



Promoting improvements  
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# PEEL: Police legitimacy 2016

An inspection of Gwent Police



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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.<sup>1</sup> 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.<sup>2</sup> 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.

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<sup>1</sup> *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](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>2</sup> *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](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/](http://www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/)). This report sets out our findings for Gwent Police.

Reports on Gwent Police's efficiency and leadership inspections are available on the HMIC website ([www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/gwent/](http://www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/gwent/)). Our reports on police effectiveness will be published in early 2017.

## Force in numbers

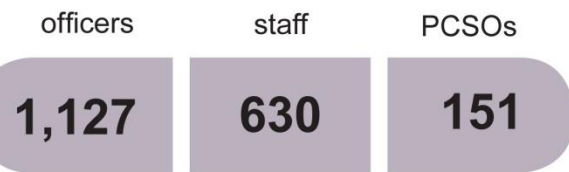


### Workforce

Total workforce as of 31 March 2016

**1,908**

Total workforce breakdown as of 31 March 2016



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

**1.6%**



Percentage of BAME in local population, 2011 Census

**3.9%**



### Gender diversity

Percentage of females in overall workforce 31 March 2016

**43%**

England and Wales population, 2011 Census

**51%**

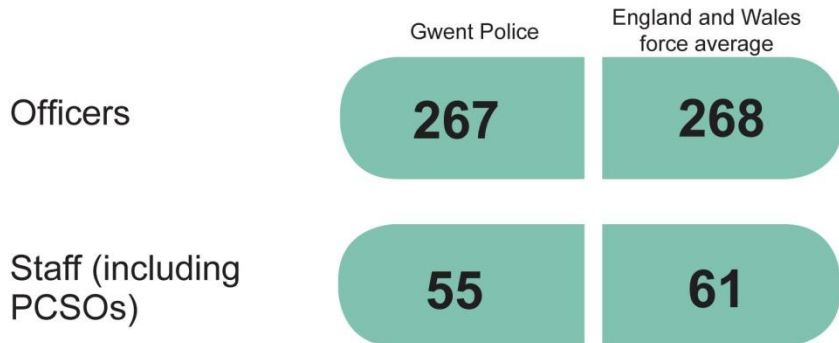
Percentage of females by role 31 March 2016





## Public complaints

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



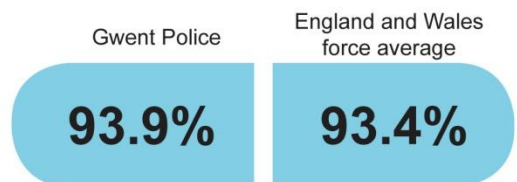
## Grievances

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



## Victim satisfaction

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



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 judgment<sup>3</sup>



**Good**

Gwent Police has been assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime. Our findings this year are consistent with last year's findings, in which we judged the force to be good in respect of the legitimacy.

The force has clear values which are understood by the workforce and it seeks feedback from the public as to how they are treated. Gwent Police insists its workforce acts with integrity and it is good at identifying corruption risks. The force seeks the views of its staff and it has well-established health and wellbeing procedures.

### Overall summary

Gwent Police has a clear and well-articulated 'vision and values', and the Code of Ethics is familiar to staff across the organisation. It promotes the Code of Ethics by using ethical dilemmas to prompt discussion and debate.

The force is good at acting on learning. It has a management board to identify and manage learning from a range of sources. Governance of processes and information relating to internal and public legitimacy is good, and the force has clear plans in place to ensure its approach to legitimacy is properly coordinated.

The force identifies threats to the organisation effectively; for example, Operation Erasure identifies staff members who may be a risk through predatory sexual behaviour.

The force has a well-established and effective health and wellbeing strategy, which is supported by a range of practical measures to promote health and wellbeing. The workforce recognises its value. Additionally, the force respects the views of its staff and acts appropriately and legitimately to deal with concerns or issues raised by the workforce. The force actively encourages innovation. Staff contributions to organisational improvement, through the staff suggestion scheme, are welcomed and assessed and progress made on them in a way that is appreciated positively by the workforce.

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<sup>3</sup> HMIC judgments are: outstanding, good, requires improvement and inadequate.



## **Recommendations**

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

### **Areas for improvement**

- The force should ensure it complies with all aspects of the current national guidelines for vetting.
- 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.<sup>4</sup>

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.<sup>5</sup> 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

Gwent Police fully recognises the importance of treating the public it serves with fairness and respect and has made it a priority in its vision and values, which are clear and well established. The force’s overall vision of protecting and reassuring the public and making people safe and feel safe is built around three central pillars: being an employer of choice, engaging with communities and delivering a service that works.

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<sup>4</sup> *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](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>5</sup> *Ibid.*

The workforce understands the importance of engaging with the public it serves in a fair and respectful manner. The chief officer team continually reinforces this message by setting clear values and standards, using a range of communication methods. The Code of Ethics is well known across the force. The force has recently introduced discussions about ethical dilemmas, which are circulated across the force along with information on the outcomes of misconduct cases, to help promote an ethical culture.

## **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**

Gwent Police involves the public and local communities using a range of methods. Local policing teams regularly conduct surveys with members of the public through a project called Your Voice. The force uses the information gathered to shape the policing priorities for that particular area. In addition, the force uses social media to support involvement with the community. The office of the police and crime commissioner (OPCC) also undertakes work to support involvement with the community.

