



Bedfordshire Police & Crime Commissioner  
Communications and Engagement Strategy  
2017 – 2018



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Communication and Engagement Strategy  
June 2017**

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## **Introduction**

The most effective and far-reaching communications possible are vital to promote (and, when necessary, explain and defend) the work of Bedfordshire's Police and Crime Commissioner (PCC), Kathryn Holloway, her role and that of her staff. The most basic requirement of all communications from the Bedfordshire OPCC, whether internal or external, is that they must be open, accessible, accurate, accountable, transparent and responsive as far as possible within the law and constraints of both the Criminal Justice and investigative processes of the Independent Complaints Commission, given the policing sector in which we operate.

Such information needs to be delivered in the right place, at the right time, in the widest range of available formats to reach the maximum number of residents, officers and staff of Bedfordshire Police and our partners, across a similar spectrum of channels. All such communications aim to help achieve productivity, maintain strong working relationships at all levels - internally and externally - and build confidence and trust in the work of the PCC and OPCC, as well as explaining that of Bedfordshire Police, since the PCC is the public's democratically elected voice on policing in this county.

Having a consistent approach to communications is of high importance; in terms of creating a recognisable approach and style across the piece to achieve the accessible language, tone and narrative required by the Commissioner, as set out in her Police and Crime Plan. Documents for public release from the OPCC aim to avoid the conventional style of local government bureaucracy wherever possible and, instead, follow more closely the style of local and regional journalism for maximum impact and public accessibility.

They aim to be illustrated with photography, where possible, to reflect a local requirement; the county has one of the most diverse populations in the country and many of its residents do not speak English as a first language.

This strategy aims to provide all staff communicating on behalf of, representing or briefing, the PCC with the necessary information to ensure this consistent, professional and focussed approach to all communications issued within and outside the OPCC.

It sets out how the Commissioner and members of her team will engage with stakeholders and partners to promote and, if necessary, explain and defend the PCC's work and that of her office, together with that of Bedfordshire Police.

## **Strategic Aims and Objectives**

The main objective of this strategy is to outline how the OPCC communications approach supports the purpose and focus of the Police and Crime Commissioner and her Police and Crime Plan to:

1. Create a consistent and effective approach to communicate both internally and externally as an organisation
2. Be open, accessible, transparent, accountable and responsive
3. Gather views and involve the community in setting police and crime priorities and commissioning services
4. Inform the community of performance, how they have influenced priorities, how the PCC holds Bedfordshire Police to account and how they can access services
5. Outline the importance of effective communications that will support the work of the PCC and her office
6. Reflect and support the priorities outlined in the PCC's Police and Crime Plan
7. Provide relevant and useful information through a variety of channels according to the needs of the audience, stakeholders and partners

The guiding principle and foundation of all Bedfordshire OPCC communications is that the PCC requires her office to be a gatekeeper for public information in the sense that it seeks to be a conduit for the release of as much relevant information as possible in as timely a fashion as can reasonably be achieved within the constraints stated previously, and not in the sense that it will seek to restrict and contain information to the minimum. This is central to the culture of openness and transparency required by the PCC.

The Bedfordshire OPCC approach to communications and engagement is, naturally, continuously reviewed to allow improvements to be adopted and to achieve best practice.

The PCC and OPCC engage with news services on a daily basis to tight deadlines and, as a result, external communications are both proactively and reactively determined and managed and responses are delivered as quickly as possible, subject to the time taken for fact-finding.

### **Delivery of these objectives – the Commissioner and the Communications Team**

Central to successful delivery of this communications strategy, to meet its aims and objectives, is the personal media and communications experience and specialist skills of the Commissioner, Kathryn Holloway, together with those of her small team of communications staff.

Kathryn is a former national news reporter and presenter who started her career in journalism as a local reporter, in print, before becoming a regional television reporter and presenter. She worked across television, radio and print from 1981 to 2000, starting her career on one of Thomson Regional Newspapers' largest titles - The Newcastle Evening Chronicle – before moving to Tyne Tees Television. She then reported for ITN before joining national breakfast channel

TV-am. At the end of its franchise, Kathryn became a freelance presenter for Sky News, LBC and Talk Radio and wrote for national news titles including The Guardian and Daily Express. She also worked continuously as a television presenter across Sky, Pearson Television and independent cable and satellite channels for 8 years.

From 2000 until taking up the role of PCC in May 2016, Kathryn established a globally successful Crisis Communications consultancy working across the private and public sector. In this capacity, she spent 8 years until 2008 advising the UK's Civil Contingency Secretariat, working for both the Home Office and Cabinet Office with the HM Government Emergency Planning College. Kathryn became an Associate Director of training at the college and was an architect, as a result, of HM Government strategy on the release of public information in an emergency. Although her own client base was primarily corporate, at board level, Kathryn provided training, exercising and advice in breaking emergencies to approximately half the 43 police forces of England and Wales, as well as to the British military. Her additional specialist area relates to communications in emergencies involving mass fatalities.

As a result, the PCC's Police and Crime Plan commits Kathryn, and her office, to openly embracing news media opportunities, with a clear emphasis on local and regional print organisations and broadcasters. It, similarly, places emphasis on organising and attending public engagements to spread the word of her work, and explain that of Bedfordshire Police, as widely as possible.

The role of social media, in reaching the widest range of residents, is also central to this strategy with both the PCC and her office continuously engaging on Twitter and Facebook. In addition, the OPCC explores all opportunities for the PCC to contribute to county-wide publications on a regular basis, wherever possible.

The PCC is assisted in this work by both her Head of Public Information, who coordinates Communications Strategy for the OPCC and Force to ensure a joined-up approach, and a single communications officer. Both posts are held by individuals who are professional ex-journalists, with more than 30 years' collective experience across television, radio, print and social media.

### **The PCC's Police and Crime Plan and Communications**

The Police and Crime Plan – set out by Kathryn Holloway following her election as Commissioner in May 2016 – represents the strategic direction determined by the PCC for Bedfordshire Police between 2016 and 2020. It is published on the OPCC website: [Bedfordshire PCC Police & Crime Plan](#)

The Plan explains the priorities established by the Commissioner after working with communities across the county of 644,000 residents during her election campaign. It is the foundation for every activity of the PCC and her team.

The Commissioner holds the Chief Constable of Bedfordshire Police, Jon Boutcher, and the Force to account to deliver the priorities set-out in the Plan over her four-year term in office. In terms of Communications, the Plan clearly establishes the critical role of both internal and external communications in building greater confidence in the Force and the service it provides to the public.

Commissioner Holloway's Police and Crime Plan is designed to be accessible to all, suggesting common sense, practical achievable and affordable solutions to the challenges faced by Bedfordshire Police, and clearly explains goals which represent progress to the public.

All communications and public engagement activity by the PCC and her team must align with the pledges and commitments set out by the Bedfordshire PCC. This is especially true of the eight priorities of the PCC's Police and Crime Plan:

1. A return of more visible Community Policing across the County.
2. To re-build public confidence in Bedfordshire Police.
3. To ensure that the police are available when we need them most.
4. Putting victims at the centre of the way we police and prosecute.
5. A fair deal on policing wherever you live – in the town or country.
6. Protecting the police to protect the public with a proper duty of care.
7. Genuinely being a Commissioner for all communities.
8. Working with partners to break the cycle of serial offending and to prevent crime where possible.

All proactive news media releases and all public engagements aim to directly link such external communications with these priorities. In the case of public engagements, the booking matrix of the OPCC requires a link to be made to these priorities and/or content in the Police and Crime Plan as a whole before they are agreed.

