

SOUTH YORKSHIRE POLICE AND CRIME PANEL

The Police & Crime Panel is responsible for scrutinising and holding to account the South Yorkshire Police & Crime Commissioner for the way in which the Commissioner delivers their responsibilities for setting the priorities and resources for South Yorkshire Police as well as for supporting broader community safety activities in the county.

The Police & Crime Panel is a joint body established collectively by each of the local authorities in the county, with Rotherham Metropolitan Borough Council acting as the host authority.

The membership of the Police & Crime Panel consists of 10 councillors drawn from each of the local authorities in the South Yorkshire Police Area according to a set allocation of places, and 2 independent co-opted members drawn from the local community.

The current membership is as follows:

Panel Members	Role	Local Authority
		Represented
Councillor Talib Hussain	Chair	Sheffield
Councillor Stuart Sansome	Vice-Chair	Rotherham
Councillor Brian Cutts	Member	Rotherham
Councillor Jackie Drayton	Member	Sheffield
Councillor Robert Frost	Member	Barnsley
Councillor David Griffin	Member	Barnsley
Councillor Chris McGuiness	Member	Doncaster
Councillor Joe Otten	Member	Sheffield
Councillor Mick Rooney	Member	Sheffield
Mr Alan Carter	Independent Co-opted Member	
Mr Steve Chufungleung	Independent Co-opted Member	

^{*}There is currently one vacany on the Panel for a representative from Doncaster MBC.

The agenda papers for Police & Crime Panel meetings are published 5 working days in advance and can be downloaded from the Rotherham Council website –

Public Questions to the Police and Crime Panel

If any member of the public wishes to ask a question at the Panel meeting they should be submitted in writing at least 24 hours before the date of the meeting and be no more than 50 words. They should be submitted to James McLaughlin, Democratic Services Manager (james.mclaughlin@rotherham.gov.uk) 01709 822477

AGENDA

Date:- Friday, 28 October 2016

Time:- 11.00 a.m.

Venue:- Town Hall, Moorgate Street, Rotherham. S60 2TH Contact James McLaughlin, Democratic Services Manager

Tel. 01709 822477 or james.mclaughlin@rotherham.gov.uk

.

- 1. Apologies for Absence
- 2. Declarations of Interest
- 3. To consider whether the press and public should be excluded from the meeting during consideration of any part of the agenda.
- 4. To determine any item which the Chairman is of the opinion should be considered as a matter of urgency.
- 5. Questions from Members of the Public
 If any member of the public wishes to ask a question at the Panel meeting they should be submitted in writing at least 24 hours before the date of the meeting and be no more than 50 words.

They should be submitted to James McLaughlin, Democratic Services Manager (james.mclaughlin@rotherham.gov.uk) 01709 822477

- 6. Questions from Members of the Panel
- 7. Minutes of the Previous Meetings held on 9 June and 8 July 2016 (herewith) (Pages 1 13)
- 8. Police and Crime Commissioner 'State of the Nation'
- 9. Police and Crime Commissioner's Annual Report (Pages 15 31)
- 10. Progress with the Peer Review (Pages 33 34)
- 11. Update on the Operation of the Complaints Procedure (Pages 35 36)

12. Judicial Review Proceedings - Verbal Update

13. Work Programme 2016-17

14. Dates of Future Meetings
Friday 9 December 2016 at 11.00am
Friday 24 February 2016 at 11.00am
Friday 21 April 2016 at 11.00am

SHARON KEMP,

Chief Executive.



POLICE AND CRIME PANEL Thursday, 9th June, 2016

Present:-

Barnsley MBC

Councillor R. Frost

Doncaster MBC

Councillor A. Jones

Councillor C. McGuiness

Rotherham MBC

Councillor B. Cutts

Sheffield CC

Councillor J. Drayton

Councillor T. Hussain (in the Chair)

Councillor J. Otten

Councillor M. Rooney

Co-opted Members

Mr A. Carter Mr S. Chu

Apologies for absence were received from:

Councillor D. Griffin (Barnsley MBC)

Councillor S. Sansome (Rotherham MBC)

F1. APPOINTMENT OF CHAIR FOR THE MUNICIPAL YEAR 2016/17

Resolved:-

That Councillor Talib Hussain be appointed as Chair of the South Yorkshire Police and Crime Panel for the 2016/17 Municipal Year.

F2. APPOINTMENT OF VICE-CHAIR FOR THE MUNICIPAL YEAR 2016/17

Resolved:-

That Councillor Stuart Sansome be appointed Vice-Chair of the South Yorkshire Police and Crime Panel for the 2016/17 municipal year.

F3. TO CONSIDER WHETHER THE PRESS AND PUBLIC SHOULD BE EXCLUDED FROM THE MEETING DURING CONSIDERATION OF ANY PART OF THE AGENDA

The Chair confirmed that there were no items of business on the agenda which would require the exclusion of the press and public from the meeting.

F4. TO DETERMINE ANY ITEM WHICH THE CHAIRMAN IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY

The Chair reported that there were no urgent items of business requiring consideration by the Panel.

F5. DECLARATIONS OF INTEREST

There were no declarations of interest.

F6. MINUTES OF THE PREVIOUS MEETING HELD ON 4 MARCH 2016

Resolved:-

That the minutes of the meeting of the South Yorkshire Police and Crime Panel held on 4 March 2016 be agreed as a true and correct record of the proceedings.

F7. QUESTIONS FROM MEMBERS OF THE PUBLIC

It was reported that Procedure Rule 10 (General Questions by Members of the Public at Panel Meetings) enabled members of the public to submit questions to the South Yorkshire Police and Crime Panel. The Clerk to the Panel reported that Mr Peter Thirlwall had submitted the following question:-

"Is it true that the Crime Commissioner's Election Agent is the Partner/Husband of the previous Police and Crime Panel Chair and if so, was it detailed in his declaration of interests and it is appropriate?"

The Chair invited the Police and Crime Commissioner to comment on the question. The Commissioner indicated that the South Yorkshire Elected Local Policing Body Code of Conduct required him to notify disclosable interests in the following areas:

- Employment
- Sponsorship
- Contracts
- Land
- Licenses
- Corporate Tenancies
- Securities
- Other Interests: Membership of other organisations

He indicated that he had met that required and published his disclosable interests on the Office of the Police and Crime Commissioner website. He further explained that, as the selected Labour candidate, not in his capacity as Police and Crime Commissioner, he had formally appointed Howard Knight (husband of the former Chair of the Police and Crime

Panel) as his election agent on 4 April 2016, although he asked him informally on 15 March 2016.

