

On 3 October 2017 Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) launched a 12 week consultation on their proposal to introduce Force Managements Statements (FMS) to their inspection of police forces in England and Wales. This document sets out the response to the consultation from the Police and Crime Commissioner (PCC) West Midlands, and we are grateful for this opportunity. Public bodies should consult openly and thoroughly with stakeholders to avoid proceeding with proposals that will lead to adverse outcomes for services and the public.

The response is set out in three parts. The introduction reflects on the statutory context that underpins this response and, in light of this context, provides a definition of efficiency and effectiveness. The response to the consultation is then set out in sections two – principal concerns and recommendations in relation to the design and content of FMS – and three – specific comments on the descriptions set out in the Appendices in the consultation paper.

HMICFRS has an essential role to play in providing evidence to help forces improve and to help assure PCCs and the Home Secretary that police forces are delivering efficient and effective services. Whilst we share HMICFRS's goal of delivering efficient and effective police services, there are fundamental flaws with the proposed approach set out in the FMS consultation paper. The FMS proposal is wrong in law, wrong in principle and wrong in execution. Throughout this response we have put forward recommendations we think will assist HMICFRS and contribute towards their important inspection work.

1. Introduction

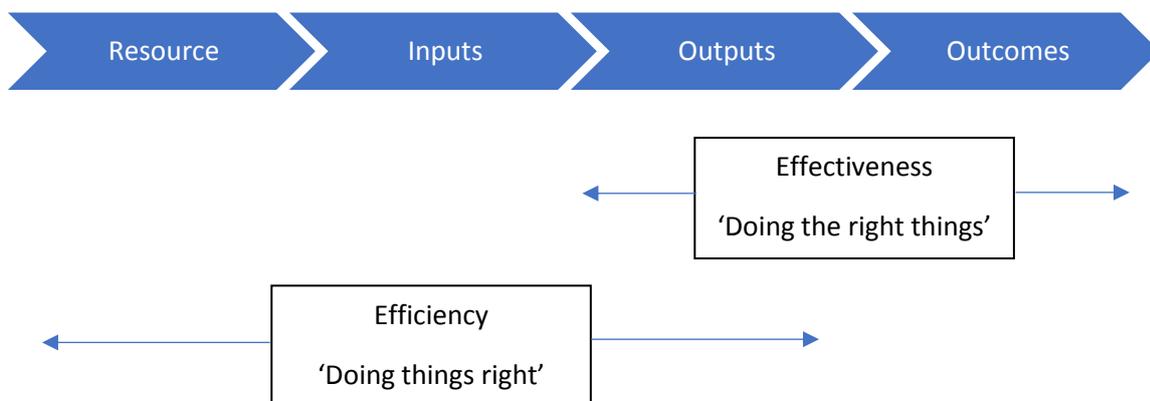
1.1 Statutory Context

1.1.1 The roles of PCCs and HMICFRS with respect to the efficiency and effectiveness in policing are as follows:

- PCCs – Under the Police Reform and Social Responsibility Act 2011 PCCs must secure an efficient and effective police for their area and set the police and crime objectives for their area through a police and crime plan
- HMICFRS – Under the Police Act 1996 the role of HMICFRS is to independently assess and report on efficiency and effectiveness of police forces. HMICFRS is an inspectorate not a regulator so has no powers to give orders for change but is entitled to require any person to provide any information or documents that the Inspector of Constabulary reasonably requires for the purposes of an inspect.

1.2 Efficiency and effectiveness

1.2.1 While the terms efficiency and effectiveness are frequently used they are often poorly defined or used differently by different people. The Public Sector Efficiency Group¹ provides a useful framework for understanding efficiency and effectiveness. Here effectiveness means producing the outputs/carrying out the activities that best contribute to the outcomes you want to achieve, efficiency means producing the most output/carrying out the most activities possible for a given amount of resource.



1.2.2 The information forces present in FMS must provide HMICFRS with information that they need to assess efficiency and effectiveness.

¹ <https://quarterly.blog.gov.uk/2016/01/25/improving-public-sector-efficiency-to-deliver-a-smarter-state/>

2. Principal concerns and recommendations in relation to the proposed design of FMS

2.1 Local democratic accountability

2.1.1 PCCs were introduced to decentralise power and control of policing and restore the connection between police forces and the people they serve. Since their introduction PCCs have made great progress in improving democratic accountability as recognised by the Home Secretary in a recent speech to PCCs and Chief Constables.

