

## **AVON AND SOMERSET POLICE AND CRIME PANEL**

### **COMMISSIONER'S UPDATE REPORT**

**8 DECEMBER 2020**

The following briefing provides an update for Panel Members on key activities since the last Panel meeting on 13 October 2020. This report reflects the position as at 26 November 2020.

Thank you to the Panel members who have responded in relation to the legitimacy question raised at the meeting in October, your responses have been very helpful and show that on the whole the public support the police approach to enforcement at this time. This is also reflected in the Police and Crime survey for Q2 which shows 58.7% fully support the approach taken by the police in relation to the covid restrictions, with 11.7% partially supporting and 23.2% believing police should be taking tougher action to ensure public compliance.

#### **Oversight of the Constabulary Response to COVID**

COVID 19 and related oversight, scrutiny, community engagement and reassurance and partnership work has remained a key focus of the PCC over the last few months. There have been a number of key issues, legislative and guidance changes and local partnership forums. In particular, the PCC and DPCC have continued to hold regular Facebook Live events with the Chief Constable to help explain the changes and to put local people's views to the police, carried out regular media interviews to explain the latest position, ensured that local people's views about the regulations, enforcement and particular issues are fed back to the Constabulary and attended high level internal and partner meetings including COVID 19 Local Engagement Boards.

The Constabulary conducted its annual staff survey, which included additional questions regarding Covid, the response rate from staff was larger than previous years, 62% compared to 46% the previous year

Other highlights include:

- Approximately 33% of staff continue to work from home
- Sickness remains lower than previous years across the organisation (2.52% compared to 3.91% last year)
- During the pandemic the Constabulary have continued to deliver training to 5354 students across all disciplines
- 65% stated they would like to see an increase home working giving better concentration, increased productivity and welfare benefits as reasons why
- Increase in screen time , workload and ensuring you took regular breaks were highlighted as having a negative impact
- 90.2 % stated that they had easy access to their line manager

#### **Crime Demand Context**

During October, crime demand fell below the seasonably expected level and a steady downward trajectory in demand has been recorded throughout the last 6 – 8 weeks. 15,806 incident logs were created in October. This is 4% lower than the same period in 2019. Similarly, 10,711 crimes were recorded in October, representing a 9.7% reduction on the same period last year.

Following the imposition of the 2nd national lockdown on 5th November 2020, a further reduction in both calls for service and crime have been experienced. For the 2 week period ending on 16th November, the following differences in the 'seasonally expected averages' (based upon the same period in 2019 and 2018) were observed:

- Overall crime decreased by 18.2% (Commercial Burglary decreased by 45.7%; Theft Shop decreased by 44.1%; Serious VAP decreased by 20%; Hate crime increased by 4.8%; Cyber-crime increased by 68.8%)
- Overall calls for service decreased 2.2% (999 calls decreased by 11.1%; 101 calls increased by 2.9%)

#### **DEMAND SUMMARY OF KEY POINTS:**

1. Demand has reduced below the seasonably expected level, largely due to the imposition of the 2nd national lockdown. However, it has not fallen to the extent that it did in March / April (during the 1st national lockdown), largely due to the less stringent measures in force.
2. Demand is unlikely now to drop any further. Following the proposed relaxation of conditions on 2nd December, demand is likely to increase again. Indeed, due to the proximity in time to the Christmas party season, a short-term increase in night-time economy activity and associated ASB / violence against the person may be experienced in December.

#### **COVID19 Fines and enforcement (as of 20 November)**

There have been a total of 490 FPNs issued for breach of Covid regulations. The breakdown by LA area is:

Somerset - 177

Bristol - 162

South Glos - 82

North Som - 31

BaNES - 9

Awaiting location - 29

During the current lockdown legislation has changed that means that protest no longer has an exemption to allow people to gather, this has meant that policing these type of events has had to adapt and this was demonstrated at the recent "Stand Up Bristol" event where 13 people were arrested. The Constabulary has also responded to a significant Rave in Yate where the level of violence used against officers by those attending was very high, again a number of people were fined and some arrested and an investigation continues to identify those that attended and organised the event.

Operation Hydrogen is the response to the funding provided by the Government to tackle Enforcement of Covid legislation. The Constabulary were awarded £687,000 and have planned how this money will be spent between now and the end of March 2021. It includes high visibility enforcement 7 days a week, along with engagement with local authorities and marshals, campaigns through corporate communications, additional fleet and cycles, additional intelligence and analysis support and an Inspector to oversee the work.

Operation Hawthorn is the Constabulary response to unlicensed music events and Raves and consists of a command team and one Police Support Unit, Inspector, 3 Police Sergeants and 18 Police Constable's) working across the organisation on Friday and Saturday nights and if required coming together to respond to an event such as the Yate rave. This ran from July until the end of Sept and then on Halloween and planned for New Year. They have disrupted over 20 events and dealt with those that have arisen for example Bath and Yate.

## **Local Resilience Forum**

Local authorities have put in place Local Outbreak Plans and Local Engagement Boards which are all attended by the PCC or DPCC.

## **UK Terrorism Threat Level raised to Severe – 4 November 2020**

The Joint Terrorism Analysis Centre (JTAC) raises the UK terrorism threat level from substantial to severe – meaning that an attack is highly likely. JTAC's decision to change the threat level has been driven by a number of factors, including the recent attacks in France and Vienna. JTAC's assessments are made independently of Ministers and are based on the latest intelligence. The threat level is kept under constant review.

## **Governance and Scrutiny**

- **Shoplifting** - the PCC is not aware of any changes to the Constabulary's financial threshold for police attendance which the ASC Business Crime lead has confirmed is £50 currently. ASC are reviewing this having had a steer from Government and Police leads. ASC are, in addition, starting the process of reviewing the Business Crime Strategy and will have a workshop at the next Business Crime Forum meeting in the New Year. The PCC's office lead is the Interim CEO and he is now attending the APCC's Business and Retail Crime Portfolio meetings alongside the DPCC.

## **ASC Annual People Survey 2020 Results**

ASC report the response rate to this year's survey at **62%**, with **3774** forms completed. Last year's survey attracted a response rate of **46%** and **2574** responses. This shows an increase of 18% and 1200 responses. The response rates for all of the directorates have increased.

See attached Infographic from the Constabulary with more detail. (Annex 1)

## **Deputy Police and Crime Commissioner Update**

The PCC specifically recruited a Deputy to support her and the team on community engagement activity and this has continued to be a priority for the DPCC in the last few months including virtual visits to Bridgwater, North Somerset, Southmead and Bath – a focus of these visits has been reducing reoffending and violence reduction which the DPCC continues to lead on for the PCC. The DPCC has also continued to deputise for the PCC at key meetings and events when she has been unable to attend including covering annual leave during this period which included meeting with local authority leaders, attending Covid Engagement Boards and Strategic meetings and also carrying out Facebook Live and other engagement events. The DPCC leads for the South West Regional Reducing Reoffending Board on the Prisoners Building Modular Homes project and recently presented to the Cabinet Office One Public Estate Team on an application for funding for that project. More details are set out below on the areas the DPCC leads on for the PCC of Engagement, Violence Reduction work and Reducing Reoffending.

## **Engagement**

The OPCC Engagement Strategy takes a three pronged approach to increase focus on and improve the way we do our stakeholder and community engagement across Avon and Somerset. This involves:

### **1. Community and policy based direct engagement:**

Activity since our last update includes visits by the PCC to Ropewalk House in St Jude's Bristol and St Paul's in Bristol. These visits were arranged following direct contacts from residents and community

groups in the respective areas who had expressed concerns about specific policing and partner agency issues including drug related crime and anti-social behaviour. We invited partners to these problem solving meetings including police, local authority housing officers and the local MP.

The PCC also visited some of the local support services who were recipients of the recent Ministry of Justice emergency funding, to learn how the services using the money to support victims during the pandemic. Services visited include:

- Opoka (South Glos) - supporting Polish women and children escaping domestic abuse.
- Kinergy (South Glos) - support services for survivors of sexual abuse and violence
- SARSAS (Taunton) – a commissioned partners offering services to victims of Rape and Sexual assault
- Mankind (Taunton) support for men suffering domestic abuse

Each visit is debriefed with the team and action points and areas of concern from local residents which are then followed up with the relevant OPCC department or partner agency. A series of further events across the force area are now being planned up until the end of the calendar year.

