



Office of the Chief Constable
West Midlands Police Headquarters
Lloyd House
PO Box 52
Colmore Circus Queensway
Birmingham
B4 6NQ

Date: 23 November 2023

Wendy Williams CBE
His Majesty's Inspector of Constabulary
His Majesty's Inspector of Fire & Rescue Services

Dear Wendy,

Thank you for your letter dated 23rd November 2023 which now sets out the four areas of concern in writing. As I said to you on the telephone yesterday, I am very respectful of HMICFRS despite stating that I completely disagree with the decision-making to 'engage' West Midlands Police now. I have previously shared with you my opinion that this should have happened two years ago at the same time as Greater Manchester Police, based upon my research. I have already provided you with some tangible factual evidence which would inform a much more comprehensive and fairer assessment of the force, with a far greater level of attention to 'what is' and not 'what was'. The impact will be to significantly undermine public and workforce confidence at a time when it has just started to improve.

However, the actions I have taken since my appointment 11 months ago followed by the evidenced augmentation of performance and a new policing model negates the necessity to formally engage the force. My officers and staff are making a real difference which I applaud (even though they are so significantly fewer in number than they were in 2010). I am now able to write specifically in relation to the four areas which you have shared. This is very important as I do not believe you have been comprehensively briefed in relation to ongoing oversight, feedback, immediate rectifications or detailed explanations in a number of these areas which I will address incrementally. I have also reviewed my personal notes of the hot debrief last month before penning this response.

- 1) The force needs to make sure it carries out effective investigations which lead to satisfactory results for victims. Since our last PEEL inspection, we found that the force hadn't made enough progress in improving its standards of investigations, meaning not enough offenders are being brought to justice.*

As I said to you and your team from the outset, I set out some clear priorities when I joined WMP in December 2022 because I recognised that there needed to be an improvement in the number of offenders brought to justice. It was for this reason that I implemented a rapid overhaul of the operating model, creating in April 2023 seven new Local Policing Areas, each of which has local responsibility for responding to calls for service and investigating offences. Since I implemented this new model and opened two more custody suites, the arrest rate has increased from 3200 each month to 4200; and the number of offenders brought to justice has increased significantly (and continues to improve each month).

As a result of these rapid improvements, we are now the best performing force of all our relevant comparison forces for burglary, robbery and homicide. The number of rapes we solve has increased dramatically, such that we have now surpassed the national average. I share this information because I am aware that the inspection findings are based on old case files and old data, almost all of which was drawn from a time before I launched the new model.

The public should be reassured that there are clear and obvious improvements on the number of offenders being brought to justice.

We are arresting and bringing significantly more offenders to justice, not less. Broadly speaking our outcome measures have increased by around a third since April. Provisional national and force level data from the last month shows we have achieved greater crime reductions when compared to the previous 12-month period than most other forces.

The observation I shared with you quite openly is that the amount of formally documented supervisory oversight on some of our crimes is not where I would want it to be. I explained openly the reasons for that but would never criticise those who have gone before me. I also explained how the system often does not make it easy for our supervisors and what work we have done to address this under Operation Vanguard. Your force liaison manager is fully sighted and attends the DCC's performance meetings. Finally, I explained to you why I was more focussed upon pushing the public justice outcomes than investing in more checkers to explain why this work sits secondary to expanding our overall investigative capacity and capability; which is where I see the public interest.

- 2) *The force needs to make sure MARACs work effectively to keep vulnerable people safe. Excessive and inappropriate demand in MARACs means people might not be safeguarded promptly. There are delays in information being released to partner agencies and between referrals being received, triage and decision making. This fails to address and reduce the risk posed to high risk victims of domestic abuse.*

It is important for the public to understand that the MARAC process is a partner-agency arrangement that provides an additional layer of support to victims: it is not true to say that victims are not safeguarded as a result of delays in MARAC. That is simply misleading to the public. It is also important to highlight that the MARAC process is not one that is 'owned' by WMP. The MARAC coordinator is a post funded and line-managed by the OPCC. The contribution from partner agencies is voluntary rather than statutory, and given some of the high-profile financial challenges of our partners, this is an area which has been challenging, especially in Birmingham. It has been suggested – wrongly – that our officers chair MARAC. Whilst, as is often the case, police officers will share chairing responsibilities for multi-agency partnership meetings (especially if the designated chair is unavailable), chairing in MARAC is recognised as a multi-agency responsibility.

I accept and professionally seek West Midlands Police to have significant influence on the overall management of the MARAC process, and in particular, the rate of referrals. It was noted by HMIC that SafeLives estimates would suggest the number of referrals are higher than they should be in WMP. Further research has revealed that those estimates are based on 2011 Census data and have not been updated. Since the change from DASH to DARA, we understand that WMP are not the only force to see significant increases in referrals. Notwithstanding that, I have already directed that we review our referral criteria to accept more risk in line with other similar forces. This plan has already started to address the backlog; however, it is important to recognise that MARAC partnerships around the country are grappling with exactly the same, systemic issues. Most importantly, it is important to emphasise again that WMP always provides safeguarding to all victims, irrespective of eligibility for MARAC.

