



## Norfolk's Police and Crime Commissioner (PCC) response to inspections published by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)

Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond and publish comments on all inspection reports pertaining to your force within 56 days of report publication.

### Inspection Title:

The policing response to antisocial behaviour: PEEL spotlight report

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### Police Forces:

All local forces in England and Wales

### Link to Report:

[The policing response to antisocial behaviour: PEEL spotlight report - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services \(justiceinspectorates.gov.uk\)](https://justiceinspectorates.gov.uk)

### Section 55 Response Deadline:

5 December 2024

### Key Findings

This HMICFRS report brings together findings from their police effectiveness, efficiency and legitimacy (PEEL) programme, force management statements and a request for promising practice from the College of Policing to all forces in England and Wales. This report focuses on the police response to antisocial behaviour in England and Wales. In doing so, the Inspectorate drew on evidence from a range of sources, including academic research, national guidance and findings from:

- HMICFRS' police effectiveness, efficiency and legitimacy (PEEL) programme, which assesses the performance of police forces in England and Wales (comprising all PEEL inspections between 2021 and February 2024, and including evidence from the period affected by the pandemic)

- force management statements (self-assessments that chief constables and their London equivalents prepare and give to the Inspectorate each year)
- a request for promising practice to all forces by the College of Policing
- publicly available data.

HMICFRS found that most forces need to improve how they identify and record antisocial behaviour. This was particularly true when antisocial behaviour included or was connected to criminal behaviour. Correctly identifying antisocial behaviour and subsequently recording the correct crimes is important to make sure victims receive the service they expect and deserve. Call handlers using technical scripts appropriately can be very effective in achieving this.

The report suggests that forces need to improve how they identify and protect vulnerable people. This helps inform an appropriate response from the very first point of contact and reduces harm. HMICFRS were encouraged to see most forces have a clear and well-understood definition of vulnerability. The Inspectorate found that in some forces there was uncertainty about processes for identifying and recording antisocial behaviour and allocating resources, and about who had responsibility for work related to antisocial behaviour. While HMICFRS found that most forces carried out an initial risk assessment at first point of contact, they didn't always carry out effective antisocial behaviour risk assessments when things changed and when the incident was concluded.

The Inspectorate found that some forces make good use of technology to encourage antisocial behaviour reporting. Some forces have made changes to their online reporting websites, to make them more user-friendly for people reporting issues such as antisocial behaviour. Some have invested in online reporting and advice portals that allow call handlers to deal with antisocial behaviour and nuisance calls using text chat. There were also examples of innovative practice such as QR codes and apps to help the public report persistent antisocial behaviour.

In many instances too many forces do not understand the prevalence of antisocial behaviour. Some forces made good use of data to tackle antisocial behaviour. Better-performing forces clearly identified those people who made many calls for help about antisocial behaviour and the locations where antisocial behaviour took place. It was found that too many forces didn't understand the level of antisocial behaviour in their force area. Forces were poor at collecting, analysing and using data. They had difficulty obtaining data from partner organisations and there was also limited analytical support to help frontline teams understand local problems.

There was a lack of analytical support which undermines efforts to tackle antisocial behaviour effectively. Many forces now have central teams to manage complex antisocial behaviour data, which helps to update and assign work to local neighbourhood teams. These central teams provide expert and technical guidance. Other forces have simple data analysis tools that give clear, accurate data to allow better decisions on priorities and activities. Poorer-performing forces often had poor-quality data and inadequate IT systems,

and lacked expertise dedicated to antisocial behaviour data analysis. They often didn't give their officers and staff the tools and training they needed.

HMICFRS found that most forces are good at sharing antisocial behaviour data with partner organisations. There were many good examples of information-sharing between forces and other organisations, including sharing problem-solving plans and data. Approaches to sharing data included IT systems that multiple organisations can access, and using technologies such as Microsoft Teams so that updating and discussing cases across and between organisations is easier.

Some forces need to address IT issues that prevent them using data effectively. Forces need fit-for-purpose IT systems so that they can use data or share information with external organisations to tackle antisocial behaviour. Forces must address issues of IT incompatibility and access, and make sure that IT solutions are fit for purpose; both for the police and partner organisations.

