

**Gloucestershire Police and Crime Panel**

**Wednesday 3 November 2021 at 10.00 am**

**Council Chamber - Shire Hall, Gloucester**



## **AGENDA**

<b>1</b>	<b>APOLOGIES FOR ABSENCE</b>	Andrea Clarke
<b>2</b>	<b>MINUTES OF THE PREVIOUS MEETING</b> (Pages 1 - 6)	Andrea Clarke
<b>3</b>	<b>DECLARATIONS OF INTEREST</b> Please see note (a) at the end of the agenda.	Andrea Clarke
<b>4</b>	<b>HMICFRS INSPECTION REPORT</b> (Pages 7 - 70)	PCC Chris Nelson
<b>5</b>	<b>AMENDMENT TO THE HANDLING OF COMPLAINTS PROCEDURE</b> (Pages 71 - 74)	Andrea Clarke

### **FUTURE MEETINGS**

4 February 2022  
25 March 2022

All meetings start at 10.00am and are held in Shire Hall, Gloucester.

**Membership** – *Cllr Joe Harris, Cllr Sajid Patel, Cllr Steve Robinson (Vice-Chair) and Cllr Brian Tipper Cllr Ray Brassington, Cllr Jonny Brownsteen (Chairman), Cllr Philip Burford, Cllr David Gray, Cllr Dawn Melvin and Cllr Martin Percy*  
**Independent Members** - *William Alexander (Independent Member) and Martin Smith (Independent member)*

- (a) **DECLARATIONS OF INTEREST** – – Please declare any disclosable pecuniary interests or personal interests that you may have relating to specific matters which may be discussed at this meeting, by signing the form that will be available in the Cabinet Suite. Completing this list is acceptable as a declaration, but does not, of course, prevent members from declaring an interest orally in relation to individual agenda items. The list will be available for public inspection.

Members requiring advice or clarification about whether to make a declaration of interest are invited to contact the Monitoring Officer (Rob Ayliffe Tel: 01452 328506 e-mail:



[rob.ayliffe@gloucestershire.gov.uk](mailto:rob.ayliffe@gloucestershire.gov.uk)) prior to the start of the meeting.

- (b) **INSPECTION OF PAPERS AND GENERAL QUERIES** - If you wish to inspect Minutes or Reports relating to any item on this agenda or have any other general queries about the meeting, please contact:

Andrea Clarke, Senior Democratic Services Adviser

☎:01452 324204 e-mail: [andrea.clarke@gloucestershire.gov.uk](mailto:andrea.clarke@gloucestershire.gov.uk)

- (c) **GENERAL ARRANGEMENTS**

Please note that photography, filming and audio recording of Council meetings is permitted subject to the Local Government Access to Information provisions. Please contact Democratic Services (tel 01452 324203) to make the necessary arrangements ahead of the meeting. If you are a member of the public and do not wish to be photographed or filmed please inform the Democratic Services Officer on duty at the meeting.

**EVACUATION PROCEDURE** - in the event of the fire alarms sounding during the meeting please leave as directed in a calm and orderly manner and go to the assembly point which is **outside the main entrance to Shire Hall in Westgate Street**. Please remain there and await further instructions.



## GLOUCESTERSHIRE POLICE AND CRIME PANEL

**MINUTES** of a meeting of the Gloucestershire Police and Crime Panel held on Tuesday 28 September 2021 at the Virtual Meeting - Web ex meeting.

**PRESENT:**

Cllr Ray Brassington	Cllr Dawn Melvin
Cllr Jonny Brownsteen (Chairman)	Cllr Sajid Patel
Cllr Philip Burford	Cllr Martin Pearcy
Cllr David Gray	Cllr Steve Robinson (Vice-Chair)
Cllr Joe Harris	Martin Smith

Others in attendance: Chris Nelson – Police and Crime Commissioner  
Nick Evans – Deputy Police and Crime Commissioner  
Richard Bradley – Chief Executive, Office of the Police and Crime Commissioner  
Ruth Greenwood – Deputy Chief Executive, Office of the Police and Crime Commissioner

Apologies: William Alexander and Cllr Brian Tipper

**1. MINUTES OF THE PREVIOUS MEETING**

The minutes of the meetings on 7 July 2021 at 10.00am and 12.37pm were agreed as a correct record subject to the following amendment:-  
Martin Smith, Independent Member, was present at the 10.00am meeting.

**2. DECLARATIONS OF INTEREST**

No declarations of interest were received.

**3. UPDATE ON RECENT ACTIVITY - OFFICE OF THE POLICE AND CRIME COMMISSIONER**

- 3.1 The Police and Crime Commissioner (PCC) updated the Panel on the activity related to the roadshows, and also informed members that much of his time presently is spent looking at the internal structure of the Police, in particular the Force Control Room (FCR).
- 3.2 The Panel were informed that HMICFRS was due to publish its report of their recent inspection of the Constabulary. Members were informed that it was expected that the report would be hard hitting particularly with regard to the FCR.
- 3.3 The Deputy Police and Crime Commissioner (DPCC) informed the Panel that the meetings of Safer Gloucestershire had resumed. The membership was being reviewed and had so far been extended to include the Chairs of the Community Safety Partnerships (CSPs). The DPCC was clear that he wanted Safer Gloucestershire to deliver not to just be a talking shop. It was agreed that the terms of reference for this group would be shared with the Panel.

**ACTION: Nick Evans**

- 3.4 The Chief Executive, Office of the Police and Crime Commissioner (OPCC), was pleased to inform the Panel that the Sabrina Centre had recently been awarded silver in the regeneration category of the iESE Public Sector Transformation awards. With regard to the recently enacted Domestic Abuse Act (2021) the OPCC would be advertising for a

Domestic Abuse and Sexual Violence Officer to support the partnership boards when engaging with communities. The OPCC in conjunction with the other 4 OPCCs in the South West Region were also advertising for a Regional Strategic Policy and Research Officer.

- 3.5 The PCC informed members that he would welcome the Panel establishing a Budget Task Group to meet ahead of and post the public consultation period. The Panel agreed to commission a task group on this matter; the task group would report in to the precept meeting on 4 February 2022.  
**ACTION: Andrea Clarke/Ruth Greenwood**
- 3.6 In response to a question the PCC informed the Panel that it was expected that the 300 additional officers would be recruited over a three year period.
- 3.7 With regard to rural crime the PCC explained that the Police already utilised drones. He was also looking to double the number of officers that were specialist rural officers, and establish a 7 day a week rural policing service.
- 3.8 In response to a question relating to the use of ANPR in rural areas the PCC explained that ANPR was an expensive option. He was looking at more affordable ways to do this, and at the roadshows had been promoting the use of community speed watch with local volunteers.
- 3.9 A member stated that in the PCC's manifesto he had stated that he would end the culture of spin, which would save money, and questioned how much had been saved. The PCC informed the Panel that the previous regime had had its own way of looking at things, including spending on buildings; he preferred to focus on what was needed. The PCC stated that so far in the region of £2m had been saved.
- 3.10 In response to a question related to the costs of the additional Police Officers over the next 10 years was £10m.

#### **4. DRAFT POLICE AND CRIME PLAN**

- 4.1 The Deputy Chief Executive, OPCC, gave a detailed presentation on the draft Police and Crime Plan.
- 4.2 The Panel was informed that the OPCC would be introducing a survey scheme to get a broader understanding of the view of Gloucestershire residents on police and crime matters.
- 4.3 It was explained that the delivery plans would be scoped out once the plan was on a firmer basis. The Constabulary were also developing a performance framework for each priority; these would be reported to the Panel in due course. The performance framework/dashboard would be developed such that the lay person would be able to easily understand what the data was saying.
- 4.4 In response to a question it was explained that the manifesto pledges had been absorbed into the plan. The Panel agreed that it was good to see that targets/performance measures would be an integral part of the delivery of the plan.
- 4.5 With regard to how safe people feel the Panel was informed that Gloucestershire was rated as the seventh safest area in the country. However, the PCC stated that he was aware that there was a mass of unreported crime (eg. domestic abuse, sexual abuse, shoplifting); it would be important to encourage and give people the confidence to report crime.

- 4.6 Whilst welcoming a public health approach to policing there was concern that this was in direct opposition to the approach of some of the priorities, in particular to reduce anti social behaviour; it would be important to keep an eye on both sides of the agenda. The Deputy Chief Executive explained that all officers were trained to take a trauma informed approach to policing; the Police could not arrest its way through old problems. It was also important to ensure that there was a partnership approach.
- 4.7 The PCC indicated that whilst his focus was on the Police there were always opportunities to work holistically with other agencies. It was important to note that a public health approach to policing required a lot of resources, and the PCC would be encouraging other agencies to get around the table.
- 4.8 The PCC was clear that a lot more could be done with regard to the criminal justice system. The PCC acknowledged that the Constabulary could do better with regard to investigating sexual violence and fraud.
- 4.9 In response to a question about the Commissioners Fund the PCC explained that he had changed the approach to this fund; it was important to ensure that available resources were used effectively.
- 4.10 A member commented that there were some outstanding officers and support staff in the Police, but everyone had heard examples of not so good practice, and it was questioned how to encourage better use of police time. The PCC acknowledged that this was not an easy question to answer. From his perspective it seemed that previously a lot of money had been used on buildings rather than systems; he did see inefficiencies. With regard to operational matters the responsibility lay with the Chief Constable, the PCC could not instruct. The PCC did of course discuss issues with the Chief Constable, and he was aware that the Chief Constable wanted to achieve a level of excellence, and to get to a position where the Force had exemplars of excellence, and the Force achieved an outstanding rating from HMICFRS.
- 4.11 The Deputy Chief Executive informed the Panel that often the public were not fully aware of the breadth of work that the Police were involved in, for example, the response to mental health crises. A significant part of Police work now related to safeguarding issues as opposed to responding to crime. The Deputy PCC was clear that this must be addressed through a partnership approach.
- 4.12 The Panel agreed that it could support the draft plan; it was clear and comprehensive, and it was good to note that there was an emphasis on victims.
- 4.13 Some members expressed their concern that there did seem to be a two pronged approach from the police when responding to crime in that large stores would get an immediate response whereas a more moderate approach appeared to be the norm for small local stores/shops.
- 4.14 The Panel was assured that once the plan was final performance data would be published on the OPCC website. With regard to comparing with peers it was important to note that there was a time lag in the reporting of this data. It was reiterated that the OPCC would be launching a survey in due course to better understand the concerns of the people of Gloucestershire.

## **5. E SCOOTERS - THE GLOUCESTERSHIRE POSITION**

- 5.1 The PCC informed the Panel that the OPCC had been pleased to support the trial of e-scooters. Information coming through indicated that enforcement was an issue. It was commented that in Cheltenham enforcement was mainly undertaken by Zwings.
- 5.2 The PCC informed the Panel that once the trial period was over the government would publish a report on the findings and recommendations on the way forward.
- 5.3 The Deputy PCC informed the Panel that the approach taken by the Police was to educate, engage and enforce. It was noted that it was difficult to engage with someone on an e-scooter if the officer was no foot. The Deputy PCC was of the view that there had been some irresponsible retailing of e-scooters; that is, not making it clear that they cannot be used on the highway (only those supplied through the trial can be used on the highway). He clarified that users of e-scooters would receive two warnings, the scooter would be seized on the second warning; the Police were seizing about 9 a month at present. Given the level of engagement the Deputy PCC felt that people were aware the limitations on use of e-scooters.

(Post meeting note: Following the meeting it was clarified that the statement that 'users of e-scooters would receive two warnings and that the e-scooter would be seized on the second warning' was incorrect and a genuine mistake. The correct position is that: - Privately owned e-scooters can only be ridden on private land with the permission of the land owner. They are classed as a motor vehicle and they cannot be insured, registered for road use and do not comply with any of the requirements of the Road traffic Act 1988 and are therefore not able to be ridden on a public road, pavement, bridleways or public place. Anyone caught riding an e-scooter in breach of the above can have their e-scooter seized as it has no insurance or if it is being used in such a way that it causes harassment, alarm or distress.

In the context of Trial rental e-scooters, that is, the current schemes in Cheltenham Town and Gloucester City that are running until April 2022, these can only be ridden within designated zones and if the rider has the relevant driving licence.)

- 5.4 The data supplied by Zwings showed that it was a small fraction of users who created the problems.
- 5.5 The Chairman informed the Panel that enforcement should not be the responsibility of the operator. It was being reported to him that the Police were intentionally not reporting this crime; he had yet to receive a rebuttal of this. He questioned what instructions had been given to the constabulary on this matter. The Deputy PCC informed the Panel that enforcement was an operational matter, but that he would be happy to take these issues forward with the Constabulary and requested further information from the Chair regarding the issue he raised.

**ACTION: Chair/DPCC**

## **6. THE FUTURE OF THE MOUNTED POLICE**

- 6.1 The PCC informed the Panel that he had requested a review into the Mounted Section following some criticism of the section from some members of the public. The initial review found that the current model was not optimal. Further work has been requested to establish if an alternative model, with more horses, actually provided value for money opportunities through sponsorship and mutual aid. Similar opportunities have been realised in other forces, particularly Merseyside, which has achieved a close to cost neutral mounted section. The PCC was of the view that the current service was more of a

*Minutes subject to their acceptance as a correct record at the next meeting*

neighbourhood police service, supporting reassurance and problem solving activity when required. The PCC was clear that resources were directed to business need.

- 6.2 It was unfortunate that the current construction of stables at Bamfurlong could not be stopped; it was not contractually viable to do so from a financial perspective.
- 6.3 Members were concerned as to the costs involved in the provision of this service, and disappointed that the cost of withdrawing from the contract to build the stables was prohibitive. There was concern that the costs of this service had not previously been shared with the Panel; and it was questioned whether this was an effective use of public money. The Panel was informed that the Chief Constable was supportive of this section and agreed that it would be helpful to understand why this was.
- 6.4 The PCC was clear that the review of this service was not currently a priority. He acknowledged the Panel's comments and concerns and these would be taken forward as part of the review.

## **7. PANEL WORKPLAN**

- 7.1 The Panel agreed that the meeting on 3 November 2021 should be focused on the HMICFRS inspection report which was due to be published.
- 7.2 The Panel agreed to progress the Budget Working Group.

