PEEL: Police legitimacy (including leadership) 2017

An inspection of Warwickshire Police

Contents

Introduction

As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)[1] assesses the legitimacy and leadership of police forces across England and Wales.

Police legitimacy – a concept that is well established in the UK as 'policing by consent' – is crucial in a democratic society. The police have powers to act in ways that would be considered illegal by any other member of the public (for example, by using force or depriving people of their liberty). Therefore, it is vital that they use these powers fairly, and that they treat people with respect in the course of their duties.

Police legitimacy is also required for the police to be effective and efficient: as well as motivating the public to co-operate with the police and respect the law, it encourages them to become more socially responsible. The more the public supports the police by providing information or by becoming more involved in policing activities (such as via Neighbourhood Watch or other voluntary activity), the greater the reduction in demand on police forces.

To achieve this support – or 'consent' – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain why they are making those decisions), as well as being friendly and approachable.[2] This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have an extremely negative effect on police legitimacy in the eyes of the public.

Police officers and staff are more likely to treat the public with fairness and respect if they feel that they are being treated fairly and respectfully, particularly by their own police force. Therefore, it is important that the decisions made by their force about matters that affect them are perceived to be fair.[3] This principle is described as

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[1] This inspection was carried out before 19 July 2017, when HMIC also took on responsibility for fire & rescue service inspections and was renamed HM Inspectorate of Constabulary and Fire & Rescue Services. The methodology underpinning our inspection findings is unaffected by this change. References to HMICFRS in this report may relate to an event that happened before 19 July 2017 when HMICFRS was HMIC. Citations of documents which HMIC published before 19 July 2017 will still cite HMIC as the publisher.

[2] *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

[3] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf

'organisational justice', and HMICFRS considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

One of the most important areas in which internal organisational justice and external procedural justice principles come together is the way in which police forces ensure that their workforce behaves ethically and lawfully. In HMICFRS' 2017 legitimacy inspection, we continued our assessment of how well forces develop and maintain an ethical culture and we re-examined how forces deal with public complaints against the police. How this is done needs to be seen to be fair and legitimate in the eyes of both the police workforce and the general public.

As part of this year's inspection, we also integrated aspects of leadership into our assessment of legitimacy, as the two areas are closely linked. We assessed the role that leadership plays in shaping force culture, the extent to which leadership teams act as role models, and looked at how the force identifies and selects its leaders.

While our overarching legitimacy principles and core questions remain the same as last year, our areas of specific focus continue to change to ensure we are able to assess a full range of police legitimacy topics, including emerging concerns or Home Office commissions. As such, it is not always possible to provide a direct comparison with last year's grades. Where it is possible to highlight emerging trends in our inspection findings between years, we do so in this report.

A separate report on the force's efficiency inspection findings is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2017/warwickshire/efficiency/). Our reports on police effectiveness will be published in early 2018. Our 2016 reports on forces' effectiveness, efficiency, and legitimacy are available on our website: www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2016/warwickshire/.

More information on how we inspect and grade forces as part of this wide-ranging inspection is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/how-we-inspect/).

Force in numbers

Workforce

Total workforce (full time equivalents) as of 31 March 2017

1,522

Total workforce breakdown (full time equivalents) as of 31 March 2017

officers	staff (including section 38)	PCSOs
835	587	100

Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

5.2%

officers	staff	PCSOs
5.2%	4.8%	8.2%

Percentage of BAME in local population, 2011 Census

7.3%

Gender diversity

Percentage of females in overall workforce 31 March 2017

Warwickshire Police	England and Wales population, 2015 estimate
42%	51%

Percentage of females by role 31 March 2017

Warwickshire Police

officers	staff	PCSOs
30%	58%	56%

Grievances

Number of grievances per 1,000 workforce raised and finalised 10 months to 31 March 2017

	Warwickshire Police	England and Wales force average
Officers	2.4	4.1
PCSOs	11.4	4.4
Staff	5.1	6.2
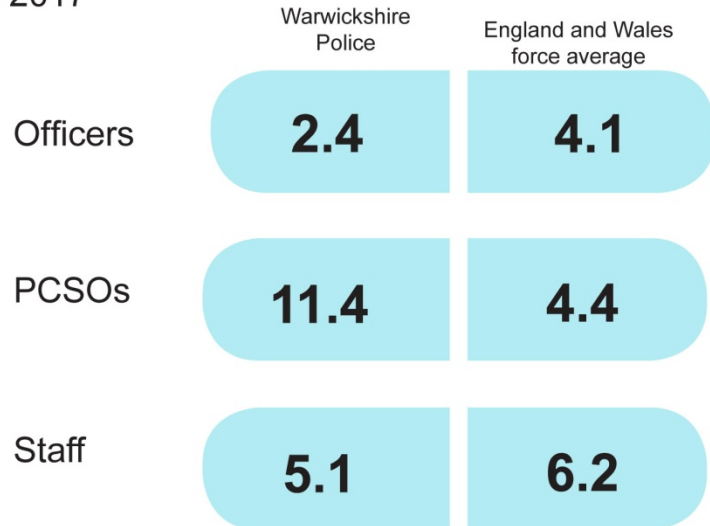
Stop and search

Number of stops and searches carried out in 2015/16 (excluding 'vehicle only' searches)

3,265

Number of stop and searches per 1,000 population in 2015/16

Warwickshire Police	England and Wales force average
5.9	4.8

Note: All figures exclude section 38 staff unless stated otherwise. For further information about the data used, including information about section 38 staff, please see annex A.

Overview – How legitimate is the force at keeping people safe and reducing crime?

Overall judgment[4]

⬤⬤◯◯ **Requires improvement**

Warwickshire Police is judged as requiring improvement in how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we looked at this year, our overall judgment is less positive than last year when we assessed the force as good. The force requires improvement in some aspects of treating all the people it serves with fairness and respect; it requires improvement in ensuring its workforce behaves ethically and lawfully; and it requires improvement in some aspects of treating its workforce with fairness and respect.

Overall summary

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

⬤⬤◯◯
Requires improvement

How well does the force ensure that its workforce behaves ethically and lawfully?

⬤⬤◯◯
Requires improvement

To what extent does the force treat its workforce with fairness and respect?

⬤⬤◯◯
Requires improvement

Warwickshire Police is judged as requiring improvement in respect of how legitimately it keeps people safe and reduces crime. Although leaders clearly demonstrate that they understand and value the benefits of procedural justice, they need to provide the workforce with training so that the force acts fairly, treats people with respect and communicates effectively. The force scrutinises its use of stop and search powers well, but must improve its understanding of how its officers and staff use force. Reassuringly, the force encourages external scrutiny from different groups and acts on their feedback, but it would benefit from involving young people more.

Warwickshire Police takes steps to ensure that its workforce makes decisions that are ethical. Its internal ethics committee is a new development that will provide officers and staff with opportunities to raise ethical questions and allow for learning to

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[4] HMICFRS judgments are outstanding, good, requires improvement and inadequate.

be passed on. The force needs to improve its handling of complaints and misconduct cases, including how it supports and communicates with complainants, witnesses and those subject to investigation. It needs to be consistent in handling cases that involve discrimination and it could do more to promote access to the complaints system for people who need extra assistance.

The force requires improvement in some aspects of treating its workforce with fairness and respect. Although it understands the importance of addressing potential disproportionality in the recruitment, retention and progression of officers and staff with protected characteristics (such as age, gender or sexuality), it does not monitor disproportionality in their treatment if they are subjected to complaint or misconduct investigations. Positively, leaders demonstrate a growing commitment to health and wellbeing, particularly support for mental health, and this is recognised by the workforce. The force is also working to improve how it manages and develops individual performance, but many of its initiatives are recent and their benefits cannot yet be determined. The introduction of continuing professional development provides Warwickshire Police with the ability to identify leadership potential throughout its workforce; its leadership selection process is fair and open, and the workforce perceives it to be fair.

Areas for improvement

- The force should ensure that all relevant officers have received sufficient, suitable training to enable them to use powers of arrest only when necessary.

- The force should improve its process for regularly and frequently scrutinising a broad range of data and information, including from body-worn video, to understand its use of force and improve how its workforce treats people with fairness and respect. It should also evaluate how stop and search activity reflects its priorities, to provide further reassurance to communities that its use of stop and search is fair and effective.

- The force should review the accuracy and timeliness of the information it includes on its website about chief officers' pay, rewards and business interests.

- The force should review how it promotes access to the complaints system, including the support it is able to offer people who may need additional assistance and those in communities that have less trust and confidence in the police. It should also improve how it keeps complainants, witnesses and those subject to allegations updated about the progress of investigations.

- The force should ensure that it has effective systems and processes in place that enable it to understand the underlying causes of threats to its workforce's wellbeing, and take action to mitigate them.

- The force should ensure that its supervisors can recognise warning signs, intervene early and provide support to officers and staff who may be experiencing problems affecting their wellbeing.

- The force should ensure that it has effective systems, processes and guidance to manage individual performance and identify the most talented individuals within its workforce.

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

College of Policing research suggests that, in the eyes of the public, police legitimacy stems primarily from the concept of 'procedural justice': the expectation that officers will treat the public respectfully and make fair decisions (explaining their reasons openly and clearly), while being consistently friendly and approachable.[5]

While HMICFRS recognises that police legitimacy stems from broader experiences of the police than by direct contact alone, our inspection focuses specifically on assessing the extent to which forces make fair decisions and treat people with respect during their interactions with the public. To do this, we looked at how well leaders can demonstrate the importance they place on procedural justice and how well the workforce understands these principles and applies them. Also, we assessed how well the force scrutinises the extent to which procedural justice takes place, particularly with regard to coercive powers, including the use of force and stop and search.

To what extent does the force understand the importance of treating people with fairness and respect?

HMICFRS assessed the extent to which leaders of the force understand the importance of procedural justice, and the arrangements they have made to provide the workforce with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. We examined the workforce's understanding of the principles of procedural justice (being friendly and approachable, treating people with respect, making fair decisions, and taking time to explain these decisions). We did this by checking their understanding of the concept of unconscious bias,[6] their awareness of effective communication skills[7] in all

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[5] *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

[6] Personal biases are influenced by factors including people's background, personal experiences and occupational culture, and they can affect our decision-making. When we make quick decisions, these biases can, without us realising, disadvantage particular groups of people. It is vital that police officers understand their own biases and how to overcome them, to ensure the decisions they make are fair.

