

PEEL: Police legitimacy (including leadership) 2017

An inspection of Gwent Police



December 2017

© HMICFRS 2017

ISBN: 978-1-78655-496-3

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?	10
To what extent does the force understand the importance of treating people with fairness and respect?	10
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?	29
How well does the force identify and act to improve fairness at work?	29
How well does the force support the wellbeing of its workforce?	36
How fairly and effectively does the force manage and develop both the performance of its individual officers and staff and its selection processes?	40
Summary of findings	43
Next steps	44
Annex A – About the data	45

Introduction

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

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

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

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

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

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

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

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

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

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

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

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

A separate report on the force's efficiency inspection findings is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2017/gwent/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/gwent/.

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

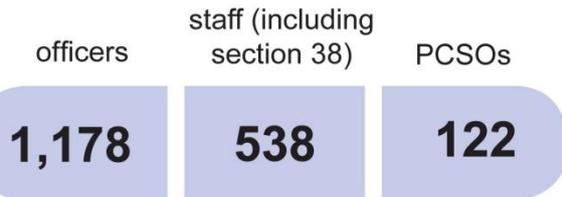


Workforce

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

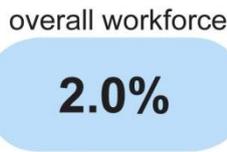
1,838

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



Ethnic diversity

Percentage of BAME in workforce 31 March 2017



Percentage of BAME in local population, 2011 Census



Gender diversity

Percentage of females in overall workforce 31 March 2017



Percentage of females by role 31 March 2017





Grievances

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

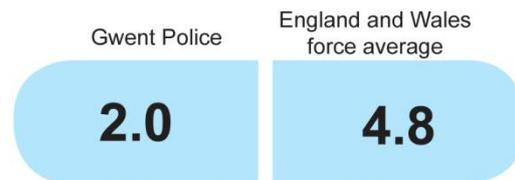


Stop and search

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

1,143

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



Gwent Police is judged to be good at how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we looked at this year, our overall judgment is the same as last year. The force is judged to be requiring improvement at treating all of the people it serves with fairness and respect but judged as good at ensuring its workforce behaves ethically and lawfully and 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?



The force prioritises the ethical behaviour of the workforce and supervisors play an active role in ensuring that standards are maintained. To reinforce this, the force has put a programme in place to simulate incidents that test the principals of ethical decision making. Known as ‘ethical dilemmas’, front line staff talk through hypothetical scenarios with supervisors to discuss how best to ensure that the force’s reputation is not undermined.

Leaders in Gwent Police have a limited understanding of the importance of treating all the people they serve with fairness and respect. This is reflected in a lack of understanding of skills of Gwent Police’s workforce and shortcomings in arrangements for external scrutiny. Its monitoring of the use of coercive powers is

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

too limited in scope to identify and respond effectively to individual and organisational concerns. These include uncertainty regarding the legal grounds necessary to stop and search members of the public.

The force provides information to the public about how to make a complaint, and is good at keeping complainants updated on the progress of their complaints. The force has effective knowledge and processes in place to identify, respond to and investigate allegations of discrimination.

Force leaders provide a range of channels to seek feedback and challenge from its workforce. The force takes action in response to issues raised, and informs the workforce accordingly. The force has a well-established and effective health and wellbeing strategy that is supported by a range of practical measures to promote physical and psychological wellbeing, and to take preventative and early action to address wellbeing concerns. The force has provided training for supervisors and has a well-understood policy for providing wellbeing support. It has seen reductions in short and medium-term sickness as a result. The force is beginning to improve how it manages and develops the individual performance of its officers and staff, but the process does not yet have credibility among much of the workforce. The force has an established process for identifying high-potential candidates, based on line manager support, application forms and interviews, and is in the early stages of identifying high-potential members of the workforce.

Areas for improvement

- The force should regularly and frequently review Body Worn Video footage as part of its scrutiny process for improving the way it uses stop and search.
- The force should put in place independent external scrutiny of its use of stop and search and ensure reviews are conducted more frequently.
- The force needs to develop and put in place more comprehensive analysis of its stop and search data.
- The force needs to comply fully with the national recording standard on the use of force.
- The force should ensure that officers and supervisors likely to use stop and search powers understand what constitutes reasonable grounds.
- The force should ensure it complies with all aspects of the current national guidelines for vetting and has a renewed vetting action plan.
- The force should ensure its gifts and hospitality register is up to date.

- The force should ensure that it has force specific literature in police stations and other public places on how to make a complaint in line with IPCC statutory guidance. In particular this should focus on communities with less confidence in the police.
- The force should review how high potential members of the workforce are selected for leadership development.
- The force should take steps to ensure selection and promotion processes are transparent to improve the perception of fairness of officers and staff.
- The force should continue to develop an effective system for managing individual performance to improve the perception of its value by officers and staff.

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

Leaders in the force demonstrate that they understand the importance of treating people with fairness and respect. The force has a clear set of values: to be caring, fair, trusted, responsive and professional. The force has made comprehensive arrangements to provide the workforce with the knowledge and training required to treat the public with fairness and respect. For example, the force's performance framework includes priorities relating to fairness. It has developed training for frontline officers and staff, the force leadership team and others that sets out how to recognise and offer the right level of support to members of the public and to treat them fairly and with respect. Training in unconscious bias has also been provided and staff told us how their greater level of understanding had changed their approach when dealing with people. Officers told us that it had made them think more broadly about the root causes of someone's behaviour and as a consequence, made them respond in more tolerant and supportive ways. Leaders in the force demonstrate that they understand the importance of treating people with fairness and respect. The force's aim is to protect and reassure through its values of being caring, fair, trusted, responsive and professional.

The force held a one-day session with contributions from behavioural insight experts that focused on identifying bias within organisational processes, including recruitment and promotion. The session was also attended by the executive director of the Muslim Women's Network whose work includes challenging media and societal portrayals of Muslim women. Around 80 senior leaders (police officers and police staff) participated in the day and took part in an exercise prior to the event that tested bias against gender and leadership, ethnicity and tattoos. The day culminated in individual and group exercises where participants identified areas of work that could potentially be influenced by bias, and personal, leadership and organisational actions that could be taken to mitigate these. The force plans to use the findings from the day to inform further work on unconscious bias in 2017/18.

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>

Understanding of unconscious bias

The force has provided a range of unconscious bias events to frontline staff, including training facilitated by a leading chartered psychologist who specialises in this area. Officers and PCSOs we spoke to said their decision-making when dealing with the public has benefited from the unconscious bias training. They told us they now understand, for example, the effect of social deprivation on the behaviours of people from difficult or disadvantaged backgrounds, and are more tolerant and empathetic. One PCSO told us they now felt more confident to advise members of the public who have concerns relating to youths from different backgrounds.

Communication skills

Gwent Police understands the importance of effective communication. The workforce have received training and guidance in communication skills to improve their interactions with the public, primarily as part of officer safety training which includes a section on effective communication as a tactic that can reduce conflict, tension and sometimes avoid the need to use force altogether. The intention of applying such methods is to try and resolve situations without resorting to force, by listening to people and displaying empathy and understanding. Officers and PCSOs use this training to assist them in de-escalating potentially violent situations and when dealing with incidents such as those that involve drunken behaviour and public disorder.

Some officers and PCSOs told us they are using their communication skills when dealing with people whose behaviour is unacceptable. Highlighting that they are wearing body-worn video cameras and declaring that people could be filmed has proved effective in discouraging further inappropriate behaviour.

Use of coercive powers

Gwent Police provides training in the use of force, stop and search and in unconscious bias. Last year we found strong evidence that officers and staff had been trained in, and demonstrated a good practical knowledge of the National Decision Model and the Code of Ethics. Use of force training has been provided to all front line officers as part of the officer safety package and this is delivered alongside a series of ethical dilemmas to enhance fair decision making. As a result of this range of training, many officers have gained a good understanding of how to use force and their stop and search powers fairly and respectfully, and are able to make sound decisions relating to the necessity test for making an arrest.

The force intends to improve its scrutiny of a more comprehensive set of data, including routine examination and dip-sampling of body-worn video, which is not currently taking place. In 2015 we found that the force's methods of selection and training of Taser officers were measured and consistent, and HMICFRS considered the force's Taser use was fair and appropriate. Taser-trained officers had a good understanding of the National Decision Model, but more work was needed to ensure its use was properly recorded on the Taser forms.

