



OPCC

Office of the Police &
Crime Commissioner
for Gloucestershire

12th October 2022

Response to HMICFRS report on the police response to burglary, robbery and other acquisitive crime. Finding time for Crime.

The attached report by HMICFRS [here](#) relates to the police response to burglary, robbery and other acquisitive crime.

Four key findings were identified and two recommendations were applicable to all UK police forces. I agree with the below response from the Assistant Chief Constable, Richard Ocone, and look forward to seeing how these recommendations are actioned.

Chris Nelson
Police and Crime Commissioner



Mr Richard Bradley
Chief Executive
Office Police and Crime
Commissioner
Gloucestershire

Our Ref: RO LFS 26092022
Email: Richard.Ocone@gloucestershire.police.uk
Date: 26 September

Dear Richard,

Re: The police response to burglary, robbery and other acquisitive crime. Finding time for crime.

Please find below our response to the above report, aimed at assisting you to meet the requirements of Section 55(1) of the Police Act 1996.

The report is a spotlight report which has been compiled using the findings from 2020/21 PEEL inspections and thematic inspections rather than an inspection in its own right.

This publication reported four key findings:

- Forces are missing opportunities to identify and catch offenders, from the Moment a member of the public reports the crime to the point where a case is Finalised
- Police are not doing all they can to help victims when they report crimes, in 71% of the burglary reports examined, police personnel did not give victims any advice on crime-scene preservation during the initial call;
- Forces lack investigative capacity and capability to effectively tackle burglary, Robbery and theft, often because of the national detective shortage and Inexperience; and
- Investigations are not being appropriately or thoroughly supervised, with a third Of cases examined having insufficient evidence of proper supervision.



Recommendation 1

By March 2023, forces should make sure their crime scene management practices adhere to the Authorised Professional Practice (APP) on managing investigations for Serious Acquisitive Crime (SAC) or provide a rationale for deviating from it. They should also include:

- Giving victims timely and appropriate advice during their initial call; and
- Applying a risk assessment process such as thrive, clearly recording it, and flagging those re-victimised for further support.

Recommendation 2

By March 2023, all forces should ensure SAC investigations are subject to effective supervision and direction. This should focus on:

- Making sure supervisors have the capability and capacity to meaningfully supervise investigations
- Making sure investigations meet the necessary standard and achieve suitable outcomes that consider the voice or opinion of victims;
- Applying investigative outcome codes appropriately; and
- Complying with the victims' Code and recording evidence of compliance.

You will note that the recommendations mirror some of the findings in our own PEEL assessment and will be aware that in June 2021 the Chief Constable declared a critical incident in relation to the Constabulary's recovery from the findings of the 2021/22 PEEL Inspection. This included the instigation of a gold, silver and bronze command structure. Outlined below are the key activities undertaken within those structures.

Activity to improve Crime Management and Investigation Standards (CMIS) includes:

Structure:

The creation of a CMIS command led by a Detective Superintendent, including the establishment of a Crime Standards Bureau, Investigation Standards, and Quality and Development functions.

Strategy:

The research, proposal and agreement of a long term sustainable solution to the crime recording and Crime Data Integrity (CDI) issues.



Performance:

Revisions to the Constabulary's Operational Policing Board (OPB), establishment of the Chief Constable's Performance Board (CCPB), and the creation of an overarching crime standards orientated performance dashboard. This included the recruitment of a new Head of Analysis, Research and Planning to improve our understanding of performance and enable us to perform better.

Communications:

A comprehensive internal communications campaign that was led by the new crime standards Detective Superintendent. This included a series of 12 short bite-sized videos with subject matter experts.

Training:

The creation and delivery of a crime standards training package, which was delivered to all frontline staff through the summer and autumn of 2021. This training included supervision of crime investigations and the standards expected. In particular:

- 689 frontline officers and staff have completed targeted NCRS/HOCR, Victims' Code of Practice (VCOP) and investigative standards workshops.
- 187 sergeants and acting sergeants have been trained across 7 crime standards days specifically designed for sergeants. These were focused on raising standards.

The Learning and Development team has also assessed all existing courses to address deficiencies identified by HMICFRS. This includes the addition of specific crime standards training to our Support, Inform and Prepare (SIP) programme for new supervisors, Initial Crime Investigators Development Programme (ICIDP) and D/Sgt and D/Insp courses.

The crime standards quality team is working closely with crime trainers and initial training at the Sabrina Centre to ensure training is fit for purpose and addressing the right areas of vulnerability.

Alignment:

The creation of corporate Personal Development Record (PDR) objectives linked to the critical incident.