The Commissioner indicated that in the interests of openness and transparency, had a meeting of the Police and Crime Panel taken place after that date, he would have drawn attention to this relationship with the Police and Crime Panel's Monitoring Officer before the meeting, notwithstanding that he was not required to declare it.

In response to Mr Thirlwall's question, the Chair indicated that the former Chair of the Police and Crime Panel was no longer a Panel Member or an Elected Councillor in Sheffield and he could not comment further.

F8. QUESTIONS FROM MEMBERS OF THE PANEL

In accordance with Procedure Rule 11 (General Questions from Members of the Panel), the following questions were put with responses from the Police and Crime Commissioner:

Mr. Alan Carter, a Co-opted Independent Member of the Panel, had submitted the following question:

"My question arises from some information that I have which relates to the Government having opened bidding to a £15m fund with the intention of providing health based places of safety to stop the practice of those in mental health crisis being held in police cells. I am anxious to know if the Commissioner is concerned about current practice and is aware of this initiative. I would ask if, in the interests of the people of South Yorkshire generally, he will be actively encouraging the South Yorkshire Police to support a bid for a proportion of this funding for allocation to South Yorkshire, thereby significantly reducing the need in South Yorkshire for the use of police cells and vehicles for this purpose."

The Police and Crime Commissioner responded:

"I am aware of the £15 million fund available to provide health and community based places of safety, in order to prevent vulnerable people being held in police cells. However this funding has not come directly to Police and Crime Commissioners.

South Yorkshire Police and I fully support this initiative. A number of bids are currently being developed and discussed at the Countywide Strategic Mental Health Partnership Board and such bids have already received my full support."

Mr Alan Carter submitted a further question for the Police and Crime Commissioner:

"Does the Commissioner see any relevance in this arrangement in the NHS to addressing the not entirely dissimilar situations (of unacceptable

levels of care and a culture which deters staff from raising genuine concerns) which can and do arise in the Police Service? And could he envisage the similar appointment of a National Guardian, to promote and reinforce best practice in supporting police staff (uniformed and civilian) to speak up safely through a network of Freedom to Speak Up Guardians (which, at a local Force level, conceivably might be Police and Crime Commissioners and/or their Deputies)?"

The Police and Crime Commissioner provided the following response:

"I do see the relevance of work undertaken by the NHS in relation to staff being deterred from raising genuine concerns about poor care and dangerous practices.

In January this year, the draft National Policy and Guidance about Reporting Concerns (Whistleblowing) released by the College of Policing was presented to my Independent Ethics Panel for comment prior to being rolled out in the Force. The Independent Ethics Panel has a role and there is a protocol which sets out the process Panel members should follow if they are approached by a member of South Yorkshire Police wishing to challenge or report improper behaviour.

Officers and members of police staff also report concerns directly and confidentially to my office and these are treated sensitively and seriously, usually by my Chief Executive and/or the Chair of my Independent Ethics Panel. Concerns reported to my office anonymously are also considered and any issues which need to be raised with the Chief Constable and Senior Leadership Group, and action taken, are so raised."

Councillor Robert Frost submitted the following question:

"Could Dr Billings outline his plan for South Yorkshire Police moving forward to regain the trust of the public. Will Dr Billings lobby the Home Secretary forcefully to have any costs of an enquiry into Orgreave funded centrally? Many people in the area were not born at the time and should not suffer police cuts as a result. Other forces were also involved in policing the dispute and I believe the Tory Government at the time was complicit in decisions taken."

In response, the Police and Crime Commissioner stated:

"Dealing first with the question about the policing of events at the Orgreave coking plant in 1984, I am currently talking to the Interim Chief Constable, the Truth and Justice Campaign and the Home Office about a way forward, particularly over the matter of making the archives held by the Force publicly available. I have, of course, said publicly many times that I support an independent review or public inquiry into Orgreave.

It is well known that policing at Orgreave was provided by a number of forces in the country and, if this is to be the subject of an enquiry this should be seen as a national issue and funded by central government. One of the lessons from Hillsborough is that the only way to establish all the facts and for justice to be done is for the Force to be fully open and to do everything possible to ensure that any enquiry is both thorough and swift.

The Interim Chief Constable and I have already requested a meeting with the Home Secretary to discuss a range of issues facing South Yorkshire Police. I am hopeful of constructive discussions; the Home Secretary has already been receptive to previous approaches I have made for funding, and supportive following recent events.

In terms of my plan for South Yorkshire Police moving forward, in order to regain the trust and confidence of the public, there are a number of strands of work that have been initiated by the Interim Chief Constable and myself:

- College of Policing Peer Support with a team currently in Force led by DCC Andy Rhodes (of Lancashire Constabulary).
- Support in Examining the Financial Position of the Force
- Exploring different approaches to issues relating to Hillsborough
 potential prosecutions, misconduct proceedings and civil claims
- Exploring the best approach to Orgreave
- Support to the Office of the Police and Crime Commissioner with two projects – peer support aimed at strengthening my 'holding to account' arrangements, and a commissioned research project aimed at restoring public trust and confidence.

Finally, it is important to grasp the opportunity presented by the national support being made available and the arrival of a new Chief Constable to demonstrate to the public that the Force is willing to learn the lessons of recent events, especially the child sexual exploitation scandals and the Hillsborough Inquests, and to listen to victims, survivors, families and other interested groups who can help the Force begin the fundamental culture change necessary."

Councillor Otten submitted the following question:

"Do you and did you approve of the timing of the Acting Chief Constable's statement on Orgreave, being the day before the Police and Crime Commissioner election, in contravention of the spirit of 'purdah'?"

The Police and Crime Commissioner responded as follows:

"Councillor Otten is mistaken as to the date. The Interim Chief Constable made his statement on the day of the election so he did not contravene the spirit of 'purdah'. I did not know the Interim Chief Constable was going to make his statement. However, I do agree with his sentiments. South Yorkshire Police must approach the whole matter of Orgreave with the spirit of openness and cooperation."

Councillor Otten submitted a further question to the Police and Crime Commissioner:

"Given the Home Office guidance on the 'legal high' ban wherein the legality of buying whipped cream and antifreeze seems to depend on how old you are and what time of day it is, are you confident that police will be able to enforce this law in a fair and proportionate manner?"

In response, the Police and Crime Commissioner stated:

"I would expect South Yorkshire Police to enforce all laws in a fair and appropriate manner.

