



POLICE & CRIME COMMISSIONER

The Nottinghamshire Police and Crime Commissioner's response to the publication of Her Majesty's Inspectorate of Constabulary's (HMIC) - PEEL: POLICE EFFECTIVENESS 2016

[The report can be found here](#)

On 2nd March 2017, HMIC published its PEEL: Police Effectiveness report (2016) following its inspection in September 2016. HMIC examined how effective the Force is at keeping people safe and reducing crime. This year HMIC found that Nottinghamshire Police 'Requires Improvement' overall in Police Effectiveness and graded four specific areas as follows:

Overall summary

How effective is the force at preventing crime, tackling anti-social behaviour and keeping people safe?



Requires improvement

How effective is the force at investigating crime and reducing re-offending?



Good

How effective is the force at protecting those who are vulnerable from harm, and supporting victims?



Inadequate

How effective is the force at tackling serious and organised crime?



Good

How effective are the force's specialist capabilities?

Ungraded

I have read the report and discussed it with the Chief Constable and pleased that HMIC found that Nottinghamshire Police is good at investigating crime, reducing re-offending and tackling serious and organised crime. However, I am very concerned that HMIC found the Force inadequate at protecting those who are vulnerable from harm, and supporting victims. While I accept the findings of this report, I'm a little disappointed that it doesn't recognise the steps that were already in place at the time of the inspection and those that have been implemented since then, which are designed to address the issues that it raises as 'requiring improvement'.

However, whilst I am assured that a number of measures have been put in place to address HMIC concerns, I have, nevertheless asked the new Chief Constable to provide me with a



written response to every area of criticism contained within the report. **Annex 1** of this written response to HMIC provides a copy of the assurance template I am using to track progress.

Furthermore, I have decided to escalate the level of scrutiny to ensure that victims are fully protected and supported and that systems and procedures are thoroughly robust to ensure that these findings are never repeated. In this respect the following actions have and will be undertaken:

1. I have submitted a report to the Police and Crime Panel on 24th April 2017 detailing my response to this HMIC inspection and my intention to escalate the scrutiny to obtain assurance on every point of criticism. I intend to send the Panel the questionnaire when it is fully completed to my satisfaction.
2. In addition, to obtaining written assurance on all points of criticism, it is my intention to go further by asking my internal auditors to test some of the new procedures implemented by the Force to ensure that vulnerable victims will never be exposed to the risk identified by HMIC. In this respect, my auditors will:
 - a. Review every point of criticism relating the management of **domestic incidents** as identified in the Assurance Framework Template to provide me with assurance that that victims are not exposed to any further risk.
 - b. Review every point of criticism relating to the need to better **understand local communities** identified in the Assurance Framework Template to provide me with assurance that officers do understand the risks they face, together with their vulnerabilities and their priorities.
3. Finally, I will seek to obtain further assurance personally through the Chief Constable by undertaking more detailed assurance checks into those areas highlighted as a concern.

In addition, to the completion of the template shown in **Annex 1**, the Force will continue to use its dedicated 4ACTION database for tracking and responding to HMIC recommendations and areas for improvement. The Force provides regular HMIC update reports to my Joint Audit and

Scrutiny Panel (JASP) who provide additional scrutiny in these important areas and it will be my intention that a further update of this Assurance Template be provided to the next JASP.

