



Association of
Police and Crime
Commissioners

PCC Accountability Framework

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This document supports Police and Crime Commissioners in relation to their statutory function of holding Chief Constables to account for the delivery of an effective and efficient police force.

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1. Executive Summary

This document offers a comprehensive framework for Police and Crime Commissioners (PCCs) and Office of the Police and Crime Commissioner (OPCC) staff to navigate holding to account and scrutiny in a policing landscape. It provides a range of methodologies, from formal governance meetings to thematic scrutiny panels, ensuring robust oversight and transparency of operational policing.

By employing a combination of methods including meetings, scrutiny panels, and community engagement, PCCs can foster a deep understanding of local policing. Moreover, the inclusion of additional guidance resources and supportive scrutiny questions supports the practical implementation of these mechanisms.

The framework highlights the importance of thematic areas, such as ethics and complaints, providing insightful questions to enhance scrutiny. Furthermore, a checklist serves as a valuable tool for self-assessment, ensuring that accountability arrangements are aligned with strategic objectives and legislative requirements.

Practical case studies offer real world examples of successful implementation, reinforcing the relevance and effectiveness of the outlined strategies. Through initiatives such as the trust and confidence surveys in Thames Valley and the analysis of complaints in Cleveland, PCCs can adapt their approaches to meet evolving challenges.

The APCC guidance equips PCCs and OPCC staff with the necessary tools to navigate the complexities of holding to account and scrutiny in policing, fostering transparency, accountability, and community engagement for more effective and responsive policing practices.

2. Introduction

Police and Crime Commissioners (PCCs) were established through the Police Reform and Social Responsibility Act 2011.

This framework uses the term PCC to refer to Police and Crime Commissioners, the Mayor's Office for Policing and Crime (MOPAC), Mayors with PCC functions, Deputy Mayors for Policing and Crime and Police Fire and Crime Commissioners. It is of use to PCCs in both England and Wales as statutory holding to account functions apply equally in both countries. The framework will also be of relevance to Police Authorities and Chairs of Police Authorities.

The key duties of PCCs are mainly set out in three Acts:

- [Police Reform and Social Responsibility Act 2011](#);
- [Police Act 1996 as amended](#); and
- [Policing and Crime Act 2017](#)

The [Policing Protocol Order 2023](#) sets out for all Police and Crime Commissioners and the Mayor's Office for Policing and Crime, Chief Constables, Police and Crime Panels and the London Assembly Police and Crime Panel how their functions should be exercised in relation to each other. PCCs are bound by the terms of the Policing Protocol which sets out key parameters about the relationship between PCCs, Chief Officers and Police and Crime Panels.

PCCs are a key feature of the local democratic landscape and as such their election manifesto brings with it a public mandate to implement the commitments contained within this, with the Police and Crime Plan as a vehicle for this.

The Police Reform and Social Responsibility Act 2011 gives PCCs responsibility for the totality of policing within their force area and for holding the Chief Constable to account for the operational delivery of policing, including in relation to the Strategic Policing Requirement published by the Home Secretary.

A PCC has the legal power and duty to:

- Scrutinise, support, and challenge the overall performance of the force, including against the priorities agreed within the Police and Crime Plan.
- Hold the Chief Constable to account for the performance of the force's officers and staff.

- Hold the Chief Constable to account for the exercise of the functions of the office of Chief Constable and the functions of the persons under the direction and control of the Chief Constable.
- Decide the budget, allocating assets and funds to the Chief Constable; and set the precept for the force area using local schemes of governance which do not fetter the effective financial management of forces and enable the Chief Constable to deliver their role efficiently and effectively.

The PCC must not fetter the operational independence of the police force and the Chief Constable who leads it. Schedule 23 of the Policing Protocol outlines what the Chief Constable is responsible to the public and accountable to the PCC for.

3. Purpose

This framework is designed to support and complement the activity of PCCs and their offices in this critical statutory function. There is no one way in which PCCs hold Chief Constables to account and the format this function takes varies depending on the PCC and the local landscape. It is a PCC's decision around how they hold the Chief Constable to account and what local accountability arrangements look like. This document is designed to aid PCCs in identifying particularly effective ways in which this function can be fulfilled.

Within the framework holding to account and scrutiny functions are both referenced. However, it should be recognised that there is a difference between these two functions.

- **Holding to account** is a statutory function and power of the PCC. This is outlined within the relevant legislation and the Policing Protocol. PCCs, as they are democratically elected, have an electoral mandate to hold Chief Constables to account for the performance of the force's officers and staff and for the exercise of the functions of the office of Chief Constable and the functions of the persons under the direction and control of the Chief Constable, on behalf of the public.
- **Scrutiny** does not hold the same statutory footing, but PCCs can choose to use it as a tool within their overarching accountability arrangements. Scrutiny can be an effective way to provide a more in-depth understanding of what is happening within the police force, review specific areas of focus or interest, review approaches to their own statutory functions or be part of the scrutiny of

force/partner functions (where that meets the ambitions in the Police and Crime Plan and is relevant to the role of the office).

The statutory functions and powers in relation to what a PCC is responsible for are outlined within legislation. These legal duties are predominantly set out in the Police Reform and Social Responsibility Act 2011 and within Schedule 17 of the Policing Protocol Order 2023. Holding to account forms a key part of these functions.

The statutory functions and powers are:

- Set the strategic direction and objectives of the force through the Police and Crime Plan (“the Plan”), which must have regard to the Strategic Policing Requirement set by the Home Secretary (see the APCC Strategic Policing Requirement guidance). The Police and Crime Plan should be issued as soon as possible after an election, but no later than the end of the financial year in which an election is held, cover the PCC’s full term of office, and may be revised at any time. PCCs must seek the views of local people and victims of crime before the plan is issued. (More detail is contained within the [PRSR 2011 c.13 Part 1, Chapter 3, S5](#)).
- Secure the maintenance of an efficient and effective police force for the area.
- Hold the relevant Chief Constable to account for:
 - The functions of the Chief Constable and those under the direction and control of the Chief Constable.
 - The exercise of the duty to have regard to the Police and Crime Plan.
 - The exercise of the duty to have regard to the strategic policing requirement.
 - The exercise of the duty to have regard to codes of practice issued by the Secretary of State.
 - The effectiveness and efficiency of the chief constable’s arrangements for cooperating with other persons.
 - The effectiveness and efficiency of the chief constable’s arrangements for engagement with local people.
 - The extent to which the chief constable achieves value for money.
 - The exercise of duties relating to equality and diversity.
 - The exercise of duties in relation to the safeguarding of children and the promotion of child welfare.
- Hold the police fund and other grants from central or local government. PCCs must set the policing precept for their area which includes a duty to undertake a public consultation and consult local ratepayers before setting this.

- Publish an annual report – in respect of the Police and Crime Plan and progress and performance against this.
- Bring together community safety and criminal justice partners with mutual duties to co-operate and formulate and implement strategies across the police area.
- Commission services and make grants, primarily aimed to tackle crime reduction/prevention, and support victims and vulnerable people, or those affected by crime; and take on responsibility for the emergency services collaboration and for the Fire and Rescue Services¹ (or play a role in local authority fire governance). This last responsibility does not apply to PCCs in Wales.
- Police complaints powers (as in Policing and Crime Act 2017 – Sections 6-8 and Sections 13-24).
- Appoint, manage complaints about, and may suspend and potentially require the Chief Constable to resign or retire in accordance with section 38 of the Police Reform and Social Responsibility Act 2011.
- Appoint a Chief Executive and a Chief Finance Officer.²
- The establishment of an Audit Panel, jointly with the Chief Constable.³
- Must make arrangements for custody visiting to police cells in their area by independent custody visitors.
- Publish information specified by the Secretary of State and information that the PCC considers necessary to enable the people who live in the force area to assess the performance of the PCC and Chief Constable.
- Observe the Financial Management Code of Practice for the Police Service of England and Wales issued by the Secretary of State.

