

PEEL: Police legitimacy (including leadership) 2017

An inspection of North Wales Police



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Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Force in numbers



Workforce

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

2,518

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

officers

1,441

staff (including section 38)

853

PCSOs

224



Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

1.0%

officers

1.0%

staff

0.8%

PCSOs

1.4%

Percentage of BAME in local population, 2011 Census

2.5%



Gender diversity

Percentage of females in overall workforce 31 March 2017

44%

England and Wales population, 2015 estimate

51%

Percentage of females by role 31 March 2017

33%

North Wales Police

62%

PCSOs

51%



Grievances

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

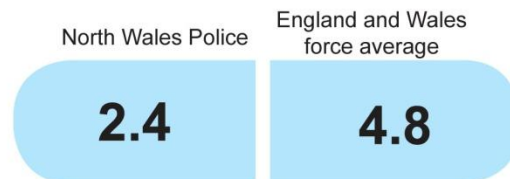


Stop and search

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

1,661

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



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

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

Overall judgment⁴



North Wales Police is judged to be good at how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we looked at this year our overall judgment is more positive than last year, when we judged the force to be requiring improvement. The force is judged to be good at how well it ensures its workforce behaves ethically and lawfully and at treating its workforce with fairness and respect. It is judged to be requiring improvement in some aspects of the way in which it treats all of the people it serves with fairness and respect.

Overall summary

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



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



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



North Wales Police is judged to be good overall in respect of how legitimate the force is at keeping people safe and reducing crime. Previously, the force has acted when notified of areas for improvement, and its leaders have demonstrated a real commitment to ensuring the workforce understands the importance of treating the people it serves with fairness and respect. This includes how well it communicates with people and how fairly it uses coercive powers. However, the force requires improvement in some aspects of the way that it understands the extent to which its workforce treats members of the public with fairness and respect. It needs to do more to ensure its external scrutiny is effective in bringing about changes wanted by the communities it serves, including the way that it monitors and scrutinises the use of stop and search powers, to ensure these are used fairly.

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

North Wales Police has a good ethical culture. This is demonstrated by senior leaders, and officers and staff throughout the organisation, who take an ethical approach to decision making. Members of the public are able to complain easily when they feel that they have not received the service they expect from officers and staff in North Wales Police. Furthermore, the force is good at providing its workforce with the skills needed to identify, respond to and investigate discrimination. Leaders are fully committed to promoting the wellbeing of the workforce; a healthy lifestyle is encouraged and support is provided to those who need it. There are structures in place which allow the workforce to contribute new ideas, challenge leaders and receive feedback. However, the force needs to do more to encourage black, Asian and minority ethnic (BAME) representation within its workforce. It also needs to ensure the new appraisal process is understood by everyone, with a greater emphasis on individual development and organisational learning, and that it is valued and trusted by the workforce.

Areas for improvement

- The force should ensure that all officers and staff have a good understanding of how to recognise and overcome unconscious bias.
- The force should improve its process for regularly and frequently scrutinising a broad range of stop and search data and information, to gain a better understanding of the relationship between age, gender and ethnicity and the number of stop and search encounters resulting in outcomes that were linked to the original reason for the search.
- The force should ensure that all external scrutiny groups have diverse membership representative of its local communities, including young people.
- The force should ensure that, in all cases, it is recording the action taken to update both complainants and those who are the subjects of complaints, in line with IPCC statutory guidance.
- The force should ensure that it has effective processes in place to identify and understand the causes of potential disproportionality in the recruitment and progression of officers and staff from BAME backgrounds, and should take action to address these causes effectively.
- The force should ensure that its selection processes are open and accessible throughout all stages of the application and are clearly understood by all members of the workforce.

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

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

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

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

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

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

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

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

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

Understanding the importance of treating people with fairness and respect

Leaders within North Wales Police understand the importance of treating people with fairness and respect. The force has adopted the College of Policing's values of integrity, impartiality, public service and transparency, which align with the Code of Ethics⁹. Leaders have embedded these values within the continuous professional development (CPD) appraisal process for officers and staff so that the extent of this understanding across the workforce can be regularly tested and improved. The need to treat people with fairness and respect is reinforced through the force's well-established 'It Matters' campaign, which focuses on the importance of what officers and staff say and do when interacting with the public. There is a strong emphasis on the need to improve victim satisfaction. Our findings are consistent with last year's legitimacy inspection.

Understanding of unconscious bias

The force needs to do more to ensure all officers and staff understand unconscious bias. Not all police staff receive specific training on unconscious bias and how this might influence the way they interact with the public, or how the public perceive they have been treated. For example, some police staff working on the front counters do not know the term unconscious bias. However, most members of the workforce receive some form of training or guidance in understanding prejudice and discrimination. As of 1 April 2017, all officers are required to complete a mandatory stop and search training programme. This contains extensive reference to unconscious bias, including stereotyping. At the time of the inspection (May 2017), approximately three percent of all eligible officers had undertaken the training. It is expected that all eligible officers will have received this training by the end of March 2018. Those members of the workforce spoken to by HMICFRS could articulate the need to avoid personal prejudice and discriminatory behaviour. The force should now review its training policy, to ensure that all members of the workforce receive training or guidance in unconscious bias, regardless of the area they work in. Until

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

⁹ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx

this happens, and the learning is reinforced, the force cannot be absolutely certain that all members of the workforce understand unconscious bias and the effect this may have on the service they provide and the way the public perceive they are treated.

Communication skills

North Wales Police is taking positive action to ensure its workforce understands the importance of effective communication skills. For example, effective communication is explored and discussed in the training for officers (and staff who come into contact with the public) which focuses on persons suffering with mental ill-health. This training discusses verbal and non-verbal communication. Officers spoken to by HMICFRS were able to describe situations in which they had demonstrated good communication skills during interactions with the public, such as compassion and empathy. Guidance is provided for all members of the workforce through the 'It Matters' campaign, specifically the section which refers to 'it matters what we say'. The recently-introduced stop and search training programme for officers contains extensive reference to the need for effective communication. Class discussion and scenario testing in this package focuses on good communication skills and how to deal with dissatisfaction. At present there are no plans to provide this more comprehensive training to all members of the workforce, but all officers and staff would benefit from receiving it. The force's emphasis on the need to communicate well means that members of the public coming into contact with the police are more likely to be spoken to in a way that is perceived as fair and respectful.

Use of coercive powers

North Wales Police has a good understanding of how to use coercive powers fairly and respectfully. All officers receive mandatory training in the use of coercive powers. This is provided as part of probationer and annual personal safety training, which includes reference to the National Decision Model, the use of force and officer response options, including de-escalation techniques. Officers receive training on how to use force fairly and only to the extent that it is necessary, proportionate and reasonable in all circumstances, in line with the Code of Ethics. Factors such as age, ethnicity and vulnerabilities – for example intoxication – are to be taken into account. Lessons learned from scrutiny of the use of force are published through North Wales Police's communications to improve officers' understanding in the use of coercive powers.

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

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

Scrutiny of use of force to improve treatment

North Wales Police is using scrutiny to improve its treatment of members of the public that involves the use of force. It complies with the national use of force recording standards, although technical difficulties with its IT systems mean that data must be entered manually. The force hoped to have resolved this problem by October 2017. Officers we spoke to are aware of the need to complete a 'use of force' form after each incident involving the use of force. At a local level, these forms are subject to immediate supervisory oversight. At a strategic level, the use of force is scrutinised by the conflict management board on a quarterly basis. North Wales Police is using this scrutiny to understand trends in the use of force, and individual and organisational learning. Lessons learnt are published by the professional standards department; this learning has been used by North Wales Police to identify good and bad practice during training sessions covering the use of force.

Independent scrutiny of the use of force is provided by the conflict management board, which further reports to the strategic executive board. This is made up of members of the public, including members of the independent advisory group (IAG), the office of the police and crime commissioner (OPCC) and force representatives.

¹⁰ In 2015 HMICFRS found a generally positive picture of force oversight arrangements for use of Taser. However, in 2016, we found that many forces did not have similar levels of oversight for other types of use of force. As a result of a review undertaken by the National Police Chiefs' Council, all forces have been required to collect a minimum data set in respect of use of force since April 2017. The review is available at:

www.npcc.police.uk/documents/uniformed/2016/Use%20of%20Force%20Data%20Report%20to%20Home%20Sec.pdf. Also see *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/

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

In addition, the IAG scrutinises the use of body-worn video cameras in cases involving all forms of the use of force. The OPCC also carries out a review every two months of complaints involving allegations of inappropriate use of force. Data relating to the use of force are discussed every quarter at the deputy chief constable's meeting with the deputy police and crime commissioner. In 2015, HMICFRS found that Tasers were being used fairly and appropriately, but that some officers were not completing the Taser 'use of force' form correctly. HMICFRS found that supervisors are now thoroughly reviewing all cases in which force has been used, including Tasers. Mistakes found in the 'use of force' forms are quickly identified and corrected. This is encouraging progress since 2015.