The force's website has a tool for the public to provide feedback to Gwent Police called Rate our Service. This gives people the opportunity to express praise, dissatisfaction or to raise a complaint about the service. In future, the OPCC will have greater responsibility for resolving cases where people have expressed a low level of dissatisfaction.

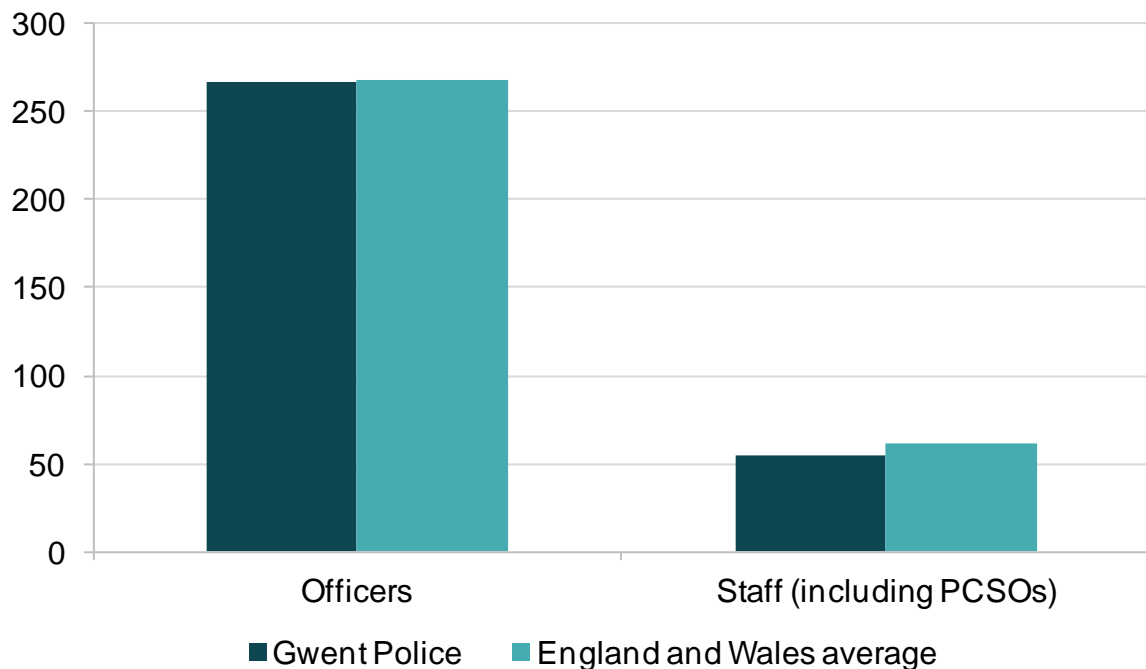
The force meets with an independent advisory group every month to explore ways to increase public trust and confidence. The independent advisory group scrutinises areas of policing that affect those people or communities with less trust and confidence in the police, or those people or communities who are less likely to complain or take part in traditional forms of engagement, such as the use of stop and search powers with young people. Specific work has been done in this area with young people from black and minority ethnic backgrounds and, in seeking to improve access to policing services across all its community, the force has conducted educational meetings with Eastern European groups. These meetings aim to improve the understanding of the role of the police and set out the rights of the public in relation to the police.

The force also has a public confidence board, which replaced the service that works group. This is a strategic management board to oversee work on improving public confidence. It has overarching responsibility for understanding how policing services affect the public, with particular reference to the needs of marginalised groups with less trust and confidence in the police.

### 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 Gwent Police 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**

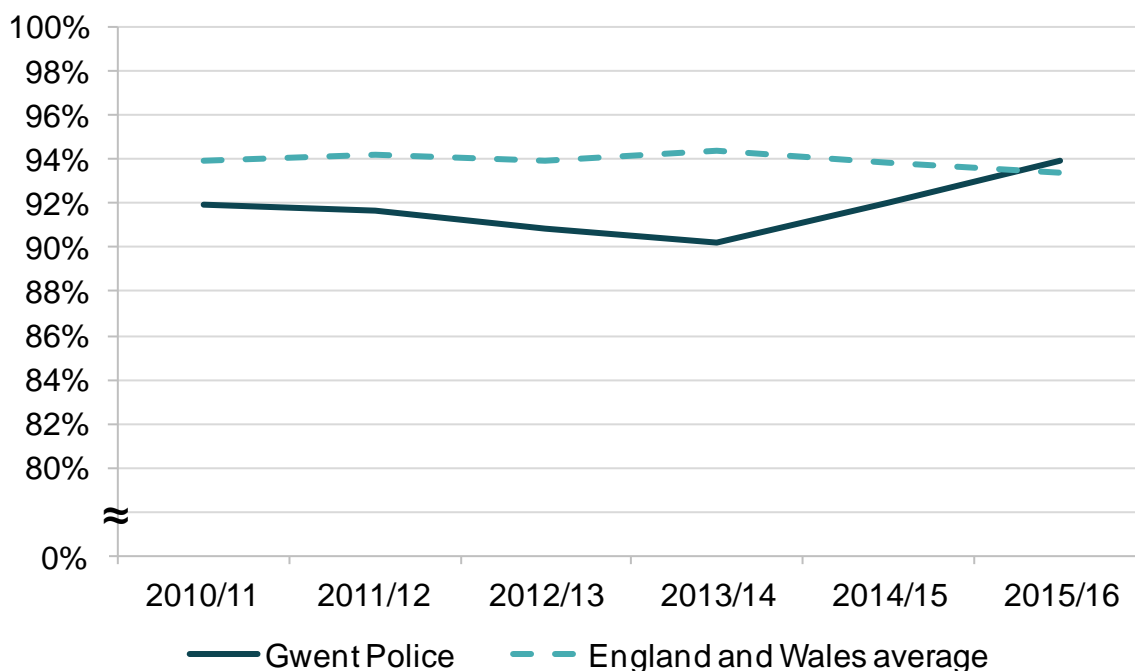
In the 12 months to 31 March 2016, Gwent Police recorded 267 public complaint cases per 1,000 officers, which was broadly in line with the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 55 public complaint cases per 1,000 staff (including PCSOs), which 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 Gwent Police are 'other neglect or failure in duty' and

