

# PEEL: Police legitimacy (including leadership) 2017

An inspection of Norfolk Constabulary



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## Introduction

As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> This principle is described as

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<sup>1</sup> 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.

<sup>2</sup> *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at:  
[http://whatworks.college.police.uk/Research/Documents/Fair\\_cop\\_Full\\_Report.pdf](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>3</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:  
[http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%20FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf)

'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/norfolk/efficiency/](http://www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2017/norfolk/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/norfolk/](http://www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2016/norfolk/).

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/](http://www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/how-we-inspect/)).

## Force in numbers



### Workforce

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

**2,724**

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

officers

**1,515**

staff (including section 38)

**1,060**

PCSOs

**149**



### Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

**1.3%**

officers

**1.7%**

staff

**0.6%**

PCSOs

**1.2%**

Percentage of BAME in local population, 2011 Census

**3.5%**



### Gender diversity

Percentage of females in overall workforce 31 March 2017

**40%**

England and Wales population, 2015 estimate

**51%**

Percentage of females by role 31 March 2017

**28%**

Norfolk Constabulary

officers

**59%**

staff

PCSOs

**41%**



## Grievances

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

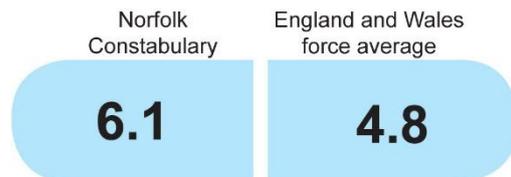


## Stop and search

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

5,359

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 judgment<sup>4</sup>



**Good**

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

## Overall summary

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



**Good**

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



**Good**

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



**Good**

Norfolk Constabulary continues to demonstrate that it treats the people it serves with fairness and respect. We identified a strong culture of ‘doing the right thing’ among the workforce, who receive the training they need to use their powers fairly and respectfully. The force monitors the use of its coercive powers and ensures any learning from this is used to improve workforce training. Effective external scrutiny is provided through public meetings as well as an independent advisory group and independent stop and search scrutiny panel. The force is introducing body-worn video cameras for frontline officers, which will enable further scrutiny.

The force is good at ensuring that its workforce behaves ethically and lawfully and its policies are based on the Code of Ethics. However, the force needs to ensure that it complies fully with current national vetting standards.

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<sup>4</sup> HMICFRS judgments are outstanding, good, requires improvement and inadequate.

Norfolk Constabulary provides comprehensive information about how to make a complaint, both on its web page and in force buildings. The force reviews all public complaints and internal misconduct investigations to ensure it learns from its mistakes. The force's joint professional standards department with Suffolk Constabulary undertakes satisfactory investigations in cases involving alleged discrimination. However, it needs to ensure it identifies all allegations involving discrimination, it updates complainants and those who are the subject of allegations in a timely manner (in line with legal requirements) and that updates contain sufficient information on the progress of the investigation.

Norfolk Constabulary is good at treating its workforce with fairness and respect. The force encourages and listens to feedback from the workforce. It uses a wide variety of methods to gather feedback with the workforce in person and anonymously, and is proactive in responding to concerns. The force continues to improve the range of wellbeing services it provides. It is making progress in increasing the diversity of its workforce so that it better reflects the communities it serves. However, it needs to improve the way individual performance assessment is used and ensure that selection and promotion processes are consistent and fair across the workforce.

#### **Areas for improvement**

- The force should improve the quality and timeliness of updates to complainants, including matters of misconduct, in line with IPCC statutory guidance.
- The force should improve the level of understanding among its workforce so they can identify and respond appropriately to initial reports of discrimination at the earliest opportunity.
- The force needs to ensure that selection and promotion processes are open and fair, and are perceived to be so by the workforce
- The force needs to ensure that the staff performance assessment framework is applied consistently and fairly across the entire organisation and that staff consider it valuable in supporting their development.

## 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.<sup>5</sup>

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,<sup>6</sup> their awareness of effective communication skills<sup>7</sup> in all

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<sup>5</sup> *It’s a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: [http://whatworks.college.police.uk/Research/Documents/Fair\\_cop\\_Full\\_Report.pdf](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>6</sup> 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.

<sup>7</sup> 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).<sup>8</sup>

### **Understanding the importance of treating people with fairness and respect**

Norfolk Constabulary has a good understanding of the importance of treating people with fairness and respect. It understands how treating its own workforce well leads then to the workforce treating the public with fairness and respect. The force summarises its approach as: 'Fair on the inside leads to fairness on the outside.' We identified a strong culture of 'doing the right thing', which the workforce understood. Last year, we assessed that the force needed to demonstrate that it had taken action to improve its treatment of all the people it serves with fairness and respect. The force has responded to this advice. Recently, for example, it worked with the local media to engage with the public and explain why the force was taking action against young black men suspected of trafficking drugs from London to Norfolk. To ensure that the force maintains its legitimacy in the eyes of the public, it took a similar approach to explain the presence of armed officers on patrol following the recent terrorist attacks.

### **Understanding of unconscious bias**

The workforce's understanding of unconscious bias is adequate. Its members can recognise unconscious bias and can show how they try to overcome it, in order to treat people with fairness and respect. No specific training takes place on unconscious bias but the subject is included in existing training programmes – on identifying and dealing with hate crime, on the use of stop and search and on how to engage with emerging communities, such as the county's large migrant community. The need to recognise and overcome prejudice forms an important part of the force's focus on vulnerability. This aims to ensure that the workforce recognises vulnerability among such groups as young people, people suffering from mental health problems, victims of domestic abuse and victims of hate crime. Staff with whom we spoke during the inspection provided examples of where they had recognised and overcome unconscious bias in making decisions. This concerned such matters as dealing with people with mental health problems, and with young people who go missing regularly.

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<sup>8</sup> *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: [www.app.college.police.uk/app-content/stop-and-search/](http://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/](http://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>

## **Communication skills**

Norfolk Constabulary considers that effective communication is an important part of the service it provides. The force offers initial recruits a specific training course in communication skills and includes such skills within other training and guidance for all officers and staff. The force assesses the effective communication skills of police officer applicants. They are included also in assessments of applications for promotion up to, and including, the role of chief inspector. Staff must demonstrate that they can communicate effectively with the public following a critical incident.<sup>9</sup>

Some of the workforce receive training on effective communication through existing training programmes. These include: officer safety training, designed to enable officers and front-line staff to explain their decisions and actions to manage potential conflict; training in listening skills, for those who take calls from members of the public within the force contact and control room and: those speaking with witnesses and interviewing suspects. The force provides additional training on empathy and listening skills to staff dealing with vulnerable people, such as the victims of sexual assaults.

## **Use of coercive powers**

Overall, the staff with whom we spoke had a good understanding of how to use their powers fairly and respectfully and could demonstrate their use of the police National Decision Model (NDM) and the Code of Ethics.<sup>10</sup> This understanding is supported by a strong culture of doing the right thing, which we found present throughout the organisation. Frontline officers receive safety training annually, which includes managing conflict and using force in a proportionate, justifiable way.

Frontline staff were aware of the importance of treating people fairly and with respect when using stop and search powers. We found evidence of officers receiving feedback from supervisors when they had recorded insufficient grounds or may have used their powers inappropriately. Overall, staff were aware of the need for proportionality when considering an arrest. The force routinely monitors those who have been arrested but whose detention is not considered necessary by the custody officer on arrival at a custody centre.

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<sup>9</sup> The College of Policing defines a critical incident as: any incident where the effectiveness of the police response is likely to have a significant effect on the confidence of the victim, their family and/or the community.

<sup>10</sup> The College of Policing states that the National Decision Model is suitable for all decisions and should be used by everyone in policing. It can be applied to a wide range of situations to structure a rationale of what they did during an incident and why.

## 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 force<sup>11</sup> 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,<sup>12</sup> 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

Norfolk Constabulary monitors its use of force regularly, to ensure it is being used appropriately, and identify any learning, to bring about improvements. The force complies with the national recording standard on the use of force. A report in 2015 from the NPCC<sup>13</sup> to the Home Secretary stated that Norfolk Constabulary had demonstrated that it collects significant amounts of data on the use of force.<sup>14</sup> In our 2015 inspection, we judged that officers used Taser fairly and appropriately. Officers authorised to use Taser had been trained appropriately. It was clear that they understood their duty to exercise good judgement and the importance of recording detailed reasons, to enable the public to scrutinise their actions.

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<sup>11</sup> 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](http://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/](http://www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/)

<sup>12</sup> *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](http://www.college.police.uk/What-we-do/Support/Equality/Documents/Independent_advisory_groups_advice_2015.pdf)

<sup>13</sup> The National Police Chiefs' Council (NPCC) brings police forces in the UK together to help policing coordinate operations, reform, improve and provide value for money.

<sup>14</sup> Report to Rt Hon Theresa May MP, Author: Chief Constable David Shaw, NPCC National Conflict Management Lead, 23 October 2015.