South Yorkshire Police has provided the following information:

"The new Psychoactive Substances Act provides a blanket ban on the production, supply and import of new psychoactive substances. The Act covers psychoactive substances which create a psychoactive effect by stimulating or depressing the person's central nervous system, effecting their mental functioning or emotional state. It does however, contain certain exemptions which include controlled drugs, medicinal products, nicotine and tobacco products, caffeine and food (including drink).

The legislation came into effect on 26 May 2016 and has since, changed the way forces tackle the issue of psychoactive substances. This Act is policed in a practical manner adopting a common sense approach and provides a variety of options to police forces to ensure it is enforced correctly. This includes, but is not limited to; powers to seize and destroy psychoactive substances, search persons, premises and vehicles and enter premises by warrant if necessary. There are provisions for civil sanctions: prohibition notices and prohibition orders — to enable the police and local authorities to adopt a proportionate response to the supply of 'legal highs' in appropriate cases. South Yorkshire Police are committed to reducing the harm caused by all drugs and are working with partner agencies to ensure prevention, education and health services all play a vital role in tackling psychoactive substances."

F9. THE 'DREW REVIEW' AND THE POLICE AND CRIME COMMISSIONER'S RESPONSE

Consideration was given to a report submitted by the Police and Crime Commissioner detailing the findings of the independent review by Professor John Drew in respect of South Yorkshire Police's response to child sexual exploitation (CSE). The Commissioner also set out his response to the review findings.

It was noted that the review had been announced in March 2015 and the following areas for review were identified:

- 1) Has the police response to safeguarding children and young people from child sexual exploitation been adequate in the past?
- 2) Has South Yorkshire Police (SYP) understood and acted on the findings of and recommendations in previous reports and inspections, in the media and during parliamentary questioning?
- 3) Is the police response to safeguarding children and young people from child sexual exploitation adequate now?

It was reported that Professor Drew's overall judgement was that the police response to safeguarding children and young people from child sexual exploitation in the past was inadequate, especially in Rotherham where he simply repeated the criticisms already made in the Jay and Casey reports. Professor Drew was satisfied that South Yorkshire Police had understood and acted both on the general direction of previous criticism and also on most of the specific recommendations of previous scrutiny activity of its performance. Furthermore, Professor Drew believed that the police response to safeguarding children and young people from child sexual exploitation was now adequate. Indeed, it was noted that some recent work undertaken by South Yorkshire Police appeared to be of high quality.

Panel Members noted the eleven recommendations from Professor Drew and the response of both the Police and Crime Commissioner and the Chief Constable to the review. The Panel welcomed the Commissioner's commitment to continuously hold South Yorkshire Police to account in delivering on the review's recommendations.

Discussions range from the need to continue rigorous scrutiny of South Yorkshire Police and local authorities to how the nature of CSE was moving from the streets to an online problem. Reference was made to the review of licensing policies in the authorities across South Yorkshire and the introduction of mandatory training on identifying CSE.

In view of the recent changes in personnel at the top of South Yorkshire Police, the Panel sought assurances that recommendation 9, in respect of a standard operating procedure for the investigation of CSE, had been progressed. The Police and Crime Commissioner indicated that the Interim Chief Constable had been tasked with reviewing this, as part of a thorough review of practices and operations at South Yorkshire Police.

In response to further questioning, the Police and Crime Commissioner explained that a lot of work was ongoing within South Yorkshire Police to raise consciousness of CSE and to improve the sharing of intelligence with other public bodies, such as local authorities.

The Panel recommended that the Police and Crime Commissioner submit reports providing updates on progress on a regular basis in respect of the implementation of the recommendations from the Drew Report.

Resolved:-

- 1. That the Drew Report and response of the Police and Crime Commissioner be received.
- 2. That the Police and Crime Commissioner be requested to provide update reports on the implementation of the recommendations arising from the Drew Report to future meetings of the Panel.

F10. THE POLICE AND CRIME COMMISSIONER'S INITIAL RESPONSE TO THE HILLSBOROUGH INQUESTS VERDICTS

The Panel agreed to defer consideration of this item until after Members had completed their induction.

Resolved:-

That the item be deferred to a future meeting.

F11. PROCEDURE TO BE FOLLOWED IN RESPECT OF THE POLICE AND CRIME COMMISSIONER'S PROPOSAL TO CALL FOR THE CHIEF CONSTABLE'S RETIREMENT OR RESIGNATION

The Panel agreed to defer consideration of this item until after Members had completed their induction.

Resolved:-

That the item be deferred to a future meeting.

F12. PROCEDURE TO BE FOLLOWED IN RESPECT OF THE APPOINTMENT OF A NEW CHIEF CONSTABLE

The Panel agreed to defer consideration of this item until after Members had completed their induction.

Resolved:-

That the item be deferred to a future meeting.

F13. COMPLAINTS CONCERNING THE CONDUCT OF THE FORMER POLICE AND CRIME COMMISSIONER

Consideration was given to a report which informed the Panel of its options in relation to the complaints received in respect of the conduct of the former Police and Crime Commissioner, in accordance with the Panel's decision at its previous meeting.

It was reported that two complaints were received in October 2015 to the effect that the previous PCC had mislead in his evidence to the Home Select Committee. As it appeared that the complaint may have referred to the commission of a criminal offence, in accordance with the Panel's complaints procedure, the complaints were referred to the Independent Police and Crime Commission (IPCC). In March 2016, the IPCC referred the complaints back to the Panel on the basis that the IPCC had obtained legal advice to the effect that deliberately misleading a Select Committee was not in fact a criminal offence, but if proved would be a contempt of Parliament. As such the IPCC stated that it was not necessary for them to investigate the complaint.

The Panel's complaints procedure provided for complaints received by the Panel to be resolved through the mechanism referred to as "Informal Resolution", which is a way of dealing with a complaint by solving, explaining, clearing up or settling the matter directly with the complainant, without an investigation or formal proceedings. The method of informal resolution is left up to the individual PCP, provided that it is in accordance with the Regulations and guidance issued by the Secretary of State.

It was reported that there was little prospect of an informal resolution being successful and there was no requirement for the former PCC to engage with with a sub-committee and there would be no sanctions which the Panel could impose. It was reported that an alternative option for the Panel would be to refer the complaint to Parliament, although it was noted that Parliament's powers in respect of contempt tended to be used very sparingly.

The Panel discussed the importance of responding to the issues raised by the complainants, but noted the lack of options available in providing redress. Consequently, the Panel concluded that the complaints should be referred to the Clerk of the Home Affairs Select Committee.

