



Promoting improvements
in policing to make
everyone safer

PEEL: Police legitimacy 2016

An inspection of Gloucestershire Constabulary



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Introduction

As part of our annual inspections of police effectiveness, efficiency, legitimacy and leadership (PEEL), Her Majesty's Inspectorate of Constabulary (HMIC) assesses the legitimacy 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). It is therefore 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 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 those decisions), as well as being friendly and approachable.¹ This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for 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 themselves are being treated fairly and respectfully, particularly by their own police force. It is therefore important that the decisions made by their force about the things that affect them are perceived to be fair.² This principle is described as 'organisational justice', and HMIC considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

¹ *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

² *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%20FINAL_REPORT.pdf

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 tackle corruption. 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.

HMIC's legitimacy inspection assessed all of these areas during 2016. More information on how we inspect and grade forces as part of this wide-ranging inspection is available on the HMIC website (www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/). This report sets out our findings for Gloucestershire Constabulary.

Reports on Gloucestershire Constabulary's efficiency and leadership inspections are available on the HMIC website (www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/gloucestershire/). Our reports on police effectiveness will be published in early 2017.

Force in numbers



Workforce

Total workforce as of 31 March 2016

1,800

Total workforce breakdown as of 31 March 2016

officers	staff	PCSOs
1,090	592	118



Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

2.1

officers	staff	PCSOs
2.1%	1.8%	3.6%

Percentage of BAME in local population, 2011 Census

4.6%



Gender diversity

Percentage of females in overall workforce 31 March 2016

41%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

31%

Gloucestershire Constabulary

officers

58%

staff

50%



Public complaints

Number of public complaints per 1,000 workforce 12 months to 31 March 2016

Officers

Gloucestershire Constabulary

327

England and Wales force average

268

Staff (including PCSOs)

58

61



Grievances

Number of grievances per 1,000 workforce raised and finalised 12 months to 31 March 2016

Officers

Gloucestershire Constabulary

5.5

England and Wales force average

4.8

Staff (including PCSOs)

5.6

6.8



Victim satisfaction

Victim satisfaction with their overall treatment by the police 12 months to 31 March 2016

Gloucestershire Constabulary

95.4%

England and Wales force average

93.4%

For further information about the data in this graphic please see annex A

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

Overall judgment³



Requires improvement

Gloucestershire Constabulary has been assessed as requiring improvement in respect of the legitimacy with which it keeps people safe and reduces crime. Our findings this year are not consistent with last year's findings, in which we judged the force to be good in respect of legitimacy. The force has a well embedded ethical culture and identifies corruption risks from its own staff. However it could improve the audits of its IT systems and the way it addresses the risks of its workforce abusing their position for sexual gain. The force could improve how it learns lessons from previous incidents and the performance assessment process for officers and staff.

Overall summary

The force has well-embedded, clearly defined and well-understood values and behaviours that link to the Code of Ethics. Officers and staff clearly understand the expectation of treating people with fairness and respect, and the force has seen an improvement in public satisfaction over the past 12 months.

The force ensures that its workforce behaves ethically and lawfully. It abides by national guidelines in relation to vetting, which is done to a good standard. Officers and staff show awareness of the required standards of behaviour. However, the force does not do anything beyond or different from its normal processes proactively to identify officers and staff potentially abusing their powers for sexual gain. The force's anti-corruption unit acts on information that identifies potential corruption. Governance meetings between the professional standards department, the anti-corruption unit and the force's appropriate authority have not been held recently, which poses a risk to the force.

The force works with communities in a variety of ways about outcomes of misconduct and corruption cases, and gross misconduct cases are publicised on the force website. However, we found no systematic analysis of the feedback received from communities.

³ HMIC judgments are: outstanding, good, requires improvement and inadequate.

The force seeks feedback and challenge from the workforce. The force has a process in place to undertake both annual and quarterly staff surveys. Although the results appear on the intranet, there are concerns about the communication of the survey results, the lessons learned and what actions have been taken as a result of the survey.

Staff spoken to generally had confidence in 'fairness at work' and grievance policies. However, the force acknowledges that confidence in the process has been eroded and that not all staff perceive the process as being fair and effective. The force needs to do more to be open and transparent in the decision-making process, allowing the workforce to see clearly that force policies are being followed and that there is consistency in the decisions made.

The force has a wellbeing board that is chaired by the chief constable. Wellbeing of staff is a key element of the force's 'people' strategic objective within the strategic business plan, and it has been a topic of recent leadership days.

Recommendations

HMIC has not identified any causes of concern and has therefore made no specific recommendations.

Areas for improvement

- The force should improve how it seeks feedback from the people it serves about their experiences (or perceptions) of how the police have treated them.
- The force should improve how it identifies and understands the issues that have the greatest impact on public perceptions of fair and respectful treatment.
- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
- The force should ensure that it has the capability to monitor all its computer systems to identify risks to the force's integrity.
- The force should improve how it identifies and understands issues for organisational learning.
- The force should improve the governance structures between the chief officer team and the professional standards department and the anti-corruption unit.
- The force should improve how it manages individual performance.

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 them openly and clearly), while being consistently friendly and approachable.⁴

While HMIC recognises that police legitimacy stems from much broader experiences of the police than direct contact alone, our 2016 inspection focused specifically on public perceptions of fair treatment. Our inspection aims to assess how far the force can demonstrate the importance it places on maintaining procedural justice, and the extent to which it is seeking feedback to enable it to prioritise and act on those areas that have the greatest negative impact on public perceptions of fair and respectful treatment

(e.g. stop and search, surveillance powers or use of force). This should include how the force is approaching those groups that have the least trust and confidence in the police.

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

It is important for the police to understand that it is procedural justice – making fair decisions and treating people with respect – that drives police legitimacy in the eyes of the public, over and above police effectiveness at preventing and detecting crime.⁵ HMIC assessed the extent to which the importance of procedural justice was reflected in the force’s vision and values, and the extent to which it was understood by the workforce.

Organisational values

The force places a high value on the importance of treating people with fairness and respect and this is a fundamental part of the vision and values of the organisation. Staff have a good understanding of the force’s values and ethics, are encouraged to challenge processes or decisions, and many are confident to report inappropriate behaviour in the workplace. The force has continued to promote an ethical culture and has developed a behaviour set of ‘FAIR’ principles: fairness, accountability,

⁴ *It’s a Fair Cop? Police legitimacy, public co-operation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

⁵ *Ibid.*

integrity and respect. In addition, it has conducted 11 training sessions to educate officers and staff on how victims may be feeling, and to encourage them to show empathy in response. Approximately 400 officers and staff attended these events.

The importance of treating people with fairness and respect is clearly articulated within the force's values, and ethical behaviour is well embedded in many of its policies and practices. The force continues to reinforce the importance of this approach through its well-embedded, clearly defined and well-understood values and behaviours. It now has a single internal communications campaign, called Serving our Communities, which was launched this year as the vehicle to promote and celebrate desired staff behaviours. These values and behaviours link to those set out in the Code of Ethics. Every member of the workforce we spoke to told us that they understand the importance of treating people fairly and with respect, and how this relates to public confidence.

Public satisfaction and confidence feature prominently in the force's performance framework and are discussed both force-wide and at a local policing area level. When standards and values are not adhered to, the force communicates misconduct outcomes to the workforce, including volunteers. This reinforces appropriate behaviours and improves understanding of the consequences of misconduct.

Officers and staff clearly understand the expectation that they will treat people with fairness and respect, and the force has seen an improvement in public satisfaction over the past 12 months. The simplified 'FAIR' behaviour set is published on the intranet and widely displayed on posters. FAIR behaviours were first launched at the senior leaders' forum (SLF) in 2015 and reinforced at the SLF in February 2016. To support the principles, the force developed a 'plan on a page 2016/17'. This sets out how the behaviours that are expected of staff contribute to the commitments made to communities.

HMIC found evidence that the chief constable has put a considerable amount of work into developing and maintaining an ethical culture across the organisation, including regular messages in a variety of internal communications, such as the weekly bulletin. There are also well-established mission statements that include the force's intent, values and principles, and these have been communicated to the workforce.

The force is involved in a research project with Durham University to study the impact of workplace factors on employees and the effect they have on their service to the public. The project is based on evidence that treating employees fairly correlates with improved employee behaviour towards the public. The force conducted a baseline survey in November 2014 and a tracker survey in June 2015, and there are plans to complete a third survey this year. The tracker survey included questions to measure attitudes towards civic duty. The results showed an improvement for both officers and staff since the initial survey was conducted.

