

## MINUTES

### OFFICE OF THE POLICE, FIRE AND CRIME COMMISSIONER FOR ESSEX

#### ESSEX POLICE PERFORMANCE AND RESOURCES BOARD

23 July 2020, 10.00am to 1.00pm, Video Conference and Telephone Conference

#### Present:

Jane Gardner (JG)	Deputy Police, Fire and Crime Commissioner (Chair)
Dr Vicki Harrington (VH)	Director of Strategic Change and Performance, Essex Police
ACC Rachel Nolan (RN)	Assistant Chief Constable, Essex Police
Debbie Martin (DM)	Chief Finance Officer, Essex Police
Richard Jones (RJ)	Corporate Finance, Essex Police
Richard Leicester (RL)	Director of HR, Essex and Kent Police
John Gorton (JGo)	Head of Transport Services, Essex Police
Liz Helm (LH)	PFCC Interim Head of Finance
Janet Perry (JP)	Strategic Head of Performance and Resources, PFCC's office
Anna Hook (AH)	Head of Performance and Scrutiny, PFCC's office
Claire Putnam (CP)	Minutes, PFCC's office

#### Apologies:

Roger Hirst (RH)	Police, Fire and Crime Commissioner
DCC Pippa Mills (PM)	Deputy Chief Constable, Essex Police
Pippa Brent-Isherwood (PBI)	Chief Executive, PFCC's Office
Mark Gilmartin (MG)	Director of Support Services, Essex and Kent Police'

#### 1 Introduction and welcome

JG welcomed all to the meeting and apologies were received from RH, PBI, PM and MG.

#### 2.i Minutes of last meeting

Point 4.9 VH requested the wording to change to 'VH confirmed that the Force has invested a lot in improving data quality, and the recent Datactics pilot has given a standalone data set and the Home Office plan is for this pilot to be rolled out nationally'. Point 5.13 VH requested the wording to change to 'PM confirmed that she has taken over as Gold Command for Op Talla'. Subject to the amendments above, the minutes of the last meeting held on 25 June 2020 were approved. There were no matters arising not included on the agenda.

#### 2ii Action Log

18/20 Finance Report (Pay Only) - DM and LH to discuss the council tax non-payment implications from an Essex point of view. Update 23 July 2020: AH confirmed this conversation has taken place, therefore the action is closed.

19/20 Monthly Report (May) - VH will separately identify drink driving and drug driving in the next report. Update 23 July 2020: AH confirmed this is done and the action is closed.

20/20 Collaboration - VH and JG to discuss the Societal Impact of Covid-19 Project. Update 23 July 2020: Discussion has taken place, action is closed.

21/20 PFCC Victim Commissioning Programme - KS and VH to discuss Victim Support data trends. Update 23 July 2020: Meeting is scheduled, action will remain open until meeting has taken place.

### 2.iii Forward Plan

- 2.iii.1 AH confirmed she is working with VH and Clare Heath's team to update the Forward Plan to December 2021. VH stated the standing Monthly Finance Report for the September's meeting will be late as it has to go to COG first and the timings will not work. JG noted this. JG also asked that JP be involved in looking at the Forward Plan.

## 3 Finance

### 3.i Efficiency and Investments Plan (Transformation Savings)

- 3.i.1 VH stated there have not been many changes since the last report. The Police and Crime Panel agreed target was £6.8 million, which the Force exceeded by £1.3 million for both cashable and non-cashable savings, with total savings being £8.1 million. The forecast has not changed since last month and is still at £8.2 million. Two businesses cases (Criminal Justice and Local Policing Support Unit) have been reinstated but the decision to pause them has meant the savings will be less. There is a £97k shortfall from 2019/20. The plan was to look for early savings from the 2021/22 Savings Plan and £213k (£162k recurring) has been identified. This results in a surplus against plan of £32k (£25k recurring). The in-year savings have been achieved in the custody review on detention officers, there is ongoing work to determine the full year savings. The impact of pausing the Criminal Justice business case is £24k and pausing the LPSU is £56k less.
- 3.i.2 The total savings required for 2021/22, are £7.2 million in cashable and non-cashable savings. So far £2.4million (£2.9million recurring) has been identified. Work is ongoing to identify the remaining savings. VH confirmed the plans have been presented at the Efficiencies and Savings Board, and although most are subject to review, they have been agreed in principle. The Force will also be considering vacant hours and some posts.
- 3.i.6 JP stated for her to understand the detail of the reports she would like to meet with VH, DM and LH. VH confirmed she would prefer to meet after the Efficiency and Savings Board on 17<sup>th</sup> August.