External scrutiny to improve treatment

The force needs to improve its use of external scrutiny to improve treatment. North Wales Police's force-level IAG is independently chaired and made up of members who have some knowledge of North Wales groups and communities. Membership and representation is considered annually. The application process is clear and accessible. However, HMICFRS found that members of the IAG do not represent their communities; rather they act as an independent voice. This means that while IAG members have some knowledge of what matters most to local people, they may not be best placed to represent those communities, or be seen to be acting in their best interests. It may also make the prospect of joining the IAG less attractive if prospective applicants feel that they must act independently of the communities from which they come.

North Wales Police does not have local-level IAGs. Instead, engagement with communities is undertaken at events organised by the force's diversity unit. Information is then passed back to the force's scrutiny panels and IAG. However, this engagement is not independent of the force, and does not permit independent external scrutiny and challenge at a local level to the same extent that a local independent advisory group would. This is likely to be limiting the extent to which the force has a good understanding of the concerns of local communities, particularly with relation to their perceptions of police treatment. Furthermore, young people are not extensively represented on the IAG; only one member of the group is below the age of 25. On a more positive note, senior officers regularly engage with the IAG and its members receive some training in force policies, the Code of Ethics and legislation. HMICFRS also saw evidence that the IAG was challenging North Wales Police across a broad range of topics, with regular updates provided to members, and was using body-worn video evidence and other data sources to review the use of force. However, the police force is failing to make maximum use of the opportunities arising from external scrutiny to improve the way that it treats people fairly and with respect.

The force encourages external challenge through a number of other methods. For example, members of the public are invited to comment upon how well they feel they have been treated. In the last public survey carried out by the force, between December 2016 and February 2017, 92 percent of respondents felt the police in North Wales would treat them with respect (force figures). At a neighbourhood level, the force invites challenge from members of the community during engagement meetings for local residents. These events are designed by the force to encourage those with less trust and confidence in the police to make their views known. For example, members of the transgender and disabled communities raised concerns about the need for police officers to act with sensitivity. The matter was taken to the public encounters board, which prompted a change of force policy to reflect the communities' concerns.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive available to the police. Their disproportionate use in respect of black, Asian and minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.¹²

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

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

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

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

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

Understanding of national guidance

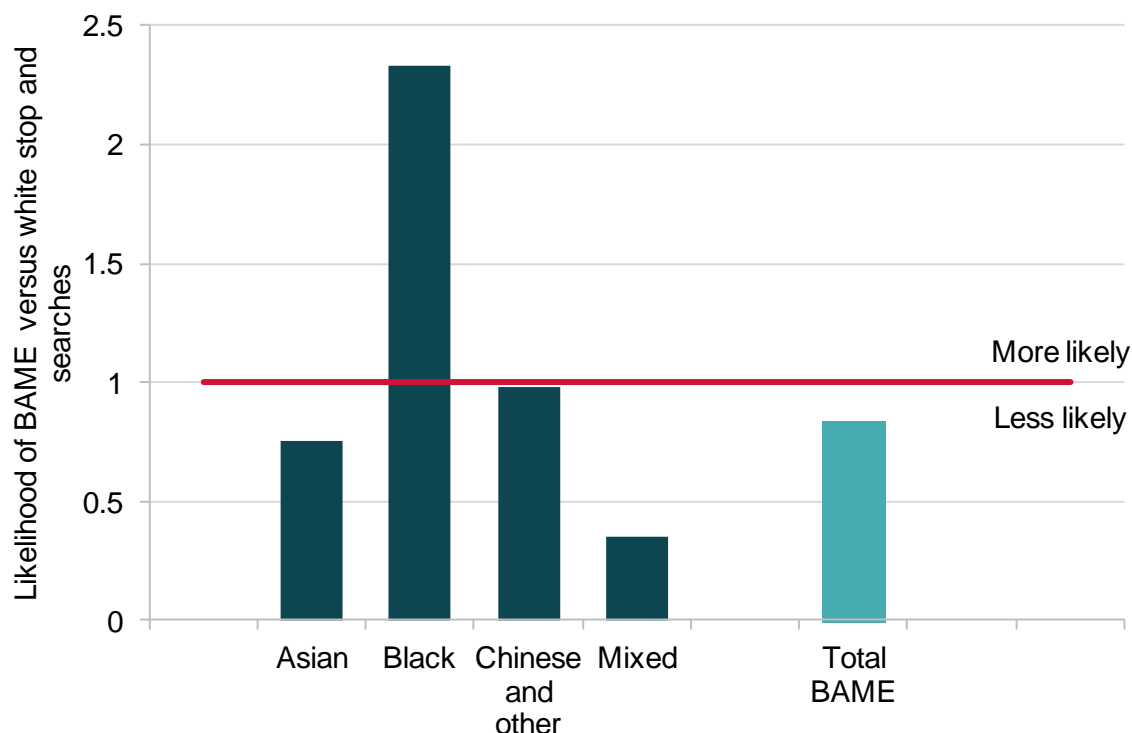
Officers who are likely to use stop and search powers have received training and guidance on how to use the powers fairly and respectfully. This training is provided during probationer and annual personal safety training, and includes reference to the National Decision Model. All police officers have completed this training. The newly-introduced College of Policing stop and search training package contains extensive references to authorised professional practice, abuse of powers and reasonable grounds. The force is in the process of providing this training to all frontline officers. Officers are required to understand when reasonable grounds exist for a stop and search, and when they do not. Despite this investment in training, we still found that, in some cases, officers had not recorded reasonable grounds for their use of stop and search powers.¹⁶ This may indicate that not all officers and supervisors have a good understanding of what constitutes reasonable grounds.

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In the 12 months to 31 March 2016 in the local population of North Wales Police, black, Asian and minority ethnic (BAME) people were as likely to be stopped and searched as white people. However, black people were 2.3 times more likely than white people to be stopped and searched.

¹⁶ See below at Reasonable grounds for use of stop and search.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)¹⁷ compared with white people, in the local population of North Wales Police in the 12 months to 31 March 2016



Source: Home Office 2016

Although the force has a number of boards and groups which regularly scrutinise and monitor stop and search data, including body-worn video camera footage, it has insufficient information to be able to identify all trends and outcomes. For example, it does not understand the relationship between age, gender and ethnicity and the number of stop and search encounters in which the outcomes were linked to the original reason for the search, i.e. finding the item searched for. Similarly, the force does not monitor its use of the powers to ensure it focuses on priority crimes. Furthermore, the force does not have a good understanding of why nearly three-quarters of all stop and search encounters result in no further action, which is a similar rate to last year (year-to-date February 2017). The force is aware that black people are more than twice as likely to be stopped and searched than white people. However, HMICFRS did not find evidence that the force had sought to understand why this was the case. This lack of understanding suggests that potential learning may be limited.

Supervisors regularly review stop and search records to ensure that the grounds recorded are reasonable. Despite this, HMICFRS found that in some cases the grounds recorded were not reasonable (see the 'Reasonable grounds for use of stop and search' paragraph for more detail). Body-worn video camera footage is used by

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

the force to scrutinise the use of stop and search powers, through regular dip sampling, and by the IAG at quarterly meetings. However, as this technology is new to the force, the learning benefits are still being evaluated.

External scrutiny of stop and search powers to improve treatment

North Wales Police is using external scrutiny to improve how it treats people who are stopped and searched, but there are areas where this scrutiny could be improved. Senior police officers, young local college students and IAG members attend the public encounters board (PEB), which scrutinises use of stop and search. In addition, quarterly, the IAG independently reviews body-worn video footage of use of stop and search powers, and feeds back to the PEB. Training is limited to areas involving data protection. We consider that training IAG members in the use of stop and search powers would enable them to challenge police officers with greater understanding of the legislation, processes and rights of members of the public. However, the use of stop and search is discussed during local community group meetings that members of the force's diversity unit and senior police officers attend; force policy was changed following disabled and transgender groups voicing their needs for officers to be more aware of individual sensitivities when exercising stop and search powers.

