



Norfolk Police and Crime Commissioner (P C C) response to inspections of Norfolk Constabulary published by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (H M I C F R S)

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 to recommendations in inspectors reports within 56 days.

Inspection Title:

PEEL 2021/22: An inspection of the eastern regional response to serious and organised crime.

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PEEL, Regional Organised Crime Units and Serious and organised crime.

Police Forces:

Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Kent, Norfolk and Suffolk.

Link to Report:

[HMICFRS Inspection of the Eastern Regional Response to Serious and Organised Crime](#)

Section 55 Response Deadline:

14 July 2023

Key Findings

As part of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) police effectiveness, efficiency and legitimacy (PEEL) inspections, they inspected how well police forces tackle serious and organised crime (SOC). In 2022, HMICFRS changed how they inspect this aspect of policing, to incorporate inspections of the ten regions, as well as the

nine regional organised crime units (ROCU) throughout England and Wales, and the 43 police forces.

Within the inspection of the eastern regional response to serious and organised crime; HMICFRS include sections on the following:

- Regional findings – a summary of inspection evidence that identifies good or poor performance within the region; in other words, involving or relating to the ROCU and its constituent forces. The performance of the region is not given a graded judgement. Instead, HMICFRS highlight areas for improvement, causes of concern and innovative and promising practice in this section, where applicable.
- The ROCU and individual forces – the ROCU and each individual force are given a graded judgment, with a summary of the findings from HMICFRS' inspection and highlighted sections for areas for improvement, causes of concern and innovative and promising practice.

The Strategic Policing Requirement defines ROCUs as 'the primary interface between the National Crime Agency (NCA) and policing, supporting the co-ordination and tasking of the collective effort against the serious and organised crime threat'. ROCUs should lead the operational response to serious and organised crime on behalf of forces within their regions, and police forces should work closely with ROCUs, following the objective set out in the national serious and organised crime strategy to achieve a whole system approach.

The data used in this report was extracted from the national database: the Agency and Partners Management Information System (APMIS). APMIS contains data that is recorded by police forces throughout England and Wales, ROCUs, the NCA and other agencies, such as His Majesty's Revenue and Customs and Home Office Immigration Enforcement.

HMICFRS' previous PEEL inspection reports have referred to how well forces have managed and mapped or assessed organised crime groups (OCGs). In this report, the inspectorate refers to SOC threats, which encompass OCGs, SOC priority individuals and SOC vulnerabilities. This reflects changes introduced nationally in response to the SOC strategy's goal to provide a "single picture of demand." This has been achieved by establishing a national database of SOC threats, which holds information from the NCA, ROCUs, police forces and government agencies that tackle SOC. This database is referred to as the SOC master list and is used to assess which SOC threat is a priority for each agency or force.

The eastern region consists of seven forces: Bedfordshire Police, Cambridgeshire Constabulary, Essex Police, Hertfordshire Constabulary, Kent Police, Norfolk Constabulary and Suffolk Constabulary along with their ROCU and the Eastern Region Special Operations Unit (ERSOU) which has two main functions: ROCU and counter-terrorism policing.

HMICFRS concluded that ERSOU is good at tackling SOC, but Norfolk Constabulary requires improvement in this area. They suggest that ERSOU: has developed its intelligence collection to better understand the regional threat from SOC; uses technology to analyse its performance against OCGs; has the capability to conduct financial investigations but can't

always support forces; seeks to improve its workforce; debriefs its teams about SOC operations to learn and improve; is good at disrupting SOC threats and has supported the establishment of the National Investigation Service. HMICFRS found that Norfolk Constabulary: has strategic documents which are used to set priorities but the contribution of information and intelligence from partner organisations is limited; lead responsible officers are supported in their role; has limited financial investigation capability; has sufficient analytical capability; is working to tackle SOC coming from Western Balkan OCGs; should do more to manage SOC offenders in prison; are focused on identifying those vulnerable to exploitation but some investigators are missing opportunities to safeguard those vulnerable to SOC; is taking a public health approach to some aspects of SOC and is developing diversionary activities in emerging communities vulnerable to SOC

Despite HMICFRS' grading of 'requires improvement' the inspectorate found that the Constabulary was doing good work in the multi-agency child exploitation team, whereby police officers work closely with Norfolk Children's Services to identify children at risk of exploitation, assess their vulnerability and implement a plan to provide support and intervention based on risk. Furthermore, HMICFRS highlighted that Norfolk Constabulary works with Project ADDER, a Home Office-funded programme to reduce drug use and disrupt drug markets.

Recommendations

There are no recommendations made for ERSOU or Norfolk Constabulary.

