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My Ref RC/SH/SEO Scrutiny

Please ask for: Sarah Hopkins

Date 29 October 2014

Dear Police and Crime Commissioner,

**SCRUTINY BY DEVON AND CORNWALL POLICE AND CRIME PANEL IN RESPECT OF
“POLICE AND CRIME COMMISSIONER’S JOINT ANNOUNCEMENT WITH THE CHIEF
CONSTABLE IN RESPECT OF DEVON & CORNWALL POLICE “PUBLIC CONTACT
STRATEGY” – STATION ENQUIRY OFFICES’ RATIONALISATION”**

I would like to thank you and your colleagues, on behalf of the Devon and Cornwall Police and Crime Panel, for attending Devon and Cornwall Police and Crime Panel on 17 October 2014 in respect of the above reactive scrutiny item. I hope you found the select committee style approach to the scrutiny process a useful mechanism, with the right balance of both support and challenge in respect of your proposals, and a positive and useful exercise.

Following comment by the Panel, I am pleased to now provide you with the Panel’s draft report of findings and recommendations for your consideration, prior to a final decision being made by yourself and the Chief Constable in relation to the front desk closure proposals.

Please be advised that the report will be formally reviewed and agreed by the PCP at its meeting on 19 December 2014 and following the meeting (and in accordance with Section 28 (7) of the Police Reform and Social Responsibility Act 2011) it will be published on the Host authority’s website and on the Police and Crime Panel website with copies being sent to the Witnesses. At the 19 December 2014 meeting you will be given opportunity to verbally comment on and respond to the report. If however you also wish to provide a written response prior to the meeting, this response will need to be forwarded to Sarah Hopkins by 30th November 2014 and it will be included as an appendix to the report and reviewed accordingly by the Panel.

Yours sincerely

Councillor Roger Croad
Chair, Devon and Cornwall Police & Crime Panel

Cc: Andrew White, Chief Executive & Monitoring Officer
Shaun Sawyer, Chief Constable

(Plymouth City Council is the host authority for Devon & Cornwall Police & Crime Panel and views expressed by the Panel are not necessarily those of the Authority.)

Devon and Cornwall Police and Crime Panel (PCP) report to Police and Crime Commissioner's (PCC) following scrutiny of the "Police And Crime Commissioner's Joint Announcement with the Chief Constable in Respect of Devon & Cornwall Police "Public Contact Strategy" – Station Enquiry Offices' Rationalisation" at the Panel meeting held on 17 October 2014.

Introduction

The Police Reform and Social Responsibility Act 2011 Section 28 (6) states that the PCP must "review and scrutinise decisions made or other action taken by the PCC in connection with the discharge of their functions"

The PCP recognises the importance of supporting the PCC in the effective exercise of his functions.

The PCP, at its meeting on 20 June 2014, agreed the above issue as the first 'reactive' scrutiny topic for 2014/15. It was agreed the scrutiny review would be undertaken adopting a 'select committee' style approach.

The outcome/objective of the scrutiny exercise was as follows:

- To reflect the community views of the impact of the changes to opening/closing times of station enquiry offices, and the impact of any 'closures' on people's feelings of safety and relationships with the Police
- To influence, on behalf of those communities directly affected, the decisions being taken by the PCC and Chief Constable in respect of these plans as part of the 'consultation' which closes on 31 October 2014

The PCP is satisfied that this scrutiny topic meets the PCP's agreed scrutiny criteria in particular:-

- **Public Interest:** the concerns of local people should influence the issues chosen for scrutiny
- **Ability to Change:** priority should be given to issues that the PCP can realistically change

The PCC, accompanied by officers from the Office of the Police and Crime Commissioner (OPCC), the Chief Constable and Chief Superintendent Emma Webber attended a meeting of the PCP on 17 October 2014 to hear written evidence, along with evidence provided by witnesses, in response to this 'reactive' scrutiny topic.

Members present: Cllrs Croad (Chair) and Rule (Vice-Chair)

Councillors: Barker, Batters, Eddowes, Excell, Haywood, James, Rennie, Saltern, Sanders, Kate Taylor (substitute for Councillor Penberthy), Toms (substitute for Councillor Brown) and Wright.