Resolved:-

- 1. That the report be noted.
- That, in principle, the complaints in respect of the former Police and Crime Commissioner of South Yorkshire be referred to the Clerk of the Home Affairs Select Commission, subject to a further check with the Monitoring Officer at the Office of the Police and Crime Commissioner.

F14. POLICE AND CRIME PANEL - FUTURE WORK PROGRAMME

It was reported that a work programme planning session involving all Panel Members would be convened in due course. Panel Members requested that the work programme from the previous municipal year be circulated for information.

Resolved:-

That the position in respect of the work programme be noted.

F15. DATE AND TIME OF THE NEXT MEETING AND FUTURE MEETINGS

It was noted that the next meeting of the Police and Crime Panel would be held on Tuesday 28 June 2016 for the purposes of considering the recommendation from the Police and Crime Commissioner in respect of the appointment of a new Chief Constable of South Yorkshire Police. Members were advised that the time of the meeting would be confirmed in writing at a later date.

POLICE AND CRIME PANEL Friday 8 July 2016

Present:-

Barnsley MBC

Councillor R. Frost

Rotherham MBC

Councillor S. Sansome

Sheffield CC

Councillor J. Drayton Councillor T. Hussain (in the Chair) Councillor J. Otten Councillor M. Rooney

Co-opted Members

Mr A. Carter Mr S. Chu

Apologies for absence were received from:

Councillor D. Griffin (Barnsley MBC)

Councillor A. Jones (Doncaster MBC)

Councillor C. McGuiness (Doncaster MBC)

F17. DECLARATIONS OF INTEREST

There were no declarations of interest.

F18. EXCLUSION OF THE PRESS AND PUBLIC

The Chair indicated that he did not propose to exclude the press or public from the meeting unless it was necessary to discuss issues which would require the disclosure of exempt information.

F19. PROPOSED APPOINTMENT OF A CHIEF CONSTABLE FOR SOUTH YORKSHIRE - CONFIRMATION HEARING

The Chair welcomed Panel Members, the Police and Crime Commissioner and the preferred candidate for the role of Chief Constable, Mr. S. Watson, as well as members of the public in attendance, to the meeting. He also apologised to the Police and Crime Commissioner and Mr. Watson for the need to re-schedule the meeting to ensure that a sufficient number of members could attend in order for the Panel could exercise its statutory powers.

The Panel considered a report from the Police and Crime Commissioner setting out his proposal to appoint a new Chief Constable for South Yorkshire Police, Mr Stephen Watson, in accordance with the requirements of the Police Reform and Social Responsibility Act 2011. The Police and Crime Commissioner provided a brief overview of the recruitment and selection process that had been undertaken and explained that the key characteristics that were required from the postholder included the authority to build and rebuild the public trust, and confidence in South Yorkshire Police and lead fundamental change and inspire the workforce

The Panel asked the Police and Crime Commissioner to explain why Mr. Watson was the best candidate of those that had made it to the final stage of the process. Dr. Billings explained that he had been impressed by Mr. Watson's ability to handle the media and understand a developing situation quickly. He also indicated that he had been impressed by the way in which Mr. Watson had appreciated how reputational issues affecting South Yorkshire Police had impacted on the morale of the organisation and what he would do in order to improve morale and the reputation of the Force. The Panel also sought assurances from the Police and Crime Commissioner that the proposed appointment would not be a short term fix. In response, Dr. Billings cited a number of long-term issues that required resolution and that the contract for the new Chief Constable would cover a five year period. He was satisfied that Mr. Watson was the best candidate to address the challenges that lay ahead and put right the reputation of the force both locally and nationally.

In order to make a recommendation to the Police and Crime Commissioner, the Panel asked questions of Mr Watson and initially sought further information on the qualities that he would bring to the role. In response, Mr Watson set out his career history and outlined specific examples of high profile policing activity that he had led or been involved in throughout his career.

Members sought to understand from Mr Watson how he would begin to change the culture of the force and address legacy issues arising from the Hillsborough tragedy, Orgreave and child sexual exploitation. Mr Watson indicated that it would require a cultural shift within South Yorkshire Police and one which returned to old fashioned behaviours which had previously engendered trust and confidence in the police. He categorically confirmed that understanding and learning from victim experience would be a lynchpin of the approach that he would embed within the force.

In response to questioning from Members, Mr Watson also confirmed that neighbourhood policing would be front and centre of his approach and acknowledged that the absence of neighbourhood police tended to lead to spikes in crime. The neighbourhood approach was cited as the principal form of intelligence for high performing policing cultures.

Mr Watson provided the Panel with examples of where the police had actively contributed to community cohesion and reducing tensions in the community and referred to his specific experience within the London Borough of Haringey at the time of the riots in the summer of 2011.

The Panel retired to consider their recommendation to the Police and Crime Commissioner in respect of his proposal to appoint Mr Watson and returned shortly to confirm its unanimous support for the appointment of Mr Watson. The Chair confirmed that the Panel looked forward to working with Mr Watson as the new Chief Constable of South Yorkshire Police and wished him well.

Resolved:-

That the Police and Crime Commissioner be advised that the Panel unanimously support his proposal to appoint Mr. Stephen Watson as the Chief Constable of South Yorkshire Police.



REPORT TO SOUTH YORKSHIRE POLICE AND CRIME PANEL

1.	Meeting:	Police and Crime Panel
2.	Date:	28 October 2016
3.	Title:	Annual Report
4.	Organisation:	Office of the Police and Crime Commissioner for South
		Yorkshire

5. Summary

The Police Reform and Social Responsibility Act (2011) requires the Police and Crime Commissioner (PCC) to produce a report ("an annual report") on:

- a) the exercise of the body's functions in each financial year, and
- b) the progress which has been made in the financial year in meeting the police and crime objectives in the police and crime plan.

As soon as practicable after producing an annual report, the PCC must:

- send the report to the relevant police and crime panel
- attend before the panel at the public meeting arranged by the panel in accordance with section 28(4), to
 - a) present the report to the panel, and
 - b) answer the panel's questions on the report

The PCC must:

- give the panel a response to any report or recommendations on the annual report (see section 28(4), and
- publish any such response

It is for the police and crime panel to determine the manner in which a response to a report or recommendations is to be published in accordance with subsection (4)(b).

The PCC must determine the manner in which an annual report is to be published and arrange for its publication.