[7] Research into the effect of communication skills training in Greater Manchester Police (e.g. showing empathy, building rapport, signposting and using positive and supportive language) showed this improved officer attitudes and behaviours and had a "significant positive effect" on the quality of interactions between police officers and victims. See: http://library.college.police.uk/docs/college-of-policing/Technical-Report.pdf

interactions with the public and their appropriate use of coercive powers (with a specific focus on stop and search and use of force).[8]

Understanding the importance of treating people with fairness and respect

Warwickshire Police has a good understanding of the importance of treating people with fairness and respect, which is consistent with last year's findings. Leaders clearly demonstrate that they understand and value the benefits of procedural justice by making decisions that reflect the importance of fair and respectful treatment and by reinforcing the principles set out in the College of Policing's Code of Ethics.[9] The force's vision is one of 'protecting people from harm', and its values – professionalism, high standards of behaviour and engagement – confirm the importance Warwickshire Police places on treating people properly. All members of its workforce are expected to display these values. The force provides officers and staff with the knowledge, skills and understanding they need to treat the people they serve fairly and with respect.

Understanding of unconscious bias

Not all frontline officers, staff or supervisors have yet received training or guidance on how personal bias can influence their decision making. However, in May 2017 the alliance introduced a training programme, starting with senior leaders and those involved in selection and promotion processes, to help its workforce to identify and overcome unconscious bias. Those who receive existing training on unconscious bias include new recruits, professional standards department (PSD) officers and staff, officers undergoing safety training and police staff from support services, including human resources. The force intends to reinforce the classroom training it provides by using an online training package. During fieldwork, HMICFRS interviewed officers and staff to establish their understanding of unconscious bias. We found there was a good level of understanding, although some interviewees felt that this was based on individual qualities and not just as a result of training or other guidance. Individuals considered how bias would affect their views of people in different situations and gave examples; they described how they had changed their approach to incidents involving persistent missing people, members of the travelling community and domestic abuse victims to ensure that their decisions were fair. This

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[8] *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/; *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force; and *College of Policing and National Police Chiefs' Council, Personal safety manual*, 2016. 2016. Available from: http://library.college.police.uk/docs/college-of-policing/PSM/PSM-MOD-01-INTRODUCTION.pdf

[9] Code of practice setting out the principles and standards of professional behaviour. It applies to all those working in policing in England and Wales; the code was issued by the College of Policing under section 39A of the Police Act 1996 as amended by section 124 of the Anti-social Behaviour, Crime and Policing Act 2014.

suggests that they are becoming more skilled at making decisions and are more likely to treat people fairly and with respect because they have a better understanding of unconscious bias.

Communication skills

The force provides training and guidance to its officers and staff on the importance of effective communication skills, to improve how they interact with the public. Training on the use of stop and search powers emphasises the importance of good communication and the themes of unconscious bias, discrimination and mental health are embedded within annual officer safety training, including for police community safety officers (PCSOs), meaning that students are likely to develop their abilities to interact with the public in a range of situations. Control room staff have received training to enable them to resolve incidents when a member of the public first makes contact with the force. We found evidence of this during our inspection, with officers and staff throughout the alliance explaining how they had applied their skills in difficult circumstances to good effect; examples included the use of effective communication to defuse violent confrontations.

Use of coercive powers

On an annual basis, Warwickshire Police provides training and guidance to all relevant officers and staff in frontline roles in the use of coercive powers. Operational decision making is supported by training in the National Decision Model (NDM)[10] during mandatory officer safety training and is complemented by specific training on stop and search powers, reflecting authorised professional practice.

Although we found that officers and staff spoke positively about the training they are given and generally know how to use coercive powers well, we noted that there were differences in officers' understanding of when an arrest is necessary, meaning they might exercise the power to arrest inappropriately. The alliance needs to take steps to ensure that its frontline officers understand when it is necessary to arrest as thoroughly as they understand other coercive powers.

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[10] Decision-making model developed by the College of Policing which recognises the need for all police decisions to be consistent with the principles and standards of behaviour in the Code of Ethics; used by officers when responding to spontaneous incidents or planned operations.

How well does the force understand the extent to which its workforce treats people with fairness and respect?

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we examined in PEEL 2015: the use of force[11] and stop and search powers. Specifically, we inspected the extent to which forces record data and how well they scrutinise data and other information, including through external scrutiny,[12] to understand and improve the use of these powers. In the case of stop and search, the next section sets out our findings. It includes our assessment of the reasonableness of recorded grounds for stop and search.

Scrutiny of use of force to improve treatment

Warwickshire Police needs to do more to identify trends, and individual and organisational learning in relation to the use of force, in order to improve its policy and practice. In HMICFRS' 2015 inspection of the force,[13] we found that Taser was being used fairly and appropriately and we commented on the arrangements in place to identify problems relating to its use. Although we did not identify any disproportionate use of force in this year's inspection, the processes for reviewing officers' use of force other than that involving Taser are not sufficiently structured or comprehensive. The force does not yet fully comply with the National Police Chiefs' Council (NPCC)[14] minimum requirement for recording the use of force, due to IT problems. The force is working towards rectifying this situation and expects to

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[11] In 2015 HMICFRS found a generally positive picture of force oversight arrangements for use of Taser. However, in 2016, we found that many forces did not have similar levels of oversight for other types of use of force. As a result of a review undertaken by the National Police Chiefs' Council, all forces have been required to collect a minimum data set in respect of use of force since April 2017. The review is available at:
www.npcc.police.uk/documents/uniformed/2016/Use%20of%20Force%20Data%20Report%20to%20Home%20Sec.pdf. Also see *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/

[12] *Independent Advisory Groups: considerations and advice for the police service on the recruitment, role and value of IAGs*, College of Policing, 2015. Available at: www.college.police.uk/What-we-do/Support/Equality/Documents/Independent_advisory_groups_advice_2015.pdf

[13] *PEEL: Police legitimacy 2015 – An inspection of Warwickshire Police*, HMIC, 2016, Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

[14] Organisation which brings together 43 operationally independent and locally accountable chief constables and their chief officer teams (and London equivalents) to co-ordinate national operational policing; it works closely with the College of Policing, which is responsible for developing professional standards, to develop national approaches on issues such as finance, technology and human resources; replaced the Association of Chief Police Officers on 1 April 2015.

comply fully in the near future. Officers and staff do submit records about most types of force used, but analysis of this information is currently insufficient. Warwickshire Police recognises this, and is taking steps to ensure its procedures are more robust by improving its governance arrangements and its analysis of data. A senior police officer has been appointed to lead this work on behalf of the alliance.

Warwickshire Police has recently introduced body-worn video, following a trial period; its investment in this type of equipment is considerable. The force is now in a position to exploit the opportunities video-recording equipment provides, to improve its understanding of how it gathers evidence, supports victims and can improve public perceptions of procedural justice and fair treatment.

External scrutiny to improve treatment

Warwickshire Police makes good use of external scrutiny groups at force and local levels, each with independent chairs and diverse membership. HMICFRS examined how different groups influence the force's decision making. The force's independent advisory group (IAG) network is well established and the force supports the groups by providing members with training and relevant information so they have the knowledge, skills and confidence they need to provide effective challenge and scrutiny. IAG members attend force events; for example, a session highlighting the police use of firearms was provided for independent representatives from across the alliance. There are also groups that examine themes, such as the recent introduction of body-worn video cameras and stop and search activity. Local and thematic IAGs across the alliance are co-ordinated by a strategic IAG that provides members with the opportunity to challenge senior police officers.

IAG membership is renewed regularly and the application process is clear and accessible via the force's website. Membership is diverse, and chairs are independent of the police. Information about IAGs is readily available on the force's website and includes the records of meetings. During our inspection, we were given examples of when IAG members had played important roles in the aftermath of critical incidents by providing feedback about the actions of the police. IAG members indicated that they were confident in challenging the force; however, some felt that the alliance could do more to provide members more quickly with details of the action it takes in response to problems they raise, in particular on their observations on cases of hate crime.

HMICFRS also believes the force could do more to obtain a greater range of views of its activities from communities, including from those who may have less trust and confidence in the police. Young people are not represented at the IAGs, although other forms of engagement do allow their views to be obtained; for example, the force is participating in an equality and inclusion partnership initiative funded by the police and crime commissioner (PCC), enabling young people to highlight policing concerns. Greater engagement with young people will help the force improve how it treats all the people it serves fairly and with respect.

The force also encourages external scrutiny and challenge in other ways. HMICFRS observed how the work of the independent trust, integrity and ethics (TIE) committee which reviews different aspects of policing; examples include the use of stop and search, the handling of public complaints and the use of unmanned aerial vehicles or drones. TIE meetings are open to the public, are supported by an officer of at least the rank of deputy chief constable level and include representatives from the office of the police and crime commissioner (OPCC). Further examples include the professional standards department's (PSD) involvement of members of the TIE committee in the dip-sampling of complaints; the introduction of an independent element to the handling of appeals is intended to improve public confidence in the complaints system.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive available to the police. Their disproportionate use in respect of black, Asian and minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.[15]

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.[16] Our 2015 legitimacy inspection[17] found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.[18] Also, we assessed how the forces scrutinise use of these powers.

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[15] *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

[16] *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available at: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/ and *Best Use of Stop and Search revisits*, HMIC, September 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/best-use-of-stop-and-search-revisits/

[17] *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

[18] See annex A for more information about the methodology for our review of stop and search records.

Understanding of national guidance

Warwickshire Police ensures that all relevant officers receive training on how to use stop and search powers fairly and respectfully. In addition to an online interactive learning method, officers undergo a one-day training package that amalgamates the College of Policing's recommended course content and the force's own learning requirements; it emphasises the importance of behaviour, integrity and the Code of Ethics. During our inspection, we found that officers we spoke to had a thorough understanding of their obligations when conducting stop and search activity; they were able to explain the practical application of the National Decision Model (see above) and authorised professional practice. The force also identifies good practice from other domestic and foreign organisations – for example, 'baseline discrimination' training that originates from the United States – to identify how it can refine and improve the training it provides. However, despite officers' explanations of their understanding, when we reviewed 200 stop and search records, we found that twelve did not record sufficient grounds to search (see reasonable grounds for stop and search section below). The force's investments in training and quality assurance have improved the way its officers are exercising the power to stop and search, but further improvement is necessary.

