

ORIGINATOR: DCC Sanford

REASON FOR SUBMISSION: For Information

SUBMITTED TO: Strategic Governance Board – Tuesday 10 March

SUBJECT: HMICFRS Update Report

SUMMARY:

The attached report sets out the specific current HMICFRS areas for improvement / recommendations for Norfolk Constabulary in relation to -

- PEEL Inspection
- Crime Data Integrity
- Custody Inspection

In addition, there is an update around the national thematic inspection reports where the Constabulary has adopted the findings.

RECOMMENDATION:

For Noting.

INTRODUCTION

- 1.1 The Constabulary is subject to almost continuous review by Her Majesty's Inspector of Constabulary and Fire Service (HMICFRS), and there have been a number of thematic inspections carried out over the period. HMICFRS published reports relating to Norfolk can be found on HMIC website:-

<https://www.justiceinspectorates.gov.uk/hmicfrs/?type=publications&force=norfolk&cat&year>

- 1.2 First three sections of this report outline the progress against areas for improvement highlighted and recommendations in inspections specific to Norfolk;

2. Integrated PEEL Assessment,
3. Crime Data Integrity
4. Update on Custody Inspection

- 1.3 Section 5 covers the recommendations from thematic inspection reports which the Constabulary were not subject of, but have adopted their findings. These recommendations are currently open on the new HMICFRS monitoring portal. Force updates in this report are in dark blue text.

- 1.4 The Force Liaison Officer works with the HMICFRS Force Liaison Lead Inspector to monitor, and close those recommendations that are considered completed by both the Force and the Inspectorate. However, recommendations and areas for improvement may remain in the category of "being progressed" on the monitoring portal after the Force has completed them. In the main this is due to a recommendation/AFIs requiring either a specialist reinspection or action from a national body such as NPCC or College of Policing. Force updates in this report identify if this is the case.

2. INTEGRATED POLICE EFFECTIVENESS, EFFICIENCY AND LEGITIMACY ASSESSMENT (IPA)

- 2.1 As reported in February 2019 Audit Report to the OPCC, the HMICFRS undertook a Police Effectiveness, Efficiency and Legitimacy (PEEL) inspection at the end of 2018. This was the first inspection under the HMICFRS revised approach of Integrated PEEL Assessment or IPA, which combined the previous two-part Spring and Autumn inspections into one. The level of inspection has also become dependent on the HMICFRS using Force Management Statements and data monitoring, to take a 'Risk Based Approach' in deciding

which areas to undertake field work. Norfolk was assessed as being suitable for a reduced fieldwork inspection.

2.2 In November 2018 due to the changes in the policing model and previous AFIs, the HMICFRS undertook inspection fieldwork for crime prevention (Q1) and crime investigation (Q2), in addition to the four mandatory questions vulnerability (Q3), strategic threats (Q5), future demand (Q7) and ethics and counter corruption (Q9).

2.3 The results were published on 2nd May 2019.

2.4 Each overarching Pillar (Effectiveness, Efficiency and Legitimacy) was regraded in the 2019 report, along with gradings for the questions inspected. All other gradings were carried forward from the 2017 inspection and are indicated below.

2.5 **Effectiveness**

How effectively does the force reduce crime and keep people safe? – **Good**

Q.1 How effective is the force at preventing crime, tackling anti-social behaviour and keeping people safe? - **Good**

Q.2 How effective is the force at investigating crime and reducing re-offending? – **Requires Improvement**

Q.3 How effective is the force at protecting those who are vulnerable from harm, and supporting victims? - **Good**

Q.4 How effective is the force at tackling serious and organised crime? – **Good (2017)**

Q.5 How effective are the force's specialist capabilities? *This area is not graded across forces as it related to response to Terrorist Incidents.*

2.6 **Efficiency**

How efficiently does the force operate and how sustainable are its services to the public? – **Outstanding**

Q.6 How well does the force use its resources to meet the demand it faces? – **Outstanding (2017)**

Q.7 How well does the force plan for the future? – **Outstanding**

2.7 **Legitimacy**

How legitimately does the force treat the public and its workforce? - **Good**

Q.8 To what extent does the force treat all of the people it serves with fairness and respect? – **Good (2017)**

Q.9 How well does the force ensure that its workforce behaves ethically and lawfully? – **Good**

Q.10 To what extent does the force treat its workforce with fairness and respect? – **Good (2017)**

2.8 **Areas for Improvement**

The Force also received four areas for improvement:

- 1. The force must ensure that staff with the right skills are investigating crimes thoroughly, leading to satisfactory outcomes for victims. It should review its approach to the provision of investigative training, development and guidance. The force should also consider how a professional lead for investigations would give consistent oversight.**

In January 2019 the Head of Safeguarding and Investigations was appointed as professional lead for investigations. At the same time a Joint Force Investigations Improvement Board chaired by the ACC for Local Policing was convened.

Subsequently in April 2019 a dedicated Investigations Improvement Detective Chief Inspectors role was created to support frontline supervisors. The role identifies barriers to effective investigation and explains the areas for improvement necessary. This is delivered through training, briefings, and the availability of reference material under the operational name of Op Investigate. Aligning to this timeline, Learning and Development have also redeveloped training program for new recruits to include the investigation of crime as a core theme running throughout the program to support this work.