HMIC found evidence that the workforce has a good awareness of the force's values and ethics. The Code of Ethics is well known and understood throughout the organisation. The force has moved away from a target-driven performance culture and encourages leaders to challenge on occasions when outcomes are not appropriate. It is embedding a culture of fairness and 'doing the right thing'. Those we spoke with during the inspection confirmed that the chief constable is particularly proactive in promoting the importance of the force's values and the Code of Ethics through a variety of initiatives. For example, as part of the Serving our Communities work, a series of videos involving victims of crime have been shown to officers. In these videos, victims describe what happened to them and explain the impact an officer's behaviour can have on a victim's experience.

As HMIC found last year, the force continues to promote an ethical culture with its set of 'FAIR' behaviour principles. To support these principles, the force developed a 'plan on a page 2016/17', which sets out how the behaviours expected of staff contribute to the commitments made to communities. These desired behaviours form the core of the new leadership programme and are being included in all new training modules. In addition, the force has provided 11 training sessions to educate officers and staff on how victims may be feeling, and to encourage them to show empathy in response. This includes, as part of the force's Serving our Communities work, a series of videos involving victims of crime. Officers and staff clearly understand the expectation of treating people with fairness and respect, and the force has seen an improvement in public satisfaction over the past 12 months.

Public satisfaction and confidence feature prominently in the force's performance framework and are discussed both force-wide and at a local policing area level.

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

HMIC's 2015 legitimacy inspection found a positive picture of how forces were engaging with communities. This year HMIC's assessment focused specifically on the extent to which forces are working to identify and understand the issues that have the greatest impact on people's perceptions of fair and respectful treatment, including how well they seek feedback and challenge from the people they serve.

Seeking feedback and challenge

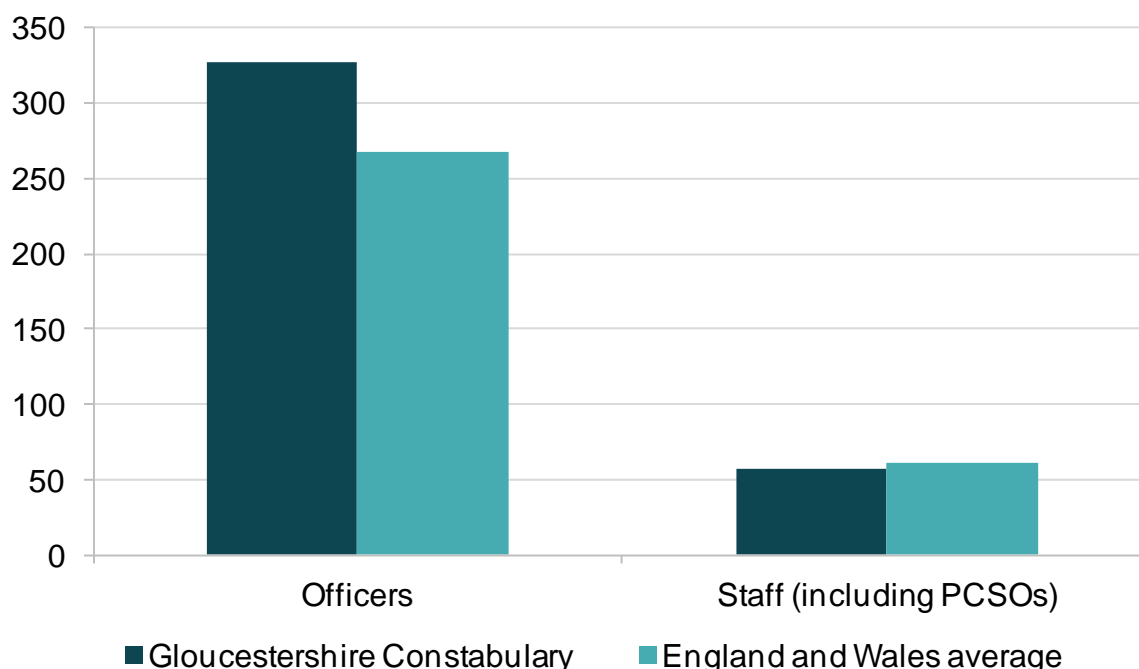
Gloucestershire Constabulary seeks feedback to identify those issues and areas that have the greatest impact on people's perceptions of fair and respectful treatment. However, we found no systematic analysis of the feedback received. To develop an overall understanding of the issues and identify those that have the greatest impact

on public perceptions, the force would benefit from being able to record and analyse specific feedback and challenge for fair and respectful treatment from its engagement activities in a more co-ordinated way.

Identifying and understanding the issues

Each force in England and Wales is required to record the nature of complaint cases and allegations and be able to produce complaints data annually. The numbers and types of complaints are valuable sources of information for forces and can be used to help them identify areas of dissatisfaction with their service provision, and take steps to improve how they treat the public.

Figure 1: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) in Gloucestershire Constabulary compared with England and Wales, in the 12 months to 31 March 2016



Source: HMIC Legitimacy data collection

For further information about the data in figure 1 please see annex A

In the 12 months to 31 March 2016, Gloucestershire Constabulary recorded 327 public complaint cases per 1,000 officers, which was higher than the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 58 public complaint cases per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 61 cases per 1,000 staff (including PCSOs).

The most recent Independent Police Complaints Commission (IPCC) data from forces show that, for April, May and June 2016, the types of complaint most frequently recorded by Gloucestershire Constabulary are 'other neglect or failure in duty', 'incivility, impoliteness and intolerance', 'lack of fairness and impartiality and

'other irregularity in procedure'.⁶ It is important to note, however, an issue identified during our 2014 inspection on police integrity and corruption:⁷ complaint allegation categories used by different forces may overlap with each other. For instance, similar allegations might be recorded by one force as 'other neglect or failure in duty', and by another force as 'other irregularity in procedure' or 'lack of fairness and impartiality'. This means there is no definitive way of establishing accurately the number of public complaints about certain behaviours.

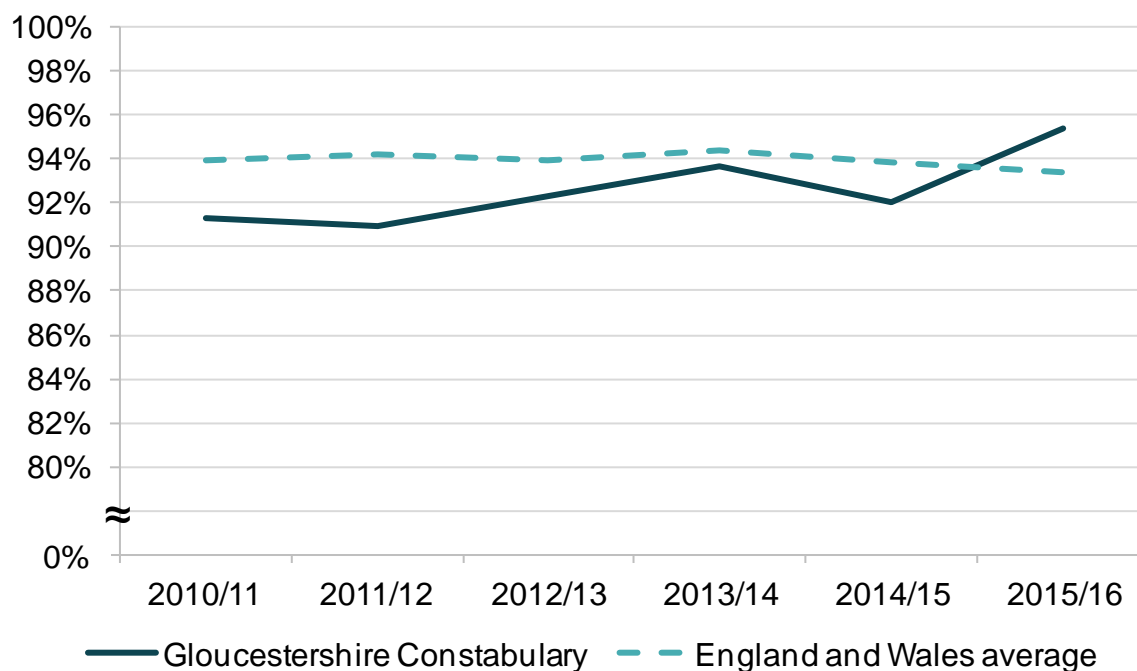
The force's Channel Management Project began in January 2016. It aims to develop a communication management strategy with a robust implementation plan to improve the experience of the public when accessing its services. This is in the early days of development, but there is a planning board in place and, through the force and PCC's governance arrangements, a strategy is expected to be ready by September 2016.

All forces are required to conduct victim satisfaction surveys with specified victims of crime groups and provide data on a quarterly basis. The surveys take account of victims' experience of the service provided to them by the police and inform forces' improvements to their service provision, including examining how well victims feel they are treated.

