



## WEST YORKSHIRE POLICE AND CRIME PANEL

11<sup>th</sup> September 2020

### HMICFRS PEEL Assessments

#### 1.0 Background

- 1.1 The last West Yorkshire Police and Crime Panel HMICFRS PEEL update report was in 2018. This report addresses developments in this area since that time
- 1.2 HMICFRS: 'Her Majesty's Inspectorate of Constabulary, Fire and Rescue' is an independent body reporting to the UK Parliament, often working in conjunction with other inspectorates such as HM Inspectorate of Prisons or HM Crown Prosecution Service Inspectorate. Whilst HMICFRS undertakes and reports on a number of different themes and topics throughout the year, the main annual assessment of the police service is carried out under PEEL. PEEL being Police Effectiveness, Efficiency and Legitimacy.
- 1.3 Prior to 2018 HMICFRS inspected each force on separate occasions throughout the year to look specifically and independently at the 3 'pillars' of inspection Effectiveness, Efficiency and Legitimacy. From 2018 HMICFRS undertook to inspect forces under an "Integrated PEEL Assessment" (IPA) whereby the 3 pillars would be inspected at once, during one inspection period. This brought efficiencies in their inspection regime and the approach also recognised that forces have interdependencies between the differing pillars which are not so simple as to assess independently.
- 1.4 The latest PEEL Inspection of West Yorkshire Police, the only one to have taken place since the last Police and Crime Panel update, took place in 2019 and was such an 'Integrated PEEL Assessment'. The HMICFRS 2018 Inspection round over ran into 2019 and so is often referred to as 'PEEL 2018/19'. West Yorkshire Police received their formal PEEL 2018/19 report in February 2020.
- 1.5 PEEL 2018/19 was an inspection framework of 10 core questions (covering key areas of policing business) with 'diagnostic' questions and 'sub-diagnostic' questions that afforded HMICFRS the ability to drill down into the details of the core question. 9 of the core questions were each given a grading under the framework of Outstanding, Good, Requires Improvement and Inadequate. Core questions would fall under one of the 3 distinct 'pillars' which afforded HMICFRS the ability to provide forces with not only 9 individual gradings but a 'pillar grading' that best reflected the force performance under the respective pillars of Effectiveness, Efficiency and Legitimacy.
- 1.6 Moving forward, HMICFRS are currently undertaking a second round of formal consultation regarding further revisions to their approach to inspecting forces. The likely impending changes will be briefed later in this report.

## 2.0 West Yorkshire Police PEEL Assessments

2.1 West Yorkshire Police progressed from being graded as GOOD throughout each pillar of the PEEL Assessments in 2017 to achieving Outstanding in the Efficiency pillar of Integrated PEEL Inspection. A large part of the evidence used to underpin the overall grading of Outstanding in the Efficiency pillar is the forces approach to the Force Management Statement – a public document in which the Chief Constable describes the state of their police force fundamentally addressing:

- the demand the force expects to face in the next four years;
- how the force will change and improve its workforce and other assets to cope with that demand;
- how the force will improve its efficiency to make sure the gap between future demand and future capability is as small as it can reasonably be; and
- the money the force expects to have to do all this.

2.2 In summary of the 2018/19 Integrated PEEL assessment, Her Majesty's Inspector Mr Phil Gormley, QPM wrote:

"I congratulate West Yorkshire Police on its excellent performance in keeping people safe and reducing crime

The force is good at preventing crime and anti-social behaviour. It works effectively with other agencies to identify and protect vulnerable people

The force is outstanding at planning for the future. I am impressed with its understanding of changing demand and how it links this to its financial planning and workforce development. Its leaders are ambitious and want to be at the forefront of innovative practice.

It treats the public and its workforce fairly. And it continues to uphold an ethical culture and promote the standards of professional behaviour it expects.

I am also particularly pleased with the force's performance in recording crime. It has substantially improved its crime recording accuracy since our last inspection.

There remain some areas for improvement. It needs to improve the quality and supervision of criminal investigations, particularly those involving very vulnerable victims. The force also needs to increase its capability and capacity to effectively and proactively counter potential corruption within its workforce.

Overall, I commend West Yorkshire Police for sustaining its positive performance over the past year. I am confident that it is well equipped for this to continue."

2.3 A summary comparison of the 2017 and 2018/19 PEEL assessments can be found below

NOTE: Under Integrated PEEL, two Efficiency questions were combined into one.