More specifically by October 2019 dedicated training days were in place for all local policing response and beat officers. A coordination group has ensured

best use is made of this training time; investigative standards training was a key priority for the group.

Also starting in October 2019 with a projected end date of March 2020 all frontline supervisors involved in the recording of, or investigations of crime are currently receiving a 3-day input delivered by expert practitioners focusing on improving investigation standards, use of the Force's crime recording system 'Athena' and Crime Data Integrity. New reference material to embed this learning has been provided to officers available both as an app on mobile devices and, in more detail, on a dedicated internal website which can be accessed directly from the intranet home page.

Officers are regularly receiving face to face briefings including key messages on the importance of quality, timely investigations to support victims. These messages are being delivered by Senior Leaders, from the Chief Constable down through districts and commands.

2. The force should improve how it allocates crime, ensuring that investigations are allocated to appropriately trained and supported officers, and that this allocation is appropriately reviewed throughout the investigation

A new Force Crime Allocation Policy was identified as an early priority for Op Investigate and work to generate this took place throughout 2019.

In advance of its publication, the process of daily allocation of prisoners in custody was amended as a result of Joint Justice Services (JJS) review of practice. This revised process ensures that decisions on resourcing of an investigation are based on risk and complexity. Where decisions do not meet this expectation debriefs take place.

The implementation of the 8 Point Plan in Norfolk from July onwards, has brought clear expectations of supervisory review at the point of raising crimes and regularly thereafter affording the opportunity to review allocation.

Throughout autumn 2019 an internal communications campaign was broadcast on the Force's intranet explaining and reinforcing the fundamentals of the 8 Point Plan to front line staff.

The commentary in the 2018 inspection report in relation to high risk DA prisoners was noted and safeguarding support in such cases continued to be provided by specialists from within MASH.

3. The force should ensure regular and active supervision of the quality and progress of investigations. This supervision should be properly recorded.

The issue of supervision was noted to be particularly acute in uniformed policing. Every sergeant supervising crime has been visited by the Op Investigate team for personal coaching on how to effectively review crime and the importance of doing so.

The introduction of the 8 Point Plan allowed a clarification of expectation of supervision and review of crimes. Review frequency was set at 21 days with clear guidance on what was to be included. This is now monitored by audit from the Op Investigate team.

In addition to supervisor review expectations, a new method of crime audit was introduced in 2019. Inspectors in local policing take on audit responsibilities for a range of crime with questions targeted at key areas of compliance. Results are reported to senior managers monthly. In 2019 a baseline based on over 1000 crimes across all districts was established to which improvement can be assessed. More recently the audit framework has been assessed and amended to focus on key areas of concern and also areas where new processes are expected to lead to improvements. These audits will continue to report monthly to enable progress to be tracked.

In addition, the Investigations Improvements Team continue to audit the work of individual sergeants following training events, checking specifically for compliance with timely setting of action plans and the provision of meaningful, regular crime reviews.

Investigation quality is also tracked through the Joint Force File Quality Board which can now provide data at team level for the acceptance rate of CPS file submissions as a key indicator of quality. There is also a pilot ongoing (with interim evaluation) of an Investigations Improvement Officer role at the Forces' busiest PIC to ensure availability of advice to less experienced officers throughout a large proportion of the working week.

4. The force should ensure its counter corruption unit has the capability and capacity to be effective in its proactive approach to counter corruption – and has full information technology (IT) monitoring to effectively protect the information contained within its systems

This has been acknowledged by the Force and is being progressed by DCC Sanford.

2.9 IPA 2

The 2018/19 inspection was the first under the HMICFRS revised approach of combining the previously two-part inspection into one. Due to the work and size of the revised regime, the programmes no longer run in financial years and forces were split into three individual tranches. In 2018/19 programme, Norfolk were in Tranche 1 and so were first in the programme. Although the IPA1 programme was titled a 2018/19 it was an 18-24-month programme which IPA 2 will commence Spring 2020. Although there will be no tranches, it will be a rolling programme and the Force has not yet been informed of an inspection date. However, it is anticipated as Suffolk is the Force's preferred partner and is a pilot Force, Norfolk's inspection work will begin later in the year.

3 CRIME DATA INTEGRITY (CDI)

3.1 In July 2019 the Force was subject of an unannounced Crime Data Integrity (CDI) inspection. The inspection comprised of two parts., firstly an audit to assess the Force's level of National Crime Recording Standards compliance took place. The period of audit was 1 November 2018 to 30 April 2019. The second part involved in-force fieldwork, where inspectors assessed staff understanding and culture regarding crime data integrity, and the Force's progress against its action plan and the recommendations from the 2014 inspection.

3.2 The report was published in January 2020 and the overall judgement was "requires improvement", the Force's overall compliance was 87.5% and was given an "inadequate" grading. Nevertheless, the inspectors acknowledged that the Force has made concerted positive efforts with CDI and has improved its compliance since 2014. It was also noted that there has been a comprehensive framework of leadership and audit to oversee and track these efforts, but despite this compliance needs to further improve. The Force acknowledged that to continue this journey, it now needs to prioritise further financial investment in its processes to improve compliance. The Force was also praised for its openness and understanding of the challenges, and the Force was graded "Outstanding" for its leadership and management.