‘incivility, impoliteness and intolerance’.<sup>6</sup> It is important to note, however, an issue identified during our 2014 inspection on police integrity and corruption;<sup>7</sup> 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.

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.

**Figure 2: Percentage of victims satisfied with overall treatment by Gwent Police 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, 93.9 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Gwent Police, which was broadly in line with the

<sup>6</sup> Independent Police Complaints Commission data is available at: [www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data](http://www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data)

<sup>7</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

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.

Gwent Police undertakes a range of work to understand the issues that have the greatest impact on the public. It has held workshops with young people (aged between 11 and 21) to understand their views on the use of powers of stop and search and has started a ride-along scheme to let members of the community observe the police at work. The force regularly contacts victims of crime as part of its CARES programme to make sure its service is provided in a professional, consistent and considerate manner.

The force identifies and reviews trends from public complaints and expressions of dissatisfaction at a strategic level and has two dedicated sergeants to help locally resolve public complaints. The force also works with the independent custody visitor scheme, which provides feedback about detainees held in custody. Independent custody visitors conduct unannounced visits to custody suites. However, the force does not proactively review footage recorded via body-worn video cameras.

## **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**

Gwent Police has effective governance structures and uses practical methods to ensure that lessons learnt and feedback from the public are recorded, considered and acted on. The force's public confidence board considers feedback from a range of sources and monitors action taken in order to improve service provision and involvement with the public.

The deputy chief constable chairs a tracker meeting that collates and identifies learning from the IPCC and other sources. This forum develops actions to be considered and addressed, which are then publicised across the organisation.

The professional standards department identifies learning from public complaints and misconduct investigations and publishes its findings on the force intranet. The force uses training sessions to identify learning and good practice to ensure the service is promoted and provided in a consistent manner.

## Demonstrating effectiveness

Gwent Police works with the public using different channels of communication. The force seeks feedback by using social media, established community meetings and involvement, the force internet and monthly meetings with the independent advisory group. The force has also organised conferences on hate crime as another way to explore issues that affect how it serves the public. It oversees public involvement and feedback at a strategic level through its public confidence board.

The force also works with specific parts of the community to seek and provide feedback, for example using workshops with young people to understand the effect of stop and search.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,<sup>8</sup> the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.<sup>9</sup> 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 inspection<sup>10</sup> considered the extent to which the force was complying with the scheme and found that it did not comply with all features of the scheme. In autumn 2016, HMIC will re-assess the force's compliance with those features of the scheme that it was not complying with in 2015.

As part of the BUSS scheme, Gwent Police operates a ride-along scheme to raise awareness of the force's work, improve its involvement with groups that have less trust and confidence in the police and increase public trust and confidence. This allows public participants to observe stop and search encounters and also gives them an opportunity to provide the force with direct and immediate feedback.

The force's professional standards department communicates with members of the public and provides details of the outcome of public complaints. It also has two sergeants in the force control room dedicated to giving direct and timely responses to the public in order to address expressions of dissatisfaction.

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<sup>8</sup> *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/](http://www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/)

<sup>9</sup> 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](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf)

<sup>10</sup> *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/)

## Summary of findings



**Good**

Gwent Police fully recognises the importance of treating the public it serves with fairness and respect and has made it a priority in its vision and values, which are clear and well articulated. The Code of Ethics is familiar to staff across the organisation. The force promotes the Code of Ethics by using ethical dilemmas to prompt discussion and debate.

The force regularly seeks feedback from the public through its Your Voice scheme and its web tool Rate our Service. It meets the independent advisory group every month to explore ways to improve public trust and confidence.

The force is good at acting on learning and has a management board that identifies and manages learning from a range of sources.



## 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.<sup>11</sup> 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.<sup>12</sup>

## 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.<sup>13</sup> 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.

