



SUFFOLK CONSTABULARY

ORIGINATOR: CHIEF CONSTABLE

SUBMITTED TO: OFFICE OF THE POLICE AND CRIME COMMISSIONER

SUBJECT: PROGRESS AGAINST HMICFRS INSPECTION RECOMMENDATIONS

SUMMARY:

1. This report provides an overview of progress made by the constabulary against a number of recommendations set by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) as a result of recent inspections and publications (as of October 2024).

RECOMMENDATION:

1. The PCC is asked to consider the progress made by the constabulary and raise issues with the Chief Constable as appropriate to the PCC's role in holding the Chief Constable to account.

1 SUFFOLK CONSTABULARY STRATEGIC PROCESS AND GOVERNANCE OF HMICFRS

- 1.1 Strategic oversight of all HMICFRS related matters is managed by the Deputy Chief Constable via a monthly Steering Group meeting held with senior management to track progress of recommendations made through published reports, review submissions for completed actions and manage preparation for inspections.
- 1.2 The Suffolk HMICFRS team is led by the Head of the Suffolk Delivery Unit (SDU; formerly Performance Improvement Unit) and the HMICFRS Force Liaison Officer (FLO). Both roles sit within the Futures Hub (formerly the 2025 Corporate Improvement & Innovation Team). This structure enables the force to coordinate and liaise with HMICFRS on the organisation and planning of inspections, data requests and the continuous improvement involved with HMICFRS related work.
- 1.3 Recommendations are recorded and allocated to strategic leads and progressed as required. It is a continuous improvement process and updates are provided to HMICFRS via the HMICFRS monitoring portal and continuous engagement with HMICFRS Force Lead Liaison (FLL).
- 1.4 Recommendations and AFIs from force inspections (e.g. PEEL and National Children Protection Inspections) are monitored through a six-weekly Bronze Coordination Group meeting chaired by the Chief Superintendent for Suffolk Crime, Safeguarding and Incident Management (CSIM). Recommendations and AFIs from national thematic papers or super-complaint reports are monitored at the same meeting on a quarterly basis.

2 PROCESS WITH OFFICE OF THE POLICE AND CRIME COMMISSIONER

- 2.1 Suffolk Constabulary has a structured process with the Office of the Police and Crime Commissioner (OPCC) in how we respond to HMICFRS publications.
- 2.2 All reports published by HMICFRS that involve recommendations or areas for improvement (AFIs) for Suffolk Constabulary, whether they are specific to Suffolk or applicable on a national level, require a response on behalf of the Chief Constable as to how the constabulary intends to progress any recommendations. This response is provided to the OPCC and published on their website alongside their own response. Links to the responses can be found [here](#).
- 2.3 Super-complaints do not follow the same procedure as national thematic reports, further information regarding super-complaints can be found [here](#).
- 2.4 The recommendations provided in the super-complaint reports are not mandatory for the constabulary to follow. The constabulary must report its stance on the recommendations to the National Police Chief's Council (NPCC) within six months of the published date. The NPCC collate responses from all police forces and publish an NPCC response to the super-complaint.

3 RECOMMENDATIONS AND AREAS FOR IMPROVEMENT (AFIs)

- 3.1 This report provides an update on the outstanding recommendations for Suffolk Constabulary as identified by HMICFRS through their inspection activity. This paper focuses mainly on the HMICFRS reports published since the last report in April 2024. There are currently 108 open recommendations and 19 open AFIs being progressed within Suffolk Constabulary.

3.2 Additionally, a further 41 recommendations and one AFI are ready to be submitted for closure to HMICFRS. This follows the process established by HMICFRS whereby forces can self-certify Level 2 and Level 3 recommendations and AFIs for closure by submitting a letter from the Chief Constable outlining the actions taken by the force to address. This is an ongoing process.

3.3 The following provides a breakdown of the internal status of recommendations and AFIs:

3.3.1 Recommendations: 108 open

- 67 in progress (including 35 new)
- 41 ready to be submitted for closure¹

3.3.2 AFIs: 19 open

- 8 in progress
- 1 ready to be submitted for closure

4 NEW NATIONAL THEMATIC REPORTS

4.1 Following are the details of three new national thematic reports published in the period since the previous report in April 2024 and/or not covered in the previous report. All the reports can be accessed from the title headings in this paper.

