Suffolk Police and Crime Commissioner

Making Suffolk a safer place to live, work, travel and invest

ORIGINATOR: CHIEF CONSTABLE	PAPER NO: AP21/06

SUBMITTED TO:	ACCOUNTABILITY AND PERFORMANCE PANEL – 15 JANUARY 2021

SUBJECT:	USE OF STOP SEARCH IN SUFFOLK – 1 OCTOBER 2019 TO 30 SEPTEMBER 2020

SUMMARY:

1. This report provides analysis of stop and search for the twelve-month period 1 October 2019 to 30 September 2020. There were 4,981 stops during the reporting period.

2. An assessment of the reason for search and the object of the stop show that the majority of stop and searches are associated with drugs. 3,469 (70%) of all stop searches have drugs as the reason for the search. 434 (9%) of stop searches were strip searches and of these, 415 (96%) were in relation to drugs. The second highest category is searching for weapons.

3. Over eight out of ten people stopped and searched reported that they understood the reasons for their search and were treated with respect and dignity by the officer(s).

4. As a county, there has been a general increase in the total number of stop searches conducted per quarter since Q2 of 2018/19, which is reflective of the Constabulary's approach to proactive policing in a sustained effort to identify and prevent potential crime and disorder. Positive outcomes from stop and searches remain high compared to other Forces.

RECOMMENDATION:

1. The Accountability and Performance Panel is asked to take account of the steps that the Constabulary is taking to ensure stop search legislation is used fairly and effectively.

1.   USE OF STOP/SEARCH IN SUFFOLK OCTOBER 2019 – SEPTEMBER 2020

1.1.   A database for recording 'stop and search' and 'stop and account' was implemented in Suffolk in December 2014, as directed by the Home Office. The rationale behind the database is to allow for greater governance of the use of stop and search powers, and allow for the identification of trends in the use of powers by individual officers, teams or stations. The database also allows for increased data collection on stop and search outcomes.

1.2.   The Home Secretary wrote to all forces in April 2014 following the findings of an HMIC inspection of how stop and search powers are used. Two main concerns raised were that:

a)   the HMIC found that fewer than half of police Forces in England and Wales complied with PACE 1984 requirements that arrangements are in place for stop and search records to be scrutinised by the communities they serve

b)   some forces set officer targets in relation to stop and search

1.3.   As a result, the Home Office and College of Policing introduced the 'Best Use of Stop and Search' scheme. Participating forces were asked to record the use of stop and search in more detail going forward in order to show the link (or otherwise) between the object of the search and the outcome. The scheme also introduced lay observation policies to enable members of the public to accompany officers on patrol and a 'community trigger' whereby police must explain to the public how powers are being used when there is a large volume of complaints.

1.4.   This report (and future reports) is based on data collected from the database. This report covers the period between 1 October 2019 and 30 September 2020 inclusive.

1.5.   A new recording system will be being used between now and then next report (Optik), and work is being undertaken to replicate the same information that is currently being reported on.

2.   OVERALL TRENDS[1]
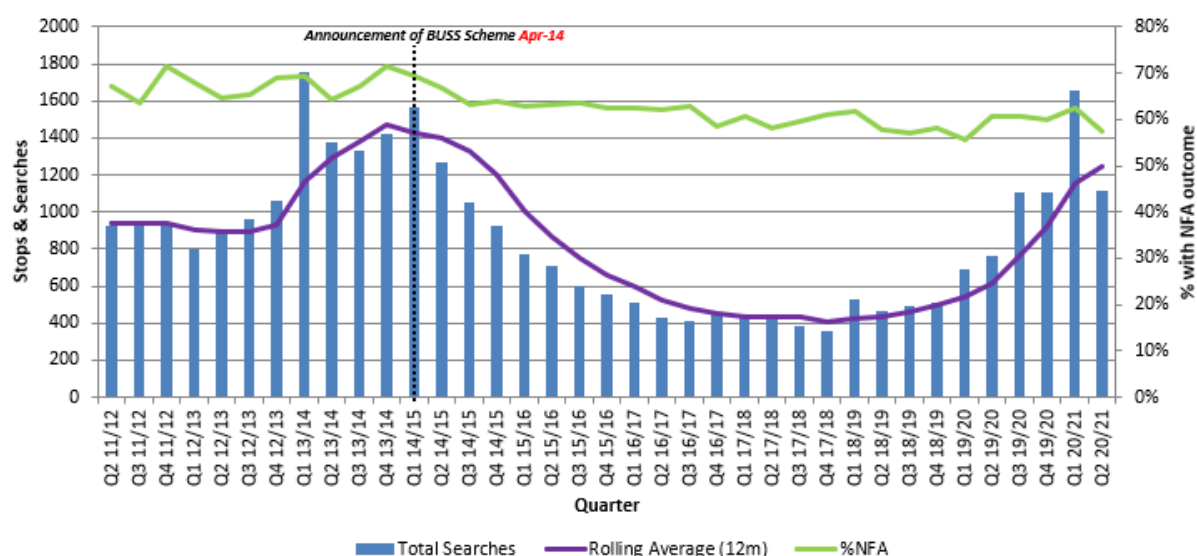
2.1.   **Use of stop and search**

Figure 1: Long-term trends in use of stop and search in Suffolk

---

[1] Rolling average based on a 12-month period

2.1.1. Figure 1 displays long term trends in stop and search over time, from Q2 2011/12 to Q2 2020/21. There was a consistent downward trend in stop and search since the announcement of the Best Use of Stop and Search (BUSS) scheme until Q4 2017/18. Since Q4 2017/18 there has been an upward trend, reaching a peak in Q1 2020/21 before decreasing in Q2 2020/21.

2.1.2. The peak in Q1 can likely be attributed to the impact of proactive policing at the start of Covid-19 lockdown.
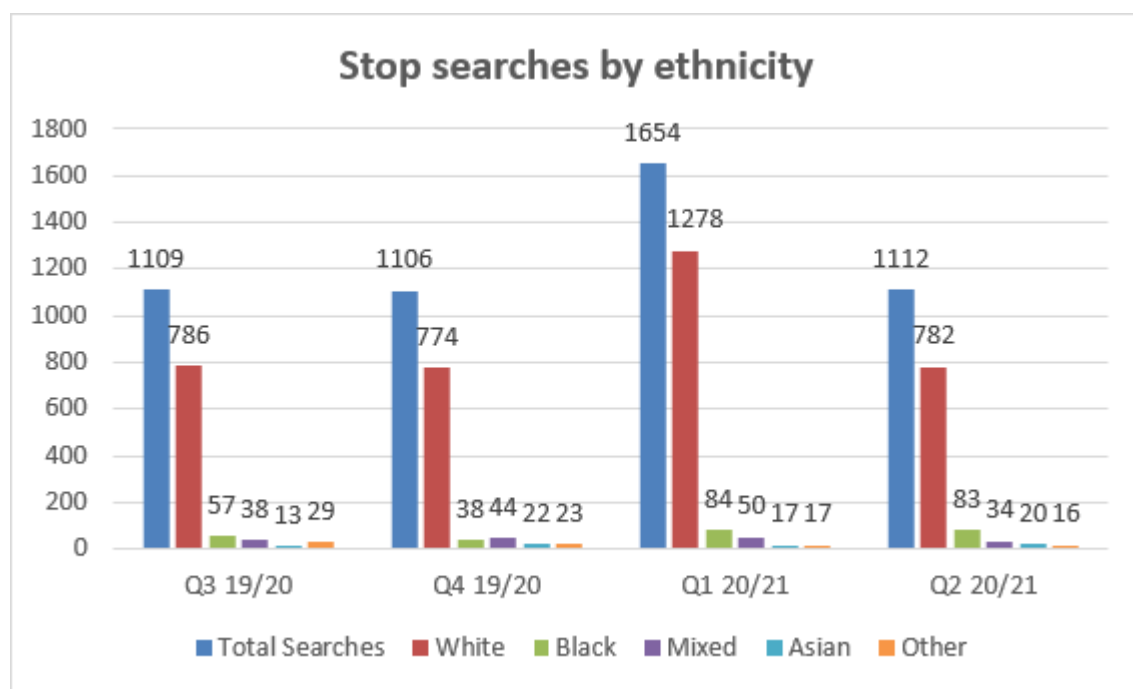