Specified Information Order (SIO)

Additionally, PCCs are required to publish certain information to allow the public to hold them to account and to assist with openness and transparency. The [Elected](#)

¹ In 2017, legislation was passed enabling the transfer of fire and rescue governance from unelected Fire and Rescue Authorities to directly elected PFCCs, subject to Home Secretary approval (legislation for England only).

² To note that for Mayors within Combined Authorities Statutory Officers cover the whole of Combined Authority business, not just policing and crime.

³ To note arrangements may differ slightly within Mayoral Combined Authorities. For example, in West Yorkshire the Audit Committee has oversight of risk and assurance across the organisation, including the Mayor's policing and crime team, and they also have a joint committee with the Chief Constable which focuses solely on the Police and PCC delivery.

[Local Policing Bodies \(Specified Information\) Order 2011](#) and the [Elected Local Policing Bodies \(Specified Information\) \(Amendment\) Order 2021](#) ('the amending Order) outline what PCCs should publish and specifies that this information should be published in a prominent place on the elected local policing body's website.

The following information must be made available to the public:

- Who the PCC is and what they do.
- What they spend and how they spend it.
- What their priorities are.
- How they make decisions.
- What policies and procedures govern the operation of the PCC.
- Lists and registers, including register of interests which conflict with the role of PCC, list of FOI requests received and responses and list of all gifts/donations and hospitality offered to the staff of the OPCC.
- National Policing Priorities – PCCs should provide a statement on the contribution of their force to achieving improvements against those priorities.
- Most recent HMICFRS force-level report on the effectiveness, efficiency and legitimacy of the police force and the summary assessment of the performance of the police force.
- Most recent IOPC quarterly complaints data for their force and the IOPC annual statistics report, alongside a narrative setting out how the PCC is holding the Chief Constable to account, and the PCC's assessment of their own performance in carrying out their other complaints handling functions.

PCCs may also wish to consult the Government's [Guidance for PCCs on publishing information](#) which provides more detail on these requirements.

4. Principles of Holding to Account and Scrutiny

Effective holding to account and scrutiny relies on a number of practices and underpinning good holding to account and scrutiny are some key principles which can support this function. As there is no statutory guide for PCCs as to what holding to account and scrutiny should look like we have outlined some principles which may assist in helping to articulate how this function is carried out locally. These are guiding principles, and they align with those used within the wider public sector, for example in local authorities' overview and scrutiny arrangements.

The Centre for Governance and Scrutiny⁴ and the Government's Overview and scrutiny: statutory guidance for councils and combined authorities⁵ outlines that scrutiny should:

- Provide constructive 'critical friend' challenge.
- Amplify the voices and concerns of the public.
- Be led by independent people who take responsibility for their role.
- Drive improvement in public services.

These are overarching principles which can be adapted and applied to PCC holding to account and scrutiny activity.

There are additional principles which can further assist in the delivery of effective holding to account and scrutiny arrangements namely:

- A commitment to openness and transparency.
- Getting the balance right between challenge and support.
- Creating a culture that supports strong scrutiny and holding to account, for example by ensuring that everyone understands their roles in relation to these functions and that there is collective ownership and leadership of these functions both politically and at managerial levels.

⁴ [CfPS-Good-Scrutiny-Guide-v4-WEB-SINGLE-PAGES.pdf \(cfps.org.uk\)](https://www.cfps.org.uk/wp-content/uploads/2019/03/CfPS-Good-Scrutiny-Guide-v4-WEB-SINGLE-PAGES.pdf)

⁵ [Overview and scrutiny: statutory guidance for councils and combined authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/674242/Overview_and_scrutiny_statutory_guidance_for_councils_and_combined_authorities.pdf)

- Ensuring holding to account and scrutiny is a constant process (and not a one off) and is something which is everyone’s responsibility.
- Ensuring that scrutiny, holding to account arrangements, work plans and programmes support the delivery of local priorities.
- Activity should have a clear role and purpose. Activity should be monitored and identify changes which have been made, the impact of these and where activity has helped to improve police performance.
- Clear plans and schedules, but with the flexibility to respond to emerging issues or urgent activity.
- The ability to access good quality information and data from the police e.g. performance, financial, risk, complaints, inspection reports. This is important as a lack of access to information and data can undermine the ability to scrutinise performance.

5. Methods of Holding to Account and Scrutiny and evidence sources to support this

PCCs use a combination of methods to hold their Chief Constable (CC) to account and scrutinise their activity, to enable them to build an in-depth understanding of what is taking place in their local police force. Outlined below are a number of key mechanisms, the format these can take and suggestions for how these could be used.

Appendix B includes case studies to demonstrate the application of some of the methods outlined in this section and real-world examples of how PCCs carry out holding to account and scrutiny.

Method / evidence	What could this be?	How can this be used?
Meetings	Performance Reviews between PCC and CC 1:1 between PCC and CC	Scheduled items, e.g. finance / performance at accountability meetings, are a chance to formally

Method / evidence	What could this be?	How can this be used?
	<p>Public Accountability meetings / Boards</p> <p>Formal governance meetings between PCC/CC</p> <p>Meetings with DCC and other senior officers</p> <p>PCC / OPCC representative attendance at Force performance / governance meetings (this should be agreed between the PCC and the force and there should be an agreement about the parameters of their role in attending meetings e.g. this is to assist in gaining assurance and overall understanding of what is taking place within the force)</p> <p>Audit Committees</p> <p>Ethics Committees / Panels</p>	<p>ask questions of the Chief Constable.</p> <p>Provide opportunity to communicate to the public around what holding to account arrangements look like and demonstrate activity taking place around holding to account.</p> <p>Provides opportunity to get insights from other senior officers relating to the performance of the force.</p> <p>Assurance via attendance at meetings and the ability to pick up on potential concerns at an early stage.</p> <p>Audit Committees provide assurance around processes, the handling of public finances and risk management policies and identify potential areas of concern.</p> <p>Ethics Committees provide additional insight / expertise e.g. checking policies and processes to see whether they bring up any 'ethical' issues, which are beneficial to overall holding to account functions.</p>

Method / evidence	What could this be?	How can this be used?
Codes of Governance	<p>Annual governance statement</p> <p>Code of corporate governance</p> <p>Scheme of consent and delegations</p>	<p>Defines roles of PCC and Chief Constable and ways of working.</p> <p>Outlines ways of working together and delineates responsibilities.</p> <p>Outlines how/ways the CC will be held to account.</p>
Scrutiny Panels (list is not exhaustive and there may be other scrutiny panels which take place locally)	<p>Stop and Search Panels</p> <p>Body Worn Video Panels</p> <p>Custody Detention Panels</p> <p>Out of Court Disposal Scrutiny Panels</p> <p>Use of Police Powers Panels</p> <p>Domestic Abuse (DA) Scrutiny Panels</p> <p>Rape and Serious Sexual Offences (RASSO) Scrutiny Panels</p> <p>Violence Against Women and Girls (VAWG)⁶ Scrutiny Panels</p>	<p>Independent members identifying issues of concern within relevant areas.</p> <p>Using findings to undertake scrutiny deep dives.</p> <p>Providing assurance that police powers etc. are being used fairly and proportionately.</p> <p>Identifying areas where there may need to be changes to policy or processes or where there might be a training need.</p> <p>Independent voice provides different perspective.</p> <p>Assurance to the public.</p> <p>Looking at equality and diversity and how policies and processes etc.</p>

⁶ VAWG refers to a range of crimes including domestic abuse, rape and other sexual offences, stalking, so-called 'honour'-based abuse, Female Genital Mutilation, forced marriage, revenge porn, upskirting and sexual harassment which disproportionality impact women and girls.