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<sup>11</sup> *Integrity matters*, HMIC, January 2015. Available from:  
[www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

<sup>12</sup> *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](http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf)

<sup>13</sup> *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](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](http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf) and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at:  
[www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## **Initial vetting**

Gwent Police vets applicants to the force, following current national guidelines. Recruitment vetting for police officers, members of police staff, volunteers and contractors is conducted by the force vetting team, which is part of the professional standards department. Some posts involve a greater level of risk to the force and require a higher level of scrutiny and vetting (management vetting), but because of lack of capacity in the vetting team not all people in these roles have been vetted to the appropriate level (40 percent still need vetting to the higher level). The force has a schedule of re-vetting all staff in accordance with the assessed level of risk for their role: the frequency of re-vetting varies according to the level of risk. At present, 60 percent of staff are overdue for re-vetting, but the force is aware of this and is prioritising those whose posts are assessed as carrying higher levels of risk.

The vetting team and the anti-corruption unit have a close working relationship and share information well, making people aware of when their vetting needs to be reviewed. 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**

Gwent Police is effective in how it makes sure its workforce understands acceptable and unacceptable behaviour and in creating an ethical culture. All new staff receive information on the force's expected standards and the Code of Ethics. An ethical culture is well established across the force, and the force recognises that it is an important aspect of growing professionalism across the police service. The force maintains and promotes an ethical culture across the organisation, for example by using screen savers to endorse the Code of Ethics and by regular discussions on ethical dilemmas.

The chief officer team clearly sets out the standards it expects across the force, with regular blog entries by the chief constable providing a clear message. The deputy chief constable also holds meetings with staff to highlight appropriate standards of behaviour and threats to the integrity of the organisation. The force has held workforce briefings to provide learning from recent cases in which police officers have abused their position for sexual gain. The force takes such cases seriously and understands their impact on public confidence. The force's professional standards department provides regular workforce updates on the outcome of misconduct investigations.

The force has procedures in place relating to the workforce declaring their business interests, notifiable associations<sup>14</sup> and gifts and gratuities. This helps the workforce across the organisation to understand the importance of integrity and ethical behaviour. Good progress has been made in satisfying recommendations from HMIC's 2014 police integrity and corruption inspection, with all actions arising from these recommendations having been completed.

## **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.<sup>15</sup> 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**

Gwent Police has assessed the internal threats to the force's integrity and has set them out in an anti-corruption control strategy. This strategy details how misuse of force systems and improper disclosure of information are the current main threats to the organisation from a corruption perspective. The anti-corruption unit collects data that are then fed into the national strategic threat assessment.

The force has clear policies with regard to declaration of business interests, notifiable associations and gifts and gratuities, which are overseen by the head of the professional standards department. When business interests are refused, the force monitors for compliance, and if concerns are raised about an individual's

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<sup>14</sup> A notifiable association policy is designed to identify those individuals who could pose a risk to the integrity of an individual employee or the force itself. It requires the officer or staff member to report such associations, which then allows a full evaluation of the risk posed to both the individual and the force to be undertaken.

<sup>15</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

sickness levels their business interests are reviewed. The force does not routinely monitor compliance with notifiable associations, and has some concern that the workforce does not thoroughly understand notifiable association reporting despite publicity about the scheme.

The anti-corruption unit monitors the use of force systems on a regular basis, and this forms part of a continuing operation to ensure staff are not abusing their position for sexual gain or making inappropriate contact with vulnerable victims. It also monitors overtime claims, sickness levels, internet use and procurement, which are overseen by the head of professional standards and other main stakeholders at a risk management board. The force monitors its systems using digital monitoring software.

The force vetting team is co-located with the anti-corruption unit and there is good information sharing. However, the vetting team is aware that it does not currently have sufficient capacity to conduct re-vetting effectively.

### **Intervening early to manage risks to integrity**

Gwent Police has appropriate structures in place to manage individual and organisational risks. The risk management and joint tasking board considers risks from a range of sources, including corruption, data protection, procurements and public complaints. This forum seeks to compile information to identify emerging themes and threats. The head of professional standards also meets representatives from the IPCC to consider learning.

The deputy chief constable chairs a complaints tracker meeting, which identifies and collects learning from the IPCC and other sources. This forum develops actions to address the lessons learnt, which are subsequently considered and publicised across the organisation.

The professional standards department identifies learning from public complaints and misconduct investigations and publishes its findings on the force's intranet. The force also uses force-wide training to identify learning and good practice to ensure the service is promoted and provided in a consistent manner. The force has shared recent learning with staff after a misconduct investigation involving an officer who had used his position for sexual gain.

### **Looking for, reporting and assessing intelligence on potential corruption**

Gwent Police's anti-corruption unit is part of the professional standards department. Although the unit is relatively small and mainly reacts to intelligence gathered, it does undertake work to identify threats to the integrity of the organisation. It monitors the use of force systems on a regular basis, which is part of a continuing operation to ensure that staff are not abusing their positions for sexual gain or making inappropriate contact with vulnerable victims. It also monitors overtime claims, sickness levels, internet use and procurement.

The force gathers intelligence on potential corruption from several sources, including material from the source-handling unit and anonymous reporting lines. However, the majority of intelligence is gathered through open reporting, which the force sees as positive and a good barometer of the ethical culture across the organisation. The anti-corruption unit assesses and develops intelligence and has access to covert assets within force and across the region if required. The unit's ability to research intelligence in the future will become more limited because of a reduction in resources within the team. The force has an anonymous phone line, safecall, for staff to use to report concerns about the ethical behaviour or corruption of colleagues.