⁶ Independent Police Complaints Commission data is available at:
www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

⁷ *Integrity Matters*, HMIC, January 2015. Available from:
www.justiceinspectors.gov.uk/hmic/publications/integrity-matters/

Figure 2: Percentage of victims satisfied with overall treatment by Gloucestershire Constabulary compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016



Source: Home Office Annual Data Requirement
For further information about the data in figure 2 please see annex A

In the 12 months to 31 March 2016, 95.4 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Gloucestershire Constabulary, which was higher than the England and Wales average of 93.4 percent; and higher than the 92.0 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015. This is a statistically significant difference.

The force carries out two surveys: a monthly user satisfaction survey and a local policing survey. After HMIC’s domestic abuse inspection in 2013, the force also carried out a victim satisfaction telephone survey to gain a better understanding of the experiences of domestic abuse victims. The survey was carried out by a third party agency called Gloucestershire Domestic Abuse Support Service (GDASS). The lessons learned from the survey have been included in training programmes designed to increase officers’ knowledge and awareness.

The force has identified communities that have less trust in the police, and then worked with those communities to build trust. For example, it has established a community intelligence team (comprising one sergeant, four police constables and two PCSOs) which involves influential local people and businesses in its work and maintains regular contact with them. The aim is to reassure those living in the community through regular contact with representatives of the community, and to establish and manage a good information flow between them and the force. The main contacts within the community inform the team of any relevant issues. The

Gloucester neighbourhood team has worked specifically with black, Asian and minority ethnic (BAME) victims of crime, who were identified as being less likely than white victims to be satisfied with the service that they receive from the police. Examples of this activity include regular local radio appearances to discuss issues of relevance to the BAME community, and direct face-to-face meetings with community leaders. The team was able to identify the reasons for the lower levels of trust and confidence, and efforts have been made to raise standards in terms of courtesy and respect, and to strengthen relationships between the community and the police. These efforts have resulted in improved relationships and better targeting of police activity.

The force has reported an improvement in public satisfaction rates since these approaches have been adopted. It is currently rated eighteenth out of the 43 forces in England and Wales for 'satisfaction', a rise of 17 places over just two quarters. It has been running a pilot project in Stroud, where neighbourhood inspectors seek feedback to influence the specific policing of the local area. They make recommendations and include specific objectives in the neighbourhood officers' annual performance development reviews (PDRs) to address community concerns.

800 people were surveyed on the proposed rise in the precept, which included their views on what the main priorities for the force should be. A similar method was used to understand the public's views on the use and expansion of automatic number plate recognition (ANPR) and stop and search powers.

The force has sought and acted on advice from members of an independent advisory group (IAG) on how it should approach those communities that have less trust and confidence in the police, and those whose voice is often not heard. The IAG meets once a month and its chair sits on several force strategic meetings specially to raise issues related to public perception. These include the use of stop and search, and of Taser. Policies and procedures have been influenced by public perceptions and the chair of the IAG has been instrumental in reviewing policies to ensure that public perceptions continue to be taken into account. The IAG is representative of the community in that it includes young people, members of the BAME community, and individuals who have some of the nine protected characteristics⁸ such as age, disability or gender reassignment. The IAG has been actively involved in the force's use of stop and search powers for many years. This has enabled the force to take into account the views of the community when developing training for officers.

⁸ For more information about protected characteristics, see: www.gov.uk/discrimination-your-rights/types-of-discrimination

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,⁹ the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search scheme.¹⁰ The scheme aims to increase transparency and community involvement, and to support a more intelligence-led use of the powers, leading to better outcomes. All police forces in England and Wales signed up to participate in the scheme. In 2015, HMIC's legitimacy inspection¹¹ considered the extent to which the force was complying with the scheme and found that it did not comply with four features of the scheme. Consequently, the Home Secretary suspended the force from participation in the scheme. In 2016, we revisited the force to assess its compliance with the scheme and found that it still did not comply with two features: recording and publishing outcomes and monitoring the impact, particularly on black, Asian and minority ethnic people and young people. However, we are satisfied that the force has, since our revisit, achieved compliance with all features of the scheme. Details of our revisit can be found on HMIC's website at

www.justiceinspectorates.gov.uk/hmic/publications/best-use-of-stop-and-search-scheme

In HMIC's PEEL legitimacy inspection 2015/16, we found more work was needed to ensure that officers understood what constituted reasonable grounds for stop and search. We dip-sampled 100 stop and search records and we were concerned that a high proportion of the records we checked did not demonstrate clearly enough that there had been reasonable grounds to undertake a lawful stop and search. The force has worked constructively to address this issue and has actions in place to make the necessary improvements.

Two PCSOs are seconded to the central communications and engagement team, and they work across the county to supplement the work conducted by locally based PCSOs, providing centralised communication, education and some feedback on communities' views of the services being provided.

The independent custody visitor (ICV) scheme gives the force feedback on the types of issues raised about the fair and respectful treatment of detained people. Issues identified by ICVs while present in the custody offices are acted on immediately whenever possible. The independent custody scheme manager regularly meets with

⁹ *Stop and Search Powers – Are the police using them effectively and fairly?* HMIC, July 2013. Available from: www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/

¹⁰ *Best Use of Stop and Search Scheme*, Home Office, August 2014 www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf

¹¹ *PEEL: Police legitimacy 2015 – A national overview*, HMIC, 2016. Available at: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/

the force custody lead to discuss any of the issues raised by the ICVs. The force is actively seeking to recruit ICVs from BAME communities and groups who are less likely to complain or take part in traditional forms of engagement because these groups are currently under-represented within the scheme. It has developed a recruitment action plan to approach as many diverse groups across Gloucestershire as possible to improve the demographic representation within the scheme.

Reports of dissatisfaction with the service can be collected in a number of ways. All complaints received are reviewed and allocated by the local neighbourhood inspector. A log on the force's incident recording system is normally created and has the potential to be flagged to the professional standards department. However, this is not always done. Outcomes are fed back to the complainant on both formal complaints and expressions of dissatisfaction against the force. Complaints are analysed and trends identified. This information is used to help the organisation develop the legitimacy of the workforce.

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

It is important that as well as actively seeking feedback from the public, the force also responds to that feedback. HMIC assessed the extent to which this response includes changes to the way the force operates to reduce the likelihood of similar incidents occurring in future, as well as resolving individual incidents or concerns, and how well the force communicates to the public the effectiveness of this action.

Making improvements

Gloucestershire Constabulary uses a variety of methods to seek feedback on people's perceptions of fair and respectful treatment. These include recording complaints and compliments, discussing local initiatives, and consulting ICVs and members of the IAG, all of which helps to identify principal themes. However, more could be done to analyse the extent to which these efforts are making a difference. We found limited evidence of the force assessing how well and widely these messages are being received and understood. The force could also improve the way it communicates with the public on how it uses learning from feedback to improve the services it provides.

In HMIC's 2015 legitimacy inspection,¹² we recognised that the force worked well with all the people it served, and that it valued and promoted positive involvement with the public as a way of improving legitimacy. The force has taken positive steps

¹² *PEEL: Police legitimacy 2015 – An inspection of Gloucestershire Constabulary*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015-gloucestershire/

to improve accuracy in recording the number of complaints it receives. It acknowledges that there has been an increase in the number of recorded complaints. The force has arranged awareness training for supervisors, so that now more cases are referred appropriately to the PSD that may not have been referred previously.

The force records and tracks all complaints. All the issues raised are reviewed by the continuous improvement team to identify the main themes and also any learning that can be applied to improve the service to victims. The team works alongside the training, communications and engagement team to promote knowledge and understanding of successful individual interactions and their importance in contributing to public confidence. The continuous improvement team reviews the public surveys, the issues raised and any resolution. The learning from complaints and the public surveys is also fed back to the continuous improvement team. The team produces a report each month for each of the six local policing areas and for the force control room. These reports highlight good practice and areas for improvement.

Demonstrating effectiveness

An example of how the force learned from a case and changed the way its officers worked involved a young woman from Gloucester who was murdered by her ex-partner in 2014. The case resulted in both a domestic homicide review and an Independent Police Complaints Commission (IPCC) investigation. Following these reports, the force reviewed how it exchanged information with other agencies and changes were made within the multi-agency safeguarding hub (MASH). It organised roadshows to disseminate learning to the workforce. These were led by an independent consultant. The lessons learned were shared with the public, including through digital media such as YouTube. The force also gave it workforce external training in relation to domestic abuse and allocated extra resources to safeguarding. It asked the victim's father to be an independent member of the force's protective services strategic delivery board. It also supported the development of a mobile application ('app') that can be downloaded onto smartphones and mobile devices, and used in relation to safeguarding. People can activate the app when they are in distress and it sends their location to an assigned contact. Other features include a stealth alert and a high-pitched alarm.

