# APPENDIX 1

# HMICFRS IPA causes of concern, **recommendations and areas for improvement**

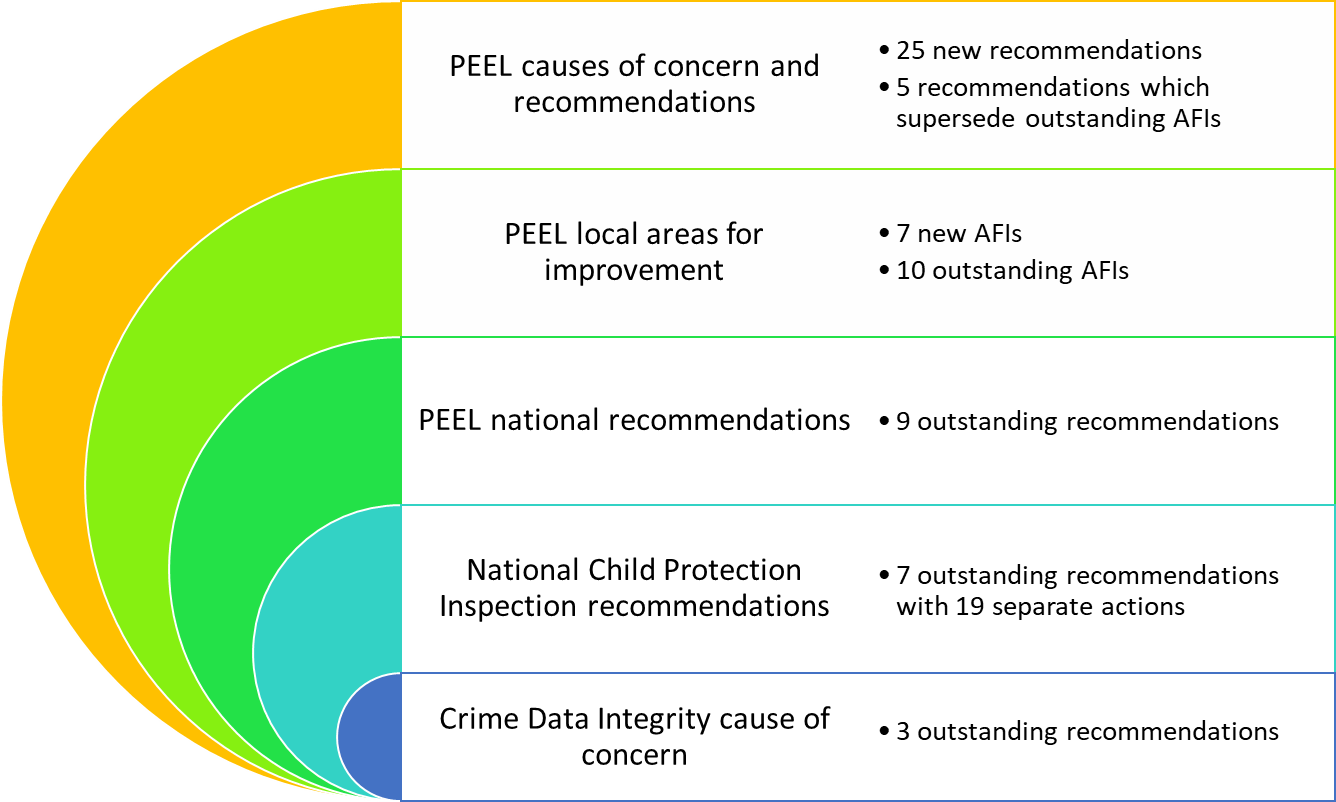
During the 2019 IPA (PEEL) inspection, HMICFRS identified **6 causes of concern** which have resulted in us being issued with **30 recommendations**. Where a recommendation relates to an existing AFI, this has been superseded and incorporated into the cause of concern.

We have also been given **7 new** **areas for improvement** and have a further **10** which **remain outstanding** from previous inspections, giving us a **total of 17**.

In addition, we also have **9 national PEEL recommendations** to deliver on that relate to a national cause of concern for ‘all forces’.

This gives us a total of **56 individual elements of service improvement** to deliver relating to the IPA inspection.

Furthermore, we also have **7 outstanding NCPI recommendations**, which are closely linked with PEEL and a **cause of concern** relating to **Crime Data Integrity** with **3 recommendations**.



