ACS Submission – HMICFRS's 2019/20 Policing Inspection Programme and Framework

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the HMICFRS Policing Inspection Framework. ACS represents 33,500 local shops across the UK including the Co-Op, Spar, One Stop and thousands of independent retailers. More information about ACS and the convenience sector can be found in Annex A.

Crime is the biggest operational challenge for convenience retailers. In 2018, crime against convenience stores cost an estimated £193m. The total cost of crime per store was £3,873, equivalent to a 7p crime tax on every customer transaction[1]. Shop theft remains the most prevalent form of crime in the convenience sector, presenting the highest cost to businesses.

Shop theft is the number one trigger for violence and abuse of store colleagues in convenience stores. Therefore. we want to ensure that police forces are not screening out or deprioritising shop theft offences. ACS' Crime Report 2018 estimated there were 13,437 incidents of violence in the convenience sector last year. 39% of these incidents resulted in the injury of staff and 72% of store colleagues also reported they had experienced verbal abuse in the last year[2]. The increase in the prevalence of violence in the retail sector is supported by the Home Office's Commercial Victimisation Survey (CVS)[3].

Given the challenges the retail sector faces from crime and violence against store colleagues, we would like HMICFRS to consider undertaking 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. A thematic review would assess what approaches are most effective at tackling these crime types and how best to support victims. We believe that a focus on tackling high prevalence, low value crimes would support the police to identify repeat and entry level offenders at the earliest opportunity before they advance to more serious crime.

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

1. **Are there any significant new or emerging problems in or for policing which HMICFRS should take into account in its effectiveness, efficiency and legitimacy inspections?**

Retail crime and violence against people working in the retail sector is increasing. As there is more pressure on police forces' resources and availability, forces must consider how they will respond to issues like shop theft and violence. This will inevitably need to be achieved through closer collaboration with businesses and better reporting systems. Our members report there is a fragmented approach to tackling retail crime, with each force taking a different approach or forces choosing to screen out certain offences.

The key finding from our report is about the triggers for violence and abuse in stores. It shows that low level offences, like shop theft, can quickly escalate to more serious and often violent crime. The ACS Crime Report 2018 found that shop theft is the number one trigger for violence and abuse in convenience stores. The other triggers for violence and abuse are store colleagues enforcing age restrictions and refusing to serve intoxicating customers.

A report by the Centre for Social Justice, *Desperate for a Fix*, estimates that 70% of shop theft offences are carried out by prolific offenders with drug or alcohol addictions[4]. The Centre for Social Justice suggested a more robust approach to tackling repeat offenders was needed, through the development of a 'Second Chance' programme, that seeks to address the root cause of the offender's problem[5]. This has implications for police forces' use of sanctions such as Out of Court Disposals and whether they are sufficient in dealing with prolific offenders.

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[1] ACS Crime Report 2018
[2] ACS Crime Report 2018
[3] Home Office Commercial Victimisation Survey 2017
[4] Centre for Social Justice, 'Desperate For a Fix', June 2018
[5] Centre for Social Justice, 'Desperate For a Fix', June 2018

Our members report that many forces introduce monetary thresholds for shop theft offences, meaning that police will not respond unless an offence exceeds this threshold, which ranges from £50 to £100. These monetary thresholds are an unhelpful approach on several different levels. Firstly, monetary thresholds inevitably exclude some retail businesses from receiving a response from the police. For convenience stores, the average spend per customer is £6.50, making it difficult to reach the monetary threshold. Secondly, monetary thresholds embolden shop thieves, who are often repeat offenders, and understand that if they work beneath these thresholds, they will not be reprimanded. Finally, the criteria for receiving a police response to a crime must account for several factors; use of violence or abuse of staff, criminal damage, repeat victimisation and value.

The increase in shop theft and associated violence is escalating and HMICFRS should be contemplating the implications for police forces.

2. **Do the proposed thematic inspections of counter-terrorism, older people in the criminal justice system, cyber-crime, child protection and crime data integrity cover areas that are of most concern to you at the moment?**

Violent crime committed against store colleagues in the convenience sector is the number one concern for convenience retailers. We would like HMICFRS to consider running a thematic inspection on how police forces address crime and violence in the retail sector. We believe that a thematic review would be a positive exercise in collating and understanding how different forces tackle crime and violence against the retail sector and what works best.

The Home Office's Commercial Victimisation Survey estimated that in 2017, workers from the wholesale and retail sector were victim to around 510,000 incidents of assaults and threats, more than twice the number recorded in 2016 (203,000 incidents)[6]. The British Retail Consortium Crime Survey[7] found that the rate of reported violence with injury doubled in the last year to 6 incidents per 1000 workers. The Interim results of Usdaw's Freedom From Fear Survey show that during 2018: 6 in 10 shopworkers experienced verbal abuse, 37% were threatened by a customer, with over 230 assaulted every day[8].

3. **How else could HMICFRS adapt the way in which it acquires information, to take account of current circumstances and risks to public safety?**

There are numerous sources of industry data HMICFRS could draw upon to understand the extent of the problem of crime and violence in the retail sector, including; ACS' Crime Report 2018, BRC Retail Crime Survey 2017, Usdaw's Freedom From Fear Survey and the National Business Crime Solution data. These surveys suggest much higher levels of violence and crime than the police recorded crime data suggests.

We have recommended that the Home Office use the expertise within the Commercial Victimisation Survey team to analyse all reputable industry and policing retail crime data sources. This would create the most comprehensive assessment of the crime and violence challenges in the retail sector.

The Home Office will very shortly be publishing a consultation on how to tackle violence against people working in the retail sector. This will provide HMICFRS with a positive understanding of the extent of the challenges faced by the retail sector and police.

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[6] Home Office Commercial Victimisation Survey 2017
[7] British Retail Consortium, 2017 Retail Crime Survey
[8] USDAW 'Freedom from Fear' Interim Results

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.

ACS | the voice of local shops

WHO WE REPRESENT

INDEPENDENT RETAILERS

ACS represents over 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 12,000 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 2018, the total value of sales in the convenience sector was £39.1bn.

The average spend in a typical convenience store transaction is £6.50.

There are 46,262 convenience stores in mainland UK. 72% of stores are operated by independent retailers, either unaffiliated or as part of a symbol group.

The convenience sector provides flexible employment for around 365,000 people.

24% of independent/symbol stores employ family members only.

24% of shop owners work more than 70 hours per week, while 19% 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.

81% of independent/symbol retailers have engaged in some form of community activity over the last year.

Between August 2017 and May 2018, the convenience sector invested over £814m 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 over 2,400 independent, symbol and forecourt retailers combined with responses from multiple businesses representing 7,669 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