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

My Reference: OPCC/MBW/LW

Your Reference:

23 January 2018

The Rt Hon Amber Rudd MP
Home Secretary
Home Office
2 Marsham Street
London
SW1P 4DP

Dear Home Secretary

HMICFRS Response – HMICFRS Monitoring Process

Thank you for your letter dated 22 December 2017 and opportunity to provide feedback on revisions to the Inspectorate's revised monitoring process. My feedback is as follows:

- 1.1 I welcome the effort to provide clarity regarding the monitoring process, particularly as we move towards a new system of integrated PEEL assessments structured around areas of risk and the implementation of Force Management Statements.
- 1.2 In general, I feel the proposed two-stage processes of Scan and Engage will simplify and clarify the position of each force and attempt to set a supportive tone.
- 1.3 Identifying causes of concern; you outline in steps 2.11 and 2.12 a chronology that communicates a substantiated cause for concern to the Chief Constable followed by the HMICFRS in question informing the PCC. I suggest you may want to include the PCC in your activity to substantiate the cause for concern, given that the PCC may have contextual information that supports or mitigates it, particularly where this involves partnership working.
- 1.4 I particularly welcome the introduction of clarity regarding the process for moving from the Engage phase back to Scan as this is unclear under the current arrangements, however I suggest HMICFRS may benefit from including the PCC in decision making at stages 3.1 – 3.4, as it is possible that the PCC will recognise the performance issue and be in a position to provide contextual information to support decision making. Furthermore, I suggest that paragraph 3.2 (b) is extended to read “.....its capacity and capability, and that of its partners.....”

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- 1.5 Paragraph 4.20 – I am struggling to see a scenario where exceptional circumstances warrant the sending of a letter without first consulting the PCC and suggest this paragraph is removed from the document. Furthermore, if HMICFRS do insist on this approach, for the sake of balance, I feel that it would be necessary for HMICFRS to also publicly acknowledge when the issue has been remedied to their satisfaction.
- 1.6 Appendix A sets out the roles and responsibilities for Scan, Engage and transition phases and I suggest the PCC has a role to play in the transition phases that supports HMICFRS in decision making.
- 1.7 I welcome the references to identifying notable practice and suggest you should give stronger recognition to the fact that HMICFRS are in the unique position of being able to 'scan across the service' and draw attention to practice that may benefit forces prior to any force being escalated to Engage. I would also welcome further clarification on the processes around sharing best practices across forces particularly with respect to the Policing Performance Oversight Group and involvement of related bodies such as the College of Policing, NPCC and APCC.

I hope you have found this feedback useful.

Yours sincerely



Mark Burns-Williamson
Police and Crime Commissioner for West Yorkshire

Copied to:

Chief Constable Dee Collins – West Yorkshire Police