4.2 [An inspection report on progress to introduce a national operating model for rape and other serious sexual offences investigations in early adopter police forces](#)

4.2.1 This paper was published by HMICFRS on 21 August 2024 as a result of their national thematic inspection.

4.2.2 Suffolk Constabulary has provided a force response to the OPCC, which can be found [here](#).

4.2.3 The report detailed the findings of HMICFRS' inspection into the roll out of Operation Soteria, a national programme to transform how the Crown Prosecution Service (CPS) and police forces in England and Wales respond to Rape and Other Serious Sexual Offences (RASSO).

4.2.4 In total, the report made 14 recommendations, of which five are for police forces to progress. Suffolk Constabulary accepts these recommendations, which have been assigned to the Chief Superintendent of Crime, Safeguarding and Incident Management (CSIM) to progress. Suffolk Constabulary provided a response to the OPCC in September 2024. Progress against these is ongoing and is being monitored as part of the ongoing tracking process.

4.3 [An inspection into activism and impartiality in policing](#)

4.3.1 This paper was published by HMICFRS on 10 September 2024 as a result of their national thematic inspection.

4.3.2 Suffolk Constabulary provided a force response to the OPCC on 11 October 2024, and this has now been published on the OPCC's website.

¹ Recommendations or AFIs are considered ready for closure once submitted by the owner; these are either awaiting closure by HMICFRS or there are other recommendations within the same report still outstanding finalisation (currently all report recommendations are submitted for closure together)

- 4.3.3 The report details HMICFRS' findings of its inspection into activism and impartiality in policing. This inspection was conducted as a result of a section 54 commission in September 2023 by the then Home Secretary to investigate the extent to which police involvement in politically contested matters may be having an impact on the effectiveness, efficiency and legitimacy of operational policing, by influencing policing, policy, priorities and practice.
- 4.3.4 In total, the report makes 22 recommendations, of which nine are for police forces. Suffolk Constabulary accepts these recommendations, which have been assigned to relevant operational and organisation leads to progress. Suffolk Constabulary provided a response to the OPCC in October 2024. Progress against these is ongoing and is being monitored as part of the ongoing tracking process.
- 4.4 [The policing response to antisocial behaviour: PEEL spotlight report](#)
- 4.4.1 The paper was published by HMICFRS on 10 October 2024 as a result of their national spotlight inspection. Spotlight inspections utilise evidence gathered from the national PEEL inspection programme, force management statements, promising practice and publicly available data.
- 4.4.2 Suffolk Constabulary is in the process of responding to the OPCC and a response will be shared well ahead of the OPCC's response deadline in December.
- 4.4.3 The report details HMICFRS' findings from their spotlight inspection into the police response to antisocial behaviour, highlighting examples of positive practice and joint working between the police and other organisations to address antisocial behaviour.
- 4.4.4 In total, the report makes eight recommendations, of which five are for police forces. These have been assigned to the Chief Superintendent of Suffolk County Policing Command (CPC) to progress. Once an initial response has been formulated, progress against these will be monitored as part of the ongoing tracking process.

5 UPDATES ON PREVIOUSLY PUBLISHED NATIONAL THEMATIC REPORTS

- 5.1 This section will cover updates on recommendations and AFIs from previous publications that have significant updates, where recommendations have been addressed and submitted for closure or those that have had deadlines within the reporting period.
- 5.2 [A joint thematic inspection of the police and Crown Prosecution Service's response to rape – Phase one: From report to police or CPS decision to take no further action \(2021\)](#)
- 5.2.1 This report was published in July 2021 and included a total of 13 recommendations, eight of which were for police forces. Six of these have already been met and considered closed, however, two long-standing recommendations can now be updated.
- 5.2.2 A copy of Suffolk Constabulary's original response can be found [here](#).
- 5.2.3 Recommendation 1 is owned by Suffolk and Norfolk's joint Chief Superintendent of Justice Services and recommends all police forces to ensure information on protected characteristics of rape victims is accurately and consistently recorded.
- 5.2.4 This recommendation is subject to both national and systems work which is ongoing to ensure there is consistent national recording and definition of protected characteristics. NPCC

guidance was issued in 2023 to outline definitions and work now progresses to implement changes sequentially.

