



## **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:**

An inspection into activism and impartiality in policing

### **Published on:**

10 September 2024

### **Publication Types:**

Equality and diversity, Ethics and accountability, Protest, Thematic inspection

### **Police Forces:**

All local forces in England and Wales

### **Link to Report:**

[An inspection into activism and impartiality in policing - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services \(justiceinspectorates.gov.uk\)](https://www.justiceinspectorates.gov.uk)

### **Section 55 Response Deadline:**

5 November 2024

### **Key Findings**

In September 2023, the then Home Secretary commissioned HMICFRS to inspect police involvement in politically contested matters including examining whether the police allow politics or activism to unduly influence them. The inspectorate examined several things: the police's policies, processes and decision-making, how officers are trained, the police's work with external advisory groups, how police deal with non-crime hate incidents, the police's communication with the public, and whether there are any systemic problems that interfere with police impartiality.

HMICFRS found three systemic problems. First, there is a near-total absence of any definition, guidance or judicial consideration of impartiality insofar as it relates to policing. Second, legal application of the Equality Act 2010 is now too complicated. Third, the

legislation doesn't clearly define the boundary between police operational independence and appropriate external influence or accountability.

Most chief officers told the inspectorate that they experience what they believe to be improper pressure or interference from significant political figures. Chief constables and police and crime commissioners don't always understand the delineation of their roles and responsibilities. Chief constables need more guidance to help them maintain operational independence.

All police officers in England and Wales swear allegiance to the Crown through the oath that they take on joining the police service. This includes swearing that they will act with impartiality. Most police officers and staff believe they do act with impartiality. They understood impartiality in relation to party politics but there isn't enough guidance for police officers and staff navigating complex and politicised modern issues. There is no national guidance that describes precisely what the impartiality duty means, or what it does and doesn't cover. Although there is training for chief officers which includes a greater focus on impartiality, it is still not covered well enough in the training given to all police officers and staff.

The legal interpretation of the Equality Act 2010 is complicated and continues to evolve. It is a lengthy piece of legislation which brought together many different pieces of non-discrimination legislation that preceded it by many decades. Under the 2010 Act, police forces have a duty not to discriminate against members of the public or their own personnel. Police sometimes make decisions relating to the Equality Act 2010 that attract criticism. This is particularly the case when they interpret sex, gender and gender reassignment in relation to both the public and their workforce. Legislation and national guidance aren't clear enough. Policing urgently needs greater clarity about how the 2010 Act applies in real-world policing contexts if it is to improve the trust and confidence of the public and support its workforce.

It is important that police engage with communities to serve them effectively. But engagement at some public events may make the police appear less impartial, and the actions of individual officers and staff can undermine the best-laid operational plans. Sometimes, officers and staff get things wrong and the resulting images or footage, propelled by modern media formats, can be extremely damaging.

It isn't always easy to assess whether the police are being impartial. It is even harder to judge how effectively forces maintain the appearance of impartiality. There are differing perceptions of what impartiality is across various groups and communities.

The absence of national guidance on police participation in community events increases the risk of the police appearing less than impartial.

The Policing Protocol Order 2011 set out new governance arrangements for policing, including how the component parts of policing governance operate in relation to each other. These include: the Home Secretary; police and crime commissioners (PCCs); mayors; chief constables; police and crime panels; and the London Assembly Police and Crime Committee. While the 2011 Protocol didn't define police operational independence, it did

recognise that Parliament and Government didn't want police officers to be open to improper political interference.

The role of PCCs has made policing more political. In 2015, the Committee on Standards in Public Life found that policing was experiencing political interference and stated there was confusion among the public, chief constables and PCCs. It also stated that the absence of a definition of operational independence was problematic.

On 3 July 2023, the Policing Protocol Order 2023 came into force. The 2023 Protocol includes reserved powers that allow the Home Secretary to intervene and direct all parties within the governance arrangements, in exceptional circumstances. This is to prevent or mitigate risk to the public or national security. But that only applies if the Home Secretary is satisfied, on the advice of the Chief Inspector of Constabulary, that not intervening would result in a police force failing, or national security being compromised.

