

PEEL: Police legitimacy (including leadership) 2017

An inspection of Gloucestershire Constabulary



December 2017

© HMICFRS 2017

ISBN: 978-1-78655-494-9

www.justiceinspectors.gov.uk/hmicfrs

Contents

Introduction	3
Force in numbers	5
Overview – How legitimate is the force at keeping people safe and reducing crime?	7
To what extent does the force treat all of the people it serves with fairness and respect?	9
To what extent does the force understand the importance of treating people with fairness and respect?	9
How well does the force understand the extent to which its workforce treats people with fairness and respect?	13
How fairly does the force use stop and search powers?.....	15
Summary of findings	20
How well does the force ensure that its workforce behaves ethically and lawfully?	21
How well does the force develop and maintain an ethical culture?.....	21
How accessible is the complaints system to all members of the public?	24
How well does the force identify and investigate potential discrimination by officers and staff?.....	26
Summary of findings	28
To what extent does the force treat its workforce with fairness and respect?	30
How well does the force identify and act to improve fairness at work?	30
How well does the force support the wellbeing of its workforce?	39
How fairly and effectively does the force manage and develop both the performance of its individual officers and staff and its selection processes?	42
Summary of findings	45
Next steps	46
Annex A – About the data.....	47

Introduction

As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HMICFRS¹ 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/gloucestershire/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/gloucestershire/.

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

1,786

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

officers

staff (including section 38)

PCSOs

1,089

595

102



Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

2.2%

officers

staff

PCSOs

2.3%

1.8%

4.9%

Percentage of BAME in local population, 2011 Census

4.6%



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

Gloucestershire Constabulary

officers

staff

PCSOs

31%

59%

52%



Grievances

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

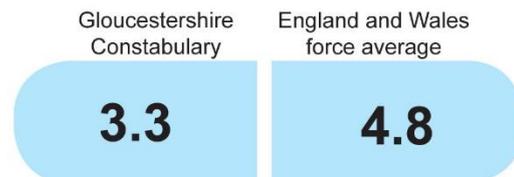


Stop and search

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

2,044

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



Gloucestershire Constabulary 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, when we judged the force to require improvement. The force is judged to be good at treating all of the people it serves with fairness and respect. It is now also judged to be good at how well it ensures its workforce behaves ethically and lawfully and good at 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?



Gloucestershire Constabulary is assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime. The force has improved on last year's inspection in which we found it to require improvement in respect of its legitimacy.

The force continues to reinforce the importance of treating people with fairness and respect and has made good progress on the areas identified for improvement in last year's report. It has introduced a structured governance process to manage misconduct problems and complaints. It has also made improvements in how it treats its workforce with fairness and respect. However, it could do more to improve the way it identifies and develops staff with high potential.

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

Areas for improvement

- The force should do more to ensure that people who need additional assistance with making a complaint are provided with the information and support they need.
- The force should improve its communication to all staff about the benefits of the leadership programme and how they can access it.

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

Force leaders in Gloucestershire Constabulary demonstrate that they understand and value the benefits of treating people with fairness and respect and have adequate arrangements in place to ensure the workforce have the knowledge and skills they need. This is reflected in the force's vision and values, which complement and reinforce the principles set out in the Code of Ethics.⁹ Officers and staff we spoke to during our inspection clearly understood the importance of treating people with fairness and respect. The force recognises that treating witnesses and victims fairly and considerately is essential to their effectiveness. It uses videos of local victims of crime describing their experiences to show the effect the behaviour of officers and staff can have on a victim's experience. To increase awareness and promote discussion, the force is in the process of displaying key messages and images around all police buildings to reinforce the value of treating all the people it serves with fairness and respect.

The force has made progress since HMICFRS' legitimacy inspection last year. In the victim satisfaction survey and the local policing survey, both of which are conducted monthly, it asks questions relating to fairness and respect. Information from these surveys is used to benchmark how officers and staff treat people with fairness and respect and identify any areas for improvement. Neighbourhood policing teams engage with the community and gather information on how the community perceive their treatment by the officers in their local area. The force's continuous improvement team use this information to produce bespoke reports for each of the six local policing areas (LPAs) and the force control room (FCR), highlighting good practice

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 *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available from: 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 from: http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf; *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/

and areas for improvement. Managers are able to give clear direction to their staff about how and where to make a difference and, as a result, the relationship between the police and public is improving.

Understanding of unconscious bias

Gloucestershire Constabulary understands the effect that unconscious bias can have in the fair treatment of the public it serves, but it needs to do more to ensure there is a consistent understanding across the whole workforce. Not all staff have received recent unconscious bias training. Training is provided to student officers and there are plans to provide specific training in September 2017 to officers and staff who have direct contact with the public. Unconscious bias is incorporated in other training, such as officer safety, stop and search and the national decision model (NDM).¹⁰

The force uses a range of methods to inform and develop the workforce's understanding of unconscious bias by providing guidance about the concept of unconscious bias in various training sessions, including specific inputs on divisional training days, leadership days, stop and search training and officer safety training. Further examples include initiatives about hate crime, in which officers and staff learn about working with the transgender community to build trust and confidence.

Staff we spoke to during this inspection described how this training and guidance had influenced the ways in which they both work with victims and support them. It also helped them to understand how their upbringing might affect their assumptions and decision making. The learning and development team has reviewed College of Policing guidance and best practice to ensure that the training provided is relevant and up to date. Workshops are scheduled throughout the coming year to educate staff on the effect of unconscious bias.

Communication skills

Only specialists such as family liaison officers and tutor constables who have had enhanced training have received specific training on the importance of effective communication skills, rather than all relevant officers and staff. Officers we spoke to during this inspection said that effective communication is included in officer safety training, although this is mainly targeted at communicating with hostile members of the public. Effective communication skills are included in the 17 weeks' initial training for officers and the training for PCSOs.

¹⁰ The national decision model is specific to policing. It provides a consistent framework in which decisions can be examined and challenged, both at the time and afterwards. It is composed of six main elements, the police code of ethics being central to the decision: gather information; assess threat and risk; consider powers and force policy; identify options; take action; and review what happened.

The force has an initiative in place providing an opportunity for officers to work with a community group which provides services to people with learning difficulties. This is intended to develop officers' communication skills and to improve their understanding of different communication styles and how these can affect the individual. The force plans to extend this initiative to all incident response and neighbourhood teams over the next year. Force control room staff, PCSOs and front counter staff have an opportunity to take an NVQ in customer service, and funding is being made available through the apprenticeship levy. Eleven members of staff have already qualified and a further ten are going through the assessment process. Staff from the learning and development team conduct 'mystery shopper' exercises to review staff performance and to offer development opportunities where deficiencies occur. Development sessions on how to conduct difficult conversations and develop effective communication skills have been provided to newly promoted sergeants and inspectors and are regularly available for other officers and staff. There have been 15 sessions in the last six months, which equates to 90 officers and staff who have attended sessions in this period. Evaluation of the sessions has been positive; officers and staff have described improved confidence when dealing with the public.

Officers we spoke to during this inspection had a good understanding of the importance of effective communication skills when dealing with members of the public. Most described how they had improved their communication skills through a combination of on-the-job training, working with experienced colleagues and applying the force values.

Use of coercive powers

There is a good understanding in Gloucestershire Constabulary of how to use coercive powers and the importance of treating people with fairness and respect. During our inspection, officers and staff clearly demonstrated their understanding of the NDM, and the force's values and the Code of Ethics, and could make the link to the legitimate use of their powers. The use of coercive powers is included in the mandatory annual officer safety training. Additionally, a number of internal communications on the best use of stop and search have been produced by the force to ensure that officers are aware of changes in the legislation on coercive powers, the College of Policing Authorised Professional Practice (APP) and legislation relating to the necessity of arrests. This includes guidance on treating people with fairness and respect. Guidance and awareness updates are also provided in divisional training days, which are held every ten weeks.

Officers we spoke to during our inspection were able to provide examples of types of coercive powers, including the use of stop and search and the power to detain, and describe how they used them fairly and respectfully. An officer cited an example of an incident when he suspected a man of possessing controlled drugs; he explained how he had used his powers correctly to detain and search him, and how this led to the recovery of the drugs and arrest of the suspect.

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 force¹¹ 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,¹² 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

Gloucestershire Constabulary has effective scrutiny in place to monitor and ensure that force is used appropriately. It complies with the national recording standard on the use of force and scrutinises the data. This includes the use of handcuffs, CS spray, batons and firearms, including the use of Taser. All incidents of firearms or Taser deployment are recorded on the daily strategic briefing sheets; they are reviewed by the chief officer team and are subject to further review by specialist firearm instructors. In HMICFRS' 2015 legitimacy inspection, Taser was assessed as being used fairly and appropriately – this has not changed. We found that the management and deployment of Taser were subject to intense scrutiny, allowing the force to review properly the officers' decision-making processes in all deployments and establish if the individuals' actions were appropriate.

