

PEEL: Police legitimacy (including leadership) 2017

An inspection of Dyfed-Powys Police



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Introduction

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

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

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

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

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

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

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

³ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

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

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

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

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

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

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

Force in numbers



Workforce

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

1,925

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

officers

1,160

staff (including section 38)

622

PCSOs

143



Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

1.0%

officers

0.9%

staff

0.7%

PCSOs

3.0%

Percentage of BAME in local population, 2011 Census

2.0%



Gender diversity

Percentage of females in overall workforce 31 March 2017

41%

England and Wales population, 2015 estimate

51%

Percentage of females by role 31 March 2017

31%

Dyfed-Powys Police

officers

staff

PCSOs

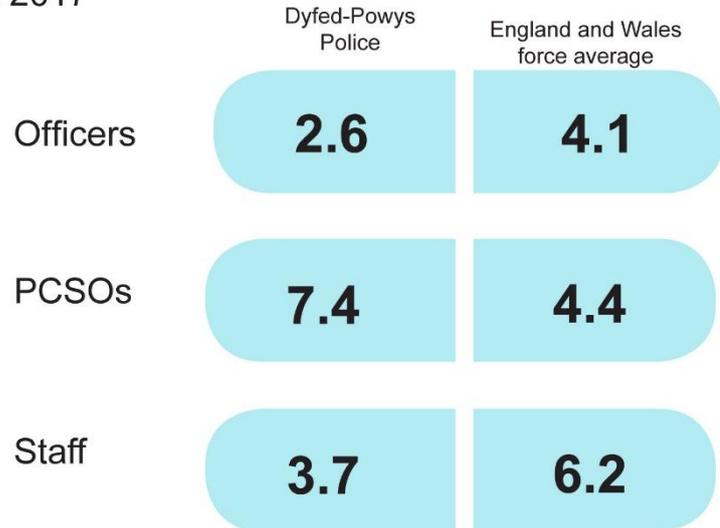
59%

49%



Grievances

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

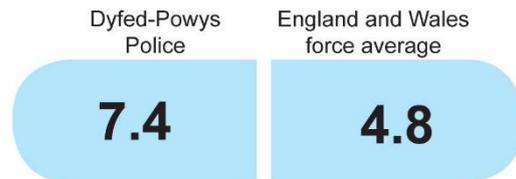


Stop and search

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

3,810

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



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

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

Overall judgment⁴



Dyfed-Powys Police is judged to be good at how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we looked at this year, our overall judgment is more positive than last year. The force is judged to be good at treating all of the people it serves with fairness and respect and at ensuring its workforce behaves ethically and lawfully. However, it is judged to require improvement in some aspects of treating its workforce with fairness and respect.

Overall summary

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



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



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



Dyfed-Powys Police is judged to be good overall in respect of how legitimate the force is at keeping people safe and reducing crime. HMICFRS is pleased to see that the force has acted on most of our previous recommendations for improvement. Its leaders have shown a real commitment to ensuring that the workforce understands the importance of treating the people it serves fairly and with respect. Officers and staff understand unconscious bias and use coercive powers well. Good communication skills are being delivered to some of the workforce. Although the force has good arrangements in place to scrutinise its use of powers, and welcomes challenge to improve the way that it treats people, more must be done to ensure that its external scrutiny is truly representative of the communities it serves. The force also needs to improve its recording of stop and search information.

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

Dyfed-Powys Police can demonstrate that it has an ethical culture, which helps the workforce to behave ethically and lawfully. The force is also good at identifying, responding to and investigating cases of discrimination. It is easy for members of the public to complain if they feel they have not received the level of service to which they are entitled but the force needs to do more to update both complainants and those subject to complaints. Although the force has failed to reduce the backlog of vetting cases identified by HMICFRS in 2016, we are satisfied the force's plan to resolve this problem by 2019 is realistic and achievable. The force is actively promoting healthy lifestyles by providing support to those who need it. However, the force needs to do more to encourage black, Asian and minority ethnic (BAME) representation, by recruiting, retaining and promoting officers and staff who are representative of the local population. It should also ensure that everyone benefits from the new annual appraisal process, and that all officers and staff understand and fully support the promotion and selection processes.

Areas for improvement

- The force should ensure that officers and supervisors likely to use stop and search powers understand what constitutes reasonable grounds.
- The force should ensure it has external scrutiny groups at force and local levels, which should have a diverse membership that represents all communities, including young people. Members should also receive sufficient training to be able to challenge leaders with confidence.
- The force should ensure it complies with all aspects of national guidelines for vetting; the backlog of cases that require vetting should be reduced immediately.
- The force should improve the quality and timeliness of updates to complainants, in line with IPCC statutory guidance.
- The force should ensure that all officers and staff receiving and investigating public complaints have the appropriate knowledge and skills to support people who may want to make a complaint, especially those who require additional assistance.
- The force should ensure that its grievance procedures are accessible and transparent, and are perceived by the workforce as being fair.
- The force should ensure that it has effective processes in place to identify and understand the causes of potential disproportionality in the recruitment, retention and progression of its workforce, and to take effective action to address these causes.

- The force should ensure it has effective systems, processes and guidance in place to manage individual performance.
- The force should ensure that its promotion and selection processes are accessible and transparent, and are perceived by the workforce as fair.

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

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

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

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

HMICFRS assessed the extent to which leaders of the force understand the importance of procedural justice, and the arrangements they have made to provide the workforce with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. We examined the workforce’s understanding of the principles of procedural justice (being friendly and approachable, treating people with respect, making fair decisions, and taking time to explain these decisions). We did this by checking their understanding of the concept of unconscious bias,⁶ their awareness of effective communication skills⁷ in all

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

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

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

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

Understanding the importance of treating people with fairness and respect

The force understands the importance of treating people with fairness and respect. Its leaders highlight the benefits of procedural justice and uphold the importance of treating people fairly and with respect consistently. The force has built its values around the need to treat people with fairness, selflessness, integrity, honesty, objectivity and respect – values that match the College of Policing’s Code of Ethics⁹. Force leaders expect staff to display these values in their work. Training that covers the force’s values and Code of Ethics reinforces the need to treat people with fairness and respect. Data drawn from the Crime Survey of England and Wales, up to the end of March 2016, ranked Dyfed-Powys Police first out of all police forces in England and Wales in terms of whether or not the force is doing a ‘good’ or ‘excellent’ job; 72 percent of respondents to the survey answered that the force was doing ‘a good or excellent job’. The positive approach that leaders take means members of the public are more likely to receive treatment that they see as fair and respectful. Our findings this year are consistent with last year’s Legitimacy inspection, when we found that Dyfed-Powys Police was good at treating all of the people it serves with fairness and respect.

Understanding of unconscious bias

The workforce has a good understanding of unconscious bias. At the time of the inspection, not all members of the workforce had received individual training in unconscious bias, for example, some police community support officers (PCSOs). However, all officers and staff in the force have received some form of training, guidance or support that covered unconscious bias. All frontline officers have received the College of Policing’s stop and search training package, which covers unconscious bias training in detail. HMICFRS was pleased to see advanced plans in place designed to ensure that all officers and staff receive specific training in unconscious bias by the end of 2017. The officers and staff we spoke to could articulate the need to act and make fair decisions and seemed mindful of the need to

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

⁹ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

avoid stereotyping, prejudice and discrimination. They were aware of their own biases, of how these could affect their decisions, and of how to take steps to correct these negative influences. Most officers and staff felt that these personal qualities were already well understood – as a consequence of their professional pride rather than as a consequence of receiving training in unconscious bias. However, the additional training described above should supplement this understanding and be encouraged.

Communication skills

Dyfed-Powys Police provides training in good communication skills. However, it needs to put more emphasis on active listening techniques, particularly for officers who come into contact with the public regularly. At present, officers receive training in communication skills during their personal safety training courses. However, this covers tactical communication skills – and these differ subtly from the active listening, empathy and explanation skills needed in everyday interactions with the public. These build up trust and confidence in the police. Not all the officers we spoke to remembered receiving training in communication skills. Some also did not know how to develop these skills further. On a positive note, a number of courses deal with the importance of communicating effectively. For example, leadership courses for officers and staff (who come into contact with the public) explore effective communication that focuses on people with mental health illnesses, autism and dementia. These courses discuss the importance of body language, use of words, tone of voice and posture – and how to adapt these to suit different personalities and situations. Social media training, which most officers and staff have undertaken, also covers good communication skills. All officers and staff should receive this level of training, and the link between good communication skills and police legitimacy should be clearly understood. Police will then speak to those members of the public with whom they come into contact to in a way that the public perceives as fair and respectful.

Use of coercive powers

The officers we spoke to in Dyfed-Powys Police understand how to use their coercive powers fairly and respectfully. All officers receive mandatory training in the use of coercive powers. They receive this as part of their probationer and annual personal safety training. This refers to the national decision model on the use of force and on how to resolve situations without the use of coercive powers. Officers receive training on using force fairly – and on using it only to the extent that is necessary, proportionate and reasonable in all circumstances, in line with the Code of Ethics. Training takes into account factors such as age, ethnicity and people's vulnerabilities. For example, it takes account of when they are intoxicated. The force uses the most recent College of Policing stop and search package. This contains extensive references to Authorised Professional Practice, the abuse of powers and reasonable grounds for the use of force.

Officers understand how to use force fairly and with respect. They are aware also of the need to complete a 'use of force' form following each incident that involves the use of force. However, our recent custody inspection indicates that force used in custody is not always recorded effectively. Officers that HMICFRS spoke to understood that, when they arrest people, they must be fair, respectful and not discriminate. They were aware also that their actions must be fully justifiable, and that when they exercise the power of arrest, they should consider the use of alternative and less intrusive options to resolve the situation.

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

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we examined in PEEL 2015: the use of force¹⁰ and stop and search powers. Specifically, we inspected the extent to which forces record data and how well they scrutinise data and other information, including through external scrutiny,¹¹ to understand and improve the use of these powers. In the case of stop and search, the next section sets out our findings. It includes our assessment of the reasonableness of recorded grounds for stop and search.

Scrutiny of use of force to improve treatment

Dyfed-Powys Police has good arrangements to scrutinise recorded data on the use of force in order to improve treatment of the public. It is able to record all types of use of force in accordance with the National Police Chiefs' Council (NPCC's) national recording requirements. However, the findings of our recent custody inspection indicate that, where force is used in custody, it is not always recorded. The force has a number of processes in place that regularly review and analyse data in relation to the use of force, including where body-worn video (BWV) has been used. This gives a good understanding of how effectively and reasonably its staff use force.