## **CHAIRMAN**

Meeting concluded at 12.56 pm

This page is intentionally left blank



## **PEEL 2021/22**

### **Police effectiveness, efficiency and legitimacy**

An inspection of Gloucestershire Constabulary

# Contents

<b>Overall summary</b>	<b>1</b>
Our judgments	1
Important changes to PEEL	2
HM Inspector's observations	2
Reducing crime assessment	4
<b>Performance in context</b>	<b>6</b>
<b>Providing a service to the victims of crime</b>	<b>8</b>
Crime data integrity	8
Causes of concern	8
Areas for improvement	10
Main findings	13
<b>Engaging with and treating the public with fairness and respect</b>	<b>15</b>
Innovative practice	15
Main findings	16
<b>Preventing crime and anti-social behaviour</b>	<b>19</b>
Area for improvement	19
Main findings	19
<b>Responding to the public</b>	<b>22</b>
Areas for improvement	22
Main findings	25
<b>Investigating crime</b>	<b>27</b>
Cause of concern	27
Areas for improvement	27
Main findings	29
<b>Protecting vulnerable people</b>	<b>32</b>
Area for improvement	32

Main findings	34
<b>Managing offenders and suspects</b>	<b>37</b>
Area for improvement	37
Main findings	38
<b>Disrupting serious organised crime</b>	<b>41</b>
Innovative practice	41
Main findings	41
<b>Meeting the strategic policing requirement</b>	<b>46</b>
Main findings	46
<b>Protecting the public against armed threats</b>	<b>49</b>
Main findings	49
<b>Building, supporting and protecting the workforce</b>	<b>52</b>
Innovative practice	52
Areas for improvement	52
Main findings	53
<b>Strategic planning, organisational management and value for money</b>	<b>57</b>
Cause of concern	57
Areas for improvement	58
Main findings	59

# Overall summary

## Our judgments

Our inspection assessed how good Gloucestershire Constabulary is in 13 areas of policing. We make graded judgments in 11 of these 13 areas, as follows:

Outstanding	Good	Adequate	Requires improvement	Inadequate
	Preventing crime	Managing offenders		Investigating crime
	Treatment of the public			Supporting victims
	Disrupting serious organised crime			Recording data about crime
	Developing a positive workplace			Responding to the public
				Protecting vulnerable people
				Good use of resources

We also inspected how well Gloucestershire Constabulary meets its obligations under the [strategic policing requirement](#), and how well it protects the public from armed threats. We do not make graded judgments in these areas.

We set out our detailed findings about things the force is doing well and where the force should improve in the rest of this report.

## Important changes to PEEL

In 2014, we introduced our police effectiveness, efficiency and legitimacy (PEEL) inspections, which assess the performance of all 43 police forces in England and Wales. Since then, we have been continuously adapting our approach and this year has seen the most significant changes yet.

We are moving to a more intelligence-led, continual assessment approach, rather than the annual [PEEL inspections](#) we used in previous years. For instance, we have integrated our rolling crime data integrity inspections into these PEEL assessments. Our PEEL victim service assessment will now include a crime data integrity element in at least every other assessment. We have also changed our approach to graded judgments. We now assess forces against the [characteristics of good performance](#), and we more clearly link our judgments to causes of concern and areas for improvement. We have also expanded our previous four-tier system of judgments to five tiers. As a result, we can state more precisely where we consider improvement is needed and highlight more effectively the best ways of doing things.

However, these changes mean that it isn't possible to make direct comparisons between the grades awarded this year with those from previous PEEL inspections. A reduction in grade, particularly from good to adequate, does not necessarily mean that there has been a reduction in performance, unless we say so in the report.

## HM Inspector's observations

I recognise that, in common with others, the force has faced many challenges over the past year in making the transition out of the pandemic. However, I have concerns about the performance of Gloucestershire Constabulary in keeping people safe and reducing crime.

These are the findings I consider most important from our assessment of the force over the last year.

### **The force's service to victims of crime is inadequate and it isn't recording crime effectively**

The force is sometimes missing opportunities to [safeguard vulnerable people](#). It needs to improve the way it manages initial calls to the force, so all vulnerable people are identified when crimes and incidents are reported. The way crime is recorded has improved since our last inspection in 2019. But I am concerned that it still isn't effective, particularly in cases of [domestic abuse](#) and [anti-social behaviour](#).

### **The force isn't yet able to respond to calls effectively despite establishing a new way of working**

The force has a new model for responding to the public. But it still doesn't have the capacity or capability to respond effectively to calls to the control room or when it deploys officers to incidents or crimes. The force should gain a better understanding of these demands and be able to manage its resources more effectively as the new system develops.

### **The way the force investigates crime is inadequate**

The force must make sure that officers have the capacity and ability to investigate reported crimes properly and promptly. Opportunities to prosecute are being missed because investigations are poor, or because officers haven't collected evidence or persevered in enough cases where the victim no longer wishes to pursue a prosecution. This makes successful prosecutions less likely, which lets victims down.

### **The force is good at treating people fairly and with respect**

The force works well with communities. It is improving its understanding of the use of force and it understands and is improving the way it uses stop and search. It has also put in place effective external scrutiny arrangements.

### **The force is good at preventing crime and anti-social behaviour**

The force uses problem-solving well and works with other organisations to reduce demand and safeguard vulnerable people.

### **The force is good at identifying and tackling serious and organised crime**

There has been a significant improvement from the last inspection. [Serious and organised crime](#) is now a priority and is being tackled using [intelligence](#) at force and local level. I am pleased to see the force is working with other organisations to tackle serious and organised crime.

### **The force needs to significantly improve the way it manages its resources so it can meet future demands**

Gloucestershire Constabulary's financial and strategic planning is inadequate. It hasn't shown it understands what skills its workforce has and where there are gaps. It hasn't shown it provides value for money. The force needs to better understand the likely future demand for its services and make sure it can meet them.

### **The force is well placed to respond to serious and cross-border threats and protect the public from armed threats**

The force is performing well in these areas.

My report now sets out the fuller findings of this inspection. I will monitor the force's progress towards addressing the areas I have identified where the force can improve further.



**Wendy Williams**

HM Inspector of Constabulary

## Reducing crime assessment

We have identified seven themes underpinning a force's ability to reduce crime effectively which, taken together, allow an assessment of the extent to which the force is doing all it can to reduce crime. This is a narrative assessment, as police recorded crime figures can be affected by variations and changes in recording policy and practice, making it difficult to make comparisons over time.

Gloucestershire Constabulary has processes in place to analyse data from each business area using a scorecard system. It uses this information to learn lessons.

The force has a problem-solving culture, but this approach is used inconsistently throughout the force.

Its engagement with diverse communities to understand and respond to what matters to them is good. It is involved in many community initiatives and activities that build trust and confidence in the police, and it is good at preventing and diverting people away from offending behaviour.

The force has strong working arrangements and works well with other organisations.

Other factors contributing to the force's ability to reduce crime are:

- The force uses a range of methods to work well with local communities.
- It complies with, and follows, the [College of Policing's](#) neighbourhood policing guidelines.
- Its contributions in meetings with other organisations are well developed and effective. For example, with the local strategic partnership (LSP), the [multi-agency safeguarding hub](#) (MASH) and the [multi-agency risk assessment conference](#) (MARAC).

It is recommended that the force reviews its crime identification and safeguarding processes to ensure that:

- all reported crimes are recorded;
- effective assurance frameworks are developed to monitor crime recording standards, which translate into better practice; and
- information reviewed by the MASH is the fullest available and doesn't rely solely on information provided by officers at the scene.

It is disappointing that the force is failing to effectively address the right areas of policing to reduce crime.

The force doesn't investigate crimes effectively. Crimes investigations are not consistently supervised to a good standard and sometimes victims aren't updated, resulting in some offenders not being brought to justice.

The following areas may negatively affect the force's ability to reduce crime:

- The force doesn't understand its current and future demand. It needs to review and monitor its call-taking capacity, capability and processes. This will help allocate resources to better manage demand.
- The force's crime identification and safeguarding processes do not currently ensure that all reported crimes are recorded, and vulnerable or repeat victims are not always identified. This means that some victims don't get the service or protection they need.
- The inconsistent application of an effective [THRIVE](#) risk assessment by call handlers, accompanied by the absence of victim needs assessments and the absence of the re-assessment of risk and the limited extent to which repeat victims are identified and recorded, potentially leaves victims at risk. (The THRIVE principles are Threat, Harm, Risk, Investigation, Vulnerability and Engagement.)
- Call handlers are missing the opportunity to give callers advice, such as information on preserving evidence and crime prevention.
- Some crimes are being allocated to officers who lack the skills to properly investigate them. And investigative opportunities are being missed.
- The force is failing to record domestic abuse, behavioural crimes and crimes linked to antisocial behaviour, which is significantly affecting its crime recording standards.

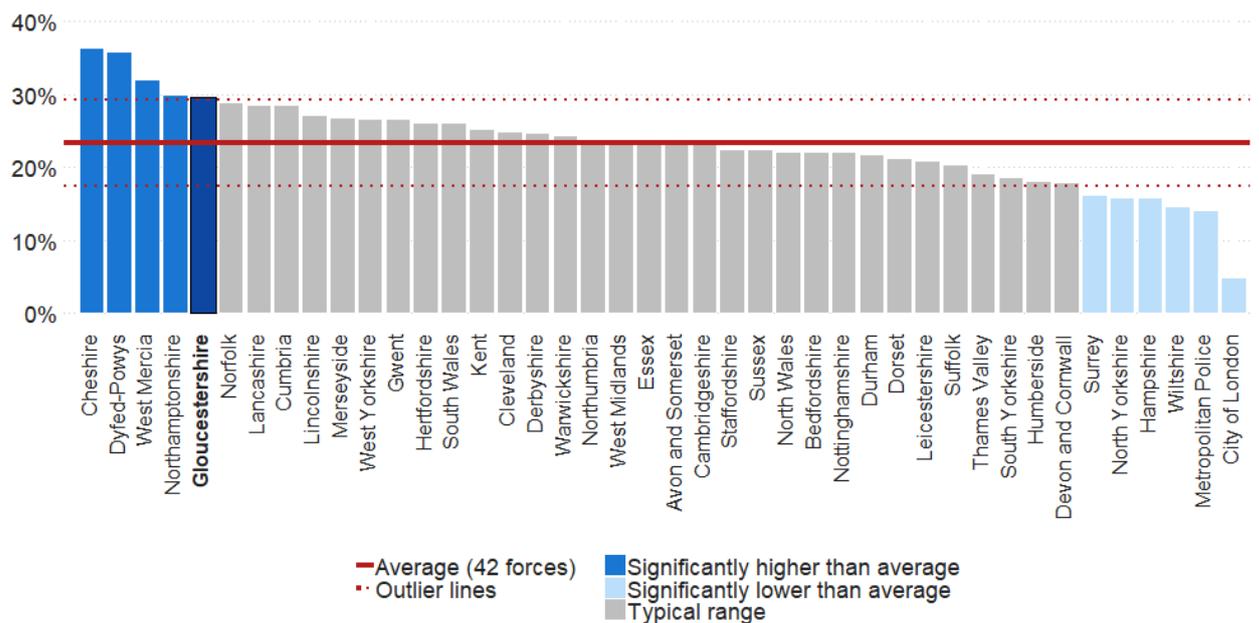
# Performance in context

As part of our continuous assessment of police forces, we analyse a range of data to explore performance in all aspects of policing. In this section, we present the data and analysis that best illustrate the most important findings from our assessment of the force over the last year. For more information on this data and analysis, please [view the force report on our website](#) and select the 'About the data' section.

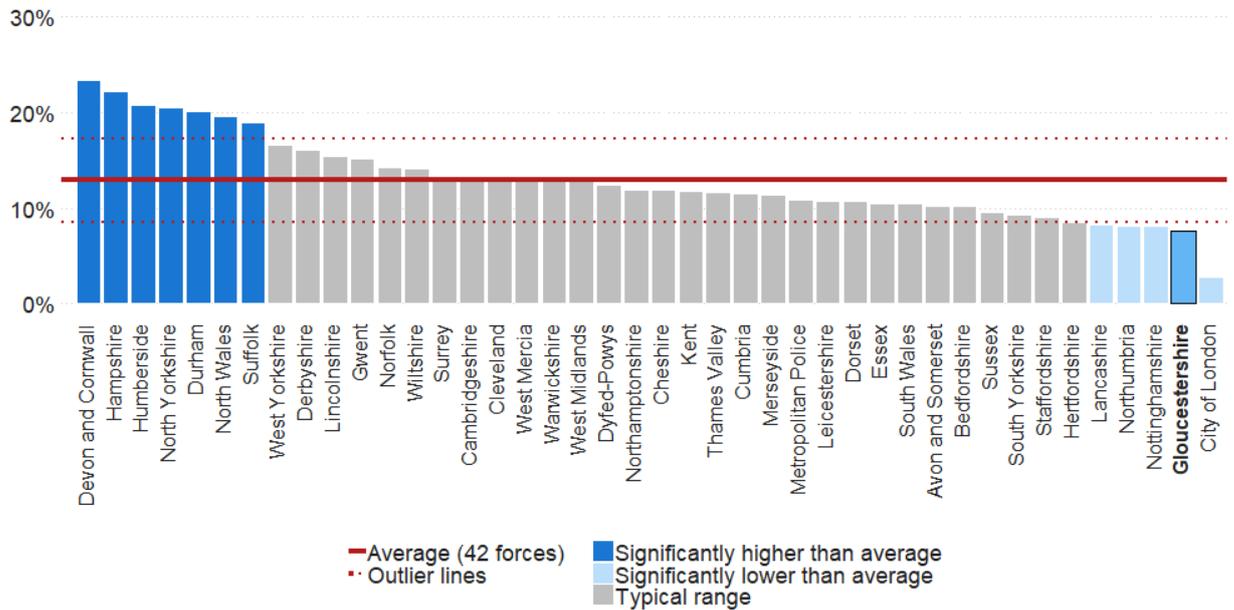
For all offences recorded by Gloucestershire Constabulary in 2020, 30 percent had an outcome of evidential difficulties ([outcome 16](#)). This is when the suspect has been identified but the victim doesn't support further action. This is a significantly higher proportion than the average for other forces, which was 23 percent.

Over the same period, only 8 percent of offences resulted in [outcome 15](#), when a suspect is identified and the victim supports further action but there are other difficulties (such as the suspect can't be traced). This is a significantly lower proportion than the average for other forces, which was 13 percent. The force doesn't consistently conduct thorough investigations that lead to satisfactory results for victims.

## Proportion of offences recorded in 2020 with an outcome of 'evidential difficulties: suspect identified; victim does not support further action' (outcome 16)

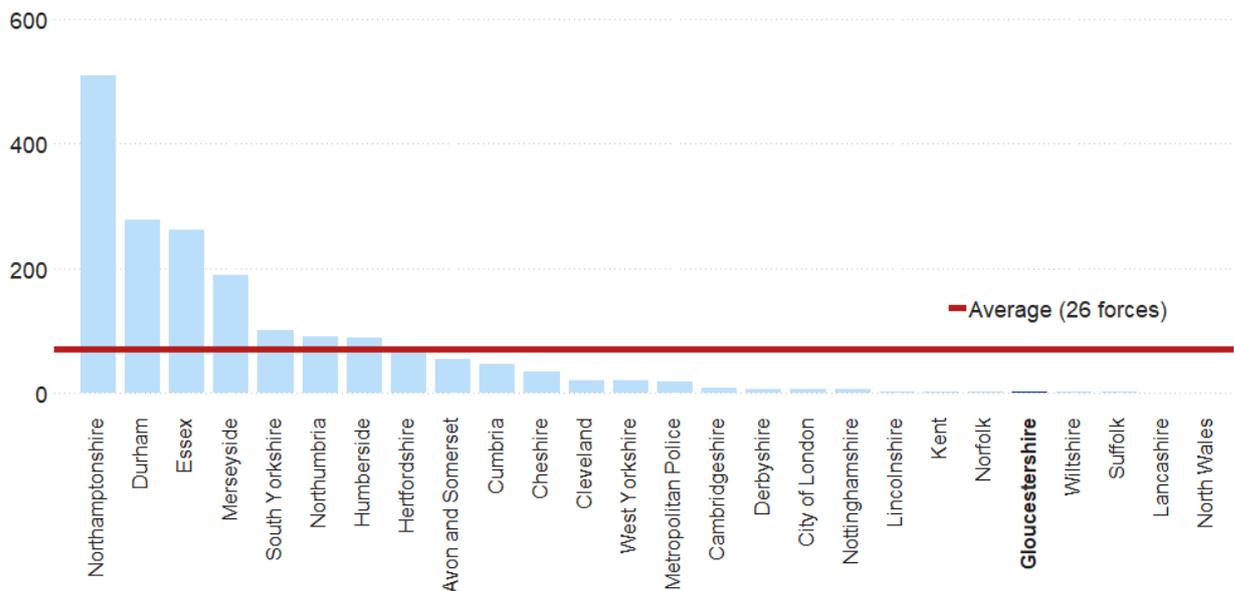


## Proportion of offences recorded in 2020 with an outcome of ‘evidential difficulties: suspect identified; victim supports action’ (outcome 15)



In the year ending 30 September 2020, Gloucestershire Constabulary flagged repeat callers in 412 incidents, which was equivalent to fewer than 3 in every 1,000 incidents. This is much lower than the average flagged for the 26 forces that provided data, which was 71 in every 1,000 incidents. This limited extent to which repeat victims are identified and recorded potentially leaves victims at risk.