3.3 The individual judgements were:

How effective is the force at recording reported crime? – **Inadequate**

How efficiently do the systems and processes in the force support accurate crime recording? – **Requires improvement**

How well does the force demonstrate the leadership and culture necessary to meet the national standards for crime recording? – **Outstanding**

3.4 The Force also received three recommendations and six areas for improvement. These areas have been added to the Force's improvement plan and progress is monitored monthly by the Gold Crime Data Integrity Group.

3.5 **Recommendations:**

The force should immediately:

- 1. take steps to identify and address gaps in its systems and processes for identifying and recording all reports of violent crimes (in particular those related to domestic abuse);**

The Department for Local policing immediately established an interim Crime Data Integrity Quality Assurance Team (CDI QAT) to review incident logs for compliance. Located in the CCR the team are able to review calls for service at the Force's primary route in for crime reporting.

Having reviewed the effectiveness of this approach, a business case was submitted for one supervisor and nine Quality Assurance staff. In addition, funding was agreed for a CDI Improvement Advisor who will review trends and support continual improvement of compliance throughout the Force. The whole team establishment is expected to be fully recruited to by autumn 2020.

When at full complement, the team will have the capacity to review all violent and domestic crimes as well as all domestic incidents. The areas of work for the team will be dynamic and informed by both the audits of the Force Crime registrar and the ACC chaired CDI Gold Group to target areas of concern; for example, where recording rules have changed or are particularly complex.

Training is also an integral part and all CCR staff have received training by the new Improvement Advisor to improve their understanding of CDI and ensure crimes are raised prior to any Cad closure.

The second key area for quality assurance in the process, is the Investigation Management Unit (IMU) and staff are also receiving a 5-day training course in

the Spring. This will be focused on key areas of risk such as the requirement to record a second investigation where issues of harassment, stalking, coercion and control are reported in addition to another crime. There will also be enhanced training to cover the conversion of a non-crime domestic reports to a crime investigation where crimes are identified but not compliant with Home Office Counting Rules.

- 2. provide further crime recording training for all supervisors, officers and staff working in a crime recording role, to include the recording rules for common assault, harassment, malicious communications, coercive and controlling behaviour, and stalking;**

make sure that it adequately supervises all crime recording decisions made by officers and staff.

Every Sergeant in Norfolk will receive 3 days mandatory training which broadly focuses on the following areas.

- When to record a crime
- Applying correct outcomes when finalising a crime
- Victim Service
- Suspect management
- Supervising investigations
- Athena Case Management

Day one entirely focuses on CDI, specifically on areas identified through internal audits as high risk of non-compliance; common assault, harassment, malicious communications, coercive and controlling behaviour, and stalking.

To take key messages to the front line, as part of the County Policing Command Development Days, a 60-minute input is given to understanding harassment, malicious communications, coercive and controlling behaviour, and stalking and how CDI is integral to ensuring a good service to victims. This is co-delivered by the Inspector responsible for Safeguarding development and CDI Improvement Advisor.

A specific package is currently being prepared for Safeguarding & Investigation Sergeants to deliver a CDI/Victim Code of Practice package to their Detective Constables and Police Staff Investigators. A more bespoke training delivery will be completed for those Police Staff Case Investigators that attend Child Protection Conferences covering responsibility for third party reporting. These training packages will be mandatory for these specialist roles.

3.6 Areas for Improvement

The force should immediately make sure that it:

- 1. reviews its backlog of crime records waiting for validation, acts appropriately to deal with the backlog, and validates records promptly in the future;**

The IMU is now fully staffed in line with the 2018 business review of the department. Since the uplift, from the 18th November, the unit has achieved a weekly reduction in the crimes awaiting IMU validation. On the 6th February the number of Investigations awaiting validation was under target, and remains so.

On the 13th February 2020, there were 81 crimes awaiting validation against a total of 500 Investigations recorded that day.

Plans are in place to manage any increases in the daily load coming into the IMU during 2020, mainly additional trained resources.

- 2. always records reports of crime received from professional third parties**

Recording of crime from reports made by professional third parties forms part of CDI training to frontline staff on CPC training day, and also CDI Sgt 3-day training. This includes learning to improve understanding of who are regarded as a professional third party and therefore able to report crimes on behalf of victims.

Within the Multi Agency Safeguarding Hub (MASH) environment, referrals are sent to the Child and Adult desk where crimes are identified, created and linked by dedicated MASH IMU staff. These referrals are sent onward for Strats in the MASH, and crimes identified and allocated to the appropriate resources for investigation.

- 3. improves understanding of N100 classifications among its control room staff;**

All CCR staff have received bespoke CDI training by the CDI Improvement Advisor.

The Rape/N100 Standing Operating Procedure and other learning materials have been refreshed to ensure they provided high quality, easy to understand information to call handlers at the point of decision making. A number of staff awareness initiatives have been undertaken to consistently raise the importance of this issue with staff.

Further staff training is planned for 2020.

The reintroduction of team tutors into the room has been identified as key to raising standards. The tutors will receive enhanced training in order to ensure they have a high degree of CDI knowledge in order to act as additional layer of supervisory oversight to support staff in achieving high standards.

When fully established, the colocation of CDI QAT will provide expert advice between 0700 - 2000.

4. records more crimes within 24 hours as required by the national crime recording standard;

The Force has a number of workstreams under the department for local policing change programme which involve recording and processing volume crimes. The terms of reference for these workstreams all include the mandate of improving crime recording timeliness and accuracy which can be attributed to business benefits.