Method / evidence	What could this be?	How can this be used?
		<p>impact on groups with protected characteristics.</p>
<p>Independent Custody Visitor (ICV) Schemes</p>	<p>ICV feedback forms</p> <p>ICV volunteer feedback e.g. through meetings / informally / raising of concerns</p> <p>Custody Record Reviews</p>	<p>Provide assurance around custody and practices within custody.</p> <p>Identify where there may be training needs.</p> <p>Form part of the independent scrutiny of custody e.g. via scrutiny panels.</p>
<p>HMICFRS</p>	<p>Force PEEL assessment</p> <p>Thematic HMICFRS inspection</p> <p>HMICFRS local inspector</p> <p>Hot debriefs (if invited)</p> <p>HMICFRS force liaison</p> <p>Joint Inspections i.e. between police and probation</p> <p>JTAI (Joint targeted area inspections)</p> <p>Rolling inspection programmes – certain areas, e.g. child protection</p> <p>HMICFRS Super-Complaints</p>	<p>Areas that ‘require improvement’ indicate where particular focus needs to be given in relation to holding to account / scrutiny.</p> <p>Look at national recommendations to see if applicable locally.</p> <p>Opportunity to use learning to inform local holding to account activity.</p>

Method / evidence	What could this be?	How can this be used?
Independent Office for Police Conduct (IOPC)	<p>IOPC learning recommendations</p> <p>IOPC annual reports</p> <p>IOPC Police Complaints Information Bulletin</p> <p>Thematic reports</p> <p>IOPC Impact Report</p> <p>Meeting / engaging with IOPC regional liaison</p>	<p>Assess learning recommendations/thematic reports / annual reports etc. to see if applicable locally.</p> <p>Information bulletins set out performance against a number of measures and compares force results to their most similar force (MSF) group (where applicable) and with the overall result for all forces (national).</p>
Complaints data / information	<p>Force complaints data</p> <p>Independent Office for Police Conduct (IOPC) data</p> <p>PCC Complaint review data</p> <p>Complaint Dip Sampling</p> <p>Meetings with Professional Standards departments</p>	<p>Triangulate complaints data with other performance information, finance information and risk registers, to take a comprehensive view of the performance of a given service.</p> <p>Common themes which are being raised in complaints – indicating areas which may need further investigation.</p> <p>Number of complaints and outcome of complaints – what do these tell you?</p> <p>Disproportionality – assessing complaints data for evidence of disparities / disproportionality.</p>
Performance data	Police performance data	Triangulating data – using it alongside other sources of evidence.

Method / evidence	What could this be?	How can this be used?
	<p>Digital Crime and Performance Pack</p> <p>Foresight (national platform hosted by Lancashire)</p> <p>National policing priorities</p> <p>Early Warning System</p>	<p>Identifying themes emerging - seeing whether different evidence sources, e.g. feedback, commissioned services, stakeholders agree / correspond & are identifying similar trends.</p> <p>Disproportionality – assessing performance data for evidence of disparities / disproportionality.</p>
<p>Surveys / consultations</p>	<p>Crime Survey England and Wales</p> <p>Local surveys e.g. feelings of safety</p> <p>Policing precept consultation</p> <p>Police and Crime Plan Consultation</p> <p>Trust and confidence surveys</p>	<p>Are there any themes coming up in surveys e.g. particular areas where people are raising concerns that would benefit from additional focus?</p> <p>Identify public priorities and what matters to local communities.</p> <p>What are those with protected characteristics saying? E.g. do Black communities or women feel less safe?</p>
<p>Community engagement / feedback</p>	<p>Correspondence</p> <p>Freedom of Information requests</p> <p>Social media</p> <p>Community events</p> <p>Planned engagement sessions on specific topics</p>	<p>What is being raised in terms of priorities and concerns?</p> <p>Identification of themes and trends arising from correspondence.</p> <p>Opportunity to delve deeper into an area via direct engagement with local communities.</p> <p>Casework / events / focus groups / engagement etc. all have the</p>

Method / evidence	What could this be?	How can this be used?
	<p>Local initiatives such as apps where the public can feed in their views directly</p> <p>Visits to community groups</p> <p>Victim Engagement Forums</p> <p>Focus Groups</p> <p>Special interest groups</p> <p>Young Ambassadors engagement / consultation</p> <p>PCC Casework</p>	<p>potential to raise issues which can help to inform accountability work.</p>
<p>Partner engagement / feedback</p>	<p>Commissioned / grant funded services</p> <p>Community Safety Partnerships</p> <p>Local Councillors / MPs</p> <p>Health services</p> <p>Local authorities</p> <p>Voluntary Community and Social Enterprise (VCSE) organisations</p> <p>Local Criminal Justice Boards</p> <p>Public Service Boards (in Wales)</p>	<p>What are partners saying about the police? Are there any concerns which have been raised repeatedly which may need addressing?</p>

Method / evidence	What could this be?	How can this be used?
Reports / briefings	<p>Ad hoc briefings on certain topics, e.g. in response to national issues</p> <p>National reports / reviews</p>	<p>Briefings help provide more context / information regarding an issue and assist in providing assurance.</p> <p>National reports and reviews can bring areas to light that you may wish to explore more locally.</p>
Police and Crime Plans / Policing Plans	<p>Performance frameworks / dashboards for performance which outline progress against the Police and Crime Plan and / or the Policing Plan</p> <p>Priorities within plans</p> <p>Delivery plans</p>	<p>Keep on track in terms of what is being delivered locally and how police are contributing to delivery of the Police and Crime Plan.</p> <p>Look at whether priorities are being met and, if not can you identify the reasons why.</p>
Commissioned / grant funded services	<p>Commissioned Victims service provider</p> <p>Specialist victim support services</p> <p>Domestic abuse services</p> <p>Sexual violence services</p> <p>Helplines</p> <p>Other services funded via the PCC e.g. via community safety funding</p> <p>Victim/Witness Advisory Panels</p>	<p>What does data / feedback from your commissioned services tell you?</p> <p>What are staff saying about the police support?</p> <p>What are victims saying?</p> <p>Can it help identify any causes for concern / issues e.g. responding, certain crime areas, satisfaction etc.</p> <p>Grant / services monitoring information.</p>

Method / evidence	What could this be?	How can this be used?
Finance Governance / information	Accounts – Revenue and Capital Monitoring Annual statement of accounts Budgets External Audit findings/VFM arrangements HMICFRS Value for Money Dashboards	Is the force providing value for money (VFM)? Are work programmes being delivered within budget? What is funding raised through the precept used for? Is it what the public have been told it will be spent on?
Police and Crime Panel *to note the Police and Crime Panel provide support and scrutiny to locally elected PCCs ⁷ . Through their role they may have insights which can be utilised as part of the PCCs overall holding to account arrangements	Raise areas which are of concern to their local residents / themselves as local councillors within the police force boundaries in relation to policing	Does this information correspond with information from other sources? E.g. are some of the concerns coming up in correspondence, complaints, with local communities etc.

⁷ The Police and Crime Panel’s role does not extend to scrutinising or holding the Chief Constable to Account. See [Home Office Guidance for Police and Crime Panels](#) for more about their role.

Method / evidence	What could this be?	How can this be used?
Police Officers and Staff	<p>Staff associations (Police Federation, Police Superintendents Association)</p> <p>Trade unions</p> <p>Staff networks (e.g. National Black Police Association)</p> <p>Whistleblowing reports (if received by the OPCC)</p>	<p>Sense check what is happening within the police force / what is taking place on the frontline.</p> <p>Identify workforce concerns about any areas.</p> <p>Soft intelligence about what is happening within the force.</p>

Using Data to Hold Chief Constables to Account

Data analysis can be used to effectively monitor police performance and hold forces to account. Data provides a tangible overview of areas of interest within the police force and enables PCCs to track changes over time. By monitoring and analysing data, PCCs can answer questions, and address pertinent matters such as whether the police force is improving or regressing in handling specific types of crime, or whether there are particular areas where the force falls behind in comparison to other similar forces.