A form is completed when any type of force is used; it is analysed by senior officers to identify trends, such as the number of times force is used by an individual officer, if there are repeat subjects and whether any injuries are caused. All complaints are monitored by the force, and a report is produced for the force monthly performance meetings. This includes the number of complaints, types of complaint and any trends. At a local level, the area commander takes a very active interest in

¹¹ 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/

¹² *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

complaints and concerns of dissatisfaction expressed by the public. Complaints are reviewed jointly with the professional standards department to identify any officers or staff who attract repeated complaints. Any problems identified are brought to the attention of the supervisor and appropriate action is taken to address the concern. Interventions range from additional training through to formal disciplinary action.

External scrutiny to improve treatment

Gloucestershire Constabulary has several external scrutiny groups at force level. It encourages and invites scrutiny, openness and debate in order to demonstrate its commitment to treating the public with fairness and respect and to making improvements where problems are identified. The force has an independent advisory group (IAG), a stop and search scrutiny group and an independent custody visitor scheme (IVS). These groups meet regularly and provide the force with external views and comments on a range of subjects, including stop and search, complaints and the review of relevant force policies. The members of the groups are trained and provided with data and support from officers to be able to carry out their role effectively. Members feel confident to challenge the force and have provided examples of chief officer responses when such concerns have been raised. IAG members regularly discuss force priorities, community concerns, the effect of local policing operations and their relationship with topics of national interest such as stop and search, hate crime and modern day slavery. The chair of the IAG attends force meetings related to policy and operational matters and has regular meetings with chief officers and other force department heads. For example, the IAG works with the force stop and search lead on the development, review and training of stop and search. IAG members have recently provided the force with a list of their skills and experience, and this has been shared with the force to ensure their skills and experience are used better. The chair of the IAG also sits on the force ethics committee, where he has the opportunity to raise problems from the public including community groups to influence decisions and thinking.

IAG membership is regularly reviewed and new delegates are recruited when either emerging themes or problems of community interest dictate the need. Both the IAG and stop and search scrutiny group have an independent chair and are becoming increasingly diverse. Younger panel members and those who have been subject of stop and search have been sought via social media.

The force could do more to publicise the existence of the groups and encourage members of the community to become involved. The minutes of the meetings are not made available on the force website and there is no information explaining how the community can join or take part in either the IAG or stop and search scrutiny group. As a consequence, the force is not doing all it can to encourage external discussion and debate from all its communities.

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.¹³

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.¹⁴ Our 2015 legitimacy inspection¹⁵ 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.¹⁶ Also, we assessed how the forces scrutinise use of these powers.

Understanding of national guidance

In HMICFRS' 2015 legitimacy report, we said that Gloucestershire Constabulary should improve its stop and search records to include sufficient reasonable grounds to justify the lawful use of the power. We also found that not all officers fully understood the grounds required to lawfully stop and search people. The force has made progress in this area. Detailed briefing material has been circulated to officers to highlight the College of Policing's authorised professional practice (APP) on what constitutes reasonable grounds.

The force has provided training and guidance to some of the officers who engage with the public and who may use stop and search powers. It has a clear plan to roll out further guidance to ensure that all relevant officers understand the legislation and use their powers fairly and respectfully. To date, specific training in line with the

¹³ *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

¹⁴ *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/

¹⁵ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

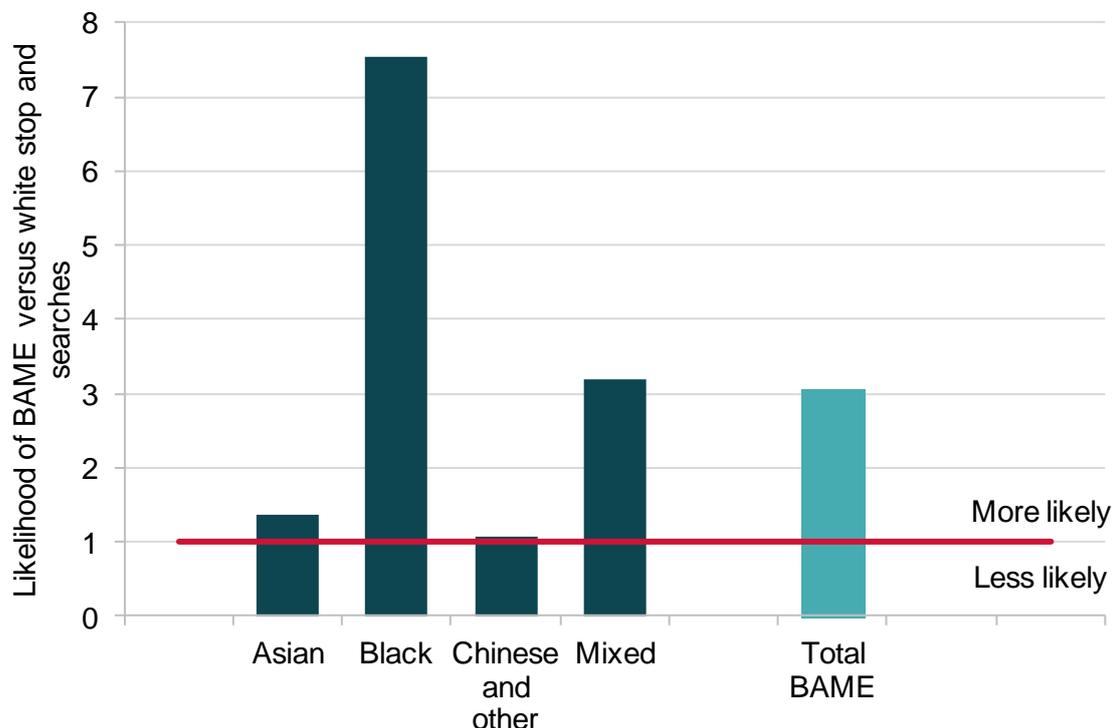
¹⁶ See annex A for more information about the methodology for our review of stop and search records.

College of Policing's APP has been focused on probationer constables. The force training staff have attended the College of Policing and there are plans to train a further 680 officers between August and October 2017. In the interim, the force has appointed stop and search champions, who have received enhanced training and act as a single point of contact for officers and supervisors to ensure that stop and search powers are used lawfully and respectfully. The force has used different ways to inform officers about changes in the legislation on coercive powers, including the College of Policing's APP, and email updates and briefings on the force intranet. Guidance and awareness updates are also provided during divisional training days. Additionally, supervisors check and sign off every stop and search encounter, and have a conversation with the officer to ensure the powers are used appropriately. We found that officers were well informed and were confident that, when conducting stop and search, they were using the powers correctly and in a fair and respectful way. However, the findings of our review of stop and search records suggest that the force may need to do more work to ensure that officers are recording reasonable grounds correctly.

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 Gloucestershire Constabulary, black, Asian and minority ethnic (BAME) people were 3.1 times more likely to be stopped and searched as white people. Black people were 7.5 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)¹⁷ compared with white people, in the local population of Gloucestershire Constabulary in the 12 months to 31 March 2016



Source: Home Office 2016

Gloucestershire Constabulary monitors how stop and search powers are used and collects extensive information relating to ethnicity, age and gender. It has a comprehensive understanding of the use of the legislation and the effect the interaction has on the community. The force also monitors the frequency with which it uses the powers on individuals, for example, individuals stopped and searched multiple times. Senior officers use this information to identify trends or unfairness and make improvements in how stop and search powers are used. The force has acquired visual analytical software to improve the way it monitors the data and reports to the chief officer team. This software allows the force to record and report on each stop and search encounter in detail: the reason why an individual was searched; stop rates per 1,000 population; what was found during the course of a search; searches by age and ethnicity; and the number of occasions that an individual was searched. The aim is for this software to be provided to all inspectors so they can analyse the activity of their own officers and whether there are particular areas where the powers are used more frequently than others. However, the data cannot show the officers' notes, which limits the scrutiny of individual records.