Independent Members: Ms Atkinson and Ms Rapson.

Apologies for absence: Councillors Brown, Hare-Scott, Inch, Penberthy and Sutton.

Also in attendance: Sarah Hopkins, Community Safety & Partnerships Manager, Jo Heather, Portfolio Advisory and Scrutiny Officer, Cornwall Council, Tony Hogg, Police and Crime Commissioner, Andrew White, OPCC Chief Executive, Lisa Vango, OPCC, Shaun Sawyer, Chief Constable, Emma Webber, Force Strategic Manager, Councillor Tisdale, Stithians Parish Council, Camborne, Councillor Robert Drew, Carn Brea Parish Council, Jeremy Joslin, President Hayle Chamber of Commerce, and Katey Johns, Democratic Support Officer

Written Evidence

The Host Authority, on behalf of the PCP and in liaison with the Chair and Vice Chair of the PCP, prepared and presented a report which included a wide range of community and stakeholder engagement undertaken by the Host Authority and other evidence also gathered by the Host Authority. The aim was to assist the PCP with establishing for itself the level of knowledge, understanding and any concerns that existed about the proposals, and particularly in the areas directly affected, and present these to the PCC and Chief Constable. The report included:

- Copies of letters from:
 - ACC Paul Netherton dated 18 March 2014 and a further letter jointly signed by, the PCC and the Chief Constable dated 13 May 2014 both of which were sent to Leaders and Chief Executives of all Councils in the force area, along with MPs, Lord Lieutenants, High Sheriffs and the LCJB;
 - A covering letter sent to the Chair of the Police and Crime Panel, dated 14 May 2014 which included a statement that “The force is to announce shortly that it will enter a period of consultation with a view to closing twelve Police Enquiry Offices from 31 October 2014.”

These letters laid out the details of the proposed Station Enquiry Rationalisation proposals and areas affected. A copy of the latter was provided to the Panel previously at the PCP meeting on 20 June 2014.

1) Feedback about the proposals was collated and summarised by the Host Authority on behalf of the PCP via:

- PCP Members and Councillors from their respective local authorities,
- an ‘open’ letter invitation published on the PCP website for communities across the force area to comment on the proposals; and
- A letter sent direct to stakeholder businesses/organisations, partnerships & agencies including:
 - Community Safety Partnerships in Devon and Cornwall
 - Devon and Cornwall Probation Trust
 - Age UK (Devon) and Age UK (Cornwall)
 - Victim Support
 - Devon & Cornwall Community Watch Association
 - Heart of the South West Local Enterprise Partnership
 - Devon Grapevine
 - Devon ReForm
 - Chambers of Commerce in Devon and Cornwall

There were many responses received, including a large majority which came from Town and Parish Councils across Cornwall. Analysis of the feedback concluded that:

- Many of the Parish and Town Councils from Cornwall that responded stated they were not aware of the proposals and did not recall being, or had not been, consulted.
- Many respondents were not aware of the ‘new Contact Strategy’ or “communication and engagement plans” and what the proposals were to explain the ways in which engagement and accessibility between the Police and the public would be enhanced in other ways.
- Concern re the lack of Police attendance at Parish and Town Council meetings.
- Concerns were raised about the 101 service.