The relationship between PCCs and chief constables involves a delicate balance. Chief constables and PCCs don't always understand the delineation of their roles and responsibilities. The Police Reform and Social Responsibility Act 2011 states that a chief constable must have due regard to the police and crime plan issued by the PCC or mayoral equivalent. It doesn't necessarily mean they must implement it. However, some PCCs hold the chief constable to account for implementing their police and crime plan rather than for the performance of the force.

Senior officers and staff have varying experiences of working with PCCs. Some are clear that local politicians aren't inappropriately influencing policing matters in their force. However, others recognised attempts to inappropriately influence policing, albeit they had resisted such attempts.

Some local police commanders, officers and staff who regularly receive operational tasks from their PCC said the level of intrusion by the PCC affects their ability to carry out their role and to remain impartial in policing their areas.

MPs and councillors sometimes try to influence police activity. These politicians are entitled to ask what officers and staff intend to do because they represent their communities and society in general. In all but the most extreme and unusual of circumstances, MPs and councillors should be very mindful not to publicly criticise, interfere with or otherwise try to influence any decisions in advance of the police implementing them.

Some officers and staff felt that political interference can result in a prioritised policing response such as the prioritisation of otherwise low-priority investigations and trying to achieve a quick resolution through political influence.

Politicians should be cautious when becoming involved in operational decisions. After the event, their potential influence could become public knowledge and affect judicial proceedings. Political influence can have long-lasting and far-reaching consequences.

All 43 Home Office forces have policies or guidance documents about communicating with the public, including by using social media. Most officers and staff had a good

understanding of these policies. However, these communications policies don't give guidance to the workforce on communicating about contested issues.

Police communications and stories in the media about the police can quickly go viral and potentially have a negative effect on public perception of the police. Force communications policies need to give clear directions to officers and staff about communicating with the public in relation to contested and political issues and social causes. However, communication using visible representations risks misinterpretation. Policies and force directions about whether the workforce can wear or display such visible representations were inconsistent and sometimes unclear.

The media has an important role in communicating police messages to the public and in helping the public to hold the police to account. But forces can quickly lose control of the narrative when the media and social media take an interest in an incident.

Other external influences can affect public perception of police effectiveness and impartiality. Many chief constables stated that they have started to communicate less on social media. They cited two reasons for this. The first was the risk of other social media users misrepresenting or distorting police communications to serve their own agenda. The second was automated bots.

There is consistent evidence that forces comply with the requirements of the Equality Act 2010 when developing policies and processes. Completing equality impact assessments helps forces comply with this legislation. There isn't enough training in some forces for those completing equality impact assessments, and forces don't always complete them consistently or thoroughly enough. Forces don't systematically review all policies and processes relating to the Equality Act 2010. They should keep all policies up to date so that they reflect changes in the law and allow officers and staff to make decisions based on the correct information.

Forces are trying to navigate this complex legal framework. They need to balance the rights of individuals, some who hold diametrically opposite views, and still find a way through the complex area of equality legislation. This applies to their own policies as well as to their work protecting the public.

Many of the topics covered by the Equality Act 2010 are the subject of emerging case law, which police forces and the College of Policing need to interpret and respond to quickly.

Working with external groups or organisations, including those which hold views that others could find challenging, is important. Forces continually review the appropriateness of relationships with external training providers and advisors and assess their credibility.

Forces make sure all officers receive equality training when they first join, but refresher training on equality is inconsistent and some forces don't give it. Equality learning and development for supervisors is also inconsistent.

Guidance on the role of external advisory groups is outdated and doesn't reflect the increase in the number and use of such groups. Police forces need updated guidance to help them use external advisory groups more consistently and effectively. Most forces have

a police officer lead for external advisory groups at a strategic level. But it is often unclear how forces bring together governance and oversight of the separate groups. The terms of reference for advisory groups are often unclear. This means that some forces are unclear about how they could or should use their external advisory groups.

There was little guidance to forces about the recruitment and selection of external advisory group members. As a result, this process varies across forces. Some force recruitment processes for external advisory group members require vetting. Other forces take a less intrusive approach as they have found that vetting can be a barrier to recruiting members.