5. informs victims if their crime is transferred to another force for investigation or is cancelled; and

At present there is a process issue in Athena that means when a crime is transferred, once accepted it is automatically closed. As a consequence, if the crime is held by an OIC on their workload it is their responsibility to inform the victim. However, Athena automatically files the record and removes it from that officer's workload when transferred.

The Norfolk and Suffolk have a business process to remedy the issue and ensure victim code/HOCR compliance,

IMU create a task for the foreign Athena Force transfer and register an interest instructing the OIC to inform the victim of the new Investigation reference number before de-registering the Interest which has been directed to them. It has been identified that this is reliant upon the OIC doing this before they deregister the Interest and this will be included in future investigative training.

For serious offences, the IMU oversee the action that the victim is updated.

6. improves how it collects diversity information from crime victims and uses this to inform its compliance with its equality duty.

Athena is not currently configured to record all protected characteristics in a searchable format; a change request would be required in order to achieve this.

A solution has been identified where Equality and Diversity could be recorded on Storm, this would have the added advantage that data could be collected against all call types and not just crimes.

This solution would need to be introduced alongside a Customer Relationship Management (CRM) system. Storm has a CRM call card option built-in which could be utilised for this purpose. However, the use of a CRM for the collection of Equality and Diversity data is likely to extend call length. This could be mitigated based upon how it was implemented; for example, not collecting Equality and Diversity data during peak demand periods.

This is currently being explored through the CDI Gold Group.

4 NORFOLK AND SUFFOLK – JOINT INSPECTION OF POLICE CUSTODY

- 4.1 As previously report in 2019 Annual report, in May 2018 the Force was subject of an unannounced Custody inspection. This was an inspection of both Norfolk and Suffolk custody provisions – the Police Investigation Centres (PIC). The Inspection was led by Her Majesty’s Inspectorate of Prisons as part of the rolling joint inspection programme with the HMICFRS. The report was positive, and made only two recommendations with nineteen areas for improvement. All have been considered, and progressed where appropriate by the Joint Justice Command (JJC). An update on these recommendations is contained in appendix A.

5. HMICFRS MONITORING PORTAL

5.1 In addition to force specific areas for improvement, the Force currently has a number of recommendations and areas for improvement open on the HMICFRS monitoring portal (previously the recommendations register). The below table gives an overview of the Force's position over the last 12 months.

Report	AFIs ¹	Recs	Live	Comments
Crime Data Integrity (National & Force) (2014)		11	11	These will be closed as a result of the more recent inspection findings.
The depths of dishonour: Hidden voices and shameful crimes (2015)		3	1	Awaiting review and closure
Building the picture: an inspection of police management information (2015)		8	4	
National Child Protection (2016)			0	Closed
Progress on Domestic Abuse (2016)	6	1	0	Closed
Stolen freedom: the policing response to modern slavery and human trafficking (2017)		6	0	Closed
PEEL (2017)			0	Closed
Understanding the Difference - The initial police response to hate crime (2018)	0	6	3	
Policing and Mental Health: Picking up the Pieces (2018)	0	4	3	
Fraud: time to choose: An Inspection of the police response to fraud (2019)	5	2	1	
The poor relation: The police and CPS response to crimes against older people (2019)	1	4	3	
Spotlight: Shining a light on Betrayal (2019)	0	5	3	
Cyber: Keep the light on (2019)	0	1	1	

Details of the recommendations and the Force's progress against them can be found in appendix B.

¹ Areas for Improvement were not previously tracked by the HMICFRS on the Monitoring Portal. As a consequence, not all AFI's are included on the monitoring portal. However, these are tracked in force and where applicable have been included.

Recommendation 1

The force must take immediate action to ensure that all custody procedures comply with legislation and guidance, and that officers consistently implement these. Quality assurance should be applied to test compliance with the legislative requirements.

The Custody Command has taken immediate action to remedy the quality of Inspectors' reviews by producing an Inspectors briefing called the 7 min guide. This has been provided electronically and also through face to face updates to Norfolk Inspectors Development days. Additionally, updates on Bail and RUI have been provided to ensure legislative compliance.

A full audit of inspectors' reviews has been undertaken with guidance and training being offered to Inspectors from both Norfolk and Suffolk for those who required it. A monthly audit and inspection regimes are now in place to monitor governance and compliance from a quality assurance point of view. Innovations are being explored around PACE reviews by video conference to undertake this role. This would be the most efficient way possible, recognising the significant wider demands on the inspecting ranks.

Recommendation 2

The constabularies should strengthen their governance of use of force by ensuring that all incidents involving force in custody are properly recorded and are in line with recommendations from the National Police Chiefs Council. Incidents should be cross-referenced to CCTV to demonstrate that the force used is proportionate and justified.

Currently there is no ability to align Use of Force (UoF) reporting and custody systems. This is currently a national issue which is reflected locally and in order to mitigate hidden risk in this area, the Force are undertaking a number of steps:

UoF now features as a mandatory dip sampling for all PIC Inspectors to cross check on UoF systems

A newly formed (January 2019) Coercive Powers Independent Scrutiny Panel look at this issue from January 2019 with a focus on Sec 54 Strip Search Powers.

