



Mr. Paul Trott  
Chief Executive  
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Commissioner for Gloucestershire

Our Ref: JS-jms/Trott HMICFRS  
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Date: 28 June 2019

Dear Paul,

**Re: Response Gloucestershire Constabulary's effectiveness, efficiency and legitimacy 2018/19 report**

This letter is submitted on behalf of the Constabulary to assist with the requirements stipulated in Section 55(1) of the Police Act 1996.

I believe that the report provides a fair and accurate picture at the time of the inspection. I was pleased with the content of the report together with the inclusion of the statement made by HMI Williams in which she commended Gloucestershire Constabulary for the progress made over the past year.

I would draw your attention to the fact that there were no recommendations arising from this inspection. Therefore, we have focused the content of this letter on the activity and progress we have made against the "Areas for Improvement" identified by HMICFRS.

**Effectiveness - Areas for Improvement**

**(AFI) Investigating crime**

- 1. The force should ensure regular and active supervision of the quality and progress of investigations. This supervision should be properly recorded.**

The Force is committed to Operation Springclean, which is our major approach to improving our performance in relation to criminal investigation, crime reduction and victim satisfaction. It is using Supportive Leadership and Wellbeing as the founding principles. There are also a number of initiatives which have been launched over the spring of 2019 to improve the way we manage and optimise operational performance.

Supervisors have recently received master-classes to equip them so they are able to better manage investigations, file quality, bail management, biometric compliance and released under investigation processes. A network of 17 Disclosure Champions has been established. They are receiving initial training on the 20<sup>th</sup> May 2019. Once trained, these champions will act as subject matter experts and offer disclosure advice to operational officers.

Alongside Operation Springclean we are undertaking a year of standards campaign. The campaign demonstrates that there is 'The Gloucestershire Constabulary Standard' that runs through the service we provide to the public, to our partners and to colleagues. That Standard can be summed up as 'pride and care'.



Within the six strands are programmes of work across a range of areas (outlined below) in relation to raising standards across all investigations, from initial contact to court disposal. By the end of May all leaders of Sergeant and above will have received an input on the below.

- Crime Data Integrity
- Professional Quality and Proportionate Investigations
- Victims Code Compliance
- File Quality
- Data Accuracy
- Supportive Leadership

### The Gloucestershire Constabulary Standard – pride and care in all we do

#### Quality of service

We deliver our services efficiently and effectively to keep people safe from harm, inspiring trust and confidence to help us reduce crime and disorder.

#### Victim contact

We put victims at the heart of all we do, taking pride in keeping people informed and updated.

#### Estate/Fleet

We take pride in our buildings and vehicles, making sure they reflect our high professional standards.

#### Appearance

We take professional pride in our uniforms and office wear, making sure they reflect the Constabulary's high standards and dress code policy.

#### Quality of our work

We take pride and care in the way we obtain and record information on our systems. We ensure it's of a high standard, accurate and reliable.

#### People

We help all who work for us to learn and develop, making full use of their potential and skills. We celebrate the good work of staff, encouraging high standards and continuous improvement.



## Protecting vulnerable people

2. **The force should ensure that the capability and capacity of the MASH enables it to process referrals promptly and effectively; it should ensure this approach is sustainable for the long-term.**

Prior to the PEEL inspection we had already identified that the MASH was under resourced and the challenges this posed in delivering an effective safeguarding service for child protection and domestic abuse. Plans had been submitted to address this and the updated position is as follows.



### **Safeguarding Referrals**

In December 2018 there was a backlog of 1000 low and medium risk referrals which had not been processed, albeit all had been risk assessed to identify urgent issues. A number of temporary staff were recruited and following training they were deployed to the MASH in January 2019. The backlog has now been reduced to 575 outstanding referrals.

Whilst the numbers have reduced there have been difficulties in recruiting and retaining temporary staff, impacting upon the ability to consistently manage the demand volumes. A staffing growth bid for the MASH was prioritised for the 2019 precept funding bid and was agreed. The funding has enabled us to recruit permanent staff. Recruitment of these staff has been prioritised and is currently in progress, with the temporary staff remaining in the interim.

### **Domestic Abuse**

During the inspection it was identified that our performance in managing the Domestic Violence Disclosure Scheme required some improvement. In response the Domestic Abuse Safeguarding Team (DAST) were re-located to the MASH working alongside partners to increase efficiency. This has had an immediate positive impact, with outstanding volumes reducing by half by February 2019. Unfortunately, due to the subsequent occurrence of staff vacancies in the DAST this demand backlog has increased, albeit still lower than levels seen at the time of Inspection. Recruitment of these vacancies has been prioritised and the additional staff combined with additional MASH resources will be able to address these issues.