## Repeat callers flagged per 1,000 incidents in the year ending 30 September 2020



# Providing a service to the victims of crime

Inadequate

Gloucestershire Constabulary is inadequate at providing a service for victims of crime.

## Crime data integrity

Inadequate

Gloucestershire Constabulary is inadequate at recording crime.

## Causes of concern

**The force recognises that it needs to review and monitor its call-taking capacity, capability and processes, to help it better manage demand. To address this, it has started to put processes in place. This would reduce the average time taken to answer 999 calls and reduce the number of 101 calls that are abandoned**

The force told us that it takes on average 12.3 seconds to answer 999 calls, which is above the national target of 10 seconds. This means that calls from victims are not being responded to as quickly as in other parts of the country.

In December 2020, the force told us that its call abandonment rate was 25 percent. This also reflects similar performance over recent months. The force told us that it has had an average abandonment rate of 32 percent for the past three years. It now has regular strategic monitoring in place and a planned series of IT upgrades and improvements within the [force control room](#) to improve efficiency and better manage demand. However, despite some signs of improvement, the current sustained abandonment rate for [101 calls](#) is a cause of concern.

Gloucestershire Constabulary should continue to review the way it answers calls from the public to reduce the time it takes to answer them and the number that are abandoned.

**The inconsistent application of an effective THRIVE (threat, harm, risk, investigation, vulnerability and engagement) risk assessment by call handlers, accompanied by the absence of victim needs assessments and the limited extent to which repeat victims are identified and recorded, potentially leaves victims at risk. This means that they aren't always getting the service they should expect. This is a cause of concern**

Gloucestershire Constabulary should:

- put processes in place to make sure that call handlers risk assess, and complete a victim needs assessment for, every call;
- check systems to identify and record all repeat victims, and make sure that these victims receive a response that keeps them safe; and
- review and refresh training for call takers to help them assess the level of risk involved in a call, make effective decisions to manage risk and protect victims, and decide on an appropriate response. Supervisors need to carry out regular audits to check this is being done.

**Gloucestershire Constabulary is failing to record domestic abuse, behavioural crimes, and crimes linked to anti-social behaviour. This is significantly affecting the force's crime recording standards. And it shows that victims of domestic abuse, behavioural crimes and anti-social behaviour are not getting the service they have a right to expect and deserve**

Gloucestershire Constabulary should:

- ensure that it is recording all domestic abuse and behavioural crimes; and
- ensure that it is identifying and recording all crimes reported in incidents classified as anti-social behaviour.

**The force needs to make sure that crimes are investigated effectively**

Although it has guidance documents for investigations, there is a lack of clarity for staff on crucial elements of how to provide victims with a good service.

The force doesn't provide enough direction on victim needs assessments, evidence-led prosecutions, or quality assurance measures. This would make sure victims receive a high standard of investigations. There is no policy setting out how to manage delays in allocating investigations to staff and officers. This is necessary as delays in investigations can lead to a failure to safeguard victims and missed opportunities for collecting evidence. Although direction is given during supervision, including guidance on investigation plans, assessing risk and reviewing the progress of investigations, there is a lack of clarity and scrutiny. As a result the force guidance is often not followed.

This has led to victims of crime being given an unacceptable service, which is a cause of concern.

## Areas for improvement

### **While the force has recently changed its induction training programme, it needs to review and refresh the training it gives to its call takers**

This would make sure victims of crime are offered appropriate advice on preserving evidence and crime prevention. Supervisors need to carry out regular audits to check this is being done.

### **The force doesn't always give victims of crime appropriate advice on preserving evidence or crime prevention**

This means that evidence could be lost, and more crimes committed. This could prevent victims, some of whom remain vulnerable, from getting a successful result.

### **The force should review whether the absence of specified response times in its graded response policy is appropriate**

It should make sure that it understands how well it responds to calls for service, including the timeliness of that response. Furthermore, it should review the systems that manage the risks faced by victims of crime. The force's graded response policy has six levels of response with no associated target response times. Mostly, the policy is accurately applied. The second tier of response is 'prompt'. We found several examples where 'prompt' graded calls were not allocated resources within an acceptable time. It took up to 48 hours to allocate resources to some incidents. These delays will undoubtedly affect victims and may lead to opportunities to collect evidence being missed. This leaves the victims exposed to further risks and, potentially, offenders committing more crimes.

### **The force should review the role of supervisors in the control room to make sure quality assurance, risk identification and resourcing are of a consistently acceptable standard**

We found inconsistency in the role of supervisors in the control room and a lack of quality assurance checks taking place.

**The force should review its processes to make sure crimes are recorded, allocated and investigated in good time and comply with [National Crime Recording Standards \(NCRS\)](#)**

There are unacceptable delays in the initial stages of crime recording, including crime screening decisions, allocation processes and crimes not being recorded within 24 hours on too many occasions. These delays affect the time some investigations take, leaving some victims with no contact for considerable periods.

Vulnerability is not always considered and identified correctly at the initial point of contact in the control room. This means some victims don't get the appropriate initial response during the investigation. The force needs to understand why there are delays between a crime being reported and recording, screening and a subsequent investigation. These need to be improved to better meet victims' needs, particularly the needs of victims who are vulnerable.

**The force should make sure that effective investigation plans are created where relevant. And supervisory oversight must ensure that the force identifies all investigative opportunities and carries out proportionate investigations**

There was an effective investigation in 52 of the 70 cases we reviewed. Overall, most investigations had been allocated to appropriate teams. But in most of the cases we reviewed, there was a delay to starting investigations and not all of them were carried out in good time. We found that investigating officers or supervisors didn't always record the reasons for these delays. And the force didn't contact some victims for considerable periods. Delays in investigations may result in evidence being lost, a failure to bring offenders to justice, further offending, and victims being let down and becoming less engaged.

We found evidence of investigation plans in 26 of the 40 cases we reviewed in which we would expect to see a plan. Entries in the enquiry log showed either no plan at all, a brief account of the circumstances, or a list of what had been done but no record of what enquiries were outstanding. Where present, the investigation plans were rarely completed by supervisors. Most were created by the investigating officers, and lacked involvement from a supervisor in both their creation and review.

The lack of investigation plans was often made worse by a lack of supervision of investigations. We found that supervision was evident in 34 out of the 55 cases we reviewed. Even in cases that had some supervision, we found that often not enough direction, guidance or advice was given during investigations.

## **The force needs to make sure that it complies with the requirements of the Code of Practice for Victims of Crime**

Gloucestershire Constabulary complied with the [Code of Practice for Victims of Crime](#) (VCOP) agreed levels of victim contact in some cases. We found that the VCOP and agreed levels of victim contact were followed in 39 out of the 50 cases we reviewed. Not contacting a victim enough can lead to them becoming less engaged with investigations, not supporting prosecutions and losing faith in the criminal justice process.

The force should make sure that:

- it understands the reasons for the high number of victims refusing or declining to provide victim personal statements;
- these statements are considered in all relevant investigations; and
- when these statements aren't taken, there is an auditable record explaining why.

## **The force needs to take every opportunity to pursue offenders when victims disengage or fail to support prosecutions, or take other preventive measures. For example, domestic violence protection notices (DVPNs) or domestic violence protection orders (DVPOs)**

The force doesn't take every opportunity to pursue offenders when victims disengage or fail to support prosecutions. Of the four cases we identified with opportunities to progress prosecutions without the support of victims, only one was considered.

## **The force needs to put in place appropriate governance and monitoring processes for the use and application of crime investigation outcomes. Leaders need to make sure the use of outcomes is appropriate and complies with force and national policies**

There is an absence of effective leadership and governance to make sure the use of outcomes is appropriate and complies with force and national policies. We found a lack of oversight from [senior officers](#) of the use of outcomes in a governance setting. This appears to be because of limited auditing. The force has a policy for the use and application of specific outcomes relating to prosecutions. But this isn't consistently followed, particularly when gathering and documenting the views of victims. This indicates that police officers may be choosing to close cases even when there is enough evidence to warrant prosecution, and that supervisors aren't challenging these decisions enough.

The only outcome type regularly scrutinised at the performance meeting appears to be outcome 15. (Named Suspect identified: the crime is confirmed and the victim supports police action but evidential difficulties prevent further action.)

A force internal review on the use of penalty notices for disorder showed that only 53 percent were correct, and there was a lack of supervision. Some offence types weren't suitable, and several offenders weren't suitable for a penalty notice. Despite this finding, the force hasn't taken the necessary actions to address these problems.

### **The force should make sure it improves how it collects diversity information from crime victims**

The force should make sure it uses this to inform its compliance with its equality duty. The force's data for victims of crime shows that age and gender are well recorded. But other [protected characteristics](#) (ethnicity, disability and sexual orientation) are not. The force should be collecting this information. It would help it to understand the extent to which each protected group is affected by crime and how this differs from the experiences of those without protected characteristics. This would tell the force whether it needs to respond to some victims in a different way.

## **Main findings**

In this section, we set out our main findings that relate to how well the force provides a service to victims of crime.

### **The role of call handlers is to correctly record the details of all calls. They must use, and correctly record, a structured initial triage and risk assessment, to find out how to prioritise each call. This makes sure that each caller is given the most appropriate response**

We found that, overall, the standard of call handling is poor. In addition to the occasions when an enhanced THRIVE assessment was not used, there were some instances where the threat, harm and risk were not fully considered, and victims didn't receive the correct response.

Force policy states that the victim needs assessment should be completed by the control room or the first officer to attend an incident. Of the cases where this should have been done, the assessment was rarely carried out. And there was little evidence of the first officers to respond carrying out this assessment.

There was also evidence that call takers didn't always carry out checks to establish whether the caller was a repeat victim. These checks were only completed in 33 of the 87 incidents we reviewed. In the 30 incidents where it was established that the caller was a repeat victim, the information was only recorded on 13 occasions. This means that callers who are repeat victims of crime may not receive the appropriate levels of service or the response required. And the force may not identify every opportunity it has to reduce repeat victimisation.

Vulnerability was not always considered and identified correctly, so vulnerable victims didn't always get the appropriate response. In the 87 cases we reviewed where there was evidence of vulnerability, this was only considered on 50 occasions. And in the 42 cases we reviewed where the victim was identified as vulnerable, this information was only recorded on 22 occasions.

We found that, in most cases, the way in which calls for service were prioritised and responded to were appropriate to the nature of each call and the details that had been recorded for the incident. But the lack of a consistent and structured risk assessment

process means that prioritisation and response were not always based on a thorough assessment of the caller's needs.

**Victims' views are not appropriately recorded and crime investigations are not being progressed when they should be**

We reviewed case files that had been finalised as outcome 16 (where the victim does not support police action). We found that, based on the information recorded, this was appropriate in most cases (16 out of the 19 we reviewed). In cases deemed suitable to be closed under this outcome, there was no indication or documented reason why the victim had withdrawn their support. And there was no clear explanation of why the case couldn't have been pursued. These cases highlight a lack of effective supervision.

# Engaging with and treating the public with fairness and respect

Good

Gloucestershire Constabulary is good at treating people fairly and with respect.

## Innovative practice

The force is improving its compliance with the [National Police Chiefs' Council](#) (NPCC) Use of Force recording requirements. It is doing this by:

- educating officers and staff;
- making sure as many use of force (UoF) forms are completed as possible by mandating the need to complete them and tackling the problems that stop staff from completing them; and
- analysing the data recorded and using the information to learn lessons.

The force has introduced a new process which generates an automatic email from its custody system. The email is sent to all arresting officers when force has been used on a person, reminding them to complete a UoF form.

Early indications show that the number of UoF incidents reported has increased. The force told us that there were 555 reports in May 2021, compared to an average of around 40 forms submitted each month in 2019. If current rates of reporting continue, then the force predicts that the total number of UoF incidents reported in the next 12 months will be around 6,660. This brings UoF reporting above the arrest rate, which was 4,961 arrests in the year ending 31 March 2020.

Arrest rates can be used as a benchmark to understand the degree to which UoF is reported or under-reported. This is because most arrests will involve some degree of force. The similarity in the two sets of figures suggests better and more accurate levels of UoF recording.

The force has introduced a reverse mentoring scheme for staff from different backgrounds to work with senior leaders. The aim is for senior staff to improve their understanding and awareness of [unconscious bias](#) by listening to people's personal experiences. The aim is for them to then incorporate what they have learned into their strategic decision-making and promote diversity awareness throughout the organisation.

## Main findings

In this section, we set out our main findings that relate to treating people fairly and with respect.

### **The force engages with all its diverse communities to understand and respond to what matters to them**

The force has set up a community legitimacy panel. It includes a cross-section of community representatives and is chaired by a member of the public from a minority ethnic background.

The panel acts as a 'critical friend', advising, challenging and offering the force constructive feedback on its policies, procedures and activities.

Members review incidents and information to better understand the activities that they feel have the potential to cause distrust and a lack of confidence in policing. These include:

- reporting, and response to, hate crimes;
- legitimate use of use of force and stop and search;
- neighbourhood officers' engagement with communities;
- work to help bring communities together, particularly with vulnerable and young people; and
- assessing responses to complaints.

This has given the force an opportunity to work with, and build stronger relationships with, its communities that are harder to reach. These include Black and Minority Ethnic groups, lesbian, gay, bisexual and transgender groups, people with mental health problems and some groups of young people.

This work supports the force's 'Better Together' approach to diversity, equality and inclusion.

### **The force works with third sector organisations, to identify and include all its varied communities**

Third sector organisations are defined as being from neither the public nor the private sector. Often voluntary and non-profit organisations, their aim is to make a positive difference to society.

The Boost Gloucestershire Strategic Business Plan 2021/22 is a partnership between police, the [police and crime commissioner](#), parents, education and outreach groups, and other organisations.