The force has analysed the use of force both in Norfolk and Suffolk constabularies, which has helped it to understand how force is being used and in what circumstances.<sup>15</sup> Statistics on the use of force are submitted regularly to the chief officers of the two forces who look at this information to identify any concerns or trends that might require further analysis. The force examines the forms that officers must complete when they use force, to identify whether things could have been done differently and improve training for frontline officers. The force told us of its plans to develop its governance arrangements and introduce a Coercive Powers Board. Chaired by a chief officer, this will bring together information and data on a range of powers and tactics that the force uses, such as stop and search and Taser, to ensure they are used appropriately.

### **External scrutiny to improve treatment**

Norfolk Constabulary's external scrutiny, which is designed to ensure it treats the people it serves with fairness and respect, is effective. Police Accountability Forums examine the performance of the constabulary regularly. Members of the public have an opportunity at these meetings to question the chief constable and the police and crime commissioner (PCC). The PCC, who manages these meetings, revised the format of the meetings recently, to make them more accessible to the public. Meetings are held no more than two months apart and rotate among the seven district councils.

Staff from the office of the police and crime commissioner (OPCC) support the independent advisory group (IAG). This comprises volunteers from different backgrounds in the community who offer opinions and advice to help improve the quality of policing services.<sup>16</sup> Members receive training, so they have sufficient knowledge to undertake their role. Usually, they remain on the group for three years. New members are recruited when a vacancy arises. The OPCC manages this recruitment. The details are available on the PCC's website. At the time of our inspection, only one force-level IAG was meeting at the force's headquarters. There were no local IAGs. There were no young people on the IAG, either. The group is well informed and supported, and meets senior representatives of the force every other month. HMICFRS observed several of these meetings chaired by a member of the IAG. We found that the group had a diverse make-up and was willing to challenge the force and senior officers. The force follows up concerns that the group raises in a timely manner. Recently, for example, it provided assistance designed to guarantee a fairer, more transparent superintendents' promotion process.

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<sup>15</sup> Norfolk and Suffolk Round Plan Research 2016.

<sup>16</sup> The independent advisory group (IAG) is a voluntary group of Norfolk residents from different community backgrounds who give their opinions and advice to help improve the quality of policing services.

The force uses various other networks to obtain feedback from different people across the county. These include the Norfolk community relations and equality board (CREB)<sup>17</sup> and the Norfolk community relations and equality network (CREN).<sup>18</sup> Feedback from these groups is used to improve the quality of a range of public services, including the police, based on challenge from communities who may have lower levels of confidence in the police. The force would like young people to become more involved, and provide feedback and challenge on how it provides services and uses its powers, particularly stop and search. It plans to establish a youth independent scrutiny panel to further this ambition. In the meantime, the force engages with members of the police cadet scheme on questions of treatment, among other matters.

## **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.<sup>19</sup>

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.<sup>20</sup> Our 2015 legitimacy inspection<sup>21</sup> found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we

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<sup>17</sup> The Norfolk community relations and equality board has wide membership, drawn from the local district, county council, police and voluntary organisations.

<sup>18</sup> The Norfolk community relations and equality network brings equality and community development practitioners in the public and voluntary sector together, so that they can discuss shared equality problems and network with each other.

<sup>19</sup> *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: [www.app.college.police.uk/app-content/stop-and-search/](http://www.app.college.police.uk/app-content/stop-and-search/)

<sup>20</sup> *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/](http://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/](http://www.justiceinspectorates.gov.uk/hmicfrs/publications/best-use-of-stop-and-search-revisits/)

<sup>21</sup> *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: [www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/)

reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.<sup>22</sup> Also, we assessed how the forces scrutinise use of these powers.

### **Understanding of national guidance**

Overall, the frontline officers with whom we spoke in Norfolk Constabulary understand how to use their stop and search powers lawfully, fairly and respectfully. All frontline staff have completed the online course that the College of Policing has developed. The force updates officers regularly to ensure they have the knowledge to use their power correctly. The force has responded to changes in the national guidance produced by the College of Policing. The assistant chief constable for local policing produced an online video for staff recently, explaining these changes. The professional standards department (PSD) provides further guidance, so that learning is passed on to frontline staff on the appropriate use of the power. The force has held focus groups among frontline staff to measure the effectiveness of this approach and is developing a one-day training session. This will be held later this year.

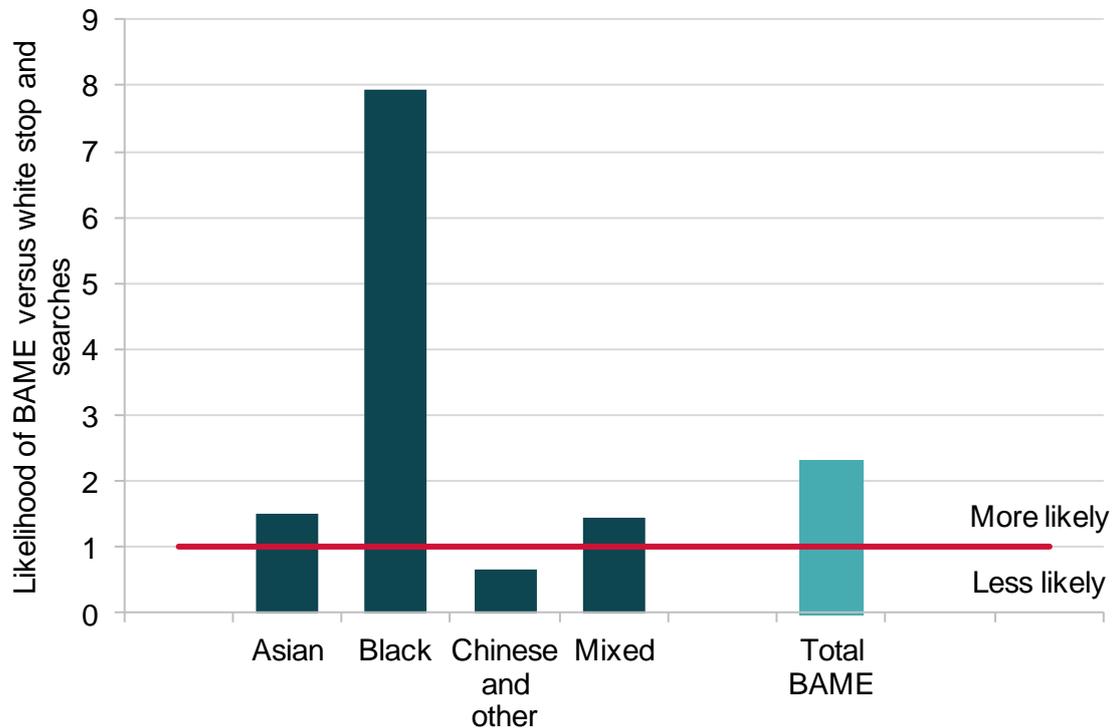
### **Monitoring use of stop and search powers to improve treatment**

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, black, Asian and minority ethnic (BAME) people in the local population served by Norfolk Constabulary were 2.3 times more likely to be stopped and searched than white people. Black people were 7.9 times more likely to be stopped and searched than white people. This was the greatest difference in any ethnic group in the force area, compared with white people, looking at the likelihood of being stopped and searched.

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<sup>22</sup> See annex A for more information about the methodology for our review of stop and search records.

**Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people in the local population of Norfolk Constabulary being stopped and searched (under section 1, PACE)<sup>23</sup> compared with white people, in the 12 months up to 31 March 2016**



Source: Home Office 2016

Norfolk Constabulary examines its use of stop and search regularly to ensure the power is being used appropriately, and to identify any learning needed to improve its treatment of those who have been subjected to the power. Supervisors, along with inspectors, look at the stop and search forms that officers complete, providing an additional level of oversight. A section on the stop and search form that the force uses asks whether the person being searched feels they have been treated fairly – and whether they understood the reasons for the search. The officer completes this form while the member of public is present. All stop and search forms are reviewed. Also, a supervisor contacts any member of the public who feels they did not understand the grounds for the search, or who feels they were treated unfairly. The PSD provides further guidance and transmits learning to frontline staff on the appropriate use of the powers.

Information on the use of stop and search is sent to district management teams to discuss, so they can identify any trends in the use of the power. At a force level, the joint public encounters improvement partnership with Suffolk Constabulary examines the use of stop and search at a quarterly meeting. A senior police officer that is the lead for stop and search, or a county policing commander, chairs this meeting. The joint performance and analysis department with Suffolk Constabulary examines all

<sup>23</sup> Police and Criminal Evidence Act 1984. Available at: [www.legislation.gov.uk/ukpga/1984/60/section/1](http://www.legislation.gov.uk/ukpga/1984/60/section/1)

the data on all aspects of stop and search comprehensively. It looks at the data to identify trends and improve the ways in which the force trains and equips its workforce. The force is aware of the level of disproportionality in its use of stop and search and is conducting analysis to identify the proportion of people stopped and searched who do not live in Norfolk. This will give the force a better understanding of the disproportionate use of stop and search, so that it can respond appropriately. In addition, the force's equalities board studies the use of stop and search involving members of the public with protected characteristics, to ensure the force is complying with the Equalities Act 2010.

The force is in the process of introducing body-worn video to frontline staff and plans to look at the footage to be sure that officers are exercising their stop and search powers appropriately.

