

OPCC RESPONSES TO COMMISSIONING FRAMEWORK CONSULTATION COMMENTS 2014

COMMENT		RESPONSE
GENERAL		
1	How can initiatives be mainstreamed if they prove to be successful?	The pilot referred to was in relation to an operational policing initiative. Ongoing funding would therefore need to be mainstreamed into core Police budgets. In relation to PCC Grants, those organisations who have received a PCC Grant for 2014/15 will be able to apply for funding for a 2 year extension, subject to being able to meet the revised criteria and evidencing satisfactory performance.
2	It is unclear how the funding splits have been allocated.	Funding of many of the commissioning intentions has historically come through a number of routes, in particular from the Home Office via: <ul style="list-style-type: none"> • The Community Safety Grant • The Drug Intervention Project Grant (DIP) • The Youth Crime and Substance Misuse Grant • The Community Innovation Fund • Positive Futures Programme • Communities Against Guns, Gangs and Knives Programme • The Safer Communities Fund The majority of these services and initiatives continue to be supported by the PCC at the same financial level. The funding in relation to victims and witnesses will be provided to the PCC by the Ministry of Justice using a formula based approach.
3	Why is funding for the voluntary sector not available for 3 years as it is for statutory bodies?	Funding to the voluntary sector via direct and co-commissioning processes has been agreed for the 3 years to March 2017. Subject to the availability of funding any new services will also be commissioned until March 2017. PCC Grants will be available for a 2-year period subject to clear evidence of previous successful performance.
4	Concerns that cuts in funding from other statutory partners may impact on the delivery of the Police and Crime Plan.	The Commissioning Framework outlines how the commissioning budget will be used to support the delivery of the strategic priorities within the Police and Crime Plan. The commissioning budget is not available to fill funding gaps which result from the decommissioning of services or discontinuation of funding by others.
5	Welcomes the simplified commissioning framework that makes further use of existing commissioning arrangements.	None required

6	Suggestion that persons residing in rural locations should be classed as a vulnerable group due to: <ul style="list-style-type: none"> • the lack of proximity to services, including policing; • rural locations being quiet and remote; • lack of street lighting. 	The comments made do not relate to the Commissioning Framework. The suggestion that persons living in rural communities should be considered as a specific vulnerable group and their policing reflected in Strategic Priorities within any revision of the Police and Crime Plan will be considered in the next consultation on the contents of the Police and Crime Plan.
7	Document is helpful and could be incorporated into City Council's Guiding Principles document.	None required.
8	Easy to understand and made the whole commissioning process a lot easier to follow.	None required.
9	Overall, this commissioning approach is to be welcomed.	None required.
10	Suggestion that independent monitoring of the social impact of projects and service providers should be introduced.	The requirement for Social Return on Investment information has already been built into some of the PCC's larger contracts. Consideration will be given to extending this for other commissioning intentions.
11	Welcome the changes that you are proposing and is happy to support these changes.	None required.
12	This approach in terms of indication and funding envelope for the next two years is welcomed, the approach provides officers with an early opportunity to plan and co-ordinate projects & initiatives which invariably involve both internal and external partners and need a great deal of work to ensure success.	None required.
13	In funding projects/ initiatives using the "direct" mechanism for commissioning, the OPCC will need to be clear as to the scope and remit for the allocated funding in order to aid planning.	The majority of direct commissioning intentions are already in place and being managed through agreed contracts. All new procurement will require a clear service specification and performance framework.
14	Simplification of the Commissioning Framework into a single document is welcomed.	None required.
15	Direct commissioning over a three year period makes sense and allows for planning and delivery over the longer term.	None required.
16	The need to provide performance updates and to remain outcome focused remains a relevant condition of funding received.	None required.
17	There is a concern that with the proposed changes in policing resources, there will be a decrease of resources	The Force policing model heavily factors in community need around threat and harm in the way that neighbourhood policing resources are allocated

