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# PEEL: Police legitimacy 2016

An inspection of the Metropolitan Police Service



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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 Metropolitan Police Service.

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

## Force in numbers



### Workforce

Total workforce as of 31 March 2016

**43,917**

Total workforce breakdown as of 31 March 2016



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

**16.3%**



Percentage of BAME in local population, 2011 Census

**40.2%**



### Gender diversity

Percentage of females in overall workforce 31 March 2016

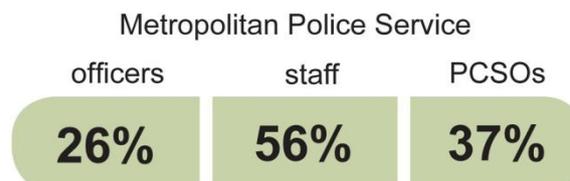
**34%**

Metropolitan Police Service

**51%**

England and Wales population, 2011 Census

Percentage of females by role 31 March 2016





## Public complaints

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

Officers

Metropolitan Police Service

England and Wales force average

**183**

**268**

Staff (including PCSOs)

**43**

**61**



## Grievances

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

Officers

Metropolitan Police Service

England and Wales force average

**2.6**

**4.8**

Staff (including PCSOs)

**5.3**

**6.8**



## Victim satisfaction

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

Metropolitan Police Service

England and Wales force average

**90.3%**

**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>



**Good**

The Metropolitan Police Service 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 legitimacy. The force works hard to ensure it treats all of the people it serves, and its workforce, with fairness and respect, but it needs to improve the way it ensures its workforce is behaving ethically and lawfully.

### Overall summary

The Metropolitan Police Service is working hard to ensure it treats all of the people it serves with fairness and respect. It understands the importance of this and how it affects public confidence in the force. The force has an engagement strategy and seeks feedback from the public, regularly reviewing results from the public attitude survey. Borough confidence plans help guide local community engagement activity, but not all officers we spoke with were aware of their local plan, and some survey results suggest more needs to be done.

The force requires improvement in ensuring that its workforce behaves ethically and lawfully. New recruits receive training based on the force's values, ethics and professionalism and the workforce is aware of the Code of Ethics and the force's values. The force has a vetting policy and procedure, but it carries out re-vetting based on business needs, which is not in line with the national policy. It clarifies and reinforces acceptable behaviour, and officers and staff are confident about reporting concerns to their supervisor. The force provides its workforce with awareness training about inappropriate relationships. However, the force recognises the abuse of authority for sexual gain as serious misconduct, as opposed to serious corruption, and does not have a counter-corruption strategic risk assessment or a control strategy. Further, the force does not actively seek intelligence on corrupt activities.

The Metropolitan Police Service is good in how it treats its workforce with fairness and respect. It uses a range of methods to identify and understand the areas affecting workforce perceptions of fair and respectful treatment. The force's review of its performance appraisal process reflected the workforce's dissatisfaction with it and

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

they have taken steps to improve it. The force has invested in wellbeing and comprehensive guidance is available on the force intranet. Supervisors receive training and told us that they are clear about their wellbeing responsibilities. However, inconsistency among supervisors in providing support to those who need it remains a problem for the force. The force is intent on improving wellbeing provision so it is more consistently applied.

## **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.
- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
- The force should improve how it clarifies and reinforces standards of behaviour to its workforce, particularly with regard to the abuse of authority for sexual gain, which should be recognised as a form of serious corruption.
- The force should ensure that its supervisors can recognise and provide support with wellbeing issues.
- 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

The Metropolitan Police Service has a good understanding of the importance of treating the people it serves with fairness and respect. The force’s organisational values of integrity, professionalism, courage and compassion support its vision to make London the safest global city. The force’s professionalism board raises the workforce’s awareness of the Code of Ethics and the force’s values, which are also available on the force intranet and displayed on posters in force buildings. Officers receive training on the Code of Ethics, in several ways, including through the National Centre for Applied Learning Technologies (NCALT) e-learning packages.

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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.*

However, officers and staff do not see this as an effective learning tool. Staff can access the NCALT modules but feel there is less emphasis on this training for them. Temporary members of staff do not have access to NCALT training. However, we found widespread knowledge of the Code of Ethics among people we spoke with across the force, which is in line with our 2015 legitimacy inspection.<sup>6</sup>

The force's promotion framework is underpinned by its values. It has developed assessments for each rank that are designed to test the values the force wants to see in its leaders. Online tools in the force's recruitment process test the values and behaviours that are important to policing in London. The certificate in knowledge and policing and the curriculum design team's foundation course (both for new recruits) are supported by the force's values, ethics and professionalism. However, colleagues of new recruits raised concerns about having to remind probationers about what is expected of them.

## **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.

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 the Metropolitan Police Service are 'other neglect or failure in duty' and 'incivility, impoliteness and intolerance'.<sup>7</sup> It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection;<sup>8</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.

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<sup>6</sup> *PEEL: Police legitimacy 2015 – An inspection of the Metropolitan Police Service*, HMIC, 2016. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015-metropolitan](http://www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015-metropolitan)

<sup>7</sup> Independent Police Complaints Commission data are available from: [www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data](http://www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data)

<sup>8</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/)

## **Seeking feedback and challenge**

The Metropolitan Police Service uses various ways to seek feedback from the public. An example of this is the public attitude survey designed by the Mayor's Office for Policing and Crime (MOPAC), which is carried out each quarter. The survey is based on the same methodology as the Crime Survey for England and Wales, but it surveys a larger population: a market research company conducts 12,800 face-to-face interviews throughout the year on behalf of the force. The survey measures public confidence in the force based on four principal factors affecting confidence: engagement; fair treatment; anti-social behaviour reduction; and crime reduction. The main factor is fair treatment. The force uses the results to inform its engagement activities and to measure their effect on fair treatment and the other confidence factors. It also has a scheme called Rate my PC, which invites the public to give feedback about the attitude and behaviour of individual constables they have contact with. Respondents complete and return a calling card that the constable attending an incident is required to leave with them.

The public can make general enquiries and give positive and negative feedback through the force's website, where they can also find a form and information about how to make a complaint, how complaints are handled and the appeals process. The force has a Twitter account that it uses to broadcast messages from the commissioner and to put out appeals. It has 478,000 followers. Each borough also has a Twitter account that broadcasts local news at ward level and any responses are replied to or passed on for action, as necessary. Officers receive training before they use their borough account to ensure that they use it appropriately.