This is important to the PCC as she is only the second individual to have held the post; this strategy aims to help her address public confusion that the role is ceremonial. The PCC's view is that it is more similar to that of the Chair of a large organisation, setting the budget and strategy of the Force (with the Chief Constable as the CEO, overseeing operational delivery of day to day policing.) This is to be a consistent message in OPCC communications.

Communications channels for delivery of this strategy:

- News releases
- Social media
- OPCC Website – including partner websites
- Force intranet / internal communications
- Press articles
- Third party newsletters
- Leaflets and literature
- PCC Monthly Newsletter
- Media relations
- Conferences
- Public engagement events

Local and regional media and news outlets:

- BBC Three Counties Radio
- BBC Look East
- ITV Anglia Tonight
- Bedford Times and Citizen
- Luton Herald
- Luton Today
- Leighton Buzzard Observer
- Dunstable Gazette
- Biggleswade Chronicle
- Bedfordshire on Sunday
- Heart FM
- Rosetta Publications
- Inspire FM
- Diverse FM
- Bedfordshire ORACLE
- PCC Monthly Newsletter
- Luton dentists'/doctors' surgery publications
- Latest news [Beds PCC Latest News](#)

### **Evidencing delivery of the Police and Crime Plan**

On 15 June 2017, the PCC set out the actions that had been taken against the eight priorities in her Police and Crime Plan during her first year in office. The One Year On report outlined the actions being taken by the Commissioner and Bedfordshire Police to see the return of more visible (and accessible) community policing through the implementation of 7 new Community Hubs, across the county.

The report also detailed new rural policing initiatives and the work to put victims at the heart of how crimes are policed and prosecuted, including the development of a new online pathway where victims can be referred to a range of support services (the Victims' Hub). The One Year On report is available on the OPCC website:

[Bedfordshire PCC](#)

### **PCC Matrix of Achievements**

In her Police and Crime Plan for Bedfordshire the PCC made a series of pledges and described projects to improve policing, victim support and community safety. A Matrix of Achievements is included in the PCC One Year On document and details 97 aspects of delivery against these pledges.

### **Boost the Frontline**

As PCC, Kathryn Holloway also commissioned a year-long independent study of Bedfordshire Police called Project Boost the Frontline, from policing expert, Simon Bullock, to provide his advice in three key areas; to maximise efficiency and effectiveness across policing in this county, to consider the officers the Force already employs to see how as many as possible could be returned to duty to boost the numbers of officers on the frontline and a literal component – ways in which to boost the morale, health and welfare of the officers and staff of the Force. The results of this study are also detailed as part of the One Year On report.

### **Communicating over Grant Funding**

As Bedfordshire's PCC, Kathryn Holloway is responsible for distributing funds to improve victim support and community safety across the county. Full details of all the grants that have been awarded, the organisations which received such funding and a description of the projects that have been funded by her office between May 2016 and April 2017 can be found on the OPCC website:

[Bedfordshire PCC Grant Funding 2017/2018](#)

A full list of such organisations and projects was also published as part of the One Year On Report document.

The OPCC also held a Partners' conference at Marston Moretaine to deliver information before the 2017/18 grants' process opened to provide details of those areas concerning which the PCC would particularly welcome applications, together with those of the applications process and a calendar.



## **OPCC News Media Engagement**

Press releases and news stories are proactively released and published on behalf of the PCC at least twice a week and distributed to the media using the communications software Vuelio. They are then uploaded onto the OPCC website and published on social media channels, including Facebook and Twitter.

In order to demonstrate fair and balanced release of such material across the local and regional media as a whole, the OPCC aims to proactively distribute media releases on Monday/Tuesday and Thursday/Friday, to meet the wide range of deadlines set for the 8 county press titles. The OPCC uses the embargo protocol (clearance for publication or broadcast of a release at a set time, as well as date) for key information to establish impartiality as far as possible, to avoid the impression that any one news organisation is being favoured over the others.

Naturally, responsive comments from the PCC can be released at any time, depending on the requirement and deadline.

The OPCC aims to prepare proactive material for release in the style of local and regional news stories, rather than simply as a conventional media release containing a summary of key facts requiring extensive further investigation, as a reflection of the very limited resources available to print titles in the county. The OPCC aims, therefore, to provide the maximum degree of cooperation and assistance to such titles to try to ensure that they are not disadvantaged in covering OPCC activity by their size and scale.

The PCC favours reaching out to members of the public as widely as possible through less mainstream media outlets; as examples, she writes both a monthly news column and news article with photography for the Rosetta free titles which are delivered to in excess of 50,000 homes across the county and, whenever invited, contributes to magazines for distribution in doctors' and dentists' surgeries and, through town and parish councils, to their residents.

She is happy to engage with community radio and television channels to allow her to speak directly with residents from the county's diverse communities; as examples, she has regularly been interviewed by Luton's Inspire FM radio station and made herself available to the town's Diverse FM channel and has been interviewed for Bangladeshi television news services, to reach out and speak directly to local Muslim communities.

## **Media Interviews**

The PCC alone will determine if she wishes to give an interview based on whether it is in the interests of the Force, the public, the OPCC and herself. Having taken an oath of impartiality, she will not give political interviews,

especially those seeking comment on national political matters, unless they relate to policing and a specific impact on Bedfordshire Police.

She is to be provided with a briefing document in advance of all interviews.

The briefing document must contain the following:

- The time, date and location of the interview, including the postcode
- The name of the interviewer and a contact number for them (or the producer, in the case of a broadcast interview)
- The name of the publication or programme (and whether it is live or pre-recorded or recorded “as live”)
- If live, she must be told whether it is a one plus one interview with the reporter/presenter or a down the line interview by earpiece. (The PCC must approve all down the lines as she will always prefer a recorded, face to face interview which gives the opportunity to correct the content, if required)
- A summary of the suggested subject matter must be stated eg the questions the journalist or producer wishes to ask plus the policing data/evidence the PCC will need in relation to the matter under discussion (with the PCC to create her own content regarding the way this is phrased, which she will usually share with the Communications team in advance, given time to do so)
- The journalist or producer must be told what the PCC wishes to say on the subject so the interview is of mutual benefit
- The names of other guests or interviewees and whether they will be present must be noted
- The PCC will prefer to speak last in the event of a sequence of interviewees to address the points raised by previous speakers
- She must be told if the programme includes live callers (if so, please request that the PCC has an opportunity to speak after callers to comment)

## **Media Releases**

Media releases will follow the house style of the OPCC, written as a local news story, and will comprise of:

- A short headline of a single line starting “PCC...”
- A short first sentence starting “Bedfordshire Police and Crime Commissioner Kathryn Holloway...” followed by an active verb in the present tense if possible eg “is promising”, “is pledging” or in the past tense if the event has taken place eg “launched”, “slammed”, “backed” (followed by the date in brackets after the event is mentioned)
- Followed by a paragraph stating what happened, when and where
- Quotes from the PCC should follow as two to three paragraphs. (This is the spoken word so these should include abbreviations, where necessary, eg “I’m”, “don’t” and should not include any word or phrase sounding like prose)
- These quotes will end with “said Commissioner Holloway.” on the first occasion. Subsequent quotes should end with “said the Commissioner.” or “said the PCC.” The words “commented” or “stated” can also be used
- The PCC will provide all her own quotes and these must not be changed without her permission and, only to correct an inaccuracy, by the Head of Public Information, in the event that she cannot reach the PCC and is entirely certain of the fact in question
- Two to three paragraphs should then provide further detail of the subject
- Quotes from other attendees should follow and be approved by them with the Communications team, ideally at the time of the event (or quoting what was said at the time) or, subsequently, before release for publication, as a courtesy
- Two to three further paragraphs of quotes from the PCC will usually follow to expand on the subject
- The release should end with a standard boiler plate of information about the PCC and contact details for the Communications officer together with any photo opportunity details or confirmation that any photography provided, is issued without charge or copyright restriction

## **Media Monitoring**

Google alerts have been set up for the PCC and OPCC to receive updates on any media coverage to allow a swift response, or correction, if required. Using the media monitoring organisation Precise, press releases can be tracked and coverage can be monitored. Along with all press releases and stories, data is

compiled of any and all media enquiries, interviews, press coverage and social media interaction by the PCC.

