



Paul Trott
Chief Executive
Office of the PCC for Gloucestershire

5 May 2017

Dear Paul

Comments on the PEEL Effectiveness Inspection – s.55 Police and Crime Act 1996 request

Further to your invitation in your email of 19 April 2017, I would like to take the opportunity to make the following comments on the above report.

In general I am disappointed that we have been graded as 'requires improvement' for preventing crime and tackling anti-social behaviour and keeping people safe; and 'inadequate' for tackling serious and organised crime. While of course I accept that there is always more to do, and some things that we can (and are) doing differently, my overriding belief is that our performance has not deteriorated over the last 12 months and the grading is not properly reflective of what we do, or the positive comments within the report.

I consider that the progress we have made, which is recognised by many positive comments within the report, and the outcomes that the Constabulary has achieved for the communities of Gloucestershire should have been given greater weight in the considerations.

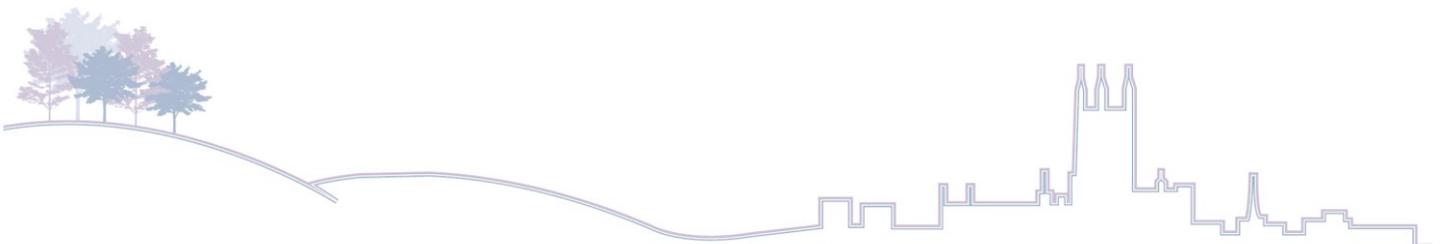
Preventing Crime, Tackling Anti-social Behaviour and Keeping People Safe

As the report reflects, we have achieved reductions in overall crime (0.4% where the national average is an increase of 7.6%, a 17.6% reduction in crime where fraud is excluded and a 16.3% reduction in victim based crime).

As the introduction of the report says, this is a principal measure of effectiveness and crime prevention more effective than investigation. These figures are supported by the Crime Survey of England and Wales.

Improvement in levels of satisfaction and confidence have been significant as a result of our programme of work 'Serving our Communities', moving our national position from 39th to 8th with statistically significant results demonstrating positive engagement and service delivery.

The absence of an overarching strategic assessment does not appear to have hampered either empirical results. The satisfaction data indicates better, more engaged service delivery which in turn promotes confidence.





HMIC recognise the range of engagement tools used with communities and the positive problem solving outcomes, whilst at the same time piloting asset-based community development. I interpret the AFI that we should adopt a structured and consistent problem solving process as discouraging development and creativity – this is not in the best interests of the public we will however revisit our thinking on this as we refine our neighbourhood offer (work currently underway).

HMIC also recognise the extent of our approach and tactics to tackle crime and anti-social behaviour together with partners be it 'Great Expectations' or anti-social behaviour initiatives. As you say they found "*good examples of problem solving and preventative tactics as part of local officers' daily lives*". All our PCSO's are crime prevention trained and 94% spend 70% of their time out on patrol.

The above, together with the positive comments in respect of best practice and our commitment to continuous improvement does not represent, I believe, performance that has deteriorated from last year.

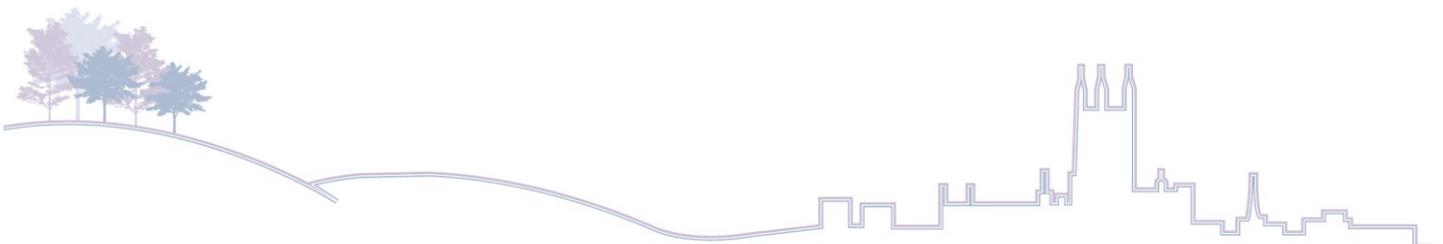
That said, I have a strong commitment to ensuring that the Constabulary maintains effective neighbourhood policing at the heart of our service to our communities. Since the publication of the report, we have put significant effort into developing a new Neighbourhood Policing Approach, supported by a partnerships review, which will see dedicated Neighbourhood Policing Teams more focused towards preventing harm, vulnerability, and fear of crime, and reduce demand for policing through earlier and improved intervention. We are progressing plans to increase the recruitment of Special Constabulary and volunteers who will continue to add tremendous value (and capacity) to our efforts.

