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Date 13 February 2015

Dear Tony,

### **Plymouth's Response to the Consultation on the Police and Crime Commissioner's Proposals for a Refresh of the Police and Crime Plan for 2015/16**

Thank you for the opportunity to consider your proposals for a refresh of the Police and Crime Plan for 2015/16 as part of your consultation process. We are pleased to be able to provide you with Plymouth's response to that consultation.

Plymouth welcomes the emphasis and increased focus in the Plan particularly:

- the new and emerging threats of:
  - Child sexual exploitation,
  - Sexual offences, and
  - Cybercrime.
- A prevention bias.
- A refinement of the Criminal Justice priority with particular areas of focus that include the issue of mental health.
- Partnership working around local activity that addresses anti-social behaviour, low-level crime and community safety issues.
- That community safety and neighbourhood policing remains a priority.

We are pleased that you continue to meet regularly with us, and would like to take this opportunity to reiterate some issues and challenges raised in these meetings that reflect Plymouth's unique characteristics and challenges within the Force area. We would, therefore, ask you to ensure these are acknowledged in your finalised Plan:-

- Plymouth has a quarter of the crime in Devon and Cornwall and, therefore, Policing resources need to continue to reflect this.

- The full impact of welfare reform has still yet to be felt in the city, together with the potential for associated rises in levels of crime which are likely to be disproportionate to other areas across the Force.
- The disproportionate level of domestic abuse in Plymouth.

We would also like to tackle this opportunity to reiterate our pledge “To campaign against any further Government cuts to Police, PCSOs and Firefighters in Plymouth.”

We agree with your ambition to achieve much better alignment between the Joint Strategic Needs Assessments (JSNA) and the annual Peninsula Strategic Assessment and we will support the strengthening of this through our representative on the Peninsula Crime Analysts Network.

We would reiterate our concerns that, up until now, the performance measures in the Plan have been insufficiently ‘SMART’. Whilst you remain committed to the framework that was introduced for the current Police and Crime Plan, which has been adopted by Safer Plymouth, we will be interested to see how these will be updated and revised as part of this refresh.

With regard to some of the specifics you have highlighted, we would like to make the following points:

#### **CHILD SEXUAL EXPLOITATION:**

1. We take very seriously, our critical role in safeguarding children and adults. We wholeheartedly welcome the prominence on child sexual exploitation, which we would want considered in the context of all child sexual abuse, in your refreshed Plan. We would suggest, however, this could be better achieved together if you considered strengthening relationships, involvement and investment at a local level in supporting the work of, for example; Plymouth’s Children and Young People Partnership, Plymouth’s Safeguarding Children Board, Plymouth Safeguarding Adults Board, and the Youth Offending Service Board to deliver against your ‘whole system’ vision and desire for a more coordinated approach.
2. We also welcome your desire to ensure there are more and varied opportunities for victims of historic sexual exploitation to report crimes and for support to be provided for them. We would welcome sight of the findings of your ‘historic reviews’ and how you propose to use the findings to improve deficient investigative approaches and steer the Force on activities to increase opportunities for reporting historic sexual exploitation.

#### **SEXUAL OFFENCES:**

3. We welcome increased prominence of this issue in your plan, and share your concerns about the levels of sexual offences that are reported and concerns about those that continue to go unreported. This needs to be understood much better. We would be particularly interested to see the findings of your surveys and research to help us better understand the reasons for non-reporting and ensure that we, and other agencies, can assist with improving reporting.

#### **CYBERCRIME:**

4. We welcome the increased prominence in your refreshed Plan in response to the increased demand and threat that this poses to the public. Whilst we fully appreciate the need for this, we are concerned about how the Force will balance enhanced capacity and capability around this issue without impacting on front-line ‘visible’ policing at a time of unprecedented reducing budgets and already stretched resources. A clear indication of this should be included.

## **PREVENTION BIAS:**

5. It is good to see the emphasis you put on preventative measures which reflects our own commitments to early intervention and prevention. We would, therefore, be very interested to learn more about the initiatives you are developing and trialling, particularly with regards safeguarding, advice for victims on how to avoid becoming victims/re-victimised, and how you intend to ensure the work of your 'Prevention Directorate' joins up with existing local delivery, for example Plymouth Safeguarding Children Board, Plymouth Safeguarding Adults Board, Community Safety Partnerships and Health and Wellbeing Boards. Further, it would be helpful if you indicated how you see the resource shift from reaction to prevention to realistically deliver against this objective.

## **A REFINEMENT OF THE CRIMINAL JUSTICE PRIORITY:**

6. We welcome your continued commitment to improving this and your specific areas of focus and attention. However, Full Council in Plymouth has expressed significant concerns about the risks associated with the changes to offender rehabilitation services. We would, therefore, welcome further information on the role you intend to play in helping ensure providers and commissioners of these services are held to account to deliver reductions in reoffending through robust, high quality services.