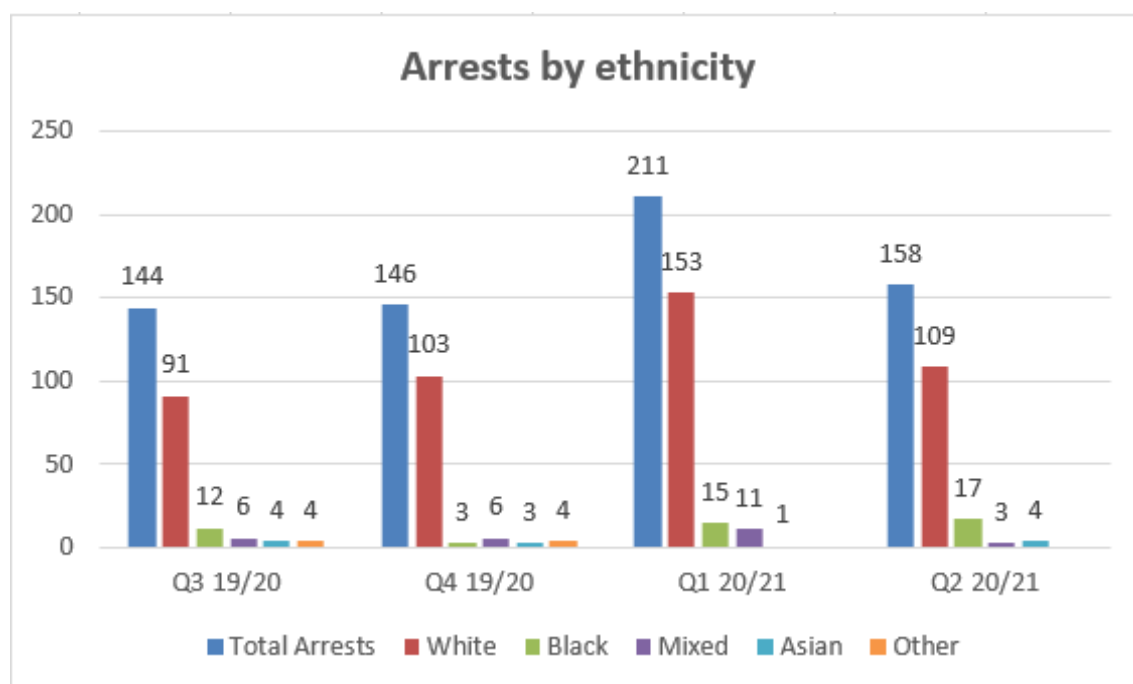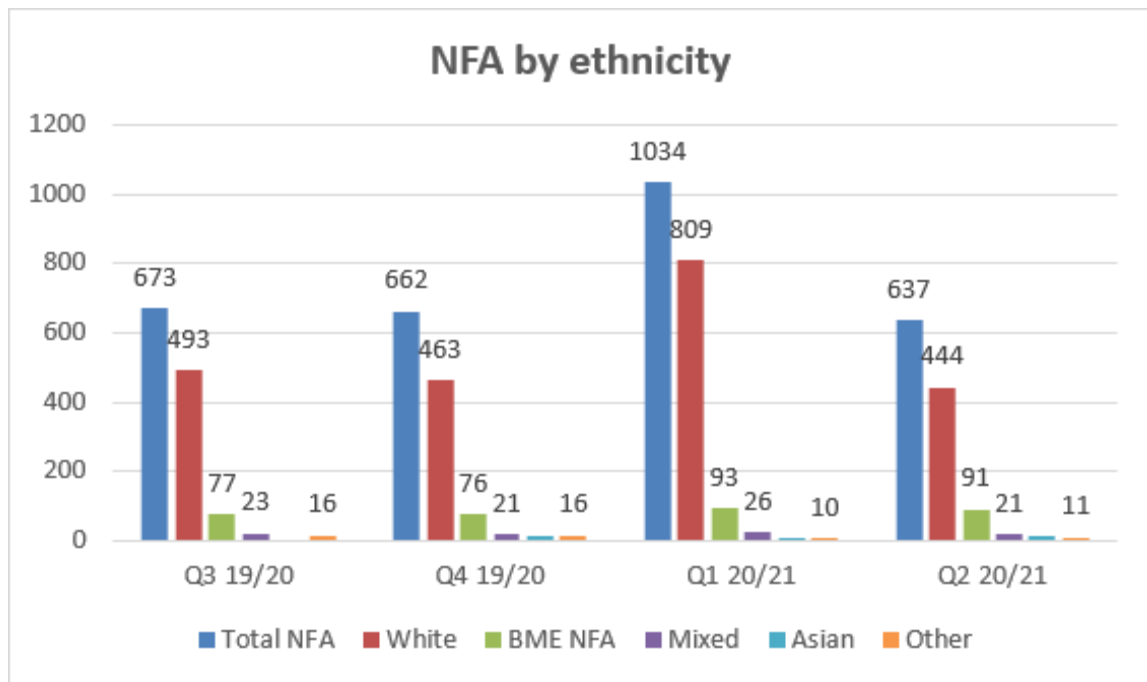*Figure 2: Stop searches by ethnicity*

Figure 4: Total NFA by ethnicity

2.1.3. The above three charts (figures 2, 3 & 4) show the stop and search trend data for the last 12 months, split by ethnicity. Please note that in some cases the ethnicity data does not add up to the total number of searches, arrest outcomes and no further action outcomes because on occasions the ethnicity is not stated within the data.

2.1.4. Figure 5 displays the trend in usage of stop and search in Suffolk since the beginning of the reporting period and reflects the general trend previously mentioned since the introduction of BUSS; there was a downward trend but there has been slight upward trend in volume over the last twelve months. In the year that BUSS was introduced there was an average of 400 stop and searches per month; this has now increased to an average of 461 per month in the last six months. During the last six months the number of stop and searches has fluctuated reaching a peak of 619 in May 2020.
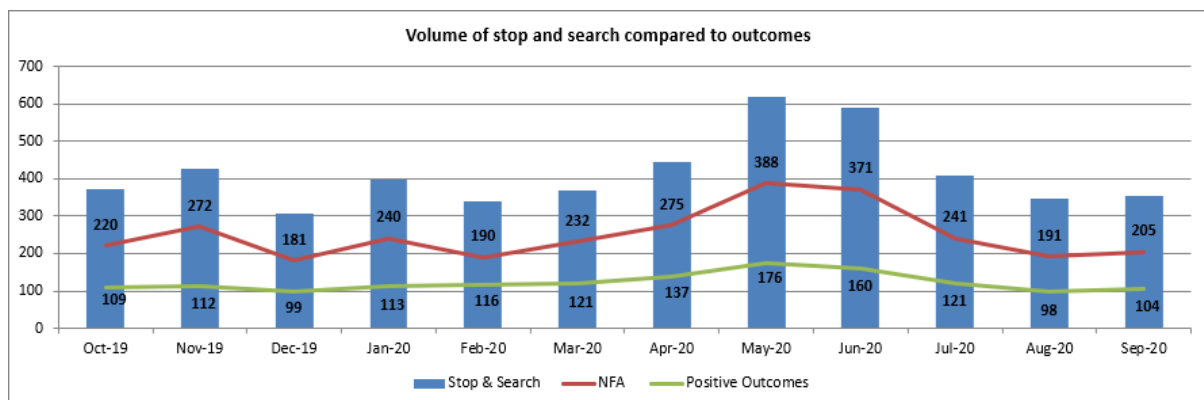

Figure 5: Volume of Stop and Search compared to outcomes October 2019 – September 2020