The force introduced a 'listening campaign' to demonstrate to local communities that it is part of the community and is determined to tackle what matters to them. The campaign took place over three months, and the force used different activities to listen to 1 million Londoners who would not normally engage with it. The information the force gathered during the campaign helped it to better understand the communities that it serves, to help it improve engagement activity accordingly.

The force works with independent advisory groups that advise how the force's services may be, or are being, perceived by communities. The force seeks the groups' advice about critical incidents, major investigations and planned operations. Independent advisers help to ensure that these activities have the support of the community and that any community resources are identified. They may also be able to alert the force to any negative effects of proposed actions, thereby helping to prevent tension between the force and the communities it serves. The force publicises on its website how members of the public can join a local advisory group.

## Identifying and understanding the issues

The Metropolitan Police Service's engagement strategy was created in April 2015. The strategy is based on the MOPAC model of improving community confidence through engagement, fair treatment, anti-social behaviour reduction and crime reduction. The strategy sets out the force's objectives for improving engagement and the challenges that the force faces in doing this. The force-wide SHINE campaign (how an officer's introductory actions should be a smile, a handshake, an introduction, a name and to show empathy) aims to make sure that officers and staff are more open, friendly, approachable and engaging. The force understands the effect of fair and respectful treatment on public confidence. The MOPAC public attitude survey includes questions about fair treatment and respect, as well as about public confidence and trust. In the third quarter of 2015/16, the survey showed 89 percent of respondents agreed that the police in their area would treat them with respect if they had any contact with them,<sup>9</sup> with 75 percent saying that local police treat everyone fairly, regardless of who they are.<sup>10</sup> This was an increase of 1 percent compared with the same quarter in 2014/15 for both questions.

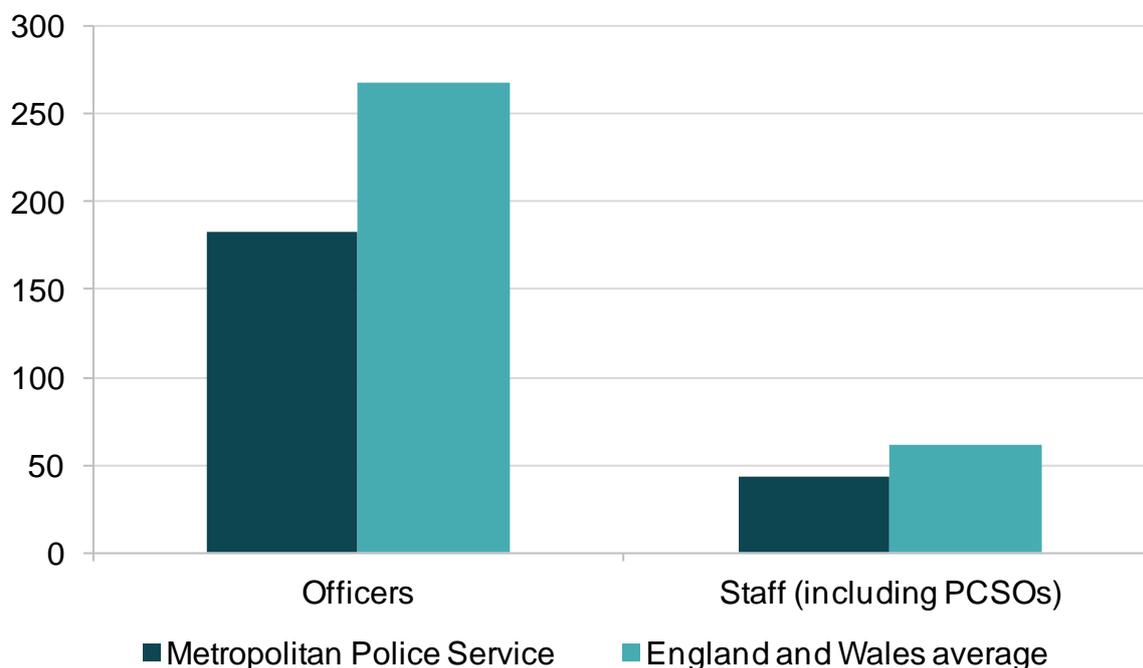
Each force in England and Wales is required to record the nature of complaint cases and allegations and be able to produce complaints data annually. The numbers and types of complaints are valuable sources of information for forces and can be used to help them identify areas of dissatisfaction with their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

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<sup>9</sup> *PAS MOPAC and MPS Quarterly Report, Quarter 3 (15/16) (Jan 15 – Dec 15) – MPS*, Opinion Research Services, January 2016, page 18.

<sup>10</sup> *Op. cit.*

**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 the Metropolitan Police Service compared with England and Wales, in the 12 months to 31 March 2016**



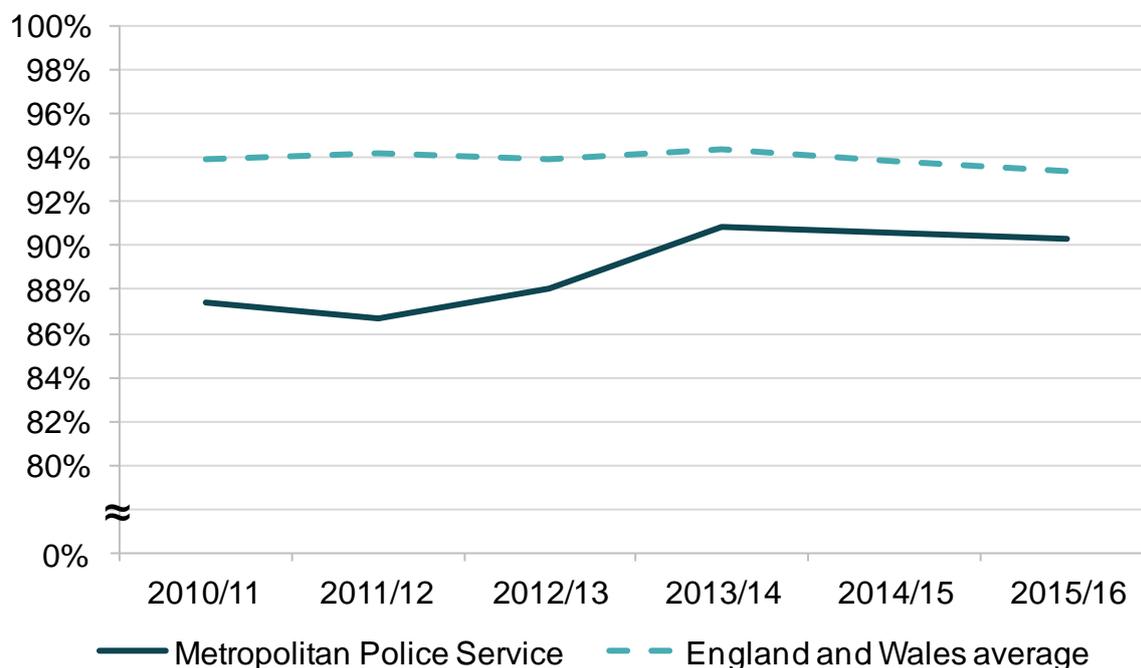
**Source: HMIC Legitimacy data collection**