In 2015, HMICFRS found that North Wales Police was not fully compliant with the Best Use of Stop and Search (BUSS) scheme.¹⁸ The force had a 'ride along' scheme, but this had been restricted to members of its IAG and some local councillors. We are pleased that it is now possible for anyone to accompany officers on patrol to observe the use of stop and search powers. Twice a year the head of the force's diversity unit and IAG review a sample of 20 stop and search records. The results of this dip sample and the thoughts of the IAG are referred back to the PEB in order to improve performance in this area. We noted that at the meeting held in March 2017, IAG members had commented that the grounds recorded for the use of stop and search were of a better standard than previously seen.

¹⁸ Best Use of Stop and Search scheme, Home Office, 2014. Available from: www.gov.uk/government/publications/best-use-of-stop-and-search-scheme

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 must be recorded in the stop and search record.¹⁹

In our 2013 inspection into the police use of stop and search powers,²⁰ 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 sufficiently reasonable grounds to justify the lawful use of the power. For North Wales Police, the 2013 inspection showed that 21 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection²¹ of North Wales Police, we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review of 100 records found that 18 did not have reasonable grounds recorded.

During our 2017 inspection of North Wales Police, we reviewed 199 stop and search records; 15 records did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records completed by the force, our findings indicate that some officers and supervisors either still do not understand fully what constitutes reasonable grounds, or do not know how to record them properly.

It is important to note that a failure to record reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist in reality at the time of the stop and search.

In 54 of the 199 records we reviewed, the item searched for was recorded as having been found. This is an important measure – confirming or allaying an officer's suspicions is the primary purpose of the powers. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

¹⁹ Police and Criminal Evidence Act 1984 Available from: www.legislation.gov.uk/ukpga/1984/60/contents

²⁰ *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/

²¹ *PEEL: Police legitimacy 2015* HMIC 2016 Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

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

	2013	2015	2017
Records not containing reasonable grounds	21 of 200	18 of 100	15 of 199
Item searched for found	-	-	54 of 199

Summary of findings



Requires improvement

Although the force is good at understanding the importance of treating all the people it serves with fairness and respect, it nevertheless requires improvement in the way that it does this. Leaders have demonstrated a commitment to ensure officers and staff understand the need to work with impartiality, integrity and transparency in the best interests of the public. This message is embedded in the force's values, through campaigns and training, and in the annual appraisal process, so that the extent of this understanding can be regularly tested and improved upon. Officers and staff understand the importance of good communication skills and how to use coercive powers fairly and respectfully.

However, HMICFRS found that some members of the workforce did not understand unconscious bias, although the need to avoid prejudicial and discriminatory practice was well understood. We also found the force's IAG is not sufficiently representative of the communities it serves, which limits the effectiveness of its scrutiny. The force has a good understanding of the extent to which it is using coercive powers fairly and respectfully. However, the grounds for the use of stop and search powers are not well understood by all officers who apply them.

Areas for improvement

- The force should ensure that all officers and staff have a good understanding of how to recognise and overcome unconscious bias.
- The force should improve its process for regularly and frequently scrutinising a broad range of stop and search data and information, to gain a better understanding of the relationship between age, gender and ethnicity and the number of stop and search encounters resulting in outcomes that were linked to the original reason for the search.
- The force should ensure that all external scrutiny groups have diverse membership representative of its local communities, including young people.

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,²² as opposed to last year's focus on how well forces are guarding against corruption.²³

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.²⁴ Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.²⁵ 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 2018.²⁶

²² *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

²³ 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/

²⁴ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
The role of leadership in promoting ethical police behaviour, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf

²⁵ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

²⁶ 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

North Wales Police encourages leaders to be good ethical role models who act in accordance with the force's values of impartiality, integrity, public service and transparency, and the behaviours and standards expected of them as set out in the 'It Matters' campaign. The force has a confidence and ethical standards committee (CaESC), which was established in May 2015. This is chaired by the chief constable. The committee is made up of senior police officers, independent advisers and representatives from the OPCC. Referrals can be made direct to the CaESC from any member of the workforce. To encourage further debate regarding good ethical behaviour, the force has recently introduced an ethics forum. Officers and staff can refer ethical dilemmas to the forum, anonymously if they wish, in order to challenge senior leaders. Referrals to date include challenges to the force's policy on tattoos, and free use of public transport while off duty.

These non-punitive referral processes are intended to improve the ethical decision making of the force's leaders, including better accountability and transparency. The force publishes details of chief officer gifts and hospitality, business interests and pay and rewards on the PCC website, which has a link from the force's main website. By way of setting a good example, the chief constable, deputy chief constable and assistant chief constable all drive personal vehicles from a lower category than they are entitled to claim for.

Ethical decision making

The force has effective processes in place to improve ethical decision making at both individual and organisational levels. Force policy is written so that it complies with the College of Policing's Code of Ethics. Equality impact assessments are completed to ensure that all legal requirements are considered throughout the drafting process. Policy writers consult with specialised departments, such as the diversity unit, to ensure compliance with equality legislation. Consultation with external advisers and groups also takes place: for example, the force's stop and search policy was reviewed by community groups and the IAG. The review highlighted a number of potential risks, such as the disproportionate effects on children and young people when they are subjected to stop and search. To mitigate that risk, the force has rewritten the policy to raise awareness of the problem. It has also consulted with young people to identify their concerns; diversity officers attend schools to explain the processes involved in stop and search, and how to complain if they feel they have been treated unfairly.

Ethical training, workshops and leadership seminars focus on the need to act with fairness and respect, and regularly include reference to scenarios when ethical dilemmas are discussed. This work underpins the Code of Ethics and the 'It Matters'

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/

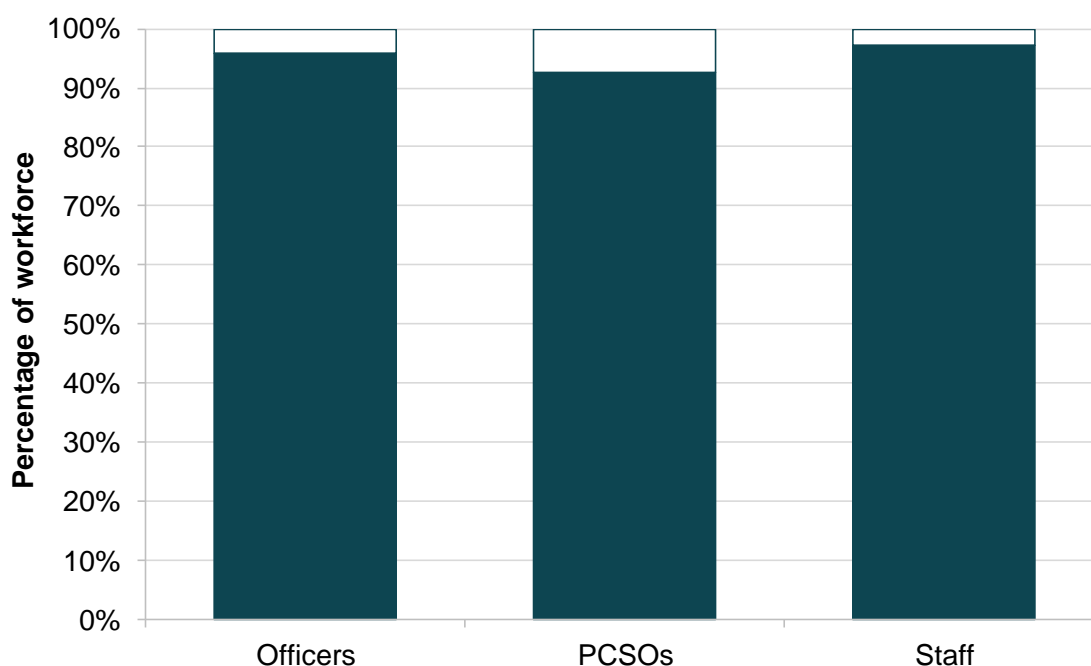
campaign, and is provided to all members of the workforce. Probationer training includes a one-hour examination which considers elements of ethical behaviour as set out in the National Decision Model. The initial seven-day personal safety training package also covers ethical decision making, and all officers attend an annual two-day refresher course where learning is tested and reinforced. The new College of Policing stop and search package, introduced on 1 April 2017, will further enhance this understanding. The force encourages individual and organisational learning – as opposed to apportioning blame – through channels such as its ‘Top Tip Tuesday’ digest and quarterly publications (‘Lessons Learned’). To ensure this learning is understood by all members of the workforce, the new annual appraisal process considers performance related to ethical decision making.