### **External scrutiny of stop and search powers to improve treatment**

External scrutiny of the use of stop and search in Norfolk Constabulary is effective, and ensures that the powers are being used appropriately – and in order to identify any learning that may improve the treatment of those subjected to the powers. The force's independent advisory group (IAG)<sup>24</sup> and the independent stop and search scrutiny panel (ISSSP)<sup>25</sup> supply external scrutiny on the use of stop and search. The force has provided members of both groups with awareness training on the legal use of the powers and on how the force uses the powers. Members have the opportunity to observe officers on patrol and how the powers are used. The IAG meets every month while the ISSSP meets quarterly.

At each meeting, the IAG receives an update on the use of stop and search, including the quarterly data considered at the Public Encounters Improvement Partnership. A member of the IAG also sits on the ISSSP and reports back to it.

The ISSSP reviews stop and search forms to provide an independent assessment from a public perspective and decide whether they include grounds that are reasonable. At its quarterly meetings, the ISSSP examines all forms relating to stop and searches carried out on members of BAME communities and a similar number relating to members of white communities. The ISSSP also examines all stop and search forms that have been subject to a complaint. It reviews the force's quarterly improvement and evaluation report on the use of stop and search. Officers receive feedback on any encounters where it is felt that the grounds recorded were insufficient, or that give rise to other causes for concern. HMICFRS found evidence

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<sup>24</sup> The Independent Advisory Group (IAG) is a voluntary group of Norfolk residents from different community backgrounds who give their opinions and advice to help improve the quality of policing services.

<sup>25</sup> The Independent Stop and Search Scrutiny Panel (ISSSP) scrutinises the Constabulary's use of stop and search.

of this feedback taking place during our inspection. Norfolk Constabulary is seeking to expand its external scrutiny of stop and search to include the views of young people. It has run several youth ISSSPs with police cadets and with members of local youth and community groups. It has held focus groups in schools on stop and search as well. Detailed information explaining the force's use of stop and search is published regularly on the force's website in order to promote local accountability.<sup>26</sup>

### **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 recorded on the stop and search record.<sup>27</sup>

In our 2013 inspection into the police's use of stop and search powers,<sup>28</sup> we were concerned to see that of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify lawful use of the power. For Norfolk Constabulary, the 2013 inspection showed that nine of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,<sup>29</sup> we carried out a further review of the recorded grounds in a sample of inspection, we found that 14 of the 99 records we reviewed did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records. This time, eight did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records that the force completed, our findings indicate that some officers and supervisors either still do not understand fully what constitutes reasonable grounds, or do not know how to record them properly.

It is 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.

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<sup>26</sup> [www.norfolk.police.uk/about-us/our-policies/stop-and-search](http://www.norfolk.police.uk/about-us/our-policies/stop-and-search)

<sup>27</sup> Police and Criminal Evidence Act 1984 Available at: [www.legislation.gov.uk/ukpga/1984/60/contents](http://www.legislation.gov.uk/ukpga/1984/60/contents)

<sup>28</sup> *Stop and Search Powers: Are the police using them effectively and fairly?* HMICFRS, 2013. Available at: [www.justiceinspectorates.gov.uk/HMICFRS/publications/stop-and-search-powers-20130709/](http://www.justiceinspectorates.gov.uk/HMICFRS/publications/stop-and-search-powers-20130709/)

<sup>29</sup> *PEEL: Police legitimacy 2015* HMICFRS 2016 Available at: [www.justiceinspectorates.gov.uk/HMICFRS/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/HMICFRS/publications/police-legitimacy-2015/).

In 29 of the 200 records we reviewed, the item searched for was found. This is an important measure, as the primary purpose of the powers is to confirm or allay an officer's suspicions. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

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

	2013	2015	2017
Records not containing reasonable grounds	9 of 200	9 of 99	8 of 200
Item searched for found	-	-	29 of 200

## Summary of findings



**Good**

Norfolk Constabulary is good at treating the people it serves with fairness and respect. We identified a strong culture of 'doing the right thing' among the workforce. The force ensures its workforce receives training that covers unconscious bias and how to overcome it, effective communication skills and use of coercive powers such as force and stop and search. Frontline officers have a good understanding of how to use their coercive powers fairly and respectfully. The force also works with the local media to help explain the use of these powers and how effectively it is treating people with fairness and respect.

The force has effective methods for internal scrutiny of use of force and stop and search to ensure these powers are being used fairly. Learning identified from this scrutiny influences the training the force provides to its workforce. External scrutiny is provided through public meetings and by an independent advisory group and independent stop and search scrutiny panel, which have a diverse membership. The force provides members of the groups with training to help them perform their role effectively and is seeking to expand the involvement of young people. Norfolk Constabulary is issuing frontline officers and staff with body-worn video cameras, which will enable further scrutiny.

## 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,<sup>30</sup> as opposed to last year's focus on how well forces are guarding against corruption.<sup>31</sup>

## 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.<sup>32</sup> Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.<sup>33</sup> 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.<sup>34</sup>

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<sup>30</sup> *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: [www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/)

<sup>31</sup> 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/](http://www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/)

<sup>32</sup> *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at: [http://whatworks.college.police.uk/Research/Documents/150317\\_Integrity\\_REA\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf)  
*The role of leadership in promoting ethical police behaviour*, College of Policing, 2015. Available at: [http://whatworks.college.police.uk/Research/Documents/150317\\_Ethical\\_leadership\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf)

<sup>33</sup> *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: [www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx](http://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/](http://www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/)

<sup>34</sup> 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**

The workforce in Norfolk Constabulary views its leaders as ethical role models. It considers the chief officer team are considered highly visible, approachable and open to feedback and challenge. The force publishes the business interests and details of any gifts or hospitality that chief officers receive on its website – although this information was difficult to find. The joint professional standards department (PSD) fosters a culture of learning rather than punishment if mistakes are made. The force regularly reviews complaints and feedback from the public. Lessons learned from this are fed back to the workforce through the 'learning times' publication and through incorporation into a range of force training programmes.

The force considers the ethical implications of important decisions through the ethics board, which a member of the IAG chairs alongside representatives from the Police Federation and UNISON. HMICFRS observed one of these meetings and found that members appeared comfortable in questioning the force and senior officers. Concerns that the group raised were dealt with in a timely manner. While members of the workforce can submit ethical problems to the board, the force recognises that it needs to raise the board's profile if it wishes the workforce to make a greater contribution to it.

## **Ethical decision making**

HMICFRS found that the force takes into account questions of equality and the Code of Ethics in terms of its policies, to ensure they are fair and do not discriminate against any section of the public or the workforce. The force regularly seeks advice from the IAG on new policies, or on policies that it is renewing or revising. It publishes its policies and associated assessments on the effect of equality on the force's website, so they are transparent.<sup>35</sup> The force also publishes minutes of a variety of meetings and subsequent decisions on its website regularly, so that its decisions are available to the public.

We spoke to a number of operational officers and staff who were aware that decisions must be capable of withstanding independent scrutiny at a later stage. Officers and staff use the NDM,<sup>36</sup> which includes the police service Code of Ethics, to inform decisions that arise during contact with the public. We found that all officers and frontline staff receive refresher training on the importance of making fair

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replaced in October 2017 by the Vetting Code of Practice and Vetting Authorised Professional Practice. Available at: [www.app.college.police.uk/app-content/professional-standards/vetting/](http://www.app.college.police.uk/app-content/professional-standards/vetting/)

<sup>35</sup> More information can be found at: [www.norfolk.police.uk/about-us/our-policies](http://www.norfolk.police.uk/about-us/our-policies)

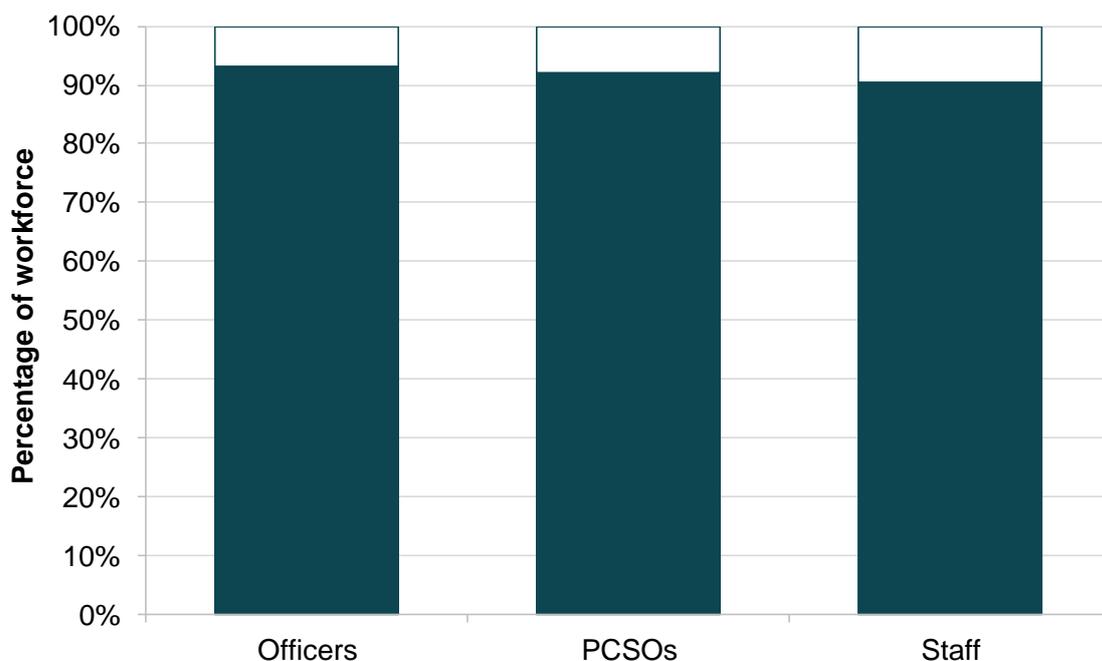
<sup>36</sup> The College of Policing states that the National Decision Model (NDM) is suitable for all decisions and should be used by everyone in policing. It can be applied to a wide range of situations to structure a rationale of what they did during an incident and why. More information can be found at: [www.app.college.police.uk/app-content/national-decision-model/](http://www.app.college.police.uk/app-content/national-decision-model/)

decisions and on treating people with respect. A range of force training programmes deals with such matters, including training on officer safety and on stop and search. Ethical dilemmas are presented and discussed in the course of such programmes.