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

In the 12 months to 31 March 2016, the Metropolitan Police Service recorded 183 public complaint cases per 1,000 officers, which was lower than the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 43 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).

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 the Metropolitan Police Service 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, 90.3 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by the Metropolitan Police Service, which was lower than the England and Wales average of 93.4 percent; and lower than the 90.6 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.

The force has begun a programme of activity based on the themes of the ‘listening campaign’. Each borough has developed a plan to improve the local community’s confidence in the police. These plans have four sections that address community concerns about fair treatment and the other confidence factors. In the six boroughs with the lowest confidence, the force’s lead for engagement has implemented a system of review. This involves a visit to the borough to provide support to the local senior leadership team with their confidence plan. Focus groups were also held with officers in these boroughs to see what issues they are facing regarding community engagement. The plans in these boroughs are regularly reviewed. When asked, not all officers in the boroughs we visited were aware of their local plan, even when it informs their work, such as in the neighbourhood policing team where community engagement is one of the main duties for officers and staff.

As well as independent advisory groups, each borough also has a safer neighbourhood group and a stop and search monitoring group to help members of the public to have a say on local policing. Every two years, MOPAC and the force

carry out a youth survey to measure confidence in the police among 11 to 18-year-olds across London. The factors for confidence in this survey include being treated with fairness and respect. When asked to what extent the police would treat them with fairness and respect if they came into contact with them, 11 to 12-year-olds held the best opinion: 78 percent of them either agreed or strongly agreed with this statement. This figure declines across older age groups, with only 58 percent of 17 to 18-year-olds agreeing or strongly agreeing with this statement. Those aged between 14 and 19 can also volunteer to become a Metropolitan Police cadet and become part of police work in London. The cadets are the most representative part of the force's policing family: currently 47 percent are female, 52 percent are from a black, Asian or minority ethnic community and 31 percent are considered to be vulnerable.

The force works with independent custody visitors (ICVs). These are volunteers who conduct unannounced visits to custody suites and visit detainees to ensure they are being treated properly. ICV reports in the force area have not raised any concerns about the force's treatment of detainees, or the attitude of the staff working in Met Detention (the force's new overarching police custody command, which became operational in January 2015). Before Met Detention, the force's custody suites were under the governance and resource of local borough commanders. Overall, visitors feel that there has been a marked improvement in this force-wide service since it has been brought together under one commander.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,<sup>11</sup> the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.<sup>12</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>13</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. We will publish our findings in early 2017.

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<sup>11</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>12</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>13</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/)

## **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 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**

The force has implemented its Rate my PC scheme in half of its boroughs. In one of these boroughs, a supervisor contacts all respondents who have expressed dissatisfaction following contact, to find out what the issues were and to provide feedback to the constable. The force's safer neighbourhood teams are in the process of setting up youth ward panels. These will be similar to the existing neighbourhood ward panels, except that the panel members will be young people rather than adults. The young people on these panels will be involved in setting policing priorities that matter to them, and will work with the police and wider community to resolve local issues.

The overall results of the force's public attitude survey are presented to the force's confidence board every quarter to identify any trends and ensure that action is taken if necessary. There are also borough-level confidence boards that perform the same function with the results for their area.

The force conducts 'big wing' days, which are days of concerted police action and engagement. It has developed them to include community action days with the aim of increasing community confidence in the police with a 'you said, we did' approach. So far, the force has held four community action days, each with a different theme:

- demonstration of the listening campaign;
- ward panels and partnership days;
- local promises and taking action; and
- 'you said, we did'.

As part of the listening campaign, borough commanders give fortnightly updates by blogging, to explain what the community has told them and what they have done in response. This is also used as an opportunity to increase the membership of neighbourhood ward panels. Newsletters are also used to keep local communities informed in the areas that they say matter to them.

The force has undertaken a review of the community engagement activities in the boroughs that have made the most progress with responding to community concerns about fair treatment and the other factors for confidence, and has published a report. As a result, each borough can see what works, and where, as well as get new ideas on how they can engage with their communities.

Each month, operational commanders are provided with management information about complaints so that they can look for any local trends and take appropriate action. The prevention and reduction team is part of the force's directorate of professional standards and oversees the complaints intervention scheme. The scheme highlights officers who have three or more complaints or allegations of misconduct made against them over a 12-month period; their supervisor is required to speak with the officer to see whether there are any issues and decide how best to deal with them. In some circumstances, officers are formally reminded of force policy on complaints or receive additional training and ongoing close supervision.

### **Demonstrating effectiveness**

The Metropolitan Police Service regularly and effectively engages with the public it serves. It responds well to public feedback and demonstrates that it is doing so. It has a good understanding of community concerns and works to respond to them. The listening campaign helped the force to listen to 1 million Londoners who would not normally engage with it. As a result the force identified communities that it had not been aware of in four boroughs, and who it can now work with. However, the force did not demonstrate that it understands which of its many initiatives are most effective at increasing the public's view of fair and respectful treatment.

## **Summary of findings**



**Good**

The Metropolitan Police Service works hard to ensure it treats all of the people it serves with fairness and respect. It understands the importance of doing so and how fairness and respect links to increased public confidence in the force. The results of the joint force and Mayor's Office for Police and Crime youth survey indicate there is more to do as only 58 percent of 17 to 18-year-olds agree that they would be treated fairly and with respect.

The force's organisational values of integrity, professionalism, courage and compassion support its vision to make London the safest global city. The professionalism board ensures workforce awareness of the Code of Ethics and the force's values; officers and staff we spoke to had a good understanding of the Code. New recruits are given training based on the force's values, ethics and professionalism.

