



Devon & Cornwall
POLICE

Police Headquarters, Middlemoor, Exeter, Devon, EX2 7HQ

📞 101 Non-urgent

📞 999 in an emergency

🌐 www.devon-cornwall.police.uk

📧 101@dc.police.uk

📘 [DevonAndCornwallPolice](https://www.facebook.com/DevonAndCornwallPolice)

🐦 [@DC_Police](https://twitter.com/DC_Police)

📺 [dc_police.999](https://www.youtube.com/channel/UCdc_police.999)

📺 [DCPolice](https://www.youtube.com/channel/UCDCPolice)

6 April 2023

Mr Andrew Cox
HM Senior Coroner for Cornwall
and the Isles of Scilly
The New Lodge
Penmount
Truro TR4 9AA

Dear Mr Cox

INQUEST INTO THE DEATH OF DANIEL TILLEY

I am writing in relation to the above inquest and, specifically, the Regulation 28 report to prevent future deaths that you have directed to the Chief Constable following the conclusion of the inquest hearing.

Firstly, I want to take this opportunity to both express my personal condolences and reiterate those previously offered at the inquest on behalf of Devon and Cornwall Police, to Daniel's friends and family for their loss.

Secondly, I would like to pass on the Chief Constable's sincere gratitude to you for proactively extending the usual 56-day period in which to respond to the Regulation 28 report. I understand that this was in part in recognition of the fact that, at the time of the conclusion of the inquest into Daniel's death, the Chief Constable had not started work with Devon and Cornwall Police. Whilst he is unable to write this response to you personally, he is thankful for your generous approach in this respect.

Finally, I am grateful to you generally for bringing the matters of concern raised in the Regulation 28 report to my attention. I welcome the opportunity to reassure you that we have very seriously and carefully considered what we can learn from Daniel's death with a view to improve the service that we provide to the public. If you have any queries or concerns arising out of this response, then I would welcome discussing these with you.

I will use the remainder of this correspondence to respond to the matters of concern set out in the fifth box of the Regulation 28 report.

Staffing levels in the CMCUs in relation to the workloads experienced

Staffing levels

As was highlighted in the evidence given at the inquest, the reasons for the demand in the CMCU are multi-factorial. The reasons include shortages in staffing numbers as a result of ongoing recruitment challenges and high staff turnover, high sickness absence, in addition to associated challenges with facilitating training, limitations of outdated computer systems, and lengthy processes and procedures.

The force has produced a 'road map' which is scrutinised through our governance processes and His Majesty's Inspectorate of Constabulary and Fire & Rescue Services ("HMICFRS"). This includes our plans to improve our Contact provision, i.e. how we address and respond to incoming contact requesting assistance from the public.

As of January 2023, we have 138 Radio Dispatch Officers (now called Resource Incident Management Officers (RIMOs)) against a design of 143 and 191 Contact Officers against a design of 194, which represents an increase in staffing levels since the inquest. These staffing levels were identified by reference to a review by BT, an independent consultant who examined our processes and staffing numbers (as previously shared in the inquest).

We opened a further recruitment campaign in January 2023. Further campaigns are scheduled and are due to take place until retention is stabilised.

The uplift in numbers will enable the force to answer emergency and non-emergency calls within adequate timeframes.

In addition, the RIMO role has been regraded through a job evaluation process and a salary increase awarded which we anticipate will assist with retention. During exit interviews upon leaving the organisation, our outgoing staff have previously raised the issue of pay as one of the reasons for leaving the police.

New software and technological changes

As you have referenced in the Regulation 28 report, evidence was given at the inquest outlining that new software was to be implemented in the CMCU with the aim of improving the Contact provision to the public.

The first new system, NICHE (a comprehensive records management system) was introduced in November 2022. The second system, Single Online Home, was introduced in March 2023. The third system AACC7, is now expected to be introduced no later than May 2023. These new systems will reduce duplication - currently officers and staff have to double key a lot of information and update information manually on various systems, which slows down process times and moving information around the Contact Centre. The new systems will also improve process times and automate in part, leading to better public service delivery and answering calls.

Our current email contact channel provides the public an opportunity to send in information in a 'free text' format. This has changed with Single Online Home, where any submissions from the public will have to be presented to us in a more structured manner. This will allow queries to be answered more efficiently and directed to the most appropriate area of the organisation and it is the hope that it will avoid follow up calls from the public to the CMCU to get the right information.