Strand	Question	Pillar 2017	Grading 2017	Pillar 2018/19	Grading 2018/19
Effectiveness	How effective is the force at preventing crime, tackling anti-social behaviour and keeping people safe?	Good	Good	Good	Good
	How effective is the force at investigating crime and reducing re-offending?		Requires improvement		Requires improvement
	How effective is the force at protecting those who are vulnerable from harm, and supporting victims?		Good		Good
	How effective is the force at tackling serious and organised crime?		Good		Good
	How effective are the force's specialist capabilities?		Ungraded		Ungraded
Efficiency	How well does the force understand demand?	Good	Good	Outstanding	Good (Question's combined)
	How well does the force use its resources?		Good		
	How well is the force planning for demand in the future?		Good		Outstanding
Legitimacy	To what extent does the force treat all of the people it serves with fairness and respect?	Good	Good	Good	Good
	How well does the force ensure that its workforce behaves ethically and lawfully?		Good		Requires improvement
	To what extent does the force treat its workforce with fairness and respect?		Good		Good

### 3.0 West Yorkshire Police progression

- 3.1 West Yorkshire Police aspire to be the best we can in all areas of policing and as such have governance and oversight of our journey of improvement against HMICFRS gradings.
- 3.2 An HMICFRS Improvement Board led by the Deputy Chief Constable, supported by an HMICFRS Operational Group led by the Director of Corporate Services are addressing identified Causes of Concern, Recommendations and Areas for Improvement identified by HMICFRS during previous PEEL Inspections whilst also making progress against identified internal audits, preparing to be the best we can for future inspections.
- 3.3 Appendix A provides an overview of the progress that the force has made against identified Causes of Concern, Recommendations and Areas for Improvement identified by HMICFRS since previous PEEL Inspections.
- 3.4 Given the positive feedback the Force has had on its Force Management Statement, West Yorkshire Police have worked closely with the NPCC and HMICFRS in developing the approach to demand predictions and have also been actively engaged in developing the guidance for the publication of FMS3. The Force has presented at NPCC/HMICFRS workshops and is approached by other Forces to share our FMS and approach to predicting demand.

- 3.5 West Yorkshire Police continue to maintain regular professional dialogue and consultation with HMICFRS to continue to develop ourselves as best we can to provide the best possible services to communities of West Yorkshire.

#### 4.0 PCC Oversight

- 4.1 The OPCC pays close attention to HMICFRS inspection reports and works closely with the liaison officers to ensure that both the OPCC and West Yorkshire Police are using the information to improve the service provided to the public. This oversight is provided in various ways:
- 4.2 **Inspection debriefs** – Each time an inspection is carried out by HMICFRS, a public report is produced containing the findings, however the reports are generally not released until months later as HMICFRS need to ensure that their findings are moderated across other police forces. To ensure that this delay does not hinder progress “hot debriefs” are held by HMICFRS with the PCC, Chief Constable and relevant colleagues. This is the first opportunity to listen to what HMICFRS has found during the inspection allowing the information to be acted on straight away. It also allows the PCC and Chief Constable the opportunity to ask questions of the HMIs to aid fuller understanding of the findings and have initial conversations around next steps and formulate plans where appropriate.
- 4.3 **Review of reports** – Once the report for an inspection has been released, the OPCC will read through it and take note of examples of good practice as well as areas for improvement. This will then be summarised and circulated to the relevant staff within the OPCC for their awareness or action if required. The research team will then meet with West Yorkshire Police HMICFRS liaison officers to discuss the report and what action the police are taking as a result, a summary of which can be found at Appendix A. The PCC will also formally respond to the Home Secretary (as required) publishing the response on the website.
- 4.4 **Meetings** – The OPCC holds various meetings at different levels with West Yorkshire Police to provide oversight of their activity in relation to HMICFRS assessments. The research team have regular meetings with the HMICFRS liaison officers to monitor the progress against areas for improvement in each HMICFRS report. This is also an opportunity to discuss upcoming inspections and offer support to West Yorkshire Police. In addition to this, the PCC will also meet with the Chief Constable to discuss the findings from reports and the ongoing activity to ensure that West Yorkshire Police are doing what is needed to improve and also set against the context of the Police and Crime Plan..

#### 5.0 PEEL 2020/21 consultation

- 5.1 HMICFRS commenced consultation with regard to a further revised approach under PEEL 2020. Due to the COVID pandemic, consultation was initially extended indefinitely but has been refreshed and ended on 31st July 2020. HMICFRS PEEL Inspection activity is likely to recommence in 2021 and as such the revised consultation is now titled PEEL 2020/21.
- 5.2 It is intended that the current Integrated PEEL Assessment approach will be revised approach to evolve into an assessment framework whereby, the 3 pillars of Effectiveness, Efficiency and Legitimacy will be replaced by an assessment framework comprising of 3 clusters, with 11 core areas (or questions) :

- An operational assessment – how well services are provided;
- An organisational assessment – how well the police force is run; and
- A service user assessment – the outcome from the perspective of those receiving the services.

