

ACS Submission: Proposed Programme of Policing Inspections for 2020/21

ACS (the Association of Convenience Stores) represents over 33,500 local shops and forecourt sites including Co-op, McColls, BP and thousands of independent retailers, many of which trade under brands such as Spar, Costcutter and Londis. More information about ACS and the convenience sector can be found in Annex A.

Crime is the biggest operational challenge for convenience retailers. In the last year, crime against convenience stores cost an estimated £211m. The total cost of crime per store was £4,543, equivalent to a 7p crime tax on every customer transaction¹. Beyond the financial burden, retailers are facing increasing violent crime. ACS' Crime Report 2020: Evidence for Action estimated there were 50,338 incidents of violence and threats in the convenience sector last year. Our latest data shows that 87% colleagues experienced verbal abuse, 60% experienced threats of violence and 28% experienced physical violence in the last year, just for doing their job².

The top trigger for incidents of violence and abuse is shop theft, which remains the most prevalent form of crime in the convenience sector, presenting high costs to businesses. Retailers now perceive that 77% of shop thefts against their business are committed by repeat offenders who repeatedly target their stores, often motivated by a drug or alcohol addiction (52%). The Out of Court Disposals (OCD) system to issue fines and cautions to offenders does not tackle these root causes and can facilitate an escalation to violence. Violent incidents can be incredibly traumatic for individuals, causing not only physical injury but also significant emotional impacts which can leave members of staff afraid to return to work. Tackling high prevalence, low value crimes would support the police to identify repeat offenders before they advance to more serious crime. Therefore, we must ensure that police forces are not screening out or deprioritising shop theft offences.

Given the increasing scale and volume of incidents of violence against store colleagues, we would like HMICFRS to undertake a thematic review of the police's response to crime and violence against the retail sector. Our members report an inconsistent approach from police forces to recording and responding to retail crime and violence and are overwhelmingly dissatisfied with the response they receive. A thematic review would assess what approaches are most effective at tackling these crime types and how best to support victims.

We have answered the relevant consultation questions below. For more information on this submission please contact Eleanor.O'Connell@acs.org.uk.

Shape and scope of the programme for the rest of 2020/21

1. Does the revised programme seem reasonable and right?

Yes. It is reasonable to inspect the policing response to Covid-19, in particular policing practices in the enforcement of regulations during the pandemic and serious and organised crime. Retailers have adapted to respond to a number of new regulations including introducing social distancing measures in stores and the requirements for customers to wear face coverings. Convenience retailers experienced frustrations with the interpretations of regulations taken by police constabularies and were subject to fervent enforcement of social distancing measures, leading to some threats of store closures. For example, shop workers

¹ [ACS Crime Report 2020](#)

² ACS Colleague Survey 2020

had been stopped and challenged for evidence that they were going to work, which was not a requirement or advised within any form of government guidance. ACS had to produce [template letters](#) for retailers to give to colleagues to overcome this issue. Retailers were also asked to close their automated hand car washes on petrol forecourts, although these were allowed to remain open. The National Business Crime Centre has been a valuable stakeholder in communicating concerns across the police community, including on socially-distant queue management³ and the National Police Coordination Centre helped to improve consistency on the ground.

We would like HMICFRS to consider police forces' response to crime and violence in the retail sector under potential thematic inspections for 2021/22 and invite representatives from retail onto the Steering Group. Serious violence is a significant and increasing trend across the UK; and crime in the retail sector is becoming increasingly violent. The convenience sector alone saw 50,338 incidents of violence and threats, 18,399 robberies and almost 10,000 incidents involving a weapon in the last year⁴. Despite being recognised as key workers, violence and abuse towards people working in local shops increased throughout the Coronavirus pandemic; 40% of convenience retailers saw an increase in their stores since the start of lockdown, with shopworkers facing Covid-19 related threats, such as coughing and spitting⁵, particularly from offenders attempting to steal from stores.

This issue is increasing across the retail industry; the British Retail Consortium Crime Survey 2020⁶ found there were 424 violent or abusive incidents per day, an increase of 9% on the previous year. Usdaw's Freedom From Fear Survey also showed that during 2019, 400 shopworkers were assaulted every day⁷. The Home Office's Commercial Victimization Survey also estimated that in 2018, workers from the wholesale and retail sector were victim to around 590,000 incidents of assaults and threats⁸.

We believe that a thematic review would be a positive exercise in collating and understanding how different forces tackle crime and violence in the retail sector and identifying best practice, to promote a consistent response across all force areas.

PEEL inspection programme

2. What do you think of the proposed approach to assessing police forces in PEEL 2020/21? How could this be improved?

ACS welcomes the proposed introduction of a 'victim service assessment' focused on the experience of the service provided by forces to victims of crime. This must include an assessment of the experience of businesses who are victims of crime.

ACS' Crime Report 2020 found that retailers are overwhelmingly dissatisfied with the response they receive from police to crime against their business. 80% were dissatisfied with the ease of reporting a crime to the police, 84% were dissatisfied with the consistency of police response, 87% were dissatisfied with the time taken for police to respond to an incident, 91% were dissatisfied with police response to repeat offenders, 95% were dissatisfied with police investigation of an incident. Finally, 97% were dissatisfied with the sanctions issued to offenders.

³ <https://nbcc.police.uk/news/letter-from-the-nbcc-regarding-covid-19>

⁴ [ACS Crime Report 2020](#)

⁵ ACS Covid-19 Impact Survey

⁶ [British Retail Consortium, Crime Survey 2020](#)

⁷ USDAW 'Freedom from Fear' Survey 2019

⁸ [Home Office Crime against businesses: findings from the 2018 Commercial Victimization Survey](#)

These high levels of dissatisfaction may be in part driven by the lack of communication and contact from the police after a crime is reported. Whilst it may be the case that the crime is being investigated and a suspect arrested, retailers are not always updated and therefore perceive that nothing has been done. It is important that where there are updates, victims are informed. This would undoubtedly improve retailer's perception of police response and prevent underreporting.

