

Written evidence submitted by the
Association of Police and Crime Commissioners (COR0192)

1. Introduction:

- 1.1. This submission is made by the Association of Police and Crime Commissioners (APCC), on behalf of Police and Crime Commissioners (PCCs) in England and Wales. It summarises responses from several Office of Police and Crime Commissioners (OPCCs) reflecting on the Covid-19 restrictions and the impact of these on the policing response. This includes a number of PCCs whose force areas are currently subject to Tier 2 or 3 lockdown restrictions. A list of OPCCs who submitted responses is included at the end of this document.
- 1.2. While this response has been developed with the input of PCCs, it does not seek to reflect the views of all APCC members; PCCs have additionally been made aware of the Inquiry and have been invited to contribute individual submissions.

2. Preamble:

- 2.1. The APCC is the national body which supports Police and Crime Commissioners and other local policing bodies across England and Wales to provide national leadership and drive strategic changes in the policing, criminal justice and wider community safety landscape, to help keep our communities safe.

3. The restrictions and how they were introduced.

- 3.1. PCCs recognise that government needs to act quickly to respond to Covid-19 and that this creates challenges for consultation on restrictions and other measures. However, this is putting forces in a difficult position. PCCs reflected on instances where rules and guidance were not practically available to them until after they had come into force which made it difficult for them to prepare for the introduction of restrictions. The quick implementation of new restrictions meant there was little time to prepare communications for the public, officers and staff. As clear messaging is an important factor to success this has proved challenging. Nevertheless, PCCs say that guidance from the NPCC and College of Policing, once available, has been effective in supporting the operational implementation of restrictions.
- 3.2. In short, it is accepted that extended consultation is not possible due to the pace of change and need for decisive action to control the spread of this virus. Nevertheless, engagement around the practicalities for policing could have been better, and it is hoped this will improve over the winter months and into the new year.

4. Any challenges in policing the restrictions.

- 4.1. There has been a significant and well-documented financial impact on forces of policing the Covid-19 restrictions. Forces incurred additional costs in operationalizing the Covid-19 response, maintaining business as usual and procuring personal protective equipment (PPE). We have welcomed the recent assurance from the Home Office that they will reimburse the full costs of medical-grade PPE, and continue to liaise with Home Office

officials on additional funding for non-medical grade PPE, face coverings and logistics relating to the storage and distribution of PPE across the policing system.

- 4.2. We would also note the impact on the police workforce of policing the Covid-19 restrictions, including increased officer overtime and rest day working, both of which have to be balanced against officer welfare and resilience considerations. The current restrictions do not restrict travel like the previous lockdown, and there has not been the same marked decrease in certain types of crime. This means that forces are dealing with a higher level of non-Covid demand now and are unable to reallocate resources in the same way as they did before to support the Covid-response or provide the same highly visible policing presence.
- 4.3. There is a particular need for clarity about how restrictions will apply to a number of impending events: notably Halloween, Remembrance Day and Bonfire Night. Policing events held to mark these could place further strain on an already over-stretched policing resource which will need to be considered and planned for.

5. Relations between forces and local government, in regard to restrictions.

- 5.1. PCCs have reported good relations with their local partners, drawing on well established relationships. Regional agencies are felt to have come together proactively and constructively to engage with and implement local restrictions in the interests of public protection and wellbeing.
- 5.2. Local Resilience Forums (LRFs) are multi-agency partnerships established by the Civil Contingencies Act 2004 to assess risk and produce emergency plans to prevent, mitigate and manage the impact of serious emergencies on their communities. The statutory membership of LRFs is made up of the emergency services and other key agencies with a role in emergency response. Neither PCCs nor OPCCs are statutory members, although it is within the discretion of LRFs to involve them either as members or observers. A recent APCC 'Call for Evidence' suggested there is considerable inconsistency in the approach of LRFs to PCCs and OPCCs. While many PCCs/OPCCs are satisfied with the way LRFs are working locally, others have found it challenging to engage and secure representation on their LRF; a majority of those responding to our Call for Evidence favored a review of law and/or guidance to address the role of PCCs/OPCCs (with most feeling it was most appropriate for PCCs to be represented by their officers on LRFs given their operational focus).
- 5.3. PCCs who have fed into this response to the HASC reflect that LRFs have been effective in supporting joint working between key agencies, local government, and forces to develop their responses to restrictions. In Thames Valley, for example, LRF structures provided a forum for differing interpretations of an appropriate response to VE day celebrations to be discussed and a shared approach developed.