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 force⁹ 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,¹⁰ 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

In 2015 we found that the force needed to do more work to ensure that instances of Taser use were properly recorded. As part of our wider inspection of use of force this year, we were disappointed to find that Gwent Police still needs to do more work to ensure that use of force is properly recorded. Gwent Police is currently unable to comply fully with the national minimum recording standard on the use of force because of an ICT problem which means that officers are unable reliably to send these data through their devices to record those circumstances when they have used force. At the time of the inspection the force, having recognised this, had removed the use-of-force form from mobile data devices until the ICT problem is resolved. As an interim measure, officers are completing handwritten records.

The force holds a monthly 'use of force' board meeting. The board's membership includes a member of the independent advisory group. However, the range of data scrutinised by this board is limited and, following a recent review of the use of force report facility on its mobile digital devices, the force concluded that the form is not being used consistently by officers when they are required to do so. The force also recognises that some of the fields that officers are required to complete could be amended to enable better analysis of trends and patterns, such as details of persons

⁹ 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/

¹⁰ *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

searched, including protected characteristics such as ethnicity and age, or vulnerabilities such as mental health problems. Work is currently underway with the force's ICT department to improve the availability of the form on mobile devices and new guidance has been issued reminding officers of their responsibilities to complete the required documentation in every case where force has been used. Forces that do not record the minimum data required by the national recording standard, and monitor them comprehensively, are likely to have an impaired ability to identify and remedy unfair and inappropriate uses of force.

External scrutiny to improve treatment

The force encourages external scrutiny to improve the extent to which it treats people with fairness and respect through its force-level independent advisory group (IAG). The IAG has an independent chair and a well-trained and diverse membership which includes young people. HMICFRS observed a 17-year-old IAG member who was encouraged to take part in activities such as stop and search dip-sampling and the stop and search 'ride along' scheme. Members of the IAG are confident in challenging the force and HMICFRS observed both positive engagement with the process and the provision of meaningful responses to matters that were raised. These included suggestions by one IAG member, who took an active role in the meeting, on how to improve the force's engagement with the community over stop and search, particularly of young people. Sub-groups of the IAG examine discrimination cases, calls for service to the 101 number and domestic abuse cases. IAG members have listened to domestic abuse calls and dip-sampled police logs that may relate to hate crime incidents. If officers or staff have not dealt with the public in a fair and respectful way, the IAG provides feedback with a view to improving their approach.

Last year we found that the force was good at listening to, and acting on, feedback from independent custody visitors on the treatment of people in detention. The force makes good use of its ethics committee which consists of members of the public who provide assurance and advice and comment upon ethical issues, including governance and operational matters. HMICFRS observed the committee being presented with ethical dilemmas which it discussed, providing its conclusions and recommendations to the chief officer team for consideration and decision. All decisions are then published.

Gwent Police also has various other ways in which it encourages and responds to external scrutiny and challenge. The force has a 'rate our service' facility on its website where members of the public can provide feedback on their experience and rate the service provided by the force. The force responds by publishing what it has done about negative feedback. A new website was scheduled to go live in April 2017 with a 'Contact Us' tab available on the main header of the home page which links to a 'Your Opinion Counts' section. When this facility is available it should enable the force to scrutinise the impact of its services on community confidence.

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.¹¹

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.¹² Our 2015 legitimacy inspection¹³ 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.¹⁴ Also, we assessed how the forces scrutinise use of these powers.

Understanding of national guidance

All officers who have contact with the public have received training on the use of stop and search powers and unconscious bias. The force introduced the national training course for stop and search (based on the College of Policing's authorised professional practice (APP)) which includes an online training package that all frontline officers had viewed. Officers we spoke to demonstrated a good level of understanding about how to use stop and search fairly. During our inspection, officers demonstrated a very clear understanding of the most recent APP.

¹¹ *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

¹² *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/

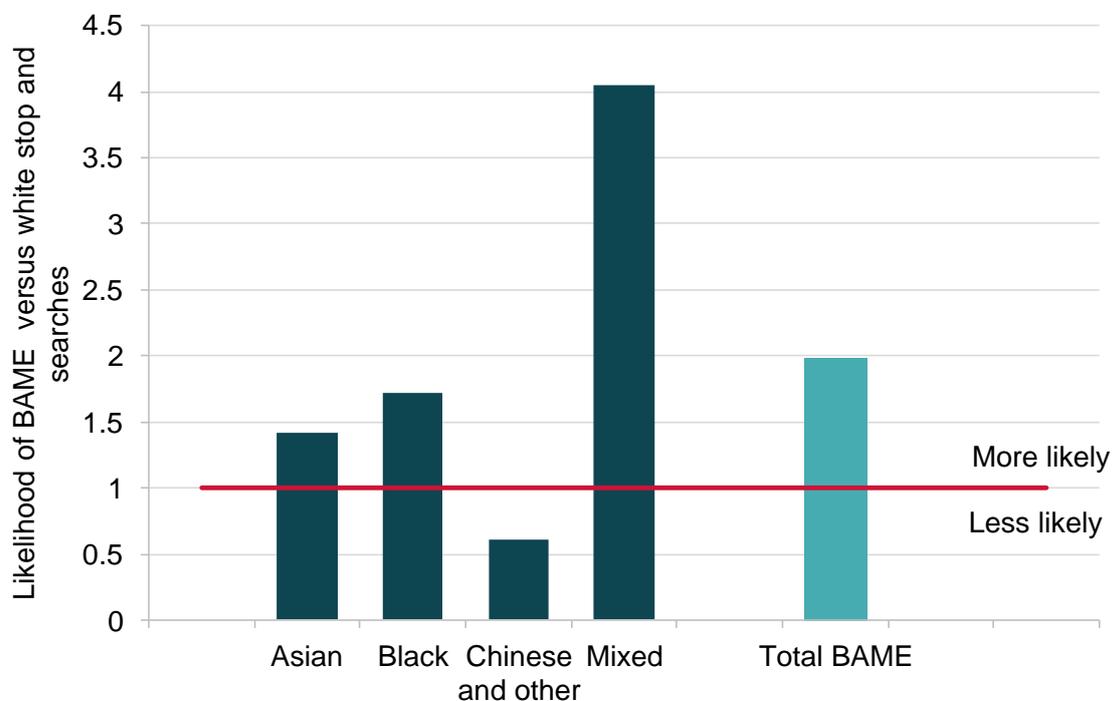
¹³ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

¹⁴ See annex A for more information about the methodology for our review of stop and search records.

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 Gwent Police, black, Asian and minority ethnic (BAME) people were 2.0 times more likely to be stopped and searched as white people. People with mixed ethnicity were 4.1 times more likely to be stopped and searched than white people - the greatest difference in any ethnic group when looking at the likelihood of stop and search compared to white people.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)¹⁵ compared with white people, in the local population of Gwent Police in the 12 months to 31 March 2016



Source: Home Office 2016

The force's two basic command units (BCUs) hold quarterly meetings to monitor and scrutinise the use of stop and search at a local level. Trends or anomalies are highlighted, as is the use of powers relating to crimes and crime hotspots, the reasonableness of recorded grounds for stop and search, officer behaviour and the use of stop and search as a performance measure. Stop and search is intended to be used to reduce the numbers of crimes committed. Any trends or anomalies

¹⁵ Police and Criminal Evidence Act 1984. Available at: www.legislation.gov.uk/ukpga/1984/60/section/1

identified are referred to the quarterly force-level stop and search board, chaired by the assistant chief constable, which monitors force-level data including public complaints received regarding stop and search encounters.

We were disappointed to find that the force does not scrutinise the full range of available data for evidence of any potential unfairness or good practice nor to provide assurance that the power is consistently being used legitimately across the force. While the board looks at BAME and age-disproportionate use, it does not examine data relating to repeated searches of the same individuals. The board examines data on positive outcomes, but currently the force's analysis of data does not differentiate between arrests arising from finding the item searched for and unrelated arrests. The force does not scrutinise the rate of searches being conducted where the item looked for was found, which is a useful indicator of the grounds for search being well-founded. The absence of comprehensive monitoring of data and information means that the force does not have an accurate picture of the way it uses the powers.

The force provided a recent example of an officer who used stop and search powers more often than other officers; the officer was identified at a recent stop and search board and actions were raised for local managers to conduct a review of the officer's use of the powers. This review resulted in remedial action being taken in the form of additional guidance.

The force accepts that supervision of the process on a case-by-case basis needs to be improved and that dip-sampling of the reasonableness of recorded grounds should occur on a more regular and frequent basis. Currently dip-sampling is conducted by the office of the police and crime commissioner (OPCC) in conjunction with the IAG, and involves the force tactical stop and search lead. This dip-sampling is scheduled to occur every six months but at the time of our inspection, the last dip-sample was in August 2016 and the next is planned for the end of April 2017. More frequent and regular dip-sampling of recorded reasonable grounds would allow the force to identify any individual or organisational trends or patterns so it could provide more immediate feedback to officers or introduce organisational improvements when required.

