RESPONSE TO 'POLICE EFFECTIVENESS, EFFICIENCY AND LEGITIMACY 2018/19:
AN INSPECTION OF AVON AND SOMERSET CONSTABULARY' PUBLISHED ON 7TH FEBRUARY 2020

I welcome this latest PEEL report as it is the single most important report from which assurance can be taken on the performance of the Constabulary. I was pleased to see that the Constabulary has maintained the grading of good in effectiveness and legitimacy and improved to outstanding in efficiency. This improvement has been driven by how the Constabulary plans for the future and this grading confirms the perception that Avon and Somerset is a forward thinking force. Being efficient as a force is a great platform on which to build improvements in effectiveness and legitimacy in order to become outstanding in all three pillars – a shared aspiration of myself and the Chief Constable.

The areas for improvement (AFI) are noted as:

- The constabulary should continue with its plans to ensure effective monitoring of a comprehensive dataset on the use of force.
- The constabulary should continue with its plans to ensure effective monitoring of a comprehensive dataset on stop and search.
- The force should ensure all staff have received at least the lowest level of vetting clearance for their roles and clear any backlogs, ensuring it is fully compliant with the national vetting guidelines.
- The force should monitor vetting decisions to identify disparities and disproportionality (e.g. BAME groups) and act to reduce them where appropriate.
- The force should ensure it has a counter-corruption strategic threat assessment and control strategy that meets the force's needs to help it understand and manage the risk corruption poses to the organisation.
- The force should ensure it has enough capability and capacity in its counter-corruption unit to be effective in its proactive approach to counter corruption; has full information technology (IT) monitoring to effectively protect the information contained within its systems; and build effective relationships with the individuals and organisations that support and work with vulnerable persons.

I recognise the importance of the themes in these AFIs and their links to legitimacy, maintaining public confidence and policing by consent. Below sets out my response to these AFIs.

📍 Avon and Somerset Police and Crime Commissioner, Valley Road, Portishead, Bristol. BS20 8JJ

📞 01278 646 188 | 🐦 @aandspcc | 📘 aandspcc | ✉ pcc@avonandsomerset.pnn.police.uk | 🌐 avonandsomerset-pcc.gov.uk

<u>Use of force and stop and search</u>

The use of data and analytics is a great strength of the Constabulary and it has processes in place to capture data about the use of force and stop and search. This data is visualised and democratised through the use of Qlik. The apps show details of the incidents e.g. type of force used, reason for stop search and outcomes as well as personal characteristics of those subject to powers, this can be analysed across different areas of the force and different times allowing the identification of themes or patterns. The use of force app now has a part dedicated to the use of Taser because of the particular impact use of this force can have on public confidence.

As well as providing strategic oversight and governance this data is also available for supervisors. There is an expectation that these tools are used, with a suite of many others, in order to be able to manage the performance of individual officers and teams and providing opportunity for personal learning. The Professional Standards Department (PSD) also have access to this and other data in order that they can be proactive and monitor concerns about any particular officers.

In quarter three of 2019/20 the force established internal scrutiny panels for both use of force and stop and search. The panels meet quarterly and focus on key areas raised by HMICFRS.

These internal panels work in connection with the external Scrutiny of Police Powers Panel (co-ordinated by my office) and the Independent Advisory Groups through involvement of the Chairs.

The output from this work is now reported in the quarterly bulletins which are published on the website for transparency. The web pages for use of force were re-designed, following feedback from the panel, in order to make them more user friendly and ensure the public were being given the information they wanted.

The governance of these areas has been further strengthened, particularly in respect of equality/disproportionality, as they are now scrutinised at the Inclusion and Diversity Board chaired by the Deputy Chief Constable.

One of the Constabulary's values is learning and it will continue to use the insight from the data and the scrutiny panels to ensure it drives meaningful improvements in service delivery and its use of police powers.

<u>Vetting</u>

The concerns about vetting were recognised as significant and a Gold Group was run by the Constabulary between November 2019 and March 2020. At the end of November 2019 the total unprocessed applications was around 750 but at the time of writing this has reduced to approximately 190 (50 of these are waiting on national security vetting to progress). The response to clear the backlog has not just been one-off crisis management but instead has focused on sustainable improvements in ways of working demonstrated by the below measures:

📍 Avon and Somerset Police and Crime Commissioner, Valley Road, Portishead, Bristol. BS20 8JJ

📞 01278 646 188 | 🐦 @aandspcc | 📘 aandspcc | ✉ pcc@avonandsomerset.pnn.police.uk | 🌐 avonandsomerset-pcc.gov.uk

- Average time to start processing has reduced from 44 to 9 days (April - December 2019 compared to 2020).
- Average time to complete processing has reduced from 13 to 6 days (April - December 2019 compared to 2020).
- All PCDA applications (recruitment of new officers) have been cleared through to the planned July 2020 intake.

These sustainable improvements have been achieved in a number of ways. The national officer uplift programme is resulting in a large increase in recruitment in a short period of time. The Constabulary recognised that to be able to cope with this demand it needed to increase the resource in the team and has already recruited an additional senior vetting advisor and four additional vetting researchers.

Applications are now entirely paperless and instead use an electronic web based vetting application form. This removes the need for double keying and consequently reduces the amount of data quality errors and time spent to rectify these errors. The electronic form now has mandatory fields that the applicants are required to fill reducing staff time chasing missing information. The Constabulary have also made the 'persons you have previously lived with' section of the application time specific and relevant thus making the research conducted more focused.