The OPCC has access to performance analytics to assist with tracing and recording media and social media commentary and coverage relating to the PCC, OPCC and Force as follows:

- Performance analytics to monitor media coverage
  - Monitoring of all media and press enquiries
  - Monitoring of all media and press mentions (using Precise monitoring service)
  - Weekly audit of followers/likes
  - Audit of comments on Facebook and Twitter
  - Monthly measurement of analytics
  - Newspaper clippings

### **Communicating through social media**

Social media interaction on the OPCC website and social media accounts is monitored daily and responded to where appropriate. The website is monitored on its performance, users, reach and duration of visit. This enables a review of what is working well and what needs updating. The PCC herself has in excess of 1,000 followers on Twitter.

Such social media reports are reviewed weekly to understand which posts worked particularly well, in terms of public response, and how many people were reached. This report also includes statistics on the number of “followers” and “likes” received.

Posts are designed to link in with the PCC and OPCC team’s public engagements and meetings and are diarised. At least one post a day is made, including activity at weekends to try to ensure a continuous line of communication with the Bedfordshire public and interested parties further afield. All media releases are posted on the PCC’s Facebook account.

The OPCC aims to link to partners’ websites, Twitter and Facebook accounts to jointly promote relevant activity. All OPCC media campaigns have accompanying and linked social media activity to reinforce these key messages and plans.

The OPCC also engages with local people and voluntary sector partners on a weekly basis as part of the “Beds Hour” on Twitter.

OPCC team members are also encouraged to actively engage with their colleagues throughout Bedfordshire Police on the internal Yammer service to promote their activities and work on behalf of the Force and public.

- Social media engagement
  - Facebook
  - Twitter
  - Hootsuite (planned tweets)
  - Beds Hour (every Monday 8.30pm - 9.30pm)
  - Yammer – internal communications channel

### **Communicating through the OPCC website**

The OPCC website is the main portal through which the public, media and partners can access information regarding the PCC and the activities of her office. There is a statutory requirement to post certain information so that it is available for public view.

Following the guidance of the Association of Police Authority Chief Executive (APACE), Bedfordshire's OPCC delivers and publishes information required.

The APACE guidance was compiled as part of a wider programme of transition work to support Commissioners and their staff in delivering their statutory requirements in a co-ordinated and effective way.

As part of this, the OPCC holds a weekly Communications meeting which includes as a standing item on the agenda; the responsibilities of each member of the team for the posting of material on the website and whether this is up to date.

The responsibility for posting material overall lies with the OPCC Monitoring Officer. However, the following members of the team have been given responsibility for collating and posting material on behalf of the PCC; the Policy Director records the PCC's decisions, the Engagements Officer posts details of engagements, events and visits, the Director of Victims' Services and Community Safety is responsible for posts concerning the commissioning process and grant funding and the Head of Public Information - through the Communications Officer - posts up to date news stories. The Chief of Staff has responsibility for ensuring all required meeting information is posted in timely fashion. The Chief Finance Officer and Monitoring Officer jointly share responsibility for the posting of the annual OPCC accounts, by the required deadline.

Where possible, relevant information is linked to partners' sites; for example that of the Police and Crime Panel which carries minutes of its meetings with the PCC and her team.

The OPCC website also includes interactive opportunities for the public to engage and seek information for clarity and convenience:

- Interactive use of the OPCC website
  - Complaints' procedures
  - PCC Grant Funding applications
  - PCC decisions
  - Engagement and event requests
  - Media inquiries and requests
  - Volunteer requests and applications
  - Latest News and events reports calendar

A weekly Communications meeting includes as a standing item on the agenda; the responsibilities of each member of the OPCC team for the posting of material on the website and whether this is up to date.

The responsibility for posting material overall lies with the OPCC Monitoring Officer. However, the following members of the team have been given responsibility for collating and posting material on behalf of the PCC; the Policy Director records the PCC's decisions, the Engagements Officer posts details of engagements, events and visits, the Director of Victims' Services and Community Safety is responsible for posts concerning the commissioning process and grant funding and the Head of Public Information - through the Communications Officer - posts up to date news stories. The Chief of Staff has responsibility for ensuring all required meeting information is posted in timely fashion. The Chief Finance Officer and Monitoring Officer jointly share responsibility for the posting of the annual OPCC accounts, by the required deadline.

Where possible, relevant information is linked to partners' sites; for example that of the Police and Crime Panel which carries minutes of its meetings with the PCC and her team.

## **Photography**

Photographs are taken at all events attended by the PCC which may be of public interest for inclusion in media releases and social media posts. The same is true for those attended by OPCC team members, although these are likely to be taken on mobile phones.

Where children are concerned, the written permission of parents and guardians must be sought where such adults are absent from the event. Alternatively, where they are present, their permission is sought in person.

Photography of events involving police officers may be provided by Bedfordshire Police's press officers or, occasionally, by its staff photographers who, typically,

cover such events as Passing Out Parades, Long Term Service Awards and Chief Constable's Commendation Ceremonies for the Force. The PCC attends all these events, and publicises them, whenever possible to promote the Force and the outstanding actions of its officers.

Any additional professional photography is provided to the OPCC (entirely free of charge), by a former Sunday Times news and sports photographer who has been fully vetted to attend such OPCC and Force events.

All photographs accompanying media releases or social media posts or OPCC publications and those of their partners are provided free of charge and without copyright restriction (save in exceptional circumstances in the case of the latter.)

### **Events, engagement, conferences and campaigns**

The Communications team of the OPCC, working closely with the PCC's Engagements Officer, produce key events, conferences and campaigns. This ensures that a single, joined-up message emerges from the office on behalf of the PCC.

Since the Head of Public Information sits across both the OPCC and Force in a strategic role, this means all PCC and Force campaigns are closely aligned and should never run "in competition."

Frequently, messages from both the Chief Constable and PCC are delivered in a single media release to accompany such joint campaigns.

The OPCC calendar includes a commitment to an annual Parish Councils' conference to reach out to Bedfordshire's rural communities and is attended by both the PCC and members of the Force's senior team and Rural Crime Team (Op Sentinel Rural) as well as members of the Special Constabulary and Watches (the 1,000-strong volunteers who deliver Speedwatch, Streetwatch, Neighbourhood Watch, Dog Watch and, as of autumn 2017, Horsewatch patrols) to create opportunities for recruitment.

The same is true of regular public meetings delivered by the PCC and individuals listed above. These may be arranged at the request of a public group, such as a parish or town council or a unitary local authority (such as Luton Borough Council who organised such meetings at both Hockwell Ring and Farley Hill in community centres owned and run by the council).

The OPCC runs events to target key partners, for example, to pass on key information to assist them in applying for grants.

To assist the PCC in her ambition to ensure there are no gaps and duplications in grant commissions to organisations delivering victim support and community

safety initiatives, the OPCC has developed regular ICE Summits (Innovate, Collaborate, Engage) with commissioners across the county, supported by the ICE Board. The OPCC arranges guest speakers at such summits to provide added value and information on aspects of policing which may affect partners (eg the Serious Organised Crime lead at the Home Office). Where possible, venues which are free of charge will be sought for this and other OPCC events.

The OPCC will arrange conferences to draw attention and pass on information about single crime issues, such as domestic violence or gang activity. The latter can be described as “visioning” events where they draw together an audience of partners to concentrate on a joint approach to a single crime and policing issue.