¹⁷ Police and Criminal Evidence Act 1984. Available at: www.legislation.gov.uk/ukpga/1984/60/section/1

As a further response to HMICFRS' findings in 2015, the force has introduced additional operational checks and balances to monitor the use of stop and search powers, including detailed briefing material being circulated. We found a good level of supervisory oversight in the use of stop and search powers and evidence that records are checked by supervisors prior to submission. The stop and search champions across the force dip-sample stop and search records to ensure that they are accurate and contain reasonable grounds, and that the stop and search powers were used fairly and with respect. The addition of the visual analytical software has enhanced the force's ability to monitor and scrutinise a range of stop and search data and ensure that stop and search powers are used in a fair and transparent way. However, of the 200 stop search records HMICFRS examined, 133 were for drugs. Thirty-one 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, 102 were for possession of drugs alone. The force should evaluate the extent to which its activity in respect of drug searches reflects its priorities, to provide further reassurance to communities that its use of stop and search is fair and effective.

External scrutiny of stop and search powers to improve treatment

The force has an independent, external stop and search scrutiny group which meets quarterly to discuss stop and search encounters at force level. It has an independent chair, and a range of members from the local community and partner organisations. The force recognises that for the group to be more effective, it needs to include people from a more diverse range of backgrounds and ages. Members of the group have received stop and search training and have an opportunity to take part in the force scheme where members of the public can accompany officers and observe the use of stop and search powers. Any problems raised by the group are followed up by senior officers and the group is updated as to progress. For example, on occasions, scrutiny panel members have challenged the outcomes of some stop and search encounters, questioning if they were proportionate to the circumstances and what was found. In response, the force has provided the panel with a more detailed explanation of events, reviewed the circumstances of the stop and search encounters and fed back any learning to the relevant officers.

Although the independent scrutiny group has access to stop and search information and is given support by senior officers in interpreting data it currently only has access to redacted copies of stop and search records. This limits its ability to scrutinise trends, operations and individual misuse. If the panel is to be able to hold the force to account effectively then it needs to have access to the full range of data so that it can monitor all areas in more detail. As a consequence, the force is not maximising the benefits of open engagement and scrutiny in terms of ensuring the public is treated with fairness and respect.

Reasonable grounds for stop and search

The Police and Criminal Evidence Act 1984 (PACE) requires that, to stop and search a person, the grounds to suspect that person of being in possession of a stolen or prohibited article must be reasonable and that the grounds must be recorded on the stop and search record.

In HMICFRS' 2013 inspection into police use of stop and search powers,¹⁸ 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 Gloucestershire Constabulary, the 2013 inspection showed that 117 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,¹⁹ we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review of 99 records found that 23 did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records and found that ten 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 do suggest improvement but also 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 important to note 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 stop and search.

In 43 of the 200 records we reviewed, the item searched for was found. This is an important measure, because confirming or allaying an officer's suspicions is the primary purpose of the powers. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

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

	2013	2015	2017
Records not containing reasonable grounds	117 of 200	23 of 99	10 of 200
Item searched for found	–	–	43 of 200

¹⁸ *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/

¹⁹ *PEEL: Police legitimacy 2015* HMIC, 2016 Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

Summary of findings



Good

Leaders in Gloucestershire Constabulary clearly understand the principle of procedural justice and have taken steps to improve the extent to which all officers and staff treat the public with fairness and respect. Although the force has introduced some training, guidance and support for the workforce, it needs to complete its work in these areas to ensure that the workforce is fully effective in the future. We found that officers and staff had a reasonable understanding of the effect of personal bias and had received some guidance, but they had not been provided with specific training on how this could affect decision-making. However, the workforce have a good understanding of effective communication, particularly the importance of different communication techniques and styles when speaking to members of the community.

Through the use of well-developed internal scrutiny systems and external independent monitoring groups, the force can demonstrate that its workforce treats people with fairness and respect, and that it makes improvements when problems are identified. The use of force is consistently recorded, regularly monitored and scrutinised to improve overall understanding of its use. The force has a good level of understanding about the use of stop and search powers and it has improved how it records reasonable grounds to justify the lawful use of stop and search powers, though it still has more to do in that regard.

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,²⁰ as opposed to last year's focus on how well forces are guarding against corruption.²¹

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.²² Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.²³ 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

²⁰ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

²¹ 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/

²² *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_REPORT.pdf

²³ *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/

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

Leaders as ethical role models

Ethics and values are well established in Gloucestershire Constabulary and they guide leaders and in their decision-making. The Code of Ethics is established in the NDM, which is the primary decision-making process used across the force. The chief officer team role model the values expected of the workforce and reinforce these values during senior leadership events, through internal briefings and within training events. Details of chief officer gifts and hospitality, officer pay, rewards and business interests are made available on the force website. Additionally, the force values appear at the start of every weekly bulletin, and posters and key messages are widely displayed across the force, setting expectations on how the workforce and leaders must act ethically and lawfully. Values form part of selection and promotion processes to ensure that the values are consistently reinforced and understood by the workforce.

The force has an established ethics committee with an independent chair and diverse membership that includes members of the public and internal officers and staff. Any member of staff can seek advice from the committee through an established referral process. The ethics committee also reviews policy processes to establish if there are any ethical problems that need to be discussed. We found examples of staff having used the committee for advice and guidance on operational matters, though not all staff were aware of the committee, nor how to access it or its function. The terms of reference for the ethics committee were recently reviewed and changes made to create a register of all decisions made by the panel. A communications package is being developed on the force intranet site to promote the work of the ethics committee and it will be used to communicate topics for discussion and problems raised.

Ethical decision making

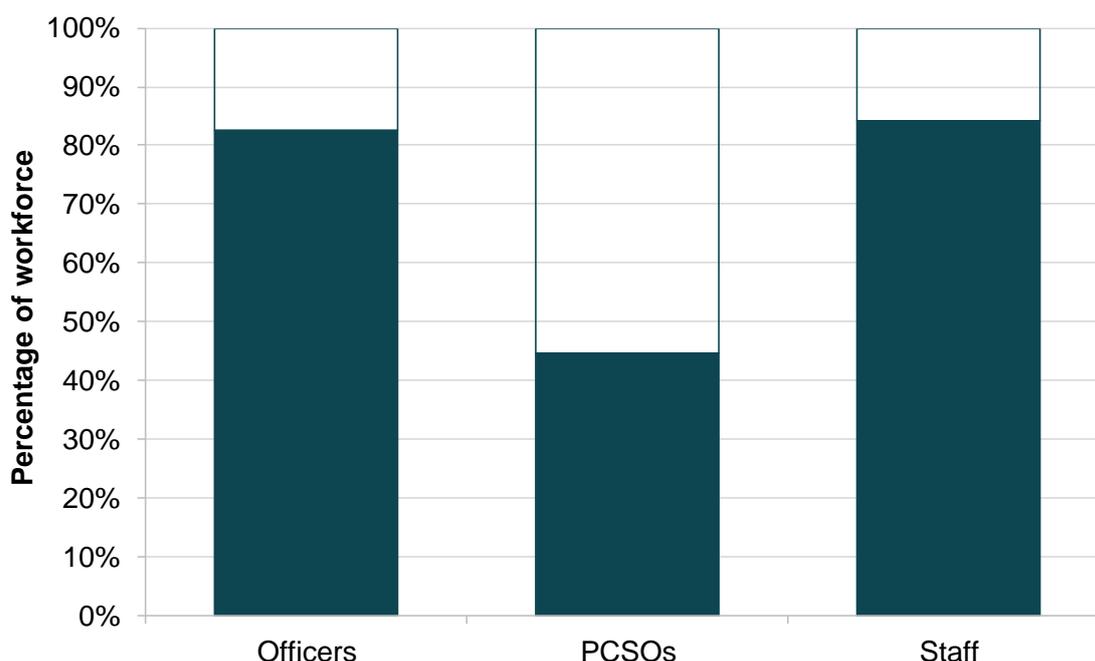
The force takes a strong ethical approach to decision-making. Ethical decision-making is understood by the workforce; the officers we interviewed all knew where to access the force's values, the Code of Ethics and what is expected of them as police officers. Training related to ethics and values, including the use of ethical dilemmas and the importance of making ethical decisions is provided to officers and staff. Staff have received training on the use of the NDM and we found that this was clearly understood by the workforce. The force policies and procedures support ethical decision-making, they are accessible to the workforce and are regularly reviewed to ensure they comply with duties under the Equality Act 2010 and reflect the Code of Ethics. Each is subject to an equality impact assessment, which assesses the effect of the policy to ensure it does not discriminate or disadvantage people.