## Vetting

It is important that re-vetting takes place regularly and before an individual is promoted or posted to a high-risk unit. During this year's inspection, we asked Norfolk Constabulary to provide data on the percentage of its workforce that had received up-to-date security clearance. The data we received showed that on 31 January 2017, across Norfolk Constabulary and Suffolk Constabulary, 93 percent of officers, 92 percent of PCSOs, and 90 percent of staff had received up-to-date security clearance (see Figure 2). Norfolk Constabulary and Suffolk Constabulary collaborate on a vetting unit. The joint IT system makes it impossible to separate the vetting records for the two forces, so all the figures are for both forces.

**Figure 2: Percentage of officers, PCSOs, and staff with up-to-date vetting checks in Norfolk and Suffolk forces as of 31 January 2017**



**Source: HMICFRS Legitimacy data collection**

Norfolk Constabulary has made progress since last year's inspection in appropriately vetting its staff for the roles they undertake, and in complying fully with national vetting standards.

During our 2016 legitimacy inspection, we considered the extent to which the force was developing and maintaining an ethical culture through effective vetting. We found that Norfolk Constabulary was not complying with all aspects of the national standards because vetting had expired for approximately 1,500 officers and staff within the force. Most of these officers had served for between 10 and 15 years and had not moved much within the force in terms of rank or grade. In our 2017

inspection, we assessed the force's plan to deal with this problem and found plans in place to reduce the number of people whose vetting had expired. Meanwhile, however, the force is recruiting student police officers and staff, adding to the pressure on the vetting unit. The force has recruited four extra vetting staff to reduce the backlog. A process is now in place whereby the vetting unit is informed when any person moves roles within the force and the current vetting status of the individual is checked and updated where necessary. Staff and officer lists held by HR are also being reviewed and cross-referenced with information held on the vetting unit database to identify any people that require re-vetting. The force expects to take six to 12 months to solve the problem completely. The force is prioritising vetting for posts that are exposed to the greatest risk.

## **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.<sup>37</sup> 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**

Norfolk Constabulary publishes comprehensive information for members of the public wishing to make a complaint on its website, under the Compliments and Complaints section.<sup>38</sup> This includes information on how to make a formal complaint, the information needed to assist an investigation and how to obtain additional support, such as translation and advocacy services. We found the IPCC leaflet – which explains how to make a complaint – available within public reception areas of police buildings. Staff knew what action to take if a member of the public wishes to make a complaint, including providing support for those whose first language is not English. Recently, the force designed a new poster containing the information that the public needs to make a complaint. It sought advice from the IAG in preparing this poster, which may be found in all police public reception areas, in police detention

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<sup>37</sup> 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](http://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](http://www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf)

<sup>38</sup> More information can be found at: [www.norfolk.police.uk/contact-us/compliments-and-complaints](http://www.norfolk.police.uk/contact-us/compliments-and-complaints)

facilities, local authority buildings and in a range of support organisations. It supplies information to communities that are harder to reach or that may have less confidence in the police. A leaflet provided to victims of crime, outlining their rights and entitlements under the victims' code of practice, provides information on how to make a complaint – or compliment those taking the report or investigating the incident.

### **Keeping complainants updated**

Norfolk Constabulary and Suffolk Constabulary have formed a joint PSD to investigate complaints from members of the public and cases of internal misconduct. The joint PSD updates members of the public who make a complaint regularly – but it could do more to make those updates more informative. We felt also that the force could do more to provide the same level of service to those facing internal misconduct investigations.

Once a force starts to investigate a public complaint, the Police (Complaints and Misconduct) Regulations 2012 requires it to keep the complainant informed of progress at least every 28 days. Updates should contain enough information to be meaningful. As part of this year's inspection, we assessed 50 public complaints reported across Norfolk and Suffolk to see whether the force had provided timely, meaningful updates to the complainants. Of the 50 cases we reviewed, we assessed that 32 recorded regular updates. Of that number, 30 were judged sufficiently informative.

Although this legal requirement applies only to complainants who have made public complaints, we looked for the provision of a similar level of service to those who are subject to misconduct allegations that have not arisen from a public complaint. We assessed that only three of the 26 investigations we reviewed recorded regular updates to those involved. Only one was judged sufficiently informative.

When investigations of public complaints are completed, the force must supply the complainant with the findings of the report, with its own determinations and with the right of appeal. We found that 48 of the 50 complaint files we looked at contained evidence that all of these legal requirements had been met.

## **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.<sup>39</sup>

### **Identifying and responding to potential discrimination**

The force identifies and responds adequately to allegations of potential discrimination. The workforce has a good understanding of discrimination and unconscious bias, and provides training on these subjects to frontline officers and staff. Training on discrimination is included also within the development programme for sergeants, who are often the first point of contact in responding to allegations of discrimination from the public or staff.

During our case file review, we looked at 20 complaints and six internal misconduct cases that the Norfolk and Suffolk constabularies had identified as containing an allegation of discrimination. We looked also at an additional 30 complaints and 20 misconduct cases that we considered might contain unidentified allegations of discrimination. We found six additional complaint cases that the forces had failed to identify. The force needs to do more to record all allegations correctly. In the 20 cases of internal misconduct that we reviewed, we found that discrimination had been identified on each occasion correctly.

The Police (Complaints and Misconduct) Regulations 2012 requires forces to refer more serious matters to the IPCC if they are aggravated because it is alleged that discrimination was a reason for the behaviour. HMICFRS found that the force had referred 18 of the 19 public complaints that met the referral criteria to the IPCC appropriately. However, it had not referred either of the two cases of misconduct that met the referral criteria. The force needs to refer all cases that meet the mandatory referral criteria to the IPCC.

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<sup>39</sup> 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](http://www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/Guidelines_for_handling_allegations_of_discrimination.pdf)

The force reviews all public complaints and internal misconduct investigations regularly, to help it learn from mistakes. Learning on how to do things better is circulated to the workforce through an internal bulletin. We found evidence that the organisation was incorporating this learning into the training it gives its workforce.

### **Investigating allegations of discrimination**

Norfolk Constabulary is good at investigating allegations of discrimination against police officers and staff. Serious and complex investigations, including those which may amount to misconduct, are investigated by the joint PSD with Suffolk Constabulary. Other allegations are investigated by a supervisor at a local level.

The force ensures that officers are appropriately trained and have the required skills and knowledge to apply the IPCC guidelines for the handling of allegations of discrimination. Two supervisors within the joint PSD received training directly from the IPCC when the guidance was launched, and then trained the officers and staff within the joint PSD, and ensure that any new officers and staff joining the department also receive this training. An investigation guide has been written to support this training and it is updated when necessary by the supervisors within the joint PSD. Although there is no specific training for local supervisors they are provided with the investigation guide and full guidelines for dealing with complaints and allegations of discrimination are accessible to them electronically and they can also obtain advice by speaking directly to staff within the joint PSD.

Our review of 20 public complaints that contained allegations of discrimination assessed that it had investigated 19 to a satisfactory standard, with no evidence of bias. Overall, complainants received a good service. In addition, our review of police staff misconduct and fairness at work showed that concerns were investigated to a similarly satisfactory standard. As part of our inspection, we spoke with a representative of the IPCC who said the joint PSD was led well and conducted high-quality investigations. The force's strategic equalities and inclusion board monitors complaints that contain allegations of discrimination to identify trends and ensure the force learns from its mistakes.

## **Summary of findings**



**Good**

Norfolk Constabulary is good at ensuring its workforce behaves ethically and lawfully. The force's policies are based on the Code of Ethics; new and revised policies are scrutinised by the independent advisory group and are available to the public on the force's website. Leaders are good role models and are open to feedback and challenge. The force's ethics board considers the ethical implications of important decisions.

The force does not comply fully with national vetting standards because of a large number of officers whose vetting has expired. However, it has plans to address this and is prioritising vetting for posts that have the highest risk.

Norfolk Constabulary has comprehensive information on its website on how to make a complaint, including how to access additional support such as translation and advocacy services. Police public reception areas, police detention facilities and local authority buildings display posters that provide information on how to make a complaint, which are also displayed by other support organisations to reach those communities who may have less trust and confidence in the police.

