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# PEEL: Police legitimacy 2016

An inspection of Kent Police



December 2016

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ISBN: 978-1-78655-293-8

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# Contents

<b>Introduction</b> .....	<b>4</b>
<b>Force in numbers</b> .....	<b>6</b>
<b>Overview – How legitimate is the force at keeping people safe and reducing crime?</b> .....	<b>8</b>
<b>To what extent does the force treat all of the people it serves with fairness and respect?</b> .....	<b>10</b>
To what extent does the force understand the importance of treating the people it serves with fairness and respect?.....	10
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? .....	11
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? .....	16
Summary of findings .....	18
<b>How well does the force ensure that its workforce behaves ethically and lawfully?</b> .....	<b>20</b>
How well does the force develop and maintain an ethical culture?.....	20
How well does the force identify, understand and manage risks to the integrity of the organisation? .....	22
How well is the force tackling the problem of officers and staff abusing their authority for sexual gain?.....	24
How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases? .....	27
Summary of findings .....	28
<b>To what extent does the force treat its workforce with fairness and respect?.</b> <b>29</b>	
How well does the force identify and act to improve the workforce’s perceptions of fair and respectful treatment? .....	29
How well does the force support the wellbeing of its workforce? .....	31

How fairly and effectively does the force manage the individual performance of its officers and staff? .....	35
Summary of findings .....	36
<b>Next steps .....</b>	<b>37</b>
<b>Annex A – About the data.....</b>	<b>38</b>

## 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 Kent Police.

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

## Force in numbers



### Workforce

Total workforce as of 31 March 2016

**5,449**

Total workforce breakdown as of 31 March 2016

officers

**3,182**

staff

**1,978**

PCSOs

**289**



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

**2.7%**

officers

**2.9%**

staff

**2.5%**

PCSOs

**1.0%**

Percentage of BAME in local population, 2011 Census

**6.9%**



### 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

**27%**

Kent Police

officers

**61%**

staff

PCSOs

**48%**



## Public complaints

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

Officers

Kent Police

227

England and Wales force average

268

Staff (including PCSOs)

64

61



## Grievances

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

Officers

Kent Police

2.5

England and Wales force average

4.8

Staff (including PCSOs)

2.2

6.8



## Victim satisfaction

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

Kent Police

92.9 %

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 judgment<sup>3</sup>



**Outstanding**

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

The force's approach to treating the people it serves with fairness and respect is outstanding. It is good at ensuring that its workforce behaves ethically and lawfully. Kent Police has an exceptionally strong ethical culture; the range of ways it effectively communicates with the public underpins its legitimacy. The force also has an outstanding approach to workforce wellbeing and fair treatment.

## Overall summary

Kent Police is outstanding at treating the people it serves with fairness and respect. The force seeks feedback and challenge from the public frequently, including from those who may have less trust and confidence in the police or who are less likely to complain or take part in traditional forms of engagement. For example, it holds public meetings, undertakes surveys and uses social media, and works with independent advisory groups. The force responds to feedback and ensures that the workforce are made aware of any lessons that should be learnt.

The force is good at ensuring that its workforce behaves ethically and lawfully. It has an exceptionally strong ethical culture in which it reinforces acceptable and unacceptable behaviours. The force vets all people applying to be officers, staff or volunteers, and contractors. It has a proactive approach to risks to the integrity of the organisation and uses a range of techniques to gather and assess intelligence relating to potential corruption.

Officers and staff understand the seriousness of the abuse of authority for sexual gain (taking advantage of a position of power to exploit vulnerable victims of crime) and the force treats it as serious corruption. The force is proactive in seeking intelligence on potential abuse of authority from a range of sources, including

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



women's refuges, prostitutes, ethnic minority groups, and from monitoring its IT systems. It publishes full details of misconduct cases on its website for the public and on the intranet for its workforce.

The force is outstanding at treating its workforce with fairness and respect. Its use of culture and ethical boards alongside open challenge forums, such as 'Ask the Chief', have allowed it to identify and act quickly to improve the workforce's perceptions of fair and respectful treatment. The workforce is involved in decision-making about wellbeing and ethical matters. Supervisors across the force have a comprehensive understanding of their wellbeing responsibilities, and are well prepared and supported to implement them. The force's personal performance management arrangements are well established and effective, and are supported by the workforce.

### **Recommendations**

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

## 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

Kent Police has a clear and well-established vision and values called ‘Do the right thing’. These are built on, and in line with, the Code of Ethics.<sup>6</sup> The force has an exceptionally strong ethical culture which emphasises understanding of the code and the importance of fair and respectful treatment. These principles are well reflected in

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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.*

<sup>6</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)

force policies. As a consequence, the chief constable was invited to make a presentation to the National Police Chiefs' Council<sup>7</sup> on how the force developed its strong ethical culture. The force has built on the excellent work recorded in HMIC's legitimacy report of 2015. Comprehensive arrangements are in place to provide the entire workforce, including volunteers, with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. The ethics boards and culture boards are mature and are used to underpin the organisational values. Schemes include holding master classes for staff on diversity issues, such as unconscious bias, and Special Constabulary colleagues completed training on the code and integrity, which was led by the professional standards department (PSD). All schemes are indicative of the force's strength in this area. These examples demonstrate that the force has an excellent ethical base on which stands its service provision.

## **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**

The force frequently seeks feedback and challenge in a range of ways from the people it serves. These include encouraging those identified as having less trust and confidence in the police, and those less likely to complain or take part in traditional forms of engagement, to have a voice. Examples include telephone surveys, use of the Kent crime and victimisation surveys, strong community involvement by police and community support officers (PCSOs), and community and neighbourhood meetings. There is a healthy presence on social media where the force provided evidence to show that it has 89,000 followers on Twitter and 67,000 likes on Facebook, with a reach that can exceed to over 250,000 from a single post. The force also has a presence on Vine, YouTube, Instagram and Google+. Regular force 'open days' attract large numbers of people – around 10,000 a day – and allow the force to engage with the public across a range of subjects.

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<sup>7</sup> The National Police Chiefs' Council (NPCC) helps the police cut crime and keep the public safe by joining up the operational response to the most serious and strategic threats. The NPCC brings together 43 operationally independent and locally accountable chief constables and their chief officer teams to co-ordinate national operational policing.