	from the Police to support local intentions and activities to achieve outcomes outlined within PCC applications.	and deployed. It is similar to the way that the commissioning intentions aim to align resources with need. The model also means that these same neighbourhood teams will have more, not less, capability to address local problems because they won't be investigating a caseload of crimes or carrying other abstractions in the way they are doing now. Neighbourhood policing has been and remains at the heart of the Force's policing philosophy and new policing model.
18	We welcome that the framework has been simplified into one document and that service provision will now be delivered through three year contracts.	None required.
19	Welcome the continued emphasis on streamlining and simplifying the commissioning processes.	None required.
20	Harnessing local commissioning expertise has to be the way forward in terms of providing added value and to avoid duplication of effort.	Agreed.
21	Acknowledge the challenge that the OPCC faces in implementing an outcome based approach.	None required.
22	Appreciate the commitment to work with local commissioners to develop performance indicators and measures that can be easily managed and reported upon – it's critical given the ever changing strategic landscape nationally and locally.	Agreed.
23	It seems that the learning and experiences of the first year are being applied to the framework in a gradual, pragmatic and measured way.	None required.
24	Some suggested amendments to reflect the merger of criminal justice commissioning with the wider Substance Misuse Commissioning Board.	Amendments made.
25	Welcome that the framework has been simplified into one document and that service provision will now be delivered through three year contracts	None required.
26	No hesitation in supporting the broad thrust, particularly in relation to the four themes	None required.
27	Some reservations about the potential to secure outcomes in 'making communities and neighbourhoods safer'. The outcomes must be sustainable. The MCN theme is	Agreed.

	fundamentally important and an accepted part of the Police modernisation programme of service delivery and hence its consolidation is a high priority.	
28	Confident that the overall Commissioning Framework structure will contain relevant performance indicators so that any agreed interim and concluding audits will confirm compliance with objectives and outcomes.	All contracts/agreements specify performance measures for monitoring purposes and include details of how the PCC will manage any instances where the outcomes are not being achieved.
PCC GRANT		
29	In terms of the PCC grant applications the CSP recognises that funding must be targeted in areas of greatest need but there must be flexibility to address emerging local issues outside of these areas.	The Partnership Locality Fund provides all Community Safety Partnerships with the flexibility to respond to emerging local issues.
30	The Partnership is agreeable with the changes to the maximum value for the PCC Grant which is common practice.	None required.
31	There is general support for the PCC Grant being available to community and voluntary sector organisations to support the achievement of specific commissioning intentions and related outcomes in identified hotspot locations. However, there is concern that the funding is limited to the City and the Borough of Charnwood. We understand the reference to the Police's Strategic Assessment however it should be noted that other areas have hot spot locations, relative to their area and it would be worth considering making a sum available for these localities.	It is anticipated that Community Safety Partnerships will identify hotspot locations and include actions within their Delivery plans to address them. The OPCC is happy to support the use of PLF allocations for this purpose.
32	The proposal to only offer PCC grants for applications which 'focus specifically on increasing the number of offences reported' is of concern - It would not be appropriate for agencies to steer all victims towards reporting to the police; rather, we consider that our remit is to ensure that victims are fully informed of their options and that if they wish to seek justice through the criminal justice system, they will be empowered and supported to do so.	The Police and Crime Plan has a strategic priority " <i>to increase reporting of serious sexual offences and ensure a positive outcome for victims and witnesses of serious sexual offences</i> ". It is accepted that not all victims will choose to report offences to the Police but it is hoped that focussed work to increase confidence and the victims' experience will help to encourage reporting.
33	With respect to the PCC Grant only being made available to Community and Voluntary Sector Organisations by definition excludes public agencies. This may well be viewed as a negative step as public agencies may wish to	The majority of public sector agencies are key partners on the Community Safety Partnerships. Therefore they can develop collaborative initiatives within the CSP Delivery Plans and as a result utilise the PLF allocation.