¹⁰ In 2015 HMICFRS found a generally positive picture of force oversight arrangements for use of Taser. However, in 2016, we found that many forces did not have similar levels of oversight for other types of use of force. As a result of a review undertaken by the National Police Chiefs' Council, all forces have been required to collect a minimum data set in respect of use of force since April 2017. The review is available at: www.npcc.police.uk/documents/uniformed/2016/Use%20of%20Force%20Data%20Report%20to%20Home%20Sec.pdf. Also see *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/

¹¹ *Independent Advisory Groups: considerations and advice for the police service on the recruitment, role and value of IAGs*, College of Policing, 2015. Available at: www.college.police.uk/What-we-do/Support/Equality/Documents/Independent_advisory_groups_advice_2015.pdf

A designated superintendent chairs the use of force group (UoFG) which examines the use of all types of force at a strategic level. The force uses these data to identify unfairness, or good practice, make improvements and share learning. The UoFG submits a report to the operations board and to the PCC through the strategic executive board on any matters concerning the use of force by officers. BCU commanders within the force receive feedback drawn from an audit of reports. When problems are spotted, line managers examine the use of force forms with the relevant officers. If they identify geographical or individual trends, the BCU superintendent is informed.

The independent advisory group (IAG) looks at a sample of BWV footage at quarterly meetings, and the results are discussed with senior police officers and the UoFG but viewing BWV is not a regular agenda item. However, this technology is relatively new to the force and the learning benefits are still being evaluated. Nevertheless, BWV is used during personal safety training to highlight good and bad practice and to share learning throughout the force. Force policy dictates the use of BWV in all cases of domestic abuse, stop and search and use of force. However, we found that not all officers used BWV in these circumstances. The force, therefore, should take steps to ensure all officers understand the force's BWV policy and use video recording in line with force policy. In 2015, HMICFRS found that while officers used Taser fairly and appropriately, some officers were not completing the Taser use of force forms correctly. We found that supervisors now review all cases where force has been used, including Taser. Mistakes found in the recording of use of force thereby are identified and corrected quickly. HMICFRS also found that Taser-trained officers use the National Decision Model (NDM) when recording their decision to use Taser in line with the training provided. This is encouraging progress compared to 2015.

External scrutiny to improve treatment

Dyfed-Powys Police needs to enhance external scrutiny to improve its treatment of the public. The force has an IAG. Independently chaired, its 12 members have some knowledge of the groups and communities living in Dyfed-Powys, although at the time of the inspection three of these members were unable to attend. Membership and representation is considered annually, and recruitment is encouraged throughout the year. The process of applying to join is clear and accessible. However, HMICFRS found that young people are not represented on the IAG, nor do the members speak on behalf of specific community groups. This means that while IAG members may have some knowledge of matters that most concern local people, they may not always be in a position to represent specific groups, or be seen to be acting in those groups' best interests. This is particularly true of young people. Furthermore, the IAG operates only at force level. There are no local IAGs representing the views of local communities across all of the force area. HMICFRS also found the training for IAG members was limited to data protection. Only those involved in scrutinising stop and search data had received specific guidance

involving legislation on the use of force. The force needs to improve the recruitment and training of IAG members to encourage a more diverse range of applicants who can effectively assess whether Dyfed-Powys Police is treating all the people it serves with fairness and respect.

More positively, we were pleased to find that senior officers engage regularly with the IAG. HMICFRS also saw evidence that the IAG was challenging the force on a range of matters, and that the members receive regular updates. For example, the IAG was reviewing the use of force quarterly, using BWV evidence and other data sources. IAG members have also been invited to comment on policies and documents such as the strategic equality plan. They have also contributed to the introduction of a non-emergency text messaging system and to processes designed to make it easier for people with hearing difficulties to contact the police. However, despite these positive developments, the force still is not making best use of its IAG to improve its treatment of people. This is because the IAG is not yet sufficiently representative of all the communities it serves.

The force does encourage external scrutiny and challenge through a number of other forums, however. For example, membership of the out of court scrutiny panel (OoCSP) is drawn from the IAG, the office of the police and crime commissioner, the Crown Prosecution Service and the judiciary system. This panel meets quarterly to provide independent scrutiny of offences that have been dealt with outside the court system. These include cautions and adult community resolutions. Another forum is the quality assurance panel (QAP), a group of volunteers who dip-sample calls made to the police, complaint cases and dissatisfaction records. Its members provide independent feedback to help the force improve the service it offers vulnerable members of the public. Both the OoCSP and QAP report back to the police accountability board (PAB), a public forum chaired by the PCC. We were pleased to find that these external scrutiny systems have exerted an influence on force policy. For example, as a result of OoCSP involvement, the force has changed the way it deals with young people suspected of committing sexual offences.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive available to the police. Their disproportionate use in respect of black, Asian and

minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.¹²

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.¹³ Our 2015 legitimacy inspection¹⁴ found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.¹⁵ Also, we assessed how the forces scrutinise use of these powers.

Understanding of national guidance

We found that while the officers we spoke to could articulate reasonable grounds for use of stop and search, some still lacked an adequate understanding of the most recent national guidance on the use of stop and search powers. Officers who use these powers receive training and guidance on how to use them fairly and respectfully and on how to use the NDM and the Code of Ethics when making decisions. The College of Policing's new stop and search package contains references to Authorised Professional Practice (APP), the abuse of powers and reasonable grounds for the use of the powers. By the end of 2017 it is expected that all staff will have received this package. At the time of the inspection, all frontline staff had received stop and search training as a result of completing existing online e-learning, or through face-to-face training delivered as part of annual personal safety training. Officers we spoke to were able to explain when reasonable grounds exist for a stop and search. Equally importantly, they were able to explain when grounds are not reasonable. However, in our review of 200 stop and search records we found that some officers still did not have reasonable grounds recorded (see reasonable grounds for the use of stop and search, section below).

¹² *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

¹³ *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available at: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/ and *Best Use of Stop and Search revisits*, HMIC, September 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/best-use-of-stop-and-search-revisits/

¹⁴ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

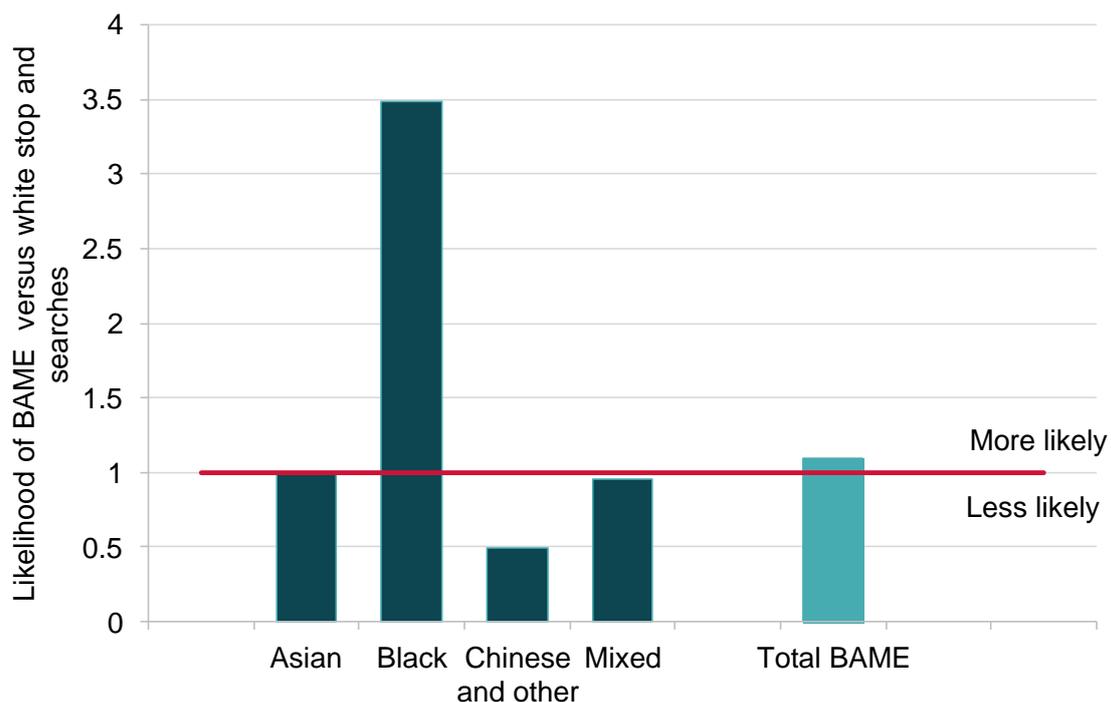
¹⁵ See annex A for more information about the methodology for our review of stop and search records.

Despite considerable investment in training, this suggests that some officers and supervisors still do not understand how to record stop and search encounters correctly (see also below, on reasonable grounds for use of stop and search).

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16 in the local population of Dyfed-Powys Police, BAME people were as likely to be stopped and searched as white people. Black people were 3.5 times more likely to be stopped and searched than white people, which is the greatest difference in any ethnic group in the force area when looking at the likelihood of being stopped and searched compared with white people.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)¹⁶ compared with white people, in the local population of Dyfed-Powys Police in the 12 months to 31 March 2016



Source: Home Office 2016

¹⁶ Police and Criminal Evidence Act 1984. Available at: www.legislation.gov.uk/ukpga/1984/60/section/1

Dyfed-Powys Police is good at monitoring the use of stop and search powers to improve its treatment of the public. It also understands the relationship between factors such as age, gender and membership of BAME communities – and the number of stop and search encounters that resulted in arrests linked to the original reason for the search. A number of boards and groups examine and monitor stop and search data regularly, including BWV footage. Since March 2017, all stop and search data have been reviewed internally each week. The results are then sent to local divisional senior leader teams (SLTs) to improve individual performance and ensure overall compliance with stop and search recording practices. The SLTs manage individual and area performance, and any lessons drawn from these stop and search data are shared at daily management meetings. This enables the force to identify local and regional trends at a strategic level. For example, the force is aware that BAME people are more likely to be stopped than white people. It attributes this trend to the transient nature of its population during the summer, when more non-resident BAME people visit the area. Every two months inspectors are required to conduct a dip sample audit of 30 per cent of the stop and search records completed over the previous two months within their area of responsibility. As part of their audit, they must assess whether the grounds for the search were fully documented and meet the standards of a fair and effective search. This standard is defined by the College of Policing, by force guidance, by statutory legislation and by the principles contained in the Code of Ethics. Chief inspectors conduct a similar audit every quarter. At a strategic level, a designated superintendent who reports to the use of force group (UoFG), chaired by a chief officer, examines stop and search data. The force uses these data to identify unfairness or good practice, make improvements and share learning. The UoFG submits a report to the operations board and to the PCC through the strategic executive board on any problems regarding use of stop and search by officers.

