

Chief Constable's Report
to
Kent Police and Crime Commissioner's Performance and Delivery Board

INSPECTIONS, AUDITS & REVIEWS

8 June 2022

1. Strategic Overview.

Policing is an increasingly regulated public service and the overarching responsibility for governance is set out in the Police Reform and Social Responsibility Act 2011. The legislative framework is complemented by the Policing Protocol 2011 (which came into force in January 2012) and covers the scope of the Act and the specific responsibilities of the key stakeholders including both the Police and Crime Commissioner (PCC) and the Chief Constable. Amongst those responsibilities the protocol states the PCC should: 'scrutinise, support and challenge the overall performance of the Force' and the utilisation of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS) inspections and other audits, and reviews of the force enables the PCC to monitor specific areas of the force that are third party under scrutiny.

2. Aims of the report.

This report will record the key detail of the latest or ongoing inspections, audits or other reviews that have taken place during the period February 2022 to April 2022.

Further detail on the reports and recommendations referenced in section three of this report can be found on the HMICFRS website. The progress of recommendations is monitored through established governance and scrutiny processes with regular updates provided to the Deputy Chief Constable. Formal sign off of recommendations will be undertaken by the force's HMICFRS Force Liaison Lead.

3. Her Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS).

The role of HMICFRS is to inspect and report on the efficiency and effectiveness of police forces and specified national police agencies. HMICFRS's overall objective is to provide, independent and professional assessments of police efficiency, effectiveness and legitimacy for the public, their elected representatives, and the police.

3.1 HMICFRS Publication – A joint thematic inspection of the police and CPS response to rape (phase 2)

On 25 February 2022 HMICFRS published the joint thematic inspection into the police and CPS response to rape. This was the second and final part of the joint HMICFRS and HM Crown Prosecution Service Inspectorate (HMCPPI) inspection of the investigation and prosecution of rape cases in England and Wales.

The inspection examined cases from the point of charge through to their conclusion and included those which were decided in court. Five forces and six corresponding CPS areas were visited as part of this inspection, Kent was not an involved force.

In summary, HMICFRS and HMCPPI concluded that a lack of collaboration between the police and prosecutors had led to delays and poor communication with victims. The inspection also found evidence of many dedicated and hardworking police officers and prosecutors committed to the investigation and prosecution of rape recognising that workloads were high and

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sometimes overwhelming. The report provides nine recommendations, three of which are for Chief Constables. These have been reviewed to ensure the force is compliant.

3.2 HMICFRS Publication – State of Policing 2021

On 10 March 2022, HMICFRS published the State of Policing 2021. This is the annual assessment of policing in England and Wales.

The report stated that a number of important advances had been made in policing including domestic abuse, child protection, the quality of some investigations, relations with the public and workforce diversity. The report also highlighted areas of improvement that need to be addressed such as the need for advancements in technology to keep up with the complex and sophisticated criminality now faced.

As with all HMICFRS reports, the force reviewed the publication for any learning or considered best practice.

3.3 HMICFRS Publication - PEEL 2021/22

HMICFRS undertake a regular assessment of all police forces in England and Wales known as PEEL (police effectiveness, efficiency and legitimacy). Using inspection findings, analysis and professional judgement they assess how good forces are in core areas of policing. On 28 April 2022, HMICFRS published the Kent PEEL 2021/22 inspection findings. The reported findings cover a period of assessment between March 2021 and October 2021.

As detailed in previous papers to the PCC Performance and Delivery Board, PEEL significantly changed in 2021 moving from an assessment of three pillars of policing to twelve core areas. Another significant revision saw the gradings move from a four-tier to a five-tier approach with the addition of 'adequate' as a graded judgement. During Kent's PEEL inspection, HMICFRS further revised the methodology of PEEL, removing assessments in two core areas of policing, namely serious and organised crime and counter corruption and vetting.

The published report provides an assessment of Kent across ten areas of policing with graded judgements on nine. The full report is available on the HMICFRS website however a summary of the areas and gradings are detailed below.

