

12th January 2017



Warwickshire Office of the PCC
3 Northgate Street
Warwick
Warwickshire CV34 4SP

The Rt Hon Amber Rudd, MP
Home Secretary
Home Office
2 Marsham Street
LONDON
SW1P 4DF

Philip Secombe, TD
Police and Crime Commissioner

Tel: 01926 412322
E-mail: opcc@warwickshire.gov.uk

Dear Home Secretary

RE: HMIC PEEL INSPECTION - Police Legitimacy 2016: An inspection of Warwickshire Police.

The overall judgement of the inspection is that Warwickshire Police is 'good' in respect of the legitimacy with which it keeps people safe and reduces crime and this is welcomed as it represents an improvement from HMIC's inspection findings of 2015 which required the force to make improvement in this area, which it has now done. This is testimony to the hard work of the Chief Constable, the Executive Team and the wider Force.

Overall no specific recommendations have been made but the report does identify three areas for improvement which I will comment on later in this response.

The report asks three main questions and I will now cover each one in turn.

1. To what extent does the Force treat all of the people it serves with fairness and respect?

To what extent does the Force understand the importance of treating the people it serves with fairness and respect?

The report quite rightly places emphasis on the importance of procedural justice and acknowledges that this is reflected in the Force's vision and values which are understood by the workforce. This understanding has been promoted through a completed series of workshops for all staff, entitled 'Leading Change, Living the Values'.

In addition, a new programme of workshops entitled 'Shaping the Future', which commenced in June 2016, will further reinforce the Force's vision and values with the workforce.

How well does the Force seek feedback and identify those issues that have the greatest impact on people's perceptions of fair and respectful treatment?

Seeking feedback and challenge:

The inspection confirmed that the Force has a structured approach to seeking feedback and challenge from the people it serves.

The Force has a well-established Independent Advisory Group (IAG) network which acts as a link with communities. IAGs operate at both a strategic and an operational level within the Force. Safer Neighbourhood Teams (SNTs) utilise as part of their Key Individual Networks (KIN) locally based networks of volunteers who help to develop better relationships between the Police and local communities.

It was pleasing to read that the Public Scrutiny Meetings, set up by the previous Police and Crime Commissioner (PCC) were acknowledged for the important role they played in obtaining feedback and challenge to the force and PCC from the public.

Identifying and understanding the issue:

The Force's use of complaint data and Victim Satisfaction Surveys' is acknowledged in the report as providing important information which the Force uses to improve its legitimacy with the public.

The Force's non-compliance with three aspects of the Best Use of Stop and Search (BUSS) Scheme has now been addressed. This is an area I have closely scrutinised since coming into office and it is reassuring to note that the Force has now been readmitted to the BUSS Scheme and is fully compliant. Indeed the 'Ride Along Scheme', which was part of the improvements made, is now identified as an area of best practice.

The role of the PCC's Trust, Integrity and Ethics Committee in DIP sampling and quality assuring police complaint investigations is commented upon favourably in the report, as is the work of the Out of Court Scrutiny Body which oversees the decision making panels work in this area.

Body Worn Video (BWV) is referred to and recently I have approved the purchase of BWV for frontline staff which will come online during the Spring of 2017.

How well does the Force act on feedback and learning to improve the way it treats all the people it serves and demonstrates that it is doing so?

Making improvements:

Information is gathered about the reasons for both negative and positive perceptions of police treatment and is a principal element of its performance management at all levels across the Force.

The Victim Satisfaction Improvement Board, with its action plan to increase awareness across the organisation in relation to public perceptions of police treatment, is an example of this. My office is represented on this Board and we are also leading on key pieces of work in relation to improving victim satisfaction levels across the County, on behalf of the Local Criminal Justice Board.

My office is also closely monitoring the outcome from the recently introduced Rape Victim Survey referred to in the report. My office also plays an important role in the Service Improvement Board, which is a relatively new group which has the potential to have a far reaching impact across the organisation, ensuring that lessons learnt are implemented across the Force.

In summary, the Force has been found to treat the people it serves with fairness and respect and as such, has been graded 'good' with no areas for improvement.