Leadership:

A bespoke HMICFRS focussed session delivered in person to all senior leaders within the organisation via our Strategic Development Forum (SDF).



Activity to improve standards within the Force Control Room (FCR) includes:

Structure:

A FCR Effectiveness Board has been developed, now overseen by Chief Superintendent Probert and ACC Ocone, the board reports into the Chief Constable's PEEL Recovery meeting.

Policy:

A new grading policy began in January 2022 and provides specific attendance targets designed to improve our response to vulnerable people and improve safeguarding opportunities.

Staffing:

The historic baseline of the FCR was 93.6 Full Time Equivalent (FTE) but the Constabulary had been operating below that as recruitment took progressive effect. As of the end of August 93.3FTE police staff are within the FCR, with the addition of 4 police officers to support the department in call handler roles for approximately 12 months.

Recruitment continues and options are presently being explored to accelerate that until the new funded baseline of 123.6FTE is achieved.

The staff uplift as of July 2022 has been agreed as 30 FTE.

Training:

The FCR has two dedicated trainers and with the ability to train ten staff at any one time which ensures a high quality of initial training.

Training for new FCR staff is seven weeks in total, followed by a further two weeks of tutoring outside of the main room so as not to impact on business as usual but also taking live demand. Once independence is achieved the new staff member continues to be supported by a system of 'buddying'.

A dedicated FCR training suite has been developed and is now fully operational meaning all FCR training can be handled from the FCR within the GTEC building.

This is a significant improvement because it means new recruits are immediately immersed into their new working environment and alongside their new colleagues.

The training programme has been adapted to a progressive learning style, for example learn a particular system and then practice in the live environment, then continually build and practice moving through. The training has been updated with a particular focus on the 'Causes of Concern' and 'Areas for Improvement' highlighted in the HMICFRS report.



In relation specifically to Recommendation 1, the training input for call takers has also been revised. New staff get specific training on scene preservation from Scenes of Crime Officers (SOCO) on their induction, and we are currently back training all the existing FCR staff on the team training days. These forensic inputs are also provided to all new Police Officers as a part of their initial training and further forensic inputs are provided during courses for Criminal Investigation Inspectors, Sergeants and Police Staff Investigators.

Additionally, and of relevance to both recommendations, a triage team was established in the FCR in June consisting of 3 supervisors and 15 constables. The purpose of the team is to resolve incidents and crimes to provide better customer service to the public. Triage team officers speak to callers providing appropriate scene preservation and crime prevention advice. They also regularly support call handlers with this advice and are able to complete a feedback cycle into the FCR, thus improving quality within call handling, supervision and victim code compliance. At present the triage team are resolving approximately 40% of demand at the first point of contact.

Thrive:

Mandatory awareness sessions commenced on 5th September 2022 covering the use, articulation and recording of THRIVE+ assessments, as well as ongoing training at team training days. The feasibility and benefit of introducing an 'initial' victim needs assessment, in addition to the THRIVE+ at the first point of contact, is currently being examined.

Communication:

Internally all of the activity being undertaken in the FCR is communicated to the teams on Force Incident Manager's (FIM's) and supervisor away days, team leadership meetings on the shift overlaps, and in 1-2-1's. The Senior Leadership Team (SLT) also attend the team training days to support in delivering training (such as the relaunched THRIVE+ inputs) and also to communicate and support in the messaging direct to the staff. There are face to face communications every month for the FCR teams led by the SLT, as well as the usual departmental emails to support the teams each week.

ICT:

Significant work was needed to firstly stabilise, then upgrade the current systems within the FCR. Some of that stabilisation was broader than the FCR arena and had dependencies on other pieces of work taking place elsewhere within the Constabulary. The impact of the pandemic slowed the progress of some improvement and stabilisation work because the external companies involved and internal stakeholders did not have the capacity to progress work at the required pace. A dependency map, produced by the FCR effectiveness project team, demonstrates the complexity of the improvement work.



Key upgrades included the full installation of Smart STORM , Finesse/ Cortex integration, UCCE telephony upgrade, NICE voice recorder upgrade and the introduction of a customer relationship management system. The ICT upgrades will bring added efficiencies to the staffing uplift and new training programme in managing current demand

Victims Code of Practice (VCoP):

Within the CMIS structure, investment has been made into a Victim Strategic Coordinator on a one-year contract to look at our existing provision and improvements to victim service. Helen Pritchard started in the role in October 2021. She has undertaken research into the establishment of a Victims hub, with an options paper being submitted to the Forces Executive Board in September 2022.

VCoP templates have been imbedded within the force UNIFI system since December 2021, these require officers to provide certain details.

