

# PEEL 2014 – we asked, you said, we did

A response to the consultation on HMIC's programme for annual force inspections

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## Background

- 1.1. This document responds to points raised about the PEEL (police effectiveness, efficiency and legitimacy) 2014 <sup>1</sup> assessments during the consultation we have conducted since the Home Secretary's commission in November 2013. This includes responses to paragraphs 62-68 of [the formal public consultation we ran over summer 2014](#) (see Annex A) on the proposed approach for the entire PEEL assessments programme.
- 1.2. Our full, formal consultation response on the wider PEEL assessments will be published early in 2015.
- 1.3. In November 2013, the Home Secretary commissioned Her Majesty's Inspectorate of Constabulary (HMIC) to develop a programme of annual inspections of the 43 police forces in England and Wales. As a result of this we began a period of consultation, both formal and informal, to help develop our approach to these inspections.
- 1.4. The new programme examines:
  - **effectiveness:** how well each force carries out its responsibilities, including cutting crime, protecting vulnerable people, tackling anti-social behaviour and dealing with emergencies and other calls for service;
  - **efficiency:** how well police forces provide value for money; and
  - **legitimacy:** how well each force provides a service that is fair and treats people properly and within the law.
- 1.5. The aims of the PEEL assessments are:
  - to improve effective democratic accountability;
  - to inspect in a way that leads to genuine improvement in policing services; and
  - to assist in identifying problems at an early stage and reduce the risk of failure.
- 1.6. We are conscious of our responsibility to balance the inspection demands we place on forces with the benefits they, and the public, receive from our work. To this end, HMIC is consulting the public, police forces, police and crime

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<sup>1</sup> 'PEEL 2014' is used throughout this document to refer to the first assessment that will be published by HMIC on 27 November 2014 as part of the new programme of annual all-force inspections. These are known as the PEEL (police effectiveness, efficiency and legitimacy) assessments.

commissioners (PCCs) and others in developing both the overall programme, and the inspections within it – including the use of graded judgments. This work will be ongoing, and we will undertake formal consultations each year as a regular part of evaluating our approach.

- 1.7. We will publish our first assessment of each police force in November 2014. These will draw together all the information we have gathered and examined through inspections carried out or reported in the 12 months prior to publication.
- 1.8. We will also publish Her Majesty's Chief Inspector of Constabulary's (HMCIC's) national assessment of policing: *State of policing: the annual assessment of policing in England and Wales 2013/14*. This will contain a national overview of the performance of all police forces.
- 1.9. This year has been a transitional period for HMIC as we develop a new way of reporting a police force's performance to the public. Previously, we have monitored police force data to spot problems or issues, and carried out inspections into high risk areas of policing, such as domestic abuse. We will not stop looking at these important subjects, or examining police data, but we will also inspect all forces in England and Wales every year on core policing activity to provide a rounded assessment of their performance.

## What you told us and what we did about it

### Delivering for the public

- 2.1. You were clear that assessments should report the truth, even if this is uncomfortable for forces or other parties. The PEEL 2014 assessments – and those published each year after that – will provide an honest and fair assessment of police forces and their contribution to policing.
- 2.2. We want victims to be at the heart of what we do – you agreed that this was an important part of the assessments. We asked Ipsos MORI to gather the views of victims so that we could incorporate these into the 2014 assessment. We also meet regularly with voluntary sector organisations who work with victims to share our work with them and gather their feedback. The Victims' Commissioner attends the crime inspection advisory group and representatives of the Office of the Victims' Commissioner are part of the HMIC Reference Group (along with representatives from the Association of Chief Officers (ACPO), the Association of Police and Crime Commissioners (APCC), the College of Policing, the Home Office, and a number of other national representative bodies).
- 2.3. The crime inspection, one of the inspections which will make up PEEL 2014, focused on how forces support vulnerable victims and comply with their duties in the [Code of Practice for Victims of Crime](#).
- 2.4. Many of you said we should ask the public about what is important to them. The public survey, run by a market research firm, YouGov, on our behalf, found that more than half of respondents wanted to know how well the police are doing in their area but less than a quarter felt informed about the performance of their local force.
- 2.5. Research by a web design company called BANG Communications which tested user expectations and experience also supported the view that having information about police performance was a priority for the public. We used this information when developing the interactive website for PEEL 2014.
- 2.6. Our consultation with you told us you wanted easy to understand information, which was easily accessible, and designed with the public in mind. You wanted a reliable information source, independent of government, which would enable the public to form their own opinion.
- 2.7. We listened to what you said, and we will publish the PEEL 2014 assessments online, via our website. This will be the first time that we have brought all of the information about each force together in one place. This will allow you to easily access the report on your local force (and all other forces)