In our review of 200 stop and search records that the force provided, we found that seven did not relate to the use of actual stop and search powers but to other powers such as the seizure of alcohol under the Police Reform Act 2002. Inclusion of these data within the stop and search data means that the data the force use to monitor use of these powers is not accurate. This is particularly important in respect of rates of finding the item searched for, and to determine any connection between the reasons for stop and search encounters and outcomes. The force should ensure that only records of stop and search encounters are included in stop and search data. Of the 200 stop search records HMICFRS examined, 174 were for drugs. This is a very high proportion. Thirty-five of those searches were carried out on suspicion that drugs were being supplied or trafficked. This is in line with the force priorities to tackle such offences. However, 139 were for possession of drugs alone. The force should consider whether such potentially high levels of stopping and searching people for possession of drugs fits its priorities. In our review of 200 records, we also

found that in 57, the item that had been searched for was found. While this find rate may not appear high, it is, in fact, one of the highest across all forces found during the review.

External scrutiny of stop and search powers to improve treatment

Dyfed-Powys Police could do more to encourage external scrutiny of the use of the stop and search legislation to improve the treatment of people who are stopped and searched. The force has a well-established stop and search scrutiny panel, which reviews stop and search activity and data to identify unfairness and good practice. The panel meets quarterly and reviews between five and ten stop and search records for each division and provides feedback for improvement. Some members of the panel are drawn from the IAG. They received training in the police's powers of stop and search in April 2016. Further guidance is available to all panel members. However, as this report mentioned earlier, the IAG lacks specific representation of young people. As a result, young people are not represented on the panel either. As people aged 18 to 24 are more likely to be stop and searched than those in any other age bracket in Dyfed-Powys, the force's external scrutiny of its stop and search powers cannot be considered truly representative of the community it serves. Furthermore, the force lacks independent advisory groups at a local level. This also means that the force's external scrutiny of stop and search powers is not wholly representative of communities throughout Dyfed-Powys, which is something the force should address.

On a more positive note, the composition of the stop and search scrutiny panel includes independent representation from the IAG, while the full IAG and office for the police and crime commissioner take a close look at feedback from the panel. As with the IAG, HMICFRS found evidence that the force welcomes challenge on its use of stop and search. For example, the force funded a member of the panel to attend a meeting of StopWatch¹⁷ in order to understand better the concerns of those who have been subject to stop and search powers. The force is informed of any concerns and challenges that the panel has raised and action is taken to improve performance. For example, stop and search forms have been amended, to show whether supervisory action has been taken to assure the quality of stop and search recording. However, as this report mentioned earlier, the force is not making the most of the opportunities to use external scrutiny to improve its treatment of people. Likewise, it is not using external scrutiny of its stop and search powers to best effect.

¹⁷ StopWatch is a coalition of legal experts, academics, citizens and civil liberties campaigners. It aims to address excessive and disproportionate stops and searches, promote best practice and ensure fair, effective policing for all.

Reasonable grounds for use of stop and search

To stop and search a person, the Police and Criminal Evidence Act 1984 requires the police to have reasonable grounds to suspect that a person is in possession of a stolen or prohibited article. These grounds also must be recorded on the stop and search record.¹⁸

In our 2013 inspection into the police's use of stop and search powers,¹⁹ we were concerned to see that, of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For Dyfed-Powys Police, the 2013 inspection showed that 50 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,²⁰ we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, we found that 21 of the 98 records we reviewed did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records. This time, we found 14 records did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records completed by the force, our findings indicate that some officers and supervisors either still do not understand fully what constitutes reasonable grounds, or do not know how to record them properly. It is disappointing that some records still do not have reasonable grounds recorded. It is important to note, however, that a lack of reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist in reality at the time of the search.

In 57 of our records we reviewed, the item searched for was found: one of the highest rates recorded during the review. This is an important measure, as the primary purpose of the powers is to confirm or allay an officer's suspicions. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to be strong.

¹⁸ Police and Criminal Evidence Act 1984 Available from:
www.legislation.gov.uk/ukpga/1984/60/contents

¹⁹ *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/

²⁰ *PEEL: Police legitimacy 2015* HMIC 2016 Available from:
www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

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

	2013	2015	2017
Records not containing reasonable grounds	50 of 200	21 of 98	14 of 200
Item searched for found	-	-	57 of 200

Summary of findings



Good

Dyfed-Powys Police works hard to ensure it treats all the people it serves with fairness and respect. Leaders demonstrate a commitment to treating the people they serve fairly and with respect, which is reflected in the workforce’s own understanding. Officers and staff understand the importance of unconscious bias and how to use their coercive powers fairly and respectfully. However, it should do more to ensure the workforce understands the importance of effective communication skills – and how to apply them. The force has made adequate arrangements to scrutinise its use of powers and seeks external challenge to improve the way that it treats people. However, it should do more to ensure that its IAG better represents the communities it serves, particularly young people. The force also needs to improve the way it records and monitors its use of stop and search powers.

Areas for improvement

- The force should ensure that officers and supervisors likely to use stop and search powers understand what constitutes reasonable grounds.
- The force should ensure it has external scrutiny groups at force and local levels, which should have a diverse membership that represents all communities, including young people. Members should also receive sufficient training to be able to challenge leaders with confidence.

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

In HMICFRS' 2017 legitimacy inspection, we continued to focus on the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour among their workforces. We also returned to look at how well forces are handling complaints and misconduct cases,²¹ as opposed to last year's focus on how well forces are guarding against corruption.²²

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

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.²³ Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics. Officers and staff should feel confident that they can apply these principles to their decision-making. This year, we focused on the way that the leaders of forces demonstrate ethical behaviour and the way that forces approach ethical decision-making across the entire workforce. In addition, where forces had failed to comply with all aspects of the national vetting standards in 2016, we assessed whether their plans are credible and are likely to be compliant by December 2018.²⁴

²¹ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

²² We did, however, undertake a review of forces' plans in response to our PEEL legitimacy 2016 national report recommendation. The report of our findings is available here: www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/

²³ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
The role of leadership in promoting ethical police behaviour, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPOR T.pdf

²⁴ HMICFRS' recommendation in December 2016 was that (i) Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so and (ii) Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The ACPO/ACPOS National Vetting Policy was replaced in October 2017 by the Vetting Code of Practice and Vetting Authorised Professional Practice. Available at: www.app.college.police.uk/app-content/professional-standards/vetting/

Leaders as ethical role models

Dyfed-Powys Police encourages its leaders to be ethical role models, and to act in accordance with the force's values of integrity, objectivity and honesty, as set out in force policy. The chief constable has sent an unambiguous message to the workforce of the need to improve standards by doing the "basics brilliantly". This includes acting in an ethical manner at all times. One staff member described ethical behaviour as the "golden thread" running through all policies and practices. Leaders lead by example. The chief constable and deputy chief constable have championed an initiative to stamp out all forms of corruption. The force publishes chief officer gifts and hospitality, business interests and pay and reward on public webpages. Officers and staff to whom HMICFRS spoke felt they could challenge the decisions of senior leaders through a range of non-punitive measures. For example, ethical dilemmas can be referred to the ethics committee anonymously, if this is preferred.

However HMICFRS found that the role and purpose of the ethics committee was not well understood and the committee requires development. We found little compelling evidence that the ethics committee is providing oversight or critical feedback on force policies and procedures, or that the referral process is being used with any great regularity. However, we were pleased to find at the time of our inspection that the ethics committee was undergoing significant changes. A new independent chair had just been appointed and a new electronic referral system had been launched.

Ethical decision making

While we did not find evidence that the ethics committee routinely assessed new force policies and procedures in terms of their quality, we were satisfied that force policies are designed to comply with the College of Policing Code of Ethics. Assessments of the effect of such policies, in terms of quality, are considered throughout the process of drafting them. Some external consultation also takes place. For example, members of the IAG attended Brecon Police Station to test out policies and procedures in the custody suite. IAG members have also provided independent advice to the professional standards department on internal disciplinary policies. Police federation and staff associations are invited to participate in the development of some new policies and procedures as well.

Probationer training includes guidance that considers elements of ethical behaviour as set out in the NDM and Code of Ethics. Personal safety training also covers ethical decision-making. All officers attend an annual two-day refresher course where this learning is tested and strengthened. Ethical training, workshops and leadership seminars focus on the need to act with fairness and respect and include reference to the NDM and Code of Ethics. The College of Policing's new stop and

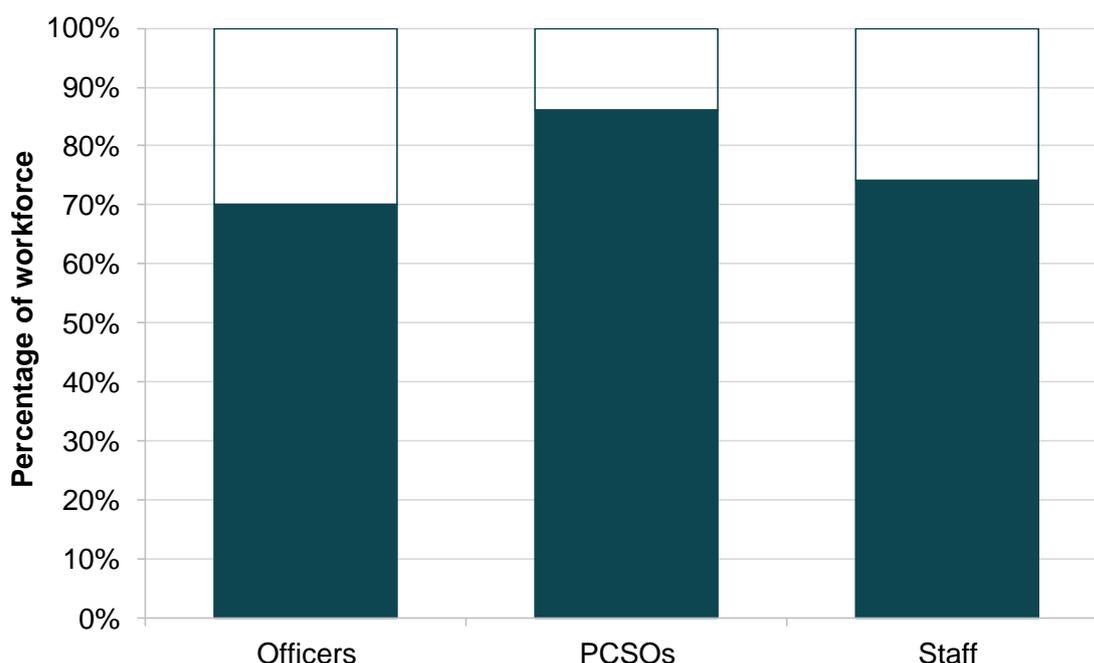
search package, introduced on 1 April 2017, will improve this understanding. The force believes the emphasis on ethical decision-making will make officers and staff more likely to treat the public with fairness and respect.