Research has shown that the use of body-worn video cameras can improve the behaviour of both the officer and the person subject of the filming.¹⁶ Officers have access to body-worn video cameras and force policy requires them to be activated at all incidents where members of the public are subject of the stop and search process. However, this is not being applied consistently across the force and greater scrutiny of body-worn video for stop and search encounters would identify when this

¹⁶ *Guidance for the Police use of body-worn video devices*, Home Office, July 2007; *Picture this: body worn video devices ("head cams") as tools for ensuring fourth amendment compliance by police*, Harris, D., April 2010.

is not happening or provide additional insight or assessment as to whether officers are consistently using the power fairly and respectfully.

External scrutiny of stop and search powers to improve treatment

Gwent Police does encourage some limited external scrutiny of stop and search in the form of their ride-along scheme and through dip-sampling of stop and search forms by members of its IAG. However, there is no bespoke IAG in place to provide independent external scrutiny of the force's stop and search activity. The force could also go further in the extent to which, and the regularity with which, it involves local communities – including young people – in the monitoring and scrutiny of use of stop and search across the force to make improvements in the way stop and search is used across the force. The force's ride-along scheme has been running since August 2015 and involvement is particularly encouraged from members of communities with potential cohesion issues, or those that may have less trust and confidence in the police. There have been more than 490 applications from people who want to take part in the scheme, with 75 percent of applicants under the age of 29 or from black, Asian and minority ethnic (BAME) groups. Feedback is encouraged by the force from participants who provide written feedback to the force. This feedback is then reported to the stop and search board to enhance its understanding of stop and search activity and to local policing area senior officers, when issues require immediate attention.

The force ensures that IAG members remain completely independent, that they are properly briefed on their area of speciality and that they are capable of performing their role effectively. Where members have a specific scrutiny role then training is provided. For example, the members who are involved in stop and search scrutiny have had an input on that area of the law to allow them to scrutinise activity effectively. The IAG attends and plays an active role in the force's stop and search board meetings and is confident to challenge the force when it considers it appropriate to do so.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984 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.¹⁷ In our 2013 inspection of the 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

¹⁷ Police and Criminal Evidence Act 1984. Available from: www.legislation.gov.uk/ukpga/1984/60/contents

¹⁸ *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectors.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/

sufficient reasonable grounds to justify the lawful use of the power. For Gwent Police, the 2013 inspection showed that 41 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 100 records found that 15 did not have reasonable grounds recorded.

The OPCC’s own dip-sample of stop and search in August 2016 found that 70 percent of stop and search records had reasonable grounds recorded. The other 30 percent were not recorded correctly or had insufficient information detailed in the grounds. The force provided specific training to supervisors on reviewing stop and search records in response to these findings.

During our 2017 inspection, we reviewed 200 stop and search records; disappointingly, 23 records did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records completed by the force, and despite the training provided by the force since 2015, our findings indicate 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 unacceptable that officers and supervisors still either do not know what constitutes reasonable grounds or how to record those grounds 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 only 5 of the 200 records we reviewed, the item searched for was found. This finding is potentially serious, as this is an important measure, given that 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	41 of 200	15 of 100	23 of 200
Item searched for found	-	-	5 of 200

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

Both the HMICFRS review of stop and search records and the dip-sampling conducted by members of the IAG showed an unacceptably high number of searches that had been carried out without reasonable grounds recorded to justify the search. The force has taken action in response by providing more training and guidance to address this.

Summary of findings



Requires improvement

Leaders in the force demonstrate that they understand the importance of treating the people they serve with fairness and respect; this is reflected in the unconscious bias training and guidance provided to frontline officers and force leaders, and the fact that this is being introduced to the whole workforce. Officers and PCSOs whom we spoke to showed a good understanding of the fair and respectful use of coercive powers.

Force-level scrutiny of stop and search is taking place but this is currently limited in its scope. The force would benefit by extending its scrutiny regime to recognise any potential unfairness or good practice and to provide assurance that the power is consistently being used legitimately across the force. The force is not able to comply fully with the national recording standard on the use of force but does encourage and make use of some external scrutiny of areas that effect fair and respectful treatment of people by the workforce. The force does not currently review its body-worn video camera records in relation to its scrutiny of stop and search.

Areas for improvement

- The force should regularly and frequently review body-worn video footage as part of its scrutiny process for improving the way it uses stop and search.
- The force should put in place independent external scrutiny of its use of stop and search and ensure reviews are conducted more frequently.
- The force needs to develop and put in place more comprehensive analysis of its stop and search data.
- The force needs to comply fully with the national recording standard on the use of force.
- The force should ensure that officers and supervisors likely to use stop and search powers understand what constitutes reasonable grounds.

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 are an integral part of Gwent's decision-making processes and are valued by leaders across the force. The force has a robust system in place for the consideration of ethical matters through its ethics committee. The committee looks at all internal and external ethical topics. It is made up of external independent members. The system is accessible to all ranks and grades, and is used by the force to address areas in need of change in an ethical way. The force is in the process of increasing the membership of the ethics committee to balance the composition of its members with some internal members of staff to provide broader experiences and perspectives when discussing and advising on ethical concerns. The force has several other methods of external scrutiny, including regular involvement of independent advisory groups and community groups. These involve senior officers who attend and facilitate or listen to the discussions. Ethical dilemmas are discussed regularly across the force in team discussions; from frontline officers and staff to senior leaders. The consideration of ethics runs through Gwent's decision-making processes and is embraced and valued by leaders across the force.

The chief constable uses his blog to reinforce his expectations of staff, with one example relating to a case of gross misconduct where he expressed his disappointment at the behaviour of an individual and the fact that such behaviour had been allowed to progress to the stage it had without any challenge. He called upon supervisors to contest such behaviour at an early stage and encouraged staff to report behaviour to the hotline or directly to him.

Chief officer expenses are published on the force's website however they are not up to date (some have not been updated since autumn 2016). Similarly, details of gifts and hospitality are published on the website but are also not current or easy to find.

Ethical decision making

The force has accessible policies and procedures that comply with its equality duty and reflect the Code of Ethics. These are scrutinised by the ethics committee which feeds back its findings and recommendations to the chief officer team. We found extensive evidence of this process in action, including a review of the draft force deployment policy, draft positive action policy, body-worn video procedure and voluntary exit scheme. The committee puts its recommendations in writing to the chief officer team which then considers them and decides whether to accept and adopt them.

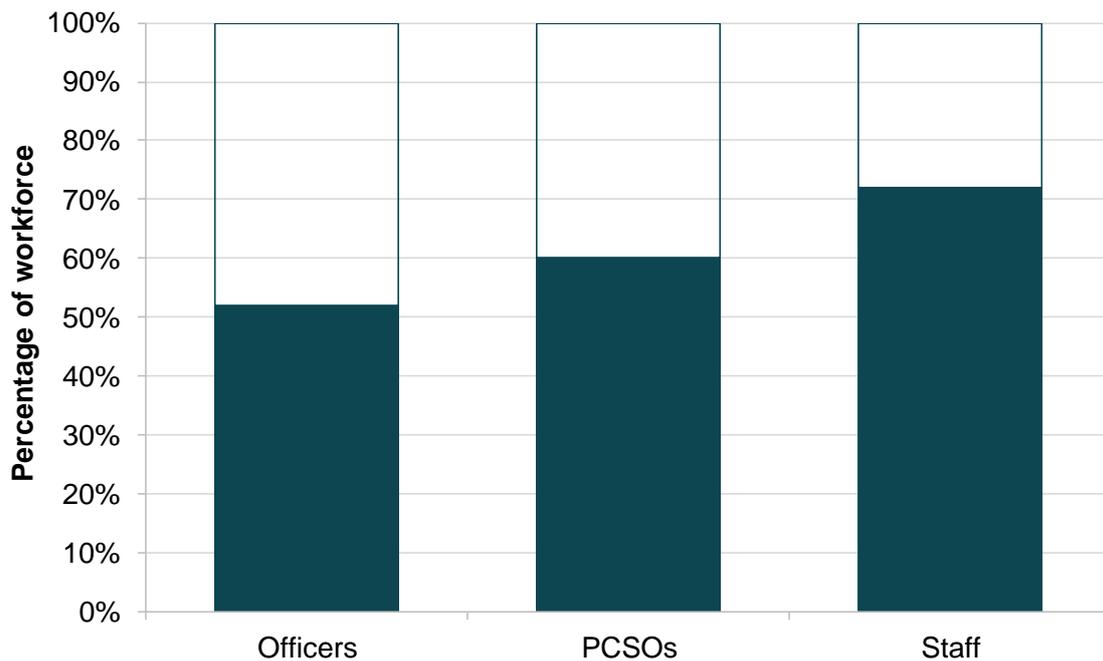
The force highlighted an overarching policy which allows staff to step outside of any of the force's policies if it would be the right thing to do. HMICFRS saw good examples of this in last year's inspection.