Vetting

During HMICFRS' 2016 legitimacy inspection, we considered the extent to which the force was ensuring it was developing and maintaining an ethical culture through effective vetting. We found that the force was not complying with all aspects of the national vetting standards in that it was not routinely vetting all staff after a period of ten years had elapsed since their initial vetting. This meant that the force was not alert to the security risks that might be posed by staff who had not been vetted for a lengthy period. During this year's inspection, we assessed the force's plan for addressing these matters, and found that the force was in the process of re-vetting all staff and was well on the way to completing it. Vetting was being completed to a good standard and significant efforts were being made to complete the work to the National Police Chiefs' Council (NPCC) standard. All officers who transfer from other forces and all those appointed on promotion are re-vetted. The force's plan for addressing the problems is credible and achievable. The force informed HMICFRS that the percentage of employees who do not have up-to-date vetting clearance has reduced from around 40 percent in the last two years; as at 31 January 2017, the percentage of employees without security clearance was 19 percent. The force is aware of those individuals who do not hold the required clearance for their current role, and this is being addressed. To reduce the backlog, three additional vetting analysts have been recruited to the force vetting unit. This will considerably increase the force's capacity to ensure that all employees are vetted to the required standard and in line with national vetting standards.

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 Gloucestershire Constabulary 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, 83 percent of officers, 45 percent of PCSOs, and 84 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 Gloucestershire Constabulary 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

Gloucestershire Constabulary provides clear, useful and accessible information about how to make a complaint, and it is easy to find it on the force website. Complaints can be made by letter, phone call, email and social media such as Facebook, or through a form on the force website. A link to how to make a complaint is on the homepage under the contact us section. This includes information on the complaints process and can be translated into different languages. However, there is no information or advice if the person requires additional support assistance, for example, a translator, hearing, speech or eyesight assistance. We carried out a file review of 25 public complaints, and found three cases where complainants needed additional support. The files recorded that appropriate support had been provided in two cases. The force does not publish complaints data on its website or publish any changes it has made as a result of complaints and feedback from the public.

Information is available at the front counter of police stations on how to make a complaint; this includes posters and leaflets which are available in different languages. There are also leaflets and posters in some public buildings across Gloucestershire. The force has two mobile engagement vehicles which go to local community areas and events across the county where members of the public are encouraged to talk to local officers about problems or concerns. This has the potential to encourage those who may have less confidence in the police to provide feedback to the force or to make complaints which they might not otherwise make. One officer gave an example of the good work his team was doing to work with members of the community as a result of the stop and search procedures taking place in their area. This involved running focus groups and ensuring that the community was provided with information and guidance about how to contact the force if they had any problems or concerns. Targeted engagement has also taken place with the Polish and eastern European communities within Gloucestershire to build confidence and trust with the police. Community meetings have been held and information distributed in the appropriate languages, including information on how to make a complaint.

In summary Gloucestershire Constabulary can be considered as accessible for the purposes of making a complaint. Information and guidance is available in several languages, and the force has made a concerted effort to engage with those who have less confidence in the police, but it should provide information on how to receive additional assistance for those who need it.

In the ten months from 1 April 2016 to 31 January 2017, Gloucestershire Constabulary recorded 582 public complaint allegations against officers per 1,000 officers compared with 517 in the ten months from 1 April 2015 to 31 January 2016. These figures were both higher than the England and Wales averages in the respective period (414 in the most recent period and 428 in the previous period). The

higher number of complaints recorded in the force is accounted for due to the ethical recording of complaints and as a consequence of increased public engagement and the efforts taken to ensure that making a complaint easier.

Keeping complainants updated

As part of this inspection, HMICFRS examined 25 public complaint cases recorded by Gloucestershire Constabulary to see how well the force keeps complainants updated about the progress of their complaints, including the final outcome. We found that only 17 of the 25 complaint cases recorded regular updates to complainants, and that 16 of these were found to be sufficiently informative. All of the ten misconduct cases we examined recorded regular updates, with adequate detail given to witnesses and those who were subject of allegations.

When forces record public complaints, legislation requires them to provide the complainant with a copy of the complaint record. The IPCC statutory guidance extends this by stating that complainants should receive an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details). In 25 complaint files we examined, 24 contained evidence that all of these requirements had been complied with.

When public complaints are finalised, the force is required to provide the complainant with the findings of the report, its own decision and the complainant's right of appeal. We found that out of 25 complaint files, 24 contained evidence that all of these legal requirements had been complied with. This means that in Gloucestershire Constabulary the majority of complaints are investigated well, complainants are generally updated on progress and the final outcome is explained in a way that a complainant understands.

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

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

Identifying and responding to potential discrimination

Staff demonstrate a good understanding of the types of action that constitute discrimination together with the effects of such behaviour upon the public and colleagues. The majority of officers and staff we spoke to during this inspection had received training on discrimination and have a good understanding of the Equality Act 2010. Officers said that there has also been bespoke awareness training for both officers and staff about discrimination relating to the transgender community, where a lack of understanding was identified as potential discrimination.

The force has a satisfactory process in place to identify discrimination, although there is room for improvement. All complaints, both internal and external, are reviewed by staff from Human Resources (HR) and the PSD, who meet weekly. Trends and issues from complaints are also discussed at the force executive board in order to learn and make changes if required. As part of the case file review, HMICFRS looked at ten complaints that had been identified by the force as containing an allegation of discrimination. We also looked at 15 other complaints that we considered might contain unidentified allegations of discrimination. We found that two of these other complaint cases contained allegations of discrimination which the force had failed to identify. We also looked at ten internal misconduct cases that we considered might contain unidentified allegations of discrimination and did not find any additional cases that the force had failed to identify. The force also correctly refers cases regarding potential discrimination to the IPCC. We found that one complaint case that the force had identified as containing an allegation of discrimination met the IPCC referral criteria, and that it had correctly been referred to the IPCC. Allegations of discrimination are handled in a timely way, providing necessary support to complainants, witnesses and those who are the subject of allegations.

The force is developing a diversity strategy to improve the service it provides to the public. The diversity development group meets regularly and is chaired by the deputy chief constable (DCC). The people working group has overall managerial responsibility for this diversity strategy, and they regularly review and scrutinise the work. The force is also providing guidance to officers and staff to enable them to understand and respond more positively to people who are more vulnerable, for example, the force has appointed a dedicated hate crime co-ordinator who is working to improve how victims of hate crime are dealt with by the police. Many officers we spoke to described how the recent initiatives guidance and training had improved their understanding of discrimination and said they had changed their behaviour as a consequence.

Investigating allegations of discrimination

Gloucestershire Constabulary investigates cases of discrimination well.

Two investigating officers within the professional standards department (PSD),²⁷ a detective inspector and detective sergeant, have attended IPCC discrimination training and have the knowledge, skill and experience to be able to effectively apply the IPCC guidelines for handling allegations of discrimination.

We looked at ten public complaint cases that the force had recorded as containing an allegation of discrimination. We found that although six of the cases had been investigated by non-PSD staff, all of these cases had been investigated satisfactorily and in accordance with the IPCC guidelines for handling allegations of discrimination. We also considered whether, overall, the complainant making an allegation of discrimination received a good service from the force: we found that all complainants did receive a good service from the force.

Summary of findings



Good

Ethics and values are well established in Gloucestershire Constabulary and used by leaders in their decision-making. Policies and procedures support this ethical approach and the chief officer team reinforce their expectations on how the workforce and leaders must act ethically and lawfully. There is an established ethics committee which has an independent chair and a process for referring ethical dilemmas for discussion. Ethical decision-making is understood by the workforce, and we found that officers and staff had a good understanding of the force values, the Code of Ethics and what was expected of them.

Complaints are investigated well, including where discrimination is identified, and complainants are generally provided with updates on the progress of the investigation in a timely way. The force provides information on how to make a complaint which is easily accessible and informative; however, more could be done to ensure that people who need additional assistance are provided with the information and support they need.

²⁷ The professional standards department within the force ensures professional standards are maintained. This includes the investigation of complaints and misconduct and expressions of dissatisfaction, the handling of civil claims, information management and health and safety problems.

Area for improvement

- The force should do more to ensure that people who need additional assistance with making a complaint are provided with the information and support they need.

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.²⁸ 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.²⁹ HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances³⁰ – to identify, understand, prioritise and resolve their workforces’

²⁸ *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

²⁹ *Ibid.*

³⁰ 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.³¹

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.³² 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.³³

Leaders seeking feedback and challenge from the workforce

Gloucestershire Constabulary has made progress in the way leaders seek feedback and challenge from the workforce since our 2016 inspection, when it was assessed as requiring improvement in the extent to which it treated the workforce with fairness and respect. Improvements have been made in the way decisions are communicated and staff are becoming more actively involved in a variety of forums and processes to provide feedback to senior leaders. All teams have a staff involvement forum to feed back any concerns, problems or promising practice to senior leaders. Staff perceive these forums as a good mechanism to suggest ideas and provide feedback to senior leaders as to how well processes are working. For example, problems raised at the staff involvement forum have led to changes in the way non-emergency calls are answered in the force control room. Non-emergency calls are now diverted from teams experiencing high levels of demand to teams with the capacity to answer them quickly. This has resulted in more calls being answered and has reduced the time callers are waiting for the call to be answered.

