabulary meets this target. The report is silent on how this target has been established and the evidence base for it. Discussion with Norfolk's Chief Constable are ongoing and I am encouraged by the work being done to review the digital technology that can better support Norfolk's call handlers. Overall, the current position is that "members of the public should be reassured that if they dial 999 to ask for help from Norfolk Constabulary, the call will be answered quickly."

Despite having strong crime detection rates, the means by which this is achieved in Norfolk is questioned by the Inspection. While there are undoubtedly improvements that can be made to this relatively recently risk-based approach to investigation, I would query the observation regarding "young and inexperienced" officers. While some of the internal communications could be finessed, the strong detection rates would suggest that these are initial bumps in the road which can be expected whenever any new approach is established. The Constabulary's willingness to learn is clear in the ways in which this approach is delivering for victims of crime.

With respect to how the Constabulary approaches investigations, there are elements of the work which rely on the capacity of partners. To this end, observations such as that regarding the sharing of information by the MASH to other agencies is contingent on that information being welcomed and used by those other agencies. In turn, this requires downstream capacity and at present it is not clear that such capacity exists. I welcome the review of the MASH that is currently being undertaken and I will be discussing the need for capacity with partners and agencies across the investigatory and criminal justice systems to affect positive changes wherever possible.

For Office Use Only:

- Response forwarded to the Chief Constable.
- Response forwarded to the Norfolk Police and Crime Panel.
- Response published on the OPCQN website.
- Response submitted to HMICFRS monitoring portal.