Tackling Serious and Organised Crime

I do not see the evidence in the report that justifies that our position has deteriorated and that we are inadequate and the Constabulary has made this challenge to HMIC. The Office of the Surveillance Commissioner (OSC) most recent force inspection, contrary to HMIC's judgement, states "*As mentioned in previous reports the Force has invested heavily in its proactive capability. It's covert capability, level two crime investigation structures and proactive units are equal in terms of size and sophistication if not in the numbers of staff available) to forces that are twice the size of Gloucestershire Constabulary*". The recent well publicised of Operation Emperor provides one example around success in this area.

Over the last year, despite the financial challenges, we have invested significantly in increasing our analytical capability and capacity with both additional staffing (including a new Head of Analysis) and new analytical tools (SAS visual analytics). I am confident that this will enable us to continue to develop our insight over the coming months.

This additional capacity has already enabled the Constabulary to introduce and now use the best practice of 'Management of Risk in Law Enforcement' (MORILE) to





understand better vulnerability within the county. Through this process the force has revised its operational priorities to focus on modern slavery, human trafficking, sextortion, child sexual abuse (including child sexual exploitation) and dangerous drug networks. These are clear and communicated through a variety of forums.

Gloucestershire has also engaged fully with the Regional and Organised Crime Unit (ROCU) to support the regional Strategic Assessment. This has included providing all relevant Force intelligence across the six National/Regional Control Strategy Area:

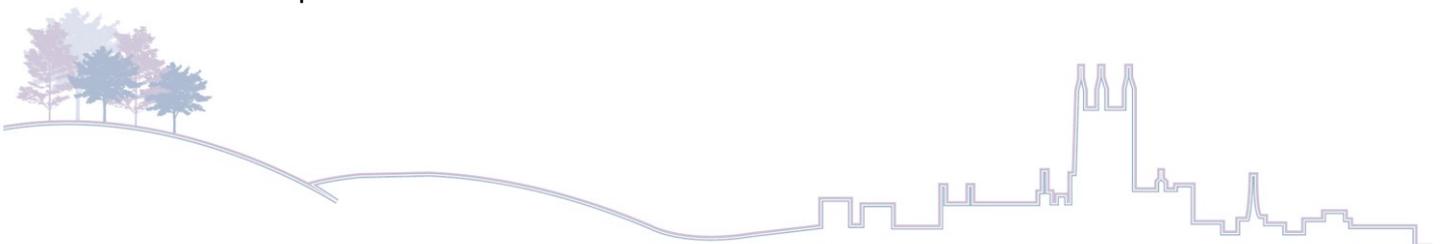
- Organised crime mapping
- Child sexual exploitation (profile completed)
- Cyber crime (arguably a national leader)
- Modern slavery (profile completed)
- Dangerous Drug networks/county lines
- Foreign National offender be it compliance with checks or supporting Operation Trivium (for which we provided the national Gold lead).

While our understanding of threat was not consolidated into a single snapshot at the time of the inspection, we have sound and developing processes for identifying our threat areas and, subsequently, tasking and coordinating relevant activity. The Constabulary delivers on each of these areas and in each again draws positive comment within the report.

Our relationship with the Counter-Terrorism Intelligence Unit (Zephyr) is now well developed and we properly comply with Organised Crime Group (OCG) Management. I do not consider that the low number of identified OCG's amounts to a lack of understanding of our threats. Four of the five forces in the South West Region are in the 'bottom' five of the HMIC table. The number of groups does not necessarily equate to quality of management or positive outcomes for our communities.

With regard to the specific points raised by the Policing Minister regarding information-sharing with partners; the Constabulary already has a number of mechanisms for sharing information at an operational and strategic level with partner agencies. This includes the now well-established Multi-Agency Safeguarding Hub (MASH). We have a dedicated Hate Crime coordinator who is working closely with wider organisations such as Victim Support and Crime Stoppers to ensure that reports through third party organisations inform our understanding of local need for the further development of our services. A county wide stalking clinic launched last month is due to go live (on a trial basis) in late Summer and relies heavily on multi-agency cooperation.

As you will be aware, we are working closely with your office to progress the outcomes of the Gloucestershire Community Safety Review to establish an effective multi-agency forum to better share information and reduce the risk of harm from serious and organised crime. In this we have engaged with the Home Office 'Tackling Serious and Organised Crime Frontline' team for best practice and advice.





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Of course the process of inspection always provides us with an opportunity to consider the areas in which we can improve our service to communities and we take the findings seriously. The Constabulary has developed action plans to address all of the HMIC recommendations which are reviewed on a quarterly basis through the Strategic Monitoring Board which is Chaired by the Deputy Chief Constable. We engage with HMIC representatives regularly to ensure that we are on track to secure the necessary improvements.

In the meantime I want us to continue to embrace all forms of feedback and be a transparent and self-reflecting organisation.

Yours sincerely

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Chief Constable
Gloucestershire Constabulary