The plan includes a child leadership programme which the force is looking to introduce in schools. The focus is on encouraging young people to work together to improve their empathy, compassion, resilience, mental health and leadership skills. The aim is to give them the best chance of living good lives, and to ultimately reduce the strain on local services.

The force has also seconded three police community support officer (PCSO) community builders to Barnwood Trust. This charity aims to create the best possible environment in Gloucestershire for disabled people and people with mental health problems, to help them achieve success in their lives.

The force has a volunteer police cadet (VPC) programme. There are currently 78 cadets, supported by 50 cadet leaders, in four local policing areas. This includes people with vulnerabilities from Kingfisher Treasure Seekers, an organisation that offers people with disabilities or mental health concerns support and training to help them achieve their ambitions. There is a 12-month plan to expand the cadet programme to cover each of the force's six local policing areas by the end of 2021.

The force is also considering including Mini Police, Junior Wardens and work experience schemes within the cadet programme. The aim is to help young people better understand policing and the effect crime and anti-social behaviour has on communities.

The force encourages the use of volunteers. At 31 March 2020 it had 358 police support volunteers (PSVs) spread across 30 roles. We were told that the force uses the volunteer scheme to develop new and innovative volunteer opportunities. This helps the force improve the service it offers, gives it extra capacity and resilience, and adds value through the professional service volunteers offer. The force is looking to create more volunteer roles which it is hoped will provide the dual benefit of helping the force meet its business needs and demand, while also providing value to the people who give their time. It wants to build on PSV training and development to help promote their skills, knowledge and experiences to potential and current employers.

### **The force understands and improves the way it uses stop and search powers**

The force gives training on stop and search.

When the force identifies poor practice, it addresses this in officer feedback and training. This is done with support from the community legitimacy panel, which informs the force of the effect of its actions on the community, and suggests ways to improve.

The internal force stop and search governance panel meets quarterly and examines a range of stop and search data. This helps the force identify patterns in the use of [stop and search powers](#) by individual officers or specific teams.

Supervisors are expected to maintain oversight of stop searches by checking officers' [body-worn video](#) (BWV). But the force is aware that this practice is inconsistent and only appears to take place when there is a link to a complaint or other event.

The force's data monitoring of stop and search is available internally on a scorecard which covers the main areas of activity. This includes the grounds recorded for the search, [find rates](#) and ethnicity. The force is fully aware that people from certain ethnic minority backgrounds face disproportionately more stop searches, and has completed some analysis on this, which is published on its website. While it is yet to publish its internal stop and search governance minutes and stop and search data and information, the force has added a link on its website to the data held on the national stop and search database by Police.uk.

In 2019/20, the force carried out 2,317 stop searches, which was 20 percent more than in 2018/19. We reviewed a representative sample of records to assess how reasonable the grounds were, as recorded by the searching officer. Of our sample of 178 stop searches carried out between 1 January and 31 December 2020, 84 percent had reasonable grounds. More supervision of stop and search forms would help make sure reasonable grounds are recorded for every stop search.

The force holds a monthly stop and search community scrutiny panel (SSCSP). It is chaired by an independent member of the public and a member of the Gloucestershire [independent advisory group](#) sits on the panel. The panel randomly selects several stop searches each month and panel members focus on themes such as ethnicity, type of search or age, or the grounds for each search. Those of concern are addressed by a dedicated stop and search sergeant, who provides feedback to individual officers and their supervisors about any lessons that can be learned.

A vetted member of the SSCSP also scrutinises BWV footage every month, and reports back to the other members. The force should ensure that supervisors routinely examine a random selection of officers' BWV footage. This will help them to check for any evidence of inappropriate or biased behaviour.

# Preventing crime and anti-social behaviour

Good

Gloucestershire Constabulary is good at prevention and deterrence.

## Area for improvement

**The force should review how it directs frontline neighbourhood staff, to make sure they are properly deployed**

The force has a problem-solving culture. But problem solving is used inconsistently across areas and teams, as is its supervision. This undermines the force's approach to preventing and deterring crime and anti-social behaviour. It also affects the force's ability to accurately examine its own performance, which it needs to do to inform future activity.

## Main findings

In this section, we set out our main findings that relate to crime prevention and deterrence.

**The force focuses on prevention activity to tackle crime, incidents and vulnerability. It assesses its activities against force priorities through force and local performance meetings, and tactical tasking and co-ordinating group meetings**

The force's crime prevention strategy sets out its intention to prevent crime and anti-social behaviour, protect the most vulnerable, reduce harm and to work with other organisations to help achieve these aims.

The force has a clear meeting and governance structure in place. This includes twice-daily management meetings, together with regular meetings where teams throughout the force co-ordinate work, set tasks and agree resourcing. It is at these meetings that anti-social behaviour and local policing are reviewed, with the intention of focusing on deterrence at the earliest opportunity.

## **The force complies with the College of Policing's neighbourhood policing guidelines, and has good governance**

The force's neighbourhood policing structure complies with the College of Policing's neighbourhood policing guidelines. And it has good governance arrangements.

It has a delivery plan and works well with other organisations. The current operating model was described as the force's 'first step' to understanding demand. However, neighbourhood officers are used in other areas such as the local police investigation hub to deal with the backlog of investigations, taking them away from their main role. The force has adopted the NPCC crime prevention strategy, set in 2017.

Neighbourhood policing is at the heart of the police and crime plan. And officers, [staff](#) and volunteers are aware of the chief constable's vision that 'policing begins and ends in neighbourhoods'.

The force uses a neighbourhood community vehicle and a community engagement vehicle to make the force more accessible to local communities. The vehicles also act as a visible crime and disorder deterrent.

## **The force directs frontline neighbourhood staff to make sure that they are effectively deployed**

Most of the time, we found that frontline neighbourhood staff are deployed to areas where they can work with communities, offering reassurance and building confidence in the force.

The force uses the OSARA approach to problem solving. This model has five stages:

- Objective
- Scanning
- Analysis
- Response
- Assessment.

But we found that some staff use a different problem-solving policing approach, which can lead to inconsistency and some confusion.

[Neighbourhood policing teams](#) mainly use OSARA. Staff have had training in evidence-based problem solving and apply this to problem-solving plans. But we found that the level of detail within plans, and the application of the model, were inconsistent.

There is little evidence of other staff or departments using the OSARA problem-solving approach.

On My Patch is an IT system which records information which is used to inform local management meetings and processes. It is mainly used by neighbourhood officers to record and review updates from their local areas. Data on the system relates to area demographics, schools, local councillors and other local information. But we found that this system is used inconsistently throughout the force and by individual teams.

Supervision of OSARA plans is inconsistent at all levels. And there is often only scrutiny after a significant incident or event. The force doesn't use predictive software or techniques on which it can build an appropriate evidence-based policing response.

Officers use a separate standalone system to update problem-solving plans.

Some local policing team (LPT) officers are unaware of the neighbourhood policing staff appointed to areas, which can lead to an unco-ordinated approach to problem solving and a possible duplication of work.

### **The force understands the strengths and needs of local communities, and is helping to build resilience and unity**

The force has dedicated local policing teams, with named PCSOs for each area. Some officers support the policing of towns and cities at night and local policing teams help when needed. This is likely to take them away from their main neighbourhood roles.

There is a strong emphasis on citizens in policing. This is the term used to describe the volunteers that support the police. Special constabulary officers often support policing campaigns, and many other volunteers work throughout the force.

Of note, we found that the force has recruited cadets, some of whom are vulnerable or have significant additional needs. They are encouraged and supported, with help from the Kingfisher Treasure Seekers organisation.

Working with Gloucester City Council, the force is taking part in activities to help to build strong communities. Staff from neighbourhood teams are involved in the Aston Project, working with young people from families who have links to anti-social behaviour. The aim is to encourage these young people to take part in community activities and divert them from negative influences.

### **The force values successful neighbourhood policing. It rewards officers, staff and volunteers who make effective contributions**

Rewards and recognition extend to all levels within the organisation. And the force supports staff and officers to achieve external awards. These include the:

- Tilley Awards, which celebrate problem-orientated projects that help to resolve problems faced by the police, communities and other organisations; and
- High Sheriff's Awards, which recognise valuable services to the community.

Good work is acknowledged in the daily management meetings, and by senior managers. The force also issues Commander Awards for more significant achievements.

The force has been recognised nationally for its intervention and prevention work with young people. This includes its involvement with the Aston Project, referred to above.

# Responding to the public

## Inadequate

Gloucestershire Constabulary is inadequate at responding to the public.

### Areas for improvement

**The force should improve the way it identifies and understands risk at initial contact. This should be done through conducting consistent risk assessments, using experts more effectively, and answering all calls promptly. This will mean that all victims receive a consistent level of service and support, which is well prioritised and quick**

The force control room faces several challenges which are affecting the way it deals with calls. Willing and empathetic staff are hampered by out of date IT systems, unclear policies, and insufficient support and guidance from experts.

There is a lack of structured supervisory review. This is made worse by the fact that there are too many incidents and crimes waiting for police attendance. Sometimes it takes days for police to attend. This means staff and supervisors are often trying to re-assess the risks posed by incidents still under investigation and trying to deploy resources when, too often, they are not available, or victims have since become harder to trace or contact.

At the time of our inspection, the force hoped to reintroduce an appointments system for appropriate cases in September 2021. This should ease some of this pressure, and address the threat and risk that control room operators feel they are solely responsible for managing.

**The force needs to introduce a clearly defined process of real time re-assessment of threat, harm and risk of incidents that are waiting for a police response, particularly to vulnerable and repeat victims. This would mean that these incidents can be consistently prioritised**

The force needs to improve the way it assesses and prioritises its response to the incidents held in control room queues. This should be done according to the level of threat presented to vulnerable victims. The current strategy does not indicate how this will be addressed.

**The force has plans to replace some of the old IT systems in the control room. A failure to prioritise an upgrade to the force's systems will continue to expose it to critical risks in relation to the service it provides to the public. It is also essential that the force carries out a full review of both force policies and the training programme for control room staff**

Although staff can access enough information from the old IT systems, these systems are not integrated, are slow to process information and sometimes fail altogether. Staff told us such failures can happen several times a week. For example, the software intended to show officer locations (to allocate calls more efficiently and ensure officer safety) was described as inaccurate and unusable. And specific guidance documents for some crime types were not being used because they took too long to load and were not user friendly.

Added to which, the 101 system, used for non-emergency calls, has no automation or triage facility. The force can generally answer these calls within a reasonable time, but calls can remain unanswered for more than 30 minutes during busier times. Callers don't know where they are in a queue or how long it will be before their call is answered. The force has no way of prioritising the most vulnerable callers in this queue.

A review of 101 calls ahead of our on-site inspection revealed that these were being abandoned 30 percent of the time. Another on-site review indicated this had reduced a little, to 27 percent.

The force is soon to introduce upgrades that will offer:

- a more efficient automated 101 service;
- the ability to schedule appointments;
- better identification of vulnerable victims;
- reliable systems with accurate mapping; and
- improved guidance for call handlers.

This will give call handlers more confidence in giving crime scene preservation and forensic advice.

As well as needing better IT, force policies should be clearer and planned improvements to training and supervision need to happen more quickly. New staff are given relevant and comprehensive training. But staff who have been in the force longer have had little training recently, especially in the areas of vulnerability, seldom heard victims and hidden harm. 'Seldom heard' refers to people who are under-represented in society, who may be less likely to engage with police. This may be because of race, religion, deprivation, mental ill health, sexuality or geographical isolation, for example.

1-2-1s with supervisors are held inconsistently, annual development reviews are not being done and supervisors are not regularly listening in to or assessing calls in line with national call handling standards. This support is important as there is already a lack of expert advice available to call handlers.

There is no formal mental health provision, out-of-hours support from staff trained in intelligence is limited, and call handlers don't have access to updated or thorough signposting or guidance documents. Some of the staff we spoke to commented that they 'feel they have to be experts in everything'.

The force uses the structured risk assessment process called THRIVE+. This process helps call handlers to identify vulnerable victims and prioritise and reduce the threats they face. But this process is used inconsistently. Some staff use a drop-down menu, while others use free text to record the information they gather. When call handlers record the information they gather, the assessments they then make based upon this should be more detailed and meaningful. The use of THRIVE+ was not being audited by supervisors. So the force can't be confident that it is identifying and managing all risk and identifying and safeguarding all vulnerable people.

**The force should better understand the demand on its officers to respond to calls for service. And it should better manage its resources to cope with that demand**

In the force control room, there are too many calls in the queue waiting for officers to attend. The force has tried to reduce the number of calls in the queue, but this has resulted in control room staff feeling they are carrying all the risk. Added to which, their ability to prioritise calls is limited by the volume.

The force's new operating model has incorporated local investigation teams into the response teams. There is now an imbalance between the officers who are available to attend calls and those who are only available to work on enquiries into crimes. This means that sometimes crimes are not responded to as quickly as they should be. More adjustments to the operating model are needed to make sure there are enough staff available to respond to calls from the public.

The force has a daily management meeting where incidents and resourcing are discussed. This enables staff to be moved to different teams and areas of the organisation to help when there are serious crimes or complex incidents. It was reported that such movements happen almost daily. But contingency planning relating to a graded assessment of demands is only used for major events, such as the Cheltenham Festival. This doesn't take into account the regular imbalance of demand between urban and rural areas.

Senior leaders recognise the imbalance between the response to urban and rural calls. Currently the number of officers available to attend urban calls is not sufficient to meet demand. To address this the force plans to recruit another 25 officers in urban areas.

## Main findings

In this section we set out our main findings that relate to how well the force responds to the public.

### **Staff wellbeing is balanced with public and organisational needs**

The force has recognised that staff development and wellbeing are fundamental not only to feelings of job satisfaction, but also to providing an efficient control room service.

It was encouraging that the staff we met were generally positive about their environment and their role. It was clear that they gained real satisfaction from helping the public. But they were frustrated by difficulties in assigning incidents and having to work with outdated IT.

The senior leadership team recognises these obstacles to efficiency. A business case has been made for extra control room staff. This case is supported by data which indicates whether calls are being handled appropriately and in good time.

Overtime is needed regularly, but staff are not forced to work it and forward planning is in place to manage it.

Staff are able to work flexibly and there is a new appeals process for exceptional leave requests. Wellbeing provisions include access to [trauma risk management \(TRiM\)](#), a trauma-focused peer support system designed to help people who have experienced a traumatic event, [occupational health services](#), and a contemplation/faith room. Supervisors were described by their staff as approachable and supportive.

The force balances the needs of the public with a healthy work environment. The force keeps staff and builds expertise in the control room, an area that traditionally has high staff turnover. The proportion of the workforce leaving Gloucestershire Constabulary in the year ending March 2020 was 11 percent for police staff and 9 percent for the overall workforce.

An updated training programme is underway to help improve how the force manages its contact with the public. This includes tabletop exercises, face-to-face training and team building. This is encouraging, but specific needs have to be prioritised and a greater focus must be placed on recognising and addressing victim vulnerability.

Offering more opportunities for staff and officers to complete professional qualifications, and access to talent management programmes to enhance their skills and provide them with more opportunities within the organisation, will also be important to build on these positive steps.