Given the diversity of data analysis capabilities across OPCCs, the following serves as a preliminary guide to aid in data analysis with the objective of holding police forces to account. Furthermore, acknowledging the varying levels of accessibility to force data among PCC offices, **Appendix C** offers guidance on publicly available data sources that can be used, along with strategies for effectively analysing this data.

6. Additional Guidance

There is a range of additional guidance which can assist PCCs and OPCCs in carrying out and developing their local holding to account and scrutiny functions. The list below links to guidance and information which may be of use when developing and reviewing local holding to account and scrutiny functions.

- [What you need to know as a PCC \(apccs.police.uk\)](https://apccs.police.uk)
- [APCC Equality Framework](#)
- [APCC & NPCC Custody Detention Scrutiny Panels Guidance](#)
- [APCC Strategic Policing Requirement Guidance](#)
- PCC and Chief Constable Accountability Guidance (members' section, APCC website)
- APCC Preventing Deaths in Custody Guidance
- APACE Holding to Account Toolkit
- Home Office Community Scrutiny Panel Guidance
- APCC Engage Toolkit

7. Thematic Areas

Supportive scrutiny questions have been developed for several thematic areas. These are designed to supplement and enhance local scrutiny and holding to account activity.

Currently the themes covered are:

- Code of Ethics including the Code of Practice for Ethical Policing.
- Scrutiny of Professional Standards Departments.
- Performance – including questions on 'general' performance, the crime types (serious violence, neighbourhood crime and within the Early Warning System and Engage (the last are included within the APCC Engage Toolkit).
- Violence against women and girls (VAWG). These cover Operation Soteria, the National Police Chiefs Council VAWG Framework and the Government's End-to-End Rape Review.

- Vetting.
- Complaints.
- [APCC Equality Framework](#).

These themes will be added to and developed over time. All documents can be found in the [members section of the APCC website](#).

8. Checklist – to assist with a review of Holding to Account and Scrutiny Arrangements

Area	Considerations	Self-assessment
Clearly defined strategic direction	Do policing priorities reflect / reference the Police and Crime Plan? Do the PCC and CC have 'shared' priorities?	
Role of the PCC and Chief Constable clearly articulated and understood	Scheme of Governance / Code of Corporate Governance Is there a regular annual review of arrangements to ensure they are working?	
Plan in place that supports / identifies areas for activity / scrutinising	Are deep dives into specific areas carried out? If yes, are there processes in place to ensure recommendations are monitored and implemented? What is the internal capacity to support holding to account and	

Area	Considerations	Self-assessment
	<p>scrutiny activity? How do they make best use of resources?</p> <p>How are areas for scrutiny identified? E.g. is this through performance data / the Police and Crime Plan / the police?</p> <p>Where is all the information arising from holding to account / scrutiny activity pulled together? Is there a view across the organisation which brings together all insight in one place?</p> <p>What does your work programming and planning look like?</p>	
<p>Governance arrangements in place to support holding to account and scrutiny functions</p>	<p>Are these arrangements understood by all partners?</p> <p>Are the right people represented on them to affect change?</p> <p>Are governance arrangements regularly reviewed to ensure they are still appropriate and effective?</p> <p>How do findings from scrutiny panels inform holding to account activity?</p> <p>Formal meetings: what comes out of these and how are actions / recommendations implemented and monitored? What is on agendas? How do you plan for</p>	

Area	Considerations	Self-assessment
	<p>these? Schedule these? Are there certain areas e.g. finance / performance / risk that you schedule regularly?</p> <p>Have you considered transparency considerations, such as public meetings or live streaming? Or, if not a public meeting, how you can communicate to members of the public what is taking place within these meetings?</p> <p>Informal / private meetings – can a note be taken to keep a record of any pertinent areas which need to be followed up? Do senior staff attend these? How is information from these used to inform holding to account / scrutiny activity?</p>	
<p>Performance scrutiny, analysing data to monitor performance and identify potential issues which need to be escalated and addressed</p>	<p>Are there escalation policies or processes in place for when there are potential concerns arising through the data?</p> <p>What are the data sharing arrangements? Have you considered an MOU for information and data sharing?</p> <p>How is performance scrutiny linked to risk management processes?</p>	

Area	Considerations	Self-assessment
	<p>How is the scrutiny of performance articulated in your accountability arrangements?</p>	
<p>Ability to respond to new and emerging issues which may require additional holding to account and scrutiny</p>	<p>Are local arrangements flexible e.g. do they have the ability to add to internal accountability meeting agendas?</p> <p>How are emerging issues picked up and identified? What processes are in place to ensure they can be responded to?</p>	
<p>Complaints</p>	<p>What does complaints data tell you? What are the themes coming out of complaints? Is it identifying areas / officers which have been complained about?</p> <p>Arrangements for working with and scrutinising PSD – what do these look like?</p> <p>How are findings from complaints used to influence change and improve practice?</p> <p>Does dip sampling of complaints take place?</p> <p>How do complaint reviews, and findings from these, contribute to holding to account?</p> <p>Are there any independent methods in place to support</p>	

Area	Considerations	Self-assessment
	<p>scrutiny of complaints e.g. Complaints Scrutiny Panels?</p>	
<p>Audit Committee and how this influences holding to account and scrutiny</p>	<p>How are findings filtered into the wider accountability model?</p> <p>Where there are shared themes across audit and other accountability meetings are these overlaid?</p> <p>How are you monitoring reporting by Internal Audit Teams of internal audit reviews with limited assurance?</p>	
<p>Risk management</p>	<p>How are risks monitored and managed? Is there an internal risk register?</p> <p>Are you aware of the forces' risk management techniques / processes? Are risks shared with the PCC/OPCC? Is there joint understanding of risks?</p> <p>How are emerging issues identified and responded to?</p> <p>How are risks and issues distinguished between?</p> <p>How do you review and consider significant litigation and claims against the Police?</p>	

Area	Considerations	Self-assessment
Information Governance	<p>Do you review relevant reports from the Information Commissioner’s Office?</p> <p>Have you considered reviewing FOI disclosures by the Police to triangulate information or consider risk?</p>	
Community / partner engagement feedback informs activity	<p>Does partner insight and evidence form part of your accountability work?</p> <p>How do you use intelligence from partners to inform scrutiny?</p> <p>What partners do you engage with and get information from e.g. Community Safety, NHS? Could this be extended?</p> <p>What sort of feedback do you receive / procure from them?</p>	
Legislative requirements met (as outlined in the Policing Protocol)	<p>How is the PCC holding the Chief Constable to account for the areas outlined in the protocol?</p> <p>Are you meeting the legislative requirements on PCCs e.g. publication of a Police and Crime Plan / Annual report?</p>	
National reports, reviews, and consultations	<p>How can you obtain assurance that forces are responding or considering national findings or important reports with far</p>	

Area	Considerations	Self-assessment
	<p>reaching implications e.g., Baroness Casey Review.</p> <p>How can you get assurance that concerns / issues / recommendations identified in national reports are being responded to, or considered, locally?</p> <p>What learning is there from national reports / reviews which could be applied locally?</p> <p>Can these reports be incorporated as part of your local accountability arrangements / mechanisms?</p> <p>What risks and opportunities do findings present locally? Are there chances to review local policies / procedures for example?</p> <p>On the publication of national thematic reports what is your response to the police, e.g. do you ask for a briefing on relevancy locally, take this to appropriate meetings etc.?</p>	
<p>HMICFRS Inspections</p>	<p>Are there regular catch ups / meetings with the relevant HMICFRS Inspector?</p> <p>How is progress re: responding to HMICFRS inspections and</p>	

Area	Considerations	Self-assessment
	<p>recommendations monitored and reported on to the PCC? Does this form part of the local governance arrangements?</p> <p>Has consideration been given to implementing a 'protocol' around how the PCC and CC will work together in relation to HMICFRS?</p> <p>PCC responses to HMICFRS inspections (S55 responses)</p>	
IOPC	<p>Are there regular meetings with the relevant Oversight liaison and regional director?</p> <p>How are the findings of IOPC investigations and reviews shared with the PCC?</p> <p>How is progress responding to IOPC recommendations monitored and reported on to the PCC?</p> <p>Do IOPC recommendations and responses to these form part of your mechanisms around holding the force to account in relation to complaints?</p>	
Specified Information Order met and information easily accessible	Have you published the most recent IOPC quarterly complaints data for your force? Have you published the IOPC annual statistics report?	