The Inspectorate found that most forces make good use of problem-solving to tackle antisocial behaviour. Most forces were good at using problem-solving approaches to deal with recorded antisocial behaviour incidents. Many forces were making sure preventative policing becomes a core part of policing. Many forces used problem-solving approaches to identify issues as early as possible and work with external organisations to propose solutions. HMICFRS found examples where identifying antisocial behaviour had helped to reveal wider criminal activity. They also saw examples of effective working across different police teams to tackle the root causes of antisocial behaviour, such as neighbourhood police working with covert surveillance teams to gather intelligence on criminal behaviour such as drug dealing linked to antisocial behaviour.

Some forces need to do more to make sure problem-solving is integral to tackling antisocial behaviour. It was found in a few cases problem-solving plans lacked detail and had been completed to meet the minimum level required. It was also found that some forces were unable to explain in their plans what would be considered a successful result.

HMICFRS found that many forces use early intervention approaches to prevent antisocial behaviour. Forces were often good at using informal and formal interventions to deal with antisocial behaviour before it became a regular occurrence or spread to other areas. The use of warning letters, early intervention schemes and diversionary activities can help to reduce reoffending and the harms of antisocial behaviour in communities. Many forces had initiatives that provided activities for young people to help prevent them being drawn into antisocial behaviour and criminality. These diversionary activities were usually done in partnership with other organisations and charities.

Forces generally use statutory antisocial behaviour powers well to address antisocial behaviour. Many forces made good use of statutory antisocial behaviour powers. They work with partners to identify the most appropriate interventions to deal with the root causes of antisocial behaviour and to tackle repeat and persistent antisocial behaviour offending.

Forces don't always record the use of statutory powers. Some forces' recording of the use of statutory powers was poor. When the use of specific orders and legal remedies for antisocial behaviour isn't clearly recorded, it is harder to learn from previous experience. Poor recording makes it more difficult to see repeat victims and locations, or to learn from previous similar incidents. HMICFRS found some forces didn't always record their referrals or consider the effect of their referrals on other organisations.

Forces are recognising that continuity within neighbourhood police teams helps to tackle antisocial behaviour. HMICFRS found that forces were recognising the importance of keeping officers and police community support officers within neighbourhood police teams. Many forces have protected their neighbourhood teams from being used to manage other police demand, other than in exceptional circumstances.

The Inspectorate suggest that specialist antisocial behaviour advisers can help make effective use of antisocial behaviour powers. Many forces have a central team of antisocial behaviour experts to provide guidance on the range of legal powers available to tackle antisocial behaviour, and when to use them. Others provide clear information to their personnel on available powers and legislation. This helps them make better decisions on priorities and activities to reduce and address antisocial behaviour. Several forces had specialist resources to tackle particular antisocial behaviour problems, such as off-road motorbikes. They also had centralised portals for best practice.

HMICFRS found that police training on antisocial behaviour is inconsistent. High-quality training is essential for personnel to understand what antisocial behaviour is, how it links to other crime, the harm it can cause and the available interventions. The Inspectorate found a mixed picture on training and awareness of antisocial behaviour issues, powers and tactics. In some forces, training was poor or outdated.

Many forces share resources with other organisations to deal with antisocial behaviour. In most forces there was good evidence of effective partnership working with relevant external organisations at both strategic and local levels. This meant that the most appropriate organisation took the lead to address antisocial behaviour and that all available information was shared among partner organisations. Taking a joint approach to problem-solving increased the likelihood of effective actions by the police and partners.

Some forces need to improve how they evaluate outcomes. Some forces have improved their understanding of the economic analysis of antisocial behaviour interventions. These forces often work with external experts and use public feedback to help identify and measure benefits. However, too often HMICFRS found that the final assessment phase of problem-solving (to see if interventions had worked and how learning is shared between teams) was inconsistent or missing entirely.

## Recommendations

Eight recommendations are made within the report, five of which are directed at Chief Constables and forces nationally.

### Recommendation 1

By 31 March 2025, forces should review their processes for recording antisocial behaviour to make sure all antisocial behaviour and associated crime are recorded correctly.