A new custody development day will have UoF recording as a mandatory refresher.

Through inspection of the rationale provided by custody Sergeants, the Independent Strip Search Scrutiny Panel has overseen the rise in compliance to new compliance of 90% in Sec 54 authorisations. A new policy on removing the option of using rip proof clothing has been rolled out to all custodies effective Dec 2019 which has seen reductions in confrontations and consequently use of force applications. The Force is awaiting a new use of force recording system which will directly pull together all applications of force during a single incident. The audit and inspection regime continue to give this issue focus.

Areas for Improvement

- 1. The forces should ensure that the accuracy, collation and monitoring of data on key areas of custody is sufficient to assess performance, identify trends and drive improvements.**

A new performance framework is now in use with data quality integral to the plan. This is a market leading product recognised by NPCC Custody form as in advance of the progress most other forces have made on this issue. Trends are now very easily picked up on, driving important lessons learned back into the command in a very agile and immediate way which is in turn driving significant improvements.

- 2. The forces should ensure that custody records are comprehensive and clear and that all decisions are appropriately justified and clearly recorded. Multiple cell checks should not be entered in individual detainee detention logs.**

The JJC Command does not agree with the area for improvement around multiple cell checks as there is an efficient staffing model which provides for quality checks based on the Force's ability to use technology in an efficient way. Data quality dip sampling by PIC Inspectors can be viewed on request.

- 3. All staff should ensure that the individual and diverse needs of detainees are consistently met, particularly those of female and transgender detainees.**

A new Transgender Toolkit was launched in December 2018. To review the response to this from custody a Custody Sgt lead has been identified, and LGBT+ network lead Sgt Oliver Aldred at Martlesham PIC to introduce a new Learning and Development package to roll out to all staff early in 2019. The Force's Independent Advisory Panel includes an action lead for LGBT+ issues and gender issues who will be consulted on the package

4. Female Sanitary Provision is available across all PICS and is offered in a discrete way by all staff

The changes to PACE for female hygiene questions were embedded long before the date they became compulsory allowing us to allocate discrete questioning of female detainees by members of team of the same gender. A new Command Diversity Lead at Inspector level has been appointed to oversee the ecosystem of diversity issue response and compliance.

5. Anti-rip clothing should only be used in exceptional circumstances and following an individual risk assessment

Anti-rip clothing has now been removed as routine option in all but the most serious of cases. As such its use in the first two trial PIC over a two-month period reduced to nil. This was rolled out in December 2019 Command wide, and compliance is being monitored. This links to recommendation 1 & 2 and subject of new performance framework due April 2019

6. The forces should make suitable alternative arrangements for voluntary attendees so they do not have to be brought into custody

The Voluntary Attendance Policy has completed its consultation and is a live policy. The app to support the policy has been delayed from its previous completion date of June 2019, due to other more significant IT projects. However, there is a renewed projected completion of February 2020.

7. Delays in progressing investigations while waiting for interpreters and/or AAs should be minimised.

The Force was able to changed service provider due to ending of contract, since the 2018 inspection. CAPITA translation no longer provides the face to face contract due to delays. An enhancement with CINTRA is now in place. There are no delays with the ACT AA Service.

8. The force should strengthen its approach to PACE reviews by ensuring:

- **all PACE reviews include the detainee's care and welfare needs, which are fully and accurately recorded**
- **that acting inspectors are authorised to carry out duties of a higher rank when conducting detention reviews in accordance with section 107 of PACE.**

See recommendation 1.

9. The forces should ensure that responsible individual officers update RUI suspects and that there is effective supervision to ensure investigations are conducted as quickly as possible

The joint Bail and Released Under Investigation (RUI) Strategy Group is chaired by the head of JJS and a new 7-minute guide for Inspectors was published December 2018.

The tactical response to bail is under Inspector Beeby, who leads the Bail Management Team consisting of two Sgts and one support staff post. The team oversee and ensure bail cases are well managed.

In addition, there is a new ATHENA module for Bail and RUI being released in Spring 2020 which will effectively ensure a better oversight and rigour of RUI cases.

10. Drugs for use in medical emergencies should align with the health care provider's policy, and the range of kit should be reviewed to ensure it is suitable

Medical Services Review - new Contract and provider has been implemented; from April 1st 2019 - all medical dispensing is now only undertaken by a Health Care Professional

The Force is now fully compliant working with CRG Medical.

11. The forces should offer detainees replacement shoes when their own footwear is removed and access to showers, hand-washing facilities, exercise and a selection of reading materials. Toilet paper should be in their cells except where there are risk assessment indicators.

This area is currently compliant and is subject to Inspectors and Chief Inspectors monthly and six-monthly checks

12. The forces should continue to work with partner agencies to ensure that children charged and refused bail are moved to alternative accommodation.

Following on from the work of the two ACC's Strategic work, the tactical lead for 2019/20 Insp Helen Howes leading on this area of business. She continues to link in with the two ACCs for Local Policing in Norfolk and Suffolk who have strategic oversight for Children and Young People. Tactical meetings with heads of YOT and Children's Services are held regularly to discuss those cases not transferred to review decision making. Still no secure accommodation in either county.