Area	Considerations	Self-assessment
	<p>Have you produced a narrative setting out how the PCC is holding the chief officer to account for complaints handling?</p> <p>Have you produced and published an assessment of the PCC's performance in carrying out their complaints handling functions?</p> <p>Has the force shared an assessment of their performance against national policing priorities? Has the PCC produced a statement on the contribution of their force to achieving improvements against those priorities?</p> <p>Have you published the most recent HMICFRS force-level report on the effectiveness, efficiency, and legitimacy of the police force?</p> <p>Have you published the summary assessment of the performance of the police force?</p>	
<p>Public information outlining how accountability functions are being undertaken, informing members of the public how they</p>	<p>How accessible is the information shared about accountability? Is there anything on your website which outlines how this takes place and your role in holding the Chief Constable to account?</p>	

Area	Considerations	Self-assessment
<p>can get involved or find out more and that supports the ability of people who live within the PCC area to assess the performance of the PCC and Chief Constable</p>	<p>How can local people get involved in your work?</p> <p>Where are opportunities advertised?</p> <p>How do you communicate information about activity you are undertaking and what is happening within your local area?</p>	
<p>Equality and Diversity</p>	<p>Have you considered using the APCC Equality Framework?</p> <p>Do you understand disproportionality and disparities?</p> <p>Are there plans in place locally, e.g. a Race Action plan to address systemic barriers and issues?</p> <p>Are there scrutiny groups in place considering equality and diversity?</p> <p>Do you undertake Equality Impact Assessments (EIA)?</p> <p>Have you considered how the Chief Constable is meeting the requirements of the Public Sector Equality Duty?</p>	
<p>Ethics</p>	<p>Are you holding the Chief Constable to account for the Statutory Code of Practice for</p>	

Area	Considerations	Self-assessment
	<p>Ethical Policing – including the duty of candour?</p> <p>How do you consider ethics and the provision of an ethical police force and culture in your accountability arrangements?</p> <p>Is Ethics referenced within strategies, for example the Police and Crime Plan?</p>	

APPENDICES

Appendix A: Glossary of terms and abbreviations

APCC – Association of Police and Crime Commissioners

CC – Chief Constable

DCC – Deputy Chief Constable

HMICFRS – His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services

HMICFRS independently inspect and report on the efficiency and effectiveness of police forces – in the public interest. They inspect police forces across England, Wales and Northern Ireland. In 2017, they took on inspections of England’s fire and rescue services, inspecting and reporting on their efficiency, effectiveness and people.

MOPAC – Mayor’s Office for Policing and Crime

MSG – Most Similar Groups

HMICFRS most often uses England and Wales (sometimes referred to as national) averages or Most Similar Groups (MSGs) to provide comparators for policing data.

MSGs are groups of police force areas that have been found to be the most similar to each other based on an analysis of demographic, social and economic characteristics which relate to crime. With the exception of the City of London Police (for which it was not possible to identify any most similar forces), each force area has its own group of up to seven force areas to which it is ‘most similar’.

ICV – Independent Custody Visting

IOPC – Independent Office of Police Conduct

The IOPC are the independent complaints watchdog for England and Wales. They oversee the police complaints system and investigate the most serious matters relating to police conduct, including deaths following police custody and set the standards by which the police should handle complaints. They also share learning to improve police practices.

OPCC – Office of the Police and Crime Commissioner

PCC – Police and Crime Commissioner

PFA – Police Force Area

PFCP – Police, Fire and Crime Panels

The Police, Fire and Crime Panels have a wide remit to review or scrutinise decisions made, or other action taken, by the PCC in connection with the discharge of the commissioner’s functions. Panels have oversight of the PCC’s key documents, decisions and reports, requiring them to provide information and answer any questions which the panel considers necessary. They make recommendations on the Police and Crime Plan and annual report, which the PCC must take account of and respond to. Where the PCC has responsibility for fire, they will consider the Fire and Rescue Plan.

PSD – Professional Standards Department

SIO – Specified Information Order

VAWG – Violence Against Women and Girls. This refers to a range of crimes including domestic abuse, rape and other sexual offences, stalking, so-called ‘honour’-based abuse, Female Genital Mutilation, revenge porn, upskirting and sexual harassment which disproportionality impact women and girls. [Page break?]

Appendix B: Case Studies

CASE STUDY: Thames Valley

Theme: Trust and Confidence

Objective/process: Thames Valley OPCC is developing work with the objective of improving their understanding of local trust and confidence in the police and to aid the PCC with holding Thames Valley Police to account. This work is being developed in conjunction with, and using resources from Thames Valley Police, including working with Thames Valley Police’s Evidence Based Policing Specialist, who brings academic insight into the programme around what influences public trust and confidence in the police. The long-term ambition is to increase the public’s trust and confidence in the police.

The first stage of the work involved undertaking a ‘snapshot’ trust and confidence survey that provided an overview of local trust and confidence. Results, expected early in 2024, will help them to inform the development of a local Trust and Confidence Strategy. Thames Valley OPCC will undertake an annual survey to track

changes and themes over time. The PCC has funded a Trust and Confidence Support Officer to support delivery of this work, and other key areas of work relating to trust and confidence, such as the Race Action Plan and the VAWG Strategy. This role will be central to ensuring scrutiny arrangements for the OPCC / TVP work effectively and will progress action plans arising from the survey work being undertaken.

Outcome: Improved local understanding of residents' trust and confidence in the police and identification of areas of policing that require further PCC/OPCC scrutiny and focus.

CASE STUDY: Bedfordshire

Theme: Transparency (Publication of Information)

Objective/process: All OPCCs must comply with the [Specified Information Order](#), however Bedfordshire OPCC go beyond compliance and publish as much information as possible and an additional [information document](#).

They publish information about individual functions within the OPCC to ensure transparency and accountability across the board:

For Commissioning they publish:

- [Bedfordshire PCC Commissioning Strategy](#)
- [Bedfordshire PCC Commissioned Services](#)

For Governance and Transparency, they publish:

- [Bedfordshire PCC Transparency Reports](#)
- [Bedfordshire PCC Newsletters](#)
- [Bedfordshire PCC Performance and Governance Board](#)

The regular [PCC and Chief Constable Accountability meetings](#) are also recorded and published.

Bedfordshire additionally publish the following information in relation to their volunteer schemes and engagement activity:

- [Bedfordshire Independent Custody Visiting \(ICV\) Scheme](#)
- [Bedfordshire ICV Bulletin](#) to inform the public of what the ICVs are doing.
- [Bedfordshire Stop and Search and Use of Force Scrutiny Panel](#)

- [Bedfordshire Stop and Search and Use of Force Scrutiny Panel bulletin](#) to inform the public of the Scrutiny Panel's work.
- [Bedfordshire Independent Custody Detention Panel](#)

Outcome: This enables members of the public to have a good understanding of activity which the PCC is undertaking and the various ways in which the PCC holds the Chief Constable account.