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16 in the local population of Warwickshire Police, BAME people were 2.2 times more likely to be stopped and searched than white people. Black people were 7.3 times more likely to be stopped and searched than white people – the greatest difference of any ethnic group in the force area in the likelihood of being stopped and searched compared with white people.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)[19] compared with white people, in the local population of Warwickshire Police in the 12 months to 31 March 2016
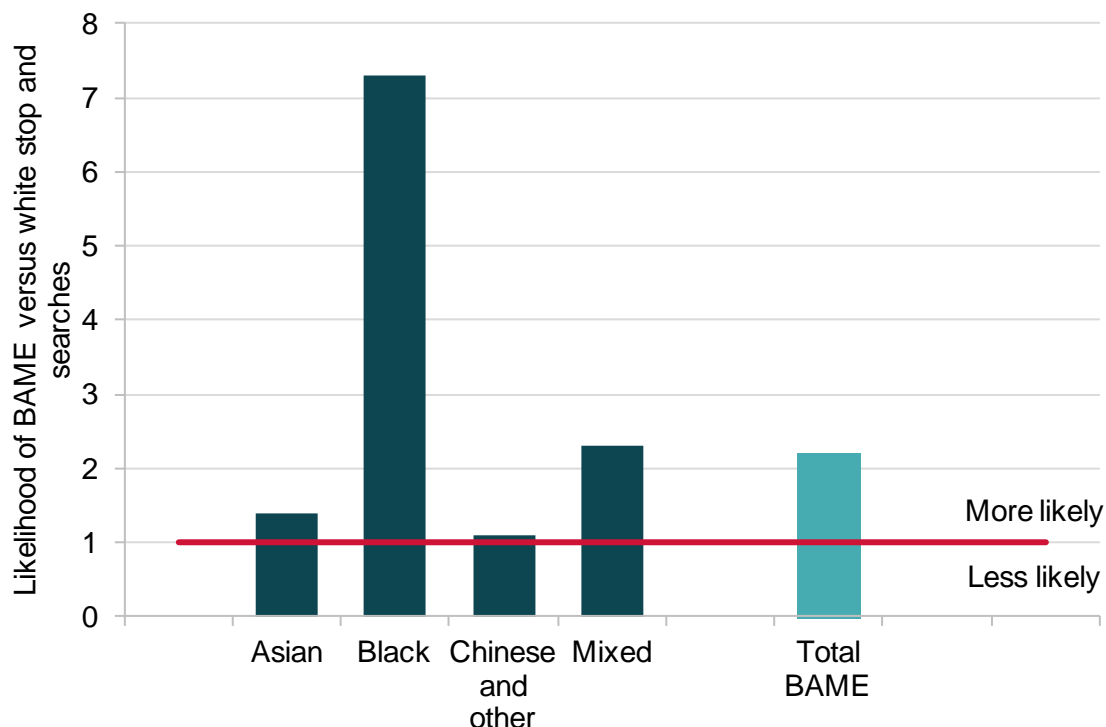
Source: Home Office 2016

Warwickshire Police is good at monitoring the use of stop and search powers to improve treatment. It uses an effective, established process regularly and frequently to scrutinise comprehensive stop and search data, including its application in relation to BAME citizens, the frequency with which the powers are used and what items were found; it actively uses the information it gathers to identify unfairness or good practice, although it does not yet make use of body-worn video footage. Individual records are quality assured centrally after they have first been reviewed by a local supervisor, and prompt feedback is given to officers where a concern has been identified. The alliance has appointed a chief inspector, supported by a sergeant, to oversee its use of stop and search, and regular scrutiny meetings take place at force and local levels using data that include age, ethnicity and outcomes information, to establish how fairly officers are using their powers. Where problems are identified, officers are provided with feedback and mentoring to improve how they interact with the public. This has led to improvements, although our review of records suggests there is more to be done.

We found that local or national priorities do not influence the use of stop and search to the extent we would expect; for example, 129 of the 200 stop and search records we reviewed related to drugs offences. The force's quarterly performance

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[19] Police and Criminal Evidence Act 1984. Available at:
www.legislation.gov.uk/ukpga/1984/60/section/1

assessment report refers to priorities contained in the Police and Crime Plan and areas of risk in the alliance's control strategy; drugs offences do not feature as a high priority in it. The force attributes the number of stop and search records that relate to drugs offences to certain policing operations aimed at tackling drugs supply. However, 108 of the 129 searches for drugs related to possession only, rather than the more serious supplying offences. The force tracks stop and search activity linked to operations and states that any disproportionality in the use of the power is driven by events, not discrimination, but it recognises it needs to do more to improve its understanding. The force has responded well to our 2015 inspection findings; however, it would benefit from reviewing its ability to evaluate how any disproportionality is linked to policing operations and the extent to which its activity reflects its priorities, to provide further reassurance to communities that its use of stop and search is fair and effective.

External scrutiny of stop and search powers to improve treatment

Warwickshire Police makes good use of external scrutiny to improve how fairly it uses stop and search powers. The independent advisory group (IAG) plays a role in scrutinising the use of stop and search, and its independent chair and diverse membership, who are confident in challenging the force to ensure scrutiny, are valuable. HMICFRS observed suitable training being provided to IAG members about the reasonableness of grounds to stop and search. We also reviewed the nature of the information and data the force provides to the IAGs in advance of meetings; these include appropriate extracts from search records and data on age, ethnicity and outcomes at a local level. IAGs determine what is to be discussed at each meeting, including themes and local policing problems, and the force provides relevant information in advance. The IAG members we spoke to were satisfied with the information the force provides, although they told us they were not always updated about the action the force had taken in response to feedback. HMICFRS noted that senior officers provided support to the IAGs. Young people are not represented on the IAG: the force recognises this and told us it intends to develop a young persons' scrutiny panel for stop and search. The alliance-wide trust, integrity and ethics (TIE) committee has recently validated the force's approach to stop and search by evaluating and reporting on its use of the power.

The force also offers a 'ride along' scheme that allows members of the public to accompany officers on duty; this may result in the observation of a stop and search encounter. HMICFRS confirmed that people want to participate in the scheme, but the length of time taken to process applications means long delays can occur between the submission of an application and an individual taking part. The force has responded to feedback from its IAGs and changed its administration process, so that it does not deter the public from using the scheme.

HMICFRS also observed how the alliance now surveys people who have been stopped and searched by the police, to learn about their experiences.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984[20] requires that, to stop and search a person, the grounds to suspect that person of being in possession of a stolen or prohibited article must be reasonable and the grounds must be recorded on the stop and search record.

In our 2013 inspection into the police use of stop and search powers,[21] we were concerned to see that, of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For Warwickshire Police, the 2013 inspection showed that 47 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,[22] we carried out a further review of the recorded grounds in a sample of stop and search records of Warwickshire Police. In that inspection, our review of 100 records found that 29 did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records; 12 did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records completed by the force, our findings indicate that, in general, officers understand not only what makes grounds reasonable but also how to record them properly. It is important to note that a lack of reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist in reality at the time of the stop and search.

In 71 of the 200 records we reviewed, the item searched for was found. This is an important measure: confirming or allaying an officer's suspicions is the primary purpose of the powers. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

Table 1: Results of HMICFRS stop and search records review 2013-17

	2013	**2015**	**2017**
Records not containing reasonable grounds	47 of 200	29 of 100	12 of 200
Item searched for found	–	–	71 of 200

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[20] Police and Criminal Evidence Act 1984. Available from: www.legislation.gov.uk/ukpga/1984/60/contents

[21] *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/

[22] *PEEL: Police legitimacy 2015*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

Summary of findings

Requires improvement

Warwickshire Police requires improvement in some aspects of treating the people it serves with fairness and respect. Positively, its leaders demonstrate that they understand and value the benefits of procedural justice, and the force supports its frontline officers and staff by providing training that helps to ensure they act fairly, treat people with respect and can communicate effectively. The force has reviewed its arrangements to scrutinise its use of stop and search powers and made considerable improvements in this area of policing; however, it still needs to do more. It lacks understanding of its use of force, and needs to remedy this by improving its analysis and scrutiny of data and other information, for example footage from body-worn video.

The force encourages external scrutiny; it has good structures in place and senior leaders provide support to different groups and act on their feedback. The force would benefit from involving young people more to gain a better understanding of what affects the public's perception of fair and respectful treatment, particularly among those groups who may have less trust and confidence in the police.

Areas for improvement

- The force should ensure that all relevant officers have received sufficient, suitable training to enable them to use powers of arrest only when necessary.

- The force should improve its process for regularly and frequently scrutinising a broad range of data and information, including from body-worn video, to understand its use of force and improve how its workforce treats people with fairness and respect. It should also evaluate how stop and search activity reflects its priorities, to provide further reassurance to communities that its use of stop and search is fair and effective.

How well does the force ensure that its workforce behaves ethically and lawfully?

In HMICFRS' 2017 legitimacy inspection, we continued to focus on the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour among their workforces. We also returned to look at how well forces are handling complaints and misconduct cases,[23] as opposed to last year's focus on how well forces are guarding against corruption. [24]

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

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.[25] Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.[26] Officers and staff should feel confident that they can apply these principles to their decision-making. This year, we focused on the way that the leaders of forces demonstrate ethical behaviour and the way that forces approach ethical decision-making across the entire workforce. In addition, where forces had failed to comply with all aspects of the national vetting standards in 2016, we assessed whether their plans are credible and are likely to be compliant by December 2018.[27]

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[23] *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

[24] We did, however, undertake a review of forces' plans in response to our PEEL legitimacy 2016 national report recommendation. The report of our findings is available here: www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/

[25] *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
The role of leadership in promoting ethical police behaviour, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf

[26] Code *of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

[27] HMICFRS' recommendation in December 2016 was that (i) Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so and (ii) Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The ACPO/ACPOS National Vetting Policy was

Leaders as ethical role models

The force's leaders consider the ethical implications of their decisions, but these tend to be raised by an external group, and the introduction of an internal referral system is a recent development for the force. The external trust, integrity and ethics (TIE) committee allows ethical questions to be raised independently and addressed. A useful example relates to the disposal of valuable property coming into police possession, and whether or not the force could contribute the proceeds to charitable causes. The introduction of an internal ethics committee provides opportunities for officers and staff to raise ethical questions in a way that is not punitive and for the force to pass on learning systematically and openly. Although the officers and staff we spoke to were aware of the ethical dilemmas circulated by the professional standards department (PSD), we did not identify examples being raised by them.

The force's leaders act as role models and uphold the values the force expects of them. The chief officer team reinforces the importance of values at leadership events and during day-to-day encounters with officers and staff. Leaders are open to challenge, and ethical decision making forms part of the alliance's promotion processes. Details of chief officers' gifts and hospitality are published openly on the force's website but information on pay and rewards is extremely difficult to find and, once found, is difficult to decipher. There is no information about their pay and rewards, and HMICFRS noted that details of business interests had not been updated since October 2016. The force should review the accuracy and timeliness of the information it includes on its website, so the public can have confidence in the force's integrity.

Ethical decision making

Warwickshire Police has accessible policies and procedures that comply with its equality duty and reflect the Code of Ethics. The force uses the TIE committee, the strategic IAG and internal groups, including staff associations, to provide validation and quality assurance. For example, HMICFRS observed how the officers responsible for overseeing the introduction of body-worn video were questioned about policy at a TIE committee meeting.