5.3 The combined elements of Effectiveness, Efficiency and Legitimacy will be assessed within each core area.

The purpose of this is to:

- Reflect current priorities, risks and standards;
- Enable an assessment of effectiveness, efficiency and legitimacy in a specific area of policing; and
- Increase the focus, where feasible, on outcomes and what matters to the public (better balance of outcomes versus process).

5.4 Furthermore, there is consideration of an additional, middle, tier of grading of Fair which will sit between Good and Requires Improvement. The inspection process will also effectively be one of continuous assessment to support the HMICFRS principal aims of contributing to genuine improvements in policing and highlighting problems at an early stage to reduce the risk of failures.

5.5 West Yorkshire Police have participated in the consultation phase and it is noted that revised consultation includes a proposal by HMICFRS to better appreciate the contextual factors that can have an effect on force performance, something which West Yorkshire Police suggested during the consultation phase. HMICFRS define that context as: “The group of factors which affect a force’s performance, over which it has no (or very indirect) control.” These factors can include: the force’s income, socio-economic status and other demographics of the forces population; the rurality and transport network of the force area; as well as, the performance of other local services, such as schools and children’s services, hospitals and mental health services.

5.6 West Yorkshire are continuing to work closely with HMICFRS to be fully prepared for the proposed inspection regime. It is pleasing to note that the service user assessment will include Crime Data Integrity as part of that assessment. Previously a national thematic inspection, West Yorkshire were graded as Outstanding for their Crime Data Integrity inspection 2018, the findings being published in May 2019.

## Appendix A:

An overview of the progress that the force has made against identified Causes of Concern, Recommendations and Areas for Improvement identified by HMICFRS since previous PEEL Inspections.

Report	Cause of concern	Recommendation	Area For Improvement	Current Status
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19	The capacity and capability for West Yorkshire Police to effectively deal with investigations involving vulnerability is a cause of concern.	12486: HMICRS recommends that:  The force should ensure that officers and staff have appropriate professional skills and experience to investigate complex cases involving vulnerable victims and that these are supervised effectively.		Still live 07/20
		12485: HMICRS recommends that:  The force should review its capacity and capability across the five district safeguarding units and ensure that workloads are manageable and aligned to demand and risk. It should also ensure that adequate welfare and support is available for the officers and staff working within them.		Still live 07/20
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19			12494: The force should ensure that it raises confidence among its workforce in the anonymity of its confidential reporting facilities for staff to report wrongdoing.	Still live 07/20
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19			12493: The force should ensure that it can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse.	Still live 07/20
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19			12492: The force should ensure that its internal ethics committee becomes more relevant to the workforce and that its findings are better communicated.	Still live 07/20
PEEL: Police Effectiveness, Efficiency and			12491: The force should take steps to understand its investigation outcome data and	Still live 07/20

				Item
Legitimacy 2018/19			to ensure that it is pursuing justice on behalf of victims of crime.	
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19			12490: The force should improve its ability to retrieve digital evidence from mobile phones, computers and other electronic devices quickly enough to ensure that investigations are not delayed.	Still live 07/20
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19			12489: The force should ensure that all evidence is retrieved at the first opportunity and initial statements are completed to a high quality to maximise the likelihood of investigations being conducted successfully.	Still live 07/20
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19			12488: The force should ensure that supervisors are equipped with the necessary skills needed for effective supervision of investigations and that there is sufficient capacity within the sergeant rank for intrusive supervision to take place.	Still live 07/20
PEEL: Police Effectiveness, Efficiency and Legitimacy 2018/19	West Yorkshire Police is failing to place enough resources into tackling potential corruption within its workforce. This is a cause of concern.	12487: HMICFRS recommends that:  The force should ensure that it has enough capability and capacity to counter corruption effectively and proactively.		Closed 05/20
PEEL: Police Effectiveness 2017 West Yorkshire Police	The quality of West Yorkshire Police's initial enquiries, its supervision and its general standard of investigation is a cause of concern	8931: HMICFRS recommends that:  <ul style="list-style-type: none"> <li>• The force should provide frontline officers with training and operational experience to ensure that they are able to retrieve forensic evidence from scenes of crime.</li> <li>• The force should develop a policy outlining minimum investigative standards and roles and responsibilities of officers and supervisors.</li> <li>• The force should ensure that all those carrying out investigations are provided with appropriate training and support.</li> </ul> <ul style="list-style-type: none"> <li>• The force should ensure that there is regular and active supervision of investigations to improve quality and progress.</li> </ul>		Still live 07/20

