



28th February 2018

The Rt. Hon Amber Rudd MP
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Dear Home Secretary

PEEL: Police Legitimacy (Including Leadership) 2017

I have reviewed in detail the report and I am disappointed that the overall judgement of the inspection is 'requires improvement'. I have some observations on the inspections findings which I will comment upon.

All sections of the report highlighted significant improvements, good practice and the tone of report was generally positive, yet this was not reflected in the overall grade.

I will now address each of the areas for improvements (AFI) in turn.

Please note that since the factual accuracy report was received by the Force a PEEL 2017 Legitimacy Working Group, led by ACC Martin Evans, has been working to address the areas for improvement and other adverse comments in the report. My team, who are represented on this Group, are fully sighted on the action plan and oversee delivery against it. I am reassured that a lot of activity is taking place to address the concerns raised during the inspection.

The Force should ensure that all relevant officers have received sufficient, suitable training to enable them to use powers of arrest only when necessary

The report makes reference that the Alliance needs to take steps to ensure that its frontline officers understand when it is necessary to arrest as thoroughly as they understand other coercive powers. This conclusion which was not Warwickshire specific was based on contact with an unspecified number of officers so I am unable to judge the justification for this AFI.

In addition, a significant analysis of arrest / voluntary interview data has been conducted and the resultant conclusion indicates that during a 12 month period the inappropriate use of Code G powers was identified in only 0.07% of cases.

Nevertheless, the action plan I have referred to clearly details further training on the use of necessity to arrest, which is planned and ongoing for officers via officer safety training sessions, custody officer training and student officer training.

The Force should improve its process for regularly and frequently scrutinising a broad range of data and information, including from body-worn video, to understand its use of force and improve how its workforce treats people with fairness and respect.

It should also evaluate how Stop and Search activity reflects its priorities, to provide further reassurance to communities that its use of Stop and Search is fair and effective.

The inspection did not identify any disproportionate use of force which was reassuring. However, it did find that the processes for reviewing officers' use of force, other than that of Taser, were not sufficiently structured or comprehensive. Officers and staff do currently submit records about most types of force used but the analysis of this information was deemed to be currently insufficient.

Body worn video roll out in the Force was only completed in the Autumn of 2017 just before this inspection took place. The working group is now working to ensure that data from use of force forms and images captured on body-worn video are both used to gain a clearer understanding of the use of force and ensure that in all cases the force used was lawful and proportionate.

With regards to Stop Search, whilst I acknowledge the need to evaluate how Stop and Search activities relate to my priorities in the Police and Crime Plan, of greater importance to me is that any search conducted is lawful and justified. In this regard the report highlighted the tremendous improvements that the Force has made over the past few years. In the 2013 inspection 47 out of 200 Stop and Search records reviewed did not have the grounds recorded. In 2015, 29 over 200 records lacked the grounds and during this year's inspection only 3 out of 200 (98% compliance) did.

Please note that for this year's stop search inspection I am using the stop and search figure which was in the factual accuracy report, as I am unclear as to why the number of records lacking grounds increased from 3 (factual accuracy) to 12 in the final report.

On this basis I am confident that Warwickshire Police are conducting justified Stop and Searches and, as the inspection states for the small number of records that lacked details of reasonable grounds that does not mean that such grounds did not exist at the time of the Stop and Search.

The Force should review the accuracy and timelines of information in includes on the website about Chief Officers' pay, rewards and business interests

The working group has now assigned responsibility for this to the Head of Professional Standards for Gifts and Hospitality and Business Interests and to the Head of Accounting Services for Chief Officers' Pay and Awards.

Since the inspection took place this information has not been updated (checked on 21st February 2018) and I will take this up with the Chief Constable to ensure compliance.

The Force should review how it promotes access to the complaints system, including the support it is able to offer people who may need additional assistance and those in communities that have lost trust and confidence in the police. It should also improve how it keeps complainants, witnesses and those subject to allegations updated about the progress of investigations.