Yours sincerely



Paddy Tipping
Police and Crime Commissioner

ANNEX 1 – ASSURANCE MONITORING TEMPLATE (FORCE RESPONSE)

Report Ref	Page Ref	ISSUE OF CONCERN	ACTION TAKEN TO ADDRESS CONCERN
1	Page 5	Notts has 30% more calls for assistance than national average 313 v 240/1000 pop – may explain why they have to keep abstracting neighbourhood officers to response duties	
2	Page 7	The force's understanding of the communities it serves, the risks they face and their priorities is limited.	
3	Page 8	Local teams still do not have sufficient information to enable them to improve their understanding of local communities	
4	Page 8	Although neighbourhood officers attend incidents of anti-social behaviour and emergency incidents in their area they are also often taken away, on a pre-planned basis, to support response teams in other areas. This affects their ability to work with partner organisations on longer-term problem-solving and crime prevention.	
5	Page 8	The force does not evaluate operations consistently and does not always identify and share good practice across the force or with partner organisations; doing so would help it improve its approach to preventing crime and anti-social behaviour.	
6	Page 8	It continues to demonstrate an insufficient understanding of the nature and scale of vulnerability and does not work well enough with partner organisations to share information to prevent crime and protect vulnerable victims.	
7	Page 8	The use of risk assessments in the control room at initial contact and the recording of the rationale for attendance are inconsistent. When the control room and response teams are busy, how quickly the police respond is too often determined by the availability of response officers rather than the risks faced by victims. This weakness is compounded by the force's current shortcomings in recording crime properly. The force cannot be confident that all victims are getting the service they need when they need it.	
8	Page 13	Nottinghamshire Police recently identified serious problems in its compliance with the national crime-recording standards (NCRS).	
9	Page 13	During fieldwork, HMIC identified serious concerns with crimes still not being recorded for those incidents that are not allocated to an officer...they include crimes of domestic abuse where victims have not been visited, in some cases for many weeks, and are not recorded as a crime.	
10	Page 14	Nottinghamshire Police has a limited detailed understanding of the communities it serves and the risks they face and their priorities.	
11	Page 14	Although neighbourhood officers attend incidents of anti-social behaviour and emergency incidents in their area they are also often taken away, on a pre-planned basis, to support response teams in other areas. This affects how well they work with partner organisations on longer-term problem-solving and crime prevention.	



12	Page 14	We said that the force should ensure that its local teams have sufficient information available to enable them to improve their understanding of local communities. This situation has not improved.. local policing teams still do not have access to a comprehensive range of information.	
13	Page 15	In some areas there is a good understanding, for example, the community cohesion team in Nottingham has good links with minority communities, including Polish, Kurdish and Somali. However, this understanding is not widespread	
14	Page 15	There are inconsistent local arrangements to meet with communities and sometimes a limited understanding of their priorities.	
15	Page 15	Advertised meetings, for example beat surgeries, are often poorly attended and the force website is not always kept up to date on the actions taken and outcomes achieved.	
16	Page 15	Ipsos MORI to conduct a survey of attitudes towards policing between July and August 2016. The survey indicated that there has been a decrease in public satisfaction with Nottinghamshire Police	
17	Page 16	Some neighbourhood officers are often taken away from their primary role of problem solving and working with people, in order to provide support to response teams. Officers and representatives from community safety partnerships, who work closely with the police, explained to us that this sometimes has an adverse effect on their community work and impedes their ability to prevent crime and tackle anti-social behaviour	
18	Page 16	There has been a considerable decrease (56 percent) in the number of recorded repeat victims of anti-social behaviour. However, the force is not certain about the reasons for this as an evaluation of different tactics and 'what works' is still developing	
19	Page 20 Figure 4	Prosecutions prevented or not in the public interests (3.2%) much higher than national average (1.8%)	
20	Page 21	Control room and response teams are not always able to deal effectively with calls which require a prompt response. While the desired staffing levels are based on a demand management model, the actual number of officers and staff is considerably below this level.	
21	Page 21	Other demands on police time, such as looking after very vulnerable people who are in custody, are also having an adverse effect on the ability to investigate crime initially.	
22	Page 21	All customer service advisers are trained to assess the risks in each call for service, using a structured triage process to decide on how a call is graded, but the use of the process and the recorded rationale for attendance is inconsistent.	
23	Page 21	When risk has been appropriately assessed by the call-taker, some calls are downgraded when the control room is very busy and there are not enough police resources available to respond promptly. Some calls that have originally been assessed as needing a prompt response are being downgraded to a slower response especially when the perpetrator is not at the scene, with an officer visiting much	