The force identifies and responds adequately to allegations of potential discrimination. The workforce receives training on discrimination and has a good understanding. However, the force needs to do more to ensure that all allegations are recorded correctly. The joint professional standards department is good at investigating cases involving allegations of discrimination but needs to ensure it identifies all allegations of discrimination, refers to the IPCC all cases that meet the mandatory criteria and consistently provides informative updates to complainants and those who are the subject of allegations. The force routinely reviews all public complaints and internal misconduct investigations to ensure it learns from its mistakes.

#### **Areas for improvement**

- The force should improve the quality and timeliness of updates to complainants, including matters of misconduct, in line with IPCC statutory guidance.
- The force should improve the level of understanding among its workforce so they can identify and respond appropriately to initial reports of discrimination at the earliest opportunity.

## 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.<sup>40</sup> 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.<sup>41</sup> HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances<sup>42</sup> – to identify, understand, prioritise and resolve their workforces’

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<sup>40</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

<sup>41</sup> *Ibid.*

<sup>42</sup> 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.<sup>43</sup>

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.<sup>44</sup> 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.<sup>45</sup>

### **Leaders seeking feedback and challenge from the workforce**

Norfolk Constabulary encourages feedback and challenge from the workforce in a number of ways. They include the ‘Ask the Chief’ email facility (which can be used anonymously), web chats with chief officers, staff leadership forums, seminars and online blogs by senior officers. Staff can speak directly to their supervisors and line managers as well. There are various staff associations. Recently, the force started a series of forums. Known as sounding boards, and held locally, they provide an opportunity for local officers and staff to raise concerns. Anyone can attend these meetings, which people of any rank or role may chair. Concerns identified by the workforce are then discussed at a single force-level meeting that the chief constable chairs. The force has responded to our concerns that it had not conducted an internal staff survey for several years and conducted a joint internal staff survey with Suffolk Constabulary in January 2017 to assist both forces in understanding the concerns of the workforces.<sup>46</sup>

The chief constable meets new staff transferring to the force and asks to meet them again, later on, to discuss what works well or could be improved. The force is listening to and responding to concerns that the workforce raises. Recently, for

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<sup>43</sup> *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](http://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](http://www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf)

<sup>44</sup> 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](http://www.legislation.gov.uk/ukpga/2010/15/section/4)

<sup>45</sup> 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/](http://www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/)

<sup>46</sup> 2015 HMICFRS Legitimacy inspection.

example, it upgraded the quality of the equipment carried in police patrol vehicles, to improve public and officer safety when dealing with road collisions.

### **Identifying and resolving workforce concerns**

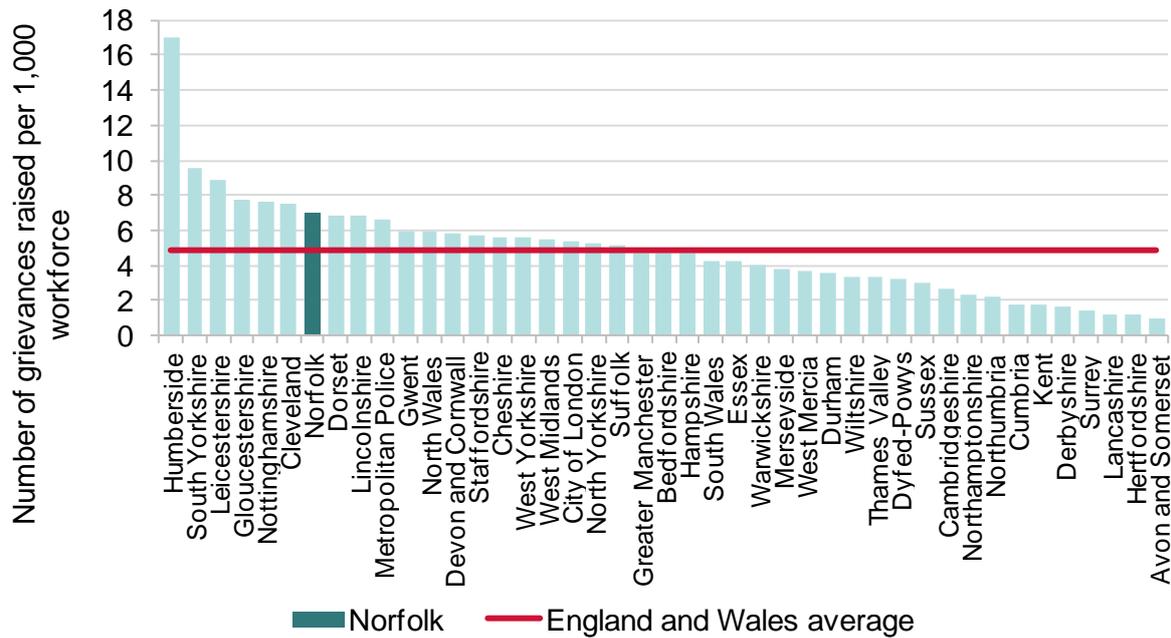
Norfolk Constabulary can demonstrate that it is identifying and resolving the concerns of its workforce effectively. A number of ways exist for officers and staff to raise concerns personally, confidentially or via the various staff associations. Overall, the workforce feels confident that its views are heard. The force has shown that it takes action to address concerns. A recent example of this was a perception among part of the workforce that the promotion and selection processes were unfair. Now, the force removes names from application forms before they are assessed and an independent member sits on recent promotion boards. Usually, this independent member is invited from the IAG, but may be also a representative of another partner agency or staff association.

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

All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 3 below shows that Norfolk Constabulary had 6.9 grievances raised per 1,000 workforce. This is higher than the England and Wales average of 4.9 grievances raised per 1,000 workforce.

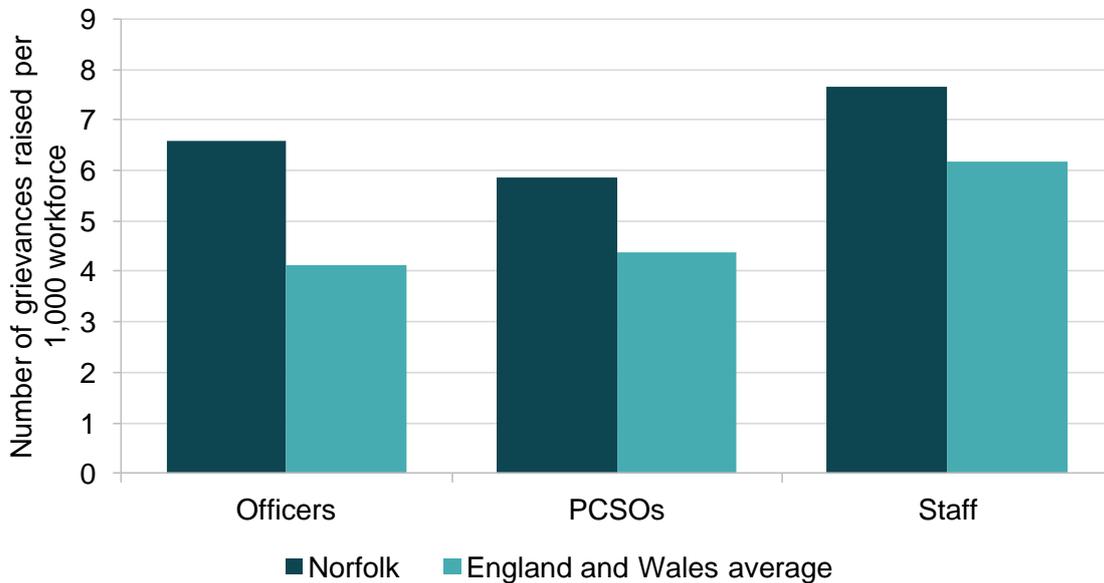
Figure 4 shows that the number of grievances raised by officers in Norfolk Constabulary was 6.6 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period PCSOs raised 5.9 grievances per 1,000 PCSOs, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 7.7 grievances per 1,000 staff in the same period; and the England and Wales average was 6.2 grievances per 1,000 staff.