13. All detainees should receive equitable access to primary care services in custody suites

14. Governance arrangements should be improved, including in areas of policy for police custody, leadership, responsiveness, clinical supervision, clinical supply chain reliability, access to online resources and service user consultation. Systems for clinical waste disposal should be suitable and labels completed

Medical Services Review - new Contract and provider from April 1st 2019 - Castle Rock Group (CRG) with an uplift of £300k in contract provision for 24/7 care at all six PICS.

CRG are now embedded into the Command and the Force is fully compliant.

15. Medications due for administration while detainees are at court should be sent with them.

16. Custody officers should not administer prescription-only medication without a signed medical prescription.

Now fully compliant on 15 and 16.

17. Detainees with substance misuse issues should have access to specialist services

The Command has a new drug testing on arrest policy which has been rolled out to both Norfolk and Suffolk. There are contract arrangements in both counties through

Public Health and their commissioned partners CGL for assessment and treatment of drug users.

18. Detainees requiring Mental Health Act assessments should be seen promptly, and transfers to hospital facilities should be expeditious

All Mental Health cases are currently reviewed but there is not currently the strength in the current performance framework to do this efficiently - improvements are planned to commence April 2019.

The Force is confident that Custody Bronze Inspectors are empowered to deal with this issue when mental health assessments are unduly delayed due to staffing problems in the local Mental Health Trust

This has continued over the last 18-months and there are good escalation routes to the Norfolk and Suffolk Foundation Trust when timeliness becomes a problem.

19. The forces should continue to work with HMCTS to ensure that the time detainees wait for virtual court appearances is minimised, with cases prioritised appropriately. Where detainees are remanded to prison they should be transported there without undue delay.

PS Simon Rose has taken up a funded paid post in London SE VAA.

Additional funding was given for five Embedded Virtual Court Detention Officers and new process from April 2019 have provided us the opportunity to send over eighty of remand cases to court virtually. The model is working very well.

THE DEPTHS OF DISHONOUR: HIDDEN VOICES AND SHAMEFUL CRIMES (2015)

By June 2016, chief constables should ensure that information management processes are in place to record and flag HBV, FM and FGM information in an efficient, effective and systematic way so that the risk to individual victims is identified at an early stage and properly assessed and managed throughout the progression of victim's case.

Proposal for use of Athena to record Honour Based Abuse (HBA) cases now in existence for review and comment prior to progression. Currently the HBA CATs system is secure so the Athena solution will just need to replicate this security of access.

This recommendation will be subject of review by the FLL in the near future to assess if it is suitable for closure.

BUILDING THE PICTURE: AN INSPECTION OF POLICE MANAGEMENT INFORMATION (2015)

By 30 November 2015, chief constables should ensure that a review is undertaken of the way in which their forces' information management policies and practice comply with the APP on information management so that they give effect to the national approach and minimise any divergence from that APP.

The Force is developing Genie/Clearcore to support this process, all policies and procedures are aligned with Authorised Professional Practice (APP) and any divergence has been documented. Once systems are in place the Force will be able to have a greater understanding of its compliance with the relevant APP.

By November 2015, chief constables should ensure that adequate local information management processes are in place to consider all available information in an efficient and systematic way so that the continuing levels of risk that individuals pose to communities are properly assessed and, where necessary, information is recategorized and linked.

The Athena system provides automated application of Management of Police Information (MoPI) groups this is currently being reviewed to see if this is to be brought in line with the APP. A manual update of the MoPI group can be undertaken. When completed Genie/Clearcore will prompt the MoPI analysts to complete the required reviews.

By November 2015, chief constables should ensure that their local information management processes adequately identify and prioritise the records of those who pose the greatest risk, in order that they are properly monitored, and appropriate, timely action is taken.

Immediately, chief constables should make sure that their force information records are reviewed at the end of the review period set for each information grouping, and records created when decisions are made to retain information beyond the applicable period of retention.

The Athena system provides automated application of MoPI groups this is currently being reviewed to see if this is to be brought in line with the APP. A manual update of the MoPI group can be undertaken. When completed Genie/Clearcore will prompt the MoPI analysts to complete the required reviews.

LIVING IN FEAR (2017)

Within six months chief constables should ensure that forces record stalking or harassment crimes if appropriate when victims report breaches of orders.

Within six months the National Police Chiefs' Council (NPCC) lead and the CPS lead should consider whether they can do more to inform police officers and lawyers of the importance of treating breaches of orders as evidence of a wider pattern of offending, and when and in what circumstances officers and lawyers should treat this as further evidence of stalking or harassment.

Considering whether a crime of Stalking and Harassment should be recorded in addition to breaches of orders, has been communicated to staff, and forms part of guidance documents. It has been highlighted from National Lead in 2019, and is part of the Safeguarding and Investigations' Departmental action plan for Stalking

recommendations. This is covered in the CPC training days as part of CDI Stalking input, and is made clear in the Stalking Intranet page.

A power BI dashboard is being developed by SBOS to provide monthly Stalking stats, of which Order breaches have been requested. This will enable a regular overview of the number of breaches recorded, and assist with audits.

UNDERSTANDING THE DIFFERENCE - THE INITIAL POLICE RESPONSE TO HATE CRIME (2018)

We recommend that within three months, chief constables make sure that the Home office cyber enabled flag is consistently applied, and that forces have adequate systems in place to make sure that this is done.