Remind yourselves that millions of people voted for you in the PCC elections in 2016. They voted for your plans to keep them safe...You've brought real democratic accountability to British policing and you've shown true leadership.²

2.1.2 The FMS, as described in the consultation document, risks undermining this progress by introducing a set of *de facto* priorities in the form of pre-determined categories of demand against which all forces must report and on which forces will be publicly judged and compared on a national basis.

2.1.3 An analysis of these categories against the West Midlands Police and Crime Plan, which was developed in consultation with the public, shows some clear gaps including in relation to key priorities such as standing up for young people, reducing first time entrants to the criminal justice system, supporting victims and supporting economic development to reduce crime in the long term. Fraud and cybercrime (including prevention) are two further areas where there appears to be little focus within the FMS template.

2.1.4 While HMICFRS state that FMS will make a material contribution to police and crime plans and will not compete with them, further consideration must be given to the risks described above to ensure no such competition occurs.

2.2 Flexibility and innovation in policing

² Speech by Home Secretary Amber Rudd to Association of Police and Crime Commissioners (APCC) and National Police Chiefs Council (NPCC) 2017
<https://www.gov.uk/government/speeches/home-secretary-speech-to-the-apcc-and-npcc-partnership-summit-2017>

- 2.2.1 There are 43 police forces in England and Wales and there will rightly be substantial variation in the priorities and structures across these 43 forces.
- 2.2.2 The policing model a force follows should be adapted to deliver the priorities set by local people, as formalised in police and crime plans, and to fit the local environment and local assessments of threats, harm and risks. This flexibility is essential in order to maximise the efficiency and effectiveness of forces in the unique circumstance in which they operate – the priorities and approach of large metropolitan forces, for example, may not be the same as for rural forces.
- 2.2.3 In setting the categories of demand, as is the case in the proposed FMS template, HMICFRS inadvertently risk constraining the decisions made by Chief Constables on the policing model their forces will follow as the categories set out both *de facto* priorities and organisational structures (e.g. divisions of response and local policing functions). This may also have the impact of dampening innovation, including potentially curtailing existing change programmes such as West Midlands Police’s WMP2020 programme.
- 2.2.4 Police forces should also be agile in responding to changing environment and as understanding of the effectiveness of different approaches and interventions evolves. Incentives and ability to respond in an agile way are reduced when forces are required to report within a fixed, inflexible framework.
- 2.2.5 The consultation document makes clear that the underpinning ideology of FMS is rooted in the view that the private sector is disciplined and that intervention is needed with public sector bodies to replicate this discipline. The consultation states that the FMS proposal is built on Network Management Statements which ‘require of the providers of those public services [which are subject to Network Managements Statements] what private sector enterprises have always had to do, to survive in a competitive environment. They provide a necessary substitute for the disciplines of the private sector’.³
- 2.2.6 We would argue that successful organisations in the private sector are precisely those that understand and respond to the local market and so in introducing FMS HMICFRS should ensure that similar approach in the public sector is not curtailed by a rigid structure of reporting against prescribed categories of demand. It is also at best debateable whether there is evidence from the private sector that a single, common reporting and information management framework yields higher returns, innovation and competitive advantage.

³³ <https://www.justiceinspectors.gov.uk/hmicfrs/publications/force-management-statements-consultation/>

Recommendation 1: The categories of demand should be set and defined at force level to ensure that FMS reflect: local priorities set out in police and crime plans; local intelligence on threat, harm and risk; local structures of police forces and emerging evidence of what works in policing.