CASE STUDY: Cleveland

Theme: Accountability – Complaints

Objective/process: Cleveland OPCC use trends and themes identified from complaints to inform the PCC's overall scrutiny programme. They also use case studies to assist the force with improving processes and policies.

Cleveland is working with the Force around how they embed learning from complaints where they have been found to be 'not acceptable' to ensure that lessons learnt are captured and acted upon.

Outcome: The Complaints Resolution Team saw a rise in complaints from shop owners about the lack of police response to shoplifting. Responses were received from the Force by the OPCC in order to respond to complainants, and through this it came to light that there was a disconnect between force policy and what people were being told by force control room. This resulted in the force issuing clarification to all officers and staff regarding appropriate responses to shoplifting. The PCC held a retail summit and spoke to retailers about the issues they were facing, this led to the development of lines of questioning at a scrutiny meeting, the findings of which were fed back to the attendees of the summit.

A case study was used from a complaint received regarding stalking and harassment – in order to highlight a case where, in the Complaints Resolution Team's opinion, the victim received a poor service. They provided the force with an anonymised synopsis of the complaint to illustrate their questioning. As a result of this, the Force changed the way they log 'local factors' so they can better interrogate the data arising from complaints about stalking and harassment to ensure a more rounded picture.

CASE STUDY: South Wales

Theme: Accountability – Holding to Account and Scrutiny arrangements

Objective/process: In South Wales the Commissioner has adopted a risk-based approach to holding to account arising from the recognition that there are limited time and resources available to the Police and Crime Commissioner and his team to scrutinise South Wales Police in all the areas in which the Commissioner is required to hold the Chief Constable to account, and therefore focuses on the Chief Constable's statutory functions, his Delivery Plan and on those areas posing most significant risk to the delivery of the Commissioner's Police and Crime Plan ('the Plan').

National arrangements include the responsibility for the force to produce an annual Force Management Statement, which is required to include considerable factual detail and analysis. In South Wales, this is regarded by the Chief Constable and the Commissioner as a complementary document to both the Police and Crime Plan and the Chief Constable's Delivery Plan and has to be entirely consistent with them.

South Wales Police is held to account through a revised combination of meetings and activity by the Commissioner and the Commissioner's staff, as well as assurance panels and committees, internal and external audit, the public and stakeholders (in addition to HMICFRS and other external inspectors / scrutiny arrangements). The force also holds a performance meeting under the Deputy Chief Constable, with key performance indicators reported to the Commissioner's Strategic Board and to the Chief Constable's Gold meeting. The Commissioner may indicate key indicators on which regular reporting is required for a period or on a regular basis.

They have revised their governance structures which seek to further enhance the scrutiny and accountability work undertaken by the Commissioner and to provide greater clarity for the escalation and determination of any issues. The amended Manual of Governance is published on the Commissioner's website and the meeting structure is set out within the Annual Governance Statement.

At the centre of the Police and Crime Commissioner's arrangements is the Commissioner's regular Governance, Scrutiny and Accountability Board. This meeting occurs bi-monthly and is where most of the non-financial Commissioner's 'holding to account' arrangements come together. The Commissioner receives formal reports from the Chief Constable and others on a range of areas in which policing must be held to account. These areas are programmed in for the performance and financial year ahead.

The principal areas of focus where the Commissioner holds the Chief Constable to account are:

1. The performance of South Wales Police in the priority areas set by the Commissioner after consultation with others including local people.

This includes performance reporting on progress by South Wales Police (and partners) against the requirements in the Police and Crime Reduction Plan (and therefore the Chief Constable Delivery Plan). The Commissioner also looks for assurance from HMICFRS inspections and expects South Wales Police to address HMICFRS recommendations and other service improvements in accordance with agreed timescales. The Commissioner needs sufficient information to enable him to form a rounded view of the efficiency and effectiveness of South Wales Police. In addition to the Scrutiny Board reporting, officials from the Commissioner's office attend South Wales Police meetings that form part of their performance governance structure, e.g. the South Wales Police Confidence and Legitimacy Group (CALG), and other relevant boards as agreed.

2. South Wales Police arrangements for partnership working and collaboration.

South Wales Police increasingly works in partnership with other bodies – police forces, other public sector bodies, and organisations in the private, voluntary and community sector. Many of these partnerships are promoted by and supported by the Commissioner as part of his cooperation with the Chief Constable. The Commissioner will ask for assurances on how these relationships are being developed and managed, and their efficiency and effectiveness. The Commissioner is also party to formal governance arrangements over partnership and collaborative activity, where appropriate or necessary.

3. South Wales Police arrangements for engagement with local people.

The Commissioner must hold the Chief Constable to account for seeking and considering the views of the diverse communities of South Wales in shaping policing services. The Commissioner is also required to hold the Chief Constable to account for making available sufficient information within local communities about policing in their neighbourhood, and how residents can influence policing and discuss their needs for their local area.

4. The efficient and effective running of South Wales Police, including financial management arrangements and ensuring Value for Money.

At the bi-monthly meeting of his Strategic Board, the Commissioner receives reports on the Force's change programme, which is part of the Chief Constable's Delivery Plan, and drives improvements in South Wales Police efficiency and effectiveness.

The Commissioner also receives reports from the Resources Board (see below), on the overall financial position. Such reports enable the Commissioner to assess how the resources given to South Wales Police have been used, the extent of (and reasons for) any potential variation in the resources given, the degree to which they facilitate delivery of the Commissioner's Plan requirements and the Value for Money position of South Wales Police.

Assurance Panels

The Commissioner's 'Holding to account' arrangements, are supported by a variety of themed assurance panels and committees, but these panels and committees have no power to hold the Chief Constable to account.

It is made clear by the Commissioner who is expected to do what, through clear terms of reference and work programmes that are set or refreshed by the Commissioner with the Chief Constable and Chairs of the Assurance Panels at the start of each performance and financial year. HMICFRS has separate arrangements for setting a national programme of inspection activity each year.

As well as assurance activity programmed in at the start of the year, the assurance panels carry out assurance activity commissioned by the Commissioner (and / or the Chief Constable), or on issues highlighted nationally and by the public or partners locally. Assurance panels are also actively encouraged to identify other assurance activity that might be required through the year. Such recommendations for additional work are approved by the Commissioner (or Chief Constable) to ensure co-ordination of activity, and a focus on the areas in which the Commissioner needs support to his 'holding to account' arrangements.

An important part of the relationship and arrangements is the Commissioner and Chief Constable agreeing where the line is drawn between the operational independence of the Chief Constable and the duty on the Commissioner to hold the Chief Constable to account in the exercise of his functions. In discharging their overall responsibility, the Commissioner and Chief Constable are also responsible for putting in place proper arrangements for the governance of affairs and facilitating the exercise of their functions, which includes ensuring a sound system of internal control is maintained throughout the year and that arrangements are in place for the management of risk.

The Police and Crime Commissioner has established a Police Accountability and Legitimacy Group (PALG) consisting of external organisations and advisers. The panel members are invited to act as critical friends to South Wales Police. They will assist the Commissioner and Chief Constable in proactively promoting fair treatment and legitimate practices, and for this to be reflected within South Wales Police working practices and in dealings with the communities of South Wales. The panel members are invited to provide robust challenge and constructive support, working collaboratively to appropriately influence the legitimacy and fairness of the practices and policies of South Wales Police.