During the inspection 25 police complaints were reviewed and one of those was a case where the complainant needed additional support, which was provided. However the inspection highlighted the need for Warwickshire Police to do more to support complainants who require additional assistance and those in communities that have lost trust and confidence in the police in making a complaint. This I agree with.

I am aware that the PSD Section of the Force website has a link to the Independent Office for Police Conduct (IOPC) which provides further information and guidance for complainants e.g, 'How to complain' versions in foreign languages but I am not sure how accessible and useful this link is.

The AFI is included in the action plan and I will keep progress in this area under review.

In addition, the Force's performance in providing regular updates to complainants in police complaint cases requires improvements and the same applies to witnesses and those the subject of allegations in misconduct cases. This needs to improve quickly and the activity of the working group will be monitored closely in this regard by my team.

The Force should ensure that it has effective systems and processes in place to understand the underlying causes of threats to its workforces' wellbeing and takes action to mitigate them

The inspection found that the Force is good at prioritising the wellbeing of its workforce. It has a Health and Wellbeing Initiative which was launched during 2016 and progress against this is monitored by the Health and Wellbeing Board and the Workforce Management Group, both of which are led by Chief Officers.

Senior leaders were also found to treat mental health amongst officers and staff as a priority.

The Force has an understanding of the risks and threats to the wellbeing of the workforce and takes action to address them but the inspection found that it needed to do more to establish the under-lying causes.

I am aware of the current pressures on the workforce. Officer sickness particularly is increasing, operational demand is growing and significant organisational change is in progress and will continue in the medium term so we must make every effort to support and look after our workforce.

I await the outcome and analysis of the latest Staff Survey which has just been concluded and this, together with the findings of this inspection, will be discussed further with the Chief Constable. Progress in delivering against this AFI will be taken forward by the working group as outlined earlier.

The Force should ensure that its supervisors can recognise warning signs, intervene early and provide support to officers and staff who may be experiencing problems affecting their wellbeing

The range of preventative measures being used to reduce sickness was acknowledged in the report. Supervisors recognised their welfare responsibilities but some felt ill equipped to recognise individual warning signs and wanted the Force to do more to provide them with support and guidance in this area, particularly with regards to mental health issues.

A chief officer is leading on a range of actions to address this AFI. This includes the following:-

- Provision of an online training package in support of the Stress Management Policy
- Training delivered by MIND to officers as part of the Blue Light Pledge Initiative
- HR officers providing coaching sessions for supervisors on Health and Wellbeing
- Peer support network which provides support and advice to both staff and line managers
- 24/7 Employee Assistance Programme Service which provides advice to staff members and managers
- An increased welfare officer provision enabling more proactive work to be undertaken

Current activity in this area is clear and it will help to address this AFI. I will monitor progress going forward.

The Force should ensure that it has effective systems, processes and guidance to manage individual performance and identify the most talented individuals within its workforce

This weakness was identified during the last inspection. It is critical that the Force has an effective method of assessing and developing its officers and staff. The current performance assessment process (PDR) has largely fallen into disrepute with the inspection finding only slight evidence of discussions about performance between supervisors and the individuals they supervise being documented. Little evidence was found of unsatisfactory performance procedures being used to address under performance, which also is concerning.

Continuing professional development (CPD) has been trialled and following review the Force is now expanding its use but progress in this area needs to be accelerated and the whole issue addressed as a priority. In terms of identifying talent within the workforce much work is already in progress. The use of talent mapping is expanding and improvements in the system of assessing a persons suitability for promotion are progressing.

The Force has now introduced national initiatives such as direct entry at inspector level, Fast Track and Police Now, all of which will improve the talent pool of individuals within the workforce.

As stated previously, I am naturally disappointed with the overall grade of 'requires improvement' With so much good work going on, much of which is highlighted in the report, I find it difficult to understand how the Legitimacy grade has gone from a 'good' (last inspection) to the current grade. In my view this seems harsh and doesn't present a balanced view of Force performance in this area.

However, a number of AFI's have been identified and I and my team will work to ensure that they are addressed and that improvements are made in the areas of weaknesses that have been highlight or outlined in my response.

Yours sincerely



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Police and Crime Commissioner

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