#### **Action: 22/20**

**JP was keen to know more about the 21/22 savings Profile so a date would be arranged when the detail was available and after it had been through the Governance process. PM confirmed that the budget setting process starts in October/ November so Action is ongoing.**

### 3.ii Quarterly Finance Report

- 3.ii.1 DM stated at the end of month 3 there is a forecast overspend of £4.37 million, which includes £2.5 million for Op Talla and approximately £1 million for Op Melrose. The Force has received confirmation that they are likely to receive the PPE cost relating to OP Tala, which will be reflected in month 4.
- 3.ii.2 There are 3,298 FTE Police Officers at the end of June and forecasting 3,369 FTE for the year end.

- 3.ii.3 The capital forecast is a deficit of £9.7 million by year end.
- 3.ii.4 DM explained that the overspend on Police Officer Overtime is £1.3 million. She also explained that the Police Staff vacancy factor is 9% for most departments and is still forecasting a £1.3 million underspend. Transport is £500k underspend mainly due to Covid-19 and the reducing cost of fuel. Supplier and Services are £901k overspent, which includes PPE. Income is forecasting a £665k shortfall which includes mutual aid contributions which Essex Police would normally receive from other Forces, but no assistance has been requested so far this year.
- 3.ii.5 DM explained the £4.3 million forecast overspend, would come from the Major Incidents Reserve (either Op Talla or Op Melrose) with the balance coming from the General Reserve. Op Melrose figures will fluctuate over the next few months as the Trial is not until November. DM said the Op Talla monthly returns are scheduled and that they are also working with MHCLG regarding loss of income, particularly due to Stansted.
- 3.ii.7 JP asked about the true likelihood of reporting a deficit of £4.3 million by the year end. She also questioned changing the forecast each month. It was agreed the Op Tala and Op Melrose tables would be removed from the report to avoid any confusion. AP suggested that JP, AP and DM meet to discuss future reporting of forecasts.

**Action: 23/20**

**JP, DM and AP to meet regarding future forecasting**

- 3.ii.9 DM stated the leavers for the year are less than forecast, this will be monitored regularly to ensure the figure of 3,369 FTEs is achieved by year end. Police Staff establishment is 2,240 FTEs with a vacancy factor of 135 WTEs the actual WTEs are 2,071 a further 34 WTEs below the vacancy factor WTE.
- 3.ii.10 DM confirmed the Force will be looking at the expected Proceeds of Crime Act reserves and how this will be used over the next 5 years. The Major Incident reserves will reduce by £1.5 million if no funding received for Op Talla or Op Melrose. The general reserve allocation is £4.337 million, reduced to £2.837 million due to allocation from the Major incident reserve. This would leave reserves at £6.8 million by the year end at year end.
- 3.ii.11 JP asked if the £1 million moving from revenue to capital, could be reconsidered. DM confirmed this had been agreed at the budget setting by the Police Fire and Crime Panel. JG said it would be difficult but suggested a discussion to consider this.

**Action: 24/20**

**JP, JG, DM and LH to discuss the transfer from revenue to capital in 2020/21**

**Action: 25/20**

**RJ to remove the tables and send to the PFCC's office for publishing purposes.**

**RJ left the meeting at 10.44am**

- 4. Monthly Performance Report (June)
  - 4.i. Monthly Performance
    - 4.i.1 VH confirmed this is the second month of having new priority indicators with two additions. Domestic Violence Prevention Order's and Domestic Violence Prevention Notice's are now included as well as modern slavery referrals to the NRN. There has

been no change to the overall grades, four of the seven priorities are good and three require improvement. All crime fell by 1.8% for the 12 months to June 2020 compared to the 12 months to June 2019. This equates to 2,983 fewer offences. Essex Police recorded 211 fewer offences in the month of June 2020 compared to June 2019; this equates to a 1.6% reduction. VH confirmed that at the beginning of the lockdown, the Force were recording a 25% reduction in offences. Prior to any restrictions the daily average was 456 offences, when restrictions first started the number went down to 430, with compulsory lockdown it went down to 351 (a reduction of 100 offences a day). Once restrictions started to ease it has gone up to 411, then to 422 when schools reopened. At the end of June offences were up to 457, although still a year on year reduction of 1.8%.