Vetting

During our 2016 legitimacy inspection we considered the extent to which the force was ensuring it was developing and maintaining an ethical culture through effective vetting. We found that North Wales Police was not complying with all aspects of the national vetting standards, specifically that it had a vetting backlog of 180 cases. This was undermining the effectiveness of the screening process and placed vetting staff under additional pressure. To address this situation, the force advised HMICFRS that it had made improvements in the way that it managed the vetting process to reduce the outstanding backlog: the force had increased the number of staff working in the vetting unit by one and introduced an online automated system which prompts staff to complete vetting renewal forms in advance of the expiry of vetting. The force expects the backlog of vetting cases to be reduced to single figures by the end of 2017. HMICFRS considers that these plans are credible and achievable based on the evidence we saw during the inspection.

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 North Wales Police to provide us with data on the percentage of its workforce who had up-to-date security clearance. The data we received showed that on 31 January 2017, 96 percent of officers, 93 percent of PCSOs, and 97 percent of staff had up-to-date security clearance, as illustrated in figure 2.

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



Source: HMICFRS Legitimacy data collection

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

An accessible complaints system is crucial to building public confidence in the police and to a force's ability to improve the extent to which its workforce acts ethically and lawfully. As such, we assessed how easy it is for the public to make a complaint – including how well forces support those people that may require additional help to gain access to the complaints process.²⁷ 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

Members of the public can complain by attending a police station, or by contacting the professional standards department (PSD) directly. The force also offers advice regarding making complaints via the OPCC or by contacting the IPCC. It also provides information about how to use a solicitor or MP to make a complaint on

²⁷ These could include people with learning difficulties, mental health issues, young people or people whose first language is not English. *IPCC Statutory Guidance to the police service on the handling of complaints*, IPCC, May 2015. Available at:

www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/2015_statutory_guidance_english.pdf and *Access to the police complaints system*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf

behalf of a member of the public. This information is easy to find on the force's website. It is also possible to make a complaint electronically via the website. However, the website does not make it clear how to go about obtaining additional support, for example where there may be difficulties in understanding English. A list of interpreter services is not provided. However, the force website is offered in both English and Welsh.

The PSD has produced posters and leaflets explaining the complaints process. HMICFRS found that these are prominently displayed within custody areas and front office counters. The force is mindful that some communities have less trust in the police, and has targeted these groups to ensure they are able to complain. For example, it designed an easy-to-read 'Stop and Search Know Your Rights' leaflet (also accessible from the website), in response to concerns raised by young people in a survey carried out by the force. HMICFRS undertook a review of the force website and found that, in the main, it was up-to-date and could be understood easily.

Keeping complainants updated

As part of the inspection, HMICFRS carried out a file review which examined 25 public complaints. We identified that in nine cases, complainants required additional support to help them explain their allegation or to understand the complaints process. We were pleased to see that in all nine cases the force had provided that additional support.

When forces record public complaints, the Police Reform Act 2002 and Police (Complaints and Misconduct) Regulations 2012 require them to provide the complainant with a copy of the complaint record. The IPCC statutory guidance extends this by stating that complainants should receive an explanation of the possible ways the complaint may be dealt with, and that they should be advised of who will be dealing with their complaint (including contact details). We found that all 25 complaint files contained evidence that these legal requirements had been complied with. Once a public complaint investigation has started, forces have a legal duty to keep complainants informed of their progress; updates should be provided every 28 days and contain enough information to make them meaningful. Our case file review showed that 6 of the 8 cases we reviewed that were dealt with by PSD investigators contained a record to show that the complainant had been updated, but that only 9 of the 17 cases dealt with by divisional staff did. In the absence of accurate records, the force cannot be certain that it is complying with the requirement to provide complainants, and those who are subjects of investigation, with periodic updates, which may have implications for confidence in the complaints process. This is disappointing since HMICFRS raised a similar concern in 2015. We were told that the PSD has now reviewed the procedures for ensuring timely and informative updates and we are of the view that this was an administrative oversight

which has now been addressed. Nevertheless, the force should take steps to assure itself that all complainants, and officers and staff who are subjects of investigation, are provided with regular updates.

When public complaints are finalised, the force is required to provide the complainant with the findings of the report, its own determinations and the complainant's right of appeal. We found that of the 25 complaint files examined, 24 contained evidence that all of these legal requirements had been complied with. Letters written by the force to complainants were seen to be well set out, detailed and courteous in tone and content. This demonstrates that complainants have been taken seriously, and complaints resolved with due regard for appropriate and fair outcomes.

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.²⁸

Identifying and responding to potential discrimination

North Wales Police has taken steps to ensure that it is able to identify and respond to potential discrimination effectively. All officers and staff receive guidance at leadership seminars and chief officer roadshows on the importance of recognising discrimination. This guidance is underpinned by the 'It Matters' campaign (specifically 'it matters what we say' and 'it matters what we do') and, for those coming into contact with the public, courses provided during probationer and annual personal safety training. These courses contain explicit reference to the requirement not to discriminate unlawfully or unfairly. The new mandatory College of Policing stop and search package, currently being introduced by the force, will reinforce this understanding further on an annual basis. Officers and staff spoken to by HMICFRS could demonstrate that they recognise and understand the negative effect of discriminating against members of the public and colleagues.

²⁸ 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

During our case file review, we looked at 10 complaints and four internal misconduct cases that the force had identified as containing an allegation of discrimination. We also looked at an additional 15 complaints and 10 misconduct cases which we considered might contain unidentified allegations of discrimination; we found one complaint and one misconduct case containing allegations of discrimination that the force had failed to identify.

Police (Complaints and Misconduct) Regulations 2012 require forces to refer more serious matters to the IPCC if they are aggravated because it is alleged that discrimination was a reason for the behaviour. We examined the cases the force had recorded as alleging discrimination to determine whether the force had complied with this requirement. We found that three discrimination complaints met the IPCC referral criteria, and that all three had been referred to the IPCC. We found that two discrimination misconduct cases met the IPCC referral criteria, but that only one of these cases had been referred to the IPCC. This omission was brought to the attention of the force and the case was referred to the IPCC. The deputy chief constable dip-samples files on a regular basis to ensure that high standards of decision making are maintained and are compliant with IPCC guidance.

Investigating allegations of discrimination

HMICFRS found that the force is good at investigating allegations of discrimination.

All officers within the PSD, and local investigation staff, receive specialist training in applying the IPCC guidelines for handling allegations of discrimination, drawing on relevant force policies on hate crimes where appropriate. We reviewed 10 complaints alleging discrimination and found them to have been investigated satisfactorily; and that complainants were provided with the required information at the conclusion of the investigation in a format that was clear and easily understandable. Those complainants who required additional support were also correctly identified and offered any necessary assistance. Overall, we consider the force is providing a satisfactory service to discrimination complainants, throughout the complaints process.

Summary of findings



Good

North Wales Police is good at ensuring that its workforce behaves ethically and lawfully. The force has strong leadership in relation to ethical decision making and sends clear messages to the workforce to ensure its members understand what is expected of them. The officers and staff we spoke to were positive about the ethical role-modelling by leaders within the force. Members of the workforce are able to raise ethical problems through an established referral system, and leaders are able to demonstrate that staff feel comfortable in using the system. Chief officers publish information relating to their own gifts and hospitality, business interests, pay and rewards. The force has made it easy for members of the public to complain by providing a range of options by which to do so, including via the internet. North Wales Police is good at providing complainants with the information they need to understand how their complaint is being progressed, and provides a satisfactory service throughout the complaints process. However, it needs to ensure that it maintains accurate records of communication with both the complainants and those who are subjects of complaints. HMICFRS found that officers and staff who investigate allegations of discrimination have the knowledge, skill and experience to apply the IPCC guidelines. The force has a good understanding of discrimination, and identifies, responds to and investigates allegations of discrimination well.

Area for improvement

- The force should ensure that, in all cases, it is recording the action taken to update both complainants and those who are the subjects of complaints, in line with IPCC statutory guidance.