Vetting

During our 2016 legitimacy inspection, we considered the extent to which the force was developing and maintaining an ethical culture through effective vetting. We found that Dyfed-Powys Police was not complying with all aspects of national vetting standards because it had a vetting backlog of 150 cases. This was undermining the effectiveness of the screening process and placing vetting staff under additional pressure. To address this problem, the force told HMICFRS that it had reduced its caseloads for investigating officers. However, as of 31 January 2017, the backlog had increased to 552 cases. It follows that action to reduce the vetting backlogs identified in 2016 has not been effective to date. However, during the 2017 inspection, the force told us that a bid to increase the number of staff working in the vetting unit had been approved and that a review of procedures had been undertaken to ensure that these are fit for purpose. The force is also planning to collaborate with neighbouring forces to develop an electronic database, so that details on contractors can be shared between forces, thus saving time and money. We were told that the force aims to get rid of the backlog of outstanding vetting cases within two years. Whilst there is clearly more work to be done, HMICFRS recognises that this problem is being addressed and that force's plan to clear the vetting backlog over a period of two years is realistic and achievable, albeit it is at the limit of what would be considered reasonable.

It is important that re-vetting takes place regularly and before an individual is promoted or posted to a high-risk unit. During this year's inspection we asked Dyfed-Powys Police to provide us with data on the percentage of its workforce who had up-to-date security clearance. The data we received showed that on 31 January 2017, 70 percent of officers, 86 percent of PCSOs, and 74 percent of staff had up-to-date security clearance, as illustrated in Figure 2.

Figure 2: Percentage of officers, PCSOs, and staff with up-to-date vetting checks, in Dyfed-Powys Police as at 31 January 2017



Source: HMICFRS Legitimacy data collection

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

An accessible complaints system is crucial to building public confidence in the police and to a force's ability to improve the extent to which its workforce acts ethically and lawfully. As such, we assessed how easy it is for the public to make a complaint – including how well forces support those people that may require additional help to gain access to the complaints process.²⁵ Also, we used a review of case files to assess the level of information provided to complainants and looked at how well forces keep complainants updated about the progress of their complaints.

²⁵ These could include people with learning difficulties, mental health issues, young people or people whose first language is not English. *IPCC Statutory Guidance to the police service on the handling of complaints*, IPCC, May 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/2015_statutory_guidance_english.pdf and *Access to the police complaints system*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf

Ease of making a complaint

Dyfed-Powys Police makes it easy for members of the public to complain. People can contact the police in a range of ways to make a complaint, including via its website. The website is accessible, up-to-date and easily understood. The professional standards department (PSD) has produced posters and leaflets explaining the complaints process. Displayed in Welsh and English, they can be found within custody areas and at front office counters. Members of staff can also record less serious problems that members of the public raise by using the dissatisfaction system; these matters are referred to the OPCC's Public Service Bureau for consideration. If they cannot be resolved quickly, or are more serious, they are passed to the force's PSD for a formal investigation. However, the website does not make it clear how to go about obtaining additional support, for example if someone has difficulties in understanding English. A list of interpreter services is not provided. However, the force website is presented in both English and Welsh.

The force is working with a range of voluntary and public sector agencies to make it easier for members of the public to complain. They include Women's Aid and the Muslim's Women's Network. The force recognises that young people are more likely to come into contact with the police, mainly as a result of stop and search. It provides an easy-to-read complaints form that is specifically designed with this audience in mind. The force should make sure that all members of the public wishing to make a complaint receive the necessary level of support and assistance. Making it easy for people to complain, especially people from communities who may be reluctant to engage with the police, is more likely to instil trust and confidence in the complaints process – and in the force.

Keeping complainants updated

Before our visit to the force, HMICFRS examined 25 complaint cases and 11 internal misconduct cases. We were satisfied that the force provides the legally required information to complainants when a complaint is recorded (under the Police Reform Act 2002 and Police (Complaints and Misconduct) Regulations 2012) and, again, when the complaint is closed. However, a recurring theme during the audit was the lack of evidence that the complainant had been regularly updated, or that the subject and witnesses had been kept informed in the case of misconduct. This was true in 16 of the 25 complaint cases we looked at, and in nine of the 11 internal misconduct cases. The complainant, and those subject to complaint, should be contacted at least once every 28 days. Whilst it could be seen that administration staff working in the PSD had sent out requests for updates to PSD investigating officers at the appropriate times, these rarely elicited a response, or even an acknowledgement. In addition, once a case was chased, there was no reminder. This appeared to apply also to cases dealt with outside of the PSD, where the investigation was managed at a local level.

There was also some evidence that where a discrimination category is used, or where other recorded information indicates that discrimination is involved, more could be done to ensure that those who need additional support receive it. For example, in a case involving a complaint of racial discrimination, little thought was given to the way the force corresponded with the member of the public, although the file indicated that the complainant had mental health difficulties. In another case, of racial discrimination, even though the file indicated that the complainant's first language was not English, the force chose to correspond in English. The force should take steps to ensure that all complainants, and all officers and staff that are the subjects of investigations, receive regular updates. It should also review its handling of complaints that involve discrimination to be sure that those dealing with complaints understand that some complainants require additional support.

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

For the public to have confidence in the police and the police complaints system, it is vital that allegations of discrimination arising from police complaints, conduct matters, and death and serious injury investigations are handled fairly and appropriately. We reviewed complaint, misconduct and grievance files to assess the extent to which forces identify and respond to discrimination appropriately and at the earliest opportunity (including referrals to the IPCC), and the extent to which these allegations are investigated in accordance with the IPCC guidelines for handling allegations of discrimination.²⁶

Identifying and responding to potential discrimination

Dyfed-Powys Police is good at identifying and responding to cases of potential discrimination. Staff working in the PSD receive specialist training in recognising discrimination, which an outside company provides. Other officers and staff receive more general guidance through attending leadership seminars and chief officer road-shows that cover discrimination. Courses provided during probationer and annual personal safety training also cover aspects of identifying and responding to discrimination. All staff coming into contact with the public receive training in hate crime. Officers and staff HMICFRS spoke to had a good understanding of what discrimination is – and its effects. A quality assurance panel (formally residents' panel), made up of members of the public, dip samples closed PSD investigations on a quarterly basis to assess the quality of the service and the outcome provided to complaints. In the 173 PSD files that the panel examined to date, no concerns of discrimination arose.

²⁶ See annex A for more information about our case file review. *IPCC guidelines for handling allegations of discrimination*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/Guidelines_for_handling_allegations_of_discrimination.pdf

HMICFRS looked at ten complaints that the force had identified as containing an allegation of discrimination. We also looked at 25 other complaints and 'dissatisfaction' cases that we considered might contain unidentified allegations of discrimination. We found one dissatisfaction case containing an allegation of discrimination that, in our view, ought to have been recorded as a discrimination complaint. The force agreed with our views and it has now recorded this case as a formal discrimination complaint. We reviewed one internal misconduct case that the force had identified as containing an allegation of discrimination. We also looked at ten internal misconduct cases that we considered might contain unidentified allegations of discrimination. In the misconduct case in which discrimination was evident, the force had identified discrimination correctly. We did not come across any other cases where the force had failed to identify discrimination.

The Police (Complaints and Misconduct) Regulations 2012 requires forces to refer more serious matters to the IPCC if they are aggravated because it is alleged that discrimination was a reason for the behaviour. We also looked at the cases alleging discrimination to see whether the force had complied with the regulations concerning which cases should be referred to the IPCC. We found one internal misconduct case that met the IPCC referral criteria. It had been identified and referred correctly.

Investigating allegations of discrimination

The force is good at investigating allegations of discrimination. All substantive PSD investigators, senior supervisors and decision-makers receive specialist training in aspects of discrimination, including unconscious bias. This means they are qualified to investigate allegations of discrimination to the required standard, as set out in guidance issued by the IPCC. Allegations of discrimination that are investigated at a local level are allocated a PSD single point of contact to ensure compliance with IPCC guidance. The IAG provides independent scrutiny of cases involving discrimination. The PSD senior management team meets the IPCC oversight team regularly. This ensures the force is held to account on more serious cases, and concerning trends in performance in general.

HMICFRS looked at ten public complaint cases that the force had recorded as containing an allegation of discrimination. We considered whether these allegations had been investigated satisfactorily in accordance with the IPCC guidelines for handling such allegations. Although managers who were not directly part of the PSD handled seven of the ten files we examined, we found they had investigated the cases satisfactorily. We also considered whether complainants making an allegation of discrimination received a good service from the force overall. We found that all complainants had received a good service.

Summary of findings



Good

Dyfed-Powys Police is good at ensuring that its workforce behaves ethically and lawfully. The new chief officer team has made it clear to the workforce that they need to improve standards by doing the “basics brilliantly”. This includes acting in an ethical manner at all times. The force encourages its leaders to be good ethical role models in line with the force’s values of integrity, objectivity and honesty. Generally, the workforce consider the ethical implications of their decisions. However HMICFRS found that the role and purpose of the ethics committee was not widely understood. For example, some cases were referred inappropriately to the ethics committee, which suggests the force does not yet fully understand what constitutes an ethical dilemma. The force has a large vetting backlog. However, it is taking positive action to clear the backlog by 2019 and has a credible plan for achieving this. Dyfed-Powys Police makes it easy for members of the public to complain but needs to do more to update both complainants and those subject to complaints. HMICFRS also found that not all complainants received the level of additional support they need. On a more positive note HMICFRS found the force identifies and responds to discrimination appropriately and at the earliest opportunity. We found also that allegations had been investigated in accordance with the IPCC guidelines for handling allegations of discrimination.

Areas for improvement

- The force should ensure it complies with all aspects of national guidelines for vetting; the backlog of cases that require vetting should be reduced immediately.
- The force should improve the quality and timeliness of updates to complainants, in line with IPCC statutory guidance.
- The force should ensure that all officers and staff receiving and investigating public complaints have the appropriate knowledge and skills to support people who may want to make a complaint, especially those who require additional assistance.

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

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and types of behaviour.²⁷ As such, this concept of ‘organisational justice’, and its potential effect on ‘procedural justice’ forms an important part of HMICFRS’ assessment of police legitimacy and leadership. As no comparative data exist on how fairly officers and staff perceive forces have treated them, we continue to focus our assessment on how well forces identify individual and organisational concerns within their workforces and act on these findings.