- 4.i.2 The pattern of Anti-Social Behaviour has changed, for June the Force saw a 31.2% increase, and in May it was nearly 48%, however this was mainly due to the Government's social distancing restrictions implemented on 23 March 2020. VH stated Racial and Religiously Aggravated Offences is a new statistical outlier for this month. JG asked if this was directly due to Covid-19, AP stated that there's been a lot of attention around racial disparity, which might have led to more people coming forward to report hate crime. VH confirmed that Hate Crime has also reported an increase of 11% for June 2020 compared to June 2019.
- 4.i.3 VH stated that Public Order is also a new statistical outline for the month and has increased on average by 24% for June 2020 compared to June 2019 and year on year a 10.4% increase. AP stated that there have been several pro-active preventative policing operations around protests, raves and unlicensed music events and street parties. VH discussed the priorities and Most Similar Group (MSG) ratings and highlighted that Domestic Abuse requires improvements with an increase in incidents and repeat incidents, however there has been an increase in arrests and DVPO's and DVPN's have increased by nearly a quarter. There's also been a 2.9% increase in solved domestic abuse outcomes.
- 4.i.4 VH stated in June 2020 the City of London Police published their annual data on cyber fraud, which highlighted that the Essex Police Cyber Crime Unit (CCU) was the most successful of all police forces. 56% of all charges for cybercrime offences in the UK were gained by Essex Police's CCU, and two of its officers were recognised for their work at the National Police Chiefs' Council Cyber Awards. At the same time, the Unit have been working on several prevention initiatives, to support people to protect themselves against online fraud and crime.
- 4.i.15 In summary, VH confirmed 13 priorities are improving, 3 are stable and 8 are deteriorating but the balance is on the improving side. JG agreed it's a much richer picture and better balance. JP asked what was in place to turnaround the 'requires improvement' priorities. VH confirmed there is a Force Performance Board, chaired by Detective Chief Constable Pippa Mills where the balance scorecard is reviewed, and actions put in place to ensure focused activity. AP stated that Assistant Chief Constable's and Assistant Chief Officer's will own the areas of improvement.

#### 4.ii Quarterly Performance Report

- 4.ii.1 VH highlighted the contributions Specials have made, with a 36% increase in hours. One of Tendring's dedicated Special Constables provided 276 hours of duty time during this period (up from 65 hours during the same period last year). This has focused on high visibility Covid-19 reassurance patrols in Clacton Town Centre. AH stated that this paper goes to the Police Fire and Crime Panel, where District and Parish Councillors are represented, it would be useful to remind them that they can distribute further as it covers feedback discussed at the Synergy meeting, JG noted this.

#### 4.iii MSG (Most Similar Group) Aspirations

- 4.iii.1 VH confirmed the Force is meeting aspirations in four of ten areas, last quarter it was, three of ten. The All Crimes Solved rate is the new aspiration met. VH confirmed that six of ten are not being met. There are also two areas with no aspirations set, these are Killed and Seriously Injured and Homicide. VH confirmed the Force's MSG ranking has improved in two areas, All Crimes Solved Rate and Trafficking of Drugs. However, MSG ranking for Violence with Injury has fallen. JG stated if all forces achieved Crime Data Accuracy at the level of Essex Police the figures would change. VH agreed and AP stated that Essex Police is 96% accurate for data recording of crimes. Some forces are in the mid 80% for accuracy.