The force consults with those who have less confidence in the police to promote their understanding of fair and respectful treatment. For example, it has set up a community engagement group (force control room community consultation group) for the force control room to support local community involvement. This is a forum where local people can work with the force's force control room staff and managers to discuss procedures and practices. The membership of the group comprises residents drawn from the local communities. It is outward-looking and actively seeks the views of those who contact the police. The group plays a proactive role in

developing force control room practices and procedures to improve the service provided to the public. Specific activities have included an open day, when members of the public were invited into the control room, and a bespoke survey to collect their views and identify any issues that individuals had encountered when contacting the police. This resulted in changes to the 101 call options and to email templates for automated and non-automated responses to requests for service via the force's email address.

To ensure that the requirements of vulnerable victims are understood and, whenever appropriate, included in officer training and policy development, the force conducts specific consultation exercises on vulnerability issues such as domestic abuse and hate crimes. In addition, the force and the office of the police and crime commissioner (OPCC) have used specific focus groups and survey teams. For example, after the closure of some police stations, yellow intercom devices were placed outside the existing buildings enabling contact with the police. The force then found that these represented a communication barrier for people with hearing impairment. Community involvement with the deaf community later resulted in a force-wide review of accessibility.

The force publishes and publicises learning from serious case reviews, domestic homicide reviews and IPCC investigations. Principal messages are communicated to the public through social media channels and the traditional media, identifying the action the force has taken and the lessons it has learned.

Summary of findings



Good

The force has well-embedded, clearly defined and well-understood values and behaviours. These values and behaviours link to the values and behaviours set out in the Code of Ethics.

The chief constable has invested a considerable amount of effort into developing and maintaining an ethical culture across the organisation.

HMIC found evidence that the workforce have a good understanding of the force's values and ethics. The Code of Ethics is well known and understood throughout the organisation. Staff surveys are carried out regularly, allowing the force to understand how the workforce views public service, fairness and respect.

The force strives to seek feedback and identify those issues and areas that have the greatest impact on people's perceptions of fair and respectful treatment. However, the force does not have an engagement and communications strategy. The Channel

Management Project began in January 2016 and is in the early stages of development.

The force publishes and publicises the learning from serious case reviews, domestic homicide reviews and IPCC investigations.

Areas for improvement

- The force should improve how it seeks feedback from the people it serves about their experiences (or perceptions) of how the police have treated them.
- The force should improve how it identifies and understands the issues that have the greatest impact on public perceptions of fair and respectful treatment.

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.¹³ Given the continued importance of this topic, we are returning in this question to those national recommendations emerging from the 2014 report from that inspection that our 2015 legitimacy inspection did not cover. Our inspection focus this year also reflects research showing that prevention is better than cure: the best way to ensure that police workforces behave ethically is for the forces to develop an ethical culture and to have systems in place to identify potential risks to the integrity of the organisations, so that forces can intervene early to reduce the likelihood of corruption.¹⁴

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

One of the first things forces can do to develop an ethical culture is to use effective vetting procedures to recruit applicants who are more likely to have a high standard of ethical behaviour and to reject those who may have demonstrated questionable standards of behaviour in the past, or whose identities cannot be confirmed.

Once recruited, one of the best ways to prevent corruption from occurring among the workforce is by establishing an ethical working environment or culture. To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.¹⁵ This year, HMIC focused on assessing progress in those areas highlighted for improvement in our 2015 legitimacy inspection and our 2014 integrity and corruption inspection.

¹³ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹⁴ *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

¹⁵ *Promoting Ethical Behaviour and Preventing Wrongdoing in Organisations*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf and *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 and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Initial vetting

The force complies with national police vetting policy¹⁶ and understands the extent to which the vetting process may affect recruitment of a diverse workforce. Vetting is done to a good standard and efforts are made to complete the work to the national standard, which includes the ability to check social media sites (open source), depending on which level of vetting clearance is required. The force is in the process of re-vetting all staff and is well on the way to completing this exercise. A review was conducted last year to ensure that those currently employed by the force hold the correct and up-to-date level of vetting for their current role. This revealed backlogs in the vetting process that had arisen because there were not enough staff to carry out the work. The force recognised this and the deputy chief constable set up a meeting to establish how the backlog could be reduced and the risk mitigated. The vetting team was increased from three full-time staff to nine, using temporary staff and seconded officers with health restrictions. As a result, the backlog has now been considerably reduced and all outstanding staff requiring vetting are subject to an assessment of risk to help prioritise the process.

All new staff and volunteers appointed are vetted. The information on vetting is maintained by human resources (HR). Re-vetting is applied to all those appointed on promotion and all officers who transfer from other forces. The force has a good understanding of the issues and applies the principles fairly, in an open and transparent way. The head of vetting sits within the professional standards department and the team is very well supported by the force.

The College of Policing's 'disapproved register' contains details of those officers who have been dismissed from the service or who either resigned or retired while subject to a gross misconduct investigation where it had been determined there would have been a case to answer. The force complies with its obligations to provide the College of Policing with details of those officers and staff who have been dismissed from the service for inclusion on the current disapproved register.

Clarifying and reinforcing standards of behaviour

The force clarifies and continues to reinforce acceptable and unacceptable standards of behaviour. For example, there are weekly communications from the chief constable that include the values of the organisation and a link to the Code of Ethics. The values and Code of Ethics are also included in the leadership days and in all training sessions provided by the force. Officers transferring to Gloucestershire Constabulary from other forces are given handouts on the Code of Ethics, force values and principles by a chief officer.

¹⁶ ACPO / ACPOS National Vetting Policy for the Police Community, Association of Chief Police Officers, 2012. Available from: www.northants.police.uk/files/documents/Freedom Of Information/ac^ACPO National Vetting Policy.pdf

ACPO is now the National Police Chiefs' Council.

The professional standards department manages the internal and external publication of the gifts and hospitality register and the business interests register and includes links to the respective policies.

All staff spoken to during the inspection clearly understood the risks associated with inappropriate associations and the need to discuss them with their line manager. This requirement is included as an element in the staff annual performance process, which is linked to the Code of Ethics. The annual professional development review also includes a section to ensure the member of staff is aware of the requirement to apply for approval for any business interests and of how to manage any notifiable associations.

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

HMIC's 2014 police integrity and corruption inspection emphasised the need for forces to make arrangements for continuous monitoring of their ethical health, through active monitoring of force systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts and hospitality, and public complaints.¹⁷ These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

This year HMIC was particularly interested in how well forces – from dedicated anti-corruption units to individual supervisors – are identifying and intervening early to reduce individual and organisational vulnerabilities (i.e. those individuals, groups or locations that may be susceptible to corruption). We also assessed how well forces are seeking and assessing intelligence on potential corruption, with a focus on those areas for improvement identified in our previous inspections.

Identifying and understanding risks to integrity

The force is able to identify and monitor the risks to the organisation from its own staff. However, it does not have a counter-corruption strategy to identify risk and prioritise work, and it has not developed its own counter-corruption strategic threat assessment. It tests itself against the national threat assessment and addresses the issues through the following processes:

- educating staff;
- early intervention;

¹⁷ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

- using software to identify concerns earlier;
- carrying out ethical interviews;
- using bulletins on lessons learned; and
- communicating through weekly force notices and on the force's intranet.

The issues identified are in some cases shared through training run by the professional standards department (PSD) and anti-corruption unit (ACU) but there is no process for assessing them and incorporating them into future training or awareness raising. This is an area where the force could improve. The introduction of a central repository for lessons learned would allow easy access to the information.

There is no overall governance structure in place, and governance meetings between the PSD, the ACU and the force's appropriate authority have not been held recently. Although regular monthly meetings are held to discuss individual cases, and the head of the professional standards department and the appropriate authority hold a weekly one-to-one meeting, the lack of structure poses a considerable risk to the force.

The audit system used within the ACU should be improved further by introducing a new system that builds on the existing software. This would allow the ACU to continue carrying out several of its routine tasks more efficiently and effectively.

When the force was inspected in 2014, HMIC recommended that it should ensure that:

- it carried out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity;
- it communicated to all staff the requirements to comply with policies relating to notifiable associations, secondary employment, business interests, and gifts and hospitality; and
- it had the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour or corruption.

The force has responded positively to these recommendations.

The ACU is proactive, but has only part-time analytical support, which limits its capacity. The force monitors complaints, overtime, sickness and poor performance to identify unprofessional behaviour. Similarly, the PSD monitors the gifts and hospitality register, business interests and notifiable associations to identify any suggestion of corruption.

In addition, the force carries out random drug testing in the workforce (30 in a 12-month period) and the results are published. It also carries out intelligence-led drug testing, which has led to the resignation of an officer.

Intervening early to manage risks to integrity

Staff in the PSD and the ACU have promoted awareness of registering business interests, and this has resulted in more registrations and applications. The force does not routinely monitor activity if an application is refused, but does monitor activity reactively. A review of all business interests is now carried out annually so that the force can ensure that an officer or staff's business interests do not adversely affect their performance. The electronic database (Centurion) automatically prompts reviews with an individual's line manager.