Constabulary Transformation Programme (CTP):

Running concurrently to the above activity Chief Superintendent Arman Mathieson's portfolio concentrates on the CTP. His work includes a review of our operating structures, seeking to better understand our demand and align our resources to that demand more accurately and effectively.

The Core-Records Management System (Core RMS) programme is part of this work because of the recognition that the current Core-RMS is in need of replacement and has a significant number of issues with its functionality and stability. The commitment to change from Unifi to Niche is an additional programme of work that will complement our activity to improve standards.

The constabulary is working hard to accelerate plans to implement changes to its local policing operating model whilst finalising the review of crime command functions. Better aligning our capability and capacity to the demand we have, particularly from incidents and crime, will sustainably drive up performance across the constabulary. At the same time we are reviewing the plans for our Force Control Room in light of the review completed by the Continuous Improvement and Innovation team project and the peer review completed by Humberside Constabulary. It is recognised that delivering these two key pieces of work will not only improve our performance in the areas fundamental to this particular report but also ensure successful navigation away from the 'engage' stage of HMICFRS monitoring.

I trust this provides you with an overview of activity being taken. Please do not hesitate to contact me should you require any further information.

Yours sincerely,



Richard Ocone

**T/Assistant Chief Constable 252434
Operations**

Gloucestershire Constabulary

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Appendix A

Unannounced inspection visit to police custody suites in Gloucestershire

Cause of Concerns and Recommendations

Ref	HMICFRS	Owner	Progress
1	Cause of Concern The force doesn't have good enough governance and oversight over how it provides custody, or of the outcomes for detainees. Senior managers only give limited scrutiny to custody matters. The information to support scrutiny is limited, and some of it is inaccurate. Poor recording on custody records makes it difficult to assess how well the force treats detainees and what has happened to them while in custody. There is little quality assurance over custody. Recommendation The force should strengthen its governance and oversight arrangements to make sure there is effective scrutiny of custody provision by: ensuring senior managers oversee important areas of custody provision Recommendation The force should strengthen its governance and oversight arrangements to make sure there is effective scrutiny of custody provision by: collecting and monitoring enough accurate information to show how well the force provides safe and respectful custody	Supt CJD	The first Strategic Custody Review Meeting took place on the 16th May 2022 to look at all areas of custody provision and governance. Data and performance information is to be reviewed at all meetings.

Ref HMICFRS	Owner	Progress
Recommendation The force should strengthen its governance and oversight arrangements to make sure there is effective scrutiny of custody provision by: making sure recording on custody records is accurate, to a high standard and clearly shows what has happened to the detainee while in custody Recommendation The force should strengthen its governance and oversight arrangements to make sure there is effective scrutiny of custody provision by: Having quality assurance arrangements in place to assess how well the force meets detainees' needs, identifying and addressing any concerns, and showing where it needs to make improvements.		
Cause of Concern The force isn't always meeting the requirements of code C of the Police and Criminal Evidence Act 1984 (PACE) for the detention, treatment and questioning of persons, particularly in terms of providing detainees with their rights and entitlements, and the way in which it carries out reviews of detention. It is also not complying with section 31 of the Children and Young Persons Act 1933 (also PACE code C paragraph 3.20A) in its care of girls in custody. Neither is the force consistently following the College of Policing's APP in important areas of custody provision.	Supt CJD	The new Criminal Justice Inspectors have been informed of the requirement for auditing of custody records and the need to improve the quality of records.

Ref	HMICFRS	Owner	Progress
	Recommendation The force should take immediate action to make sure all custody procedures and practices comply with legislation and guidance. This includes following APP guidance		
2	Cause of concern Use of force (UoF). There is little governance and oversight over the use of force in custody. Information to show how often and what force is used, and by which officers, is often inaccurate and sometimes missing. The force carries out few reviews of use of force incidents to assess how well it handles them. It can't show that when force is used it is necessary, justified and proportionate. Recommendation The force should scrutinise the use of force in custody to show that when force is used in custody, it is necessary and proportionate. This scrutiny should be based on accurate information and robust quality assurance, including viewing CCTV footage of incidents.	Supt CJD	Staff have been reminded to record the UoF within custody and update Electronic Detention Log (EDL).

Areas for Improvement

Ref	HMICFRS	Owner	Progress
1.1	The force should provide continuous training for detention officers so they remain up to date with the requirements of the role.	Supt CJD	Representatives from the Learning & Development Dept (L&D) have attend regional training meetings concerning the College of Policing guidance for custody training provision. The course provision is being reviewed around all aspects of training for custody.