2. How well does the Force ensure this its workforce behaves ethically and lawfully?

How well does the Force develop and maintain an ethical culture?

The report highlighted the importance of vetting and the need to establish an ethical working environment or culture. The inspection found that the Force's vetting procedures were clear and understood by those who are part of the process. The Force was found to comply with the National Vetting Policy. The appeals process was found to be operating effectively and applications with 'protected characteristics' were given particular attention and the Force was found to be fully compliant with the Equality Act (2010) in this regard.

Overall, the vetting processes in the Force are operating effectively which I am pleased to observe. The Force complies with its obligations to provide the College of Policing with details of the officers and staff who have been dismissed from the service for inclusion in the current disapproval register.

During the inspection, reassuringly, HMIC found that staff and officers who they spoke to understood the standards expected from them as well as the Code of Ethics. HMIC also found a broad understanding in relation to declaring any business interests, notifiable associations and the recording of gifts and hospitalities.

Steps taken by the Force to reinforce this ethical behaviour included 'Leading Change, Living the Values' workshops for staff, 'The Standard' issued by the Head of Professional Standards and the use of ethical dilemma surveys.

How well does the Force identify, understand and manage risks to the integrity of the organisation?

Identifying and understanding risks to integrity:

Based on previous HMIC recommendations, the Force has introduced an effective process to record, monitor and review registers relating to gifts and hospitality, business interests and notifiable associations. An effective appeals process was evident during the inspection. The Anti-Corruption Unit were found to conduct monthly checks in this area to identify any malpractice and the Joint Audit Committee which includes PCC representation carries out an independent scrutiny of information and examines high risk areas such as expense claims and procurement activity.

The creation of a single Professional Standards Department for the Alliance has improved the governance arrangements for complaints and misconduct, as recommended during a previous inspection. In addition, a previous recommendation for the Force to develop systems to monitor information that staff obtain from Force computer systems has been partially completed.

Planned Force ICT upgrades will provide improvement in this area, but as outlined in the report, other measures have been put in place, which trigger alerts indicating the potential misuse of Force computer systems.

Intervening early to manage risks to integrity:

The work of the Force's monthly People Intelligence Board is highlighted in the report as a means of identifying individuals based on a number of factors who may be susceptible to corrupt practice. Senior representation on the board deliver well considered interventions to address any concerns identified.

Looking for, reporting and assessing intelligence on potential corruption:

The Force was found to assess, develop and respond to corruption-related intelligence in a timely and professional manner.

In addition, the Force offers and promotes several options for the workforce to report wrong doing including an independent integrity line. The inspection found that staff who had made such reports spoke positively about their experience and the support they had been given as part of the process. This was a very positive aspect to the inspection findings in my view.

How well is the Force tackling the problem of officers and staff abusing their authority for sexual gain?

I completely agree that officers and staff abusing their position in this way has a serious impact on the public's confidence in the police service and strongly support the view that this kind of behaviour amounts to serious corruption and should be exposed and dealt with robustly.

Recognising abuse of authority for sexual gain as serious corruption:

Efforts by the Force to eliminate this threat through the early identification of sexual predators and the establishment of preventative measures to prevent this sort of activity were evident during the inspection, which was reassuring. Knowledge of expectations and standards of behaviour were found to be fully understood by officers and staff, which is critical.

Looking for and receiving intelligence on potential abuse of authority for sexual gain:

The inspection confirmed that the Force has measures in place to routinely seek out intelligence relating to potential corrupt practice involving sexual gain, both internally and from external partners. The Force demonstrated that it takes effective action to investigate officers and staff suspected of such activity and manages the risk that they pose.

Taking action to prevent abuse of authority for sexual gain:

The report highlighted a number of initiatives that the Force are undertaking to prevent such abuse e.g. development of a profile, Chief Constable briefings and ongoing training.

Building Public trust:

Working with IAGs to provide external scrutiny helps the Force to manage the consequences of this type of conduct. In addition, proactive use of the media to highlight occasions when officers and staff are sentenced for sexual offences associated with abuse of authority demonstrate the Force's commitments to the public to stamp out this type of behaviour and I very much welcome this.