The OPCC oversees meetings of the Independent Advisory Group (IAG) to provide scrutiny on policing and is creating a young persons’ version of this body. The PCC attends the Stop and Search Scrutiny Committee, reviewing Body Worn Video worn by officers to provide feedback on best practice to the Force and to inspire confidence in ethical policing among the county’s communities, across a range of diversity.

As detailed previously, the PCC has issued, and will issue throughout her term, an annual report delivering evidence of progress against the Police and Crime Plan. This is accompanied by a brochure including a matrix of such achievements against the Plan and a list of all organisations which have been successful in their applications for grant funding, together with a description of the projects funded. All such reports in future will follow the format of the 2017 One Year On Report – Boost the Frontline, to ensure continuity and a “house style.”

This document is sent to all those attending the media conference which launches the annual review, plus those who were invited and could not attend, together with all local councillors and key partners in either hard copy or pdf form (to limit costs of printing and postage and to reach as many key stakeholders as possible).

The annual launch is also designed to provide a media opportunity to review a key area of the work of the OPCC which, in 2017, was the Boost the Frontline review commissioned by the PCC to establish how to increase the number of officers serving on the frontline of the Force and how to support them back to full fitness after sickness or injury.

- Campaigns in line with PCC Police and Crime Plan

- Rural Crime Unit
  - Blue Light Collaboration
  - Victims Hub
  - Youth Independent Advisory Group (IAG)



Boost the Front Line  
Special Constable Recruitment  
Sobriety Tags  
Occupational Health Targeted Schemes  
Road Safety for Young Drivers  
Community Cohesion Awards  
Local Area Process (LAP) Gangs & Serious Violence Review

Where possible press launches are immediately followed by a public engagement event with the relevant community e.g. the media launch of the co-location of police with the fire service at Ampthill Community Fire Station was followed by a meeting with local councillors and members of the Fire Authority. This approach aims to make the most of the time officers have taken away from their frontline duties to attend a media launch and, therefore, achieves a double benefit for the minimum loss of time to policing.

- Press launches

Rural Crime Unit  
Boost the Front Line  
One Year On  
Junior Police Squad  
Blue Light Collaboration  
HMIC  
PCC Grant Funding  
Violence against women  
Domestic Abuse – White Ribbon Campaign  
Recruitment of Special Constables  
Co-locations with Fire

## **Public Engagements**

The OPCC has an engagement and events [process](#) in place which, as previously detailed, ensures all events must be significant in relation to the Police and Crime Plan.

Using a Communications and Engagement Calendar, the OPCC - through the PCC's Engagements Officer and/or Communications team - can schedule various engagements for the Commissioner and her team that reflect the priorities of the PCC's Plan.

The OPCC receives external requests for the Commissioner to attend events, as well as to lead engagements with both partners and the wider public, including those from community and faith groups. She aims to attend such engagements throughout the county as a whole, as widely as possible.

It is part of the PCC's role to provide a commitment to meet, listen to, communicate and work with stakeholders, partners and the public alike. This is achieved through such public meetings, visits and events (as well as through surveys and feedback and through our newsletters and social media).

All public events and engagements the PCC attends must be accompanied by an advance briefing note, produced by either her Engagements Officer or Communications team, concerning the content and detailing those leading, and attending, the event.

The briefing note must include the time, date, duration and parking arrangements, the names of key individuals attending the event, its purpose, data and policing information relevant to the event and details of any media who are expected to attend.

Communications direction within a briefing pack for each event should include the requirements for use on the OPCC website and social media such as any quotes that will be needed, types of photographs to be taken and information for social media posts, outlining suggested lines and hashtags.

Every public event must be risk assessed in advance for the PCC with the relevant form completed and, wherever possible, she should be accompanied by a member of the OPCC team and, occasionally, by a police officer, if considered appropriate.

Where the PCC travels alone to the event, arrangements should be made for her to be met on arrival, for security reasons.

The PCC tries to accompany the officers of the Force's Community Cohesion team in their own public engagements for at least one afternoon per week. (This means she is accompanying a police officer who does not have to be abstracted from normal duties and her security is also not an issue.)

The PCC attends evening and weekend events of particular note to the community who invite her, when possible e.g. the Remembrance Sunday Memorial Service and wreath-laying in Bedford or Luton, the annual Peace Walk between places of worship of different faiths in Luton and the annual Ravidassi Guru birthday parade through Bedford.

The PCC alone will accept or decline an invitation. Such invitations are extended to her, and her office team, through her PA, Nuala Goldsboro whose contact details are as follows: [Nuala.Goldsboro@Bedfordshire.pnn.police.uk](mailto:Nuala.Goldsboro@Bedfordshire.pnn.police.uk) tel. 01234 842064.

As a guide, pressure on the PCC's diary means invitations to public engagements should, ideally, be submitted a minimum of two months in advance.

The PCC addresses larger public groups, by invitation, such as the regional meetings of the National Farmers Union, larger business groups, including the breakfast and other meetings of the Bedford and Luton BID organisations, together with community and faith groups.

To increase the public reach of her office, and to develop the skills and experience of younger officers among her small staff, the PCC delegates to "Ambassadors" within her office to address individual parish councils (as she addresses and chairs the annual meeting to which all parish councils are invited) as well as smaller public meetings such as those of Rotary groups and Women's Institutes.

As previously detailed, the OPCC also arrange regular public meetings with the Executive of the Force and other senior officers to address particular crime and policing concerns and to launch new police initiatives, such as a new Community Hub.

- Public open meetings
  - Police & Crime Panel
  - Annual Parish Council Conference
  - Community Hub Meetings
  - Watch Meetings
  - Rural Crime Conference

### **Communication over Public Involvement/Recruitment**

The OPCC runs the Independent Custody Visitor (ICV) Scheme and oversees training of visitors who inspect custody suites within Bedfordshire to ensure the appropriate treatment of those held there. The Business Compliance Manager oversees all recruitment and training and is the regional lead on ICV. She also assists with recruitment to the Independent Dog Visitor Scheme to ensure humane treatment of police dogs.

The Engagements Officer attends the Stop and Search Scrutiny Panel as part of the regular review of correct use of this police power and to reassure communities over ethical police behaviour.

The OPCC oversees the contractual arrangements for the Force's Restorative Justice service and communicates its effectiveness at partner events.

The PCC arranges for the Head of the Watches to attend her public meetings and also the Head of the Special Constabulary.

The OPCC regularly engages on social media to boost recruitment to all these schemes.

To construct effective public campaigns, the county's Crimestoppers' manager is to sit within the OPCC. The organisation oversees anonymous reporting of crime and is capable of constructing geo-fenced campaigns for particular areas.

### **Freedom of Information Requests**

Any member of the public, or media, can issue a Freedom of Information (FOI) Request to the OPCC.

The Office of the Police and Crime Commissioner is fully committed to complying with the Freedom of Information Act 2000 (FOIA) and its principles of openness and accountability of public authorities. The intention of this policy is to provide a framework for ensuring compliance with the provisions of the FOIA, in particular that:

- A growing proportion of information about the Office of the Police and Crime Commissioner is promoted to the public through the Publication Scheme;
- Information not available through the Publication Scheme is readily available on request, unless an exemption applies;
- Where reasonably practicable, information will be provided in a medium preferable to the applicant. When it is not reasonably practical we will notify the applicant of the reasons why.
- All requests for information are dealt with in a timely manner;
- Exemptions under the Act, and associated harm public interest tests, are applied appropriately.
- A fair and efficient internal appeal system is administered.

Such FOI requests are handled by a specialist member of the Bedfordshire OPCC team to ensure an efficient response, delivered by the required deadline or beforehand, where possible. The PCC takes the view that, if all the facts are to hand, a response should be delivered as soon as possible in the interests of openness. Naturally, some enquiries require more fact-finding than others but the OPCC will always aim to provide the most expedient response possible.