The force works with the Roma community in the east of the county through regular family events and a weekly Roma youth group where the community is able to meet and discuss issues and concerns and give feedback to the force. Working with Red Zebra Community Solutions<sup>8</sup>, engagement opportunities and third party reporting processes have been established for people with disabilities and mental health issues. There is an independent police advisory group (IPAG) that works with those groups identified as having less trust and confidence in the police and those less likely to complain or take part in traditional forms of engagement. The IPAG has a webpage which details their work and gives access to recent reviews, including those on hate crime and domestic abuse. There is also a Traveller and Gypsy forum to ensure engagement with these communities. This means that the force is better placed to understand the issues and concerns of these communities which they have identified as having less trust and confidence in the police. The force has engaged with the Duke of Edinburgh's Bronze Award programme with officers working with the scheme and thereby engaging with young people. This scheme targeted young people known for going missing and those engaged in criminal activities, gangs, drugs, sexual offences, anti-social behaviour, prostitution and pimping.

Further work includes significant activity to engage with black and minority ethnic (BME) communities by a wide variety of means, including radio pieces, officers' attendance at community events, discussions such as with the Islamic Group at University of Kent and use of the Blue Water safety store where the force is able to engage with shoppers on a daily basis listening to concerns and receiving feedback. Events at the store are advertised via local radio, community groups, faith leaders, Facebook and Twitter. In previous inspections, we found that officers understood their local communities and that using neighbourhood crime profiles helped them share this knowledge. This is now further enhanced by the force's use of the Kent County Council mapping data on local demographics to determine the best method of contacting members of the public, including those identified as having less trust and confidence in the police.

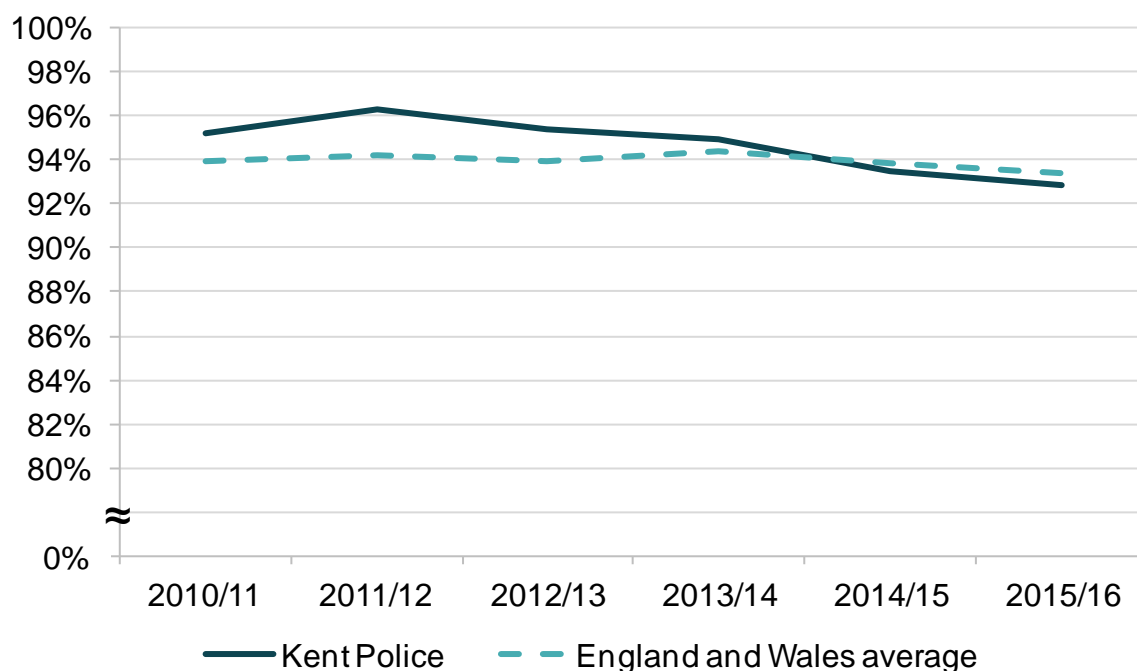
### **Identifying and understanding the issues**

All forces are required to conduct victim satisfaction surveys with specified victims of crime groups, and to 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.

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<sup>8</sup> Red Zebra is a voluntary organisation that seeks to link people with health and community activities.

**Figure 1: Percentage of victims satisfied with overall treatment by Kent 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 1 please see annex A**

In the 12 months to 31 March 2016, 92.9 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Kent Police, which was broadly in line with the England and Wales average of 93.4 percent, and lower than the 93.5 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015. This is not a statistically significant difference.