Victim service assessment (Not Graded)

The victim service assessment reviewed the victim's journey from reporting a crime, through to the outcome stage. A review of crime files was undertaken in June 2021 focusing on six areas: call handling; deployment and response; crime recording; crime screening and allocation; investigations; and outcomes.

The findings from the crime review informed the wider core questions within the PEEL assessment framework. As a result, the narrative provided under this section is duplicated later in the report, therefore further detail will be provided within the relevant sections for the purpose of this summary.

Crime data integrity (Outstanding)

HMICFRS have reported the force is outstanding at recording crime for a second consecutive assessment, with a compliance rate of 96.7%.

The report praises the work undertaken to accurately record domestic abuse and recognises the importance of identifying and safeguarding potentially vulnerable victims from further abuse,

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ensuring they are referred to support services. The recording of crime within 24 hours was also referenced and continues to be effective, ensuring investigations commence promptly.

The force was reported to have strong governance and leadership for crime recording with senior officers reviewing compliance and regularly emphasising to staff the importance of recording crimes correctly, creating a culture that recognises its contribution to supporting victims and providing an effective service.

The report identifies one area for improvement which centres around the collection of victim's protected characteristics. This is a national issue with all forces having a similar recommendation set by HMICFRS as part of thematic reports into both rape and violence against women and girls. As a result, a significant amount of work is being conducted to produce a nationally agreed position on protected characteristics in police systems. The force is reviewing current working practices and will progress this area for improvement in line with the national direction.

Engaging with and treating the public with fairness and respect (Good)

Kent were praised for its work with communities and working proactively with other organisations to identify vulnerable victims, taking action to reduce risk and harm and using a range of prevention and enforcement measures.

The Problem-Solving Taskforce were highlighted as innovative in the report. This team, funded by the Police and Crime Commissioner target areas where crime issues have been identified and work within the community increasing engagement and providing reassurance when required.

Regular ward surgeries were found to take place with dedicated Community Liaison Officers (CLOs) building relationships with people from diverse and vulnerable communities to better support, prevent and detect crime.

In respect of stop and search and use of force, Kent Police were found to treat the public fairly and with respect. The communication programme provided to new recruits was found to be effective, enhancing knowledge, skills and understanding of human interaction including non-verbal communication and how attitude affects behaviour. In addition, the Independent Police Advisory Group (IPAG) were noted as having a diverse membership and providing scrutiny to the stop and search process.

The report identifies one area for improvement in respect of surveying victims of crime and assessing public satisfaction. The force has effective processes in place to obtain feedback from victims of hate crime, domestic abuse and rape and this is positively referenced in the PEEL report. Wider surveys of the public take place more informally such as the force open days in which thousands of members of the public are surveyed. The force is considering the implications of this area for improvement in respect of cost, benefit, and current provision to determine next steps.

Preventing crime and anti-social behaviour (Good)

The force were assessed as good at preventing and deterring crime. The force's proactive work with repeat vulnerable callers, known as Op Engage, was highlighted as innovative. The force ensures through continued oversight by a dedicated PCSO, the appropriate referrals are made to partner agencies to ensure support is provided.

The force prioritisation of prevention, anti-social behaviour and vulnerability was commended. The operating model of the force was recognised for its ability to identify the most vulnerable and reduce risk and harm. The positive work with young people to identify and prevent harm or

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criminality through dedicated schools' officers was cited as a positive addition and the introduction of the three multi-agency taskforces who tackle crime, prevent violence, and safeguard those most vulnerable in the community were recognised for the excellent work undertaken.

The multi-agency approach taken by the force, which includes co-located teams with councils, ensures joint responses to anti-social behaviour and was found to be highly effective. The use of volunteers and the special constabulary was also favourably referenced.

The one area for improvement sets out the need for a structured training programme for neighbourhood policing officers and staff. The force currently provides a three-tier structure of training for neighbourhood officers dependent on their specific role with an ambition to develop this further. The force is currently undertaking a review to ensure it can deliver the strategic aims of the recently published Beating Crime Plan, Serious Violence Duty Statutory Guidance and Tackling Violence Against Women and Girls Strategy. The demand, resources, and training of those involved in neighbourhood policing will be reviewed as part of this.