Outcome: Holding to Account and scrutiny arrangements have led to:

- Changes to the length of time images were retained as part of facial recognition deployment.
- Amendments to recording of stop and search data, when it was identified that incorrect dates of birth were being recorded.
- Greater partnership working where necessary to help in the development of prevention and early intervention.

The PALG have contributed to:

- Influencing the continued development of the South Wales Police Joint Equality Plan, including the inclusion of a whole workstream on neurodiversity.
- Highlighting areas of potential unconscious bias and successfully securing the force review and amendment of accurate ethnic representation in presentation materials for County Lines.

CASE STUDY: Humberside

Theme: Accountability – Holding to Account and Scrutiny Arrangements

Objective/process: Humberside PCC has an effective and efficient programme of Holding to Account and Scrutiny which has been developed and refined over a number of years. The core approach running through the programme is about getting the balance right between formal versus informal scrutiny and taking a challenge versus support approach.

Assurance arrangements are clearly outlined and understood by both the PCC, OPCC and Humberside Police and there are daily, weekly, monthly and bi-monthly

assurance mechanisms including through the Bi-Monthly Accountability Board, which ensures proper governance of the Force through open and constructive debate, focusing on the efficiency and effectiveness of the force. Humberside's Code of Corporate Governance underpins their holding to account and scrutiny activity and is used to drive business improvement. A review of their Independent Scrutiny arrangements, amongst other changes and improvements, has led to the implementation of an Ethics and Scrutiny Board with an Independent Chair. Humberside PCC has also implemented a local 'Our Approach to HMICFRS' protocol. This was originally produced for Engage, has been updated several times since, and covers their approach to inspections. This is agreed with the Chief Constable and has 4 stages to it – govern, plan, communicate and influence.

Outcome: The blend of formal versus informal has driven the biggest change – the timings within arrangements have ensured that they get routine contact from all parts of the senior team informally and the bi-monthly cycle of formal meetings brings everything together. Removing decision making from the Accountability Board was also an area which supported assurance and holding to account. It meant that important decisions were not being made in a formal meeting arranged to hold to account and that wider touch points were used to ensure informal consultation on decisions prior to the Commissioner being asked to sign anything.

CASE STUDY: Hertfordshire (Complaints)

Theme: Accountability – Complaints (Trust and Confidence)

Objective/process: Hertfordshire OPCC have developed an ongoing public survey for complainants. The objective is to improve and understand how the public feel the complaint handling process was handled and 5 key questions around timeliness, information, independence and impartiality are assessed. This is to gauge the public's experiences; all results are analysed, and an evaluation is undertaken on whether any improvements or streamlining to the process can be made to improve the service provided to the public. The feedback provided is publicised on the website to increase public awareness and for transparency reasons. The results help inform policies and processes where applicable.

Outcome: This has resulted in an improved understanding of the service delivered by the Complaint Resolution Team. This has also provided the opportunity to input the voice of the public to help shape changes in the Model 2 complaints processes or policies to improve any future experiences. Hertfordshire received some feedback which related to the complaints system being confusing to understand. Therefore,

they created a flow chart to map out the journey in a more simplified form, a remit chart detailing which department and organisation does what and an accompanying attachment which is sent out to all complainants at acknowledgement stage detailing next steps and the process. Feedback around promptness of acknowledgements, whether the complainant was advised what the process would entail and whether information was easy to understand is rated highly within the survey.

Theme: Accountability – Complaints

Objective/process: Hertfordshire OPCC collate extra data within complaint handling to maximise their understanding of complaints against the police and to identify changes and improvements. They collate data around whether the person is a victim, suspect or witness of a crime, the crime type the complaint refers to and use this to assist in identifying emerging themes. The Complaint Resolution Team (CRT) in the OPCC for Hertfordshire have a bespoke database to manage complaints and collate data to identify individual and organisational learning for continuous service improvement. Additionally, they use a complainant-victim mapping model to help to prevent future complaints. The information they collate enables them to produce detailed reports highlighting themes and trends around areas such as quality of service, individual behaviour, police powers and procedures by area and department.

Outcome: As a result of this information, CRT identified a training gap for student officers around victim personal statements. There was a lack of understanding around the need to provide a victim impact statement as part of every case and how significant this can be on a case at court. Due to this Officers now get more training on the Victims' Code of Practice.

Through this it was also recognised that CRT had received several complaints over several months relating to child abduction cases. This was flagged to the force within the bi-monthly Victims and Witness board. CRT had also identified a common theme within the timeliness of criminal investigations and the expiry of the statutory time limit to bring a charge for a summary offence. Several victims were coming forward stating their police investigation could no longer be pursued and their complaint was around a poor investigation, timeliness, lack of action and update and the fact they were unable to seek justice. The key identifier related to crimes that were initially recorded as an assault occasioning bodily harm (ABH) but were later re-categorised as common assaults due to the evidential threshold. As a result of this and after providing statistical evidence highlighting these themes and flagging to the force Victims and Witness Board changes were brought about for both matters. A case study was used from a complaint received regarding incorrect interpretation and

awareness around child abduction reports. CRT conducted a video interview with the complainant who discussed their experiences. This video was rolled out to use as a powerful training tool, demonstrating the impact of misinterpreting the National Crime Recording Standards and the effects this had on their particular case. Additionally, further guidance was sent around to teams on the correct handling and recording of child abduction cases. Sergeants and Inspectors are now monitoring and flagging investigations which have a statutory time limit and there is a new process to ensure these cases do not expire. CRT continue to collate this data and there have been no more complaints raised since, regarding child abduction cases. CRT have seen a decrease in valid complaints relating to assaults where a failing or learning has been identified. (Down from 40% of valid assault related complaints in Q4 2022 to 27% valid assault complaints in Q3 2023).

The OPCC has also identified other key themes and changes implemented because of issues arising during complaint handling. Their findings have been raised with the force and assisted in the following:

- Improved investigation standards
- Recommendations and changes for a more efficient process for property returns
- Issues affecting victim service were found and remedies introduced
- Highlighted training requirements for new recruits and common errors made
- CRT has provided input onto the supervisors’ course to highlight areas where supervision can be improved
- Improvements around progression/monitoring of investigations and greater awareness around crime allocation
- Emphasis on correct information and signposting to the public.

Appendix C: Data sources

Description	Sources	Cadence	Comments
Crime Data	Bulletins	Quarterly	Table P1 has police recorded crime by offence group and

Description	Sources	Cadence	Comments
	Police Force Area (PFA) Dataset	Usually released in January (for YE Sept), April (for YE December), July (for YE March) and October (for YE June)	<p>Police Force Area (PFA). Table P2 has percentage change from one year ago which can be used for trend analysis. Table P3 has rate per thousand which can be used for comparative analysis.</p> <p>Categories of crimes include violence against person, homicide, violence with injury/without injury, stalking and harassment, unlawful driving, sexual offences, robbery, theft offences, shoplifting, criminal damage and arson, drug offences, possession of weapons offences and public order offences.</p> <p>Table P5 has number of knife and sharp instrument offences recorded by the police, for selected offences, by PFA, and the percentage of these selected categories which can be used for comparative analysis. Table P6 has knife and sharp offences data from April 2010 onwards and can be used for trend analysis. Table P7 has offences involving knife or sharp instrument rate per 100,000 by PFA which can be</p>

Description	Sources	Cadence	Comments
			<p>used for comparative analysis.</p> <p>Table P8 shows the number of firearm offences by PFA from 2010 onwards and can be used for trend analysis.</p>
Police Recorded Crime and Outcomes	Open Data Table	Quarterly	Detailed statistics on police recorded crime by offence code broken down by PFA. Can be used for trend analysis and comparative analysis.
Criminal Justice	Criminal Justice Data Dashboard	Quarterly Usually released in May (for Q4), August for (for Q1), November (for Q2), February (for Q3)	The dataset has PFA level data for crime recorded to police decision, police referral to prosecution by the Crown Prosecution Service (CPS) and charge to case completion at court. This data is available for all PFAs over time and can be used for both trend analysis and comparative analysis.
Homicide	Bulletins Dataset	Yearly (ending in March) Usually released in February for the year before	<p>Due to the small number of homicides, analysis should be approached with caution.</p> <p>See table 24 for rate of homicide at the police force area level. Comparative analysis can be conducted here.</p>
Sexual Offences	Bulletins	Yearly (ending in March)	Table 10 shows the number of police recorded sexual