- 5.2.5 In addition to this, complex work is ongoing to develop the required changes in Suffolk Constabulary's records management system (RMS). This has to be completed and agreed by the nine forces using the system, and work is expected to be long-term in order to meet this recommendation.
- 5.2.6 Progress against this recommendation will continue to be monitored at Suffolk's HMICFRS Bronze Coordination Group.
- 5.2.7 Recommendation 3 is owned by Suffolk's Chief Superintendent of CSIM and recommends forces to collect data to record the different stages when, and the reasons why, a victim may withdraw support for a case. This coincides with a recommendation that the Home Office should review the available outcome codes so that the data gathered can help target necessary remedial action and improve victim care.
- 5.2.8 The information outlined in this recommendation remains difficult to obtain due to limitations within the constabulary's RMS. However, the work with RASSO victims outlined in this report has now been superseded by the force adoption of Operation Soteria, where a workstream is being progressed to understand the whole victim journey, including reasons for victim withdrawal. As a result, this recommendation will be remitted to the Deputy Chief Constable for closure, to be picked up as part of Operation Soteria.
- 5.3 [Police response to violence against women and girls – Final Inspection Report \(2021\)](#)
 - 5.3.1 This report was published in September 2021 and included a total of five overarching recommendations with multiple sub-recommendations, of which three were for police forces. Two of these have already been met and considered closed, however, the remainder continues to be owned by the Chief Superintendent of CSIM and progressed by the Superintendent of Workflow Management.
 - 5.3.2 A copy of Suffolk Constabulary's original response can be found [here](#).
 - 5.3.3 Recommendation 20 fell into the overarching recommendation that forces should review use of outcomes 15 and 16 in violence against women and girls (VAWG) offences. Specifically, this recommendation reads that the NPCC VAWG National Delivery Lead should develop and disseminate to forces a process for consistent and robust monitoring of outcomes 15 and 16 VAWG cases. At a minimum this should require inspector-level sign-off on these cases with rationale for the closure recorded and auditable.
 - 5.3.4 Following updated rules published by the Home Office regarding which investigations might fall into the category of Rape and High-Risk DA investigations and be subject to this recommendation, policies are being reviewed internally to ensure compliance.
 - 5.3.5 This will continue to be monitored at Suffolk's HMICFRS Bronze Coordination Group.
- 5.4 [A joint thematic inspection of Multiagency Public Protection Arrangements – "Twenty years on, is MAPPA achieving its objectives?" \(2022\)](#)

- 5.4.1 This report was published in July 2022 and included a total of 19 recommendations, four of which were for police forces. Two of these have already been met and considered closed, however, the remaining two can now be updated on. These continue to be owned by the Head of CSIM and progressed by the Superintendent for Demand Reduction.
- 5.4.2 A copy of Suffolk Constabulary's original response can be found [here](#).
- 5.4.3 Recommendation 18 recommends that police forces should ensure that all MAPPA nominals managed at Levels 2 and 3 are allocated to a suitably trained police offender manager. Currently, in Suffolk all Level 2 and 3 sexual offenders are allocated to an appropriately trained officer/staff member with attendance at MAPPA from the correct level police decision makers. Violence or dangerous offenders at Level 2 or 3 are allocated to a Locality Inspector with Detective Superintendent representation at MAPPA meetings. Additional training for Locality Inspectors is planned.
- 5.4.4 At present Suffolk Constabulary do not have any Management of Sexual or Violent Offenders (MOSOVO) trained officers working in relation to non-sexual offenders to support Locality Inspectors. However, a review of the constabulary's offender management structure has commenced in October 2024, which includes in its Terms of Reference a need to review the wider MOSOVO approach to include non-sexual offenders.
- 5.4.5 Recommendation 19 recommends that police forces should ensure that workloads for staff managing sexual offenders are reviewed against national expectations and, where found to be excessive, take steps for mitigation and communicate this to affected staff.
- 5.4.6 In 2023, four police officer posts were recruited to the Public Protection Unit (PPU) in order to provide greater support and resilience. During this time the ratio of Registered Sex Offenders (RSOs) to Public Protection Officers (PPOs) remains higher than the national guidance, although this has continually improved over time.
- 5.4.7 During 2024, an additional detective sergeant and two constables have been seconded into the unit with MOSOVO training to further support interventions and provide greater resilience. As with Recommendation 18, the review into the constabulary's offender management structure will consider caseloads and demand profiles in order to meet this recommendation.
- 5.4.8 Progress against these recommendations will continue to be monitored at Suffolk's HMICFRS Bronze Coordination Group.
- 5.5 [An inspection of vetting, misconduct and misogyny in the police service \(2022\)](#)
- 5.5.1 This report was published in November 2022 and included a total of 43 recommendations and five AFIs. Of these, 29 recommendations and all five AFIs were for police forces. These continue to be owned and progressed by the Superintendent for Suffolk Constabulary's Professional Standards Department.
- 5.5.2 A copy of Suffolk Constabulary's original response can be found [here](#).