6. Recommendations

It is recommended that the Police and Crime Panel receives the draft Annual Report attached at Appendix A and provide comment to the PCC by 4 November 2016.

7. Proposals and details

The PCC's Annual Report provides details of how the PCC has exercised his statutory responsibilities as well as a summary of the progress made in meeting the priorities in the Police and Crime Plan.

8. Finance

This report relates to the financial year 2015/16.

9. Background Papers and Consultation

All background papers used in the preparation of this report are available for inspection at the Office of Police and Crime Commissioner, Carbrook House, Carbrook Hall Road, Sheffield, S9 2EH

10. Contact

Name: Erika Redfearn
Position: Head of Governance

Organisation: Office of the Police and Crime Commissioner

Contact Details: 0114 2964132, eredfearn@southyorkshire-pcc.gov.uk



ANNUAL REPORT 2015/16

Page 18

Contents

Foreword	3
Police and Crime Plan 2013 /17	4
The Strategic Priorities	5
Key Achievements and Challenges	5
Protecting Vulnerable People	5
Tackling Crime and Anti-social Behaviour	6
Enabling Fair Treatment	8
Financial position and Budget Challenges 2015/16	9
Governance and Accountability	10
The Police and Crime Panel	11
Looking ahead – 2016/17	12
APPENDICES	13
Appendix 1: Holding to Account	14
Appendix 2: Helping me undertake my role	15

Page 19

Foreword

This is the second Annual Report I have produced since becoming Police and Crime Commissioner in November 2014. It summarises some of the work I have carried out during the year 1 April 2015 to 31 March 2016, including the progress made in delivering the priorities set out in the Police and Crime Plan.

In some respects, this was not an easy year. A lot of time had to be devoted to some of the so-called 'legacy' issues of child sexual exploitation (CSE) and the Hillsborough Inquests.

The former involved ensuring that the force had appropriate staffing levels and training for those working in the Public Protection Unit. In addition, the costs had to be managed, especially as the National Crime Agency began its work looking into the non-recent CSE cases highlighted in the Jay and Casey Reports. The Victims, Survivors and their Families Panel that I set up was able to help the force understand the needs of victims of these crimes better. I thank the panel and the officers who volunteered to help for their commitment. In addition I commissioned a Review of what the force had done in all parts of South Yorkshire to assure myself that nothing like Rotherham had happened elsewhere. Professor John Drew was able to give me that assurance while pointing to further measures that would need to be taken. I thank him and all the other individuals and agencies that co-operated in producing that review.

The Hillsborough Inquests continued at Warrington until after the financial year. The cost of supporting some of the legal teams (as I was obliged to do) was very taxing given the constraints on budgets. I thank my Chief Executive and Chief Finance Officer and their staff for the huge amounts of work that went into challenging lawyers' fees, getting costs down and pursuing Special Grants from the Home Office. This is the sort of essential activity that goes on but is largely unseen by the general public. But even when the inquests have come to an end, there will be further consequences that will occupy us for some time to come.

Just after the end of the year summarised in this report I, along with the Interim Chief Constable at that time, commissioned a Peer Review of the force. Twenty two police officers and staff from across the country came in, talked to staff, and produced a very frank and hard-hitting report. It was not an easy read, but it does provide the in-coming Chief Constable with a clear understanding of what needs attention.

It has not all been difficult! During the year I have met many members of South Yorkshire Police, both officers and staff, not least at awards ceremonies, whose hard work and dedication has been exemplary. The force has felt nervous about saying too much publicly about the good work it does because of the criticism it has received. This is a pity and my fervent hope is that with a new Chief Constable, building a new leadership group, we will be able to move on and feel confident enough to put before the public of South Yorkshire some of those examples of good policing.

I have also met partners in the local authorities, Fire and Rescue, the NHS, the criminal justice world and the community and voluntary sector. We have all agreed that the future for all of us lies in forging better working partnerships. In the coming year this is one area where we must make swifter progress.

I am currently renewing the Police and Crime Plan, based on what I have heard from the public through my many engagements this past year. Yorkshire people are not reticent in saying what they think, and I thank them for that. In particular they have highlighted the need for work to be done on getting local policing right. I shall work with the new Chief Constable and other partners to ensure that services are delivered as efficiently and effectively as possible.

Dr Alan Billings
Police and Crime Commissioner

Police and Crime Plan 2013 /17 (Renewed March 2015)

The Police and Crime Plan 2013-17 sets out my aim and strategic priorities for policing and crime services in South Yorkshire. It was renewed in 2015. It shapes my commissioning activity with the Force, and other community safety and criminal justice partners, so as to deliver efficient and effective services.

The Aim

South Yorkshire will be and feel a safe place to live, learn and work

The Strategic Priorities

Protecting Vulnerable People

- Effective action tackling child sexual exploitation.
- Reduction in the vulnerability of individuals within the community.
- Effective response to new and evolving threats to the most vulnerable people.
- Nationally recognised good practice in protecting vulnerable people from harm.

Tackling Crime and Anti-Social Behaviour

- Effective action tackling crime and anti-social behaviour.
- Targeted response to those that cause most harm in the community and intervention with others before they enter the criminal justice system.
- Prioritising the crime and behaviours that cause the most harm in the community.
- The right outcomes for victims of crime and anti-social behaviour.

Enabling Fair Treatment

- Integrity in all actions, reflecting the national policing 'Code of Ethics'.
- Engagement that actively seeks to implement public feedback in delivering police services.
- Services to those most in need of them, ensuring a visible presence in the areas where this will have the most impact.
- Services that inspire trust in the general public.



The Strategic Priorities

Key Achievements and Challenges

This section provides an overview of the key achievements and challenges we encountered in delivering the Police and Crime Plan priorities.

Protecting Vulnerable People

Protecting the public is one of the most important aspects of policing. People who find themselves vulnerable, whether as a result of their age, disability, health, gender, sexual orientation, ethnicity or religion, are potentially more at risk of becoming a victim of crime.

As a result of the issues around child sexual exploitation in Rotherham, I provided funding to the Force to put additional staff into the Public Protection Unit and improve training. I also set up an Independent Advisory Panel of Victims, Survivors and their Families to work with the police to help them design and improve services. In addition I appointed Professor John Drew to lead an Independent Review looking at how the Force had handled reports of child sexual exploitation across the county. It is significant to note that those individuals responsible for grooming, raping and abusing teenage girls in Rotherham are being, and will continue to be brought to justice for these heinous crimes.