Areas for Improvement

14 areas for improvement (AFI) were put forward by HMICFRS in their report; two of these were regional AFIs directed at all seven eastern region forces and ERSOU. Furthermore, four of these AFIs were directed specifically towards Norfolk Constabulary. All six AFIs are detailed below using the same numbering contained within the report itself:

Area for improvement 1:

Eastern Region Special Operations Unit (ERSOU) and its constituent forces should improve how the region works to tackle serious and organised crime (SOC).

ERSOU, with constituent forces, should:

- Improve the effectiveness of the lead responsible officer (LRO) role.
- Improve the quality and consistency of 4P plans.
- Improve partnership structures across the region.
- Improve how SOC disruptions are recorded to accurately reflect regional performance.
- Identify and promote good practice.

LROs should prepare 4P plans to manage SOC threats. These plans are important and should support joint working with relevant partner organisations. The content and quality of the operational 4P plans reviewed across the region was inconsistent. HMICFRS found that LROs in some forces were more effective in this area than others.

HMICFRS found that relationships with partner organisations varied between forces. While some forces appeared to have effective arrangements, others struggled to share information and promote joint working, when appropriate.

ERSOU and its constituent forces record SOC disruption data in different ways. Consequently, it is difficult for the region to fully understand how effectively SOC is being tackled.

ERSOU is good at recording and analysing disruption data relating to its own investigations. It should work with constituent forces to help them improve their recording of disruption data.

Area for improvement 2:

Eastern Region Special Operations Unit (ERSOU) and its constituent forces should improve how they procure and deploy technical surveillance equipment.

Technical Surveillance Units (TSUs) provide specialist surveillance equipment to support organised crime investigations. In the eastern region, ERSOU and the constituent forces have retained their own individual TSUs.

Most other regions have collaborated fully on the provision of technical surveillance. This has allowed efficient methods of buying equipment. It also makes sure that equipment is compatible and can be shared across the region.

ERSOU and its constituent forces should consider following the approach of other regional organised crime units, by collaborating in a single regional TSU.

Area for improvement 11:

Norfolk Constabulary should improve how it shares information relating to serious and organised crime (SOC) with partners and frontline staff.

Frontline officers, staff and key partners told HMICFRS that information on SOC threats wasn't routinely shared with them. Staff from one partner agency stated they felt "blindsided" by their lack of knowledge around SOC threats. The constabulary should share information with partners consistently. Currently it is done on a case-by-case basis.

Some partners told HMICFRS that the constabulary tried to introduce a vetting policy for partners participating in local organised crime partnership boards. This has led to some partners disengaging from the board. Consequently, the constabulary has been reluctant to provide detailed updates around SOC to the board. This is affecting how partners are informed about SOC threats.

Area for improvement 12:

The constabulary should make sure that its SOC local profile provides detail of how SOC affects its communities, and this should be reviewed at frequent intervals to help it, and its partner organisations, to better respond to local SOC threats.

At the time of the inspection, Norfolk Constabulary and Suffolk Constabulary had a joint SOC profile. This profile assessed SOC threats in each constabulary area, but not at a local

level. The constabulary informed HMICFRS that it reviewed this over a three-year cycle. This isn't frequent enough to make sure that the constabulary and partner organisations are focused on tackling threats in the right areas or identifying emerging areas of SOC vulnerability.

Area for improvement 13:

The constabulary should improve how it records disruptions on the national database.

In the year ending 31 May 2022, the constabulary recorded 57 disruptions on the national database. This is the third lowest number recorded by a police force in England and Wales. Of these disruptions, 39 were pursue, 10 protect, 6 prevent and 2 prepare.

The constabulary has told HMICFRS that it is maintaining a record of disruptions relating to a high-risk, priority serious and organised crime (SOC) vulnerability it has identified. In accordance with national recording guidelines, these disruptions can't be submitted on the national database. This demonstrates that the constabulary is undertaking activity to disrupt some priority threats.

However, it also suggests that not all disruption activity is being recorded for all threats identified. Several personnel interviewed stated that disruption activity wasn't being fully recorded. The constabulary should raise the awareness of what SOC disruption activity is and how it should be recorded. This will help it to understand its performance in tackling SOC

HMICFRS have detailed that the constabulary should improve partnership working and the management of 4P plans. Improvements in these areas will assist the constabulary in recording all disruption activity.

Area for improvement 14:

The constabulary should improve the quality of 4P plans and how it manages them.

Lead responsible officers should produce a comprehensive 4P plan for each of the serious and organised crime threats they manage. The 4P plans should be regularly reviewed, and activity updated. HMICFRS examined several of these and found that the quality of plans was inconsistent. There was also little contribution from partners in formulating these plans. The constabulary should seek good practice from others and provide relevant training to staff.