by entering a postcode. The format is designed to be user-friendly, with different layers of information. You will be able to choose how much detail you want to view, from key facts right the way down to the individual reports from the past 12 months that contribute to the annual assessment.

- 2.8. You wanted us to widen knowledge about HMIC's work and of PEEL 2014, ensuring that our website is the 'go to' place for information about force inspections. We have done this in a number of ways: throughout the summer we have been involving many people, including police forces, the public and other interested parties, in the design and development of the PEEL 2014 assessments and the accompanying web pages.
- 2.9. We have also increased our use of social media during 2014, successfully increasing our Twitter followers, and therefore the number of people who know about our work as more people see our tweets and updates.
- 2.10. So that people are aware of the PEEL assessments and our inspections we will make sure that links to our website and reports are available via our partners' websites and that readers can readily access information.
- 2.11. YouGov identified that more than half of the people they surveyed used the local media as their main sources of information about the police. So we planned regional road shows for each of Her Majesty's Inspectors of Constabulary (HMIs) to brief the local media on PEEL 2014 and ensure that they understand the assessments and in turn can inform their audiences about them.
- 2.12. You also felt that there was a need to recognise the uniqueness and context of each force, and were interested in local priorities and the key issues faced by them. We wanted to give you as much information as possible about the force and PCC priorities so forces have provided information for us to share alongside our reports so that the local context is clear and people can see the local challenges. We are also including links to PCC's police and crime plans as well as information about the PCC priorities for each force.
- 2.13. Forces and PCCs asked for the opportunity to see the assessment before it is published. We have agreed with forces and PCCs that they will have a period of time to read the assessments before publication, thereby also giving them time to consider their response to it.

## Our PEEL 2014 approach

2.14. You asked us to:

- set out clearly the scope of PEEL 2014;
- be careful about timings, so as not to coincide with elections or affect the fairness of process; and
- to review and refine the methodology regularly.
- We have said that the 2014 assessments will take findings from inspections carried out or reported in the 12 months prior to publication.

2.15. We will provide graded judgments only on questions where the inspections were designed to do so – these are the inspections covering value for money<sup>2</sup> and crime. Other inspections<sup>3</sup> published or carried out in the last 12 months have also informed the 2014 assessment and the findings will be reported in narrative form.

2.16. We have carefully considered the timings of the 2014 assessment. Publication at the end of November in 2014 and 2015 is fair as this informs the public but avoids both the general election in 2015 and PCC elections in 2016. It also allows us to report on all, rather than just some, of the 43 forces in England and Wales before the election periods, ensuring fairness to all forces.

2.17. We recognise that the PEEL assessments will develop over the next few years and want to make sure we continually develop, review and consult on these. We will consult the public and police forces regularly, and our commitment to do so was demonstrated by our extensive consultation on our proposed approach during summer 2014. We will also evaluate our approach to ensure we are continuously improving the work that we do and its relevance to the public.

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<sup>2</sup> [Policing in austerity programme](#)

<sup>3</sup> [Child protection](#); [Domestic Abuse](#); [Police integrity and corruption](#); [Strategic Policing Requirement](#); [joint inspection of police custody](#); and [Crime Data Integrity](#).