External advisory groups aren't always representative of local communities. Forces often struggle to attract people with a variety of lived experience to their advisory groups.

External advisory groups aren't always independent. Most forces don't review the membership of external advisory groups, and some members have been in post for a long time.

Differences between the Non-Crime Hate Incidents (NCHI): Code of Practice on the Recording and Retention of Personal Data NCHI Code of Practice and the Equality Act 2010 can cause confusion. The NCHI Code of Practice contains "particular" characteristics that are included in hate crime legislation. The Equality Act 2010 contains different "protected" characteristics.

Some forces don't effectively assess reported incidents, resulting in incorrect recording and inefficient deployment of police resources. The initial assessment is a key stage in the response to reported incidents. Call takers may not be best suited to make this complicated assessment. Forces should make sure that only personnel with the relevant knowledge, and sufficient capacity, to make informed decisions assess reported incidents and determine the appropriate response.

Force review processes for NCHIs and hate crimes don't always provide effective scrutiny. Ineffective review processes in some forces meant that they routinely deployed resources, and allocated incidents for investigation, unnecessarily.

Staff network activity, such as offering advice on, or communicating about, government policy, could lead to a perception that they aren't impartial. Staff networks need clearer guidance to mitigate the risk of them appearing to be political. National police networks have an important role in policing, but their role and terms of reference need to be clear and consistent.

## **Recommendations**

22 recommendations are made within the report, nine of which are directed at Chief Constables:

### **Recommendation 9**

Within six months of the College of Policing updating its engagement and communication authorised professional practice, forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.

### **Recommendation 10**

By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief constables should regularly review these policies to respond to new causes that arise. The National Police Chiefs' Council should support chief constables in achieving a consistent approach.

### **Recommendation 12**

By 31 July 2025, chief constables should make sure that those personnel responsible for completing equality impact assessments are appropriately trained to do so. Chief constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.

### **Recommendation 13**

By 31 March 2025, all chief constables should audit their policies that include or relate to the Equality Act 2010. They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.

### **Recommendation 16**

By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.

### **Recommendation 17**

By 31 March 2025, forces should make sure their recording processes for hate-related incidents allow them to analyse data relating to hate crimes and non-crime hate incidents.

### **Recommendation 18**

By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.

### **Recommendation 20**

By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from 'Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data', the force should record the rationale for this.

### **Recommendation 22**

By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.

### **Areas For Improvement**

There are no areas for improvement made.

## Chief Constable response to report and any Recommendations/Areas For Improvement

This report entitled "*An inspection into activism and impartiality in policing*" examined some significant and complex issues relating to police involvement in politicised or contested matters.

It is of great importance that the police service acts with impartiality and that it remains independent when delivering services to the public. I am pleased that the report recognises this and that it also recognises that the impartiality and independence of the police service is vital for building and maintaining the trust of our communities.

The inspectorate is right to point out many of the observations that are included within the report, including the need for greater clarity on how the Equality Act 2010 applies in real-world policing contexts, with the need for clearer national guidance and legislation.

The report makes 22 recommendations which HMICFRS state are designed to provide clarity that will enable police forces to be, and to be seen to be impartial, including nine recommendations which have been specifically directed to all police forces and Chief Constables across England and Wales.

The Constabulary is carefully considering these recommendations. We have completed an early review of our current position against each of these recommendations to determine the actions that we might need to take to help us to achieve the standards outlined by HMICFRS within the timeframes that they have specified, as set out below:

### Recommendation 9

**Within six months of the College of Policing updating its Engagement and Communications Authorised Professional Practice, forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.**

The report includes a recommendation (Recommendation 8) that by 31 July 2025, the College of Policing should update its Engagement and Communications Authorised Professional Practice (APP) to give more up-to-date information about communicating using social media platforms, and that the APP should also include guidance about how to communicate about politicised and contested matters.

When the updated APP is published, the Constabulary will review it against our local Communications and Engagement policy, and our Digital Engagement and Social Media policy, and will update these policies where required.