## **Cause of Concern:** Prevention

The force doesn’t appropriately prioritise crime prevention. There is a lack of strategic direction, and the force doesn’t allocate enough resources to prevention work. Staff who carry out prevention work lack an understanding of the priorities they should be tackling.

The force should take immediate steps to:

* Provide strategic direction and co-ordination of all prevention activity (547);
* Ensure there are the right resources, in the right place, to carry out structured problem-solving and prevention activity aligned to its priorities (548);
* Ensure officers and staff working within neighbourhood teams understand the needs of local communities, their priorities, and the threats they face (549); and
* Monitor the effectiveness of its crime prevention activity, evaluating and sharing effective practice both internally and with other organisations (550).

## **Cause of Concern:** Protecting vulnerable people

Cleveland Police is failing to respond appropriately to vulnerable people, including children. It is missing opportunities to safeguard them and is exposing them to risk.

The force must take immediate action to ensure that:

* Officers and staff can identify vulnerable people and repeat victims effectively (551);
* It promptly attends incidents involving vulnerable people. Any regrading of incidents is based on a structured and recorded risk assessment with supervisory oversight (552);
* It safeguards all victims of domestic abuse , through the effective completion of a structured risk assessment, adequately supervising any changes to the initial assessment (553);
* There is sufficient supervision of domestic abuse cases assessed as having a standard level of risk (554);
* The cumulative effect of numerous incidents involving the same victim or household is properly risk assessed, considered and responded to (555);
* Referrals for ongoing safeguarding is made at the appropriate time (556);
* There are effective processes in place for catching criminals which are subject to supervision and scrutiny and it uses the available legal powers to prevent re-offending (557); and
* It supplies people with the information they need and are entitled to under the provisions of Clare’s Law and Sarah’s Law (558).

## **Cause of Concern:** Understanding demand and strategic planning

Cleveland Police doesn’t adequately understand the demand it faces. A thorough understanding of demand is required to underpin all strategic planning. This failure means it doesn’t have coherent workforce and financial plans to meet demand a deliver the necessary outcomes.

To address this cause of concern, the force should immediately:

* Carry out a comprehensive assessment of current and potential future demand across all operational areas to inform the force’s operating model. This should include latent demand, and the demand generated by internal processes (533);
* Provide senior leaders with the relevant information, support and skills to inform their understanding of demand (534); and
* Develop coordinated financial and workforce plans based on demand, which should be integrated into the force's strategic planning cycle (535).

## **Cause of Concern:** Public engagement, communication and scrutiny

Cleveland Police doesn’t adequately engage with local communities. This lack of engagement means that public expectations don’t sufficiently influence force priorities and changes to the services it provides. The public also has a limited role in scrutinising the force and helping it to improve.

The force should immediately take steps to:

* Improve its communication and engagement with the public of Cleveland. This should include: informing them of changes to policing services; communicating the action it has taken to address force priorities and the provision of community and personal safety advice (536);
* Improve its understanding of local communities, including those who are less likely to complain or those that engage less with the police (537);
* Understand what services its communities want and how the force's plans and its operating model reflect these expectations (538); and
* Engage the public in the scrutiny of its data and processes including the use of force and stop and search, to help it improve. This may be through an independent advisory group or other means. It should ensure these people, have the relevant training, and are provided with sufficient data and analysis for them to scrutinise and challenge in a constructive way (539).

## **Cause of Concern:** Ethical behaviour and culture

Many senior leaders (superintending and chief officer ranks, and senior police staff managers) aren’t consistently ethical behaviour. The inappropriate behaviour of senior leaders within Cleveland Police is so profound that it is affecting the efficiency and effectiveness of the force.

The force should take immediate action to:

* Embed the Code of Ethics principles and behaviours within the organisation (559);
* Create a culture where officers and staff are honest and take responsibility for their work and action taken (560);
* Hold the entire workforce to account for inappropriate behaviour and poor performance (561); and
* Ensure there is a process for the workforce to discuss ethical dilemmas regularly, and understand decisions made by the force about fairness that also influence policy and practice (562).

## **Cause of Concern:** Workforce engagement and communication/ treating the workforce fairly

Cleveland Police does not consistently treat its workforce with fairness and respect*.* It does not effectively communicate with or engage its workforce, its processes are not perceived to be fair and it doesn’t understand its workforce well enough to support them.