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.²⁹ 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.³⁰ HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances³¹ – to identify, understand, prioritise and resolve their workforces’

²⁹ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

³⁰ *Ibid.*

³¹ 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.³²

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.³³ 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.³⁴

Leaders seeking feedback and challenge from the workforce

North Wales Police is good at seeking feedback and challenge from its workforce. Leaders learn from annual staff welfare and cultural surveys, including analysis of the views of 300 workforce volunteers who act as the ‘pulse’ of the force. These surveys give the workforce the opportunity to provide challenge and feedback on morale and wellbeing. Leaders encourage officers and staff through the ‘Bend the Boss’s Ear’ initiative: senior officers regularly attend local briefings and events to promote discussion with the workforce about what is and is not working. Encouragingly, no specific agenda is set, to ensure staff and officers are able to raise any matters they want to discuss. At a local level, leaders seek feedback and challenge via daily management meetings or briefings which are then brought to the attention of senior leaders.

Since January 2017 the force has made available ‘Fy Llais/My Voice’: an employee online forum which provides members of the workforce with the opportunity to express their opinions, share views, put forward new ideas and generally have their voices heard. To make this process even more inclusive, the force has set up a network of My Voice ambassadors across all force departments to allow challenge to be made anonymously. My Voice is easily accessed via the force intranet. HMICFRS

³² *Code of Practice on Disciplinary and Grievance Procedures*. Acas 2015. Available from www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf. Also *Discipline and grievances at work: The Acas guide*, Acas, August 2017. Available from: www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf

³³ 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

³⁴ 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/

found that all of these processes are well-liked and well-used by the workforce. The force can demonstrate that views and opinions are used to determine force policy. For example the process for promotion to sergeant and inspector was widely criticised as being 'not fit for purpose'; acting on that feedback, and working with the Police Federation and other staff groups, the process was changed. Adopting this approach demonstrates that leaders take seriously their commitment to listen and to act on feedback and challenge from the workforce.

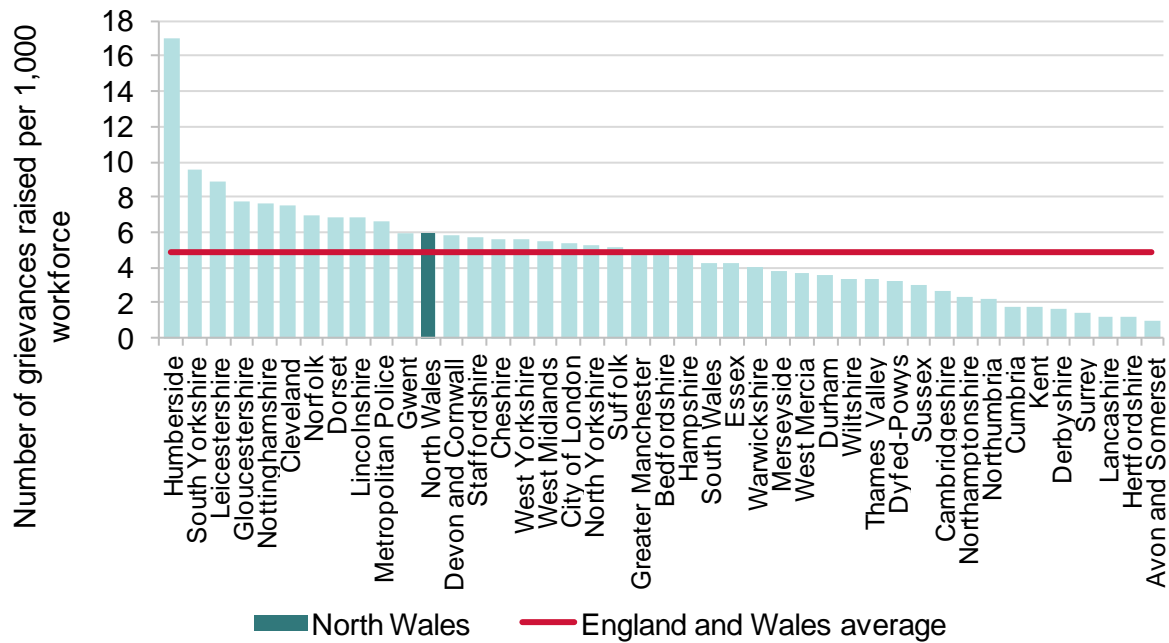
Identifying and resolving workforce concerns

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

All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 3 below shows that North Wales Police had 5.9 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

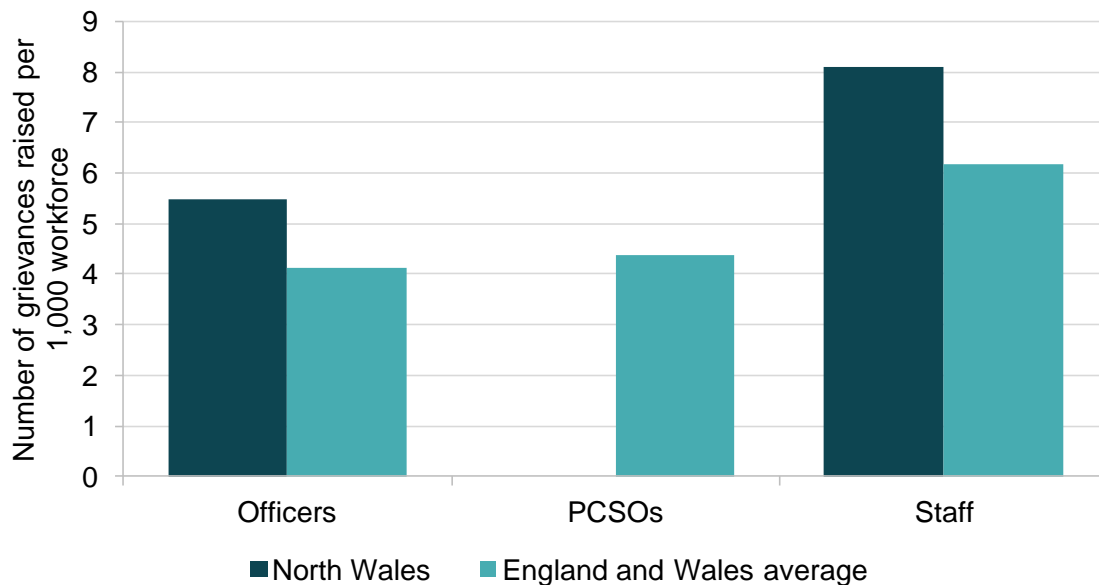
Figure 4 below shows that the number of grievances raised by officers in North Wales Police was 5.5 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period, PCSOs raised no grievances, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 8.1 grievances per 1,000 staff in the same period; and the England and Wales average was 6.2 grievances per 1,000 staff.

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



Source: HMICFRS Legitimacy data collection

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



Source: HMICFRS Legitimacy data collection

The force is good at identifying and resolving workforce concerns and frequently monitors a range of information and data – including feedback from the workforce – to establish the factors that influence workforce perceptions of fair decision making and respectful treatment. Leaders use feedback to identify and act upon workforce concerns, and they encourage individuals or groups to get involved with making

improvements in response. For example, staff challenged the job requirements for police staff investigator vacancies, which were considered to be too heavily weighted in favour of former officers who might wish to apply for the posts. Working with staff and Unison, these job requirements were quickly re-written to appeal to a wider section of candidates.