AACC7 will allow us to introduce call backs to the public, which will reduce the number of abandoned calls to our 101 service because individuals will not have to wait on the phone line. We will be able to have a single voice queue which will improve 101 answer times. These advancements will support CMCU staff in their roles.

In addition, we have been introducing leaner processes to improve clarity of responsibility in turn leading to less time spent on calls and follow up work.

Other improvements to the management of communication with the public

While this does not directly address the specific concerns that you raised in the Regulation 28 report, I would also like to take this opportunity to outline changes to our practices that have been made in relation to how we manage contact to and from the public, as these changes will also serve to ease the pressure on the CMCU.

The changes and improvements are as follows:

- The force is working to understand the data behind abandoned calls; for example, whether abandoned calls represent the public abandoning calls altogether, or whether they represent the public moving to a different method of contact that provides a quicker response (such as a 101 call or web chat).
- Some management of incoming contact from the public has moved from Contact to local basic command units (BCUs – basically, local policing areas) to free up RIMO time to take 999 calls.
- We have increased our focus on maximising the wellbeing of our staff and the support offered to them. We have dedicated Human Resources provision in place to provide enhanced support for individuals through: effective people management; increasing effectiveness of early interventions for absences to avoid unnecessary escalation; effective and timely use of workplace adjustments; empower and increase the confidence of our managers; and potentially an increase in informal performance management processes should managers not undertake their responsibilities effectively. This is with the overall aim of improving performance and retention and thus contribute to an improved service to our communities. Since the introduction of this team in October 2022 sickness levels have reduced from 15% absence rate to 11% in January 2023. This is particularly important to the CMCU as high stress levels was another factor highlighted in exit interviews as a reason for staff leaving the organisation.

- We have also reviewed (and will continue to review) the shift patterns to ensure we have more staff working in peak demand hours. In particular, the Incident Resolution Centre (IRC) moved to a new shift pattern as of January 2023. The IRC role is one of managing demand; the team undertakes crime-related tasks and crime screening, with the effect of reducing repeat calls to the organisation and the early resolution of complaints, allegations, and incidents. A new shift pattern has also been agreed for contact handlers and will be implemented in line with the Police Staff Handbook, which we anticipate being implemented in July 2023.
- An independent review was carried out in September 2022 by Sopra Steria, who are an external technological consultant. The purpose of this work was to review Contact processes so the force could become more efficient, to better utilise resources and enable people to work more effectively, therefore providing a better quality of service to the public across different methods of contact (for example: 999, 101, email and webchat). Sopra Steria identified process improvements which are now being reviewed with a view to improve our service delivery. These external consultants provided support to understand, by reference to the wider call centre industry, what further process improvements and areas of development should be pursued alongside our ongoing work in this area. Since that work was carried out, process reviews have been undertaken concentrating on areas such as missing people, requests made by the public under Claire's Law and Sarah's Law, and domestic abuse. This resulted in nine of our processes being streamlined to improve public service.
- The introduction of a new enhanced leadership team in September 2022 has been leading reviews on recruitment and retention, demand reduction, daily performance, staff engagement and sickness absence.
- We have an in-depth performance framework that provides focus for the team to achieve good quality service and drive performance standards.
- We introduced a Demand Reduction team to identify repeat and vulnerable callers. In addition, this looks to reduce contact from persistent / nuisance callers, utilising partnership work, civil orders, and prosecution where appropriate to reduce this demand. We have seen a similar issue occur with digital contact: for example, one member of the public with mental health issues emailed the force 3,000 times in August. We now have processes in place to help reduce the demand caused by persistent / nuisance emailers.
- We are also conducting a training review to ensure staff are receiving the right training and consistently using the knowledge and skills that this training provides. This will include refresher training on preservation of evidence and crime prevention advice as highlighted by the HMICFRS. This took place in February 2023 and further refresher training is to take place in April 2023.

- We have also invited other forces who demonstrate good quality service in this area to work with us. This includes Humberside Police who undertook a peer review in December 2023. Recommendations highlighted the areas we were focussing on and confirmed our improvements were in the correct areas.
- Finally, we opened an additional six front offices in our police stations in January 2023 (in Tiverton, Truro, Falmouth, Penzance, Newton Abbot and Bude) increasing the provision of front office services. This enables a better service to the public by providing greater connectivity and accessibility. The front office staff will be trained to deal with digital demand and non-urgent contact demand, supported by new technology, significantly expanding the available resource base for Contact.