- 5.5.3 Due to the volume of recommendations included in this report and its national priority, HMICFRS instigated a national programme to review individual force progress against these recommendations. This has required regular reporting, including providing evidence of how the constabulary has met each recommendation, and remote inspections conducted by HMICFRS inspectors.
- 5.5.4 As a result of this process, 20 of the 29 recommendations and three of the five AFIs have been met and verified by HMICFRS. This leaves nine recommendations and two AFIs that continue to be progressed by Suffolk and Norfolk's Joint Professional Standards Department and People Directorate.
- 5.5.5 These continue to be monitored at a monthly HMICFRS Steering Group, chaired by the Deputy Chief Constable, and will be reviewed again as part of the HMICFRS' next integrity inspection in Suffolk Constabulary (date currently unknown).
- 5.6 [An inspection into how well the police and other agencies use digital forensics in their investigations \(2022\)](#)
- 5.6.1 This report was published in December 2022 and included a total of nine recommendations, of which three were for police forces. Two of these have already been met and closed, however, the remainder continues to be owned and progressed by the Chief Superintendent of Joint Protective Services.
- 5.6.2 Recommendation 4 recommends that the NPCC and forces within England and Wales need to include the management of digital forensic kiosks in their governance and oversight frameworks.
- 5.6.3 Work continues to progress against this recommendation as part of a wider, comprehensive Digital Investigation Programme Board. Governance of kiosk performance is a consideration in three of the five workstreams under this programme.
- 5.6.4 This recommendation continues to be monitored at Suffolk's HMICFRS Bronze Coordination Group.
- 5.7 [An inspection of how well the police tackle serious youth violence \(2023\)](#)
- 5.7.1 This report was published in March 2023 and included a total of four recommendations, of which two were for police forces.
- 5.7.2 A copy of Suffolk Constabulary's original response can be found [here](#).
- 5.7.3 Work has progressed on both of these recommendations and the constabulary will now be remitting all for closure to the Deputy Chief Constable. Once agreed, these will be submitted for closure with HMICFRS.
- 5.8 [An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children \(2023\)](#)
- 5.8.1 This report was published in April 2023 and included a total of 17 recommendations, of which 11 were for police forces.
- 5.8.2 A copy of Suffolk Constabulary's original response can be found [here](#).