[Bedfordshire PCC FOI Procedure](#)  
[Bedfordshire OPCC FOI Process Guidelines](#)

## **Public Complaints**

The PCC is responsible for handling complaints against the Chief Constable, whom she holds to account, and for keeping members of the public informed concerning such complaints.

The PCC acts as the disciplinary body (appropriate authority) for the Chief Constable, and is responsible for complaints, conduct and death or serious injury matters concerning the Chief Constable of Bedfordshire Police Force. The PCC is also responsible for decisions regarding the recording of all complaint and conduct matters against the Chief Constable as set out within the Police Reform Act 2002. A complaint is an expression of dissatisfaction about the conduct of the Chief Constable which has been made by or on behalf of a member of the public. The member of the public must claim to be the person in relation to whom the conduct took place, or to have been adversely affected by the conduct or to have witnessed the conduct. A complaint can also be about matters of 'Direction and Control'.

The PCC must identify whether the complaint is about the Chief Constable's conduct, or if it is about an issue of Direction and Control concerning the Chief Constable. This is because complaints about Direction and Control matters do not have the same rights of appeal for the complainant.

## **Direction and Control**

A Direction and Control matter is one that relates to the direction and control of Bedfordshire Police Force by the Chief Constable, or a person for the time being carrying out the functions of the Chief Constable.

The IPCC considers this to mean general decisions about how the force is run, as opposed to day-to-day decisions or actions. For example, a complaint about an operational management decision directed to the force, such as a force-wide crime initiative, would be a complaint about a Direction and Control matter. Whereas a complaint about a specific decision by the Chief Constable on the deployment of officers for a particular operation, would be a complaint about the Chief Constable's conduct.

If the complaint is about the decision(s) of someone carrying out the Chief Constable's functions, then it will be passed to the police force to record and deal with.

## **OPCC complaints procedures and processes**

Recording Complaints:

Any complaint about the conduct of the Chief Constable will be recorded, unless it falls within the categories outlined below<sup>3</sup>. Reasons for a decision of non-recording of a complaint include:

- The PCC is satisfied that the subject matter of the complaint is already being dealt with;
- The complaint has been withdrawn;
- The complaint falls within a description of complaints specified by the Police (Complaints and Misconduct) Regulations 2012. These are special cases and apply if:
  - The matter is already the subject of a complaint made by or on behalf of the same complainant;
  - complaint discloses neither the name and address of the complainant nor that of any other interested person and it is not reasonably practicable to ascertain such a name or address i.e. an anonymous complaint;
  - The complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints;
  - The complaint is repetitious or fanciful.

#### Making a Complaint:

If people wish to make a complaint about the Chief Constable, they are asked to set out clearly what the complaint is about in writing to the address below:

Office of the Police and Crime Commissioner  
Bedfordshire Police Headquarters  
Woburn Road  
Kempston  
Bedford  
MK43 9AX  
[pcc@bedfordshire.pnn.police.uk](mailto:pcc@bedfordshire.pnn.police.uk)

#### Dealing with a Complaint:

The OPCC will acknowledge receipt of a complaint within five working days and the PCC will decide whether to record the complaint within 10 working days and notify you accordingly in accordance with the Statutory Guidance produced by the IPCC.

In cases where a complaint is recorded, the PCC will decide whether the complaint can be resolved locally or if there could be potential grounds for criminal or misconduct proceedings, which will require formal investigation and involvement of the IPCC.

The PCC will also determine whether any disciplinary proceedings should be brought against the Chief Constable. If such action is taken, you will be notified of the outcome.

Right of Appeal:

You have the right to appeal the decision of the PCC, in writing to the IPCC, who can be contacted at:

Independent Police Complaints Commission  
PO Box 473  
Sale  
M33 0BW  
Telephone: 0330 020 0096  
[enquiries@ipcc.gsi.gov.uk](mailto:enquiries@ipcc.gsi.gov.uk)

As can be seen, the handling of complaints relating to the Chief Constable is an intricate and complex combination of statutory and employment-related provisions. The Commissioner's website enables a member of the public to make a complaint and, depending on the type of complaint, this can then be handled by the most appropriate organisation and department. This removes the need for the public to have to understand the complexity of the internal complaints process that underpins the police service. This simplified process is also applied to the complaints for which the Office of the Commissioner is responsible. The Commissioner's complaints policy and procedure can be found on the OPCC website.

[Bedfordshire OPCC Complaints and Comments](#)  
[Bedfordshire OPCC Complaints Policy](#)

The PCC does not have a statutory duty at this point for the handling of public complaints concerning general policing. However, the Bedfordshire OPCC has agreed a Public Complaints Strategy with the Force when members of the public bring such complaints to her to try to achieve the most expedient response possible.

The PCC meets weekly to consider such complaints with her Business Compliance Manager, the Chief Constable's Staff Officer, a representative of the Force Control Room and has input from the Customer Services Department to discuss such complaints and seek answers for the complainant from the Force.

The Commissioner has received legal advice that it would be inappropriate for her to personally reply to such complaints. As a result they are answered by her Business Compliance Manager on her behalf, although she chairs the

Complaints process and has sight of all incoming complaints. The OPCC aims to issue regular updates in writing, by letter, email or phone call to complainants to detail progress in investigating their complaint unless in receipt of specific legal guidance not to do so. (Other delays may result from the absence of the Business Compliance Manager or other managers who are key to this process. The same is true of leave or sickness absence by officers who are central to the investigation.)

The OPCC updates aim to manage expectations since more serious matters are dealt with by the Force's Professional Standards Department and can take a significant period of time to reach a conclusion, given the obvious need for a very thorough investigation.

### **Public surveys**

The PCC has a statutory duty to consult with the public concerning policing in the county. In practise, in addition to public meetings, engagements and social media exchanges, a survey is the most effective way to communicate and capture the views of the public.

These surveys, on behalf of the Commissioner, are carried on the OPCC website [Bedfordshire.pcc.police.uk](http://Bedfordshire.pcc.police.uk) and the results are also posted, when analysed.

One example of effective use of a public survey was in response to the Police and Crime Plan.

Engagement included:

- Question - The Police & Crime Plan sets out eight priorities. Please state the priority you value the most.
- Response – 45% said to ensure that the police are available when they need them the most.
- Question – How safe do you feel in the area you live?
- Response – 69% said safe or very safe.

Such surveys have included:

- Public /stakeholder and partnership surveys:
  - PCC Annual Survey
  - Police and Crime Plan Survey
  - Parish Council Priorities Survey
  - Rural Crime Priorities Survey
  - Victims Survey

Communications with the Police and Crime Panel:



The Police and Crime Panel hold the PCC to account and their role is both to “support” and “challenge” her in her role. The PCC aims for the relationship with the Panel, and flow of information to it, to be open and transparent. This strategy document, for example, will be volunteered to the Panel for them to understand the ways in which she is trying to engage with them, the Force, partners and the public.

The Panel meets, in open session which the public and media are entitled to attend, approximately bi-monthly. Minutes of these meetings with the PCC and her staff are published by the Panel and a link to this section of their website is available on the OPCC website. [Bedfordshire Police & Crime Panel](#)

The Panel request papers and review the budget as well as hearing a report on policing from the PCC in person at each meeting. They can ask for a response on any matter that they wish to examine (save for those protected for reasons of national security or details of current police surveillance, for obvious reasons.)

All engagements of the PCC are detailed for the Panel at each meeting so that they can have sight of the public-facing part of her role. She also wishes them to have copies of all intervening media releases to understand the promotional activity of her office.