The force has taken a more proactive approach to reporting the results of both the annual staff survey and interim surveys. Staff responses are used to assess in workforce opinions. A summary of results together with the detail behind the

³¹ *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

³² 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

³³ 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/

summary is made available to all staff. This year, the force plans to discuss the staff survey results at internal focus groups and workshops to ensure that staff understand the matters raised and are involved in the development of action plans. There have also been interactive sessions with groups of staff using voting buttons, allowing them to give feedback about the effectiveness of actions taken. For example, feedback from staff through the 2016 survey and through the leaders' forum identified that there were underlying problems concerning the transparency of the decision-making process of the force resources and deployment meeting (FRDM), in particular the way decisions were communicated to staff. As a result, the feedback given to staff was improved, and now includes a detailed rationale as to how and why decisions are made. Feedback from the interactive sessions has also influenced the work of the wellbeing working group, clearly identifying the services the staff need to feel supported by the organisation.

The force has a new chief constable who is embarking on a two-month tour of the workforce called the 'big conversation', where he plans to outline the development of the new corporate strategy, take feedback from the workforce and discuss any matters of concern. This will not only allow the chief constable to explain his plans for the future, but it will also mean that the chief officer team can receive feedback from the workforce about the problems that matter to them. Each member of the workforce has been asked to contribute to an initiative to identify the 100 things that present a barrier to them working effectively.

Identifying and resolving workforce concerns

Gloucestershire Constabulary has made progress in the way it identifies and resolves workforce concerns since the 2016 HMICFRS legitimacy inspection. In last year's inspection, the force was assessed as requiring improvement in the respectful treatment of its workforce. Confidence has since improved in the way in which workplace concerns are addressed. Staff have confidence in the decisions of their line managers and supervisors who authorise leave and time off in an unbiased way, and supervisors feel more supported when making decisions.

The way the force identifies and resolves workforce concerns is structured and clearly understood by the workforce. The force has a 'fairness at work' (FAW) process to manage grievances. All grievances raised by staff are reviewed and any problems of perception are identified. As a result improvements have been made to the way in which decisions are communicated to staff and these now contain a more detailed supporting rationale. The officers and staff we spoke to perceive this process as being fair. We reviewed ten FAW cases. In most cases, there was evidence that matters raised had been expeditiously and effectively managed, and that outcomes had been achieved, largely at the first stage of the process. However, there were some examples where cases had extended to the appeal stage and the appeal outcome manager(s) had identified failings in the original enquiry. Although we only reviewed a small sample, this does highlight a general training/development

problem that should be addressed by the force. The form used to report FAW problems does not contain a field to record protected characteristics. Such an inclusion would provide opportunities to identify potential hidden discrimination more readily.

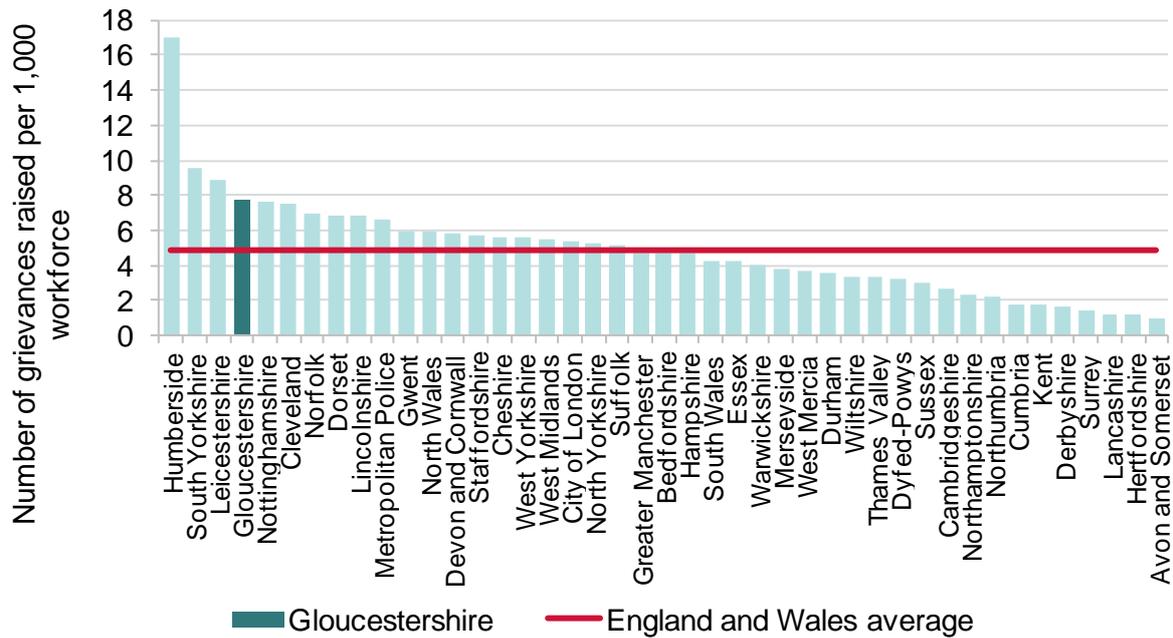
All fairness at work complaints are reviewed and recurring themes that affect the perceptions of fairness and respect are identified. The executive board and other groups, such as the wellbeing group, review problems and ensure action is taken to address any underlying causes. For example, the force has improved the way it communicates with complainants who are now provided with additional detail and a clear explanation supporting relevant decisions.

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 Gloucestershire Constabulary had 7.8 grievances raised per 1,000 workforce. This is higher than the England and Wales average of 4.9 grievances raised per 1,000 workforce.

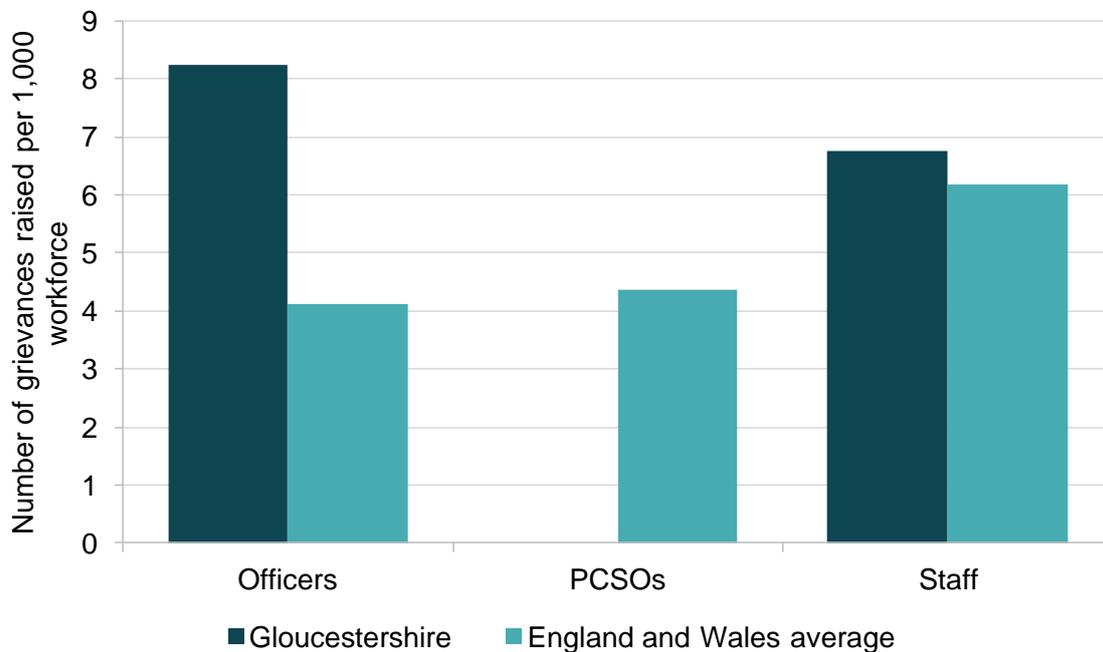
Figure 4 shows that the number of grievances raised by officers in Gloucestershire Constabulary was 8.3 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period PCSOs raised no grievances, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 6.8 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary in the ten months from 1 April 2016 to 31 January 2017