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

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

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.²⁸ HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances²⁹ – to identify, understand, prioritise and resolve their workforces’

²⁷ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf and *Organisational justice: Implications for police and emergency service leadership*, Herrington, C. and Roberts, K. ^{AIPM} Research Focus, Issue 2, 2013. Available at: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

²⁸ *Ibid.*

²⁹ Grievances are concerns, problems or complaints that a member of staff raises formally with an employer, so data on numbers and types of grievances can provide forces with useful information about matters of concern to their workforces.

concerns. Part of our assessment involved reviewing a small number of grievance cases to assess if these adhere to Acas guidance and the Code of Practice.³⁰

Unfairness, or perceived unfairness in recruitment processes, opportunities and limited career progression can lead to good officers and staff leaving the service prematurely and fewer women and people from black, Asian and minority ethnic (BAME) communities wanting to join the police in the first place. As such, we re-examined how well forces address disproportional workforce representation in a variety of areas – including recruitment, retention and progression for those people with protected characteristics.³¹ We looked at the treatment of BAME officers and staff subject to allegations of misconduct – to improve fairness at work and to make forces more representative of the communities they serve.³²

Leaders seeking feedback and challenge from the workforce

Leaders of Dyfed-Powys Police are good at seeking feedback and challenge from the workforce. At a strategic level, leaders learn from an annual staff survey in which all members of staff are encouraged to take part. This includes a question asking officers and staff whether they have the confidence to challenge their supervisors. Thirty-eight per cent of the workforce took part in the survey, 73 per cent of whom said they felt confident about challenging the decisions of their supervisors. The force also seeks feedback and challenge through its Ask the Chief Blog. This offers direct access to any member of the chief officer team. A response is guaranteed within 72 hours. Senior leaders are far more visible now; officers that HMICFRS spoke to said this visibility had improved noticeably following the appointments of the new chief constable and a deputy chief constable. When we attended a chief officer road-show, we saw senior leaders encouraging feedback and challenge from the workforce. Officers and staff felt confident that they could use these forums to challenge leaders.

The continuous improvement team organises events at which feedback and challenge is encouraged. On these occasions, rank (in the case of officers) is dispensed with, so that the participants can express their views freely and without

³⁰ *Code of Practice on Disciplinary and Grievance Procedures*. Acas 2015. Available from www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf. Also *Discipline and grievances at work: The Acas guide*, Acas, August 2017. Available from: www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf

³¹ The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from: www.legislation.gov.uk/ukpga/2010/15/section/4

³² We last examined these issues as part of our 2015 PEEL legitimacy inspection. See *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

fear of repercussions; views are exchanged on the understanding that confidentiality will be maintained outside of the meeting. Return-to-work interviews take place after any period of unscheduled absence in case underlying personal concerns have arisen. Officers and staff leaving the organisation have an opportunity to take part in an exit interview, so that lessons can be learned from employees leaving the force. We were pleased to find that officers and staff felt able to challenge their leaders and that they believed that their feedback would be acted on. We found evidence that the force had changed some of its practices as a result of staff feedback. For example, in 2016, supervisors said they felt they did not understand mental wellbeing sufficiently to be able to recognise the early signs of depression, anxiety and stress in the workplace. Mental health now is a priority for the force. Supervisors have received appropriate training, mental health awareness sessions take place and the matter of mental health features in workshops held across the force area.

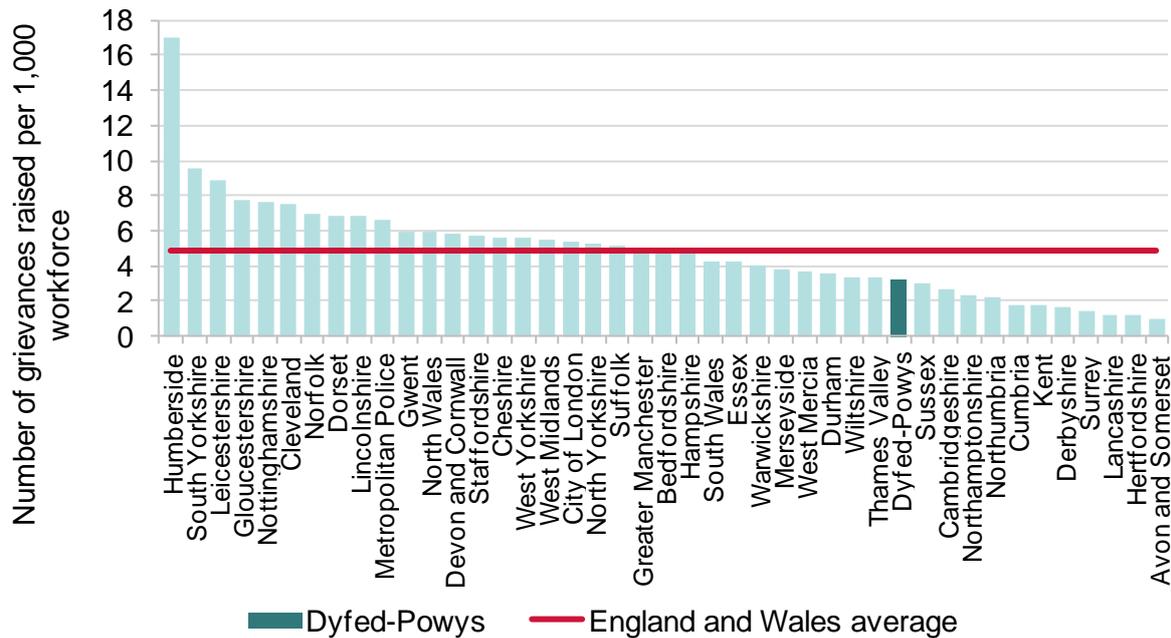
Identifying and resolving workforce concerns

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

All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 3 below shows that Dyfed-Powys Police had 3.3 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

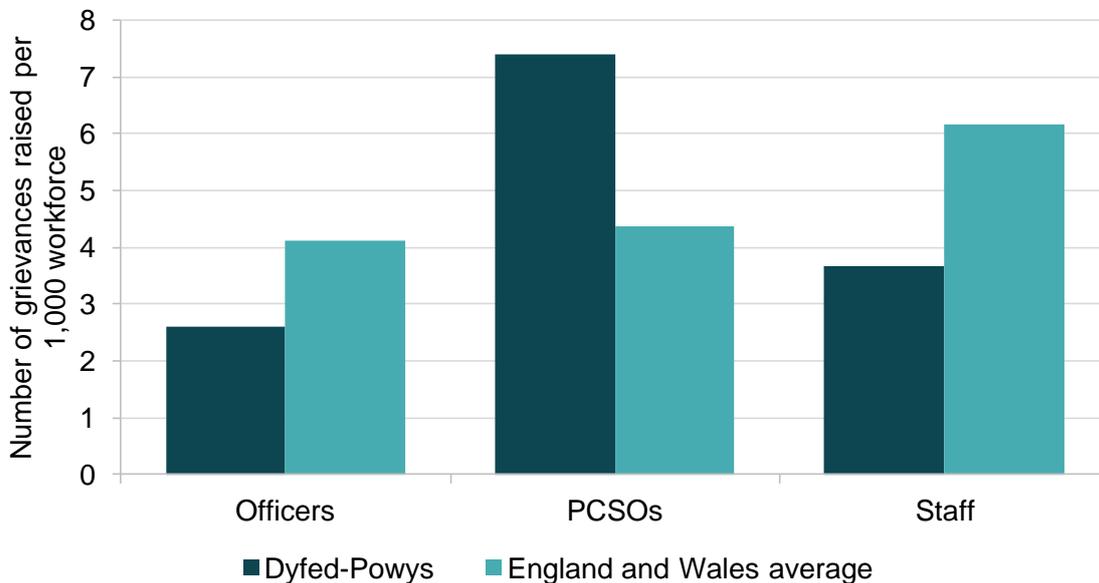
Figure 4 shows that the number of grievances raised by officers in Dyfed-Powys Police was 2.6 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period PCSOs raised 7.4 grievances per 1,000 PCSOs, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 3.7 grievances per 1,000 staff in the same period; and the England and Wales average was 6.2 grievances per 1,000 staff.

Figure 3: Grievances raised per 1,000 workforce, in Dyfed-Powys Police in the ten months from 1 April 2016 to 31 January 2017



Source: HMICFRS Legitimacy data collection

Figure 4: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Dyfed-Powys Police in the ten months from 1 April 2016 to 31 January 2017



Source: HMICFRS Legitimacy data collection

The force is taking action to identify and resolve workforce concerns. It looks at a range of information and data – including feedback from the workforce – to recognise the problems that influence workforce perceptions of fair decision-making and respectful treatment. However, the force needs to do more to ensure everyone understands the grievance procedure and sees it as fair and transparent. The

responsibility for overseeing workforce concerns rests with the People Board, chaired by a chief officer. The embracing diversity board (EDB), a forum designed to ensure chief officers and senior leaders address matters of fairness and respect, supports its work. The assistant chief constable chairs the EDB, which meets quarterly. Members include senior staff and officers across departments, as well as diversity champions and staff support networks. On the advice of the EDB, the force re-launched its fairness at work policy in May 2017, in response to concerns that the workforce did not use or understand the grievance procedure. Although staff can access the procedure easily through the force intranet site, some officers to whom we spoke did not know how to raise a grievance. Others felt they would not be supported in future promotions if they raised a formal grievance. This may explain why the number of grievances raised in the force is below the average for forces in England and Wales.

Members of the workforce must have the confidence to raise grievances or other workplace concerns in the knowledge that the force will respond appropriately and support all those involved in the process. HMICFRS reviewed seven grievance files. We looked first at the arrangements the force had made to support all of the people involved in the grievance and any witnesses. We assessed then whether the force had properly identified, investigated and resolved the grievance in line with the Acas Code of Practice and Guidance.

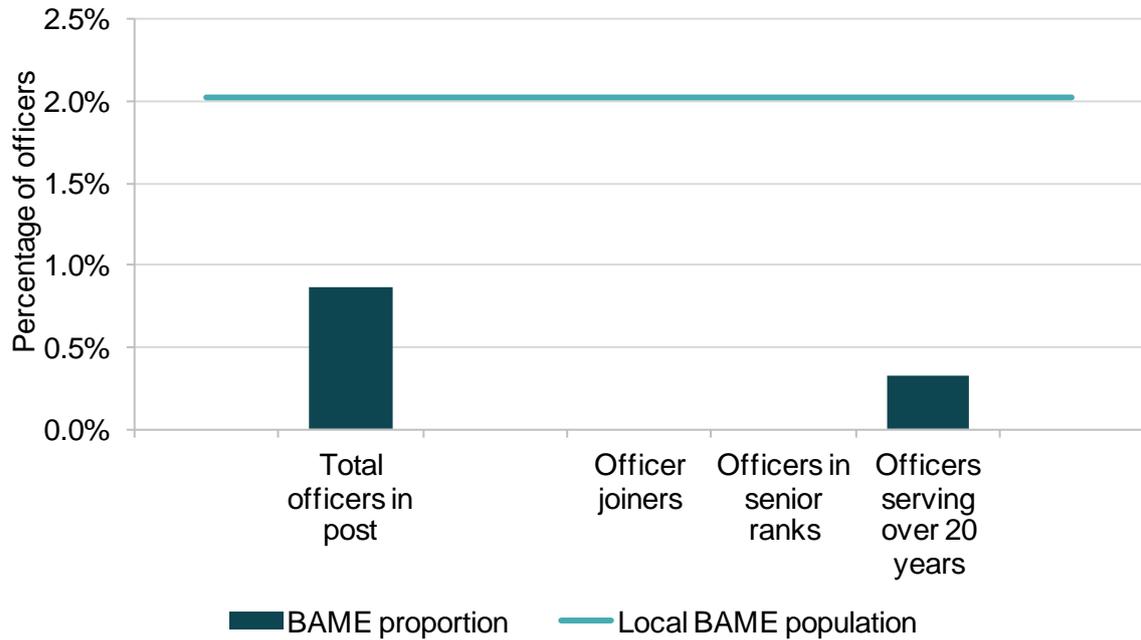
In all but one grievance case, we found a record that appropriate arrangements had been made to support the employee or witnesses throughout the process. We also found that in all grievance cases, the force properly identified, investigated and resolved the grievance in line with the Acas Code of Practice and Guidance. This is encouraging. However, the force needs to do more to communicate these positive results to the workforce so that the grievance process is seen as fair and transparent.