The force has an engagement strategy and uses various ways to seek feedback from the public on matters such as fair treatment. The results and trends from the public attitude survey are reviewed quarterly. As part of the force's listening campaign, each borough has a confidence plan that helps to guide local community engagement activity, although not all officers we spoke to were aware of their local plan. The listening campaign helped the force identify communities of which it had been unaware, and can now work with.

## 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>14</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>15</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>16</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>14</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>15</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>16</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 Metropolitan Police Service vets all applicants to ensure that it recruits ethical officers, staff, volunteers and contractors. The force has a vetting policy and procedure, which sets out reasons for any deviations from the national police vetting policy. Some deviations are to support the force's ambition to better represent the communities it serves. HMIC considers this appropriate and is satisfied that the force is managing these risks satisfactorily. The force is awaiting confirmation of the College of Policing's new Authorised Professional Practice on vetting before it updates its own vetting policy. The force carries out re-vetting based on business needs, which is not in line with the national policy. This risk has been logged on the force's corporate risk register and is reviewed regularly.

The force understands how the vetting process may affect the recruitment of a diverse workforce. The force includes in its recruitment campaigns information about its vetting process, for instance stating that having a prior conviction may not stop an applicant but that all convictions must be declared. A recent recruitment campaign showed that black, Asian and minority ethnic candidates are more likely to fail the vetting process than their white counterparts. The force's vetting panel takes a risk-based approach to reviewing failed vetting applications: if the initial vetting decision changes, a marker is put against the applicant and they are monitored throughout their time in the force to ensure that there are no concerns.

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 Metropolitan Police Service clarifies and continues to reinforce acceptable standards of behaviour in a variety of ways; for example, at its regular events for senior leaders (chief superintendent and above and staff equivalents), 'extended' leaders (chief inspector and superintendent and staff equivalents) and team leaders (sergeants and inspectors and staff equivalents). We observed activity to reinforce this message, such as the work of the directorate of professional standards and the locally based professional standards champions, and the commissioner's blog and his regular staff briefings. The force provides officers and staff with information when someone has been disciplined as a result of misconduct.

The force provides officers and staff with training on the Code of Ethics and those we spoke with had good knowledge of it. The force's prevention and reduction team works with new recruits, promotion and special constable training programmes, which cover the Code of Ethics and emphasise the importance of ethical decision-

making. The team also provides briefings and awareness training about inappropriate relationships such as between officers and victims of domestic abuse. The force recognises the abuse of authority for sexual gain as serious misconduct and its starting point for allegations of this nature is to deal with them as such.

The force has a process for declaring business interests, notifiable associations and gifts and hospitality, and it provides officers and staff with guidance on the use of social media. Business interests and secondary employment are published on the force website. This is partly in line with one of the recommendations made in HMIC's 2014 police integrity and corruption report.<sup>17</sup> Three other recommendations are made in this report against which the force has made good progress. This is covered in more detail in the following section.

## **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>18</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**

An analyst in the Metropolitan Police Service's directorate of professional standards intelligence bureau provides intelligence to inform the National Crime Agency and its national threat assessment. However, the force does not have a force-specific counter-corruption strategic risk assessment or control strategy. We were told that a strategic risk assessment is being developed. The directorate of professional standards has a risk register that is reviewed as a standing agenda item at the

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<sup>17</sup> *Police integrity and corruption – Metropolitan Police Service*, HMIC, November 2014. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/)

<sup>18</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/)

monthly meeting of the department's senior leaders. Significant risks are escalated through the force's risk management processes to the risk and assurance board, which the deputy commissioner chairs.

Officers and staff understand the requirement to declare business interests and notifiable associations. Applications are cross-checked against other information held about applicants to see if this raises any concerns. The force carries out annual reviews as part of the performance development review process and officers and staff are required to review previous declarations. However, the force does not automatically complete follow-up checks if a business interest application is refused, but will do so if the risk is assessed as high. As recommended in HMIC's 2014 police integrity and corruption report, the force publishes business interests and secondary employment on its website. However, the expenses for chief officers and police staff equivalents are not published, although we also recommended this. Locally-based professional standards champions maintain the gifts and hospitality register; the list of gifts and hospitality offered to officers and staff is also published on the force's website.

The force can monitor its ICT system, phone and credit card usage, but it does not do this or scan for leaks to the media proactively. Its focus is on the high volume of actionable information coming into the directorate of professional standards' intelligence bureau. The force records ICT system use and investigators in the anti-corruption unit can cross-reference their intelligence with other employee information.

The National Police Chiefs' Council's national policy on vetting for the police community sets out the frequency with which re-vetting should be carried out. However, in re-vetting officers and staff on a business needs basis, the force does not currently comply with the national policy. This risk has been logged on the force's corporate risk register and is regularly reviewed by the risk and assurance board. Officers and staff are aware of the requirement to re-submit a vetting application after changes in their circumstances, such as moving home, and supervisors are aware of their responsibility to ensure that an application is submitted for enhanced vetting after a change of role if necessary.

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

Information about professional standards is available on the force's intranet. Its local professional standards champions meet every quarter to discuss issues and good practice, and to agree the messages about professional standards that will be communicated to the workforce. These meetings are attended by representatives from MOPAC and the Independent Police Complaints Commission (IPCC). As recommended in HMIC's 2014 police integrity and corruption report, the force gives guidance and training to senior officers who are responsible for assessing the severity of complaints to ensure that they take a consistent approach. Severity

assessments are reviewed at the quarterly meetings to see if there are any emerging trends that the force needs to address, such as an increase in changes to the initial assessment of a complaint.

The prevention and reduction team's work includes identifying the lessons learnt from complaints, investigations and IPCC and HMIC reports, and using this information to inform the content of staff briefings and training on corruption. The team audits complaints and misconduct cases to ensure that these have been ethically dealt with.

If any issues are noted the team will work with the local professional standards champion to establish what the issues are, and provide training and advice as necessary. The team also reviews complaints and misconduct data and has structured meetings with teams if trends are emerging to find reasons and to provide advice and support to reduce risk. For example, a trend was identified showing that a large number of the complaints being made about the force's territorial support group (TSG) were about incivility. The prevention and reduction team dip-sampled these cases to highlight the underlying issues, and then provided training and advice to the TSG on how to conduct stop and search encounters politely. This is as recommended in HMIC's 2014 police integrity and corruption report.