- Concerns were raised about opening hours during the summer season in Cornwall when there are many visitors to the area.
 - Concerns generally about a lack of Police visibility, contact and presence, and particularly in rural Parishes and in some town areas.
 - There was some appreciation of the economic factors driving these decisions and the need to rationalise, but that other means of contact with the Police needed to be strengthened.
 - There were some suggestions for alternatives, eg operation of a ‘roster/duty session’ system amongst Police team members in stations affected.
 - There were some queries about when the savings would be realised and whether the stated £750,000 would be reinvested in frontline policing.
- 2) Information was requested from, and supplied by the PCC including:
- The ‘detailed examination’, what this involved and shows – ie. consultation responses
 - A map locating front desk closure locations to aid rationale
 - Policing numbers of those areas affected overlaid by population of each
 - Age profile of areas affected
 - Footfall facts/figures of each station enquiry office affected
- 3) Analysis of the information supplied by the PCC concluded that:
- In 2010/11 the review into Station Enquiry Offices resulted in a reduction from 57 to 21. The revised Comprehensive Spending Review in 2014 led to a further review and subsequent proposals to close a further 12 of the remaining 21 Station Enquiry Offices – leaving only 9 across the entire Police Force area of Devon and Cornwall.
 - It does appear from the map of remaining 9 Station Enquiry Offices that there is a disproportionate lack of Station Enquiry Office provision between Bodmin, Barnstaple and centrally in the Force area with most remaining offices predominantly covering from Camborne in the far south west, along the south coast to Torquay in the south east and from there up to Barnstaple.
 - It is clear that extensive public surveys were carried out by the Police in 2010 that supported the 2010/11 review. But other than some more recent ‘stakeholder’ consultation it is not clear what further consultation, or what further awareness raising with the public has been carried out by them, if any, in relation to this second review.
 - The decisions in respect of this more recent review appear to have been made reliant predominantly on 2010 consultation, and based on ‘professional judgement’. This has been further supported by footfall analysis, combined with a focus on 6 other issues including for example population, location, Custody Centres and Courts. However, other than the PCP’s recent ‘call for evidence’ to inform this scrutiny topic, it is not clear what has been done further by the Police to consult the public or raise awareness of these further reductions in Station Enquiry Offices and to actively promote the other forms of accessibility that are available other than ‘station signage’.
 - There are continuing concerns about the 101 non-emergency number.
 - It is not clear from the information provided how aware the public are of this second round of closures.
 - Although requested, the associated ‘Contact Strategy’ and detailed ‘Engagement Plans’ were not provided by the PCC.

Evidence from Witnesses

Given that much of the feedback came from a number of Town and Parish Councils in Cornwall and of those that responded, many said that they were unaware of the proposals and did not recall being

consulted about them, the following witnesses were invited to the PCP's meeting on 17 October 2014 to take part in the review and attend to give verbal evidence:

- Councillor Pete Tisdale, Stithians Parish Council, Camborne
- Councillor Robert G Drew, Carn Brea Parish Council
- Mr Jeremy Joslin, President, Hayle Chamber of Commerce

Their feedback (combined and summarised here) included concerns about the following:

- Reliability of the footfall data that determined the proposals
- Lack of Policing particularly at peak times in 'holiday destinations' during the summer
- That some older people may be less likely or less able to contact the Police via modern IT access as opposed to face to face contact
- The lack of Police presence at community meetings and reducing or no 'monthly reports' provided
- The varying degree or lack of telephone signals in some parts of Cornwall and therefore lack of mobile phone and internet connectivity
- Effectiveness and reach, and lack of the consultation particularly with Town and Parish Councils about these proposals
- Lack of the resilience of the alternative means to contact the Police that are timed to coincide with the proposed closures
- Little or no knowledge of, and unable to find/access the 'Contact Strategy' or 'local engagement plans' and if they exist, why haven't they been created 'with' communities?
- Suspicion of the research methodology and decisions made on the basis of 'professional judgement'
- Communities haven't been asked 'what they want' and 'how they can help'
- The efficiency and effectiveness of the 101 service and that due to these issues, incidents were failing to be reported as there was no faith in the service
- Processing issues linked to safeguarding
- Concern that Falmouth's offer for its One Stop Shop to be used as a community hub was 'turned down'
- The public's perception that their safety could be jeopardised by the closures and that the closures would distance the Police from the public, potentially fostering a "them and us" culture.

Their feedback also included some suggestions, namely:

- Consider a 'Blue Light Information Centre' model, possibly hosted by the Chamber of Commercials and using volunteers.
- Consider using more honest terminology when communicating – say 'closures' rather than use the term 'rationalisation'.
- Consider communities for 'self-help' solutions and involving communities in co-designing solutions in the future.
- If Police are no longer attending Town and Parish Council meetings, it would be helpful if the Police communicate this and explain why and what alternatives there might be.