		later by appointment. This means some high-risk victims do not receive a visit for several days.	
24	Page 21/22	Also, many unassigned incidents remain open for weeks, with no crime recorded, when staff in the force control room make repeated attempts to arrange appointments to see the victim.	
25	Page 22	Supervisors and managers provide oversight and review but they do not always record these observations on investigation plans consistently	
26	Page 23	The force has the ability to look at handsets, but where this analysis is required for evidential purposes there can be a delay of up to three months while this is produced. National Report: (Page 57) 6th highest Digital backlogs per 1,000 population.	
27	Page 25	Victims are offered the opportunity to provide a victim impact statement but investigators do not routinely use victim care plans to ensure continued safeguarding ¹ for victims and witnesses. Of 31 cases examined, where a safeguarding plan would be expected, only one third of these documented an on-going safeguarding plan.	
28	Page 26	Where there are positive forensic 'hits' against suspects, they are pursued relentlessly with the aim of detaining them within 24 hours. However, some arrest actions are placed on the response briefing and tasking system (BATS) and due to call demand these may not be dealt with for some time.	
29	Page 26	The force aims to conduct criminal record checks ² as standard practice on all arrested foreign nationals but at the time of inspection this was not being achieved; these would provide enhanced information on criminality and allow the force to identify and manage risk better	
30	Page 27	The force has worked to improve supervision rates but after a successful recruitment process, gaps still remain in staffing levels.	
31	Page 28	There is a lack of capacity within the response officer teams during periods of high demand which is affecting the force's ability to respond effectively to some calls for service.	
32	Page 30	Forces define a vulnerable victim in different ways. This is because there is not a standard requirement on forces to record whether a victim is vulnerable on crime recording systems. Some forces use the definition from the government's Code of Practice for Victims of Crime, ³ others use the definition	

¹ The term safeguarding is applied when protecting children and other vulnerable people. The UK Government has defined the term 'safeguarding children' as: "The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully."

² The National Police Chief's Council (formerly ACPO) criminal records office manages criminal record information and is able to receive/share information with foreign countries in relation to foreign offenders arrested within the United Kingdom.

³ Code of Practice for Victims of Crime, Ministry of Justice, 2013. Available from www.gov.uk/government/uploads/system/uploads/attachment_data/file/254459/code-of-practicevictims-of-crime.pdf

		referred to in ACPO guidance ⁴ and the remainder use their own definition.	
33	Page 31	The force has an insufficient understanding of the nature and scale of how to identify and protect those who are vulnerable. In HMIC's 2015 effectiveness inspection report, we said that the force needed to improve its response to child sexual exploitation by developing its understanding of the nature and scale of the problem, and ensuring that preventative activity is properly co-ordinated. The force has a draft child sexual exploitation problem profile .	
34	Page 31	Nottinghamshire Police suffers from a lack of data from partner organisations to understand all the issues fully, as it did last year. The draft profile does not refer to the child sexual exploitation problem profile produced by the regional analyst or the four recommendations contained within it that are specific to Nottinghamshire Police	
35	Page 31	The missing and absent persons problem profile does not cross-reference adequately the links for young people who go missing with the risks of child sexual exploitation, as it was developed after the draft child sexual exploitation profile.	
36	Page 32	The force has identified serious problems in its crime-recording compliance with National Crime Recording Standards (NCRS). It has plans to improve crime-recording at the first point of contact but these are not in place yet and the problem continues.	
37	Page 32	The identification of vulnerable and repeat victims is inconsistent at the first point of contact. For example, the use of flags and qualifiers on force IT systems to indicate if a person is vulnerable or is a repeat victim of crime is inconsistent, and a check on databases for repeat victims and offenders relies on the same spelling or input of name details.	
38	Page 32	The assessment of threat and risk and the subsequent rationale to allocate a grading to the call is not always fully recorded, and there is no clear recorded supervision of the rationale being checked on the incident log.	
39	Page 33	The force reports that on most days there are 130 unallocated incidents and these are described as lower-risk incidents. During our fieldwork, we found 247 unallocated incidents , none of which had been assessed to see if a crime needed to be recorded. Of these, 61 were domestic incidents and when these were examined, 23 incidents were immediately brought to the attention of the force because of serious concerns regarding welfare and safeguarding.	
40	Page 33	There is limited recorded supervision for these unallocated incidents.	
41	Page 33	There are significant delays in attending some of these incidents; one domestic related incident had still not been	

