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Office of the
**Police & Crime
Commissioner**
West Yorkshire

My Reference: OPCC/MBW/JED

Your Reference:

9 January 2015

The Rt. Hon Theresa May MP
Home Secretary
Home Office
2 Marsham Street
London
SW1P 4DP

Dear Home Secretary

I am writing to you in response to the HMIC PEEL assessment for West Yorkshire, which reported on 27 November 2014. This response also covers the Crime and Police Integrity and Corruption reports issued on the same day and which were also incorporated into the overall PEEL assessment.

Firstly, I would like to welcome the way that the assessment provided a more balanced view of policing in West Yorkshire, pulling out positive as well as other findings, and using a narrative which reflected this. The challenge that the police and partners face here in helping make communities be and feel safe cannot be underestimated and hopefully the assessment provides this picture to those who view the results. I also found the website to be simple to use, and know that colleagues from the Police and Crime Panel were also of that opinion. I do have concerns, however, about the inclusion of Crime Survey for England and Wales data from March 2013 when data is available at time of publication for the 12 months to June 2014 – I did raise this with HMIC as an issue when commenting on the draft PEEL assessment along with some other suggestions that would aid public understanding however was disappointed that this was not addressed. At a time when public faith in crime figures is questioned, using out of date information will not help.

As the assessment contained findings from inspections that took place earlier in the year, as well as more recent reports, progress has been made to address some of the issues HMIC found. I would like to take this opportunity to detail some of this work for you below:

- Domestic abuse – the earlier HMIC inspection in April 2014 provided some criticism of how the police handled domestic abuse. I was pleased to see recognition in the crime inspection report as some of these issues had been addressed, and that *“WYP is effectively managing domestic abuse investigations, and that investigation supervision is good with positive action*

taken in nearly all cases". My office have also been working on strands of work linked to domestic abuse, including: a review into domestic violence provision in West Yorkshire with recommendations for OPCC services is due at the end of December 2014; £1m investment for partners across West Yorkshire to identify how this can be used by partners in all districts working together to tackle domestic abuse and supporting its victims; a group to identify how practice can be shared when undertaking Domestic Violence Homicide Reviews; and a review of current domestic abuse victims' services across West Yorkshire to identify current delivery and gaps. This review will form the evidence base for commissioning of any future services.

- Domestic burglary – the PEEL assessment stated that investigation of other crime types has suffered as a result of the focus on burglary, a focus that HMIC acknowledges in its Crime inspection as “*understandable and working*”. HMIC have also recognised that the police is giving more priority to threats such as child sexual exploitation, trafficking and cyber-crime, all of which are set out in my Police and Crime Plan and have been allocated an additional £3.5m in funding from the core budget. The police have just recruited additional investigators to tackle safeguarding and child sexual exploitation with this funding. I have also raised this with the temporary Chief Constable, and it is felt that the focus on burglary in particular proactive operations and offender management is necessary, as burglars often stray into other crime types therefore this focus also helps reduce other crimes.
- Data integrity – this is something I take seriously as I have stated to you in the past. I now receive the results of internal compliance audits to consider alongside performance figures, which are showing improvement although there is still room to do better. The following activity has taken place since the HMIC inspection:
 - Additional staffing for Gatekeepers for Home Office Counting Rules and National Crime Recording Standards in each district.
 - Policy has been amended to support reports of serious sexual offences being recorded upon receipt of the report, including reports made by others on behalf of victims.
 - The responsibility for making no crime decisions in rape and attempted rape cases is now overseen by the Force Crime and Incident Registrar personally. Previous no crime decisions over the past year have been audited and corrective action taken.
 - Work to look at the role of the joint Internal Audit team and how they can provide assurances that crimes are now being effectively recorded.
- Victim-focussed – I acknowledge HMICs findings that more can be done to achieve a victim-approach to policing in West Yorkshire, despite victim satisfaction in West Yorkshire being higher than the national average (88.4% vs 85.0% to June 2014). I have had reassurances from the temporary Chief Constable that the issues will be addressed. Early work includes the introduction of a new deployment protocol which better assesses the vulnerability, risk and needs of callers, and tailored victim contracts. Despite this it is encouraging that our partners have told HMIC that they feel the police have moved to a more victim-focused and problem-solving based style of policing. In addition to the



above comments I would like to draw attention to the work undertaken by Victim Support researchers, who have completed the mapping of 400 victim support services in West Yorkshire. This is now available to victims on the *Help for Victims* website that I recently launched, supported by Baroness Newlove.

- Integrity and corruption – I consider the PEEL assessment on police integrity and corruption to be another fair reflection of the force’s performance in this area. It is encouraging to see that much of the progress made since previous inspections has been acknowledged by HMIC and that the recommendations are realistic, fair and achievable. I am keen to ensure that West Yorkshire Police achieves and maintains the highest levels of integrity and welcome the findings and recommendations.

My West Yorkshire Police and Crime Plan was heavily influenced by partners and, in essence, is about partners working together to achieve the outcomes and priorities that we would all like for our communities. It isn’t, and cannot, be about the police alone. I would therefore like to advocate more joint working with other inspectorates to look across different partners when conducting inspections rather than focusing solely on the contribution of one organisation. For instance the inspection into domestic abuse that reported in April 2014, while providing police forces and police and crime commissioners with some invaluable feedback, could have benefited from looking across the board and assessing how partners together are addressing the needs and challenges of both victims and perpetrators of abuse. Integrated joint working and delivery with Community Safety Partners is key to keeping communities safe and feeling safe and the inspection regime increasingly needs to acknowledge and reflect this.

I recognise that the PEEL assessment process for this year was interim, and that consultation has been ongoing with partners to shape this for the coming year. I hope that you will encourage HMIC to also take account of feedback received from this interim assessment to help shape future assessments. While I felt the balance of the assessment itself was fair, I have been and continue to be concerned about the burden that the inspection process is placing on West Yorkshire Police and my office, at a time when the police budget is being top-sliced to fund HMIC, IPCC etc. Proper inspections are necessary to provide reassurance to the public and myself that West Yorkshire Police is providing an efficient and effective service, however this has to be undertaken within the context of shrinking budgets and resources, and the emerging threats in the safeguarding world that require complex investigations. As well as the burden of the inspections themselves, I urge HMIC to review the way they report on the inspection findings to minimise the impact on those involved. The data integrity inspection, for example, saw three releases that all saw an impact in West Yorkshire, with the interim national results released in May, the West Yorkshire report in August, and the final national results in October. All three of these releases generated media and public interest, often with the same questions. It does seem that this could perhaps have been undertaken in a different way that could have minimised this impact whilst still providing the public with information that was relevant and informative at the appropriate time.

I hope you have found this feedback helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Burns-Williamson', written in a cursive style.

Mark Burns-Williamson
Police and Crime Commissioner for West Yorkshire