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Rt Hon Priti Patel MP

Home Secretary

2 Marsham Street

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16th August 2022

Dear Home Secretary

Cambridgeshire Constabulary PEEL 2021/22

Under Section 55(5) of the Police Act 1996, as Police and Crime Commissioner I am pleased to provide my formal response to Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) following the publication on 21 June 2022 of PEEL 2021/22 – An inspection of Cambridgeshire Constabulary.

Both the Chief Constable and I welcome the publication of the report into Cambridgeshire Constabulary's efficiency, effectiveness, and legitimacy. HMICFRS reports provide a vital source of information and allows me as the Commissioner to assess the performance of the Constabulary and hold the Chief Constable to account.

Overall HMICFRS were pleased with aspects of the Constabulary's performance, grading the force as 'good' in four key areas including crime recording, protecting vulnerable people, using its resources, and developing its workforce, and adequate

in a further three areas of policing. However, HMICFRS identified two areas which requires improvement. Responding to the public and investigating crime. In total thirteen areas for improvement (AFIs) were identified within the report.

I am pleased to receive a response from the Chief Constable which provides an explanation of what action is being or will be taken. Since the publication of the report, I have introduced additional governance arrangements to monitor progress against the AFIs. I will continue to take further reassurance from the Chief Constable through this and my existing governance arrangements.

A report from the Chief Constable in respect of Cambridgeshire Constabulary's response to the areas for improvement identified by HMICFRS is attached at Appendix 1.

I hope my response, and that of the Chief Constable, provides reassurance regarding the commitment of both myself and Cambridgeshire Constabulary in providing an effective response to PEEL 2021/22 – An inspection of Cambridgeshire Constabulary.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Preston', written in a cursive style.

Darryl Preston

Police and Crime Commissioner for Cambridgeshire and Peterborough

Cambridgeshire Constabulary's response to the 2021/22 HMICFRS PEEL areas for improvement.

HMICFRS have identified 13 areas for improvement (AFIs):

1. AFI: The force needs to improve how it records equality data.

Context: The Constabulary's data for victims of crime shows that age and gender are well recorded, ethnicity is less well recorded, and other protected characteristics are not well recorded. The force should be collecting this information to understand the extent to which each protected group is affected by crime, how this differs from those without the protected characteristics, and whether a different response is needed for these victims.

Force response: The Constabulary recognises the importance of ensuring that information on protected characteristics is accurately and consistently recorded so that we understand the effect of crime on our communities. Improving data quality continues to be a key strategic priority for the force and work is ongoing to improve how equality data is recorded and analysed. Preliminary audits have been carried out on calls for service to understand and identify gaps in the recording of data at the first point of contact. The results have been reviewed and training for staff has been refreshed to improve performance. Guidance will also be extended force-wide to encourage the collection of equality data. The force will enhance its quality assurance and feedback processes to regularly monitor compliance and support organisational learning. It is also acknowledged that adjustments to the Athena crime management system would support the consistent recording of all protected characteristics and the force will continue to engage with the National Police Chiefs' Council (NPCC) and National Athena Investigation User Group to devise a way forward. Robust governance arrangements are in place through the Crime Standards Delivery Group to ensure continued progress in this area and introduce further improvement measures if necessary. A newly formed Victim Delivery Group will also scrutinise equality data and use this information to inform victim focused service delivery.

2. AFI: The force should make sure that reasonable grounds to search are correctly recorded in stop and search encounters.

Context: The force has previously been a high performer in its recording of reasonable grounds to search in stop and search encounters. In 2019 and 2020, an HMICFRS audit found that 94 percent of grounds recorded on stop and search forms were reasonable. The audit only measures the quality of the grounds as they are recorded on the stop and search form, not whether the grounds themselves were reasonable at the time. In 2020 and 2021, this percentage dropped to 80.6 percent. The force must understand what has contributed to this decline and establish whether it represents a reduction in the number of reasonable grounds or a reduction in the effective recording of reasonable grounds. The force has audited its stop and search records, which suggests that there is primarily an issue with how the force records reasonable grounds. The force should make sure that it sustains an improvement over time of the number of reasonable grounds recorded by the force during stop and search encounters.