Following a Metropolitan Police led development event, the Equality and Diversity Manager is writing a 60 second brief to enable officers and staff to better understand online/cyber reports, how to report them and how they should be dealt with. The team are also working with SBOS to ensure that the Hate Crime quarterly document they provide includes this data so commanders are aware of the picture on their area.

We recommend that within six months, chief constables work with partner organisations to adopt a system of risk management for vulnerable victims of hate crime. The NPCC lead for hate crime and the college of policing should give chief constables advice about how best to do this. They should also consider whether the principles of the multi-agency risk assessment conference (MARAC) process are a good way to management risk to hate crime victims

And

We recommend that within six months, chief constables incorporate risk management into a risk assessment process for vulnerable victims of hate crime. The NPCC lead for hate crime and the College of policing should give chief constables advice about how best to do this

The Stop Hate in Norfolk (SHiN) 3rd party reporting protocol is currently being reviewed. The protocol has the facility for any party/stakeholder to call a multi-agency meeting to discuss risk management of a victim.

In the summer/autumn of 2019 the Force piloted a new risk assessment for hate incidents. The results are currently being evaluated and an officer survey is being sent to those who complete risk assessments.

The Force is waiting for guidance on whether there will be a move to a national risk assessment. Also, national operational guidance is being reviewed and rewritten and this is awaited before introducing a new mechanism for Norfolk. The Force continues to work both internally and externally with colleagues and stakeholders to ensure that risk around hate is recognised and recorded appropriately. The Equality and Diversity team will be working with Operational Partnership Teams on new training designed to help staff to recognise the subtleties that relate to hate and discrimination in the community.

POLICING AND MENTAL HEALTH: PICKING UP THE PIECES (2018)

By December 2019, forces should develop a better understanding of their mental health data, and the nature and scale of their demand. All forces should carry out a 24-hour snapshot exercise, using the new national definition of mental ill-health in Recommendation 1. This would help them see where their mental health demand is concentrated and identify any gaps in their data. The NPCC mental health lead should set out how the data was collected during the Welsh forces' snapshot exercise.

This exercise will help forces understand the strain on the service by assessing the combination of demand and workload. This will then help forces when establishing and reporting mental health demand in their force management statements (FMSs).

The College of Policing led 24-hour mental health demand snapshot exercise took place on 12th November. The Force completed its return in full, submitting data to the College by the specified deadline. The College of Policing are collating the data returned by all forces to provide a national MH demand snapshot overview. As yet the Force has not received any further details from the College. SBOS have produced an infographic based on the data collected during the 24-hour recording period.

This recommendation is awaiting closure

By August 2019, all forces should review their existing partnership mental health triage services to assess their effectiveness, and the environment they are operating in. This

will help them make decisions about sustainable future services with partners to make sure mental health care needs are being met.

If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable.

The College of Policing has agreed to devise some practice guidelines to help forces benchmark their triage activity. We will inspect on progress in this area as part of our integrated PEEL assessments inspection framework.

The College of Policing have not yet published the awaited guidance. A workshop was held with a small number of forces on 11th December 2019 with the intention of finalising an evaluation framework which would guide forces. The outcomes of this workshop have not yet been shared with forces and as such the Force hasn't yet commenced any evaluation of its Control Room based MH triage team. A piece of work has been undertaken to look at CCR mental health related demand which has shown a clear need to extend the hours of the triage team. The Force has secured some 'NHS Winter Pressures' money which has allowed an extended hours pilot to be undertaken. The nurses are currently working until midnight at weekends and on some weekday evenings. This pilot will continue until 31st March 2020 and will inform the future service model.

By August 2019, all forces should review their mental health training programmes, using the College of Policing learning standards, to establish whether they are giving their officers the right tools to understand and respond to people with mental health problems.

If forces find any deficiencies in their training programmes, they should take steps to address them as soon as reasonably practicable.

Where forces invite outside organisations to train staff, they must make sure its content and quality are checked against College of Policing APP

A training package is now being delivered as part of the CPC Masterclass days. The module is called "Providing a First Response to Mental Health Incidents". It is a 2 ½-hour input based on the College of Policing Learning Standards. Feedback received from officers who have received the input to date has been very positive.

This recommendation is awaiting closure

FRAUD: TIME TO CHOOSE: AN INSPECTION OF THE POLICE RESPONSE TO FRAUD (2019)

Recommendations

By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime and chief constables should ensure that forces have processes in place to accurately and efficiently report fraud outcomes to the National Fraud Intelligence Bureau.

A recent strategic review of Fraud has identified that both automated and manual processes are used to submit outcome data to NFIB. The two processes exist as a means of ensuring that all possible outcomes are reported to NFIB despite known limitations to each method (ie, it is known that some records are included in one but not the other return and neither method captures all outcomes). A recommendation from the review, once enacted, will ensure that a single automated method will capture all relevant outcomes.

By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).

A revised force policy was published in draft by 30th September and has now been updated following consultation returns to full policy status. It is available online at:

<https://www.norfolk.police.uk/sites/norfolk/files/fraudallocationandinvestigation.pdf>

Ensure their forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud

The capability to map OCGs with fraud as the primary criminality continues to exist but there are no current groups that fit this criterion.

Ensure that fraudsters are included among those considered for serious organised crime 'prevent' tactics, including by local strategic partnership boards and through integrated offender management processes.