The performance analysis unit is also part of the force's directorate of professional standards. The unit produces regular reports setting out the lessons to be learnt from complaints and conduct matters, and sharing these across the organisation. The IPCC's 'Learning the lessons' bulletins summarise investigations that they or police forces have conducted, and where learning opportunities are identified. The performance analysis unit shares these bulletins with the professional standards champions for circulation to local teams. This too is as recommended in HMIC's 2014 police integrity and corruption report. The unit is also responsible for reporting to the IPCC on the actions that the force has taken in respect of complaints and misconduct matters.

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

The force does not proactively seek intelligence on potential corruption because it does not have the capacity to investigate all of the high volume of actionable intelligence from the public, informants and its own officers and staff it already receives. By not actively seeking intelligence on corruption, the force misses the opportunity to understand the scale of new corruption threats, such as the abuse of authority for sexual gain. This also means that the force is less likely to be able to demonstrate to officers and staff that this behaviour is corruption by publicising such cases. Potential sources not currently exploited by the force, and that could provide intelligence on officers abusing their authority for sexual gain, include women's refuges, sex worker support groups, websites and gyms. Officers and staff know that they can use the Rightline or Crimestoppers confidential reporting services to report any matters of concern, and the reporter of wrongdoing policy sets out the help and

support available to whistleblowers. Support is also available from officer and staff associations and networks. The officers and staff we spoke with said that they are confident about reporting concerns to their supervisor or manager.

The directorate of professional standards intelligence bureau assesses, develops and deals with corruption-related intelligence in line with the requirements of the National Intelligence Model<sup>19</sup>. After the development stage, an intelligence product is prepared that is passed to the appropriate unit or team in the directorate to progress the investigation. The force carries out random substance misuse testing and has a 'with cause' process, whereby testing is authorised by a senior leader in the directorate if an officer or member of police staff is suspected of misusing controlled substances. These processes are overseen by the directorate's serious misconduct investigations unit and the specialist investigations team respectively.

## **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>20</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>21</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>19</sup> The National Intelligence Model ("the Model") is a process used by police forces and other law enforcement bodies to provide focus to operational policing and to ensure resources are used to best effect. The Model is set out in a Code of Practice. *Code of Practice: National Intelligence Model*, Home Office, National Centre for Policing Excellence and Centrex, 2005, paragraph 3.1.1, page 6. Available at: <http://library.college.police.uk/docs/npia/NIM-Code-of-Practice.pdf>

<sup>20</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>21</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>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**

While the force takes the problem of abuse of authority for sexual gain seriously, it recognises it as a serious misconduct matter, as opposed to serious corruption. The starting point for allegations of this nature is to deal with cases as such, rather than immediately referring them to the IPCC.

The prevention and reduction team provides briefings and awareness training about inappropriate relationships. It actively encourages the reporting of any suspicions that an inappropriate relationship is developing and undertakes to investigate all allegations.

Officers and staff recognise that the abuse of authority for sexual gain is wrong; however, some said that they had not received the awareness training. If officers and staff are not aware of the signs to look out for, this could affect their ability to recognise matters of concern that should be reported.

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

The force does not actively seek intelligence of potential corruption from sources such as women's refuges, sex worker support groups, websites and gyms. The force's focus is on the high volume of usable information coming into the directorate of professional standards intelligence bureau regarding a wide range of corrupt activities. Information is received from the public and informants, and officers and staff via several sources including:

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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/)

- confidential reporting services;
- supervisors, managers and senior leaders;
- officer and staff associations and networks; and
- direct contact with the professional standards directorate.

Most allegations of abuse of authority for sexual gain are made by the victim or through a charity that supports sex workers. The force feels that this is a result of the growing confidence to make a report among victims of a sexual offence after several high-profile cases. We reviewed two live investigations of allegations, where the victims had come into contact with the accused as a result of suffering domestic abuse. The starting point for both investigations was that they are serious misconduct, with this being re-assessed as the investigation progressed.

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

The force's prevention and reduction team has grown in size from two to eight members of staff, allowing it to do more proactive work to raise awareness across the force about corruption, including the abuse of authority for sexual gain. The team draws information from sources such as the intelligence database, complaints, investigations and IPCC and HMIC reports, and uses it in staff briefings and training on corruption. Members of the team meet with the local professional standards champions on a monthly basis to discuss emerging threats of corruption, and to ensure that messages are being cascaded to local teams.

The team has produced a detailed presentation used at the professional standards development day, which highlights the Code of Ethics. The presentation includes a section on the abuse of power for sexual gain, making it clear that this is unacceptable and encouraging the reporting of any suspicions. It also mentions domestic abuse, although this is with regard to a force employee being the perpetrator rather than taking advantage of a victim of domestic abuse.

### **Building public trust**

The force recognises the importance of being open and accountable about allegations of wrong-doing by its officers and staff in order to maintain public confidence. It publishes the outcome of public misconduct hearings on its website, as well as via Twitter and in the press.

In both of the live investigations that we reviewed, we found that the force is taking a victim-centred approach from when the allegations were made and throughout the investigation. Good victim care was noted and the victims, one of whom was very vulnerable, were being regularly updated.

The force's directorate of media and communications has prepared written guidance setting out how media interest in complaints and discipline matters should be managed. It works closely with the directorate of professional standards to ensure that the information given to the media is appropriate but also reflects the nature of the misconduct.

## **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 professional standards section of the force's website contains information about who the directorate of professional standards are, the teams in the directorate, standards of professional behaviour, misconduct and misconduct hearings, public complaints and the IPCC. The force holds officer misconduct hearings in public, subject to a decision made by the person chairing the hearing to exclude any person from all or part of the hearing. Information about public misconduct hearings is easily accessible to the public. Listed public misconduct hearings and a booking form are available on the force's website. The force also publishes public misconduct hearing outcomes on its website, through Twitter and in the press.

The force's directorate of media and communications has prepared written guidance setting out how media interest in complaints and discipline matters should be managed. The directorate of professional standards regularly updates the College of Policing with details of officers who have been dismissed or who have resigned while under investigation (called 'disapproved officers').