2.3 Statutory powers of HMICFRS – use of FMS in inspection

- 2.3.1 The consultation document provides little clarity on how FMS will be used in HMICFRS inspections other than to note that they will be used as part of the risk assessment prior to new Integrated PEEL⁴ Assessments in May to August 2018. The consultation on the methodology for the new Integrated PEEL Assessments does not begin until January 2018 so clarity on how FMS will be used is unlikely before this has concluded.
- 2.3.2 Comparing FMS content to the questions posed by the current PEEL inspections⁵ shows some disconnect. There are a small number of questions which seem to largely underpin the entirety of the FMS exercise, notably the Efficiency question ‘How well is policing planning for the future?’ On the other hand almost all the questions relating to Effectiveness and Legitimacy seem to be poorly served by FMS with very limited coverage of outcome measures and assessment of the impact force activity is having on these outcomes in order to inform judgements of effectiveness.
- 2.3.3 We also have concerns that, rather than FMS being used as data collection tools, the *process* of FMS development and their integration with force budgeting and planning (as described in the consultation document) will become seen by HMICFRS as a ‘gold standard’ and so forces will be judged and graded positively by virtue of following the proposed *process* rather than by virtue of the actual *content* of the FMS.
- 2.3.4 This would be a clear departure from HMICFRS’s role as inspectorate into the territory of regulation. The role of HMICFRS should be to assess whether forces have adequate arrangements in place to manage their efficiency and effectiveness – it is not their place to determine what these arrangements must be. Rather a good inspectorate will highlight diversity of approaches and identify good practice that can be replicated where possible and fitting to do so.
- 2.3.5 Returning to the private sector again, we would contend that the principle discipline of the private sector is that it is *results* driven, not *process* driven. Private companies manage their

⁴ Police Efficiency, Effectiveness and Legitimacy

⁵ <https://www.justiceinspectorates.gov.uk/hmicfrs/our-work/peel-assessments/>

businesses in the best way they see fit to deliver their desired results. It is important that police forces continue to have the freedom to do so as well.

Recommendation 2: The roll out of FMS should be paused until the consultation on Integrated PEEL Assessments is completed and a full description can be provided of how FMS will be used for the purpose of inspection. This will help ensure that HMICFRS have the information they need to inform their new inspection regime.

Recommendation 3: In setting out the role of FMS in inspection HMICFRS must also make clear that forces will solely be judged on the *content* of their FMS as it relates to the question of how efficient and effective the forces are and not on the *process* of FMS development as forces must be free to determine how best to manage their business.

2.4 Statutory powers of HMICFRS – reasonableness of requirements

2.4.1 Given the lack of clarity on the role of FMS in relation to inspections it is challenging to make a judgement on whether or not the information that will be mandated through FMS is only that which is reasonably required for inspection. HMICFRS have argued that FMS ‘will not increase the data demand on forces which are already well-managed’⁶. Even if this were to be proven that all well-managed forces have access to exactly that data set out in the FMS proposal it is not necessarily reasonable for HMICFRS to mandate provision of all this information to them, unless it is all *required* for inspection of efficiency and effectiveness. Nor should it be the case that forces have to submit information in a prescriptive format just for the convenience of the inspectorate if they can otherwise demonstrate evidence against the inspection questions e.g. by submitting existing force management documentation.

2.4.2 This is not just an issue of legality but of ensuring that we minimise the diversion of resources from front line policing into the production of FMS. We note that the FMS consultation includes no regulatory impact assessment concerning the administrative and bureaucratic overhead arising from FMS to test that assertion that there will be a net decrease.

2.4.3 It needs to be recognised that *more* data does not mean *better* data and certainly does not mean better understanding. Public transparency and accountability, for example, are likely to be better served by a concise suite of the most relevant indicators on the basis of which efficiency and effectiveness can be judged.

⁶ <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/force-management-statements-consultation/>

2.4.4 It is our understanding that HMICFRS will also be requesting a quarterly dataset for ongoing monitoring of forces and it is unclear how these two data requests will relate. Consideration should be given to the cumulative impact of these different data requests on already stretched police officers and staff.

2.4.5 The consultation document notes that 'it is often objected that the demands on forces for data are already high. Forces are required to provide information about their activities and their plans to a number of bodies, including local policing bodies, the Home Office, local authorities...' Whilst it is positive that this concern is noted it is unfortunate that HMICFRS do not go on to discuss how they will minimise this demand by working towards alignment at least of some key data demands e.g. the Home Office Annual Data Requirement.

2.4.6 Further the consultation document also notes that, in order to avoid bureaucracy, pilot forces found it more efficient to create a small central team, to coordinate and quality assure FMS assessments from departments, rather than create a large central team to carry out the assessments themselves. It is unfortunate that no further information is provided on the experience of pilot forces as this could help reduce the resource implications of FMS introduction.

Recommendation 4: HMICFRS should provide a lessons learnt report from the FMS pilot so that forces can learn from pilots and minimise the resource burden of FMS completion.

Recommendation 5: HMICFRS should review resource demand as FMS are rolled out and assess the cost/benefit of their introduction.