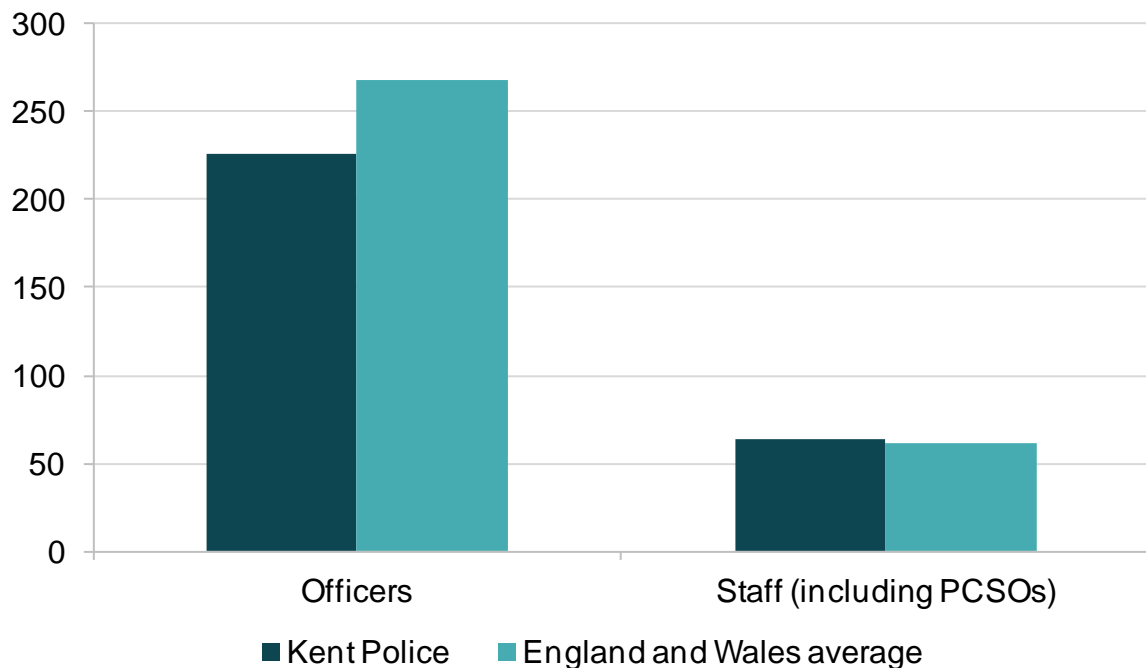
When the force identifies community issues regarding fair and respectful treatment, these are managed by the relevant policing area with the option of support from specialists such as the communications department and the PSD. Information from the policing areas is used to inform strategic and tactical meetings held at headquarters, which evaluate performance, threats and risks. The force also works with academic institutions, such as Kent University and independent experts, to better understand the issues and inform responses. Examples of the force taking action in response to public concerns include bespoke policing operations designed to reduce anti-social behaviour in communities afflicted by the problem. In one such example we reviewed, a dispersal order had been effectively used and received public approval. Other examples of the force undertaking action in response to concerns about fair and respectful treatment is the establishing of the Gypsy and Roma family meetings which seek to break down barriers and give the communities a voice, and the force’s ‘Rural matters’ initiative that brings the force together with rural communities to discuss activities to address identified issues. The force publishes a ‘Rural matters’ magazine that includes details of these discussions and

current activity alongside articles providing a range of information on rural concerns. There is also a crime rural advisory group (CRAG), which assists in generating debate between rural communities and the force by indentifying issues and then tabling them for discussion.

The independent custody visiting association (ICVA)<sup>9</sup> reports regularly on how the force is treating detained people. It reports that officers and staff in the force’s custody suites clearly understand the need to be fair and respectful – officers’ ethical and respectful behaviour being described simply as "just [their] natural conduct".

Each force in England and Wales is required to record the nature of complaint cases and allegations, and to 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 to take steps to improve how they treat the public.

**Figure 2: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) in Kent 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 2 please see annex A**

<sup>9</sup> The ICVA is a Home Office-funded organisation set up to promote and support the effective provision of custody visiting nationally. A national resource on custody visiting, ICVA works closely with government and criminal justice organisations to:

- raise public awareness on the rights, entitlements, health and wellbeing of people held in police custody;
- advise on best practice for independent custody visiting schemes nationally; and
- provide training, publicity and support to police and crime commissioners and independent custody visitors.

In the 12 months to 31 March 2016, Kent Police recorded 227 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 64 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 Kent Police are 'other neglect or failure in duty' and 'incivility, impoliteness and intolerance', 'other irregularity in procedure' and 'other assault'.<sup>10</sup> It is important to note, however, an issue identified during our 2014 inspection on police integrity and corruption:<sup>11</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.

In response to complaints, officers apologise, if appropriate, in face-to-face meetings, and in some instances, where the force considers it will be informative and supportive, members of the public are offered escorted patrols with frontline officers to enable them to gain an understanding of police work and, as a result, improve their trust and confidence in the police.

Following HMIC's 2014 police integrity and corruption report, the force received four recommendations. These were that the force should:

- ensure that it had sufficient capability and capacity to enable the timely and proportionate investigation of complaints;
- publish a policy on suspension, resignation and retirement of officers under disciplinary investigation;
- publish a policy on substance misuse and drug testing to identify and deter substance misuse, and to communicate this to the workforce; and
- review and confirm the line management arrangements of the joint Essex Police and Kent Police operational security unit.

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<sup>10</sup> Independent Police Complaints Commission data are 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>11</sup> *Integrity matters*, HMIC, January 2015. Available at: [www.justiceinspectrates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectrates.gov.uk/hmic/publications/integrity-matters/)

The force has responded successfully to these recommendations. Staff are in post to enable timely investigations, the two policies are in place and are being used, and the operational security unit is now led by Kent Police, all of which have helped the force improve the way it deals with complaints made by the public.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,<sup>12</sup> the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.<sup>13</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>14</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. HMIC will re-assess the force's compliance with those features of the scheme that it was not complying with in 2015.

All individuals subject to a stop and search are provided with a stop and search reference card. The information on this card includes reference to the Kent Police website 'Stop and search page', which gives advice on how to make a complaint and also sets out the law regarding stop and search. The IPAG reviews stop and search records and those encounters that have been filmed on body-worn video cameras.

These examples demonstrate that the force is well placed to identify and understand issues that are of concern to its communities.

## **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.

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<sup>12</sup> *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/](http://www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/)

<sup>13</sup> Best Use of Stop and Search Scheme, Home Office, August 2014. Available at: [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>14</sup> *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/)



## **Making improvements**

The force explores the feedback and information it has gathered at several of its management meetings. These include the performance meetings, strategic change board meetings and chief officer strategic meetings, which is the executive board that agrees, prioritises and signs off many actions to mitigate issues, including changes to policy and procedure. The force also makes extensive use of data and the MoRiLE<sup>15</sup> risk management tool to develop its strategic and tactical responses to identified issues.

The force uses a variety of methods to feedback lessons learned to the workforce. These include the 'chief's blog', which has a very high hit rate, intranet articles and through training. The force's learning and development department frequently communicates to the workforce the lessons learned from community feedback and, importantly, the causes of negative perceptions by using national and local 'learning the lessons' documentation in training sessions. The department follows up students after their training, either remotely or face-to-face, to assess the impact of the training. Recently, training on appropriate data use was revisited as a direct result of inappropriate data use coming to light through this process. Guidance given to all staff via the website and training was amended to ensure that it incorporated the lessons learned. Probationary officers undertake community placements including with those communities that have less trust and confidence in the police. For example, officers attend mosques and work with the Muslim community in order to develop a deeper understanding of their needs and how to behave respectfully towards them.