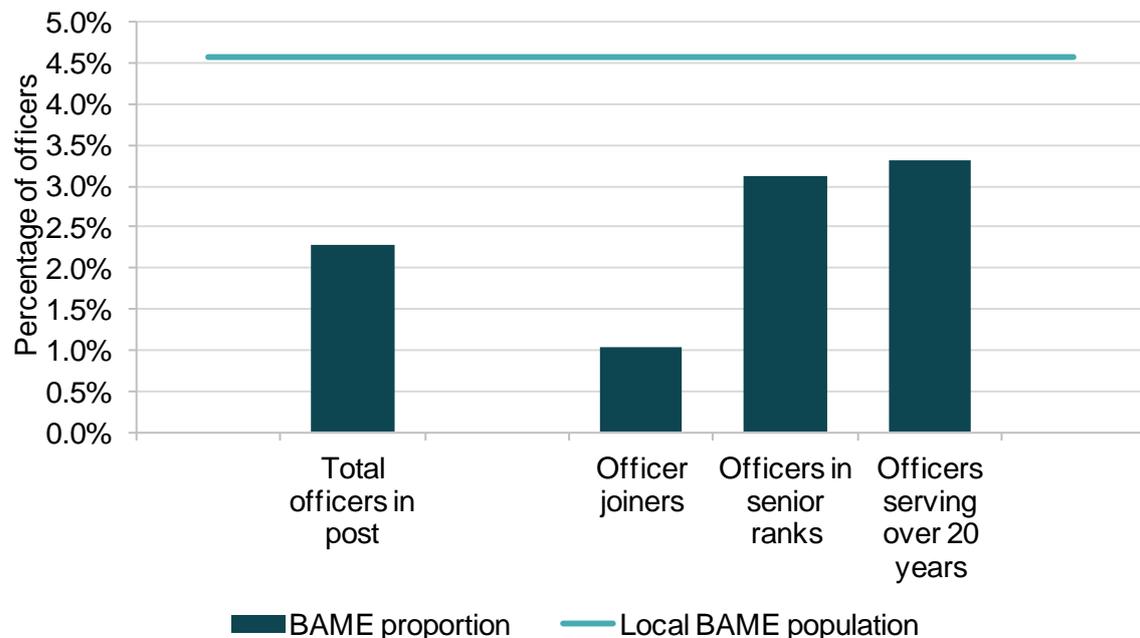
Source: HMICFRS Legitimacy data collection

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 Gloucestershire Constabulary, the 2011 census indicates that BAME people made up 4.6 percent of the local population. In 2016/17, in Gloucestershire Constabulary 2.3 percent of officers were BAME (see Figure 5). In relation to officers, 1.0 percent of those joining the force, 3.1 percent of those in senior ranks and 3.3 percent of those who had served over 20 years were BAME.

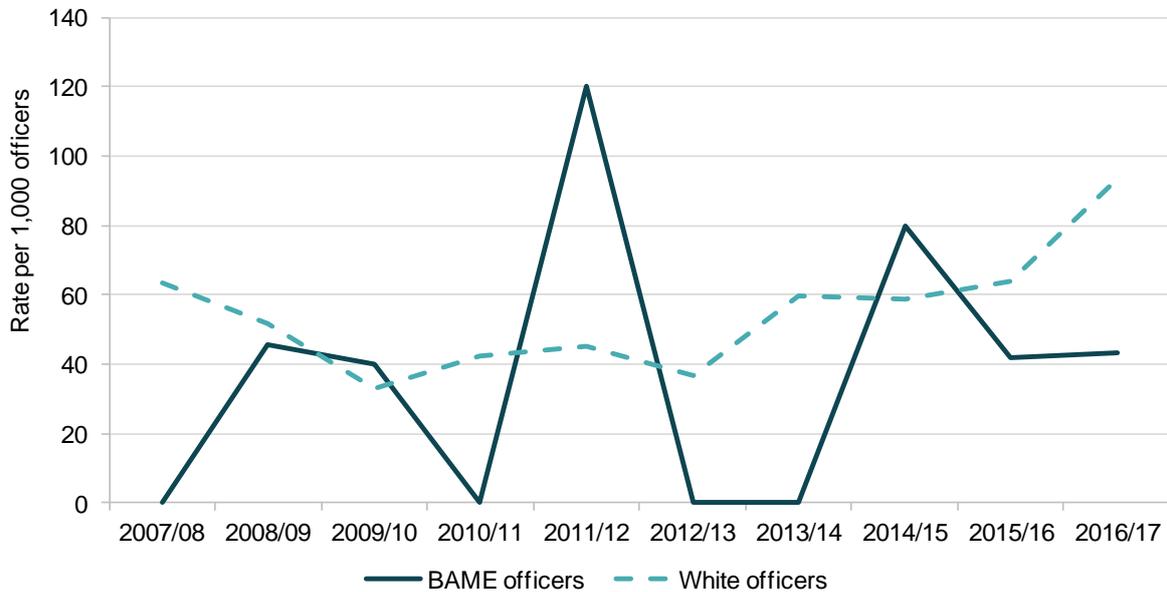
Figure 5: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Gloucestershire Constabulary in 2016/17, compared with the percentage of BAME people in the local population



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 Gloucestershire Constabulary from 2007/08 to 2016/17

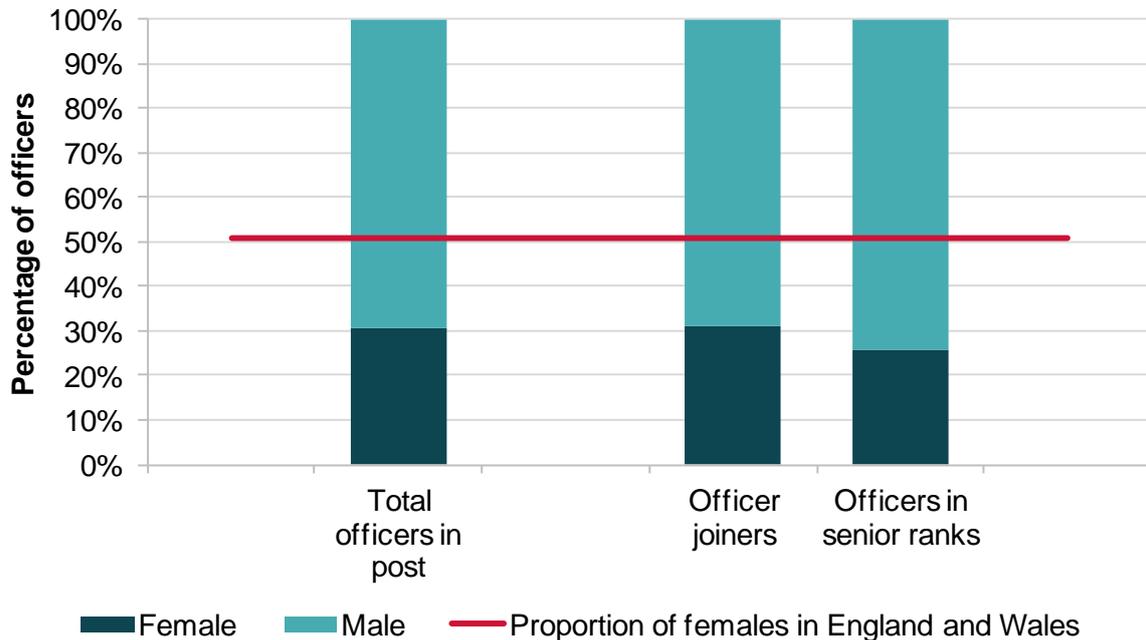


Source: Home Office Annual Data Requirement

In 2016/17 in Gloucestershire Constabulary for the equivalent of every 1,000 BAME officers, 43 left the force (see Figure 6), while for every 1,000 white officers 93 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