### Recommendation 2

By 30 September 2025, forces should make sure personnel are appropriately trained to identify and record antisocial behaviour and associated crime when they are first reported.

### Recommendation 3

By 31 March 2025, forces should:

- review their risk assessment processes for antisocial behaviour cases to make sure that risks are properly assessed from initial contact to case closure; and
- make sure completed risk assessments are retained in line with management of police information guidelines.

### Recommendation 4

By 31 December 2024, forces should:

- make sure all antisocial behaviour problem-solving plans fully specify the problem, contain sufficient detail, are effectively supervised; and
- evaluate all antisocial behaviour problem-solving plans for an outcome in line with National Police Chiefs' Council Neighbourhood Policing Outcome and Performance Guidelines.

### Recommendation 8

By 30 September 2025, forces should give all neighbourhood policing teams antisocial behaviour training that makes best use of the College of Policing's antisocial behaviour guidance and resources.

## Areas For Improvement

There are no areas for improvement made.

## Chief Constable response to report and any Recommendations/Areas for Improvement

This spotlight report by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) entitled "*The policing response to antisocial behaviour*" brings together findings from the HMICFRS' police effectiveness, efficiency, and legitimacy (PEEL) inspection programme, their review of Force Management Statements, and the responses received to a promising practice request that was sent to all forces in England and Wales by the College of Policing. The report focuses on the prevalence and harmful nature of antisocial behaviour and the importance of effective police and partnership responses to it.

Within the report HMICFRS make eight recommendations aimed at bringing about improvements in how police forces and their partner agencies identify, record, and respond to antisocial behaviour. These include five recommendations which are specifically directed to all police forces and Chief Constables across England and Wales.

This spotlight report was published soon after we received our latest PEEL inspection report.

Through our PEEL inspection process, HMICFRS assessed that we have sustained our good performance at preventing and deterring crime and antisocial behaviour, which they concluded is making our communities safer and reducing harm and vulnerability. In his summary within the inspection report, His Majesty's Inspector of Constabulary for the Eastern Region, Roy Wilsher, remarked how well we reduce harm caused by antisocial behaviour, tailoring our work to meet the needs of different communities. The Inspectorate also praised how well we work with other agencies, with the common objective of making our communities safer, by effectively tackling emerging patterns or trends in antisocial behaviour and delivering long-term, sustainable plans to address the root cause of repeat problems. HMICFRS recognised that our Beat Managers and Operational Partnership Teams have high levels of knowledge and experience in solving antisocial behaviour and are confident in using appropriate legislation and powers to tackle emerging and persistent antisocial behaviour.

These positive findings reflect the importance that we place on addressing the antisocial behaviours that damage our communities, but we continually strive to improve our responses. I therefore welcome this report and accept the recommendations that HMICFRS have made.

We have completed an early review of our current position against each of the recommendations that HMICFRS have set for all police forces to determine the actions that we might need to take to help us to achieve the standards outlined, within the timeframes that have been specified. Our initial response to these recommendations is summarised below.

## **Recommendation 1**

**By 31 March 2025, forces should review their processes for recording antisocial behaviour to make sure all antisocial behaviour and associated crime are recorded correctly.**

The Constabulary has a National Crime/Incident Recording Standards Compliance Board which is chaired at an executive level by the Assistant Chief Constable for Local Policing. The recording of antisocial behaviour and associated crime is considered within this Board. Supporting this, the Constabulary has a Crime Data Integrity Quality Assurance Team that audits a percentage of the antisocial behaviour reports (CADs) that the Constabulary receives to assess recording compliance. This is alongside our Force Crime Registrar's independent audit programme which also examines antisocial behaviour recording compliance.

As part of their PEEL inspection of the Constabulary, HMICFRS undertook their own audit of incidents classed as antisocial behaviour and identified that we needed to improve our recording of crime linked to antisocial behaviour reports. In response to their findings a review of our processes has been commissioned, for which we are aiming to present our findings by February 2025.

Work has already commenced to refresh the training that members of our Contact and Control Room receive in taking reports of antisocial behaviour, which is being delivered alongside the introduction of a new antisocial behaviour call script which will better support the accurate recording of antisocial behaviour and associated crime by Control Room staff.