In the past year the Force has experienced an increase in the reporting of hate crime, but national surveys suggest there continues to be an under reporting of these crimes to the police. More work needs to be done in building the trust and confidence of victims to come forward. Last year there were over 23,000 domestic incident calls to the Force with around a quarter of victims reporting two or more incidents. This trend in repeat victims is increasing and I will ensure that this is included as a consideration when determining future priorities and outcomes for the Police and Crime Plan.

As with child sexual exploitation and hate crime it is important that victims are believed, something the Force did not always get right in the past. I will continue to work with the Chief Constable to ensure the needs of the victims are paramount when designing changes in service delivery, systems and processes.

Protecting the vulnerable is not something the police can do on their own though. It



requires a holistic approach from all the agencies involved. To further encourage this approach I have provided financial support through my commissioning and grant giving activity. This includes projects such as Safe@Last (support for people at risk of running away), the 'Together Pathways Project' (support for people with mental health issues), the Doncaster Sex Worker Strategy and support the Haven House project which

provides a safe space for after-school sessions for homeless children and young people living in refuges in Sheffield.

Other commissioning activity that has helped to deliver key services to victims of crime, including the setting up of a sexual assault referral centre. The South Yorkshire Sexual Adult Referral Centre was officially opened on Friday, 9 September by Sarah Champion MP and Dr Alan Billings, South Yorkshire Police and Crime Commissioner.



The Sexual Assault Referral Centre (SARC) is for adult victims of sexual assault from the whole of South Yorkshire. It is managed by Mountain Healthcare and is part of a new Yorkshire and the Humber regional SARC service, where each region has its own centre.

The building is based in Sheffield and provides a range of services including facilities for forensic medical examination and crisis support. The building also houses facilities where vulnerable witness video interviews can take place.



When meeting local community groups, local teams. MPs, councillors. medical policing professionals, teachers and many members of the public I hear time and time again about the growing use of legal highs. Young people in particular are most affected and often do not understand the possible consequences for their immediate health and well-being as well as their future prospects. In October last year I launched a social media campaign to raise awareness of the dangers of taking legal highs which was supported by local football clubs and other sports related Since that campaign began, the organisations.

manufacture and sale of legal highs has been made illegal. But the dangers still persist.

Tackling Crime and Anti-social Behaviour

Overall crime levels in South Yorkshire increased by 9% (+8,645) between April 2015 and March 2016. Whilst this was not good news, it was in line with increases seen in other Force areas.

The greatest increases in crime recording were in relation to sexual offences and direct physical harm. This could be because more people are coming forward to the police to report these crimes, but we need to be sure. Further work is underway to help the Force better understand the reasons for these increases. This will provide a more accurate picture of the demand for policing services so that the right resources can be allocated.



One of the biggest decreases in crime levels has been in burglary. This improvement has been brought about by a combination of targeted offender management, media campaigns such as the Be Wise summer safety campaign and a sustained focus on long-term problem solving.

Although serious and organised crime (SOC) is often thought of in a regional, national or international context, its impact is most felt by local communities. It harms individuals, families and local businesses alike. South Yorkshire has a number of Organised Crime Groups and Urban Street Gangs with many linked to drugs and firearms activity. The Force and partner agencies are working together to identify and then disrupt these groups activities.

Anti-social behaviour (ASB) continues to be an issue for communities in South Yorkshire with over a quarter of the public surveyed indicating that ASB is a problem in their area. I have provided funding to the Barnsley Community Safety Partnership so that an enhanced out of hours service around ASB could be supported. Similar funding in Sheffield was used to maintain ten additional PCSO posts who work across the city focussing on early intervention to prevent crime and ASB. Powers around the right for victims of ASB to request a review of their case, often known as the 'Community Trigger' have also been established. I recognise there is further work needed to ensure victims are made aware of their right of review, and will continue to encourage the Force to work with local authorities in this regard.

Through my commissioning activity I have also provided funding to support Drugs Intervention Programmes (DIP) that help individuals within the criminal justice system access the right treatment.



Supporting victims of crime to recover and move on is a key part of my role and making restorative justice (RJ) available is one of the best ways to do it. RJ involves bringing the victim and offender together in a safe and managed environment - where both are willing. This gives the victim an opportunity to hear the offender admit the crime, tell the offender how they feel, how the crime has affected them and to receive an apology.

Not all victims or offenders want to do this, but some do. It gives back to victims a measure of control and allows offenders to show remorse and sometimes make reparations. The provision of this service is being supported by a Ministry of Justice grant and is a partnership initiative led by the South Yorkshire Criminal Justice Board.

In June 2015, I launched the RJ Hub and dedicated website where victims are provided with the opportunity to make an informed choice as to whether RJ is something they wish to consider. Victims are encouraged to self-refer themselves in to the service The launch of the Restorative Justice Hub and the dedicated website means that more victims will have the opportunity to make an informed choice if restorative

Restorative Justice gives victims the chance to tell offenders the real impact of their crime, get answers to their questions and get an apology.



For more information call our helpline on 0800 561 1000, text SYRJ to 82055 for a call back or visit www.restorativesouthyorkshire.co.uk

justice is something they wish to consider and demonstrates the commitment and vision the partners have to ensuring victims are placed at the heart of the justice process

Enabling Fair Treatment

The fair treatment of residents and communities in South Yorkshire is essential when designing and delivering policing and crime services. The national 'Code of Ethics' for policing puts fair treatment at the heart of everything the police do; it involves effective community engagement, listening to feedback and using it when making decisions, setting our priorities, and dealing with the public's concerns.

Fairness involves effective and representative community engagement, taking steps to listen to and understand our community, the levels of trust within it and actively try to increase that trust. It is also about the effective use of resources ensuring that the areas of most need are the areas the police are focussed on.

It has been, and continues to be, a challenging time for South Yorkshire Police with numerous issues, some of which are historic, impacting on how people view the Force both locally and nationally. Whist it is difficult to mitigate fully the impact of such issues it is important that the Force improves its engagement with, and understanding of, local communities. This will help to rebuild the reputation of South Yorkshire Police and restore the public's trust, confidence and satisfaction with the service as a whole. I will help the Force to do this. One place where we need to establish a better relationship is with the Orgreave Truth and Justice Campaign.



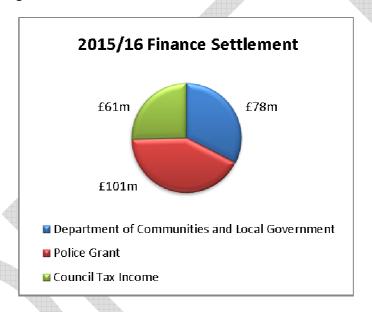
The public have long considered the visibility of their police Force to be of paramount importance. Investment through my office in new technology, including Toughbooks and new smartphones, has enabled officers to spend more time working within communities, rather than returning to the police station to update records.