## **2. Continuous engagement and communications activity to mitigate our strategic risks.**

The OPCC Strategic Risk Register contains two strategic risk areas that fall under Engagement. They are strategic risks four and five –addressing how **to engage with the public and other stakeholders** and how to increase **public confidence in or awareness of the OPCC**. Here is a summary of our recent key mitigating activity:

- **Post Covid19 lockdown survey**

During the month of September, the OPCC ran an online survey that encouraged local people to share views on how the police have responded to restrictions and what services they feel need extra support. We hosted this on our website and sent out through various channels including a press release to media, organic posts on our social media, paid social media adverts, paid adverts in local and hyperlocal media including radio, direct emails stakeholder groups e.g. Rural Crime Forum.

Nearly 2,000 local people shared their views on how the coronavirus pandemic has impacted how safe they feel in their community. We used tracked links for every different channel that the survey was shared on, in order to see which channels were most successful in yielding responses. We are using the analysis to improve our delivery next time.

The results highlighted that, due to the impact of the pandemic, 69% of respondents have concerns about safety and crime in their community or local area. Respondents also raised concerns about police visibility in their communities with 46% agreeing that police should be more visible. The survey also asked questions on people's views of Operation Uplift and where they would like police officer resources deployed. The survey responses have been used by the Communications and Engagement team to inform some of our messaging and highlight in our communications what services, additional funding and action is ongoing that addresses some of their concerns. The relevant feedback is also being shared with the Constabulary.

- **Precept consultation with public**

Our current method of delivery of precept consultation is done by telephone survey.

Because of the extraordinary circumstances presented by the pandemic, and the adverse impact on people's employment and financial stability, we want to increase the volume of our consultation responses and ensure we get a better representative spread of responses across households in varying socio-economic situations.

To do this we are delivering the precept survey online and selecting a sample of A&S addresses from across all deciles within the Indices of Multiple Deprivation (IoMD) to send a pre-paid self-addressed paper version of our survey. We regularly analyse the demographics of the

responses we get via the telephone survey. During these unusual and difficult times legitimacy is key and we want to focus on testing additional consultation tactics to help us learn how we can improve our representation through consultation delivery.

### **Violence Reduction Unit's (VRU)**

#### **Overview of funding for 20/21 delivery (end of grant date 31/03/21);**

| LA           | Total              |
|--------------|--------------------|
| Banes        | £ 114,884          |
| Bristol      | £ 424,389          |
| N.Somerset   | £ 143,582          |
| Somerset     | £ 362,225          |
| S. Gos       | £ 114,920          |
| <b>Total</b> | <b>£ 1,160,000</b> |

#### Funding update:

We still have no indication as to whether there will be continued VRU funding for 21/22, however through various channels of communication with our Home Office colleagues we believe they have been lobbying for multi-year funding, which would create more opportunities for planning ahead and sustainable approaches to delivery. We will continue to work with the local VRU's to plan around the possible eventualities for 2021/22. The Deputy PCC has written to the Home Office to flag the importance of early notification of funding, this was responded to positively by the Head of the Serious Violence Department within the Home Office, albeit with no promise, recognition to this and our work locally was made.

#### Strategic 'Hub' activity:

Centrally the OPCC will be coordinating an 'Annual Report' for mid-January, telling the story of our model and achievements thus far, a series of workshops have been set up with the VRU's to bring this report together. The Home Office have suggested this document will potentially be used to influence decisions. As well as this, a procurement process is near to complete, to appoint a local independent evaluation provider. 7 Bids came through with some really relevant and exciting experience to bring to the review. We will be looking to review both the 'hub and spoke model' and also a selection of community based interventions (such as community mentors and community safe space's). Another significant area of work will be both the local and strategic refresh of the needs assessments and response strategies, these will be delivered by the VRU spokes and centrally by the OPCC for the Avon and Somerset overarching reports. These must be submitted to the Home Office in March.

County Lines continues to take a focus, we have seen some great linked up work between VRU, Surge (Constabulary) activity and other key partners in delivering targeted activity in Somerset. Efforts are being made to achieve similar partnerships in N. Somerset.

Health Data (particularly A&E) sharing is happening but quality remains of a mixed standard reducing the ability to be able to use it effectively. Deputy PCC John Smith is continuing to drive this agenda and has recently met with RUH to engage them with this process. The OPCC and Constabulary are also part of a South West NHSE group, also working on data sharing process to tackle serious violence.

As part of the update on data, one of the key highlights to flag is the roll out of the VRU Qlik App, which is now being proactively used in all 5 areas. The app provides a form of 'social network analysis' using police data to enable informed and targeted approaches to tackle serious violence, this works

to an individual level, group or hotspot area. This has only been achievable through the joint up working with the Constabulary. The OPCC will be co-hosting a 'webinar' with the Constabulary to showcase this tool, this has been offered out on a national level to both VRU and non-VRU areas, Surge SPOCS, as well as the Home Office and APCC. We are seeing a high level of interest in this learning event to be held on 03/12/20.

Education, although a protective factor for many, it can also bring with it risks in terms of young people engaging with serious violence. There remains an inconsistent offer across the A&S area to the most vulnerable cohort of young people who are at highest risk of exclusion, this is mainly down to a variation on local authority 'inclusion' processes. The Strategic VRU maintains driving this as a priority area to ensure consistent approaches and resource are allocated to working with the Education sector, as part of this an 'Education Protocol' has been designed for the Strategic VRU to agree to a set of working principles for the VRU's to commit to. As well as this, the Constabulary have developed a 'School's Strategy' which clearly outlines their offer and resource available to schools, as to which the VRU's is part of.

The OPCC is going to be recruiting an Analyst Role on a one year fixed term contract to predominantly focus on VRU work but also support in other areas such as Reducing Reoffending. Performance and Analysis work has been a gap in the central coordination function of the VRU work and will benefit hugely in our ability to understand impact. This appointment is likely to be no earlier than late February.

The Strategic VRU Board meets quarterly, now chaired by the Deputy PCC. The last Board was held on 12/10/20, which focused on local spoke updates as well as working through the key priority areas (as outlined in above updates). The next Board is to be held 09/02/21, local Councillors have been invited to attend on this occasion.

The partners forming the Board, include;

- OPCC (inc. Deputy PCC, Communications, Serious Violence and VRU leads, Strategic Planning and Performance Officer)
- North Somerset VRU
- Bristol VRU
- Somerset VRU
- B&NES VRU
- S.Glos VRU
- Head of Neighbourhoods and Partnerships (ASC)
- ACC Cullen (Serious Violence lead)
- Supt Raphael (Surge lead)
- VRU Inspector
- Chief Insp Paterson (SOC lead)
- ASC Youth and Schools Lead
- Head of Performance and Insight (ASC)
- Somerset Association of Secondary Head teachers
- Public Health England (SW lead)
- National Probation Service
- BNSSG (CCG) (Head of Transformation)
- NHSE Improvement (Assistant Director of Quality and Safeguarding)
- Executive Principle of the Bristol Woodway Federation

*NB: the Board is still evolving and seeking to include additional relevant partners. Representation for the Voluntary Sector is a priority.*

#### Local frontline 'spoke' delivery:

Frontline delivery within the spokes is still happening, however it cannot be denied that with the late notification for 20/21 funding and of course Covid, the ability to deliver has been slowed down and certainly reduced the ability to report on impact. With the second lockdown posing some challenges, everyone feels they have learnt a lot from the first wave and so positive momentum can be observed this time; Outreach work continues to be successful where it can be delivered, with some recent fruitful results in areas of Bristol. Engagement with schools continues to be a concern but an agreed focus of the VRU's to support and drive attendance where they can. The VRU PCSO's have been playing an important role in this. Case Studies can be viewed in Annex 2 for Bristol and North Somerset which reflects on some of this work.

As updated previously, the roll out of the VRU App has significantly aided the functionality of the VRU's. Each spoke area has a regular meeting structure to use the App, in conjunction with their local partners input and information sharing. These meetings provide a robust process to identify and manage their cohorts.

Additional funding was sourced from the Home Office to support 'micro-charities' aligned to the work of the VRU's during Covid. £98,101 was received for the area in July and funded until 31/10/20. Under this additional funding, 1178 young people were supported.

#### Performance:

The Home Office have set the following Key Performance Indicators, which form part of the quarterly reporting and also use of *Public Health* held data;

1. an update of progress made against the Delivery Proposal and completion of specified activities;
2. involvement of partner organisations;
3. progress in delivering the Purpose, including a multi-agency, public health approach to preventing and tackling serious violence; delivery of the mandatory products and the Core Function;
4. The number and nature of interventions funded and the number of young people supported by means of specified interventions.
5. *a reduction in hospital admissions for assaults with a knife or sharp object and especially among those victims aged under 25;*
6. *a reduction in knife-enabled serious violence and especially among those victims aged under 25;*
7. *a reduction in all non-domestic homicides and especially among those victims aged under 25 involving knives.*

We have developed a locally held performance template, which requests a number of other additional metrics that illustrate activity, demographics and measures attributed to commissioned interventions. It must be noted that this is working progress and that as previously suggested, meaningful reporting this financial year has been disrupted by Covid, we anticipate that Q3 will see a positive shift. Completion of this reporting requires both local authority input and Police data, this will be an early task for the Analyst to embed and quality assure.