Description	Sources	Cadence	Comments
	Dataset	Usually released in March for the year before	<p>offences and percentage change between years by PFA, which can be used for trend analysis.</p> <p>Table 11 shows the rate of sexual offences recorded by the police, by PFA that can be used for comparative analysis.</p>
Domestic Abuse	Bulletins Dataset	<p>Yearly (ending in March)</p> <p>Usually released in November for the year before</p>	<p>Table 8 shows number of police recorded domestic abuse-related crimes and percentage of offences that were domestic abuse-related, by PFA from 2016 onwards. Table 9 shows the number of police recorded domestic abuse-related incidents from 2016 onwards. Table 10 shows the number of domestic abuse-related violence against the person offences recorded by the police and percentage of offences that were domestic abuse-related by PFA from 2016 onwards.</p> <p>This data can be used for trend analysis, and trends can be compared across MSGs. Proportion of offences can also be used for comparative analysis.</p>

Description	Sources	Cadence	Comments
			<p>Table 12 shows the rate of domestic abuse-related crimes recorded by the PFA. Since this data is adjusted by population it can be used for comparative analysis.</p> <p>Table 19 shows the number and proportion of domestic abuse-related stalking and harassment offences recorded by the PFA. Proportion of offences can be used for comparative analysis.</p> <p>Table 21 shows the number of offences currently recorded as homicide including whether domestic homicide and sex, by PFA. Data can be used to assess the proportion of homicides that are domestic, and the proportion of female victims. These proportions can be compared across MSGs.</p>
Fraud and Computer Misuse	Bulletin Dataset	Yearly (ending in March) Usually released in December	Table 5 has the number of fraud and computer misuse offences referred to the National Fraud Intelligence Bureau (NFIB) by Action

Description	Sources	Cadence	Comments
			Fraud, by PFA. Rate per population, and year over year change can be used for comparative analysis.
Drugs and Drug Treatment	National Drug Treatment Monitoring System ViewIt	Yearly	<p>ViewIt is publicly available and provides profile data on adults in treatment by substance group, age and sex. Data is presented across the treatment journey, including access to services, outcomes, client characteristics, and substances people are in treatment for.</p> <p>The Unmet Needs Toolkit, Local Outcomes Framework report, and Single Point of Contact Directory packs can also be accessed by OPCCs who have registered to NDTMS.Net and who meet the set criteria.</p> <p>For support on this, please contact Marcus.roberts@apccs.police.uk</p>
Homelessness and rough sleeping	Homelessness Dataset Rough Sleeping Dataset	Quarterly Yearly	Detailed local authority level data, where rates per population can be used for comparative analysis.

Description	Sources	Cadence	Comments
			Detailed local authority level tables with breakdown by gender, age, and nationality. Table 5 has rates per population from 2011 onwards and can be used for both trend analysis and comparative analysis.
Hate Crime	Bulletin Open Data	Yearly (ending in March) Usually released in October	Force level breakdown by motivating factor available from 2011/12 onwards. Trend analysis can be conducted. Data must be converted to rate per population for comparative analysis.
Youth Justice	Youth Justice Ethnic Disproportionality Tool	Yearly (ending in March)	This tool is accessible on knowledge hub. For access, please contact Richard.denham@apcc.police.uk Table 1.3b in the tool shows disproportionality by ethnicity and allows a breakdown to (Youth Offending Team) YOT area.
Workforce	Bulletin Dataset	Yearly (ending in March) Usually released in July	Workforce data can be sliced by gender and ethnicity and compared to the population. This can be used to check if the population is represented in the police force. Population information can be drawn from census data .

Description	Sources	Cadence	Comments
Use of Force	Bulletin Dataset	Yearly (ending in March) Usually released in December	<p>Table 14, 15, 16, and 17 show the PFA level data for the number of times tactics were used by age, gender, ethnicity, and health condition from 2020 onwards. This data can be turned into proportions to see if the concerned PFA is targeting a certain demographic group disproportionately.</p> <p>Table 13 shows Conducted Energy Device e.g. TASER incidents and use type by PFA from 2017 onwards. This can be used for trend analysis.</p>
Deaths During or Following Police Contact	Report and dataset	Yearly	<p>Though these statistics involve very low numbers, they should be monitored since they affect public confidence in policing.</p> <p>Statistics are broken down by PFA. Includes road traffic incidents, fatal shootings, deaths in or following police custody, apparent suicides following police custody, and other deaths following police contact. Data can be used for comparative analysis. Time series data is also available for trend analysis.</p>

Description	Sources	Cadence	Comments
			Caution should be maintained in analysis due to the low figures.
Police Complaints	National Report and Dataset Force level information bulletin	Yearly (usually published in October/November) Quarterly	Annual statistics are sliced by PFA and can be used for comparative analysis. Force level information bulletins contain comparative analysis and can easily be retrieved on a quarterly basis.
Police Misconduct	Bulletin Dataset	Yearly (ending in March) Usually released in January	Detailed statistics by PFA which can be converted into rate per police officers/staff and then used for comparative analysis.
Police powers and procedures	Stop and Search and Arrests Other Pace Powers	Yearly (ending in March)	Detailed statistics on custody detention and detention under Mental Health Act 1983 by PFA, stop and search and arrests by PFA. Analysis by age, ethnicity, sex and vulnerability can be done. Population adjusted statistics can be compared across police forces.
Other Police Data	Police Data Portal	Monthly	The website shows number of stop and searches by age, ethnicity, time of day and reason. It also shows 999 performance data by answer time.

Description	Sources	Cadence	Comments
			Both of these can be used for trend analysis and comparative analysis.
Digital Crime and Performance Pack (DCPP)	Digital Crime and Performance Pack - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services	Quarterly	The DCPP brings together already published data about police performance to improve transparency and accountability. The DCPP shows the performance of all 43 police forces in England and Wales against the priority measures outlined in the Government's Beating Crime Plan , in easy-to-use tables and graphical formats. It covers homicide, serious violence and neighbourhood crime.

Types of Analysis

Trend Analysis can be used to examine data over time, to identify patterns, tendencies, and changes within a dataset. By analysing historical data points, trend analysis helps in understanding the direction and magnitude of change in variables over a specific period. Caution should be used when looking at data from the Covid-19 pandemic years as these were outliers.

Comparative analysis can be used to compare police force data with other similar police forces to assess where they stand. [Most Similar Groups \(MSGs\)](#) can provide comparators for policing data. MSGs are groups of police force areas that have been found to be the most similar to each other based on an analysis of demographic, social and economic characteristics which relate to crime. They are designed to help make a fairer comparison between police forces than the England and Wales average can sometimes offer. Although caution should still be used in making black and white comparisons between forces, even in the same MSG. HMICFRS includes [information about MSG](#) on their website.

Analysis and Presentation

PCCs can regularly monitor performance by creating a dashboard for data visualization. This can be created either through [power BI](#), [Tableau](#), excel or any other suitable platform. Forces can also do ad hoc analysis when new data is released, or thematic analysis if there is a specific area of interest. For those who are relatively new to data analysis, a good place to start would be to create a [PivotTable](#) in excel which allows you to calculate, summarize, and analyse data that lets you see comparisons, patterns, and trends in your data.

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