#### 5 Human Resources and Staff Performance Reports (Quarterly)

- 5.1 RL took the Board through the report and highlighted the following; Police Officer strength has increased by 12.7% since March 2020 with 3,306 FTE, which is on target. Police Staff are at 2,061 FTE, (178 FTE under establishment). The FTE is the same as in March, however the vacancy rate has increased slightly, due to an increase in the establishment. The functions with the highest vacancy rate are Crime and Public Protection Command (12.5%) and Serious Crime (10.8%). When combined Support Services and Human Resources and Learning and Development have a vacancy rate of 26.7%. 15 officers are due to move into Crime and Public Protection in July 2020 with a further five joining in August, with a further four successfully gaining roles but release dates are yet to be agreed. For Police Staff there is a longer delay in recruitment due to the external challenges around Covid-19, however, this is moving forward. RL stated there are 516 Specials in post a reduction of five, but Essex Police remains the second largest Special Constabulary in the country after the Met Police. For the period April to June 2020, there was one intake of new recruits scheduled. This was originally projected to be 52 FTE, however, due to the current Covid-19 pandemic the intake was marginally lower than projected with 46 FTE joining. A further 3.5 FTE officers have re-joined during this period, as well as 6 FTE officers who have transferred in. As a result, total recruitment for the year to date is 55.5 FTE. RL noted his praise to the team for changing working and recruitment processes quickly due to Covid-19.
- 5.2 JG asked RL to extend the thanks of the PFCC to all involved. JG also stated that she is still attending passing out parades and special attestations, she said the quality and number of recruits is fantastic. RL confirmed the Force are still receiving a strong flow of applications and following the cancellation of the national SEARCH Assessment Centre, Essex Police are an early adopter of the new national virtual online officer assessment process, which is proving to be hugely successful and more efficient. The representation of Black, Asian and Minority Ethnic (BAME) officers has increased with a headcount of 109 (3.22%) at the end of June, an increase of two since the end of March (3.17%).
- 5.3 JG thanked RL on a very comprehensive paper. JP asked if Specials are able to become Officers. RL explained Specials are sometimes seen as the gateway into the Police Force. RL said they are working on a process whereby there would be no assessment to move from a Special to a Regular. JP also asked why overtime figures were not included in the report, as she felt this was a very important issue from an HR perspective. RL said overtime is in the finance report. RL stated it is down to each command lead to look at their area of the business and the budget holders manage overtime from the finance reports. JP said she considers there is a gap with the HR report not including overtime, even to include it in a narrative form just regarding well-being would be helpful. AH said a lot of work went into developing the dashboard, but a discussion is probably needed to consider this.

**Action: 26/20**

**JP, RL and DM to discuss overtime reporting in the HR paper.**

- 5.4 AH asked if there were any plans in place already for the flu vaccination. RL confirmed they have managed to secure 500 vaccinations already and received confirmation today they have secured a further 2,000. The cost is around £13.5k

**RL left the meeting at 11.57am**

There was a slight re-ordering of the Agenda to allow JGo to present his item

**6 Transport Services**

- 6.1 JGo took the Board through the paper and explained that SEERPIC (South East and Eastern Region Police Insurance Consortium of ten members) were required to find a new insurance company as a previous company had declined to provide cover. The new insurer, Edison, were very clear in wanting to implement significant improvements around managing the driving risk. JGo stated his team have been looking at reducing risk and numbers of incidents which will reduce costs. At present the insurance does not pay out unless a single incident reaches £375k, increasing to £400k in October. Which means unless there is a major accident, the Force's budget will pay for accident damage. PA Consulting were commissioned to review this issue and they identified opportunities around governance, supervisory accountability for drivers and a somewhat siloed approach to managing road risk between sections and departments. A report to Joint Chief Officer Group in January 2019 provided comparative data between Essex and Kent, highlighting incidents and respective costs.

- 6.2 An action plan (developed with the support of PA Consulting), was reviewed and supported by both forces. This prompted several thematic reviews around the operational deployment of vehicles. JGo stated that road risk within any Police Force is different to any other company as the Officers put themselves and the vehicles in harm's way on a regular basis in order to protect the public and to enforce law. This requires different training, standards and approach. Transport Services are responsible for procuring the right vehicles, making sure they are fit for purpose and ensuring they are maintained and serviced. Learning and Development is making sure the drivers are trained to drive the vehicles as well as being knowledgeable of legislation and policy. The focus operationally is on understanding the right vehicles to use, the right Officers to drive and how are they deployed to incidents in the safest way possible. The Force's current position is they have a clear and resilient structure linking the key stakeholders, with processes to review and manage Police Vehicle Incident's (PVI's). This is monitored through existing strategic reporting through to chief officers, who clearly understand the issues and is overseen by the Road Risk Board and Chief Officer's Group. JGo stated that the PVI's have increased over the years and the Force are much better at recording them, in part due to decriminalising incidents with a vehicle. JGo stated Officers have been encouraged to report incidents, no matter how small, so the vehicles are safe and road worthy for all drivers. Pursuits are now monitored through the Force Control Room.