The PCC has, of course, had sight of the Panel’s own communications strategy. It is not practical, in the course of fast-moving media responses to breaking news to issue such comments of her own in advance to the Panel. However, whenever the PCC wishes to issue a media release mentioning the Panel and its activity, she will endeavour to do so, with the Communications team contacting the Chair and, where relevant, asking for a comment to add to the release.

The Panel were invited to her annual report launch and received copies. The PCC also attended and engaged in their “away-day” of discussion in July 2017 where the Panel indicated that they would like to issue their own response to her annual report and a media release concerning it, in future. The PCC is, naturally, delighted to accept this offer but the annual report itself is her own report on progress against her Plan so the Panel report will add value and be an addition, rather than part of her report itself, from 2018. If desired, the Panel may wish the OPCC Communications team to distribute their own report so that it reaches the widest range of possible media outlets.

The PCC has welcomed a suggestion that individual Panel members become “portfolio holders”, with responsibility for linking to the OPCC on individual crime and policing matters eg rural crime or gangs, to report back to their fellow members in greater depth than a main meeting agenda item, with or without the PCC in attendance. However, she has asked them to bear in mind that she has a

small team of less than 10, including secretarial staff, and asked the Panel to adjust the additional workload for her team accordingly.

In addition, the PCC openly welcomes the opportunity for individual members of the Panel to work with her in “Task and Finish” groups or creating “reviews” to assist her in more fully informing the Panel of progress in individual areas. For example, she asked the Panel to review the fast-moving Estates Strategy of the Force in 2016, updating their earlier review completed during her predecessor’s tenure.

### **The Monitoring process of the OPCC and PCC activities**

The work of the PCC and OPCC is monitored through two formal statutory mechanisms – the Police and Crime Panel and the Joint Audit Committee.

The role of the Police and Crime Panel is to formally hold the PCC to account. In doing so, they must review or scrutinise the decisions or other actions taken by the PCC, and make any reports or recommendations to the PCC they consider appropriate. This process ensures there is regular monitoring and oversight on all activities undertaken by the PCC, including the delivery of the Police and Crime Plan.

The role of the Joint Audit Committee, for the PCC and Chief Constable, is to provide independent assurance on the adequacy of the corporate governance and risk management arrangements which are in place. The Committee will provide advice according to good governance principles and proper practices. At these meetings, the OPCC Chief Executive and Chief Finance Officer communicate the risks facing the OPCC and Force and the steps being taken to mitigate or remove those risks.

### **PCC Newsletters**

The PCC communicates at the beginning of each month with the Police and Crime Panel, councillors and other partners, by publishing a newsletter on the OPCC website. [Bedfordshire PCC Newsletter](#)

The intention is that this can be printed off easily by clerks to parish and town councils, local authority partners and voluntary organisations and can be accessed by anyone with an interest in the Commissioner’s work and that of her office.

It opens with an introduction, written by the PCC, and a summary of all key public activity by her and the OPCC team in the preceding month. Each summarised item has a link to more in-depth coverage of each matter for those with a particular interest in it.

The Engagements Officer seeks to add email contacts to extend email distribution of this newsletter at each public meeting.

### **Communications with Partners through engagement**

The work of the OPCC is linked to the activities of multiple partners across local authority departments, other blue light organisations, the voluntary sector and the Association of Police and Crime Commissioners. For example, members of the OPCC attend meetings of the Community Safety Partnerships (CSP) in all three unitary authorities in the county, alongside police officers, and other emergency service representatives. The PCC also attends the 3 CSP Executive meetings, at least annually, on invitation.

The PCC sits on the Bedfordshire Fire and Rescue Service (BFRS) Fire Authority and will have full voting rights when the Home Office reviews the current “combination order” regulations. She meets regularly with the fire service’s Chief Officer, Paul Fuller, and the head of its Collaboration team, Deputy Chief Officer, Glen Ranger.

She chairs the Bedfordshire Criminal Justice Board, regularly communicating, as a result, with member organisations including the Crown Prosecution Service, Community Rehabilitation Company (CRC, the local former probation service), the national Probation Service, the Youth Offending Service and HM Prison Bedford. The NHS (through Clinical Commissioning Groups) has been asked to engage with this board.

The PCC meets regularly with leaders and CEOs of the three unitary local authorities and has addressed Bedford and Luton Borough Councillors and the ruling Conservative Group of Central Bedfordshire Council, by invitation.

As detailed earlier, the key means by which the PCC links her grant funding activity to partners is via the ICE Summits and ICE Board, drawing together those with funds to commission services to support victims and prevent crime.

Where grant-funding is concerned, the OPCC has held a partners’ conference to detail the commissioning process and offer advice. The PCC explained the nature of services which particularly interest her, in terms of commissioning, such as women’s refuge and diversion from Domestic Violence and Gangs.

When it came to the decisions on grant funding, members of the local authorities’ safeguarding services joined representatives from CRC and the Police and Crime Panel, together with the chair of the Bedfordshire Victims Partnership on the PCC’s panels, at her invitation, to consider the larger grant applications to her Ministry of Justice fund.

The PCC has been invited to attend the Bedford and Luton Local Resilience Forum (BLLRF), given her Civil Contingencies expertise. The Head of Public Information will attend the Warning and Informing Group and review the county-wide Emergency Communications Plan. The Director of Victims' Services and Community Safety will attend the Vulnerability Board. As part of this strategy, the PCC has offered to address BLLRF partners, offering advice on her specialist subject of the release of public information in an emergency. She has offered assistance from her Communications Team in free media interview training to prepare spokespeople in partner organisations for such an emergency and to act as "players", simulating national media interest, in BLLRF's future exercises, to increase resilience and preparedness in the county.

The Director of Victims' Services and Community Safety regularly engages with heads of child and adult safeguarding teams and those involved in crime prevention and victim support.

The Director and her team regularly sit on the Bedfordshire Criminal Justice Board, Reducing Reoffending Board, Victims and Witnesses Board, Victims Hub Board, Local Authorities Executive Group, Military Covenant Board and ICE Summits.

In addition meetings that are regularly attended and contributed to by the Director of Victims' Services and Community Safety include:

- OPCC Grant Funded organisation leads
- Proposed OPCC Grant Funded organisation leads
- Bedfordshire YOS Board
- Luton YOS Board
- Restorative Justice Steering Group
- Marie Collins Foundation
- University of Bedfordshire
- Victims' service organisations across Bedfordshire
- Ministry of Justice representatives
- SARC location negotiation
- Crimestoppers co-ordinator
- Public Health Governance Group

The ambition for the OPCC is for Co-ordinators in specific areas of crime prevention to sit within our office, overseeing a county-wide approach to each problem, while assisting in creation and delivery of local plans. The first such coordinator – the Gangs and Serious Youth Violence Co-ordinator - is due to be recruited in September 2017. He or she will divide their time between the OPCC and three unitary authorities, working closely with our safeguarding partners in these organisations.

The PCC's Policy Director engages with partners to work together on delivery of aspects of the Police and Crime Plan. For this reason it is essential that she is linked to them as part of their core meeting structure.

The OPCC's Business Compliance Manager oversees the Independent Custody Visitor (ICV) scheme and that for Independent Dog Visitors. As the regional lead on ICV for the Triforce alliance of Bedfordshire, Cambridgeshire and Hertfordshire police forces she regularly attends related meetings with partners in relation to this work. These include:

- ICV Panel – internal with all of our ICVs (Quarterly)
- ICV Tri-Force Quarterly Managers Meeting (Quarterly)
- ICV Regional Managers Meeting (Quarterly)
- ICVA Meeting – National Expert Forum (NEF) – attend as the regional lead (Quarterly)
- ICVA Annual Conference
- ICV 6 weekly meetings – internal with inspectors
- ICV Annual Regional Conference
- Dog Volunteers meeting – every six months
- Complaints Meeting – every two weeks

The Chief of Staff/Chief Operating Officer attends all Chief Officer meetings with peers in the Triforce, 7 Force Eastern Regional Alliance, at the Association of Police and Crime Commissioners and as part of the Association of Policing and Crime Chief Executives (APACE). He or she attends other partner events, as necessary, to deputise for the PCC.