Responding to the public (Requires Improvement)

The force were assessed as answering calls for service (both emergency and non-emergency calls) promptly and regularly achieving or exceeding the standards set nationally. The specialist support and response to domestic abuse victims through the Vulnerability Hub was also highlighted, enabling the provision of early advice and immediate evidence capture. The working hours of the Vulnerability Hub are being expanded as part of further improvements being made to the investigation of domestic abuse which will provide a greater service to more victims.

Officer awareness of vulnerability and knowledge of safeguarding responsibilities when attending incidents was commented on positively. Once a crime is reported, it was found to be allocated to an appropriate department for investigation and HMICFRS reported officers were conscientious in keeping victims updated.

The wellbeing provided to those involved with or responding to emergency calls was recognised. Trauma management processes, availability of counselling, internal culture boards and the priority afforded to officer safety were a few of the examples detailed in the report.

Four areas for improvement were identified which focused on identification of vulnerable repeat callers, provision of crime prevention and scene preservation advice, response to incidents and capacity and capability of response officers.

Whilst the force acknowledges the findings from the PEEL report, processes, governance, and scrutiny are well established in respect of identifying repeat callers and HMICFRS found positive practice. Further enhancements in respect of quality assurance and professional development have been undertaken since the conclusion of the inspection which has strengthened the position further.

The force complies with the National Contact Management Strategy and National Contact Management Learning Programme. Basic crime prevention and scene preservation advice is provided where appropriate and detailed information is available on the Kent Police website. The recently launched 'My Community Voice' which is a web-based product that people can sign up to at no cost, will also provide crime prevention advice.

Of paramount importance when responding to calls is safety of the victims and witnesses, the wider public on the roads of Kent and the officers being sent. HMICFRS found that in the majority of cases attendance times were acceptable and the prioritisation and response to calls

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for service were appropriate to the circumstances of the caller and incident. The force will continue to monitor this.

The force recognises the need to review the capacity and capability of response teams and work is underway to review current resources against the allocation model in line with demand and performance. Officers within response teams perform an extraordinary job day in and day out, keeping people safe, supporting victims, and bringing offenders to justice.

Investigating crime (Requires Improvement)

HMICFRS report that Kent Police understands how to carry out quality investigations on behalf of victims and their families through effective crime investigation policies and governance, which reviews performance against a clear set of standards.

Six areas of improvement are set out within the report focused on resourcing, allocation, investigation plans, evidence led prosecution, victim needs assessment and auditable records when a victim withdraws support from a prosecution. The force, for some time, have been progressing a variety of initiatives to improve the quality of investigations. A monthly Crime Management and Investigative Quality Board chaired by the Assistant Chief Constable for Crime focuses on raising investigative standards, developing, and supporting the investigative workforce and setting clear standards. The introduction of the quality assurance framework (QAF) whereby an assessment is made on the quality of over 400 investigations a month is now well established. This offers extensive guidance and support to officers and supervisors to ensure they have the knowledge and skills with which to undertake quality investigations. This has resulted in improved performance.

The force responded promptly to concerns raised by HMICFRS at the conclusion of their inspection in respect of the resourcing of the Vulnerability Investigation Teams (VITs) who investigate domestic abuse. A detailed review of high-risk domestic abuse reports was undertaken to ensure the investigations were effective and safeguarding had taken place. This review concluded that the risk to victims were appropriately managed. Similarly, detective capacity was increased within the VITs with further growth generated by those on the detective pathway.

The current allocation time to allocate an investigation is one day. The latest force data (March 2022) states in 457 (93.5%) reviews, the assessors determined the crime was allocated in a timely manner. Likewise, investigation plans were created on 403 (82.4%) of the reviews.