PCP Questioning:

What followed was a series of questions put by the PCP to the PCC and the Chief Constable as follows:

- The decision to close this second round of Station Enquiry Offices has been made based on old (2010/11) consultation feedback. Have you carried out further/more recent consultation in order to inform this decision?

- Public Contact Strategy – how has that gone?
- Recent footfall figures in March – concerned if the only ‘snapshot’ of footfall used?
- A recent press release has revealed that, between May and August 2014, Devon and Cornwall Police failed to meet guidelines for answering at least 90% of 999 calls within 10 seconds – falling short of the national target by 2,680 calls for that period. However, police figures show the force had exceeded the 90% target between September 2012 and April 2014.
- Do you, in any way, relate this to the inefficiency of 101 ie. that more people are calling 999 and do you think the closure of more Station Enquiry Offices may make this worse?
- Feedback has shown that people are still not confident with access via the 101 number - what progress has been made to date to improve this, and what have you done to ensure these improvements coincide with these closures?
- Can someone ring 101 and make an appointment to see a ‘specialist officer’?
- In respect of the Business Case for these closures. Has an Equality Impact Assessment of the proposed closures been conducted? (and if so, could the Panel have sight of a copy?). What groups representing people with disabilities have been consulted, and how does the PCC intend to meet the Police’s commitment to the Safe Places scheme?
- Various alternative saving mechanisms/options were considered by the Police Chief Officer Group before the decision was made – what were they?
- Page 90 of the report shows that £7.8M more than budgeted was contributed to reserves in 2013/14. The original letters says ‘can’ direct rather than ‘will’ direct. How, where and when are you going to reinvest the projected savings of £750,000 pa into frontline policing?
- The public interface between the Police and the public is withdrawing/ diminishing – and these proposals are a further example where you are closing public-facing facilities.
 - What will the buildings be used for if they are not being sold?
 - Have you considered other options eg closure of police stations, and/or sharing other facilities as alternatives?
 - Have you considered potential use of community hubs with PCSOs present at times?
- It appears there is a disproportionate lack of Station Enquiry Office provision between Bodmin and Barnstaple and centrally in the Force area. How will the public, and particularly the large influx of tourists visiting those areas in the summer, be made aware of these new arrangements and the alternative arrangements for contacting the Police?
- What are the alternative ways to access the Police via ‘Police Station Doors’ in those stations affected by both previous and these proposed closures?
- Much mention has been made of the ‘Contact Strategy’ and detailed ‘Engagement Plans’ which you advise will outline new opportunities for public engagement including face to face and via digital media - but these still appear to be ‘in development’.
 - Are the new proposals in progress?
 - will they be publically available in time to coincide with the closures?
 - how aware do you think the public are aware of them, and their content?
 - When are we going to see the plans for alternative engagement and contact with the Police?
- It has come to light that there may be a review of the custody centre provision. Is this the case? If so, what consultation has been carried out on this and, if so, why have the Police and Crime Panel not been consulted?

The responses have been combined and summarised as follows:

- Consultation was largely based on letters, footfall and the evidence base and engagement from 2010. The reason why these stations weren’t closed in 2010/11 was it was anticipated we would be out of recession by 2014. But the Comprehensive Spending Review brought about further pressures and a requirement to revisit the situation.
- A lesson has been learned about being more inclusive of Town and Parish Councils in Cornwall in future consultations.