The force publishes business interests by type and rank of officer or grade of staff member to maintain transparency with the public and reduce the demand from the media for freedom of information requests. The gifts and hospitality forms are published and well understood and used by the workforce, including the chief officer team. The gifts and hospitality register is reviewed annually by the chief officer group, presented to the force executive board, and published on the force website. Chief officers' expenses are also published externally. The professional standards department, together with the head of finance and the chief officer group's personal assistant, review procurement activity and expense claims to assess any integrity-related matters. However, the cross-checking of chief officers' diaries has ceased because all procurement activity is now conducted externally through the south-west regional procurement team.

The ACU can refer staff to occupational health and counselling support when needed. In addition, those who are the subject of allegations are allocated a welfare officer for the duration of the investigation. The force holds monthly sensitive information strategy group meetings (SISGs) comprising HR, the professional standards department, the ACU and the force's solicitor, to maintain and encourage information sharing between departments.

Looking for, reporting and assessing intelligence on potential corruption

The force has effective processes in place for the workforce to report potential corruption. There is an anonymous online reporting system direct to the ACU and the force subscribes to Crimestoppers, which enables anonymous reporting of potential corruption activity. The force provides support for whistleblowers and ensures that those who report matters are kept updated. To prevent individuals being compromised, the force restricts and monitors the sharing of information between HR and ACU computer systems.

Through vetting and the current ongoing re-vetting programme, notifiable associations are being checked to ensure compliance with the force's policy. Re-vetting can also be activated by an individual notifying the force of any change in circumstance. Vetting aftercare is available through an individual's line manager and is monitored by the vetting manager. This provides support to the staff member on issues such as debt counselling. Aftercare can be provided as a result of the initial vetting process, or renewal of vetting, or vetting in connection with a change in post or on promotion.

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

The Association of Chief Police Officers (ACPO) published *The Abuse of Police Powers to Perpetrate Sexual Violence*.¹⁸ This report states that 'the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public's confidence in individual officers and the service in general.' The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The *Code of Ethics*¹⁹ – which sets out the standards of professional behaviour expected of all policing professionals – explicitly states that they must 'not establish or pursue an improper sexual or emotional relationship with a person with whom [they] come into contact in the course of [their] work who may be vulnerable to an abuse of trust or power.'

The most recent national counter-corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.²⁰ HMIC's 2015 report, *Integrity matters*,²¹ identified police sexual

¹⁸ *The Abuse of Police Powers to Perpetrate Sexual Violence*, jointly published by IPCC and ACPO (now the National Police Chiefs' Council), September 2012. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF

¹⁹ *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, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

²⁰ Every three years, the National Counter Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

²¹ *Integrity Matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

misconduct as an area of great concern to the public. We share the public's disquiet and so we looked at this issue specifically as part of our 2016 inspection. Our work was given additional emphasis in May 2016 by a request from the Home Secretary that we should inspect forces' response to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

Recognising abuse of authority for sexual gain as serious corruption

The force recognises that officers or staff abusing their authority for sexual gain constitutes serious corruption and treats cases of abuse of this nature as a mandatory referral to the IPCC. The force has dealt with one case of an officer abusing authority for sexual gain that involved a victim of domestic abuse. After the conviction of the police constable in March 2015, the force sent out a force-wide communication entitled 'Maintaining professional boundaries and standards of behaviour' that clearly sets out its position on sexual or improper emotional relationships with any current or former victim, offender or witness. At the time, the force also issued a press release and made an appeal to the public for any more victims to come forward. The PSD has contributed to the initial crime investigators development programme (ICIDP) and given a presentation to newly promoted sergeants to raise their awareness. However, those we spoke with as part of this inspection were not aware of any bespoke training or specific documents on the subject on the force's intranet.

The force does not actively seek to identify officers and staff potentially abusing their powers for sexual gain, and it does not have a counter-corruption strategy to identify the greatest corruption threats to the force.

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

The force has not undertaken any focused activity to identify staff who may present a risk to vulnerable victims, and it does not proactively seek intelligence on potential abuse of authority for sexual gain from external sources. It does not routinely or proactively monitor its IT systems to look for suspicious patterns of behaviour, such as searching systems to identify vulnerable victims. It responds when presented with intelligence rather than carrying out preventative work to highlight the issue and prevent its occurrence.

Taking action to prevent abuse of authority for sexual gain

The force's understanding of the scale and source of the problem is limited because there is no proactive intelligence gathering or counter-corruption strategic threat assessment to identify risk. Reports of this nature are usually identified as part of an unrelated investigation, or through confidential reporting from colleagues or victims through an anonymous information system. The detective chief inspector in the PSD investigates appropriately the issues raised. The PSD and the ACU have provided

training to different groups within the organisation to set out expectations and enable supervisors and staff to identify warning signs of this kind of behaviour in other staff. Additionally the Code of Ethics is promoted internally, and this gives clear guidance on forming inappropriate relationships. Lessons learned from recent national cases have been shared internally within the professional standards department and at regional professional standards department meetings.

Building public trust

In the one case dealt with by the force in March 2015, a detailed press release was issued and an appeal made to the public for any more victims to come forward. However, we found no evidence of any specific initiatives to rebuild trust and reassure communities about sexual abuse by officers.

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

HMIC's 2014 literature review on police integrity and corruption emphasised the importance of collection and dissemination of information about misconduct to the public, on the basis that it shows police forces are taking the problem seriously, and detecting and punishing wrongdoing.²² This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

Working with the public

The force publishes outcomes of gross misconduct, misconduct and corruption cases on its website. The website provides details of misconduct hearings and informs the public as to how and where they can attend hearings. The force recognises the impact of high-profile misconduct on public trust and confidence. This is reflected in its media releases, which acknowledge the public's expectation of high standards and seek to reassure the public as to how seriously the force views and treats misconduct. In January 2016, the force released a list of wrongdoings by officers in an effort to be more open and transparent. Additionally, to reassure the public that misconduct is taken seriously, and is unacceptable, the head of professional standards has conducted local radio interviews and issued press releases after cases have been concluded.

²² *Literature Review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

The force's website, which is accessible to the public, holds information on gifts and hospitality received by officers and staff as well as by chief officers, although these are recorded separately. The published log of business interests covers all ranks of officer and grades of staff and is easy to access via a search of the website.

Working with the workforce

The force informs its employees of the outcomes of misconduct cases. Misconduct hearing outcomes are circulated via force bulletins to all staff. In addition, senior leaders' forums and leadership days have been used to define and emphasise to staff unacceptable standards of behaviour. However, while IPCC bulletins of lessons learned are circulated on the force intranet, there is no central repository for lessons learned to be stored and shared.

Details of officer misconduct and corruption cases are published on the intranet, but this is less frequent for cases involving police staff. In line with current conditions of service for police staff, only cases involving criminal behaviour are published. Lessons learned from misconduct cases are published in the force's newsletters. All gross misconduct hearings for officers are now conducted in public, and therefore reported in the public domain. A system managed by the PSD manager ensures that the College of Policing is informed of disapproved officers in a timely manner.

Those we spoke to during the inspection were able to recount details of misconduct cases involving issues such as the misuse of social media and exploitation of vulnerable victims. One report of inappropriate behaviour had been included as a specific case on a training day, highlighting to staff that the behaviour was unethical.

The force communicates misconduct outcomes to the workforce, including volunteers. This reinforces appropriate behaviours and improves understanding of the consequences of misconduct.

Summary of findings



Requires improvement

The force requires improvement in the way it ensures staff behave ethically and lawfully. It has well-developed processes for maintaining an ethical culture and complies with the national police vetting policy, which it does to a good standard.

The force clarifies and continues to reinforce acceptable and unacceptable standards of behaviour. For example, weekly communications from the chief constable include the force values and a link to the Code of Ethics.

The force identifies and monitors the risks to the organisation from its own staff, but could improve the way it audits systems for signs of suspicious behaviour. The force

was developing a counter-corruption strategy to provide a more structured framework for identifying and prioritising risk at the time of the inspection. However, the force does not have any specific process, other than its standard practices, to address the abuse of power for sexual gain.

There is no overall governance structure in place and no central co-ordination of lessons learned. Oversight meetings between the professional standards department, the anti-corruption unit and the force's appropriate authority have not been held recently. This poses a risk to the force.

Gross misconduct cases are publicised on the website, as are details of misconduct hearings involving officers, but cases involving police staff are not automatically publicised. The website also holds information on gifts and hospitality offered to officers, including chief officers, and staff.

Areas for improvement

- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
- The force should ensure that it has the capability to monitor all its computer systems to identify risks to the force's integrity.
- The force should improve how it identifies and understands issues for organisational learning.
- The force should improve the governance structures between the chief officer team and the professional standards department and the anti-corruption unit.