The Chief Finance Officer also attends key meetings of peers across OPCCs including:

- Regional Finance Steering Group (bi monthly)
- Attendance Management Board (4 weekly)
- Representation Workforce Group (bi monthly)
- Estates Working Group (quarterly)
- Strategic People Board (4 weekly)
- ERP Programme Board (4 weekly)

### **Examples of Partners' involvement 2017/18**

Local Authority Chief Executive Meetings

Ice Summit – commissioning and grant funding organisations

Bluelight Collaboration with Bedfordshire Fire and Rescue Service

Victims' Commissioning Panels

PCC Grant Funding applications

Boost the Front Line/ One Year On Event

BCH Criminal Justice Board  
Bedfordshire Victims' Partnership  
Community Safety Partnership Boards  
Local Safeguarding Boards for Children & Vulnerable Adults

- Stakeholder events:
  - Partners' Day
  - Ice Summits and Boards
  - Boost the Front Line/First Year Report event
  - Rural Crime Unit Launch
  - Community Hubs meetings
  - Annual Parish Council Conference
  
- Partnership communications:
  - BCH Criminal Justice Board
  - Bedfordshire Victims Partnership
  - Blue Light Collaboration - Beds Fire & Rescue
  - Bedfordshire Watch Schemes
  - Bedfordshire Hate crime Partnership
  - Crimestoppers
  - Victim Support
  - PCC Monthly Newsletter
  - Tailored emails to partners and stakeholders
  - Regular visits to partners and stakeholder organisations

### **Communications with the Association of Police and Crime Commissioners**

The APCC represents all PCCs, as their national body in communication with HM Government and the National Police Chiefs Council (NPCC, which is funded by PCCs). As a representative body, the APCC is also approached for generic comment by the media (and can, in turn, approach individual PCCs via its own press officer to facilitate comment by them to journalists in individual geographic or subject areas).

The PCC attends an Annual General Meeting (which is generally addressed by the Home Secretary or Policing Minister) and regular meetings to brief Commissioners at the APCC, as well as an annual meeting arranged by the organisation with national media and specialist policing publications (plus broadcasters, such as the producer of "Crimewatch".) She attends an annual joint APCC and NPCC event with police chiefs.

The APCC provides a daily news update to all PCCs concerning key news stories involving them and their offices. It, therefore, monitors all such activity on a daily basis and creates a national news archive.

The APCC communicates on a virtually daily basis with PCCs and their Chief Officers to request responses to research or papers on behalf of the Government, NPCC or specialist leads in policing areas such as Counter Terrorism.

The Commissioner has a standing role on the APCC's National Strategic Committee on Counter Terrorism.

As an APCC Portfolio Holder, the Commissioner chairs a key committee covering the Government's Strategic Policing Requirements. These are set by the Home Secretary and relate to terrorism, serious organised crime, cyber security, public disorder and civil emergencies and, a more recent addition, child sexual abuse. All PCCs have to consider such strategic requirements as part of their remit across all police forces. This committee also considers International Policing matters. Kathryn Holloway will deliver an annual presentation on the committee and matters it has considered to other PCCs at the APCC in November 2017.

### **Internal Communications / OPCC**

A weekly "Comms Cell" is held on Mondays for all staff and is chaired by either the Chief of Staff or Head of Public Information to share the planned activity of the OPCC team and key events during the week ahead. The daily whereabouts of members of the team are logged on the OPCC wallchart. At this meeting, a review must be held of the information required to be published on the OPCC website, by statute, and the up to date status of such postings.

The PCC holds one to one meetings of at least an hour's duration with each of the following directors on at least a bi-weekly basis; the Chief of Staff, Head of Public Information, Policy Director and Director of Victims' Services and Community Safety.

She meets daily, unless engaged in other events, with both her PA, to review correspondence and invitations, and the Communications Officer to plan media releases and responses.

Directors regularly hold "brain-storming" sessions with the entire OPCC team to draw inspiration for planned conferences, events and campaigns.

The whole team has been offered the opportunity to attend Force training events together such as inter-faith cultural days, firearms courses and training in the THRIVE (Threat, Harm, Risk, Vulnerability, Engage) protocol by which Bedfordshire Police assesses all police responses within the Force Control Room and public engagement, to better understand the challenges of officers and police staff and to bond as a team.

The team has commenced a planned series of informal team-building meetings hosted by the PCC and members of the team itself.

There is a clear management structure and line managers are required to liaise regularly with their reports. Only the PCC and Chief of Staff have individual offices so, in practise, this is a continuous process, within a single office.

### **Internal Communications with the Force**

The PCC holds weekly Force Business Meetings which comprise an hour-long meeting with the Chief Constable or, alternatively, Deputy Chief Constable. These meetings are the foundation of her “holding to account” function and allow either party to raise current operational issues and progress. In addition, the Chief Constable updates her virtually daily on significant breaking operational activity and vice versa, in person or by phone or email, so that each ensures no opportunity should exist for either to be embarrassed by the media, public or partners by leaving them unaware of matters of significance.

The PCC receives daily reports on overnight operational activity from her Communications Officer and a written report on that of the Joint Protective Services provided on a triforme basis (eg Firearms, Dogs and Roads Policing.)

The PCC chairs a monthly Strategic Board, reviewing the performance of Bedfordshire Police. It is for the OPCC to request the papers and evidence it requires for this meeting and for the Force to provide it. The Chief of Staff draws together such papers for the PCC. In practise, the Policy Director and Head of Force Liaison work with Bedfordshire Police’s Executive and Data Analysts to produce this material and then brief the PCC in an advance meeting.

This Strategic Board should typically include a verbal update from the Chief Constable on the previous month’s activity, reports from the Force Executive on progress against the inspections of the police watchdog - Her Majesty’s Inspectorate of Constabulary (HMIC), a report from the Force’s Change Management Team, a review of the actual staffing of Community Hubs – measured against those promised to the PCC, HMIC and partners by the Chief Constable in his milestone strategic plan (and matrix) and crime performance figures concerning each key crime type and the numbers of crimes committed over the last month, 3 months ago, 6 months ago, 1 year ago and 5 years ago in the same month: this allows the PCC to make a proper consideration of short, medium and long term performance by the Force.



In terms of triforme working, with Hertfordshire and Cambridgeshire Police, or the 7 Force Eastern Strategic Alliance (of Bedfordshire, Hertfordshire, Cambridgeshire, Norfolk, Suffolk, Essex and Kent), the PCC attends regular alliance meetings alongside the Chief Constable and Chief Finance Officer and their corresponding peers. The OPCC Head of Public Information is in regular contact with her opposite numbers across both alliances and works with them to develop key collaborative activity (eg a new Bedfordshire Police website) and to approve joint media releases.

The PCC meets regularly with the Force's staff associations – both the staff union UNISON and the police "union", the Police Federation, at their request. She engages regularly with both on social media, especially Twitter, and, in the case of the Police Federation, has regularly attended its local and national events, by invitation, including the Police National Bravery Awards.

She both corresponds with and has met representatives of the Association of Retired Police Officers for Bedfordshire.

The PCC follows, and is followed in return, on social media, particularly Twitter, by individual officers and police sections. Examples include the Community Cohesion team, the BCH Dogs' Unit and the North Bedfordshire Community team. She very regularly re-tweets or comments on such messages and receives direct responses in return.