A significant amount of progress has been made in pursuing opportunities to prosecute an offender when the victim disengages, known as evidence led prosecutions (ELP). The use of ELP is increasing and is tracked through the Crime Management and Investigative Quality Board. Current data highlights a significant step change in performance when reviewed against the 1.2% referenced in the PEEL report. The latest data indicates ELP was considered and either pursued or deemed not appropriate in 59.4% domestic abuse investigations, 50.0% for hate crime, 51.0% for stalking and harassment and 73.6% for rape. The force continues to work on improving this further.

Kent Police has undertaken a significant amount of work with regards to enhancing the position in respect of victim needs assessment. A recent review highlighted that whilst officers were conducting victim needs assessments the recording of action taken was not in line with force policy and remedial action is now taking place through senior leaders. Discussion took place with HMICFRS regarding the recording of victim's wishes when they withdraw support from a prosecution to seek clarity on the evidence required. As a result, the force have updated the relevant policy and adjusted training.

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Protecting vulnerable people (Adequate)

The force is recognised for the strong governance in place at both a strategic and local level to ensure vulnerability and risk are at the forefront of service delivery. The force operating model is built with vulnerability at its core with the flex to evolve and continuously improve. As a result, the force is reported to be able to effectively safeguard and support vulnerable victims.

The report highlights many positive areas such as the introduction of a new risk assessment tool for victims of domestic abuse known as DARA (Domestic Abuse Risk Assessment) which provides the opportunity to identify patterns of behaviours and crimes such as stalking and coercive and controlling behaviour. Kent was a pioneer in the introduction of DARA with many other forces now adopting.

Also highlighted are the multi-agency stalking prevention panels (MASIP) in place; the force having the highest use of stalking prevention orders (SPOs); the work of the Missing Child and Exploitation Teams in protecting children and young people; the County Lines and Gangs' Teams; and Op Encompass, the process of notifying schools of domestic abuse incidents affecting a child, which has been nationally recognised.

Two areas for improvement linked to the use of protection orders and wellbeing of staff working with the most vulnerable were highlighted.

During the last six months (November 2021 to April 2022) the force issued 107 domestic violence prevention notices (DVPNs) to offenders across the county with 100 domestic violence protection orders (DVPOs) granted by the court. Work will continue in this area to further increase the number of DVPNs and DVPOs in order that victims continue to be protected.

As detailed in the PEEL report a wide range of support is available to staff working with the most vulnerable victims. The force recognise the role these officers undertake on a daily basis and the impact subject matter can have. Engagement with staff is taking place to understand what more can be done to support them.

Managing offenders and suspects (Requires Improvement)

The Integrated Offender Management (IOM) programme is well established and highlighted in the report as being effective. Concentrating on a cohort of offenders and working with key partners, the programme looks to supervise offenders in the community using rehabilitative interventions and enforcement where necessary.

Reference is also made to the well-established governance in place for managing offenders along with predictive analytical data that allows the force to focus on offenders that cause the most serious harm. The force has developed substantial capability and capacity through the County Lines and Gangs Teams, the Chief Constable's Crime Squad and Criminal Investigation Departments. The Chief Constable's Crime Squad take on and remove from circulation those hardened criminals who inflict significant harm on local communities by committing serious acquisitive crime offences, most notably residential burglaries, and robberies. Similarly, the County Lines and Gangs Team target those individuals who supply Class A drugs in Kent, often exploiting the most vulnerable members of our communities. These teams are responsible for significant increases in charge rates and therefore management of offenders.

Three areas for improvement focus on use of Bail and released under investigation (RUI), the management of registered sex offenders (RSOs) and digital capability and capacity in the area of online child abuse.

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Kent Police has a comprehensive Bail Management policy and clear governance in place. The management of suspects released under investigation is a concern to all forces and a new Bail legal framework is due at the end of 2022. In line with this legal change, the force will review processes and make the necessary amendments to ensure improvements continue to be made.