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 behaviours.²³ As such, this concept of 'organisational justice' and its potential impact on 'procedural justice' forms an important part of HMIC's assessment of police legitimacy. As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational 'fairness' is reflected through the way individual performance is managed, and how 'organisational respect' is reflected through how forces provide for the wellbeing of their workforces, particularly through preventative and early action.

How well does the force identify and act to improve the workforce's perceptions of fair and respectful treatment?

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.²⁴ On this basis, HMIC assessed how well the force engages with its staff to identify and understand the issues that affect them, and how well it acts on these issues and demonstrates it has done so.

²³ *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: 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

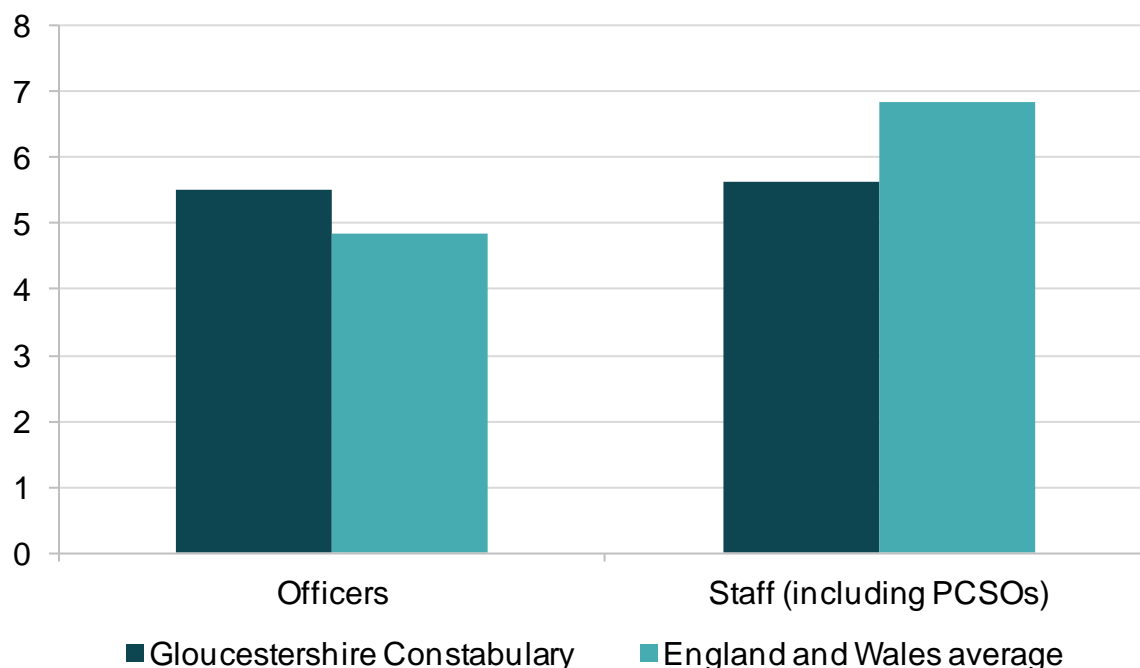
²⁴ *Fair Cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf

Identifying and understanding the issues

Grievances are concerns, problems or complaints raised formally to employers by officers or staff. Data on numbers and types of grievances provide forces with a useful source of information about the sorts of issues that staff and officers are concerned about.

Figure 3: Number of grievances raised by officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) that Gloucestershire Constabulary finalised compared with England and Wales, in the 12 months to 31 March 2016



Source: HMIC Legitimacy data collection

For further information about the data in figure 3 please see annex A

In the 12 months to 31 March 2016, Gloucestershire Constabulary finalised 5.5 formal grievances raised by officers per 1,000 officers, which was broadly in line with the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 5.6 formal grievances raised by staff per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

The force has seen a considerable increase in fairness at work issues being registered in the past 12 months. The force understands the issues raised. Most of them relate to changes to the promotion process and applications for career breaks. To address these issues, the force has introduced specific sessions to prepare officers for the recently introduced promotion assessment centres. The decision to introduce assessment centres was made partly because most officers and staff perceived the previous traditional system for recruitment as unfair. However, these assessment centres have not been popular with everyone. The changes in the policing model introduced in July 2015 recognised the difficulties of policing with

fewer staff. A consistent message explaining changes in the policy on career breaks and flexible working requests was communicated to the workforce. Applicants are given an opportunity to appeal against decisions. The chief constable reviews such appeals to ensure that decisions are fair and the business needs of the force met.

The force monitors a wide range of data and uses a variety of methods to identify the areas that have an impact on the workforce's perceptions of fair and respectful treatment. These include staff surveys and consultation exercises as part of the force change programme. To gain the views of staff and officers, the force undertakes both annual and quarterly staff surveys, known as 'pulse' surveys. This programme is well established, and is now in its third year. The force informed us that it has a relatively high return rate of 35 percent. One of the measures included in the survey is procedural justice, which measures perceptions of fairness. This was an area identified for improvement during the two previous surveys.

An overall summary, rather than the full results of the surveys, is published on the force's intranet, as well as fed back to senior leaders and summarised in a video to communicate the overall findings or to explain what actions are being taken. However, those we spoke with during this inspection perceived that there were still problems with communicating the survey results, the lessons learned by the organisation and the action taken as a result of the surveys.

In addition to staff surveys, the force uses a variety of methods to collect feedback from staff. These include senior leaders' forums and leadership days. A series of specific sessions also took place during the launch of the new operating model in July 2015, and feedback from these events is being used to inform the current review of the change programme and assess its effectiveness.

Staff associations reported that there were a variety of ways in which staff could raise issues, either through HR or the staff associations, and that the force was perceived to be prepared to listen to issues raised by staff. For example, in January 2015, the Police Federation raised concerns about the timeliness of an ongoing promotion exercise for chief inspectors, and received feedback from inspectors across the force.

The Federation shared this with the strategic head of corporate services and, as a result, a full rationale for elements of executive decision-making, which had been unclear, was developed and communicated to the workforce.

The force has a force-wide online forum where officers and staff can voice opinions. Recently, however, this forum has had its anonymous section closed and a three-page login page has been added, detailing the need for users to agree and acknowledge the terms and conditions on each occasion they log in. This has resulted in a considerably reduced number of posts. Those we spoke with during the inspection reported that the forum had been greatly diluted as a result of the live chat facility being removed. Previously, they had found the forum a transparent, vibrant

and effective means to raise and discuss issues on a force-wide basis, and one that enabled the organisation to assess the level of workforce concern about specific themes.

Staff representative groups attend a variety of strategic meetings within the force and confirm a good relationship with the chief officer team. The strategic head of corporate services meets monthly with the Police Federation and separately with Unison (more often if requested), and receives feedback on issues of concern for the workforce. However, some representatives we spoke with during the inspection expressed concern regarding their overall level of influence over force decisions and development, and about the visibility of some members of the chief officer team.

Making improvements

The force resource deployment meeting (RDM) is the decision-making forum for postings, career breaks, alternative working requests and other resourcing decisions. Several of those we spoke with during the inspection stated that there was a perception among the workforce that some of the decisions made at the RDM were not transparent or fair. To improve perceptions of fairness (as well as actual fairness), the RDM has introduced audio recordings of meetings. The panel considers consistency with previous decisions and states the rationale for its decisions in every case. The rationale is not automatically made available to staff but the audio recording can be accessed in the event of challenge. Additionally, in response to a series of concerns about the fairness of refusals to agree career breaks, representatives from the staff associations have been invited to become observers at the meeting. Although these processes are in place, fair treatment of staff continues to emerge as a concern in two staff surveys, and the 'fairness at work' complaints have increased. This suggests that the force needs to do more to be open and transparent in the decision-making process, allowing the workforce clearly to see that the force's policies are being followed and that there is consistency in its decision making.

Demonstrating effectiveness

The force operates a 'fairness at work' process to manage workforce grievances. Those we spoke with generally had confidence in fairness at work and grievance policies. However, the force acknowledges that confidence in the process has been eroded and that not all members of the workforce perceive the process to be fair and effective. There was a perception that the procedure was used inappropriately, specifically in relation to the promotion process and applications for flexible working and career breaks. This has implications for workforce confidence and the force's ability to deal with perceived unfairness.

The executive board considered both fairness and perceptions of fairness in decision making in the context of the assessment centres in recent promotion exercises (to inspector and chief inspector). To address perceptions of procedural unfairness – for

example, complaints about a candidate being allowed to refer to notes during an interview – the force decided to re-interview five candidates for promotion. However, this had not taken place at the time of our inspection.

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. Last year our inspection was concerned with what efforts forces were making to consider, and provide for, the wellbeing needs of their workforce. This year we looked at the progress the force had made since the last inspection, with a particular focus on preventative activity to encourage wellbeing.