As with other areas of the business data is now visualised using a Qlik app which supports monitoring and decision making about demand, capacity and workflow within vetting.

In addition to these improvements already made the force has two other significant actions underway. The aim is that, by May 2020, robotic process automation, will be utilised which would allow 75% of the process to be completed automatically. This would leave the investigator free to finalise the process and make the decision on the applicant (which should not be automated). Further to this the force will outsource vetting of contractors (to a nationally offered service) which will further reduce demand on internal vetting staff.

In relation to aftercare and continued monitoring a review of posts across the organisation has taken place to confirm correct levels of vetting are attached to the roles. The force are moving towards a mandatory annual review of persons in, the higher, DV and MV roles in addition to the mandatory seven year full review.

In an effort to identify and reduce disproportionality in the vetting process the Constabulary now capture ethnicity and other protected characteristics using the new online application form. At the time of writing Qlik is being developed in order to be able to visualise and scrutinise this data and the next step is to upgrade the vetting system to enable all protected characteristics to be monitored routinely.

All senior leaders in Vetting and the wider PSD have attended cultural intelligence training and all front line Vetting and PSD staff have had input on this subject as part of days for continued professional development. This development included input from staff support groups and externally from Stand Against Racial Inequality (SARI). Inclusions and diversity forms part of departmental improvement plans and the department is also represented at national events on this topic.

📍 Avon and Somerset Police and Crime Commissioner, Valley Road, Portishead, Bristol. BS20 8JJ

📞 01278 646 188 | 🐦 @aandspcc | 📘 aandspcc | ✉ pcc@avonandsomerset.pnn.police.uk | 🌐 avonandsomerset-pcc.gov.uk

Vetting decisions, particularly vetting refusals, are monitored through supervisory oversight and an Independent Vetting Appeals process. The appeals panel includes a member of the Inclusion and Diversity team in order to bring the relevant expertise and perspective.

Counter-corruption

The Constabulary have an annual PSD and counter-corruption strategic threat assessment and control strategy which was published in 2019. The Constabulary contributes submissions and updates to the Regional Threat Assessment which in turn feeds into the National Threat Assessment. The team also attends and contributes to the Regional Counter-Corruption working group to understand regional threats.

An internal governance structure is in place based on the National Intelligence Model with a tactical tasking cycle, informed by a monthly tactical assessment updating against the identified control strategy areas. Scanning for this tactical assessment includes all the corruption threats as identified by the national recording standards. The Tactical Tasking Coordination Group is chaired by the DCI who receives updates from each of the thematic leads. This feeds into the force's Standards and Confidence Board chaired by the DCC and attended by the Head of PSD. In this respect that Board's role is akin to the Strategic Tasking Coordination Group.

In response to HMICFRS feedback and in anticipation of the officer uplift programme it has been agreed to expand the resources available within the Counter-Corruption Unit (CCU). The intelligence department has almost doubled in size with the recruitment of an additional researcher and two intelligence investigators. The intelligence cell now comprises an intelligence manager, analyst, two researchers and two intelligence investigators. The focus is on an intelligence driven CCU model offering opportunities to be both preventative and proactive.

To assist with the proactive investigation work, two extra police staff investigators have been recruited for the CCU. The CCU now has a D/Inspector, a D/Sergeant and 12 staff. This meets the national average for a Constabulary the size of Avon and Somerset; as set out in the Spotlight report, "Shining a Light on Betrayal". The team are also gathering data via Qlik in a three tiered approach; geographical, environmental and scanning.

The Constabulary is committed to effectively protecting information contained within its IT systems. It currently uses monitoring software but recognises some of the limitations with this. A procurement review of alternative products is underway which is due to report imminently in order that the force may improve its technological solution. The ambition is to implement this change for greater capability in line with the national HMICFRS recommendation issued to NPCC leads: this should be achieved by Autumn 2020.

The CCU has established links with key teams/agencies that support vulnerable people: these include the Lighthouse victim and witness care service, specialist victim support services for victims of domestic and sexual abuse as well as Knightstone Housing Association. The department is always looking to expand its network and has recently been looking to other types of groups such as One25. Through these links guidance is provided to staff making them aware of the signs and signals of the abuse of position for a sexual

📍 Avon and Somerset Police and Crime Commissioner, Valley Road, Portishead, Bristol. BS20 8JJ

📞 01278 646 188 | 🐦 @aandspcc | 📘 aandspcc | ✉ pcc@avonandsomerset.pnn.police.uk | 🌐 avonandsomerset-pcc.gov.uk

purpose and how to report concerns; regular contact and visits are made to ensure that new staff are educated. In 2018 the Constabulary implemented an external anonymous reporting mechanism accessed via the website specifically highlighting what amounts to an abuse of position for a sexual purpose and requesting information and reporting.

In summary I feel the Constabulary have responded well to the AFIs raised in this report. Although there is still some room for improvement significant progress has been made against these recommendations.

This response is published on the OPCC website (https://www.avonandsomerset-pcc.gov.uk/Openness/Audits-and-Inspections/HMICFRS.aspx).

 Avon and Somerset Police and Crime Commissioner, Valley Road, Portishead, Bristol. BS20 8JJ

 01278 646 188 | @aandspcc | aandspcc | pcc@avonandsomerset.pnn.police.uk | avonandsomerset-pcc.gov.uk