The force provides training on ethical decision making, which is understood by the workforce and updated through the circulation of advice and surveys. HMICFRS observed that the force circulates a newsletter to its officers and staff – The Standard – which highlights ethical questions for discussion among teams to promote learning. It also uses online surveys to present the workforce with different ethical dilemmas and ask what action they would take; anonymous results are provided to the PSD, which circulates advice about the correct course of action. Officers and staff were able to recall this well; they described dilemmas relating to the use of mobile phones

and steroids in the workplace. We also saw how other forms of reinforcement are used to ensure that the workforce make ethical decisions: the Code of Ethics is printed inside officers' notebooks, posters are on display in police buildings and the outcomes of misconduct hearings are circulated to the workforce. These methods of reinforcement provide greater assurance that the workforce will make decisions that are ethical.

How accessible is the complaints system to all members of the public?

An accessible complaints system is crucial to building public confidence in the police and to a force's ability to improve the extent to which its workforce acts ethically and lawfully. As such, we assessed how easy it is for the public to make a complaint – including how well forces support those people that may require additional help to gain access to the complaints process.[28] Also, we used a review of case files to assess the level of information provided to complainants and looked at how well forces keep complainants updated about the progress of their complaints.

Ease of making a complaint

Warwickshire Police provides clear, useful information to the public about how to make a complaint, but it could do more to support people who may need extra help in accessing the complaints system. The force provides information on its website about the complaints process and the role of the professional standards department (PSD), in the form of frequently asked questions, but there is no information available for people who require additional assistance, for example access to a translator, a mediator or hearing, speech and eyesight assistance. Complaints data are not published on the force's website. A link to the website's complaints section, that includes forms enabling complaints to be submitted online, is available on the home page of the force's website.

Complaints can also be submitted by email, phone, letter and in person at a police station. HMICFRS found that front-counter staff are aware of their responsibility to support complainants, and we found posters and leaflets highlighting how to make a complaint displayed prominently in public areas. Access to a language line is also provided, and front-counter staff recognise the sensitivity of some complaints and will offer facilities to allow details to be recorded in private. As part of this inspection,

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[28] These could include people with learning difficulties, mental health issues, young people or people whose first language is not English. *IPCC Statutory Guidance to the police service on the handling of complaints,* IPCC, May 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/2015_statutory_guidance_english.pdf and *Access to the police complaints system*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf

HMICFRS carried out a review of 25 public complaints and found one case where a complainant needed additional support, which was provided. However, Warwickshire Police could do more to support complainants. It has worked with the strategic independent advisory group (IAG) to make changes to the information it provides on its website, but it is HMICFRS' view that making a complaint to the force is not easy for people who may need additional assistance. The difficulties could deter some people from making complaints. We did not find evidence of the force targeting communications about complaints at communities that may have less trust and confidence in the police and may be less likely to complain, although it is doing this in relation to hate crime.

Keeping complainants updated

As part of this inspection, we conducted a review of public complaint and internal misconduct case files from Warwickshire Police. We examined 25 complaint files and found that in all 25 cases the force had complied with its legal requirements. Once a public complaint investigation has started, forces have a statutory duty to keep complainants informed of progress. The first update should be provided promptly and within 28 calendar days of the start of the investigation. Subsequent updates must be provided at least every 28 days. Updates should contain enough information to make them meaningful, including, for example, information about the stage reached in the investigation, what has been done, what remains to be done and, where applicable, a summary of any significant evidence obtained. Updates should also include the likely timescale for completing the investigation and any revisions to this. Although this legal requirement only applies to public complaints, HMICFRS expects a similar level of service to be provided to those subject to the complaint and those subject to misconduct allegations.

During our case file reviews, we assessed whether forces had provided timely and meaningful updates. We were disappointed to find that only 14 of the 25 complaint cases recorded regular updates to complainants. We found that eight of the 11 misconduct cases recorded regular updates to witnesses and those who were subject to allegations. When public complaints are finalised, the force is required to provide the complainant with the findings of the report, its own determinations and information on the complainant's right of appeal. We were pleased to find that all 25 complaint files contained evidence that these legal requirements had been met.

How well does the force identify and investigate potential discrimination by officers and staff?

For the public to have confidence in the police and the police complaints system, it is vital that allegations of discrimination arising from police complaints, conduct matters, and death and serious injury investigations are handled fairly and appropriately. We reviewed complaint, misconduct and grievance files to assess the extent to which forces identify and respond to discrimination appropriately and at the earliest opportunity (including referrals to the IPCC), and the extent to which these allegations are investigated in accordance with the IPCC guidelines for handling allegations of discrimination.[29]

Identifying and responding to potential discrimination

Warwickshire Police's workforce have a good understanding of what discrimination is and the harmful effects it has. The force routinely identifies and responds to initial reports of discrimination well and at the earliest opportunity, although it must make more of an effort to identify and refer serious cases to the IPCC when required. Senior leaders promote the importance of diversity and inclusion, and recognise that an understanding of discrimination is important at all levels of the force, rather than being aimed only at new recruits. We spoke to IAG members who have participated in equality and diversity training events for officers and staff; they value the opportunity to be involved in this work. The force has a diversity and inclusion group that includes staff support networks, associations and service leads. It examines factors relating to discrimination by routinely scrutinising data, with the assistance of the strategic IAG.

It is important that police forces can demonstrate that they provide a good service to all the people they serve, including those with protected characteristics (such as age, gender or sexuality). Some people with protected characteristics may be reluctant to complain about the poor service they receive, and it is important that police forces identify and respond to potential discrimination in an appropriate way. HMICFRS examined ten complaints that had been identified by the force as containing an allegation of discrimination. We also examined 15 other complaints that we considered might contain unidentified allegations of discrimination. We were pleased to find there were no additional cases that the force had failed to identify.

We examined one internal misconduct case that had been identified by the force as containing an allegation of discrimination. We also examined ten internal misconduct

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[29] See annex A for more information about our case file review. *IPCC guidelines for handling allegations of discrimination*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/Guidelines_for_handling_allegations_of_discrimination.pdf

cases that we considered might contain unidentified allegations of discrimination. We were again pleased to find that there were no additional cases that the force had failed to identify.

The Police (Complaints and Misconduct) Regulations 2012 require forces to refer a matter to the IPCC if it includes an allegation of criminal behaviour or behaviour which is likely to lead to misconduct proceedings, and is aggravated because it is alleged that discrimination on the grounds of a person's race, sex, religion or other protected characteristic was a reason for this behaviour. We examined the cases alleging discrimination to see whether the force had complied with this requirement. We found that two complaint cases the force had identified as containing an allegation of discrimination met the IPCC referral criteria, but that only one of these cases had been referred to the IPCC. We found that none of the internal misconduct cases the force had identified as containing an allegation of discrimination met the IPCC referral criteria.

Investigating allegations of discrimination

Warwickshire Police has taken action to ensure that its investigators possess the understanding they need to investigate allegations of discrimination well, but there is still room for improvement. HMICFRS noted that the force had sought the assistance of the IPCC to help professional standards department (PSD) investigators understand their responsibilities. Those who investigate allegations of discrimination have a good understanding of equality and diversity and apply the IPCC's guidelines for handling allegations of discrimination routinely. PSD staff are provided with periodic refresher training on the IPCC's guidance for handling cases involving discrimination, and all allegations of discrimination are investigated by the PSD to help ensure that good standards of investigation are maintained. Local supervisors are also instructed that, should they identify discriminatory behaviour, they must refer the complaint to the PSD for further assessment.

We examined ten public complaint cases that the force had recorded as containing an allegation of discrimination. We considered whether these allegations had been investigated satisfactorily, in accordance with the IPCC guidelines for handling allegations of discrimination. We found that all but one of these cases had been investigated satisfactorily; the one case was unsatisfactory because evidence had not been evaluated correctly.

Summary of findings

● ● ○ ○ **Requires improvement**

Warwickshire Police's leaders consider the ethical implications of their decisions and role model the force's values. The force's trust, integrity and ethics (TIE) committee considers ethical matters and reviews policies and procedures in line with the Code of Ethics, and the workforce understand how to consider the ethical implications of their decisions. The force promotes access to the complaints system, but it needs to do more to update complainants, witnesses and those subject to allegations in a timely way, to support complainants who may need extra assistance and to target communications at communities that trust the police less. Warwickshire Police acts to ensure that those who identify, respond to and investigate discrimination understand their responsibilities, but it needs to improve its referral of matters to the IPCC and its standards of investigation into allegations of discrimination.

Areas for improvement

- The force should review the accuracy and timeliness of the information it includes on its website about chief officers' pay, rewards and business interests.

- The force should review how it promotes access to the complaints system, including the support it is able to offer people who may need additional assistance and those in communities that have less trust and confidence in the police. It should also improve how it keeps complainants, witnesses and those subject to allegations updated about the progress of investigations.

To what extent does the force treat its workforce with fairness and respect?

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and types of behaviour.[30] As such, this concept of 'organisational justice', and its potential effect on 'procedural justice' forms an important part of HMICFRS' assessment of police legitimacy and leadership. As no comparative data exist on how fairly officers and staff perceive forces have treated them, we continue to focus our assessment on how well forces identify individual and organisational concerns within their workforces and act on these findings.

In our 2017 inspection, we focused specifically on how well forces identify and act to improve fairness at work, including what action they are taking to make their workforces more representative of the communities they serve. We continued to look at how well forces provide for the wellbeing of their workforces, particularly through preventative and early action, and at the way individual performance is managed and developed.

How well does the force identify and act to improve fairness at work?

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.[31] HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances[32] – to identify, understand, prioritise and resolve their workforces'

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[30] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf and *Organisational justice: Implications for police and emergency service leadership*, Herrington, C. and Roberts, K. AIPM Research Focus, Issue 2, 2013. Available at: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

[31] *Ibid.*

[32] Grievances are concerns, problems or complaints that a member of staff raises formally with an employer, so data on numbers and types of grievances can provide forces with useful information about matters of concern to their workforces.

concerns. Part of our assessment involved reviewing a small number of grievance cases to assess if these adhere to Acas guidance and the Code of Practice.[33]

Unfairness, or perceived unfairness in recruitment processes, opportunities and limited career progression can lead to good officers and staff leaving the service prematurely and fewer women and people from black, Asian and minority ethnic (BAME) communities wanting to join the police in the first place. As such, we re-examined how well forces address disproportional workforce representation in a variety of areas – including recruitment, retention and progression for those people with protected characteristics.[34] We looked at the treatment of BAME officers and staff subject to allegations of misconduct – to improve fairness at work and to make forces more representative of the communities they serve.[35]

Leaders seeking feedback and challenge from the workforce

Warwickshire Police actively seeks to identify and act on the matters that affect the wellbeing of its workforce. The force uses a set of systems and processes that ensure that leaders encourage feedback from the workforce; they include an annual staff survey and an online blog, providing opportunities for questions to be raised with senior leaders, whose responses can be viewed by the workforce. Web chats are held each month and include a variety of themes relating to wellbeing, and the results of live question and answer sessions are published internally. Examples of topics raised by the workforce include the force's policy on smoking and the employee assistance programme. The workforce and staff associations told HMICFRS that they have confidence in, and use, these systems.