Headline figures on the collective reach of VRU's for September 19-August 20 can be seen in Annex 3. We will continue to develop our opportunities for impact review, although this year has been somewhat hindered, we are confident that in maintaining VRU momentum and learning from the numerous elements of review pieces that are due to take place, we will have a good picture of what serious violence looks like in Avon and Somerset (moving on from the initial BIT report), as well as a good understanding of our VRU impact by the end of the financial year.

## **Reducing Reoffending**

Since the last Panel meeting the Drive project – being piloted in South Gloucestershire – has gone out to tender, with a closing date for bids of 4<sup>th</sup> December. Drive is a Domestic Abuse perpetrator scheme which has previously been trialled in South Wales and reported significant results. Following the receipt of bids an evaluation process will take place in the usual way. Another key project of the Resolve Board – Court Up, which will support and work with women as they attend Bristol Magistrates Court – has also recently gone out to tender with a closing date of 21<sup>st</sup> December. The Programme Manager for the Ready for Release programme in Bristol prison is due to start in post on 1st December.

The combined investment over the life of the project of the three commissioning partners is *up to* £755,207. (NCLF/DRIVE contribution, OPCC and SGlos). OPCC have committed to investing up to **£243,000** from Resolve reserves. South Glos have committed to investing up to £210,000.

The review of Integrated Offender Management (IOM), commissioned by the Resolve Board and undertaken by RSM has reported. A sub-group of the Resolve Board reviewed the report in detail and it was also considered by the wider Resolve Board at its last meeting. The report sets out a range of options for taking IOM forward. It was agreed that further meetings at a local authority level will take place to consider these options.

A new Senior Commissioning and Policy Officer in the OPCC – Kirsty Stokes – has been appointed and will have a focus on reducing reoffending as part of her role. Kirsty is due to take up post on 1<sup>st</sup> December.

## **Lammy Review**

The Avon and Somerset Lammy review work continues and is on schedule to produce a final report next year. Workshops with key stakeholders are being held in the next few weeks on each of the 6 work streams. The Independent Chair met with David Lammy in September and has been invited to participate in a national network to show case the Avon and Somerset work. The Independent Chair is happy to attend the Police and Crime Panel to update members on the work in the New Year.

## **PCC Election**

The Election Governance Board continues to meeting monthly which is proving to provide very good oversight and planning. At the last Board held on 29/10/20 the PARO's representative attended and was able to provide a tentative timeline for the pre-election/election period. These dates need to be confirmed by the Electoral Commission but provide some early insight for planning purposes;

22<sup>nd</sup> March 2021- notice of election (Purdah commences)

23<sup>rd</sup> March 2021 – nominations of candidacy can be accepted

8<sup>th</sup> April 2021 – deadline for nominations

6<sup>th</sup> May 2021 – Election

7<sup>th</sup> May 2021 – Election result

At current there are two self-declared candidates, who have both been in touch with the OPCC to seek opportunities with regard to meeting with the Chief Executive (OPCC), Chief Finance Officer (OPCC) as well as the Head of Commissioning and Partnerships (OPCC). The 'normal' offer of ride-alongs, custody



visits and a communications centre visit have been paused whilst the pandemic is still rife. This will be reviewed and the opportunity will be reinstated when assessed safe to do so.

## **HMICFRS**

Since last reported there have been no new responses or publications requiring a response.

However the Constabulary was subject of two thematic inspections in October. The first was about the policing of protests and the second was a joint inspection of the Constabulary and CPS into the investigation and prosecution of rape cases. These reports are not expected until the new year.

## **Police and Crime Board**

Agendas and minutes of the Police and Crime Board are published at the following link:  
<https://www.avonandsomerset-pcc.gov.uk/reports-publications/police-crime-board-reports/>

## **Key Decisions**

There has been one formal decision since the October Panel meeting.

- Agreed replacement of CCTV Live Feeds Infrastructure

All decision notices and accompanying documents are published at the following link:  
<https://www.avonandsomerset-pcc.gov.uk/reports-publications/decisions-log/>

## **Commissioner's Community Action Fund (CCAF) with recovery fund focus:**

**CCAF** –Snapshot of Q1 and Q2 provided below and will provide end of year report.

### **Total value for LA (CCAF only)**

|                |         |
|----------------|---------|
| Bristol        | £50,300 |
| Banes          | £11,500 |
| North Somerset | £10,982 |
| Somerset       | 14,700  |
| South Glos     | £0      |
| Forcewide      | £35,000 |

## **Ministry of Justice Extraordinary Covid Funding – Round 2 –**

The Ministry of Justice (MOJ) has made further COVID-19 Extraordinary funding available for organisations that support victims of domestic abuse and sexual violence and is again distributing this funding via PCCs. £216,000 has been provided to Avon and Somerset to cover the period November 2020 to the end of March 2021 (Members will recall that round one of the extraordinary funding covered the period April 2020 to end of October 2021). This is significantly below both the amount received in round one and also the amount providers set out they needed for this period (following a needs assessment process conducting on request of the MOJ towards the end of September). As such the Commissioning Team are currently working through the allocation of this funding and we will update PCP next report once all is confirmed. We are working with providers from the original round.

As with round one the MOJ have imposed very tight timescales for OPCCs and providers to respond to this process.

## **Criminal Justice**

I continue to chair fortnightly meetings of the Local Criminal Justice Board. Despite the hard work of individuals across all criminal justice agencies progress has been slow in addressing the backlog of cases due to Covid. Adaptations to court buildings and the current installation of screens across courts where social distancing is not possible have allowed an increased volume of cases to be heard, with 5 trial courts due to be running in Bristol by the end of the month. This will also aid the ability to run complex and multi hander cases for up to six defendants. Bristol Law society has been introduced as a nightingale court but support for criminal cases continues to be delayed. Technology is still not being used to transform the system.

Both the Lighthouse Safeguarding Unit and a number of external victim services I commission are under severe pressure given few cases are going through the court process (and therefore need continuing support) and an increase of new cases continue to be referred in to our services. Services also report that the complexity of cases and victim vulnerability is more significant, presenting another challenge.

I continue to highlight the challenges, risks and issues facing the criminal justice system through my national role and continue to advocate for more radical approaches to ensure justice is delivered in a timely manner.

## **Independent Residents' Panel**

The Independent Residents' Panel (IRP) scrutinise completed cases of complaints made by members of the public against Avon and Somerset Police. The panel is chaired and run by volunteers and they meet on a quarterly basis. The last meeting was the 24<sup>th</sup> September 2020. This session was held virtually as a result of lockdown measures. Using digital solutions the Panel were able to scrutinise and review complaints relating to 'most recently closed' public complaints. This enabled the Panel to look at a broad range of complaints with varied themes such as Discriminatory Behaviour or Delivery of Duties or Service

They reviewed approximately 26 complaints in total. The report for this meeting is due to be published in over the coming weeks.

The next meeting is scheduled for the 3<sup>rd</sup> December 2020 and will focus on Abuse of Police Powers. It will also have a continuous professional development input for the Panel as Counter Corruption will be providing an input as well as the Independent Office for Police Conduct.

The panel's findings are shared with Professional Standards for comment and published as a public report.

The Panel's reports are published on the PCC's website at:

<https://www.avonandsomerset-pcc.gov.uk/reports-publications/independent-residents-panel-reports/>

## **Reviews of complaints**

The new complaints legislation went live on the 1<sup>st</sup> February 2020 and this increased the role of the PCC in that the PCC became the appropriate appeal body for the management of low level service complaints against the Constabulary. These appeals are known as Reviews.

To date the PCC has received a total of 94 reviews. 65 (69%) were not upheld and 11 (12%) were considered invalid. 18 (19%) were upheld. The number of reviews received is the highest in the region, being slightly above the number received by D&C, but the proportion upheld is comparable with others in the region (through comparison at regional forums).

In the majority of cases, the PCC was satisfied that the complaint had been handled 'reasonably and proportionately'.