Force response: The Constabulary is committed to ensuring that stop and search powers are used fairly and respectfully. We acknowledge HMICFRS' findings in this inspection and work is ongoing to improve the accuracy of reasonable grounds recorded in stop and search encounters. A Reasonable Grounds Review Group carries out a monthly audit of stop and search records, which includes reviewing body worn video footage, to identify learning and good practice. The primary aim of this Group is to improve the standard of stop and search records, with a specific focus on grounds given. The process has recently been enhanced by the introduction of additional reviews by a Superintendent. Feedback is provided to individual officers, supervisors, and our Continuous Professional Development Units to put improvements in place. The outcomes from these audits, alongside findings from our well-established external scrutiny arrangements, are examined at the Force Operations Board to identify where further improvements may be required. The findings from these internal monitoring processes indicate that there has been a significant improvement in

the recording of grounds and positive outcomes. This will continue to be closely monitored to ensure sustained progress in this area. The Constabulary is currently recruiting an Ethics and Legitimacy Coordinator to provide quality assurance around ethics and legitimacy with police and public interaction. They will coordinate internal and external scrutiny processes across a number of policing functions, including stop search and use of force.

3. AFI: The force should make sure it takes a consistent approach to the main duties of its neighbourhood policing teams, including building relationships with its communities and problem solving.

Context: Neighbourhood policing teams don't give a consistent service throughout the county. We found that although there were good examples of community interaction and problem solving, these weren't always carried out in the same way by all teams. Some officers we spoke to weren't always routinely engaging their local communities and some had had limited interactions with partner organisations to carry out problem-solving plans together. Officers also didn't always use the ward profiles made available by the force. This inconsistency undermines the force's organisational approach to prevention and deterrence. The force must make sure that neighbourhood teams provide a consistent service throughout the county. It must have clear guidelines for how these important duties should be carried out and effective oversight through the existing governance structure.

Force response: Neighbourhood policing is at the core of our policing model and the Constabulary is committed to providing a high standard of professional service across Cambridgeshire. This continues to be a key strategic priority for the force and work is ongoing to improve our approach. The existing neighbourhood policing strategy, terms of reference and performance framework are currently being reviewed and will be relaunched in the Autumn of 2022 to address the areas for improvement identified by HMICFRS. An engagement plan, underpinned by operational guidance, has been developed to ensure that engagement with the public and partners is delivered in a consistent and effective way. The use of neighbourhood profiles, problem profiles, hotspot maps,

intelligence and Key Individual Network (KINs) data will also be reviewed to support neighbourhood policing officers in understanding their communities, building relationships with their communities, and responding to the issues identified. The overall approach to neighbourhood policing and the professional development of officers is being further enhanced through the development of a structured training programme which will include improving officer's understanding of prevention and problem-solving methodologies. Robust governance arrangements are in place through the Neighbourhood Policing Steering Group to monitor progress and introduce further improvement measures if necessary.

4. AFI: The force should make sure problem-solving plans are routinely assessed and evaluated and that learning is made available to staff.

Context: In our last inspection in 2019, we identified that the force should better evaluate and share problem-solving plans. In this inspection we found that evaluation of problem-solving plans was still limited. While there was some progress in sharing what works, this was still not routine.

Force response: The Constabulary recognises the importance of effectively evaluating problem-solving plans to inform future activity to prevent crime. The force uses the OSARA problem solving methodology to identify and address the causes of crime and anti-social behaviour. A new quality evaluation framework has been piloted to improve the evaluation of those plans and identify what has worked, what hasn't worked, and what can be learned from the practices put in place. The framework will be embedded and a centralised OSARA library has been created to make the learning accessible to all staff. The force's annual awards ceremony that rewards and recognises problem solving and prevention initiatives will also be expanded this year to showcase successful multi-agency work beyond neighbourhood policing in areas such as mental health, protecting vulnerable people, and serious and organised crime. The force will continue to explore ways to expand problem solving advice and support across the organisation and robust governance arrangements are in place through the Partnerships & Prevention Department to ensure continued progress in this area.

5. AFI: The force needs to attend calls for service in line with its published attendance times and make sure that victims are fully updated when delays occur.