We hope that this provides you with some further reassurance in terms of the demand being placed on the CMCU.

The adequacy of the number of uniformed police officers available to respond in a timely fashion to the demand seen over the summer months

General position

In the first instance, I would like to place this part of this response to the Regulation 28 report in what I hope will be helpful context.

As was also highlighted in the evidence given at the inquest, the reasons for the surge in demand (and impact upon uniform officer numbers available to deal with that demand) during the summer period are based upon several factors.

Devon and Cornwall Police define the summer period as being between 24 June and 2 October. The summer period poses a significant and unique challenge to Devon and Cornwall Police, within a policing environment impacted by geography, tourism, and summer demands. Historically we have seen an increase in crimes and incidents during the summer months that can result in increases in demand of up to 15%.

By way of illustrating this, the force has:

- 4,000 square miles, making it the largest geographic police force area in England.
- 730 miles of coastline, 5 inhabited islands and 13,600 miles of road.
- Rural areas comprising 85% of the entire area.
- A huge mainland policing area: 149 miles long, which is half the distance from Land's End to London.
- A 1.76 million resident population, with 59% living in rural areas.
- 6% of areas falling in the most deprived areas in England.

- 24% of residents aged at least 65 years old (the national average is 18%).
- Been an outlier nationally on mental health hospital admissions.
- The second highest level of tourism in the country behind London.
- A 7% increase on our base population in the summer period, which is the highest in England and Wales. This equates to 125,000 extra people each day if spread across the whole year.
- Long travel times – for example, a journey from Launceston to the nearest custody centre (in Newquay) is a 40-mile round trip for officers with a prisoner.

Devon and Cornwall Police are funded at a rate of 55p per day per person in the force area, compared to the average in England and Wales of 58p (HMICFRS 2022). Almost a third of the force's annual overtime budget is spent within the summer policing period.

Demand since summer 2019

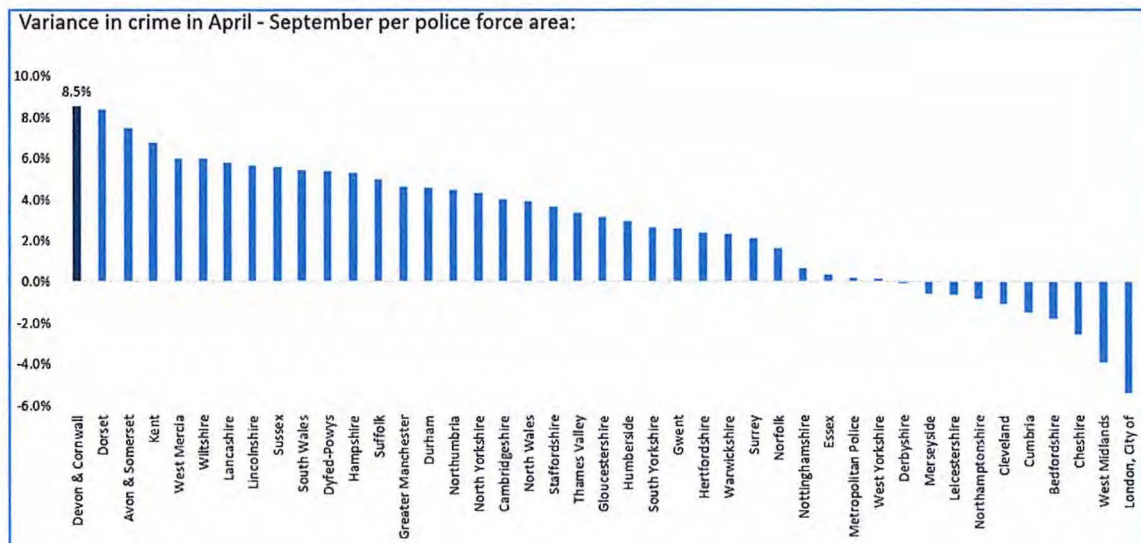
Since summer 2019, recorded crime in the Devon and Cornwall Police force area has risen by 7.8% - representing an additional 2,294 crimes.