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<sup>24</sup> *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## Working with the workforce

As recommended in HMIC's 2014 police integrity and corruption report, the force publishes detailed accounts of misconduct outcomes on the force intranet. The force's directorate of professional standards works with the internal communications team to ensure that the published details reflect the seriousness of the allegations that were upheld, and the consequences. This is done to reinforce the messages about unacceptable behaviours. In spite of this, the officers and staff we spoke with said that they only hear about cases that result in dismissal.

## Summary of findings



### Requires improvement

The Metropolitan Police Service requires improvement in ensuring that its workforce behaves ethically and lawfully. The force notes any deviations from the national police vetting policy and the reasons for them. The force takes a risk-based approach to reviewing failed vetting applications to assist in its objective to recruit staff that better reflect the diversity of the communities it serves. However, it carries out the re-vetting of officers and staff on a business-need basis, which means it does not comply with the national policy.

The force clarifies and continues to reinforce acceptable behaviours in a variety of ways. Officers and staff can use the confidential reporting service or Crimestoppers to report matters of concern, and are confident about reporting concerns to their supervisor or manager. The force has made good progress on the recommendations made in HMIC's 2014 police integrity and corruption report.<sup>25</sup> However, the directorate of professional standards does not have a counter-corruption strategic risk assessment or a control strategy and, because of a lack of investigative capacity, it does not actively seek intelligence on corrupt activities by the workforce.

The force recognises the abuse of authority for sexual gain as serious misconduct, as opposed to serious corruption. The force provides awareness training about inappropriate relationships, although some officers and staff said that they had not received the awareness training.

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<sup>25</sup> *Op. cit.*

### **Areas for improvement**

- The force should ensure it complies with all aspects of the current national guidelines for vetting.
- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
- The force should improve how it clarifies and reinforces standards of behaviour to its workforce, particularly with regard to the abuse of authority for sexual gain, which should be recognised as a form of serious corruption.

## 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>26</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 are 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>27</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

The Metropolitan Police Service uses a range of methods to identify the areas that have the greatest impact on workforce perceptions of fair and respectful treatment. This includes carrying out the 'Build a better Met' annual staff survey. Officers and staff are also able to share their views on the commissioner's forum on the intranet,

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<sup>26</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)  
*f 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)

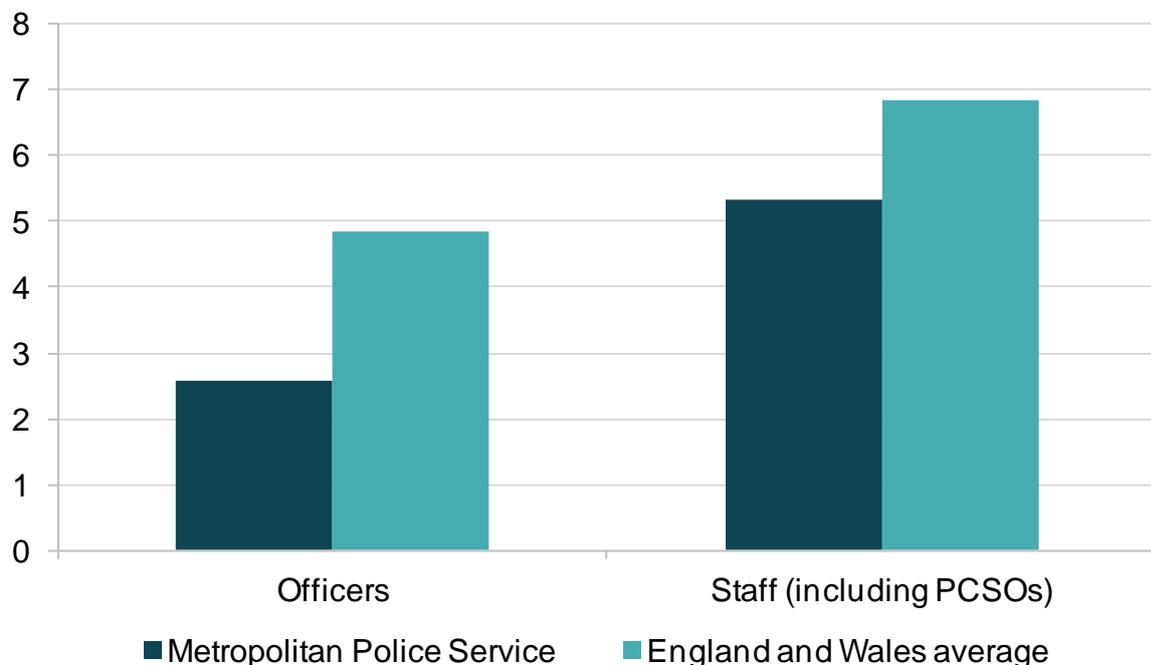
<sup>27</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

[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)  
*f*

and at his briefing and Q&A sessions, at leading for London events, during their local 'Met Conversation' sessions and during exit interviews. The 2015 staff survey was promoted by survey champions to increase the number of respondents. The force told us that this resulted in a survey response rate of 56 percent of the workforce, which is higher than the average response rate for police forces in England and Wales of 40 percent. Survey champions also promote the 2016 survey to replicate this success.

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 the Metropolitan Police Service 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, the Metropolitan Police Service finalised 2.6 formal grievances raised by officers per 1,000 officers, which was broadly in line with the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 5.3 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).

Officers and staff can also submit ideas for consideration. One example is the Rate my PC initiative, which was suggested by a probationer police constable and has now been implemented in half the boroughs in the force. The force has a scheme called the 'ideas factory', in which team leaders submit ideas and their colleagues vote for the ones that they would like to see put into practice.

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

The force feeds back staff survey results to officers and staff and invites them to submit their choices for resolution from the top ten priorities highlighted by the survey. It prepares a report for its professionalism board containing an update against the choices that respondents felt would most benefit them. The force carries out quarterly 'pulse surveys' to see if satisfaction has improved in the areas where it has taken action, rather than waiting a year until the next full survey. Most recently, based on feedback received on officer dissatisfaction, the force brought forward a review of the response team's change of shift pattern.

Despite the opportunities the workforce have to influence developments, the officers and staff we spoke with said that they do not feel listened to or valued, as also noted in our 2015 legitimacy report. This was a recurring theme among the people we spoke with, especially those who are managed remotely. Change management is a principal element of the force's change plans. Some 1,325 officers and staff have volunteered to be change ambassadors to help the force to make the cultural changes needed to ensure the workforce feel listened to and valued.

## **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 recognises that the nature of policing can pose physical and psychological risks to the health and wellbeing of its workforce and is committed to improving wellbeing provision.