### **Scrutiny of the Use of Police Powers Panel**

During the last 2 weeks of November 2020 Panel members are reviewing (remotely) cases within the theme of disproportionality in Stop and Search and Taser deployment, selecting body worn video (BWV) footage of black ethnicity subjects in the Bristol East area and Somerset area. An additional 4<sup>th</sup> review of Covid-19 regulation cases is part of the Panel reviews, as well as the request to review BWV relating to complaints from members of the public regarding Stop and Search and Taser.

Collated member feedback will result in a Report, highlighting cases to view again by all members at the Panel meeting (remote) on 10<sup>th</sup> November 2020. The invited guest at this meeting is from Dorset OPCC. Panel reports are published on the PCC's website at:

<https://www.avonandsomerset-pcc.gov.uk/reports-publications/scrutiny-police-powers-panel-reports/>

### **Independent Custody Visiting Scheme**

Independent Custody Visitors (ICVs) returned to onsite visits of the 3 Custody Units in October 2020, also with some continuing remote visits (phone calls to detainees and Custody Record reviews), the latter remaining as the contingency plan due to Covid-19.

During July to September (Quarter 2), the total number of detained people (DPs) through custody was 4814 (Q2 2019 was 4844). At the time of the 43 ICV visits in Q2 there were a total of 370 detainees in custody and ICVs visited 94 detained persons (DPs) - checking each person's Rights, Entitlements and welfare – plus reviews of 126 Custody Records (CRs).

ICVs are reporting positive findings including internally: ICVs commending Custody Staff for professionalism, being friendly and interested; Magazines and Exercise Yard provision for DPs; Clothing provision for DPs; Toothpaste/brush, cotton towels for showing rather than paper towels; and a good range of Meals and Drinks including hot chocolate and decaffeinated coffee. Externally: Enhanced cleaning; Mental Health Assessment onsite (Somerset Trust), HCPs and G4S running well. ICV findings of concern include: Increased detention time (average 2-3 hrs.) and staffing requirements for virtual remand courts (VRCs). The Constabulary has now withdrawn from VRCs.

ICVs welcome the updated Custody Covid-19 Guidance and look forward to reviewing CRs to check records of any DP's informed consent to remote legal advice and to virtual Interviews.

### **Strategic Policing Requirement (SPR)**

The purpose of the SPR is to highlight key national threats where police forces (Chief Constables and PCCs) need to contribute using local and /or regional capabilities to the national response, either individually or collaboratively, in order to protect the public. The current review is considering national threats, the required policing response, and, separately, options for strengthening accountability and improving governance.

The first part of this review included a survey for PCCs and Constabularies to respond to. In response to this the Association of PCCs (APCC) established a working group and organised a meeting for all PCCs to discuss the collective response. The outcome of this meeting was almost unanimous in agreeing that very little change was required. There was a concern any expansion of content or governance through the SPR could be detrimental to the local leadership and delivery at a force level, especially for PCCs.

Following this meeting I submitted a response to the Home Office, the APCC and the Association of Policing and Crime Chief Executives. In essence my response agreed there were no fundamental changes needed but I did suggest the addition of cyber crime and fraud as national threats and that county lines and exploitation of children should be recognised as a specific themes under the Serious and Organised Crime threat.

**Standing Updates:**

**Contacts/Complaints Oversight**

The OPCC Contacts Team receive a weekly average of 296 contacts (email and telephone calls) internally and externally per week. These contacts vary from members of the public seeking to invite the PCC to events, enquiries about funding and more complex matters such as complaints or community issues. Of this correspondence a proportion (approx. 50 – 17%) result in a case being created in the OPCC case management system and case work being required.

| Month     | 2020 | 2019 | -/+ |
|-----------|------|------|-----|
| September | 226  | 221  | +5  |
| October   | 149  | 236  | -87 |

The OPCC average handling time for this period reduced to 2.9 days from 4.5 days despite a KPI of 20 working days. The theme of contacts has broadened again due to the significant reduction in COVID19 queries and the Black Lives Matter correspondence. We also saw 28 contacts relating to ideas or innovations and 26 relating to road safety. We received 29 complaints (various in nature and appropriate authorities), 5 compliments and the majority of the correspondence received related to operational matters at 151.

Data also includes monitoring of complaints which is a statutory function for the PCC. Since Sept 2019 (when records started), the PCC has monitored 164 complaints at the request of the public to ensure transparency, fairness and compliance with statutory guidance. The team continue to check complaints handling regularly to support timely resolution and compliance with the IOPC Statutory Guidance 2020.

**Scrutiny of ASC in relation to TVP review and alleged banking fraud:** Report attached (Annex 4)

**Estates:** An update report is attached. (Annex 5)

**Contact Officer** – Mark Simmonds, Interim Chief Executive

# Avon and Somerset Police

## PEOPLE SURVEY 2020 RESULTS



Due to the global coronavirus pandemic that has changed the way we've been working, this year's People Survey, carried out in October, follows on from two wellbeing 'Pulse' surveys that were carried out in May and July.

The annual People Survey is now in its third year and allows us to seek the views of all those who work for us in order for us to learn what we do well and where we can do better.

The survey allows us to measure the engagement of our workforce as well as views across seven main themes.

This year we're delighted to see an improvement across all seven themes, as well as increased engagement in relation to the continued implementation of our four values that are being weaved into ways of working across the organisation.

Of course the survey also highlights where we can do better, and there are still clearly areas we can improve. However it is great to see that as an organisation we're moving in a positive direction again this year.

We use a range of tools to measure and understand how this last year has felt for you all and this will allow us to measure any trends to see if we've improved on the ideas and suggestions you made last year.

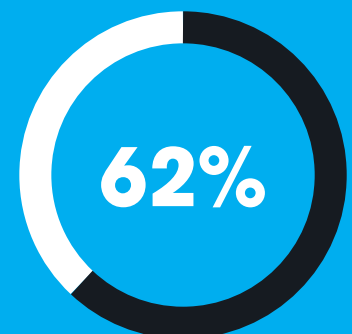
We have also added seven 'future ways of working' questions to understand how you have worked throughout this time. The results of these questions are being analysed to take forward and inform our future working plans for the organisation.

Based on your feedback, we can strengthen work already in place and decide on new actions we can take together as a caring, courageous, inclusive and learning culture, to move our organisation forward over this coming year.

Given everything that has happened this year, we thank you for taking the time to make your voice heard and feed in to the future work of the organisation.

## RESPONSE RATE

Overall **3,774** of you responded to this year's survey which is a response rate of 62%. Last year we had 2,574 responses, which was 46%. This is a massive 16% increase on the last two years' responses and an increase of 8% on the two wellbeing Pulse surveys we ran (54% in May and 54% in July).



# KEY FINDINGS



## EMPLOYEE ENGAGEMENT

Our employee engagement index was 58% last year and **this year it has increased to 68.5%**, which is higher than Ministry of Defence (63%), Ministry of Justice (59%) and the Civil Service benchmark (61%). **Engagement remains strongest among our youngest and shortest serving staff.**

## INCLUSION, WELLBEING AND FAIR TREATMENT

In 2019, 63% of the people who responded agreed that overall they are happy at work. 67% think the organisation respected individual differences. **This year, 75% agree that overall they are happy at work and 79% think the organisation respects individual difference.** This is a significant change from last year and a great move forward for our Inclusive value.



## BULLYING AND HARASSMENT



In 2018, 11% of those who responded said they had personally experienced bullying and harassment at work in the past 12 months. This remained the same in 2019 with no significant change, comparable to national benchmarks. On the back of feedback this year we have separated bullying and harassment into two different questions. **This year 6.8% of respondents said they had been bullied and 1.5% said they had been harassed over the last 12 months.** Further analysis will be done and fed into work to improve this within our organisation.

## UNDERSTANDING DATA

One of the new questions we asked last year was if employees felt they had confidence in understanding and using data. 64% of the organisation told us that they did in 2019. **This year 73% agreed they had confidence.** This supports our aim to be data-driven.