To address this cause of concern, the force should:

* Communicate with the workforce, so they have a clear understanding of what is happening in the force (540);
* Involve the workforce in decision making; listening to their feedback, acting on it, and communicating action taken (541);
* Improve the timeliness of its grievance handling processes (542);
* Understand the risks and threats to the wellbeing of its workforce and use this to inform the actions it takes (543);
* Understand the performance of its workforce, support their development, and deal with poor performance fairly and consistently (544);
* Fairly and consistently identify those with the potential to become senior leaders and support them to gain the skills for future leadership roles (545); and
* Ensure that promotion processes are transparent, fair and perceived as such by the workforce (546).

**Local areas for improvement (force specific)**

**Q1 Prevention**

* No AFIs

**Q2 Investigation**

* The force should improve how it allocates crime, ensuring it allocates investigations to appropriately trained and supported officers, and that it reviews this allocation throughout the investigation. (563 - IPA 2019)
* The force should ensure that all investigations are completed to a consistently good standard and in a timely manner. (564 - IPA 2019)
* The force should ensure that staff with the right skills are investigating crimes thoroughly, leading to satisfactory outcomes for victims. It should review its provision of investigative training, development and guidance. (565 - IPA 2019)
* The force should consider widening the approach to IOM to maximise the forces impact on reducing threat, harm and risk, and there should be clear measures of success about how effective it is. (449- Effectiveness 2017)

**Q3 Protecting vulnerable people**

* All children managed within VEMT should have a person dossier and a trigger plan in place with appropriate supervisory oversight. (566 - IPA 2019)
* The force should further improve the way it works with partner organisations in relation to sharing information and safeguarding victims by continuing to work to establish a multi-agency safeguarding hub (for the south of the force area). (355 - Vulnerability 2015)
* The force should ensure that the risks posed by registered sex offenders are managed effectively. (450 - Vulnerability 2016)
* The force should take steps to understand the reasons why a high proportion of crimes related to domestic abuse fall into the category ‘Evidential difficulties; victim does not support police action’, and rectify this to ensure that it is pursuing justice on behalf of victims of domestic abuse. (455 - Vulnerability 2016)

**Q4 Serious and organised crime**

* The force needs to develop a better understanding of the effect of its activity on serious and organised crime across the four Ps, and make sure it learns from experience to maximise its disruptive effect. (567 - IPA 2019)

**Q6 Meeting current demand**

* The force should undertake appropriate activities to fully understand its workforce’s capabilities, in order to identify any gaps and put plans in place to address them. This will enable the force to be confident in its ability to be efficient in meeting current and likely future demand. (472 - Efficiency 2017)
* The force should conduct a leadership skills audit that will allow it to understand leadership capacity and capability. (473 - Efficiency 2017)

**Q8 Treating the public fairly**

* The force should continue with the improvements it has started to ensure that all stop and search records include sufficient reasonable grounds to justify the lawful use of the power, and that officers fully understand the grounds required to stop and search a person. (358 - Legitimacy 2015)

**Q9 Ethical workforce behaviour**

* The force should improve the way corruption intelligence is assessed, graded and stored. (444 - Legitimacy 2016)
* The force should review the capacity and capability of its counter-corruption unit, to ensure it can manage its work effectively. (443 - Legitimacy 2016)
* The force should ensure that it complies with IPCC statutory guidance for keeping complainants informed at all stages of the complaints process. (487 - Legitimacy 2017)
* The force should monitor its vetting decisions to identify disparities and disproportionality (e.g. black, Asian and minority ethnic groups), and act to reduce them where appropriate. (468 - IPA 2019)
* The force should ensure it has full information technology (IT) monitoring to effectively protect the information contained within its systems. (569 - IPA 2019)

**National recommendations (for all forces)**

**Q1 Prevention**

* **By October 2018**, all forces should review their own approach to neighbourhood policing to check whether the service they provide to local communities meets the College of Policing neighbourhood policing guidelines. As soon as possible, they should make any changes they need to implement the guidelines. (502 - Effectiveness 2017)