Context: The force doesn't always respond to calls within its published time frames. In our previous inspection in 2019, we found this problem was particularly evident in domestic abuse calls that were graded as prompt. A prompt grading means that the call doesn't need an emergency attendance but should be attended within four hours. The force has introduced a new grading of 'priority' for calls that should be attended within an hour. Domestic abuse calls in this grading are escalated for the earliest attendance possible. But while the force has improved their response to prompt graded domestic abuse calls, it still isn't routinely attending calls of all types quickly enough. We found that response and attendance were within the target time in only 41 out of 79 incidents. The delays were mainly in the new 'priority' category. Failure to attend incidents in time can cause victims to lose confidence in the force and disengage from further action. Victims may be put at risk and evidence may be lost.

Force response: The Constabulary is committed to providing a professional and timely response to calls for service, with an appropriate risk-based use of resources to effectively meet demand. We acknowledge the findings in this inspection and the force has been focusing on improving its response to the public as a matter of urgency. A delivery plan is in place to improve call handling, the timeliness of our initial response, and communication with victims. Activities include delivering further training to call handlers on using the THRIVE risk assessment to grade incidents consistently and accurately. Question sets on the command-and-control system are also being reviewed to ensure the gathering of information is as efficient as possible. Policies and procedures relating to the deployment of resources and patrol crewing are being reviewed to ensure best use of resources in line with officer safety. When delays occur, a robust process is being implemented with automatic timers to keep victims informed. The requirement to review THRIVE risk assessments has also been reinforced to ensure that we are constantly reassessing threat and vulnerability in outstanding incidents. An audit schedule is in place to monitor and evaluate progress. Robust

governance arrangements are in place through the Demand Management Strategic Group and Force Performance Board to assess performance, ensure that we are adopting best practice, and identify where further improvements may be required.

6. AFI: The force needs to make sure that call takers give appropriate advice on preserving evidence and crime prevention.

Context: The force doesn't routinely give advice to callers regarding preserving evidence or the prevention of crime. We found that crime prevention advice had been given to callers in only 40 out of the 48 appropriate cases we reviewed. Advice on preserving evidence was given in only 27 out of the 36 appropriate cases we reviewed.

Force response: The Constabulary recognises the importance of providing appropriate crime prevention and evidence preservation advice. The force has carried out an audit of relevant calls for service to understand and identify gaps in the provision of advice. As a result, new guidance has been developed and delivered to all call handlers in the Demand Hub. The force will maintain regular audits to monitor compliance and ensure continued progress in this area. Robust governance arrangements are in place through Demand Hub performance meetings to introduce further improvement measures if necessary.

7. AFI: The force should make sure that repeat victims are routinely identified.

Context: The force isn't routinely identifying repeat victims. We found that checks were made to see if a caller was a repeat victim in only 57 out of 81 cases. Where callers were identified as a repeat victim, this was recorded by a call handler in 30 out of 33 cases. But by not identifying repeat victims consistently, the force can't make sure the victim receives the most appropriate response. It is missing out on opportunities to understand and reduce repeat victimisation.

Force response: The Constabulary recognises the importance of providing an appropriate response to calls for service, taking into consideration risk and victim

vulnerability. The force has carried out an audit of calls for service to understand and identify gaps in completing the THRIVE risk assessment and identifying repeat victims as early as possible. The results have been reviewed and a revised training package, incorporating best practice from other forces, has been developed and delivered to all call handlers in the Demand Hub. New reference guides covering the THRIVE assessment, vulnerability, repeat victimisation, and College of Policing Authorised Professional Practice (APP) have also been created and made available on every desk within contact management. The force will maintain regular audits to assess performance and ensure continued progress in this area. Robust governance arrangements are in place through Demand Hub performance meetings to introduce further improvement measures if necessary.

8. AFI: The force should make sure that investigation plans are created when needed, with supervisory oversight ensuring all investigative opportunities are taken.

Context: The force doesn't supervise investigations effectively and doesn't consistently set initial investigation plans. We found that where it was appropriate for investigation plans to be created, this was done in only 47 out of 60 cases. We found that where it was appropriate for supervisors to give advice and direction to the investigation, this occurred in only 43 out of 68 cases. The force should make sure that every appropriate investigation has a plan. Supervising officers should be involved in developing these plans and in outlining the objective for each investigation. The force should then make sure that supervisory involvement in investigations is consistently applied and carried out to recognised standards.