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

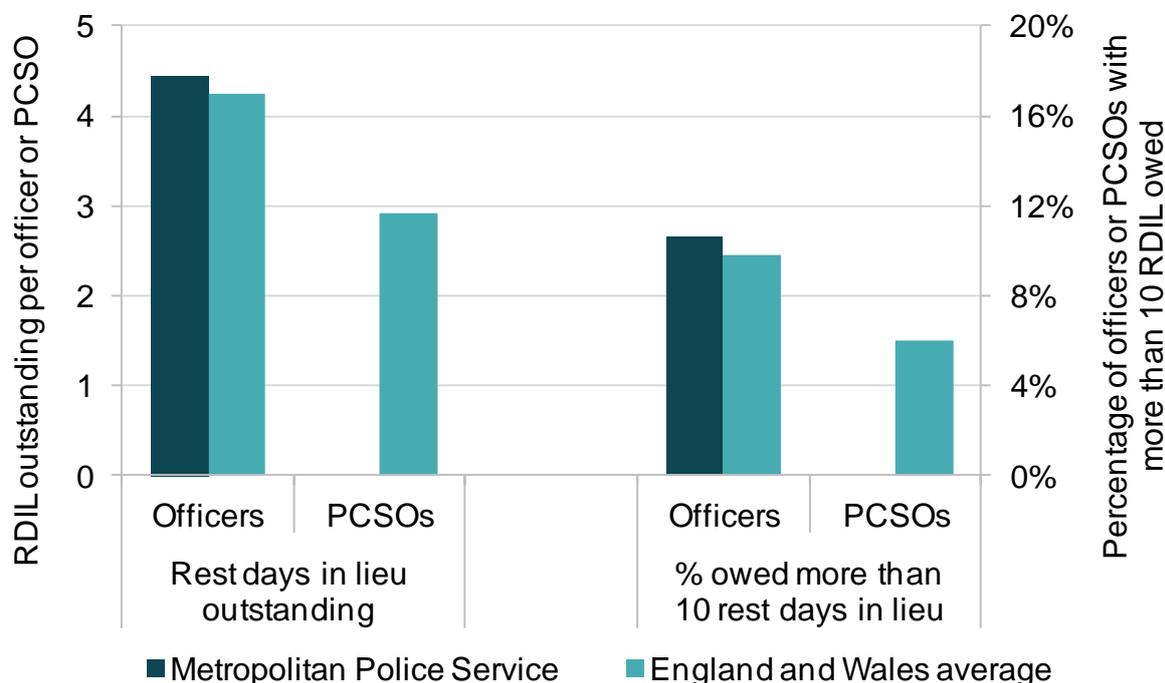
The force uses an operational health risk assessment process to identify, assess, monitor and help develop controls for health risks encountered in the workplace. This assessment uses five health hazard groupings and a shortlist of the health risks that may be encountered in particular roles. The results of the assessment are used to help create occupational health interventions for certain roles, such as those dealing with child abuse or sexual offences investigations.

A campaign called Wellbeing 100 included speakers from outside the organisation who did a presentation for supervisors on how to identify common indicators that may suggest someone is not coping.

Volunteers in the Metropolitan Special Constabulary are included in the staff survey. They can also participate in the Institute of Public Safety, Crime and Justice's national survey of special constables and police support volunteers. Their duty sheet system enables them to give feedback if they feel that they are not being used to best effect, or if they have any wellbeing concerns. Special constables' hours are monitored; if their hours reduce, their line manager will discuss this with them to see if wellbeing is an issue. If a special constable hands in his or her notice, the specials retention team checks to establish the reason for this and works with the special and the special's supervisor to resolve any concerns.

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 the Metropolitan Police Service compared with England and Wales, as at 31 March 2016**



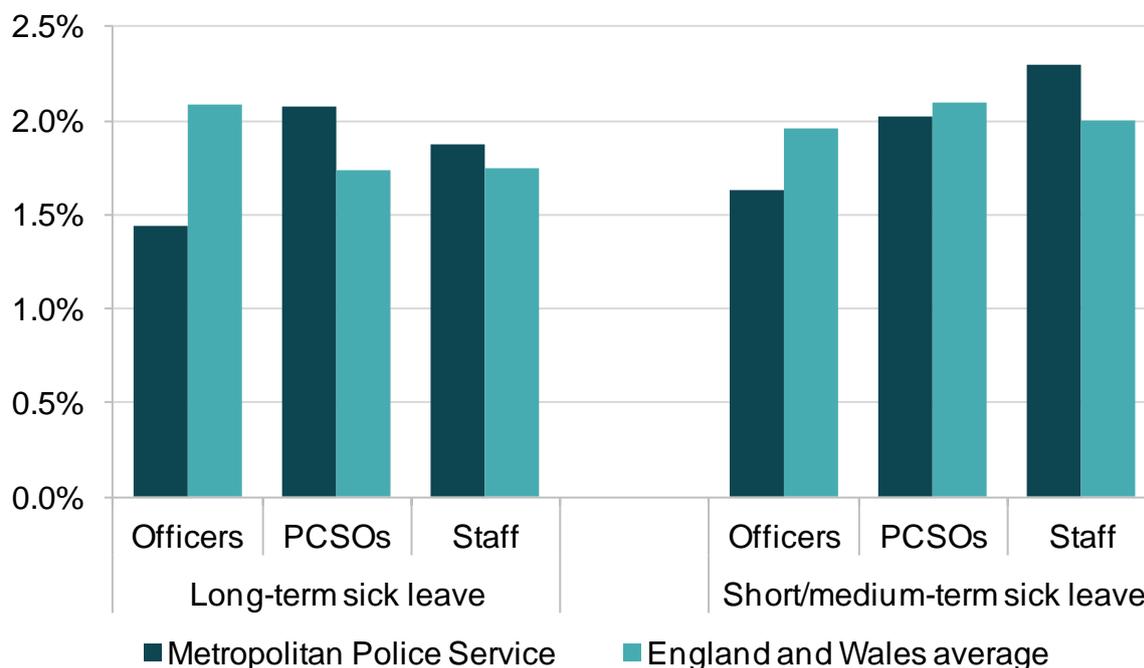
**Source: HMIC Legitimacy data collection**

**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 4.4 rest days in lieu outstanding per officer in the Metropolitan Police Service, which was broadly in line with the England and Wales average of 4.2 days per officer. The Metropolitan Police Service could not provide data for rest days in lieu outstanding for PCSOs as at 31 March 2016, because they do not record this information. On the same date, the England and Wales average was 2.9 rest days in lieu outstanding per PCSO. As at 31 March 2016, 10.6 percent of officers in the Metropolitan Police Service 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. The Metropolitan Police Service could not provide data for the percentage of PCSOs owed more than 10 rest days in lieu as at 31 March 2016 because it does not record this information. The England and Wales average was 6.0 percent of PCSOs.