The force provides comprehensive training on ethical decision making and this is further enhanced by refreshed content, which is included on regular training days, during monthly discussions by line managers with their staff about ethical dilemmas and through continuous advice and guidance from line managers to individuals as required. The force also makes regular use of discussions about ethical dilemmas which are circulated to all departments across the force via the force intranet to enhance knowledge and understanding of the Code of Ethics at all levels across the force. Officers and staff we spoke to were able to provide us with real life examples of how they consider ethics as part of their decision making in their day to day work.

Vetting

It is important that re-vetting takes place on a regular basis and before an individual is promoted or posted to a high-risk unit. During this year’s inspection we asked Gwent Police to provide us with data on the percentage of their workforce that had up-to-date security clearance. The data we received showed that on 31 January 2017, 52.0 percent of officers, 60.0 percent of PCSOs and 72.0 percent of staff had up to date security clearances, as illustrated in Figure 2.

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



Source: HMICFRS Legitimacy data collection

During our 2016 legitimacy inspection we considered the extent to which the force was ensuring it was developing and maintaining an ethical culture through effective vetting to ensure that unsuitable people did not join the police service or did not have access to police information. We found that Gwent was not complying with all

aspects of the national vetting standards because it had not vetted all of the people in designated roles who required a higher level of vetting. There was also a backlog of staff who required re-vetting.

During this year's inspection we assessed the force's plan for addressing these matters and found that the force's vetting priorities are focused on new recruits and contractors. We found little reference to how it will address the remaining backlog which was 825 workers without up-to-date security clearance as at 31 January 2017. The force has brought in two additional members of staff to deal with the backlog, but expended this extra capacity on prioritising the increase in contractors and new recruits, leaving the original backlog untouched. The force is at risk of security breaches, reputational damage and corrupt behaviour because it is allowing access to police information and premises by people who are not currently vetted to the national vetting standard. The force would benefit from an evaluation of the workload in the vetting unit, and for chief officers to document formally the policy decision and acceptance of risk in the prioritisation of workload towards new entrants and contractors, rather than dealing with the backlog of existing staff.

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.

Ease of making a complaint

Gwent Police's website provides straightforward and comprehensive information about how to make a complaint in English and Welsh and several other languages. It also provides information on the types of support available to people who may require additional assistance with making a complaint.

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

We visited police stations across the force and found IPCC leaflets that described the complaints procedure. However, IPCC statutory guidance requires forces to go further by providing force-specific written information and posters at public places such as enquiry offices, custody suites, support agencies, libraries and the public areas of partner organisations. We were unable to find any posters or locally-produced material about how to make a complaint at any of our visits to local police stations in Gwent and the force was unable to point to work that it has done to make information about complaints available in other public places, or through other organisations.

We were unable to find any communications targeted at communities with less confidence in the police. The exception to this was those people who have been stopped and searched and who are then provided with the standard detachable portion of the search record that provides information on how to make a complaint.

The force generally provides support to those people who require additional assistance, including making adjustments to enable them to explain their allegations and to understand what is happening. We carried out a file review of 25 public complaints and found three cases where complainants needed additional support. The files recorded that additional support had been provided in two of the three cases where it was required. We carried out a file review of 11 misconduct allegations and found one case where misconduct witnesses needed additional support. The files recorded that appropriate support had been provided in this case.

Keeping complainants updated

The professional standards department (PSD), and other staff handling or investigating complaints, engage well with complainants and keep them appropriately updated on progress in line with legislation and IPCC statutory guidance. The PSD structure is such that all complaints that relate to performance (as opposed to misconduct) are passed to a dedicated team of two sergeants, one for each of the two local policing areas. The relatively small geographical area of the force allows these officers to visit both complainants and those officers or staff who are subject to complaints to provide a more personal service. If these sergeants reach capacity, they pass a limited number of complaints to local inspectors, but keep a tight overview of their work to ensure quality. All complaints and misconduct investigations which do not relate to performance are investigated by a central team of qualified detectives who produce high quality misconduct and complaint investigations with a strong public focus.

Our review of 25 complaint files found that all contained evidence of the complainant having been provided with a copy of the complaint record, an explanation of the ways in which the complaint could be dealt with and contact details for the person who was dealing with their complaint. In the case of investigations, complainants were provided with the terms of reference and an explanation of the final outcome in a way that could be easily understood. In 24 out of 25 of the complaint files we found

records of regular updates to complainants (at least every 28 days) which were sufficiently informative about the stage reached in the investigation, what had been done, what remained to be done, a summary of any significant evidence obtained and the likely timescale for completing the investigation and any revisions to this. However, we found that investigators do not record contact plans to show what has been agreed with the complainant.

Of the 11 misconduct cases we reviewed, nine recorded regular updates to witnesses and those subject of allegations and were sufficiently informative. However, in contrast to this, we heard from members of the workforce, who had been the subject of misconduct investigations, that the letters they had received were standard letters and did not provide them with adequate information.

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

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

Identifying and responding to potential discrimination

Gwent Police ensures that its workforce identify and respond to potential discrimination effectively, providing a good service to all of the people it serves, including those with protected characteristics. The force's diversity and equality board makes regular reference to discrimination and reinforces actions relating to activity across all types of diversity to ensure fair decision making. Each diversity strand has a champion with responsibility for driving activity, monitoring performance in respect of the identification of discrimination, ensuring timeliness and over-seeing the quality of the initial response to their particular strand of discrimination, and thereafter for providing updates to the board. Members of the force were able to demonstrate a good understanding of what discrimination is and the effect it has, and staff were able to relate unconscious bias and discrimination to their own policing experiences. They were also able to demonstrate how their attitude to

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

certain members of the public has changed as a result of their increased understanding.

We looked at ten complaints that had been identified by the force as containing an allegation of discrimination. We also looked at 15 other complaints from categories that we considered might contain unidentified allegations of discrimination. We found that one of these other complaint cases contained allegations of discrimination which the force had failed to identify. During our case file review, we looked at one internal misconduct case that had been identified by the force as containing an allegation of discrimination. We also looked at 10 internal misconduct cases that we considered might contain unidentified allegations of discrimination. We did not find any additional cases that the force had failed to identify.

We found that five complaint cases met the IPCC referral criteria, and were pleased to see that all five of these cases had been referred to the IPCC. We also found that six internal misconduct cases met the IPCC referral criteria and that all six had been referred to the IPCC, so we were satisfied that the workforce are identifying discrimination and responding to it appropriately. Our findings showed that the public can have confidence that the force has dealt with each case we examined appropriately, professionally and with integrity.

Investigating allegations of discrimination

Our file review showed that PSD detectives investigate allegations of discrimination well, and can apply their training in unconscious bias, equality and diversity and the IPCC discrimination guidelines to their investigations. The majority of the investigations were well-conducted and provided a good level of service to complainants with appropriate support provided throughout the process. We looked at ten public complaint cases that the force had recorded as containing an allegation of discrimination. We considered whether these allegations had been investigated satisfactorily and in accordance with the IPCC guidelines for handling allegations of discrimination. We found that all of these cases had been investigated satisfactorily. We also considered whether overall the complainant making an allegation of discrimination received a good service from the force. We found that all but one complainant received a good service from the force.

Summary of findings



Good

Gwent Police is good at ensuring that its workforce behave ethically and lawfully. The force has an effective system in place for the consideration of ethical decision making; this is reinforced by a comprehensive training programme. This training is understood and refreshed regularly, and further guidance is available in the workplace. Ethical dilemmas are used regularly across force; these focus on hypothetical scenarios which might undermine the force's reputation and the workforce are tested on how they would respond to them. This initiative is coordinated by the force's ethics board which is chaired by a chief officer; officers and staff spoke of their willingness and confidence to refer matters to the ethics board if they have concerns. Chief officers regularly publish examples of ethical decision-making and occasions when front line workers have acted positively to protect the reputation of the service

Chief officer expenses are posted on the force's website, although some information is not up to date. The force's vetting programme is not yet in a position to ensure that security clearance is in place for the entire workforce; there is a plan to improve this situation which will be carefully monitored by HMICFRS.