Force response: The Constabulary is committed to improving investigation standards and this continues to be a key strategic priority for the force. We acknowledge the findings in this inspection and work is ongoing to improve crime standards and supervisory oversight as a matter of urgency. An intervention plan is in place to address the issues identified by HMICFRS and improve the standard of crime investigations across the force through equipping officers with

the tools, skills, and knowledge they need to deliver effective, proportionate, and quality investigations for the victims of crime. As part of this, supervisory capacity in the Volume Crime Teams is being significantly increased to ensure that investigations are supervised and reviewed in a consistent and effective way. Supervisory staff will be provided with appropriate training and resources to improve the quality of investigations and ensure the best possible outcomes are achieved. Dedicated Standards & Assurance Officers (at Detective Inspector and Detective Chief Inspector rank) have also been introduced to focus on reinforcing overall investigation standards, policy, guidance, and training. An audit regime is in place to understand and identify gaps in the presence of investigation action plans, the timeliness of supervisory reviews and the quality of those reviews. Robust governance arrangements are in place through the Crime Standards Delivery Group to scrutinise performance and introduce further improvement measures if necessary.

9. AFI: The force needs to make sure that the requirements of the Code of Practice for Victims of Crime are complied with.

Context: The force isn't effectively adhering to the requirements of the Code of Practice for the Victims of Crime. While we did find evidence of investigators updating victims on the progress of investigations, as agreed with them, we also found that victim needs assessments weren't always being completed. In 15 out of 59 cases, we found no evidence of victim needs assessments being completed, or enhanced services being considered. Victim needs assessments make sure that any special measures needed by the victim are identified at an early stage of the investigation, so that the victim receives the appropriate support.

Force response: The Constabulary is committed to improving investigation standards, this includes adhering to the Code of Practice for Victims of Crime. An Initial Victim Needs Assessment (IVNA) should be completed when raising a crime to support officers' professional judgement as to what immediate help or support the victim may need, whether they would benefit from emotional and practical support by the Victim & Witness Hub, or whether they are entitled to an

enhanced service. The force has reviewed and streamlined the IVNA question set to improve compliance and additional training will be delivered to support these changes. An audit regime is also in place to monitor progress and identify gaps in the completion of assessments. The requirement to complete and record an IVNA will continue to be reinforced to ensure victims are receiving the appropriate support. A Detective Inspector has been allocated as the tactical lead for this area and robust governance arrangements are in place through the Crime Standards Delivery Group to evaluate performance and introduce further improvement measures if necessary. Further detail is also discussed at the newly formed Victim Delivery Group.

10. AFI: The force should make sure that an auditable record of the decision of the victim and their reasons for withdrawal of support or wishes for an out of court disposal or caution are fully documented. It should make sure it documents whether evidence-led prosecutions have been considered in all cases.

Context: The force isn't appropriately documenting the wishes of victims to withdraw from an investigation or to accept an out-of-court disposal, such as a community resolution or caution. Investigators do record victims' decisions, but it is important to obtain an auditable record to have evidence of victims' wishes and to understand why they don't wish to support a prosecution or accept an out-of-court disposal.

Force response: The Constabulary is committed to improving investigation standards, this includes ensuring that the use of outcomes is appropriate. There is a regular outcome audit in place which includes Outcome 16. Part of this audit checks around evidence led prosecutions being considered for DA and checks that an auditable record has been considered and obtained. This will be supported through the delivery of further training from the Out of Court Divisions Suite. The force has also undertaken specific work to review the use of outcome 15 (where the suspect was identified, but evidential difficulties prevented further action) and outcome 16 (where the suspect was identified, but the victim did not support police action).

In response to the learning identified, the force has introduced a No Further Action (NFA) rationale to improve gatekeeping decisions and ensure consideration is given to evidence-led prosecutions where possible. Regular audits are carried out to identify areas for improvement and provide feedback to individual officers and supervisors where necessary. Robust governance arrangements are in place through the Crime Standards Delivery Group to monitor progress in this area.

11. AFI: The force should make sure the quality of supervisory reviews of the management of registered sex offenders are robust and that actions are raised and completed, including comprehensive intelligence checks.