Creating a more representative workforce

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

In the geographical areas served by Dyfed-Powys Police, the 2011 census indicates that BAME people made up 2.0 percent of the local population. In 2016/17, in Dyfed-Powys Police 0.9 percent of officers were BAME (see Figure 5). In relation to officers, none of those joining the force, none of those in senior ranks and 0.3 percent of those who had served over 20 years were BAME.

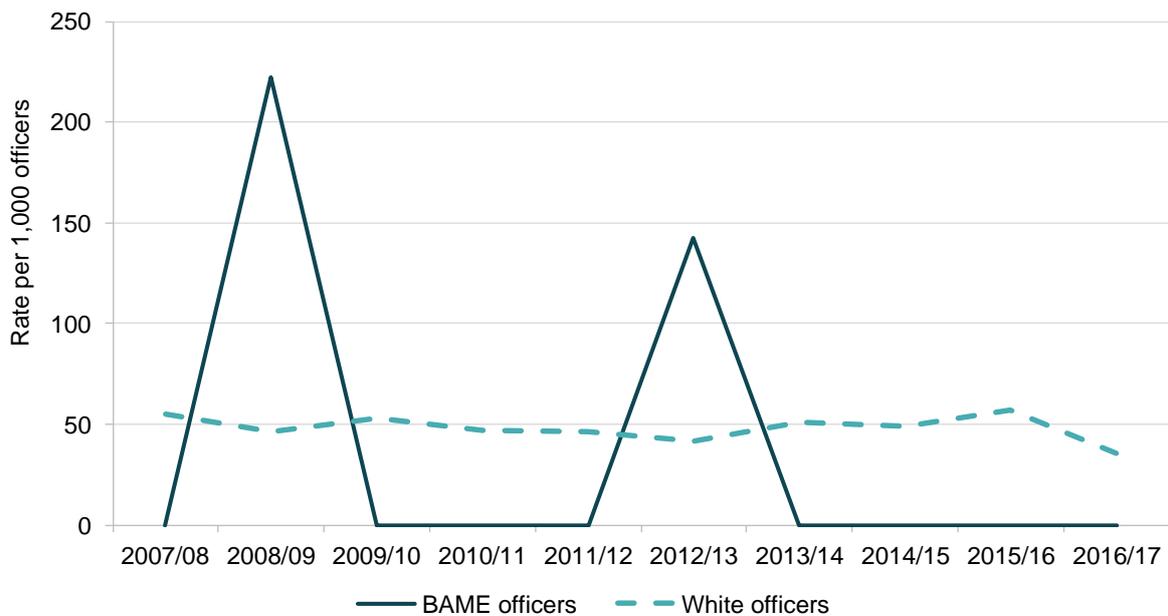
Figure 5: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Dyfed-Powys Police in 2016/17, compared with the percentage of BAME people in the local population



Source: Home Office Annual Data Requirement

Note: High percentages may be due to low overall numbers. The figure above represents officers where an ethnicity was stated.

Figure 6: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Dyfed-Powys Police from 2007/08 to 2016/17

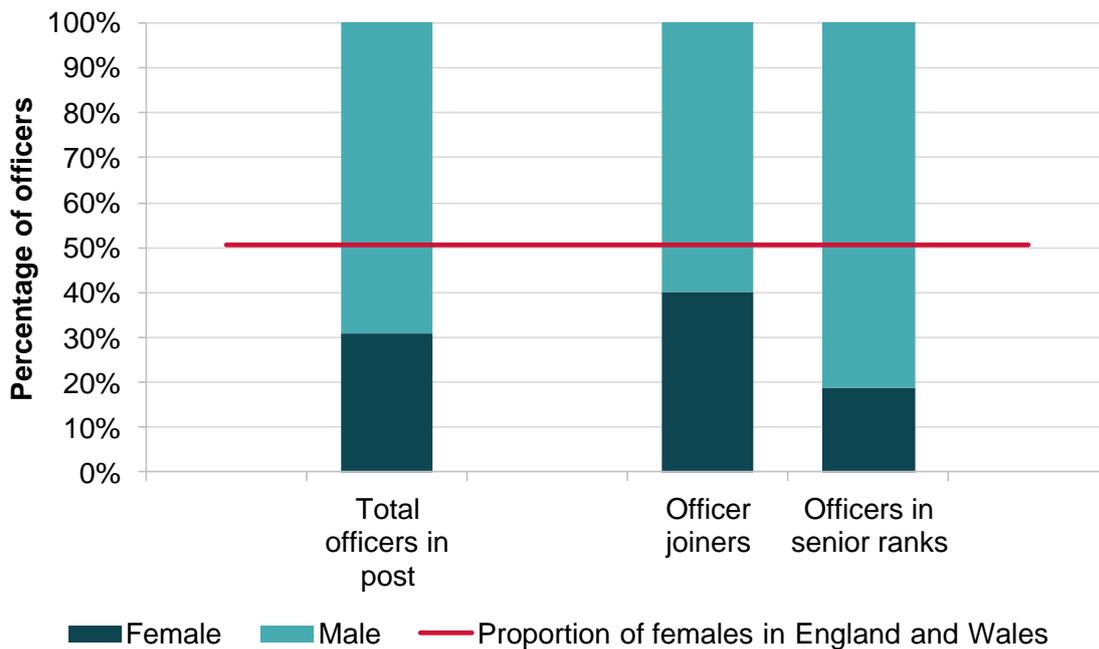


Source: Home Office Annual Data Requirement

In 2016/17 in Dyfed-Powys Police no BAME officers left the force (see Figure 6), while for every 1,000 white officers 36 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

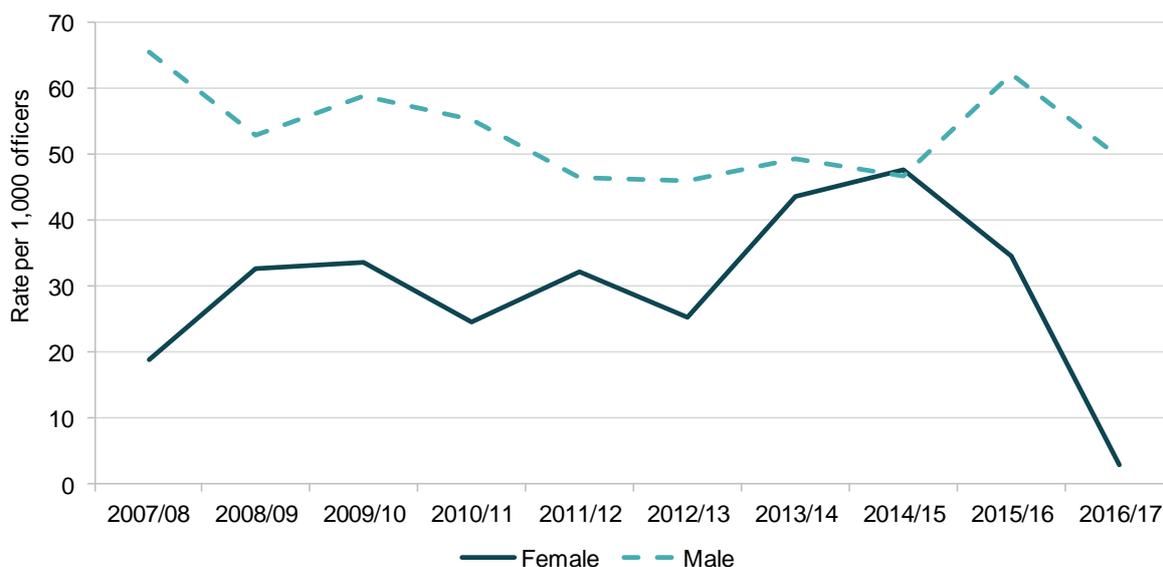
The proportion of female officers is lower than the proportion of females in the general population (51 percent) at 31 percent. In the 12 months to 31 March 2017 in Dyfed-Powys Police, 40 percent of those joining the force and 19 percent of those in senior ranks were female (see Figure 7).

Figure 7: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Dyfed-Powys Police in 2016/17 compared with the percentage of women in the England and Wales population



Source: Home Office Annual Data Requirement

Figure 8: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Dyfed-Powys Police from 2007/08 to 2016/17



Source: Home Office Annual Data Requirement

In 2016/17 in Dyfed-Powys Police 3 female officers per 1,000 officers left the force, compared with 50 male officers per 1,000 officers.

The EDB looks at the data on personal diversity in the workforce at quarterly meetings. The data allow senior leaders to understand representation and any rates of disproportionality among the workforce. For example, the force is aware that female officers are under-represented in specialist units such as firearms and road policing units. Having identified this problem, the force now needs to do more to address this disproportionality. BAME citizens also are under-represented within the force as a whole, and noticeably so within senior ranks. There is no BAME representation at all within senior ranks. Senior leaders have identified this as a priority in terms of recruitment and progression. A positive action officer has been appointed to help the force’s leaders understand what barriers exist, if any, preventing BAME people from joining and progressing within the force. This has contributed to the development of a positive action strategy that looks at recruitment, retention and progression of under-represented groups within the force. HMICFRS hopes this work will lead to a rise in the number of BAME officers and staff employed by the force and their progression to senior positions. To assist in achieving proportionate representation of its communities, Dyfed Powys Police is working towards having a more representative workforce with regard to the number of Welsh speakers in the force. This is being addressed via recruitment and training.

HMICFRS was pleased that the force has recognised it needs to do more to encourage women to rise above the rank of sergeant and assume specialist roles. HMICFRS welcomes the fact that the EDB is taking this important work forward. In order to increase awareness, for example, the EDB has encouraged male and female officers working in specialist units to explain their roles at female staff

network events. The force also takes seriously its responsibility to ensure that policies and practices do not discriminate unlawfully against members of the workforce. Following a complaint of discrimination within the force from a BAME officer, the force recorded a complaint and is investigating it. Then the force conducted a survey among all its BAME officers, to ensure that no further discrimination was taking place. The survey showed that while BAME staff did not feel subject to discrimination internally, they had suffered abuse externally. The force has responded to this by increasing the focus on hate crime for its officers.