2.1.5. Between October 2019 and September 2020, the average rate of searches resulting in no further action taken (NFA) was 60%. In terms of quarterly statistics, there has been an almost continual decrease in NFA rate since the introduction of BUSS compared to moderate fluctuations prior to April 2014 (ranging between 63% in Q1 of 2011/12 and 71% in Q4 of 2013/2014). However, the NFA rate has remained the same since the last reporting quarter.
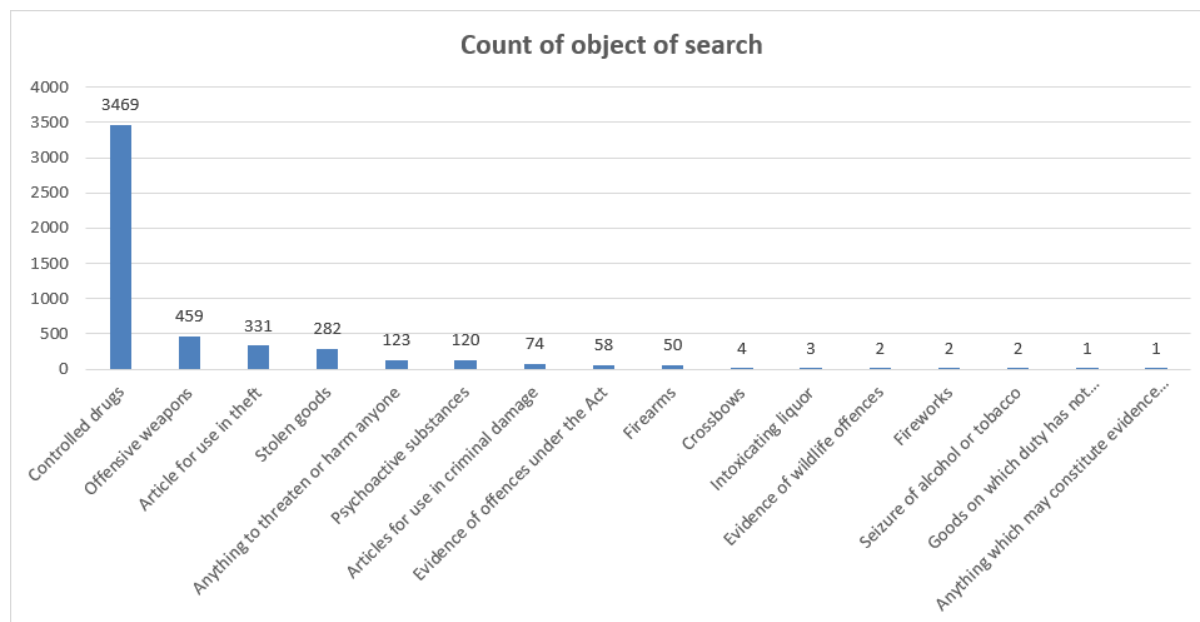
2.2. **Object of search**

Figure 6: Count of Object of Search

2.2.1. Figure 6 displays the object of stops and searches undertaken in Suffolk, during the reporting period. In the majority of stop searches (70%) controlled drugs has been recorded as the object of search. The highest volumes of these searches have taken place in two of the main centres of population in Suffolk – Ipswich and West Suffolk districts which is where police intelligence indicates that there is a higher prevalence of drug dealing and usage activity. Drugs related stop and searches in Ipswich accounted for 60% of the stop and searches where drugs were recorded as the object of the search, and in West Suffolk the percentage was 69%.

2.2.2 During the reporting period there were 3,469 (70%) of stop and searches where the object of search was drugs. Analysis of these drugs searches shows that, 1,724 (50%) were carried out against persons aged under 25 years old[2]. In terms of ethnicity, 423 (12%) of these searches were on those with a BME background, 2,564 (74%) on those of White ethnicity and 482 (14%) were on people for whom the ethnicity is not known/not stated.

2.3. **Use of strip search**

2.3.1. Between October 2019 and September 2020, there were 434 strip searches, accounting for 9% of all stop and searches which is the same as the last report (July 2020). Figure 7 displays the reasons for those strip searches, with 415 (96%) being drug related. Drug dealers are

---

[2] Public bodies, including public health, the NHS, local authorities and care providers, now widely recognise a young person as being anyone up to the age of 25 as opposed to age 18.

known to use various tactics to conceal drugs about their person, including the concealing of drugs in body cavities, hence the high prevalence of the use of strip searches in relation to drugs.
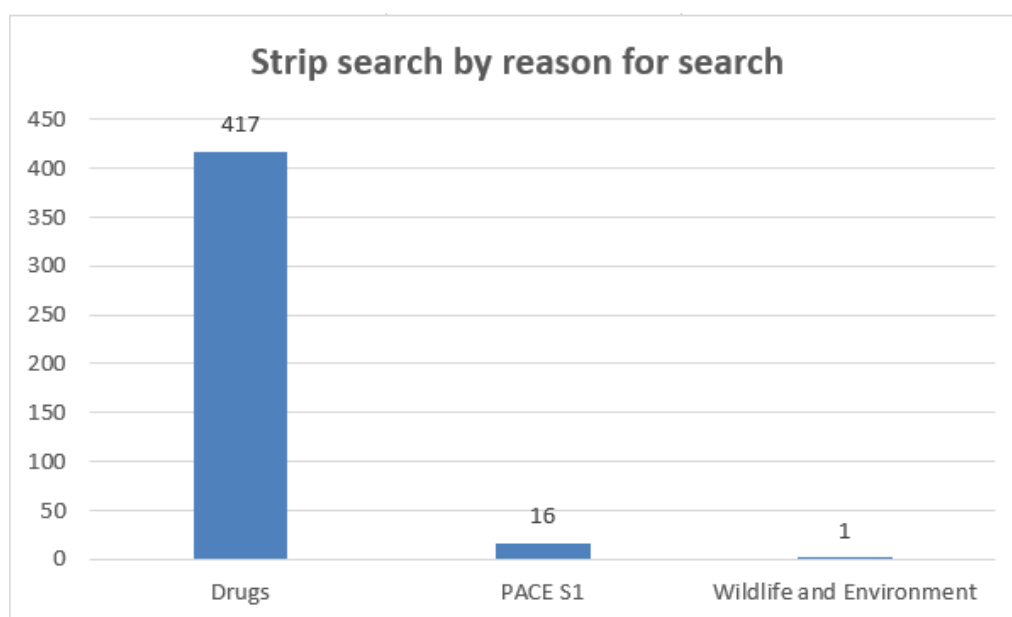

Figure 7: Suffolk strip search by reason for search

2.3.2   During the reporting period, 103 (24%) of all strip searches were undertaken on people of Black or Minority Ethnic (BME) background, which compares to 12% of all stop searches undertaken on individuals of BME background. 283 (65%) of all strip searches were undertaken on persons of White (British) ethnicity, with the remainder comprising of persons who have declined to define their ethnicity, or do not understand what is required. The item(s) being searched for is/are found in 120 (28%) of strip searches, whilst additional items not being searched for are found in 63 (15%) of strip searches. The rate of items searched for found has reduced by 1p.p. and items not searched for found have stayed the same since the last reporting period.

Table 1: Strip search by reason and ethnicity

Strip search type	Total count	Total %	White count	% White total	Black	% Black total
Drugs	417	96%	269	95%	67	98%
PACE S1	16	4%	13	5%	1	2%
Wildlife and Environment	1	0%	1	0%		0%
Grand Total	434	100%	283	100%	68	100%

Table 2: Strip search by reason and ethnicity continued

Strip search type	Mixed	% Mixed total	Asian	% Asian total	Other	% Other total	Not stated count	% Not stated total
Drugs	23	100%	7	100%	4	80%	47	98%
PACE S1		0%		0%	1	20%	1	2%
Wildlife and Environment		0%		0%		0%	0	0%
Grand Total	23	100%	7	100%	5	100%	48	100%

2.3.3.   The above table shows stop search by reason and ethnicity. The first two columns show the count and percentage of stop searches according to the reason for search. The following columns assess the count/percentage according to ethnicity for each of the reasons for stop search, and this part of the table should be read crossways. The majority of strip searches are conducted for drugs-related reasons for every ethnicity group.

2.3.4.   During the reporting period, the age category for which there were the most strip searches was 25 years and over, accounting for 56% of all strip searches irrespective of ethnicity. For

those with a White background it was also 25 years and over (61% of all white individuals undergoing strip search) and for BME subjects it was the 18-24 years age category (49% of all individuals undergoing strip search).