Context: We found that risk assessments of registered sex offenders were generally of an acceptable quality, but supervision of these assessments could sometimes be superficial. Some supervisory reviews merely approved the content of the assessment. In some cases, this approval was warranted, but in others the review clearly missed opportunities to improve the assessment. For example, one assessment didn't contain all the information it should, but the assessment was still approved. In another case, the supervisory review failed to note that the assessment didn't specify what visit frequency was recommended or whether intelligence checks had been conducted. When intelligence checks were recorded, they were carried out only on force systems and didn't include the wider range of intelligence sources available, such as social media. The force has since changed its policies to include a wider range of checks, which we did see in some cases, but it should make sure this practice continues.

Force response: The Constabulary is committed to effectively managing the risk posed by registered sex offenders (RSOs). The force has a bespoke improvement plan in place to enhance the Public Protection Unit and the management of high-harm offenders. A full review of RSO risk assessments, reactive management protocols, and cases has been carried out to identify areas for improvement. Specific requirements have been set to monitor more closely the completion and management of risk assessments, and additional training has been delivered to offender managers to support this. The capability of the Unit is

also being expanded by upskilling staff to conduct all necessary intelligence checks in a consistent and timely manner to inform the management of risk. Robust governance arrangements are in place through Protecting Vulnerable People performance meetings to sustain progress in this area and introduce further improvement measures if necessary.

12. AFI: The force should consider using up to date and accurate information about workforce skills to effectively enhance deployment throughout the workforce and meet any future skills gap.

Context: In our last inspection in 2019 we identified an area for improvement and said that the force should develop a comprehensive skills strategy to determine what future capabilities its workforce will need. In this inspection, we found that the collaborated human resources team now has a better understanding of the skills gaps and has a plan to address them. But it still doesn't have a good understanding of the skills the current workforce has, which means it may not be effectively matching staff to roles. The human resources team has tried to improve this understanding, but progress has been slow due to ineffective IT systems, which don't include the full range of skills the workforce has and those that are limited in scope. The force has introduced a locally based unit to make sure its workforce needs are met. This unit works alongside and with the collaborated human resources team. But until the force has an up-to-date and accurate assessment of the skills of its workforce, decisions may not be being made with the best information available. This means the force is unlikely to effectively use its workforce's full range of skills.

Force response: The Constabulary is part of a well-established tri-force collaboration with Bedfordshire Police and Hertfordshire Constabulary (BCH). There are a number of collaborated services, including a shared Human Resources (HR) department that supports officers and staff across the three forces. The BCH People Board has approved a series of recommendations to progress the BCH skills strategy and improve the understanding of skills and capabilities required to meet current and future demand. At a local level, the

People & Professionalism Department will continue to support HR with this work and ensure that the force is making best use of resources.

13. AFI: The constabulary should review its S23 agreement on the provision of collaborated occupational health to make sure it is delivering what is agreed and that staff throughout the three forces are supported by an effective occupational health unit.

Context: The constabulary has a proven track record of seeking collaboration, which has led to its tri-force collaboration with Bedfordshire Police and Hertfordshire Constabulary (BCH) and a seven-force strategic alliance. And we found that its work to promote and secure staff wellbeing is often highly effective and well regarded by staff. But the force still isn't consistently well served by the tri-force collaborated occupational health function. The BCH occupational health unit has experienced staff shortages, and this has reduced its service. We found that staff were routinely experiencing delays when they approached the unit for help. This has led to some staff seeking private medical support instead. The delays place more responsibility on busy supervisors to manage the problem. They can lead to staff not being deployed, because supervisors don't receive advice on people's fitness to work before they have to make a decision on this. This may reduce the force's ability to meet its demand.

Force response: The Constabulary is part of a well-established tri-force collaboration with Bedfordshire Police and Hertfordshire Constabulary (BCH). There are a number of collaborated services, including a shared Occupational Health Unit (OHU) that provides specialist support to officers and staff across the three forces. BCH have commissioned an independent review of the current OHU provision against national standards by an external clinical expert. The report will be shared with Chief Officers and inform the development of options for future service provision to ensure the forces are supported by an effective occupational health function. At a local level, the force is committed supporting the health and wellbeing of the workforce and will continue to provide a range of prevention, early intervention, and reactive initiatives to improve welfare provision. This

includes the 'pause point' policy for staff in high-impact roles that has been highlighted as an area of innovative practice by HMICFRS.