- 6.3 JGo said the number of vehicles in the fleet has stayed static because they are being utilised in a more proactive way. The Force has seen an increase in mileage. JGo stated accidents and damage to vehicles has been static but costs of repair have increased. JGo confirmed the number of Officers unharmed after very serious incidents has improved over the past six years. Whilst the Force now has the infrastructure to manage corporate road risk within Essex Police, they are in the final stages of developing reporting dashboards and driver scores from Telematics, which

will support managers and local supervisors to identify those individuals requiring further training or management intervention.

- 6.4 JGo confirmed Essex have been the only Force to be approached about obtaining a Business Champion Status, but there is still a lot of work to be done. AH asked if improvements across all SEERPIC are needed to impact on the premium and is this achievable. JGo confirmed because the Force is insured for a catastrophic event, there would have to be a significant shift across the entire consortium to achieve this. Work has been done to enable the insurance company to keep insuring Essex Police. AP confirmed the excess before making a claim means only claims for catastrophic events are made. He has asked the insurer for the number of claims in the last 10 years which could raise the question of, is the right long-term arrangement in place. AP believes it is unlikely in a consortium of ten no matter how well Essex Police performs that we will achieve any significant reduction in premiums. DM confirmed that costs are just under the £2 million and the contract is up for renewal in October 2021, with an option to extend. The costs will be apportioned across the ten forces in SEERPIC. Essex Police have been penalised for a catastrophic event in 2011, the consortium is now considering a new methodology. JP asked if the ten Forces should consider a self-insure option, JGo stated this is an option, but could be high risk, DM agreed.

#### **JGo left the meeting at 12.28pm**

### **7 Public Perception Survey (Q4 Results)**

- 7.1 In Q4, of 2019/20, 69% of respondents said the police in their local area do an excellent or good job. This was a significant increase from Q3. Victims, however, are less likely to agree that the police are doing a good or excellent job. Those who said the Police did an excellent job remains stable between Q3 and Q4 at 18%. Confidence in receiving a good service increased significantly to 71% in Q4 (Q3, 67%). Victims are least likely to believe they would receive a good service at only 52%. Perceptions of fairness are a key factor in how confident people feel about the police. Performance remains stable, Q3 and Q4 have 7 in 10 residents feeling they would be treated fairly if they made a complaint. Victims, younger people and BAME respondents are all less likely to feel that they would be treated fairly by the police if they made a complaint. 66% agree the police understand community issues, 64% in Q3. This is the highest level of agreement seen since the survey began (quarterly and annually) and is being driven by a higher percentage of people who strongly agree. Victims and BAME respondents remain less likely to agree that the police understand community issues.
- 7.2 52% feel the police are dealing with crime and ASB in their area, compared to only 47% in Q3. There has been an increase in those who 'strongly agree' comparing the rolling 12 months, 14% this year and 9% last year. 50% of respondents were satisfied with the level of local policing, 47% in Q3. This is the highest level of satisfaction recorded since the survey began and a significant increase against previous performance. Victims and BAME remain the least likely by some margin to feel satisfied with the level of local policing. 7 out of 10 residents feel that the police use their powers of Stop and Search fairly, an increase from 68% in Q3. Despite this quarterly improvement, annual figures show a significant fall in those who agree that Essex Police use their Stop and Search Powers fairly. After a significant increase in the previous quarter, the proportion of people who feel informed about what the police are doing has remained broadly stable at 46% in Q4. Notably, the importance of a regular uniformed presence dropped significantly from 76% in Q3 to 64% in Q4. Results also show a significant increase against previous performance for those who would speak highly of their local police, although still slightly below the national



average. JG stated there are some very exciting stories here and thanked VH for the report.

## 8 Covid-19 Interim Confidence Findings

- 8.1 VH confirmed that overall ,73.9% of those surveyed have confidence in the approach the Force is taking in policing during the pandemic. This is a decrease of 2 percentage points compared with week five. The level of confidence was highest in week two at just over 80%. VH said 77% of the public fully support the approach Essex Police is taking in policing the current situation. An increase of 1.8 percentage points compared to week five. Week seven had the highest support at 82.2%. Of those who do not support the approach, 11% think Essex Police should be taking a tougher stance, while 1.7% think Essex Police are going too far. There is a strong correlation between those most satisfied with the communication policy and those who have also seen local information. This indicates the positive impact the communication has had. VH confirmed most people who have been stopped and questioned, 18 out of 22 were satisfied. JG is pleased with the public endorsement and AH stated it would be interesting to look at Covid-19 related complaints, as they have increased against a background of this positive feedback. VH will include this in the next report.