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



Source: HMICFRS Legitimacy data collection

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



Source: HMICFRS Legitimacy data collection

Officers and staff can use the established fairness at work (grievance) procedure if they feel they have been treated unfairly. The joint HR department with Suffolk Constabulary investigates any concerns raised. As part of our inspection, we reviewed 20 grievances across both Norfolk and Suffolk to see how they had been investigated, and whether the force had supported all of those involved. We judged

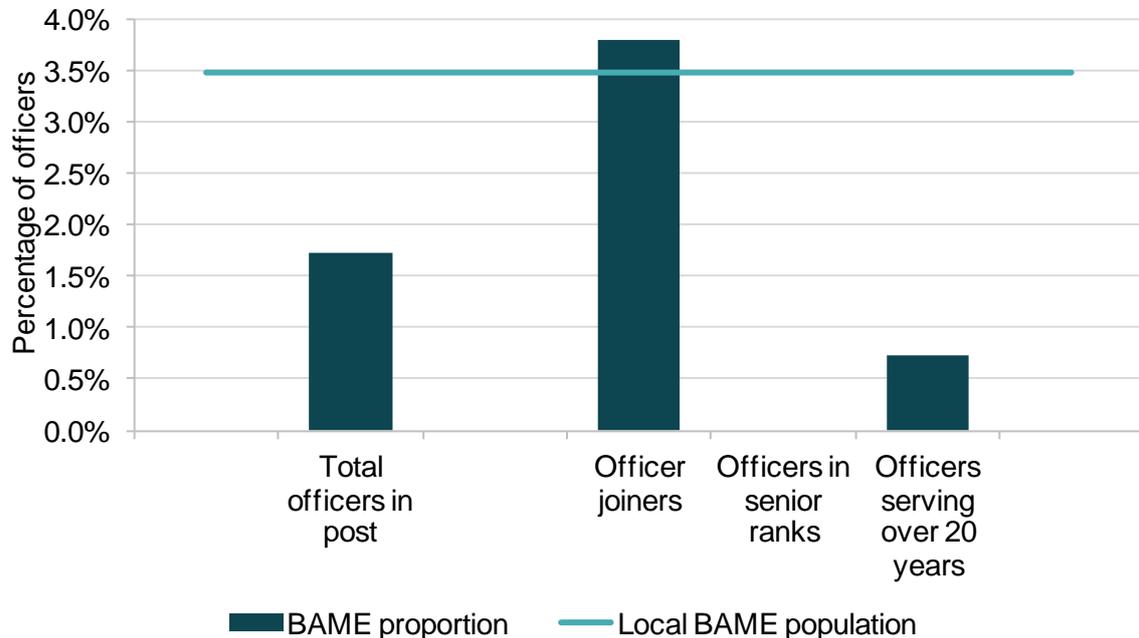
that the force had identified, investigated and resolved all the cases properly and in line with the Acas Code of Practice and Guidance. There was also a record that appropriate arrangements had been made to support the employee or the witnesses throughout the process.<sup>47</sup> The grievance procedure has resulted in the force changing the way it deals with staff. One example of this is in its work with officers who are about to take maternity leave.

### 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 that the force had recruited, the number at senior officer level, and who have served for over 20 years. We used these data to compare the make-up of the force with that of the community it serves.

In the geographical areas that Norfolk Constabulary serves, the 2011 census indicated that BAME people made up 3.5 percent of the local population. In 2016/17, 1.7 percent of officers in Norfolk Constabulary were BAME (see Figure 5). In terms of officers, 3.8 percent of those joining the constabulary, 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 and minority ethnic (BAME), in Norfolk Constabulary in 2016/17, compared with the percentage of BAME people in the local population**

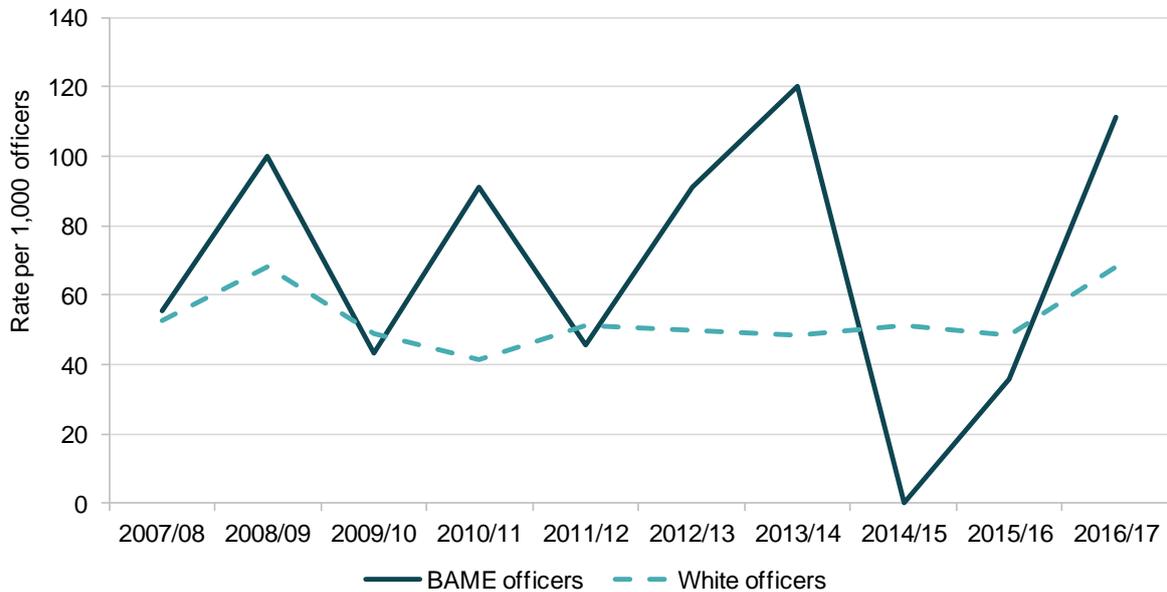


Source: Home Office Annual Data Requirement

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

<sup>47</sup> Acas Code of Practice and Guidance. [www.acas.org.uk/index.aspx?articleid=2174](http://www.acas.org.uk/index.aspx?articleid=2174)

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

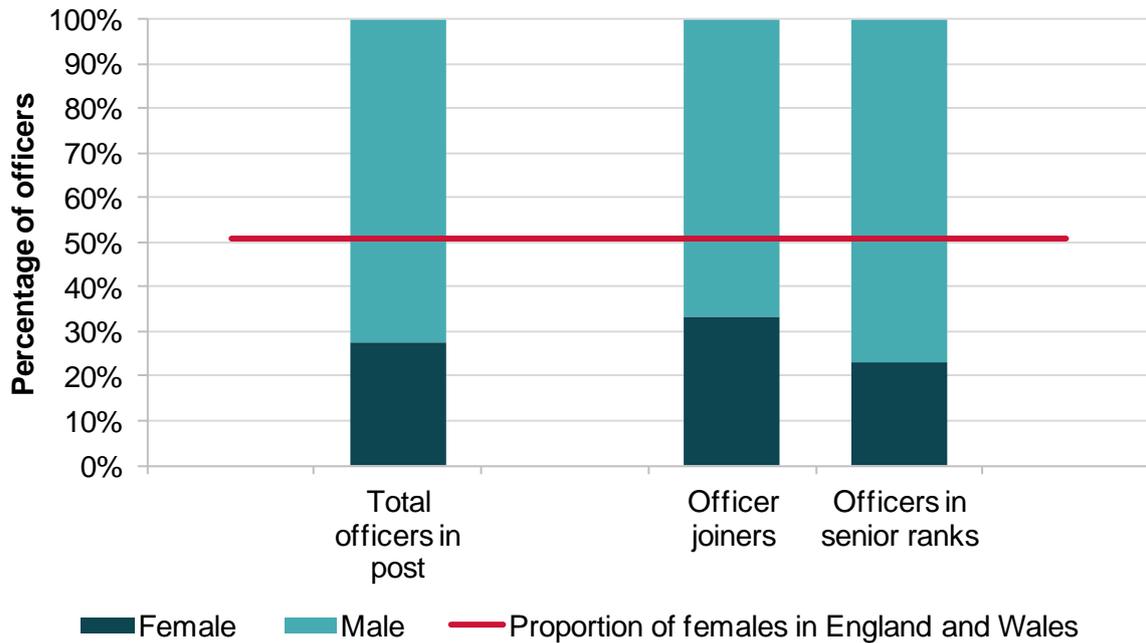


**Source: Home Office Annual Data Requirement**

In 2016/17, 111 of the equivalent of every 1,000 BAME officers left Norfolk Constabulary (see Figure 6), while 68 of every 1,000 white officers left the force. Fluctuations in the BAME officer leaver rate may be due to the low number of BAME officers in the force.

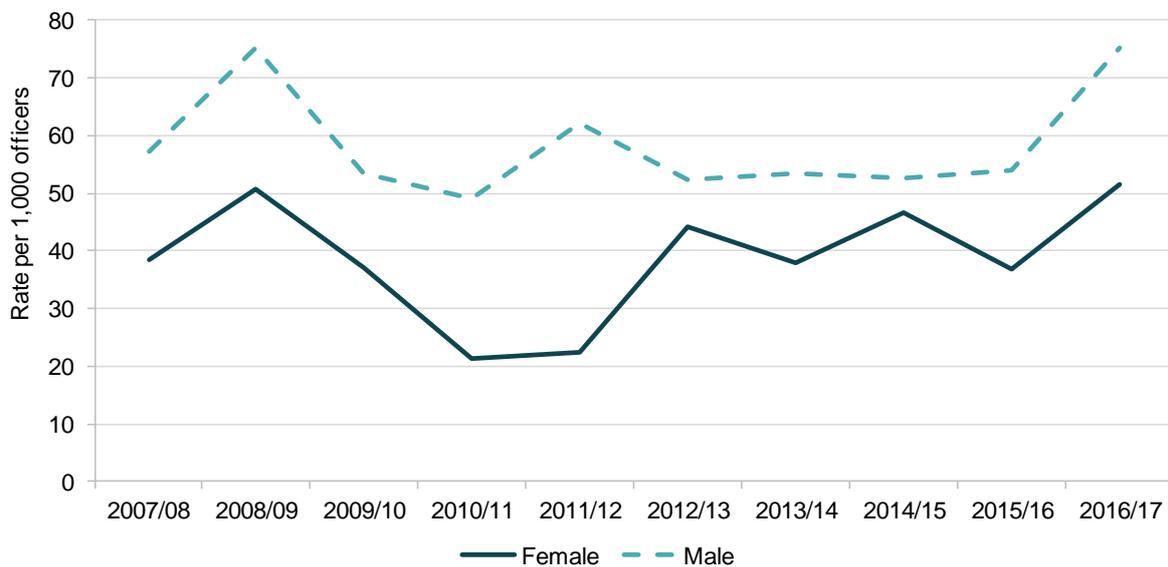
The proportion of female officers in the force, at 28 percent, is lower than the proportion of females in the general population – 51 percent. In the 12 months to 31 March 2017, 34 percent of those joining Norfolk Constabulary and 23 percent of those in senior ranks were female (see Figure 7).