The force uses a range of communication and feedback methods to work with communities and emphasise changes in how it provides services to improve perceptions of fair and respectful treatment. It has won awards for its work in this area, including Corporate Communications Digi Awards' Best integrated campaign – corporate: 'Whoever you are you're not alone'. This was a multimedia campaign that sought to increase engagement with victims of domestic abuse whom the force has identified as being less likely to work with the police because of a lack of trust and confidence. The campaign was designed to increase victims' feelings of empowerment to report domestic abuse. The campaign included short videos which were promoted through Vine, on Twitter and via YouTube to the force's Facebook and Google+ pages.

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<sup>15</sup> MoRiLE uses a range of methods that assist decision makers in identifying and prioritising threat, risk and harm. These intrinsically link threat, risk and harm assessments to organisational capacity and capability to respond.

## Demonstrating effectiveness

The force uses a wide range of methods to work with the public, including face-to-face, web-based and traditional methods such as phone surveys. Feedback from communities has been used to tailor ethical training and the force makes use of national and local 'learning the lessons' documentation. The force has shown that it is listening to the public and responds to their concerns. Examples include the recent response to the closure of the channel ports called 'Operation Stack'<sup>16</sup>, which involved difficult and protracted operations. Complaints had been received from the public about mixed and confusing messages from the different agencies involved. The force responded by introducing a communication cell jointly with other agencies that ensured a more co-ordinated messaging service to the public. In another example, when the force received negative feedback from residents in Dover in response to a public order incident, officers undertook a community impact assessment and worked closely with the local MP and general public, explaining the legal constraints they had to operate within, such as freedom of speech, while also listening to the public's concerns. The force responded by amending the tactics of subsequent operations. In reaction to concerns from the counties' rural communities regarding its responses to rural crime, the force engaged with rural communities including farmers, landowners, gamekeepers and national bodies such as English Heritage and the National Farmers Union (NFU) to produce a response that included partnership working. The changes were launched at a conference attended by many rural organisations and community leaders.

Overall, we found that the force understands its communities and provides effective means through which priorities and concerns of those communities can be raised, although it could do more to seek feedback and assess the effectiveness of its actions.

## Summary of findings



**Outstanding**

Kent Police is outstanding at treating with fairness and respect the people it serves. The force has an exceptionally strong ethical culture which emphasises understanding of the Code of Ethics and the importance of fair and respectful treatment. The force seeks feedback and challenge in a range of ways. It communicates regularly and effectively with the public it serves, including encouraging those identified as having less trust and confidence in the police, and

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<sup>16</sup> Operation Stack is the force's response to the closure of the channel ports on the French side, which then requires that heavy goods vehicles are parked on the M20 for extended periods of time causing substantial traffic problems.

those less likely to complain or take part in traditional forms of engagement, to have a voice. Engagements with young people – in particular those engaged in crime and gangs – and those with the Gypsy and Roma communities, are notable. The force works with academic institutions and independent experts to understand the issues better and inform its responses.

The force makes good use of feedback and learning to improve how it treats all the people it serves, and we found that officers clearly understand their local communities. This means that the force's very strong ethical culture has enabled it to listen effectively to its communities and to provide them with improved services.

## 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>17</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>18</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>19</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>17</sup> *Integrity matters*, HMIC, January 2015. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

<sup>18</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>19</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) 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**

The force's vetting processes are mostly compliant with national guidance on recruit vetting, and this has been validated through an independent audit. The force is working to reach full compliance. The force vets all officers, staff, volunteers and contractors prior to recruiting them. The vetting unit is involved throughout the recruitment process. Contractors are not permitted access to police premises until the vetting process is complete. The force is aware that the vetting process may affect its recruitment of a diverse workforce. We found that the force audits a random 10 percent of all applicants to ensure that decisions are fair and appropriate. However, the force does not record diversity data, because it considers that diversity does not affect the vetting process.

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 is exceptionally strong in reinforcing acceptable and unacceptable behaviours, and the Code of Ethics is a routine element of its policies and procedures. We found that all senior leaders and supervisors comprehensively understand the importance of the authenticity of how they act as ethical role models and that they act accordingly.

There is a good knowledge across all the force of important policies that are designed to ensure that officers and staff conduct themselves in a professional manner and with integrity. These include policies relating to the workforce declaring their business interests, notifiable associations, misuse of police information and inappropriate relationships. 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.

The force publishes details of misconduct hearings, including both the conduct and names of individuals involved, in its internal notices. We found that these items were read extensively across the force and that supervisors discuss the issues at local briefings. Senior leaders continuously promote their expectations of acceptable and unacceptable standards of behaviour through a range of methods, including the chief constable's roadshows, web-based information feeds and boards designed to promote ethical behaviours. In addition, the PSD publishes regular learning lessons

notices, which detail recent issues, and the force tests officers' reactions to diversity scenarios through training courses which include scenario-based lessons on the Code of Ethics.

The force is good at ensuring that officers and staff understand the seriousness of the abuse of authority for sexual gain. Officers from the force counter-corruption intelligence unit promote understanding of inappropriate sexual behaviour, and provide advice and guidance to staff.

## **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>20</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**

Kent Police does not have an anti-corruption control strategy. However, it does have an 'integrity model', which is in line with the National Crime Agency's counter-corruption strategic assessment that is completed on an annual basis. The force designates individuals to be 'risk owners' – responsible for mitigating specific risks. These risk owners have developed and supported the model to enable the force to identify potential threats, implement and maintain controls, and mitigate risk and harm. Quarterly meetings address upcoming issues and ensure that the integrity model remains relevant. The head of the PSD meets regularly with the deputy chief constable and attends the weekly chief officer strategic meeting. We found that the PSD has a good understanding of the organisational risks it is responsible for mitigating.

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<sup>20</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/)

Details of occasions on which officers and staff are offered gifts or hospitality are recorded fully by the officer or their supervisor in a centrally held database (including cases where the offer was refused). The PSD audits this database regularly, challenging or investigating inappropriate entries. Details of all occasions on which officers and staff have applied for authorisation for a business interest are recorded fully by the human resources department in a centrally held database and include where the application was refused. Probationary officers spoke of having four days of initial training on integrity issues, such as notifiable associations, and on use of social media such as Facebook.