The force undertakes limited random drug testing for staff to deter substance misuse and this is supported by intelligence-led testing when required. The force has also developed a system to identify and monitor any member of the organisation who might be a high risk for using their position for sexual gain. An officer has recently been dismissed from the organisation after being identified through the anti-corruption unit's methods as displaying predatory sexual behaviour.

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

In 2012 the Independent Police Complaints Commission (IPCC) and Association of Chief Police Officers (ACPO) published *The abuse of police powers to perpetrate sexual violence*.<sup>16</sup> 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<sup>17</sup> – 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”.

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<sup>16</sup> *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](http://www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF)

<sup>17</sup> 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](http://www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf)

The most recent national counter-corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.<sup>18</sup> HMIC's 2015 report *Integrity matters*<sup>19</sup> identified police sexual 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 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 has a proactive approach to identifying officers or staff members who abuse their position of authority for sexual gain, giving it the opportunity to identify individuals who pose a threat to the organisation's integrity and to protect the public. The force has mechanisms in place to identify and manage the risk of officers and staff abusing their position of authority for sexual gain. The head of the professional standards department has briefed sergeants in the force about the signs of officers and staff abusing their authority for sexual gain. The sergeants are fully aware of the force's policy, through information they receive on force investigations and misconduct hearings.

The force has a proactive ongoing operation, developed and run by the anti-corruption unit, called Operation Erasure, which focuses on identifying potential sexual predatory behaviour by police officers and staff members. The operation works on the basis of identify, monitor, enforce and prevent, and uses five indicators: intelligence, misconduct, role held, computer use and sickness. If there is intelligence about an officer or staff member within a particular category, this is given a score which is collated within a scoring matrix. The score is broken down into risk categories of low, medium or high. Workforce members identified as low risk are reviewed every 12 months, those identified as medium risk are reviewed every 6 months and those identified as high risk are reviewed every 3 months, with further interventions and intelligence gathering considered.

The force has an anti-corruption control strategy 2016/17 that details the risk posed by abuse of authority and sexual misconduct.

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<sup>18</sup> 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.

<sup>19</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

The workforce understands the expected standards of behaviour with regard to relationships and recognises abuse of authority for sexual gain as serious corruption. The force ensures that the workforce is made aware of lessons learnt from cases managed by the anti-corruption unit through IPCC bulletins and the professional standards department's newsletter, PSD Times. The force shares information and good practice from the four Welsh forces' anti-corruption units in a regional quarterly meeting and local meetings with staff. Sharing information within departments and with staff has encouraged an open culture to reporting. In 2015 the anti-corruption unit received 161 referrals; 60 have been reported within the first 6 months of 2016. Extra support is provided to people who report information.

The force has referred cases that involve the abuse of authority for sexual gain to the IPCC.

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

Gwent Police has a strategic threat assessment to grade investigations. The force gives intelligence received a primary intelligence assessment, grades it against the threat assessment, allocates it for further intelligence work and then allocates it for further investigation or filing. The force conducts covert operations and also proactively monitors some systems, claims for overtime, sickness reporting and other areas of potential corruption.

### **Taking action to prevent abuse of authority for sexual gain**

The force's professional standards department gives regular in-depth briefings to staff to maintain and reinforce standards. This year, the force provided staff with four three-hour sessions on complaints, misconduct, ethics and standards. Last year's sessions included a focus on sexual misconduct and harassment, because of current investigations in the force, including support for victims, learning about barriers to reporting, and attitudes and culture in the force.

The force now provides training on abuse of authority for sexual gain in all training courses for entry-level recruits, control room staff and supervisors. The force has a comprehensive approach to informing officers and staff about lessons learnt, ethical behaviour, ethical dilemmas, and outcomes of misconduct and gross misconduct cases. It provides regular briefings by the deputy chief constable and head of the professional standards department, examples of ethical dilemmas, bulletins, training and leadership courses and regular force communications. Officers and staff are fully aware of high-profile cases and force standards and expectations, and the signs to look for regarding cases of abuse of authority for sexual gain.

## **Building public trust**

The force has a proactive approach to working with the media after the instigation of criminal proceedings or after the conviction of police officers and support staff, due to its desire to be transparent and to continue to increase confidence in Gwent Police. This includes a recent court case which involved a police custody sergeant who abused his authority when dealing with female colleagues and female detainees. He failed to treat them with courtesy and respect, and failed to have regard to the equality and diversity duty in the workplace. The sergeant was acquitted at court, but then dismissed by the force. The IPCC commissioner said after the case:

“I give credit to Gwent Police for their diligent and determined investigation into his behaviour, and for reaching this fitting conclusion where he can no longer be a part of the police service. The dismissal should send a message to any police officer that the sort of behaviour shown by this sergeant is utterly unacceptable, and bring confidence to colleagues who witness anything like it to report their concerns.”

However, although the force supports victims, it does not demonstrate that it takes active steps to rebuild the trust of affected groups or the wider community.

## **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.<sup>20</sup> 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**

Gwent Police recognises the importance of being open with the public about misconduct cases and clearly understands the impact high-profile cases can have on the relationship between the public and the police.