Table 3: Age breakdown and ethnicity of people who were the subject of a strip search

Age category	Count	% of total	White count	% age category	Black count	% age category
10 to 14	1	0%	0	0%	1	0%
15 to 17	47	11%	28	6%	7	2%
18 to 24	136	31%	77	18%	33	8%
Over 25	243	56%	174	40%	27	6%
Not stated	7	2%	4	1%	0	0%
Total	434	100%	283	65%	68	16%

Table 4: Age breakdown and ethnicity of people who were the subject of a strip search continued

Age category	Mixed count	% age category	Asian count	% age category	Other count	% of age category	Not stated count	% age category
10 to 14		0%	0	0%	0	0%	0	0%
15 to 17	5	1%	0	0%	1	0%	6	1%
18 to 24	11	3%	3	1%	3	1%	9	2%
Over 25	7	2%	4	1%	1	0%	30	7%
Not stated	0	0%	0	0%	0	0%	3	1%
Total	23	5%	7	2%	5	1%	48	11%

2.4. Stop and Search Outcomes

Table 3: Suffolk stop and search Outcomes

Outcome Type	Total count	% of all outcomes	White count	% of outcome type	Black count	% of outcome type
Nothing found – No further action	3006	61%	2209	61%	151	58%
Suspect arrested	659	13%	456	13%	47	18%
No Category	509	9%	320	9%	24	9%
Offender given drugs possession warning	291	6%	236	7%	16	6%
Article found - Detailed outcome unavailable	251	5%	194	5%	9	3%
Local resolution	105	2%	79	2%	7	3%
Suspect summonsed to court	73	2%	56	2%	5	2%
Offender cautioned	39	1%	32	1%	0	0%
Offender given penalty notice	32	1%	25	1%	2	1%
Suspected psychoactive substances seized – No further action	16	0%	13	0%	1	0%
Total	4981	100%	3620	100%	262	100%

Table 4: Suffolk stop and search Outcomes continued

Outcome Type	Mixed count	% of outcome type	Asian count	% of outcome type	Other count	% of outcome type
Nothing found – No further action	91	55%	42	58%	53	62%
Suspect arrested	26	16%	12	17%	8	9%
No Category	25	15%	4	6%	14	16%
Offender given drugs possession warning	9	5%	7	10%	2	2%
Article found - Detailed outcome unavailable	6	4%	4	6%	3	4%
Local resolution	3	2%	2	3%	0	0%
Suspect summonsed to court	2	1%	1	1%	2	2%
Offender cautioned	2	1%	0	0%	1	1%
Offender given penalty notice	1	1%	0	0%	2	2%
Suspected psychoactive substances seized – No further action	1	1%	0	0%	0	0%
Total	166	100%	72	100%	85	100%

2.4.1 The percentage of stop searches resulting in "Article found" have stayed the same since the last reporting period, at 5%. When assessing outcome types for subjects from a White background and those from a Black, Mixed, Asian and Other background collectively, (excluding not stated), the most common outcome for stop and search in Suffolk is 'No Further Action' (NFA), accounting for 61% of all outcomes[3], a 0.4p.p. increase when compared to the last reporting period (01/04/2019 to 31/03/2020). NFA reduced by over 2p.p. for Black, 5p.p. for Mixed, 0.8p.p. for Other. NFA rate increased in White ethnicity by 0.6% and Asian ethnicity by 12p.p., though it is worth noting this represents small numbers (a difference of 15 additional Stop searches of subjects from an Asian background resulting in NFA over the current 12 month reporting period).

---

[3] Where ethnicity is known ('not stated' ethnicities are removed from this figure). If 'not known' ethnicities are included, the average proportion of NFA outcomes drops to 60% for the county.

2.4.2 A further 9% of searches did not have an outcome recorded, as displayed in Table 3. This has increased by 0.6p.p. when compared to the last reporting period (01/04/2019 to 31/03/2020).

2.4.3 The proportions of stop and search where NFA is the recorded outcome varies from district to district, with the districts reporting the highest number of stop searches reporting a higher percentage of NFA outcomes (ranging from 57% in Babergh, to 62% in Ipswich).
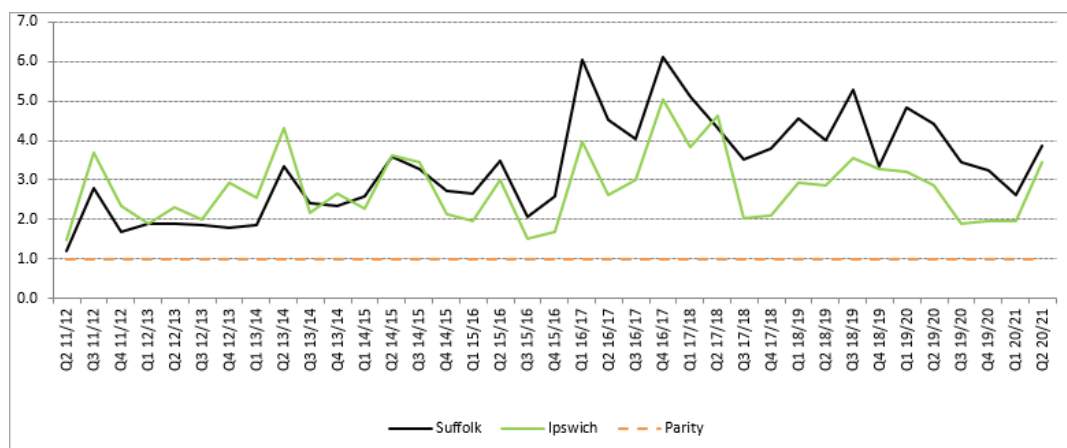
2.5 **Proportionality in the Use of Stop and Search**

Figure 8: Proportionality in the use of Stop and Search in Suffolk

2.5.1 Figure 8 displays the ethnicity proportionality of the use of stop and search for Suffolk as a whole and for Ipswich (where the use of stop and search is most prevalent). As a guide, if the proportionality figure is equal to one, it equates to parity – or that a BME person has had an equal likelihood of being subject to a stop and search as a White person. Where the figure is greater than one, BME people have been disproportionately subjected to the use of stop and search compared to White people[4].

2.5.2 In the last quarter, people whose ethnicity was categorised as BME were 3.9 times more likely to be stopped and searched than people of White ethnicity when assessing the County as a whole. The statistics for Ipswich show that those whose ethnicity was categorised as BME were 1.9 times more likely to be stopped and searched than people of White ethnicity.

Table 4: Suffolk Stop and Search by district, broken down by White/BME ethnicity

	Suffolk				Babergh				Ipswich				Mid Suffolk				West Suffolk				East Suffolk			
	Total	White	BME	% BME	Total	White	BME	% BME	Total	White	BME	% BME	Total	White	BME	% BME	Total	White	BME	% BME	Total	White	BME	% BME
Q3 2014/15	1053	862	138	13.1%	78	74	4	5.1%	291	189	81	27.8%	58	50	6	10.3%	315	283	24	7.6%	297	266	23	7.7%
Q4 2014/15	927	800	110	11.9%	112	101	10	8.9%	217	167	46	21.2%	82	80	2	2.4%	268	227	32	11.9%	248	225	20	8.1%
Q1 2015/16	776	667	89	11.5%	83	70	12	14.5%	190	148	36	18.9%	81	70	9	11.1%	255	219	28	11.0%	167	158	4	2.4%
Q2 2015/16	885	724	127	14.4%	85	75	8	9.4%	219	153	57	26.0%	66	55	5	7.6%	246	212	30	12.2%	269	229	27	10.0%
Q3 2015/16	744	653	68	9.1%	82	71	11	13.4%	145	117	22	15.2%	33	30	2	6.1%	234	207	23	9.8%	250	228	15	6.0%
Q4 2015/16	715	605	79	11.0%	43	36	4	9.3%	151	120	25	16.6%	47	42	3	6.4%	202	166	32	15.8%	272	241	15	5.5%
Q1 2016/17	524	391	119	22.7%	46	40	6	13.0%	173	107	61	35.3%	38	28	8	21.1%	153	117	32	20.9%	114	99	12	10.5%
Q2 2016/17	428	338	77	18.0%	32	29	3	9.4%	110	72	29	26.4%	24	22	2	8.3%	130	101	27	20.8%	132	114	16	12.1%
Q3 2016/17	408	320	65	15.9%	48	37	10	20.8%	98	67	25	25.5%	44	33	6	13.6%	131	111	13	9.9%	87	72	11	12.6%
Q4 2016/17	455	327	101	22.2%	37	28	7	18.9%	151	88	55	36.4%	44	43	1	2.3%	110	81	24	21.8%	113	87	14	12.4%
Q1 2017/18	443	333	86	19.4%	33	27	4	12.1%	135	86	41	30.4%	39	33	4	10.3%	164	124	31	18.9%	72	63	6	8.3%
Q2 2017/18	438	335	73	16.7%	38	34	4	10.5%	107	59	34	31.8%	63	57	3	4.8%	133	99	28	21.1%	97	86	4	4.1%
Q3 2017/18	383	310	55	14.4%	27	22	4	14.8%	99	75	19	19.2%	39	30	6	15.4%	119	93	20	16.8%	99	90	6	6.1%
Q4 2017/18	358	277	53	14.8%	19	16	1	5.3%	119	84	22	18.5%	36	34	2	5.6%	110	79	20	18.2%	74	64	8	10.8%
Q1 2018/19	526	391	90	17.1%	57	44	5	8.8%	159	107	39	24.5%	58	49	5	8.6%	151	118	20	13.2%	101	73	21	20.8%
Q2 2018/19	467	356	72	15.4%	33	28	3	9.1%	183	116	41	22.4%	37	28	6	16.2%	146	121	19	13.0%	68	63	3	4.4%
Q3 2018/19	491	344	92	18.7%	26	15	6	23.1%	213	131	58	27.2%	36	22	3	8.3%	131	104	16	12.2%	85	72	9	10.6%
Q4 2018/19	508	373	63	12.4%	45	39	2	4.4%	194	115	47	24.2%	22	17	1	4.5%	133	110	8	6.0%	114	92	5	4.4%
Q1 2019/20	694	469	114	16.4%	50	39	5	10.0%	316	178	71	22.5%	30	22	6	20.0%	163	120	21	12.9%	135	110	11	8.1%
Q2 2019/20	762	512	114	15.0%	35	30	2	5.7%	379	216	77	20.3%	23	18	1	4.3%	189	146	16	8.5%	136	102	18	13.2%
Q3 2019/20	1109	786	137	12.4%	68	53	6	8.8%	611	391	92	15.1%	39	30	3	7.7%	239	191	28	11.7%	152	121	8	5.3%
Q4 2019/20	1106	774	127	11.5%	81	69	3	3.7%	497	319	78	15.7%	55	34	4	7.3%	286	194	33	11.5%	187	158	9	4.8%
Q1 2020/21	1654	1278	168	10.2%	149	128	14	9.4%	488	317	77	15.8%	172	145	7	4.1%	481	382	46	9.6%	364	306	24	6.6%
Q2 2020/21	1112	782	153	13.8%	117	104	8	6.8%	481	269	115	23.9%	51	39	0	0.0%	251	198	21	8.4%	212	172	9	4.2%