The force provides comprehensive information about how to make a complaint in English and Welsh on the force website, however better multi lingual literature should be made available to the public in police buildings. Once someone has made a complaint however, the force is good at keeping complainants updated about the progress and outcome of their complaint. The force ensures its workforce identifies and responds to potential discrimination and investigates allegations thoroughly in line with national guidance.

Areas for improvement

- The force should ensure it complies with all aspects of the current national guidelines for vetting and has a renewed vetting action plan.
- The force should ensure its gifts and hospitality register is up to date.
- The force should ensure that it has force specific literature in police stations and other public places on how to make a complaint in line with IPCC statutory guidance. In particular this should focus on communities with less confidence in the police.

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

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

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

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

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

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

Available at:

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

²⁸ *Ibid.*

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

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

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

Leaders seeking feedback and challenge from the workforce

Gwent Police has a comprehensive set of systems and processes that ensure leaders seek feedback and challenge from the workforce. The force reviews all of its change management functions, and these allow the workforce the opportunity to challenge and feedback about the effect of change. This feedback has resulted in significant changes to previously introduced projects. The chief runs ‘Ask the Chief’ events on the intranet, and encourages, reads and responds personally to every contact and issue raised by the workforce through this route. His responses are accessible online for the workforce to see. These avenues are well used and valued by frontline officers and staff. Chief officers also undertake ‘Time to Listen’ meetings with departments across the force where the workforce can raise concerns. These discussions are followed by a debrief and actions taken in response to concerns are shared with the force through the ‘Chief’s Blog’. An example of where the force has responded to feedback came from a concern highlighted in the staff survey which identified that the force did not consult with staff at a sufficiently early stage of any change programme. As a result of this being raised, the force now consults with the workforce and staff associations as part of the planning for proposed change. This has led to a far more engaged workforce that feel valued by the organisation.

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

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

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

The force carries out an annual staff survey to identify, amongst other things, issues affecting the workforce. The last survey conducted in summer 2016 had over 1,000 respondents which was a 53 percent response rate. There is a 'You Said We Did' page on the force intranet so the workforce can see what action is being taken to address issues raised, including those highlighted as part of the staff surveys.

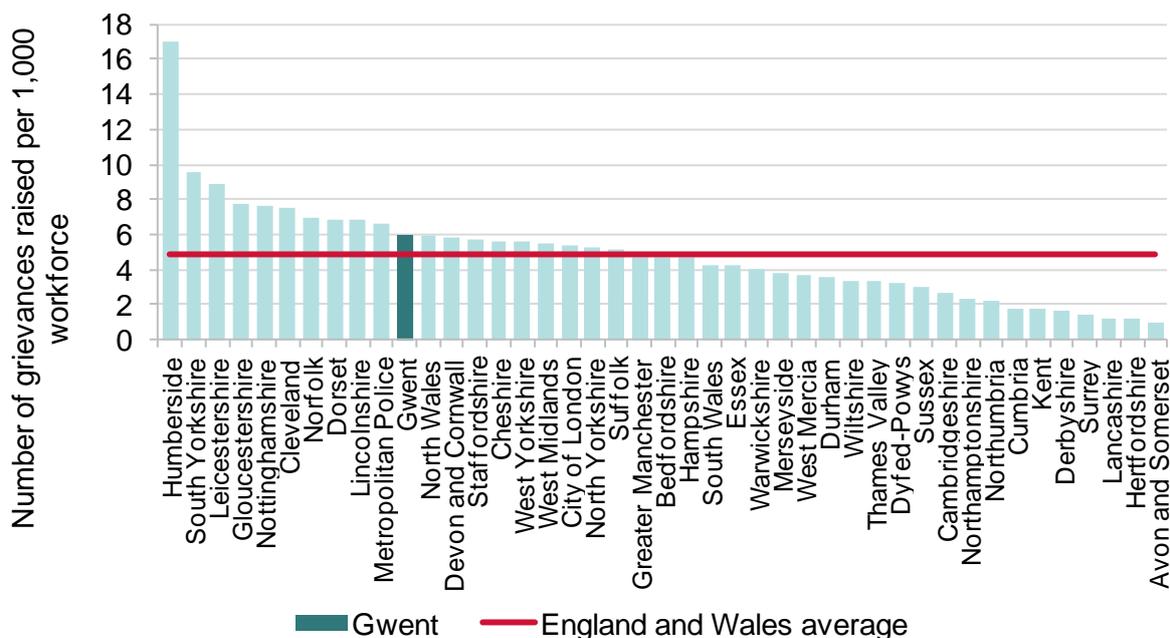
Identifying and resolving workforce concerns

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

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 Gwent Police had 6.0 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

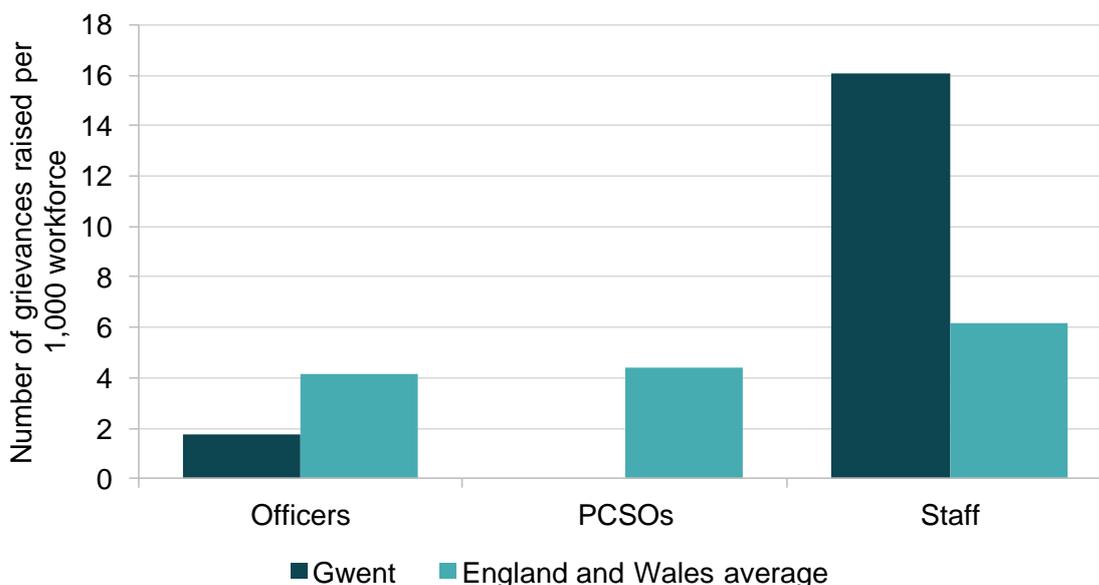
Figure 4 shows that the number of grievances raised by officers in Gwent Police was 1.8 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period PCSOs raised no grievances, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 16.1 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 Gwent Police in the ten months from 1 April 2016 to 31 January 2017



Source: HMICFRS Legitimacy data collection

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



Source: HMICFRS Legitimacy data collection

The force is good at identifying and resolving workforce concerns. The force uses its staff survey and its various workforce engagement mechanisms to understand workforce perceptions and to recognise specific concerns regarding fair decision-making and respectful treatment. This is achieved by monitoring and addressing workforce concerns at an early stage, through reviewing staff grievances and by conducting exit interviews to find any underlying causes behind a person’s decision to leave. The force also has networks for officers and staff with protected characteristics through which concerns can be raised directly with chief officers. For example, the workforce raised concerns about fairness in the selection process for temporary promotions. As a result, the force introduced a more formal application and selection process for temporary promotions. Another example involved concerns that the force was slow to release individuals who had secured positions in regional units. The force responded by making it policy to release people from their current role at the earliest opportunity.

It is very important that members of the workforce have the confidence to make grievances or to raise other workplace concerns, in the knowledge that the force will listen, respond appropriately and support those people involved throughout the process. We reviewed ten grievance files, looking at what arrangements the force had put in place to support all of the people involved in the grievance, and any witnesses, and overall whether the force had properly identified, investigated and resolved the grievance in line with the Acas Code of Practice and Guidance.