The chief officer team is viewed as approachable by officers and staff. Formal and informal communication takes place. For example, the alliance's strategic service improvement department organises internal events, complemented by learning and development sessions and the chief constable's forums and road shows, allowing officers and staff to interact with senior leaders. Chief officers also make use of systems that enable staff to provide anonymous feedback using an online voting system. Votes are collated and the force publishes the results as a series of

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[33] *Code of Practice on Disciplinary and Grievance Procedures.* Acas 2015. Available from www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf. Also *Discipline and grievances at work: The Acas guide,* Acas, August 2017. Available from: www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf

[34] The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from: www.legislation.gov.uk/ukpga/2010/15/section/4

[35] We last examined these issues as part of our 2015 PEEL legitimacy inspection. See *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

frequently asked questions on its intranet site. Chief officers also make use of blogs and web chats. The use of different systems to obtain feedback from the workforce means that leaders are more likely to identify and resolve problems that would otherwise influence the workforce's perceptions of fair decision making and respectful treatment.

Identifying and resolving workforce concerns

Warwickshire Police uses feedback from its workforce to take effective and timely action in response to concerns and it involves the workforce in decision making. It communicates openly on progress and outcomes, and the workforce generally values these arrangements and perceives them to be fair.

The force enjoys a positive relationship with the staff associations. Formal meetings between the associations and chief officers take place every quarter and are chaired alternately by a chief constable and a deputy chief constable. HMICFRS noted that local commanders also circulate bulletins to officers and staff, highlighting good work and promoting opportunities to meet with command team members and give feedback. Staff were able to describe examples of changes that have taken place as a result of feedback, including alterations to on-call and contract arrangements, the use of external recruitment and improvements to the working environment of the control room. This means the force is working in collaboration with its officers and staff to make Warwickshire Police a better organisation to work for.

Data on the numbers and types of concerns, problems or complaints (collectively known as grievances) that have been raised by officers or staff can provide forces with useful information about matters of concern to their workforces.

All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 2 below shows that Warwickshire Police had 4.0 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

Figure 3 shows that the number of grievances raised by officers in Warwickshire Police was 2.4 grievances per 1,000 officers, while the England and Wales average was 4.1 grievances per 1,000 officers. In the same period, PCSOs raised 11.4 grievances per 1,000 PCSOs, while the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 5.1 grievances per 1,000 staff in the same period, while the England and Wales average was 6.2 grievances per 1,000 staff.

Figure 2: Grievances raised per 1,000 workforce, in Warwickshire Police in the ten months from 1 April 2016 to 31 January 2017
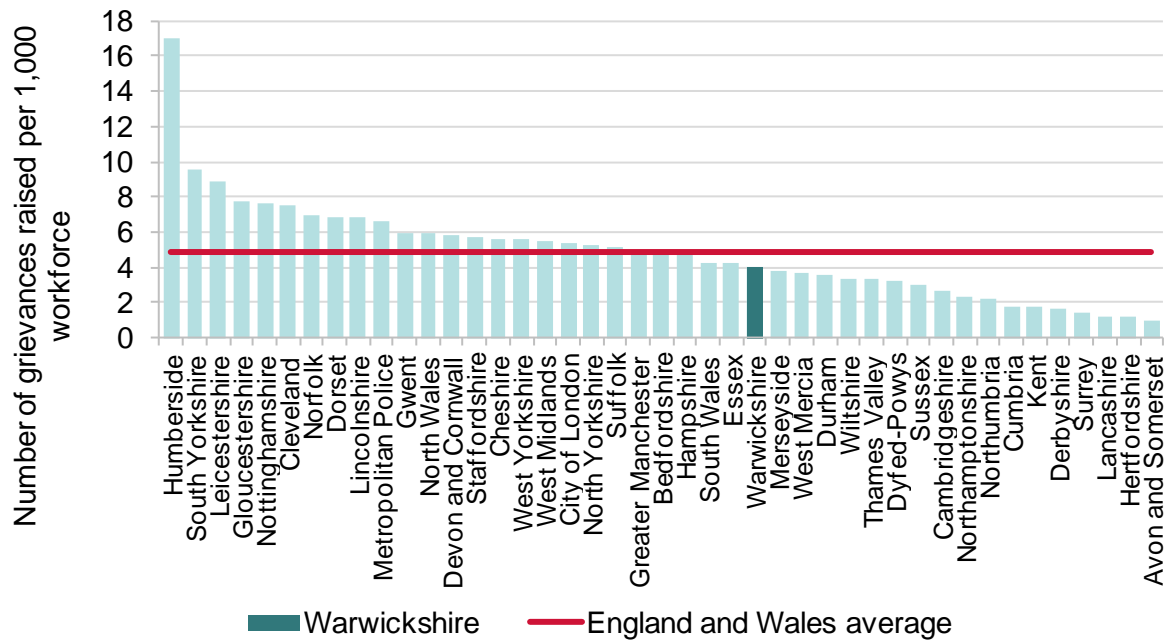
Source: HMICFRS Legitimacy data collection

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff) in Warwickshire Police in the ten months from 1 April 2016 to 31 January 2017
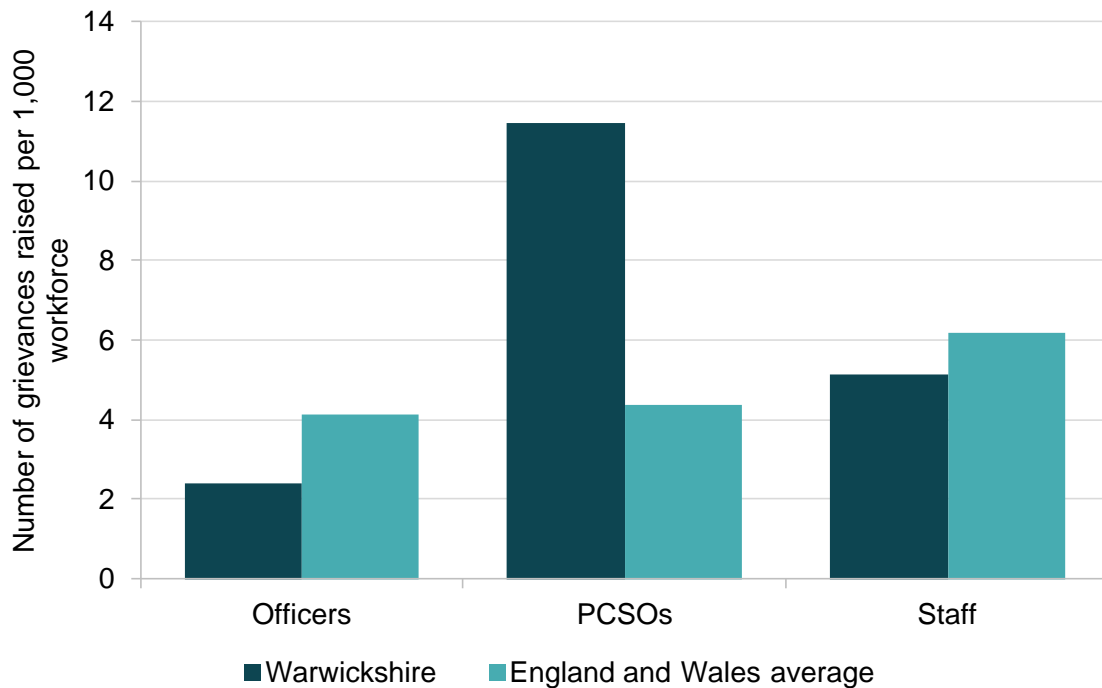
Source: HMICFRS Legitimacy data collection

The force monitors formal grievances and all grievances are channelled through an experienced human resources manager, who provides quality assurance and advice throughout the investigation and resolution process. HMICFRS reviewed ten

grievance files, considering the arrangements the force had put in place to support all the people involved, including any witnesses, and whether the force had properly identified, investigated and resolved the grievance in line with the Advisory, Conciliation and Arbitration Service (Acas) Code of Practice and Guidance. We were pleased to find that in all grievance cases there was a record of appropriate arrangements having been put in place to support the employee or witnesses throughout the process. The force properly identified, investigated and resolved the grievance in all ten cases.

Creating a more representative workforce

To assess how well the force reflects the local population, we considered data on the number of women and people from BAME communities recruited to the force, the number at senior officer level and the number who have served for over 20 years. We used these data to compare the make-up of the force with the make-up of the community it serves.

In the geographical areas served by Warwickshire Police, the 2011 census indicates that BAME people made up 7.3 percent of the local population. In 2016/17, in Warwickshire Police, 5.2 percent of officers were BAME (see figure 4). In relation to officers, 10.9 percent of those joining the force, 4.5 percent of those in senior ranks and 5.0 percent of those who had served over 20 years were BAME.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are BAME, in Warwickshire Police in 2016/17, compared with the percentage of BAME people in the local population
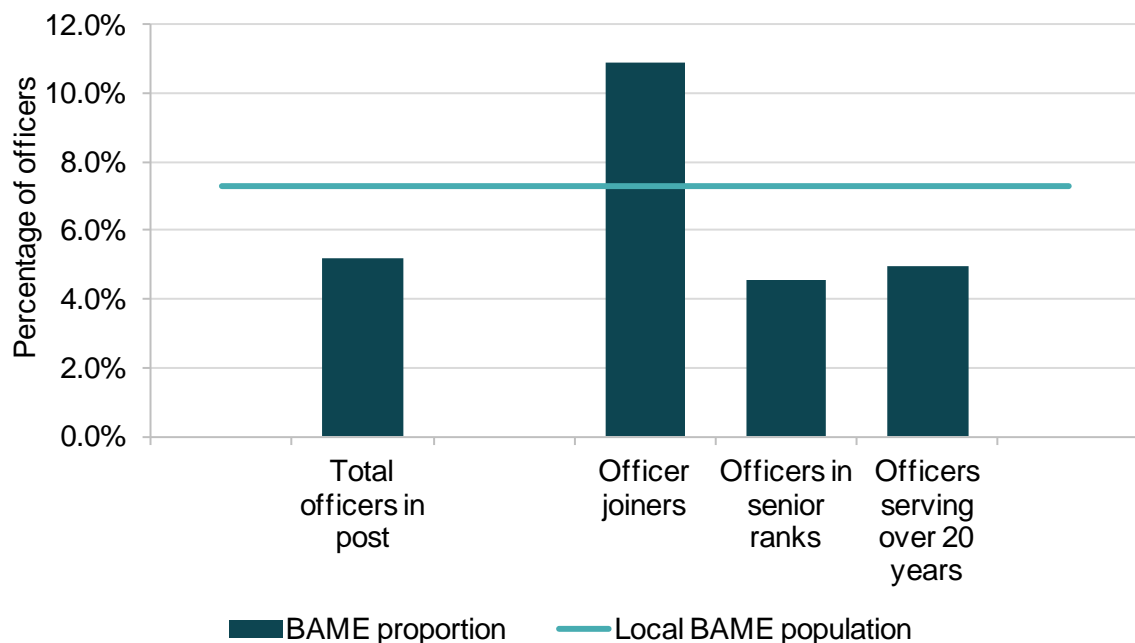
Source: Home Office Annual Data Requirement
Note: High percentages may be due to low overall numbers. The figure above represents officers where an ethnicity was stated.