### Recommendation 10

**By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief constables should regularly review these policies to respond to new causes that arise.**

## **The National Police Chiefs' Council should support chief constables in achieving a consistent approach.**

The wearing and displaying of visible representations is covered by the Constabulary's Uniform Standards Policy. The policy is currently owned by the Professional Standards Department, but this is under review, with a proposed transfer of ownership to the People Directorate.

In response to this HMI-CFRS recommendation the policy will be reviewed and will be updated as required, in consultation with our Staff Support Networks, UNISON, and the Norfolk Police Federation. Any changes will be aligned to the Constabulary's cultural objectives and our Equality, Diversity, and Inclusion Strategy.

The Constabulary would welcome the support of the National Police Chief's Council in achieving a consistent approach across all police forces, as outlined by HMI-CFRS within their recommendation.

### **Recommendation 12**

**By 31 July 2025, chief constables should make sure that those personnel responsible for completing equality impact assessments are appropriately trained to do so. Chief Constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.**

We have recently updated our Equality Impact Assessments Policy (September 2024) and have trained Project Managers and our Human Resources teams on how Equality Impact Assessments (EIAs) should be completed.

The senior officer with responsibility for each Force Policy Document (the SRO) is responsible for the content of the corresponding EIA.

This recommendation will be incorporated into our force Equality, Diversity, and Inclusion action plan to ensure effective governance. As an initial action, a communication will be sent to all SROs to remind them about their responsibilities and ask whether they need any additional training or guidance to support them in fulfilling their responsibilities. Further training/inputs will be scheduled depending on responses.

The Constabulary is concerned by the lack of national training for senior officers on EIA, with existing training mostly being directed at practitioners.

### **Recommendation 13**

**By 31 March 2025, all chief constables should audit their policies that include or relate to the Equality Act 2010. They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.**

The Constabulary has effective processes in place for regularly reviewing and updating policies, with clear governance arrangements.



The Constabulary has a Central Policy Unit (CPU) which maintains a well-established policy review process, which is determined by the policy's risk score. A risk score is assigned for each policy through the application of a risk matrix which is consistently applied by the CPU in conjunction with the policy owner. As a result, policies are required to be reviewed every two, three, or four years, depending on the score.

All policies are included within a central library which is maintained by the CPU. Reviews are initiated six months before the review deadline to allow sufficient time for appropriate review, consultation, ratification, and publication.

A dedicated Policy Manager monitors changes in terms of Employment Law and legislative updates including the Equality Act 2010 and makes changes accordingly.

All policies must be accompanied by an Equality Impact Assessment (EIA) which the review and consultation process helps to inform.

Consultation on a new or reviewed policy includes department leads from specialist areas such as People Directorate and Legal Services. Our Independent Advisory Group (IAG) are included consultees.

Thereafter the policy is ratified at a Joint Negotiating Consultative Committee (JNCC) meeting. The JNCC also includes representation from Staff Associations and is chaired by the Deputy Chief Constable on behalf of the Chief Constable.

An accessible policy template is used for all policies and includes links to the Equality Act 2010 via the Government website. Where the Government Security Classification allows, a policy will be published on the Constabulary's public facing website. All policies are published internally in a library on the Constabulary's intranet site which is a 'front page feature' of the site to enable easy access for users.

### **Recommendation 16**

**By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.**

The Constabulary has adopted the Non-Crime Hate Incidents Code of Practice and the revised Non-Crime Hate Incident Approved Professional Practice and is currently undertaking a policy commissioning process to ratify the policy document and insert it into our existing Hate Crime Force Policy Document.

Information, guidance, and learning material for non-crime hate incidents that has been received from the College of Policing has been disseminated to relevant members of our workforce, which has included providing easy reference guides and material to support officers and staff in their understanding of recording requirements.

A face-to-face learning package has been created which will be delivered to frontline police officers as part of their regular continuous professional development training days that are incorporated into their shift pattern. This programme will run until March 2025.

The Constabulary monitors compliance with the new approach to recording non-crime hate incidents through its Crime and Data Quality Board, which is chaired by the Assistant Chief Constable for Local Policing. This Board receives audit information from the Force Crime Registrar on this incident type. This allows for monitoring of compliance and the ability to task further communication or support options to staff if required.