	put in place initiatives that have a positive impact on the Crime and Police Plan but are unable to do so through lack of funding. Allowing public agencies to apply for funding through the PCC Grant could be considered in exceptional circumstances.	
34	The reduction of funding grants from £50k to £25k seems to be entirely reasonable given that most applications were below the £25k limit. Allowing for increased funding applications through match funding is a welcome development.	None required.
35	The partnership is agreeable with this change and in the original framework there was an emphasis on organisations identifying match funding for projects and initiatives.	None required.
36	In terms of the PCC grant applications the CSP notes that no hotspot locations have been identified in Blaby or Hinckley & Bosworth. The CSP would also like it noted that our combined area has more households than any other LPU areas identified with hotspots therefore more residents who potentially could be victims of crime such as domestic abuse, ASB and burglary. We would therefore wish to see the above data taken into account with regard to allocation of funding.	The PCC Grant is available to reduce anti-social behaviour in specific hotspot locations. The locations have been selected according to the number of ASB incidents, and not other crime types, as outlined in the Police Strategic Assessments for 2012/13 and 2014. This enables those areas with longer term anti-social behaviour issues to be prioritised.
PARTNERSHIP LOCALITY FUND		
37	Full support and welcomed change - The removal of the business case for specific initiatives made it very bureaucratic – and did not recognise the professionalism of the CSPs.	None required.
38	Putting the local CSPs at the heart of strategic commissioning and delivery is a positive demonstration of that principle.	None required.
39	Would welcome additional funding to Community Safety Partnership but recognise that allocations are based on population.	None required.
40	Locality funds aligning to the strategy will allow us greater flexibility. The priorities themselves align with our strategy quite well so there should be minimal impact.	None required.

41	We fully support the plan to work more closely through a locality model and the wish to fund initiatives and services in relation to local need.	None required.
42	We particularly welcome the annual review of CSP strategic assessments and feel this fits in well with the current frameworks we have locally that helps us deal with our annual planning.	None required.
43	The new PLF process is welcomed by officers.	None required.
44	The CSP welcomes the additional funding to be given to CSPs in recognition of the valuable contribution they make to the Police & Crime Plan. This will enable us to maintain key services and projects and now look into development areas.	None required.
45	We support this change as each year the CSP reviews its Community Safety Strategy in light of the strategic assessment and through consultation with our residents. As well as reviewing the strategy we develop action plans for the key priorities identified for the CSP. The action planning events normally start around December in order for the plans to be in place from 1 st April. We already have in place a performance framework which requires us to provide quarterly highlight reports to the CSP which are already shared with the OPCC.	None required.
46	Operationally, the OPCC will need to be clear in terms of their expectations for accessing the PLF, i.e. within the Commissioning Framework.	All requirements will be outlined in the PLF Guidance Notes.
47	Good news and should allow the Community Safety Partnership to plan delivery for 2 years and focus on what we want to achieve as performance will be held against the community safety strategy and it supports our strategic intentions. Locality funds aligning to the strategy will allow us greater flexibility. The priorities themselves align with our strategy quite well so there should be minimal impact.	None required.
48	The increased amount available to the CSP through the Partnership Locality Funding (PLF) is welcomed.	None required.
49	The new approach to the Partnership Locality Fund, for Community Safety Partnerships (CSPS) is particularly	None required

	welcomed. The increase from £330,000 to £450,000 is positive and will enable Partnerships to be more proactive in a climate of fewer resources.	
50	The requirement for CSPs to provide a copy of their 2015/16 Plan, together with a budget breakdown and performance framework rather than a requirement to submit a business case for specific initiatives is a sensible one, cutting bureaucracy and time. It means that CSPs will be required to prepare their action plans by January rather than March and allocate spend to each project within the action plan.	All requirements will be outlined in the PLF Guidance Notes.
51	It makes sense to increase the locality fund amount from £330,000 to £450,000. Community Safety Partnerships (CSP) are in a strong position to respond to local need and allocate this funding appropriately.	None required.
52	By using the locality fund to make a financial contribution towards delivery of CSP plans, the PCC's allocation will be combined with local partnership budgets to ensure better value for money. Actions plans are already developed and monitored by each CSP so this is an encouraging development to commissioning arrangements. We would however welcome sight of the performance framework at the earliest opportunity.	None required.
53	Submitting a CSP action plan will also give the OPCC the opportunity to review all CSP work carried out in a locality and not just that which he has funded as has been the case in the past. This will allow the OPCC to have a more comprehensive picture of all community safety work across LLR.	None required.
54	By not having to submit a business case to accompany each individual bid the administrative burden on community safety teams will be greatly reduced. This will free up more capacity to respond to emerging issues and trends and deliver initiatives.	None required.
55	Improved timelines for commissioning arrangements will support much stronger planning processes. Knowledge of funding arrangements well before the start of the new	None required.