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<sup>20</sup> *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)



The force publishes details of future misconduct hearings on its website and holds hearings in public when appropriate. The force also publishes the outcome of misconduct hearings on its website, in accordance with the statutory framework. The force provides support to complainants/victims involved in misconduct cases. However, it does not show that it addresses specific communities who may have been affected by misconduct cases to rebuild the trust and confidence that may have been damaged.

The force is open and transparent in its submissions to the College of Policing about officers who have been dismissed or who have resigned during misconduct investigations. It also makes gifts and gratuity registers publicly available on its website.

### **Working with the workforce**

Gwent Police actively informs its workforce about the outcome of misconduct and corruption cases. The chief constable uses a regular blog and the professional standards department uses the force intranet to routinely publish information on misconduct cases that have led to the dismissal of an officer or member of police staff. The outcomes of less serious misconduct (those stemming from a misconduct meeting) are not published in such a routine manner across the wider organisation.

The force also highlights those cases that are high profile in nature or that may have a significant impact on the relationship between the police and the public at staff seminars ('Team Gwent' days). These seminars focus on the specific detail of misconduct cases, the outcome and the lessons to be learnt. The force's approach clearly sets the tone of what it considers acceptable and unacceptable standards of behaviour across the organisation.

## Summary of findings



**Good**

Gwent Police conducts recruitment vetting for new people entering the organisation; however, it has not yet vetted all of the people in designated roles who require a higher level of vetting. There are also backlogs of staff who require re-vetting.

The chief officer team and professional standards department regularly reinforce standards of behaviour using a variety of methods. The force held briefings across the organisation after the dismissal of an officer for sexual misconduct.

The force has an anti-corruption unit that effectively identifies threats to the organisation. For example, Operation Erasure provides the opportunity to identify members of the workforce who may pose a risk with regard to predatory sexual behaviour. The force has a management board made up of key stakeholders which uses management information to identify risks and threats to the integrity of the organisation.

### **Area for improvement**

- The force should ensure it complies with all aspects of the current national guidelines for vetting.

## 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.<sup>21</sup> 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.<sup>22</sup> 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.

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<sup>21</sup> *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](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](http://www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf)

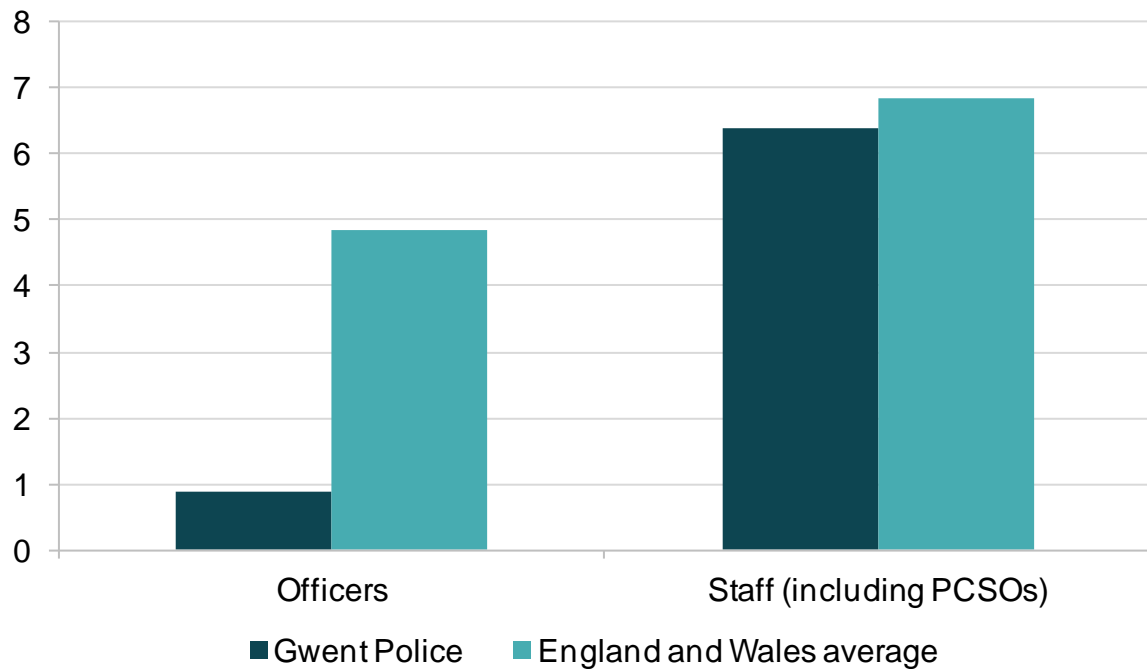
<sup>22</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

[http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%202\\_FINAL\\_REPORT.pdf](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 Gwent Police 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, Gwent Police finalised 0.9 formal grievances raised by officers per 1,000 officers, which was lower than the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 6.4 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).

## Making improvements and demonstrating effectiveness

One of the main goals of Gwent Police's values and vision is to be an employer of choice, so it responds positively to feedback from its workforce and takes action to address any concerns. The force takes the findings of the annual staff survey to the strategic management board, which has senior leaders from across the organisation who are responsible for considering the survey results for their area of the business and policing.

The management board draws up actions taken as a consequence of the survey and publishes them under the 'you said, we did' banner. Recent feedback from the staff survey has led to tutor constables being involved in the recruitment of police officers.