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

The inspection looked at how well police forces in the eastern region respond to Serious and Organised Crime (SOC) and includes both regional and individual force findings.

Regional findings:

The Constabulary works closely with the Eastern Region Special Operations Unit (ERSOU) to deliver a range of specialist SOC capabilities. We are pleased to see that ERSOU, which is made up of officers from across the region including Norfolk, has received a 'Good' grading by HMICFRS. This is the highest grading awarded to any Regional Organised Crime Unit in the current round of inspections. Through our well-established regional structures, we will work with ERSOU and the other forces in our region to address the two Areas for Improvement that were directed at ERSOU and all seven eastern region forces:

Area for improvement 1 - Eastern Region Special Operations Unit (ERSOU) and its constituent forces should improve how the region works to tackle serious and organised crime (SOC).

Area for improvement 2 - Eastern Region Special Operations Unit (ERSOU) and its constituent forces should improve how they procure and deploy technical surveillance equipment.

Local findings:

Norfolk Constabulary accepts the 'Requires Improvement' grading and associated Areas for Improvement (AFIs) that the inspectorate put forward for our local response to Serious and Organised crime. We are committed to responding to Serious and Organised Crime within our county and have already undertaken a substantial amount of work around these AFIs.

Area for improvement 11 - Norfolk Constabulary should improve how it shares information relating to serious and organised crime (SOC) with partners and frontline staff.

The Constabulary already provides regular strategic briefings to partners via the Local Organised Crime Partnership Board, chaired by one of our Chief Superintendents, covering the overall SOC threat to the county. Briefings are also regularly provided about specific areas of risk, including drug trafficking, illegal money lending, courier fraud, and organised immigration crime.

We are also initiating a process for sharing information with partners about Organised Crime Groups (OCGs) and our plans for their disruption at the point that new operations are commenced.

Since the inspection activity was undertaken by HMICFRS, we are now talking more about serious and organised crime throughout the Constabulary, so that senior local leads have a more complete picture of the SOC threat in their local area, and our frontline officers know who to look for. We are working with Lead Responsible Officers (the officer responsible and accountable for disrupting and dismantling an OCG using a [4P approach](#)) to ensure that the briefings that our frontline staff receive include up-to-date information on individuals involved in serious and organised criminality.

Area for improvement 12 - The Constabulary should make sure that its SOC Local Profile provides detail of how SOC affects its communities, and this should be reviewed at

frequent intervals to help it, and its partner organisations, to better respond to local SO threats.

We have refreshed our Serious and Organised Crime Local Profile and are in the process of sharing the latest version with our officers, staff, and our partners. This product is more localised than its predecessor, so assists in providing a better understanding of SO related criminality across the county. Within the next six months we will produce an enhanced profile that will continue to provide a more detailed and granular picture of the SO threats across Norfolk. This will increase the ability of the Constabulary and its partners to conduct activity against all the four areas of pursue, prevent, prepare, and protect.

Area for improvement 13 - The Constabulary should improve how it records disruptions on the national database.

At this time, the only disruptions that are recorded nationally are those linked to OCGs that have been scored and mapped in accordance with national processes. OCGs represent a sub-set of SO. It is important to note that during the period under inspection, the force's greatest local SO priority was tackling serious youth violence and the threat posed by county lines, which we know impacts significantly on our local communities. This partnership-based activity, working alongside colleagues from Children's Services, schools, and the voluntary sector, accounted for a significant proportion of our SO disruptions, but as this is not recognised as recordable disruption on the national database, they were not included within the scope of the HMICFRS inspection. This means that the work of our dedicated County Lines Team, which has secured more than 300 years in prison sentences for those responsible for dealing drugs, was not considered as part of this inspection.

We have reviewed our processes for identifying OCG related disruptions and ensuring that they are recorded on the national database. This has already led to increasing numbers being recorded. Our latest disruptions data shows, 12 months on, that we have seen more than twice the recorded OCG disruptions.

Area for improvement 14 - The constabulary should improve the quality of 4P plans and how it manages them.

Since the inspection activity we have introduced a senior Local Policing lead for SO role. We have also continued to develop and support the role of the Lead Responsible Officer (LRO) in line with Home Office Guidance, recognising the crucial part this role has in the delivery of effective 4P plans to disrupt OCGs, Tactical Vulnerabilities and other SO targets, and to ensure that key local partners form part of the approach.

Following the HMICFRS inspection, the force Senior Responsible Officer (SRO) for SO has reviewed all our Pursue, Prepare, Protect and Prevent (4P) plans, and where potential for improvements and gaps were identified, feedback and support is being provided to improve and enhance the effectiveness of these plans.