	financial year will allow for finances to be considered alongside community safety strategy refreshes.	
56	Overall, the proposed changes to the 2015-2017 Commissioning Framework are generally well received as they are viewed as a genuine effort to reduce bureaucracy and to provide Community Safety Partnerships with greater certainty whilst requiring scrutiny through an appropriate performance framework.	None required.
57	The increase in funding is viewed as a welcome change as it recognises the value of Community Safety Partnerships in their contribution towards the Police and Crime Plan. The increase in funds available to CSPs will allay some fears around the future of funds available and provide a degree of certainty for the continuation of projects at the grass roots level.	None required.
58	Removing the requirement for Community Safety Partnerships to submit an individual business case for each individual initiative has been well received. CSPs will however need to bring forward their planning processes in order to meet the commissioning framework timescales. The requirement for CSPs to provide a budget breakdown and quarterly updates will not be viewed as a barrier to funding but as business as usual.	All requirements will be outlined in the PLF Guidance Notes.
59	An area that the partnership would like to highlight that we feel resources both physical and financial should be considered to dealing with emerging trends or threats that might arise that will not originally have been considered by any partnership and the OPCC due to the unforeseen nature of certain crime trends.	The BCU Fund was discontinued in 2014/15. Additional funding has been added to the Partnership Locality Fund (PLF) budget for Community Safety Partnerships. The PLF already has a contingency element of up to 10% which could be used to respond to emerging issues and this will be continued in 2015/16.
60	The discontinuation of the Basic Command Unit (BCU) funding is disappointing. The fund was extremely useful in reacting to emerging threats and issues and provided flexibility to CSPs when doing so.	As above
61	Wanted to raise the issue about there being no Basic Command Unit or contingency funding that CSPs can draw down on to put response plans in place should there be a spike in a particular crime.	As above

YOUNG PEOPLE		
62	The investment in a young people's mentoring service is welcome and the YOS will seek to engage with the provider to ensure that this service extends its reach to children and young people across the city that meet the eligibility criteria as part of an integrated response to early help identification and prevention strategy.	None required.
63	In relation to the money associated with the commissioning intention: Targeting young offenders with a substance misuse problem. It is proposed that this is directly commissioned with Leicestershire YOS rather than co-commissioned.	Agreed – amendment made.
64	The indicative funding to target young people with substance misuse problems for a two year period from 2015/17 is welcome and will assist with service continuity and planning with the current service providers.	None required.
65	We welcome the continued contribution to supporting a Youth Prevention and Diversion Pathway which targets two specific groups of young people: High Risk Entrants and repeat young offenders. However, it is important to note that a number of the allocations are being significantly reduced in 2016/17 which will impact on the ability to deliver against the expected outcomes.	None required.
66	The intention to enable young people to support and challenge the work of the PCC (CI025) is welcome.	None required.
YOUNG ADULTS PROJECT		
67	I welcome the addition of a specific commissioning intention relating to improving outcomes for young adults in contact with the Criminal Justice System (CI024 -To improve outcomes for young adults in contact with the criminal justice system, including securing reductions in offending and reoffending.)	None required.
68	The proposed allocation of £10,000 for delivery of the Young Adult Delivery Plan will assist greatly in enabling the implementation phase of the project.	None required.