## The scope of the assessments

- 2.18. The aim of the PEEL assessments is to provide information directly to you about how well your local police force performs. The reports will provide the type of information that the public want to see, in an easily accessible format.
- 2.19. The 43 force reports will inform the themes in our national overview of policing. This is HMCIC's national assessment of policing - *State of policing: the annual assessment of policing in England and Wales 2013/14*.
- 2.20. Results from the survey that we commissioned YouGov to undertake as part of our initial consultation on PEEL, showed that an overwhelming majority of both the public and local councillors were interested in the effectiveness of policing in their local communities.
- 2.21. We specifically consulted frontline police officers and staff, who also agreed with the public view.
- 2.22. Overall, our consultation revealed that there was wide-ranging support for the areas of effectiveness, efficiency and legitimacy that we intend to cover, which were seen as reasonable and fair areas for inspection.
- 2.23. You highlighted several areas that you wanted the PEEL assessments to cover. You told us that how each force protects the most vulnerable people was important to you. Research conducted on HMIC's behalf by Ipsos MORI and BANG Communications also indicated that the public felt that a force's treatment of vulnerable members of society was important. Our domestic abuse report assessed police performance in this area and will contribute to PEEL 2014 while our crime inspection considered how the police assess and respond to vulnerability.
- 2.24. The other area you felt should be included was police integrity and ethics. PEEL 2014 draws evidence from the police integrity and corruption inspection to answer the questions about the legitimacy of policing.
- 2.25. You also wanted us to look at public perceptions of each force, and so we have incorporated data from the [Crime Survey for England and Wales](#) and the views of victims into PEEL 2014.
- 2.26. You suggested that our approach for PEEL 2014 - of using inspections which were not designed with the PEEL assessments in mind - could be problematic if we tried to extrapolate information to fit the PEEL methodology. While we have drawn evidence widely from all of our inspections, we have been careful not to reinterpret or extrapolate the original findings.

2.27. To mitigate the above issue, we have described how the 2014 assessments have been built to our reference group, police forces, PCCs and other interested parties, giving a high level of transparency about our work.

## **The judgments we make**

2.28. Many of you commented on our graded judgments for PEEL 2014. The grades we are using – outstanding, good, requires improvement and inadequate – were suggested during our consultation with others - for example other inspectorates, the HMIC advisory board (comprised of experts in inspection, assessment and social research) and the HMIC reference group. The majority felt that these were the right ones to use.

2.29. A number of you asked why graded judgments were being used for inspections that were underway during the formal consultation during summer 2014. The timings of PEEL 2014 and our inspection programme meant that we made a decision to use a graded judgment for PEEL 2014. However, we will review and evaluate our proposed methodology after publication of PEEL 2014, making changes where necessary before next year.

2.30. You wanted us to be transparent about how we will make graded judgments so, before it was finalised, we consulted on and circulated all of the judgment criteria and our methodology for the crime and value for money inspections, asking the respective advisory groups, police forces and PCCs for their views.

2.31. You also wanted assurance that we would quality assure our judgments. We have done this. All inspections have been subject to robust moderation to make sure forces are assessed and judged consistently.

## **Our recommendations**

2.32. You asked us how recommendations would be progressed. We will monitor and track all recommendations that we made in inspections that contribute to PEEL 2014.

2.33. We do not have regulatory powers to enforce recommendations to be carried out, but we will review any recommendations we previously made during our annual all-force inspections next year.