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



Source: Home Office Annual Data Requirement

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



Source: Home Office Annual Data Requirement

In 2016/17, 52 female officers per 1,000 officers left Norfolk Constabulary, compared to 75 male officers per 1,000 officers.

Norfolk Constabulary is taking steps to counter the disproportionate nature of its workforce and make it more representative of the communities it serves. The force

has published a joint Police Officer Recruitment and Positive Action Strategy with Suffolk Constabulary and employed a diversity and equalities manager to advise and support the force in making its workforce more representative. It has made good progress in recruiting staff from a more diverse selection of the community. The force has not set targets to recruit people from under-represented groups. However, it is trying to make its recruitment processes as open and fair as possible, so that more people from these groups apply. The force is using social media to target under-represented groups and has produced a number of videos for use on social media. These cover topics such as the recruitment process, training and the duties undertaken by staff.

The force has a good understanding of the current level of diversity among officers, staff, PCSOs and the Special Constabulary, as well as of the diversity within its many communities. Between April 2016 and March 2017, the force welcomed 80 new police officer recruits. Of these, 3.8 percent (three recruits) are from a BAME background and 34 percent (27 recruits) are female. While the force is making progress in recruiting a more diverse workforce, it is also working to ensure that these officers remain in the organisation and make progress. The force is able to track all police officer and PCSO applications from BAME applicants and those with other protected characteristics from their first enquiry through to their appointment. It can identify and remove any barriers identified within the recruitment process and plans to extend such tracking throughout the promotion process. The joint Equalities Board with Suffolk Constabulary, chaired by a deputy chief constable, monitors disproportionality across all groups with protected characteristics. The group meets quarterly to identify and respond to any identified barriers preventing recruitment, retention and progression.

The force understands the importance of addressing disproportionality in misconduct allegations as well. The deputy chief constable holds monthly portfolio meetings with the head of the joint PSD with Suffolk Constabulary. The force does not have a problem with disproportionality in relation to misconduct; however, it has established mechanisms to monitor this problem closely.

## **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.<sup>48</sup> HMICFRS

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<sup>48</sup> *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: <https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/> Also see <https://fitforwork.org/employer/benefits-of-a-healthy-workforce/>

assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

### **Understanding and promoting wellbeing**

Norfolk Constabulary is good at understanding and promoting the wellbeing of its workforce. Since our 2016 inspection, it has continued to improve the services it provides. The wellbeing of the workforce remains important to the constabulary, which shares provision of wellbeing services with Suffolk Constabulary. The two forces have established a joint occupational health, safety and wellbeing strategy. Recently, the force revised its approach to delivering wellbeing services to create a more proactive, targeted service, based on sound evidence of what works. Overall, we found that staff and supervisors were aware of the welfare services available and of how to access them. They commented favourably on the quality and timeliness of the services provided.

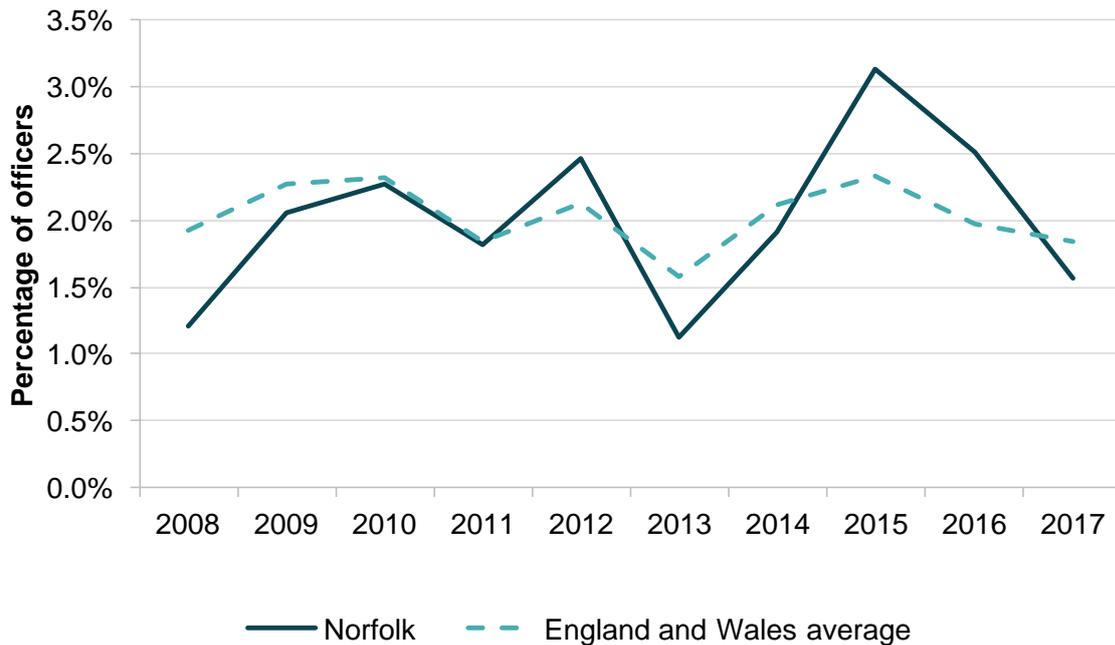
The force is doing more to promote understanding of workforce wellbeing throughout the organisation. It is holding master classes for supervisors on how best to manage staff on restricted duties, or staff who may be recovering from illness or injury. Also, it has hosted drop-in sessions for managers to raise awareness of mental health.

### **Identifying and understanding workforce wellbeing needs**

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

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short/medium-term sickness absence. On 31 March 2017 in Norfolk Constabulary, 1.6 percent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 percent. The latest year for which data is available was 2017 which saw a decrease of 0.9 percentage points from the previous year, which is in line with changes in the last ten year period (see Figure 9).

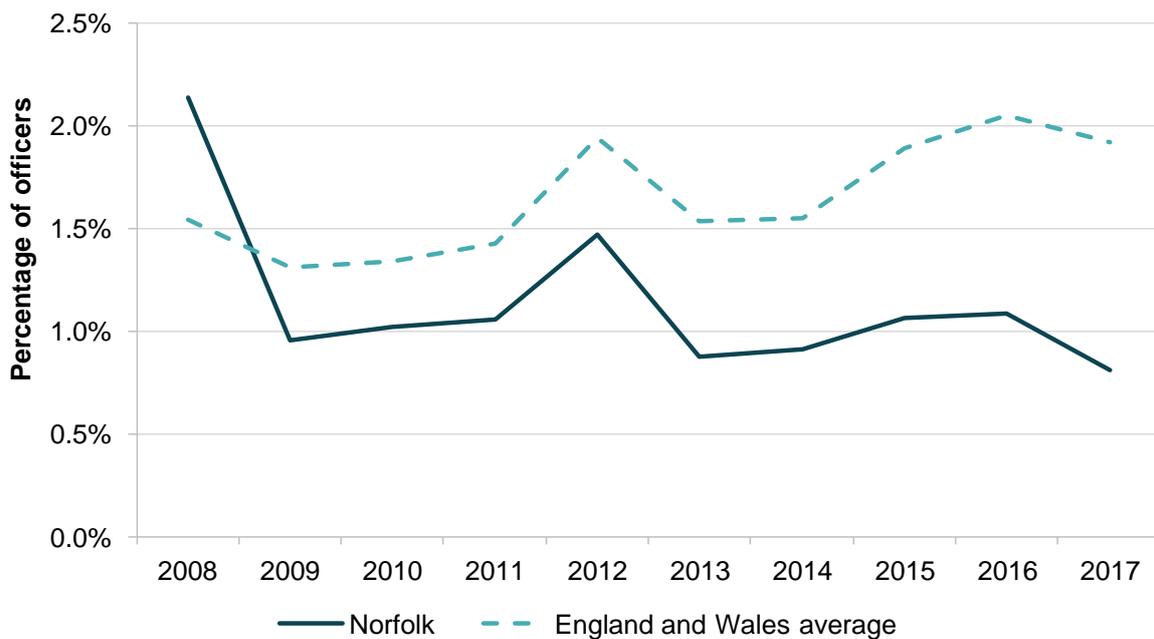
**Figure 9: Percentage of officers on short or medium-term sick leave, in Norfolk Constabulary compared with the England and Wales average, on the 31 March from 2008 to 2017**



**Source: Home Office Annual Data Requirement**

On 31 March 2017 the proportion of officers in Norfolk Constabulary on long-term sick leave was 0.8 percent and the England and Wales average was 1.9 percent. The latest year for which data were available is 2017 which saw a decrease of 0.3 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 Norfolk Constabulary compared to the England and Wales average, as at 31 March from 2008 to 2017**



**Source: Home Office Annual Data Requirement**

Norfolk Constabulary has a good understanding of the welfare needs of the workforce and is using more accurate sickness data to develop such understanding. The introduction of new HR IT system in 2015 has improved the quality of the sickness information that is available. The organisational absence management group, chaired by the head of HR, reviews this information regularly. It includes the number of additional working hours and days off worked by officers and staff. Various daily force management meetings monitor incidents in which officers or staff have been injured in the performance of their duties. Recently, the force revised its approach to provide a more targeted service to reduce sickness absence. This approach is contained within its workforce wellbeing strategy 2017-18. The force's health and wellbeing working group has tightened the links between health and safety and workforce wellbeing to better identify those matters affecting the physical and mental wellbeing of the workforce.