69	I would also suggest that organisations/programmes that receive other areas of OPCC commissioning review their allocation of funds (where relevant) so that there is an appropriate focus on young adults (e.g. in IOM).	Agreed – this will also be considered in all new contracts and funding agreements.
TROUBLED FAMILY PROGRAMMES		
70	Welcome the increase in funding available for the troubled families programmes from £125,000 to £175,000. This increase in funding recognises the benefits that the Service will provide to Police activity in the future and the partnership delivery of the Service.	None required.
71	The CSP welcomes the additional funding that has been made available for the troubled families programme specifically as Leicestershire move into phase two of the programme earlier than expected.	None required.
72	Increasing funding available for the Troubled Families Programme is viewed as a positive step forward especially as we are now beginning to see some positive outcomes and also some reduction in demand for frontline officers.	None required.
73	Increasing the money allocated to the troubled families' agenda makes good sense in light of the strong performance being delivered by these teams.	None required.
HEALTH		
74	The Public Health department welcomes the plan and recognises the continued commitment of the PCC to partnership working. In particular, we welcome the continued commitment to specific activities that contribute to Public Health priorities, namely substance misuse, mental health and child sexual exploitation.	None required.
75	We welcome the continued commitment to specific activities that contribute to Health priorities, namely substance misuse and mental health.	None required.
76	From 2015/16 police custodial health will transfer to NHSE. We already have commissioning responsibility for liaison and diversion services. We would welcome discussions about aligning these commissioning arrangements with other services commissioned by the OPCC in the custodial environment.	Agreed – the OPCC will continue to develop its relationship with NHSE and is happy to consider all opportunities to align commissioning processes.

77	The proposal to improve outcomes for those with mental health needs is welcome (C1021) is welcome and should include young people who are known to YOS and are in the criminal justice system. The proposed partnerships development manager post and group delivery plan should include contributions from relevant statutory services including YOS and CAMHS.	Agreed – the Mental Health Partnership Group’s Delivery Plan is currently being finalised. The Mental Health Partnership Development Manager will engage with all relevant partners to ensure the Plan is delivered.
78	Need to establish sustainable funding for the Mental Health Triage Car - request that the PCC’s considers funding for Policing element of Triage Car.	Resourcing for the mental health street triage car is being mainstreamed through the Force Change Programme (Project Edison) and this is supported by the OPCC.
79	The street triage car is currently funded through the police operational budget, and we would welcome the continued support from the OPCC for this funding to continue.	As above.
CHILD SEXUAL EXPLOITATION AND MISSING FROM HOME		
80	The identification and prioritisation of work with children that are missing, at risk of sexual exploitation (CSE) and children who are placed in care as part of the strategic priority (C1020) to protect vulnerable people is welcome. The proposed pilot should involve relevant services provided by the city council education and children’s department together with any commissioned providers.	Members of the Safeguarding Board have initially been made aware of the proposed pilot and this will be progressed further as the pilot develops. The OPCC will seek to work closely with all appropriate partner agencies.
81	Is more generic work required to prevent abuse and child sexual exploitation, in addition to developing intelligence in relation to children and young people in care homes?	The proposed pilot will take place during 2014/15 and the results will be used to determine future commissioning requirements. The Commissioning Framework has been updated to clarify this.
82	We welcome the contributions towards the partnership deliver of strategic priority 15: To prevent child abuse and child sexual exploitation (CSE) and provide a safe and supportive environment for victims and witnesses. However it is imperative that this work sits inside the Safeguarding Boards sub regional Child Sexual Exploitation Sub Group and supports the delivery of the work through the single multi-agency CSE team that is currently being established.	Members of the Safeguarding Board have initially been made aware of the proposed pilot and this will be progressed further as the pilot develops. The OPCC will seek to work closely with the sub regional Child Sexual Exploitation Sub Group.