The management of RSOs is effective, and the PEEL report highlights the force adherence to authorised professional practice (APP), use of sexual harm prevention orders and good awareness of RSOs by local community teams. In order to ensure the provision is as effective as it can be, a review of the structure, resources and capability is being undertaken. This review will also consider the digital capacity and capability of these teams.

Building, Supporting and Protecting the Workforce (Good)

The understanding of ethical policing amongst officers and staff is described as excellent with positive commentary provided on the force's Ethics Committee, Culture Boards and the clear mission, vision, values and priorities, all of which contribute to a positive culture.

The force's commitment and approach to both physical and mental wellbeing is highlighted along with the excellent support provided to staff and this is well documented in the report. The development of officers and staff is identified as effective along with the introduction of the Diversity and Inclusion Academy and the work of the well-established support groups.

No areas for improvement were identified.

Strategic Planning, Organisational Management and Value for Money (Good)

The findings of how efficiently the force operates are positive. Reference is made once again to the positive governance, scrutiny and planning in place, aligned to the force priorities.

The force's Innovation Task Force ensures the infinity principles, which aim to remove boundaries that inhibit innovative thinking, are embraced and alongside evidence based policing techniques seek ways to improve the service provided to the public. In addition, the change management programme known as Zenith, effective collaborative arrangements and use of Microsoft 365 technology means the force is continually achieving efficiency savings and improving productivity.

One area of improvement is made regarding the allocation of resources to meet demand. This is linked to the area of improvement within the core question relating to responding to public and therefore activity detailed within this section would apply.

PEEL Governance.

In order to ensure a robust and transparent regime of governance against the 19 areas for improvement (AFIs) identified within the latest HMICFRS PEEL report, there will be the following tiers of scrutiny: (a) Through the existing Force Improvement Board (FIB), chaired by the DCC, progress against the PEEL Improvement Plan will be routinely discussed, with updates being presented by Business Owners and overseen by a Chief Officer lead; (b) Following each FIB, a 'Chief Constable's PEEL Oversight Board' will be held, with representation consisting of both Deputies, ACC Ayling, Mr Harper (OPCC Chief Executive) and the Force Inspectorate Leads. This will allow the Chief Constable to scrutinise the evidence presented and test outcomes against the AFIs; (c) At the 6 month point, an extraordinary Chief Constable's Oversight Board will be held whereby all Business Owners and Chief Officers will discuss the PEEL Improvement Plan in detail, allowing for further scrutiny and questioning to the Business Owners directly by the Chief Constable; and (d) In addition to the OPCC being represented at the Oversight Boards, the PCC will receive bespoke briefing notes and updates routinely, with a

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view to an input at a future Performance & Delivery Board as required. The Force remains wholly committed to continuous improvement, utilising the Infinity Principles and our priorities of providing a quality service, putting victims and witnesses at the heart of everything we do, and to always do the right thing, as the guiding principles as we move forward.

3.4 HMICFRS Inspection of Serious and Organised Crime

HMICFRS have commenced their national inspection of serious and organised crime across all forces in England & Wales in conjunction with their respective regional organised crime units (ROCU), to gain a comprehensive regional understanding.

On 17 March 2022, Kent were notified that an inspection would take place over two days, namely 19 and 20 April 2022. This inspection activity looked to supplement evidence already obtained earlier in 2021 when serious and organised crime was reviewed as part of the force's PEEL inspection.

Informal feedback provided by HMICFRS was very positive. A thematic report will be published in due course.

4. Internal and External Audit Functions.

4.1 Internal Audits. The Internal Audit Plan for 2021/22 was agreed with management and the Joint Audit Committee in June 2021 but contract discussions meant that work did not commence until September 2021. We have finalised eight reports. We have issued five further draft reports which are expected to be finalised soon, and the fieldwork for the remaining audits is either complete with draft reports expected to be issued soon, or is nearing completion, with the exception of the IR35 Follow Up review which has recently been agreed to replace the IT Disaster Recovery audit and which is currently being scoped.