## **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**

Gwent Police understands the importance of promoting wellbeing across the organisation and supports this with a health and wellbeing strategy. The force promotes and publicises this approach to wellbeing through health and wellbeing ambassadors appointed across the organisation. The force has a clear policy to keep members in the workplace and provide appropriate support and access to health and wellbeing services. It has absence management plans to provide managers with a structure to approach sickness management.

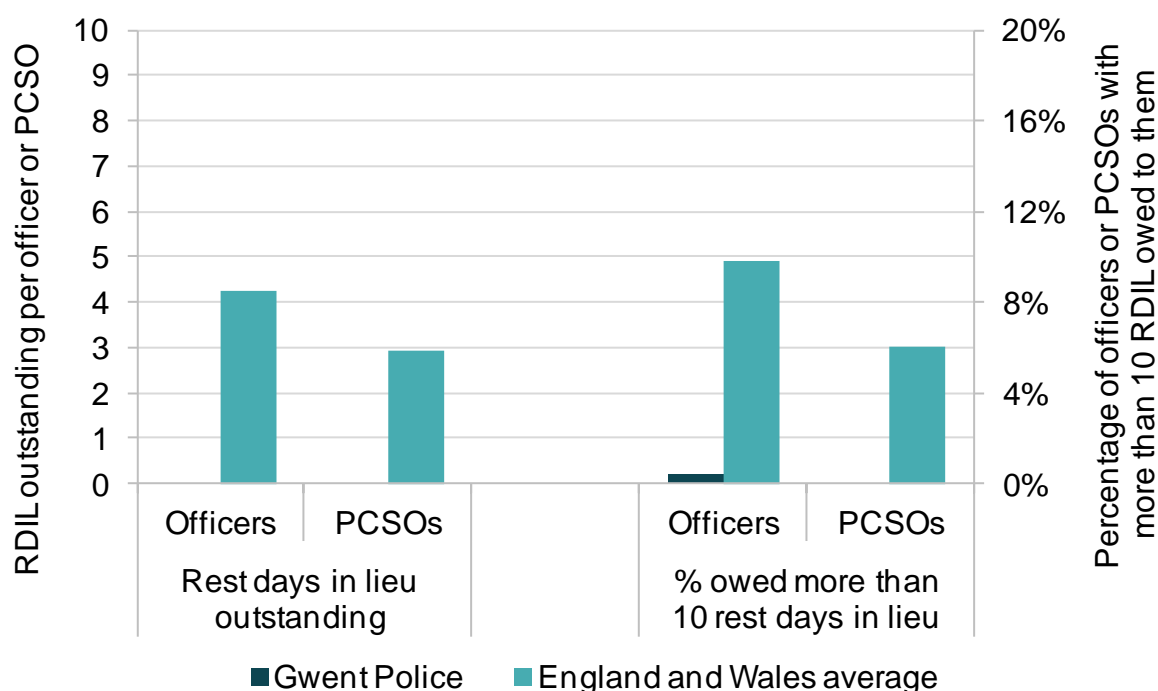
The force has an occupational health unit that takes referrals for physical and mental wellbeing and also an employee assistance programme that provides members of the workforce with 24/7 access to support and counselling services. The force is also actively seeking to promote openness and transparency around mental health, using Time to Talk sessions and support from the mental health charity MIND to raise general awareness further. The force provides training to both constables and sergeants to ensure there are additional opportunities to identify health and wellbeing issues across the workforce. It has a Wellbeing Zone on the intranet giving access to additional information to promote health and wellbeing.

### **Identifying and understanding the workforce's wellbeing needs**

Gwent Police identifies and monitors the wellbeing needs of its workforce, supported by its health and wellbeing strategy. The force reviews sickness across the workforce at the accountability board and it has a system called Qlikview for managers to assess sickness at a local level. It also seeks the views of the workforce on health and wellbeing matters using the staff survey and undertakes psychological screening of those workforce members in high-risk roles on a rolling basis. The force's staff associations and human resources department review instances of assault on both police officers and police staff members.

Rest days in lieu (RDIL) are leave days owed to officers or PCSOs when they have been required to work on their scheduled rest day for 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. Analysis of the numbers of RDIL accrued, but not yet taken, can be a useful tool 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 Gwent Police compared with England and Wales, as at 31 March 2016**