## LEADERSHIP, MANAGING CHANGE AND IMPROVEMENT



This was the lowest scoring theme across the last two years and for this year it remains the lowest score. The lowest agreement for both years was for the question on how well change is managed, **this year the lowest agreement is for the question on having the opportunity to contribute my views when decisions are made.**

# WE MOST AGREE

“I am trusted to carry out my job effectively”



“I understand how my work contributes to the constabulary objectives”



“I am treated with respect by the people I work with”



“My manager is considerate of my life outside of work”

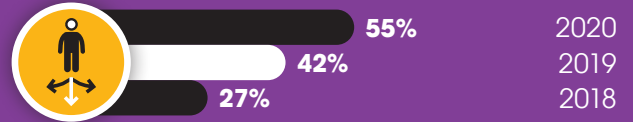


“I have a clear understanding of the constabulary objectives”

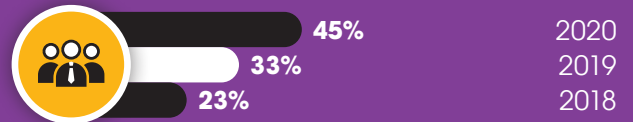


# WE LEAST AGREE

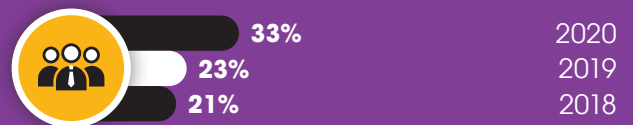
“There are opportunities for me to develop my career in the constabulary”



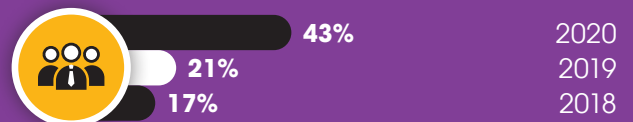
“Senior leadership teams in the constabulary are sufficiently visible”



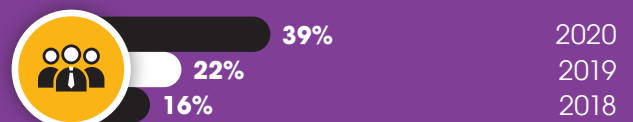
“I have the opportunity to contribute my views before decisions are made that affect me”



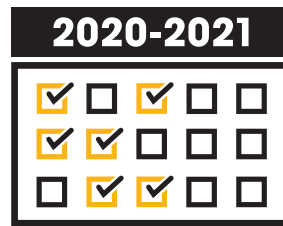
“I feel that change is managed well in the constabulary”



“When changes are made in the constabulary they are usually for the better”



# TURNING RESULTS INTO ACTION



## Actions from last year

All of the directorates fed back prior to this year's survey, outlining an array of workforce improvements that have been made in the last 18 months. These included:

- equipment upgrades
- introduction of PCSO supervisors
- creation of Demand Flow Project
- CPD on what teams and leaders want to further their learning
- web chats and drop in sessions with senior leaders on different topics
- increased visibility of senior leaders
- reward and recognition within teams
- direct Q&A sessions and more consultation with teams on decisions and feeding back the rationales behind them.

On the back of focus groups and in collaboration with the Disabled Police Association and our organisation lead for autism, we have implemented a Wellbeing Passport.

The passport can be used by anyone at any time and has had particular positive feedback from both users and line managers

## Turning this year's results into action

As we move into the new year, we will start to consider what action we can take on both a local and whole organisation level. Organisational Development along with the Improvement Consultants and HR Business Partners will be working with senior leadership to discuss resources that can help.

## Things you can look at first

- clear identification of specific issues in your areas
- areas that are working well and how this could be replicated in other areas or across the whole organisation
- actions to address specific issues raised, wherever possible, weaving these into pre-existing ways of working so that the change can be embedded - for example, continuous improvement plans, IPR reviews, appropriate meeting/team agendas, wellbeing conversations and future ways of working.

## NEXT STEPS



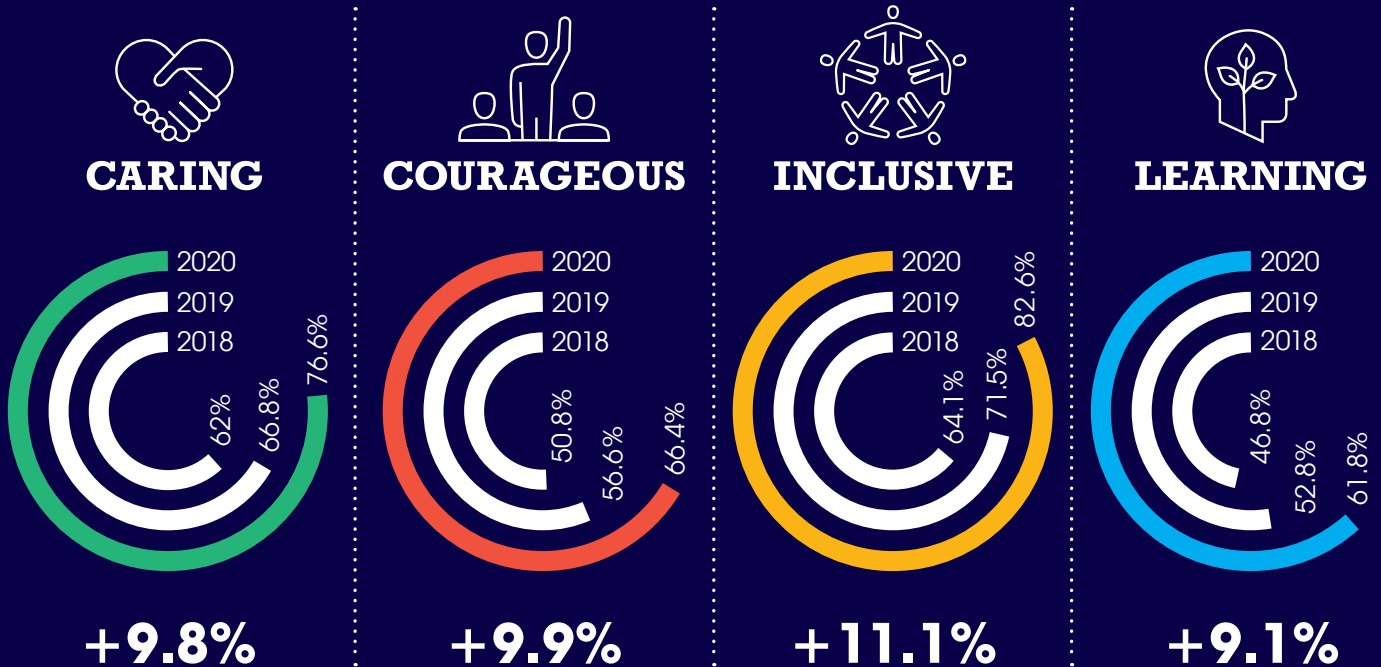
During November we are sharing the results of the survey with teams across the organisation. This is your opportunity to look at the results and consider what they might mean for your teams, where there appears to be good practice and where there are potential areas for improvement.

These results will build on the great work that has happened over the 18 months since the last annual survey, within all directorates and across the organisation.

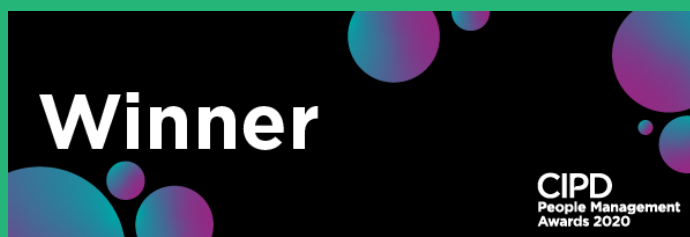


# VALUES

We can now see a three-year trend of how our values have felt to you.



The highest agreement and the biggest improvement year on year since 2018 is our Inclusive value with an 11.1% increase on last year.



## PEOPLE MANAGEMENT AWARD

We are proud to announce that in September our People Survey Analytics App won the CIPD award for the Best Digital/Technology Initiative in the HR/L&D category. The judges commented,

*"Avon and Somerset Police's submission is our winner because it's clear they're delivering on their strategic goal of driving a diverse and inclusive workforce through their innovative and effective combination of data, leadership and clarity of purpose."*

## **Bristol Case Study**

### **Identification/ Background**

16 year old male PB, identified as a young person at risk of CCE through our Qlik app due to hitting 4 risk indicators - reported missing on 3 different occasions, non-school attendance, arrested for carrying a bladed article and PWITS. He has links to other young people involved in CCE and county lines. No current or previous involvement from Social care or Families in Focus.

PB was discussed at a safer options meeting and we gathered other intelligence and analysed PB's current risk. As we Tier our young people 1,2,3 – 1 -being High concerns – 2 – being Medium concerns 3 – being Low concerns, we set PB at Tier 2. (bearing in mind any young people that we Tier at 1 would need to have lead professional working with them and their families. Lead Professionals can be a Social Worker, Strengthening Families Worker from Families In Focus or a YOT Practitioner.

Actions taken by VRU based on PB's Tier 2 status at the time;

Education Inclusion Manager – establish current education offer to assess why he is not attending and how we re engage PB back into education.

The VRU PCSO and Police Intelligence Officer made a home visit to explore his missing episodes and offer support/ intervention opportunities.

