

4 BROOK END
WESTON TURVILLE
AYLESBURY
BUCKS
HP22 5RF

Adrian Neighbour. B.Sc(Hons) MBA

E-mail: adrianneighbour@gmail.com

The Chief Executive
Office of the Thames Valley Police and Crime Commissioner
Police Headquarters
Oxford Road
Kidlington
OX5 2NX

15th July 2013

Dear Sir/Madam,

Complaint – Police & Crime Commissioner

I write to formally complain about the Police & Crime Commissioner (PCC) for the Thames Valley in failing to properly discharge his statutory duties as PCC, namely,

1. To hold TVP to account in the exercise of its functions
2. To ensure VFM is being achieved on behalf of the Tax-Payer
3. To act as a lightening conductor in respect of local public concerns.


I enclose all relevant correspondence concerning this matter, but the issues are perhaps best summarised in the conclusion of my letter dated 1st July 2013.

To re-iterate, the issues surrounding this matter serve as a litmus test concerning purpose and benefits of having an elected PCC and Mr Stansfeld's ability as PCC to carry public confidence.

By way of delineating the PCC's failure to properly question and hold to account TVP, I would draw the Panel's attention to the content of an e-mail dated 19th June 2013 sent by the PCC's own Business Manager. This typifies the PCC's willingness to accept at face value what he is being told by TVP, and his failure to properly question, scrutinise or to act in the public interest; this despite a considerable weight of damning evidence and incendiary admissions made by TVP.

I await the outcome of the Panel's decision in this matter.

Yours faithfully,



Adrian Neighbour

P.S: I would be grateful if you could acknowledge safe receipt of this complaint.

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E-mail: adrianneighbour@gmail.com

Anthony Stansfeld
Office of the Police and Crime Commissioner
The Farmhouse
Thames Valley Police Headquarters
Oxford Road,
Kidlington
OX5 2NX

1st July 2013

Dear Mr Stansfeld,

Scrutiny of TVP Speed Camera Scheme in Buckinghamshire.

The following sets out my response to your e-mail received on 25th June 2013, which in turn was sent in response to my letter dated 2nd May 2013 and will form the basis of my complaint to the Police and Crime Panel.

1. Independent Analysis:

The issue of public confidence lies in your effectiveness as PCC to (i) hold TVP to account in the exercise of its functions; (ii) ensure VFM is being achieved on behalf of the Tax-Payer and (iii) act as a lightning conductor in respect of local public concerns.

Your sole response was to state for the public record that you will not comment on any independent analysis.

This is surprising given that the analysis is based on TVP's own data and served to flag up a poorly performing function. It is noteworthy that you did not take the opportunity to rebut the analysis and its evidential findings.

Your denial of the facts concerning the Scheme amounts to nothing less than **wilful blindness**. It constitutes a **gross dereliction of duty** as PCC to properly hold to account TVP in the exercise of its functions. It also raises searching questions as to your judgment and motivation for maintaining the status quo.

2. Targets:

The issue of public confidence lies in whether management of the Scheme can demonstrate value for money whilst improving road safety.

You state for the public record a one line response that the Scheme is not being managed at a strategic or operation level due to an absence of any performance measures or targets being set. What is truly staggering is your lack of reaction or concern to this damning admission.

You have nothing to say on what basis is the Scheme is to be overseen, how the Scheme is to be assessed in terms of contributions to road safety and how the operation of the Scheme is to be held to account in terms of its effectiveness, efficiency and economy.

Your lack of concern is made all the more disturbing given that under the powers given to the PCC you now have responsibility for managing sizeable public funds in the form of community safety budgets previously held by all unitary local authorities in the Thames Valley.

A published list of all performance measures and targets set in relation to the Scheme would have revealed the true character of the Scheme in terms of its emphasis and focus.

Having worked within a disciplined uniformed emergency service, I find the notion that personnel within the Scheme are not working towards, or being managed against, any agreed strategic objectives or personal performance targets to be **beyond the limits of belief, credibility or allowable culpability**.

I believe the responses made by TVP under FOI Act 2000 warrants further investigation by the Information Commissioner.

3. Evidence based Assessment:

The issue of public confidence lies in whether, or to what extent, has the original operating intention of the Scheme (road safety) been subject to ‘mission creep’ in terms of its undoubted income generating abilities.

Your most recent reply does not rebut TVP’s response, made under FOI Act 2000 in that TVP does not hold any published community based risk assessment for the establishment or removal of speed detection devices. Your reply merely states ‘an awareness’ of an evidence based assessment, placing reliance on a stock answer supplied by TVP, which through its generality and a broadening of the issues is evasive in nature and fails to answer the specific point raised.