### **It is getting easier for the public to contact the force through a range of channels, which the force is encouraging**

The force uses an IT platform called Single Online Home. This is a web-based online tool that allows members of the public to report a full range of crimes and incidents. There is also a specific reporting portal for rural and animal crimes, which are a particular concern for the community.

The force is hoping that using this nationally-endorsed platform will reduce the demand for officers to attend incidents. To reinforce this, the force regularly promotes the various ways that the public can make contact, including through online forms. The latest publicity campaign is called Click, Call, Connect, which highlights how easy it is for people to contact the force when they need to.

The force receives emails from the public. These are mainly managed by community contact advisers who work in reception areas. They quickly identify when incidents need police attendance and they make sure that reports featuring risks are sent to the control room. After 8pm, emails are managed in the control room. During this time the force needs to make sure that it has a robust assessment process in place. Understandably, more urgent calls are prioritised. So some risks remain when other methods for reporting crime are not reviewed for effectiveness or assessed for risk.

The force does give advice to the public on the use of email as a means of contact. But we were given several examples of email contacts where risks had been missed.

# Investigating crime

## Inadequate

Gloucestershire Constabulary is inadequate at investigating crime.

### Cause of concern

Gloucestershire Constabulary is unable to manage current demand effectively. It doesn't have enough capacity or capability to respond to calls effectively, or to investigate crime as well as it should. Too often, this is affecting the service it offers.

The force is failing to respond appropriately to some vulnerable people. This means it is missing some opportunities to safeguard victims and secure evidence.

To address this cause of concern, we recommend that within 12 months the force should:

- improve the effectiveness of its initial response to incidents;
- improve the effectiveness of its investigations;
- make sure senior officers effectively supervise crime investigations, and standards;
- make sure all crimes are allocated quickly to investigators with the appropriate skills, accreditation and support. They will then be able to investigate them to a good standard, and promptly; and
- make sure each investigation fully complies with the Code of Practice for Victims of Crime.

### Areas for improvement

The force has a governance process called Investigative Excellence (strategy, policy and accountability). But because of the response to the pandemic, and other pressures, this governance process has not yet developed into the effective programme intended. Once developed, it should help leaders to solve problems of capacity, capability and standards within investigations.

The force should clearly set out its aims and objectives, with an overarching plan and governance. It should make sure that senior supervisors frequently check the quality of investigations, using a process that can be audited.

**The force does not fully understand the demand on its services**

To address this, it must put in place an effective and efficient process immediately to make sure it can accurately record crime.

**Leaders do not fully understand the skills and capabilities needed to meet both current and future demand. This means that they are not able to use this information to inform their plans for central resource allocation or training**

The force should review the skills of its workforce and its capacity so that it can identify where there are gaps, specifically in roles that need enhanced levels of specialist training. It should aim to make sure that it has an acceptable number of suitably trained staff.

**The force does not consistently carry out thorough investigations that lead to satisfactory results for victims**

The force should make sure that every investigation has a plan. Supervising officers should be involved in developing these plans and for outlining the objective in each investigation. They should then provide detailed and meaningful direction throughout. Supervisors must be made aware of the importance of this. The force should also introduce a quality assurance process to show that it is meeting this requirement.

The force should make sure that it is only supervisors who can decide when to close those investigations where evidence exists that could support an evidence-led prosecution. Such supervisors must have an appropriate level of training or experience relating to the type of investigation. And they must provide a rationale to support their decision.

**Officer workloads and working hours have increased and many are struggling to keep up with this demand. This means that the force is not currently balancing demand with its obligation to look after its staff and officers**

The force should review its operating model to make sure that officers and staff in all departments have an appropriate and manageable number of investigations, and that they are able to provide a good service to victims and to conduct their enquiries with speed and efficiency.

## Main findings

In this section, we set out our main findings that relate to how well the force investigates crime.

**The force does not have effective governance (strategy, policy and accountability) to be able to solve the problems it has with capacity, capability and standards. It needs to address this gap in governance if it is to be able to carry out good quality investigations and offer victims a good service**

The force recognises that the way that it investigates crime needs to be improved. It has recently developed and implemented an investigation model that is supported by guidance that sets out investigative expectations, aimed at improving the overall standard of its investigations.

To help achieve the force's aims and goals it has also introduced an investigative excellence delivery board and improvement plan.

Unfortunately, we found that these measures, although comprehensive, are not yet resulting in clear aims, plans or objectives that make sure staff carry out good quality investigations. There is more work to be done for this to be achieved.

**The force does not fully understand the demand for its services**

The force does not fully understand the crime demand it faces and our victim service assessment (see Question 1) has shown that not all crimes in Gloucestershire are being recorded. This means that the force does not know the capacity or capability it needs to meet this demand. We found that most teams we spoke to were under significant pressure from managing high volumes of crime investigations. This situation is likely to get worse when crime recording performance is improved and all crimes are correctly identified and recorded. Further demand will be created as the force addresses incomplete pre-charge [disclosure](#) procedures (known as DG6) and improves VCOP compliance. The situation will also be exacerbated as COVID restrictions are lifted and demand returns to anticipated pre-pandemic levels.

Crime allocation decisions are sometimes based on demand, rather than on the right resource with the right training and skills. The force provides its investigators with good [digital forensics](#) support with minimal delay. There are often delays to investigations for other reasons. Examples include crimes being poorly allocated, a lack of supervision and increased demands from CPS, especially in relation to pre-charge disclosure requirements. Overall, this results in victims of crime getting a poor service.

We found a lack of understanding at all levels about the results of cases, and how such information could be used to improve services and reduce victim attrition rates (where victims decide, or in some instances are encouraged, not to support a prosecution).

Results for domestic abuse cases are of particular concern: data for domestic abuse offences recorded in the year ending 31 March 2020 indicates that 77 percent of

cases were closed because of problems with evidence or victims withdrawing support for prosecutions.

As part of its new operating model, the force has created a local policing investigation hub. However, it is often under-resourced, and staff from other, often specialist, departments are required to support the team. Some staff across the organisation have reported that they are no longer confident in their ability to deal with detainees or to complete criminal justice files to a high standard.

**Leaders do not fully understand the skills and capabilities needed to meet both current and future demand. This means that they are not able to use this information to inform plans that allocate central resources and arrange training**

We found that a lack of training and continuous professional development among staff and officers is affecting their ability to do their jobs. For example, there were not enough staff trained in Achieving Best Evidence to cope with demand. This particularly affects investigations involving child victims and child witnesses.

During our inspection, we found that the child abuse investigation team only had two accredited [specialist child abuse investigation development programme](#) (SCAIDP) officers. This is out of a total of 15 officers working in the child abuse investigation team. This is significantly below the number of SCAIDP-trained officers needed on the unit. These gaps had been highlighted to senior leaders well before critical levels were reached, but no action was taken; succession planning wasn't linked to future demand or a training needs analysis. It is understood that the COVID pandemic has had an effect on planned and continuous training, including SCAIDP and other specialist courses.

The force recognises that it does not have enough accredited Professionalising the Investigative Process (PIP) officers, and that this affects the quality of service it gives the public. The lack of capabilities in specialist departments is making this problem worse. Similarly, there are not enough staff with the experience or capacity to mentor new detectives. A long-term, focused and detailed plan is needed to address these gaps, once the force has a clear understanding of demand.

**The force does not consistently conduct thorough investigations that lead to satisfactory results for victims**

There is a common view within the force that evidence-led prosecutions are not worth attempting, as the CPS is said not to support them. This has created a culture of filing crimes as soon as a victim withdraws a complaint. We found examples where this happened even when there were still opportunities to gather evidence. What is making this problem worse is that the reason for the withdrawal is not recorded, which makes analysing the result, or taking action to improve matters, almost impossible.

Of note, we found that the supervision of investigations is sporadic. This is mainly due to a lack of understanding of policy and guidance. Poor ownership and insufficient direction from supervisors also contributed to the lack of consistent, thorough investigations.

Supervisors are struggling to meet the demands placed on them. They are unclear about their role regarding the supervision of investigations, including the development of investigation plans and checking on VCOP compliance. This is causing some supervisors to prioritise other areas, leaving some investigations unsupervised.

We found evidence of supervision in only 34 of the 55 cases we reviewed. Even those cases that were supervised often lacked direction, guidance or advice. Investigators expressed the wish for more supervisor reviews and more support to help them do their job. Some first line supervisors, such as sergeants who are new to the role or have recently been promoted, don't have the breadth of skills or experience to review completed investigations.

In order to identify vulnerability, the force uses a [vulnerability identification screening tool](#) (VIST). We comment on this in more detail in the 'protecting vulnerable people' question below. We identified incidents of hidden crime and hidden demand which had been recorded on VIST where no correlating crime record had been created. As a result a thorough and satisfactory investigation hadn't been completed. This means that some of the most vulnerable victims have not received the level of service they should expect.

The use of investigation plans is inconsistent, and applied in various ways in different areas and teams. Of the 70 cases we reviewed, 52 were considered to have been investigated effectively. Similarly, when a crime is reported, in nearly all cases, we found that the victim needs assessment that should be completed at the time of the call, was not completed (only four out of 44).

Special measures, which are a series of provisions to help vulnerable and intimidated witnesses give their best evidence in court, were not considered in some of the cases we reviewed. Consequently, victims could become less engaged with investigations, may not support prosecutions, and could lose faith in the criminal justice process. Ultimately, this can cause cases to fail.

But it was noted that in some of the specialist teams within public protection, where capability and capacity are more carefully monitored, complex investigations to protect some of the most vulnerable people were better. We found that these investigations consistently used supervisor reviews, investigation plans and victim updates.

**Officer workloads and working hours have increased and many are struggling to keep up with this demand. And the force is not balancing demand with its obligations to look after its staff and officers**

The force prioritises wellbeing, but this is mainly in reaction to demand-related stress. Officers throughout the force told us that they had higher workloads since the introduction of a new operating model, and because of this their ability to improve how they investigate became limited. This affects the quality of service the public receive and investigator satisfaction.

The only way investigator wellbeing will improve is when the force fully understands the capacity and capability needed to meet its investigation demand.

# Protecting vulnerable people

## Inadequate

Gloucestershire Constabulary is inadequate at [protecting vulnerable people](#).

### Area for improvement

The force should review its crime identification and safeguarding processes to make sure that:

- all reported crimes are recorded, and comply with national crime recording standards;
- it develops effective assurance frameworks to monitor crime recording standards, which translate into improvements; and
- information on MASH reviews is as detailed as possible and doesn't rely solely on what officers at the scene provide.

Since 2016, Gloucestershire Constabulary has mainly used the vulnerability identification screening tool (VIST) to identify vulnerability. VIST highlights and records vulnerability, so appropriate and prompt safeguarding and protective work can be done. Officers complete VISTs after attending an incident, and these are submitted to the MASH. The MASH team reviews all VISTs for risks highlighted and completes the safeguarding work needed. This includes sharing information with relevant organisations within the target time of 48 hours.

An increase in VIST submissions, alongside a change in recording practices, led to a backlog in uploading VISTs to the main force crime system. While the force acknowledged that there might be information in VIST forms awaiting upload, which could affect the approach officers attending incidents involving repeat victims take, it viewed the backlog as an administrative matter.

During a visit made by inspectors to the Gloucester MASH, we observed the submission and management of VISTs. The backlog had continued to increase from around 8,000 in November 2020 to around 14,000 in May 2021.

We reviewed 36 VISTS, the oldest of which dated back to February 2019. All were classified by the force as low risk. Within this sample, we found 14 cases where crimes had been identified and not recorded, or victims hadn't been safeguarded at the earliest opportunity using methods such as arrest, bail or protective orders. Most cases we reviewed were incidents involving domestic abuse.

We also reviewed a small sample of VISTS that had already been uploaded to UNIFI and were no longer in the backlog list. Three of the four we reviewed included details in the VIST or associated STORM log that should have led to a crime being recorded, but this had not been done.

Several concerns were highlighted from this review:

- There does not seem to be a process in place for the force to assure itself that all crimes reported are being recorded.
- While there is an expectation that attending officers record crimes, this is not happening in all cases. It is unclear whether this is due to a lack of awareness of the process, a lack of awareness of crime identification or an avoidance of crime recording due to already high workloads.
- There appears to be a lack of governance or assurance in place to understand the proportion of missed crimes to support improvements in recording.
- MASH staff do not review VISTS in conjunction with the force command and control system, STORM or UNIFI crime recording system records. As a result, they don't act as a safety net for missed crimes. Therefore referrals to other safeguarding organisations may not be being made with the most complete set of information available.

If MASH staff were to carry out such a review, it would be likely to place significant additional demands on an already over-stretched team. Current operating procedures don't state that such a review is a MASH responsibility.

At present there is no rigorous process in place for the force to assure itself that information held on VISTS is of sufficient quality when reviewed against information held on STORM or UNIFI. Such a process could ensure that safeguarding decisions are as accurate as possible.

Our inspection findings indicate a significant number of missed crimes and missed investigation opportunities. As a result, chances to safeguard victims and prevent future offending are often missed.

### **The force should review its capacity and capability to protect vulnerable people**

In September 2020, the force introduced a new operating model and published several strategic assessments. These included assessments for domestic abuse, mental health, [missing persons](#) and child criminal exploitation (CCE). All but CCE showed an increase in reporting, particularly of high-risk incidents. These assessments have facilitated some uplift in staffing in key areas but also indicate a lack of capacity to manage demand and protect vulnerable people.

## Main findings

In this section, we set out our main findings that relate to how well the force protects vulnerable people.

### **The force has worked to increase the breadth of understanding and awareness of vulnerability throughout its workforce**

The force has worked hard to improve its understanding, governance and awareness of vulnerability throughout its workforce, but its efforts are undermined by processes that fail to identify and protect all vulnerable people. The force places emphasis on training its staff, and has given vulnerability awareness training to 1,137 members of its workforce. The training highlighted the importance of professional curiosity and the [voice of the child](#). Alongside this, the force has provided training on the effect of vulnerability on diverse groups. It has also supported staff in better understanding the effect of [adverse childhood experiences](#) on future vulnerability and offending.

The effects of this training can be seen in the continued increase in the number of VISTs completed by officers and submitted to the MASH.

The force has introduced a community legitimacy panel, which includes several members from the local community, and is chaired by a local resident. The panel looks at five areas: legitimate use of police powers; effective neighbourhood engagement; increased community cohesion with vulnerable and young people; effective reporting and response to hate crime; and police complaints. Its feedback is incorporated into the continuing development of bespoke vulnerability training.

### **The force works well with other organisations to share information. This supports a collaborative approach to reducing vulnerability, but this could be improved**

There were good examples of collaborative working to reduce the number of people who become victims. For example, the force works with the Aston Project, which works with children aged between 9 and 17 years with families who have links to anti-social behaviour or negative influences. The project focuses on diverting these young people away from criminal activity by inspiring them to take part in community activities, and to make better life decisions.

The force also takes part in daily multi-agency domestic abuse meetings. The process allows a joint understanding of risk, which means decisions about the safeguarding work needed can be made promptly. This includes, for example, referrals to organisations that provide specialist support, and access to different investigative approaches. The process informs the multi-agency risk assessment conference (MARAC) and means that cases discussed at those meetings can be better managed, and that appropriate support can be provided at the earliest opportunity.