Recommendation 6: HMICFRS should clarify the 'must have'/'should have'/'could have' indicators within the revised FMS template and work with the Home Office and others to align data requests where possible to minimise the overall data demand on forces.

2.5 Collaboration

2.5.1 As previously mentioned the ideology that underpins the FMS proposal, as set out in the consultation document, is that FMS will 'require of the providers of those public services [which are subject to Network Managements Statements] what private sector enterprises

have always had to do, to survive in a competitive environment. They provide a necessary substitute for the disciplines of the private sector'.⁷

2.5.2 Holding up the importance of *competition* in delivering efficiency and effectiveness is problematic in the context of policing as it risks undermining drivers towards greater *collaboration* and *innovation*, both between different forces and between police and other public services. This has been and will continue to be crucial for ensuring efficiency and effectiveness in the future⁸. It is therefore not clear how FMS both supports and is responsive to the Specialist Capabilities Programme, the National Enabling Programme, the Policing Vision 2025 and the work of the Police Reform and Transformation Board. It is also unclear where nationally provided functions such as the National Ballistics Intelligence Service “sit”.

2.5.3 The importance of collaboration was highlighted by the Home Secretary in her recent speech to PCCs and Chief Constables.

We’re also supporting those of you in the audience who want to deliver greater efficiency and effectiveness through close collaboration between emergency services, to benefit your local communities.⁹

Recommendation 7: The importance of collaboration in delivering efficient and effective police services should be better reflected throughout the FMS e.g. by explicitly requesting that forces provide analysis of the current performance of collaboration agreements with other forces and other public services and of the potential scope for and benefit of further collaboration.

2.6 Demand forecasting

2.6.1 Demand forecasting is important for workforce and resource management. However, it is complex and fraught with uncertainties. There are some key issues with the demand forecasting requirements set out in the FMS template.

⁷⁷ <https://www.justiceinspectors.gov.uk/hmicfrs/publications/force-management-statements-consultation/>

⁸ <https://quarterly.blog.gov.uk/2016/01/25/improving-public-sector-efficiency-to-deliver-a-smarter-state/>

⁹ Speech by Home Secretary Amber Rudd to Association of Police and Crime Commissioners (APCC) and National Police Chiefs Council (NPCC) 2017
<https://www.gov.uk/government/speeches/home-secretary-speech-to-the-apcc-and-npcc-partnership-summit-2017>

2.6.2 The FMS proposal incorporates two types of demand forecasting which we'll discuss separately here.

2.6.3 First, there is the forecasting of the number of crimes or non-crime incidents that actually occur (including those that are not reporting, whether or not forces otherwise become aware of them). Forecasting this is extremely challenging as it is driven not just by preventative policing activities but also by external factors such as demographics, the economy, housing, legislation changes and the weather. The only guidance provided is that the LSE model should be used, although no information on this model or its appropriateness is provided. It is unlikely that producing 43 different models of demand forecasting is an efficient process given the amount of analytical resource this would require. In particular this analysis would require a detailed assessment of the knock on impacts on policing of changes to other public services, e.g. health and education. This would be better looked at a national level, with multiple public services involved, with local forces tweaking any such national analysis to take account of local circumstances.

2.6.4 Secondly, there is a forecasting of demand for certain activities e.g. investigations and call handling. This will depend on the demand forecasting described above but also on the policy and resource decisions made within force (e.g. in relation to dealing with more calls for service at first point of contact). Analysing demand by category rather than explicitly looking at the activities of the police force as a whole risks introducing a silo mentality and missing the knock on impacts of policy or resource changes to one category on demand in others.

2.6.5 Further there are issues with the proposed demand forecasting as:

- by confining forecasting within pre-prescribed categories there is a risks that new and emerging threats are overlooked
- no recognition is made of the relationship between resources and demand. Ongoing concerns, e.g. child sexual exploitation and modern slavery, demonstrate that the more resources dedicated to uncovering crimes the more crime will be uncovered. Certain aspects of demand, therefore, are controllable to some extent. This should be made explicit and demand forecasts interpreted in this light.

2.6.6 Our final concern in relation to demand forecasting relates to requests in the FMS template for forces to assess how well their demand forecasts have performed in the past. The interpretation of such assessment needs to be approached with caution. There are three possible reasons why actual demand might be different to predicted demand:

- demand forecast was inaccurate
- forces have responded to demand forecasts and implemented policies to reduce demand and these have been effective
- external unpredictable events have occurred which have impacted on demand.