We found that in all grievance cases there was a record of appropriate arrangements having been put in place to support the employee and witnesses throughout the process. We also found that, in all but two grievance cases, the force had properly

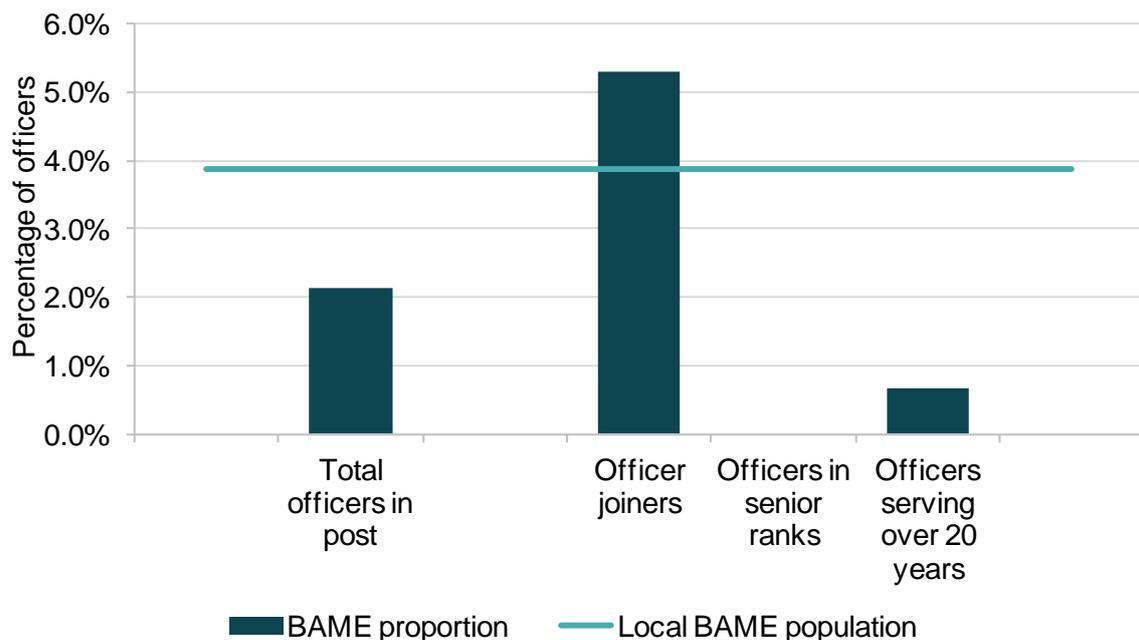
identified, investigated and resolved the grievance in line with the Acas Code of Practice and guidance. The reasons for failure were speed of handling and outcome.

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 Gwent Police, the 2011 census indicates that BAME people made up 3.9 percent of the local population. In 2016/17, in Gwent Police 2.1 percent of officers were BAME (see figure 5). In relation to officers, 5.3 percent of those joining the force, none of those in senior ranks and 0.7 percent of those who had served over 20 years were BAME.

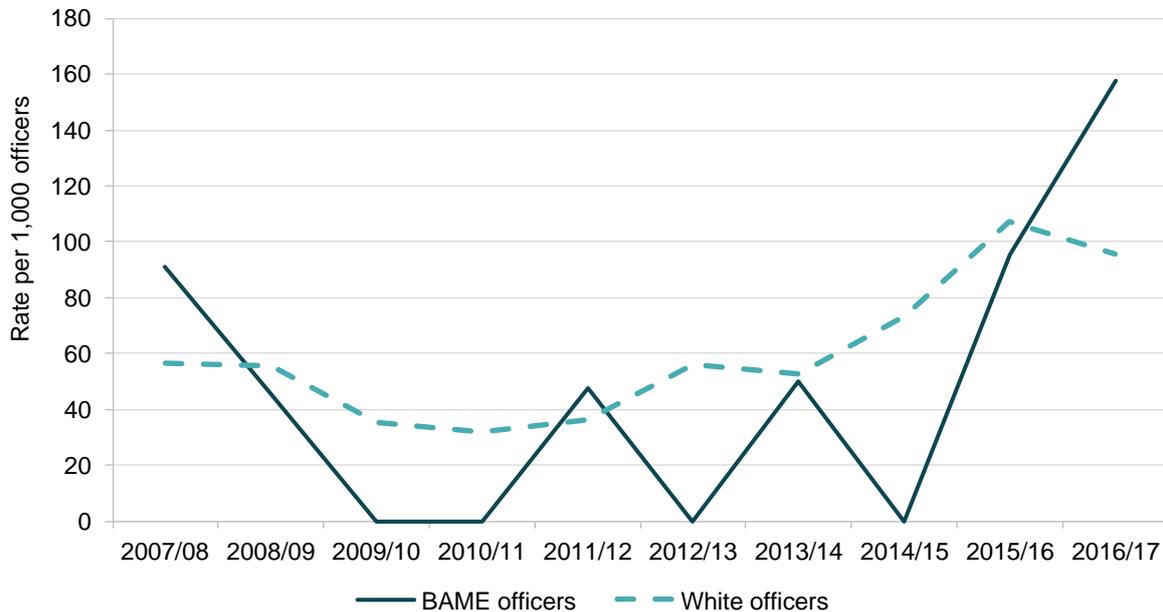
Figure 5: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Gwent Police in 2016/17, compared with the percentage of BAME people in the local population



Source: Home Office Annual Data Requirement

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

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

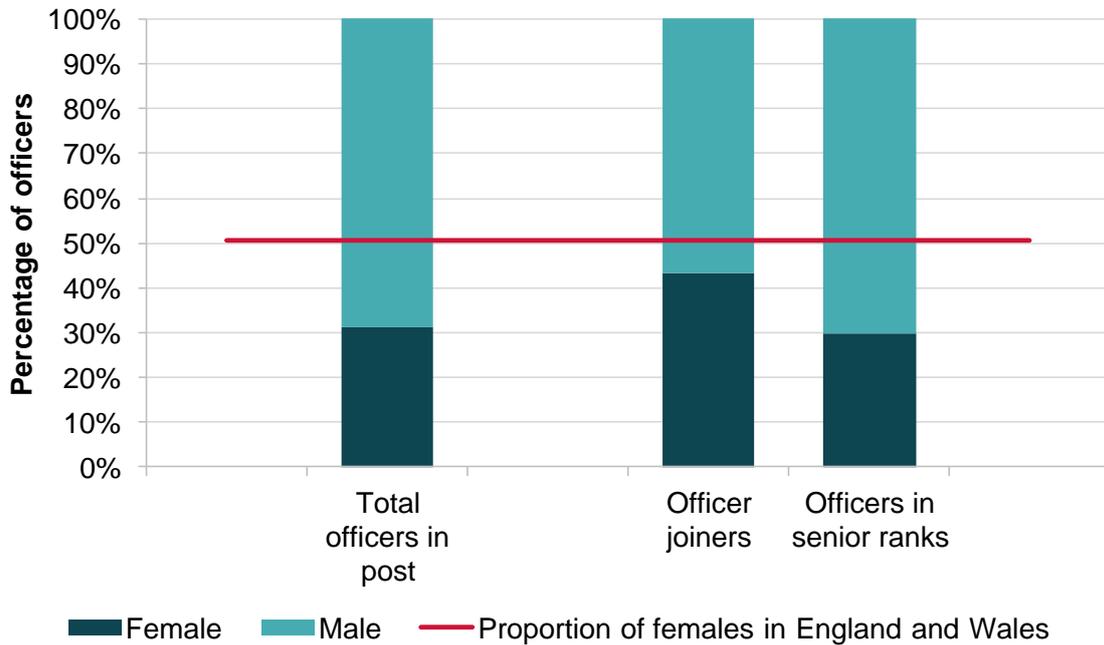


Source: Home Office Annual Data Requirement

In 2016/17 in Gwent Police for the equivalent of every 1,000 BAME officers, 158 left the force (see figure 6), while for every 1,000 white officers 96 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

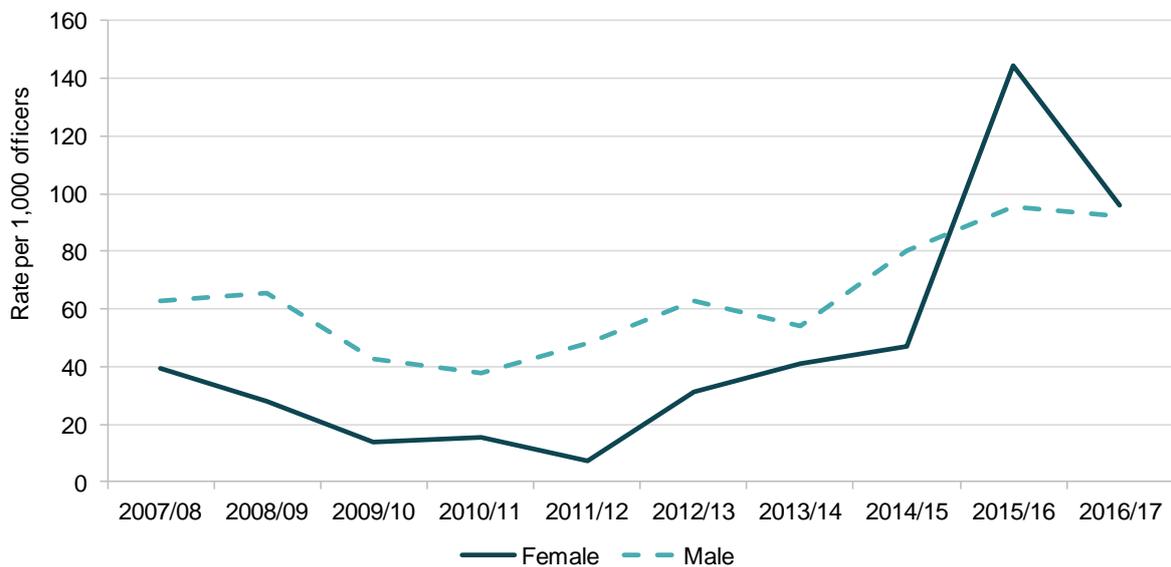
The proportion of female officers is lower than the proportion of females in the general population (51 percent) at 31 percent. In the 12 months to 31 March 2017 in Gwent Police, 43 percent of those joining the force and 30 percent of those in senior ranks were female (see figure 7).