- 5.8.3 Work has progressed on all 11 recommendations and the constabulary will now be remitting all for closure to the Deputy Chief Constable. Once agreed, these will be submitted for closure with HMICFRS.
- 5.9 [PEEL Spotlight – Police Performance: Getting a grip \(2023\)](#)
- 5.9.1 This report was published in July 2023 and included a total of six recommendations, of which three were for police forces.
- 5.9.2 A copy of Suffolk Constabulary’s original response can be found [here](#).
- 5.9.3 Work has progressed on all three recommendations and the constabulary will now be remitting all for closure to the Deputy Chief Constable. Once agreed, these will be submitted for closure with HMICFRS.
- 5.10 [An inspection of how effective police forces are in the deployment of firearms \(2023\)](#)
- 5.10.1 This report was published in July 2023 and included a total of 12 recommendations, of which eight were for police forces. Five of these recommendations have been considered met and made ready for closure, with the remaining three continuing to be owned by the Chief Superintendent of Joint Protective Services.
- 5.10.2 A copy of Suffolk Constabulary’s original response can be found [here](#).
- 5.10.3 All three of these recommendations continue to be progressed. These will continue to be monitored at Suffolk’s HMICRS Bronze Coordination Group.
- 5.11 [Homicide prevention: An inspection of the police contribution to the prevention of homicide \(2023\)](#)
- 5.11.1 This report was published in August 2023 and included a total of three recommendations, of which two were for police forces. These continue to be owned by the Chief Superintendent for Joint Protective Services in Suffolk and Norfolk and is being progressed by the Superintendent for the Joint Major Investigations Team.
- 5.11.2 A copy of Suffolk Constabulary’s original response can be found [here](#).
- 5.11.3 Recommendation 2 of the report recommended that chief constables in England and Wales should devise an approach to make sure their force can, on a sufficiently frequent basis, produce an analytical report concerning its death investigations. This report should help forces better understand the pattern of death reports across the area and identify any linked series of death reports.
- 5.11.4 Further to the update provided against this recommendation in the [previous APP report](#), all police attended deaths in Suffolk are now recorded on the force’s crime recording system, a process which has now been included within the revised Sudden Death Policy for Suffolk and Norfolk Constabularies. This policy has been submitted for consultation and is awaiting final acceptance.
- 5.11.5 The Superintendent lead for this recommendation is also working with the constabulary’s analysts to establish parameters for a six-monthly review of death investigations recorded by the constabulary in order to meet this recommendation fully.

- 5.11.6 Progress against this recommendation will continue to be monitored at Suffolk’s HMICFRS Bronze Coordination Group.
- 5.11.7 Recommendation 3 of the report recommended that chief constables should make sure their force can quickly identify lessons from homicides and serious violence incidents.
- 5.11.8 Further to the update provided against this recommendation in the [previous APP report](#), the use of rapid debriefs following homicide and serious violence incidents has now been implemented in Suffolk and is being utilised in all relevant cases.
- 5.11.9 The constabulary will be remitting this recommendation for closure to the Deputy Chief Constable. Once agreed, this will be submitted for closure with HMICFRS.
- 5.12 [Race and policing: An inspection of race disparity in police criminal justice decision-making \(2023\)](#)
- 5.12.1 This report was published in August 2023 and included a total of 13 recommendations, of which four were for police forces. These are being owned and progressed by the Chief Superintendent of Joint Justice Services.
- 5.12.2 A copy of Suffolk Constabulary’s original response can be found [here](#).
- 5.12.3 Recommendation 6 of the report recommends that chief constables make sure that forces carry out comprehensive analysis of race disparity in police criminal justice decision-making, and where this analysis indicates that people from ethnic minority backgrounds are disproportionately affected, actions taken to explain, or revise, their ways of working.
- 5.12.4 In response to this recommendation a strategic analysis profile has been submitted in draft in relation to the racial disparity in the criminal justice system in Suffolk. This paper is due by November 2024, at which point the implications will be discussed in relation to recommendations 10 and 11 with regards to engagement with communities, the PCC and other agencies, and wider publication. Recommendation 8, which relates to the inclusion of Youth Justice Board data in the overall analysis, is being progressed alongside recommendation 6 as part of the strategic analysis profile.
- 5.12.5 Progress against these recommendations will continue to be monitored at Suffolk’s HMICFRS Bronze Coordination Group.
- 5.13 [An inspection of the effectiveness of the police and law enforcement bodies’ response to group-based child sexual exploitation in England and Wales \(2023\)](#)
- 5.13.1 This report was published in December 2023 and included a total of nine recommendations and one AFI, of which, four recommendations and the AFI were for police forces.
- 5.13.2 A copy of Suffolk Constabulary’s original response can be found [here](#).
- 5.13.3 Work is progressing across all of these action areas. Progress against these recommendations will continue to be monitored at Suffolk’s HMICFRS Bronze Coordination Group.