The difficulty with the explanation given by TVP is that it requires a massive act of faith. Their explanation is rather akin to being told that “our system of an evidence based assessment relies upon a permanently sealed box, with some unobservable mechanism inside, but trust in us”.

The absence of any **objective criteria** based on the established principles of good risk management serves to frustrate proper scrutiny of the Scheme as set out in my letter dated 2nd May 2013, but more seriously fails to **safeguard against abuse** of the Scheme in terms of its operation.

For instance to what extent are resources of the Scheme being directed towards reducing the high level risks associated with the human and social/economic impact of road collisions as compared to the lower community risk of minor speeding infractions? Evidence shows that in Buckinghamshire 1 in 5 (20%) mobile devices are situated at locations that have no road collisions recorded.

Your placing undue reliance upon TVP’s explanation shows either a high degree of complicity with TVP or a high degree of complacency on your part in terms of promoting the openness, transparency and integrity of the Scheme.

4. Proposed community risk-based policy framework:

The proposed community risk-based policy framework as set out in my letter dated 2nd May 2013, represented an opportunity to improve the Scheme through adopting best practice in terms of managing local community risk and performance management; but also enables open and honest scrutiny of the Scheme through the use of objective criteria and data.

Indeed TVP states within its published Strategic Plan (2011-14) the key tenet that “*managing risk in all aspects of policing is critical to ensuring that the service we deliver to you is of high quality*”.

Your refusal to adopt or pilot any part of the proposed policy framework shows either a lack of understanding of the importance risk management plays in the delivery of policing or a lack of leadership and imagination. In either case you have failed to act to strengthen public protection.

5. Conclusion:

In many respects the issues surrounding this matter serve as a litmus test concerning purpose and benefits of having an elected PCC and your ability as PCC for the Thames Valley to carry public confidence.

In short, the Scheme is found wanting. There is a significant weight and body of evidence to suggest that the Scheme is out of control, does not follow best practice in terms of managing community risk, cannot demonstrate in any transparent or objective way how it is contributing towards improving road safety and there is evidence to suggest abuse.

Despite the incendiary admissions made by TVP, which you confirm, you failed to act at every opportunity presented to you. Failure to properly scrutinise and hold TVP to account, failure to seek to improve service delivery and failure to act in the best interests of the public by promoting openness, transparency and integrity in relation to the Scheme.

You give the impression of someone who is sleep walking in the job, who is in office but not in power, who fails to show a scintilla of natural curiosity or understanding of the issues at hand.

I would go further and suggest that your failure to act apart from your dogged adherence to maintaining the status quo, serves as supporting evidence that your relationship with TVP is too complicit, which in turn calls into question your ability to fairly discharge your duties as PCC.

As a member of the public I have sought to tell truth to power. Perhaps now truth will prevail through the oxygen of publicity and the heat of public opinion.

I now feel I have little option but to refer this matter to the Police and Crime Panel within the next **7 working days**.

Yours sincerely,



Adrian Neighbour



Mr Adrian Neighbour
4 Brook End
Weston Turville
AYLESBURY
Buckinghamshire
HP22 5RF

Paul Hammond CPFA

Chief Executive
Office of the Police & Crime Commissioner
for Thames Valley

Tel: 01865 846771
E Mail: paul.hammond@thamesvalley.pnn.police.uk

Our Ref: PH/PCC Complaints/PCP/ANeighbour
Your Ref:
Date: 20th September 2013

Dear Mr. Neighbour

Re: Complaint against the Police and Crime Commissioner for Thames Valley

First, may I apologise for my failure to deal with your complaint in a timely and efficient manner; this avoidable and unnecessary delay is wholly down to an oversight on my part.

Regarding your complaint against the Police and Crime Commissioner (PCC), dated 15th July 2013, concerning your allegation that he has failed to properly discharge his statutory duties as PCC, I note that you received written responses from Mr Stansfeld and by an officer on behalf of the PCC (Mr Graham Lawson) to your questions concerning his oversight and scrutiny of Thames Valley Police's (TVP) policy over the use of speed cameras and their effectiveness. These responses were dated 8th February 2013 (in respect of your letter dated 26th November 2012) and 25th June (in respect of your letter dated 2nd May 2013).