Ref	HMICFRS	Owner	Progress
2.1	All officers and staff should recognise what constitutes an adverse incident and understand their responsibilities for reporting them	Supt CJD	A reporting system in place for adverse incidents There is good awareness of what constitutes as an adverse incident and near misses are regularly reported. Regular meetings are held with the Force H&S lead.
3.1	The force should strengthen its approach to meeting the individual and diverse needs of detainees by making sure that: menstrual care products are freely available and disposal arrangements are satisfactory;	Supt CJD	Menstrual care products fully available, including incontinence products for men. The Criminal Justice Inspector is reviewing procedures, which will be amended where necessary.
3.2	The force should strengthen its approach to meeting the individual and diverse needs of detainees by making sure that: it uses private telephone interpreting services at all points during detention where important information needs to be given or requested	Supt CJD	The new interpreter's contract started on the 20 th June 2022. Included within the contract is the use and provision of dual handsets for telephone interpreting.
3.3	The force should strengthen its approach to meeting the individual and diverse needs of detainees by making sure that: Sufficient religious texts and items for all the main faiths are available.	Supt CJD	Engagement with the Force Better Together Team, (who advise on aspects of Equality, Diversity & Inclusion) has been made to scope further opportunities for wider texts, Bibles, Qur'an, prayer mats or any other feasible requirement, some of which are already present in custody.
4.1	The force should improve its approach to risk by making sure that: custody officers triage queues for booking in	Supt CJD	Waiting times for booking in are now monitored as a part of performance and have found to be low. A technical solution is being explored to establish if a timer based system could start when a detainee is placed in the holding bay. The custody manual will then be amended to define a timeframe for when custody officers should review detainees.

Ref	HMICFRS	Owner	Progress
4.2	The force should improve its approach to risk by making sure that: it always sets observation levels for detainees under the influence of alcohol and/or drugs appropriately, and that they remain in place long enough	Supt CJD	Custody officers have been reminded that they are to conduct the check together with the Detention Officer that reduces the checks from rousals to Level 1 or level ½ and record their rational and observations. During inspection HMICFRS commented that Level 3 and Level 4 watches are conducted appropriately but details of briefings and the identity of officers involved is not always recorded as per APP Guidance. Staff are given a recording sheet and briefed on the risks the individual poses. This briefing will then be recorded on the EDL.
4.3	The force should improve its approach to risk by making sure that: the same staff member conducts detainee checks	Supt CJD	Two Detention Officers are allocated to cell checks to provide consistency.
4.4	The force should improve its approach to risk by making sure that: custody staff don't routinely remove cords and footwear from detainees without an individual risk assessment;	Supt CJD	The Criminal Justice Inspectors will be reviewing the policy relating to removing of cords from detainees.
4.5	The force should improve its approach to risk by making sure that: information provided during handovers between shifts is shared between all custody staff, and those taking over promptly visit and engage with the detainees in their care;	Supt CJD	Handovers between Custody Sergeants are captured on CCTV and the EDL. Difficulties arise due to conflicting shift patterns between custody staff.
4.6	The force should improve its approach to risk by making sure that: all custody staff carry anti-ligature knives	Supt CJD	All staff have ligature knives and have been reminded to wear them. Ongoing observations have shown that staff are continuing to wear ligature knives.
4.7	The force should improve its approach to risk by making sure that:	Supt CJD	Staff have been reminded to retain their allocated keys.

Ref	HMICFRS	Owner	Progress
	Custody staff maintain control of cell keys.		Ongoing observations show the practice of passing keys between staff has stopped but will continue to be monitored
5.1	Reviews of detention should be conducted in the interests of the detainee. If conducted early, the reasons should be clearly recorded	Supt CJD	All Superintendents now have the correct level of Unifi access to allow them to update Unifi directly with Superintendent reviews. The access includes the following: • Urgent Interview – no solicitor. • Supt. Extension of Bail. • Supt. Extension of detention. – warrant of further detention. • Removal of solicitor. (if not available – can be delegated to Inspector,) • Denial of solicitor before entry to custody if felt unsuitable – can then contact solicitors firms. • Training offered to all Superintendents'. The PACE Inspector course provision for delivery to new Inspectors in September 22 is being reviewed by L&D Custody Trainers.
6.1	The force should make sure it: provides a clean environment for detainees, monitors the daily cleaning regime and introduces a regular programme for deep cleaning	Supt CJD	Engagement with Estates and cleaning contractors is in place. The issue has been identified as being associated with food stains on flooring, which due to the type of flooring cannot be removed / cleaned and looks similar to a dried blood stain. In addition the toilet cleaner used is staining the toilets.
6.2	The force should make sure it: addresses the safety issues involving potential ligature points and, where resources don't allow the force to deal with them immediately, manages the risks to ensure it provides custody safely	Supt CJD	Regular H&S checks are carried out in custody, if any concerns are escalated the cell is immediately closed until repairs are completed.