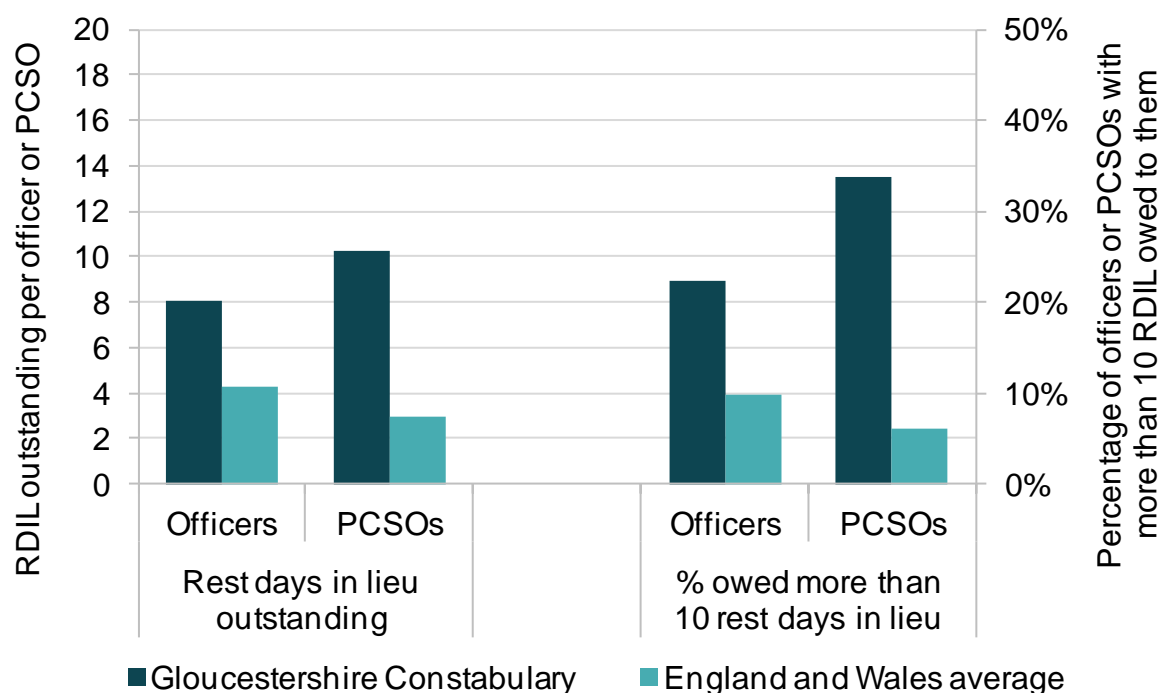
Understanding and valuing the benefits

The wellbeing of staff is a key element of the force's 'people' strategic objective within the strategic business plan and has been a topic of recent leadership days. The force has a wellbeing board chaired by the chief constable. This is an informal, discursive forum that considers and explores issues affecting staff. Board membership is diverse and includes officers and staff from different backgrounds, ranks and grades. The board does not make decisions; it reports to the people and resource deployment group, which manages employee wellbeing, occupational health, sickness and absence, and health and safety.

Identifying and understanding the workforce's wellbeing needs

Rest days in lieu (RDIL) are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Long working hours can have a detrimental impact on the health and wellbeing of the workforce, so it serves as a useful point of comparison for assessing the extent to which the force is managing the wellbeing of its workforce. Analyses of the numbers of RDIL accrued, but not yet taken, can be useful tools for forces to identify and understand potential wellbeing concerns for individuals and teams.

Figure 4: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them in Gloucestershire Constabulary compared with England and Wales, as at 31 March 2016



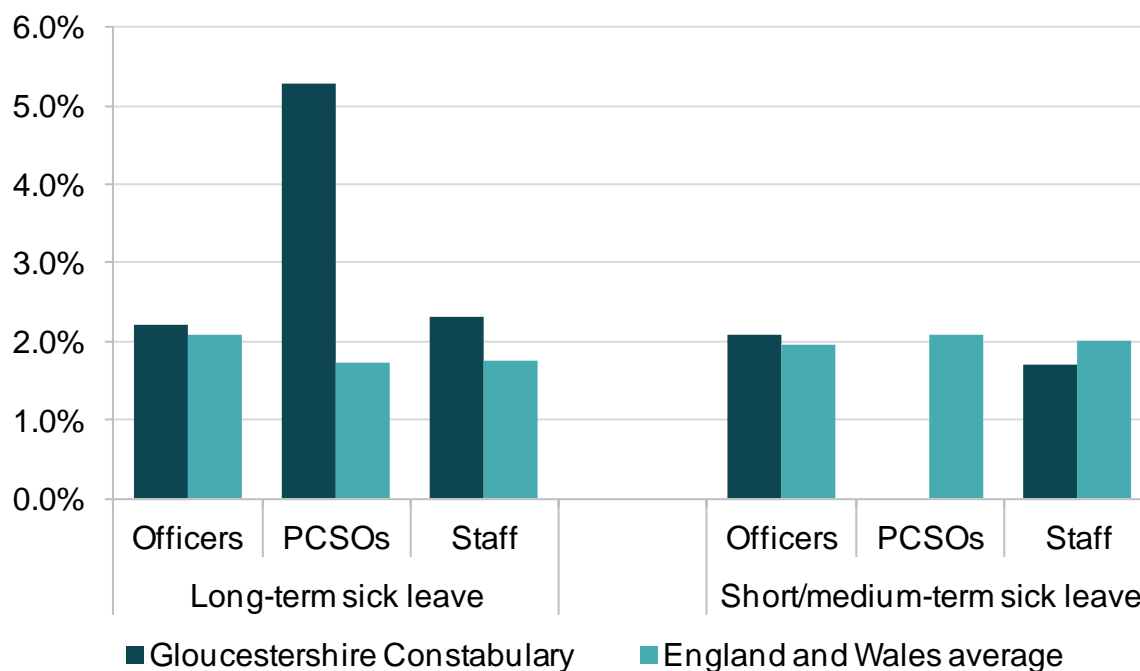
Source: HMIC Legitimacy data collection

Note: For some police forces data about the number of rest days in lieu outstanding are estimated from data on hours owed. For further information about the data in figure 4 please see annex A.

As at 31 March 2016, there were 8.0 rest days in lieu outstanding per officer in Gloucestershire Constabulary, which was higher than the England and Wales average of 4.2 days per officer. On the same date, there were 10.3 rest days in lieu outstanding per PCSO in the force, which was higher than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 22.4 percent of officers in Gloucestershire Constabulary had more than 10 rest days in lieu owed to them, which was higher than the England and Wales average of 9.8 percent. As at 31 March 2016, 33.9 percent of PCSOs in the force had more than 10 rest days in lieu owed to them, the England and Wales average was 6.0 percent of PCSOs. The data on PCSOs did not allow a comparison with the average.

Sickness data can provide a useful point of comparison for assessing the wellbeing of police workforces. Analysis of this data can also help forces to identify and understand the nature and causes of sickness at individual and organisational levels, and inform targeted activity to prevent and manage sickness.

Figure 5: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in Gloucestershire Constabulary compared with England and Wales, as at 31 March 2016



Source: Home Office Annual Data Requirement

Note: Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. For further information about the data in figure 5 please see annex A.

Figure 5 provides data on the proportion of officers, PCSOs and staff who were absent due to sickness on 31 March 2016.

- 2.2 percent of officers were on long-term sick leave, which is broadly in line with the England and Wales average of 2.1 percent.
- 2.1 percent of officers were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.0 percent.
- 5.3 percent of PCSOs were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.
- 0.0 percent of PCSOs were on short or medium-term sick leave, which is lower than the England and Wales average of 2.1 percent.
- 2.3 percent of staff were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.
- 1.7 percent of staff were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.0 percent.

Taking preventative and early action to improve workforce wellbeing

The wellbeing board discusses issues arising from staff involvement forums, staff surveys, Police Federation wellbeing workshops and occupational health updates, including support for officers involved in dangerous or traumatic incidents. It is the force's intention to involve people from across the organisation in developing solutions to the issues raised. The board will commission other parts of the organisation to work on issues, and members of the board may also take a lead role. For example, as a result of concerns raised by an officer who was assaulted while on duty, the incident was discussed at executive board level and the force developed a seven-point plan that takes supervisors through what is expected of them and the support that staff should expect following an assault on duty.

There are a range of options for welfare support available to officers and staff, and line managers have a good understanding of the options available. These include services provided through the occupational health department to support those experiencing stress and anxiety. One example is the cognitive behaviour therapy provided by an external company. The occupational health department also has a dedicated mental health nurse.