The force analyses patterns to assess areas of potential corruption, proactively looking at and accessing intelligence. It conducts telephone audits every six months, uses a 'web crawler' tool to monitor workforce internet activity, and uses a profiling tool to build patterns of behaviour of officers and staff that may merit investigation.

The force complies with the requirements for aftercare vetting, including annual vetting appraisal. It reviews the vetting status of officers transferring to sensitive posts to see if a re-vet is required and routinely re-vets officers who move to posts with higher vetting requirements, including those on promotion.

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

The force can identify and intervene to manage individual and organisational risks. Examples include the force identifying a rise in sexual misconduct reports in February and an increase in reports of timekeeping issues. We found that the force had taken action in both these areas. The PSD has a comprehensive performance regime that includes information at force and individual levels allowing it to track interventions at both levels. Counter-corruption investigation unit officers work with local supervisors to offer advice and guidance.

Items about lessons learned from both the force and the IPCC are published by the PSD on a monthly basis. Subjects covered include use of force in custody, information management, death messages and inappropriate disclosure.

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

The force has a range of techniques that it uses to gather and assess intelligence relating to potential corruption. Each division has an anti-corruption officer who trains senior staff in anti-corruption practices and also provides feedback into the central PSD. The force also has both confidential and non-confidential wrongdoing reporting telephone lines. Staff are aware of these lines and all staff interviewed spoke of a willingness to challenge or report inappropriate behaviour. The PSD liaises with the serious crime directorate regarding reports of corruption that have emerged from organised crime group activities, and they use a 'web crawler' and a profiling tool to

build patterns of officers and staff behaviour across all its systems to identify cases that warrant an investigation. The PSD also uses reports of corruption within public complaints as a source of information.

The force deals effectively with corruption-related intelligence. It has a strong performance framework to manage issues it identifies. The PSD performance pack also includes details on the routes of reporting, including the use of the confidential reporting line. The latest pack highlighted an increase in sexual misconduct, noting that while the numbers of reports were historically low, increases had been experienced in the reporting month. The force maintains an anti-corruption unit (ACU), which is able to monitor a range of activities, including inappropriate access to force information. An analyst works with the ACU to assess the intelligence gathered, and records the routes by which the intelligence is gathered, and the detailed performance data that are produced and show the amount, source and time taken to act on the intelligence gathered. Intelligence is gathered from a range of sources and routes including data from systems, external and internal reports, and network analysis. The PSD team has collaborated with Essex Police. Both forces feed intelligence packs into a superintendents' group that decides which investigations, including covert investigations, should be undertaken.

The force has a policy on substance misuse and drug testing to identify and deter substance misuse. It began random testing in May 2015. This is in line with the recommendations made in HMIC's 2014 Police integrity and corruption report. Staff are aware of the policy and how it is being used.

## **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) published *The abuse of police powers to perpetrate sexual violence*.<sup>21</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* – which sets out the standards of professional behaviour expected of all policing professionals – explicitly states that they must "not establish

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<sup>21</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)



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.<sup>22</sup> HMIC’s 2015 report *Integrity matters*<sup>23</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’s integrity model includes sexual predation as an identified risk and it is evident that the force treats the abuse of authority for sexual gain as serious corruption. Staff are aware of the requirement to refer serious corruption, such as abuse of authority for sexual gain, and the force has made very clear via briefings and news items to officers the seriousness of abusing their position for sexual gain and the dangers of inappropriate relationships with vulnerable victims. The force is working on a short video piece using actors that will portray the issues in a visual format and will include the impact on officers of this type of behaviour.

The force identified a rise in sexual misconduct reports in February and we found that it had taken action in identified cases. The PSD has a comprehensive performance regime that includes information at force and individual levels allowing it to track interventions at both levels. Counter-corruption investigation unit officers work with local supervisors to offer advice and guidance. All cases are subject to mandatory referral to the IPCC and indeed the latest two cases have been referred. Both cases involve inappropriate contact with victims, one of whom was already the victim of a sexual assault.

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<sup>22</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 on 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>23</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/)

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

The force proactively seeks intelligence on potential abuse of authority from a range of sources, including women's refuges, prostitutes and ethnic minority groups, and local officers have been tasked to reach out to local communities that may be vulnerable to this type of abuse. The force has an offender profile, which is helping them to target messaging within the force. Work with other public services has been initiated and in particular with the Kent Fire and Rescue Service to seek ways to deal with workers who abuse their position for sexual gain. More could be done to support and inform victims of domestic abuse of the risks of inappropriate post-incident officer contact. If a complaint about inappropriate sexual conduct is made, a minimum standard of investigation is triggered from the PSD, which includes a review of the individual's complaint history, use of information technology, timekeeping and patterns of overall behaviour.

The force is able to monitor its systems to identify officers and staff trawling for vulnerable victims. As is evident in recent cases, once inappropriate behaviour is suspected, the force is very proactive at taking positive action including safeguarding of the victim. Officers are encouraged to report suspicions to their supervisor, to the PSD directly, or via the force's anonymous reporting system.

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

Kent Police has a good understanding of the scale and source of the problem of abuse of authority for sexual gain as is evidenced from the PSD performance information. In an effort to prevent officers and staff developing inappropriate relationships, including with victims of domestic abuse, and to intervene early to stop potential corruption where risks have been identified, the force has included abuse of authority scenario-type training within the Code of Ethics training sessions that all officers and staff undertake.

New probationary officers receive a bespoke PSD briefing on abuse of position to develop relations with vulnerable victims. Newly promoted officers and staff also receive PSD input on the abuse of position. A briefing called 'Professional boundaries' was produced in May 2014 in collaboration with the Police Federation, and was published in the force magazine, 'Relay', and on the intranet. Briefings, including of real cases, intranet items and chief officers' blogs have all stressed the absolute inappropriateness of this type of behaviour and the likely outcome. All misconduct of this nature is released to staff, as are lessons learned and IPCC documents. The media assessment for the promotion processes in force was on this subject this year.

Abuse of authority (involving sexual misconduct) has its own strand of work and action plan in the force under the ACPO integrity model, and is therefore subject to regular review and action planning.