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



Source: Home Office Annual Data Requirement

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



Source: Home Office Annual Data Requirement

In 2016/17 in Gwent Police 96 female officers per 1,000 officers left the force, compared with 92 male officers per 1,000 officers.

The force understands the importance of addressing potential disproportionality in the recruitment, retention and progression of officers and staff. In February 2017 the force organised a presentation for senior leaders entitled 'Recruiting a Diverse Police Force' to increase the awareness of leaders in the force of the benefits of having a more diverse workforce.

The force has also developed a 'positive action report' to promote recruitment from BAME communities and as a result a recent recruitment campaign trebled the amount of successful BAME candidates to ten percent. The force's recruitment and retention of BAME staff are being independently evaluated by a leading chartered psychologist who provides unconscious bias training and awareness to organisations across private and public sectors. The force monitors misconduct cases and there have been no concerns in relation to disproportionality for BAME officers and staff.

The force carried out an evaluation of a recent trainee investigators process and identified disproportionality; a large proportion of female officers with children had withdrawn because they believed that arranging child care around the shift pattern of an investigator would be difficult and so would affect unduly their work-life balance. The force responded to this by offering alternative shifts to ensure a better work life balance whilst still offering the service to the public. The force has also completed positive action in relation to the Welsh language to encourage more Welsh-speaking candidates to apply to be police officers. The force monitors misconduct cases and there have been no concerns in relation to disproportionality for BAME officers and staff.

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

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

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

Understanding and promoting wellbeing

Leaders in Gwent Police are good at demonstrating that they understand and promote the benefits of workforce wellbeing, including mental health and emotional wellbeing. The force continues to promote and improve wellbeing across the organisation through its health and wellbeing strategy. The force provides a variety of channels for finding wellbeing information and support, it is investing in research and development, and the focus of force leaders on supporting people within the workplace has led to reductions in short and medium-term sickness and absence over the last year. Officers and staff that we spoke to felt that the force increasingly valued their wellbeing; they recognised that the force was improving the extent to which it was supporting their wellbeing.

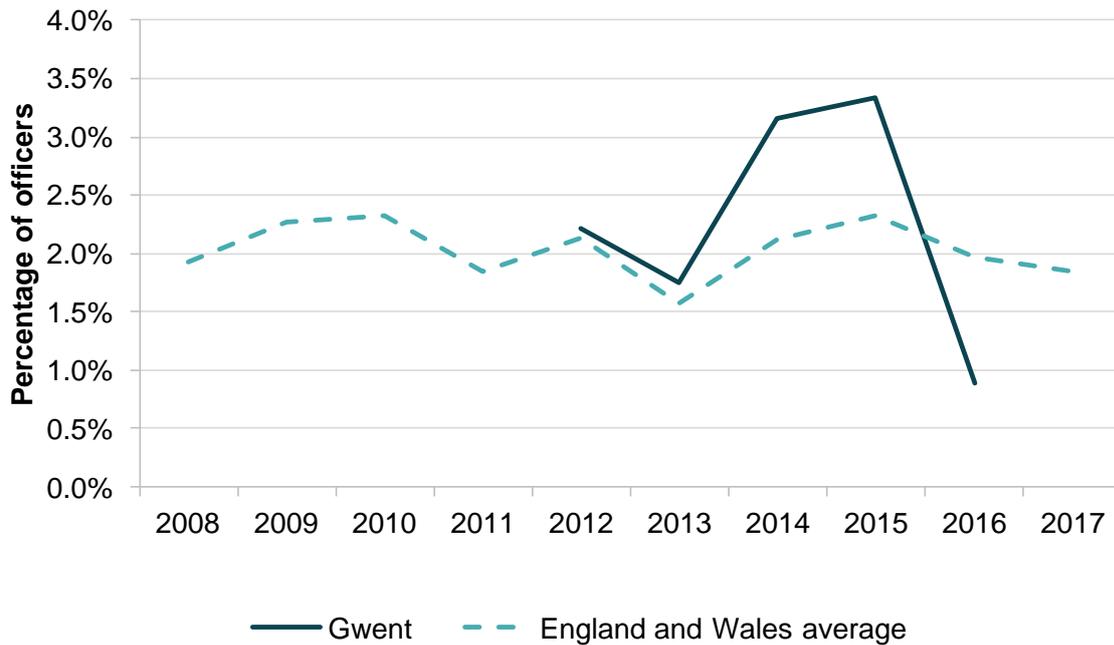
Identifying and understanding workforce wellbeing needs

Gwent Police has a good understanding of the risks and threats to the wellbeing of its workforce, and their underlying causes.

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. Gwent Police were unable to provide data for the 31 March 2017 at the time of writing. The England and Wales average was 1.8 percent.

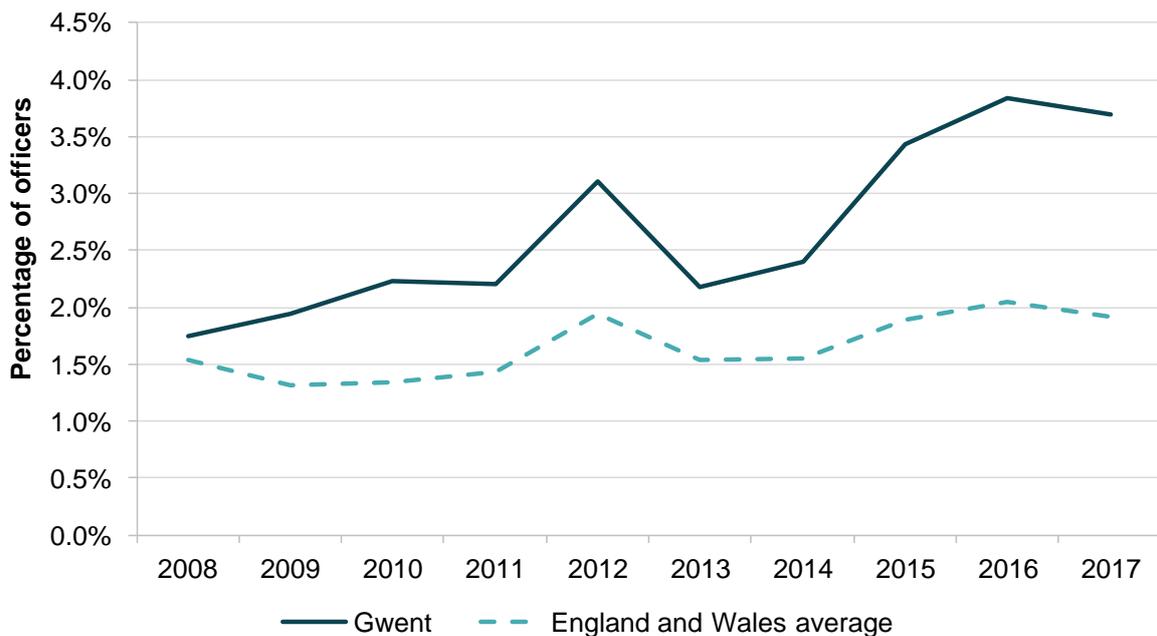
Figure 9: Percentage of officers on short or medium-term sick leave, in Gwent Police compared with the England and Wales average, on the 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in Gwent Police on long-term sick leave was 3.7 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 0.1 percentage points from the previous year, which is in line with changes in the last ten year period.

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



Source: Home Office Annual Data Requirement

The force regularly monitors and scrutinises management information, including absence and sickness figures, and has introduced a far more structured approach to the way it manages and supports officers and staff who are sick or absent. The force's focus on these areas has led to reductions in short and medium-term sickness and absence over the last year.