2.6.7 It is likely to be very difficult to unpick which one, or combination, of these has led to any discrepancy between actual and forecast demand. It would be unfair if forces were judged to be poor at demand forecasting because they have taken effective action and therefore fewer crimes occur than predicted.

Recommendation 8: National work, with other public services, should be carried out to develop a model to forecast trends in crime and non-crime policing related incidents which forces can then adjust to take account of local circumstances.

Recommendation 9: Recognition both of the interdependencies between demand categories and of the relationship between resourcing and demand for some categories (e.g. protecting vulnerable people and serious organised crime) should be embedded in the FMS.

2.7 Data quality

2.7.1 HMICFRS's Crime Data Integrity inspection programme has highlighted the challenges of producing high quality, comparable data between police forces. There are likely to be comparability issues with many of the indicators required for the FMS as both definitions and measurement approaches will vary.

2.7.2 The trend in recent years has been to reduce the specificity of requirements (e.g. in relation to victims surveys). This is not necessarily a bad thing, forces after all have different priorities and structures so their data needs will be different. However, it does mean that caution needs to be urged in comparing forces including when assigning graded judgements for PEEL inspections.

Recommendation 10: HMICFRS should provide further guidance on definitions and measurement for 'must have' indicators that need to be comparable between forces and limit these so that suitable attention can be given to the improvement of the data quality for these indicators over time.

2.8 Perverse incentives

- 2.8.1 The proposed FMS template as set out in the consultation document includes some explicit targets (e.g. performance against service level agreement for 999 and 101 calls). Implicit targets will also develop as forces are compared with each other or with themselves over time. Historically there have been well publicised issues with targets, including in relation to crime data, as they are vulnerable to gaming and often create perverse incentives.
- 2.8.2 Further there are known issues with performance datasets in that they can lead to a culture of ‘what gets measured gets done’. Forces will be only too aware of the potential reputational damage of negative HMICFRS inspection gradings and so there is a risk that they will organise their business so as to deliver improvements in the measures included in FMS rather than to deliver the priorities of the local people or the activities which new evidence suggests are most effective. As discussed in sections 2.1 and 2.2 this risks undermining the delivery of police and crime plan priorities and of innovation where the results of such innovation is not captured in the FMS

Recommendation 11: HMICFRS should consider the risks related to FMS in terms of gaming and perverse incentives, publish these, and describe how these will be minimised.

2.9 Financial information

- 2.9.1 Efficiency and effectiveness can't be fully assessed without following the ‘golden thread’ from resources to inputs (are forces being economical in their purchasing and workforce management) to outputs (how productive are forces) and finally to outcomes (how effective are force activities in achieving the end goal). A well-managed force will have to make choices in order to maximise delivery of multiple outcomes (priorities) within a fixed pot of resource, which is largely outwith their control.
- 2.9.2 By divorcing finance from the demand categories FMS risks losing this ‘golden thread’. This will make it difficult to interpretation of gaps between demand and ability to meet demand. Substantial gaps in delivery could be due to recent or unexpected jumps in demand, poor performance of staff and assets, or because staff and assets haven't been deployed properly to different priorities and functions. However, there will also be cases were despite gaps in ability to meet demand forces are performing as efficiently and effectively as they can – the only way to address gaps would be to provide more resource. Failure to recognise this risks scapegoating of public services for decisions made by government.

Recommendation 12: Financial information should be embedded across the demand categories.

3. Response to individual Appendices

Given the complexity and scale of the FMS data request, the commentary below can only offer an initial analysis of the issues and potential concerns. Before implementation, more time and engagement is required to assess the suitability of the requested datasets for the intentions behind the FMS. This would at least require a genuine pilot phase.