How well does the Force engage with the public and its workforce about the outcomes of misconduct and corruption cases?

Working with the public:

The Force's website was found to contain the findings from cases that have been concluded, together with the publication of pending misconduct hearings with further details being provided should members of the public wish to attend. The public hearing referred to in this report was attended by the Chief Executive of the Warwickshire Office of the Police and Crime Commissioner, due to the significance of the case that was being heard.

Working with the workforce:

Outcomes of misconduct and corruption cases are broadcast via postmaster (an all staff email) and published in 'The Standard' publication.

Lessons learnt from such cases lead to changes in policy and training, for example to 'use of emergency response belts'.

Overall, the Force was found to be good at ensuring its workforce behaves ethically and lawfully, which I welcome. However, the inspection identified two areas for improvement:

- 1) The Force should ensure that it has the capability and capacity to monitor all its computer systems to identify risks to the Force integrity.

As a response, the Force is upgrading its mainstream computer operating systems (workspace modernisation project) and is in the process of identifying affordable and compatible software which will enable the Force to ensure officers and staff are not accessing sensitive data for improper or unlawful purposes. In addition, whilst it is work in progress, the Force has put in place measures which trigger alerts indicating the potential misuse of Force computer systems.

- 2) Annually, the Force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the Force's integrity.

I note that the Force has not completed such an assessment. However, PSD has completed an in depth analysis of the area's most likely to undermine the integrity and reputation of the organisation. I will be asking the Chief Constable for updates on both of the areas for improvement to ensure that in the coming months, both areas are fully addressed.

3. To what extent does the Force treats its workforce with fairness and respect?

The concept of 'organisational justice' is highlighted in the report and I totally agree with the premise that if the workforce feels it is treated fairly and with respect by its employers then members are more likely to identify with the organisation and treat the public in a similarly fair and respectful way – 'procedural justice'.

How well does the Force identify and act to improve the workforces perceptions of fair and respectful treatment?

The inspection established that the Force uses a range of methods to gather this type of information e.g. Strategic Diversity Board, Staff Surveys and online question and answer forums. With regards to the Staff Survey conducted during 2015, HMIC found demonstrable action had been taken in response to the survey findings which included changes to the performance appraisal process, minimum staffing levels and the establishment of working groups to explore and address issues such as perceptions of discrimination in the workplace.

The number of grievances dealt with by the Force for both officers and staff was lower than the national average but the report reached no conclusion on this particular point. The Chief Constable briefing days were commented upon very favourably and represented a significant

but worthwhile commitment from the Chief Constable and his Deputy. I attended one of their sessions and I found it to be very impressive in terms of the Chief Constables openness and his efforts to engage on a personal level with every attendee.

How well does the Force support the wellbeing of its workforce?

It was reassuring to read in the report that significant improvements have been made in this area and that the HMIC found a clear commitment to health and wellbeing across the force. The work of the Health and Wellbeing Board chaired by the Chief Constable was highlighted for its effectiveness.

Analysis of rest days in lieu (RDIL) and leave days established that the levels in the force were in line with the average for forces in England and Wales.

I note the higher than average sickness both long term and short/medium term amongst PCSOs. I will be seeking an explanation for this from the Chief Constable at one of my weekly holding to account meetings.

How fairly and effectively does the Force manage the individual performance of its officers and staff?

As touched on previously as a consequence of the Staff Survey 2015 the Force has introduced a significant change to the annual 'individual performance assessment' (PDR). This change was introduced to remove unnecessary bureaucracy while ensuring that appropriate checks and balances were in place to ensure that the development of individual staff members was not overlooked.

The inspection identified some uncertainty amongst staff concerning the transition to the new PDR System which has been clarified by the Chief Constable via staff circulars. However, the report has identified this as an area for improvement and, I will monitor very closely the Force's response to this issue.

Once again, in summary the Force was found to be good at treating its workforce with fairness and respect.

Yours faithfully



Philip Secombe TD
Police and Crime Commissioner