The Kent PSD 'Corruption vulnerability aide-memoire' has been produced and circulated to all staff to enhance understanding and the identification of warning signs. This can be used in three ways by staff: as a preventative self-reflection, for peer-to-peer review and for line manager intervention.

The force has recently dealt with two cases where officers abused their position and formed relationships with vulnerable women they met through their work. Both cases resulted in the officers leaving the force.

### **Building public trust**

The force engages positively with the public regarding the outcomes of misconduct and corruption cases, but more should be done to rebuild confidence and trust within affected groups and the wider community after such cases. The force seeks to highlight to the public that this kind of behaviour is not acceptable and should be reported, and efforts are made at the close of these cases to engage with the victims about the communications that are released. The force publishes the outcomes of misconduct hearings to the public in cases of abuse of authority for sexual gain and serious sexual offences. However, although each case has an individual communication strategy, there is no overall corporate strategy to mitigate the impact of negative news stories either externally or internally.

## **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>24</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**

The force publishes the outcomes of misconduct cases on its website. The details are of recent cases, are comprehensive and include the name of the officer or staff member, the details of the misconduct and the outcome and penalty. At the time of our inspection, the website included details of four cases from February and March

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<sup>24</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/)

2016 and details of all cases from April 2014 to March 2015. The website also includes information on what to do at a misconduct hearing and explains how a misconduct hearing works. Up-to-date details of officer gifts and hospitality that senior officers have received are available through the force website in line with national guidelines.

### **Working with the workforce**

The force publishes full details of all misconduct cases on the intranet and in its in-force magazine 'Relay'. Officers were fully aware of this and considered that this was a good thing as it made officers better aware of what poor behaviour was. The Police Federation has been proactive in working with the PSD to relay messages about sexual corruption and inappropriate system checks. The PSD has recently begun sending out letters to officers who have undertaken ethical and good work to help promote what 'good' looks like to the wider workforce.

## **Summary of findings**



**Good**

Kent Police is good at ensuring that its workforce behaves ethically and lawfully. The force vetting process is mostly compliant with national guidance on recruit vetting and this has been validated through an independent audit. The force is good at reinforcing acceptable and unacceptable behaviours, and the Code of Ethics is a routine part of standard force practices. All senior leaders and supervisors comprehensively understand the importance of the authenticity of how they act as ethical role models and act accordingly.

The force can identify, understand and manage risks to the integrity of the organisation, assisted by the use of pattern analysis, telephone audits and the proactive use of the 'web crawler' tool. The force deals effectively with corruption-related intelligence. It monitors performance in detail and is able to track the timeliness of its activity both to manage and investigate issues identified and the course of action taken. The force publishes full details of misconduct cases on its website and intranet for public and internal reference. This means that the force is exceptionally good at ensuring that its workforce behaves ethically and lawfully, supported to a very large extent by the impressively strong ethical culture that it has developed.

## 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>25</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>26</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.

#### Identifying and understanding the issues

Kent Police regularly undertakes staff surveys. The force informed us that the latest survey closed in January 2016, attracting a 24 percent return rate. Despite the low return, the survey helped highlight to the chief officer team the issues of concern to the workforce. Staff told us that they often did not feel that they had the time to

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<sup>25</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>26</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

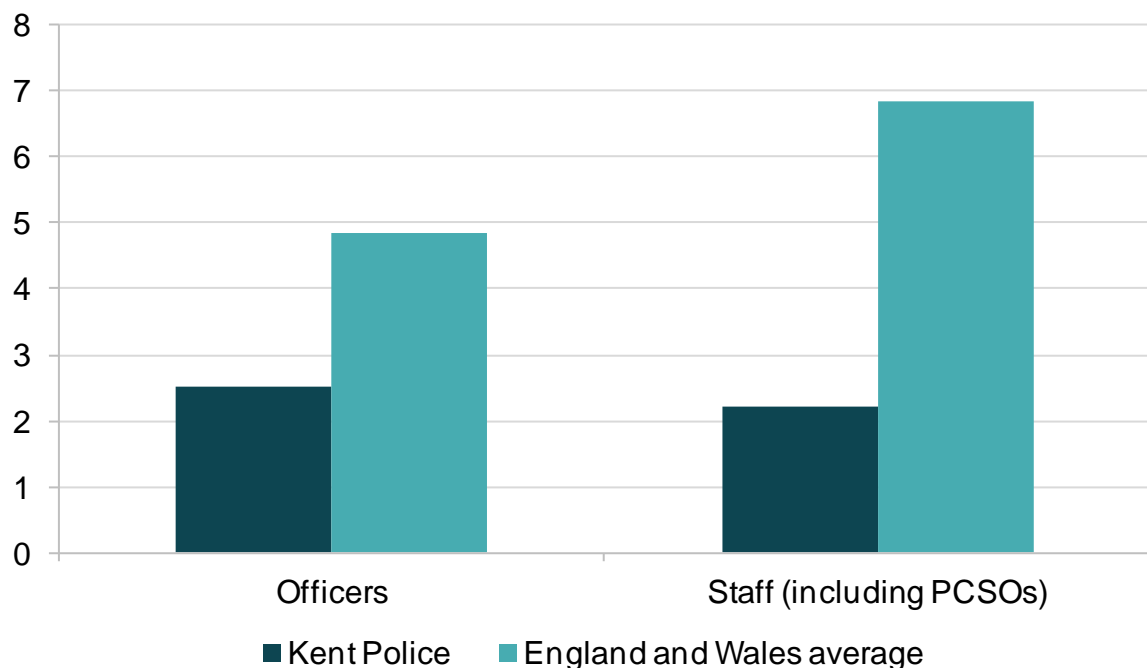
[http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%202\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf)

complete the survey but that they used either the ethics or culture boards and ‘Ask the chief’ sessions to raise issues. Furthermore, the ‘IdeaDrop’ scheme, which the force recently introduced, received a very positive response from the workforce. This scheme allows all officers and staff to post an idea and to comment on or rate the ideas of others. Ideas can be themed and posted globally, or just within teams and directorates. Senior managers can set challenges and encourage teams to help find better ways to do things. We found that these means of raising issues are very well received.

The force comprehensively understands issues relating to fairness, including grievances, complaints and misconduct matters. Data and information on these areas are reviewed by the human resources department and any issues taken to the appropriate executive board. This means that the force is able to respond quickly to issues and identified problems.