## **Our inspectors**

- 2.34. You expressed different views about what kind of people should make up our inspection teams. Some of you felt that teams should not include police officers, to guard against conflicts of interest, but many of you agreed with us that it was vital that we employed a mix of people, including police officers, so that they had knowledge and experience of what they were inspecting.
- 2.35. As they have in the past, our inspection teams for PEEL 2014 and other inspections include a mix of seconded police officers and staff, as well as civil servants. We also use peer inspectors and specialist staff to make up our teams. There are three main groups of peer inspectors:
- police subject matter experts;
  - voluntary sector; and
  - statutory partners, for example, representatives from the Office of Police and Crime Commissioners, Home Office and local authorities/government.
- 2.36. We have a comprehensive training programme in place to equip our inspection staff with the tools and skills they need to conduct inspections and make judgments.

## **Crime inspections**

- 2.37. You provided a good deal of feedback about your views on our crime inspection – which was specifically designed for PEEL 2014. The inspection’s advisory group advised us on what we should inspect, and how we should do this.
- 2.38. The crime inspection advisory group said that we should recognise the merit of forces using evidence-based policing approaches to crime prevention and reduction and offender management. This inspection looked for examples of forces using this kind of approach and evaluating their tactics.
- 2.39. The advisory group also felt that working with partners was important in crime prevention, reduction and tackling anti-social behaviour. As part of the inspection we spoke to forces’ partners and the effectiveness of the police contribution to the working relationships between them was assessed.
- 2.40. Finally, you said that inspections should focus on specific entitlements contained within the Code of Practice for Victims of Crime. As a result, inspections look at how forces support vulnerable victims and comply with their duties contained within the code.

## **Police integrity and corruption inspections**

2.41. The other inspection that contributed to PEEL 2014 was police integrity and corruption and the inspection's reference group said that we should:

- pay particular attention to the offences that have received greater prominence over the last couple of years – for example misuse of drugs and sex-related offences involving the abuse of position for sexual gratification;
- consider racial discrimination in our inspection; and
- pay attention to the ways in which people can report wrongdoing and the support there is for those who do so.

2.42. We agreed with this feedback and all the above suggestions were incorporated in to the inspection methodology.

## **Value for money inspections**

2.43. You wanted us to consult widely on our work. We asked our technical advisory group and financial experts to help develop the methodology for this inspection.

2.44. You wanted forces to be able to understand clearly how our inspections would work. We consulted on, and then published, our judgment criteria so that there was clarity for police forces about what to expect during inspection.

2.45. You wanted us to gather the views of the public. We ran a survey to gather public opinion on how forces are responding to spending challenges.

## **Consultation**

2.46. You wanted us to consult widely on the PEEL programme, including hard- to-reach groups. We consulted on the development of PEEL 2014 assessments in a number of ways:

- surveying [the public](#) and [local councillors](#) in March and April 2014 to find out how they get information on police performance;
- running a public consultation over the summer in 2014;
- interviewing victims of crime to gather their views;
- researching and testing user expectations and experience when developing the interactive website for PEEL 2014;

- running a digital marketing campaign to target hard to reach and non-traditional audiences which reached around five million people through social media channels and internet advertising;
- speaking to other inspectorates such as Ofsted and the Care Quality Commission;
- asking the HMIC reference group to meet more frequently for the period of our change programme;
- meeting with our advisory boards;
- involving HMIC's technical advisory group and other practitioners and experts from the police service in developing our methodology;
- creating a crime advisory group including, amongst others, the Victims' Commissioner, Baroness Newlove and members of the voluntary sector; and
- putting in place plans to give all forces and local policing bodies/police and crime commissioners the opportunity to discuss the new inspection programme, be fully informed about its likely effect, and – most importantly – to work with us to help find an approach in which proportionate demands on forces are balanced with achieving the aim of increasing public understanding of how police forces are performing.