In last year's HMICFRS inspection, we judged Norfolk Constabulary as good at identifying and understanding the workforce's wellbeing needs. However, HMICFRS identified that it could do more to understand fully and take appropriate action to address high levels of short and medium-term sickness among officers and staff. The force has made some progress, and the overall number of officers and staff off work through sickness has fallen. However, the total number of sickness hours recorded has risen. Further analysis is being conducted by the joint performance and analysis department (JPAD), shared with Suffolk Constabulary, to fully understand the underlying causes of this, so appropriate action can be taken. The findings are due to be presented to the joint organisational board in August 2017.

### **Taking preventative and early action to improve workforce wellbeing**

Norfolk Constabulary is good at taking preventative action to improve workforce wellbeing. Members of the workforce can find it stressful to be the subject of a public complaint or an internal misconduct allegation. It is the same for witnesses. As part of our pre-inspection file review, we scrutinised 26 cases of internal misconduct across Norfolk Constabulary and Suffolk Constabulary to see whether witnesses and those subject to the allegations had received a satisfactory service, from the initial allegation through to the final assessment. We found that a satisfactory service had been provided in 25 of the 26 cases. The force recognises that 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 affect their wellbeing. In response it has introduced a new voluntary role among officers and staff to provide additional support to those who may be involved in such investigations.

The force focuses on using evidence of what works, so that its activities achieve the best results. This approach is also being adopted to support staff and officers across the organisation. In 2015, the force made 400 wellbeing appointments for staff through an external organisation that provided advice on practical health and

wellbeing to those who sought it. As part of its approach to evidence-based decision-making, the force plans to offer this service again in 2017, so that the force fully appreciates its benefits.

The force's revised approach to health and wellbeing focuses strongly on mental health and emotional wellbeing. Early in 2017, the force signed up to the MIND Blue Light pledge, which runs an independent helpline for members of the workforce seeking help and support.<sup>49</sup> The force recognises the importance of people receiving support quickly when problems arise and offers a range of services through its 'Forcefit' programme. This covers all aspects of wellbeing, including physical and mental health and wellbeing. During the period for which HMICFRS was supplied with data, the force was able to offer its staff an appointment with occupational health within five days of referral, for both physical and mental health matters. This was lower than the average for those forces that could provide similar data, which was 15.1 days.<sup>50</sup>

The force recognises the need to support supervisors to enable them to identify the early warning signs of health and wellbeing problems with their staff, and how to address them. Training around these matters forms part of the force's joint occupational health, safety and wellbeing strategy with Suffolk Constabulary.

## **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.<sup>51</sup> 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.<sup>52</sup> Also, we looked at how fairly forces identify and select

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<sup>49</sup> See MIND Blue Light Programme: <https://mind.org.uk/news-campaigns/campaigns/bluelight/blue-light-time-to-change-pledge/>

<sup>50</sup> Force supplied data for the 10 months from 1 April 2016 to 31 January 2017

<sup>51</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at: [http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%202\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf).

<sup>52</sup> 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](http://www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx)

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**

Norfolk Constabulary still needs to do more to assess the performance of its workforce through a paper-based performance and development review (PDR). Inconsistent use of the paper-based PDR process means the force cannot demonstrate that it uses the process fairly and consistently to manage and develop individual performance. HMICFRS identified this failing both in the 2015 and 2016 inspections. In response, the force revised its approach in April 2016, aiming to introduce a more consistent, fairer process. The force has monitored compliance with this new approach and found inconsistencies in terms of the completion of the appraisals and their quality. The force has further reminded its leaders of the importance of completing accurate staff assessments and was providing support to its workforce to complete them during April to June 2017. However, many of the officers and staff we spoke to questioned the value of the process in terms of promotion and development. Our inspection found that inconsistencies had continued in the use of the process.

### **Identifying potential senior leaders**

Norfolk Constabulary does not have a specific talent management programme to identify and develop its future leaders. The force believes the onus is on the individual to notify the organisation of his or her desire to become a future leader and it relies on line managers to identify potential talent through regular staff appraisals. As we found that the PDR process was used inconsistently across the organisation, HMICFRS questions the fairness and effectiveness of this approach. The force does not subscribe to the national direct entry scheme for identifying potential superintendents from non-police professions. It has recruited one external candidate via the national fast track promotion scheme from constable to inspector. Two applicants for direct entry to inspector succeeded at the national assessment stage.<sup>53</sup> In May 2016, in collaboration with Suffolk Constabulary, the force revised its leadership programme, known as 'The Best I Can Be'. At the time of our inspection, 270 staff had attended workshops that explained what support is available to assist their development.

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See also the College of Policing's competency and values framework. Available from: [www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx](http://www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx)

<sup>53</sup> More information on the national direct entry for Superintendents and Inspectors can be found at: [www.leadbeyond.police.uk/](http://www.leadbeyond.police.uk/)

## Selecting leaders

We found a perception among part of the workforce that the selection and promotion processes could be fairer and more open. While candidates who were unsuccessful in the recent process of selecting constables to sergeants received feedback, not all the staff we spoke with had taken up the opportunity to receive such feedback. The force has responded to these concerns and has reviewed its selection of officers for promotion. It has adopted the national police promotion framework (NPPF), to ensure that future promotion and selection is free from any real or perceived bias.<sup>54</sup>

## Summary of findings



**Good**

Norfolk Constabulary is good at treating its workforce with fairness and respect. The force encourages the workforce to provide feedback and challenge, for example through local forums and seminars, online and by speaking with their line manager. The workforce are able to provide feedback in person or anonymously. The force also has an effective grievance procedure for those that feel they have been treated unfairly. The force reacts positively to feedback and takes action in response to concerns raised.

The force is addressing disproportionality in its workforce to ensure it better reflects the communities it serves. It has not set recruitment targets for those from under-represented groups but is trying to make its recruitment processes as open and fair as possible and is using social media to provide information and encourage people to join the force.

Norfolk Constabulary is good at understanding and promoting the wellbeing of its workforce. The force is continuing to improve the range of wellbeing services it provides. Officers and staff are aware of the services available and how to access them. Supervisors receive training and support to manage their wellbeing responsibilities. A new joint occupational health, safety and wellbeing strategy working group aims to identify and address any matters affecting the physical and mental wellbeing of the workforce.

The force needs to ensure that the value of performance and development reviews is recognised across the workforce and the performance assessment framework is used consistently. It could also do more to improve how it identifies potential senior

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<sup>54</sup> The national police promotion framework (NPPF) is a four-step promotion process for police officers seeking promotion to the rank of sergeant or inspector. For more information see:

[www.college.police.uk/What-we-do/Development/professional-development-programme/National-police-promotion-framework/Pages/National-police-promotion-framework.aspx](http://www.college.police.uk/What-we-do/Development/professional-development-programme/National-police-promotion-framework/Pages/National-police-promotion-framework.aspx)

leaders. Some of the workforce feel that selection and promotion processes could be more fair and open. The force needs to continue to work on ensuring that the actual and perceived fairness of selection and promotion processes is addressed.

### **Areas for improvement**

- The force needs to ensure that selection and promotion processes are open and fair, and are perceived to be so by the workforce.
- The force needs to ensure that the staff performance assessment framework is applied consistently and fairly across the entire organisation and that staff consider it valuable in supporting their development.

## 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](http://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](http://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 staff<sup>55</sup>. 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).

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<sup>55</sup> See sections 38 and 39 of the Police Reform Act 2002. Available at: [www.legislation.gov.uk/ukpga/2002/30/section/38](http://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](http://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 Norfolk Constabulary in the 12 months to 31 March 2016**

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 (available at [www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016](http://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 Norfolk Constabulary as at 31 January 2017**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Data used in the above data were obtained from Home Office annual data returns 501 and 552. (available from [www.gov.uk/government/statistics/police-workforce-open-data-tables](http://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.<sup>56</sup> 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

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<sup>56</sup> 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 practice<sup>57</sup> 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?

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<sup>57</sup> 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.