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

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do.³³ HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

Dyfed-Powys Police is taking action to understand and promote workforce wellbeing. Leaders see welfare as a priority for the force. It featured prominently in the annual staff survey carried out in the latter part of 2016. Results from the survey have informed the force's leadership and the wellbeing strategy. Nominated wellbeing leads operate across the force. The force provides support to its leaders by providing training in identifying signs of ill health. For example, in response to concerns raised by supervisors, the force has introduced mental health training. It hosted four mental health wellbeing road-shows in 2017. More are planned for 2018. The force includes wellbeing in the role responsibilities for supervisors within its new performance development review process, to ensure wellbeing remains a priority. Officers and staff we spoke to felt that senior leaders prioritise the wellbeing of the workforce to a greater extent than they did before. Those with whom HMICFRS spoke were happy with the level of support being provided. The force has made good progress since 2016, when HMICFRS found that it was working to an out-dated wellbeing plan – and when no annual staff survey had been undertaken since 2012.

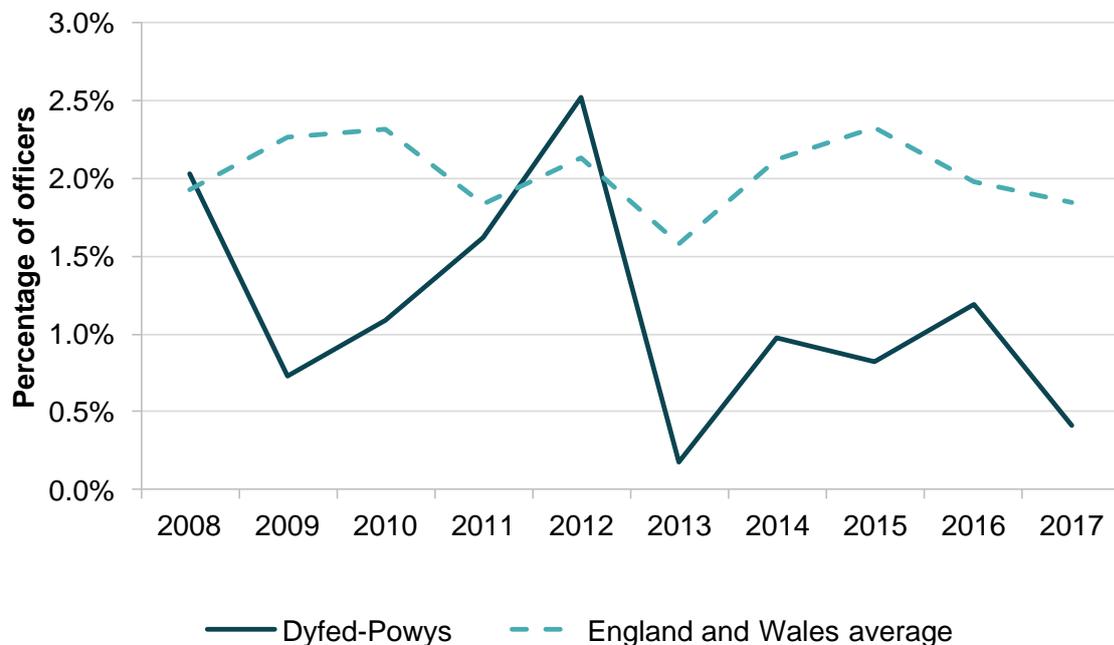
³³ *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: <https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/> Also see <https://fitforwork.org/employer/benefits-of-a-healthy-workforce/>

Identifying and understanding workforce wellbeing needs

Analysis of sickness data can give an indication of whether there are problems relating to wellbeing within a police force. It provides a useful point of comparison between forces who can also use sickness data to help them understand the nature and causes of sickness across the organisation to help them prevent sickness and manage it when it occurs.

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short/medium-term sickness absence. On 31 March 2017 in Dyfed-Powys Police, 0.4 percent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 percent. The latest year for which data is available was 2017 which saw a decrease of 0.8 percentage points from the previous year, which is in line with changes in the last ten year period (see Figure 9).

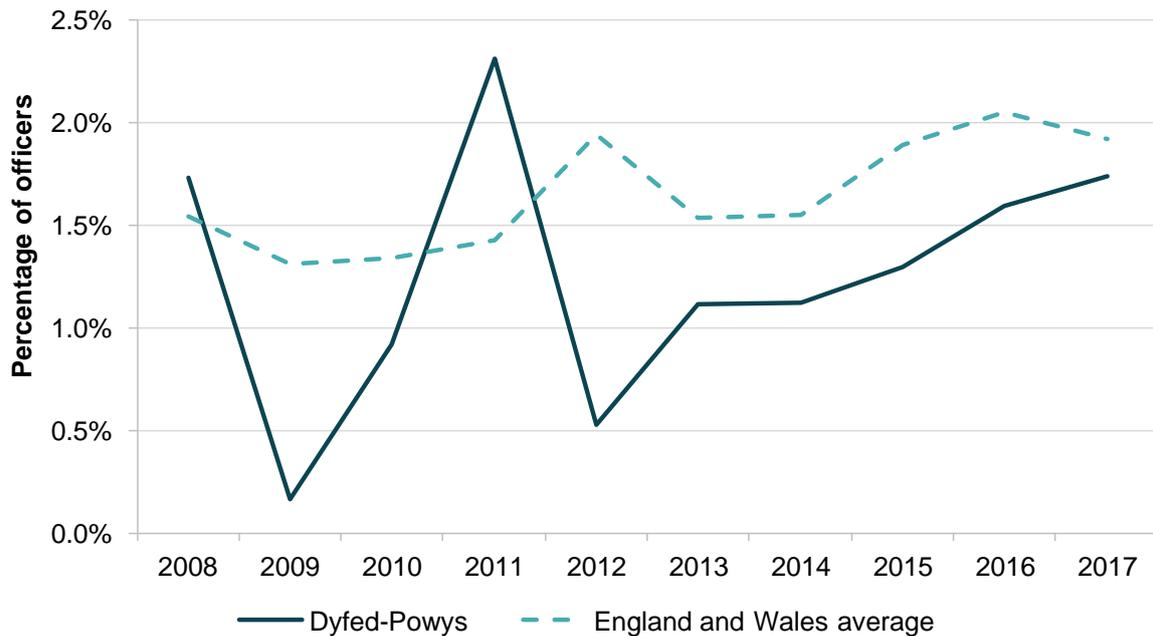
Figure 9: Percentage of officers on short or medium-term sick leave, in Dyfed-Powys Police compared with the England and Wales average, on the 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in Dyfed-Powys Police on long-term sick leave was 1.7 percent and the England and Wales average was 1.9 percent. The latest year for which data were available is 2017 which saw an increase of 0.1 percentage points from the previous year, which is in line with changes in the last ten year period.

Figure 10: Percentage of officers on long-term sick leave, in Dyfed-Powys Police compared to the England and Wales average, as at 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

The force is good at identifying and understanding the wellbeing needs of the workforce. Dyfed-Powys Police uses a variety of ways to identify and understand such matters. For example, it reviews feedback regularly from its annual health questionnaire (AHQ). All police officers must complete this as part of their annual personal safety training. Staff, PCSO and special constables complete the AHQ on a voluntary basis. The combined take-up for both groups is approximately 40 per cent. Occupational health service (OHS) experts assess the AHQs individually and make appropriate recommendations. The force uses this information to understand risks and threats to the wellbeing of the workforce, and any underlying problems. For example, after higher-than-average levels of force sickness were identified in officers working in custody, OHS worked with operational leads to understand why this is so. The AHQ automatically generates referrals to the OHS; officers and staff are offered a confidential appointment with a force counsellor or with a member of the occupational health and welfare team.

At a strategic level, the wellbeing strategy group meets to discuss health and wellbeing matters and identify emerging trends. A chief officer chairs this group, which meets quarterly. The group study data covering wellbeing issues, such as sick absenteeism, assaults and overtime, to ensure that risks to the organisation are being addressed. Health management and attendance boards, made up of health experts and line managers, meet monthly to discuss any underlying causes of ill health within specific business areas. At a local level, supervisors are required to identify individual areas for concern through the performance development review process; supervisors spoken to by HMICFRS are aware of their responsibilities to promote the welfare of their staff and to regularly identify concerns during monthly

and quarterly reviews. The force has included health and wellbeing in the leadership programme for supervisors and managers. Return-to-work interviews take place after any period of sick absence. The rates of long and short-term sick absenteeism in the force are below the average for England and Wales. This suggests that the force is good at identifying and understanding the workforce's wellbeing needs. In 2016, we advised the force to improve the ways it identifies and understands the matters that have most effect on the workforce's perceptions of treatment. This has been done.

Taking preventative and early action to improve workforce wellbeing

Dyfed-Powys Police is good at taking early, preventative action to improve workforce wellbeing. It promotes wellbeing through specific pages on a public-facing intranet site called the Dyfed-Powys Police wellbeing zone. This site promotes healthy living and stress awareness. Officers, staff and, equally importantly, family members can access it. Currently, the site is promoting greater awareness of diabetes. As previously mentioned, the force undertakes an annual health questionnaire to spot early signs of ill health. It also conducts health screening at various road-shows throughout the force. Flu jabs, blood pressure tests and health checks are offered at all police stations. The force occupational health unit (OHU) provides preventative advice on health and work, which an in-house counselling service supports. Officers we spoke to said that they were happy with the service provided; they were particularly pleased with the service that the OHU provides. Wellbeing events, including mental health road-shows, are held regularly at stations throughout the force area.

Supervisors receive training, guidance and support in recognising the early signs of ill health and in learning how to manage performance. For example, OHU specialists promote stress and mental health awareness. The force is working hard also to remove any stigma surrounding mental health, to ensure that officers and staff feel comfortable in discussing mental health concerns. This is encouraging progress because in 2016 HMICFRS found that supervisors did not always feel equipped to recognise ill health, particularly in relation to mental health. Nominated HR managers are attached to each regional office and offer advice when unsatisfactory performance procedures and unsatisfactory attendance procedures are identified. However, as this report mentioned earlier, the PSD should consider revising its procedures to ensure that those subject to investigation and allegations of misconduct receive timely and informative updates. The absence of regular updates creates uncertainty and adds to the stress for those involved. By taking preventative, early action, the force is more likely to have a healthy, happy and more productive workforce.