- 3) *The force does not manage the risk posed by registered sex offenders effectively. We found multiple shortcomings related to how the force manages the risk posed by registered sex offenders. This includes the use of data to understand the level of risk present in overdue risk assessments and home visits to registered sex offenders, and the frequency of supervisory oversight. The impact of associated pressures on staff morale and wellbeing should be understood.*

Whilst I concur with the broad findings in relation to the frequency of some visits and supervisory oversight, this statement goes nowhere near balancing just how much that has changed since April. I made a huge change to the force's operating model in April 2023.

One of the key features of the change was to take locally-managed SOMs units and merge them all under the central Public Protection Unit (PPU), precisely because it was recognised that the issues identified would be better managed by the specialist leadership of the PPU.

Already, the PPU has reduced outstanding risk assessments by 58%, instigated a new staff welfare programme and developed new performance dashboards that allow for scrutiny and oversight by senior management. Evidence of these improvements were shared with the HMIC Liaison at several meetings prior to the conclusion of PEEL.

- 4) *The force does not manage the risk posed by online child abuse offenders effectively. We found multiple shortcomings related to how the force manages the risk posed by online child abuse offenders and protects children, particularly in the timeliness and nature of enforcement and the prompt disclosure of safeguarding concerns to Social Services.*

I fully accept that during the initial inspection of OCSET between 5th and 8th June, there were a high number of cases awaiting enforcement (81), and that the disclosures to Social Services were not being carried out as expeditiously as I would have hoped. On the latter point, I am also aware, however, that HMICFRS had previously set 31st July as the deadline to implement this process. Whilst not in place in early June, this recommendation was implemented as part of the rapid improvement work and thus achieved *before* 31st July. It is somewhat puzzling, therefore, that it is referred to as an area of concern. Likewise, WMP have demonstrated to HMICFRS that outstanding enforcement packages have been dealt with. WMP now operates with roughly 20 outstanding cases at any given time – this represents normal turnover. This sustained performance was shared with the HMICFRS Liaison officer on three separate occasions prior to the end of PEEL. Of note, the liaison officer remarked in early August that the improvements were so dramatic that WMP appeared to have done so much work to avert even a cause for concern finding, and elicit instead a recommendation. We are now in November and again underline a palpable sense of unfairness in relation to your narrative. Hence, I do not believe that you have been comprehensively briefed.

I also want to address your 'key tests' as set out in your letter, as well as the stated purpose of PPOG, as described below: *The focus of the engage phase is to assist the force in finding ways to improve and resolve identified causes of concern, where they have not been successful in doing so independently. At this stage, forces are asked to carry out a comprehensive analysis and develop an improvement plan to set out how causes of concern will be addressed.*

Sex Offender Management and OCSET were specifically the subject of the rapid improvement plan that we instigated in July in 2023. As noted above, not only do we have a plan; that plan is demonstrably working and has been lauded by your liaison officer, who only as recently as today informs us that he has 'no concerns' about our direction of travel.

We have a rapid improvement plan for investigations, at the heart of which is the new operating model, and a new performance regime. Already, our management of volume investigations is demonstrably improving. HMICFRS are aware of this, because the liaison officer is invited to and attends the monthly performance meeting where this data is reviewed.

That meeting also considers wider performance, and as recently as last Thursday, your liaison officer was again offered evidence that the new operating model has yielded a dramatic improvement in performance. That improvement, which I described to you in the letter last week, shows that my new operating model has taken the force from one of the worst call-handling forces to one of the best in 11 months. It has already improved the proportion of emergency incidents attended within our specified targets by 25%. It has, as noted above, increased arrests and the number of offenders brought to justice by a third. Our crime reduction figures are at odds with the national trends since the change in operating model, and are the best in the country. These are all performance figures that we have shared with HMIC – without question or challenge from your organisation – on multiple occasions over recent months.

We therefore have verifiable evidence of our ability to address these issues independently, supported by comprehensive analysis of key performance metrics and driven through a very clear improvement plan that centres on a new operating model and performance regime. It is hard to reconcile the HMICFRS findings that WMP needs to move to engage with the facts. It is harder still to conclude that the six-part test you describe is satisfied.

I have shared my letter with the PCC who I am aware has been involved in separate communications with your office. Regardless of the outcome of my correspondence, I assure you of two things. Firstly, my respect for yourself and the HMICFRS remains unchanged. Secondly should your decision remain unchanged despite my feedback, I very much look forward to providing a comprehensive briefing at PPOG whilst hoping not to expend too much of their valuable time.

Kind regards,

Craig.