SAFEGUARDING		
83	The proposed partnership work to safeguard and promote the welfare of children and adults is welcome and should ensure that it is linked to wider service planning priorities through the local safeguarding boards for both children and adults.	None required.
84	For CI023, it would be useful to know what work with partners will actually be done and how the budget allocations relate to this work.	CI023 relates to funding which is provided directly to the Children and Adults Safeguarding Boards. The PCC's contribution is towards pooled budgets to deliver the Boards' Business Plans, rather than any specific activity or service.
DOMESTIC HOMICIDE REVIEWS		
85	The early indication of funding ring-fenced for Domestic Homicide Reviews (DHR) is welcomed, as it provides partners with a degree of reassurance.	None required.
86	Some reservations about the preparedness of partner agencies in effecting a response to 'domestic homicide reviews'. A greater collaboration between partner agencies would be welcomed.	This suggestion will be forwarded to Leicester City and Leicestershire County Councils who are responsible for co-ordinating the DHRs.
VICTIMS AND WITNESSES		
87	In terms of the commissioning intentions around Victim & Witness work, the Council's views have been shared separately with the OPCC.	None required.
88	The strategic priority five (SP5) to increase reporting of domestic abuse and ensure a positive outcome for victims and witnesses of domestic abuse is welcome. Any funding allocated through the PCC Grant process to support this priority should work closely with the Local Safeguarding Boards for Children and Adults and be integrated into the local domestic violence strategy to ensure maximum impact and reach to vulnerable children and families.	Agreed.
89	Fully support your principles of promoting good practice and targeting service provision based upon the needs of victims.	None required.
90	Strongly recommend that the PCC take this opportunity to set in place a Restorative Justice delivery infrastructure for Leicestershire that will be scalable and sustainable.	The comments made do not relate specifically to the Commissioning Framework. The suggestion that the use of restorative justice processes by Criminal Justice agencies should be included in any revision of the Police and Crime Plan will be considered in the next consultation on the contents of the Police and Crime Plan. A consistent approach to Restorative justice

		will be delivered through the Victim and Witness Contact Bureau.
91	Child on parent violence is a sub-set of domestic abuse and therefore should be considered for funding.	The PCC Grant will be available to voluntary and community sector organisations specifically to increase the reporting of domestic abuse. The OPCC will be also be commissioning support for victims of domestic violence. This will be for high risk/repeat victim safety and outreach support, and a Leicester, Leicestershire and Rutland telephone helpline.
92	The proposal, if correctly understood, that generic victim and witness support services will meet the 'cope and recover' needs of victims, is something which concerns us. We also believe that victims of rape and sexual assault require support from a specialist service.	It is not proposed that cope and recover provision will be generic for all victims. The OPCC will also be commissioning specific support for victims of sexual and domestic violence.
93	If all funding for initiatives which support victims of rape and sexual assault are allocated to SARCs, the needs of many victims/survivors of rape and sexual assault will go unmet.	It is not proposed that the only funding for victims of rape and sexual assault will be allocated to the Sexual Assault Referral Centres. CI012 relates specifically to SARC funding but additional funding will also be available for specific support for victims of sexual violence.
94	Can we get our partners in domestic abuse to bid for funding if they are not already doing so?	Yes – partners can bid for a PCC Grant to increase the reporting of domestic abuse. The OPCC will also be commissioning specific support for victims of domestic violence.
INTEGRATION, EQUALITY & DIVERSITY		
95	Request for funding for Prevent initiatives.	The Police and Crime Plan outlines the PCC's expectations of the Police in relation to counter terrorism. Resources are already provided by the Police for PREVENT work in Leicester, Leicestershire and Rutland. Prevent is therefore not covered as a separate intention within the Commissioning Framework. However, the PCC Grant provides an opportunity for organisations to bid for funding to increase the reporting of hate crime.
96	Equality, diversity and human rights (EDHR) is a theme which must run throughout the Police and Crime Plan, we believe that there are particular actions required which would ensure that EDHR is firmly delivered and that confidence is built with the affected communities. The lack of specific actions can leave a sense of soft commitment.	EDHR is not identified as a separate strategic priority in the Police and Crime Plan and therefore is not addressed through the Commissioning Framework. However, all providers are required to provide evidence that equality and diversity issues have been considered as part of their delivery model.
97	The 'integration' agenda formerly referred to as 'community cohesion' is one which the Police must respond to. Integration needs to be a more direct part of the PCC's commissioning intentions.	Integration is not identified as a separate strategic priority in the Police and Crime Plan and therefore is not addressed through the Commissioning Framework. This will be considered in the next refresh of the Police and Crime Plan.

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