6. How forces have overcome challenges to maintain the 4 E's approach, and their relationship with the public.

- 6.1. The 4 E's approach is generally felt to have been an effective method for policing the Covid-19 restrictions. Some forces appear to have focused on the first 3 E's, with enforcement used only as a last resort, and there are clearly anxieties about the longer-term impact of

the use of enforcement on community relations. In Durham, for example, a low-key approach to enforcement was felt to have worked well with low numbers of FPNs issued and a high level of public confidence in the policing response, as measured using several methods by both the PCC office and the force.

- 6.2. Both forces and OPCCs have undertaken significant communications work to inform and educate communities. In many force areas, virtual engagement sessions have been helping to highlight changes in legislation and to provide guidance and reassurance.
- 6.3. Public satisfaction regarding the policing of restrictions appears to have generally been high. For instance, interim results from the quarterly Police and Crime Survey (September/October fieldwork) indicate that overall satisfaction with Nottinghamshire Police's response to Covid-19 restrictions has been positive (53% satisfied, compared to 10% dissatisfied).
- 6.4. There are concerns among PCCs/OPCCs that a strong reliance on enforcement may negatively impact police/public relationships, and about the real risk of 'Covid fatigue' among communities who have been living with restrictions for a significant period of time.

7. The impact of greater restrictions during winter on the level of domestic abuse.

- 7.1. PCCs are, of course, responsible for commissioning support services for all victims of crime, including victims of domestic abuse.
- 7.2. Previous experience suggests that winter, and particularly Christmas, will see an increase in domestic abuse, raising concerns about the potential impact of restrictions during a period where risks to victims are already high.
- 7.3. While we expect domestic abuse has increased during lockdown, it is difficult to determine the precise impact, as this is a 'hidden harm'. In addition, some of the normal mechanisms for detecting abuse have not been operating in the normal way in this period – for example, it is less likely to have been picked up in community services, schools and hospitals. Normally victims may take time to feel confident to report an offence, and the more limited opportunities for reporting caused by the previous lockdown are likely to have reinforced this. An accurate picture of the impact of restrictions on domestic abuse may not be available until next year, partly given the delay in victims coming forward and presenting to Police or support agencies.
- 7.4. However, there are early indicators that support the concern among PCCs that increases will have occurred and victims will have found it more difficult to access support. We know from national survivors' surveys that 6 out of 10 women still living with their abuser have reported worsening abuse. In the West Midlands, reported domestic abuse cases are up 35% year-to-date, and in Nottinghamshire both the police and DSVA helpline saw a marked increase in reported incidents, often coinciding with the various phases of lockdown. Our knowledge of the risk factors for domestic abuse strongly suggest that the ongoing emotional and financial impacts of further restrictions increase the risks to victims too.

- 7.5. There is also evidence of changing patterns of domestic abuse which appear to reflect the impact of Covid-19 restrictions. For instance, in Essex there was around an 8% increase in reported incidents against current partners but a 16% decrease in reported incidents against ex-partners
- 7.6. Significant challenges remain in dealing with this offence during the winter months given the added impact of Covid-19, these include:
- Limited availability of refuge spaces, as highlighted by the March lockdown - these issues persisted even when lockdown restrictions were lifted with the national 'Routes to Support' system reporting that 70% of referrals for refuge were being declined due to lack of capacity;
 - Concerns about discontinuation of emergency MoJ funding for victim support from 31 October 2020 – while this funding has been welcomed by PCCs, the expectation is that the impact of Covid-19 on victims will persist for some time yet, and further additional funding for support is needed; and
 - the challenge of ensuring digitally excluded victims are identified and supported, as opportunities for outdoor engagement are curtailed by the colder weather.
- 7.7. PCCs will continue to work with local partners to ensure support is available to victims, and we will continue to work with Government to highlight and address the likely long-term impact of domestic abuse exacerbated by the Covid-19 pandemic. We also note the work that has been led locally by PCCs to develop innovative approaches to identifying, engaging and supporting victims of domestic abuse, which we will continue to build on (see the APCC In Focus publication on Protecting the Vulnerable during the Covid-19 crisis here).

Responses received from:

- Durham
- Thames Valley
- Essex
- Bedfordshire
- Welsh Commissioners
- North Yorkshire
- Nottinghamshire
- West Yorkshire
- West Midlands
- Leicestershire
- Greater Manchester
- Northumbria
- Cleveland

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