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 Kent 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, Kent Police finalised 2.5 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 2.2 formal grievances raised by staff per 1,000 staff (including PCSOs), which was lower than the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

### **Making improvements and demonstrating effectiveness**

The force-wide cultural and ethics boards, the chief's blog and IdeaDrop have enabled the force to identify issues and then undertake effective, timely and often innovative action in response to issues identified by the workforce. Examples include the 'Develop you' initiative, which was introduced in response to concern about lateral development opportunities. Another example was the decision to place all misconduct investigations under PSD management, rather than those relating to police staff being managed by the human resources department, in order to address perceived unfairness by police staff in these matters. Officers told us that the chief officer team is very accessible to the workforce, and debates and discusses issues and improvements with them, including through the chief's blog.

## **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.

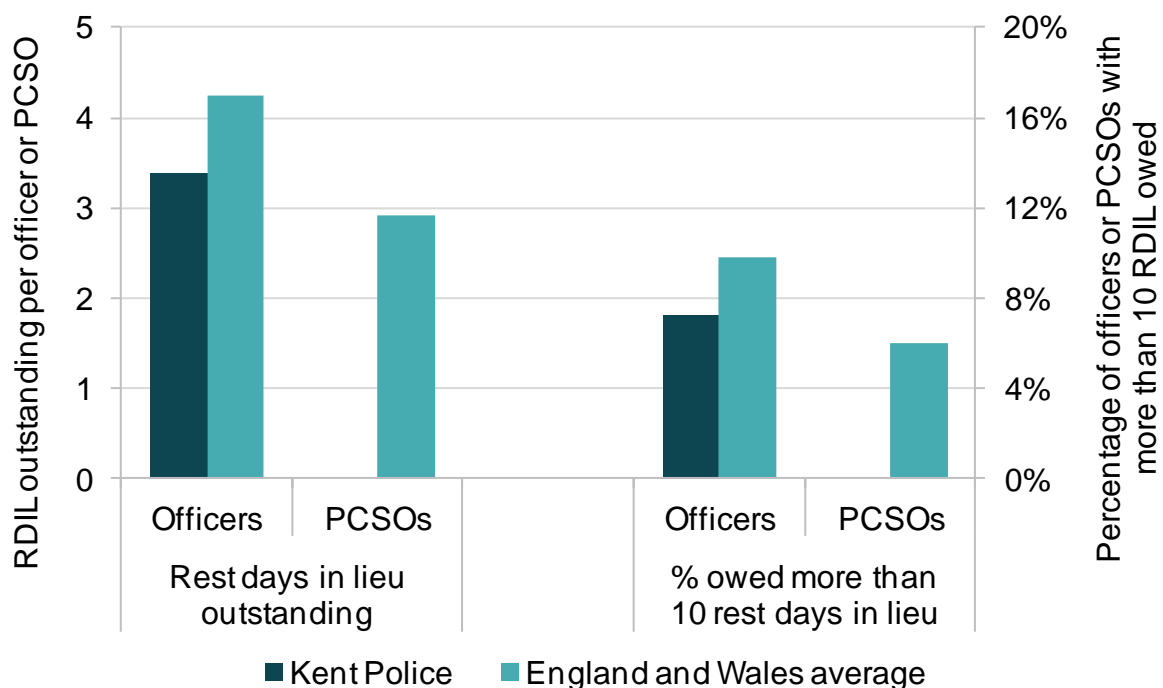
### **Understanding and valuing the benefits**

The force has a clear focus on wellbeing, which the workforce acknowledges. The force has retained an in-house occupational health unit. This is seen as a positive decision by the workforce because it provides quick access to its services which include a face-to-face contact option. There is also a comprehensive health and wellbeing development framework which details support and opportunities for all employees to maintain their health, wellbeing and safety. An example of this is a confidential, psycho-educational programme, 'Feel well, live well' that is available to all officers and staff. The four half-day sessions cover topics such as mental wellbeing, stress management, mindfulness, relaxation and time management. Supervisors have been given training to help them recognise and manage health issues including mental health issues. Staff reported that supervisors across the force comprehensively understand their wellbeing responsibilities and that they are well prepared and supported.

## 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. Analysis 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 Kent 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.

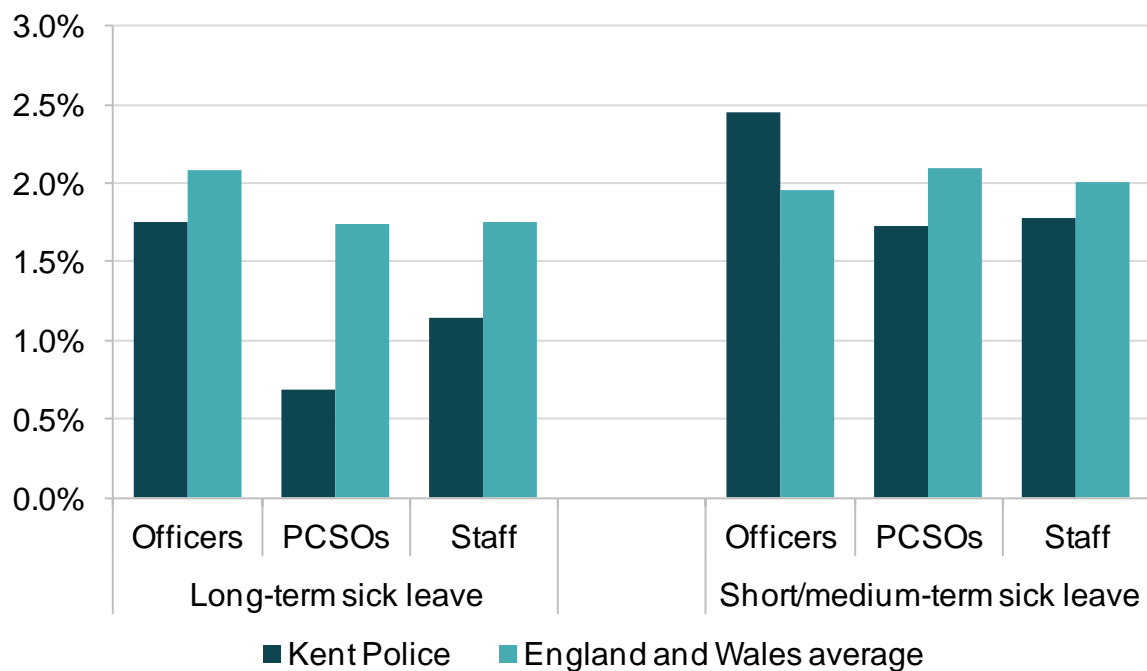
As at 31 March 2016, there were 3.4 rest days in lieu outstanding per officer in Kent Police, which was broadly in line with the England and Wales average of 4.2 days per officer. On the same date, there were no rest days in lieu outstanding per PCSO in the force, which was lower than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 7.2 percent of officers in Kent Police had more than 10 rest days in lieu owed to them, which was broadly in line with the England and Wales average of 9.8 percent. As at 31 March 2016, no PCSOs in Kent 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.