---

[4] Based on the ethnic breakdown for Suffolk / Ipswich given in the latest census (2011) - ONS

2.5.3   As a county, there has been a general increase in the total number of stop searches conducted per quarter since Q2 of 2018/19, which is reflective of the Constabulary's approach to proactive policing in a sustained effort to identify and prevent potential crime and disorder. This has dropped slightly in the latest quarter.

2.5.4   The above table, provides some context to the county-wide picture, by displaying volumes of stop and searches over time in Suffolk at district level, broken down by White and BME stop and searches. The last 12 months of district data (quarter by quarter comparisons) shows that from a county perspective, the overall number of stop and searches has increased for White with every quarter until the latest quarter where there has been a decrease in volume of overall stop searches. Q1 of 2020/21 had the highest volume of overall searches and White searches. The number of BME stops remained relatively stable for the last two quarters of 2019/20 before increasing in Q1 2020/21 and deceasing slightly in Q2. BME stops accounted for 11.7% of stop and searches in this reporting period (Q3 2019/20, Q4 2019/20, Q1 2020/21, Q2 2020/21), which is a 1.6p.p decrease from 13.3% in previous reporting period (Q1 2019/20, Q2 2019/20, Q3 2019/20, Q4 2019/20). In terms of the individual districts, there has been a general trend of increasing numbers of people who are the subject of stop and search tactics when comparing this reporting period and the last reporting period. The district that has experienced the greatest increase in total number of stop and searches is South (Ipswich), where stop and searches have increased by 62.1% between the current reporting period and the last reporting period.

2.5.5   Furthermore, table 5 (below) displays stop and search over the same period, showing the percentage of all stop and searches on persons of BME ethnicity, along with the proportionality ratio. With reference to Table 5, the overall disproportionality value for Suffolk has increased over the last 12 months from 3.5 in Q3 2019/20 to 3.9 in Q2 2020/21.

Table 5: Proportionality of Suffolk Stop and Search by district

Quarter	Suffolk % BME	Prop.	Babergh % BME	Prop.	West Suffolk % BME	Prop.	Ipswich % BME	Prop.	Mid Suffolk % BME	Prop.	East Suffolk % BME	Prop.
Q1 2017/18	19.4%	5.1	12.1%	6.7	35.7%	6.7	30.4%	3.8	10.3%	5.6	0.0%	0.0
Q2 2017/18	16.7%	4.3	10.5%	5.3	18.9%	2.6	31.8%	4.6	4.8%	2.4	7.5%	2.4
Q3 2017/18	14.4%	3.5	14.8%	8.2	4.3%	0.6	19.2%	2.0	15.4%	9.2	5.0%	1.5
Q4 2017/18	14.8%	3.8	5.3%	2.8	21.4%	3.9	18.5%	2.1	5.6%	2.7	7.7%	2.3
Q1 2018/19	17.1%	4.6	8.8%	5.1	5.9%	0.7	24.5%	2.9	8.6%	4.7	23.0%	8.8
Q2 2018/19	15.4%	4.0	9.1%	4.9	18.5%	2.7	22.4%	2.8	16.2%	9.8	4.8%	1.4
Q3 2018/19	18.7%	5.3	23.1%	18.1	12.2%	2.7	27.2%	3.6	8.3%	6.3	10.6%	4.2
Q4 2018/19	12.4%	3.4	4.4%	2.3	6.0%	1.3	24.2%	3.3	4.5%	2.7	4.4%	1.8
Q1 2019/20	16.5%	4.8	10.0%	5.8	12.9%	3.1	22.5%	3.2	20.0%	12.5	8.4%	3.3
Q2 2019/20	15.4%	4.6	5.9%	3.1	8.5%	1.9	20.5%	2.9	4.3%	2.5	14.3%	6.4
Q3 2019/20	14.8%	3.5	10.2%	5.1	12.8%	2.6	19.0%	1.9	9.1%	4.6	6.2%	2.2
Q4 2019/20	14.1%	3.3	4.2%	2.0	14.5%	3.0	19.6%	2.0	10.5%	5.4	5.4%	1.9
Q1 2020/21	11.6%	2.6	9.9%	5.0	10.7%	2.1	19.5%	2.0	4.6%	2.2	7.3%	2.6
Q2 2020/21	16.4%	3.9	7.1%	3.5	9.6%	1.9	29.9%	3.4	0.0%	0.0	5.0%	1.7

2.5.6   A potential limitation of using census population data on which to base proportionality calculations is that not all persons that are subject of stop and search in Suffolk will be resident in the county. Between October 2019 and September 2020 there was a total of 4,981 stop and searches – 3,721 were on Suffolk residents, 511 on individuals who are resident outside Suffolk and 749 where the address was not stated. Therefore, a further analysis was undertaken at a county level, looking at disproportionality of stops and searches only where the postal address of the subject is identified as within Suffolk, displayed in table 6.

Table 6: Suffolk stop and search broken down by postal address

Address	Total	White	BME	Not stated	BME as percentage of total	Proportionality
Postal address in Suffolk	3721	2810	403	508	10.8%	2.84
Postal address outside of Suffolk	511	349	120	42	23.5%	6.82
Postal address not given	749	461	62	226	8.3%	2.67

2.5.7   Table 6 demonstrates the effect that stop and searches, on persons who are resident outside Suffolk, has on overall figures. For the reasons stated in 2.5.5, it is argued this is a more balanced way of looking at proportionality of stop and searches in Suffolk, if using the demographic profile of Suffolk residents as a basis for judging proportionality. The use of stop and search remains disproportionate when looking at this sub-sample, but not as disproportionate.

Table 7: South Suffolk (Ipswich) stop and search broken down by postal address

Address	Total	White	BME	Not stated	BME as percentage of total	Proportionality
Postal address in Suffolk	1572	1017	273	282	17.4%	2.15
Postal address outside of Suffolk	119	65	45	9	37.8%	5.55
Postal address not given	386	214	44	128	11.4%	1.65

2.5.8   As in Table 6, the data in Table 7 demonstrates the effect that stop and searches, on persons who are resident outside Suffolk, has on overall figures. Table 7 is an assessment of stop and searches in South Suffolk (Ipswich). In line with County statistics, the use of stop and search remains disproportionate when analysing this sub-sample, but not as disproportionate.

2.6   Community Satisfaction/Quality of Service

Table 8: Responses to the question: Did you understand the reason for being searched?

Response	Total	Male	Female	Other	Asian	Black	Mixed	White	Other
No	17%	17%	14%	71%	13%	14%	11%	14%	12%
Yes	83%	83%	86%	29%	88%	86%	89%	86%	88%

2.6.1   Table 8 displays the responses to the question 'Did you understand the reason for being searched?' As the table shows, the majority of respondents did understand the reason for the search (83%) with 17% of respondents indicating that they did not understand why they were searched.

Table 9: Responses to the question: Did you feel you were treated professionally, respectfully and with dignity?