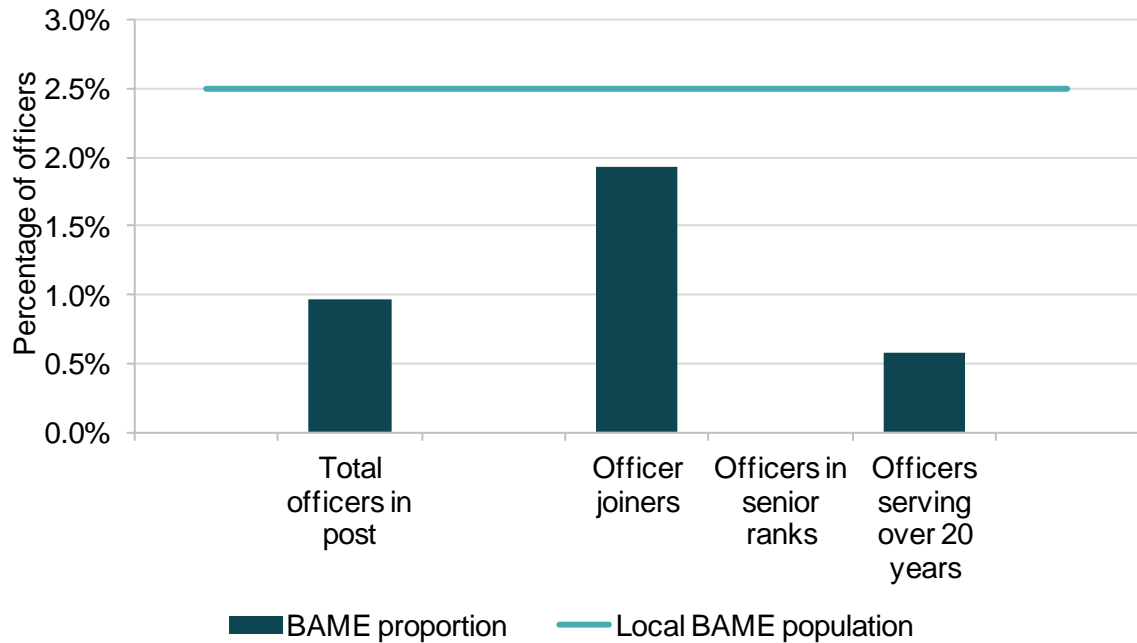
Staff representatives spoken to by HMICFRS referred to the grievance and challenge processes used by the force positively. Officers affirmed this belief; they felt that they would be listened to by senior managers. For example, force policy was changed as a result of a grievance raised by an officer who had been treated unfairly due to a disability. A review of grievance files found that such cases are managed proactively by the human resources unit, in line with the force's grievance procedure. Overall, HMICFRS found the management of grievances is conducted in a professional manner, with matters raised equitably, fairly and courteously. The approach adopted is one of conciliation and collective problem-solving, rather than of apportioning blame. A benefit of this approach is that grievances are invariably resolved at the first stage (the exploration and resolution of a grievance). Officers and staff we spoke to told us they had confidence in the grievance process, and in leaders' commitment to resolving grievances and other workforce concerns.

Creating a more representative workforce

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

In the geographical areas served by North Wales Police, the 2011 census indicates that BAME people made up 2.5 percent of the local population. In the 12 months to 31 March 2017, in North Wales Police 1.0 percent of officers were from a BAME background (see figure 5 below). In relation to officers, 1.9 percent of those joining the force, none of those in senior ranks and 0.6 percent of those who had served over 20 years were from a BAME background.

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 North Wales Police in 2016/17, compared with the percentage of BAME people in the local population



Source: Home Office Annual Data Requirement

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

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

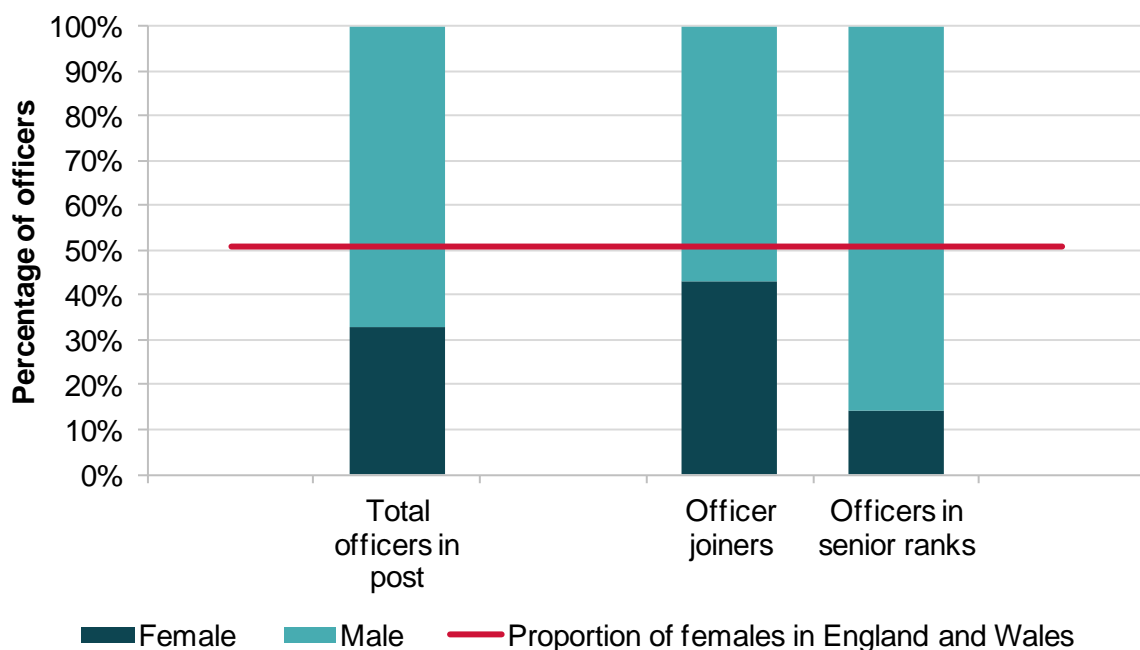


Source: Home Office Annual Data Requirement

In the 12 months to 31 March 2017 in North Wales Police no BAME officers left the force (see figure 6), compared with 65 white officers per 1,000 white officers. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

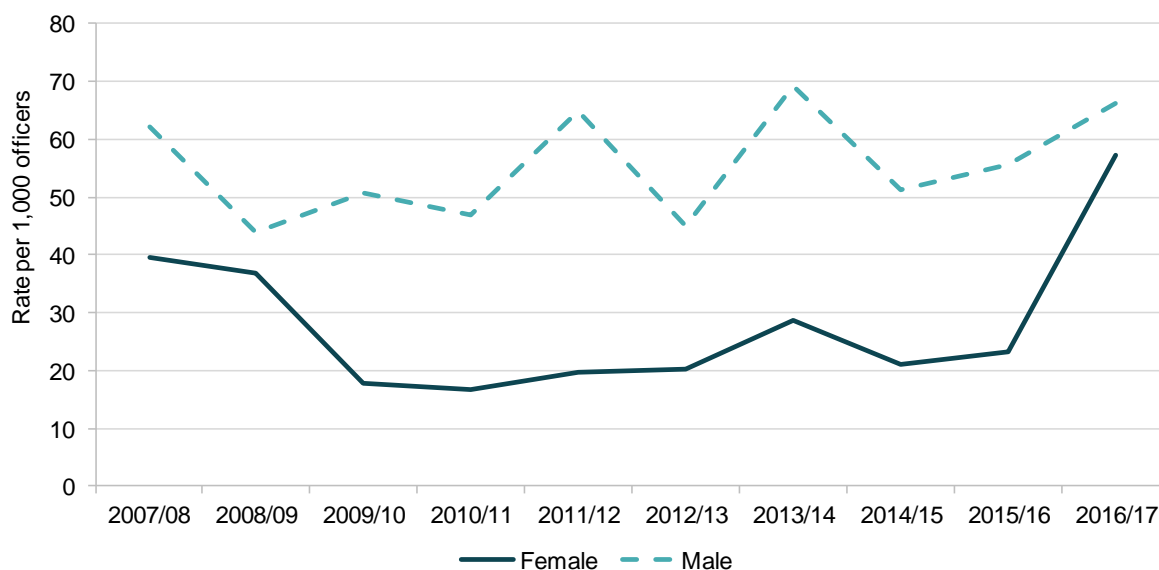
The proportion of female officers is lower than the proportion of females in the general population (51 percent) at 33 percent. In the 12 months to 31 March 2017 in North Wales Police, 43 percent of those joining the force and 14 percent of those in senior ranks were female (see figure 7).

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



Source: Home Office Annual Data Requirement

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



Source: Home Office Annual Data Requirement

In the 12 months to 31 March 2017 in North Wales Police, 57 female officers per 1,000 female officers left the force, compared with 66 male officers per 1,000 male officers. The force has more work to do to address disproportionality in the recruitment and promotion of BAME officers and staff. BAME citizens are under-represented within the workforce as a whole and, noticeably, within senior ranks.

The force is aware of its BAME disproportionality, but efforts to address this situation, for example by advertising vacancies more widely in communities of higher BAME representation, has not significantly increased the number of BAME officers and staff employed by North Wales Police. It is currently revising its positive action strategy in line with guidance issued by the National Police Chiefs' Council (NPCC) to making a 'visible difference' in the number of officers and staff recruited from BAME communities.