The Force Crime Data Integrity Quality Assurance Team (CDIQAT) audits non-crime hate incidents to assess compliance and takes corrective action where it finds non-compliance. This approach also enables assessment of workforce understanding and practice, allowing for further opportunities to understand where more training and education is required.

### **Recommendation 17**

**By 31 March 2025, forces should make sure their recording processes for hate-related incidents allow them to analyse data relating to hate crimes and non-crime hate incidents.**

For a number of years, the Constabulary's Strategic Business and Operational Services (SBOS) department has produced analysis in respect of hate crimes and non-crime hate incidents. This analytical report is produced every six months and is used by the Community Safety Equality, Diversity & Inclusion Team, and by Local Policing District Commanders and their teams to consider both strategic and tactical approaches for responding to hate-related incidents.

### **Recommendation 18**

**By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.**

The Constabulary operates a THRIVE decision making process within our Control Room environment, enabling us to thoroughly assess and review calls for service including those relating to hate incidents. This includes calls for service via digital reporting channels. The Constabulary manages its response to incidents via the Control Room STORM system and the ATHENA investigation recording system.

There are established supervisory approaches that ensures effective and efficient assessment and reviews of hate-related incidents. This is supported by relevant force policies and Standard Operating Procedures to guide staff and supervisors in decision making.

Processing and quality assurance work is undertaken by the ATHENA Investigation Management Unit (IMU) function as it processes new entries onto ATHENA. Additionally, the Force Crime Registrar audits, and the work of the CDIQAT as detailed above under Recommendation 16, provides assurance opportunities.

The Constabulary also has subject matter experts who provide support to front line staff in their decision making to ensure correct application of the law and policy.

The Constabulary's Equality, Diversity & Inclusion Team undertakes a daily review of relevant hate-related incidents, flagging incidents of concern and disseminating

information to local senior leaders for inclusion in district and force level Daily Management Meetings.

### **Recommendation 20**

**By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from 'Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data', the force should record the rationale for this.**

The Constabulary has adopted the Non-Crime Hate Incidents Code of Practice and the revised Non-Crime Hate Incident Approved Professional Practice and is currently undertaking a policy commissioning process to ratify the policy document and insert it into our existing Hate Crime Force Policy Document.

### **Recommendation 22**

**By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.**

The Constabulary allocates a small budget for Staff Support Networks each financial year. This budget is managed by the Deputy Chief Constable. Our Staff Support Networks are aware that this budget exists and they apply for funds from it by making a request via the Deputy Chief Constable's Staff Officer or the Equality, Diversity & Inclusion Team Manager. All requests are dealt with fairly, for example, each network is funded two places at their relevant annual conference, but exceptional circumstances will also be considered. The Constabulary has a Staff Support Network Groups Force Policy Document which includes a section on the resources that are available to Staff Support Network groups.

This recommendation will be considered by the Joint Equalities Board when it next meets, and if it is decided that any changes need to be made to our current process, these changes will be implemented, and the Staff Support Network Groups Force Policy Document will be updated in line with this.

## PCC response to report and any Recommendations/Areas For Improvement

On Tuesday 10<sup>th</sup> September 2024, the HMICFRS published their report, "An inspection into activism and impartiality in policing". This report considers a wide range of matters including systemic, legislative, operational and political and sets out a number of recommendations. The report notes the complexities and challenges of policing in today's social climate, and I welcome that context in which the report's findings are presented.

The report considers if and how policing is politicised, yet the very existence of this report demonstrates the political interest in policing and how politicians can seek to use the wider system to their own ends. It is notable that this report considering activism and impartiality, was commissioned by the then Home Secretary during the damaging so-called "culture wars", and that it constituted "one of the most challenging inspections" to have been carried out. Having read the report in full, I am as yet unconvinced by some of its findings, not least because it lacks methodological rigour and many stakeholders identified the "political nature of the commission". This means that the evidence drawn upon in the report can only be partial and incomplete.

I have some concerns regarding the methodology used in this inspection.