## **Recommendation 2**

**By 30 September 2025, forces should make sure personnel are appropriately trained to identify and record antisocial behaviour and associated crime when they are first reported.**

As referenced above, all staff who work in our Contact and Control Room receive training which supports them to identify and correctly record antisocial behaviour. There is a training package for all new staff and a refresher programme for existing staff. These training packages are being updated to reflect recent amendments to antisocial behaviour legislation. The new antisocial behaviour call script, which will replace the current question set, will better support Control Room staff to identify and appropriately risk assess and record reports of antisocial behaviour. This is planned for implementation in early 2025.

In recent years, the increased training requirement expected of forces has grown significantly. Consequently, we are experiencing an operational impact as staff abstractions from front line duties limit the number of deployable officers. We support the concept of further training, but this must be prioritised against other mandated training and the critical importance of maintaining operational capacity.

### Recommendation 3

By 31 March 2025, forces should:

- review their risk assessment processes for antisocial behaviour cases to make sure that risks are properly assessed from initial contact to case closure; and
- make sure completed risk assessments are retained in line with management of police information guidelines.

The Constabulary's current risk assessment process, which commences at the initial point of contact, is already under review as part of the implementation of the new antisocial behaviour call scripting process referred above. The call script that is being developed supports our existing THRIVE process which is used to determine the level of risk that an incident may present and the deployment of police resources.

When an officer deals with an antisocial behaviour related incident, they will complete a structured antisocial behaviour risk assessment which has a set of pre-defined questions that they must answer. This is recorded on Athena, our crime and incident recording system. The completed risk assessment will be reviewed by a supervisor based within one of our Operational Partnership Teams to ensure that the correct level of risk has been identified and that appropriate initial actions have been undertaken, and to determine any further action that might be needed.

The recording of these risk assessments on Athena ensures that they are retained in line with Management of Police Information guidelines.

In our recently published PEEL report, HMICFRS gave positive recognition for our antisocial behaviour risk assessment process, remarking *"The constabulary uses a structured risk assessment process to identify high-harm antisocial behaviour. It has a risk process map that shows clearly the activity required for different levels of antisocial behaviour. An incident risk score determines what action the constabulary or partner agencies needs to take. If an incident is scored four or less, it is reviewed by the relevant operational partnership team to decide on any further activity. If an incident is scored five or above, a neighbourhood officer will attend to speak with a victim to obtain more information and complete a secondary risk assessment. A supervisor reviews the assessment before allocating the case to an appropriate team. For cases deemed high-risk, the constabulary carries out immediate interventions to reduce the risk with increased oversight at senior level. This means the victims most in need of police support are identified and responded to quickly."*

### Recommendation 4

By 31 December 2024, forces should:

- make sure all antisocial behaviour problem-solving plans fully specify the problem, contain sufficient detail, are effectively supervised; and



- **evaluate all antisocial behaviour problem-solving plans for an outcome in line with National Police Chiefs' Council Neighbourhood Policing Outcome and Performance Guidelines.**

The Constabulary has a dedicated Problem-Solving Team who are part of our Community Safety Department. This team are subject matter experts and have received training from nationally recognised crime prevention and problem-solving academics. They write and implement our countywide Problem-Solving plans, and quality assure the Problem-Solving Plans (PSPs) that are developed by local policing teams. They regularly review these PSPs, checking for frequency of updates and for local supervisor reviews. If the PSP has been finalised, they also evaluate the finalisation outcomes in line with the National Police Chiefs' Council Neighbourhood Policing Outcomes and Performance Guidelines.

The Neighbourhood Policing Improvement Board, which is chaired by the Community Safety Superintendent, meets monthly and as part of its oversight role reviews neighbourhood policing performance data for each District. The performance data set includes a number of measures that relate to the quality of PSPs.

Through our recent PEEL assessment, HMICFRS acknowledged the improvements that the Constabulary has made since our last inspection in the way we are using problem-solving based approaches to address community issues, which they conclude is helping us to develop long-term, sustainable plans which address the root causes of repeat crime and antisocial behaviour issues.