5.14 [Meeting the needs of victims in the criminal justice system \(2023\)](#)

- 5.14.1 This report was published in December 2023 and included a total of six recommendations, only one of which was for police forces.
- 5.14.2 A copy of Suffolk Constabulary's original response can be found [here](#).
- 5.14.3 Recommendation 3 of the report recommended that the College of Policing (CoP) should, with the NPCC and chief constables, develop minimum standards for the completion of victim needs assessments, which should include standards for timeliness of completion and clarity on the information to be recorded.
- 5.14.4 Suffolk Constabulary remains engaged in the national governance surrounding this recommendation in anticipation for when standards are finalised and released. This follows the new Victims Code being given royal assent in May 2024 in the Victims' and Prisoners' Bill, which is awaiting commencement by the Government.
- 5.14.5 Ahead of this, new metrics are currently being considered nationally for forces to report data on from April 2025, some of which are already being trialled in forces. Whilst Suffolk awaits confirmation of these, an existing Victim Code of Practice (VCOP) dashboard is being used to allow the constabulary to continue measuring performance against the victim's code at monthly performance meetings. This will be updated to reflect the new metrics once these have been confirmed by the NPCC.
- 5.14.6 Progress against this recommendation will continue to be monitored at Suffolk's HMICFRS Bronze Coordination Group.

6 SUPER COMPLAINTS

6.1 [The police response to stalking: Report on the super-compliant made by the Suzy Lamplugh Trust on behalf of National Stalking Consortium \(2024\)](#)

- 6.1.1 This report was published in September 2024 and includes a total of 29 recommendations, of which 16 are for police forces. These are owned by the Chief Superintendent of CSIM and are being progressed by the Superintendent for Workflow Management.
- 6.1.2 Suffolk Constabulary is currently in the process of compiling an initial response to these recommendations. As per recommendation 27 of the report, a response to each of these will be provided to the NPCC by 22 November 2024. As per recommendation 28, by the same date an action plan explaining what the constabulary will do against each recommendation will be published on the force website. By 27 March 2025, the constabulary will provide a further update to the NPCC describing the progress made against the action plan.

7 INSPECTIONS

7.1 [Police Effectiveness, Efficiency and Legitimacy Inspection \(PEEL\)](#)

- 7.1.1 HMICFRS conducted the latest PEEL Inspection of Suffolk Constabulary during Spring 2023. The report was published on 4th October 2023.

- 7.1.2 HMICFRS assessed Suffolk Constabulary in 10 areas of policing and made judgements in nine of these 10. The report issued a total of 14 Areas for Improvement (AFIs), one Cause for Concern (which includes three recommendations) and one Innovative Practice.
- 7.1.3 An initial response was provided to the November 2023 APP Board and can be found [here](#).
- 7.1.4 In order to address and monitor progress against each of the recommendations and AFIs, Suffolk Constabulary manage a Bronze Coordination Meeting, chaired by the Chief Superintendent for Crime, Safeguarding and Incident Management (CSIM), and attended by assigned leads for each area of HMICFRS inspection.
- 7.1.5 As per HMICFRS' procedure, all 10 recommendations will remain open to be assessed again at the next inspection (date TBC). However, a number of these are close to having been met within Suffolk Constabulary to be moved into a business-as-usual position and monitored periodically ahead of any future inspection.
- 7.1.6 In the last APP update in April 2024, it was indicated that the cause of concern for responding to the public had been reinspected by HMICFRS inspectors who were satisfied that all three recommendations had been met. Suffolk Constabulary received verification from the Eastern Region HMICFRS inspector Roy Wilshire that these had been met and closed in August 2024.

7.2 [National Child Protection Inspection \(NCPI\)](#)

- 7.2.1 The Suffolk Constabulary NCPI Inspection report was published in December 2022. The published report can be found [here](#). This report made 10 recommendations.
- 7.2.2 Suffolk Constabulary was reinspected by HMICFRS on the progress made against these recommendations in July 2023. The report following this reinspection was published in November 2023.
- 7.2.3 This reinspection found that six of the 10 original recommendations had been met by Suffolk Constabulary. A full update on progress was provided to the January APP Board and can be found [here](#).
- 7.2.4 The four outstanding NCPI recommendations continue to be progressed and monitored through Suffolk Constabulary's Bronze Coordination Meeting alongside the PEEL AFIs.
- 7.2.5 Two of these are currently undergoing internal audits to measure progress against the recommendations. Depending on the outcomes of these audits, these may then be submitted for closure. Audits are being conducted by the SDU.

8 FINANCIAL IMPLICATIONS

- 8.1 None

9 OTHER IMPLICATIONS AND RISKS

- 9.1 None