**Q2 Investigation**

* To review current procedures for apprehending wanted suspects, assess the number of wanted suspects on the PNC and those whose details have yet to be circulated on the PNC, and take prompt and effective action to apprehend those suspects. (459 - Effectiveness 2016)
* **By September 2018**, all forces should review how they are implementing changes to pre-charge police bail, working with the National Police Chiefs’ Council lead. The review should include an assessment of how far vulnerable people are being affected by these changes. As soon as possible, forces should then put into effect any necessary changes to make sure they are using bail effectively, and in particular that vulnerable victims get the protection that bail conditions can give them. (504 - Effectiveness 2017)
* **By September 2018**, all forces with a shortage in qualified detectives and/or other investigators should develop an action plan. The plan should set out in detail what the force will do to address the shortage in the short, medium and long term. It should be in line with the national plan to develop investigative capacity and capability that all chief constables in England and Wales have agreed. This plan should draw on the information in the force management statement about;
  + The investigative demand the force expects to face in the next four years; and
  + How the force will change and improve the condition, capacity, capability, serviceability, performance and security of supply of its workforce and other assets to cope with that demand. (503 - Effectiveness 2017)

**Q3 Protecting Vulnerable People**

* **By April 2018,** every police force in England and Wales should update its domestic abuse action plan, determine what more it can do to address the areas for further improvement highlighted in this report and specified below, and publish its revised action plan accordingly. (505 - Effectiveness 2017)
  + **Recording**. There is considerable variation between forces in the proportion of recorded crime identified as relating to domestic abuse. Forces need to ensure that domestic abuse crime including coercive control is being correctly identified and recorded.
  + **Assessing and responding to risk**. Forces should ensure arrangements for assessing and managing risk are well understood by officers and staff, especially at initial point of contact, and decision making about the grading of, and attendance at, domestic abuse incidents is supervised effectively.
  + **Positive and preventative action**. Nationally, arrest rates for domestic abuse are falling, with large variations across forces. There are considerable variations in the use of preventative measures. Forces need monitoring processes, supported by accurate data, to ensure that they are taking positive action such as arrest, and are making effective use of powers, for example Domestic Violence Protection Orders and the Domestic Violence Disclosure Scheme. Where orders or bail conditions are breached, forces need to ensure that there are appropriately robust processes in place to take action.
  + **Building the investigative case**. Forces need to ensure that there are clear standards and expectations, with effective supervision, for building the best possible case for the victims of domestic abuse whether victims support police action or not.
  + **CPS referrals and prosecutions**. Nationally, referrals and charge rates are falling. Forces need to monitor the data and work closely with the CPS to understand whether improvement is required, and, if so, to effect change.
  + Chief Officers in each police force should continue to oversee and ensure full implementation of these action plans **and offer regular feedback on progress to their PCC's**. This should be a personal responsibility of the CC in each case. The leadership task for the service now is to sustain the level of determination and commitment seen since the publication of 'Everyone's business' to ensure that the police response to victims of domestic abuse continues to improve. HMICFRS will continue to monitor progress against force action plans as part of their PEEL inspection regime.

**Q8 Treating the public fairly**

* **By July 2018**, all police forces should be regularly and frequently monitoring a comprehensive set of data and information on use of stop and search powers to understand disproportionality, identify disparities and publish the analysis. (489 - Legitimacy 2017)

**Q9 Ethical Behaviour**

* Force should review complaints and misconduct arrangements to assess whether or not there is any bias in the way decisions regarding the management of complaints are made and take action to remove it. (361 - Legitimacy 2015)
* Within six months, all forces should have started to implement a plan to achieve the capability and capacity required to seek intelligence on potential abuse of authority for sexual gain. These plans should include consideration of the technology and resources required to monitor IT systems actively and to build relationships with the individuals and organisations that support vulnerable people. (448 - Legitimacy 2016)

**Q10 Treating the workforce fairly**

* Forces need to improve their use of (people) performance and development processes, in line with College of Policing guidance. This should form part of the ability of forces to understand the leadership skills and capabilities in the workforce. It also has wider implications for forces’ abilities to succession plan effectively using targeted leadership development, and to make sure that wellbeing provisions are communicated effectively to all ranks and grades within the workforce. (498 - Leadership 2017)

**Recommendations from the National Child Protection Inspection (force specific)**

The National Child Protection Inspection took place in 2017 with a further revisit in 2018.