The force has worked with the private sector to build an IT system that helps it work with other organisations to identify people at risk of harm. It is also involved in a multi-agency response with partners to protect the 20 children identified by children's social care as being at a heightened risk of harm. This is aligned with the force's preventative approach to reducing vulnerability.

Vulnerability and safeguarding officers work in the force's neighbourhood teams. These officers help to gather information from other organisations, and they consider collaborative opportunities to reduce vulnerability. This includes areas of hidden harm, such as honour-based violence. While the purpose of the role seems beneficial, it is unclear what tangible effect it has on the reduction of vulnerability and repeat victimisation.

While we have expressed concerns that staff and officers do not fully understand the concept of cumulative risk, or its consequent effects upon accurate safeguarding referrals, MASH arrangements are well established. Staff working within the MASH have a good understanding of risk and cumulative risk, and information sharing is prompt. The force recognises that it could develop a more comprehensive view of vulnerability if it did more to gather relevant data from other organisations. But the mechanisms to achieve this are not yet in place. The force should work with other organisations to explore the mutual benefits of information sharing.

**The force has a comprehensive domestic abuse policy, which translates into positive practice, when it is used. But officers don't always follow this policy**

The force's domestic abuse policy is comprehensive and focuses on preventing harm. Its approach is to target perpetrators to reduce harm. There are clear governance structures at strategic, tactical, and operational levels, which include working with other organisations. The force also has a live domestic abuse [4P](#) action plan. This sets out the force's plan to pursue offenders, prevent offending, protect victims and prepare measures to reduce the impact of offending upon victims. The plan is reviewed quarterly and has clear ownership and accountability.

Control room grading decisions of domestic abuse incidents and VISTs are reviewed daily by the domestic abuse safeguarding team and the local specialist multi-agency domestic abuse service (GDAS). This makes sure that the incident grading is correct and that the most appropriate response is given. Investigations are then allocated to the appropriate team, which is given the correct support.

The force responds well to domestic abuse incidents, which is pleasing to see. But when we examined a sample of incidents, we found that in some cases victims were actively discouraged from pursuing a prosecution and [positive action](#) was not taken. This is reflected in the arrest rates data for the 12-month period to 30 September 2020, which was 26.3 percent. This is 3.5 percentage points lower than the England and Wales arrest rate.

**The force has improved the way it uses the powers available to it to protect domestic abuse victims when there are no opportunities to investigate. But there is still more work to do**

The force has improved its use of [domestic violence protection notices](#) (DVPNs) and orders ([DVPOs](#)), but their application remains inconsistent. In the year ending 31 March 2021, the force made an average of 7.1 DVPO applications per 1,000 domestic abuse crimes. This is slightly lower than the average application rate across all forces, which was 10.2 applications per 1,000 crimes.

There is concern that some officers may see DVPNs as an alternative to pursuing criminal action via the CPS. DVPNs should be used when there are no other legislative options available. We also found cases where DVPOs were not granted because officers did not attend contested cases at court. This affects victim safety and increases the likelihood of further offences being committed against them. The force recognises this concern and has made recent changes to the governance of the application process through the domestic abuse safeguarding team, to support improvements.

# Managing offenders and suspects

Adequate

Gloucestershire Constabulary is adequate at managing offenders and suspects.

## Area for improvement

**The force should review its sex offender management policy and practice to make sure that it routinely completes risk assessments and gathers supporting intelligence. It should make sure that risk management plans are thorough and reviewed regularly, so risks to the public are managed or reduced**

During our inspection, we reviewed 11 records to see how well the force manages registered sex offenders (RSOs) in Gloucestershire. We assessed how well it meets its policy and national guidance. We found that five cases were inadequate, two needed improvement and four were of a good standard (when measured against [Authorised Professional Practice](#), the official and most current source of policing practice). Issues included lack of Police National Database (PND) checks to support a complete picture of intelligence, lack of recorded police actions to mitigate risks, and [active risk management](#) (ARM) assessments and risk management plans (RMPs) not completed in line with national guidance timescales. Therefore, offenders may be being managed in accordance with a risk level that was established years before. The force has moved away from national good practice and it does not appear to have a robust, local, risk-based policy in place. This may mean that RSOs are increasingly managed using a demand-led, rather than a risk-led, approach. This may put the public at greater risk, because not all RSOs may be managed as much as their risk level would merit.

Force policy needs to offer clear guidance on the management of RSOs, including those managed reactively as a result of their offending behaviour. It should provide sufficient direction to staff to ensure they can adequately reduce or remove risk to the public. This should include:

- making sure PND checks are completed quickly, to reduce risk;
- ensuring that breaches are recorded in all cases; and
- setting expectations regarding the frequency of assessment of medium and low-risk offenders.

**The force should review its investment in its management of sexual or violent offenders (MOSOVO) and internet child abuse team (ICAT) resources. This will make sure it has enough capacity to manage current and future demand and remove the need for changes to operational practice that may be detrimental to the protection of the public from risk of harm**

During our inspection, we were told of backlogs in referrals awaiting action within the ICAT. Resources available at that time and the related capacity to undertake warrants did not suggest there was the ability to reduce these backlogs and manage continuing or increasing demand. There was no indication of a plan to address this.

Within the [MOSOVO](#) team we identified delays in visits for medium and low-risk offenders and overdue ARM assessments and RMPs when measured against national guidance timescales. Our review of [ViSOR](#) (Violent and Sex Offender Register) case files further highlighted this issue. There are approximately 80 cases within the MOVOSO team, which exceeds levels suggested by national best practice as reasonable. Furthermore, we found evidence of single crewed visits to RSOs being standard practice. We were told this was because there was insufficient capacity to double crew. This not only puts offender managers at risk but also reduces their ability to proactively assess offenders and to monitor their compliance with court orders.

While the force has invested positively in its digital capabilities, staff expressed concern that they did not have sufficient training in available digital triage equipment to identify breaches of orders without the support of staff from other specialist teams. However, they also recognised that current workloads did not allow for this type of proactivity to the level they felt was needed. As such there is a potential missed opportunity to effectively assess the risk posed by offenders and effectively mitigate against it.

## **Main findings**

In this section, we set out our main findings that relate to how well the force manages offenders and suspects.

**There is clear policy and process for dealing with outstanding suspects. This is subject to effective governance and is understood by frontline staff and supervisors**

The force has revised its internal processes. As a result, it is now able to effectively prioritise and arrest outstanding suspects. Outstanding suspects are reviewed and highlighted through:

- daily management meetings;
- a fortnightly connectivity meeting, which is a local strategic meeting to determine the police response to incidents and problems, and the resource capability needed to address them; and
- monthly tasking and co-ordination group meetings.

The force uses the On My Patch tool that allows staff to easily access information relating to outstanding suspects who may live in the area.

The force has a system known as WASP (Wanted and Suspected Person). It is for registering wanted offenders who are likely to still be in the local area, before they are placed onto the [Police National Computer](#) (PNC) as a formal wanted person. Their details are available on officers' hand-held devices (PDAs) and via the force control room. Force process requires that a file of evidence, called a WASP file, is created before details of wanted suspects are circulated on the PNC. Staff are aware of the need to do this and there is enough supervisory scrutiny.

### **Pre-charge bail is well managed**

The force trains officers in the use of pre-charge [bail](#) (PCB) and [released under investigation](#) (RUI) legislation. And it is striving to make sure that pre-charge bail is always used when appropriate. The force has created a bail IT dashboard which is monitored by a bail/RUI manager. This is supported by locally allocated detective sergeants who assess the reasons for using RUI rather than PCB.

The use of PCB is always authorised on a case-by-case basis. This is instead of having a dual policy that sets out, by crime type, whether its use is appropriate. PCB is rarely used without conditions or restrictions for the suspect.

Chief inspectors oversee bail extension decisions and monitor the supervision and progression of investigations of RUI suspects. This makes sure that there is as little delay as possible, and that investigative timescales and reviews are set. Sergeants review investigations every 28 days. They assess compliance with the Code of Practice for Victims (VCOP), investigation plans and progress.

The force has produced guidance with specific reference to the use of RUI and bail in investigations involving indecent images of children. It states that bail is only granted when necessary and proportionate to the offence. There are processes to make sure that cases involving the sharing of indecent images of children are risk-assessed quickly, that higher-risk cases are dealt with promptly, and that information is shared appropriately.

The force is developing an app, called Apex, that will link actions recorded under the VCOP to investigations relating to RUI on the force IT system. This will show victim or suspect status, together with any areas of vulnerability. Apex is currently used to track the management of organised crime groups.

We found little evidence of the use of suspect management plans, particularly for the safeguarding of vulnerable suspects.

### **The force has an integrated offender management (IOM) programme based on offenders who pose the greatest risk**

The force has an [IOM](#) programme for offenders who pose the greatest threat, risk and harm. The scoring and identification of offenders shows how effective this programme is.

Before an offender qualifies for IOM, they are graded through a scoring matrix. Threat, risk and harm are considered, as well as the recency, frequency and gravity of the offending.

IOM processes are well understood and have been in place for several years. The IOM team has five police constables and one manager. The team works with a variety of organisations, including the National Probation Service, Community Rehabilitation Company (before its abolition) and Change Grow Live, which provides drug and alcohol recovery advisory services. Although not based in the same building, these organisations all work closely together and have regular virtual meetings.

It is recognised that those on IOM, by their nature, are repeat offenders. Most sex offenders are managed for life. Repeat offenders can be identified through internal dashboard data. IOM officers attend fortnightly neighbourhood police meetings for all six local policing areas. They provide updates on prolific offenders and intelligence is routinely shared among staff throughout the policing areas.

IT updates mean that IOM data can now be incorporated into the force tasking process that helps to monitor and allocate resources. This has raised awareness of IOM, highlighting the current and future threat and assessment of offenders. The force has created a common operating picture (COP) document. Updated fortnightly, it focuses on the high-risk priority offenders with which the force needs extra support from the force intelligence bureau. The COP document, together with the force tasking process, makes sure that IOM has the resources to effectively manage offenders.

Overall, [multi-agency public protection arrangements](#) (MAPPA) appear to be well managed. However, not all breaches of notifications are recorded.

### **The force understands the benefits of managing offenders effectively as well as the impact and costs associated with offenders, not just to policing but to other organisations**

The force has several processes in place aimed at diverting individuals away from criminal behaviour. This is focused on children and young people. For example, it works with the Children First Custody Diversion Programme. The aim is to educate rather than criminalise young people who have admitted to being involved in offending. As part of the programme, the force works with minority ethnic communities because it was recognised that there was a disproportionately high number of 'no comment' interviews involving young people from these communities, which can make diversion more challenging.

The force is also involved in the Aston Project. It aims to identify young people aged between nine and 17 who were involved in anti-social behaviour to divert them away from this type of behaviour by encouraging them to take part in community activities such as gardening, sports and volunteering.

# Disrupting serious organised crime

Good

Gloucestershire Constabulary is good at managing serious and organised crime.

## Innovative practice

The force has designed and made available to the workforce an app (called Apex) to record organised crime group (OCG) activity. It is easy to use and encourages staff to record OCG disruption activity. This has improved performance reporting in the region.

## Main findings

In this section, we set out our main findings that relate to how well the force manages serious organised crime.

### **The force uses all available intelligence well to identify, understand and prioritise serious and organised crime (SOC), and inform effective decision making**

As part of its restructure, the force has moved to a local policing area structure that consists of three local policing units. It has changed its operating model and now follows a threat-based structure. This aligns with the pillars set out in the [national strategic assessment](#): commodities, prosperity and vulnerabilities.

The force has also restructured its intelligence directorate to align with the new structure and operating model. It now operates a hybrid geographical and thematic threat-based model.

The force's strategic assessment uses information, including information from other organisations, to assess the threat posed by organised crime. It follows the threat pillars to mirror the new structure. The force uses [MoRiLE 2020](#) to assess the threat posed by SOC, and to prioritise its responses. It has improved its strategic assessment of the most significant risks. This assessment underpins the force control strategy, which details and prioritises the crime types that present the most threat. Developed by the National Police Chiefs' Council, MoRiLE is a tool that assesses the types of crimes that create the greatest community threats. It also highlights where forces lack the capacity or capability to tackle them effectively.

The force has its own sensitive intelligence unit (SIU) that supports the SIU in the [regional organised crime unit](#) (ROCU). The force has also retained its own surveillance and [covert human intelligence source](#) (CHIS) capability.

As part of the new structure, the force has introduced a process to monitor threats and dynamic (real time or live) intelligence. The process means dynamic threats:

- are first passed to the daily management meeting;
- then to a threat desk for development; and
- ultimately to the force tasking process.

The process is not provided on a 24-hour basis which means that not all SOC threats can be effectively managed outside main business hours. The force is aware of this and is already developing a business case to make improvements.

We found strong processes related to the governance and use of force intelligence to deploy staff and officers. There was good evidence that intelligence needs are promptly allocated to the neighbourhood teams. This process is helped by features such as the OCG on a Page bulletin on the force intranet and On My Patch briefings which include specific intelligence requirements. Every fortnight, the force highlights the OCG most likely to be causing the greatest harm. The extra focus makes sure that activity is prioritised. It helps neighbourhood officers to gather and report OCG intelligence and to identify prolific offenders who may need to be diverted into Prevent programmes.

The force now has [SOC local profiles](#), each of which contains information from organisations the force is working with. They highlight people who may be vulnerable to being drawn into crime and who could potentially become victims. These profiles have been developed recently and will need to be incorporated into the local strategic partnership (LSP), for them to take into consideration regarding any support from other organisations and in the development of a multi-agency action plan, for the force and the organisations it works with to take forward.

However, the force does not map all SOC threats as soon as they are identified. Some threats were identified and/or disrupted before being assessed under national SOC processes. The force should review its processes to make sure that all threats are mapped in line with national policy.

### **The force has the right systems, processes, people and skills to tackle SOC and keep the public safe**

The force has two assistant chief constables, each with responsibility for defined areas of the SOC strategic role. One deals with the operational side (investigations and OCG management) and the other with working with other organisations. SOC is now both a force priority and a priority for the LSP. The force works with other local organisations when analysing threats.

During our inspection, the force managed three [county lines](#), and 21 OCGs.

The force has a command structure that oversees SOC and holds staff to account. SOC tasking meetings are central to the oversight, co-ordination and allocation of SOC-related activities. The force is also represented at the regional tasking meeting.

The force has an effective meeting and governance structure to oversee SOC. And it has effective processes to help it understand the demands caused by SOC. To deal with SOC, there is:

- a dedicated regional strategic governance group;
- resources allocated to the force, including sensitive (covert) measures;
- a designated OCG monthly management meeting;
- county lines monthly meeting;
- a weekly SOC insight meeting; and
- the force daily management meeting.

OCG oversight in the force makes sure that threat assessments are up to date, to help inform its tactical response. The force uses detailed 4P plans, which are regularly refreshed. But the quality and consistency of these need to be improved. The force often considers the 3Ps (prevent, protect and prepare) before pursuit, to make sure that it uses all opportunities to disrupt potential criminal activity.