4 The Association of Chief Police Officers (ACPO) is now the National Police Chiefs' Council (NPCC). ACPO Guidance on Safeguarding and Investigating the Abuse of Vulnerable Adults, NPIA, 2012. Available from: www.app.college.police.uk/app-content/major-investigation-and-public-protection/vulnerable-adults/

		attended after four weeks and the victim did not wish to have any further police contact. Appointments are booked with victims and witnesses, but sometimes these appointments take place a considerable time after the incident.	
42	Page 33	The appointments which involve a domestic abuse incident are booked for a two-hour slot, which means that although this gives sufficient time to conduct an initial investigation, it means that there is sometimes a lack of resources to cover other appointments.	
43	Page 33	Decisions not to attend incidents or delays in attending are too often based upon lack of resources rather than an assessment of threat, risk and harm.	
44	Page 33	HMIC has concerns with the recording of the THRIVE assessment. Although staff recognise individuals who are vulnerable, they do not always fully record the circumstances of their assessment on the incident log, which makes it harder to assess if the correct response has been provided	
45	Page 33	Supervisors who oversee calls and their subsequent grading do not see the full picture unless they also listen to the original call. When the control room and response teams become busy, some of these calls are re-graded to a slower response and this may not always be appropriate. This means the force's ability to understand the level of risk victims face is limited.	
46	Page 33	HMIC is seriously concerned about the number of incidents which remain unallocated and which involve victims who are vulnerable, particularly domestic abuse victims. At the time of our inspection, there were 61 domestic-related incidents where the victim had yet to receive a visit from the force, the oldest of which dated back four weeks . This level of backlog is unacceptable. It means that the force is not giving vulnerable victims any form of protection for several days and is missing valuable opportunities to collect evidence and move an investigation forward.	
47	Page 35	However, in this inspection we found that the understanding of stalking and harassment behaviour is still poor; there was one recent case which showed an alarming history of stalking by the offender having been resolved by the inappropriate use of a harassment warning. (PG: despite the training given).	
48	Page 36	However, risks to children within the household are not always identified well and the 'voice' of the child is not always recorded. There is some confusion among response officers about when a child referral form should be completed and the fact that they should actually talk to the child rather than just record their living conditions.	
49	Page 37	In this inspection, we found the backlog had been considerably reduced, but there were 171 DASH forms still awaiting secondary assessment by domestic abuse specialists . We found that only those cases involving victims at high risk are thoroughly assessed and there is no escalation process in terms of repeat victimisation.	
50	Page 37	Moreover, repeated incident reports relating to domestic abuse but graded as standard risk would not receive any additional scrutiny or review by partner organisations. It is unclear	