### **Intervention**

PB was referred to a Community Organisation where he was matched to one of their Community Mentors (CM), who is well known in the community and has lived experience.

The CM started to build a relationship with PB and PB said he felt he could relate to the mentor and they quickly built a rapport. The Mentor and PB would meet 3 times a week during this time they explored together the issues for PB and the Mentor was able to find out more about what was going on for PB.

It was quickly established that PB was in drug debt to some older males (names he wouldn't disclose) and he was being made to deal drugs to repay his debt. Having this intelligence, although the names of the groomers were not disclosed by PB, Police Intelligence Officers and Safer Options team were able to build a picture around PB from his associations and the Police were able to establish a bit more around who PB might be in debt to from past intelligence and work with other young people.

As PB had also disclosed that he was carrying a knife for protection, the Community Organisation and Mentor engaged PB into a series of targeted group work sessions with him and his friends around choices and consequences of carrying a weapon. Again this work helps the Safer Options Team gain more understanding of why young people are carrying knives and how we can support them not to.

Because PB was clearly being groomed a NRM was applied for him and this was accepted therefore no charges came about. This was instrumental to us gaining trust with PB and his family – who were really worried that him having a criminal record.

Support was offered to parents via a parents group that Safer Options fund within the local community which supports parents to explore CCE and CSE issues, with regular speakers and training around these issues along with support around children going missing and/or non-attendance – again Safer Options fund a community organisation to run this group in order or parents to access local provision in an environment that is comfortable for them.

### **Outcomes**

With the support PB enrolled in a construction course at college with good attendance and has made some new friends on his course.

He also has a part time job working in a warehouse 3 evenings a week.

He continues to attend the weekly group's session.

He meets with his mentor not so often now as the mentor is part of the group work staff team.

He openly says that he no longer carries a knife and can talk to other young people about why they shouldn't carry a knife

He has not been involved in any criminal activity for the last 3 months.

He has recently (throughout)been part of an online music production group whereby tutorials were run on line for young people who are interested in music – equipment provided by Bristol City Council in order for young people to join the group.

The organisation delivering the on line workshops have reported back the PB is clearly using his music sessions to explore and develop and he is becoming much more self-aware along with being very supportive of other young people who are in the situation he found himself in six months ago.

# North Somerset Violence Reduction Unit Intensive Engagement

The Intensive Engagement Programme is an approach being trialled in two areas of Weston Town Centre, which if successful will be rolled out wider across North Somerset. Using internationally recognised approaches, staff from the VRU, local agencies and the community will be working together to build stronger and more involved communities that work closely together to both raise understanding of issues and develop solutions and services to the local community.

Intensive Engagement is a structured and consistently repeatable process of community engagement and involvement activities aimed at improving co-production of community health, safety and resilience; shaping partners' strategies and resources and preventing, delaying and resolving problems. It is based on locally identified solutions and practices using an 8 step toolkit.

The two LSOAs identified, WsM Central - Alfred Street and WsM West - Upper Church Road, are within the area where two thirds of violent crime and disorder have been recorded in North Somerset.

The VRU are coordinating this under the 'Communities Programme' within the VRU, with a focus on building community resilience to the issues that underpin violent crime. The VRU Sgt is leading the approach with staff and community from across the area assisting to deliver sustainable improvements to the areas defined.

The approach is building on existing approaches such as Redeeming Our Communities, ensuring that it complements and meets the needs of local residents. The first 4 stages of the LISP process also ensures a complete understanding of local insights and the formulation of locally based solutions in partnership with agencies.

## Benefits:

- Early intervention
- Addresses local priorities and concerns
- Increased community intelligence and rich picture insight

## Challenges

- Shared vision and expectations
- Clarifying purpose, evaluation and impact measurement process
- Communicating strategy to ensure project is motivated and enables rapid progress



# VRU REACH A BRIEF SUMMARY...



## YOUNG PEOPLE IDENTIFIED...

Across Avon and Somerset over **800** Young People (YP) have been identified as at risk through the VRU's

## ACTION TAKEN...

The VRU's worked with partners and took some form of action where it was deemed appropriate with nearly **600** of these YP



## WHAT SORT OF ACTION?



This might include; gathering more information or intelligence, working to support a leading partner such as the school or social worker. It might involve mentoring on a 1:1 basis or referring to another intervention.

## WE HAVE ALSO SUPPORTED FAMILIES...

The VRU's alongside their partners, have also delivered targeted support to **90 families**. This targeted work continues to develop to reach more families.



## WORKING WITH EDUCATION

Working with education has been important, both to implement upstream early intervention but to also ensure those YP at risk are well supported by their school...

Across the force area the VRU's have in some way worked with just over **200** schools and over **4,800 students**. This includes student workshops, staff training, individual mentoring and general awareness raising.





## PCC Summary Statement

Response to correspondence received by the Police and Crime Panel in relation to fraud within Lloyds Bank and other banking institutions in October 2020.

26<sup>th</sup> November 2020

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### Purpose

The PCC has been subject to a number of complaints regarding perceived failure in her statutory responsibilities to scrutinise and challenge the actions of Avon & Somerset Police in their handling of multiple allegations of fraud against Lloyds Bank and other financial institutions. These matters have been heavily scrutinised both internally and externally and in August 2019, the Police and Crime Panel concluded that the PCC had actively sought assurances where required and had not failed in her statutory responsibilities (*notwithstanding that recommendations were made for further consideration*). Thames Valley Police also led a peer review which concluded in September 2019 which found no concerns or issues with the actions or decision making by Avon and Somerset Police in these cases.

Both outcomes received heavy criticism from the complainants and allegations of corruption and collusion have continued to be levelled at Avon and Somerset Police and the PCC.

It is important for the purposes of this summary to reiterate that under the Policing Protocol Order 2011:-

- The Commissioner has the legal power and duty to monitor all complaints made against officers and staff, whilst having responsibility for complaints against the Chief Constable.

However the legislation is clear that:

- The Commissioner must not fetter the operational independence of the Police Force or the Chief Constable who leads it.
- The direction and control of a Chief Constable will include total discretion to investigate or require an investigation into crimes and individuals as he/she sees fit.

The aspiration of both reviews and subsequent findings was to provide the complainants with independent assurance that due diligence had been applied and confirm that the decision making was transparent, fair and lawful. Regrettably, the lack of mutually agreeable outcome has caused further dissatisfaction and fuelled speculation.

The Police and Crime Panel received new correspondence from representatives and affiliates of the Action4Justice/Lloyds Victims Group in October 2020. The material alleged that information was

withheld from Thames Valley Police, that the PCC has blocked this investigation and that the complainants were promised a full investigation.

**Additional allegations of corruption have been made against the PCC. These allegations are subject to formal complaint procedures via the Independent Office for Police Conduct and will not be commented on in this report.**

It is recognised and agreed by both the Police and Crime Panel and the Office of the Police & Crime Commissioner that the PCC:

1. Did not commission the TVP review.
2. The PCC has no power to block or fetter operational policing, nor instruct an investigation where the Chief Constable is satisfied it does require one.
3. The PCC has never promised 'a full investigation' as it is not in her power to provide one. The Police have been clear that this was always considered a 'review'.

The decision not to investigate these complaints remains an operational policing decision and outside the role of the PCC and the Police and Crime Panel.

This report seeks to assure the Panel of the PCC's scrutiny of the Thames Valley Police Review including missing material and activity relating to banking fraud contacts. It will also highlight the investment and growth of the Economic Crime Team within Avon and Somerset and the strategic work undertaken by the PCC/OPCC at a national level in response to fraud.

## **1. Scrutiny**

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### **Thames Valley Review**

The Thames Valley Police Review (TVPR) was commissioned directly by the Chief Constable in response to continued allegations of corruption against ASC staff, the Chief Constable and the PCC as well as ensuring public confidence and transparency.

Whilst it is recognised that this was an operational review, the PCC and her team were permitted full access to the review including sight of the Terms of Reference (TOR) on the 26<sup>th</sup> February 2019. The PCC was pleased to see that of the 10 cases subject to the review, it included all those she had brought to the attention of the Constabulary. The TOR also included identifying any links to Op Hornet (HBOS Reading) due to continued intimation that there were links between the ASC cases and those investigated by Thames Valley. It also clearly stated that UKFF/UK Acorn Group cases were out of scope due to SFO/NCA reviews in 2018 and previous joint scrutiny action by ASP, PCC and P&CP.