Figure 5: Comparison of officer leaving rates between white and BAME officers (per 1,000 white or BAME officers) in Warwickshire Police from 2007/08 to 2016/17
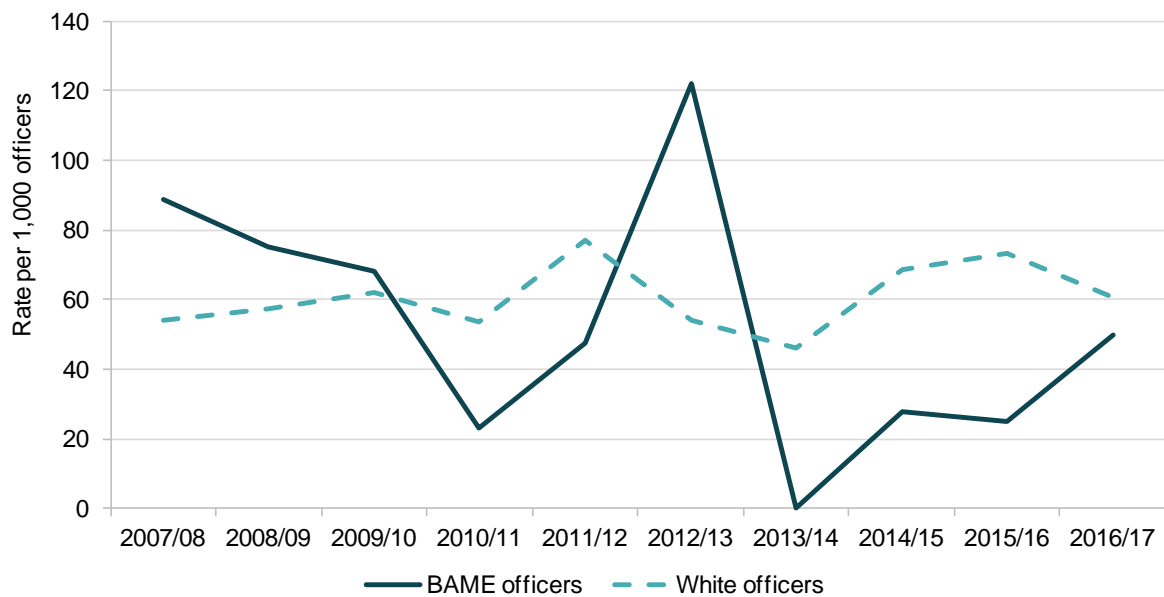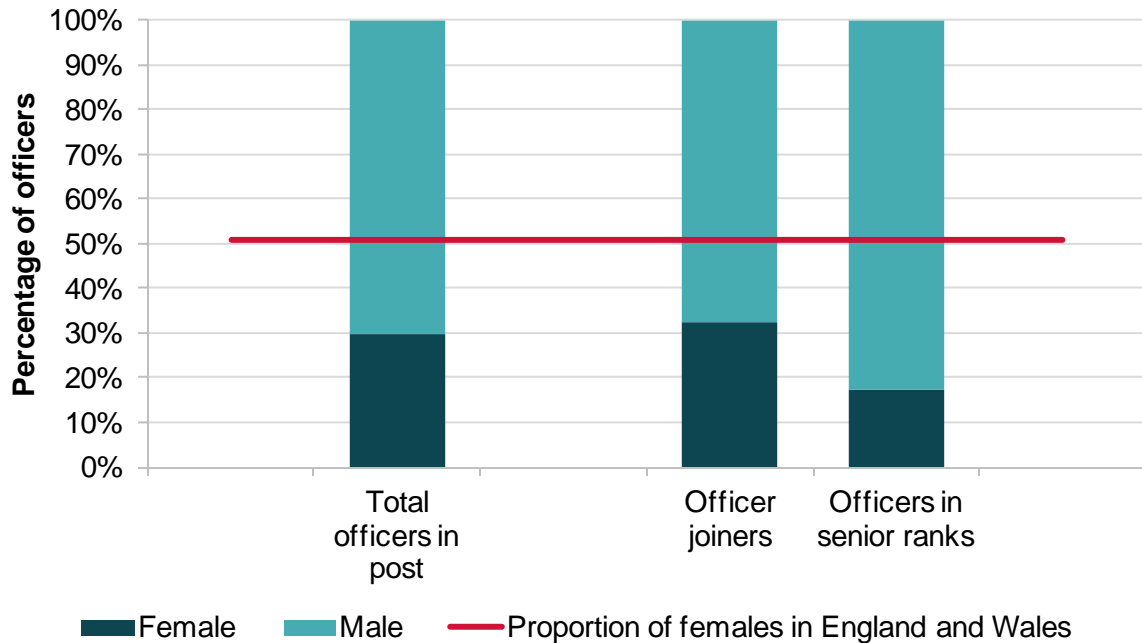

Source: Home Office Annual Data Requirement

In 2016/17 in Warwickshire Police, for the equivalent of every 1,000 BAME officers, 50 left the force (see figure 5), while for every 1,000 white officers 60 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

The proportion of female officers (30 percent) is lower than the proportion of females in the general population, at 51 percent. In the 12 months to 31 March 2017 in Warwickshire Police, 33 percent of those joining the force and 17 percent of those in senior ranks were female (see figure 6).

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Warwickshire Police in 2016/17 compared with the percentage of women in the England and Wales population

Source: Home Office Annual Data Requirement

Figure 8: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Warwickshire Police from 2007/08 to 2016/17
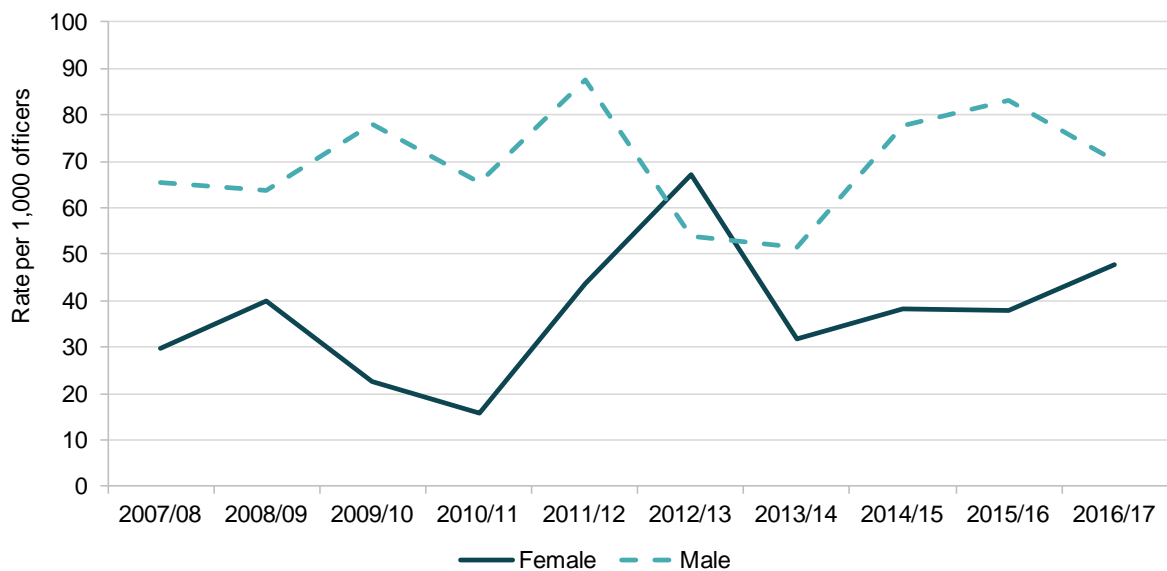
Source: Home Office Annual Data Requirement

In 2016/17 in Warwickshire Police 48 female officers per 1,000 officers left the force, compared with 70 male officers per 1,000 officers.

Warwickshire Police understands the importance of addressing potential disproportionality in the recruitment, retention and progression of officers and staff with protected characteristics. In 2007, 4 percent of the workforce was BAME. In the 12 months leading up to 31 March 2017, 5.2 percent of Warwickshire Police's workforce was BAME, suggesting the force has made progress. Senior leaders acknowledge that the workforce's composition does not yet reflect that of the local population, because BAME citizens are under-represented within the workforce.

HMICFRS observed the force reviewing the composition of its workforce, including gender, at the workforce management group meeting that is led by a chief officer and attended by representatives from across the alliance. The alliance also operates a diversity group that examines recruitment and demographic data. The alliance indicates that 31.17 percent of its workforce are women and it monitors this level against the level set by the British Association of Women in Policing figure of 35 percent.

There are no BAME chief officers serving with either alliance force. However, the alliance has taken steps to increase the diversity of its pool of senior leaders by seeking applications from external candidates during its most recent chief superintendent promotion process. A network exists to provide support for BAME officers and staff; it also promotes recruitment and monitors the career progression of its members. Development opportunities are provided to help retain and develop BAME officers and staff and prepare them for promotion, although this tends to rely on an individual making a request, rather than on the force acting proactively. Positively, the force has increased the diversity of its Special Constabulary; 9.26 percent of special constables are BAME.

The force does not have processes to identify potential disproportionality in the treatment of officers and staff with protected characteristics who are subjected to complaint and misconduct investigations; it is reliant on feedback from support networks and staff associations. We did not find evidence of cases being monitored in an active way to determine whether they were being handled consistently.

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

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do.[36] HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

Warwickshire Police is good at prioritising the wellbeing of its workforce. The alliance launched its joint health and wellbeing initiative in 2016. Progress is monitored at force level by the health and wellbeing board and workforce management group, both led by chief officers, and we found that senior leaders treat mental health as a priority. The officers and staff we spoke to told us that senior leaders prioritise their wellbeing and they perceive this commitment as being genuine.

Identifying and understanding workforce wellbeing needs

The force has an adequate understanding of the risks and threats to the wellbeing of its workforce and takes action to address them, but it needs to do more to establish their underlying causes. The officers and staff we interviewed confirmed that the force has significantly increased its welfare provision and they feel more valued. However, middle managers expressed concerns about their ability to maintain an appropriate work/life balance, particularly given the introduction of mobile data which they feel has increased the expectation that they must be available outside working hours when not on call. We also found that the pressures of demand among response teams and detectives were a theme of the inspection. This is because the scale and complexity of crime is not being considered sufficiently well when workloads are assessed, causing pressure for officers and staff affected by change, and because some response officers do not possess the skills they need to carry out complex investigations.