### **Performance Management**

A robust performance management framework is in place within the Public Protection Unit. The MASH figures are reviewed each week, with a detailed overview provided at the monthly performance senior leaders team meeting.

### **Tackling serious and organised crime (SOC)**

- 3. The force should further develop its serious and organised crime local profile to enhance its understanding of the threat posed by this criminality and to inform activity with partner organisations to reduce the threat.**

This AFI is included in our SOC Continuous Improvement Plan. The SOC Local Profile has been worked on with support from partner agencies. HMICFRS were present during the workshop that took place with partners to develop contributions, however it is accepted that the report reflects findings at the date and time of the inspection.

We are confident that this AFI has already been met and we are confident that an improved rating will be achieved at the next SOC inspection.



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- 4. The force should ensure that lead responsible officers maintain up-to-date management plans for all active organised crime groups (OCGs) as part of a long-term, multi-agency approach to dismantling these groups, taking a balanced approach across the '4P' framework and should have a consistently good knowledge of available tactics.**

This AFI is included in our SOC Continuous Improvement Plan. Lead Responsible Officer (LRO) training took place last year; HMICFRS were present during this, however it is accepted that the report reflects findings as at the date of inspection.

Further LRO training is taking place during 2019 with other regional forces requesting to attend as our training process is seen as best practice. We are confident that OCG management is robust with "4P" plans in place. Therefore, we are confident that this AFI has been met.

#### **Legitimacy - Areas for improvement**

- 1. The force should ensure all officers and staff have at least the lowest level of vetting clearance for their roles and clear any backlogs, so it complies fully with the national vetting guidelines.**

Lapsed vetting for staff continues to be addressed. The number of lapsed figures continues to reduce with 216 employees being required to renew their clearance as at the end of April. This has reduced from 354 at the same time last year.

We have taken steps to improve the resourcing in vetting, with an additional administrator post into the unit, who is now starting to assist by relieving the administrative burden on the analysts and allowing them more time to work on cases.

Since the inspection, we have also put in place through The People Development Board (PDB) an updated designated post list to ensure that officers and staff are only cleared to the level commensurate to their role. We will not be conducting NSVS clearance for officers/staff that do not need this level of clearance. This more proportionate approach will assist in reducing time for vetting analysts and therefore create additional time for the backlog of lapsed vetted staff to be addressed.

- 2. The force should monitor its vetting decisions to identify disparities and disproportionality (e.g. BAME groups) and act to reduce them where appropriate.**

Decisions on vetting clearances are based on meeting the requisite criteria. On average 5% of applications per year do not pass the requisite criteria for vetting clearance. Our vetting form, which is based on the national template, does not ask for any declaration of ethnicity on completion, therefore being able to identify any disproportionality at the point of vetting is not possible. Vetting applications are distributed and processed by a team consisting of 6 (fte) members of staff, and one Vetting Manager, all of whom make decisions on applications received.

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### 3. The force should ensure its counter-corruption unit (ACU):

- **has enough capability and capacity to counter corruption effectively and proactively;**

The ACU is staffed by a Detective Inspector, Detective Sergeant, three Detective Constables, and a Police Staff Analyst and Researcher. We feel that this is sufficient capacity to react to information provided to the ACU and also proactively address corruption concerns.

Clearly an increase in staff would enable the ACU to be even more proactive, but this needs to be balanced with the other demands on the Force and commensurate to levels of staff in other areas across the organisation but also commensurate to the Force's counter corruption strategic threat assessment and the areas of concern and vulnerability identified in that document.

In terms of capability the ACU is concentrating on obtaining software to assist them but also is careful to recruit staff based on their particular skill set to complement the skills in the department. An example of this is the recent advert for a new member of staff with specified digital investigation skills as a desirable candidate. The current ACU staff have financial investigation expertise, public protection expertise and covert policing expertise, all of which are essential to retain in the unit to enhance capability.

- **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.**

ACU remain in the process of testing software available and have visited other Forces to see products in action and will commence a procurement process for software when the right product is identified. ICT have a project lead for this work and they are working closely with ACU.

#### **Efficiency - Areas for improvement**

None identified in report.

Yours sincerely



**Jon Stratford**  
**Deputy Chief Constable**

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