HMICFRS is disappointed to learn that force plans to recruit 144 officers during 2017/18 do not directly seek to address BAME under-representation to the same extent that it is using innovative ideas to attract more Welsh-speaking officers. Opportunities for the force to demonstrate its commitment to diversity and inclusion will be presented in forthcoming recruitment campaigns. The position in 2017 is little changed from 2015, when HMICFRS found that there was significant under-representation of BAME people in North Wales Police's overall police workforce, as well as separately for officers and staff. Unless the force adopts a more innovative approach to its recruitment, retention and promotion policy, it is unlikely that this situation will improve. On a more positive note, complaint or misconduct matters which involves people with protected characteristics or from BAME background are scrutinised by PSD and the advice of the Diversity Unit and/or IAG is sought. HMICFRS found some good evidence within a recent case in

which this had been undertaken, where the investigation strategy included a consideration by the IAG and welfare officers. This informed learning and development throughout the wider organisation.

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.³⁵ HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

North Wales Police is taking positive action to understand and promote wellbeing within the force. Welfare is seen by leaders as a priority for the force. They have a well-established wellbeing board, which is responsible for agreeing the 'lifestyle matters' annual action plan. This plan is aligned to local and national health and wellbeing priorities. The new chair of the wellbeing board was seen by members of the workforce with whom we spoke as having brought vigour to wellbeing, and that they regarded this positively. Leaders are aware of their obligations to provide a duty of care to employees under the Equality Act. For example they are committed to making North Wales Police 'dementia-friendly'. A number of trained 'dementia friends' are already in place across the force area, with plans to develop this initiative further. Benefits include development of officers and staff to increase their knowledge and understanding, and recognition and support for officers and staff who are carers for people living with dementia. The force includes wellbeing in role responsibilities for supervisors within its continuous professional development framework, to ensure that wellbeing remains a priority. Concerns raised by HMICFRS in 2016 regarding the lack of a counselling service to support the workforce have now been addressed; this service is now being used by officers and staff.

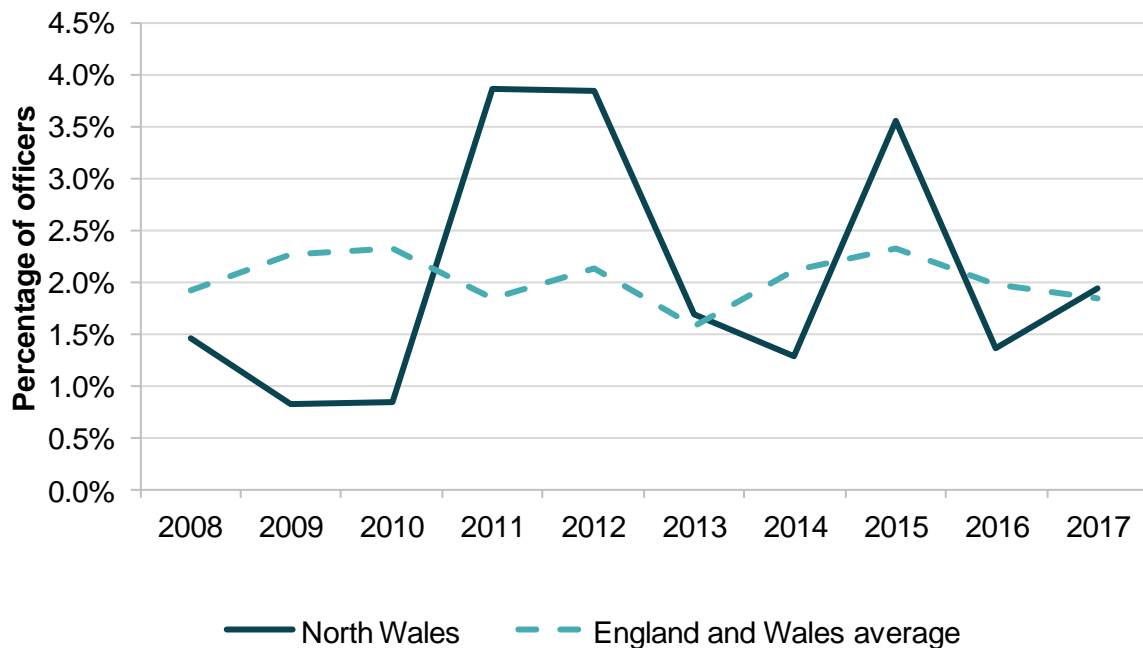
³⁵ *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: <https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/> Also see <https://fitforwork.org/employer/benefits-of-a-healthy-workforce/>

Identifying and understanding workforce wellbeing needs

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

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short/medium-term sickness absence. On 31 March 2017 in North Wales Police, 1.9 percent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 percent. The latest year for which data is available was 2017, which saw an increase of 0.6 percentage points from the previous year, which is in line with changes in the last ten year period (see figure 9).

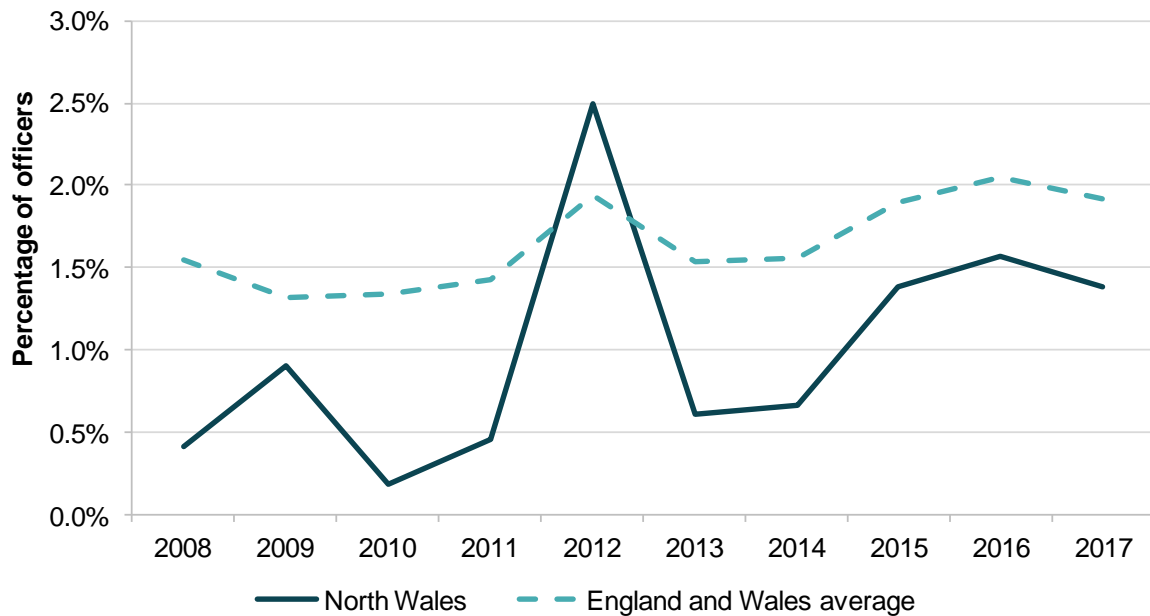
Figure 9: Percentage of officers on short or medium-term sick leave, in North Wales Police compared with the England and Wales average, on the 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in North Wales Police on long-term sick leave was 1.4 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 0.2 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 North Wales Police compared to the England and Wales average, as at 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

North Wales Police takes positive action to identify and understand the wellbeing needs of its workforce, using a variety of ways to identify and understand matters of wellbeing. For example, it reviews regularly feedback from annual wellbeing surveys and the 300 volunteers who make up the ‘pulse’ of the force. Evidence from the most recent pulse survey included the extent to which respondents were satisfied with the amount of support offered in respect of mental health, and the extent to which respondents felt able to talk about matters of wellbeing with their line manager. The well-established wellbeing board, chaired at chief superintendent level, is responsible for agreeing the ‘lifestyle matters’ annual action plan and ensuring it remains aligned to local and national health and wellbeing priorities. The wellbeing board meets each month. On an individual basis, the new CPD process supports the identification and discussion of welfare problems, which supervisors are required to act upon.

Supervisors spoken to by HMICFRS are aware of their responsibilities in promoting the welfare of their officers and staff, and regularly attempt to identify matters of concern during monthly and quarterly reviews. The force has acted positively in order to address individual problems relating to wellbeing. Return-to-work interviews following periods of absence are undertaken by supervisors. Both long and short-term sick absenteeism in the force is below the England and Wales average, indicating that the force is managing the wellbeing of its workforce well. This improvement has been brought about following two thematic reviews of sickness in the last two years. Managers were asked to look at innovative ways of getting people back into work. There are live data on sickness, and other absences, that managers

can access easily in order to identify and act on trends. This approach means the force is extremely well-informed and aware of the needs and wellbeing of its employees.