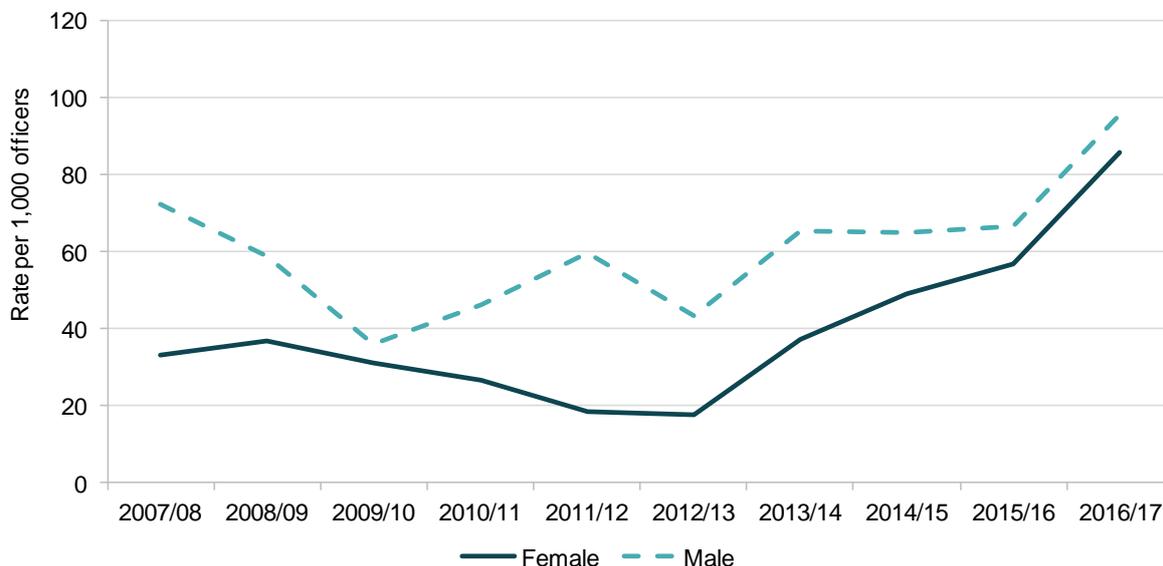
The proportion of female officers is lower than the proportion of females in the general population (51 percent) at 31 percent. In the 12 months to 31 March 2017 in Gloucestershire Constabulary, 31 percent of those joining the force and 26 percent of those in senior ranks were female (see Figure 7).

Figure 7: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Gloucestershire Constabulary 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 Gloucestershire Constabulary from 2007/08 to 2016/17



Source: Home Office Annual Data Requirement

In 2016/17 in Gloucestershire Constabulary 86 female officers per 1,000 officers left the force, compared with 96 male officers per 1,000 officers. The force has a good understanding of the importance of addressing disproportionality in the recruitment, retention, progression and complaint and misconduct allegations for officers and staff

with protected characteristics. It actively monitors and reviews a range of information which allows it to identify any problems of disproportionality, and action is taken to rectify them.

The force has made a considerable effort to encourage people from different communities to join the police. As a result of a lower than expected number of applications from the BAME community during its 2016 recruitment campaign, changes were made to the recruitment exercise run in January 2017. A Twitter campaign focused on harder to reach communities to address the under-representation of candidates from BAME backgrounds. The force communicated a positive recruitment statement together with an adjustment of the entry qualifications in order to attract a more representative profile of applicants. The force also reviewed and adjusted the competency-based questions used in the assessment centre process to ensure barriers to employment were removed. Although this did not have the desired effect of attracting applications from the BAME community, it did result in an increase in the number of women and white minority ethnic people applying. The force has assessed its recruitment processes and acknowledges that further work is needed to attract more applications from BAME communities; it is learning from other forces, business and industry to ensure its recruitment methods are accessible to a wide range of the community.

Development opportunities are available to help retain staff and prepare them for promotion where appropriate. For example, the force control room (FCR) has introduced a specific career pathway, with the potential to take NVQ qualifications at levels 2 and 3 in customer care and also there are plans to introduce the NVQ management qualification at levels 4 and 5 through the apprentice levy.

The force actively monitors and reviews BAME officers and staff who are subject to complaint and misconduct allegations. The numbers are small and no disproportionality has been identified. The force has clear policies and guidelines in place and these provide the workforce with confidence in the force's ability to deal with perceived unfairness.

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.³⁴ 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

Gloucestershire Constabulary continues to develop its understanding of the benefits of workforce wellbeing. There is an established wellbeing board chaired by the chief constable and a wellbeing working group which works to improve wellbeing provision and awareness. Leaders prioritise wellbeing by ensuring there is no delay in accessing services. Wellbeing is discussed by the executive board to ensure that chief officers understand the health of the workforce, any trends and the accessibility of services available. The working group provides the practical elements; it is a diverse group of enthusiastic champions who come from a range of backgrounds and departments within the force.

Most officers and staff we spoke to were able to recall key messages given by the chief officer team promoting the importance of wellbeing and highlighting the services available. They perceived there to be a good level of help and support available and generally consider that their wellbeing is a priority for the force.

Identifying and understanding workforce wellbeing needs

Gloucestershire Constabulary has a good understanding of the risks and threats to the wellbeing of the workforce, which include high workloads and lack of consultation. It has examined the threats and risks and their underlying causes, including a focus on mental and emotional wellbeing. The force has good mechanisms in place to monitor sickness, the number of rest days worked and any time worked in lieu. This information is reported to the wellbeing board and any problems are raised with individual line managers or department heads. In addition, a detailed force wellbeing profile was produced in April 2017, using the staff survey

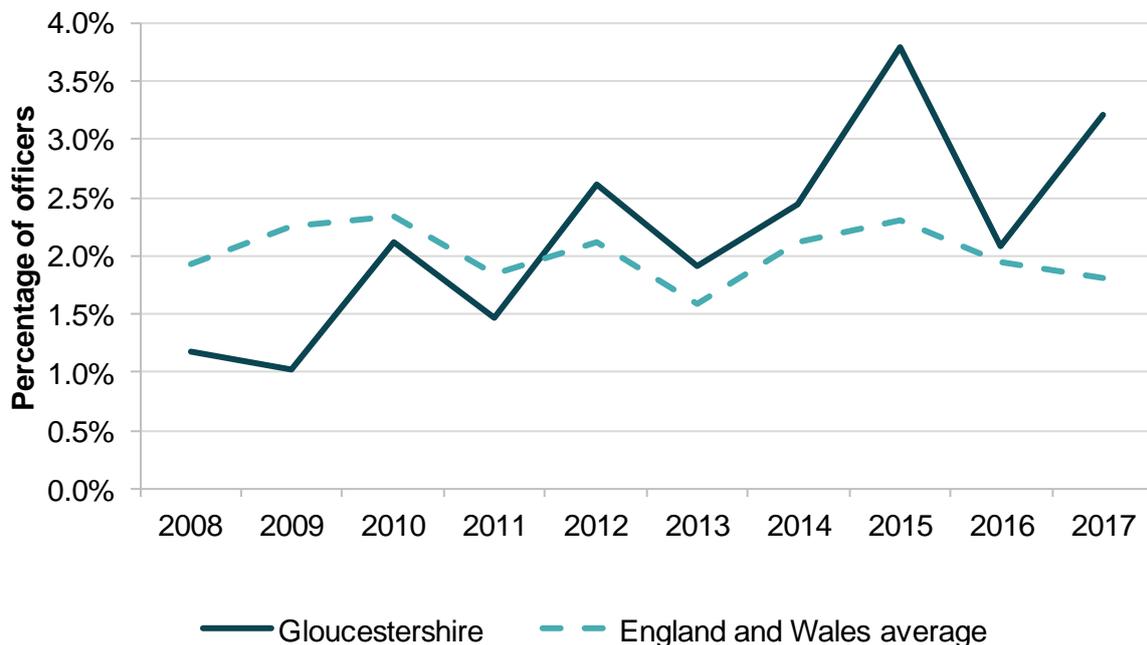
³⁴ *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: <https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/> Also see <https://fitforwork.org/employer/benefits-of-a-healthy-workforce/>

results, exit interviews when people leave the force, and an analysis of a range of activities, including health assessments. This has provided the wellbeing board with an overall picture of the underlying risks to wellbeing and ensures action is taken to address them.

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 Gloucestershire Constabulary, 3.2 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 an increase of 1.1 percentage points from the previous year, which is in line with changes in the last ten year period (see Figure 9).