Under the Victims' Code, businesses have the right to make an Impact Statement for Business (ISB) to communicate the impact of the crime on the business. However, ACS' Voice of Local Shops polling of 1,200 convenience retailers in February 2019 found that only 40% of retailers who reported a violent incident to the police were made aware of the option to make an ISB⁹. ISBs must be offered by police to every business for every crime reported and individuals involved must be offered a Victim Personal Statement.

Retailers who are victim to crime also report issues with crime allocation. Many forces have introduced monetary thresholds for shop theft offences, meaning that police will not respond unless an offence exceeds this threshold. These monetary thresholds exclude some retail businesses from receiving a response from the police. For convenience stores, the average spend per customer is £6.38, making it difficult to reach a monetary threshold of £50 or £100. Repeat offenders also understand that if they work beneath these thresholds, they will not be reprimanded, meaning that convenience stores are often repeatedly victimised by the same individuals. The criteria for receiving a police response to a crime must not only consider volume or value but should also account for use of violence or abuse of staff, criminal damage and repeat victimisation.

- a. Does the draft inspection methodology include the right inspection areas to gather evidence for a rounded assessment of police forces? How could this be improved?**

Yes.

- b. Do you agree with the proposal to make judgments based on the characteristics of 'Good', causes of concern and areas for improvement?**

Yes.

- c. Do you agree with the proposal to provide judgments at the core question level only?**

Yes.

- d. Which of our proposals, four or five tiers of judgments, do you think will most promote improvements in policing?**

A five-tier structure would promote further improvements in policing for those forces currently stable in 'Good' to seek to continuously improve across a range of areas.

- e. Do you have any comments on our proposed approach to inspecting partnership and collaboration arrangements?**

No.

⁹ ACS Voice of Local Shops Survey February 2019

Annex A

ABOUT ACS

The Association of Convenience Stores lobbies on behalf of over 46,000 convenience stores across mainland UK on public policy issues that affect their businesses. ACS' membership is comprised of a diverse group of retailers, from small independent family businesses running a single store to large multiple convenience retailers running thousands of stores.

Convenience stores trade in a wide variety of locations, meeting the needs of customers from all backgrounds. These locations range from city centres and high streets, suburban areas such as estates and secondary parades, rural villages and isolated areas, as well as on petrol forecourts and at travel points such as airports and train stations.



WHO WE REPRESENT

INDEPENDENT RETAILERS



ACS represents almost 19,000 independent retailers, polling them quarterly to hear their views and experiences which are used to feed in to Government policy discussions.

These stores are not affiliated to any group, and are often family businesses with low staff and property costs. Independent forecourt operators are included in this category.

SYMBOL GROUPS AND FRANCHISES



ACS represents over 14,000 retailers affiliated with symbol groups. Symbol groups like SPAR, Nisa, Costcutter, Londis, Premier and others provide independent retailers with stock agreements, wholesale deliveries, logistical support and marketing benefits.

Symbol group forecourt operators and franchise providers like One Stop are also included in this category.

MULTIPLE AND CO-OPERATIVE BUSINESSES



ACS represents over 13,000 stores that are owned by multiple and co-operative retailers. These businesses include the Co-Operative, regional co-operative societies, McColls and others.

Unlike symbol group stores, these stores are owned and run centrally by the business. Forecourt multiples and commission operated stores are included in this category.

THE CONVENIENCE SECTOR



In 2019, the total value of sales in the convenience sector was £40.3bn.

The average spend in a typical convenience store transaction is £6.38.



There are 46,388 convenience stores in mainland UK. 71% of stores are operated by independent retailers, either unaffiliated or as part of a symbol group.



The convenience sector provides flexible employment for around 405,000 people.

18% of independent/symbol stores employ family members only.



19% of shop owners work more than 70 hours per week, while 17% take no holiday throughout the year.

70% of business owners are first time investors in the sector.



Convenience stores and Post Offices poll as the two services that have the most positive impact on their local area according to consumers and local councillors.

78% of independent/symbol retailers have engaged in some form of community activity over the last year.



Between August 2018 and May 2019, the convenience sector invested over £633m in stores.

The most popular form of investment in stores is refrigeration.

OUR RESEARCH

ACS polls the views and experiences of the convenience sector regularly to provide up-to-date, robust information on the pressures being faced by retailers of all sizes and ownership types. Our research includes the following regular surveys:

ACS VOICE OF LOCAL SHOPS SURVEY

Regular quarterly survey of over 1,200 retailers, split evenly between independent retailers, symbol group retailers and forecourt retailers. The survey consists of tracker questions and a number of questions that differ each time to help inform ACS' policy work.

ACS INVESTMENT TRACKER

Regular quarterly survey of over 1,200 independent and symbol retailers which is combined with responses from multiple businesses representing over 3,000 stores.

ACS LOCAL SHOP REPORT

Annual survey of around 2,400 independent, symbol and forecourt retailers combined with responses from multiple businesses representing 7,556 stores. The Local Shop Report also draws on data from HIM, IGD, Nielsen and William Reed.

BESPOKE POLLING ON POLICY ISSUES

ACS conducts bespoke polling of its members on a range of policy issues, from crime and responsible retailing to low pay and taxation. This polling is conducted with retailers from all areas of the convenience sector.

For more information and data sources, visit www.acs.org.uk