The force also seeks the views of the workforce on health and wellbeing matters using the staff survey. It undertakes psychological screening of those staff members in high-risk roles on an annual rolling basis. Staff association members and representatives in the human resources department review assaults on officers and staff to recognise trends and initiate any required action through line managers; they also offer support to individuals.

Taking preventative and early action to improve workforce wellbeing

Gwent Police is good at taking early action to improve the wellbeing of its workforce. In particular, data seen by HMICFRS during attendance at an accountability forum suggest that the force's policy of keeping staff members in the workplace and providing appropriate support and access to health and wellbeing services has, between February 2016 and January 2017, almost halved the numbers of officers and staff who are absent for short and medium-term periods.

The force provides a number of avenues through which officers and staff can seek early information and support to improve their wellbeing, from wellbeing ambassadors across the organisation, to the 'Wellbeing Zone' on the intranet and access to 24/7 support and counselling services through its employee assistance programme. The force's occupational health unit also takes referrals for physical and psychological wellbeing matters, and has a dedicated counsellor to support workforce mental health.

The force continues to promote openness about mental health concerns and has introduced a Mental Health in the Workplace Procedure to help supervisors to recognise and support officers and staff suffering from mental health related issues. The force also provided a training day to help officers and staff to recognise potential mental health conditions in themselves and their colleagues and to signpost them to support. The force's mental health support group meets quarterly. It offers a supportive environment for officers and staff to share their experience of living with a psychological illness. The force also ran a mental health training day. All staff in supervisory roles have had mental health training with Mind, and the Blue Light programme to identify the warning signs and provide appropriate support.

Gwent Police also has a variety of preventative measures to improve the health and wellbeing of its workforce, underpinned by its health and wellbeing strategy. Last year we reported that the force had invested in pedometers which generated a healthy competitive environment for staff to take part in exercise throughout their

working day. The force's trauma support and prevention scheme provides officers with the tools both to prevent and deal with concerns caused by traumatic and challenging incidents.

The force has invested £150,000 in a trauma programme to prepare officers to deal with traumatic incidents. This is a three-year programme, run in conjunction with Bristol University, which is evaluating the process. In response to feedback from the staff survey, the force is also introducing trauma risk management (TRiM) to help officers and staff deal with incident-induced trauma.

As well as a range of health and wellbeing initiatives, such as the global corporate challenge to promote employee health and wellbeing, the force has recently introduced an online and interactive website and mobile app as a personalised health and personal fitness portal including advice on exercise, weight, diet and general health concerns that can be customised to the user's personal needs.

Being the subject of a public complaint or an internal misconduct allegation, or a witness to it, can be very stressful for members of the workforce and can affect their wellbeing. We reviewed 11 internal misconduct cases to see whether officers and staff subject to the allegations received satisfactory communication and support from the force under these circumstances, from initial allegation through to final assessment. We found that a satisfactory service was provided in all cases.

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

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

³⁴ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf.

³⁵ College of Policing guidance on the police performance development review (PDR) process is available from www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx. See also the College of Policing's competency and values framework. Available from:

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

During our 2016 inspection we found that Gwent Police needed to improve the way it managed individual performance. This year we found that the force is beginning to improve how it manages and develops the individual performance of its officers and staff, but more work needs to be done. The force's personal development review (PDR) process is managed through its 'force accountability forum', which monitors compliance rates and the quality of PDRs. Last year, when we inspected the force, this process was in its very early stages. We were disappointed to find that this year the process is still not fully established and does not yet have credibility with much of the workforce. The force recognises that the new process is unpopular with staff and is viewed by some as only having limited value, although there is some evidence from the staff survey that perceptions of the effectiveness of unsatisfactory performance procedures are improving.

We found a mix of views from officers; those seeking promotion or lateral development saw the benefits of the system, while others could see little benefit. Officers and staff told us that they all had a PDR with a combination of corporate and personal objectives, but some indicated that the process had been rushed to meet the annual deadline. Supervisors are now required to conduct individual meetings with their team members on a quarterly basis as part of establishing a more consistent approach to managing performance, but the force still has work to do to improve perceptions of the fairness and value of the process.

Continued professional development (CPD) is encouraged and forms part of the performance management process and we found examples where individual development opportunities had been identified and provided to members of the workforce. An example of where it has been used effectively is in the newly formed cybercrime team. This unit consists of several teams that work together to investigate cyber crime, including intelligence triage, SPOC, digital investigations, financial investigations and the police on line investigation team (Polit). Through PDR, team members have been encouraged to become up skilled to carry out their roles more effectively.

Identifying potential senior leaders

The force has an established process for identifying high-potential candidates based on line manager support, application forms and interviews and is in the early stages of identifying high-potential members of the workforce. The force has recently created a talent management role; however it does not appear to be encouraging

supervisors to recognise talented individuals. There are opportunities for development, but they are not seen as having sufficiently high profile, although they are circulated across the force every few months. The force's investment in this area will support it in identifying the most talented individuals, but it is still in need of further development. There is no independent oversight or professional design or administration, and no definition of 'talent' for the purposes of this selection, although the force has recently invested in a talent manager post in the learning and development department, and line managers have had training in unconscious bias. Officers and staff that we spoke to felt that gaining particular 'backers' was a pre-requisite of promotion.

We consider that the force needs to do more to overcome this perception, by putting in place suitable checks and balances, including a method of challenge for participants. This is particularly true for police staff roles, as the police staff we spoke to felt that the force's talent management process was targeted towards police officers.

Selecting leaders

The force has worked hard to develop a fair approach for the selection of leadership roles at all levels but does not yet have the full trust and confidence of those taking part, particularly police staff. Following a review the force recently changed its promotion processes so that they are more values-based than competency-based, and candidates are now selected who demonstrate that their approach is in line with the force values and ethics. The most recent chief inspector promotion process followed the College of Policing competency and values framework for policing. Briefings were given to candidates in advance of the process to help them understand the new framework and officers who were not successful were offered feedback sessions.

Senior officers who attend Team Gwent events received bespoke training from external experts in unconscious bias in order to help officers and staff discuss, understand and raise personal awareness of their potential predispositions so they can overcome them when selecting for leadership roles. The force removes names and other demographic data from its application forms. The force has undertaken a skills audit, but it could do more to identify the aspirations of its staff to support their development, in a way that mirrors the processes in place for police officers. The force has taken positive steps, but there is clearly more work to be done, for example the force has yet to involve professional input into exercise design, and some of the workforce still believe that 'backers' are more important than any real assessment of competence. This is very much a work in progress, and if the current progress is sustained there should be significant development with regards to organisational justice.

Summary of findings



Good

The force has a comprehensive set of systems and processes that ensure leaders seek feedback from the workforce, including post implementation reviews, 'Ask the Chief' events, the staff survey, 'Time to Listen' sessions with chief officers and regular communication with staff networks. In this way, the force identifies workforce concerns and is good at acting upon feedback from the staff survey. The workforce have confidence in these processes, and the force's grievance procedure, which are effective at resolving workforce concerns.

The force continues to promote and improve physical and psychological wellbeing across the organisation via its health and wellbeing strategy. The force has a good understanding of the risks and threats to the wellbeing of its workforce and their underlying causes, and there is a range of information and support available to ensure that preventative and early action is taken in response to wellbeing concerns. The force's policy of supporting staff members in the workplace has led to reductions in sickness and other absences.

The force is beginning to improve how it manages and develops the individual performance of its officers and staff, but the process is not yet fully effective as it does not yet have credibility among much of the workforce. The force has an established process for identifying high-potential candidates but there is still a feeling among the workforce that gaining particular 'backers' is a pre-requisite, and that police staff are not as well supported in this area. The force recently reviewed its promotion processes and has moved away from competency-based selection towards values-based selection.

Areas for improvement

- The force should review how high potential members of the workforce are selected for leadership development.
- The force should take steps to ensure selection and promotion processes are transparent to improve the perception of fairness of officers and staff.
- The force should continue to develop an effective system for managing individual performance to improve the perception of its value by officers and staff.

Next steps

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

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

Annex A – About the data

Data used in this report

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

Methodology

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

Comparisons with England and Wales averages

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

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

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

Statistical significance

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

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

Population

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

Note on workforce figures

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

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

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

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

Force in numbers

Workforce (FTE) for 2016/17

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

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

Ethnic diversity and gender diversity

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

Grievances

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

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

Stop and search

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

Figures throughout the report

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Stop and search record review methodology

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

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

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

Professional standards case file review methodology

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

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

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

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

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

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

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