## **LOCAL PRIORITIES/NEIGHBOURHOOD ENGAGEMENT & POLICING:**

7. We totally recognise the need for local activity that brings partners together to address anti-social behaviour, low-level volume crime and community safety issues. We believe we already have effective partnership arrangements in place in the form of the Safer Plymouth Partnership and the Safer Plymouth Team to address such local community safety issues. Plymouth also has a good track record in effectively driving down crime such as anti-social behaviour and serious acquisitive crime, even in a climate of tighter/less resources. Our "Don't Walk By" joint enforcement initiative is a good example. We would welcome more explicit support from you for such innovation at local level.
8. We see that you have an 'expectation' for partners to carry out proactive engagement with the public to actively seek/gather their views and address their priorities. We are currently refreshing our approach to public engagement following cabinet's adoption of a "Framework for Working with Citizens and Communities." We would welcome your support as we roll out implementation of this.
9. We agree that it is vital that community safety remains a priority and that it should be adequately resourced within local authorities. However, we would ask that you maintain your commitment to existing commissioning arrangements through Safer Plymouth and consider how you can help us with the challenge of encouraging other partners to invest and resource this. We would also ask that you maintain your current financial commitments to the Plymouth YOS, and Safeguarding Boards.
10. We share the HMIC's concern about the potential for erosion of the neighbourhood policing model and the need to protect this. We recognise this vital resource as a means to maintaining visibility, as a source of intelligence, as a preventative function, delivering community safety effectively and key for public reassurance. This can only be further eroded and undermined by cuts in funding. As mentioned above, it is a priority for Plymouth to campaign against any further Government cuts to Police, PCSOs and also Firefighters in Plymouth. You stated in your Plan that you will "lobby our national Government to deliver a better police funding settlement for Devon, Cornwall and the Isles of Scilly", and would recommend that you restate your firm commitment in doing so.
11. We further suggest that, with regard to your commitment to halting the decline in police numbers, that the Plan makes an explicit commitment to ensuring officers are deployed fairly

and proportionately against evidence of need across the peninsula. Transparent publication of evidence of this, and how it will affect Plymouth in particular, would be welcome.

## **STRATEGIC ALLIANCE:**

12. In respect of the Strategic Alliance, we recognise that this is still an area of development and look forward to hearing more about the progress being made and how this alliance will assist you with unlocking efficiencies.

## **WHAT WE THINK IS MISSING/NEEDS STRENGTHENING IN YOUR REFRESH PROPOSALS:**

13. Given the recent concerns raised at the Police and Crime Panel about the fall in Neighbourhood Watch engagement in Plymouth (which may be an indicator for the rest of the Force area) we are surprised there is not more of an emphasis on how you are prioritising and encouraging volunteering, beyond the traditional examples. Additionally, we support your recruitment-drive for additional Special Constables and deploying them in specialisms, however, we would question how effective you have been in delivering on this commitment to date for Plymouth.
14. It is concerning that little mention has been made in your main Plan and subsequent refreshes in respect of Preventing Violent Extremism. Given recent events and heightened tensions around this issue, together with proposals for a new statutory 'Prevent Duty' on Police & Crime Commissioners, we strongly recommend that you make wider reference to this in your refresh.
15. Issues around the 101 service are ongoing, and have been subject to a scrutiny review by the Police and Crime Panel. We feel it would be timely, and pertinent, to restate your commitment to improving this and delivering on the recommendations emerging from your own review of the 101 service within a prescribed timeframe.
16. Regarding section 136 of the Mental Health Act 1983, (children, young people and adults suspected of being mentally ill and in "need of care or control" being taken to a safe place for assessment) we have concerns about the "exceptional circumstances" where psychiatric units or children's homes are unavailable, meaning people are placed in cells. As a leading partner in delivering local action plans for Devon and Cornwall in respect of the Mental Health Crisis Care Concordat, we believe that your refresh needs to have a far greater emphasis in how you will work with partners to address this problem.

We would like to highlight a couple of commitments you have made in the main Police and Crime Plan 'Safer Together' 2014-17, namely:

- (page 17) You will "Raise awareness and improve education about the harm caused by alcohol, in particular to raise awareness amongst young people and parents."
- (page 21) "...the scope to secure funding from new sources such as European funding streams and central Government Innovation Funds..." and "...the amount of income received for services provided by the Police...we need to explore how we can improve this picture."
- (page 23) You will "bring forward new ideas and proposals, and help to identify areas where collaboration or new service approaches might deliver savings or generate income. For example, with the voluntary and community sector."

It is not clear what progress or activity has been undertaken in these areas and, therefore, we would like to understand more about how you intend to achieve these.

We are aware that officers representing you at the Police and Crime Panel on 6 February 2015 presented your plans for refreshing the Police and Crime Plan and the Panel has already responded

direct to you. We would like to highlight our particular support for the following points made by the Panel:

- Giving domestic abuse more distinct priority and prominence in the refresh.
- Making a clearer commitment to 'hidden crimes' including hate crime and crime committed in respect of other protected characteristics, and how the police will deliver equality and diversity in light of disbanding Equality and Diversity Teams.
- Considering reflecting in the budget to CSPs funding for actively seeking views of communities and not just reacting to them, along with a commitment to CSPs for administration in order to deliver against priorities in the Plan.

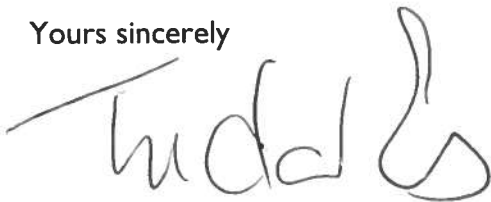
Finally, we believe that there are real opportunities for you to work more closely with existing partnerships in order to share your ideas and proposals, and combine effort for tackling the significant issue and impact of, for example, mental health. There are significant plans being worked up through our Integrated Commissioning Partnership looking at the range of complex issues and unmet needs affecting people in our communities such as mental health, homelessness, and substance misuse and would recommend you work in partnership with us on these developments.

We trust that you will find this feedback useful as you come closer to finalising your Police and Crime Plan refresh.

At our most recent Safer Plymouth Partnership Board meeting, it was agreed to send you the final draft of the Safer Plymouth Partnership Strategic Assessment, we are just in the process of finalising this and a copy will be sent to you under separate cover.

Please do not hesitate to contact us if you require any further clarification on the points above.

Yours sincerely



Cllr Tudor Evans  
**Leader of Plymouth City Council**



Tracey Lee  
**Chief Executive**