### **Action: 27/20**

### **VH to include Covid-19 related complaints data in the report**

## 9 Hate Crime

- 9.1 RN explained it has been a while since this topic has been brought and therefore the report includes two years of data. June was the highest month of hate crime reporting for two years, however non crime incidents continue to reduce in part due to Crime Data Accuracy and an increase in confidence in Essex Police. There are five groups where hate crimes are recorded, these being; Race, Religion, Disability, Sexual Orientation and Transgender. There are sub-groups of Goths, Migrants and Sex Workers, the numbers recorded here are relatively small. Hate Crime is part of the Force Tasking Process to prompt the partnership problem solving response where required and District Commanders are fully aware and engaged in the process. RN confirmed that eight crimes per day were being reported and since restrictions have lifted that has increased to ten crimes per day and over the last year there has been an 11.2% increase which is approximately 300 crimes. Race continues to be the largest percentage of recorded hate crimes which also reflects the national picture. RN stated there has been a marked increase in hate crime involving sexual orientation and disability which is being monitored. Covid-19 and Black Lives Matter (BLM) have had a statistical impact on reports of hate crimes, there were eight BLM reported incidents and 28 relating to Covid-19. RN confirmed there had been a slight reduction in solved hate crimes from 13% down to 11%. 45% of victims are not supportive of Police action as they just want to report it, stand up to hate crime and make the Police aware. Scott Cannon compiled a Hate Crime Victim Satisfaction Survey in November and 24 randomly selected victims undertook the survey, the findings showed 21 (88%) victims understood what was going to happen in the next stage of the investigation and 23 (96%) victims felt Officers took the matter seriously and listened to what the victim had to say. RN said a 4P plan is in place relating to the prevention of Hate Crime. There is engagement with schools, independent advisory groups and faith group leaders, but there's still more to do. JG stated the report should be presented annually, RN agreed as the impact on victims is very important to track and work on. AH asked if the Force have any idea of the level of under reporting of Hate Crime, RN replied it is under reported nationally but hard to know by how much as it is a complex area. JG stated there is a role for the PFCC in messages of reassurance and encouragement. JP said she thought that in the first



instance seeing an increase in Hate Crime could be a good thing as the public are more prepared to report these crimes. RN agreed it is positive, but the message is difficult to communicate.

**Action: 28/20**

**AH to put Hate Crime in the Forward Plan annually.**

**RN left the meeting at 1.11pm**

10 Covid-19 Fixed Penalty Notices

10.1 VH stated 216 Covid-19 Fixed Penalty Notice (FPNs) investigations were created in the six weeks to 14 May 2020. This is a comparatively low amount and mirrors the national picture. Essex offences were generally committed close to home, and over half were known as a suspect on another Athena investigation. Some ethnicity data is missing or not recorded, however, for those FPNs that were issued where ethnicity was known or stated, 24 (12.9%) suspects had a Black, Asian or Minority Ethnic (BAME) appearance., almost double the proportion of Essex BAME residents recorded in the 2011 census (6.8%) but includes FPNs issued to non-Essex residents.<sup>1</sup> JG stated that the Force should be congratulated on Policing by consent and that the report was interesting to read. AH stated that the number of people who received FPN's and were already known to Essex Police was interesting and also the report shows that it's not just an Essex problem. AP confirmed the Force are looking into understanding Stop and Search and Disproportionality.

11. AOB

11.1 As this is AH's last Performance and Resources meeting before joining Essex Police, JG took the opportunity to thank AH for all her hard work, support and input into the meetings and stated she will be an asset to Essex Police.

There being no other business, the meeting closed at 1.30pm

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<sup>1</sup> Ethnicity is recorded within investigations in two fields: "Ethnic Appearance" and "Ethnicity Self Code". "Ethnic Appearance is officer defined ethnicity and completed by the investigating officer. "Ethnicity Self Code" is defined by the suspect and not mandatory. "Ethnicity Self Code" data were not present (either due to the field not being completed or "Unknown" being entered) in relation to the records for 52 (23%) individuals; by contrast, "Ethnic Appearance" data were not present for 40 (17.7%) individuals. Furthermore, when using the "Ethnicity Self Code" field, those of Black, Asian or Minority Ethnic (BAME) appearance account for 12.4% of those who were issued with FPNs, compared to 12.9% when the "Ethnic Appearance" field is used.