3.1 Appendix 1: Responding to the public

- Suggest use the term 'requests for service' rather than 'calls for service' to take into account requests made through online reporting and by partners
- Might be better to include vulnerable callers in appendix 4
- Should it be calls 'from or about vulnerable' individuals rather than just calls 'from vulnerable callers'
- Overlap between information in this appendix on initial safeguarding and compliance with domestic abuse/mental health policies and Appendix 4
- Average call answering time might be more appropriate than performance against target particularly for 101. Need to balance need to answer calls promptly with policies to resolve more calls at first contact (including direct recording) where this is shown to be efficient and effective
- Call abandonment for 101 needs to take into consideration introduction of announcements in some forces which aim to divert calls away from 101 (e.g. in the case of a major incident where reports already received, or websites that can be used for provision of information and crime recording)
- Unclear how useful a measure of proportion of incidents resolved without deploying a resource is without breaking down by incident type and characteristics. For some incident types a high proportion might be 'good' if it is most efficient and effective way to deal with such as incident and for others it might be 'bad'
- Need to ensure consistent definition of grade 1 and grade 2 calls
- Not clear why only asking for causes of dissatisfaction in surveys of service users. Important to look at drivers of *satisfaction* as well so that good practice is maintained within force and adopted elsewhere when appropriate
- Workload measure needs to take into account complexity of calls and incidents attended not just volume of calls per FTE or incidents attended per FTE. Volume alone is too blunt and hard to interpret as falls may be due to poor performance or due to policy changes leading to a more complex, lower volume workload.

3.2 Appendix 2: Prevention and Deterrence

- Measuring the performance of prevention activities requires a long-term view e.g. a public health approach
- Context needs to be provided by forces as definitions of community/neighbourhood teams and local policing will differ
- Prevent initiatives to tackle radicalisation may be better placed in Appendix 7 alongside other counter terrorism information
- It is not just demand in this category that will be taken into account when deciding allocation of resources – demand in other categories, priorities in the police and crime plan and availability of resources will also have to be taken into account, this should be recognised
- Not clear whether any requirement to show how force building up use of evidence based practice
- Not clear why information on distribution of demand is being requested
- Unclear why promoting LSE demand forecasting model; what is it and how well does it perform?
- Unclear why use of force and complaints are included as indicators here
- Unclear what satisfaction with 'local policing' means
- As with Appendix 1 should consider points of satisfaction as well as dissatisfaction
- No mention is made of Community Safety Partnerships
- Recent consultation held on cuts to CSEW so need to be cautious about assuming indicators from the survey will be available in future.

3.3 Appendix 3: Investigations

- Unclear what the number/percentage of crimes allocated for further investigation tells you about efficiency and effectiveness –within a fixed resource it might be more efficient and equally effective not to allocate crimes for further investigation to some crime e.g. where distinct lack of evidence
- Useful to incorporate views of other partners, e.g. CPS, as well as victim satisfaction
- Need to specify how compliance against the Victims Code should be measured

- As with Appendix 1 volume per FTE not a sufficient indicator of workload as need to take into account complexity. In an environment of limited resource more likely to have a lower volume, more complex workload
- Performance of custody might benefit from information on use of Appropriate Adults and feedback from Independent Custody Visitors
- Information on DVPOs might be better placed in appendix 4 however need to make sure that information is provided that shows whether these are being used effectively not just whether they are being used
- Doesn't reflect CJS activities in relation to conditional cautions or community resolutions and other diversionary activities. This is particularly problematic as intervention and diversion in relation to repeat but low risk offenders, young offenders and first time offenders which are fully not covered in Appendix 5. The West Midlands PCC and Police are clear that we should promote a culture of early intervention and prevention
- Quality of forensic analysis in terms of errors should be included.

3.4 Appendix 4: Protecting vulnerable people

- Need to recognise that demand in this section is to an extent controllable – the more “stones” turned over the more demand there will be
- Worth trying to separate out *reported* crimes and non-crime incidents from those which were uncovered through force activities. Interpretation needed on volume and effectiveness of work being done to uncover hidden crimes and trends in willingness to report. Trends in hidden crimes need to be treated with caution. We want to increase the proportion that are reported by encouraging victims to come forward and improving trust in police, however, at the same time we want to reduce the actual incidence of these crimes. We therefore need to avoid blunt judgements about whether increases or decreases are reflect ‘good’ or ‘bad’ performance of the force
- Effectiveness assessments should include effectiveness of different Home Office outcomes and interventions e.g. in relation to domestic abuse should include use of DVPP and assessment of their effectiveness
- In relation to mental health more information needed on how good forces are at identifying mental health problems and responding accordingly.