The Local Organised Crime Board has adopted Criminal Finance (including Fraud) as a strategic priority for 2020 and a 4P plan is under development. In addition, the constabulary is a key contributing member of the Norfolk Against Scams Partnership which does considerable amounts of work to raise awareness of fraud trends and build resilience against fraud offences.

Increase their force's use of ancillary orders against fraudsters;

As at 12/2/2020 RECU are actively working in support of 112 live fraud investigations in Norfolk. This support is based in each case on working with the OIC to trace the flow of money from victim to suspect and in preparation for confiscation of cash and assets from suspects to enable compensation to be paid post-conviction.

Ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.

The work under the Victim's Code of Practice group continues. As part of the Force's wider improvement plan for crime investigations a number of crimes from across the Force are audited. A review of the audit questions in January 2020 has strengthened the section covering the Victim's Code.

Improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support;

The Scams Prevention Service is a multiagency partnership which has replaced the Op Bodyguard pilot in Norfolk. The police co-ordinator uses both Action Fraud victim data and direct referrals to assess fraud victims against a developed matrix. Victims identified as vulnerable receive a home visit from dedicated special constables and police support volunteers who have received specialist training. Victims who do not meet the threshold receive telephone advice. If no contact can be made, an email is sent offering general scams prevention advice. An Athena Adult Protection Investigation is added in respect of the most vulnerable victims, whether or not a home visit is completed

CRIMES INVOLVING OLDER PEOPLE (2019)

The police don't consistently assess the needs of victims as set out in the relevant codes of practice and so the needs of victims aren't always met.

Recommendation

Within six months, chief constables should make sure that victim needs assessments are always completed.

The Supporting Victims Sub Group led by the head of JJS is looking at the processes in relation to Victim Code of Practice (VCOP) and considering police compliance with their responsibilities under the Code. Needs assessments are in part completed through THRIVE assessments at the time calls are directed through the CCR and also when crimes are inputted into Athena by the recording officer. These processes are under review to assess conformity with required standards.

Work is underway to reinforce the police responsibilities in relation to VCOP with specific victim champions being nominated in each district and department, bespoke material is being circulated for onwards cascading. This material also forms part of the Op Investigate training in each force. Part of this work involves work to consider needs assessments of victims at the point of investigation. Whilst in a lot of cases this information is being collated it is not being appropriately recorded on Athena. Part of the material used to highlight VCOP responsibilities includes direction about this and the importance of recording.

Chief constables don't understand well enough the current demand for adult safeguarding arrangements, and haven't considered the likely future demand and the implications for forces.

Recommendation

Within three months, chief constables should conduct analysis of the current and future demand for adult safeguarding, including the gap in knowledge that may exist from those cases where referrals aren't made because of errors or omissions. This analysis should be incorporated into force management statements (FMSs).

At the time the report was published Chief Officers had already signed off an SBOS plan for a strategic profile to look at older people. The Strategic Analysis Team are developing the terms of reference for this profile ensuring it takes into consideration the report's finding. As a minimum the profile will look at:

- a. Current demand - victims and offenders
- b. Predicted future demand (ageing population / changing nature of threats – i.e. Fraud)
- c. Impact on partners (and their impact on our demand)

Some victims may not be receiving support services, and some support services don't work as well as they could. This is because the police don't always refer victims when they should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately.

Recommendation

Within six months, chief constables should work with police and crime commissioners and their mayoral equivalents, and other relevant organisations, to review whether victim support services can be provided in a better way.

The existing opt out model remains and reported figures are consistently high. Officers and staff are inappropriately referring people to the VSS service when they have not been asked whether they would like to receive support or not.

This aspect continues to be addressed through ongoing communications to all members of the organisation and will be reinforced through the victim champions model. Although referrals do include a number of vulnerable and elderly victims, generally support is arranged, and referrals are made directly from the MASH through the Adult Safeguarding team.

SPOTLIGHT: SHINING A LIGHT ON BETRAYAL (2019)

By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.

A resourcing bid has been submitted to the Outcome Based Budgeting process. The outcome is waited for the next financial year.

CYBER: KEEP THE LIGHT ON (2019)

Chief constables should evaluate the use that their force makes of cyber specials and volunteers to ensure that they are used effectively.

Specials on the National database are used for bespoke skills (Duty Sheet), and evaluation of local Specials with specialist skills will continue to take place to ensure they are being used appropriately.

A meeting has been arranged for late February 2020 with a number of Specials identified, to discuss ways in which to fully utilise the skills they have.

END.

ORIGINATOR CHECKLIST (MUST BE COMPLETED)	STATE 'YES' OR 'NO'
Has legal advice been sought on this submission?	NO
Have financial implications been considered?	NO
Have human resource implications been considered?	NO
Have accommodation, ICT, transport, other equipment and resources, and environment and sustainability implications been considered?	NO
Have value-for-money and risk management implications been considered?	NO
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	NO
Is the recommendation consistent with the objectives in the Police and Crime Plan?	NO
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	NO

PUBLIC ACCESS TO INFORMATION: *Information contained within this submission is subject to the Freedom of Information Act 2000 and wherever possible will be made available on the OPCC website. Submissions should be labelled as 'Not Protectively Marked' unless any of the material is 'restricted' or 'confidential'. Where information contained within the submission is 'restricted' or 'confidential' it should be highlighted, along with the reason why.*