- The conundrum is if cuts are not made here, then where?
- The Contact/Engagement Strategy takes us to 2018 – this is not a retreat from public engagement. But there are 400 less Police Officers.
- Front Office provision is not an ‘engagement function’.
- Two footfall surveys were undertaken in November and August 2010/11 and March 2014.
- 999 did fall below 90% during summer. It was a busy period, and Control Room staff had been taking longer to complete new formulaic ‘vulnerability assessments’ along with the implementation of the new Unifi system all of which have had an impact.
- The Chief Constable is confident that 101 will not be impacted by front desk closures.
- The PCC has undertaken a detailed review of 101. The fieldwork is complete and a definitive report is being written on performance of the 101 service. This will be published and provided to the PCP at its next meeting. Desired standards will be worked through.
- There is an appointment system in place which needs ‘tweaking’ and needs making more visible to the public and quicker to make those appointments.
- The Chief Constable is looking at how Blue Phones can jump the queue to the top of 101.
- An Equality Impact Assessment was carried out for the last and this review including direct liaison with members of the Strategic Independent Advisory Group. Also a community impact assessment was carried out.
- The PCC has officers in his team looking at Safe Places Scheme.
- The Chief Constable advised there weren’t that many alternative options but is happy to share them. Using volunteers in Police Stations was considered, but in law people cannot be made redundant and then replaced with volunteers.
- It was acknowledged that the Police has failed to get the message across in Cornwall about the closures – but had done better at getting the message across in Devon.
- All but £6M of our Police reserves are held against specific plans. There are plans for the forward and effective use of our reserves. Reserves are never a means of sustaining ongoing operational requirements.
- £750,000 is in effect being reinvested into eg 101 and to improve technology but sustainability over the next four years is important. The reality is it will not be reinvested, but will contribute to a £14.8M budget gap. The Police are re-engineering and changing services in a way that is responding to communities and which may include more people in call centres.
- Much of the construction of the next four years relates to the Police reserves in the fourth year, and what the Police are trying to do over the next four years. There is a smoothing fund to try and smooth the vagaries of Policing and year on year, with eg council tax changes which are audited by the PCP, that money will contribute to the ‘in and out’ of smoothing funds and reserves over a four year period which will be looked at as part of the budget for next year. Debate re the necessity, as the pressure comes on, to redefine the reserves position and looking at taking ‘risk on risk’ on reserves, there are risks to consider including job evaluation and A19 which are all built into the reserves.
- The Police are closing front offices, but are not closing police stations. They are looking at joint agency, One Stop Shops including using Falmouth Station differently. They could provide a report on all the joint work on buildings.
- In the previous round of closures Okehampton was kept open even though the business case did not stack up for Okehampton, along with keeping Launceston open. However, the Chief Constable could not justify keeping Okehampton open in this round. However, Launceston remains a particular concern to the Chief Constable and to the PCC. The custody suite is the factor at Launceston and why that has been kept open. A large amount of footfall at Launceston is in relation to visits to the detainees in custody centre itself.
- The Estates Programme is an important and complex one. The PCC can now take a more business approach to sites to boost revenue through entrepreneurial means.

- Acknowledged that there is a huge gap in how remaining front enquiry desks are distributed in Cornwall. Whilst a concern, it is about encouraging other means to contacting Police. Launceston is a particular concern.
- The Chief Constable is happy to share the engagement plans. The view is that people are not visiting police stations, it is about the Police getting out into communities.
- There are 400 less Police Officers, but PCSO numbers have not been reduced where other forces have cut them. There are 10% less Police Officers than 4 years ago and may continue to reduce. This is about the public playing a greater part and making communities more resilient.
- This is about legitimacy of policing, the public interpret this as 'presence'. The Chief Constable confirmed he needed to raise the game in terms of police visibility. However, there are other challenges where officers are pulled into other less visible areas, eg domestic abuse, internet/cyber-crime, but are still keeping people safe.
- Acknowledged by the PCC and Chief Constable that they need the support of the Panel to help get messages out there.
- The Engagement Plans are work in progress. They are there, and in development. People can use Crime Online and the appointment system.
- The PCC advised that the decision about these closures has been made but the PCC offered to provide information as to how the consultation is working.
- Consultation on any review of custody centre provision including in Launceston is just starting. A plan/proposals have yet to be put to the PCC by the Chief Constable.