The force uses data analysis well to support investigations and it has good SOC investigative capability. This is supported by an appropriate level of technical and specialist equipment. It has retained a level of covert and specialist capabilities, and supports specialists' development by providing appropriate training.

When allocating resources for SOC, there is a clear process to appoint [lead responsible officers](#) (LROs). Since our last inspection, the force has increased the number of LROs to make sure it can meet demand. We observed 20 new LROs taking part in a two-day training exercise. The structure and the OCG management process allows LROs to be more involved in assessing OCGs. LROs are at the forefront of developing their 4P plans; they see this as important to their neighbourhood roles. The central SOC intelligence team provides LROs with support when needed.

The force learns from its SOC and OCG activity and has a best practice page on its intranet.

It does have processes to secure support from other organisations when appropriate. The force responded well to an emerging threat presented by courier fraud when it used prevent, protect and prepare methods before pursue tactics.

**The force tackles serious and organised crime by using a range of overt and covert tactics. This includes using the powers accessible to other organisations**

There are established processes at force and regional level for using [covert policing](#) activity. The force has its own dedicated surveillance unit and uses intelligence well to assess threats and SOC priorities. It has enough resource to meet demand. The dedicated surveillance unit tasking process identifies those who may be at risk of becoming victims or of being drawn into SOC, and who may benefit from diversion activities to prevent them getting involved in crime.

LROs have good relationships with other organisations and through the LSP, using the powers of those it works with to disrupt SOC. A good example of this was an operation involving different agencies, including Trading Standards, which visited

grocery stores where a family was employing and recruiting 89 illegal workers for their grocery and convenience business.

Every OCG is assigned a dedicated financial investigator. Financial orders are used appropriately and the force proactively investigates criminal finances.

The force works well with other organisations to deal with modern slavery.

The force has designed a bespoke app, called Apex, to help it manage SOC. It is used to manage OCGs and to record those disruptions to OCGs that have been validated by the region as effective tactics. The force is particularly good at recording disruptions, most notably in prevention and protection. As the Apex app is easy to use, this has encouraged staff to engage and record disruptions. This is innovative practice, which other forces in the region are keen to adopt.

**The force has a consistent and structured approach to identifying people at risk of being drawn into SOC, or whose offending is likely to become more serious. It works with public and private sector organisations on effective prevention activities and diversionary schemes**

Identifying people at risk of being drawn into SOC is part of the force's strategy to reduce the risk of SOC in its communities. Local policing teams are used well to identify 'prevent candidates'. There is a range of prevention and diversion activities, some of which the force provides, and some that are run by external organisations. They include:

- the Aston Project;
- the National Vulnerability Action Plan (a national plan devised by the National Police Chiefs' Council and the College of Policing to focus on common themes that span different types of vulnerability);
- Restorative Justice Gloucestershire (Restorative Gloucestershire is a group of statutory, non-statutory and voluntary sector organisations who work together with the aim of offering all people who come into contact with the criminal justice system (CJS), or who come into conflict in the community, an opportunity to participate in a restorative intervention. It gives victims the chance to meet or communicate with their offender to explain the real effect of the crime. It also holds offenders to account for what they have done and helps them to take responsibility and make amends);
- Project Solace (Project Solace is Gloucester's Anti-Social Behaviour Team. Its purpose is to tackle high-level anti-social behaviour and prevent incidents of anti-social behaviour within the private sector of the city);
- Children First (Children First is an initiative that has been effective since 1 January 2018 in the Gloucestershire area. The aim is to divert young people from the criminal justice system); and
- the police cadets (the cadets scheme is not a scheme that provides a route into a police career, but instead is an initiative aimed at diverting young people into community projects).

Recently, the force ran a successful operation to divert younger members of families linked to OCGs, away from their involvement in a high threat OCG. It is a good example of the force's intention to disrupt OCG activity using prevent tactics.

### **SOC offender management prevents people in the criminal justice system from continuing to offend**

The force uses [Serious Crime Prevention Orders](#) (SCPOs) and gang injunctions to prevent people from repeat offending.

The force is developing the multi-agency response to SOC (MARSOC) process. The process was introduced in autumn 2020, but implementation was delayed due to lack of funding.

### **Police and other organisations work together to reduce risk and vulnerability in local communities**

The force is good at recognising and dealing with harm, including hidden harm, and sharing information about vulnerable victims/groups with other forces, organisations and agencies, which prompts appropriate action and support. It has a dedicated strategic threat lead for vulnerability and it is working to protect those potentially vulnerable from SOC. Safeguarding is at the heart of operational decision making. The force is clearly committed to working with local organisations and businesses to tackle SOC and raise awareness.

The force uses neighbourhood officers to help reduce the risk of SOC and identifies vulnerability to SOC using other organisations.

Risk assessments are conducted on all detainees as part of custody booking-in processes and there are dedicated [liaison and diversionary](#) support workers in custody suites. Those support workers assess individuals and where necessary, refer females to keyworkers from The Nelson Trust. This is a charity that brings self-belief, hope and long-term recovery to people whose lives have been torn apart by addiction and the multiple and complex needs that come with it. All female detainees receive a leaflet with information about The Nelson Trust and these are followed up with regular meetings. Young people are supported by youth support workers who are also based in custody suites. These support workers provide an advice line to investigating officers. Children First is a dedicated team that reviews cases involving young people and makes decisions about [out-of-court disposals](#) and diversions to stop young people being criminalised when this can be avoided.

# Meeting the strategic policing requirement

We don't grade forces on this part of our assessment. In this section, we set out our main findings for how well Gloucestershire Constabulary meets the strategic policing requirement (SPR).

## Main findings

Gloucestershire Constabulary has an established exercise programme that tests its capability to respond to civil emergencies.

It works constructively with other forces to counter terrorism.

Gloucestershire Constabulary plays an important role in the multi-agency [local resilience forum](#) and has effective working groups to develop capabilities for specific threats, such as flooding.

### **The force understands the Strategic Policing Requirement (SPR) threats, and these are prioritised alongside local policing objectives**

In Gloucestershire, we found the six SPR threats to be an integral part of the force's business planning procedures. All of them are referenced in its strategic assessment and [force management statement](#) (FMS), and some are included in its police and crime plan. In the FMS and the strategic assessment, the threats are scored according to the MoRiLE risk matrix. But only SOC and child criminal exploitation are prioritised in Gloucestershire's control strategy.

### **The force's response to SPR threats is central to its business planning procedures and is kept under constant scrutiny**

SPR is set out consistently in both the strategic assessment and FMS (high priority concerns, priority concerns and other threat gradings). Senior leaders are responsible for:

- plans that identify poor performance;
- building the force's capabilities; and
- keeping developments under close review.

The force identifies areas where improvements can be made. For example, it considers that it has a good understanding of the current number of child sexual abuse exploitation (CSAE) offences. But it states that the changes to society from lockdown make it more difficult to predict the effect in relation to contact abuse (particularly in the home) and online sexual abuse. More work is being done to understand this.

CSAE was a force control strategy priority for the last 12 months. Child abuse will be a force control strategy priority in the next 12 months, alongside child criminal exploitation. This will ensure enough focus and resource in this area. The force works well with neighbouring forces and other organisations to address SPR threats.

The force plays a prominent role in the Gloucestershire Local Resilience Forum, which is chaired by the chief constable. He is supported by an effective executive board with representation from local authorities, the NHS, and the emergency and armed services. We note that the forum has a strong brand identity, Gloucestershire Prepared. This supports a joint understanding of common goals among members.

Working groups support the forum by examining the main threats in the county. Senior staff from other organisations lead sub-groups that provide resource and support activity. For example, the chief executive of Stroud District Council is responsible for community resilience if evacuation were necessary. And the force's communications directorate is responsible for Warning and Informing if mass public messaging is needed following an emergency.

The force brings momentum and purpose to the forum. A good example of this is the integrated emergency management (IEM) doctrine. The IEM doctrine provides the local protocols that bring members together, with a particular focus on the role of operational commanders.

### **The force is committed to assessing and improving its capabilities to manage SPR threats**

The force has developed a programme to effectively assess its capabilities. The programme includes exercises that are linked to 16 main threats, as identified by the local resilience forum. The programme identifies very high, high, medium and low risk events. These are cross-referenced to the likelihood of them occurring, and their effect if they do occur.

Recent exercises, such as Operation Link, tested the response to a power outage caused by flooding. A particular focus was to examine the role of operational commanders in the first 30 minutes of an event of this nature. Following the exercise, the force held a debrief of the exercise using the nationally recognised [joint organisational learning](#) protocols. When de-briefing exercises, we found no evidence to show that the force makes explicit reference to the 5C enablers (capacity, contribution, capability, consistency and connectivity).

### **The force has tried and tested plans with other forces in the region to mobilise resources in times of crisis**

These arrangements are clearly set out in the South West Regional Mobilisation Plan (December 2020). Devon and Cornwall Police manages the plan, and hosts the South West Region Information and Co-ordination Centre (SWRICC).

The plans were last tested in December 2020 as part of a national exercise for a mass mobilisation of officers across the UK. All forces in the region could fulfil the mobilisation requirement. But some operational pressures were identified.

In particular, the availability of supervisory officers and access to specialist driving capabilities needs to be addressed in the region.

### **The force is building resilience and improving its capabilities for the future**

Gloucestershire Constabulary's FMS, in conjunction with the Police Uplift Programme (PUP), shows a commitment to assess future pressures and build resilience. For example, recognising that major incidents lead to demands on forces to provide staff skilled in accurately recording decision making, the force has trained staff to accurately record decisions during ongoing major incidents. This has been done through the training function of the local resilience forum.

### **The force works constructively with other forces to counter the most significant threats**

Alongside Wiltshire Police and Avon and Somerset Police, Gloucestershire Constabulary regularly tests the South West region's Operation Plato plan. This involves testing the Military Aid to Civil Authority (MACA) principles and the role of the MOD's Joint Regional Liaison Officer (JRLO).

# Protecting the public against armed threats

We don't grade forces on this part of our assessment. In this section, we set out our main findings for how well Gloucestershire Constabulary protects communities from armed threats.

## Main findings

### **Gloucestershire Constabulary works effectively with other forces in the region to provide armed policing**

During our last inspection, the force was ending its collaborative working arrangements with Wiltshire Police and Avon and Somerset Police. We are reassured that joint working arrangements between the three forces remain productive. Notably, training facilities and specialist capabilities are shared and strong governance arrangements mean that the three forces continue to work constructively together.

### **The force's understanding of threats is generally good but some improvements are needed**

The threats are set out in its [armed policing strategic threat and risk assessment](#) (APSTRA), which is published annually. It is overseen by an assistant chief constable at the operational policing board.

While we are assured that the force has a good grasp of armed threats, there is still work to do to make sure the APSTRA fully complies with the national guidance issued in 2019. This includes a four-year projection of demand, the amount of time it typically takes armed officers to resolve incidents and how often different tactics are used.

### **The force is well prepared to respond to incidents requiring armed officers**

Gloucestershire Constabulary's capacity to respond to armed incidents can be depended on, despite a shortage of [armed response vehicle](#) (ARV) officers. The force is addressing this through an internal recruitment drive and by encouraging ARV officers from other forces to transfer to Gloucestershire.

The force draws on support from Wiltshire Police and Avon and Somerset Police when needed. Although the formal collaboration between the forces ended, they all still follow the same standards and operational protocols. This means that each force continues to provide effective mutual support when needed.

## **Gloucestershire Constabulary has access to specialist capabilities should they be needed**

Should specialist capabilities be needed to resolve incidents, the force has a service agreement with the local counter terrorist hub. This arrangement is tried and tested. Local ARV officers and firearms commanders work well with counter terrorist specialist firearms officers if incidents escalate.

Gloucestershire Constabulary has enough well-trained senior officers to command armed operations in the county.

Because of the failings identified by the [Anthony Grainger Inquiry](#), we checked that officers in strategic and tactical command of armed operations were occupationally and operationally competent. We examined governance procedures and interviewed firearms commanders and found that officers are properly trained, their performance is monitored, and they are fit to carry out their responsibilities effectively.

The force's strategic and tactical firearms commanders are trained alongside commanders from Wiltshire Police and Avon and Somerset Police. This ensures a consistent standard in the region.

Gloucestershire Constabulary uses tactical information packs (TIPs) well to protect venues that are susceptible to terrorist attacks. The TIPs provide a site-specific quick reference guide for armed officers responding to incidents or involved in deterrent patrols.

## **The force supports national approval procedures for acquiring weapons and specialist munitions**

The force has effective procedures in place should it need new weapons or specialist munitions, overseen by the assistant chief constable.

The decision to acquire new weapons would be taken in conjunction with Wiltshire Police and Avon and Somerset Police, because of the close working relationship between the forces.

## **Effective procedures make sure that firearms commanders are familiar with armed policing tactics**

As part of firearms operations, firearms commanders are responsible for authorising the tactical deployment of specialist munitions. It is important that they are familiar with the benefits, risks and physical effects that these have on individuals. The authorisation and use of specialist munitions forms part of strategic and tactical firearms commanders' training and development. Firearms commanders are confident that they can successfully end armed operations by using specialist munitions appropriately.

### **Gloucestershire Constabulary has plans to address foreseeable threats**

The force has detailed operational plans to protect vulnerable sites and high-profile individuals in the county. It tests security plans in a rolling programme of exercises. These involve other emergency services, unarmed officers and the army. One recent exercise, Operation Plato, assessed how ARV officers work alongside an army regiment in response to a terrorist attack.

The National Counter Terrorism Police Headquarters guidance on the role of unarmed officers has been disseminated widely in the force. The guidance provides instruction on their main responsibilities, recognising they are likely to be the first to respond to incidents of this kind.

### **The force routinely debriefs armed operations to identify areas for improvement**

Gloucestershire Constabulary reviews the result of all firearms incidents that officers attend. This helps to make sure it identifies best practice and areas for improvement. We also found that this knowledge is used to improve training and operational procedures. Organisational learning is communicated effectively with Wiltshire Police and Avon and Somerset Police.

# Building, supporting and protecting the workforce

Good

Gloucestershire Constabulary is good at building and developing its workforce.

## Innovative practice

### **The force uses a reverse mentoring scheme**

New and existing members of staff are encouraged to work with senior managers on the reverse mentoring scheme. The aim is to give managers an insight into individuals' experiences both within and outside the force. Currently, this focuses primarily on those who may have joined the organisation from a black or ethnic minority group. This is an effective way to educate and inform leaders, who can then pass the learning on to all staff.

## Areas for improvement

### **The force should improve how it uses data to better understand how and why corruption is a threat to both the force and community**

The force would benefit from an automated electronic solution to connect HR and vetting systems. When testing the vetting unit's work against approved professional practice (APP), we found areas that need more work before we can say the force complies fully with APP. The force needs to improve annual checks so it is aware of any changes that might affect the vetting status of staff. Awareness of these checks needs to be raised among the workforce.

**The force is not effectively monitoring the potential disproportionality in vetting decisions across different groups and does not carry out any such analysis**

Force monitoring of disproportionality in vetting decisions means that the force understands which people with protected characteristics have been subject of vetting and the results of the vetting decisions made about them. Without this information, the force cannot assure itself that everyone who is subject to vetting is being treated fairly.