Analysis of sickness data can give an indication of whether there are problems relating to wellbeing within a police force. It provides a useful point of comparison

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[36] *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/ Also see https://fitforwork.org/employer/benefits-of-a-healthy-workforce/

between forces. Forces can also use sickness data to help them understand the nature and causes of sickness across the organisation to help them prevent sickness and manage it when it occurs.

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short/medium-term sickness absence. On 31 March 2017 in Warwickshire Police, 2.8 percent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 percent. The latest year for which data are available is 2017, which saw an increase of 0.2 percentage points from the previous year, which is in line with changes over the last ten-year period (see figure 8).

Figure 8: Percentage of officers on short or medium-term sick leave in Warwickshire Police compared with the England and Wales average, on 31 March from 2008 to 2017
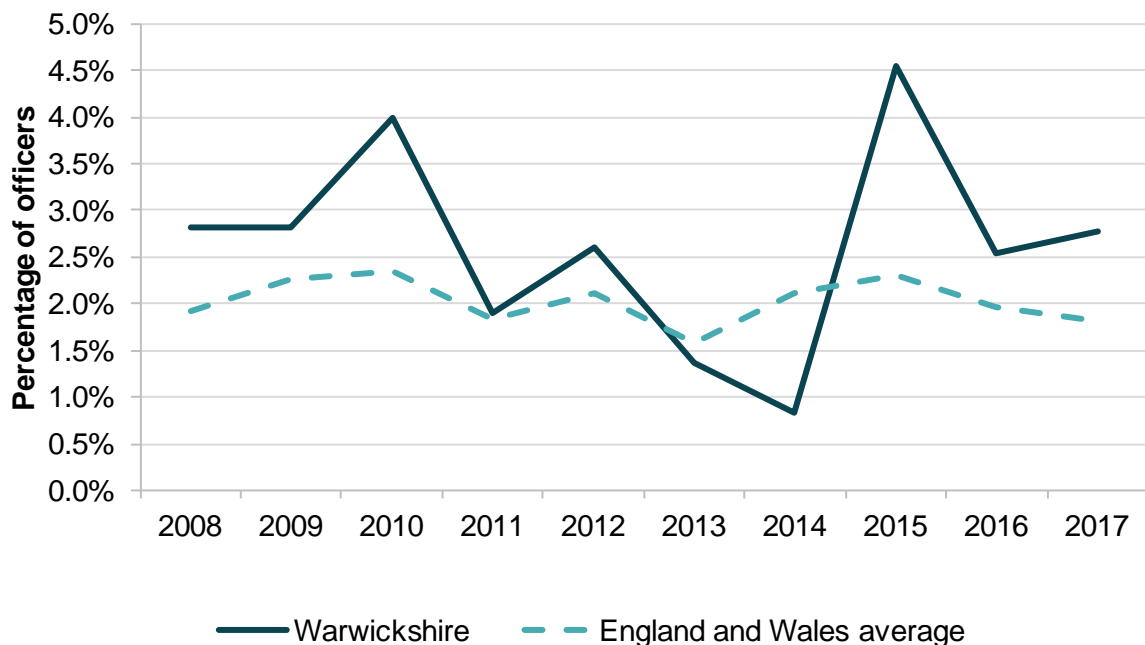
Source: Home Office Annual Data Requirement

On 31 March 2017, the percentage of officers in Warwickshire Police on long-term sick leave was 2.9 percent, while the England and Wales average was 1.9 percent. The latest year for which data are available is 2017, which saw an increase of 1.5 percentage points from the previous year. This is in line with changes over the last ten-year period (see figure 9).

Figure 9: Percentage of officers on long-term sick leave in Warwickshire Police compared with the England and Wales average, on 31 March from 2008 to 2017
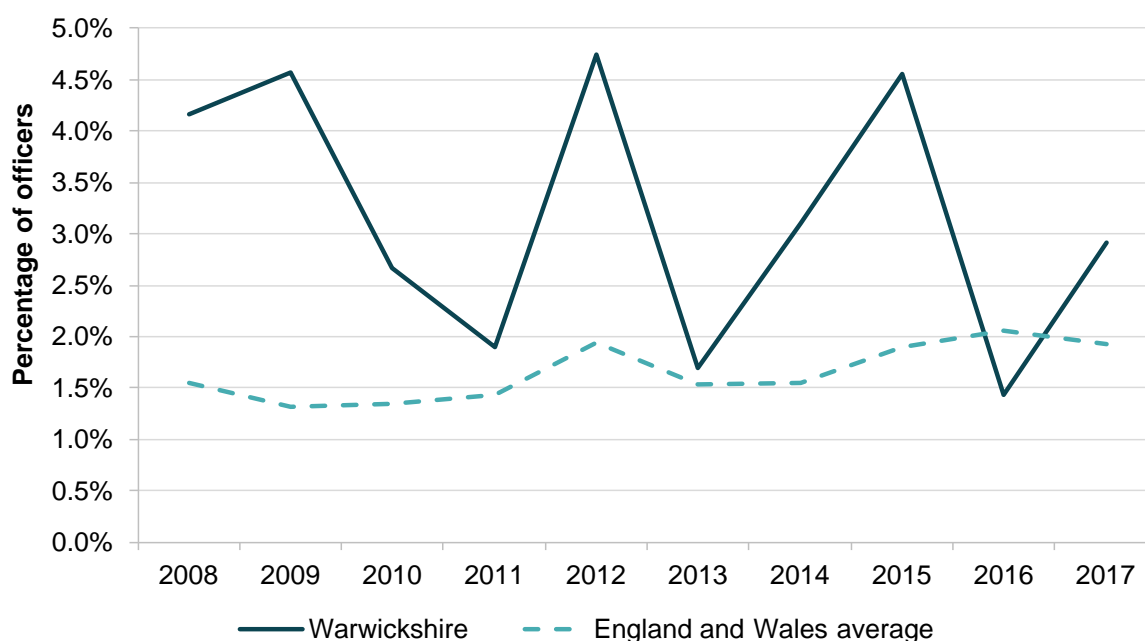
HMICFRS identified that overall sickness levels in the alliance have increased recently and, although analysis of the underlying problems has been commissioned, the reasons for this were not known at the time of our inspection. The force indicated to HMICFRS that it has reviewed its operating model and is intending to make further adjustments to it, based on analysis of demand. The alliance's change programme is comprehensive and will alter working practices for a large proportion of its workforce. However, the force needs to ensure that it possesses a thorough understanding of the threats to workforce wellbeing in order to allow it to mitigate them; this is particularly important during a time of significant change.

Taking preventative and early action to improve workforce wellbeing

Warwickshire Police uses a range of preventative measures to improve workforce wellbeing. For example, it uses surveys to understand its workforce's concerns and takes account of data including sickness levels, the accumulation of time off and injuries on duty to identify trends and patterns. Staff surveys have also been used to establish the workforce's views about discrimination. For example, it identified that some individuals did not want to provide personal information to the force about their protected characteristics when responding to surveys, believing the information would not be treated confidentially. Its diversity group is now deciding what action it will take. However, many of the initiatives to minimise the threats to wellbeing are recent developments. Supervisors do not yet feel equipped to recognise individual warning signs. However, they do have a good understanding of their welfare responsibilities; they are aware that they must refer to a seven-point plan to help support individuals injured in the workplace. Although officers and staff believe that

the alliance's wellbeing initiatives are well intentioned, supervisors indicate that the force could do more to provide them with support and guidance, so they can identify at an early stage individuals who may be experiencing mental health difficulties.

Being the subject of, or a witness to, a public complaint or an internal misconduct allegation can be very stressful for members of the workforce and affect their wellbeing. We reviewed 11 internal misconduct cases to see whether witnesses and those subject to the allegations received a satisfactory service from the force, from initial allegation through to final assessment. We found that a satisfactory service was provided in all 11 cases.

How fairly and effectively does the force manage and develop both the performance of its individual officers and staff and its selection processes?

College of Policing research on organisational justice suggests that the process for promoting people and failure to deal with poor performance may have an adverse affect on workforce perceptions of fairness, and this in turn may lead to negative attitudes and types of behaviour in the workplace.[37] In addition, effective performance management and development mitigate risks to the force and ensure continuous improvement. HMICFRS assessed how fairly and effectively forces manage the performance of individual officers and staff, including the value that forces place on continuing professional development (CPD), in line with guidance from the College of Policing.[38] Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

Managing and developing individual performance

Warwickshire Police needs to improve the way it manages and develops the individual performance of its officers and staff. The force's current arrangements are ineffective because of a lack of clear objectives and infrequent conversations between officers and staff and their supervisors, and there is limited scrutiny of the process to ensure consistency and fairness. In HMICFRS' 2016 legitimacy report, we commented on how changes to the annual individual performance assessment

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[37] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf.

[38] College of Policing guidance on the police performance development review (PDR) process is available from www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx See also the College of Policing's competency and values framework. Available from: www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx

process (referred to as PDR) had led to uncertainty among the workforce about how it should be used, in particular whether it was mandatory or optional. The situation is unchanged; the workforce tends to view the PDR process as a tick-box exercise that is of little value. We found only slight evidence of discussions about performance between supervisors and the individuals they supervise being documented. We also found little evidence of the unsatisfactory performance procedures being used to address under-performance.

The force recognises the limitations of the PDR process and has responded to HMICFRS' 2016 recommendation that it should improve how it manages individual performance by introducing a new system it believes will enable individual performance and development needs to be assessed more effectively. Continuing professional development (CPD) was trialled in several sites and, following a review, the force is expanding its use. We interviewed individuals who had completed the new CPD process; views of it are generally favourable and differ considerably from those on the PDR process. Officers and staff we spoke to said they felt this system supports an increased understanding of individual development needs and allows them greater participation when setting personal objectives. HMICFRS will monitor developments in this area with interest, due to the conflicting views of the PDR process and CPD among the workforce and the force's failure to implement an effective method of assessing and developing its officers and staff to date.

Identifying potential senior leaders

The force uses different processes to identify high potential staff and officers, meaning that high potential individuals are no longer identified by line managers in isolation and they are fairly and objectively selected. It has now introduced national initiatives, including direct entry at inspector level, Fast Track[39] and Police Now.[40] Talent mapping, the PDR process and CPD are used; however, PDR is not valued by the workforce and CPD is not yet available to all the workforce. The alliance is expanding the use of talent mapping and refining the system of assessing officers and staff so it identifies areas for development and an individual's suitability for promotion. The alliance aims to ensure that the 'right people are in the right jobs with the right skills', and they are provided with suitable opportunities to develop. It sees this as a much broader matter than development for promotion. HMICFRS noted that the force has made changes to its selection processes as a result of feedback on the previous processes; they include checks and balances to help prevent bias and a means for participants to challenge the process. The workforce generally values these arrangements and perceives them to be fair, although some members of the

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[39]For more information about Fast Track, a College of Policing leadership programme, see: http://recruit.college.police.uk/Officer/leadership-programmes/Pages/Fast-Track.aspx

[40] For more information about Police Now, a College of Policing leadership programme, see: www.policenow.org.uk/the-programme/about-the-programme/

police staff still feel there are few career development opportunities available to them. The introduction of CPD provides Warwickshire Police with a process to identify leadership potential throughout its workforce.