The review was formally commissioned April 2019 and the final report was received 5<sup>th</sup> September 2019. The final Gold Group was held on 10<sup>th</sup> December 2019. During this period the PCC directed the CEO and Head of Contact and Conduct to act under her delegated authority and exercise this scrutiny function under her direction which included:

- Holding an A&S OPCC and ASC Joint Review into the cases relating to Lloyds Recoveries and other banking institutions on Friday 12<sup>th</sup> April 2019 chaired by the PCC and attended by the Chief Constable.
- OPCC CEO and Head of Contacts and Conduct attended **all** related Gold Group meetings (4 in total) in order to scrutinise the progress and findings of the TVPR including the September 2019 meeting where the lead officer for the TVPR, Detective Superintendent Nick John came

to present their findings. Both were given the opportunity to question the methodology and findings of the TVP team. The PCC was briefed after every Gold Group.

- There were 21 meetings in this period between the Head of Contacts and Conduct and PCC/CEO where updates were provided and they discussed matters relating to TVPR and banking fraud.
- There were 5 informal meetings between the Head of Contacts and Conduct and Avon and Somerset Police Gold Group Sub-Committee representatives to check progress with the TVPR and address new material/contact received by the PCC.
- The OPCC were given early sight of the TVPR outcome and opportunity to comment on the findings.

Each complainant was spoken to personally by a member of the TVP team to confirm the findings in relation to their case and a follow up letter was sent by ASC to conclude the matter. Whilst the complainants remained dissatisfied with the outcome, the PCC and her team were assured throughout that the TVPR had been conducted fairly, transparently and in accordance to the TOR. No links were identified between these cases and those in the Operation Hornet cases.

During the review a list of 200 names were provided to Thames Valley as potential victims of banking fraud. Of these 200, 13 were identifiable and related to ASC. 6 were UKFF/Acorn Finance which had previously reviewed and were out of scope. 7 related to ASC and were reviewed as part of the TVPR with 5 being ASC reported and handled cases and 3 were ASC residents.

On the 19<sup>th</sup> October 2020 the OPCC received notification from the Panel that they had received additional correspondence relating to the TVPR and Lloyds BSU. All of the material was reviewed and shared with Avon and Somerset Police. A Gold Group was held on the 12<sup>th</sup> November 2020 to review the material and enable the OPCC to scrutinise the actions of ASP on behalf of the PCC.

The OPCC were satisfied in all the cases that they had been followed up and responses are being provided where appropriate.

Where expressions of dissatisfaction were identified, they have been passed to Professional Standards in accordance with The Police (Complaints and Misconduct) Regulations 2020. They have since been concluded and no further action is being taken notwithstanding any right to review.

Allegations also emerged that material was omitted by ASP and this was compounded by a letter from TVP PCC Anthony Stansfeld sent to a complainant on the 5<sup>th</sup> October 2020. It intimated that ASC had not shared information with TVP on one case that 'strongly indicated a major fraud had been committed' against the complainant. This letter is misleading and factually inaccurate. This material has been scrutinised heavily by the PCC as it was the only outstanding action from the TVPR. This material was **never** provided to ASP and TVPR were clear that they did not believe it was evidence of criminal matters but it did identify irregularities that required follow up. ASP have sought to resolve this issue many times however due to the global pandemic the complainant has not been in a position to meet with ASP to date. ASP are taking all possible steps to expedite this.

The other issue of missing material was subject to formal complaint procedures with Avon and Somerset Police which have now concluded. The OPCC have been able to question ASP leads about this material and based on the explanations provided are satisfied that there has been no deliberate attempt to omit material. The material has now been brought to the attention of TVPR lead Detective Superintendent John who has liaised with the complainant accordingly. Avon and



Somerset Police provided full access to Guardian, Niche and Altia (the primary crime recording systems) as part of the Review.

The OPCC representatives asked all the ASP staff present at the Gold Group including Chief Officers whether there any reason to suspect that information was deliberately omitted from the TVPR. All present answered no.

The PCC was briefed in full of the Gold Group outcome 13<sup>th</sup> November 2020.

### **General Scrutiny Activity**

The OPCC/PCC continues to provide scrutiny on matters relating banking fraud. The PCC has received 80 contacts relating to wider banking fraud including Lloyds since the Summary Statement sent to the Panel on 9<sup>th</sup> May 2019. Many of these are cc'd emails that are not related to Avon and Somerset or directed personally to the PCC. Every contact is thoroughly reviewed to ensure that any new information, new report, request for assistance or question posed to the PCC is managed. Replies are provided where appropriate such as operational questions, clarifying ASC/PCC position or where steer is required such as signposting to alternative agencies or support services e.g. Action Fraud. In some cases they have required referral to ASC for an operational view, safeguarding, liaison with other forces and to check and test decision making.

Banking fraud matters have been discussed 12 times between the Head of Contacts and Conduct and the PCC/CEO since Jan 2020. The Head of Contacts and Conduct has held 3 meetings with Fraud Team (previously Economic Crime Team) in this period to address correspondence issues including addressing and responding to all correspondence to the P&CP from the 11<sup>th</sup> March 2020 meeting.

The PCC and her team continues to impartially scrutinise the actions of ASC in relation to fraud on a case by case basis and is always cognisant of new reports or information.

### **Strategic work relating to Fraud**

The PCC is fully aware of the challenges in investigating and prosecuting reports of fraud on a national level. In May 2019, the PCC wrote to the then Home Secretary in response to the HMICFRS – FRAUD A TIME TO CHOOSE publication issued on the 2nd April 2019 which highlighted concerns about Action Fraud's capacity and the handling of fraud cases nationally. The PCC echoed these concerns but was able to provide assurance that Avon and Somerset did not have any such 'sifting out policy' and every report was triaged according to threat harm and risk as well as the call for service criteria for fraud. The PCC also iterated Avon and Somerset's adoption of Operation Signature which provided prevention and protection services for vulnerable victims of fraud. The PCC reaffirmed her commitment to tackling fraud as indicated through the refreshed Police and Crime Plan (2019-21) and that fraud should be regarded as a local priority in addition to knife crime, burglary, drugs, anti-social behaviour and road safety.

The PCC also attended the APCC Fraud Deep Dive 21 May 2019 in London hosted by Commander Karen Baxter, National Economic Crime Co-Ordinator, City of London Police which focused on the strategic approach to fraud. The Head of Contacts and Conduct represented the PCC recently at the APCC Fraud Symposium 19 October 2020 and discussed the report commissioned by West Midlands OPCC on Tackling Fraud in the UK – Successes, Shortfalls and Strategies for Improvement. The PCC has also been approached by UK Finance, the collective voice for the banking and finance industry, representing more than 250 firms across the industry to explore how the OPCC, ASP and UK Finance can work together to prevent fraud and protect our communities. This meeting is scheduled for the 14<sup>th</sup> December 2020.

The PCC has also been in contact with Kevin Hollinrake MP, Chair of the All Party Parliamentary Group on Fair Business Banking during this period. Most recently she wrote to Mr Hollinrake in January 2020 to seek an update on the proposed recourse platform for SME's. Mr Hollinrake confirmed that the 'Business Banking Resolution Service' (BBRS) was in the pilot phase and a selection of cases had been identified for the pilot. It had been the intention of the OPCC to follow this up later in the year however this was not possible due to COVID-19. Recent information in the public domain would suggest that the complainants have raised concern about the BBRS therefore deemed it not fit for purpose. The PCC/OPCC continues to work with national initiatives to improve services and support to victims of fraud at both a local and national level.

## **2. Resourcing of the Fraud Team (Complex and Volume) previously known as the Economic Crime Team**

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There has been previous intimation that the reason Avon and Somerset Police have not investigated these cases is due to the associated costs. The PCC is satisfied that this has not been a deciding factor in these cases and the matter of costs has never arisen as part of the decision making.

There is no minimum value below which the Fraud Team will not investigate. There are factors that may mean the Fraud Team would not investigate but they would only take into account value when considering the most appropriate and proportionate response for a report of fraud.

All fraud (except call for service) is initially assessed by NFIB. As part of their assessment they apply various algorithms which means that some cases will not be reviewed. However, a minimum value isn't one of those factors that would automatically rule out a case for investigation notwithstanding that a higher value case may evoke review.

There is an acceptable level of capacity to deal with fraud within Avon and Somerset. Fraud reports are assessed by a supervisor in the Fraud Team and the Fraud Investigation Model is applied. This is then directed to the most appropriate unit for investigation. This could be through the Incident Assessment Unit for desktop investigations, Response for incidents requiring attendance, Investigations or retained by the Complex or Volume Fraud Team.