* Cleveland Police should review its processes to ensure that its staff can draw together all available information from police systems in order better to inform their responses and risk assessments (463); and
* Cleveland Police should ensure that its officers always record their observations of a child’s behaviour and demeanour in records of domestic abuse incidents so that better assessments of a child’s needs are made (464).
* Cleveland Police should **immediately** undertake a review, together with children’s social care services and other relevant organisations, to ensure that the force is fulfilling its statutory responsibilities as set out in Working Together to Safeguard Children. As a minimum, this should include:
  + The assessment of risk, how information is shared and the development of joint protective plans; and
  + Recording on police systems decisions reached at meetings to ensure that staff are aware of all relevant developments (461)
* Cleveland Police should **immediately** improve practice in cases of children who go missing from home. As a minimum, this should include:
  + Improving staff awareness of their responsibilities for protecting children who are reported missing from home and, in particular, those cases where it is a regular occurrence;
  + Improving staff awareness of the links between children going missing from home and the risk of sexual exploitation;
  + Improving staff awareness of the significance of drawing together all available information from police systems, including information about people who pose a risk to children, better to inform risk assessments;
  + Ensuring that staff are aware of the need to pass this information from police systems, including information about people who pose a risk to children, on to other agencies; and
  + Identifying the range of responses and actions that the police can contribute to multi-agency plans for protecting children in these cases (462).
* **Within three months**, Cleveland Police should improve its child sexual exploitation investigations, paying particular attention to:
  + Improving staff awareness, knowledge and skills in this area of work;
  + Ensuring a prompt response to any concern raised;
  + Undertaking risk assessments that consider the totality of a child's circumstances and risks to other children; and
  + Improving the oversight and management of cases (to include auditing of child abuse and exploitation investigations to ensure that standards are being met) (465).
* **Within three months**, Cleveland Police should take steps to ensure that all relevant information is properly recorded and is readily accessible in all cases where there are concerns about the welfare of children. Guidance to staff should include:
  + What information should be recorded (and in what form) on systems to enable good quality decisions;
  + The importance of sending the information to the correct police department and/or relevant partner agency; and
  + The importance of ensuring that records are made promptly and kept up to date (466)
* **Within three months**, Cleveland Police should undertake a review (jointly with children’s social care services and other relevant agencies) of how it manages the detention of children. This review should include, as a minimum, how best to:
  + Ensure that all children are only detained when absolutely necessary and for the absolute minimum amount of time;
  + Assess, at an early stage, the need for alternative accommodation (secure or otherwise) and work with children’s social care services to achieve the best option for the child;
  + Ensure that custody staff comply with their statutory duties to complete detention certificates if a child is detained for any reason in police custody following charge;
  + Ensure that custody staff make a record of all actions taken and decisions made on the relevant documentation; and
  + Improve awareness among custody staff of child protection (including the risk of sexual exploitation), the standard of risk assessment required to reflect children’s needs, and the support required at the time of detention and on release (467).

**Crime Data Integrity cause of concern and recommendations (force specific)**

In Cleveland Police, officers and staff too often fail to make correct crime-recording decisions at the first opportunity when dealing with reports of violent crime, especially in cases of domestic abuse. This is due to deficiencies in the force’s crime-recording processes, insufficient understanding of crime-recording requirements, and limited supervision to correct the decisions of officers and staff and improve standards from the outset. This means that the force is letting down too many victims of crime. (CDI 2017)

**Recommendations**

* **Within three months**, the force should take steps to identify and address gaps in its systems and processes within its control room for identifying and recording all reports of crime. This work should include a review of:
  + the process for the supervision of the closure of incident records, ensuring that this includes a check of compliance with the crime-recording rules and that sufficient supervisory knowledge and capacity exists to do so;
  + the grading process for incidents; and
  + the procedure for arranging and managing appointments (518).
* **Within six months** the force should put in place arrangements to ensure that:
  + at the point of report, for the purpose of crime recording, greater emphasis is placed on the initial account of victims and that victims are believed following a deployment; and
  + conversations between call handlers and callers are summarised accurately in the incident log and fully communicated to attending officers, thus providing them with full facts on which to base crime-recording decisions (519).
* **Within six months**, the force should design and provide training for relevant staff in regard to:
  + the importance of the first account of the victim when making crime-recording decisions, particularly in cases of domestic abuse;
  + offences involving malicious communications, harassment and public order;
  + recording as full an account as possible from callers within the incident record and making it clear when the incident amounts to a crime; and
  + fully communicating all available information to officers deployed to incidents (520).