## Conclusion and next steps

- 3.1. We have already taken on board feedback received during our consultation on PEEL 2014. We have also been consulting on PEEL 2015, and will publish our full response to this early in 2015.
- 3.2. Next year we will plan our inspections in a way that allows for an even fuller assessment of force performance. Inspections for next year's assessments covering the areas of effectiveness, efficiency and legitimacy will soon begin.
- 3.3. Our inspection programme up to March 2015 will also include a number of thematic inspections, for example 21st century child sexual exploitation, cyber-crime, missing and absent children, a revisit of the use of stop and search powers and so-called honour-based violence. We will also continue our programme of unannounced inspections of child protection arrangements and police custody provision (in conjunction with HM Inspectorate of Prisons).
- 3.4. We will consult the public and other interested parties each year as part of an ongoing process of evaluating our work and ensuring continuous improvement.
- 3.5. PEEL 2014, our assessment of policing in England and Wales 2013/14, will be published on our website on 27 November 2014. This will be in a user-friendly format so that you can see at a glance how your local force is performing.
- 3.6. You can [find out more information about the PEEL programme](#) on our website.
- 3.7. You can contact us by emailing [haveyoursay@hmic.gsi.gov.uk](mailto:haveyoursay@hmic.gsi.gov.uk)

## Annex A

For ease of reference we have reproduced the original text that relates to PEEL 2014 from our formal [consultation on 'HMIC's programme for regular force inspections'](#).

This consultation ran during summer 2014, and at that time PEEL 2014 was referred to as 'the interim assessment'.

The text below can be found at paragraphs 62-68, pages 27-28 of the consultation document.

### Interim assessment

- Not all the staff we require for the PEEL programme are yet in place, and so we will not have the time or capacity to carry out a full PEEL assessment this year. We will, therefore, be carrying out an interim PEEL assessment, using the three themes of efficiency, effectiveness and legitimacy, and the assessment will be published by the end of November 2014.
- There are a number of ways in which the interim assessment will facilitate the achievement and application of the aims and principles of the PEEL assessment programme. We will present the public with information about the performance of each force, providing a level of assurance about the efficiency and effectiveness of policing in England and Wales to support democratic accountability. We will draw out the main findings and recommendations from force inspections undertaken in the last 12 months, thereby inspecting in a way that leads to worthwhile improvement in policing. We will take individual force findings, overall conclusions for each of the themes and the outcome of thematic reports in the last 12 months to provide a national picture of emerging issues to assist in identifying problems at an early stage and reducing the risk of failure.
- The interim assessment will inform development of the full assessment and provide the opportunity to test new methodologies. We will also learn from the reaction of police forces, the public, the media, politicians and other interested parties so that we can improve future PEEL assessments, in particular the full assessment scheduled for November 2015.
- As our methodology for the PEEL assessments programme is not yet fully developed, interim assessments cannot be as comprehensive about each force as our 2015 assessment will be. The PEEL assessments programme is being developed because there is currently no single comprehensive and rounded picture of individual police forces or national policing. The process of

designing the interim assessment has made us intensify our focus on what more we need to do to ensure we have a sound knowledge of the state of the police.

- We will incorporate into the interim assessment the main findings and recommendations of other inspections we have carried out in the previous 12 months, including those concerning crime data integrity, making best use of police time and domestic abuse. Judgments will be made where force inspections were designed with that intention, specifically the force inspections for valuing the police 4, crime, and police integrity and corruption. We will also include those inspections that have not covered all 43 forces but that are nevertheless material to achieving a more accurate picture for the forces concerned.
- The interim assessment will provide an individual assessment for each of the 43 police forces as well as an overview of policing in England and Wales. The assessment will include the following:
  - (a) Assessments of all 43 forces. These will draw out information from recent and new reports into one report for the force. The principal audience for these reports will be the public and will give information on how well their force is performing in respect of a small number of categories of police activity and assessment. Where appropriate, the reports will link to recent and new force inspections.
  - (b) National theme summaries. There will be three national summary reports on each theme: efficiency, effectiveness and legitimacy. They will provide a summary of how well we judge forces are performing and provide some of the detail underpinning the national overview.
  - (c) A national overview. This will draw information from the national theme summaries and other inspections undertaken in the last year.
- We will reflect the feedback from this consultation in our interim assessment where this is possible in the time available.