Financial position and Budget Challenges 2015/16

The funding available to me in 2015/16 was £240m. This reflected a reduction of 4.83% compared to the previous year.

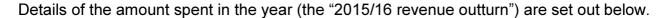
I made an increase of 1.95% to the police element of council tax - equivalent to additional £2.83 per annum for a Band D property. This increase was supported by the public, through my consultation with them, and agreed by the Police and Crime Panel. An additional £1.86m income was generated through this increase which equates to the approximate cost of 40 police officers on the street.

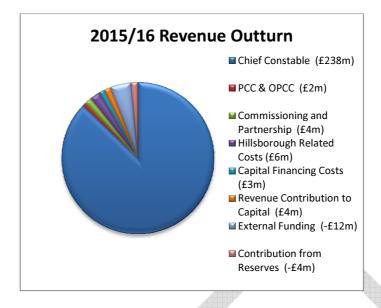
The sources of funding are set out in the chart below:



The majority of this £240m was allocated to the Chief Constable to meet the day to day running expenses of South Yorkshire Police. This funding met the costs of the salaries of police officers and support staff, the use and maintenance of vehicles and buildings, and the information technology that is used by the police.

During this year I was also faced with meeting costs associated with the Hillsborough Inquests. These amounted to approximately £6m. I was able to keep expenditure within available funds due to the provision of some financial assistance from Government for a proportion of the Hillsborough related costs.





Predicting the future involves an element of uncertainty. The expected formula funding review could result in distributional changes to the level of government grants in future years. The availability of the council tax increase 'flexibility' (3.3% increase permitted in 2016/17) in future years is also uncertain, as is the future legacy costs relating to the Hillsborough disaster, Child Sexual Exploitation, the events at Orgreave and policing protests.

Governance and Accountability

Ultimately I am answerable to the public of South Yorkshire.

My <u>website</u> provides a raft of information regarding the various aspects of my role. I capture through my blogs some of what I see, hear and understand from others about policing in South Yorkshire.

But wherever I go, and whatever the audience, everyone says they want to 'feel safe'. This is why the Police and Crime Plan sets out the aim – South Yorkshire will be and feel a safe place to live, learn and work. From this aim all other priorities then follow.

The Chief Constable and I have adopted a <u>Joint Corporate Governance Framework</u> which sets out the culture, values, systems and processes by which we operate. This Framework also enables me to monitor the delivery of my Police and Crime Plan priorities and assess whether effective services are being delivered that provide value for money. Examples of how I challenge and scrutinise South Yorkshire Police (SYP) and partner performance are set out at Appendix 1 to this Report.

I have recently updated my governance meeting structure to further improve how I set strategic direction and then hold the Force

and partners to account for the delivery of my Police and Crime Plan priorities and associated outcomes. Details of this meeting structure can be found at http://www.southyorkshire-pcc.gov.uk/Transparency/Meetings.aspx

All of the decisions I make are published on my website, as are minutes of key meetings and all other statutorily required information. This further demonstrates my commitment to being open and transparent with all the communities I represent.

The Police and Crime Panel play an important role in scrutinising my actions and decisions. I provide regular reports to the Panel and have actively included them in my key decisions around the budget, council tax precept and future priorities. The Panel includes councillors from each district of South Yorkshire (Barnsley, Doncaster, Rotherham and Sheffield) plus two co-opted independent members. Further information about the work of the Panel can be found at www.southyorkspcp.org.uk



Looking ahead – 2016/17

The last few months have been a difficult time for South Yorkshire Police. In the aftermath of the Hillsborough Inquests I suspended the substantive Chief Constable to consider a proposal to call for him to retire or resign. Shortly after that the Interim Chief Constable and I jointly commissioned a Peer Review, to build a rounded picture of how the Force was functioning overall. This Review identified a number of strategic strengths and weaknesses and offered a series of recommendations about what should now be done to make meaningful progress over the coming years.

The Peer Review is not the only improvement activity taking place, there are two other strands:

- · Public Engagement and Rebuilding Trust and Confidence; and
- Financial Stability with a new look at the legacy issues.

There will continue to be significant financial challenges ahead. It is anticipated that the financial settlement for 2017/18 will mean further cuts to the policing budget. This, coupled with the Government's intention to review and implement a revised funding formula from 2018, makes longer term financial planning extremely difficult.

Cuts in general to public sector budgets will drive increased partnership / collaborative working. Policing and other community safety resources will need to be prioritised. At the same time crime is also changing, both in its nature and complexity. The Force will need to adapt and change how it delivers services to help people feel and be safe.

With ever declining resources it is imperative that those available are maximised. I will be reviewing my commissioning and grant giving activity to be sure the organisations I fund are positively contributing to delivering the Police and Crime Plan priorities.

There are potential changes to my role when the Policing and Crime Bill is enacted. A radical reform of the police complaints and disciplinary process could bring with it greater responsibilities for me, as could plans for greater collaboration across the blue light services and proposals to develop a more holistic approach to criminal justice. Local authority devolution deals with government will also impact on my role, but it is too soon to say at this stage what this might mean in South Yorkshire.

So..... there are many challenges ahead, but in turn these create many opportunities. I intend to seize those opportunities and work together with the Force and partners to ensure that South Yorkshire feels and is a safe place to live, learn and work.

APPENDICES



Page 30

Appendix 1: Holding to Account

Set out below are some of the ways in which I challenge and scrutinise the performance of the Force and others commissioned to deliver the Police and Crime Plan strategic priorities.

- Receiving reports which show emerging trends and threats, what the police and partners are doing well, areas of concern and, importantly, what the police and partners are doing to address those concerns. These reports are presented in my Public Accountability Board meetings (previously known as the Governance and Assurance Board)
- Leadership Group an informal weekly meeting between the Chief Constable, my Chief Executive and Deputy Chief Constable chaired by myself. This meeting is informal, allowing a 'safe' space to discuss openly strategic issues, risks and opportunities in the present and future. This Group provides strategic direction.
- Once each month this Group extends its membership to include all members of my Senior Management Group and Force Senior Leadership Group so as to provide an opportunity for informal discussion between the two offices.
- Having informal conversations with frontline officers of all ranks to find out what is really happening.
- Receiving reports from volunteer Independent Custody Visitors who visit people detained in custody suites throughout South Yorkshire.
- Attending meetings of, and receiving reports from, my Advisory Panels to hear views and concerns direct from members of our communities across a range of subjects.
- Meeting with the Police Federation, Superintendents Association, Unison and Unite to discuss trade union and staff association issues.