**Appendix 1 – Previous AFI mapping**

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| **Ref** | **Short description** | **Status** |
| 355 | Establish a multi-agency safeguarding hub. | Outstanding AFI which continues as 355 |
| 356 | Better understand and address the wellbeing concerns of its workforce. | Closed but superseded with a CoC recommendation numbered as 543 |
| 358 | Ensure stop and search records include sufficient reasonable grounds and officers fully understand the grounds required | Outstanding AFI which continues as 358 |
| 361 | Review complaints and misconduct arrangements to assess whether or not there is any bias in the way decisions regarding the management of complaints are made and take action to remove it. (6 months) | Outstanding AFI which continues as 361 |
| 366 | Use evidence of ‘what works’ drawn from other forces, academics and partners. Ensure routine evaluation of tactics and sharing of effective practice at a local level. | Closed and signed off during IPA 2019 |
| 442 | Ensure Force complies with all aspects of the current national guidelines for vetting. | Closed and signed off during IPA 2019 |
| 443 | Review the capacity and capability of its counter-corruption unit, to ensure it can manage its work effectively. | Outstanding AFI which continues as 443 |
| 444 | Improve the way corruption intelligence is assessed, graded and stored. | Outstanding AFI which continues as 444 |
| 445 | Improve the management of individual performance. | Closed but superseded with a CoC recommendation numbered as 544 |
| 446 | Comply with current national vetting policy or implement a sufficient plan to do so. Within 2 years. | Closed and signed off during IPA 2019 |
| 447 | Complete a retrospective review of allegations for sexual gain and make appropriate referrals to the IPCC. | Closed and signed off during IPA 2019 |
| 448 | Improve capability and capacity to obtain intelligence on potential abuse of authority for sexual gain and build relationships with those organisations that support vulnerable people. | Outstanding AFI which continues as 448 |
| 449 | Widen IOM, set clear measures of success to allow evaluation. | Outstanding AFI which continues as 449 |
| 450 | Ensure that the risks posed by registered sex offenders are managed effectively. | Outstanding AFI which continues as 450 |
| 452 | Ensure that referral of standard-risk DA victims for on-going safeguarding is timely. | Closed but superseded with a CoC recommendation numbered as 556 |
| 455 | Understand outcome 16s for DA and reduce use. | Outstanding AFI which continues as 455 |
| 456 | With partners develop plans around the 4Ps. And assess impact. | Closed and signed off during IPA 2019 |
| 457 | Use preventative initiatives with partners to stop those identified as at risk of being drawn into SOC from offending. | Closed and signed off during IPA 2019 |
| 458 | Review and change our approach to neighbourhood policing to meet national guidelines. | Superseded by 502 – by HMIC (Nationally) |
| 459 | Apprehend wanted suspects promptly including those not circulated on PNC. | Outstanding AFI which continues as 459 |
| 460 | Transfer the responsibility for mapping organised crime groups from the force to the regional organised crime unit. | Closed and signed off during IPA 2019 |
| 472 | Understand and identify gaps in workforce’s capabilities and put plans in place to address them. | Outstanding AFI which continues as 472 |
| 473 | Conduct a leadership skills audit to understand capacity and capability. | Outstanding AFI which continues as 473 |
| 485 | Produce an ambitious plan to improve digitally-enabled services within the force. | Closed and signed off during IPA 2019 |
| 486 | Improve external scrutiny and involve young people in scrutiny arrangements on the use of police powers. | Closed and signed off during IPA 2019 |
| 487 | Comply with IPCC statutory guidance for keeping complainants informed at all stages of the complaints process. | Outstanding AFI which continues as 487 |
| 488 | Reassure the workforce, improve timeliness and ensure wraparound support in relation to grievances | Closed but superseded with a CoC recommendation numbered as 542 |
| 489 | Regularly and frequently monitor data and information on use of stop and search powers to understand disproportionality. | Outstanding AFI which continues as 489 |
| 498 | Use PDR in line to assist in understanding leadership skills and capabilities and effective succession planning. | Outstanding AFI which continues as 498 |
| 499 | Improve the quality of information recorded on the DASH forms at initial response. | Closed but superseded with a CoC recommendation numbered as 553 |
| 500 | Obtain feedback from victims of domestic abuse including those who do not support police action. | Closed and signed off during IPA 2019 |
| 501 | Review the MARAC referral process and the need for greater partner involvement to ensure high-risk victims are not at risk. | Closed and signed off during IPA 2019 |
| 502 | Review and change our approach to neighbourhood policing to meet national guidelines. | Outstanding AFI which continues as 502 |
| 503 | Develop action plan for the shortage in qualified detectives. | Outstanding AFI which continues as 503 |
| 504 | Review the implementation of changes to pre-charge police bail. | Outstanding AFI which continues as 504 |