The position in terms of contact from the public can be summarised as follows:

- Overall demand is lower compared to 2019; however, demand is much higher across emergency and priority call lines.
- During summer 2022 there were 308,900 total calls for service, which is a decrease of 4.3% on the previous year; however, emergency 999 calls (98,910 calls in total) increased by 24.8% (19,658 calls).
- 101 calls received were down by 28.3% (53,528 calls); however, the 101 alternatives (email, text and webchat) rose by 51.4% (with 20,100 instances of contact).
- The number of incidents reported to the police has decreased by 9.2% since summer 2019; however, this is a more complex picture with incidents involving vulnerable people (such as people with mental health issues) increasing by 20.2% (679 incidents), the volume of incidents closed with a crime recorded against them increased by 10.6% (1,235 incidents) and the proportion of incidents attended within time tolerances (response times) has decreased across all response types compared to summer 2019.

We have more recently relied on pre-pandemic data due to the large variations in demand experienced during and post-pandemic. Last year for example we saw an unusually large increase (18% across the whole summer but peaking at 24% in August) in demand compared to the winter months October 2021 to March 2022. It is still not clear whether these increases will be maintained into the future. Our summer contingency planning assumptions are based on pre-pandemic figures but adjusted for most recent experience.

It is also worthy of note that Devon and Cornwall Police has the most extreme variance between summer and winter policing demand of any force in England and Wales, as the following graph hopefully illustrates:



Changes to Devon and Cornwall Police’s approach to the summer period

From 2020 onwards, a number of changes and improvements have been implemented to try and alleviate the pressure on the force during the summer period.

The Police workforce is set in relation to funding and currently stands at 3,611 police officers, 154 police community support officers (“PCSOs”) and 2,249 police staff. Since 2019 the force has benefitted from an increase of 491 police officers as a part of the national police uplift programme, i.e. the government’s programme to recruit more police officers. In relation to Newquay, an uplift of four uniform officers was made by the end of 2019 to uniform response, plus an additional dedicated Neighbourhood Beat Manager (police officer) post.

Crucially, the Office of the Police and Crime Commissioner (“OPCC”) has made additional funding available (£400,000 per year since 2020) to the force during the summer which has been allocated in line with the demand on the different areas of the organisation and in accordance with risk assessments carried out in relation to the summer period.

This has enabled the force (with its partners) to implement some new practices and approaches to try and improve capacity and our performance and ease demand during the summer period. These include:

- The creation of an investigative support group. This will represent a number of investigators who can be deployed dynamically / urgently to support investigations.
- Additional CCTV is now available (as a direct result of the additional funding from the OPCC).
- Domestic Abuse Safeguarding Cars are in place in Plymouth and Cornwall during the summer. The dedicated unmarked vehicle will see an Independent Domestic Violence Advisor (IDVA) and a plain clothes police officer deployed together to the scene of reported domestic abuse. This will provide an immediate response to incidents of domestic abuse at the most critical point to provide the best support to victims, while enabling officers to gather quality evidence and to provide a thorough risk assessment.
- Additional funding for Victim Care.
- Online consultation with victims is now possible via the GoodSAM application, which also allows those calling the police to instantly share their location and live video.
- Further volunteers and Special Constables have been taken on.
- A multi-agency response is now in place to try and assist people with mental health issues. Dedicated vehicles are in multiple areas eight hours a day to respond to people in crisis by providing early intervention and proactive support.
- E-bikes are to be provided across the force for neighbourhood teams.

We have also undertaken a lot of work in relation to how we deploy our resources, to again try and improve our performance during the summer period.

Force resource allocation is based upon an industry standard resource allocation model. This modelling has been enhanced by Devon and Cornwall Police over several years to take into account a range of factors including demand, absences, abstractions, average time spent dealing with each crime type and other performance factors.

The model is based upon the average demand over the past five years and gives an output of officers required per BCU to maintain a '24/7' response. The data and professional judgement are then used to finalise the resource allocation locally to consider local needs and set levels of uniformed police officers. Local planning within BCUs takes place weekly to ensure officer numbers are met on sections on a shift-by-shift basis.