Audit	Planned start	Sponsor(s)	Status
Risk Management (OPCC)	09/08/2021	Rob Phillips	FINAL
Follow Up – Part One	17/08/2021	Jonathan Castle	FINAL
Gifts & Hospitality	21/08/2021	Jon Armory	FINAL
Estates Strategy – Operation Zenith	06/10/2021	Diane Brady	Draft issued 18/03/22
Debt Collection and Recovery	08/10/2021	David Jedrzejewski	FINAL
Capital Accounting and Fixed Assets	16/12/2021	Vanessa Winter	FINAL
Health and Safety – Contractors	18/10/2021	Diane Brady	DRAFT issued 02/02/22. Client comments received and RSM response sent 03/03/22, awaiting further client response
Pensions and Ill-Health Retirement (Joint)	08/11/2021	Kevin Kirby	DRAFT issued 24/02/22. Client comments received 07/03/22. Revised DRAFT issued 10/03/22
General Ledger	09/12/2021	Matt Bridges	FINAL
IT Audit (Joint) – Airwave	20/12/2021	Jules Donald	Fieldwork in progress, closing meeting scheduled 22/04/22
Creditor Payments	07/01/2022	Jonathan Castle/David Jedrzejewski	DRAFT report issued 05/04/22

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Complaints (OPCC)	01/02/2022	Laura Steward	DRAFT issued 29/03/22
Follow Up – Part Two	01/02/2022	Jonathan Castle	FINAL
Freedom of Information and Subject Access Requests (OPCC)	19/02/2022	Neil Wickens	Fieldwork complete, now in QA
Payroll	15/02/2022	Phil Trebill	Fieldwork completion delayed due to client staff availability. Debrief in the process of being arranged
Procurement (Joint)	24/02/2022	David Jedrzejewski/Jonathan Castle	Fieldwork complete. Initial debrief meeting held 13/04/22, final debrief document expected 22/04/22
Treasury Management	28/02/2022	Matt Bridges	Fieldwork complete, draft report expected w/c 25/04/22
IR35 Follow Up (replacing Business Continuity and Disaster Recovery (Joint))	07/03/2022	Jonathan Castle	Replacement audit being scoped
Anti-Fraud Review	11/03/2022	Rob Phillips	Fieldwork in progress
Medium Term Financial Planning, Budgeting and Control	March 2022	Rob Phillips/Jonathan Castle	Fieldwork nearing completion

Seven audits have been completed so far this year, an additional three since the last report. There are three that are in draft as well as 2 that are still in draft since the last report.

Title of audit	Assurance Level	Report issued	Recommendations		
			Low	Medium	High
Risk Management (OPCC)	Reasonable	04/11/2021	3	2	0
Follow Up Part One	Reasonable	30/11/2021	3	1	0
Gifts & Hospitality	Reasonable	30/11/2021	3	2	0
Debt Collection & Recovery	Substantial	28/01/2022	2	1	0
Capital Accounting and Fixed Assets	Substantial	21/04/2022	0	0	0
General Ledger	Reasonable	21/04/2022	1	1	0
Follow Up – Part Two	Good Progress	21/04/2022	1	0	0
Off Payroll Workers	Advisory	06/01/2022	15 Advisory recommendations		

4.2 External Audit.

Our auditors, EY have completed their 20/21 review and the final accounts are published. Kent Police were confirmed as a going concern, no material errors were found and there were no adjustments to the accounts.

EY have appointed a new Audit Associate Partner and Audit Manager for the 2021/22 audit inspection of the Statement of Accounts. The Walkthrough audit inspection was carried out during April and it is expected the 'on-site' audit inspection will commence in June, but the dates are still to be confirmed. The statutory deadline for the publication of the audited Statement of Accounts is currently 30th September, but it is expected the date will be formally moved back to 30th November.

5. Summary.

The force welcomes and benefits from varying levels of scrutiny and governance. It will continue to strive for further improvements as part of the integrated PEEL assessments. This demonstrates the Force commitment and drive to provide the very best service to victims, witnesses and the people of Kent. The extensive programme of internal inspections also reflects the Force's commitment to provide a quality service across all of the business.