## **Main findings**

In this section, we set out our main findings that relate to how well the force builds and develops its workforce.

### **The force promotes an ethical and inclusive culture at all levels**

The force has strong governance arrangements and has updated its people strategy. It has an overarching approach, with ‘standards matter’ as a priority. And it follows a ‘better together’ approach to its people management and recruitment processes. This covers a range of workforce-related topics aimed at achieving the force’s aims of becoming an employer of choice and encouraging people from diverse backgrounds to join the organisation. It has supportive leadership and wellbeing programmes, and has adopted the NPCC equality, diversity and inclusion strategy. Its citizens in policing board oversees its approach to the use of volunteers.

There is a recognition of the need to have unconscious bias training at all levels of the organisation. The force is currently reviewing where this training is already being carried out. And it is looking at ways to extend this so all staff can recognise their own bias and be given tools to overcome it. There is an embedded and well used [ethics committee](#), which is chaired by an independent member of the community. Its aim is to promote good ethical practice in the organisation, and enhance trust and confidence in the force’s ethics and actions.

The force has invested in a new performance appraisal system called the individual performance review (IPR). IPR includes a framework for individual performance review. It is currently being developed to include extra features, such as measures to show how effective the force is at collecting evidence and completing continuous professional development logs.

### **The force works hard to give its workforce a sense of belonging and inclusion. The aim is to create a fair, positive and ethical working environment for everyone**

The force recognises that police staff can lack clear career progression options. It is looking to develop more career pathways so that all roles and grades are fully understood. The HR department, for example, arranges secondments for many staff to other roles in the organisation, such as project management and analysis. HR managers are also looking at other career pathways for staff, such as into investigations.

The chief constable makes good use of a variety of channels to meet and communicate with staff. He holds monthly meetings with staff associations to provide them with the opportunity to raise and discuss any problems or concerns from the groups they represent. Staff associations told us that these meetings are joint association meetings rather than independent meetings with the Police Federation, Superintendents' Association, or Unison. They felt that on occasions this was a barrier to open discussion with the chief constable.

### **The force improves the wellbeing of the workforce by offering good support, with a strong focus on prevention and early intervention**

The supportive leadership programme helps to identify, develop and support leaders as part of the force's 'people approach'. It is led by the head of learning and development on behalf of the deputy chief constable and the executive board. Supportive leadership and wellbeing courses have been central to the leadership programme. All sergeants, inspectors, chief inspectors and staff equivalents have attended these courses.

The force understands the value of staff welfare surveys, and they are used well. It works with Durham University to assess the data and make changes that benefit the workforce and the force has received praise from the University for the work done in this area. This is reinforcing a culture of supportive leadership.

Recent investment in more occupational health resources is improving resilience and the ability of the force to respond to staff needs. Funding has been approved for a wellbeing manager to continue to support development in this important area. A welfare officer has also been employed. They work independently from, but in conjunction with, occupational health to offer a confidential welfare support service. Everyone who had used it praised the service.

### **The force is building its workforce for the future**

A newly created independent community legitimacy panel is helping to address racial inequality issues. Including members of black, Asian and minority ethnic communities, the panel focuses on areas such as recruitment and promotion. It also helps the force develop policies on stop and search and the use of force. The 'Better Together' manager, who oversees the force's diversity, equality and inclusion programme, set up the panel.

The workforce's quality of work, progression and those leaving the force are all monitored through the people development board. The force is making good progress in its plan to achieve the requirements of the policing education qualifications framework (PEQF). Student officers who encounter problems with aspects of their role are given support. This means that no-one is at a disadvantage during training. There is now a team that encourages applicants from black, Asian and other minority ethnic backgrounds to join the force and there has been some success. In the year ending 31 March 2020, 7.3 percent of those joining the workforce (with known ethnicity) were from black and minority ethnic (BAME) backgrounds. This is higher than the proportion of BAME individuals in the force area population, which is 4.6 percent. The force uses IT systems, such as a people dashboard, to identify trends in recruitment disproportionality.

## **The force vets its workforce effectively**

The force is generally good at managing the vetting of its workforce. The vetting unit has recruited an administrative member of staff and no longer has analyst (vetting officer) vacancies. The unit has enough resource to meet demand.

It uses its Core-Vet system well. The system doesn't link directly into other force systems, such as HR. But all members of the vetting unit have access to the HR workforce system, which is fully searchable. There are processes in place to bridge the gaps that have been identified.

The unit recently developed a bespoke spreadsheet of designated posts, for those who are working in roles that carry a greater level of risk and who need a higher level of vetting on a more frequent basis. This was in response to anomalies identified in the HR workforce system data. This work supports the vetting manager's assertion that the unit is becoming more proactive in developing checks and balances on the data from the HR system. We found evidence on Core-Vet of steps being taken to make sure the required vetting is in place for all designated posts, helping to address the backlog.

The force understands both its vetting data and those staff who have undergone recent vetting. We found very little difference in numbers from the overall headcount compared with current vetting levels. The backlog in designated post vetting is the only area where we still have concerns.

It works well with other forces in the South West region, and has good national links. Other forces in the region are also moving to Core-Vet, and Gloucestershire is the lead force in this. It takes part in the strategic and tactical-level meetings, and staff we spoke to were enthusiastic about the value the force adds.

## **The force's counter corruption unit understands and acts on the threat and risk posed by police corruption**

The force is good at developing and investigating potential corruption intelligence, with systems that are fit for purpose ([iBase](#) and CLUE). This helps the force carry out intelligence management and case management effectively.

A strategic threat assessment has been introduced within the past 12 months. Future assessments could be further strengthened through the inclusion of data, together with information on regional and national perspectives. A bespoke control strategy could also benefit the principle assessment. The associated delivery plan is currently unstructured, and we would encourage the force to revisit this.

The [anti-corruption unit](#) (ACU) delivery plan on the CLUE system, a system to manage end-to-end investigations, is unstructured. However, the corruption intelligence we reviewed was correctly categorised in line with the national standards. This is essential because the data is used to produce the national assessment.

There are sufficient resources to meet the current demand in the ACU, although this may need to be continually reviewed should more effective proactive use of the IT monitoring system lead to increased demand.

The ACU has good and effective working relationships with other organisations that support vulnerable people. Highly motivated ACU staff give presentations on subjects that include raising awareness of [abuse of position for sexual purposes](#), spotting the signs and using the processes for reporting concerns. During COVID lockdown, there were fewer presentations, but contact was maintained through shift briefings and support was given to officers when required.

The force could improve its response to sexual harassment cases. This will make sure that the perpetrators aren't then able to affect vulnerable members of the public. Although reports of sexual harassment are investigated, no further enquires are then routinely made to establish if the behaviour in the workplace is replicated outside the organisation.

# Strategic planning, organisational management and value for money

## Inadequate

Gloucestershire Constabulary is inadequate at operating efficiently.

### Cause of concern

#### **The force does not have adequate financial plans in place and is not managing its resources effectively**

The force's [medium-term financial plan](#) shows an increasing shortfall in its annual budgets every year for the next four years. The plans show its expenditure for this current year (2021/22) to be £1.4m more than its income. But, after setting the budget, the force has now realised this shortfall is actually closer to £2m. This is because items of spending were omitted from the budget. It has since adjusted the way it accounts for certain items and reduced this shortfall. But there are no detailed plans to reduce spending to what is affordable.

Senior leaders within the force need to be fully engaged in financial management. In setting this medium-term financial plan in February 2021, the chief constable committed, by April 2021, to provide a detailed plan for achieving the required savings in 2021/22, along with an efficiency plan to show how the force would reduce its spending over the next four years, to make the finances sustainable. At the time of our inspection (July 2021), the force was still working on these plans. The finance team has been operating with limited resources and senior leaders have not been giving proper oversight and governance.

The cumulative financial gap by March 2025 is showing as more than £10m. And there are no plans in place to make enough savings to balance the budgets over this period. Although the police and crime commissioner (PCC) holds financial [reserves](#) that would be enough to cover the budget gap in the short term, relying on reserves to fund annual spending isn't sustainable. There are already plans in place to spend these reserves on other investments, including much-needed IT system upgrades and improvements to buildings.

It isn't clear how the force can continue to provide the current level of policing within its anticipated budgets. The force doesn't fully understand likely future demand for its services, and can't be sure that its current operating model will enable it to meet future demand. It doesn't have a good understanding of where its current skills and capabilities gaps are in its workforce. Also, financial plans are not aligned with other corporate plans such as workforce, IT and estates strategies.

In addition, the new PCC has committed to increasing the number of police officers and staff working in the force by around 200 more than is already budgeted for. The force has not yet planned how it can afford to pay for these extra posts, or how they will be used.

Gloucestershire Constabulary should:

- make sure it has enough capacity to manage its finances effectively and that its senior leaders exercise proper governance and oversight of financial management;
- develop a sustainable and affordable medium-term financial plan, that will enable it to provide policing services that meet future demand, based on reasonable assumptions about future income and expenditure; and
- make sure that financial plans are aligned with workforce, IT, estates and other corporate plans, and that all are accurately informed by a sound understanding of likely future demands for its services.

## Areas for improvement

**The force needs to make sure that its performance framework is effective and capable of alerting managers and senior leaders to areas of under-performance in good time, so it can address these**

There is a governance structure in place to report on, and monitor, performance. And the force has an operational policing board, which receives reports on areas where performance is below what is required and can escalate these to a performance improvement meeting, designed to make sure improvements are put in place. However, this structure is not supported by good management information and initial performance monitoring isn't comprehensive enough to identify promptly identify, areas where action is needed.

**The force needs to better understand its current demands and thoroughly review the way it allocates resources within its operating model. This will make sure it has enough people in the right place, with the right skills to meet demand**

It has recently changed the way it operates by introducing a new policing structure. But it is not clear that it has allocated the right level of resources to achieve its objectives. Performance in some important areas is falling short of what is required. The force has several challenges that it is now addressing and these are affecting its performance and its ability to provide an effective service to the public. For example, there are significant backlogs in processing domestic abuse reports, neighbourhood police officers are getting overloaded with crime investigations, and emergency and non-emergency calls are taking too long to answer. This means victims of crime, including those who are vulnerable, may not be getting the service they need.

## **Main findings**

In this section we set out our main findings that relate to how well the force operates efficiently.

### **The force has acknowledged that its approach to financial management has been inadequate, and has started to address matters**

The chief finance officer (CFO) position had been vacant for some time. It had also lacked strategic financial management capability within the finance team. In April 2021, the force brought in an interim CFO to cover the vacancy on a temporary basis. It also recruited a new head of finance in November 2020. In their roles, they have reviewed the capacity and capability in the finance team and concluded that although capacity is limited, there are inefficiencies and wasteful practices that can be reduced by smarter working methods. For example, the team is still processing police overtime manually using paper claim forms. They estimate that a digitised solution to processing overtime alone would save around a third of the team's time. The force has recognised the need to improve its strategic finance capability and is seeking to improve its processes by working more closely with professional bodies such as the Chartered Institute of Public Finance and Accountancy (CIPFA). Senior leaders have had limited engagement with financial management; the deputy chief constable told us he was unaware of the £10m shortfall showing in the latest medium-term financial plan. Financial planning and management have traditionally been left mainly to the CFO to manage. The force recognises that it needs to plan its finances better and has taken steps to address this. It has since set up a finance delivery group, chaired by the deputy chief constable. It has also established a 'smarter ways of working' programme and is starting to explore areas where it can improve efficiencies and make savings in order to balance its budget.

## **The force has ambitious plans to improve, and achieve greater efficiency and productivity through investing in IT**

The force has recognised that its IT systems are insufficient for its current and future needs. It has ambitious plans to invest a significant amount of money in new systems. This includes: a new records management system; a new HR and duty management system; a digital evidence management system; and upgraded mobile working systems for frontline staff. In total, this is estimated to cost £11.43m. £5.43m of this will be paid for using reserves, and the remaining £6m is set to come from capital receipts, most of which are already secured. Plus, in common with its other back-office functions, the force informed us that capacity within the IT department has been reduced to cope with financial cuts brought about by austerity since 2010. It is able to maintain existing IT services, but isn't resourced to manage and implement major new projects. This presents a challenge given the significant IT innovations the force needs to put in place.

October 2021 | © HMICFRS 2021

[www.justiceinspectors.gov.uk/hmicfrs](http://www.justiceinspectors.gov.uk/hmicfrs)

## Gloucestershire Police and Crime Panel

<b>Report Title</b>	Complaints Procedure
<b>Item for decision or information?</b>	Decision
<b>Sponsor</b>	N/A
<b>Author</b>	Andrea Clarke, Senior Democratic Services Adviser
<b>Organisation</b>	Gloucestershire County Council
<b>Key Issues:</b>	
The handling of complaints procedure to be amended to reflect the role of the Deputy Police and Crime Commissioner.	
<b>Recommendations to Panel:</b>	
To accept the changes marked in bold in the handling of complaints procedure to reflect the role of the Deputy Police and Crime Commissioner.	
<b>Financial/Resource Implications:</b>	

This page is intentionally left blank

## Gloucestershire Police and Crime Panel

### Handling of Complaints

#### Process

- The Panel's functions do not cover criminal complaints about the Police and Crime Commissioner **and Deputy Police and Crime Commissioner** which are dealt with by the Independent Police Complaints Commission (the IPCC).
- The Panel does not cover complaints about the police force itself as these kinds of issues should be dealt with by the Chief Constable or Police and Crime Commissioner as appropriate.
- The Panel is responsible for overseeing the handling of complaints regarding non-criminal behaviour of the Police and Crime Commissioner **or Deputy Police and Crime Commissioner**, wherever that complaint arises from.
- The Panel have delegated the initial handling of complaints to the Chief Executive of the Commissioner's Office. The Chief Executive would consider all non-criminal complaints regarding both quality of service and conduct, and act to broker local resolutions to resolve the complaints and restore relationships.
- The Panel would then receive a monitoring report regarding complaints against the Police and Crime Commissioner (and Deputy Police and Crime Commissioner if applicable) at each meeting. This would detail the number of quality of service and conduct complaints and state whether local resolutions had been agreed. In addition this report would outline the number of compliments received.
- If local resolutions could not be brokered and the complainant wished to take the matter further this could be then brought to the attention of the Panel.

#### Relevant Regulations – The Elected Local Policing Bodies (complaints and misconduct) Regulations 2011

- The Panel must ensure that it is kept information about complaints and conduct matters and their handling – regulation 6(1)
- Where a PCP determines that it is the relevant PCP, or is notified of a complaint by, it must record the complaint – regulation 9 (5)

- A PCP must refer a complaint to the IPCC if the PCP determines that it is a serious complaint (it is about conduct which constitutes or involves, or appears to constitute or involves, the commission of a criminal offence), or the IPCC requires it to be referred – regulation 13 (1).

Having had a complaint or conduct matters referred to it, the IPCC may refer the complaint or matter back to the PCP. A complaint referred back in this way must be resolved in accordance with Part 4 of the Regulations (unless the regulations are disapplied). A conduct matter must be dealt with in any manner that the PCP determines, which may include taking no action in relation to it. – Regulation 14.