3.5 Appendix 5: Monitoring dangerous and repeat offenders

- This section should be retitled to ‘managing dangerous and repeat offenders’ or ‘managing offenders and reoffending’
- Intervention activities with first time offenders and other ‘non-dangerous’ offenders should be incorporated either within Appendix 2 or here given the importance of early intervention and prevention
- MAPPA differs within force areas so need a lower level of analysis than police force area e.g. local authority
- Reoffending rates should allow for weighting to take into account severity of reoffending e.g. using ONS Crime Severity Scores

3.6 Appendix 6: Disrupting serious and organised crime

- Need to include measures to assess effectiveness of gang injunctions and other orders
- Very challenging to separate out individual forces contribution to regional and national work
- Guidance would be useful on how outcomes in relation to SOC policing activities can be measured.

3.7 Appendix 7: Responding to major events

- Prevention work poorly reflected
- Armed policing should include assessment of appropriateness of any use of force by armed police and complaints in relation to such use of force
- The interface with the HMICFRS counter-terrorism inspection programme

3.8 Appendix 8: Wellbeing

- Employee wellbeing will also be impacted by real wage increases – pay should be captured somewhere
- Sickness absence, while important of itself, is a poor indicator of employee wellbeing. Need to consider stress indicators e.g. workload (accounting for complexity as well as volume), shift pattern analysis, exposure to distressing incidents, gap between establishment and actual resourcing level, as well as refusal of leave and delays in granting leave requests

- Rest days are sometimes voluntarily given up rather than cancelled, this may also indicate times of increased pressure for staff and should be captured
- Absence, stress and refusal of leave etc. can vary considerably across department so forces should be asked explicitly for ranges as well as averages
- For office based staff proportion with a recent DSE assessment could be captured alongside information on provision of specialist equipment e.g. foot rests and chairs
- Forecasting should include assessment of impact of ageing working population and rising obesity levels on the workforce
- Not clear what 'actively monitor physical wellbeing' means
- Other indicators which might be useful include retention rates, length of PSD investigations, outstanding PSD investigations and feedback from exit interviews
- Consideration needs to be given to how this section integrates with and incorporates information for the College of Policing wellbeing strategy and national evidence base e.g. federation surveys.

3.9 Appendix 9: Information and communication technology and information management

- Separating out technology from day to day business of dealing with demand is problematic as efficiency improvements are often driven by use of technology¹⁰. Similarly intelligence is core to daily business so should be better embedded in the other appendices
- What would be useful to compare centrally across forces is spend on ICT as a ratio of total spend
- Better assessment is needed on projected ICT capability requirements, building on demand analysis elsewhere
- Not clear how number of FTEs allocated to intelligence will be interpreted – what does an efficient and effective force look like?

3.10 Appendix 10: Serviceability of other assets

- Collaboration on providing shared HR and other enabling services should be assessed
- Spend on HR and other enabling services as a ratio to overall spend would be useful – though consideration needed of how definitions differ between Forces

¹⁰ <https://quarterly.blog.gov.uk/2016/01/25/improving-public-sector-efficiency-to-deliver-a-smarter-state/>

- Breakdown of staff profile would be more useful as context in the wellbeing section including information on special constables and volunteers
- Performance indicators should be included for HR e.g. vetting times, backlog in processing job adverts and applications
- Performance indicators should be included for professional standards e.g. including timeliness and backlog
- Need to be aware of changing arrangements in relation to PCCs and complaints handling
- Analysis needed of the drivers of change in PSD demand including, for example, use of body worn video
- In terms of estates performance consideration should be given to how forces can feed in analysis of response times when estates arrangements change
- Cost per mile for fleet should be captured
- Consideration could be given to how environmental impact is built in to this section.

3.11 Appendix 11: Finance

- Current performance, and decisions around addressing future gaps in delivery against demand, can only be understood in the context of availability of financial resource so it is unhelpful to separate out finances from other appendices

3.12 Appendix 12: Identification of strategic changes

- Reflections on relative priorities between different gaps in demand and delivery should include explicit role for police and crime plan
- It is unclear whether the plans to address gaps should be a 'wish list', i.e. what the force would do if suitable financial resource was available, or whether it should be bounded from the start by the reality of financial constraints
- No recognition is made of knock on impacts. If resource is given to one category of demand it is likely that cuts will be made to another as forces do not set the overall budget. Analysis of knock on impacts should be included in proposals
- Recognition needs to be made that residual risk may in some cases be unavoidable without additional funding
- Rationale for prioritising certain gaps must be required rather than optional, otherwise it will not be possible for HMICFRS to judge the appropriateness of prioritisation.