		whether children's services would escalate any child referrals within this context , so it is therefore possible that nothing would be done to limit the effect on a child's welfare in respect of exposure to on-going domestic abuse.	
51	Page 37	However, there is inconsistency across the force area in how the processes work and the type of information shared between the multi-agency safeguarding hub (MASH) located in the county area, involving Nottinghamshire County Council and the domestic abuse referral team (DART), covered by Nottingham City Council. For example, in the MASH there are daily 'Encompass' meetings to review all high and medium-risk domestic abuse incidents where a child lives within the family unit and a referral is made to the education authorities. This allows for the early exchange of information and a safeguarding function with schools. There is no equivalent process in the city, and, in addition, city-based partner organisations which were co-located with police have moved out to other premises. This reduces the opportunities for sharing information and working together.	
52	Page 39	The force does not refer all high-risk cases to multi-agency risk assessment conferences (MARACs) . High risk domestic abuse victims are those who are at risk of murder or serious harm and the criteria differ between the county and city areas for those cases that will and will not be considered. In this inspection we again saw that this triage process does not involve all partner organisations and is contrary to national guidance .	
53	Page 39	Three high-risk referrals from the police and nine high-risk referrals from other partner organisations were removed from the MARAC agenda . The force reports that although it is willing to meet more often some partners state that they are unable to provide sufficient resources. This has been recorded formally in those partner agencies concerned but there remain serious concerns about the process of triaging high-risk cases out of MARAC meetings.	
54	Page 45/46	Although the link to the strategic assessment is not clear. It has not yet adopted the MoRILE risk assessment process, which is the preferred model of assessment within the East Midlands region. The force currently assesses the threat and risk from organised crime using a risk assessment methodology which does not consider the capability or capacity of the force to deal with the problem, and is limited in how it assesses vulnerability in its communities .	
55	Page 46	In last year's report we identified that, although the mapping process is carried out thoroughly by the regional team, it is sometimes unnecessarily lengthy. The time taken to complete this mapping process has not improved over the last twelve months and, while this does not impede the force in carrying out urgent activity against OCGs, it means that the full range of tactics available through regional arrangements may not be immediately used.	
56	Page 47	Data for the profile has been drawn primarily from OCG mapping and there are some references to 'partner	

		<p>perspectives', but these lack detail. The force explains that limited information is provided by partner organisations and further partnership data is required to improve the profile and expand it so that it covers the whole force area. This means the profile is limited in how it can assist the police and partner organisations to identify the effect of organised crime groups.</p>	
57	Page 48	Nottinghamshire Police also has some specialist capabilities of its own in these areas which are additional to those provided at a regional level; however, it has yet to complete an action plan in response to a recommendation in HMIC's 2015 report on Regional Organised Crime Units ³⁵ about the potential for duplication of specialist capabilities between the force and the EMSOU.	
58	Page 49	Operation Vanguard team: While staff in this team are aware that the force's priorities are to cut crime and keep people safe, they have limited knowledge of the national serious and organised crime priorities. Work assignments do not routinely assess the threat, harm and risk of the organised crime group or its impact on local communities. HMIC is concerned that the Operation Vanguard team does not currently use a structured approach to risk management to identify priority offenders. As a result, those potential offenders who pose the most risk to the community may not be identified and the risks that they pose may not be managed effectively.	
59	Page 58	National Report: A digital forensic kiosk is a smaller facility for the retrieval of forensic information from digital devices so can situated in police stations and custody suites. Cambridgeshire, Cheshire, Gloucestershire, GMP, Humberside, Merseyside, North Wales and Nottinghamshire all excluded from this graph as data not supplied .	
60	Page 62	National Report: Data from 31 forces indicate that, as of 30 June 2016, there were a total of 67,069 persons suspected of crimes who had not had their details circulated on the PNC. Cumbria, Dyfed-Powys, Gloucestershire, Gwent, Hertfordshire, City of London, Northamptonshire, North Wales, Nottinghamshire, Sussex, Thames Valley and Wiltshire forces could not provide this data.	
61	Page 63	National Report: Number of outstanding suspects per 1,000 population on force-based systems: Cumbria, Dyfed-Powys, Gloucestershire, Gwent, Hertfordshire, City of London, Northamptonshire, North Wales, Nottinghamshire, Sussex, Thames Valley and Wiltshire forces were unable to provide data on the number of outstanding suspects on force-based systems; therefore, they are excluded from this graph.	
62	Page 70	National Report: Figure 23: Notts has the highest proportion of registered sex offenders awaiting assessment, as a percentage of those currently managed as registered sex offenders in force – as at 1 July 2016.	
63	Page 77	National Report: Figure 25: Percentage point change in the percentage of police-recorded crime with a vulnerable victim identified, by force, for the 12 month to 31 March 2015	