Selecting leaders

The force ensures that candidate competence is an established part of its promotion process. The alliance has adapted its promotion processes as a result of feedback, by employing an external recruitment manager to review recruitment, learning and development practices. Seminars are held for sergeants and inspectors, where chief officers meet candidates. Staff who administer the process described how its operation ensures common understanding. Individuals involved in assessments have received unconscious bias training, and applications are marked at the first stage without candidates' identities being revealed. The independent advisory group (IAG) and external partners are also represented on interview panels at chief officer level, to ensure that the process is fair and open.

The force has taken active steps to try to ensure that its leaders represent a range of styles, approaches and backgrounds. It identified concerns that some individuals were being deterred from promotion because of the possibility that, if successful, they would have to move long distances to a new posting. The alliance now publicises the location of vacancies, and any posting decisions are reviewed by the alliance's workforce management group to provide further assurance that decisions are fair and to balance individual and organisational needs. It has also made its promotion processes available to external candidates, a recent example being a chief superintendent selection process. The promotion system is accessible and open, and feedback is available to candidates. The workforce perceives these processes to be fair.

Summary of findings

Requires improvement

Warwickshire Police requires improvement in some aspects of treating its workforce with fairness and respect. The force's leaders demonstrate that they are open to feedback from the workforce and they involve the workforce in decision making. The force understands the importance of addressing disproportionality in the recruitment, retention and progression of officers and staff with protected characteristics, but it needs to make more progress in this area.

Officers and staff told us that senior leaders prioritise their wellbeing and they perceive this commitment to be authentic. However, pressures are evident in frontline policing roles, and the force needs to focus more on mitigating threats to workforce wellbeing, particularly in the light of imminent changes to its operating

model. The force's arrangements to assess and develop the individual performance of officers and staff are ineffective because of a lack of clear objectives, infrequent conversations and limited scrutiny. The force recognises the limitations of its individual performance assessment process (called PDR) and is taking action to address these, including expanding its use of continuing professional development. The force has made changes to its talent selection and promotion processes as a result of feedback arising from previous processes. The workforce generally values these arrangements and perceives them to be fair.

Areas for improvement

- The force should ensure that it has effective systems and processes in place that enable it to understand the underlying causes of threats to its workforce's wellbeing, and take action to mitigate them.

- The force should ensure that its supervisors can recognise warning signs, intervene early and provide support to officers and staff who may be experiencing problems affecting their wellbeing.

- The force should ensure that it has effective systems, processes and guidance to manage individual performance and identify the most talented individuals within its workforce.

Next steps

HMICFRS will assess progress on any recommendations and areas for improvement identified within its reports in a number of ways. We either re-visit those forces where we have identified a serious cause of concern, go back to assess them as part of our annual PEEL inspection programme or receive updates on their progress through regular conversations with forces.

HMICFRS highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and leadership. These reports identify problems that are reflected across England and Wales and may contain additional recommendations directed at national policing organisations, including the Home Office, where we believe improvements need to be made at a national level.

Annex A – About the data

Data used in this report

The source of the data is presented with each figure in the report, and is set out in more detail in this annex. The source of Force in numbers data is also set out below.

Methodology

Please note the following for the methodology applied to the data.

Comparisons with England and Wales averages

For some datasets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. This is calculated by using the difference from the mean average, as a proportion, for all forces. After standardising this distribution, forces that are more than 0.675 standard deviations from the mean average are determined to be above or below the average, with all other forces being broadly in line.

In practice this means that approximately a quarter of forces are lower, a quarter are higher, and the remaining half are in line with the England and Wales average for each measure. For this reason, the distance from the average required to make a force's value above or below the average is different for each measure so may not appear to be consistent.

The England and Wales averages will differ slightly from the Value for Money Profiles because we have included City of London Police and the Metropolitan Police Service within the average in this publication.

Statistical significance

When commenting on statistical differences, a significance level of 5 percent is used.

For some forces, numbers described in the text may be identical to the England and Wales average due to decimal place rounding, but the bars in the chart will appear different as they use the full unrounded value.

Population

For all uses of population as a denominator, unless otherwise noted, we use the Office for National Statistics (ONS) mid-2015 population estimates.

Note on workforce figures

All workforce figures are from the Home Office Annual Data Return (ADR) published in the Home Office's published police workforce England and Wales statistics (available from www.gov.uk/government/collections/police-workforce-england-and-wales), or the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

This year we have tried to align our workforce categories with those in the Home Office workforce Statistics publication.

This means data presented on the gender and ethnic diversity of the workforce we have not included Section 38-designated officers within the 'Police Staff' category so that these figure will read across to the workforce publication more easily. However we have included Section 38-designated officers within descriptions of the total workforce to be consistent with HMICFRS Efficiency reports.

Please note that all workforce figures are in full-time equivalent (FTE) unless otherwise stated and exclude traffic wardens and special constables.

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff[41]. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

For FTE, these data include officers on career breaks and other types of long-term absence, and excludes those seconded to other forces.

Ethnic diversity and gender diversity

Data may have been updated since the publication. As noted above to align categories with Home Office publication the Police Staff category does not include Section 38-designated officers. Staff ethnicity data are derived from headcount rather than FTE.

Grievances

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager).

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[41] See sections 38 and 39 of the Police Reform Act 2002. Available at: www.legislation.gov.uk/ukpga/2002/30/section/38

Stop and search

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 publication (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop and search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. The population data used is usual residents by ethnicity from the 2011 census.

Figures throughout the report

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE) compared with white people, in the local population of Warwickshire Police in the 12 months to 31 March 2016

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. Data may have been updated since publication. The likelihood of a stop and search is based on the number of stop searches per 1,000 population for each ethnic group. The population data used is usual residents by ethnicity from the 2011 census. These are the most robust and up-to-date population breakdowns by ethnicity.

Figure 2: Grievances raised per 1,000 workforce, in Warwickshire Police in the ten months from 1 April 2016 to 31 January 2017

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Warwickshire Police in the ten months from 1 April 2016 to 31 January 2017

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager). Differences between forces in the number of raised grievances may be due to different handling and recording policies.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Warwickshire Police in 2016/17, compared with the percentage of BAME people in the local population

These data are derived from ADR 511, 512 and 521. Data may have been updated since the publication. Officer ethnicity totals are based on numbers of people (referred to in the Home Office data as headcount) rather than FTE.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Warwickshire Police from 2007/08 to 2016/17

These data are derived from ADR 511 and 531. Data may have been updated since the publication. Officer ethnicity totals are headcount rather than FTE.

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Warwickshire Police in 2016/17 compared with the percentage of women in the England and Wales population

These data are derived from ADR 502 and 521. Data may have been updated since the publication.

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Warwickshire Police from 2007/08 to 2016/17

These data are derived from ADR 502 and 531. Data may have been updated since the publication.

Figure 8: Percentage of officers on short or medium-term sick leave, in Warwickshire Police compared with the England and Wales average, on 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552 and published in the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

Figure 9: Percentage of officers on long-term sick leave, in Warwickshire Police compared with the England and Wales average, as at 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552. (available from www.gov.uk/government/statistics/police-workforce-open-data-tables). Long-term sick leave is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2017. Data may have been updated since the publication.

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by working back in time from 7 January 2017 until a total of 200 was reached.[42] This amounted to a total of 8,574 records – some records provided were not actually records of stop and search encounters, and these were excluded. As part of our assessment, we gave forces the opportunity to review our findings and make representations.

As in 2013 and 2015, HMICFRS reviewed each record to assess the reasonableness of the recorded grounds. However, this year we also identified how many of the records reviewed were carried out to search for drugs and whether stop and search was carried out for drugs, whether the suspicion involved possession only or the more serious supply-type offence. Currently forces are not required to differentiate between the two. We did this so that we could ascertain how many in our sample were for possession of drugs, rather than supply, as high rates of possession-only searches are unlikely to fit with force priorities.

This year, for the first time, we assessed whether or not the use of stop and search powers prevented an unnecessary arrest. We did this to ascertain how many of the records reviewed involved allaying the officer's suspicion in circumstances where the person would otherwise have been arrested, thereby representing a positive use of the powers. Allaying suspicion and preventing an unnecessary arrest is as valuable as confirming suspicion by finding the item searched for.

Professional standards case file review methodology

During February and March 2017, inspection teams from HMICFRS visited the individual or professional standards departments working collaboratively of each force to conduct a case file review. We asked forces to provide us with the last case files they had finalised up to 31 December 2016; but going back no further than two years. We asked to see:

- 10 complaints the force had recorded as containing an allegation of discrimination

- 15 complaints the force had recorded in categories we felt may contain unidentified allegations of discrimination

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[42] City of London Police was unable to provide records up to 7 January 2017 but instead provided 200 records from 4 October 2016 to 26 November 2016.

- 10 service recovery complaints (if the force operated a separate service recovery scheme)

- 10 internal misconduct allegations the force had recorded as containing an allegation of discrimination

- 10 other internal misconduct allegations (so that we could ascertain if they contained unidentified allegations of discrimination)

- 10 grievances (and 10 workplace concerns if the force recorded these separately)

We assessed these case files against the relevant legislation, guidance and code of practice[43] to answer the following questions:

- Access to the system – Has the force identified those cases where the complainant requires additional support to make their complaint, and has that support been provided?

- Initial information – When the complaint was recorded, did the force provide the complainant with a copy of the complaint record, an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details)?

- Keeping complainants updated – Has the force provided complainants, witnesses, and those who are the subject of the complaints with regular, meaningful updates?

- Final outcome – Did the force provide the complainant with the findings of the report, its own determinations and the complainant's right of appeal?

- Handling discrimination – Has the force failed to identify any allegations of discrimination? Have any discrimination cases that meet the IPCC mandatory referral criteria been so referred? Has the force investigated the complaints alleging discrimination satisfactorily? Overall, has the complainant making an allegation of discrimination received a good service from the force?

- Grievances/workplace concerns – Has the force identified, investigated and resolved the grievance satisfactorily? Has the force put arrangements in place to support the employees or witnesses throughout the process? Did the witness and those who are subject to the allegations receive a satisfactory service from the force?

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[43] Relevant police complaints and misconduct legislation, IPCC statutory guidance, IPCC guidelines for handling allegations of discrimination, Acas code of practice on disciplinary and grievance procedures and Acas discipline and grievance guide.