The introduction of the senior Local Policing lead for SO, and the ongoing peer support processes in place for LROs continues to enhance our approach to the 4Ps.

In response to feedback from HMIC we are also exploring ways to include a wider range of partners in our plans at a much earlier stage.

PCC response to report and any Recommendations/Areas for Improvement

General Comment

My responsibilities include the scrutiny of the policing service provided by Norfolk Constabulary to the communities they serve. The reports prepared by HMICFRS are usually helpful in targeting this scrutiny. However, on this occasion, I have some concerns about

my ability to use this report as a basis for scrutiny given the distinct differences between two HMICFRS reports covering the same subject.

A large proportion of Norfolk's Serious and Organised Crime (SOC) capability is collaborated with Suffolk. This capability was graded by HMICFRS as 'Good' in Suffolk's PEEL report of 2021, but now the same capability is graded by HMICFRS as 'Requires Improvement' in this thematic report of 2023.

I accept that there will be local differences between the Suffolk and Norfolk's response to SOC, and that there could have been a drop in performance between the two reports. However, the thematic report does not recognise that this is a largely collaborated capability; it is not directly cross-referenced with Suffolk's PEEL report; and it does not explain in depth the differences of grades and narratives presented in the two reports.

The latest report thus does not offer the ideal vehicle against which to hold my Chief Constable to account about specifics.

Turning to the four Areas for Improvement (AFI) given in the thematic report:

AFI 11 - The Constabulary should improve how it shares information relating to SOC with partners and frontline staff:

The report comments on the need for better information sharing without considering and offering guidance about the risks inherent in inappropriate over-sharing, which would quickly be highlighted by other agencies.

The report also omits mention that mature information sharing arrangements exist through vehicles such as Operations BOKKEN, DERAIL, EAGLE and Project ADDER. HMICFRS noted the value of Operation EAGLE, a joint-force partnership forum, in Suffolk's PEEL report but did not carry these comments forward to this report.

Norfolk's briefing and tasking processes mirror those in place in Suffolk, delivered by the collaborated Joint Intelligence Directorate. When Suffolk were inspected, they received positive recognition for their tasking processes and how these identify and target SOC subjects. However, HMICFRS now states that the same arrangements by the same unit now require improvement.

AFI 12: The Constabulary should make sure that its SOCLocal Profile provides detail of how SOC affects its communities, and this should be reviewed at frequent intervals to help it, and its partner organisations, to better respond to local SOC threats:

Norfolk and Suffolk issued a joint SOC Profile in 2021 as HMICFRS recorded in Suffolk's PEEL report. I note HMICFRS's view in the thematic report that this is not sufficiently local and I am aware that Norfolk Constabulary is addressing the point.

Neither Home Office nor College of Policing guidance, nor this thematic report, state how often a profile should be reviewed. It would be helpful if HMICFRS, having raised the observation, would offer guidance about how often such profiles should be reviewed as it is difficult for forces to keep up without such clarity.

AFI 13: Norfolk should improve how it records disruptions on the national database:

The national database only allows records of disruptions against Organised Crime Groups (OCG) that have been scored and mapped in accordance with national guidelines. Norfolk's SOC priority during the period of the thematic report was the tackling of serious youth violence and the threat posed by County Lines. The partnership-based work of the former accounted for a significant proportion of SOC disruptions but were not recordable on the national database under current guidelines. Meanwhile, the highly successful efforts of Norfolk's County Lines Team were not considered as part of this inspection.

I am aware that Norfolk Constabulary has reviewed processes for identifying OCG related disruptions and ensuring that they are recorded on the national database. This is resulting in increasing numbers being recorded notwithstanding national guidelines.

AFI 14 - Norfolk should improve the quality of 4P (Pursue, Prevent, Protect, Prepare) plans:

I note that the Constabulary has appointed a senior lead and are reviewing all plans to enhance and improve the quality in this matter.

Conclusion

As always, I seek to use HMICFRS inspection reports to assist in my role of helping the Constabulary to deliver the best possible service and holding the Chief Constable to account for the policing service provided. I hope I have explained how this report does not really offer the clarity of advice to facilitate this scrutiny function.

Nevertheless, the differences between Suffolk's PEEL report and this report will be reviewed by the Norfolk and Suffolk Collaboration Board at which I and PCC Suffolk, together with our respective Chief Constables and supporting senior staff, address issues arising in our shared space. I have already reviewed all four AFIs with my Chief Constable who has, as is his practice, accepted the report as an opportunity for service improvement.

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- ✓ Response forwarded to HMICFRS Section 55 Responses and submitted on HMICFRS Portal
- ✓ Response forwarded to Chief Constable
- ✓ Response forwarded to Police and Crime Panel
- ✓ Response published on the OPCCN website