The Fraud Team has been subject of growth in accordance with the demand placed on the Constabulary through fraud cases. The recent investment in 7 new posts has been directly funded through the 2020/2021 precept increase. This includes investigators, a supervisor and two new Protect Officers who will work directly with our most vulnerable communities and the wider public to educate, protect against and prevent fraud. Whilst Protect Officers will educate, prevent and protect against fraud they will also investigate. Avon & Somerset Police are the only Fraud Team in the region that have the Protect Officer resource. This will be complimented by the new National Economic Crime Victim Care Unit which means that everyone who is a victim of fraud will now have access to an appropriate level of support.

## **3. Recommendations from the PCC Complaint.**

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| Recommendation  | OPCC Action  |
|---|--|
| Changes in the Complaint Regulations: The Panel requests a further report on the Commissioner's | <ul style="list-style-type: none"> <li>• OPCC Head of Contacts and Conduct and CEO met with Democratic Specialist and</li> </ul> |

|  |   |
|--|---|
| <p>preparation for these changes. This should include recruitment of staff, training and resource implications. The Panel would be grateful if the details of the process the OPCC will adopt for keeping the Panel informed of numbers/themes of Police complaint appeals including Super Complaints, could also be included.</p> | <p>Panel Sub-Committee lead to provide an overview.</p> <ul style="list-style-type: none"> <li>• Appointment of Review Manager</li> <li>• Meeting between CEO, Democratic Specialist, OPCC Head of Contacts and Conduct and Review Manager to discuss complaint handling.</li> <li>• Revised Complaints Protocol submitted and awaiting Sub-Committee sign off.</li> <li>• Agreement and implementation of PCC Complaint Panel Summary Report including risk rating.</li> <li>• Head of Contacts and Conduct &amp; Review Manager attended IOPC and Sancus Training on new regulations.</li> <li>• Complaints and Reviews regularly featured in Commissioner’s Update including Super Complaints.</li> <li>• OPCC Head of Contacts and Conduct and Review Manager attend Regional OPCC Review Meetings with IOPC.</li> <li>• OPCC Head of Contacts and Conduct and Review Manager presented to the Panel October 2020.</li> </ul> |
| <p>Independent Residents Panel and Joint Audit Committee - The Panel hopes that there is a formal mechanism relating to these bodies that enables complaint findings to be directly presented to the Commissioner.</p>   | <p>IRP – All the material including the findings of the panel in relation is presented to the PCC as part of the report produced by the IRP which is published here:<br/> <a href="https://www.avonandsomerset-pcc.gov.uk/reports-publications/independent-residents-panel-reports/">https://www.avonandsomerset-pcc.gov.uk/reports-publications/independent-residents-panel-reports/</a></p> <p>JAC – The PCC attends the JAC and therefore hears their findings first hand. The reports are circulated and published here:<br/> <a href="https://www.avonandsomerset-pcc.gov.uk/reports-publications/joint-audit-committee-reports/">https://www.avonandsomerset-pcc.gov.uk/reports-publications/joint-audit-committee-reports/</a></p>   |
| <p>IOPC - There should be a system to ensure the Commissioner is personally made aware when the Independent Office for Police Complaints makes recommendations to the Constabulary</p>   | <p>The PCC is updated at every SLT weekly meeting by the Deputy Chief Constable of cases referred to the IOPC. Where the IOPC manage or direct complaints the Head of Contact and Conduct will be made aware and attend any associated Gold Group. There is also quarterly meetings between the Head of Contact and Conduct and the Head of PSD to discuss any IOPC matters. The PCC is updated accordingly.</p>  |
| <p>We recommend that if future complaints require the Commissioner to exercise her oversight duty</p>  | <p>This recommendation is accepted.</p>   |

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| or challenge function of the Chief Constable, then a very detailed record is kept of any meetings or conversations that take place.   |   |
| We recommend that a formal process for the storage of record books is adopted because the continuing value they bring is immeasurable when accountability is challenged. We regard these records as being the property of the Office of the Police and Crime Commissioner and they should be retained by the office on change of Commissioner and a retention period applied to the books. This recommendation serves the joint purpose of protecting both the public and the Commissioner. | The Information Commissioners Office has recently completed an audit of OPCC's and made a number of recommendations. This is being captured as part of this work in the new year and in preparation for the PCC Election. |
| The Panel has been advised that the Commissioner and her PCC colleagues are in talks to bring about a constructive banking review and related compensation scheme and the Panel welcomes this collaborative step. The Panel recommends that the Commissioner notifies the complainants.   | Please see commentary above under Strategic work related to fraud, specifically the Business Banking Resolution Service.  |

## Final Summary

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An extensive level of scrutiny and assessment has been applied by multiple agencies in these matters and none have found concern or issue with the actions of Avon and Somerset. There is no supporting evidence to suggest that there has been any corruption or collusion with an intention to deceive complainants. The PCC must rely on the information provided to her by the Chief Constable however the PCC has discharged her scrutiny at multiple levels of Avon and Somerset Police through her team throughout this period. All have been advised that the matters reported did not contain the elements required to make out a criminal offence and have been satisfied with the explanations received.

The PCC and her team have always maintained their sympathies for those affected by these banking matters. Whilst the PCC continues to discharge her scrutiny function to ensure the highest level of transparency and public accountability in policing, the PCC has now exhausted all appropriate scrutiny options at this time. It is regrettable that there is now a level of acceptance that neither the PCC nor Avon and Somerset Police are likely to alter the beliefs, change perceptions or provide assurance to complainants in these matters. Whilst sympathetic to the circumstances the complainants are in, there is nothing further that the PCC can do to assure herself that these matters have been taken seriously and fairly.

Avon and Somerset Police deal with an average of 180 victims of fraud a week in the Avon and Somerset area and have had many successful outcomes. An example of this is Operation Everest, a three-year investigation into a complex £7million investment fraud involving 340 victims, many who were elderly and vulnerable. The offender in this case was a green energy fraudster who claimed to

be raising funds for a biogas reactor. The victims, some of whom were suffering from dementia, suffered losses ranging from £5000-£500,000. An original investigation had already been started by another police force but was discontinued. Avon and Somerset Police picked up and continued the investigation and after a ten-week trial, the leading defendant in the trial was sentenced to seven and a half years and ordered to pay compensation of £1.94million. The lead officer was recognised nationally for her work and received the 'Outstanding Investigator' award in the 2019 Tackling Economic Crime Awards as well receiving praise from the presiding judge.

Fraud remains a concern nationally and the PCC and her team will continue to work with Avon and Somerset Police and key stakeholders nationally to disrupt and deter offending and protect the public.

**Avon and Somerset Police and Crime Panel  
Estates Summary – November 2020**

| <b>Site</b>   | <b>Status</b>  | <b>Timescale</b>  |
|---|--|---|
| Shepton Mallet  | New premises opened  | March 2020  |
| Williton  | Lease in place for new police station at West Somerset House<br>Works to complete<br><br>Proposed disposal of old police station                         | Winter 2020/21<br><br>20/21   |
| Taunton   | Completion of sale - old police station  | September 2020  |
| Kenneth Steel House, Bristol                          | Phased refurbishment programme   | Work completed Autumn 2020  |
| Yeovil  | Design phase for new police station on existing site expected to complete<br>Construction programme due to commence                                      | Winter 2020/21<br>Spring 2021   |
| Minehead  | Options re-appraisal continues following decision that leasehold premises identified on the high street no longer viable due to flooding risk            | Autumn 2020, Winter 2020/21   |
| Trinity Road, Bristol                                 | Contracts exchanged with preferred bidder<br>Planning application finalisation and submission<br>Proposed re-development to commence                     | September 2020<br><br>No later than Jan 2021<br>2021/22 (subject to planning) |
| Broadbury Road, Bristol                               | Options appraisal continues to include potential sharing with partners/partial disposal.   | 2020/21   |
| Wells   | Construction commenced on new police station<br>Project expected to complete<br>Completion of sale of old police station                                 | Autumn 2020<br>Winter 2020/21<br>2020/21                                      |
| Street  | Refurbishment complete<br>Proposed disposal of surplus building  | 2020/21   |
| Somerton  | Options appraisal. Refurbishment costs/business case to be informed by condition survey  | 2020/21   |
| Chard   | Options appraisal continues for new police station.<br>Proposed disposal subject to business case  | 2021/22<br>2022/23  |
| Burnham   | Options appraisal continues  | 2021/22   |
| Bath (Lewis House)                                    | Agreement of Terms in principle.<br>Design development and sign-off with BaNES.<br>Original scheme design no longer achievable<br>Options review ongoing | Spring 20/21<br><br>Autumn 2020   |
| Weston Super Mare (Town Hall – Police Enquiry Office) | Terms agreed.<br>Construction to commence (subject to signing of lease).   | Autumn 2020/21  |