Taking preventative and early action to improve workforce wellbeing

North Wales Police is taking preventative and early action to improve workforce wellbeing. For example, in response to workforce concerns about back problems, the force has established a musculoskeletal support working group. The group seeks to promote better awareness of musculoskeletal conditions; posters advocating correct posture when working were found by HMICFRS to be widely distributed. The force also has an alcohol and substance misuse support policy. This directs officers and staff to appropriate support services. The force's occupational health service also provides preventative advice on health and work which is supported by the counselling service. However, as mentioned earlier in this report, the PSD should consider revising its procedures for ensuring timely and informative updates are provided to members of the workforce. During the file review undertaken by HMICFRS, we found that records (which should have demonstrated that updates were being provided) were not being maintained. Files reviewed by HMICFRS did not always demonstrate a commitment to regular communication with officers and staff who were subjects of investigation.

Supervisors are provided with training, guidance and support that allows them to recognise the early signs of ill-health. Human resources and training support officers are critical points of contact when managers need expert advice and support, and provide advice on how to refer cases to counsellors. The force has taken notice of workforce concerns about the lack of mental health awareness, and introduced a 'healthy mind' page on the human resources intranet site which includes a guide for managers. Supervisors are now able to refer to mental health peer volunteers who have experience or good understanding of mental health. The force has also published details of its three-step mental health referral process on the intranet and in its 'Communicate' magazine; it is introducing a 'Mind Blue Light' programme to train all supervisors in identifying the signs of poor mental health. This is encouraging progress, since in 2016 HMICFRS found that supervisors did not always feel sufficiently well-equipped to recognise ill-health, particularly in relation to mental health. Taking preventative and early action in this way means that the workforce is more likely to be healthy, happy and more productive.

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.³⁶ In addition, effective performance management and development mitigate risks to the force and ensure continuous improvement. HMICFRS assessed how fairly and effectively forces manage the performance of individual officers and staff, including the value that forces place on continuing professional development (CPD), in line with guidance from the College of Policing.³⁷ Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

Managing and developing individual performance

Since last year's inspection, North Wales Police has improved the way it manages and develops individual performance, but it still has further to go to ensure an effective and fair system for all. Since April 2017, all officers and staff are now subject to a CPD framework based upon the College of Policing core values framework (CVF). The CPD framework measures performance against the force's values of impartiality, integrity, public service and transparency. It aims to ensure that mandatory quarterly performance reviews and annual assessments are undertaken in a structured manner to ensure fairness and consistency. The process includes 360-degree feedback, a talent management grid, skills questionnaire and personal development section. However, at the time of the inspection not all officers and staff had undergone this new process, and some aspects of the CPD framework were still in development, such as those linked to personal development opportunities. In addition, those responsible for developing the CPD had yet to agree a process by which the new performance process can be monitored and evaluated. Consequently the force does not yet have effective arrangements in place to assess and develop the individual performance of officers and staff.

³⁶ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

³⁷ College of Policing guidance on the police performance development review (PDR) process is available from www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

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

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

Most members of the workforce spoken to by HMICFRS were aware of the new CPD process and welcomed its introduction. The majority of officers and staff have received at least one quarterly review using the new CPD process, or had been spoken to by their supervisor in the last six months. Some had received one annual appraisal using the CPD. Supervisors were generally aware of the introduction of the CPD, but some felt they had not had enough training in how to use the new framework. In 2016, HMICFRS said the force should improve how it manages individual performance of officers and staff. It is therefore encouraging to see that North Wales Police has introduced a new process to address this need. However, the force must ensure that it provides satisfactory CPD training to all members of the workforce, and that it has adequate governance and scrutiny arrangements in place to ensure fairness and consistency in the future.

Identifying potential senior leaders

North Wales Police does not have a fully evaluated talent management programme to identify and support potential senior leaders. However, it is envisaged by the force that, as part of the new CPD process and workforce development framework, officers and staff will benefit from developmental opportunities which will identify potential leaders. To support this work the force is in the process of designing and introducing a new way of advertising, requesting and tracking development opportunities for officers and staff. The new CPD has a talent management tool which supervisors use in order to identify and develop future leaders, which is also used in the promotion process. The force is working with a local university to help it map existing leadership activity to identify rising leaders of the future. The force is actively encouraging the workforce to help design these schemes to ensure that the process of identifying potential leaders is seen as valued and fair.

As well as identifying leaders through the CPD and development framework, the force is also seeking to use its new promotion process for sergeants and inspectors to recognise future leaders. The 12-month assessment and temporary promotion process allows a significant period for candidates to be evaluated, with more emphasis on development over time. This development 'pool' then assists with future talent management through coaching and mentoring. These are all promising steps which will help the force adopt practices to identify potential senior leaders in a way that is perceived by the workforce to be fair, open and accessible. With that in mind, the force needs to ensure these selection processes are open to external scrutiny and challenge. It also needs to undertake a full evaluation of the new processes, to take into account feedback and dropout rates, to ensure that it is selecting the right people to be future leaders. As these checks and balances were not in place at the time of the inspection, HMICFRS could not assess how fair the new process is.

Selecting leaders

The force has taken some action to improve the way that it selects leaders, but it needs to ensure that all stages of the selection process are open to independent scrutiny. In response to concerns raised by the workforce, the force has developed a new process for promotion to sergeant and inspector that does not involve a formal interview.

Over a 12-month period, the force assesses candidates' performance in the higher grade. Applicants' senior managers then review applications, with their competency evidenced against each of the positive leadership behaviours. However, prior to formal submission of applications, line managers decide whether they will support them. Some officers felt this 'informal' stage of the application process lacked sufficient independent scrutiny and was too dependent upon the discretion of the line manager. All stages of the formal application process are open to independent scrutiny, with the same people from the Police Federation, HR and leadership development board overseeing each phase. This new process has the full support of the Police Federation and most of the officers we spoke to. Unsuccessful candidates are offered feedback and support, and can appeal any decisions made.

While early feedback from the workforce suggests that the new promotion process is generally seen as a positive development, some members of the workforce were less happy with the way that successful officers are selected for vacancies; some felt that certain roles (for example in CID) were still being filled on the basis of favour rather than suitability for the post. We did not see a clear rationale for how officers are selected for roles, once they have passed the promotion process. The force needs to make this element of the selection process more transparent, so that officers understand the basis on which they have been selected to fill a vacancy. Furthermore, as the promotion process is now a largely competency-based exercise, the force should be mindful of the need to broaden its leadership base. HMICFRS saw no evidence that the promotion process takes into account the need to represent a range of styles, approaches and backgrounds.

Summary of findings



Good

North Wales Police is good in the extent to which it treats its workforce fairly and with respect. The force has made good progress since 2015, by promoting more challenge, and by taking a greater interest in the wellbeing of the workforce. HMICFRS is pleased to see that the force's commitment to existing initiatives like 'Bend the boss's ear' has been maintained, while new initiatives such as 'My Voice' have been introduced. HMICFRS is pleased to see that the external counselling service to support staff, a previous area for improvement, has been re-established. North Wales Police clearly makes resolute and determined efforts to manage grievances effectively, to maintain open communication, and to identify opportunities for early resolution. However, HMICFRS considers that the force should be doing much more to attract, retain and promote BAME people within the organisation. HMICFRS is pleased to see the force has introduced a new annual appraisal process, another previous area for improvement, but leaders need to ensure that supervisors understand the new process. The force also needs to ensure that promotion is seen as fair, open and accessible during all stages of the application process. The selection process for vacant roles also needs to be made clearer.

Areas for improvement

- The force should ensure that it has effective processes in place to identify and understand the causes of potential disproportionality in the recruitment and progression of officers and staff from BAME backgrounds, and should take action to address these causes effectively.
- The force should ensure that its selection processes are open and accessible throughout all stages of the application and are clearly understood by all members of the workforce.

Next steps

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

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

Annex A – About the data

Data used in this report

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

Methodology

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

Comparisons with England and Wales averages

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

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

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

Statistical significance

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

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

Population

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

Note on workforce figures

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

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

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

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

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff³⁸. 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).

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

Stop and search

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

Figures throughout the report

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by working back in time from 7 January 2017 until a total of 200 was reached.³⁹ 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

³⁹ 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 practice⁴⁰ 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?

⁴⁰ 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.