The Findings:

Having reviewed the written evidence, heard from the witnesses, and having conducted a comprehensive and searching question and answer session between the PCP, the PCC and the Chief Constable, the following findings were identified by the PCP:

- Lack of engagement with Town and Parish Councils (particularly in Cornwall) has been acknowledged.
- A review of Police Custody Centres is in its infancy.
- No account of, or consideration has been given to, options for community-led models but there is clearly a will in communities to help Police with their challenges
- 101 still appears to be ineffective, which is a concern that has not been fully addressed and improved to coincide with these proposals being implemented. This is a key crime reporting tool and there is not a robust alternative
- There are not enough staff at the Contact Centre who deal with 101 calls.
- There is a possibility that 'Blue Phones' outside Police Stations could take priority in the 101 queue which is welcomed.
- Equality Impact Assessments have not been shared.
- A robust alternative for IT is needed – many people do not use, or are unable to use, or have no access (including connectivity) in rural areas and areas of poverty.
- Local Engagement Plans do exist and are in development.
- The alternative options to the front desk closure proposals were not shared.
- That the PCC has stated that the 'decision' has, in effect, been made about these closures which will commence from 31 October 2014.
- The public are not aware of the range of services on offer to discuss matters with the Police eg the option for a 'visit if prepared to wait'.
- It is not clear what joint working opportunities/initiatives are being undertaken now and what consideration is being made in relation to this in the future
- It is not clear what plans there are for the future use of the Police estates portfolio.
- Wider engagement, prior consultation and communication by the PCC is key and there is a need to work more together as a whole ie. the PCP supporting the PCC who in turn supports the Chief Constable.

- The PCC needs to recognise the value of the role of PCP as not just being about scrutiny, but that it can also provide support and advocacy and there is a willingness amongst PCP members to assist with communicating with communities.
- Whilst it is acknowledged and understood that public sector cuts are, in part, a driver of this decision, other factors include societal changes in general in preferred methods of communication.

The Recommendations:

Having considered the findings, the PCP would make the following recommendations to the PCC:

- A mechanism for more effective engagement, communication and consultation, particularly with Town and Parish Councils about future decisions should be addressed and ensured.
- That the PCP is consulted by the PCC at the earliest opportunity in respect of any review of Police Custody Centres and any other future key decisions.
- Opportunities and the willingness that already exists in communities to help the Police with these and future challenges should be encouraged, considered and maximised on
- A report be provided to the PCP in respect of 101 performance and following the recent 101 consultation, with a more definitive and clearer statement being included in relation to its performance.
- Consideration be given in relation to increasing staffing levels in the Contact Centre dealing with 101 calls
- The possibility of the 'Blue Phones' outside Police Stations taking priority in the 101 queue should be explored.
- The PCP be provided with Equality Impact Assessments for this and future decisions.
- A robust alternative for IT should be developed to take account of the issue that many people do not use, or are unable to use, or have no access (including connectivity) in rural areas and areas of poverty. This alternative should be reported back to the PCP.
- The Local Engagement Plans should be provided to the PCP along with any 'communication/contact strategy' and these documents should be made easily accessible to the public.
- The PCP be provided with details of the alternative options considered in relation to the front desk closure proposals.
- All consultation undertaken to inform the front desk closure proposals, including this report from the PCP should be considered prior to a final decision being made.
- The PCC should communicate more widely with the public regarding the range of options for meeting with Police officers.
- The PCP be provided with details of any current joint working opportunities/initiatives that are being undertaken now and what consideration is being made in relation to this in the future
- The PCP be provided with the plan for the future use of the estates portfolio, including a more business/entrepreneurial approach.
- Consideration should be given to the value of the PCP's support and wider engagement, prior consultation and communication with the PCC in order to work as a whole ie. the PCP supporting the PCC who in turn supports the Chief Constable.
- Consideration should be given in relation to how the PCP can assist with support, advocacy and the dissemination of information and communication to communities in respect of any key decisions in the future.

Final comments:

Section 28 (7) of the Police Reform and Social Responsibility Act 2011 states that the PCP must publish any Reports or recommendations. This Report will be:

- Circulated to PCP Members for initial comment and then submitted in draft form to the PCC prior to 31 October 2014 for consideration prior to a final decision being made by the PCC and Chief Constable in relation to the front desk closures.
- And will then be formally reviewed and agreed by the PCP at its meeting on 19 December 2014 and following the meeting it will be published on the Host Authority's website and the Police and Crime Panel website with copies being sent to the Witnesses.