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

College of Policing research on organisational justice suggests that the process for promoting people and failure to deal with poor performance may have an adverse affect on workforce perceptions of fairness, and this in turn may lead to negative attitudes and types of behaviour in the workplace.³⁴ In addition, effective performance management and development mitigate risks to the force and ensure continuous improvement. HMICFRS assessed how fairly and effectively forces manage the performance of individual officers and staff, including the value that forces place on continuing professional development (CPD), in line with guidance from the College of Policing.³⁵ Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

Managing and developing individual performance

Dyfed-Powys Police needs to improve the way it manages and develops individual performance. In 2016, the force told us that the personal development review (PDR) process had been suspended due to technical difficulties. We found then that officers and staff had a very poor understanding of the PDR process. The approach taken to the completion of face-to-face meetings between the job holder and supervisor, and the completion of annual assessments, was very inconsistent. The PDR process, therefore, was dysfunctional and fragmented. HMICFRS is pleased to find that the force has consulted with the workforce and staff representatives and has re-introduced a PDR, based on a broader notion of what officers and staff want. The new chief officer group has encouraged the importance of managing and developing individual performance. Former problems with IT have been dealt with.

However, while the officers and staff to whom we spoke were pleased that a new PDR was being re-introduced, few had benefited from it as yet. Furthermore, some officers told us they had not received an appraisal for years. This is deeply troubling. The force recognises that it needs to do much more. The goal is for face-to-face meetings between the job holder and supervisor to take place at least three times a

³⁴ *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.

³⁵ College of Policing guidance on the police performance development review (PDR) process is available from www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

See also the College of Policing's competency and values framework. Available from:

www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx

year, and for assessments to be completed annually. This process is underway. The new PDRs will include a self-assessment section about personal behaviours and about how these complement the values of the force.

The PDR process will also focus on continuous professional improvement. It will form the basis on which skills and leadership qualities throughout the workforce can be understood and developed. By the end of 2018, all officers and staff will have completed at least one annual cycle of assessment. New officers and staff will benefit from the revised arrangements at their first review. However, the force has some way to go before these new processes are effective. At present, the force cannot say it has effective arrangements in place to assess and develop the individual performance of its officers and staff. The force has not yet had the opportunity to evaluate the new PDR process. The continuous improvement team, reporting back to the people board, will undertake this task.

Identifying potential senior leaders

Dyfed-Powys needs to improve the way it identifies potential senior leaders. The force introduced a talent management scheme in 2015. The aims of this scheme are to: identify and encourage those police officers and staff who demonstrate real potential; provide officers and staff with different learning and development opportunities; empower people to use learning and development experiences to improve the service the force delivers; align learning and development with the organisation's priorities and; demonstrate that the force values its officers and staff.

Successful applicants join the scheme for two years. Officers and staff we spoke to had heard of the scheme – known as Llywio ('to steer'). However, we found that not all members of the workforce understood the purpose of Llywio. Some see the scheme as a means of career progression, others as a talent management process designed to help individuals gain a broader understanding of policing. The force should do more ensure that the whole workforce understands the purpose of Llywio.

In HMICFRS' view, the Llywio selection process would benefit from better structure and governance. The criteria for selection lack clarity and purpose. The force should do more to explain how people are selected, including the qualities required to join Llywio. However, we were pleased to find that the selection process is subject to external scrutiny by the OPCC; officers and staff spoken to by HMICFRS did not express concerns about the fairness of the selection process. Individuals joining the scheme obtain clear benefits. For example, successful applicants get the chance to observe good practice across different private-sector organisations. However, the scheme's wider benefits to the organisation were less clear to HMICFRS. The activities that participants undertake do not appear to be linked directly to the organisation's priorities and needs. Nor has evaluation established what the force is doing better as a result of the scheme. In order to encourage wider participation, senior leaders need to understand its successes more broadly and publicise them throughout the organisation.

Selecting leaders

The force needs to improve the way it selects its leaders. The annual appraisal process should help inform the way leaders are selected for posts. However, as already explained in this report, Dyfed-Powys Police lacks effective arrangements to assess and develop the individual performance of officers and staff. In consequence, it cannot yet use this understanding to evaluate and fairly compare officers and staff who show an aptitude for further progression within the force. If the force wishes to develop an open, transparent and fully independent promotion process, an effective performance development review process is vital. This will give officers and staff greater confidence in the promotion and selection process.

Officers and staff that HMICFRS spoke to expressed little confidence in the promotion and selection processes. They felt that the initial consideration phase was not independent enough, and depended too much on the input of middle managers. For example, in the promotion process for officers, the application cannot be forwarded to the next stage until it obtains the support of both the immediate supervisor and local chief inspector. There is no independent scrutiny at the initial application stage. Some felt that promotion still depended on who you knew in the force. However, the subsequent stages were seen as fair and independent. This is because personal details and biographical data are removed from the application prior to short listing by the promotion panel. This ensures that assessors take an evidence-based approach in deciding who should go forward to the next stage. A moderation process also includes representation from people services, staff associations and independent members. Those who do not succeed receive feedback. Overall, however, the absence of an established annual appraisal process linked to the promotion process – and the lack of transparency around the initial application phase – mean that officers and staff have no confidence in the way the force selects its leaders.

Summary of findings



Requires improvement

Dyfed-Powys Police requires improvement in some aspects of treating its workforce with fairness and respect. The force has made some progress since 2015, when we found that officers and staff did not feel able consistently to challenge decisions or inappropriate behaviour. In 2017, we found the workforce felt confident about challenging its leaders and that wellbeing was a priority for the leadership. The force is good especially at taking early, preventive action to improve staff wellbeing. Dyfed-Powys Police is also making determined efforts to manage grievances effectively, maintain open communication and identify opportunities for their early resolution. However, the force needs to do more to ensure that the grievance process is

understood and perceived as fair and transparent. HMICFRS was disappointed to find that attempts to improve the diversity of the workforce have not succeeded in terms of BAME representation. We hope the changes made in the chief officer group and the appointment of a positive action officer will bring about rapid changes to the current disproportionality, and that, in future, BAME representation will more closely reflect the diversity of the local population. In 2016, HMICFRS recommended that the force improve its management of individual performance so we were pleased that the force has re-introduced an annual appraisal process. However, at the time of the inspection, few officers had benefited fully from the new system, and some officers still have not received an annual appraisal for 'many years'. The force also needs to improve the ways in which it identifies potential senior leaders through its talent management scheme and the promotion process. The entire workforce needs a better understanding of the processes, which must be subject to independent scrutiny at all stages of the application process.

Areas for improvement

- The force should ensure that its grievance procedures are accessible and transparent, and are perceived by the workforce as being fair.
- The force should ensure that it has effective processes in place to identify and understand the causes of potential disproportionality in the recruitment, retention and progression of its workforce, and to take effective action to address these causes.
- The force should ensure it has effective systems, processes and guidance in place to manage individual performance.
- The force should ensure that its promotion and selection processes are accessible and transparent, and are perceived by the workforce as fair.

Next steps

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

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

Annex A – About the data

Data used in this report

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

Methodology

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

Comparisons with England and Wales averages

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

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

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

Statistical significance

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

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

Population

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

Note on workforce figures

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

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

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

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

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff³⁶. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

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

Ethnic diversity and gender diversity

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

Grievances

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

³⁶ See sections 38 and 39 of the Police Reform Act 2002. Available at: www.legislation.gov.uk/ukpga/2002/30/section/38

Stop and search

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

Figures throughout the report

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

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

Figure 2: Percentage of officers, PCSOs, and staff with up-to-date vetting checks, in Dyfed-Powys Police as at 31 January 2017

Data are derived from the HMICFRS data collection conducted prior to inspection. HMICFRS asked forces to provide the number and percentage of officers, staff and PCSOs who did not hold up-to-date security clearances in accordance with the ACPO Vetting Policy 2012.

Figure 3: Grievances raised per 1,000 workforce, in Dyfed-Powys Police in the ten months from 1 April 2016 to 31 January 2017

Figure 4: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Dyfed-Powys Police in the ten months from 1 April 2016 to 31 January 2017

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

Figure 5: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Dyfed-Powys Police in 2016/17, compared with the percentage of BAME people in the local population

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

Figure 6: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Dyfed-Powys Police from 2007/08 to 2016/17

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

Figure 7: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Dyfed-Powys Police in 2016/17 compared with the percentage of women in the England and Wales population

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

Figure 8: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Dyfed-Powys Police from 2007/08 to 2016/17

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

Figure 9: Percentage of officers on short or medium-term sick leave, in Dyfed-Powys Police compared with the England and Wales average, on 31 March from 2008 to 2017

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

Figure 10: Percentage of officers on long-term sick leave, in Dyfed-Powys Police compared with the England and Wales average, as at 31 March from 2008 to 2017

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

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by working back in time from 7 January 2017 until a total of 200 was reached.³⁷ This amounted to a total of 8,574 records – some records provided were not actually records of stop and search encounters, and these were excluded. As part of our assessment, we gave forces the opportunity to review our findings and make representations.

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

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

Professional standards case file review methodology

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

- 10 complaints the force had recorded as containing an allegation of discrimination
- 15 complaints the force had recorded in categories we felt may contain unidentified allegations of discrimination

³⁷ City of London Police was unable to provide records up to 7 January 2017 but instead provided 200 records from 4 October 2016 to 26 November 2016.

- 10 service recovery complaints (if the force operated a separate service recovery scheme)
- 10 internal misconduct allegations the force had recorded as containing an allegation of discrimination
- 10 other internal misconduct allegations (so that we could ascertain if they contained unidentified allegations of discrimination)
- 10 grievances (and 10 workplace concerns if the force recorded these separately)

We assessed these case files against the relevant legislation, guidance and code of practice³⁸ to answer the following questions:

- Access to the system – Has the force identified those cases where the complainant requires additional support to make their complaint, and has that support been provided?
- Initial information – When the complaint was recorded, did the force provide the complainant with a copy of the complaint record, an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details)?
- Keeping complainants updated – Has the force provided complainants, witnesses, and those who are the subject of the complaints with regular, meaningful updates?
- Final outcome – Did the force provide the complainant with the findings of the report, its own determinations and the complainant’s right of appeal?
- Handling discrimination – Has the force failed to identify any allegations of discrimination? Have any discrimination cases that meet the IPCC mandatory referral criteria been so referred? Has the force investigated the complaints alleging discrimination satisfactorily? Overall, has the complainant making an allegation of discrimination received a good service from the force?
- Grievances/workplace concerns – Has the force identified, investigated and resolved the grievance satisfactorily? Has the force put arrangements in place to support the employees or witnesses throughout the process? Did the witness and those who are subject to the allegations receive a satisfactory service from the force?

³⁸ Relevant police complaints and misconduct legislation, IPCC statutory guidance, IPCC guidelines for handling allegations of discrimination, Acas code of practice on disciplinary and grievance procedures and Acas discipline and grievance guide.