		<ul style="list-style-type: none"> <li>• The force should improve its process for and supervision of handovers to ensure all relevant information passed to investigators is complete and of sufficient quality.</li> </ul>	
PEEL: Police Legitimacy 2017	<p>HMICFRS is concerned that forces are not able to demonstrate that the use of stop and search powers is consistently reasonable and fair. In particular, there is overrepresentation of BAME people, and black people in particular, in stop and search data which many forces are unable to explain.</p>	<p>8540: HMICFRS recommends that:</p> <p>1. By July 2018, all police forces across England and Wales should be regularly and frequently monitoring a comprehensive set of data and information on use of stop and search powers to understand:</p> <ul style="list-style-type: none"> <li>• the reasons for any disproportionate representation of different ethnic groups in the use of stop and search;</li> <li>• the extent to which find rates differ between people from different ethnicities, and across different types of searches (including separate identification of find rates for drug possession and supply-type offences); and</li> <li>• the prevalence of possession-only drug searches, and the extent to which these align with local or force level priorities.</li> </ul> <p>2. Where forces identify disparities through monitoring, they should demonstrate to the public that they have:</p> <ul style="list-style-type: none"> <li>• carried out research and analysis in an attempt to understand the reasons for the disparity, and</li> <li>• taken action to reduce the disparity, where necessary;</li> </ul> <p>3. We expect forces to publish this analysis and any actions taken at least on an annual basis, from July 2018.</p> <p>4. By July 2018, and ongoing following that date, forces should ensure that all officers who use stop and search powers have been provided with, and</p>	Still live 07/20



		understand, training on unconscious bias and College of Policing APP on stop and search.		
PEEL: Police Legitimacy 2016	HMIC is concerned that some forces are failing to comply with current national vetting policy. This means that these forces are employing individuals who have not undergone even basic vetting checks, which represents a significant risk to the integrity of the organisation.	6130: HMIC recommends that: <ul style="list-style-type: none"> <li>•Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so.</li> <li>•Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles.</li> </ul>		Closed 07/19
PEEL: Police Legitimacy 2016	HMIC is concerned that some police counter-corruption units do not have the capability or capacity to seek intelligence on potential abuse of authority for sexual gain. This means that forces are not able to intervene early to safeguard potential victims and tackle unacceptable and potentially corrupt behaviour.	6032: HMIC recommends that: <p>Within six months all forces should have started to implement a plan to achieve the capability and capacity required to seek intelligence on potential abuse of authority for sexual gain. These plans should include consideration of the technology and resources required to monitor IT systems actively and to build relationships with the individuals and organisations that support vulnerable people</p>		Closed 07/20
PEEL: Police Legitimacy 2016	HMIC is concerned that forces do not always recognise the problem of abuse of authority for sexual gain as a form of serious corruption. This means that this understanding is not always being reflected in the force's IPCC referral decisions, and there is no clear picture of the scale of the problem throughout police forces.	6087: HMIC recommends that: <ul style="list-style-type: none"> <li>•Within three months, all forces should complete a retrospective review of allegations and consider referrals to the IPCC.</li> <li>•Within three months, forces should establish effective procedures to identify all future allegations of abuse of authority for sexual gain as serious corruption matters and make appropriate referrals to the IPCC.</li> </ul>		Closed 06/18
PEEL: Police effectiveness 2016	HMIC found that in many forces there is a material lack of focus, grip and effective activity directed to apprehending wanted suspects. There are too often inconsistencies and weaknesses in how rapidly forces circulate information about wanted suspects on the Police National Computer (PNC), and too often inadequate efforts are made to apprehend these individuals once the information has been circulated.	8936: HMIC recommends that: <p>Immediately, all forces should review their current procedures for apprehending wanted suspects, assess the number of wanted suspects on the PNC and those whose details have yet to be circulated on the PNC, and take prompt and effective action to apprehend those suspects.</p>		Superseded 06/18

PEEL: Police effectiveness 2016	Cause of concern HMIC found that neighbourhood policing continues to be eroded. The police service is no longer consistently implementing elements of neighbourhood policing known to be effective in preventing and tackling traditional crime, and has not yet applied these to 21st century threats (online crime and so-called hidden and complex crimes).	8604: HMIC recommends that:  Immediately after the national guidance has been issued, all forces should review their own approach to neighbourhood policing to determine whether the service they provide to local communities meets these guidelines. As soon as practicable thereafter, they should put into effect any necessary changes to implement the national guidance.		Closed 07/19
PEEL: Police effectiveness 2016	HMIC found that the current approach to mapping organised crime groups is applied by forces in an unacceptably inconsistent way, giving an incomplete and inaccurate picture of the national threat. Given the severity and nature of organised crime, a more coherent and consistent approach is critical.	8768: HMIC recommends that:  Immediately, the responsibility for mapping organised crime groups should be transferred from individual police forces to regional organised crime units, and this transfer should be completed no later than September 2017.		Closed 08/19