Ref	HMICFRS	Owner	Progress
6.3	The force should make sure it: prominently displays sufficient notices advising that CCTV is in operation throughout the suite	Supt CJD	Detainees are informed of the existence of CCTV when they are booked in. They are reminded that CCTV in the toilet areas are pixelated. The Criminal Justice Inspectors will review signage throughout custody and consider improvements.
6.4	The force should make sure it: Brief and train all custody staff in the procedures they should follow in the event of a fire or other emergency requiring the custody suite to be evacuated, as per APP guidance.	Supt CJD	A bespoke Fire Warden course and Fire Warden role has been developed for delivery to custody staff. Table-top exercises were completed in order to develop the bespoke fire warden role. A fire evacuation test is scheduled to be completed.
7.1	The force should improve the care of detainees by making sure detainees are routinely: offered the opportunity to shower/wash	Supt CJD	This has been included in the ongoing professional development for Staff and the courses run in conjunction with L&D.
7.2	The force should improve the care of detainees by making sure detainees are routinely: offered access to the exercise area	Supt CJD	This has been included in the ongoing professional development for Staff and the courses run in conjunction with L&D.
7.3	The force should improve the care of detainees by making sure detainees are routinely: provided with replacement footwear:	Supt CJD	Criminal Justice Inspectors will be reviewing this a wider part of the exercise regarding individual risk assessments.
7.4	The force should improve the care of detainees by making sure detainees are routinely: provided with toilet paper	Supt CJD	Toilet paper is available on request. Criminal Justice Inspectors will be reviewing this a wider part of the exercise relating to individual risk assessments.
7.5	The force should improve the care of detainees by making sure detainees are routinely:	Supt CJD	The Criminal Justice Inspectors are reviewing current reading materials available and considering what else could be provided to distract detainees and relieve boredom whilst

Ref	HMICFRS	Owner	Progress
	provided with reading materials and other distraction activities		in custody. Materials to be suitable for all age groups including learning disabilities and autism.
7.6	The force should improve the care of detainees by making sure detainees are routinely: Provided with pillows and mattresses that are in a good condition and offer sufficient comfort	Supt CJD	An audit of mattresses and pillows has been conducted. The old or damaged ones disposed of and new ones placed in cells.
8.1	The force should strengthen its approach to appropriate adults by: making sure all children and vulnerable adults in custody are promptly supported by an Appropriate Adult (AA)	Supt CJD	The Force has engaged with Gloucestershire County Council, who are responsible for the current contract, regarding provision of AA services and difficulties around obtaining an AA after 10pm and overnight. This will be considered as part of next contract renewal.
8.2	The force should strengthen its approach to appropriate adults by: Collecting and monitoring information to show how long children and vulnerable adults wait before an AA arrives, to assess how well it is meeting their needs	Supt CJD	The Criminal Justice Inspectors monitor the Electronic Detention Logs (EDL) and timeliness of calling AA's as part of their audits.
9.1	The force should continue to work with the relevant local authorities to improve the provision of alternative accommodation for children who are charged and refused bail.	Supt CJD	The protocol was submitted to the Children and Families Overview Scrutiny Group on the 26/05/22. There are continuing issues with availability of PACE accommodation for young people but this is anticipated to improve. The Force captures request to evidence compliance with legislation.
10.1	The force should make sure: it offers support leaflets to all detainees on release	Supt CJD	Vulnerable detainees are identified via risk assessment from a number of agencies in custody (HCP L&D staff CGL youth support all in custody). The Force uses an exit plan leaflet. A minimum expectation is that an exit plan leaflet will be given to ALL detainees on exiting the block.

Ref	HMICFRS	Owner	Progress
			The Criminal Justice Inspectors will review this as a part of their audit process.
10.2	The force should make sure: custody officers check all digital person escort records (dPERs) are fully completed and sign them off when detainees are transferred	Supt CJD	This is subject to electronic processes relating to improved data quality. An audit trail has now started with electronic PER's. The Criminal Justice Inspectors will review and monitor compliance through liaison with SERCO (Pecs contractor).
10.3	The force should make sure: when detainees are transferred to court or prison, custody officers speak to them to identify and mitigate risks before they leave police custody	Supt CJD	Vulnerable detainees are identified via risk assessment (HCP L&D staff CGL youth support all in custody). Custody Officers handover to SERCO staff at a counter were risks are identified and captured on CCTV. The Criminal Justice Inspectors will review this as a part of their audit process

Ends/.