Page 31

Appendix 2: Helping me undertake my role

I have a small team of dedicated staff that work alongside me to ensure my Plan is delivered and all of my statutory duties are met. This includes issues such as Freedom of Information requests, police appeal tribunals and access to information.

The Joint Independent Audit Committee ('JIAC')

The JIAC audits the work of my office and SYP. The Committee meets regularly to consider how we identify and manage strategic risks, review internal and external auditors reports and monitor annual governance actions. It also assists me in discharging statutory responsibilities in holding the Force to account.

The Independent Ethics Panel

I have an Independent Ethics Panel which ensures that the police are acting with integrity and high professional standards by scrutinising how they handle complaints, as well as following up some of the ethical concerns raised by the public. The Panel provides me and the police with independent and effective challenge.

Victims, Survivors and Families Panel

I have established a Victims, Survivors and their Families Panel so that the Force and I can hear directly from victims of crime about their experiences and where services are meeting needs, where they need improving or should be done in a different way.

Independent Policing Protests Advisory Panel

Following a report into the engagement of SYP with communities following a protest in Rotherham on 5 September 2015, I established an Independent Policing Protests Advisory Panel to work with SYP in the planning and learning stages of managing protests and marches.

The Panel will convene to provide advice to SYP when a group indicates it will be protesting on any issue within South Yorkshire. Members will support the Force by offering comment on proposals for handling the event and work with them in advance of any protest, as well as being in attendance to observe on the day and helping to learn lessons from the event and make recommendations for managing future protests.

Independent Custody Visitors

I run and Independent Custody Visiting Scheme, where members of the public visit police stations unannounced, to check that people held in custody are being treated properly. The people who carry out these visits are volunteers recruited from a variety of backgrounds and sections of the South Yorkshire community. They must be over 18 years of age.



REPORT TO SOUTH YORKSHIRE POLICE AND CRIME PANEL

1.	Meeting:	Police and Crime Panel
2.	Date:	28 October 2016
3.	Title:	Progress with the Peer Review
4.	Organisation:	Office of the Police and Crime Commissioner for South Yorkshire

5. What was the Peer Review

The Peer Review was commissioned by Police and Crime Commissioner and Interim Chief Constable Dave Jones in May 2016. It consisted of 22 officers with expertise from across a range of policing fields coming to South Yorkshire to assess the force against areas of national best practice and to talk to officers and staff about their experiences and view of the Force today.

6. What did it find?

The Review found that there had been "inconsistent strategic direction form the Chief Officer Team" and decision-making had been isolated, staff have not been listened to and action had not always been taken on agreed plans. Financial and operational planning had not been linked and there had been an underinvestment in key areas. A key finding was that there had been a disturbing move away form an effective neighbourhood policing model.

7. What were the recommendations?

- Stabilise the force for 0-6 months this includes looking at the following areas:
 - Strategic Change
 - Local Policing
 - o HR
 - Contact Management
 - o Intelligence on Child Sexual Exploitation
 - Engagement External
 - Chief Officer Team Capabilities
 - o Public Protection
- Transform 0-3 years it was suggested the following areas can be started in parallel with the stabilisation work but must be paced to avoid confusion:
 - Engagement Internal
 - Durham staff survey
 - Organisational Development

8. What has happened since May?

- Support is being provided from Lancashire and Kent police around demand management and analysis.
- Work is ongoing to develop a new Strategic Delivery Plan involving key senior managers in Force and wider consultation with the workforce, the public and partners. This will include the future operating model for the Force and key to this will be delivery of an effective neighbourhood policing model in coproduction with local partners.
- A review of HR Shared Services is imminent
- I have recruited an Assistant PCC to co-lead with the Force a project aimed at rebuilding public trust and confidence. The project is being scoped for delivery to start in the new year.
- The Durham staff survey has been launched to canvas views of the workforce to underpin the fundamental change required.

9. Background Papers and Consultation

All background papers used in the preparation of this report are available for inspection at the Office of Police and Crime Commissioner, Carbrook House, Carbrook Hall Road, Sheffield, S9 2EH

10. Contact

Name: Sally Parkin

Position: Business Manager

Organisation: Office of the Police and Crime Commissioner

Contact Details: 0114 2964137, sparkin@southyorkshire-pcc.gov.uk

SOUTH YORKSHIRE POLICE AND CRIME PANEL

1.	Meeting:	Police and Crime Panel
2.	Date:	28 th October 2016
3.	Title:	Report of the Legal Adviser – Update on the Operation the Complaints Procedure

4. Summary

To update the panel on the number of complaints received and the handling of complaints since the last report.

5. Recommendations

That the panel notes the actions that have been taken in respect of complaints

6. Proposals and Details

- 6.1 The two complaints received in respect of the previous Police and Crime Commissioner (PCC) have been referred to the Clerk to the Home Affairs Select Committee. The Clerk has responded by assuring the Panel that the Committee takes this matter extremely seriously and will respond further when the Committee has considered the issue.
- 6.2 The outcome of the Committee's consideration of the matter will be reported back to a future meeting of the Panel.
- 6.3 A Complaint has been received whereby the complainant is dissatisfied with how South Yorkshire Police (SYP) have dealt with his complaint. He appealed their decision to the IPCC who upheld SYP's decision. The complainant then wrote to the PCC. The initial complaint relates to how a crime is recorded.
- 6.4 The PCC is not responsible for complaints against officers and staff of SYP or for operational matters, these are the responsibility of the Chief Constable. The Office of the Police and Crime Commissioner initially wrote to the Complainant explaining that there was nothing further that the PCC could do to assist him in the matter, but the Complainant was dissatisfied with that response, and as such submitted a complaint. A review is being carried out by the OPCC as to whether the correct policies and procedures have been followed, and the complainant will be informed of the outcome.

7. Finance

None

049244 / 763478 Page 1

8. Risks and Uncertainties

None

9. Background Papers and Consultation

Files and correspondence held by the Legal Adviser.

Contact Name: Stuart Fletcher, Service Manager, Rotherham Borough Council. Telephone 01709 823523 or e-mail stuart.fletcher@rotherham.gov.uk

049244 / 763478 Page 2