In their review of our problem-solving plans HMICFRS found that the scanning and analysis sections of PSPs were detailed, were in line with the OSARA problem-solving model, and were proportionate to the problems being identified. The inspectorate also found that we have made improvements in how we evaluate our problem-solving approaches and how we assess the effectiveness of the measures that have been taken to address antisocial behaviour. Within our PEEL inspection report, HMICFRS recognised that before closing a problem-solving plan, an in-depth assessment is carried out by the person responsible for the plan, relevant stakeholders, and a Problem-Solving Advisor. HMICRS remarked "*This assessment makes sure all responses have been completed before the plan is closed. In some cases, a new plan is created if the original problem has changed significantly. The constabulary shares plans using a digital application called My Beat. When appropriate, the constabulary consults communities to make sure the problem has been resolved.*"

Whilst HMICFRS found that our Problem-Solving Team and Operational Partnership Teams regularly carry out quality assurance reviews of problem-solving plans and offer advice and guidance to those responsible for the plans, some problem-solving plans were not being reviewed by local supervisors as often as they should be. We have responded to this feedback and improvements in the local supervisory review process are being driven through the Neighbourhood Policing Improvement Board.

## **Recommendation 8**

**By 30 September 2025, forces should give all neighbourhood policing teams antisocial behaviour training that makes best use of the College of Policing's antisocial behaviour guidance and resources.**

Beat Managers and their Sergeants who form our Safer Neighbourhood Teams receive regular training on a range of topics that support them to perform their neighbourhood policing role. This includes training on effective community engagement, Problem Solving, appropriate use of preventative powers including Stop and Search, and the use of preventative orders to address antisocial behaviour.

Through our recent PEEL inspection HMICFRS recognised that officers are using a range of appropriate powers with partner agencies to effectively tackle emerging and persistent antisocial behaviour, which reflects positively on the training and guidance that the Constabulary has provided for officers working in neighbourhood policing roles.

As well as reviewing the antisocial behaviour guidance and resources that the College of Policing has developed to ensure that it is incorporated into our existing training, we have recently reached out to the College in relation to an induction training package that it is developing for officers who are new to their neighbourhood policing role. This is being trialled by a number of police forces and we are consulting closely with one of the pilot forces to learn from their experiences.

Progress against this recommendation will be monitored by the Neighbourhood Policing Improvement Board.

## **PCC response to report and any Recommendations/Areas for Improvement**

As the HMICFRS report “The policing response to antisocial behaviour: PEEL spotlight report” acknowledges, antisocial behaviour (ASB) can have a significant impact on communities. In my role to hold the police to account on behalf of the public, I am reassured not only by the most recent PEEL report, but also by correspondence received from residents in Norfolk that where antisocial behaviour is reported, Norfolk Constabulary’s response is appropriate, effective and recognises the substantial cumulative impact that ASB has on individuals, families, businesses and wider communities.

I welcome the many useful observations within the report, and acknowledge the recommendations expressed. I am however concerned by the operational implications of some of these recommendations and their timescales, for a small constabulary such as Norfolk. This is particularly with respect to the consideration of training requirements. I am encouraged by the constabulary’s response to these recommendations and assured by how much good practice is already in evidence in the county.

While the report notes that Constabularies can do more on the whole to respond to ASB, it also acknowledges the “need to continue to work consistently and share resources with community-based partner services to prevent, respond to and reduce antisocial behaviour”.

My observations tell me that while the Norfolk Constabulary’s response to ASB has been found by HMICFRS to be good, the erosion of services over many years has left many Norfolk villages and towns without anything like the level of provision they once had, particularly for teenagers and young adults. For many people I speak with, this reduction in youth clubs and services is related to their perceived increase in ASB. However, we know that causes of ASB can be complex and extend far beyond the provision of youth clubs. In many ways, the best response to ASB is to take proactive action to prevent it. And in so doing, services and provisions can be improved for the whole of the affected community. For these reasons, and given the emerging priorities within my Police and Crime Plan, I will be paying attention to the means by which more of these services can be provided in the county.

### **For Office Use Only:**

- Response forwarded to the Chief Constable.
- Response forwarded to the Norfolk Police and Crime Panel.
- Response published on the OPCQN website.
- Response submitted on the HMICFRS Monitoring Portal.