The force comprehensively understands the risks and threats to the wellbeing of its workforce and their causes, including a comprehensive and innovative focus on mental and emotional wellbeing. Staff associations described thorough canvassing of staff, which has allowed the force to have a very good understanding of the wellbeing needs of its workforce. The east division has health and wellbeing champions who provide advice and guidance to staff. Individuals with a disability are encouraged to make use of the services of Access to Work<sup>27</sup> to identify suitable reasonable adjustments, if required. The force is a member of the Business Disability Forum and uses this forum’s guidance and best practice to review and improve force policy and process. The force maintains strong and supportive management of welfare issues through its cultural boards, staff surveys and excellent signposting to services.

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 Kent 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.**

<sup>27</sup> Access to Work is a scheme run by Jobcentre Plus. The scheme provides practical support and advice for people with disabilities and employers to help overcome work-related obstacles resulting from a disability.

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

- 1.8 percent of officers were on long-term sick leave, which was broadly in line with the England and Wales average of 2.1 percent.
- 2.5 percent of officers were on short/medium-term sick leave, which was broadly in line with the England and Wales average of 2.0 percent.
- 0.7 percent of PCSOs were on long-term sick leave, which was lower than the England and Wales average of 1.7 percent.
- 1.7 percent of PCSOs were on short/medium-term sick leave, which was broadly in line with the England and Wales average of 2.1 percent.
- 1.1 percent of staff were on long-term sick leave, which was broadly in line with the England and Wales average of 1.7 percent.
- 1.8 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**

In HMIC's 2015 Legitimacy inspection we judged that Kent Police had a thorough understanding of the views of the workforce in respect of their wellbeing, and provided for the wellbeing of its officers and staff. This continues to be the case and the force is maintaining a comprehensive range of effective and sometimes innovative preventative measures to improve workforce wellbeing. Examples include the 'Feel well, live well' programme, designed specifically to develop individual resilience and wellbeing by equipping staff with strategies and tools to deal with everyday life and manage stress and anxiety either in the workplace or at home, and software called 'Read&Write Texthelp' which provides training sessions for those with dyslexia or who have reading and writing difficulties. The force's support forum reviews individual cases where there is particular concern about welfare. The purpose of this group is to provide a coherent approach to staff and officer welfare in order that the force can review risk effectively and allocate mitigating actions to local management. The performance improvement unit is a 'one-stop shop' for performance and attendance issues across the force for both officers and staff. The unit offers advice, guidance and support to supervisors and managers confronted with performance and attendance issues. The force ensures that special constables have access to all the wellbeing services that are available to regular officers.

## **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>28</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>29</sup>

### **The performance assessment process**

The force has well-established and effective personal performance management (PDR) arrangements. All officers and staff spoken to had active PDRs. Staff are supportive of the process and spoke of PDR as being “more meaningful now than before” because it better reflects the force’s culture. Officers reported that they hold regular one-to-one meetings with their managers about PDR and staff development more generally, and that there is a process to challenge the final grading of staff which is overseen by a senior manager. Staff use a 360-degree feedback process to obtain feedback from a broad range of colleagues. Extensive intranet pages include guidance on the PDR process and how to keep PDR accurate, relevant and comprehensive. The performance improvement unit (PIU) offers an excellent service whereby supervisors can request advice on performance and attendance issues. PIU advisers meet with supervisors to gain a detailed insight into the issues, and then work with supervisors to develop an improvement plan for the staff member. The PIU provides an effective means for the force to manage performance and attendance issues fairly and supportively.

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

The force has comprehensive and widely valued arrangements to encourage performance improvement, including the PDR process which staff see as fair and relevant. The force gives clear guidance to supervisors to ensure a fair and balanced approach to staff assessment and staff can dispute their assessment if they feel it is unfair or discriminatory. The PIU manages more difficult poor performance and attendance issues, and offers advice and guidance to supervisors dealing with poor performance. Staff and supervisors recognised this unit as being highly effective. Development opportunities are discussed during the PDR process. An example we

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<sup>28</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>29</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)

saw included a supervisor who sought and obtained an attachment with a domestic abuse support group in order to better understand the impact of domestic abuse and translate this learning to their own role. The 'Develop you' programme, which offers lateral development for all staff up to the rank of chief inspector or equivalent, has been taken up by staff and officers alike. At the time of our inspection, 90 officers and 38 staff members were on the programme.

## Summary of findings



### Outstanding

Kent Police is outstanding at treating its workforce with fairness and respect. Its use of its culture and ethics boards alongside open challenge forums, such as 'Ask the chief', has allowed it to quickly identify and act to improve the workforce's perceptions of fair and respectful treatment. The force has a comprehensive understanding of fairness issues, including grievances, complaints and misconduct matters, and uses this information to more effectively manage identified issues. The force consistently involves its workforce in decision making about wellbeing and ethical matters, and this clear focus on the wellbeing of officers and staff is recognised by the workforce and has a range of support mechanisms. Supervisors across the force have a comprehensive understanding of, and are well prepared and supported in, their wellbeing responsibilities. The force's PDR arrangements are well established and effective, and are supported by the workforce. This clearly demonstrates that the force treats its workforce with fairness and respect.

## 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: 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 1 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 2: 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>30</sup>

Data used in figure 2 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 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 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.

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<sup>30</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)



**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)