I also note that you are dissatisfied with the above responses for the reasons you have set out in your correspondence, resulting in your letter of complaint that the PCC has failed in his duty to:

- 1) Hold TVP to account in the exercise of its functions
- 2) Ensure VFM is being achieved on behalf of the taxpayer
- 3) Act as a lightning conductor in respect of local public concerns.

Nevertheless, having reviewed the evidence contained in the correspondence I have decided, on behalf of the Police and Crime Panel, **not** to record your complaint.

My reason for not recording your complaint is that the PCC will inevitably have different priorities, opinions and working methods to many of his constituents, at any point in time, but the fact that they may be different does not in itself represent the basis of a complaint against the 'conduct' of the PCC. The PCC will be held to account for such matters as differences of opinion on priorities, policies and practices, and his overall performance in holding the Chief Constable of TVP to

account for the delivery of an efficient and effective police service, through the electoral ballot box.

Therefore, in accordance with the statutory complaints process and regulations (The Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012), I have decided not to take no action in relation to your complaint and am not recording it. I have taken this decision under Regulation 15 ("Disapplication of requirements of Regulations"), specifically Reg. 15(3)(e), i.e. *"the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints"*.

Please note that there is no right of appeal against the decision of a Police and Crime Panel not to record a complaint.

Yours sincerely,



Paul Hammond

Chief Executive

Office of the Police and Crime Commissioner for Thames Valley
(on behalf of the Police and Crime Panel)

cc Reece Bowman Scrutiny Policy Officer, Thames Valley Police and Crime Panel
 Anthony Stansfeld Police and Crime Commissioner for Thames Valley

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BUCKS
HP22 5RF

Adrian Neighbour. B.Sc(Hons) MBA

E-mail: adrianneighbour@gmail.com

Paul Hammond
Chief Executive Office of PCC
The Farmhouse
Oxford Road
Kidlington
Oxon
OX5 2NX

21st September 2013

Dear Mr Hammond,

COMPLAINT AGAINST PCC FOR THE THAMES VALLEY.

I refer to your letter dated 20th September 2013.

I believe your decision not to refer this matter to Police and Crime Panel to be misguided and as Gatekeeper in this matter your action may well prove not to be in the best interests of the 'Office' of the Police and Crime Commissioner.

Your assertion that my complaint is concerned merely with a difference of opinion, priorities and working methods constitutes a gross misrepresentation of the facts in this matter and belies the importance of the wider public interest issue surrounding the operation of Speed Cameras in the Thames Valley.

The legitimate issue of conduct is real and concerns evidence of the PCC's **wilful** failure to act to properly fulfil his primary duties as PCC, despite a series of damning disclosures of **fact** made by TVP under the Freedom of Information (2000) highlighting the chronic state of overview and scrutiny arrangements.

The absence of any meaningful oversight in relation to aspects of Community Safety (budget totalling £3.5million) calls into question the nature and extent of due diligence conducted by the PCC in relation to the performance of all other aspects of service delivery operated by TVP at a total cost to the tax payer of some £386million p.a; all this against a background of sanctioning a 2% rise in the Council Tax precept.

To therefore suggest my complaint is vexatious, oppressive or an abuse I find as a tax-payer quite insulting.

Rather alarmingly, your letter appears to advocate no change to the current chronic state of oversight and scrutiny arrangements until the next PCC election, which will be some years hence.

In the meantime, I shall in the interest of greater public openness and accountability, not to mention improved road safety, continue to advocate change as previously set out, to a wider and influential audience.

Yours sincerely,



Thames Valley Police & Crime Panel

Chairman: Cllr. Trevor Egleton

Thames Valley Police & Crime Panel Secretariat
Policy, Performance and Communications
Buckinghamshire County Council
G9, New County Offices, Walton Street
Aylesbury, HP20 1UA
(01296) 382548
14/11/13

Dear Mr. Neighbour,

I write with regard to your recent correspondence with David Lidington MP on the subject of the operation of the Thames Valley Road Safety Speed Camera Scheme.

I note that earlier this year you raised a complaint about the Police & Crime Commissioner's (PCC) oversight of this matter, which was not referred to the Police & Crime Panel by the Chief Executive of the Office of the PCC.

I intend to suggest to the Police & Crime Panel that scrutiny of the PCC's intentions around the scheme be considered, at its next meeting on 22nd November, for inclusion in its work programme.

This process will involve the Panel applying its topic selection and referral protocol to consider whether the subject should be included in its work programme, to be scrutinised as action taken by the PCC in connection with the discharge of his functions.

Trevor Egleton
Chairman, Thames Valley Police & Crime Panel