Response	Total	Male	Female	Other	Asian	Black	Mixed	White	Other
No	19%	19%	16%	71%	15%	18%	14%	15%	14%
Yes	81%	81%	84%	29%	85%	82%	86%	85%	86%

2.6.2   Table 9 displays responses to the question 'Did you feel you were treated professionally, respectfully and with dignity?' Responses are similar to the previous question, with 81% of respondents answering that they did and 19% saying they did not.

2.6.3   In terms of public satisfaction, it can be seen that eight out of ten stop search subjects were satisfied with the way in which they were treated by officers.

3.   THE FOLLOWIMG INFORMATION HAS BEEN PROVIDED BY ISCRE ON THEIR WORK TO ADMINISTER THE STOP AND SEARCH REFERENCE GROUP (SSRG)

Reporting Period: June to December 2020

3.1   The aim of the Stop and Search Reference Group to build trust and equity in the way Suffolk Police use Stop and Search powers. The group provides people from BAME communities and others with a safe space and a neutral platform to share their experiences whilst challenging unfairness in order to reduce disproportionality in the use of the policing tool.

3.2   During the pandemic, we have been having SSRG meetings online. We have seen a marked increase in attendance by members of the public and the police representatives.

3.3   Online meetings were held on 12 August and 28 October 2020 was attended by a total of 48 people from across the county, including police representatives.

3.4   For the 12 August 2020 meeting, we received a total of 1532 stop and search forms, and out of that we selected the following, to audit:

• BAME: 52 from 158
• White British: 103 from 1034
• White Other: 51 from 156
• Not Stated – 61 from 1184

3.5   For the 28 October 2020 meeting, we received a total of 698 stop and search forms, and out of that we selected the following, to audit:

• BAME: 29 from 87
• White British: 44 from 435
• White Other: 22 from 67
• Not Stated – 36 from 109

Main issues

3.6   Community members pointed out that they are generally supportive of the use of stop and search when it is used fairly in an intelligence-led and less opportunistic way.

3.7   Concern was expressed about continued failure by some officers to clearly articulate the reasonable grounds for suspicion on the face of the forms. The meeting also pointed out that some supervisors were failing to pick up these concerns when signing off forms.

3.8   With most of the stops and searches conducted for possession of cannabis, the community is concerned about the prioritisation of limited resources given that concerns have been raised by the public on the police's failure to attend high level crime on time. The use of previous convictions as sole grounds for stop searches was also criticised.

3.9   There seems to be an increase in the use of handcuffs against young people from BAME backgrounds and police were urged to investigate why this is happening.

3.10   The continued increase in the use of stop and search during the lockdown was highlighted as concerning, especially when it has been highlighted that BAME people are more likely to be out and about due to their over-representation in frontline jobs and their less likely to work from home.

3.11   Generally, the quality of the forms has improved and the police were commended for this.

3.12   Next year we hope to use a combination of physical and online meetings.

Body Worn Video

3.13   Due to social distancing regulations, we have not been able to review body worn video but arrangements are in place to do so once the guidance allows.

3.14 The lockdown appears to have caused an increase of neighbour disputes and racial abuse. This has led to an increase in complaints from members of the BAME community on perceived mishandling of cases. We continue to work closely with the professional standards departments in Suffolk and Norfolk, with some cases being referred to IOPC.

3.15 We have supported people on complaints involving allegations of racial profiling, excessive use of force, concerns around slow progress of investigations and serious racially aggravated assault by an officer.

Dates for 2021 SSRG meetings:

27 January 201
31 March 2021
26 May 2021
28 July 2021
29 September 2021
24 November 2021

4. OPERATIONAL ACTIVITY

4.1 The following section outlines some of the operational context within which the stop and search tactic has been used in Suffolk this year.

4.2. East Suffolk

4.2.1. Proactivity within the CPC Eastern Area continues to be driven by the Scorpion (East) and the Sentinel (east) teams, with both working in partnership to support the local SNTs within the Lowestoft and Halesworth localities, to address local crime and ASB priorities.

4.2.2 The further addition of the newly formed "Kestrel" (CPC neighbourhood crime priority team) and Serious Crime Disruption (East/Test) teams, both of which are resources available for deployment within the East, will see even greater opportunity for intelligence led, proactive policing interventions.

4.2.3 The local intelligence picture in relation to County Lines remains very positive across the East. Whilst there have been attempts by county lines to gain a foothold in towns such as Lowestoft and Leiston, at this time only one confirmed County Line is believed to be connected to the east and activity is sporadic. However, where activity has been identified, proactive policing interventions, in some instances working in partnership with the Metropolitan Police (Op ORACHI) have seen these "businesses" subject to significant disruption and enforcement.

4.2.4 With an absence of County Lines, officers have concentrated efforts on "local" Class A drug suppliers, again with significant success in addressing the associated crime and ASB issues associated with their operating within the local communities.

4.2.5 The effective use of Intelligence led Stop and Search powers have been an integral part of the successful deployments within the eastern Area, with particular examples of this including:

- May 2020: vehicle was stopped in the Lowestoft area. With the officers acting on intelligence relating to the driver, he was searched, in accordance with S23 Misuse of Drugs Act. 21 small bags of Cannabis were located in the vehicle's locked central console and the

driver was arrested on suspicion of possession with intent to supply. He provided false details in custody however once his correct details were ascertained and his home address searched a further £1500 of cannabis was located. The male was released under investigation and awaits trial. However, as part of this investigation, forensics linked another suspect who was arrested in November 2020, with approx. £50,000 worth of cannabis recovered from his address. This second male has received a 2-year prison sentence. After some false address' given in custody, the suspects correct address was searched with £1500 of cannabis found hidden in a kitchen cupboard. The suspect was released under investigation and CPS advice on this case is awaited. Forensic evidence on the large amount of cannabis gave another suspect and this other suspect was arrested in November 2020, with £50,000 of cannabis located at his address, he was subsequently imprisoned for 2 years.

- June 2020: Vehicle stopped due to intelligence suggesting the driver did not have the correct documentation. Other occupants within the vehicle led the officers to become suspicious which led to grounds to conduct a search of the vehicle. Approx. £3500 worth of Class A drugs were discovered was located under the driver's seat. The suspects were arrested and a CPS decision is awaited.

- June 2020: A stationery vehicle was approached by a male on a motorcycle. Officers witnessed a bag thrown by motorcyclist into occupant of vehicle. Vehicle driver and passenger identified by officers as connected to intelligence relating to drug supply. Vehicle stopped and a bag was seen on the rear seat of the vehicle. Search of the bag revealed £4000 worth of cannabis Both occupants were arrested and a further involved party was arrested a month later. All released under investigation and forensics are awaited before the matter goes to the CPS.

- June 2020: Vehicle shown with intelligence linked to drug supply (Class A) stopped. Driver initially questioned about documentation (incorrect docs). Due to information revealed during stop both occupants of vehicle arrested for being concerned in the supply of drugs. Subsequent enquiries conducted by officers revealed the males were involved in a significant Cannabis grow with 3 others who were then also arrested. All 5 now remain under investigation pending CPS advice.

- October 2020 - vehicle stopped in Lowestoft. Driver spoken to and initially unable to provide satisfactory account for his presence in the area. Officers spot screwdrivers seen in the footwell of vehicle so conduct Stop/Search of vehicle., Large quantity of what were believed to be illegal / counterfeit cigarettes located. Male arrested and following subsequent enquiries a further 2 suspects were arrested at linked address. Over £4000 in cash seized as well as counterfeit cigarettes with an estimated street value of £20,000.

- October 2020- Intelligence relating to an offender who poses a significant public risk led to the male being spotted and stopped by officers. A police-type baton and knife were found on the male. Male also driving above the prescribed limit. Forensics awaited re: drink drive aspect before proceeding for charge.

- October 2020 - Vehicle stopped in Lowestoft with 4 occupants. All occupants from Norwich area. Unsatisfactory reason provided for presence in area and intelligence linked 3 of the 4 occupants with sale/supply Class A drugs in Norwich. All vehicle occupants searched and one was found in possession of a large kitchen knife concealed in his trousers. Further intelligence revealed sufficient to arrest this male for being concerned in the supply of Class A drugs. Matter to go to the CPS for charge decision imminently once all telephony work concluded.

4.3.   West Suffolk

4.3.1   Stop and Search has been, and continues to be, an essential tactic in supporting local commanders to achieve the Force Plan. Its use can be seen across local policing areas, within numerous commissioned operations and in response to trending threats. During the last 12 months, it has been effectively used to combat county lines, offensive weapons, knife crime, burglaries and theft.