This does mean that daily resourcing is based upon average demand rather than summer demand. Therefore, at peak times such as the summer officers will inevitably, at times, be stretched in terms of capacity. To mitigate this challenge a focused summer policing response is put into place – Operation Marnow – which enables the central coordination of resources using a flexible approach to resourcing across all departments to meet threat, risk and demand on the front line. (See below).

Operation Marnow represents the Devon and Cornwall Police response to the increased demand in the summer period. It ensures the coordination of resources with a full command structure in place. This ensures appropriate prioritisation of resources, a consistency of approach and a flexible response to demand / threats. It is headed by a Gold (Strategic) Commander at chief officer level and Silver (Tactical) Commander at chief superintendent level. Weekly coordination meetings are held, with these chaired by the Silver Commander to bring together leads from all key areas of the organisation.

During the summer period, the force’s tactical planning is heavily focused on flexibility and contingency planning, to account for the fluctuating nature of the demands on the force. Planning across the force is assessed by reference to a grading system which classifies demand as green, amber, red or black. This is illustrated in the following table:

| RAGB | Criteria |
|--------------|---|
| Green | Policing services demand is within standard deviations. Whilst there may be some fluctuation creating minor impacts these are understood and can be absorbed through usual policy and procedure. |
| Amber | Policing services are experiencing moderate impact. There are some occasions where demand is exceeding capacity. There is a requirement to increase capacity in order to meet on going demands and calls for policing services. |
| Red | Policing services are experiencing severe impact. There are many occasions where demand is exceeding capacity. The number of unattended calls for services is extremely high. The number of deferred incidents are growing. Demands on policing are at a level where Business as Usual (BAU) cannot be sustained. |
| Black | In order for the force to meet local and national requirements, local services must be restricted to events relating to ECHR article 2 rights. |

The force’s contingency plans in relation to demand, deployment and crime allocation policies have been refreshed and quality assured. This enables the force to take a proportionate approach when demand reaches critical levels, and it also allows the force to consider potential early activation of contingency plans to negate other organisational or service risks. An example contingency plan is to stop all training.

Every area of the organisation has undertaken reviews of their continuity plans, which are now in place. Alongside ‘tipping points’ in respect of demand and performance, i.e., the point where the force’s ability to provide policing services is adversely affected, the weekly coordination meeting tracks our continuity plans, particularly in respect of demand and personnel absences.

An existing annual leave restriction is in place, with uniformed officers limited to two weeks of annual leave in the summer period. Force resources are rostered to cover key events and the August bank holiday weekend.

A 'Tipping Points' QlikSense (data visualisation tool) application has been developed and proved to be a useful tool to identify critical thresholds in crime, anti-social behaviour, and domestic abuse demand. This was used to good effect by Operation Marnow Silver meetings to inform discussion about demand across the force and identify geographic areas that were facing the greatest challenges.

Last year a focused effort to reduce backlogs in routine demand saw attendance at routine incidents hold steady at above 80% attended within 48 hours, despite the increase in calls for service over the summer. While the percentage responded to within threshold remained below 2019 levels it was higher than 2021.

The Gold Operation Marnow approach to tackling the challenges (and especially issues of backlogs and workloads) saw improvements in our routine demand response times and a relative flattening of the increasing trend in workloads.

We have also increased our focus on the welfare of our personnel and several wellbeing initiatives are implemented during the summer focusing on four key areas: financial vulnerability; physical fitness and health: diet, nutrition, and psychological health; and caring and dependents responsibilities. It is our hope that this will increase our resilience as an organisation during the summer period. Despite the pressure on officers and staff, absence rates in the last summer period remained close to 2019 levels suggesting a positive impact on staff wellbeing of effective management of the issues.

Finally, we have a process of recording and implementing learning from each summer period, which includes the formal provision of personnel feedback and bespoke feedback sessions with those in key roles, which is taken into the next planning phase.

The force and OPCC have provided a significant amount of evidence on the impact of the demand increases on our ability to respond to the Home Office both in support of a special grant and more recently in support of the modelling being done to revise the police core grant funding allocation formula – the means by which the Home Office determine how much of the core grant is allocated to each police force.

I hope that this provides you with some reassurance that, while the summer period remains a difficult and challenging time in terms of the demand on Devon and Cornwall Police, we are working hard to do what we can to alleviate the associated pressures.

Yours sincerely

A large black rectangular redaction box covering the signature of the Acting Chief Constable.

Acting Chief Constable