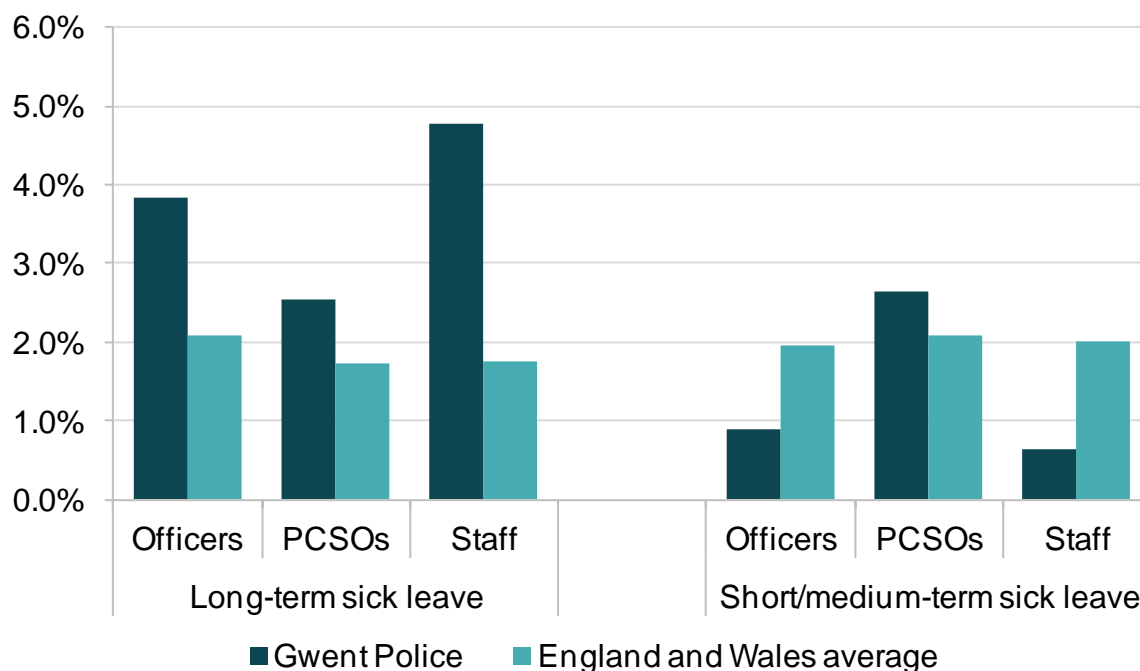
Source: HMIC Legitimacy data collection

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.

Gwent Police could not provide data for rest days in lieu outstanding for officers as at 31 March 2016. On the same date, the England and Wales average was 4.2 rest days in lieu outstanding per officer. Gwent Police could not provide data for rest days in lieu outstanding for PCSOs as at 31 March 2016. On the same date, the England and Wales average was 2.9 rest days in lieu outstanding per PCSO. As at 31 March 2016, 0.4 percent of officers in Gwent Police had more than 10 rest days in lieu owed to them, which was lower than the England and Wales average of 9.8 percent. As at 31 March 2016, no PCSOs in Gwent Police 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 Gwent Police 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.
- 3.8 percent of officers were on long-term sick leave, which is higher than the England and Wales average of 2.1 percent.
- 0.9 percent of officers were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.
- 2.6 percent of PCSOs were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.
- 2.6 percent of PCSOs were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.1 percent.
- 4.8 percent of staff were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.

- 0.6 percent of staff were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.

### **Taking preventative and early action to improve workforce wellbeing**

Gwent Police takes a variety of preventative measures to improve the health and wellbeing of its workforce, underpinned by its health and wellbeing strategy.

The force has recently invested in pedometers, which have generated a healthy competitive environment for the workforce to take part in exercise throughout the working day and is seen as a positive initiative across the workforce. The force has also adopted an open and positive approach to mental health, with 24/7 access to support and counselling services and psychological screening for those in roles considered to be high risk. The force has a trauma support and prevention scheme, which provides officers with tools (such as mindfulness and journaling) both to prevent and to deal with issues caused by traumatic and challenging incidents.

The force has also provided sergeants and constables with training to help them identify health and wellbeing issues in the workforce

### **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.<sup>23</sup> 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.<sup>24</sup>

#### **The performance assessment process**

Gwent Police has recently (April 2016) revised and reintroduced its individual performance assessment process, which requires all officers and staff members to have a current appraisal and take part in face-to-face discussions with their line managers. The new process is designed to ensure a force-wide approach to, and governance of, performance assessment; in the past, it was not applied consistently across the force.

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<sup>23</sup> *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](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf)

<sup>24</sup> College of Policing guidance on the police performance development review process is available at: [www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx](http://www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx)



The new appraisal system should allow talent to be identified and provide a place for recording evidence about people's standards of performance. The appraisal system will focus around three mandatory areas: public confidence, customer satisfaction and performance. During the inspection, those we spoke to had mixed views about the value of the appraisal system but indicated a willingness to take part in the process and saw the benefit of discussions with line managers.

It is too soon to assess the revised and reintroduced appraisal process, but it is clear that the force has a vision for performance assessment and has taken steps to implement it.

### **The results of performance assessment**

Gwent Police has only recently revised and reintroduced its performance assessment process (April 2016) for all members of the workforce. The force's vision is to ensure that all officers and staff take part in the process. The appraisal system should allow evidence to be recorded to support the development of the workforce and also address underperformance.

## **Summary of findings**



**Good**

Gwent Police frequently seeks the views of its staff through established methods of engagement.

The force has a well-established health and wellbeing strategy that is supported by a range of practical measures to promote health and wellbeing. The workforce recognises the value of this. The force also undertakes preventative work in order to improve workforce wellbeing.

The force has recently introduced an individual performance assessment process and as yet is unable to provide evidence on whether this is operating effectively. The new system requires face-to-face meetings to take place and evidence to be recorded around three identified areas: public confidence, customer satisfaction and performance.

### **Area 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](http://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](http://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.<sup>25</sup>

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

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<sup>25</sup> *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](http://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 Constabulary), 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](http://www.gov.uk/government/statistics/police-workforce-open-data-tables)