4.3.2   Use of Stop and Search continues to be monitored at the West Daily Management Meeting, Weekly & Monthly Performance Meetings and through Operation Velocity (specifically targeting County Lines). The West uses bespoke products to allow commanders to monitor monthly outcome rates (the volume of positive stop / searches) and identify the impact of local operations. This facilitates strong oversight at a local level, allowing commanders to respond quickly to use of the tactic, whilst ensuring its legitimacy as a policing tool and remaining accountable to our communities.

4.3.3   Performance targets relating to the volume of searches are not set within the Western Area. Instead, each locality is monitored against the Force outcome rate and a target of 25% positive outcome rate is strived for. This represents a 1 in 4 successful searches, compared to the average of 1 in 10 in previous years. There is a strong emphasis on intelligence led searches as this has demonstrated the greatest impact on positive outcome rates. Over the last 12 months use of the tactic in the area has averaged 153 searches per month, with a peak of 300 searches during May and June, attributed to the impact of lock-down on officer demand and increased pro-activity. Summer 2020 saw a significant increase in use of the tactic, before a decline to average levels.

4.3.4   Covid-19 has had a noticeable impact on increased use of the tactic over the preceding period. There is a clear correlation between the initial national restrictions and increased use. It is understood that a reduction in general demand led to increased pro-activity, combined with the overlap between criminality and coronavirus regulation breaches. Despite the increase in the volume of searches, the area has continued to maintain an outcome rate of 26% for the period, above the force outcome rate of 24%. Bury St Edmunds retains the highest outcome rate in the area of over 28% for this period. Bury St Edmunds has seen consistent improvement over the last 12 months, resulting in the locality achieving an outcome rate of over 40% in the last quarter. The outcome rate for the area suggests that whilst use of the tactic has seen an average increase year on year, and a significantly high peak, its use remains consistent with other periods. This indicates that increased use has not led to diluted grounds or judgement by officers.

4.3.5   Overall, the positive outcome rate provides a strong indication that stop search is mainly intelligence based, the West has an effective briefing system providing focus for local staff and there are good links between the Western Area intelligence unit. Local officers are using the power so that officers are utilising their time effectively and there is good officer awareness of local priority crime series.

4.3.6   Operational Examples:

-    Proactive patrols in Bury St Edmunds by plain clothes' officers, targeting drugs activity in a specified area, led to a disrupted drug deal and the pursuit of two subjects who left the area. The males were later located, acting suspiciously, and following an encounter was searched. Officers found Class A Drugs, cash and a burner phone, leading to the arrest of the individual and a Modern-Day Slavery referral.

- Officers conducting intelligence led patrols encountered a male who attempted to evade police in Stowmarket. The officers searched the subject and recovered a nine-inch combat knife, a significant amount of money and Class B Drugs.

- In Sudbury officers on mobile patrol have encountered the sole occupant of a vehicle, registered to an address out of county. The vehicle had intelligence linking it to county lines and suspicious activity. Following an encounter with the subject, they were searched. Class A Drugs were recovered, as was a significant quantity of drugs leading to arrest and prosecution.

- Officers in Bury St Edmunds encountered a male acting suspiciously, on encountering the male he provided inconsistent details and was evasive. The subject was searched, and a large ten-inch knife was recovered on his person. The subject was charged and later found to be wanted for similar offences.

- Following reports in Sudbury of a male being seen in possession of a large knife, officers have attended and engaged the subject. Due to his behaviour and intoxication, officers had to draw their tasers. On complying with officers, the subject was found to be in possession of a large knife and was arrested.

- Officers on patrol in Forest Heath identified a male acting furtively, on engagement by officers he has become evasive and run away. Officers have pursued and on taking hold of the male, he has tried to escape a number of times. Once secure the male was found to be in possession of Class A Drugs, a large amount of cash, scales and a mobile phone. Following arrest, a property was searched, recovering a significant amount of Class A drugs and cash.

4.4. South Suffolk

4.4.1 The effective and legitimate use of stop and search continues to be actively used within the Southern Area's high crime areas. Use is monitored via the Area's monthly performance meeting and feedback from the Stop and Search Accountability forum is cascaded to Inspectors and Sergeants to brief Officers. Supervisors have been encouraged to take part in the Stop and Search reference group. Officers are being encouraged to 'Stop, Engage, Explain and Search':

- To engage with people and talk to them particularly within our high crime areas related to knife crime, robbery and drugs;
- To make effective use of stop and search powers where appropriate and focus on improving our outcomes;
- To ensure that rationale /grounds for Stop & Search are accurately recorded / described.

4.4.2 Due to a sharp rise in weapons finds and drug related violence within the Maple Park area and surround streets in September and the early part of October, the Area saw dedicated patrols predominantly during the Late evening. Intelligence and information were reviewed daily and a dedicated team of officers were placed on foot patrol in the identified areas.

4.4.3 The dedicated team has continued through this period tackling issues being raised by local residents and businesses in respect of community confidence, visibility, prolific offenders, ASB and crime in the centre of Ipswich.

4.4.4 In October the team worked alongside BTP and ERSOU at Ipswich railway Station (Operation Viking). Over the two days of enforcement a total of 432 wraps of Class A drugs were seized, a quantity of Cannabis and the all-important burner phones for the County Lines businesses. 3 arrests (one wanted on warrant) and 2 Child Sexual Exploitation safeguarding referrals were also made.

4.4.5   `To date, over 150 arrests for offences such as robbery, burglary, Modern Day Slavery Offences, possession of drugs affray, theft from motor vehicles, theft from the person and fraud, among other offences have been made.

4.4.6   Operation Sceptre is a national week of action to tackle knife crime and was run in November 2020. The operation includes a number of tactics which forces can utilise, choosing those that best fit the local crime profile and needs. Nine arrests were made as part of the week of action linked to Knife Crime. The operation used intelligence-led deployments as part of the ongoing work with partners to tackle knife-based criminality and associated gang activity. As well as the arrests officers also conducted 53 visits to properties (some more than once) that were known to police to have links to County Lines, weapon offences and 'cuckooing'. No offences were apparent in these visits, although appropriate welfare and support was provided where necessary to some individuals

4.4.7   Other activity during the week included intelligence led stop & searches, high visibility patrols including at Ipswich and Bury St Edmunds train stations and three weapons sweeps in Ipswich parks. Schools Liaison Officers and Community Engagement Officers also supported schools delivering information on knife crime, County Lines and gangs to children and teachers in schools. This included assemblies and classroom talks with officers encouraging honest conversations around knife crime and to highlight to children the dangers of carrying knives, as well officers distributing literature and posters.

4.4.8   Over 3,400 knives and bladed items were also recovered from the knife surrender amnesty bins across the county where people can dispose knives and blades safely. Three knife bins are located in Ipswich (outside the Fire Station, Queen's Way and Bramford Road) and at police stations in Lowestoft, Bury St Edmunds, Mildenhall, Sudbury and Haverhill and in Stowmarket at the junction of Strickland's Road and Ipswich Street. The high value of knives/bladed items in the bins is predominantly due to the fact of Covid-19 and the fact they were not emptied in spring and it has been 12 months since they were last emptied.

4.4.9   Despite the constraints of operating under Covid-19 restrictions we continued to target those involved in County Lines, carry out positive work with the community, residents and the engagement with schools. We were warmly received in schools and there were some really searching and intelligent questions from the children on the topic of knife crime and gangs.

4.4.10   The South have a dedicated Youth Engagement Team (formally referred to as the Gang's Team). They work with individuals aged 10 to 17 years to pro-actively engage them and focus on prevention and early intervention to deter continued association with gangs, violence or crime.

YET Examples of work:

-    The KickOff@3 event planned for Saturday 25th April 2020 had to be postponed due to Covid-19 restrictions. However, in partnership with Suffolk Football Association, National KickOff@3 team, Suffolk Ethnic Police Association, YMCA Trinity Trust, Positive Futures, Local Authority partners and business partners a funding application was submitted to the Police and Crime Commissioner's Fund to enable the creation of police youth football league with weekly matches for girls on one evening and boys on another (age range 13-16 years as per national KickOff@3). This would take place on the run up to a KickOff@3 tournament (Covid-19 permitting) in April 2021. The application is much wider than football, there would be a referee and coaching development programme running alongside the weekly league with a view to developing as many young people as possible. Building life

skills and increasing employment opportunities. There would also be opportunities for young people to be involved in the committee, event management, photography, social media, and a range of other linked opportunities. As per the national KickOff@3 the intention is to invite educational establishments and business partners to attend and provide inputs/attendance at the weekly league and at the event itself to help young people identify future employment and educational opportunities. Ex Premiership referee Roger East is a national KickOff@3 ambassador and he has offered to support a Suffolk police youth league. The bid was successful.