On occasion, the PCC wishes to communicate a message internally to all officers and staff and does so via the Force Intranet service under a title banner, with a photograph. Such messages have been issued following the announcement of investigations by the Independent Police Complaints Commission (IPCC), after critical reports by HMIC and following national news events involving policing, such as the murder of PC Keith Palmer in the Westminster terror attack.

Where IPCC investigations are concerned, the Force is generally unable to make any explanation of the event under investigation. The PCC takes the view that, as the public's voice on policing, it is for her, on occasion, to provide some context for the public (potentially in defence of officers at the scene) to prevent rumour and speculation which can destabilise communities and lead to a mistaken assumption of wrong-doing. She is, naturally, always mindful of the need never to undermine an IPCC investigation or any future court case (following an arrest, when Contempt of Court restrictions come to play concerning what may or may not be said.)

The PCC judges her comments regarding police actions on a case by case basis and, when she has considered these have been unacceptable, she has been equally forceful when speaking out in public.

The PCC regularly films videos for inclusion on the Force's intranet service, for example in response to HMIC reports or to mark particular anniversaries and events such as Idahot Day, to support LGBT colleagues.

She takes part in ride-along whenever possible and such events have included accompanying officers in Roads Policing, the Dogs Unit, the Night Time Economy vans and patrols, joining the Mental Health Street Triage team, a joint exercise between Bedford's Community team and British Transport Police and attending a Firearms training course.

The PCC tries to speak to every officer and member of staff she encounters as she moves around the police estate or when encountering them on duty. She regularly takes the opportunity to meet officers engaged in Night Time Economy policing, unannounced, when travelling through Bedford in the early hours of the morning, for example. She tries to accompany the officers of the Community Cohesion team in their activities for an afternoon each week.

The Commissioner attends and addresses as many Passing Out Parades, Recruitment events, Long Service and Chief Officer Commendation Awards as possible, alongside the Chief Constable or members of the Force Executive.

She addresses key events for officers and staff to mark important events when gathering at the Kempston HQ flagpole, and at Luton police station, such as in the wake of the Manchester and London terror attacks of 2017 to demonstrate solidarity and support.

### **TriForce and Seven Force Eastern Strategic Alliance communications**

- Monthly meetings are held with the heads of Communications from all of the three Forces (Bedfordshire, Cambridgeshire and Hertfordshire), to help ensure that – where appropriate – joint messages are distributed internally and externally.
- The TriForce website and intranet procurement, planning and production has been a project that has included communications officers, IT specialists and has all unit collaboration and input across the three forces.

- Regular TriForce OPCC communications meetings are held to discuss joint-working and appropriate messaging on behalf of the Commissioners.
- Bedfordshire Police Full Exec Board Meetings are held on a monthly basis.
- Leadership Workshops which bring together the managers and senior officers from across Bedfordshire Police to discuss areas of improvement and communications planning are held on a quarterly basis.
- OPCC Monthly Business Review Meetings are held to discuss finance, governance, policy, communications and compliance.
- Weekly OPCC communications meetings are held to discuss, schedule and plan events, engagement, PR and campaigns.
- Daily Bedfordshire Police communication team meetings are held to discuss matters of the day, incidents, and portfolio PR campaigns planning.
- The Bedfordshire Police and Crime Panel meet on a monthly basis.
- APCC meetings are held quarterly to discuss communications across all 43 police forces in the UK.
- PCC Communicator Workshops are held quarterly.
- Monthly communications meeting with the regional head of Crimestoppers UK to discuss PR and campaigns.
- APCC & NPCC Partnership Summits are held twice yearly.

## **Communicating with HMIC**

Her Majesty's Inspectorate of Constabulary (HMIC) is the police watchdog. They inspect forces and provide an assessment of what they think, concerning the findings, based on relatively short visits of a week at a time to a police force and interim, follow up, inspections. The main inspections seek to establish, and grade, policing performance around the key pillars of the PEEL process – Efficiency, Effectiveness and Legitimacy – though HMIC can conduct other inspections concerning individual areas of policing, such as Child Protection, and can be commissioned by PCCs to do so, on request and by agreement.

HMIC communicate principally with our PCC through the Inspector assigned currently to Bedfordshire Police, Zoe Billingham. HMIC's gradings in reports concerning the force stand, at the time of writing, at "Good" for Legitimacy (how the Force treats the public and its own officers and staff), "requires improvement" for Efficiency and, a unique grading in British policing, of "Inadequate" for Effectiveness. The Inspector has expressed her deep concern over whether the Force can deliver the service she expects at its current level of resourcing; the

available funding and number of officers (approximately 1,100 for a population of 644,000 with some of the most complex crime challenges in the UK, including the third highest level of terror risk and substantial Serious Organised Crime and Gang-related crime, which is a cross-over with the nearby capital).

As a result of these gradings, Bedfordshire Police is subject to a monitoring process by HMIC. The PCC and Chief Constable have attended its Policing Performance and Oversight Group (PPOG) meeting, in 2017, which is a new element of the process, to communicate their case regarding the improvements and progress of the Force, despite its evident challenges of meeting the existing demand within its straightened budget.

The PCC has formally raised a concern over the impartiality, balance and fairness of the HMIC Inspections with regard to Bedfordshire Police. The process is by no means clear; she has been required to submit the matter to the Chief Operating Officer but the matter is now under investigation by the Head of HMIC, Sir Tom Winsor (who has met with the Commissioner in the company of an HMIC Staff officer). The PCC awaits the outcome. Any arrangements for external scrutiny providing the assurance of independence, or of an appeals process, regarding HMIC are similarly unclear at the time of writing and are not detailed on the HMIC website.

### **OPCC Policy procedures and Governance**

The “Transparency” section on the OPCC website addresses the arrangements that are in place to ensure that relevant law is complied with by the Commissioner and to ensure that internal policy and procedure is observed and communicated to our stakeholders and the wider community.

The legal role and policy responsibilities of the PCC are set out within the following legislation and statutory guidance:-

- The Police Reform and Social Responsibility Act 2011
- Police (Complaints and Conduct) Regulations 2012
- The Policing Protocol Order 2011
- The Police and Crime Act 2017 (S.4)
- Elected Local Policing Bodies (Specified Information Order) 2011 (as amended)
- The IPCC Statutory Guidance

The PCC holds and maintains a number of key policies that provide the framework within which Commissioners are able to carry out their legal and mandated duty, as set out within the Police Reform and Social Responsibility Act

2011, in line with Elected Local Policing Bodies (Specified Information Order) 2011 (as amended).

Public accountability for the delivery and performance of the police service is placed into the hands of the PCC on behalf of their electorate. The PCC draws on their mandate to set out and shape the strategic objectives of their force area in consultation with the Chief Constable. The PCC cannot direct operational policing.

The PCC is, therefore, accountable to the electorate and the Chief Constable is accountable to their PCC. The Police and Crime Panel for Bedfordshire is empowered to maintain a regular check and balance on the performance of the PCC in that context and this will include the extent to which the PCC has communicated the policy that will apply to the OPCC and that which relates to Strategic Financial Governance of the Police Force, management of complaints, the recording of decisions, records management and the handling of qualifying disclosures.

This document sets out the strategy for doing so.

**Appendices and website links included in this document:**

[PCC One Year On 2017/2018](#)

[Project Boost the Frontline](#)

[Bedfordshire PCC Grant Funding 2017/2018](#)

[Bedfordshire PCC FOI Procedure](#)

[Bedfordshire OPCC FOI Process Guidelines](#)

[Bedfordshire Police & Crime Panel](#)

[Bedfordshire OPCC Complaints and Comments](#)

[Bedfordshire OPCC Complaints Policy](#)

[Bedfordshire PCC Newsletter](#)