		compared to 12 months to 30 June 2016 ⁵¹ Notts unable to provide this data.	
64	Page 85	National Report: Figure 28: Rate of 'Evidential difficulties: victim does not support action' outcomes recorded in the 12 months to 30 June 2016 for domestic abuse-related offences. Notts unable to provide this data.	
65	Page 109	National Report: We found a widespread lack of recognition of gangs: 26 forces informed HMIC that, as of 1 July 2016, they did not manage any urban street gangs or were unable to specify the number. Even some large metropolitan forces informed HMIC that they were responsible for a very low number of gangs. These included forces which cover large cities, such as Greater Manchester Police, Nottinghamshire (none see figure 34) Police and Hampshire Constabulary	

Areas for improvement

Report Ref	Page Ref	ISSUE OF CONCERN	ACTION TAKEN TO ADDRESS CONCERN
1	Page 18	The force should work with partner organisations to share information and improve its understanding of local communities.	
2	Page 18	The force should evaluate and share effective practice routinely, both internally and with other organisations, to continually improve its approach to the prevention of crime and anti-social behaviour.	
3	Page 18	The force should ensure that its focus on crime prevention is not undermined by the redeployment of neighbourhood officers and staff to undertake reactive duties way from their assigned neighbourhood area.	
4	Page 42	The force should ensure that officers and staff understand how children can be affected by domestic abuse, and that there is a process to ensure they undertake safeguarding actions and make referrals to other organisations which have a role in safeguarding	
5	Page 42	The force should improve the way it works with partner organisations to share information and safeguard victims of domestic abuse and their children, specifically in relation to addressing the backlog of cases that require further assessment and referral to other organisations.	
6	Page 42	The force should improve its approach to safeguarding victims of domestic abuse who are assessed as high risk. It should review the referral process to multi agency risk assessment conferences to ensure that victims of domestic abuse are not being placed at risk as a result.	
7	Page 42	The force should work with partner organisations to improve its understanding of the nature and scale of vulnerability within its local area.	
8	Page 51	The force should further develop its serious and organised crime local profile in conjunction with partner	

		organisations to enhance its understanding of the threat posed by serious and organised crime.	
9	Page 51	The force should complete an action plan that sets out the steps it will take to maximise use of regional organised crime unit capabilities, minimise duplication at force level, and ensure that the use of shared regional organised crime unit (ROCU) resources is prioritised effectively between forces in the East Midlands region.	
10	Page 54	The force has assessed all the threats identified in the Strategic Policing Requirement, although there is a lack of depth and breadth to some of the assessments because they lack partnership data and input.	

Cause of concern

Report Ref	Page Ref	ISSUE OF CONCERN	ACTION TAKEN TO ADDRESS CONCERN
1	Page 41	Nottinghamshire Police is failing to respond appropriately to some people who are vulnerable and at risk at the initial point of contact. This means that early opportunities to safeguard victims and secure evidence at the scene are being missed, and victims are being put at risk.	

Recommendations

Report Ref	Page Ref	ISSUE OF CONCERN	ACTION TAKEN TO ADDRESS CONCERN
1	Page 41	Improves its initial assessment and response to incidents involving all vulnerable people, by ensuring that staff working in call handling understand and complete assessments of threat, risk and harm to appropriate standards, consistently record them on force systems and are supervised effectively;	
2	Page 41	Force response to incidents is determined by this initial assessment of risk in order to ensure victims are kept safe, and not by the availability of response officers	