- The Youth engagement Team were able to support 'SpinOf@3' over the summer months. SpinOff@3 is a national initiative linked to KickOff@3 and it involves encouraging young people to keep active during the restrictions by undertaking cycling (when restrictions permitted). This involves mountain biking at 'Twisted Oaks' site in Brightwell. The team have been working with a cohort of vulnerable young people on a weekly basis to help build their confidence, help to keep them active and enable partners and Youth Engagement Team Officers to undertake bespoke diversionary work with these young people. Very positive feedback was received from a parent of a YP who has been taking part and a Youth Justice Practitioner

- **Young Person A**

YP frequently involved in criminality during the first three months of the year. Level of involvement ranged from drugs, criminal damage and thefts. Early engagement identified YP being exploited due to learning difficulties and a disjointed upbringing. YP required stability and a mentor. YP taken to a local park run, involved in making breakfast and given an honest realistic oversight of where choices were taking YP.

From building this trust and relationship with YP the YET supported YP to be enrolled at St. Johns Ambulance as an adult volunteer for the Covid-19 pandemic. YPs aspirations are to become a paramedic YET continue to engage with YP.

Between January and March YP had 20 Crimes/PVP on Athena as a suspect or involved party. During the month of April YP has had 0 Crimes/PVP recorded. During the same 3-month period YP had also been reported missing 25 times. In April this number was reduced to 0.

- **Young Person B**

YP came to notice as he was using his vehicle to pick up vulnerable young girls at two of the YMCA centres with concerns of CSE, drugs and alcohol use. Initially Covid-19 verbal warnings given and engagement with the YMCA staff to reduce the incidences. YP was then issued a Community Protection Notice warning due to his persistent behaviour. Reports reduced from initially 8 in two weeks to 1 following YET intervention. YET continue to monitor YPs behaviour and are now exploring whether the case is suitable to seek a Slavery and Trafficking Risk Order.

- **Young Person C**

YP between January and February YP was involved in 29 criminal investigations and was referred to the YET. Since they have started to work with there has been a reduction to just 3 investigations.

4.4.11 There have been a number of positive stop searches. Below are examples:

- July 2020 Arrested for Money Laundering

Vehicle stopped section 163 Road Traffic Act to check driver details and documents. Driver with recent information that he is involved in vehicle fraud. Passenger with previous for fraud and seen to have a very large bundle of bank notes in wallet. S.1 pace search for items relating to fraud. Found in possession of Large amount of Cash.

- September 2020 Arrested for Possession of a Bladed Article and Class A Drugs
  A Male was observed in the Alley beside Handford Primary School looking through the fence. He was heavily intoxicated. He was stopped and detained for S23 search, lockable Stanley knife and Packet of suspected class A drugs found on him.

- October 2020 Arrested for Possession of Offensive weapon & Article for use in fraud
  Vehicle stopped section 163 Road Traffic Act to check driver details and documents. Recent information that both occupants involved in thefts and burglaries. Detained S.1 PACE search for items used to steal with and also stolen items.

4.5   Operation Velocity

4.5.1   Operation Velocity is an initiative focussing on all drugs use/supply in Suffolk. During the reporting period, 119 stop and searches have been flagged as being linked to these operations with South (Ipswich) reporting 68 and West Suffolk reporting 43 equating to 93% of the overall stop and searches attributed to Operation Velocity. In Ipswich there were 41 stops on subjects from a White background and 24 stops on those from a BME background, compared to West Suffolk where 38 stops were on those from a White background compared to three from a BME background.

4.5.2.   The countywide statistics are shown in the table below:-

Table 10: Countywide comparisons for Operation Velocity.

District	Total	White	Black	Mixed	Asian	Other	Strip searches	NFA outcome	Suffolk resident	Non-Suffolk resident
Babergh	6 (5%)	5 (4%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	1 (1%)	4 (3%)	5 (4%)	0 (0%)
Ipswich	68 (55%)	46 (37%)	10 (8%)	4 (3%)	2 (2%)	2 (2%)	10 (8%)	41 (33%)	47 (38%)	8 (7%)
Mid Suffolk	4 (3%)	3 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	3 (2%)	2 (2%)	2 (2%)	0 (0%)
East Suffolk	4 (3%)	4 (3%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	4 (3%)	4 (3%)	0 (0%)
West Suffolk	41 (33%)	32 (26%)	2 (2%)	3 (2%)	0 (0%)	2 (2%)	5 (4%)	31 (25%)	29 (24%)	4 (3%)
Total	123 (100%)	90 (73%)	13 (11%)	7 (6%)	2 (2%)	4 (4%)	19	82 (67%)	87 (71%)	12 (10%)

4.5.3.   In respect of postal addresses given by persons stopped in relation to Operation Velocity, 87 (71%) were Suffolk addresses, 12 (10%) were addresses outside Suffolk and the address had not been stated in 24 (20%) of cases.

4.5.4.   The NFA rate for Operation Velocity is 67%.

4.5.5.   According to the County Lines Disruptions Log, the following statistics have been recorded between October 2019 and September 2020:

Area	No disruptions	Quantity of drugs seized	Cash seized
East	7	Not specified	Not specified
South	79	Approx 1130 wraps & 1450 grams, predominantly class A	Approx £19,000
West	71	Approx 1485 wraps & 65 grams, predominantly class A	Approx £13,500

5. NATIONAL COMPARISON

5.1   The latest national stop search data was published to March 2020[5]. In the year ending March 2020 there were 558,973 stops and searches conducted by police in England and Wales including the British Transport Police under section 1 of PACE, an increase of 52.3% compared with the previous year. For the same period of time in Suffolk (April 2019 to March 2020) the number of stops increased from 1,891 to 3,426 (81.2%) in Suffolk.

5.2   The latest national data are for the financial year 2019/20. This data shows that Suffolk conducted up to five stops per 1,000 of population compared to three stops per 1,000 of population in the previous financial year. In England and Wales there were ten searches per 1,000 population in the year ending March 2020.

5.3   In the year ending 31st March 2020, those who considered themselves to be from BME groups (Black, Mixed Race, Asian and Minority Ethnic) were just over four times as likely to be stopped as those who considered themselves to be White. The difference between the two groups narrowed to twice as likely between the years ending March 2013 and 2015, rising to 3 times as likely in the year ending March 2016 and rising again to 4 times as likely in the year ending March 2018 and just over 4 times as likely in year ending March 2019. This is likely to be because, as mentioned above, the number of overall searches has increased but the stop searches per 1000 amongst the White group has remained relatively steady since year ending March 2017 and has increased among BME groups in year ending March 2020.

5.4   A similar pattern was seen for the Black Ethnic Group (a subset of BME covering Black, Black African, Black Caribbean and other Black backgrounds) which fell from 6 times as likely to just over 4 times as likely between the years ending March 2012 and 2015, before rising to 6.5 times as likely in the year ending March 2016. This rose again to over 8 times as likely in the year ending March 2017 and then 9.5 times as likely in the year ending March 2018. This remained stable in the year ending March 2019 and March 2020, with those who considered themselves to be Black just under 9.5 times as likely to be stopped as those who considered themselves to be White.

5.5   In Suffolk, for the year ending 30 September 2020, those who considered themselves to be from BME groups were 3.2 times as likely to be stopped as those who considered themselves to be White. These statistics show a decrease in disproportionality in Suffolk as at the end of the year ending March 2020 those who considered themselves to be from BME groups were around 4 times as likely to be stopped as those who considered themselves to be from a White background.

6.   BEST USE OF STOP AND SEARCH (BUSS/HMIC INSPECTIONS/ALL PARTY PARLIAMENTARY GROUP FOR CHILDREN (APPGC) RECOMMENDATIONS

6.1.1   The Home Office has requested that all police forces in England and Wales provide returns in relation to progress against actions arising from Best Use of Stop and Search, HMIC PEEL Inspections and APPGC (in terms of use of stop and search on children and young people) in one standardised format.

6.1.2   Appendix A displays the latest statistics in respect of the Proportionality of Stop and Search Use in Suffolk in respect of BME and Age, for the period 1 July 2019 to 30 June 2020.

---

[5] Police Powers and Procedures England and Wales Year Ending 31 March 2020

7.   FINANCIAL IMPLICATIONS

7.1   There are no financial implications associated with this report.

8.   OTHER IMPLICATIONS AND RISKS

8.1   There are no other implications or risks associated with this report.