Education and health campaigns are used to promote wellbeing, with high-visibility displays at police headquarters. However, these promotions are not always seen by officers working in more remote locations. There is an occupational health intranet site that includes advice and guidance and is easily accessible. Officers cannot self-refer to the occupational health service; applications are made through their line manager, who is also responsible for managing outstanding records of rest days in lieu, time off in lieu, and annual leave days.

The force takes early action to improve the wellbeing of its workforce. There is a regular reporting process which provides an opportunity to identify issues early. Over the past year, the force has improved its monitoring of sickness absence and leavers' data to identify the greatest risks to employee wellbeing and triangulated this information with feedback from the Police Federation and Unison. Managers are informed by an automated link when a member of staff reaches any of the sickness thresholds. The attendance management policy specifies the time periods for managers' contact with absent staff and trigger points for referral to the occupational health services. Reports of any stress or mental health-related illness are immediately referred to occupational health. The force also has a systematic approach to prioritising high-risk jobs, and it is in the process of reviewing what constitutes a high-risk job, to ensure that officers and staff receive the appropriate support while performing their duties.

Those we spoke with during the inspection stated that the force is effective at identifying workforce wellbeing needs and responding to them. Several people reported that they had received support following their attendance at traumatic incidents, including the aftermath of a recent incident in a club at Gloucester where

the victim required cardiopulmonary resuscitation. There was a full debrief after the incident and trauma risk incident management (TRIM) officers were available to assist. Another officer was able to sit down with his supervisors and discuss that this had been the third incident in a short period when he had felt the effects of trauma. As a result, he was offered immediate support from occupational health and temporary redeployment to recuperative duties. However, we found that the designated TRIM process is not always available or implemented consistently across the force.

Officers of the Special Force spoken to as part of this inspection stated that the force is very supportive to officers subject to complaints. Support is available via occupational health and the Federation. In addition, a special chief inspector has been trained to manage the local resolution process. He is notified of any professional standards department investigations involving a special constable so that he can provide early support.

The potential adoption of the Public Health England Workplace Wellbeing Charter was discussed at the people and resource deployment group meeting in February 2016. The force made the decision not to become a signatory to the scheme because it would neither add benefits to the organisation nor justify the cost.

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

College of Policing research on organisational justice suggests that lack of promotion opportunities and not dealing with poor performance may adversely affect workforce perceptions of fairness, which in turn may lead to negative attitudes and behaviours in the workplace.²⁵ HMIC assessed how fairly and effectively the force manages the individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.²⁶

²⁵ *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

²⁶ College of Policing guidance on the police PDR process is available at:

www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

The performance assessment process

The force's performance assessment process for officers and staff is fair but could be more effective. An internal assessment of the current PDR process identified that it is not used consistently for staff development, or at all as part of the promotion process. The force is working to change the way in which development needs are included, and some early work has already been undertaken in developing the framework of the leadership programme.

The results of performance assessment

The force uses performance improvement plans (PIPs) to address aspects of poor performance, and an amended HR structure ensures that HR consultants can give advice to managers in dealing with issues of poor performance.

All staff and officers have a PDR and objectives are set. However, the final product is not used to best effect. It was generally felt by those we spoke with during the inspection that the PDR is not consistently valued, is under-used and added no value to the development of skills or competences.

Summary of findings



Requires improvement

The force requires improvement in respect of fair and respectful treatment of its workforce. While it undertakes both annual and quarterly staff surveys, staff we spoke to remain unclear of the lessons learned and what actions have been taken as a result.

The anonymous section of the force-wide online staff forum on which staff can voice opinions has been closed and the live chat facility stopped, resulting in a significant drop-off in posts and concerns expressed by some of the workforce regarding transparency.

The force has a 'fairness at work' process to manage grievances and has seen a considerable increase in such issues being registered in the past 12 months. While, in general, those we spoke to had confidence in the process, the force acknowledges that not all the workforce perceive it as being fair and effective.

The force has a wellbeing board, and wellbeing is a key element of the force's 'people' objective within their strategic business plan. There is a regular reporting process, which provides an opportunity to identify issues early, and a range of options for welfare support, which managers understand well.

The force's performance assessment process for officers and staff could be more effective. An internal force assessment identified that it is not used consistently for staff development or at all as part of the promotion process, and it is regarded as adding little value in terms of promotion, appraisal or development.

Areas for improvement

- The force should improve how it manages individual performance.

Next steps

HMIC assesses progress on causes of concern and areas for improvement identified within its reports in a number of ways. We receive updates through our regular conversations with forces, re-assess as part of our annual PEEL programme, and, in the most serious cases, revisit forces.

HMIC highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and also leadership. These reports identify those issues 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 can be made at a national level.

Findings and judgments from this year's PEEL legitimacy inspection will be used to direct the design of the next cycle of PEEL legitimacy assessments. The specific areas for assessment are yet to be confirmed, based on further consultation, but we will continue to assess procedural and organisational justice aspects of police legitimacy to ensure our findings are comparable year on year.

Annex A – About the data

Please note the following for the data presented throughout the report.

The source of the data is presented with each figure in the report, and is listed in more detail in this annex. For the source of force in numbers data, please see the relevant section below.

Methodology

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

Comparisons with England and Wales average figures

For some data sets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. To calculate this, the difference to the mean average, as a proportion, is calculated 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.

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.

Where we have referred to the England and Wales average, this is the rate or proportion calculated from the England and Wales totals.

Population

For all uses of population as a denominator, unless otherwise noted, we use the ONS mid-2015 population estimates.

Force in numbers

Workforce figures (based on full-time equivalents) for 31 March 2016

These data are obtained from the Home Office annual data return 502. The data are available from the Home Office's published Police workforce England and Wales statistics, www.gov.uk/government/collections/police-workforce-england-and-wales, or the Home Office police workforce open data tables, www.gov.uk/government/statistics/police-workforce-open-data-tables. Figures may have been updated since the publication.

Projections for March 2020 are budget-based projections and therefore are likely to take into account a vacancy rate depending on a force's planning strategy. In some instances an increase in budgeted posts may not actually indicate the force is planning to increase its workforce. In other cases, forces may be planning to reduce their workforce but have a current high vacancy rate which masks this change.

Police staff includes section 38 designated officers (investigation, detention and escort).

Data from the Office for National Statistics 2011 Census were used for the number and proportion of black, Asian and minority ethnic people within each force area. While the numbers may have since changed, more recent figures are based only on estimates from surveys or projections.

Figures throughout the report

Figure 1: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) compared with England and Wales, in the 12 months to 31 March 2016

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as "an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force". A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.²⁷

Data used in figure 1 are data extracted from the Centurion case recording and management system for Police Professional Standards data. We were able to collect the majority of this data through an automated database query, written for us by the creators of the software, Centurion (FIS Ltd). Forces ran this query on their systems

²⁷ *Guidance on the Recording of Complaints under the Police Reform Act 2002*, Independent Police Complaints Commission. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf

and returned the outputs to us. This system is used in 41 of the 43 forces inspected. In order to collect the appropriate data from the two forces not using Centurion (Greater Manchester Police and Lancashire Force), they were provided with a bespoke data collection template designed to correspond to information extracted from the Centurion database.

Although the IPCC categories used to record the type of public complaint and the accompanying guidance are the same in all police forces, differences in the way they are used still may occur. For example, one force may classify a case in one category while another force would classify the same case in a different category. This means that data on the types of public complaint should be treated with caution.

Figure 2: Percentage of victims satisfied with overall treatment compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016

Forces are required by the Home Office to conduct satisfaction surveys with specific victim groups. Victim satisfaction surveys are structured around core questions exploring satisfaction with police responses across four stages of interactions: initial contact, actions, follow-up, treatment plus the whole experience. The data in figure 2 use the results to the question on treatment, which specifically asks "Are you satisfied, dissatisfied or neither, with the way you were treated by the police officer and staff who dealt with you?"

When comparing with the England and Wales average, the standard methodology described above has been used. When testing whether the change in percentage of respondents who were satisfied between the 12 months to 31 March 2015 and the 12 months to 31 March 2016 is statistically significant, a chi square hypothesis test for independence has been applied.

Figure 3: Number of grievances raised by officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) finalised compared with England and Wales, in the 12 months to 31 March 2016

The data refer to those grievances that were subject to a formal process (not including issues informally resolved with a line manager). Some of the grievances finalised in this period may have been raised in a previous year. Finalised refers to grievances where a resolution has been reached, after any appeals have been completed. Differences between forces in the number of finalised grievances may be due to different handling and recording policies. Data used in figure 3 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

Figure 4: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them compared with England and Wales, as at 31 March 2016

Rest days in lieu are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Data used in figure 4 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

Figure 5: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave compared with England and Wales, as at 31 March 2016

Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. Data used in figure 5 were obtained from Home Office annual data returns 501 and 551. Data on long-term absences can be found in the Home Office police workforce open data tables:

www.gov.uk/government/statistics/police-workforce-open-data-tables