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 the Metropolitan Police Service 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.

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

Comprehensive guidance is available on the force's intranet about wellbeing, including the 'In despair' button that links to information helpful for those experiencing difficulties. Officers and staff told us that they know where to look for wellbeing information.

The force signed up to the Blue Light pledge in February 2016 to support the mental health and wellbeing of its workforce and provides details of the Blue Light programme, which takes self- or third-party referrals, on its intranet. The force also runs drug and dependency campaigns to encourage officers and staff to seek help and support if they need it.

Operation Hampshire is a force initiative on assaults on officers and staff in the course of their duties to improve prevention, investigation and welfare response. The principles of this operation are fully supported by the officer federation and staff union.

Managing the welfare of officers and staff is the responsibility of individual managers and supervisors. Managers and supervisors receive training in HR matters, which includes wellbeing, and those we asked said that they are clear about their responsibilities.

Officers and staff feel that there is a commitment to wellbeing at a senior level in the organisation, but generally feel that more could be done at an operational level to address wellbeing issues. When we explored this concern we found that the issue was an inconsistent approach by supervisors. This has not improved since the 2015 legitimacy inspection. Those who have been referred to occupational health said that following triage and an initial phone conversation there were delays in moving to the next stage of the service. However, once seen those who had used the service said it was very good. The force is in the process of outsourcing its occupational health provision to reduce delays, improve the service and gain greater value.

The force provides good care for its staff investigating child abuse in specialist pan-London teams, by providing regular psychometric testing and health screening. The force regularly assesses roles for psychological health risks. Those it assesses as high and medium risk are subject to six-to-twelve-monthly face-to-face psychological assessment. The force sees this as of particular importance for those roles where officers are posted overseas for extended periods undertaking tasks such as victim identification involving mass casualties. The force has unveiled a new peer ambassador scheme in which psychological support and welfare is promoted by volunteer ambassadors within high-risk operational units.

## 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

Supervisors and managers are required to complete an annual performance development review for the officers and staff that they line manage. The purpose of the review is to assess an individual's performance against their current role and determine development opportunities that could lead to improved performance. It should also be used to enable line managers to support officers and staff in working towards reaching their full potential, including in respect of upwards or sideways career progression.

The force provides detailed guidance to support its workforce through the performance review process. In our 2015 inspection we found that most officers and staff we spoke with had a negative opinion of the force's system and that they did not see it as serving its purpose but rather as a 'tick box exercise' which was completed for compliance purposes. Since then the force has taken steps to improve their performance appraisal system with a new system being piloted in 2016. This change will take many months to implement fully among its officers and staff.

We still found that many people we spoke with this year said that they did not have regular performance conversations throughout the year leading up to their review, and that how the review itself is carried out depends on the supervisor or manager involved. The force must make progress quickly to address these issues as they call into question the fairness of the force's current performance review process.

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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%20FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_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)

## **The results of performance assessment**

The force recognises that its performance development review system is not effective. An internal review was heavily critical of the current process. The force has used the findings from its internal review and research from other organisations to design the '3 As' performance development review process (for officers from constable to inspector ranks) based on aspirations, achievements and abilities. The force consulted with the Metropolitan Police Service Federation and the local branch of the Police Superintendents' Association of England and Wales during the development phase. The pilot started in May 2016. The force intends to use the pilot to assess whether the '3As' process may discriminate against officers with protected characteristics (such as age, gender or disability). At the time of our inspection, implementation of the '3 As' for officers was due to start in September 2016, after it has been evaluated. The force is currently trialling it with police staff and will consider wider implementation after evaluating the pilot. In the meantime, the force is providing guidance to supervisors under the leadership development programme to assist them with carrying out fair and effective appraisals, because this was one of the issues highlighted in the internal review.

The performance of officers at chief inspector rank and above, including those of National Police Chief Council's rank, is assessed using the force's 'performance and potential' matrix. The matrix aims to help the force to gain a more consistent view of the capability and future potential across the organisation. It also assesses how well these officers demonstrate the forces' values. Line managers are encouraged to have more open and honest conversations with their line reports in respect of their performance, potential and development. The force has sought feedback from the officers who undergo this process and this showed that performance conversations between individuals and their line manager are now happening.

The force also participated in the College of Policing's 'defining and assessing competency' pilot with seven other forces. The pilot began in 2012 with the aim of introducing competence threshold assessments linked to pay. The pilot tested the design and feasibility of an evidence-based process that would enable constable competence to be assessed at specific points and then every five years thereafter. The new framework that was developed after the pilot (called the assessment and recognition of competence) applies to constables who are approaching pay point 4. If constables do not achieve at least 'good' in their performance development review, or fail to provide evidence that demonstrates competence in their role they will not progress to pay point 4.

## Summary of findings



**Good**

The Metropolitan Police Service is good at treating its workforce with fairness and respect. It uses a range of methods to identify and understand the areas that have the greatest impact on workforce perceptions and takes action to address these. The force's review of its performance appraisal process reflected the workforce's dissatisfaction with it.

The force is intent on improving the performance appraisal process for the workforce. The pilot in May 2016 was still to be evaluated at the time of our inspection but, if positive, a new process will be implemented across the force to improve performance and fairness.

The force uses operational health risk assessments to help develop wellbeing controls in certain roles. We found that provision of psychological support in high-risk roles was very good. Comprehensive guidance on wellbeing is available on the force intranet and the force runs campaigns covering different wellbeing issues. Supervisors receive training and told us that they understand clearly their wellbeing responsibilities. However, inconsistency among supervisors in providing support to those who need it remains a problem for the force. The force is intent on improving wellbeing provision so it is more consistently applied and the new performance appraisal process is a significant step forward in improving performance and fairness.

### **Areas for improvement**

- The force should ensure that its supervisors can recognise and provide support with wellbeing issues.
- 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>30</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

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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)

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 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)