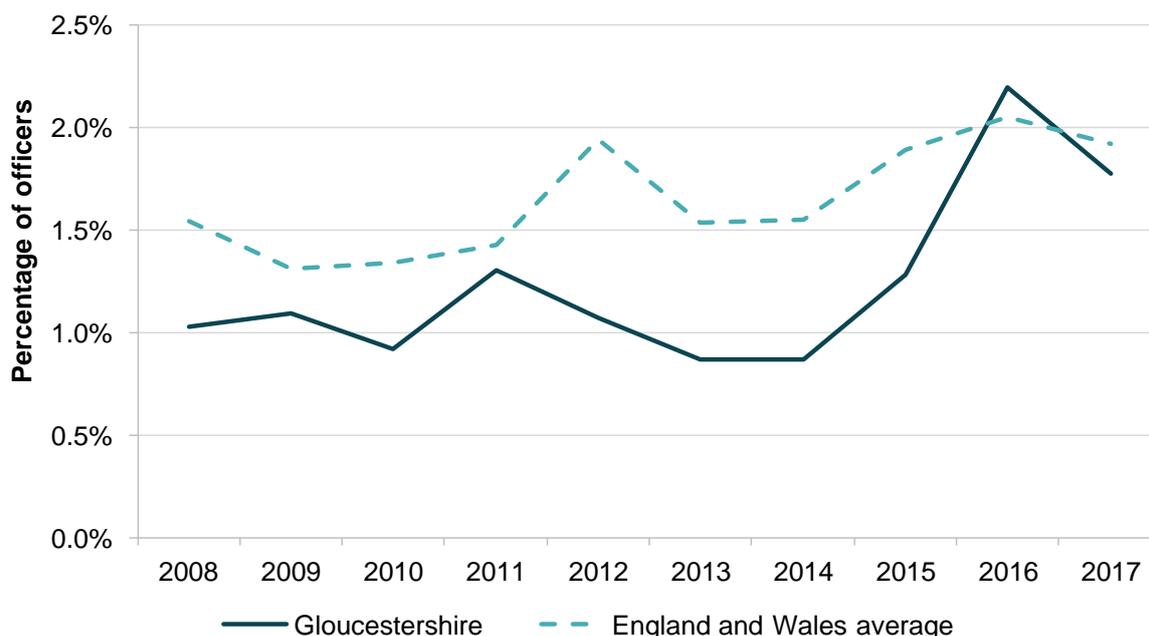
Figure 9: Percentage of officers on short or medium-term sick leave, in Gloucestershire Constabulary compared with the England and Wales average, on the 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in Gloucestershire Constabulary on long-term sick leave was 1.8 percent and the England and Wales average was 1.9 percent. The latest year for which data were available is 2017 which saw a decrease of 0.4 percentage points from the previous year, which is a notably larger decrease than in the previous ten-year period.

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



Source: Home Office Annual Data Requirement

Taking preventative and early action to improve workforce wellbeing

Gloucestershire Constabulary is good at taking preventative and early action to improve the wellbeing of the workforce. There is a range of options for welfare support to improve workforce wellbeing and supervisors are equipped to recognise individual warning signs and to take early action to prevent further escalation. Supervisors have a wellbeing objective included in their annual performance development review (PDR) and a consultant from HR is allocated to each team to support managers in identifying matters that may indicate a welfare concern. An improved awareness of mental health with an emphasis on early intervention has been achieved through workshops for managers provided by the Blue light mental health unit and the wellbeing working group. This means that supervisors and managers are well informed and able to spot the early signs and symptoms of mental ill health and stress. Reports of any stress or mental health related illness are immediately referred to occupational health. The force will also be running specific events across the force area in May 2017 as part of the national mental health awareness week.

The force intranet contains information on how staff can find and access a range of health and other support services. During our inspection, we found that officers and staff were generally aware of and had a good understanding of how to access the services available. In 2016, we found the use of the designated trauma risk incident

management³⁵ process was not always available and was used inconsistently. Some progress has been made since the last inspection with a review of existing arrangements. An application for additional support is now being advanced by means of a business case. As an interim solution, any welfare problems are monitored by managers who follow a seven-point plan to ensure that appropriate support is available. Counselling services are available and managers receive additional support from the occupational health (OCH) unit and HR consultants.

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 effect on workforce perceptions of fairness, and this in turn may lead to negative attitudes and types of behaviour in the workplace.³⁶ 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.³⁷ 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

Gloucestershire Constabulary has made some improvements since HMICFRS' 2016 legitimacy inspection, which identified that improvements were required in the management of individual performance. In this year's inspection, we found that the force performance development review (PDR) for officers and staff is fair but could be more effective. PDRs are mandatory for all staff; the Policing Professional

³⁵ Trauma Risk Management (TRiM) is a peer-delivered psychological support system to support colleagues following a traumatic event. Personnel are qualified as TRiM practitioners and are trained to conduct specialised risk assessments.

³⁶ *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.

³⁷ 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

Framework (PPF) is used and includes an element of continuing professional development (CPD). Dip-sampling and scrutiny take place to ensure they are unbiased and fair, including for people with protected characteristics. The force is working to improve the management of individual performance, and officers and staff are beginning to use a new system that assesses individuals fairly and accurately. However, the staff we interviewed as part of this inspection told us that they feel the PDR process is not yet effective and that further improvements are needed before skill and competence can be developed and before they can ultimately value the process. The force has well-developed plans to address this matter and ensure that the process is more effective and contributes to continuous professional development. The deputy chief constable has set out the standards required for the next reporting year, starting on 1 May 2017, to ensure PDRs will be used in the recruitment and promotion process and to develop staff skills. Officers and staff will be encouraged to have regular conversations with their supervisors to assess and manage performance, and this supports continuous professional development. To achieve these improvements, support is being made available for supervisors and managers from their allocated HR consultant, and some managers have already been trained in its use. HMICFRS will monitor how this has progressed during next year's inspection.

In comparison to other forces, the force has a lower use of unsatisfactory performance procedures (UPP). The force considers its use of UPPs is appropriate and the officers and staff we spoke to during this inspection said that the force deals with underperformance well. Underperformance is identified early by supervisors and action is taken which allows the officer or member of staff to improve their performance.

Identifying potential senior leaders

In last year's inspection, we reported that Gloucestershire Constabulary should enhance its leadership programme to include the introduction of a structured talent management scheme within which to nurture and develop officers and staff who have the potential to become future leaders. This year, we found that the force has made good progress by building on its leadership expectations. It has established a leadership programme which is based on the College of Policing's Guiding principles for organisational leadership.³⁸ A process has been developed whereby the force executive board identifies those officers and staff who have high potential. Nominations are taken from a variety of sources, including line managers, PDR assessments and applications for promotion. Individual development needs are identified and a programme of development put in place. This includes the potential for coaching and mentoring. To support officer and staff development, and to allow officers and staff to gain valuable leadership experience, the force encourages staff

³⁸ Available from: www.college.police.uk/What-we-do/Development/Promotion/police-leadership-guiding-principles/Documents/Guiding_principles_for_organisational_leadership.pdf.

access to a range of secondment opportunities both internally and with external organisations such as HMICFRS, the College of Policing, and in other regional forces as part of a regional collaboration programme. The force also encourages attendance at the national senior leadership programme (SLP) run by the College of Policing.

The force has a clear succession plan in place to replace senior leaders who are due to retire within the next year. There is a survey which encourages inspectors and above and the equivalent support staff rank to identify their skills, talent and leadership potential, but this is not open to those below the rank of inspector. For those below the rank of inspector and equivalent grades, we found that officers and staff were unclear on access points to the leadership programme and on the process of talent identification. The force needs to improve its communication to all staff about the benefits of the leadership programme and how they can access it.

Selecting leaders

The force has reviewed its recruitment and promotion process to ensure fairness and accessibility. Selection processes are reviewed to avoid discrimination and to ensure accessibility for all potential candidates. A structured assessment centre process is used and reviewed against industry best practice and all police officer and police staff vacancies are advertised externally. In last year's inspection, we noted that the introduction of the assessment centre process and the opening of vacancies to external candidates were not popular among the workforce. As a consequence, the force had seen a considerable increase in fairness at work complaints related to the promotion process. To address workforce concerns, specific development sessions were introduced for officers and staff to improve their understanding of the assessment centre process, help them prepare and improve their performance. Candidates now receive more detailed feedback on their performance which includes information on their areas for personal development. In this year's inspection, we found increased confidence in the promotion process among officers and staff, who perceive the process to be fair and accessible. A recent selection process for Inspector rank promotion resulted in a higher number of successful internal candidates.

Summary of findings



Good

Gloucestershire Constabulary is good with regard to treating its workforce with fairness and respect. Leaders have a good understanding of workforce perceptions through the use of staff surveys and feedback from other sources. Good progress has been made since last year's inspection on sharing the results of staff surveys. There is a process in place to engage staff in shaping the resolution to problems raised. There are some good initiatives in place to promote a preventative approach to wellbeing and a wellbeing profile has been developed to identify the underlying matters affecting the wellbeing of the workforce. The force has well-developed plans to introduce a performance development review process to ensure that it is fair and effective. Recruitment and promotion processes are clear and understood by the workforce and the force has introduced changes which are starting to have an effect on the perceptions of fairness.

Area for improvement

- The force should improve its communication to all staff about the benefits of the leadership programme and how they can access it.

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 staff³⁹. 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).

³⁹ 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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 Gloucestershire Constabulary 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.⁴⁰ 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

⁴⁰ 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 practice⁴¹ 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?

⁴¹ 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.