1. The report notes that the terms "contested" and "politicised" were not defined in the commissioning letter. Rather than seek clarification, HMICFRS appears to have defined the two. I note that the definition of "politicised" includes almost every conceivable part of our society as it covers the subject "of political debate, commentary or policy." Having such an open definition does not support the methodology which is narrow in focus – and vice versa.
2. Only X/Twitter social media posts by police services were considered. Given the well-established differences in use between X/Twitter and other social media, not least the echo-chamber effect of the X/Twitter algorithm, it is concerning that the social media which has the most meaningful engagement with local communities (Facebook via community pages) was not directly included.
3. The self-selecting nature of the stakeholders involved means that the feedback cannot be considered as representative. I note there is no mention of population statistical representation in the methodology. This is worrying given the material under consideration.
4. The means by which survey respondents were identified is not detailed. There is no indication as to whether respondents were representative of the population or a self-selecting sample. There is therefore no quality assurance of the data provided and the conclusions drawn from it.
5. No policing data was used to measure impartiality. Given the need for policing to be by consent, police impartiality (or lack thereof) should be in evidence in data associated with the constabularies' work. No police data were identified or attempted to be used as proxies or indicators of partial/ impartial policing by outcome measure.

It is important that we recognise that how our society is policed, along with education, health care, defence and similarly structural matters are subject to political decisions.

Further, it is critical to recognise that while police officers are servants of the Crown and not employees, the people working in the Constabulary are of our communities – all of them. It is my view that the police service needs to be structurally and operationally impartial, while recognising, as the report does, that the constabularies must police people with highly divergent views, often in the same place and time, often under constraints or taking into account decisions which are political in nature.

Notwithstanding my concerns regarding the methodology employed, I note the recommendations made in the report with respect to Chief Constables and the Association of Police and Crime Commissioners. I welcome the observations that are made in the report relating to the shortfalls in some PSED guidance given the full complement of protected characteristics.

The report states that clarity is needed on specific factors in order to police effectively e.g. “biological sex, regardless of any Gender Recognition Certificate, as the determinant factor in police searching policy.” By ignoring people’s inherent needs and dignity, such an approach could be damaging.

I am disappointed that the report seeks clarity on policing with respect to protected characteristics by simplistically seeking clarity only on protected characteristics and not, for example, on how people should be treated. An alternative or additional approach may be to recognise the inherent complexities of our species and identify the essential requirements which are shared by all of us including, but not limited to, dignity, respect and privacy. These are all factors that the overwhelming majority of people value and it is my view that the guidance should focus on providing these consistently for people in the policing system regardless of the differences between individual people – whether they are serving as part of the constabulary or being policed by it.

The report makes a series of observations regarding the function of Police and Crime Commissioners, with reference to documents which are now very aged, and simply states without evidence that PCCs have made policing more political. Since my election in May 2024 I, as for all other PCCs whether newly elected or returning, have received advice from the Association of Police and Crime Commissioners on the operational dividing line between PCCs and Chief Constables. It is disappointing therefore that the HMICFRS relies in part on such old material.

However, through discussions with current and former PCCs and Chief Constables, I recognise some of the report’s observations regarding difference in approach between PCCs with respect to operational interference. While I believe it is relevant and helpful to seek clarification from the constabulary in discharging my duties as victim’s commissioner for example, I agree that there should be a clear delineation between PCC and Chief Constable. I therefore welcome Recommendation 7 which seeks guidance with respect to operational independence. I would also welcome further work from the Association of Police and Crime Commissioners in the development of assurance guidance for PCCs to give the public more confidence in the efficacy of the role.

Finally, with respect to external advisory groups, the report notes the differences in approach between police services in recruiting and using these advisory groups. Based on discussions with Norfolk Constabulary officers and staff, I am reassured of the useful nature of the Independent Advisory Group (IAG) run by my office. However, I read with interest the report's comments relating to vetting and the opportunities to bring more different voices and experiences into the IAG. I am grateful to the volunteers who give up their time to contribute to this important function and I look forward to forthcoming advice and guidance on how these IAGs may be further improved.

#### **For Office Use Only:**

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